



December 5, 2012

Mr. David L. Miller, Associate Administrator
Federal Insurance and Mitigation Administration
Federal Emergency Management Agency

Ms. Deborah Ingram, Assistant Administrator
Recovery Directorate
Federal Emergency Management Agency

Dear Mr. Miller and Ms. Ingram:

As recovery from Hurricane Sandy begins to get underway in the North East, we would like to take this opportunity to thank you for your efforts to reach out to our organizations and make some recommendations and offer support and assistance from our organizations.

1. Substantial Damage Estimation and Identification of Mitigation Opportunities

As local community officials begin to undertake the task of Substantial Damage Estimation, we would like to suggest that this presents an excellent opportunity to identify mitigation opportunities; including mitigation opportunities for non-substantially damaged buildings and structures. It has been our experience that local officials may be quite overwhelmed at this time, and under pressure to quickly complete the estimates and even perhaps to avoid labeling properties as substantially damaged. There are many communities and companies which have built up significant expertise in this regard and which should be able to offer assistance through the use of a mechanism such as EMAC. We would like to recommend that FEMA return to the previous policy that conducting such reviews is an eligible expense under Public Assistance – we believe such inspections for substantial damage are truly a health and safety issue. To that end we ask that FEMA explicitly state that EMAC expenses for the purposes of bringing in building inspectors and other such officials from previously impacted communities, such as those along the Gulf Coast, be reimbursable through Public Assistance.

Further we believe that an aggressive campaign of counseling and guidance be provided by FEMA through its authority to provide technical assistance under the Stafford Act. Such technical assistance,

similar in concept and scope to assistance provided in past disasters under the Stafford Act, should include public information and counseling designed to persuade communities, and the public entities to build and rebuild in a safer, smarter and sustainable manner thus reducing the toll of future disasters.

2. ABFEs and Freeboard

We would like to applaud your efforts to promote Advisory Base Flood Elevations (ABFEs) post-Sandy and to get them out so quickly – it is our understanding that these will be released throughout December. These will provide communities much needed information for long term recovery and mitigation. We also are promoting the use of freeboard, and add that we believe that the use of Advisory Base Flood Elevations coupled with a minimum of 2-4 feet of freeboard could have a significant impact on the future exposure of the properties currently being rebuilt. As flood insurance is currently rated, 2 feet of freeboard provides a 50% reduction in flood insurance premiums, reducing the long term financial impact on future property owners. We feel that this is a strong economic incentive for the use of freeboard, even in non-substantially damaged structures. Furthermore, especially in the coastlines of the United States, Sea Level Rise will most certainly have an impact on future flood elevations. Higher freeboards not only reap the current benefit of reduced flood insurance premiums, but also provide a buffer when flood maps are revised and flood elevations increase. Of course freeboard also provides an additional factor of safety. We stand ready to assist you in the dissemination of this message.

This economic incentive includes the savings to a homeowner in their flood insurance premium. We are currently working with StormSmart Coasts and the Education in Disasters Network (EDEN) to update materials encouraging the use of freeboard including a clear statement of the financial advantages of freeboard. Some example materials are included as an attachment to this letter.

Example of Savings on NFIP Premiums* with Freeboard

	V Zone ¹		A Zone ²	
	Annual savings	30-year savings	Annual savings	30-year savings
1' freeboard	\$1,360 (25%)	\$40,800	\$502 (41%)	\$15,060
2' freeboard	\$2,730 (50%)	\$81,900	\$678 (55%)	\$20,340
3' freeboard	\$3,415 (62%)	\$102,450	\$743 (60%)	\$22,290

3. National Conversation Through the Use of the National Hazard Mitigation Collaborative Alliance

As two of the tri-chairs of the Collaborative Alliance, we are struck by the tremendous opportunity that has presented by Hurricane Sandy. We are seeing a conversation take place in the media, as well as in communities, regarding safe development, resilience, and hazard mitigation. We propose that this presents a perfect window in which to host a National Conversation on these issues. The impacts of Hurricane Sandy coupled with changing risks from climate change and the changes to the NFIP from

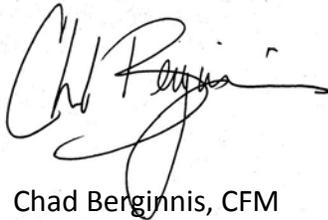
Biggert-Waters, all combine to make this an excellent time for a national dialogue similar to the discussions which took place after the 1993 floods.

Other Efforts

Both NHMA and ASFPM are actively engaged in outreach and training related to the post-Sandy recovery. NHMA is currently partnering with the Center for Clean Air Policy (CCAP) to host a series of webinars titled: "Bridging the Gap between Hazard Mitigation and Climate Adaptation." The first in this series will feature a roundtable discussion to identify overlaps and bridge gaps between the hazard mitigation and climate adaptation communities of practice to foster resilient, equitable, healthy and prosperous communities. Practitioners will discuss commonalities and differences between short- and long-term resilience efforts, and highlight communities that are integrating hazard mitigation and climate adaptation. The floor will then open for a roundtable discussion on next steps. ASFPM is currently in discussions with our Chapters in the affected areas to identify training and outreach opportunities that would be most appropriate and add value to the recovery effort. We hope to be able to provide you details very soon.

Thank you for your consideration of our recommendations. We very much look forward to working with you on these various recommendations. Please feel free to contact either Chad Berginnis, Executive Director for ASFPM at cberginnis@floods.org, Alessandra Jerolleman, Executive Director for NHMA, at nathazma@gmail.com

Sincerely,



Chad Berginnis, CFM
Executive Director
ASFPM



Alessandra Jerolleman, MPA, CFM
Executive Director
NHMA

cc: Matt Campbell, FEMA
Roy Wright, FEMA