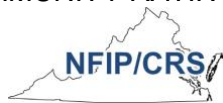


COASTAL VIRGINIA COMMUNITY RATING SYSTEM WORKGROUP



WORKING TOGETHER FOR A STRONGER VIRGINIA

Mr. Richard Sobota
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615 Chestnut Street
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Philadelphia, PA 19106-4404

Dear Rich,

Thank you for the opportunity to request additional information regarding the minus-rated lists provided to local governments. The Coastal Virginia CRS Workgroup met on May 27, 2020 to discuss how local floodplain managers should interpret the list of minus-rated policies provided by FEMA. Although we reviewed the PowerPoint slides you provided prior to the meeting, many members felt their questions were not answered. We appreciate your time and attention to address the questions and concerns of this regional community of professionals.

The [Coastal Virginia CRS Workgroup](#) promotes education and cultivation of strong floodplain management programs in the Commonwealth of Virginia. Established in 2010, the Coastal VA CRS Workgroup includes locality representatives from a wide range of coastal communities in VA, although we invite members from outside VA's coastal zone through the accommodation of remote access to meetings. In addition to locality floodplain managers, emergency managers, engineers, and planners, our membership includes the academic community, nonprofit sector, business community, and regional and state government. We meet every other month to provide a forum about the NFIP, the CRS Program, FEMA's Hazard Mitigation Grant programs, hazard mitigation planning, climate adaptation, flood resilience, and more.

Given the [media attention](#) related to FEMA's minus-rated lists, local government staff responsible for administrating the NFIP in their communities want assurance they understand the purpose, intent, and expectations associated with a list of structures with minus-rated policies. Two cities that are members of the Coastal VA CRS Workgroup conducted a preliminary analysis of the properties on their most recent minus-rated list and found a significant number of properties were included, but based on their data and records, are clearly not constructed in a manner to warrant a minus rating. Members doubt the accuracy of FEMA's list, which calls the accuracy of their constituents' policies into question and makes it difficult to generally trust the data and how it should be used in the community. As Floodplain Administrators, these Workgroup members want the customers in their localities rated properly and would prefer FEMA records related to their localities be as accurate as possible.

In light of these issues identified, please provide responses to the following questions raised during our CRS Workgroup discussion:

1. Can you explain why the floodplain administrator needs to know about the minus-rated list? Specifically, what are the required actions by the floodplain administrator and/or community? If there is no required action based on the list, is there a recommended action by the floodplain administrator and/or community?
2. Our discussion highlighted a disagreement amongst insurance agents that minus-rated properties cannot receive CRS discounts. Can you confirm that all minus-rated properties are ineligible for CRS discounts? If not all, are any minus-rated properties ineligible for CRS discounts? Is there a check on insurance policies to enforce this exclusion?
 - a. If minus-rated properties are all eligible for CRS discounts, the CRS Coordinator's Manual should be updated to reflect this.
3. In the minus-rated list, what does the column "elevation difference" mean? Does it mean that someone has a finished floor below BFE? One City reported records for at least 300 properties with elevation certificates indicating they should be rated well above BFE (based on FFE, flood openings, mechanical/equipment elevations).
4. Is it possible to include in the minus-rated list and accompanying documentation the following information?
 - a. Which properties on the list are receiving the CRS discount
 - b. An explanation of what the rating methods mean for the properties
5. The messaging around the minus-rated list is confusing and potentially inaccurate. Referring to the minus-rated list as a list of potential violations or a list where property owners are paying more than they should be seems to suggest the local government is failing to enforce the NFIP appropriately, when in fact the list does not reflect such disparity. Is it possible to modify this messaging to help clarify the intention of the minus-rated list and the impact it has on local government enforcement of the NFIP?

Thank you for your time and attention to these questions and this important issue that is confusing to our local governments who rely on FEMA's guidance to effectively administer the National Flood Insurance Program. The next meeting of the Coastal VA CRS Workgroup is July 29, 2020. A response to the above questions would be most appreciated prior to the Workgroup meeting.

Sincerely,



Mary-Carson Stiff
Chair, Coastal VA CRS Workgroup
Director of Policy, Wetlands Watch

CC:

Zane Hadzick, FEMA
Kristen Jones, FEMA
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