What is a Repetitive Loss Area Analysis and Why You Should Want One

SCHAM Conference 2024

Agenda

Definition of Repetitive Loss
- Severe Repetitive Loss

Accessing Repetitive Loss Data
- 1974 Privacy Act

Understanding the Repetitive Loss List
- Updating the Repetitive Loss List

Benefits of a Repetitive Loss Area Analysis

Mapping Repetitive Loss Areas

5-Step Planning Process
- Outreach
- Collecting Data on buildings
- Agency Coordination
- Mitigation Options
- Final Document

Repetitive Loss Definitions

Definition

Repetitive Loss/Severe Repetitive Loss Definition

Terminology

Repetitive loss Any insurable building for which two or more claims of more than $1,000 were paid by the NFIP within any rolling 10-year period, since 1978. Two of the claims paid must be more than 10 days apart but, within 10 years of each other. A repetitive loss property may or may not be currently insured by the NFIP.

Severe repetitive loss As defined by the Flood Insurance Reform Act of 2004, SRLs are 1–4 family residences that have had four or more claims of more than $5,000 or at least two claims that cumulatively exceed the building's value. The Act creates new funding mechanisms to help mitigate flood damage for these properties.

NATIONAL FLOOD INSURANCE PROGRAM

South Carolina Model Ordinance

A building covered by a contract for flood insurance that has incurred flood-related damages on at least 2 occasions during a ten-year period ending on the date of the event for which a second claim is made, in which the cost of repairing the flood damage, on the average, equaled or exceeded 25% of the market value of the building at the time of each such flood event.

Accessing Repetitive Loss Data

RL Data

Accessing Repetitive Loss Data

fema-r4-nfip-data-request@fema.dhs.gov

Privacy Act of 1974

PII – Personally Identifiable Information


FEMA

Privacy Data Cover Sheet

To be used on all documents containing Personal information

DOCUMENT(S) ENCLOSED MAY BE SUBJECT TO THE PRIVACY ACT OF 1974

Contents shall not be disclosed, discussed, or shared with individuals unless they have a direct need-to-know in the performance of their official duties. Deliver this/these document(s) directly to the intended recipient. DO NOT drop off with a third-party.

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Privacy Data Cover Sheet

FEMA Form 9109.1, JUL 2007

RL Data

Accessing Repetitive Loss Data

NFIP REQUEST LETTER TEMPLATE:

Use Official State/Local/Tribe/Territory/Entity Letterhead

{Date}

Re: Privacy Act Request for FEMA Files/Information

Dear DHS/FEMA/Federal Insurance and Mitigation Directorate

I am writing to request that the Federal Emergency Management Agency (FEMA) provide me with National Flood Insurance Program (NFIP) policyholder and claims data related to *{insert the community, USA}*.

My office is requesting the data to offer mitigation advice to those policyholders who may be able to take simple action to improve their insurance rating. Specifically, we plan to use the data to review and assist in floodplain management, hazard mitigation application development and to promote the purchase of flood insurance in neighborhoods that are underinsured. We will also use the NFIP data for assessment and review of repetitive loss and severe repetitive loss properties. Finally, we need NFIP information from FEMA to assist with the Community Rating System [CRS] activities.

Specifically, we plan to use NFIP data to assist with community floodplain management, CRS and hazard mitigation activity, assisting to make SD determinations and buyouts for community and service areas.

I am requesting that the above information be provided pursuant to the "routine use" provision of the Privacy Act of 1974, 5 U.S.C. 522a. I am requesting disclosure of this information under Routine Use N, O, R and T of the NFIP SORN. The supporting SORNs for this data request are: DHS/FEMA 003 –NFIP Files System of Records, 79 FR 28747 (May 19, 2014).

My office will not disclose this information to other entities unless they are identified on the form or use the information for any purpose other than that stated above. Any other entities that require identical data files for the purposes outlined in this letter will contact FEMA separately with their

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Name
Title

The following information is provided to facilitate this request:

Requestor Name:	Click or tap here to enter text.
Name of SLTT or External Entity:	State/Local/Tribe/Territory (SLTT)
Purpose for Data: Please check the appropriate boxes and elaborate below.	☒ Community Rating System ☒ Hazard Mitigation Plan ☒ Floodplain Management ☒ Grants ☒ Substantial Damage Assessments Fully describe your purpose for using the data: Data request purpose: NFIP data will be used for floodplain management, CRS and hazard mitigation activity, assisting to make SD determinations and buyouts for community and service areas
Type of Data: Please check the appropriate boxes and elaborate below.	☒ Repetitive Loss ☒ Active Policies ☒ Claims ☐ Policyholder Names* ☐ Compiled Disaster data (includes IA data) ☐ Increase Cost of Compliance (ICC) claims

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Updating Repetitive Loss Data

Updating Repetitive Loss Data

DEPARTMENT OF HOMELAND SECURITY
Federal Emergency Management Agency

OMB Control Number: 1660-0022
Expiration: 10/31/2023

NFIP REPETITIVE LOSS UPDATE FORM

Public reporting burden for this form is estimated to average .5 hours for annual recertification, per response. The burden estimate includes the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and submitting the form. This collection of information is required to obtain voluntary benefits. You are not required to respond to this collection of information unless it displays a valid OMB control number. Send comments regarding the accuracy of the burden estimate and any suggestions for reducing the burden to: Information Collections Management, Department of Homeland Security, Federal Emergency Management Agency, 500 C Street, S.W., Washington, D.C. 20472, Paperwork Reduction Project (1660-0022). NOTE: Do not send your completed form to this address.

Privacy Notice

This Privacy Notice serves to inform you of why DHS is requesting the information on this form.

AUTHORITY: FEMA is authorized to collect the information requested on this form pursuant to The National Flood Insurance Reform Act (NFIRA) of 1994 (P.L. 103-325, Sec. 541).

PURPOSE: FEMA is requesting this information to assist in the administration of the Community Rating System (CRS). FEMA will use this information to determine eligibility of a community to participate in the CRS, to facilitate communication between FEMA and communities for floodplain management, and to assist in reducing the flood insurance rates for policyholders within a CRS eligible community. Additionally, FEMA uses the information to maintain a listing of communities participating in the National Flood Insurance Program.

ROUTINE USES: The information requested on this form may be shared externally with floodplain management partners and contractors to assist the Department of Homeland Security in administering the CRS or other floodplain management activities.

CONSEQUENCES OF FAILURE TO PROVIDE INFORMATION: Providing this information to FEMA is voluntary. However, failure to provide this information may result in FEMA's determination that a community is not eligible to participate in the CRS and in turn reducing potential NFIP flood insurance premium savings. Individuals and communities who do not provide this information may contact Bill Lesser, FIMA CRS Coordinator at FEMA at FEMA-CRS@fema.dhs.gov for further assistance.

THE INFORMATION ON THIS FORM IS BASED ON CLAIMS ON OR BEFORE:

REPETITIVE LOSS NUMBER:

Internal use only ☐ A ☐ N/A ☐ FRR

NFIP Community Name:	CID#:
Local Property Identifier:	
Current Property Address	Previous Property Address/Community ID#
Last Claimant:	Last Claimant:
Insured:	Name Insured:
Date of Losses:	Total Number of Losses for Property:

(continued on next page)

REQUESTED UPDATES

MARK ALL UPDATES BELOW THAT APPLY (IMPORTANT - SEE INSTRUCTIONS)

1. ☐ **INFORMATION PROVIDED NOT SUFFICIENT TO IDENTIFY PROPERTY.**
   Choose this update if all attempts to locate the property fail. Please describe the steps you took to locate the property in the comments section below.
2. ☐ **COSMETIC CHANGES REQUIRED TO THE ADDRESS:**
   Update the address shown above and/or add our local alternative property identifier such as a Tax Assessor #.
3. ☐ **PROPERTY NOT IN OUR COMMUNITY OR JURISDICTION:**
   Choose this update if you have positively determined that the property shown is not located in your community. Please provide the correct NFIP community name and if known the NFIP community ID Number. If available, please attach a map showing the property location.
   ASSIGN TO NFIP COMMUNITY NAME: ____________ NFIP COMMUNITY ID#: ____________
4. ☐ **FLOOD PROTECTION PROVIDED.**
   Choose this update only if some type of structural intervention has occurred to the building, prop-erty or the source of flooding that protects the building from future events similar to those that occurred in the past. The update must be supported by documentation such as an Elevation Certifi-cate and the Mitigation action and funding below must be provided.
   (Mitigation Action 1.) (Source of Primary Mitigation Funding 3.) (Secondary Source of Funding 3.)
5. ☐ **NO BUILDING ON PROPERTY.**
   Choose this update only if the property in question can be positively identified as the site of the previously flooded building and documentation is available to support that an insurable building no longer exists at this site. The update must be supported by documentation such as a Demolition or Relocation Permit and the Mitigation action and funding information below must be provided.
   (Mitigation Action 2.) (Source of Primary Mitigation Funding 3.) (Secondary Source of Funding 3.)
6. ☐ **DUPLICATE LISTING WITH RL NUMBER:** ____________ COMBINE AS ONE LISTING.
   Choose this update to identify two or more separate listings that are for the same building. List all other RL numbers that are duplicates to this property. Please indicate which address shown is the correct address to use.
7. ☐ **HISTORIC BUILDING:**
   Choose this update if you know the building is or would be eligible to be listed on a State or National Historic Registry.

COMMENTS SECTION:

A signed RL transmittal sheet must accompany this form for approval of the update!

Reasons for Updating

- Cannot locate property
- Assigned wrong CID number
- Mitigated
- Correcting address
- Duplicate
- Historic

Benefits of a Repetitive Loss Area Analysis

RLAA

Benefits of a Repetitive Loss Area Analysis

- More detailed approach than a community-wide HMP or FMP
- Neighborhood approach to mitigation planning
- Building by building analysis
- Specific flood protection measures
- Future substantial damage claims
- Understanding site-specific flood problems
- X-Zone problems
- Nuisance or major flood problems

Up to 140 points of credit under Activity 510 in CRS

Mapping Repetitive Loss Areas

RLAA

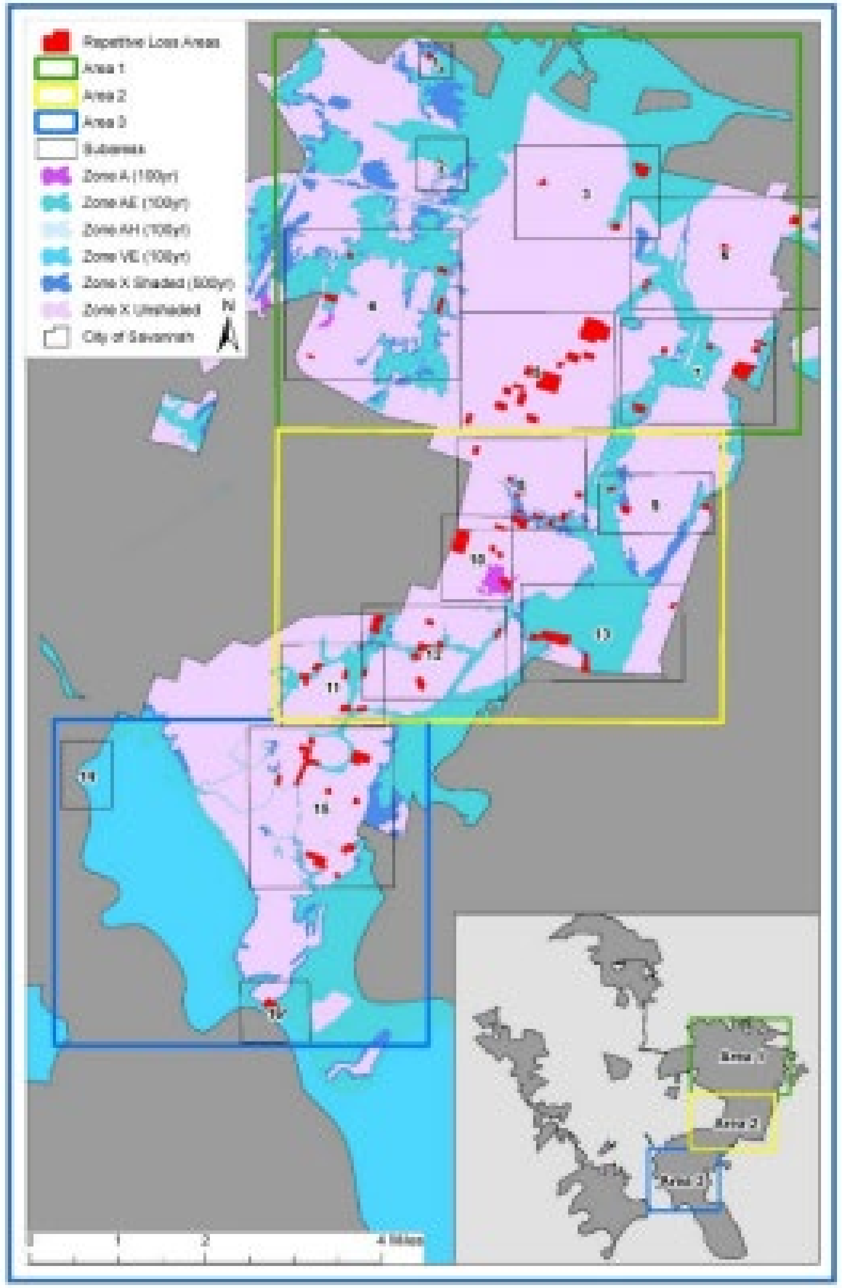
Mapping Repetitive Loss Areas

- Locate unmitigated RL properties
- Identify “historical” properties – policy data
- If available, use a topographic map or GIS to identify areas or properties that have a lower elevation
- Draw lines around similarly situated properties
- Check in field to see if areas makes sense (slab on grad foundation next to crawlspace)
- Property boundary lines and building footprints don’t violate the privacy act of 1974
- Some RL properties can be in X-Zone

RLAA

Mapping Repetitive Loss Areas

- Flooding types (coastal, riverine, x-zone)
- Foundation type (crawl space, slab on grade, elevated, etc.)



RLAA

Mapping Repetitive Loss Areas

SUMMARY INFO	AREA 3
# of Repetitive Loss Properties	1
# of Historic Claim Properties	2
# of Additional Properties	17
Primary Streets	SW 182nd Terrace, SW 183rd Terrace
% of Area in SFHA	100%
Other Notes:	

5-Step Planning Process

Step 1 Contact Property Owners

- Communities must notify all properties in all repetitive loss areas that the project is beginning, investigation of flood problems and recommend mitigation solutions
- The notice should indicate how the property owner can get a copy of the final plan and who to contact
- Work will occur in the right-of-way unless invited onto property
- Direct mail is the most effective way to notify property owners
- A notice in a newspaper does not qualify as notice

wsp

Planning Process

Step 1 Contact Property Owners

Glynn County Georgia

[DATE]

[NAME]
[ADDRESS]
[CITY], GA

Property Address: XXX
Parcel Number: 1234567890

To the Owner or Resident of this Property:

You are receiving this letter because your property is in an area that has been flooded several times. As part of Glynn County's participation in the National Flood Insurance Program's (NFIP) Community Rating System (CRS), the Community Development Department is conducting a Repetitive Loss Area Analysis to evaluate properties that have experienced repetitive flood damage.

The Repetitive Loss Area Analysis will involve the collection of community and property data, including:

- Tax ID and lot and parcel number
- Structure and site elevation information
- Building information, such as construction type, building age, and building value
- Land information, such as topography, watershed, and drainage features
- Historical flood event information (when events occurred, amount of damage to property, etc.)
- Building codes/floodplain development regulations exceeding minimum standards

Within the next 30 days, Glynn County's contractor, WSP, will visit your property to survey the flood risk and to take photographs. You do not need to take any action, but we encourage you to provide any relevant flooding information when the survey crew is in your neighborhood. The survey crew will be looking at the type and condition of your foundation, drainage patterns on the lot, and whether outside mechanical equipment is elevated. All on-site data collection will occur from the right-of-way.

You can help us perform this analysis by completing the enclosed questionnaire. Return a hard copy to Community Development Administration, 1725 Reynolds Street, Suite 200, Brunswick, GA 31520, or complete it online using the QR code below. We also encourage you to review the recommendations on the following page for ways to protect yourself and your property from flooding.

The results of the Repetitive Loss Area Analysis will include a review of alternative approaches for mitigation, including property protection measures or drainage improvements, where feasible. Once the analysis is complete, a copy of the report can be obtained from the Community Development Department. If you have any questions, please call the Community Development Department at (912) 554-7428.

Sincerely,

Necie Carroll
Community Development Programs Analyst
Glynn County Community Development Department

Flood Protection Questionnaire

FLOOD PROTECTION QUESTIONNAIRE

Name: ____________________

Repetitive Loss Property Address: ____________________

1. How many years have you occupied the building at this address?
   - ☐ Less than 1
   - ☐ 1-5 years
   - ☐ 5-10 years
   - ☐ 10+ years
2. Do you rent or own this building?
   - ☐ Rent
   - ☐ Own
3. What type of foundation does the building have?
   - ☐ Slab
   - ☐ Crawl Space
   - ☐ Basement
   - ☐ Other: ____________
4. Has this building or property ever been flooded or had a water problem?
   - ☐ Yes
   - ☐ No (If "no", please skip to question 9)
5. In what year(s) did it flood? ____________________
6. Where did you get water and how deep did it get?
   - ☐ In basement: ________ deep
   - ☐ In crawl space: ________ deep
   - ☐ Over 1st floor: ________ deep
   - ☐ In yard only: ________ deep
   - ☐ Water was kept out of house by sandbagging, sewer valve, or other protective measure
7. What was the longest time that water stayed in the house/building? ____________________
8. What do you feel was the cause of your flooding? Check all that affect your building.
   - ☐ Storm sewer backup
   - ☐ Sanitary sewer backup
   - ☐ Standing water next to house/building
   - ☐ Drainage from nearby properties
   - ☐ Saturated ground / leaks in basement walls
   - ☐ Overbank flooding from: ____________
   - ☐ Other: ____________
9. What flood protection measures have you installed on the property?
   - ☐ Sump pump
   - ☐ Waterproofed the outside walls
   - ☐ Re-graded yard to keep water away
   - ☐ Moved things out of basement
   - ☐ Backup power system / generator
   - ☐ Sandbagged
   - ☐ None
   - ☐ Other: ____________

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FLOODPLAIN PROTECTION QUESTIONNAIRE, *CONTINUED*

10. Did any of the measures checked in item 9 work? If so, which ones? If not, do you know why they did not work?
11. Is your building located in a Federal Emergency Management Agency (FEMA) floodplain?
    - ☐ Yes
    - ☐ No
    - ☐ I don't know
12. Do you have FEMA Flood Insurance?
    - ☐ Yes
    - ☐ No
    - ☐ I don't know
13. Do you want information on protecting your building from flooding?
    - ☐ Yes
    - ☐ No
14. Please include any additional information and comments you may have about flooding in your area:

Use one of the following options to complete and return this questionnaire by **April 19, 2024.**

Option 1 – Respond Online	Option 2 – Email	Option 3 – Mail
https://forms.office.com/e/pNdqbSkNDZ	Scan and email this completed survey to rcarroll@glynncounty-ga.gov	Return this completed survey to Necie Carroll, Programs Analyst 1725 Reynolds St, Suite 200 Brunswick, GA 31520

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Step 2 Contact Other Agencies

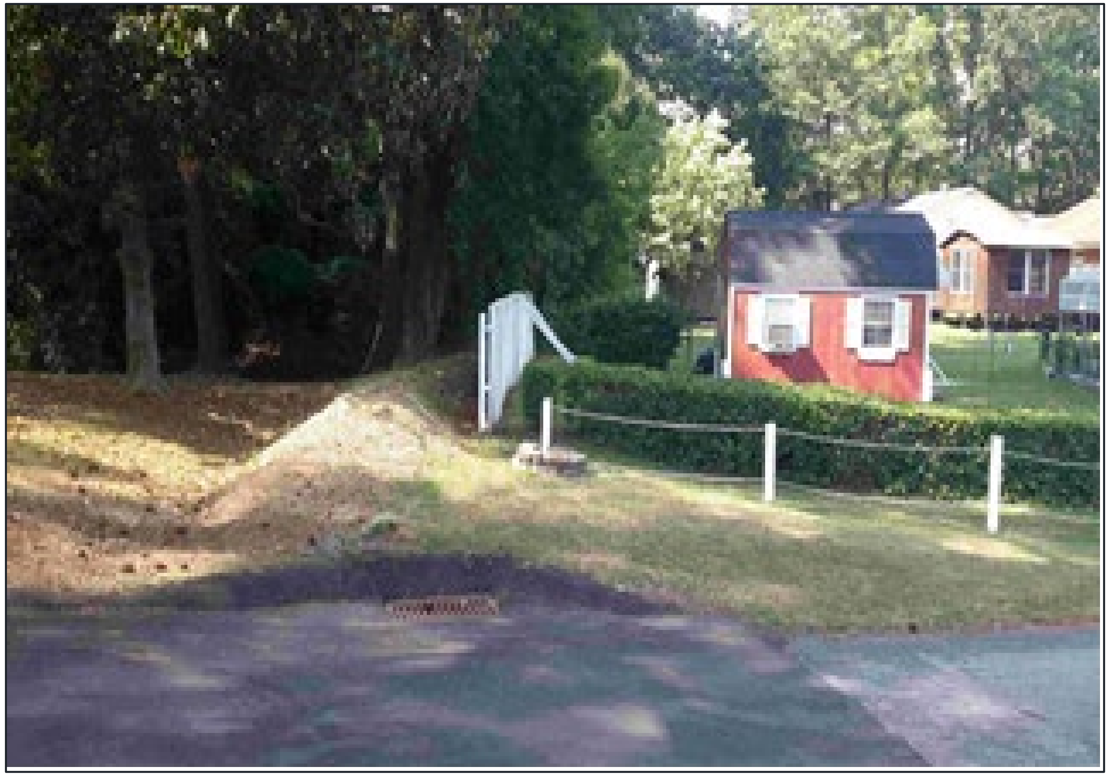
- Any relevant agencies and organizations that have plans, studies, or reports that may discuss the causes of flooding in RL areas
- Beneficial information Can be gained from flood studies, drainage studies, watershed master plans or capital improvement plans
- Internal/external agencies

Steps 2 through 5 can occur in any order

Step 3 Collect Data

Each building in all repetitive loss buildings must be visited to collect data

- Determine what caused flooding
  - Dates of flood insurance claims
- Assess potential mitigation



Repetitive Loss Area 12 – Raised berm adjacent to property

Step 3 Collect Data

Field work should be conducted in the right-of-way

- Unless property owner invites you onto the property
- Assess potential mitigation

Repetitive Loss Area 3 – HVAC unit on ground

Step 3 Collect Data

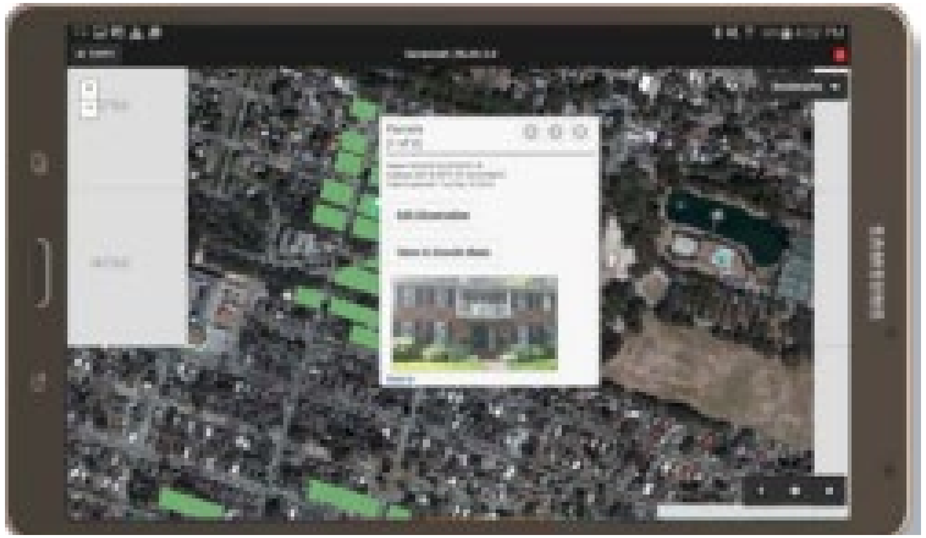
Flood factors to evaluate

- Drainage Patterns
- Location of the HVAC unit
- Condition of the building and foundation
- Gutters and downspouts
- Nearby drainage ditches and storm drains

Repetitive Loss Area 3 – Little Hominy Swamp

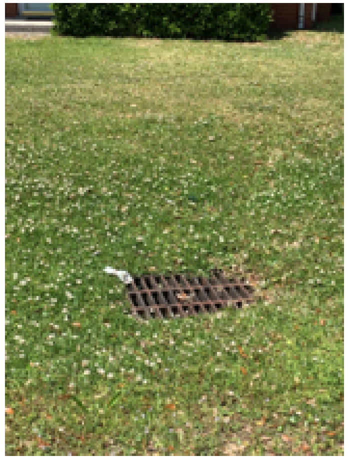
Planning Process

Step 4 Collect Data



Repetitive Loss Area: 12

Property Locator / Repetitive Loss#:	636615645061000		
Inspection Date:	4/26/2022	**Inspector:**	Abby Moore, David Stroud
Address:	108 Riverside Ave		
No. of Stories:	1	**Elevated:**	Less than 1 foot
Occupied:	Yes	**Neighborhood:**	
Date of Construction:		**Elevation from Street (Fill):**	Below grade
Spoke with:			
Observations:	Guttering in place. Back yard backs up to canal. Drainage inlet in front yard.		
Land Use:	Residential		
Land Use Notes:			
Structure Type:	Wood frame		
Structure Type Notes:			
Condition of Structure:	Fair		
Foundation Type:	Slab		
Foundation Type Notes:			
Condition of Foundation:	Fair		
HVAC:	Not elevated		
Vents:			



SCAHM Conference 2024

Planning Process

Mitigation in Field

Planning Process

Mitigation in Field

Planning Process

Mitigation in Field

Planning Process

Mitigation in Field

Planning Process

Step 4 Consider Mitigation Alternatives

- Matching the correct mitigation measure with the flooding problem
- Multiple options should be considered
- Review of specific alternatives must be conducted – Six FEMA Mitigation categories
- Property protection measures listed in 2017 CRS Coordinator's Manual – Figure 360-1

Figure 360-1 from the *CRS Coordinator's Manual*

- Demolish the building or relocate it out of harm's way.
- Elevate the building above the flood level.
- Elevate damage-prone components, such as the furnace or air conditioning unit.
- Dry flood proof the building so water cannot get into it.
- Wet flood proof portions of the building so water won't cause damage.
- Construct a berm or redirect drainage away from the building.
- Maintain nearby streams, ditches, and storm drains so debris does not obstruct them.
- Correct sewer backup problems.

Prevention, Property Protection, Structural Projects, Emergency Services, Natural and Beneficial Functions, and Outreach & Educatio

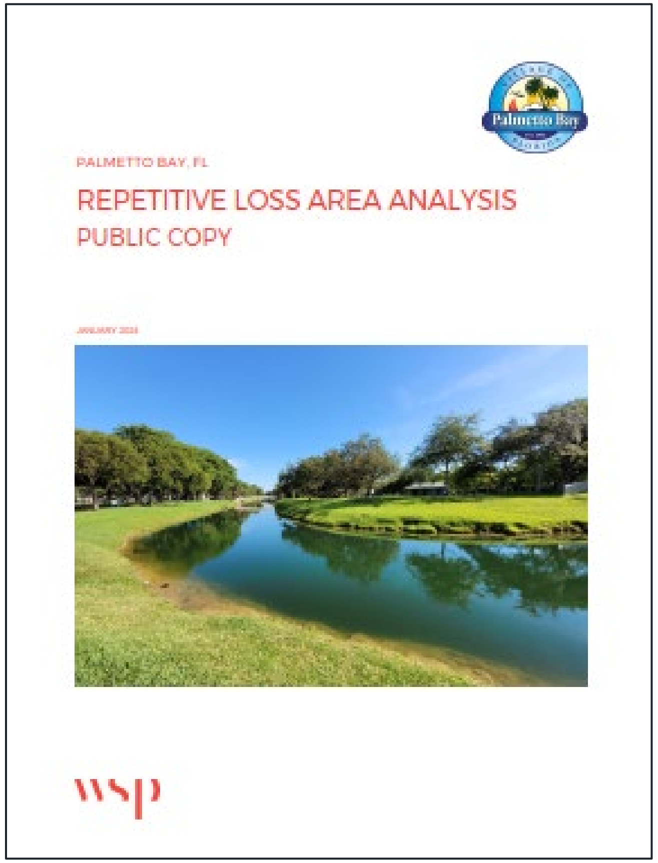
Planning Process

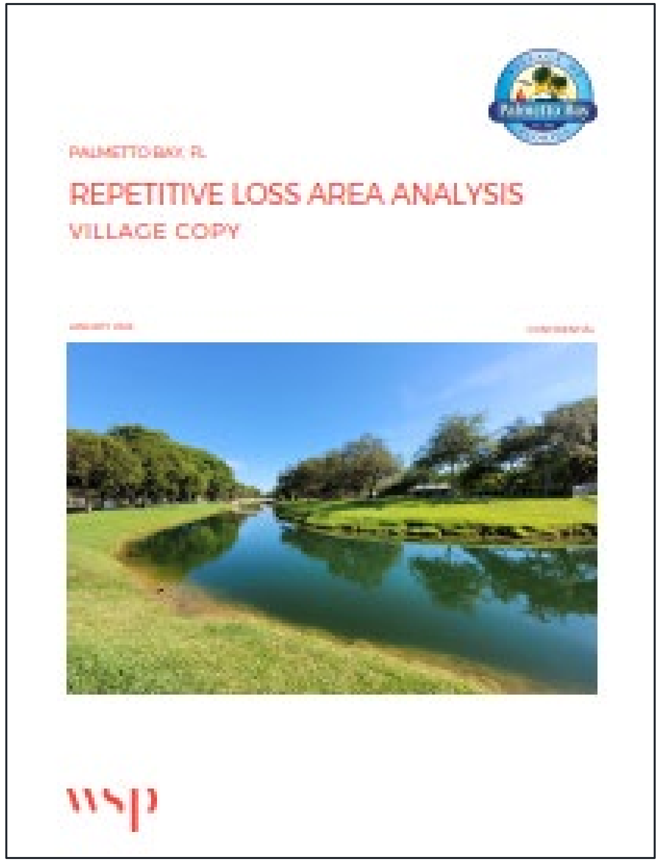
Step 4 Consider Mitigation Alternatives

MITIGATION ACTION #	PRIORITIZATION VARIABLES (WEIGHT)					
	Cost (30%)	Funding Availability (25%)	Property Owner Willingness (20%)	Staff Resources (15%)	Planning Needs (10%)	TOTAL
1: Flood insurance promotion	2	2	1	1	1	**1.55**
2: Prioritize drainage-related CIP projects	4	2	2	3	4	**2.95**
3: Encourage property owners to elevate mechanical equipment	2	3	3	2	1	**2.35**
4: Encourage low-impact development techniques	2	3	3	2	2	**2.45**

Planning Process

Step 5 Document the Findings





Public – No RL Data

Community – Includes RL Data

Thank You!

David.stroud@wsp.com