



ASSOCIATION OF STATE FLOODPLAIN MANAGERS, INC.

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February 12, 2008

Mr. David Maurstad
Assistant Administrator, Mitigation Directorate
U.S. Department of Homeland Security/FEMA
500 C Street S.W.
Washington, D.C. 20472

RE: Proposal to Incorporate Freeboard in the International Residential Code

Dear Mr. Maurstad:

The Association of State Floodplain Managers (ASFPM) endorses FEMA's proposal to incorporate one-foot of freeboard into the flood provisions of the International Residential Code (code change proposal RB93-07/08). We believe this is a necessary and positive step to reduce flood losses and improve the safety of homes throughout the nation.

ASFPM has long endorsed adoption of the factor of safety referred to as "freeboard" as one of the most significant and readily achieved ways to reduce future flood damage. We were pleased that hard evidence to support our position is provided in the NFIP Evaluation report, "*An Evaluation of Compliance with the National Flood Insurance Program Part B: Are Minimum Building Requirements Being Met?*" We are encouraged to see how quickly the added cost of higher foundations can be recovered through both reduced damage and lower NFIP insurance premiums.

From the beginning of the National Flood Insurance Program we have known that the national minimum elevation requirement of the Base Flood Elevation unnecessarily exposes new construction to flood damage. In riverine areas, freeboard offers some protection to account for uncertainties in computer models used to develop flow volumes and to predict flood depths. Incomplete or missing data can result in uncertainties in the statistical and computational methods used to predict the magnitude of the 1%-annual-chance flood (100-year flood). The hydraulic models that produce flood depths are approximations of the waterway environment; for example, most models assume channels will remain free of debris blockage (or ice jams), which past experience demonstrates is highly unlikely.

Other uncertainties that freeboard serves to mitigate include anticipated or unanticipated upland development that generates additional runoff, thus increasing flooding, and the likely increases in flood

Dedicated to reducing flood losses in the nation.

Chair

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depths caused by development in floodway fringe areas that, by FEMA's rules, are allowed despite predictions that it will increase flood elevations. Although there are many unknowns that may influence the frequency and severity of long-term coastal and riverine flooding, freeboard is the clearest first step towards providing a small, but cost effective added protection against increased flood damages.

At FEMA's request, we recently updated data in our publication, "Floodplain Management 2003", regarding state-required freeboard. The results show that eighteen states, Puerto Rico, and the District of Columbia, require a freeboard of from 1.0 to 3.0 feet: Arizona, Georgia, Hawaii, Indiana, Iowa, Kansas, Maryland, Maine, Michigan, Minnesota, Montana, North Dakota, Nebraska, New York, Oregon, Pennsylvania, Tennessee, and Wisconsin. These states represent more than 9,150 local jurisdictions that participate in the NFIP. We know that of the 18,632 communities with mapped Special Flood Hazard Areas, more that 60% are required by states to administer freeboard or have elected to adopt freeboard into their flood damage prevention ordinances. These states and local governments have recognized the benefits of improved flood-resistant construction, which your policy rating may reflect.

The Association of State Floodplain Managers (ASFPM) and its 26 State Chapters represent over 11,000 state and local officials and other professionals who are engaged in all aspects of floodplain management and hazard mitigation. This includes floodplain management, mapping, engineering, planning, community development, hydrology, forecasting, emergency response, water resources and insurance. All ASFPM members are concerned with working to reduce our nation's flood-related losses. Our state members head offices that are designated by the Governors to coordinate the National Flood Insurance Program (NFIP) with their communities, and many others are involved in the administration of and participation in FEMA's disaster mitigation programs, as well as state authorized and funded programs that reduce flood losses. For more information on ASFPM, our website is: <http://www.floods.org>.

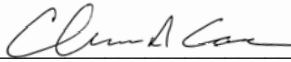
In addition to ASFPM leadership, please note that this letter is also endorsed by many of our State Chapters as per the attached signature sheet. These Chapters are composed of the local floodplain managers who issue development permits for buildings and also deal with the consequences when structures are flooded. They are the front line professionals who educate the public on how to be safe from flood damages.

Sincerely,

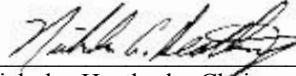
Al Goodman
ASFPM Chair

cc: Edward Laatsch, FEMA Mitigation Directorate

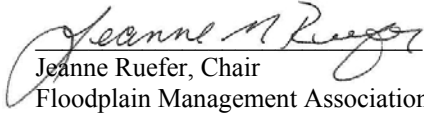
The undersigned endorse ASFPM's support for inclusion of one-foot of freeboard into the International Residential Code.



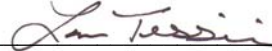
Charlie Cave, Chair
Arizona Floodplain Management Association



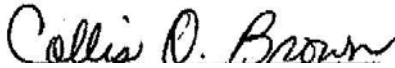
Nicholas Heatherly, Chair
Missouri Floodplain and Stormwater Managers Association



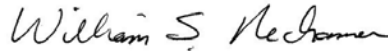
Jeanne Ruefer, Chair
Floodplain Management Association (CA, HI, & NV)



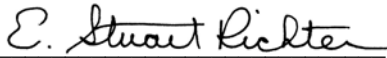
Laura Tessieri, Chair
New Jersey Association for Floodplain Management



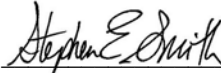
Collis Brown, Chair
Georgia Association of Floodplain Management



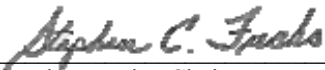
Bill Nechamen, Executive Director
New York State Floodplain and Stormwater Managers Association



E. Stuart Richter, Chair
Illinois Association for Floodplain and Stormwater Management



Stephen Smith, Chair
North Carolina Association of Floodplain Managers



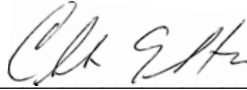
Stephen Fuchs, Chair
Indiana Association for Floodplain and Stormwater Management



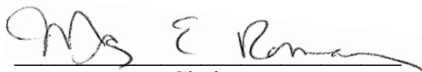
W.B. Smith, Chair
Oklahoma Floodplain Managers Association

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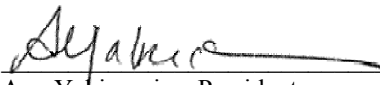
Taylor Duncan, Chair
Kentucky Association of Mitigation Managers



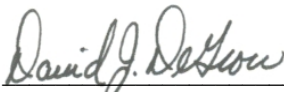
Christopher Stone, Chair
South Carolina Association for Hazard Mitigation



Mary Roman, Chair
Maryland Association of Floodplain and Stormwater Managers



Ann Yakimovicz, President
Texas Floodplain Management Association



David DeGrow, Chair
Michigan Stormwater-Floodplain Association



Shane Parson, President
Virginia Floodplain Management Association

Chapter supports – unable to send signature

Sandra Johnson, President
Association of Floodplain Managers of Mississippi



Thomas Sear, Chair
Wisconsin Association for Floodplain, Stormwater, and Coastal Management