



FEMA

October 5, 2011

Gary Heinrich
Bruce Bender
ASFPM Insurance Committee Co-Chairs
2809 Fish Hatchery Road
Suite 204
Madison, Wisconsin 53713

Regarding: Docket ID FEMA 2010-0017 (SFHDF)

Dear Mr. Heinrich and Mr. Bender,

We have received the comments in response to Docket ID FEMA-2010-0017 submitted by the Association of State Floodplain Managers (ASFPM). Thank you for taking the time to review the form and to offer some substantial and useful comments for us to explore.

If we do plan to make changes, they will be made public and the form will go through a 30-day comment period. At that point, the public will again have a chance to comment on any changes. Thank you for taking the time to review the form.

Sincerely,

A handwritten signature in black ink, appearing to read "Dennis Kuhns".

Dennis Kuhns
Division Director
Risk Insurance Division
Federal Insurance and Mitigation Administration



Association of State Floodplain Managers, Inc.

2809 Fish Hatchery Road, Suite 204 Madison WI 53713

Phone: 608-274-0123 | Fax: 608-274-0696 | Email: asfpm@floods.org | Web: www.floods.org

Executive Director

Larry A. Larson, P.E., CFM

Associate Director

Chad M. Berginnis, CFM

Associate Director-Operations

Ingrid Danler

September 8, 2011

Docket Manager, Office of Chief Counsel
DHS/FEMA
500 C Street, SW., Room 835
Washington, DC 20472-3100

RE: ID FEMA-2010-0017

Dear Docket Manager:

In response to Docket ID FEMA-2010-0017, the Association of State Floodplain Managers (ASFPM) is submitting comments regarding the renewal of the Special Flood Hazard Determination Form that we feel will enhance the quality, utility, and clarity of the information to be collected and the use of the form. These recommendations are therefore a reflection of floodplain managers who work with flood maps, map changes and interact with property owners when there are questions and concerns raised due to potential discrepancies or misinformation.

ASFPM and its 30 Chapters represent over 14,000 state and local officials and other professionals who are engaged in all aspects of floodplain management and hazard mitigation, including management, mapping, engineering, planning, community development, hydrology, forecasting, emergency response, water resources, and insurance for flood risk. All ASFPM members are concerned with working to reduce our Nation's flood-related losses. Many of our state members are designated by their governors to coordinate and implement the National Flood Insurance Program, and many others are involved in the administration and implementation of FEMA's mitigation programs. For more information on the Association, our website is: <http://www.floods.org>.

The following are ASFPM's recommendations to improve and enhance the form:

1. Section I; box 2 (Collateral): This box should require that the lot, block and subdivision in addition to the property address. This is a much more specific identifier than property address which at times is wrong. The tax parcel number should also be included if available. These all aid when doing manual determinations by either a determination company for the lender or by the local community official.

Dedicated to reducing flood risk and losses in the nation.

Chair

Sally McConkey, P.E., CFM
Water Resources Engineer
Illinois State Water Survey
217-333-5482
sally@illinois.edu

Vice Chair

William Nechamen, CFM
State Floodplain Manager
NY State Dept. Env. Conserv.
518-402-8146
wsnecham@gw.dec.state.ny

Secretary

Alan J. Giles, CFM
Information Geologist
Georgia DNR/FP Mgmt.
404-362-2612
alan.giles@dnr.state.ga.us

Treasurer

John V. Crofts, CFM
State Floodplain Manager
Utah Div. Homeland Sec.
801-538-3332
jcrofts@utah.gov

Association of State Floodplain Managers, Inc.

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October 6, 2011

2. Section II; Part B: Add a Box 5 to ask if a Section 1316 Declaration has been issued? Y/N. This would protect the lender's position as NFIP flood insurance is not available.
3. Section II; Part C; Box 2: Restate sentence:

Flood Insurance is not available because:

☐ Community does not participate in the NFIP ☐ Community is on suspension as of ____

4. Section II; Part C; Box 3: It is unclear if it is a CBRA or OPA designation date, so change the 3rd line to read:
☐ CBRA ☐ OPA Designation Date _____
5. Section II; Part D: Too many property owners equate not required with not needed and there is no risk for flooding, when in fact, the latest NFIP data shows 25% of their claims occur in flood zones rated as B, C, or X...all moderate-low risk areas! A stronger statement is needed if the answer is "no". Suggested verbiage:
 - a. "If no, flood insurance is not required by the Flood Disaster Protection Act of 1973; however, the risk of flooding is only reduced, not removed. Property owners should seriously consider flood insurance and may be eligible for the lower-cost Preferred Risk Policy."

ASFPM appreciates the opportunity to provide these suggested changes to this valuable form. Should you have any questions about our recommendations, please call or email us.

Sincerely,

Gary Heinrichs, Co-Chair
ASFPM Insurance Committee

Bruce Bender, Co-Chair
ASFPM Insurance Committee

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