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Mr. Marc Ferzan
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Trenton, NJ 08625



December 14, 2012

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PO Box 001
Trenton, NJ 08625

Sent by mail and email: marc.ferzan@gov.state.nj.us

Re: Support for Demolish/Rebuild Post Hurricane Sandy
FEMA Hazard Mitigation Grant Program

Dear Mr. Ferzan:

The New Jersey Association for Floodplain Management (NJAFM)¹ is dedicated to reducing loss of life and property damage resulting from floods and promoting sound floodplain management at all levels of government. Our membership consists of public officials; first responders; local, state and federal agency employees; public and private engineers and planners, and floodplain managers. The New Jersey Association for Floodplain Management is one of 34 Chapters of the national Association of State Floodplain Managers (ASFPM) – our membership of over 200 professionals are among the 15,000 national and state members of the collective ASFPM that are engaged in protecting the public and its property.

It cannot be overstated that the State of New Jersey is at great risk from flooding due to our densely developed coastline and inland river floodplains. Hurricane Sandy resulted in loss of life and caused significant damages at a scale not previously experienced in New Jersey, but was the latest in a succession of major flood events. Since our organization's founding in 2004, part or all of New Jersey has been declared a Presidential Disaster Area due to flooding at least once per year, excluding 2008.

To protect the citizens, taxpayers, property and economy of the State, it is critical that we utilize the mitigation grant funding that will be available to the State from Hurricane Sandy to make New Jersey more resilient to future flood events. Post-disaster money comes to the Hazard Mitigation Grant Program (HMGP) authorized under the Stafford Act after the President declares a disaster, with an amount equivalent to 15% of the amount of disaster assistance allocated to the State to be authorized for mitigation grants at a 75% federal and 25% non-federal cost share.

The NJAFM strongly supports existing mitigation options available under the HMGP for voluntary acquisition of storm damaged and flood prone properties, elevation of structures and small structural projects (i.e. drainage system retrofits).. Given the scope of damages caused by Hurricane Sandy, NJAFM also supports the inclusion of Demolish/Rebuild (also called "mitigation reconstruction") as a technique to

¹ www.njafm.org

complement a community's planning and rebuilding efforts.² Demolish/Rebuild as a mitigation option, would provide funding toward razing a structure and replacing it on the same lot at a higher elevation. This is especially important in the more modest, older coastal communities that were realized before modern regulations came into force. A large number of these structures experienced major damage and are not stable enough to elevate and do not possess the characteristics of modern building standards. The result of this mitigation option is a significant reduction in damage potential and future recovery costs.

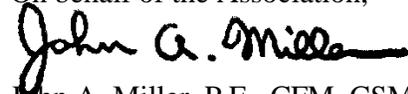
For Demolish/Rebuild, new structure would have to meet state and federal regulations and codes and must comply with the Advisory Base Flood Elevations to be released by FEMA this month. It is NJAFM's strong opinion that a minimum of two feet of freeboard be added to the ABFE/new mapping elevations for the options available through HMGP to provide additional protection from future storm and flood events. Other conditions that need to be incorporated into the Demolish/Rebuild option include:

1. Demolish/Rebuild should be a secondary option and only thoughtfully considered in Coastal V Zones and should not be permitted in Riverine Floodways as these are inherently unsafe;
2. The Demolish/Rebuild option should be considered only in consultation with the local all Hazard Mitigation Plan and the municipal Master Plan. The Master Plan should be reexamined prior to making a HMGP application to ensure consistency with modified community goals influenced by Hurricane Sandy, such as providing space for the creation and maintenance of dunes and dune like structures that provide common storm damage protection;
3. A FEMA NFIP Benefit-Cost Analysis is needed for all structures considered for Demolish/Rebuild.

Benefits of using Demolish/Rebuild as a mitigation option are apparent: new structures would be constructed in compliance with state and federal standards, and building codes; the community's resiliency would be strengthened with structures built to higher standards; residents will be safer; and future recovery costs would be reduced. In concert with voluntary acquisitions, elevations of stable structures and small structural retrofits, Demolish/Rebuild can be an important component of a community's recovery after Hurricane Sandy.

In summary, the New Jersey Association for Floodplain Management strongly supports the Demolish/Rebuild mitigation option in light of the pressing needs of New Jersey's impacted communities. Promoting Demolish/Rebuild ultimately makes for safer neighborhoods, reduces burden on taxpayers and government entities, and fosters resilient, more hazard sustainable communities. We look forward to continuing to work with you to promote good policy, risk awareness, professionalism and sound floodplain management.

On behalf of the Association,



John A. Miller, P.E., CFM, CSM
Legislative Committee Chair
Certified Floodplain Manager

c: NJAFM Board by email

² Statutory citations and detail are found in the ASFPM Mitigation Committee's White Paper found here: http://www.floods.org/PDF/ASFPM_White_Paper_Demo-Rebuild_0806.pdf