# The Federal Flood Risk Management Standard and FEMA Hazard Mitigation Assistance Programs

FEMA Policy 206-24-005 implements the Federal Flood Risk Management Standard (FFRMS). The FFRMS ensures Federal actions<sup>1</sup> located in flood-prone areas last as long as intended. The FFRMS establishes a national minimum flood risk management standard that considers current and future risk to strengthen community resilience against flooding. This fact sheet summarizes the significance of the FEMA FFRMS policy to applicants for Hazard Mitigation Assistance (HMA) grants. See the FEMA FFRMS Policy Fact Sheet for general information on the FFRMS.

# Applicability

The FEMA FFRMS policy is effective as of September 9, 2024, and applies to notices of funding opportunity (NOFOs) published and to disasters<sup>2</sup> declared on or after this date. The FEMA FFRMS policy applies to all HMA actions where FEMA funds are used for:

- structure elevation, mitigation reconstruction, or dry floodproofing; or
- new construction, substantial improvement, or repairs to address substantial damage.<sup>3</sup>

Applicable FEMA-funded actions within the FFRMS floodplain must be protected up to the FFRMS flood elevation. Structures must be protected through elevation (non-residential structures may be protected through elevation or dry floodproofing) and facilities through a means appropriate for the project.

The FEMA FFRMS policy applies to all HMA programs. The FEMA FFRMS policy supersedes policies that partially implement the FFRMS and FFRMS requirements included in program and policy guides.<sup>4</sup> The costs of FFRMS compliance are eligible costs subject to the applicable cost share.

## Applicable HMA Programs

- Building Resilient Infrastructure and Communities (BRIC)
- Flood Mitigation Assistance (FMA)
- Hazard Mitigation Grant Program (HMGP)
- HMGP Post Fire
- Pre-Disaster Mitigation Congressionally Directed Spending (PDM)
- Safeguarding Tomorrow Revolving Loan Fund (STRLF)

<sup>&</sup>lt;sup>4</sup> FFRMS partial implementation policy: Partial Implementation of the FFRMS for Hazard Mitigation Assistance (HMA) Programs (<u>FP 206-21-003-0001</u>). Policy guide: Hazard Mitigation Assistance Program and Policy Guide (<u>FP 206-21-0001</u>).





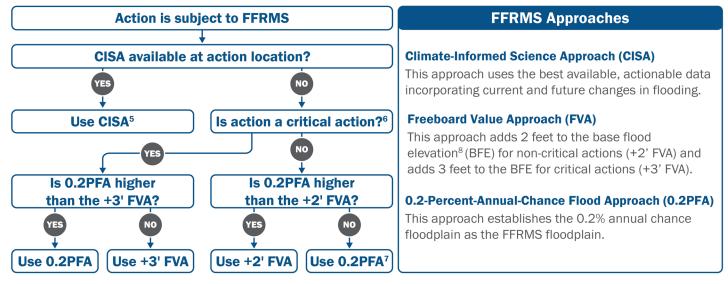
<sup>&</sup>lt;sup>1</sup> See FEMA Policy 206-24-005 for definition. Actions may include projects and/or portions of projects.

<sup>&</sup>lt;sup>2</sup> See <u>Hazard Mitigation Assistance Program and Policy Guide</u> for definition.

<sup>&</sup>lt;sup>3</sup> See FEMA Policy 206-24-005 for definitions. Note: cause of damage does not have to be from flooding.

## **Determining the FFRMS Floodplain**

There are three approaches for determining the FFRMS floodplain – the Climate-Informed Science Approach (CISA), the Freeboard Value Approach (FVA), and the 0.2-Percent-Annual-Chance Flood Approach (0.2PFA). The FEMA FFRMS policy explains how to determine the FFRMS Floodplain for FEMA actions. The process is summarized in Figure 1.



#### Figure 1. Flow chart describing how the FFRMS floodplain is determined & definitions of approaches

FEMA relies on the following interagency tools to determine the FFRMS floodplain: <u>Federal Flood Standard Support</u> <u>Tool</u> and the <u>FFRMS Floodplain Determination Job Aid</u>. Applicants may use the Federal Flood Standard Support Tool for project planning.<sup>9</sup>

## **Natural Features and Nature-Based Solutions**

The FFRMS also requires consideration of nature-based solutions<sup>10</sup> as project alternatives for all actions that may affect a floodplain or wetland and are subject to the alternatives analysis (Steps 3 and 6 of the 8-step process for floodplain management and wetlands protection) (44 CFR § 9.9). Nature-based solutions incorporate natural features and processes into project designs to reduce flood risk and promote resilience. Wherever possible, nature-based solutions shall be incorporated into actions that may affect floodplains or wetlands, even if they are not feasible as a standalone solution. When scoping and designing projects, applicants must consider nature-based solutions and use them where possible.

<sup>8</sup> Base Flood Elevation (BFE) = 1% annual chance flood elevation.

<sup>&</sup>lt;sup>5</sup> The CISA flood elevation must be at least as restrictive as the 1% annual-chance flood elevation for non-critical actions and the 0.2% annualchance flood elevation for critical actions.

<sup>&</sup>lt;sup>6</sup> See FEMA Policy 206-24-005 for definition.

<sup>&</sup>lt;sup>7</sup> In coastal areas, if 0.2% annual-chance flood elevations do not account for wave action, the appropriate FVA must be used.

<sup>&</sup>lt;sup>9</sup> Note that preliminary or advisory flood hazard information may not be accounted for in the Federal Flood Standard Support Tool. If applicants are aware of preliminary or advisory flood hazard information for their project location or would otherwise like technical assistance, they can contact their <u>FEMA Region</u>.

<sup>&</sup>lt;sup>10</sup> See FEMA Policy 206-24-005 for full definition.

## **Example FFRMS Scenarios**

Applicants need to consider FFRMS requirements when scoping and designing projects. A few scenarios applicants could encounter are described in this section.

**Scenario 1:** A residential area in a community experiences frequent flooding. The community submitted a structure elevation application under FMA to elevate 22 homes. Elevating these residential structures is considered a non-critical action. CISA data is available for the proposed action location, so that approach must be used to determine the FFRMS floodplain and height to which the residences must be elevated. This project also presents an opportunity to incorporate vegetated swales into the project to further minimize flooding impacts, which is consistent with the nature-based solution provisions of the FEMA FFRMS policy.

**Scenario 2:** A community submitted an HMGP wind-retrofit project for an existing fire station. The project would constitute substantial improvement to the structure, triggering FFRMS requirements. In this location CISA is not available. The project is a critical action, so the FFRMS policy requires elevation and/or dry floodproofing to protect the station within the FFRMS floodplain to the higher of the 0.2% annual chance flood elevation or +3 foot Freeboard Value Approach.

**Scenario 3:** A coastal community considered project alternatives to protect residential properties along an eroded shoreline, including a seawall and nature-based solutions such as a living shoreline. The applicant determined that a living shoreline would meet the needs of the community and submitted a BRIC application to FEMA to fund the project. The project is a non-critical action and CISA is not available in this location. The FEMA FFRMS policy requires protection to the lower of the 0.2% annual chance flood elevation or +2 foot Freeboard Value Approach.

## **Differences Between Partial Implementation Policies and FP 206-24-005**

Due to the timing of HMA Program delivery, partial implementation policy requirements may apply to certain projects. For disasters declared on or after the effective date of the FEMA FFRMS policy (September 9, 2024), and for NOFOs issued on or after this date, the FEMA FFRMS policy supersedes policies that partially implement the FFRMS and FFRMS requirements included in program and policy guides. Key differences between the partial implementation of the FFRMS and full FFRMS implementation for HMA are highlighted in Figure 2.

|  | Full Implementation<br>FP 206-24-005                          | Partial Implementation<br>FP 206-21-003-0001 <sup>11</sup>   | Partial Implementation<br>FP 206-21-0003                  |
|--|---|--|---|
| Applicable Dates of<br>NOFO Issuance and<br>Disaster Declaration | On or after<br>September 9, 2024                              | December 7, 2022 –<br>September 8, 2024  | August 27, 2021 –<br>December 6, 2022                     |
| Approaches to<br>Determine the<br>FFRMS Flood<br>Elevation       | CISA<br>0.2PFA<br>FVA   | 0.2PFA<br>FVA  | FVA   |
| Location of Actions<br>Relative to Floodplain                    | Actions (non-critical<br>and critical) in FFRMS<br>floodplain | Non-critical actions in<br>1% annual chance<br>floodplain and<br>critical actions in<br>0.2% annual chance<br>floodplain | Non-critical actions in<br>1% annual chance<br>floodplain |
| Floodplain Extents<br>Requirements                               | Horizontal and Vertical Extents                               | Vertical Extents   | Vertical Extents  |
| Applicable Action<br>Types                                       | Facilities and Structures                                     | Structures   | Structures  |
| Nature-Based<br>Solution<br>Requirements                         | Required  | No Requirements  | No Requirements   |

#### Figure 2: Partial and Full Implementation Policy Comparison for HMA

#### **FEMA FFRMS Resources**

For more information on the FFRMS and additional resources, please visit <u>Federal Flood Risk Management Standard</u> <u>| FEMA.gov</u>.

<sup>&</sup>lt;sup>11</sup> The requirements of FP-206-21-003-0001 were implemented into the HMA Program and Policy Guide (<u>FP 206-21-0001</u>), pages 66-67, as of March 23, 2023.