Welcome to a Silver Jackets Webinar

The CRS and Repetitive Loss Area Analysis (RLAA)

For audio,
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Security code: 4567
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18 yrs as the Flood Training Coordinator for FEMA’s CRS Program.
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Bachelor and Master’s Degree in Urban and Regional Planning from Ball State University in Indiana
Repetitive Loss Properties and the CRS
Repetitive Loss Properties and the CRS

Overview
Section 501 – The Repetitive Loss List
  • The Privacy Act
Section 502 – Repetitive Loss Category
  • CRS requirements
Section 503 – Repetitive Loss Areas
  • How to identify
Section 504 – Repetitive Loss Area Outreach Project
Section 510 (512 b.) – Repetitive Loss Area Analysis (RLAA)
  • 5-step planning process

See Coordinator’s Manual, Pages 500-3-12
Repetitive Loss Properties and the CRS

501.a. Repetitive Losses

Repetitive loss:
• 2 claims greater than $1,000 in any 10 year period since 1978

Severe repetitive loss (SRL): Repetitive loss property with:
• Four claims greater than $5,000 or
• Two or more claims that are greater than the building’s value

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.

See Coordinator’s Manual, Page 500-3
Repetitive Loss Areas

NFIP Repetitive Loss Properties

✓ 160,000 repetitive loss properties in US
✓ 70,000 currently insured (approximately 44%)
✓ 10,000 severe repetitive loss properties
✓ Historically, repetitive loss properties represent 1.3% of all NFIP policies
✓ Represent 15% – 20% of all NFIP claims

Approximately 5 million flood insurance policies in the US
501.b. The Repetitive Loss List

Applications or cycle visits:

✓ Ask your ISO/CRS Specialist for your repetitive loss data.

✓ Not a cycle or new application, ask FEMA or state for data.

✓ You will get the rep loss Excel file and PDF worksheets (AW-501).

✓ Also Excel files with active policies and past claims.

See Coordinator’s Manual, Page 500-3
The Privacy Act

- Flood insurance data, including repetitive loss data, has Personally Identifiable Information (PII), such as the addresses of insured properties.
- PII is protected under the Privacy Act of 1974.
- FEMA collects data with Names and/or Addresses (Policy Holders, Insurance Claims, Repetitive Loss Properties) Private Insurance.
- Protect FEMA data when working locally with PPI.
The Privacy Act: *Working with FEMA data*

- General or aggregated information not connected to a particular property may be made public.

### Repetitive Loss Properties

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See Coordinator’s Manual, Page 500-3
Repetitive Loss Properties

The Privacy Act

✓ General or aggregated information not connected to a particular property may be made public.

See Coordinator’s Manual, Page 500-3
Repetitive Loss Properties

501.c. Updating the List

Review each property for:

✓ Correct address
✓ In your community
✓ Actually 2 floods
✓ Removed or otherwise mitigated

Documentation is key for updating!!

See Coordinator’s Manual, Pages 500-4 - 5

NFIP/Community Rating System
Repetitive Loss Properties

501.c Updating the List

Paperwork:

- Must review the list
- Correct and/or update the AW-501s
- Minimum: at application and cycle

It is good idea to review the list annually

See Coordinator’s Manual, Page 500-4
Repetitive Loss Properties

501.c Updating the List
If changes to the repetitive loss list
- Signed CC-RL
- Corrected or updated AW-501s
- Signed transmittal sheet

If no changes to the repetitive loss list
- Signed CC-RL

See Coordinator’s Manual, Page 500-4
Repetitive Loss Properties

502 Repetitive loss category

After correcting and updating the AW-501s

Category A: No repetitive loss properties

Category B: 1 – 49 repetitive loss properties

Category C: 50+ repetitive loss properties

See Coordinator’s Manual, Page 500-7
Repetitive Loss Properties

502 Repetitive loss category

After correcting and updating the AW-501s

Category A: No repetitive loss properties or whose repetitive loss properties all have been mitigated

✓ No requirements

See Coordinator’s Manual, Page 500-7
Repetitive Loss Properties

502 Repetitive loss category

After correcting and updating the AW-501s

Category B: 1 – 49 repetitive loss properties

✓ Prepare a map of the repetitive loss area(s)
✓ Review and describe its repetitive loss problem,
✓ Prepare a list of the addresses of all properties with insurable buildings in those areas, and
✓ Undertake an annual outreach project to those addresses

See Coordinator’s Manual, Page 500-7
Repetitive Loss Properties

502 Repetitive loss category

After correcting and updating the AW-501s

Category C: 50+ repetitive loss properties

- Prepare a map of the repetitive loss area(s)
- Review and describe its repetitive loss problem,
- Prepare a list of the addresses of all properties with insurable buildings in those areas, and
- Undertake an annual outreach project to those addresses
- Activity 510 RLAA or FMP credit

See Coordinator’s Manual, Page 500-7
Repetitive Loss Properties

502.b. Effective dates

Category changes when number of repetitive losses change

Effective:
(1) When crediting 510 (Floodplain Management Planning)
(2) When modifying for a class increase
(3) At the cycle visit

Must meet new category requirements the following year

See Coordinator’s Manual, Page 500-8
Repetitive Loss Areas

503 Repetitive loss areas

At each visit, a Category B or C community must submit:
(1) AW-501s (if needed)
(2) Signed CC-RL
(3) Map of repetitive loss areas
(4) Describe the cause of the repetitive flooding
(5) List of addresses and the number of buildings in each of the mapped areas
(6) Undertake an annual outreach project to those addresses

See Coordinator’s Manual, Page 500-8
Repetitive Loss Areas

503.a The Map

Mapping Repetitive Loss Areas

To participate in the Community Rating System, a community with one or more repetitive loss properties must take certain actions and address those properties. Communities in the CRS or applying to join are given a list of addresses of its repetitive loss properties and the dates of the flood insurance claims. The community must review the list for accuracy and other items as explained in Section 501 of the CRS Coordinator’s Manual.

The community’s repetitive loss category is based on the list after it has been updated to reflect the review’s findings. This is explained in Section 502 of the Coordinator’s Manual. Category B and C communities have one or more repetitive loss properties after an update. They must:

(a) Prepare a map of the repetitive loss area(s).

(b) Review and describe their repetitive loss problems.

(c) Prepare a list of the addresses of all properties in repetitive buildings in those areas, and

(d) Undertake an annual outreach project to those addresses.

In addition, Category C communities with 10 or more repetitive loss properties must prepare plans or area analyses for their repetitive loss areas.

Repetitive Loss Areas: Note the stress on repetitive loss “areas.” Many communities want to address only the individual properties on the updated list. It is important to note that the only reason a property appears on FEMA’s list is because the structure had flood insurance and received two or more claims of at least $1,000 during any given 10-year period. These properties are merely representative of the community’s repetitive flooding problem, and

indicate the location of most, but perhaps not all, of its repetitively flooded areas.

Other structures near the ones listed by FEMA may have been insured during the floor, may have had single flood insurance claims, or may have had multiple claims under different policies that the system did not recognize as being the same repetitively flooded address.

From a community perspective, it is not fair to single out those properties that happen to be on FEMA’s list. All properties with the same exposure to repeated flood damage should be addressed.

Therefore, the CRS requirement is for the community to map its repetitive loss areas.

www.crsresoucres.org

500 Series – General Materials

See Mapping Repetitive Loss Areas, Page 1

NFIP/Community Rating System

Visual 10.20
Repetitive Loss Areas

The Privacy Act of 1974

Flood insurance data about private property, including repetitive loss properties, are protected under the Privacy Act. Personally identifiable information such as the names or addresses of specific properties, whether they are covered by flood insurance or not, whether they have received flood insurance claims, or the amounts of such claims MAY NOT be released outside of local government agencies or to the public or used for solicitation or other purposes.

Such information should be marked “For internal use only. Protected by the Privacy Act of 1974.” FEMA has a cover sheet that is helpful in reminding users about how to handle this sensitive information.

General or aggregated information, such as total claims paid for a community or an area, or data not connected to a particular property MAY be made public. For example, a community may publish a map showing a repetitive loss area or a list of addresses in that area, provided that it does not show which individual addresses or parcels received flood insurance claim payments.

See Mapping Repetitive Loss Areas, Page 2
Repetitive Loss Areas

1. Locate the properties on the *updated* rep loss list

See Mapping Repetitive Loss Areas, Page 2
2. Locate nearby properties that received 1 insurance claim

- These are listed in the “historical claims” Excel file

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<th>Pol Eff Dt</th>
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Repetitive Loss Areas

2. Locate nearby properties that received 1 insurance claim

See Mapping Repetitive Loss Areas, Page 2
Repetitive Loss Areas

3. If you have the capability, overlay a topographic map (GIS) layer to identify low areas.

4. Draw lines around those areas with similarly situated properties:
   - Same low elevation
   - History of flood insurance claims
   - Similar construction (i.e. slab on grade)

See Mapping Repetitive Loss Areas, Page 3
Repetitive Loss Areas

4. Draw lines around those areas with similarly situated properties

See Mapping Repetitive Loss Areas, Page 3
4. Draw lines around those areas with similarly situated properties

See Mapping Repetitive Loss Areas, Page 3
Repetitive Loss Areas

5. Check the area in the field
See if the buildings on FEMA’s list are unique (e.g., only one(s) on slab at grade)

See Mapping Repetitive Loss Areas, Page 3
5. Check the area in the field
See if the buildings on FEMA’s list are unique (e.g., only one(s) on slab at grade)
6. A visit to the site helps confirm that the boundary makes sense
6. A visit to the site helps confirm that the boundary makes sense
7. If these “remote” ways to determine the repetitive loss area boundary don’t explain why an area is flooded repeatedly, contact the property owners.
Repetitive Loss Areas

7. Contact the property owners
Pool deck is 6” above the paved lanai surface.

See Mapping Repetitive Loss Areas, Page 3
Repetitive Loss Areas

7. Contact the property owners

See Mapping Repetitive Loss Areas, Page 3
8. If there is only one building in an area, document why

If 100% on FEMA’s list, use a large dot for the public map

See Mapping Repetitive Loss Areas, Page 3
Repetitive Loss Area # 1

- 15 total properties
- 2 repetitive loss properties
- 0 severe repetitive loss properties
- 1 historical claim
- 12 properties same or similar flood condition

Problem:

Swale in back yards filled in with dirt and fences. No clear drainage path for water and limited outfall.

See Mapping Repetitive Loss Areas, Page 3
Repetitive Loss Areas

Repetitive Loss Area Map

Area #3
Monitor Square
103rd & Rosewood

= Repetitive loss area
Repetitive Loss Areas
Some repetitive loss areas may be partially or fully in an X-Zone.
9. If a lot of repetitive losses spread throughout your community or floodplain, you can declare your entire community or floodplain to be a repetitive loss area.

See Mapping Repetitive Loss Areas, Page 3
Repetitive Loss Areas

The map the public sees must not show any individual properties on FEMA’s repetitive loss list.

Prepare a list of the addresses of all improved parcels in the designated areas (private).

Improved parcel = insurable building

See Mapping Repetitive Loss Areas, Page 3
Repetitive Loss Areas

503 Repetitive loss areas
At each visit, a Category B or C community must submit:
(3) Map of repetitive loss areas
(4) Describe the cause of the repetitive flooding
(5) List of addresses and the number of buildings in each of the mapped areas
(6) Undertake an annual outreach project to those addresses

See Coordinator’s Manual, Page 500-7
Repetitive Loss Areas

504 Repetitive loss area outreach project
Category B or C community must send out a notice that:
(1) Says the property is in or near an area subject to flooding.
(2) Explains property protection measures
(3) Covers sources of financial assistance
(4) Includes basic facts about flood insurance

Send to ALL properties in rep loss AREAS
   Can be a targeted project or a PPI project
Copy included with annual recertification

See Coordinator’s Manual, Page 500-10
Excerpt from sample outreach:

Dear Resident:
You have received this letter because your property is in an area that has been flooded several times. Our community is concerned about repetitive flooding and has an active program to help you protect yourself and your property from future flooding, but here are some things you can do:

Check with the Building Department on the extent of past flooding in your area. Department staff can tell you about the causes of repetitive flooding, what the City is doing about it, and what would be an appropriate flood protection level. The staff can visit your property to discuss flood protection alternatives.

1. Prepare for flooding by doing the following:
   - Know how to shut off the electricity and gas to your house when a flood comes.
   - Make a list of emergency numbers and identify a safe place to go.
   - Make a household inventory, especially of basement contents.
   - Put insurance policies, valuable papers, medicine, etc., in a safe place.
   - Collect and put cleaning supplies, camera, waterproof boots, etc., in a handy place.
   - Develop a disaster response plan. See the Red Cross’s website at www.redcross.org for information about preparing your home and family for a disaster.
   - Get a copy of Repairing Your Flooded Home. We have copies at the Public Works Department or it can be found on the Red Cross’ website, too.

2. Consider some permanent flood protection measures.
   - Mark your fuse or breaker box to show the circuits to the floodable areas. Turning off the power to the basement before a flood can reduce property damage and save lives.
   - Consider elevating your house above flood levels.

See Coordinator’s Manual, Page 500-11
Repetitive Loss Areas

Summary

• Repetitive loss property information is private and not for public distribution

• Map the repetitive loss area(s), do not show the individual properties

• Description of the flooding at each repetitive loss area

• Outreach must be sent to the repetitive loss area(s) annually (list of addresses)
Activity 510 (Floodplain Management Planning)

510 Floodplain Management Planning
Activity 510 (Floodplain Management Planning)

Activity 510 Overview

This activity credits the plans that examine strategies to reduce the adverse impact of floods on the community and help meet other community needs.

Activity 510 Element

a. Floodplain Management Planning (FMP) (up to 382 points)
b. Repetitive Loss Area Analysis (RLAA) (up to 140 points)
c. Natural Floodplain Functions Plan (NFP) (up to 100 points)
Activity 510 (Floodplain Management Planning)

512.b. Repetitive Loss Area Analysis (RLAA)

More in-depth plan for small area(s)

Five step planning process

1. Advise all properties
2. Contact other agencies
3. Collect data on each building
4. Review alternative approaches
5. Document the findings

www.floodhelp.uno.edu

See Coordinator’s Manual, Pages 510-29 - 32
512.b. Credit criteria for the RLAA

To receive credit for an RLAA, the following must occur:

1. At least one or more repetitive loss properties on FEMA’s list and at least one area delineated according to Section 503 except for Category C communities
   - One exception communities with no historic flood claims but are working to reduce repetitive flooding

2. An area analyses must have been prepared and adopted for each repetitive loss area
   - The repetitive loss areas must be mapped as described in Section 503
   - If the community does not conduct an analysis of all the areas, credit will be pro-rated

See Coordinator’s Manual, Pages 510-29 - 32
Activity 510 (Floodplain Management Planning)

512.b. Credit Criteria for the RLAA

Five step planning process
1. Advise all properties
2. Contact other agencies
3. Collect data on each building
4. Review alternative approaches
5. Document the findings

Steps 2 through 4 can occur in any order

See Coordinator’s Manual, Pages 510-29 - 32
Activity 510 (Floodplain Management Planning)

512.b. Credit Criteria for the RLAA

Five step planning process
1. Advise all properties

   Upfront notification advising all properties in the repetitive loss areas will be conducted and request their input on the hazards and recommended actions.

   This notice cannot identify which properties are on FEMA’s list. However, there are no restrictions on publicizing what properties are in repetitive loss AREAS that have more than one property.

See Coordinator’s Manual, Pages 510-29 - 32
Activity 510 (Floodplain Management Planning)

512.b. Credit Criteria for the RLAA

Five step planning process

1. Advise all properties
   • The notice can be sent to owners or residents at the community’s discretion, as long as a representative of each property is notified
   • The notice must indicate when and how residents can obtain copies of the draft report and make comments

See Coordinator’s Manual, Pages 510-29 - 32
Activity 510 (Floodplain Management Planning)

See Coordinator’s Manual, Pages 510-29 - 32
Q7: What do you feel was the cause of your flooding?

<table>
<thead>
<tr>
<th>Answer Choices</th>
<th>Percentage</th>
<th>Number Responding</th>
</tr>
</thead>
<tbody>
<tr>
<td>Storm sewer backup</td>
<td>35</td>
<td>44</td>
</tr>
<tr>
<td>Sanitary sewer backup</td>
<td>2</td>
<td>3</td>
</tr>
<tr>
<td>Standing water next to house/building</td>
<td>11</td>
<td>14</td>
</tr>
<tr>
<td>Drainage from nearby properties</td>
<td>18</td>
<td>23</td>
</tr>
<tr>
<td>Saturated ground/leads in basement walls</td>
<td>7</td>
<td>9</td>
</tr>
<tr>
<td>Overbank flooding</td>
<td>13</td>
<td>17</td>
</tr>
<tr>
<td>Other</td>
<td>13</td>
<td>17</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>100</strong></td>
<td><strong>127</strong></td>
</tr>
</tbody>
</table>
Activity 510 (Floodplain Management Planning)

512.b. Credit Criteria for the RLAA

Five step planning process

1. Advise all properties
   • The notice cannot be done via
     ▪ Newspaper
     ▪ Newsletter
     ▪ Article

See Coordinator’s Manual, Pages 510-29 - 32
Activity 510 (Floodplain Management Planning)

512.b. Credit Criteria for the RLAA

Five step planning process

2. Contact other agencies

Contact agencies and organizations that may have data, plans or studies that could affect or the cause or impacts of the flooding

In community and outside of community

See Coordinator’s Manual, Pages 510-29 - 32
Activity 510 (Floodplain Management Planning)

512.b. Credit Criteria for the RLAA

Five step planning process

2. Contact other agencies

In community: Stormwater/Public Works/Planning & Development, CIP projects, HOA’s, etc.


See Coordinator’s Manual, Pages 510-29 - 32

NFIP/Community Rating System
Activity 510 (Floodplain Management Planning)

512.b. Credit Criteria for the RLAA

Five step planning process

3. Collect data on each building

Site visit must collect data sufficient to do a preliminary determination of the cause of repetitive flooding and the mitigation measures that would be appropriate

- drainage patterns around the building
- condition of the structure and foundation
- Elevation of HVAC units
- Guttering and downspouts
- Nearby storm drains

See Coordinator’s Manual, Pages 510-29 - 32
512.b. Credit Criteria for the RLAA

Five step planning process

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See Coordinator’s Manual, Pages 510-29 - 32
Activity 510 (Floodplain Management Planning)

512.b. Credit Criteria for the RLAA

Five step planning process

3. Collect data on each building

The person collecting the data on the buildings should not have to enter the property

Floor elevations or historical flood levels are not required but can be helpful

The date and amount of insurance claims can be helpful in determining the type of damage to the building and amount of damage

See Coordinator’s Manual, Pages 510-29 - 32
Activity 510 (Floodplain Management Planning)

512.b. Credit Criteria for the RLAA

Five step planning process

3. Collect data on each building

FEMA 551 can provide more information on appropriate mitigation measures for Floodprone structures

Floor elevations or historical flood levels are not required but can be helpful

Collecting and organizing data can be done using the “limited data view” of the National Flood Mitigation Data Collection Tool

See Coordinator’s Manual, Pages 510-29 - 32
Activity 510 (Floodplain Management Planning)

See Coordinator’s Manual, Pages 510-29 - 32
Activity 510 (Floodplain Management Planning)

512.b. Credit Criteria for the RLAA

Five step planning process

3. Collect data on each building

See Coordinator’s Manual, Pages 510-29 - 32
Activity 510 (Floodplain Management Planning)

512.b. Credit Criteria for the RLAA

Five step planning process

3. Collect data on each building

See Coordinator’s Manual, Pages 510-29 - 32
Activity 510 (Floodplain Management Planning)

512.b. Credit Criteria for the RLAA

Five step planning process

3. Collect data on each building

See Coordinator’s Manual, Pages 510-29 - 32
Activity 510 (Floodplain Management Planning)

512.b. Credit Criteria for the RLAA

Five step planning process

4. Review alternative approaches

- Determine if any property protection measures or drainage improvements are feasible
- Always include purchase of flood insurance (structure and/or contents coverage)
- Different types of building construction may require different mitigation approaches
- At a minimum, the review must include the property protection measures listed in Figure 360-1 and 510-4

See Coordinator’s Manual, Pages 510-29 - 32
Activity 510 (Floodplain Management Planning)

512.b. Credit Criteria for the RLAA

Five step planning process

4. Review alternative approaches

To protect property from flood damage...

- 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 floodproof the building so water cannot get into it.
- Wet floodproof 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.

Figure 360-1. Typical property protection measures.

See Coordinator’s Manual, Pages 510-29 - 32
Activity 510 (Floodplain Management Planning)

512.b. Credit Criteria for the RLAA

Five step planning process

4. Review alternative approaches

Table 9 - Advantages and Disadvantages of Acquisition

<table>
<thead>
<tr>
<th>Advantages</th>
<th>Disadvantages</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Permanently removes problem since the structure no longer exists.</td>
<td>• Cost may be prohibitive.</td>
</tr>
<tr>
<td>• Allows a substantially damaged or substantially improved structure to be brought into compliance with the community’s floodplain management ordinance or law.</td>
<td>• Resistance may be encountered by local communities due to loss of tax base, maintenance of empty lots, and liability for injuries on empty, community-owned lots.</td>
</tr>
<tr>
<td>• Expands open space and enhances natural and beneficial uses.</td>
<td></td>
</tr>
<tr>
<td>• May be fundable under FEMA mitigation grant programs.</td>
<td></td>
</tr>
</tbody>
</table>
Activity 510 (Floodplain Management Planning)

512.b. Credit Criteria for the RLAA

Five step planning process

5. Document the findings

- A separate analysis must be conducted for each area – separate reports are preferred for each area
  - Different building construction
  - Different mitigation measures
  - Different flooding characteristics

See Coordinator’s Manual, Pages 510-29 - 32
Activity 510 (Floodplain Management Planning)

512.b. Credit Criteria for the RLAA

Five step planning process

5. Document the findings

- **Area 1** – Downtown historic buildings with basements (Riverine flooding)
- **Area 2** – Single-family crawlspace and slab on grade construction (local stormwater)
- **Area 3** – Coastal with some elevated buildings

See Coordinator’s Manual, Pages 510-29 - 32
Activity 510 (Floodplain Management Planning)

512.b. Credit Criteria for the RLAA

Five step planning process

5. Document the findings

- Process followed – how property owners were included
- Problem statement with map of the affected area
- List or table showing basic information for each building
- Alternative approaches reviewed
- Action plan including
  - Who is responsible
  - When it will be completed
  - How it will be funded

See Coordinator’s Manual, Pages 510-29 - 32
512.b. Repetitive Loss Area Analysis (RLAA)

Credit criteria

(1) Must have at least one repetitive loss area
(2) Follow the five step process
(3) Adopted by governing body and available to the public*
(4) Annual evaluation report
(5) Update by each CRS cycle visit

* Privacy Act applies. Summary report may be needed.

See Coordinator’s Manual, Pages 510-29 - 34
Activity 510 (Floodplain Management Planning)

“Developing a Repetitive Loss Area Analysis (RLAA)”

Available at CRSresources.org/500

See Coordinator’s Manual, Pages 510-16 - 18
Activity 510 (Floodplain Management Planning)

512.b. Repetitive Loss Area Analysis (RLAA)

Credit points

\[
\text{RLAA} = 140 \times \frac{\text{number of buildings in analyses}}{\text{number of buildings in repetitive loss areas}}
\]

A RLAA must be developed for all repetitive loss areas to meet the Category C requirements.

See Coordinator’s Manual, Pages 510-29 - 34
Activity 510 (Floodplain Management Planning)

Questions?