TESTIMONY

Addressing the Threat of Worsening Natural Disasters

Before the

Senate Committee on Homeland Security and Governmental Affairs

By

Jerry Hancock, CFM
Executive Director
Michigan Stormwater Floodplain Association

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Introduction

On behalf of the Michigan Stormwater Floodplain Association (MSFA) and the Association of State Floodplain Managers (ASFPM), we appreciate the opportunity to discuss our views and recommendations on addressing the threat of worsening floods during National Preparedness Month. We thank you, Chairman Peters, Ranking Member Portman and Members of the Committee for your interest in this important subject.

The ASFPM and its 38 chapters, including MSFA represent more than 20,000 local and state officials as well as private sector and other professionals engaged in all aspects of floodplain management and flood hazard mitigation, including management of local floodplain ordinances, flood risk mapping, engineering, planning, community development, hydrology, forecasting, emergency response, water resources development and flood insurance. All ASFPM members are concerned with reducing our nation's flood-related losses. For more information on the association, visit www.floods.org.

Floods are the nation's most frequent and costly hazard. The cost to taxpayers continues to increase at an alarming rate. ASFPM estimates average annual flood losses were about $5.6 billion in the 1990s. This increased to an average annual flood loss of $10 billion in the 2000s, and in this past decade came close to doubling again with a conservative estimate of $17 billion per year.

Flooding affects many property owners nationwide. Unfortunately, for those less fortunate who have little financial ability to move out of high-risk areas, many federal policies create a moral hazard as well. Recent studies estimate that as many as 60 million people live in flood hazard areas—whether it be the 1% annual chance (100-year) floodplain or the .2% annual chance (500-year) floodplain. This does not account for the other flood hazard areas such as storm surge zones, tsunami zones, residual risk areas due to potential dam or levee failures or emergency water releases from dams.

The nation faces an increasingly disruptive urban flooding threat. Indeed, flood risk is far more widespread than is perceived, or generally known or recognized. Through flood hazard identification, the flood risk can be better understood, but as a society, we are not doing enough to reduce flood risk until it is often too late and a flood is bearing down on an area. Individual property owners are affected differently from flooding risks and sea level rise depending on the actions that they have or have not taken to reduce that risk.

The ultimate question from a public policy standpoint is how do we get property owners and communities prepared for a future where flood risk is more significant and, in some areas, predictably far worse? What adjustments do we need to make in our approach to flood risk management to increase awareness of hazards and to align our policies and programs to ensure a high degree of resiliency as communities face tough choices about where to grow and where to invest? Experience tells us that at the community scale, flood resilience is a multi-decadal process. The most successful communities in the country, such as Charlotte, North Carolina or Tulsa, Oklahoma have been preparing for and mitigating flood risk for three decades or more, and still much remains to be done.

Preparedness Begins with the Comprehensive Identification of Hazards and Assessment of Risk

You cannot be prepared if you don't know your risk. In addition to being an important part of the National Flood Insurance Program (NFIP), floodplain mapping is the foundation of all flood risk reduction efforts, including design and location of transportation and other infrastructure essential to support businesses and the nation's economy. The flood maps are also used for emergency warning and evacuation, community planning, and

locating critical facilities like hospitals, schools and emergency shelters. Floodplain mapping is cost-effective and delivers at least a 2-to-1 taxpayer benefit, and floodplain maps support communities' resilience actions.

When it comes to identification of flood risk, the NFIP has compiled one of the world's most comprehensive datasets related to flooding. Despite that success, more than half of the United States remains unmapped and much of the nation lacks critical data needed by communities to plan for the future. For most of the NFIP's history, flood mapping was primarily done to support two NFIP functions: flood insurance rating and floodplain management standards. As a result, two pieces of data were typically produced: the 100-year and the 500-year flood zones. However, as the NFIP grew and as flood risk management became more important, the nation's citizens looked to the FEMA flood maps as the primary source of any kind of flood risk information for a given area. In 2012, Congress, for the first time as part of the NFIP reform legislation, authorized a National Flood Mapping Program (NFMP) and at the same time adopted a more expansive view of flood mapping. It required, among other things, several new, mandatory types of flood risks to be depicted on the nation's Flood Insurance Rate Maps (FIRMs), beyond the 100-year and 500-year flood areas, including:

1. All populated areas and areas of possible population growth located within the 100-year and 500-year floodplains;
2. Areas of residual risk, including areas that are protected by levees, dams, and other flood control structures and the level of protection provided by those structures;
3. Areas that could be inundated as a result of the failure of a levee, dam, or other flood control structure;
4. Areas that are protected by non-structural flood mitigation features;
5. Ensuring that current, accurate ground elevation data is used;
6. Inclusion of future conditions risk assessment and modeling that incorporates the best available climate science; and
7. Including any other relevant data from NOAA, USACE, USGS and other agencies on coastal inundation, storm surge, land subsidence, coastal erosion hazards, changing lake levels and other related flood hazards.

Unfortunately, we are not aware of any single flood map in the entire country where all of these data sets exist on either a FIRM panel or in the accompanying data FEMA provides. Therein lies the problem. The NFIP has been mapping floodplains since 1968 and we have had a National Flood Mapping Program, which has been authorized by Congress since 2012, but many key elements have not been implemented. In fairness to FEMA, during the past decade, the agency has made progress on improving the quality of the existing flood maps, in use of high-resolution topography, and in the area of communicating information to communities and the public (either through the mapping process itself or through technologies and tools). Nevertheless, we believe these additional elements Congress required are essential for an effective national flood mapping program.

What is the gap then? ASFPM believes that the gap lies in getting the job of initially mapping the nation done.

Consider:

- Based on the National Hydrography Dataset (NHD) and NOAA shoreline data, there are approximately 3.5 million miles of streams and rivers, and 95,471 miles of coastlines in the nation. Currently, only 1.14

million stream miles and 45,128 shoreline miles have flood maps. By this metric, only about 1/3 of the nation has been mapped.

- More than 3,300, or roughly 15%, of NFIP communities have maps over 15 years old, with many of these over 30 years old and still using old-fashioned paper maps.
- Many of the added mapping requirements from 2012 haven't even been started beyond preliminary studies and research. This includes residual risk mapping around flood control structures and future conditions mapping. A 2016 TMAC report reviewing the National Flood Mapping Program stated: *"To create technically credible flood hazard data, FEMA needs to address residual risk areas in the near term. Residual risk areas associated with levees and dams are of great concern."*
- In 2020, in a House Science Committee hearing examining FEMA's flood mapping program, FEMA recognized these mapping needs and testified that appropriations simply have not been enough to make meaningful progress on the additional mapping responsibilities identified under the National Flood Mapping Program.

This gap in data is contributing significantly to the increasing flood losses in the nation. A 2018 study shows that the total U.S. population exposed to serious flooding is 2.6 - 3.1 times higher than previous estimates, and that nearly 41 million Americans live within the 100-year floodplain (compared to only 13 million when calculated using FEMA flood maps). This translates into 15.4 million housing units. The same study indicates that over 60 million people live in the 500-year floodplain.

In 2020, ASFPM completed the update to its 2013 report *Flood Mapping for the Nation*, which modeled the costs to fully implement the National Flood Mapping Program under the 2012 Biggert-Waters Reform Act and complete the initial flood mapping of the nation. We conclude that it will cost between $3.2 and $11.8 billion to complete the mapping in the nation and then cost between $107 and $480 million to maintain these maps as accurate and up-to-date.

To improve flood mapping in the nation:

- **We recommend the reauthorization, funding, and enhancement of the National Flood Mapping Program (NFMP) as part of NFIP reauthorization.**
- **We support an increased authorization for the National Flood Mapping Program to between $600 million to $1.8 billion annually in order to accelerate the completion of the job of initially mapping the nation in five years and getting to a steady-state maintenance phase.**
- **FEMA must complete the initial flood mapping of the entire nation to get mapping ahead of development and FEMA must prioritize the elimination of the un-modernized paper map inventory in the nation.**
- **We support the one-time flood map funding investment of $3 billion as part of the reconciliation bill as a significant down payment on finishing the initial job of completing flood mapping for the nation.**

In hundreds of communities across the nation, residents have experienced substantial and sometimes alarming increases in both the frequencies and areal extents of high-volume precipitation events. These have often been accompanied by increased flooding and substantially increased flood damages and other costs, including damage to homes, businesses and supporting infrastructure. The stormwater and flood management systems that were built in the past using now-outdated precipitation records are now often overwhelmed and are suffering considerable damage due to increased rainfalls.

Atlas 14 is an essential precipitation frequency tool developed and maintained by NOAA that informs federal agencies, engineers, states, tribes, communities, businesses, and citizens of the frequencies and high-level precipitation volumes that can be expected in given areas and regions, based on historical experience. The Atlas 14 studies, over time, and especially in some regions, have become seriously outdated. Accurately identifying, through regional volumes, the high-level precipitation and the likely frequencies of occurrence are fundamental to providing accurate and reliable flood risk information and flood maps for all U.S. communities. They are also vital for planning and guiding community development and are used in the design of most of the nation's local, state, tribal, and national infrastructure to avoid crippling and costly damages from the adverse impacts of floods, and to save lives.

The National Oceanic and Atmospheric Administration's National Weather Service, Office of Water Prediction has generally undertaken the efforts to develop, maintain, and update Atlas 14. Nevertheless, the development and updating of Atlas 14 volumes has often lagged, sometimes literally for decades, because no dedicated funding has been available for updates, which scientists say should be done at least every five years. Previous hearings before the Senate Commerce, Science and Transportation Committee and the House Committee on Science, Space and Technology have expressed strong concerns that Atlas 14 updates have experienced delays due to funding problems and the failure to incorporate the most recent critical data. In the wake of recent hurricanes and Gulf Coast tropical storms, and culminating especially with Hurricane Harvey in Southeast Texas, the Atlas 14 volume for the Texas region was updated (but not until after Harvey), showing that the design storm 24-hour precipitation event—with a 1% annual return frequency (commonly referred to as the 100-year event), has now grown by more than 30 percent, literally over the past decade. The resulting problem was clearly shown in 2017's Hurricane Harvey, when thousands of homes outside the then-identified 100-year, and even the 500-year floodplain, were flooded because the flood maps were based on the old Atlas 14 projected rainfalls. In addition to the federal taxpayers having to help pay to repair all those flooded homes, Texas Coastal communities, consequently, are revising building codes and basic storm water drainage and flood management systems in recognition of the much higher precipitation levels they are experiencing and now anticipating.

NOAA has indicated that for approximately $3.5 million annually, the nation's regional Atlas 14's could be kept updated, creating a much-needed nationwide uniform atlas, and communities could receive data layers reflecting updated present and future conditions precipitation frequencies, based upon observed and reasonably predicted climate and weather-based trends.

Currently, the updating process is entirely dependent on states and local governments within a region donating the update funds—which often takes years to cajole and accumulate, and often results in years-to-decades of delays in updating these crucial studies. At present, except for Texas, which was completed in 2018, and a minor 2019 New England update, for all other Atlas 14 volumes, far more than five years have elapsed since they were updated, therefore not reflecting more recent precipitation events that have been more intense and frequent in many areas of the country. Notably, for the Ohio River Basin and many surrounding states, it has been nearly two decades since these volumes were updated, and for the Northwest states of WA, OR, MT, ID and WY, it has been nearly 50 years since the region's precipitation frequency atlas was updated. NOAA has also indicated that it would be far more efficient and cost-effective to approach these updates on regional and national scales, rather than state-by-state. Providing updated, authoritative, national precipitation frequency data and analysis has been a long-standing, basic NOAA Weather Service responsibility, upon which many other federal agencies' as well as state, local, tribal, and private sector responsibilities and standards are predicated.

- **We strongly support the inclusion of $492 million in the bipartisan infrastructure bill for coastal and inland flood inundation mapping and forecasting and next generation water modeling activities, including modernized precipitation frequency and probable maximum precipitation studies. Further, we urge Congress to pass the FLOODS and PRECIP Acts to provide ongoing authorization to develop and provide these important flood frequency data.**

Preparedness is Informed through Good Planning and State and Local Priorities

For over 20 years, states and communities have developed and updated hazard mitigation and preparedness plans. The Disaster Mitigation Act of 2000 has challenged states and communities to identify their hazard mitigation and preparedness priorities, as well as to periodically update them. Despite these major risk assessment and planning efforts undertaken by states and communities, we are concerned with what we are seeing as a trend in FEMA programs to be overly prescriptive, increasing focus on FEMA priorities versus state and local priorities. For example, in the State of Michigan's 2019 Hazard Mitigation Plan, a general principle is to implement the flood mitigation actions in the following order of priority:

1. Acquisition and relocation of flood-prone structures.
2. Elevation of flood-prone structures.
3. Stormwater management/improvement projects.
4. Drainage projects (culverts, channels, retention ponds, detention ponds, etc.).
5. Wet and dry flood proofing of structures.
6. Structural measures (floodwalls, dikes, jetties, etc.) priority has been given to the following

Similarly, in Ohio, acquisition of flood prone structures is a top priority.

Our concern is the implementation of the Building Resilient Infrastructure and Communities (BRIC) program. We were disappointed in the program's priorities and the results from program's initial round of funding. Although the Disaster Recovery Reform Act of 2018 reformed the Stafford Act's Pre-Disaster Mitigation Program to increase the emphasis on pre-disaster mitigation, it did not fundamentally change the eligibility of an array of flood mitigation project types, including traditional property-specific mitigation actions which have been shown to be highly effective over the past three decades. Yet, with BRIC, a program was created with significantly different focus and priorities as compared to the legacy PDM program. In fact, less than 10% of the funding in BRIC was available for state and local mitigation priorities (through the set-aside), with a bias towards large scale infrastructure projects and coastal communities. No competitive applications were selected for further review in FEMA Regions 5, 6, 7, or 8 even though over 567 competitive applications from across the nation were received. In terms of flood mitigation and preparedness, it is our belief that much more priority and preference should be given to state and local mitigation and preparedness priorities in FEMA pre-disaster mitigation grant programs.

Preparedness is Enhanced through Data Sharing and Better Informing the Public

In recent years, the record has been mixed when examining the federal government's willingness and capability to share data to help better inform flood risk.

One longstanding issue is slowly being addressed. The 2016 TMAC report National Flood Mapping Program Review, identified a legacy DHS policy through its Security Classification Guide for the Protection of Critical Infrastructure and Key Resources, which listed dam failure inundation maps as "For Official Use Only." However, this policy conflicts with Congress' Biggert-Waters 2012 National Flood Mapping Program requirements that such areas be provided on Flood Insurance Rate Maps and on publicly-available databases such as National Levee Database (NLD) and National Inventory of Dams (NID). As noted in the report, a Virginia law passed in 2008 essentially requires that all inundation mapping developed for state-regulated dams must be made available to communities and the public. In California, a real estate disclosure law in the area that would be inundated by a dam failure, is resulting in publically available dam failure inundation mapping through a web viewer. ASFPM wants to acknowledge and express appreciation for the US Army Corps of Engineers in being the leader in addressing this issue by making flood inundation maps available for its dams in the National Inventory of Dams, which will be available later this fall. This availability, in turn, will enable FEMA to meet the statutory requirements of the National Flood Mapping Program. Other federal agencies, however, have been slower to embrace this change.

- **We recommend that Congress exercise oversight and ensure that any flood risk data, including all dam/levee failure inundation mapping, developed by the federal government and/or associated with any federal program should be made publicly available.**

Critically Needed Flood Claims Data Availability is Severely Hindered

Until about two years ago, floodplain and emergency managers have been able to obtain flood insurance claims data to support effective enforcement of their floodplain management standards and for use in preparedness and mitigation planning. FEMA had a process to provide claims data quickly to state and local officials provided it was being used for legitimate and authorized governmental purposes.

More recently, flood risk data, and in particular flood insurance claims data, has been made nearly impossible to obtain from FEMA as a result of FEMA's evolving compliance with the Federal Privacy Act and evolving DHS legal interpretations of what constitutes Personally Identifiable Information (PII). These data help inform local mitigation plans, can provide heat maps on claims hotspots, are needed to apply for and administer flood mitigation grants, property disclosure, and are useful in communicating flood risk. They are essential for communities when they update local hazard mitigation plans and for participating in the Community Rating System. Our members report even obtaining authorization to obtain these data is difficult with both state and community legal counsel often advising against entering into newly developed agreements with FEMA that have overly-broad indemnification clauses.

The ultimate result of not being able to obtain these data – especially flood insurance claims data – is communities are less resilient to flooding, and are severely hindered in formulating properly-informed, up-to-date flood hazard mitigation plans. We are concerned that as we see a record level of interest and funding for

hazard mitigation programs, communities will be unable to effectively apply for and obtain grants because they cannot obtain claims data that would inform which properties have suffered repetitive flood losses. And while we believe reasonable safeguards must exist to protect sensitive personal information, the current interpretation and approach is not reasonable. We acknowledge FEMA's difficulty in trying to come up with an efficient and reasonable approach in light of evolving interpretations of PII from DHS, but a middle ground to provide this key data must be found.

- **We urge the Committee to exercise oversight on this issue and if necessary, make the necessary legislative adjustments to allow for data that would inform flood risk such as flood insurance claims or substantial damage determinations, be provided, at a minimum, to state and local officials in an timely and efficient manner.**

Greater Flood-Related Real Estate Disclosure Needed

Although millions of homes throughout the U.S. are at risk of flooding, 21 states have no real estate disclosure laws. This makes it difficult for a home buyer to learn of a property's flood history. These states do not require sellers to tell prospective home buyers or renters whether a property has been damaged by a flood and limiting access to such information prevents people from making smart decisions about where to live. Unfortunately, many homeowners learn of their propensity to flood only after suffering through multiple disasters. The other 29 states have varying degrees of disclosure requirements. In 2018, the Natural Resources Defense Council researched this topic extensively and developed an interactive website where each state's flood disclosure law can be reviewed. This hodgepodge of state and local policies hinders buyers from making fully informed decisions.

- **We support a national real estate disclosure requirement for a property's flood history. Such a requirement could be tied to a state's participation in the NFIP.**

Preparedness is Successful When You Have Adequate State, Local, Territorial and Tribal (SLTT) Capacity

The federal taxpayer pays an increasing share of disaster costs because we have not built the state, local, territorial, and tribal capacity to manage these risks. States with more capability end up having lower disaster costs and recover more quickly from natural disasters. There are programs in FEMA and other agencies that help build a state's capacity to provide training and technical assistance to communities.

To enable the NFIP to improve accessibility and to provide better technical assistance to over 22,000 communities in the NFIP, the Community Assistance Program (CAP-SSSE) was developed in the 1980s. This program invests in building capability to do floodplain management at the state level in order to assist the communities in the state with their NFIP participation responsibilities. This approach is necessary because it would be impossible for FEMA either to directly assist that many communities or for the program to provide funding assistance to all communities in the program. It is important to recognize communities must meet the NFIP standards and that they do so within the laws and framework that differs in each state, making it even

more important for states to provide that assistance. For a modest investment of around $10 million annually, CAP-SSSE currently leverages state investments to create and maintain the capability to successfully enable effective floodplain management at the state and local level.

- **We support explicitly authorizing the CAP-SSSE program as part of NFIP reform and increasing the budget to $20 million annually**

Currently, most state hazard mitigation programs are funded through management costs as part of mitigation grants that have been awarded or won. Should a state be fortunate and have years with no disasters or if the state does not get awarded pre-disaster mitigation program projects, it is difficult to maintain capacity to assist communities with applying for and managing mitigation grants. We propose a new approach, modeled after the CAP-SSSE program, which could be directly funded out of the new Building Resilient Infrastructure and Communities (BRIC) program to set aside $10-20 million expressly for building and maintaining state hazard mitigation program capability. The benefits are myriad, including providing better and more robust technical assistance to communities for developing and preparing successful grant applications, assistance in mitigation planning, specifically addressing low-capacity or economically-disadvantaged communities flood-related challenges, and better addressing needs of socially-vulnerable populations. This small but effective investment of BRIC funding will reap huge, long-term benefits.

- **FEMA should immediately develop a new cost-sharing program funded out of BRIC and modeled after CAP-SSSE to develop and maintain state capability to administer FEMA hazard mitigation programs.**

Another effective approach is to provide incentives for those states that adopt stronger building codes and land use standards for development, thereby reducing state costs for disasters. Currently, according to FEMA, two-thirds of communities facing hazard risks have not adopted hazard resistant codes and standards, and, in recent years, 30% of new construction has taken place in communities with either no codes or codes that have not been updated this century. Lack of resources is a primary reason large numbers of communities, particularly rural and smaller communities, fail to update their building codes by adopting more recent editions, fully implement the codes they have or their state has adopted, adopt effective land use standards (such as subdivision regulations with provisions dealing with hazards), or modernize their enforcement efforts. Although some existing FEMA programs fund code-related activities, these programs force communities and state applicants to prioritize among eligible projects. We were extremely disappointed that while FEMA publicly claimed that a priority for the BRIC program was to build state and local capacity, projects to do this were limited to less than 10% of the available BRIC funding as part of the state set-aside. As a consequence, only 0.5% of the FY2020 BRIC funding went to code-related projects.

- **FEMA should end limiting capacity-building projects and hazard mitigation planning projects to only the state set-aside portion of BRIC and allow such projects to be eligible through the competitive portion of funding (which was over 90% of available BRIC funds last year).**

- **We strongly support the $300 million proposed in the reconciliation bill dedicated to the adoption, implementation and enforcement of hazard resistant codes and standards.**

Preparedness is Improved through Research and Technological Innovation

One deficiency ASFPM has noted is that unlike other science and regulatory agencies, FEMA does not have a robust research and development (R&D) capacity. While FEMA does well in certain respects incorporating some of the best available science and technology when applied to the flood mapping program in particular, ASFPM believes that this ability is hampered by not having an internal R&D capacity. This, in turn, leads to not having an intentional R&D agenda. Intentionality is the key.

The Department of Homeland Security Science and Technology Directorate's Flood Apex Program was created in 2016 at the request of the administrator of FEMA to bring together new and emerging technologies designed to increase communities' resilience to flood disasters and to provide flood predictive analytic tools to FEMA, state and local governments, and other stakeholders. Although the program ended in 2020, it had a particular focus on new and emerging technologies, including activities that focus on technology development. For example, one project is focused on using time-series satellite imagery to complement flood risk mapping and visualizations. Another is using high-performing and artificial intelligence to detect physical buildings from satellite images to develop a national inventory of structures in the floodplain. And another was focused on developing low-cost commercial grade flood sensors to improve the nation's flood preparedness and warning capability. In short, Flood Apex had been a productive approach to addressing some of FEMA's R&D needs and could be of significant support to overall community flood preparedness in the future.

- **Congress should ensure that there is a robust and resourced research and development function within either DHS Science and Technology or FEMA to ensure that FEMA's R&D needs are met.**

Technologies to increase resilience against hazards continue to evolve at a rapid pace. In addition to technologies that are incubated through R&D programs like Flood Apex, we have seen tremendous innovation in private industry. For example, today, some of the first flood glazing systems (think glass flood walls/windows). These glass flood systems can make commercial high-rise buildings with a lower level retail areas more resilient and still preserve the function of the building in areas where it might be infeasible to relocate the building. It is important that standards keep up with the rapidly evolving technology. ASFPM is proud to be partnering with FM Approvals and the US Army Corps of Engineers in the National Flood Barrier Testing and Certification Program to allow for the testing and certification of these innovative products to the ANSI 2510 standard and to serve as a one-stop-shop for consumers to find approved products. As standards are evolving along with technology, it is all the more critical that Congress supports any and all efforts to include these updates standards for federally funded projects as well as being adopted by states and communities. Further, we support US Army Corps of Engineers efforts to replace its water testing laboratory in Vicksburg, Mississippi which is presently used for testing associated with meeting the ANSI 2510 standard.

Preparedness and Mitigation Must Be Equitable

More recently, issues of equity and social vulnerability have been recognized as a critical need to be addressed. FEMA's National Advisory Council's (NAC) 2020 report made the focus on equity a centerpiece of the vision of the future of emergency management. It noted that "For disaster preparedness, mitigation, response, and recovery to drastically improve in 2045, emergency management must understand equity and become equitable in every approach and in all outcomes. The exacerbated impacts of disasters on underserved and historically marginalized communities across the United States showcases existing inequity."

ASFPM supports improvements to FEMA hazard mitigation grant programs, like the Flood Mitigation Assistance (FMA) program, to better address equity and social justice. Increasingly, it is recognized that traditional benefit-cost analysis (BCA) that focuses primarily on damages and losses favors high-value homes and communities and does little to recognize issues of social vulnerability. Further, FEMA's longstanding, restrictive interpretation and treatment of Uniform Relocation Act (URA) assistance can result in inequities for those most vulnerable, especially those who ultimately cannot participate in a mitigation project due to the inability to secure comparable safe, sanitary, and affordable housing. We've made recommendations in the past, such as excluding costs of complying with other federal laws like URA and environmental compliance laws from BCA calculations, which would result in mitigation grants being more equitable and help advance environmental justice issues.

- **We support Recommendations 2020-01 and 2020-22 of the NAC report, which recommends the FEMA Administrator create an Equity Standard, and would encourage FEMA to assess the current process of distributing mitigation funds to determine which policies, regulations, and legislation need to be revised so the outcomes are more equitable.**

While some states and communities do have the staff capacity to navigate the increasingly complicated mitigation grant application and administration process, the stated goal number three of FEMA's current strategic plan – reduce the complexity of FEMA – can lead to more equitable and socially just outcomes. Too often, the complexity of the application process itself can discourage communities from competing for hazard mitigation funds.

Another desirable preparedness goal that would lead to an equitable and socially just outcome is to completely close the flood insurance gap. For some, the cost of flood insurance has already become unaffordable. Over the past several years, an idea gaining traction is a program providing means-based premium subsidies to address flood insurance affordability. ASFPM supports this concept as long as it includes two provisions—that the subsidy is shown separate from the premium so that the policyholder better understands the underlying flood risk, and that the subsidy is paid for outside of the NFIP and therefore by taxpayers versus NFIP policyholders, as the benefits accrue to society at large versus other NFIP policyholders. It seems appropriate that such a program would be inclusive of an equity standard that has been proposed by FEMA's National Advisory Council.

- **We strongly support the $1 billion in the reconciliation bill to help low- and moderate-income households buy flood insurance and close the coverage gap that leaves poorer households and communities more vulnerable to flood damage. Further, we support the permanent authorization of such a program as part of NFIP reform.**

In Conclusion

Flood preparedness takes a collective effort from individuals, communities, states, federal government and the private sector. True flood resilience is a sustained effort that can take decades to achieve. Yet everyone has a role. We hope that this testimony has provided you with some ideas to consider in how the federal government can assist the nation in being more resilient to flooding.

For any questions, please contact Jerry Hancock, MSFA Executive Director at JHancock@a2gov.org (734-794-6430 ex. 43709); Chad Berginnis, ASFPM Executive Director at cberginnis@floods.org (608 828-3000); or Merrie Inderfurth, ASFPM Washington Liaison at merrie@floods.org (703 732-6070).