



**Federal Emergency
Management Agency**



**Assistant Secretary of the Army
(Civil Works)**

TO: Federal Interagency Floodplain Management Task Force Member Agencies

SUBJECT: FIFM Task Force Consensus Recommendations and Actions from a Federal Floodplain Management Policy Analysis

The Federal Interagency Floodplain Management (FIFM) Task Force was formed to promote, support, and encourage Federal agencies to formulate and implement programs and policies that: 1) reduce the loss of life and property caused by floods; and 2) protect and restore natural resources and functions of floodplains. It does this primarily through improving coordination, collaboration, and transparency among the federal agencies in floodplain management efforts; conducting studies of floodplain management activities; and improving alignment of federal programs.

The Task Force has already made progress in carrying out this mission. Specifically, it has:

- Convened a listening session with key stakeholders to identify and refine floodplain management issues and priorities.
- Developed guidance for Federal agencies on unwise use of floodplains.
- Conducted research on policies and programs that promote or interfere with good floodplain management practices.
- Made numerous presentations at floodplain and flood risk management events to exchange information relevant to the work of the Task Force.

The Task Force has also provided a forum for enhanced coordination and action on the part of individual member agencies. For example:

- U.S. Army Corps of Engineers (Corps) and Federal Emergency Management Agency (FEMA) have jointly resolved several policy conflicts, including accounting for the National Flood Insurance Program requirements of 44 CFR 65.12 during Corps evaluation of flood risk management projects in the floodplain. Guidance has been distributed to the field offices of both agencies through jointly signed memorandums.
- The Corps has coordinated its Flood Risk Management and Silver Jackets Programs with FEMA's Community Rating System Program to encourage and assist communities in taking responsible steps to better manage their flood risk.
- FEMA and the U.S. Fish and Wildlife Service (FWS) have updated an existing Interagency Agreement to place Coastal Barrier Resources System (CBRS) boundaries on Flood Insurance Rate Maps (FIRMs) and established a new Interagency Agreement to facilitate a digital conversion of the official CBRS maps and make changes that are necessary as a result of erosion and accretion.

At its meeting on July 27, 2012, the FIFM Task Force identified several opportunities and activities to enhance floodplain management efforts at various levels of government and to help agencies become better stewards of public resources. These activities were developed collaboratively by the Working Group of the Task Force, an interagency group with 19 representatives from the following agencies:

- U.S. Army Corps of Engineers
- Federal Emergency Management Agency
- National Oceanic and Atmospheric Administration
- U.S. Environmental Protection Agency
- U.S. Department of Transportation
- Tennessee Valley Authority
- U.S. Department of the Interior
- U.S. Department of Agriculture
- U.S. Department of Defense
- U.S. Department of Housing and Urban Development
- General Services Administration
- White House Council on Environmental Quality (Advisor)

Some of these activities are recommendations to one or more federal agencies. Others describe actions that the Task Force will take and incorporate into its overall work plan to be carried out over the next 3-4 years. Some activities will involve further action by numerous federal agencies, while others are informational in nature. These opportunities and activities are categorized into four areas and are described below.

Compliance

- **Enhance Coastal Barrier Resources Act (CBRA) Compliance.** Federal agencies operating under CBRA (16 U.S.C. 3501 et seq.), are required to comply with its provisions, which are designed to restrict federal expenditures and financial assistance in the development of coastal barriers designated as part of the CBRS. Section 3506(b) of CBRA also requires that each federal agency affected by CBRA report and certify annually to the Department of the Interior (DOI) that the agency is in compliance with the law. Federal agencies have not issued such certifications in recent years. DOI will issue a memorandum to federal agencies to remind them of their obligations under CBRA and request that they provide DOI with an annual letter certifying their compliance with the law, as appropriate. The Task Force recommends that federal agencies respond to DOI's request to help raise awareness about CBRA requirements and ensure that sufficient policies and protocols are in place to prevent the inappropriate provision of federal financial assistance within the CBRS.
- **Assess and Enhance Executive Order (EO) 11988 Compliance.** A recent study conducted by the Task Force indicated that implementation of *Executive Order 11988: Floodplain Management* may not be consistent across the federal government. Effective and consistent implementation of the EO will save lives and property, reduce the economic and environmental impacts of flooding in communities, and reduce costs to taxpayers across the country. Given the impacts of more extreme precipitation events anticipated as a result of climate change, flood losses will likely increase, thus further highlighting the importance of EO 11988. To address this issue, the Task Force will draft a memorandum for CEQ's consideration and issuance, requesting federal agencies that have adopted regulations and implementing guidance to assess their EO compliance and effectiveness of compliance and to take appropriate action where necessary. The Task Force will work with CEQ to assess responses.

Tools/Technology/Data

- **Modernize Coastal Barrier Resource System (CBRS) Maps.** Many of the maps that delineate CBRS boundaries require updates in light of natural changes to the system that occur over time and to be consistent with current technology. Digitizing and modernizing these maps will help all federal agencies responsible for CBRA compliance as well as developers, surveyors, planners, floodplain managers, realtors and other stakeholders who need to know the exact location of the CBRS unit boundaries. Homeowners, in particular, will have a clearer understanding of whether their property is located within the CBRS, so they can more accurately determine whether they are eligible for federal financial assistance, including flood insurance – avoiding the discovery and cancellation of invalid flood insurance policies after claims are made. The Task Force recognizes the value of the modernization efforts already underway and recommends that they be continued and expanded.

- **Enhance Technical Assistance to Communities in Coastal Areas.** Coastal areas are home to over 160 million people, support 66 million jobs and contribute \$8.3 trillion to the U.S. economy. These areas are also prone to a number of natural hazards. As a result, it is critical that we provide coastal communities with the resources they need to make better decisions that reduce flood hazards. The Task Force will be exploring broader use of the Community Rating System as an incentive mechanism for coastal communities to make better floodplain management decisions. In addition, the Task Force plans to assess floodplain management-related technical assistance available to coastal communities and identify gaps that may need to be filled.
- **Enhance Collaboration and Research on Mapping to Support Floodplain Management.** Maps are powerful tools in floodplain management. The Task Force will be working to assess and enhance data collection, distribution, collaboration and research related to mapping to support floodplain management. It will place special emphasis on identifying, quantifying or mapping the natural areas of floodplains and their beneficial uses and values.
- **Improve the Link Between Agencies and Available Floodplain-related Research Capabilities.** There are potential disconnects between agencies responsible for establishing and implementing policies that impact flood risk or floodplains and those agencies involved in scientific research and data collection. The Task Force will evaluate disconnects and establish a more formal mechanism for coordination so the available research becomes more broadly available and research needs are aligned with future research plans.
- **Assess Federal Use of Flood Loss Data and Identify Potential Improvements in Collection, Dissemination and Use.** Federal agencies are often asked to report on flood-related losses. This information is important for understanding the impacts of policies and programs in and around floodplains. Federal agencies collect and use flood loss data differently based on their missions and the needs of their stakeholders. The Task Force will convene key federal agencies to discuss what flood loss data they have, how they calculate flood losses, and how they use these data (e.g., policy questions they try to answer). The Task Force will compile this feedback to create a more comprehensive view of how flood loss data is collected, calculated and used within federal agencies and key, high-level similarities and differences. Based on this feedback, the Task Force will identify approaches for improving the collection, dissemination and/or use of flood loss data to enhance future policy decisions.
- **Study the Benefits of Protecting Natural and Beneficial Functions.** Floodplains provide more value, or services, per acre than any other land type. However, floodplains continue to be degraded by development and other activities that often cause hidden losses, both economic and environmental, for communities and the nation. The Task Force will conduct a review of existing information to assess our current state of knowledge about valuing the natural resources and functions of floodplains. Based on this assessment, the Task Force will identify opportunities to quantify and/or qualitatively describe the benefits that floodplains provide.

Partnerships

- **Improve Silver Jackets Awareness and Participation.** Silver Jackets interagency teams promote valuable collaboration among federal and state agencies with respect to flood risk management. They focus on a common set of priorities and are capable of more easily leveraging resources to solve problems. Involvement by federal agencies other than FEMA and the Corps, however, has been inconsistent. Having stronger support for Silver Jackets teams from all agencies involved in flood risk and floodplain management will provide more resources and opportunities for collaboration to the Silver Jackets teams and promote more innovative and effective approaches to flood risk management. The Task Force will prepare a memorandum to its member agencies and other

interested agencies recommending that they designate a point of contact to coordinate their involvement in the Silver Jackets program.

- **Coordinate Under Presidential Policy Directive 8 (PPD#8) Initiatives.** PPD #8 provides an opportunity to improve floodplain management by providing a partnership venue to ensure assistance is available to integrate mitigation and floodplain management into recovery, mitigation and response policies, plans, programs, and decision making. The FIFM Task Force is developing processes to ensure that it is coordinating closely with the leadership structure of the National Disaster Recovery, Mitigation, and Response Frameworks as developed under PPD #8, specifically as it relates to floodplain management.

Communication

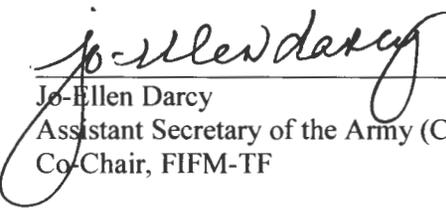
- **Promote the Task Force Role in Resolving Interagency Conflicts.** One reason the Task Force was formed was to identify and address policy or programmatic conflicts among federal agencies that may be resulting in poor floodplain management decisions. The Task Force will more actively promote its role in addressing these issues and opportunities so other members of the floodplain management community are aware of the potential resource the Task Force can offer.

As noted previously, many of the above recommendations will be merged into the Task Force's work plan. Participation by all federal agencies in support of Task Force efforts is encouraged. Please contact any member of the Task Force for further information on the work of the Task Force or its current activities.



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Date: 1/24/13



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