

December 28, 2010

Federal Emergency Management Agency
Office of Chief Counsel
500 C Street SW
Room 840
Washington, DC 20472

Docket ID: FEMA-2010-0065

Re: National Flood Insurance Program Public Policy Options

The American Public Works Association (APWA) appreciates the opportunity to submit these comments in response to the National Flood Insurance Program (NFIP) public policy options presented during Phase III of FEMA's NFIP Listening Session. These comments were developed with input from APWA's Emergency Management Committee.

APWA supports an approach to floodplain management and flood insurance which is risk-based and allocates the cost of insurance as equitably as possible to floodplain occupants, including those with residual risk behind levees, and those that implement effective and environmentally sound risk reduction measures. Moreover, APWA supports approaches to reduce incentives, particularly those resulting from federal funding programs for floodplain development or occupancy, while preserving the availability of insurance, hazard mitigation funding and disaster relief for municipal public works facilities. Importantly, municipal public works facilities are an integral part of floodplain management strategies and are functionally dependent upon their location in floodplains.

The first three options identified—Privatization, Community Based Insurance and Federal Assistance—contain challenges that may be insurmountable, either from an economic perspective or in terms of gaining consensus among all the parties affected. Without further development of the options, including analysis of total costs and how costs would be distributed among federal, local government, private and individual stakeholders, APWA could not support any of those approaches.

APWA believes that the current NFIP framework generally supports these objectives and that with some of the changes or enhancements identified in Policy Option IV, "Optimization of the

Current NFIP”, APWA objectives can be achieved. In particular, APWA supports enhancements or improvements to the current program which would:

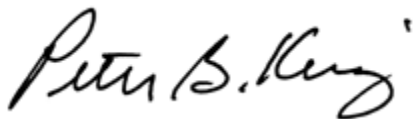
- Reduce and potentially eliminate subsidies over time, migrating to a program based upon actuarial rates.
- Address repetitive loss properties through incentives for flood proofing or relocation from the floodplain.
- Ensure affordability for low income communities/individuals.
- Improve coverage to broaden the base of floodplain occupants paying premiums.
- Develop new approaches to addressing infrastructure in the floodplain, including new ways to determine the capacity of and to certify levees.
- Integrate floodplain management planning into multi-hazard planning programs.
- Expand and enhance the use of the Community Rating System to provide greater incentives for communities to manage their floodplains.

APWA is an organization dedicated to providing public works infrastructure and services to millions of people in rural and urban communities, both large and small. Working in the public interest, our more than 29,000 members plan, design, build, operate, manage, administer and maintain the transportation, water supply, sewage and refuse disposal systems, public buildings, and other structures and facilities essential to our nation’s economy and way of life.

If you have questions or need additional information, please feel free to contact me at (202) 408-9541 or pking@apwa.net.

Thank you for your time and attention to this matter.

Sincerely,



Peter B. King
Executive Director

cc: APWA Emergency Management Committee
APWA Government Affairs Committee