



NEW YORK STATE
FLOODPLAIN AND STORMWATER MANAGERS ASSOCIATION

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Date: September 3, 2008

To: Arthur Chenault, Building Inspectors Association of Nassau County
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From: Janet Thigpen, CFM
Chair, NYS Floodplain and Stormwater Managers Association

RE: Support of RB93 – Including One foot of Freeboard in the International Residential Code

The New York State Floodplain and Stormwater Managers Association (NYSFSMA) is a statewide professional association dedicated to reducing loss of life and property damage resulting from floods. As the Chair of NYSFSMA, I am writing to encourage you to support RB93 in mid-September at the Final Action Hearing in Minneapolis. That proposal would modify the International Residential Code to include one foot of freeboard for new construction in the floodplain.

Minimum federal standards currently require that the first floor of new floodplain structures be elevated to the height of the 100-year flood (base flood elevation). However, many factors (such as floodplain development, increased stormwater runoff, modeling inaccuracies, debris accumulation, ice jams, etc.) contribute to flood heights that exceed the base flood elevation and damage structures built to that standard. New York, like many other states, already requires two feet of freeboard to provide an added measure of protection for new development in the 100-year floodplain. Inclusion of the one-foot freeboard requirement into the International Residential Code would provide an increased level of flood protection in other parts of the country.

The rationale for New York's freeboard requirement is that if you build a structure with the top of the lowest floor at the base flood elevation, that flood would result in significant damages to the

floor supports as well as to the finished floor itself. We also know that when a floodplain is fully developed, the base flood elevation goes up by about one foot. By providing two feet of freeboard, the portion of the structure supporting the first floor should remain damage free during the 100-year flood (base flood). This does not account for the uncertainties associated with changing weather patterns, watershed development, blocked bridges, and other factors. Some of our members recommend three feet of freeboard based on the damages experienced in their communities. Any freeboard amount provides an extra margin of safety for higher flood levels.

In addition to reducing the susceptibility of new development to flood damages, the proposed one foot of freeboard requirement would also result in 20-40% savings in flood insurance premiums (since actuarial rates for new floodplain development are based on the level of protection relative to the base flood elevation). The added construction costs would be quickly recovered by the property owners due to the reduced cost of flood insurance. Moreover, in the event of a flood, this increased flood protection could become an investment that saves money, heartache, and perhaps even the lives of property owners.

The cost of flood damages in the U.S. has continued to escalate despite the implementation of federal floodplain development standards. The current standards clearly aren't good enough. If we are to reduce future flood damages, we will need to find creative ways to strengthen the existing tools and develop new strategies for managing flood risks. The proposed freeboard requirement is a cost-effective step in that direction.

Thank you for your thoughtful consideration of this issue. If you would like additional information, please contact me at 607-737-5271 or jthigpen@co.chemung.ny.us.