

National Flood Insurance Program Community Rating System Redesign Public Meeting (08/21/24) - Transcript

Document Purpose

This document is a transcript from the August 21, 2024, Federal Emergency Management Agency (FEMA) National Flood Insurance Program (NFIP) Community Rating System (CRS) Redesign public meeting. This public meeting occurred in conjunction with FEMA's [July 11, 2024 Request for Information](#) (RFI) on the CRS Redesign program in the Federal Register.

Transcript

Slide 1 – Title Slide

- **Hunter Gray:** Welcome to the Public Meeting on the Request for Information (or RFI) on the National Flood Insurance Program's Community Rating System Redesign effort. My name is Hunter Gray, and I am providing some technical housekeeping information and a preview of the agenda for today's session.

We are hosting this public meeting to gather input on the RFI published in the Federal Register on July 11th, 2024. The RFI seeks information on how FEMA can better serve communities through the National Flood Insurance Program's Community Rating System, also known as the CRS program. Specifically, the RFI seeks further input on suggested alternative program features and approaches for a redesigned CRS program, based upon public input from the [August 23, 2021, "Request for Information on the National Flood Insurance Program's Community Rating System"](#)¹ published in the Federal Register.

Slide 2 – Technical Housekeeping

Hunter Gray: Please note that this public meeting is being recorded, and a transcript will become part of the public record. Continued participation in this public meeting constitutes your consent that your name may appear on the official transcript for the record. If you are a member of the media, nothing said on this call is attributable to FEMA. Please direct your request to the FEMA Press Office at FEMA-News-Desk@fema.dhs.gov. The FEMA News Team will help you.

I would like to provide a brief orientation to some of the controls and functions available for today's webinar. On the bottom of your screen, you will find the meeting controls. This event includes closed captioning for those who may need it. You can turn on the captioning by clicking on the *Show Captions* (or *CC*) icon and making any adjustments you need. We will also post a link in the chat in order to view captions in a browser window if you prefer.

American sign language interpretation is also available and can be accessed either by clicking *Interpretation* icon from the webinar controls and then clicking *American Sign Language* or you can see the video pinned on your screen.

¹ <https://www.federalregister.gov/documents/2021/08/23/2021-18167/request-for-information-on-the-national-flood-insurance-programs-community-rating-system>

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Note that language interpretation is only available if you join the meeting from a computer and it's not available for those joining by phone. Live spoken language interpretation is also available in Spanish and can be accessed by clicking *Interpretation* icon from the controls and clicking *Spanish*. To hear only the audio for Spanish, click *Mute Original Audio*. Again, language interpretation is only available if you join the meeting from a by computer; not for those joining only by phone.

The purpose of this meeting is to seek general feedback on FEMA's programs. Individuals cannot apply for assistance or received information regarding a pending assistance request as a part of the meeting. If you are seeking assistance from FEMA, please call the FEMA helpline at 1-800-621-3362 or TTY-800-462-7585 to apply or receive information on a pending request.

We ask that you please use the Question & Answer window to reach out for help with technical difficulties. Hosts will respond to technical questions through that window. Please note that submission through the Q&A window will become part of the public record. Keep an eye on the Chat window for any messages we may need to broadcast to all participants.

By default, participants are disabled from speaking during the presentation portion of the public meeting. Due to the limited timeframe of the meeting, the verbal comment portion of today's meeting will allow only those who registered in advance an opportunity to provide comments on the RFI for a limited amount of time. Registered speakers will be limited to approximately two minutes, and time permitting, speakers who had not previously registered may be permitted to give verbal comments. We ask that those who registered to speak ensure that their Zoom username matches the first and last name used for the registration.

For those who registered to provide verbal comments during today's session, please note that users must join today's webinar with the Zoom desktop app or mobile app to provide verbal comments. Due to technical limitations, you will not be able to provide verbal comments if you join the webinar by phone audio-only. Toward the end of the public meeting, and as time allows, there may be an open comment period for interested individuals to provide additional verbal comments.

We will also provide a link in the chat box to the NFIP CRS website, which has materials for your reference about the CRS program.

Slide 3 – Agenda

Hunter Gray: Let's take a moment to review today's agenda. First, we will hear opening remarks from FEMA's Hazard Mitigation Directorate leadership. After that, we'll provide an overview of the CRS Program presented by FEMA's Floodplain Management Division. From there, we'll provide an overview of the programmatic review and improvement effort for the CRS program called "CRS Redesign."

Once the introduction information has been provided on the current CRS program and the CRS Redesign effort, we'll explain the instructions for providing written comments through the Federal Register RFI during this open comment period. Comments can be submitted until September 9, 2024.

The majority of the remaining time on today's public meeting is reserved for verbal comments for the record on the CRS Redesign RFI. We will review all the details about how to provide verbal comments during this meeting before we open the floor for verbal comments. We'll conclude with a few closing remarks.

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Slide 4 – Today's Presenters

Hunter Gray: Today's presenters include: Eric Letvin, FEMA Deputy Assistant Administrator for the Hazard Mitigation Directorate and Shilpa Mulik, FEMA Floodplain Management Division, CRS Redesign Program Manager. And now, I am going to hand things over to our first speaker, Eric Letvin.

Slide 5 – National Flood Insurance Program Community Rating System (transition slide)

- **Eric Letvin:** Hunter, can you hear me okay?
- **Hunter Gray:** We can. Thank you Eric.
- **Eric Letvin:** Hello, and welcome to the Public Meeting on the Request for Information (or RFI) on the National Flood Insurance Program's Community Rating System Redesign effort. As Hunter mentioned, FEMA is currently obtaining feedback on suggested program alternatives to the Community Rating System (or CRS) through a Request for Information (or RFI) published in July. I want to provide you with a brief background and context on the National Flood Insurance Program [NFIP] and the CRS.

The NFIP is managed by FEMA, and it provides federally-backed flood insurance to property owners, renters, and businesses. Today, approximately 22,600 communities across the country participate in the NFIP. In order for those communities to participate in the NFIP, FEMA requires them to adopt and enforce minimum floodplain management standards.

The idea behind CRS is to incentivize communities to adopt measures that reduce the risk of flood damage beyond the minimum requirements of the National Flood Insurance Program through premium credits.

In the last five years, FEMA has engaged in various strategic initiatives – including CRS Redesign - and has been coordinating these transformation efforts to build an enduring National Flood Insurance Program. As the NFIP depends on federal leadership it empowers state and local officials to take steps to mitigate their flood risk with collaboration as a focal point.

This partnership is a two-part equation encompassing the thought leadership FEMA provides, and the work communities and policyholders are doing to increase the nation's resilience to flooding. The CRS is a prime example of how communities are working to increase flood mitigation practices nationwide. Through the CRS Redesign initiative, FEMA is reviewing opportunities to further promote enhanced resilience efforts through the CRS program.

Today's meeting is an opportunity to provide your comments on the suggested program alternatives to the CRS program. These public meetings are designed to allow our stakeholders, and the general public to learn more about this effort and to allow the opportunity to provide input. Please note – due to a high level of interest in today's meeting, we will accommodate as many registered speakers as we can fit within the proper time period.

I want to thank you for taking the time to participate in this process and help make the CRS program sustainable and beneficial for many years to come. And now, I'm going to hand things over to Shilpa Mulik, the CRS Redesign Program Manager, to provide an overview of the CRS Redesign effort and further information on how you can provide input on the suggested program alternatives.

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Slide 6 – NFIP CRS – Overview (transition slide)

- **Shilpa Mulik:** thank you, Eric. Hunter, can you hear me?
- **Hunter Gray:** Yes, we can hear you, Shilpa. One moment. Okay, there we go, you're all set.
- **Shilpa Mulik:** Okay. Hello, and thank you for joining today's this Public Meeting for the National Flood Insurance Program's Community Rating System's Redesign Request for Information. We abbreviate these as NFIP and CRS.

My name is Shilpa Mulik, and I am the Program Manager for the CRS Redesign effort. I will be providing you with a brief overview of the current CRS program and then speaking about the CRS Redesign effort.

Slide 7 – What is CRS?

Shilpa Mulik: The CRS program was designed to empower and incentivize communities to take actions that go “above and beyond” the minimum floodplain management standards of the NFIP and to reward and incentivize those actions. The program's original intent was to reduce and avoid flood damage to insurable properties, strengthen and support the insurance aspects of the National Flood Insurance Program, and foster comprehensive floodplain management.

The program was premised on the belief that communities are best positioned to develop the most effective approaches to local flood problems. Authorized by Congress in 1994, the CRS program offers many benefits to participating communities. CRS discounts currently range from 5% to 45% and are calculated based on a community's credit points obtained through various flood risk management activities.

Other benefits include increased opportunities for property owners to understand flood risk, reduced damage to property, technical assistance for some community activities, and incentives to maintain and improve flood programs over time.

The CRS program offers credits to communities based on implementing approved floodplain management activities. These activities are organized into four categories that provide a sense of the range of what's possible to earn credit for under CRS today. These categories are public information, mapping and regulations, flood damage reduction, and warning and response.

To give you a better understanding of the scale of the current CRS program, as of April 2024, there are approximately 1,500 communities participating in CRS across the U.S. And there are over 3.5 million policyholders in these CRS communities, which account for more than 75% of all NFIP flood insurance policies.

Slide 8 – CRS Redesign – Overview (transition slide)

- **Shilpa Mulik:** Now, I will speak a bit about the reason we are pursuing the CRS Redesign effort at this time.

Slide 9 – CRS Redesign Overview

- **Shilpa Mulik:** CRS Redesign is a multi-year effort intended to take a comprehensive look at the CRS program, exploring both incremental improvements and bold shifts in approach. This was launched in 2022, and the project aims to revamp the CRS programmatic framework, potentially including revisions to the rating system's scoring and operational elements.

CRS Redesign is FEMA's way of addressing stakeholder's feedback on the current CRS program. The Redesign effort is a way for the public to have input on the future of a prominent flood-risk reduction and

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money-saving program. In sum, we have heard your feedback and are once again speaking to our partners and stakeholders to determine the best path forward for the future of CRS.

Slide 10 – Why CRS Redesign?

- **Shilpa Mulik:** As mentioned earlier, the CRS Redesign effort is intended to take a comprehensive look at the CRS program, exploring both incremental improvements and bold shifts in approach. We did not arrive at this place by accident. CRS Redesign is, in part, a response to the overwhelming volume of feedback received from stakeholders in the last few years, including from the Request for Information in 2021.

CRS has always been a highly valued program with a solid reputation with communities and stakeholders. But we want to be mindful of those positive experiences and carefully consider any impacts that would result from a total overhaul of the program. CRS Redesign also reflects ongoing transformations in FEMA and the NFIP aimed at increasing equity and climate resilience.

There have been many important advances since the program's inception over 30 years ago. There has also been continuous learning about flooding and flood risk reduction techniques. We understand more today about risk and the techniques to manage risk, and the technology available to us has dramatically improved in the last 30 years.

We also know more about multi-frequency analysis, pluvial flooding, climate change, and the extent of flood risk outside of the Special Flood Hazard Area or "SFHA." Another important factor that we're considering during the CRS Redesign process is a report from the Government Accountability Office (or GAO) which was published in July 2023. GAO presented several findings about the CRS program as it currently operates.

Slide 11 – GAO Recommendations

- **Shilpa Mulik:** The GAO report used their findings to provide two recommendations to the CRS program: First, to adjust CRS by calculating a community's rating based only on community activities that reduce flood risk and by incorporating discounts into the full-risk premium based on the actuarial evaluation of risk reduction.

And second, to evaluate other means for incentivizing desirable community activities that cannot be actuarially justified but are currently a basis for discounts in CRS.

Both of these recommendations are being considered through the CRS Redesign effort. That said, we have heard from internal and external stakeholders about opportunities to improve and occasional – and thoughtful – criticism. All of these factors together paint the picture of why FEMA must undertake the CRS Redesign to remain consistent with other change efforts and stakeholder feedback.

Slide 12 – FEMA is following a deliberate and analytical process to redesign CRS

- **Shilpa Mulik:** Next, I'd like to take a moment to talk about where we are in the overall lifecycle of the project, what we've accomplished so far, and what we're focused on for this year. We've said it already and we'll say it again - CRS Redesign is a multi-year effort. We are doing this because taking a deliberate and intentional analytical approach ensures that the future design and features of CRS are founded on rigorous data-driven and evidence-based decision making.

The evaluation process we're undertaking is the second phase of the larger CRS Redesign journey. We are executing an intentional process that centers around a deliberate and analytic approach to program redesign.

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As we look ahead, FEMA will use the evaluation findings to initially select a program design in FY25 for further consideration with the goal of focusing on implementation planning in 2026. No changes will be made to the CRS program until at least 2026.

It is important to note that with whatever program design is chosen, FEMA is dedicated to providing ample time for communities to prepare for the implementation of the redesigned program. Once the multi-year redesign process concludes and the new program is finalized, FEMA will allow a minimum of 18 months for communities to make any necessary adjustments and successfully implement the program.

This extended timeline offers communities the opportunity to plan, adapt, and ensure a smooth transition to the revamped CRS, promoting a more efficient and effective floodplain management approach.

Slide 13 – Goals of the Redesigned CRS Program

- **Shilpa Mulik:** One of the first milestones completed in the CRS Redesign process was establishing goals for the future program. These goals were developed based on stakeholder feedback about the current CRS program with input from FEMA experts and NFIP executives. The following goals have been established for the redesigned CRS Program.

Goal 1: Incentivize communities to take measurable actions and make sustained progress that reduce current and future flood risk.

Goal 2: Embed equity as a foundation of the CRS program.

Goal 3: Incentivize communities to promote property owners to purchase flood insurance to reduce their financial risk due to flood.

Goal 4: Deliver a participant-centered and modernized program.

Slide 14 – How to Provide Feedback on CRS (transition slide)

- **Shilpa Mulik:** So now that I've centered you around the progress we've made in the CRS Redesign effort and the focus of our current work, I'd like to transition to the engagement portion of today's presentation.

Slide 15 – Based on previous stakeholder feedback, FEMA is considering alternative ways the CRS program could be designed

Shilpa Mulik: Based on previous stakeholder feedback, FEMA is considering suggested alternative ways for the CRS program to be designed. Stakeholder engagement questions consider the following suggested features: automatic enrollment, premium surcharges, risk-based premiums and CRS discounts, exchanging individual benefits for community benefits, enhanced technical assistance, simplification of CRS, and multi-jurisdiction CRS participation.

Slide 16 – Give FEMA your input on suggested CRS program alternatives

- **Shilpa Mulik:** Next, we're going to spend a few minutes talking through how we're engaging the public on this effort and how you can participate. We will be providing multiple opportunities for stakeholders and the public to provide inputs throughout the CRS Redesign initiative. FEMA has issued a Request for Information to receive input from the public on transforming the Community Rating System under the NFIP to better align with the current understanding of flood risk and flood risk approaches and to incentivize communities to not only manage but also lower their flood risk through floodplain management initiatives and to support the sound financial framework of the NFIP.

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You may submit comments, identified by Docket ID: FEMA-2024-0022-0001, through the Federal eRulemaking Portal at www.regulations.gov. All submissions must include the agency name and Docket ID for this notice. For access to the docket to read background documents or comments received, go to <http://www.regulations.gov> and search for the Docket ID. Written comments are requested on or before September 9, 2024. For any comments, we ask you to identify the number of the specific question or questions to which you are responding.

Slide 17 – Instructions for verbal comment

- **Shilpa Mulik:** We will now move into the verbal comment portion of our meeting. Members of the public who, during registration, indicated an interest in providing verbal comments will be given the opportunity to speak. As a reminder of what Eric mentioned earlier at the top of the meeting, please note that due to a high level of interest in today's meeting, we will accommodate as many registered speakers as we can fit within 2-2.5 hours. If you registered to speak and due to time limitations we do not get to you during today's meeting, we encourage you to sign up to provide verbal comments at one of the other public meetings. We would also like to remind everyone that written comments may be submitted through [regulations.gov](http://www.regulations.gov). Speaking order is determined by the date of submission in chronological order of registration, and we will be using a timer to stay on track. Moderators will call two names: the first will be the current speaker and the second will be the speaker on-deck. When your name is called, please use the *Raise Hand* function to indicate your readiness to speak. A moderator will then invite you to unmute your microphone. Once your mic is unmuted and you are ready to speak, please state your name for the record and that you are ready to speak. Each speaker will have approximately 2 minutes to speak, and the timer will begin after you have been acknowledged by the moderator to speak. The moderator will say, "We hear you, [your first name], your time for verbal comments begins now."

If time allows, after all registered speakers finish providing verbal comments, we will invite other meeting participants who have not yet spoken to indicate an interest in speaking by clicking "Raise Hand" and submitting a note to moderators in the Q&A window.

We anticipate having more people who would like to provide comments than we have time for today. In the event, you would like to provide verbal comments for the record and there is not enough time for you to comment, we are holding two more public meetings – tomorrow, August 22nd from 3:00 to 4:30pm eastern and Tuesday August 27th from 3:00 to 4:30pm eastern. We also welcome your written comments, which can be submitted via the Federal eRulemaking Portal through September 9.

Unfortunately, as was stated on the registration page for this event, anyone who has dialed in by phone will be unable to provide spoken comments at this time. If you have dialed into this meeting by phone and wish to provide a comment, please submit a written comment online at www.regulations.gov and insert FEMA-2024-0022-0001 in the search function.

Now, I will invite Hunter Gray to facilitate the verbal comment portion of this meeting. Over to you Hunter, thank you.

- **Hunter Gray:** Great, thank you Shilpa. Okay. As we move on here are the names of our first two speakers for today. Kimberley Pirri, you will be up first to speak, and following Kimberly, we have Janet Meshek. Let me see if Kimberley Pirri is on and able to speak.

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Verbal Commenter #1

- **Kimberley Pirri:** Hunter this is Kimerley.
- **Hunter Gray:** Yes, we can hear you.
- **Kimberley Pirri:** Hello. I didn't realize I mentioned that I wanted to provide verbal comment. I do not have a comment at this time.
- **Hunter Gray:** Ok, thank you. Let me do one thing to switch who is signing for us. Okay. And then after that, I believe we have Janet Meshek up next. And then after that, it is Roderick Scott. Janet are you ready?
- **Janet Meshek:** Now can you hear me?
- **Hunter Gray:** Yes, we can hear you now. Are you ready?
- **Janet Meshek:** I am afraid I am in the same situation. I didn't realize I signed up to make comments, and I don't have any right now.
- **Hunter Gray:** Okay. All right. We have Roderick Scott up to speak now, and Tom McDonald is slated to follow him. Roderick, are you ready to speak?
- **Roderick Scott:** Yes, can you hear me?
- **Hunter Gray:** Yes, we can.
- **Roderick Scott:** Thank you very much, and thank you, FEMA for enabling these listening sessions, it's very important. My name is Roderick Scott, I am the board chairman of the Flood Mitigation Industry Association. We are the product manufacturers and service providers that retrofit buildings and help with deployable flood control products that help create flood resilience in our communities. I will just go down the bullet list of the items that we are to be talking about. Should FEMA enroll all NFIP communities as a pre-enrollment for CRS? Yes. The threshold for getting into the program is much too cumbersome for small and medium-sized communities. They don't have the revenues to even put dedicated staff to it and certainly can't afford consultants to help them. We should at least get them into the program.

The second one, if FEMA were to provide NFIP discounts for individual policyholder activities, should they also provide discounts for the whole community? Yes. The issue is, in NFIP 2.0, the current NFIP iteration we are in, the mitigation discounts that we enjoyed or that we are able to convince people to retrofit their buildings to be able to realize those benefits of reduced premiums for a return on investment have disappeared virtually. We are at \$100 or \$200 difference if you spend \$250,000 on building or don't spend a dime on your building. We are midway to actuarial risk rates. We have a decade left. The banks tell us that in 20 years, we can anticipate a 40% devaluation on millions of buildings and trillions of dollars of assets. We must have mitigation discounts for the individual actions as well as the community getting more recognition because the CRS program is always had kind of a handicap towards credits for other activities that reduce flood risk but not for the activities that get buildings compliant for the NFP and for the minimum elevation requirements, which is the only way they will survive economically into the future and continue to provide shelter and revenues to make everything else go around.

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- **Hunter Gray:** Just a reminder of the time. Please try to conclude your comments.
- **Roderick Scott:** Yep, we need to have the CRS recognize numbers of retrofits or percentage of the community pre-FIRM buildings that have been retrofitted for credits. We just never have achieved that in the CRS. Thank you for this opportunity. That is the end of my comments.
- **Shilpa Mulik:** Hunter you are on mute.
- **Hunter Gray:** Sorry, Roderick thank you for speaking and thank you for that note Shilpa. Okay. Thank you, Tom. Next to speak is Lisa Sharrard. Lisa, let us enable – let us know when you are ready to speak. And then Marcia Steelman, you are on deck next.

Verbal Commenter #2

- **Hunter Gray:** Thank you for speaking. Up next to speak is Tom McDonald, and following Tom McDonald on deck is Lisa Sharrard. Tom, are you ready to speak.
- **Tom McDonald:** My name is Tom McDonald. I work for the city of Savannah Development Services Department and CRS coordinator. I wasn't really prepared to talk, but one of the things that you were mentioning was since some of the incentives for elevating have been removed by the new Risk Rating 2.0 there might be the benefit for adding additional points to some of the more actives – protection measures for building such as vents or elevating or elevating the AC unit at least to do the design flood elevation that you are able to get more points for those actions, and that way you can get discounts from the risk rating 2.0 through your community's class. Right now, that is mainly all I have.
- **Hunter Gray:** Thank you Tom. Okay, next to speak is Lisa Sharrard. Lisa, let us enable – let us know when you are ready to speak. And then Marcia Steelman, you are on deck next.

Verbal Commenter #3

- **Lisa Sharrard:** Hi. This is Lisa Sharrard. I did put a comment in the comment section. We give – CRS gives a lot of credit for activities that communities have no intentions of implementing approved plans or paper exercises that don't really get utilized. They do it for the points. But other than that, they are paperweights. What I would like to do is see CRS give credit for actual implementation rather than just having a paper representation. So, if we could set up milestones or something that shows that they are actually trying to implement a repetitive loss plan that they have, that they are applying for grants. There are some communities that will do the plans and they just don't have any intentions of implementing them. I think if we can show progress towards implementing those activities, we are going to see more results and better benefit for CRS and the discounts.

Some of the activities in CRS, it's a lot of paperwork. Perhaps some of this verification could be rolled into the community assistance visits so there's not two audits done on duplicate activities. And I think perhaps by doing it that way we might see some more participation, if it is less of a commitment of time and energy by having two separate audits, one through the community assistance bit audit and then the CRS audits. That's all I have.

- **Hunter Gray:** Okay, thank you Lisa for your comments. Next is Marcia Steelman. And then after that, Ayita Lonergan is on deck. Marcia, are you ready to provide comments?

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Verbal Commenter #4

- **Marcia Steelman:** Yes, can you hear me?
- **Hunter Gray:** Yes, we can.
- **Marcia Steelman:** I, in the sake of the time we have, I concur with the comments of the previous speakers. I just would like to mention a couple of things, recommendations on the report. It has to do with the CRS. First, the concern I have is that we don't have enough credits related to our actual building code, having a strong building code, that's what we have in Florida. And we really, for the amount of effort we put on those, you really don't see the program rewarding it enough. Most of our points actually come from environmental things we actually implement because we are close to the Everglades and we have two national parks in our particular community. So many of those activities get implemented by the County, by the state surrounding the national Park. But those don't help at all in terms of flood protection in our area. They are important for us, important for tourists, important for the economy, but they don't really represent savings in terms of flood protection or insurance because they don't affect the urban area and they don't affect the insurance. So, I think that is a little bit of a disconnect. I don't want it to be rewarded less, but I do think the built environment should have a bigger weight in the CRS than it actually has now. These are the main comments I have now.

Other issue is the affordability of flood insurance and it's mostly an issue that has more to do with the NFIP, not really about CRS. Most of us do not get insurance to the NFIP because the cap is \$250,000. And those that are in this range are not being able to afford flood insurance. We have a problem there.

- **Hunter Gray:** Please try to conclude your comments.
- **Marcia Steelman:** That is the main issue I have. I would like to have the built environment have a bigger weight to get credited, particularly related to the building code activities.
- **Hunter Gray:** Okay. Thank you, Marcia. Thank you for your comments. Next, speaking next is Ayita Loneragan. On deck is John McLean. Ayita, are you on? If so, please raise your hand

... It doesn't appear Ayita is on. John, are you on?

Verbal Commenter #5

- **John McLean:** Hello, can you hear me?
- **Hunter Gray:** Yes, we can. Your time starts now.
- **John McLean:** I appreciate it. I am a resident of Fort Myers Beach. We went through some pretty significant impacts after hurricane Ian. We are all working very hard to rebuild and appreciate, quite frankly, the assistance, especially directly after the storm.

The comment I wanted to make was that our town and some of the surrounding communities were stripped of our – we have a 25% – I don't remember the rating but it resulted in a 25% discount. That was stripped from us without really any explanation as to where we were deficient. And I know that the town had been working very diligently to try and ensure that all the rules were being followed right from the get-go.

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Since that has occurred, it appears that through escalation, there is now some dialogue and some discussion that is occurring, which is very positive. However, that's not the way this started, and it's very disappointing to see that lack of communication, and quite frankly, what felt very punitive to a neighborhood and a community that had undergone such difficult times. That's my comment.

- **Hunter Gray:** Thank you for your comments, John. Up next to speak is Greg Saxe. Greg, are you on? If so, please raise your hand ...

All right. Up next, we have Kelli DeFedericis. ...

Okay. It appears Kelli is not online at the moment. Next up, we have James Paggioli. James, are you ready to speak? And next up would be Matthew Levi.

Verbal Commenter #6

- **James Paggioli:** Can you hear me?
- **Hunter Gray:** Yes, your time begins now.
- **James Paggioli:** Very good. My name is James Paggioli. I would like to echo many of the same as previously stated. I would like to see simplification, especially on county levels. Case in point, we have much more open space, and quite frankly, we have the area of many municipalities within our county. We don't seem to get the same proportional benefit that they might have. One of the things I would like to see is an adjustment perhaps to the open space and those types of [activities] reserving land for those issues and conservation issues, whether they be easements or in fee submissions. Other than that, I'll leave it because I think everybody else is going to hit many of the same issues, simplification and proportional.
- **Hunter Gray:** Okay. Thank you for your comment. Up next is Matthew Levi. Matthew, are you ready to provide comments?

Verbal Commenter #7

- **Matthew Levi:** Can you hear me?
- **Hunter Gray:** We can, your time begins now.
- **Matthew Levi:** My name is Matthew Levi, floodplain administrator for Ashe County North Carolina. We are a small, rural jurisdiction. We don't have the budget or the staff members to implement CRS, nor do any of the adjacent counties. I would like the whole CRS program to be easy enough for it to be administered in a small jurisdiction. Thank you.
- **Hunter Gray:** Okay. Thank you for your comments. Up next we have Elena Divino. Elena, are you on and ready to speak? ... It does not appear Elena is on at the moment.

Christina Rimes is up next. Christina, are you ready to provide comment? ... Christina, you are on. You may need to unmute yourself if you are able to speak and ready to provide comment. ... Okay. We will move on to the next person.

Kelsey Whidden, would you like to provide comment?

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Verbal Commenter #8

- **Kelsey Whidden:** I'm sorry, can you hear me?
- **Hunter Gray:** Yes, we can, your time begins now.
- **Kelsey Whidden:** Thanks, I'm Kelsey Whidden. We are a county in Central Florida that has a population just over 100,000. I would consider us fairly rural well, like the commenter before. We don't have the funding or the staff available even in our size to devote one person to be a CRS coordinator. I would like to see the CRS program be more open to smaller municipalities because ultimately, that's what's going to be of a benefit to our community members. It seems that it's a pretty in-depth process. I've just come on to the floodplain management world in the last eight months, and truthfully, it is at the bottom of my list of things I can even take on right now as a floodplain manager and the other hats I'm wearing. That would be something that I would strongly urge in the overhaul. That is the end of my comments.
- **Hunter Gray:** Thank you for your comments. Up next is Katie Hollingshead. And after that is Elizabeth Leibold. Katie, are you ready to speak and provide comments?

Verbal Commenter #9

- **Katie Hollingshead:** Yes, can you hear me?
- **Hunter Gray:** Your audio is working. It is a little bit hard to hear you volume wise. ... Do you want to try again?
- **Katie Hollingshead:** Is that better?
- **Hunter Gray:** Yes, that is. Thank you.
- **Katie Hollingshead:** I echo the comments previously. I am a floodplain administrator in Springmill, Arkansas. And while we do have a good CRS program, it is difficult to implement our city's less than 100,000. It does provide benefits, but it would be – it would just be nice to see a little bit more out of the program for cities that kind of – I don't know may be rewarding cities that don't have flooding issues to start with. That's all.
- **Hunter Gray:** Okay. Thank you for your comments. Elizabeth Leibold, you are up next. And following that would be Whitney McNamara. Elizabeth, are you ready to provide comments?

Verbal Commenter #10

- **Elizabeth Leibold:** Can you hear me now?
- **Hunter Gray:** We can hear you now.
- **Elizabeth Leibold:** Oh goodie. Sorry. So, I would have some sympathy for the smaller jurisdictions. This is Elizabeth I work at the city of Tucson. I have been doing CRS coordinator position for I'm not sure, maybe 15 years or longer. I have a lot of experience in this. It is a lot of effort to participate. It does only take a few hours here and there to do it, so you don't necessarily need somebody available all the time. But it does take a lot of upfront to read the whole Manual, understand it, go to training on it which I highly recommend. So, I don't think that we should have automatic enrollment, absolutely not. It needs to be a community decision based on what they want to do. Or provide a mini type program with smaller discounts if they can't

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participate in the bigger program.

Regarding premium surcharges, this is very important. We have way too many Congress-added, last-minute extra fees. And I really feel resentful. As a CRS coordinator, I should be able to have the discounts applied to all of these extra fees that Congress are adding. That's not fair to the constituents that are getting a discount on a portion of their premium, but these additional fees that are being added last-minute by Congress are not being discounted. That absolutely must change. And there's no argument for it. It needs to happen, it needs to apply.

Risk-based premiums and discounts – I think there's various activities that we need to look at to update the 600 Series in particular needs to have a little bit more clear understanding of the set-up of what needs to happen to get those points. And then regarding multijurisdictional participation, that also needs more clarification because a County flood control District shares some points with local communities, but that needs to be clarified more in the verbiage in the Manual on how that can happen. Those are the topics of interest to me.

Simplification of CRS. ...

- **Hunter Gray:** Please be mindful of time and conclude your comments soon.
- **Elizabeth Leibold:** There are many different kinds of activities, so simplifying it will be difficult, but I would like to see simplification. Thank you.
- **Hunter Gray:** Thank you for your comment. Up next, we have Whitney McNamara. Let me see if Whitney is on. Whitney, if you are on, please raise your hand. ... It does not look like Whitney is on.

Carolyn Steffan, are you on? If so, please raise your hand. ... It does not look like Carolyn is on either.

Next up is Randy Daniel. Randy, are you on and ready to provide comments? ... Randy, you may need to unmute your microphone. You should be allowed to speak now. Okay. Come back to us later if you still would like to provide comment. We are going to move onto the next person.

Next up would be Vince Seijas. Vince, would you like to provide comment?

Verbal Commenter #11

- **Vince Seijas:** Yes. I just wanted to echo a few comments I have heard. The CRS program points system needs to be regionalized. In areas without dams or levees, other activities should have more points awarded. Lowering the substantial improvements, substantial damage threshold or tracking substantial improvement in substantial damage over a longer period of time needs to be awarded more points.

Risk rating 2.0 is critically flawed. You have payouts that are based on replacement cost, yet the payouts are still not replacement costs. It is still \$250 max., I see that as an issue.

Mitigation for other forms of disasters like hurricanes and wind still accounted against. For SI and SD, you are essentially punishing mitigation efforts in communities that track SI and SD. This needs to find some sort of exception when you are mitigating against another hazard.

CRS discounts are dwindling, and thus, the elected bodies that helped fund us through budgets are less

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willing to fund CRS coordinators or staff. This is something that needs to be addressed and recognized.

If a discount is not provided directly to a person that is paying the policy, you will eliminate essentially the incentive of the elected body to even invest in the staff for the higher standards. Basically, some of these things are creating an impossible environment. And the perception, clearly, is that the CRS program is either going to go away or there is really not a will to maintain it.

There is another issue when it comes to recertification and rating when we sit down with some of these reviewers from the bodies that review. ISO is the one that pops to mind locally. Rating and point awarding metrics need to be made more available. Okay, sometimes the determinations feel or appear capricious and arbitrary. Not all the criteria are in the CRS Manual when dealing with reviews. So, it appears that there is some kind of secret guide out there and instead of getting the 200 points or the 100 points, You get a piece of that, and you're left holding the bag after the review. And then you have to go again to Council and tell them, hey, we're not going to be able to meet the goal or maintain the rating we have had. For example, we had to redo the repetitive loss check even though no development has occurred, and any that has is obviously to the new, higher standards we have adopted, but we are not getting credit for that. Those are some of the critical flaws I would like to mention. There is enough mistrust of government already in this toxic environment.

- **Hunter Gray:** Please be mindful of time and conclude your remarks soon.
- **Vince Seijas:** Yes, I will complete my statement momentarily.
- **Vince Seijas:** Providing the discount to a municipal government, or a body to do some kind of grant, will just slap those people paying the policy in the face. Folks we have to think this out a little better and actually deliver on the promises. That is all I have. Thank you very much. Vince Seijas, City of Doral.
- **Hunter Gray:** Next up is Conn Cole. If you are on, please raise your hand. ... It does not appear that Conn is on.

Next is Gary Beswick. Gary, are you on and ready to provide comment? ... It does not appear that Gary is on.

Next is Lauren Brinkman. Lauren, are you on and do you want to provide comment?

Verbal Commenter #12

- **Lauren Brinkman:** Hi, can you hear me?
- **Hunter Gray:** We can, your time starts now.
- **Lauren Brinkman:** This is Lauren Brinkman. I am the floodplain administrator in the city of Mandeville in Louisiana. I'm also part of LFMA, it's our state Floodplain Management Association. It's really important that I came to talk today just to make sure that with having verbal comments, that I am able to give some feedback.

One thing that I know in Louisiana is our land is low. We do flood. I feel like the CRS program is something that is looked at nationally, so you have to look at all communities differently. With that being said, with me being part of a city and not having points for certain things like larger open space and maybe even some drainage incentives and us not having levees here, things that we really gather a lot of our points on are the

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high regulatory standards as well as elevations. We are a historic community that we want to preserve these historic homes, so we actually elevate these homes. A lot of the homeowners here do it voluntarily to protect their homes. And whenever I have heard that there could be possibly receiving double discounts for the same CRS activity whenever we refer to freeboard and elevation, those are two completely different things. Freeboard is something that is put into place as just a higher standard above just a regular base elevation. So that would be for new construction and everything else just as additional standard to kind of follow. Elevation, that is something that we are incentivizing our residents to want to do better, to want to protect the property, and to take that away as considering those two as double points I feel would be unrealistic and extremely sad to the property owner in the community that wants to enforce the higher standards. I feel like the community should be given the points as well as the individual property owner for taking the time to care about their property and to help mitigate their property. I am done with my comment.

- **Hunter Gray:** Thank you for your comments. Next up, we have Elizabeth Smythe. Elizabeth, are you on and ready to provide comments? You may need to unmute. Elizabeth, we can't hear you yet. There you go.
- **Elizabeth Smythe:** I just got on and I'm not even up to speed with what you all are talking about. I am so sorry.
- **Hunter Gray:** Okay, that is all right. Next up, we have Monica Farris. Monica, are you on and ready to provide comment?
- **Monica Farris:** I am on, but I will submit my comment via online. Thank you very much.
- **Hunter Gray:** Thank you, Monica. Okay. Next up is Leroy Thompson. Leroy, you are on? Please raise your hand. ... it does not look like Leroy is on.

Next up is Randy Neprash. Randy, are you ready to provide comments?

Verbal Commenter #13

- **Randy Neprash:** Hi, I am Randy Neprash. Can you hear me? I work with the Minnesota Cities Stormwater Coalition. Can you hear me?
- **Hunter Gray:** Yes, we can.
- **Randy Neprash:** Excellent, Thank you. I work with local stormwater programs, specifically cities that hold EPA MS4 stormwater permits. These cities play important roles in managing localized flooding from intense rainstorms in particular. But their work is partly understood by federal agencies, including FEMA, NOAA, and EPA. For most of the U.S., more of our rainfall is now coming in these intense storms. We hear about such storms in the news all the time now. I'm going to briefly address a couple of topics with the hope that FEMA staff will follow up by contacting me for more information.

About 6,500 American cities are covered under MS4 stormwater permits, including more than 80 percent of the country's population. The requirements for these permits cover many of the goals and credits enumerated in the CRS program, and yet, the CRS program does not link the CRS credits with the MS4 permit requirements or a city's permit compliance. In the 2021 Manual Addendum, the regulatory standards section was eliminated. This is all astonishing and inefficient. It should be fixed.

City stormwater programs make extensive use of hydraulic and hydrology modeling ("H&H modeling"). The

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manual makes frequent and direct references to modeling, specifically in relation to design storms and plan review. The manual, though, shows a remarkably incomplete knowledge about how H&H modeling works and is used by cities. There is no information, for example, about cities using full system H&H models to identify and rectify flooding problem areas in advance of when these new, more intense rainstorms hit and catastrophes happen. There is no reference to how the numbers user for various design storms (10-, 25-, 100-year storms) are derived, NOAA's Technical Paper 40, Atlas 14, or the soon to be released Atlas 15. There are also no references to whether cities use modeling to estimate cumulative impacts or resolve neighborhood-level problem areas. All of these issues should be addressed. Thank you.

- **Hunter Gray:** Thank you for your comments. Next on, we have – first, let me do one thing. Okay, next up, we have Lourdes Rodriguez. Lourdes, are you on and ready to provide comments. ...

Verbal Commenter #14

- **Lourdes Rodriguez:** Hi. Good afternoon. I have been in the CRS world since the late '80s, early '90s when it first implemented. I have seen it getting more and more complicated as the years go by. I have noticed that sometimes the amount of effort that we put into it is really not worth the return. It has become very cumbersome.

I also have seen – at least in Miami-Dade county, and I echo a lot of people, Vince and Marcia, I work closely with them. Many things that the county does at the county level, it implicates a lot of – it runs down to all of the municipalities, and we are no longer getting those benefits as far as in points.

Also, a lot of paperwork gets a lot of points, and it also doesn't really change or make a difference within flood mitigation. And I think it has become a contest of who can get a better rate, who can do this. It has become sort of a status instead of what it is supposed to be for flood mitigation and actually for safety. So, I think that simplifying it would be very good.

Automatic entering into the program, I don't know – you'll get more participants, but I don't know if you will get many people doing anything. Again, it's just sort of a badge – “check this point off.” I think it has to be analyzed from the end user, more than from the other side. So, those are really my comments, and I hope to see how this continues to evolve. Thank you.

- **Hunter Gray:** Thank you for your comments. Next up, we have Kevin Deneault. I am not sure if I pronounced that right. Kevin, are you on, and would you like to provide comment?

Verbal Commenter #15

- **Kevin Deneault:** Can you hear me?
- **Hunter Gray:** We can.
- **Kevin Deneault:** Kevin Deneault. GIS mapping specialist with the city of Portland, Maine. Appreciate you putting this on, very helpful. I just wanted to make a couple of comments. I would like to make some recommendations to improve the CRS point scoring system by increasing the point values for communities that have additional shoreline zoning and regulations for both inland and along the coast. Ideally, it would benefit, provide further enhancement and protection and mitigation from future flooding. And that's all I have for today.

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- **Hunter Gray:** Okay. Thank you for your comments. Next up is Rick Buckeye. Rick, are you on? And would you like to provide comments? ... It does not appear Rick is on.

Next up is Christian Somers. Christian, are you on? And would you like to speak? You may need to unmute your microphone if you are trying to speak. Okay. We will try back again later. ...

Next up is Terry Sheffield. Terry, are you on and would you like to provide comments? We cannot hear you if you are speaking. You may need to come off mute. Okay. It looks like you should be able to speak, but we can't hear you if you are trying to provide comments. ... Terry, if you would like to provide comments, put those in the question and answer, and we will try to address that with you.

We will move on to the next speaker, who is DJ Hart. DJ, would you like to provide comments? ... DJ, if you are speaking, we can't hear you, but it does look like you are unmuted. I don't believe we can hear yet. DJ, if you would still like to provide verbal comments please put something in the question and answer, and we will try to resolve with you. ...

For the moment, I am going to pause us there. It looks like we have come – we have gotten through the list of folks who have registered to speak during today's session. Now, there are those that if you would like to speak but did not register to do so when you signed up to participate in this meeting, we would invite you to raise your hand using the function at the bottom of your window. That will get you into a queue to speak.

At the moment, the first person up that would be Nazar Nabaty and after that would be Pamela Tuft. Nazar, are you on and ready to provide comment?

Verbal Commenter #16

- **Nazar Nabaty:** Yes, sir. Can you hear me?
- **Hunter Gray:** Yes, we can. Your time starts now.
- **Nazar Nabaty:** Yeah, my name is Nazar Nabaty. I am the floodplain administrator with the City of Phoenix. We are trying to improve our classification. As of today, City of Phoenix is classified as [CRS] Class 5. We have enough points, we believe, to go to Class 4 or even Class 3, but we have run into the situation where we are dealing with a Federal dam as we are working through the prerequisite score on the 600 series. We are stuck between BLM² and CRS review because BLM, they are not willing to release the inundation map and emergency plans to us because of national security and cannot get this. I believe this is a punishment to us, that two federal agencies, they should have some mechanism, the plans are there, the emergency plans are there, everything. We should automatically get those scored to us without giving any effort from our end.

Even though we tried to make our own inundation map and emergency plans, but we need some information on those other dams. That is what I believe is not fair that the city has a lot of effort put into it to improve the classification and we're stuck. I would love to see any help in this matter and get us those points that we deserve to improve our classification. That definitely is going to help all of our city's residents to get more discounts on their flood insurance. Thank you.

² U.S. Bureau of Land Management

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- **Hunter Gray:** Thank you for your comments. Okay. Next up is Pamela Tuft. Pamela, are you on and ready to provide comments?

Verbal Commenter #17

- **Pamela Tuft:** Yes, I'm on. Thank you very, very much for this seminar or workshop. I look forward to reading comments when they come out. I'm a special projects manager and serve as CRS Coordinator for a community of 60,000 that has seven miles of a drowned river flowing through it. We have been a Class 6 since the mid-90s when I was floodplain administrator. We have spent way too much money on modeling, but it has been incredibly useful as climate change and sea-level rise. I would like to see – and we are now working on updating all of our FEMA FIRM panels with the new model to show the impacts of atmospheric rivers, storms which we are subjected to in the North Bay of San Francisco, in California.

But I would like to see – I agree with the last gentleman on dams. We have a public dam of low risk that we are no longer storing water on it, but I can't even get 1 points in [series] 600. Now that we have put it into decommission status and no longer hold water. I would like to see that offer a little bit more flexibility to allow public agencies with small dams to get some help on that.

We are working towards our Class 5, and I would like to see as we transition into your new program that those efforts over the last 20 years will not be dissolved and we have to start all over. So, I would hope that the change is a gracious change and that communities who are serious about their CRS rating are given the credit to ease into the new system with as much grace as we have worked at to maintain our Class 6 and are working on Class 5.

I would love to talk about RLL. There's something in that system that is broken. Trying to get parcels under that are on our RLL list that are not even in our jurisdiction - it has been pretty hilarious. I would like to see some work on that trying to deal with RLL corrections. Anyway, thank you again, and I look forward to the future.

- **Hunter Gray:** Thank you for your comments. Up next, we have Vesa or Peter Karttunen. Vesa or Peter, are you ready to provide comments?

Verbal Commenter #18

- **Vesa (Peter) Karttunen:** Yes, I am ready to provide comments. My question is, on how the potential violations are started. It seems like every time somebody asks for a CLOMR³, it starts off with a potential violation even when the structure has been built as per the standards that are in place and even with the state permits and everything else that has been done. When they start the CLOMR, it all seems to go back to potential violation. There's something that needs to change on how it is assigned to, it seems very arbitrary. That is all I have to say. Thank you.
- **Hunter Gray:** Okay. Thank you for your comments. Up next we have Dustin Willett. Dustin, are you on and ready to provide comments? Dustin, if you are speaking, we can't hear you, but it does appear that you are unmuted. I don't know that we can hear you get, Dustin. ... I am going to move on to the next person. Dustin,

³ A **CLOMR** is a letter from FEMA commenting on whether a proposed project, if built as proposed, or proposed hydrology changes would meet minimum National Flood Insurance Program standards. Source: <https://www.fema.gov/flood-maps/change-your-flood-zone/lomr-clomr>

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if you would still like to provide verbal comments, please post something in the Q&A box for us.

Next up is Zane Dunnam. Zane, are you on, and would you like to provide comments?

Verbal Commenter #19

- **Zane Dunnam:** I am on, thank you. I am a floodplain administrator in McClennan County, Texas. I'd like to provide three comments to the first three questions of the list of questions for commenters.

To the first question, should FEMA provide each community with a report highlighting potential CRS program credits? Yes. Such a report would be beneficial.

Number two, should FEMA auto enroll all NFIP participating communities into the CRS program? No. Not all NFIP participants desire to be part of the CRS program.

And lastly, number three, with there be any advantage if FEMA were to assess an escalating surcharge on NFIP policy premiums for participating communities that are not in compliance? No. Such escalated surcharges would be punitive in effect and many policyholders will start to complain, and all those complaints and time wasted with listening to those complaints will be directed to the local floodplain administrator. That's all I have. Thank you very much.

- **Hunter Gray:** Thank you for your comments. Up next, we have Debbie Vascik. Debbie, would you like to provide verbal comments.

Verbal Commenter #20

- **Debbie Vascik:** Yes I would, can you hear me?
- **Hunter Gray:** Yes, we can hear you.
- **Debbie Vascik:** I did just want to make a comment about – I do not agree with the automatic enrollment being that the CRS is a voluntary program. I do think that is part of the incentivizing of the communities to want to engage in flood reduction and higher standards and all of that so that they can get these discounts. And if they are automatically enrolled, I feel like that puts more pressure on communities to be more active in the program, and once elected officials know they are in the program, then it's going to put more stress on those employees that are already wearing several hats.

For the people who are saying that the manual is kind of overcomplicated and burdensome, I don't disagree with you there. But I would encourage you to get with other participating communities and to form a Users Group. I run a CRS Users Group here in Houston, Texas. We work closely with our ISO specialist and she has been wonderful about bringing training to us and interpreting the Manual for our benefits. That is all I have to say. Thank you.

- **Hunter Gray:** Thank you for your comments. It looks like we have gotten through that list. Let me check again. Dustin Willett if you are on, would you like to provide comments still? ... it doesn't appear that Dustin is still on.

If there were others who were on and were given a chance to speak but had technical difficulties and didn't end up speaking, please raise your hands, and we are happy to come back to you now. ...okay it appears that we have gotten through that list.

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Since we have gone through all the registered speakers, those who have raised their hands, this is an open call for any other individuals who may want to provide verbal comments for the record. If you would like to do so, please raise your hand. You can find that button at the bottom of your window and we will call on you.

- Up next, we have Caren Morell. Caren, would you like to come on and provide verbal comments?

Verbal Commenter #21

- **Caren Morell:** Yes. Can you hear me?
- **Hunter Gray:** Yes, we can.
- **Caren Morell:** Hi, thank you. Thank you for having me today. This is Karen Morrell. I am an insurance agent who is basically had her career in the Florida Keys since 1998 and I follow this flood topic very diligently.

I just want to reach out and say that some of the problems I am seeing in my communities who are diligent in applying for these discounts, the policyholders under Risk Rating 2.0 are not reaping those benefits. I have customers paying full-risk rates, some policies, to the tune of \$5,000-\$6,000. Their CRS discount is \$11. I have reached out to companies and different sources to try to get a, pin down why we are seeing these little bits of discounts, and I'm not getting any real straight answers. I am told by underwriters there is a minimum rate, and if that minimum rate with the discounts is higher than – they don't get the discount. I think that is something fundamentally flawed under Risk Rating 2.0 in the CRS discounts. I just want to make that comment.

- **Hunter Gray:** Thank you for your comments. Up next, we have Samantha Estabrook. Samantha, are you on? Would you like to provide comments.

Verbal Commenter #22

- **Samantha Estabrook:** Yes. Are you able to hear me?
- **Hunter Gray:** Yes, we are.
- **Samantha Estabrook:** Perfect, my name is Samantha Estabrook of Oak Works LLC. I submitted a public comment, and I just wanted to highlight it as a previous CRS coordinator for a Class 6 community and as someone who helped contribute to the 2024 state-based credit sheets, which is something that a CRS specialist or your ISO representative uses to do an initial check to see if there are any state-adopted regulations that will help communities. That is just a little bit of my background.

And I wanted to just highlight that I had submitted a report that covers the seven summarized topic areas and kind of delves into some of the misconceptions that are found in some of the summarized topic areas and really elevates the overall purpose of the Community Rating System program for creating community incentives as well as response to each of the 11 posed questions.

In addition to that, there is a response if interested for the GAO report, 2023-105977, which helped facilitate this meeting. In addition to responding to all of the recommendations offered there, it does provide responses for the executive action recommendations in 1 and 2. I definitely thank FEMA for putting this opportunity together to allow folks to provide feedback in terms of opportunities to simplify the program, but

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also just opportunities to think about how benefits continue to be shared and can be elevated for individual community members. Thank you

- **Hunter Gray:** Thank you for your comments. Up next, we have Eric Silva-Quintero. Eric are you on, and would you like to provide comments?

Verbal Commenter #23

- **Eric Silva-Quintero:** Yes. Hello, can you hear me?
- **Hunter Gray:** Yes, we can.
- **Eric Silva-Quintero :** Hi. This is Eric Silva-Quintero from Osceola County, FL. I am the CRS coordinator here. My comment is just to say I think whenever applying any of these changes to the CRS program, we really need to think about what the program is for, what it is here for. It's to incentivize communities to go above and beyond from what the NFIP requirements are, to help mitigate flood damage and risk to community members. And when applying changes like opting communities automatically into the CRS program, we need to think about what is actually accomplishing. Is it just to have a number on a spreadsheet or presentation and say, look, we have more communities in the CRS program than we did the year prior? Or is it actually accomplishing the CRS' original intention, which is to mitigate flood risk? Is it accomplishing that?

And whenever applying any other changes, we need to think about that, how it is affecting the community that are already in the program. Is it making it easier for them to stay in the current rating? Is it making it unnecessarily more difficult for them to stay in the rating they are currently in? And what are the benefits we are actually offering the communities?

If the community, like I've heard from many other members from around the country, are not receiving the incentives that they were promised, it becomes something very difficult to sell to our communities is something we should be doing or is good for us. If their community members are not seeing the incentives and not seeing return on investment, then the CRS program's goal is not being met. That can make it very difficult for us to do our job and to keep faith in the community and what we are accomplishing. Thank you very much. That is my comment.

- **Hunter Gray:** Thank you for your comments. It looks like we have gone through the list of folks who had raised their hand. This is a final call for any additional verbal comments from participants. If you would like to provide verbal comments and have not gotten the chance to do so, raise your hand, and we will call on you. ...

Okay. I think at this point, there are no additional verbal comments that we are seeing from participants. Shilpa, I am happy to turn it back to you for closing remarks.

Slide 17 Thanks [& Conclusion]

- **Shilpa Mulik:** Thank you, Hunter. I want to thank all of you again for joining today's public meeting and for those who provided their verbal comments. We need input from the whole community as we review the CRS program and position it for the future

If you already have not done so, please remember to submit written comments. We have the federal eRulemaking portal at [regulations.gov](https://www.regulations.gov) using docket FEMA-2024-0022 up until September 9, 2024.

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The transcript of this public meeting will be available on FEMA.gov and in the Federal Register at a later date. In the meantime, please send any questions to FEMA-CRS-Redesign@fema.dhs.gov. Thank you again, this concludes today's public meeting for FEMA CRS Redesign.

Written Inputs Submitted During Meeting

The following written comments and questions were submitted electronically by members of the public to the hosts during the meeting via the Q&A function of the Zoom Webinar virtual meeting platform.

1. **Liz Treston:** He said Incentivize, yes?
 - o Host response: Yes that is correct
2. **Tom Brockenbrough:** can you post a link to the GAO report in the chat, please?
 - a. Host response: I just posted the link in the chat. <https://www.gao.gov/products/gao-23-105977>
3. **Elizabeth Leibold:** My most important comment for me is to ask that: the additional fees that Congress have added to insurance policies be available to be discounted by the CRS program discounts. These new fees are not included for the discount which is perceived as being not consistent, not fair, and discouraging to the participating communities. Each participating NFIP community should be able to apply their discount (that the community works hard to obtain) to ALL of the policies and any associated flood insurance fees. Otherwise having additional fees, that are not discounted, discourages the community to participate.
 - a. Host response: Thank you for your feedback. This is a public meeting to capture comments. We will submit your comment as part of the public record. You can also submit written comments, identified by Docket ID: FEMA-2024-0022, through the Federal eRulemaking Portal at www.regulations.gov no later than September 9, 2024. All submissions must include the agency name and Docket ID for this notice. If you are answering one of the questions provided, we ask that you please include the corresponding question number in your submission.
4. **Savannah Newbern:** Will these slides be shared after the meeting?
 - a. Host response: Yes, a PDF version of the presentation slides, the transcript, and the video recording will be posted after the meeting.
5. **Greg Ellison:** Please give a concrete example of Goal # 2: Embedded equity as a foundation of the CRS Program. Thank you.
 - a. Host response: An example of embedding equity as a foundation in the CRS program could be reducing barriers to joining the CRS program, such as the suggested program alternative for auto-enrolling all NFIP-participating communities into the CRS program. The RFI seeks feedback on several equities themes.
6. **Ashlynn Shanahan:** Is there more detailed information about the changes FEMA anticipates making available at this time?
 - a. Host response: Thank you for your question. For more about this Request for Information and to read the background documents, please visit www.regulations.gov and search for Docket ID: FEMA-2024-0022.
7. **Randy Neprash:** Correct pronunciation of my name - Randy Neprash - use the words "knee" and "rash" with the "p" at the beginning of the second syllable. I was told that I am the 29th listed speaker.
 - a. Host response: Noted - thank you for the guidance.
8. **Terry Sheffield:** Why did it convert to Spanish
 - a. Host response: Please click on the "Globe" or Interpretation and select Original Audio
9. **Lisa Sharrard:** CRS give a great deal of credit for activities that communities have no intention of implementing. I'd like to see an implementation requirement or milestones that show effort.
 - a. Host response: Thank you for your feedback. This is a public meeting to capture comments. We will submit your comment as part of the public record. You can also submit written comments, identified by Docket ID: FEMA-2024-0022, through the Federal eRulemaking Portal at www.regulations.gov no

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10. Terry Sheffield: did its on English

a. Host response: Are you able to hear everything correctly now?

11. Elizabeth Leibold: who is currently speaking?

a. Host response: n/a

12. Dennis Dixon: I had initially signed up to speak, not knowing what the format would be or the materials provided. I have no comments to give today. cheers, Dennis Dixon

a. Host response: Thank you for letting us know.

13. Elizabeth Leibold: I did not understand Tom's proposal - please send me Tom's email thx

a. Host response: Hi Elizabeth, we are unfortunately not able to share the contact information of other participants.

14. Elizabeth Leibold: Who is currently speaking - can you post name on chat or somewhere?

a. Host response: Lisa Sharrard was the previous speaker

15. Bob Dorta: Would you please post the link to make a written comment again? The 'slide' was too quick for me.

a. Host response: Hello, here is the link and the docket id to post your public comments:
www.regulations.gov and search for Docket ID: FEMA-2024-0022.

16. Lisa Tennyson: Can someone provide clarification that CRS discounts do not apply until premiums meets full risk rating. If this is correct, and we are a essentially decade away from reach full risk rating, does that mean CRS discounts are not applicable for a decade? Concerned that my community has implemented considerable mitigation and achieved a class 3, at the cost of considerable public tax dollars and commitment. Are we now to wait years to realized the CRS discount if most of our insureds are only half way to full risk?

a. Host response: Hi Lisa, can you please send your comment to the following email address to be addressed at a later time: FEMA-CRS-Redesign@fema.dhs.gov. Thank you.

17. Bob Dorta: Never mind, i think i found it. Thank you.

a. Host response: n/a

18. Vince Seijas: Vince Seijas, City of Doral Building Official. The CRS Program point System needs to be regionalized In areas without dams or levies, other activities must have more points awarded. Risk Rating 2.0 is critically flawed, Premiums are based on replacement cost, yet payouts are not replacement value. This is NOT equitable. How can two identical properties/building with different values pay different premiums yet cap at \$250,000.00. Mitigation for other forms of disaster (Hurricane/wind) still count against SI/SD, you essentially punish mitigation efforts in communities that track SI/SD. The CRS Discounts are dwindling and thus the elected body is less willing to fund a CRS Coordinator or staff.

a. Host response: Thank you for your feedback. This is a public meeting to capture comments. We will submit your comment as part of the public record. You can also submit written comments, identified by Docket ID: FEMA-2024-0022, through the Federal eRulemaking Portal at www.regulations.gov no later than September 9, 2024. All submissions must include the agency name and Docket ID for this notice. If you are answering one of the questions provided, we ask that you please include the corresponding question number in your submission.

19. Vince Seijas: Vince Seijas Continued, If a discount is not provided directly to person paying the policy you will eliminate the incentive of the elected to invest in staff and higher standards.

a. Host response: Thank you for your feedback. This is a public meeting to capture comments. We will submit your comment as part of the public record. You can also submit written comments, identified by Docket ID: FEMA-2024-0022, through the Federal eRulemaking Portal at www.regulations.gov no later than September 9, 2024. All submissions must include the agency name and Docket ID for this notice. If you are answering one of the questions provided, we ask that you please include the corresponding question number in your submission.

20. Vince Seijas: Marcia Steelman of Miami-Dade County hit some of the same points

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- a. Host response: Thank you for letting us know.
- 21. Christina Rimes:** No comment at this time.
- a. Host response: Thank you for letting us know.
- 22. Donna Bailey:** Will the CRS program fall in line with the new requirements of the FFRMS?
 - a. Host response: Hi Donna, can you please send your question to FEMA-CRS-Redesign@fema.dhs.gov email address so we can address it at a later time? Thank you.
- 23. Liz Treston:** Brava! Exactly!
 - a. Host response: n/a
- 24. Elizabeth Leibold:** I concur with Vince - regionalize CRS activities. RR 2.0 is still a black box - open the box and allow Floodplain Mangers to understand black box otherwise how do we manage flood if we can not explain risk?
 - a. Host response: Thank you for your feedback. This is a public meeting to capture comments. We will submit your comment as part of the public record. You can also submit written comments, identified by Docket ID: FEMA-2024-0022, through the Federal eRulemaking Portal at www.regulations.gov no later than September 9, 2024. All submissions must include the agency name and Docket ID for this notice. If you are answering one of the questions provided, we ask that you please include the corresponding question number in your submission.
- 25. Elizabeth Leibold:** Donna - excellent question. How is FFRMS impacting CRS?
 - a. Host response: Hi Donna, thank you for your question. Please send your question to our email address: FEMA-CRS-Redesign@fema.dhs.gov., where it can be addressed at a later time.
- 26. Vince Seijas:** ASCE 24 is revised and open for public input September 26, 2024. It does incorporate some of the FFRMS modifications. expect an ASCE 24-25
 - a. Host response: n/a
- 27. Kyle Riefler:** I have no comments. Thanks, Kyle Riefler.
 - a. Host response: Thank you for letting us know, Kyle.
- 28. Elizabeth Leibold:** I agree with Lauren regarding accusation of perception of getting double pts. If the community makes efforts to put in paperwork per manual, they should get credits.
 - a. Host response: Thank you for your feedback. This is a public meeting to capture comments. We will submit your comment as part of the public record. You can also submit written comments, identified by Docket ID: FEMA-2024-0022, through the Federal eRulemaking Portal at www.regulations.gov no later than September 9, 2024. All submissions must include the agency name and Docket ID for this notice. If you are answering one of the questions provided, we ask that you please include the corresponding question number in your submission..