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MEMORANDUM

TO: Village Council

FROM: Kyle Coleman, Assistant to the Village Manager

DATE: May 27, 2020

SUBJECT: CRS Program Assistance Proposal

Greetings Council,

Included below is an outline of the *National Flood Insurance Community Rating System (CRS)* and a plan of action for Estero, as it relates to the CRS. We are recommending that we contract with JR Evans Engineering to provide us with one on-site employee, at a part-time level.

The CRS program rates our community, annually, on our floodplain management activities. The score that they provide communities (from 10 to 1, with 1 being the best) determines the level of discount that residents are provided on their flood insurance premiums (an additional 5% discount is provided for each successive score improvement). Currently, the Village has a score of 6, which compares to a 5 for the unincorporated portion of Lee County and a 6 for the City of Bonita Springs.

We do not believe that we will be able to maintain or improve our current score without additional assistance. Our current efforts are outpaced by the CRS program's requirements and we will face a more stringent review by the program this year. There are several means available to the Village to obtain this additional assistance, which are outlined in the text to follow. Staff is recommending that a part-time employee be provided via contract with JR Evans Engineering, given our desire for "government-lite" and our previous work with this firm on the CRS program. These services would allow the Village to maintain our current score and would cost up to \$150,000 annually. The proposed Supplemental Task Agreement with JR Evans Engineering is attached, for your review.

Background

The CRS is a program administered by the Federal Emergency Management Administration (FEMA), which describes CRS as, "a voluntary incentive program that recognizes and encourages community floodplain management activities that exceed the minimum program requirements."

Each municipality is evaluated by FEMA regularly and provided a score, indicating each municipality's success in advancing the three goals of the CRS. These goals are provided, below.

1. Reduce flood damage to insurable property;
2. Strengthen and support the insurance aspects of the National Flood Insurance Program, and
3. Encourage a comprehensive approach to floodplain management.

Each progressive score improvement, moving from 10 to 1, will result in an additional 5% reduction in resident's flood insurance rates. The Village currently has a score of 6, which means that we are providing a 20% in flood insurance premiums to our residents. It is estimated that each score improvement represents about \$300,000 in annual savings to Village residents. Given our current score, we estimate that our efforts save Village residents over \$1 million annually.

Today, the Village manages this program through a combination of staff, contracted staff, and consultant efforts. Although this approach has been successful thus far, as we have attained a score of 6 much faster than anticipated (Bonita Springs, for example, took approximately 10 years to accomplish this goal), it is not sustainable. Deferred efforts, coupled with contracted staff attrition and ineffectiveness, make it likely that a score decrease will occur when the next in-depth FEMA review occurs in 2020. The recommendations to follow are a direct response to this looming threat.

Staffing Mechanism Options

There are a variety of options available to the Village. These are listed below and will be examined more thoroughly in the text to follow.

1. Continue with the current policy. This will continue to cost the Village approximately \$30,000 annually and will likely lead to the Village's CRS score declining to a 7.
2. Recruit, hire, and train a full or part-time Village employee to coordinate this process.
3. Enter into a contract with an outside agency to provide full or part-time services.

Option 1: Status quo

The advantage of this option is that it presents no additional cost to the Village. Our operations will continue as-is, via a combination of Village and Calvin, Giordano and Associates (CGA) staff and off-site consultant assistance.

The disadvantage of this option is that it limits our ability to improve, as Village and contract staff are already constrained and the value of outside consultant assistance is limited. Much of the needed, additional effort is in relation to daily tasks, meetings, and documentation, which are best completed by onsite staff. It is important to contextualize our current score of 6, as well as our likely downgrade to a 7; the Lee County unincorporated area was recently recertified with a score of 5. So, residents of Estero have already seen a cost increase of 5% on their flood insurance since incorporation, and will likely experience an additional 5% increase if option 1 is chosen.

Option 2: Employee assistance

The advantage of this option is that it greatly increases the likelihood that we maintain or improve our CRS score, which means savings for our residents. Also, this staff member could offset some of the work being done by our current Village and CGA staff. Providing assistance to our stretched

building, planning, and zoning teams would improve customer service. Lastly, we can add unique experience to our team. We believe that one of the strengths of government-lite, and our particular version of it, is the opportunity it presents for cross-function collaboration at the highest level of staff. By hiring someone with experience in floodplain management and community education, we believe this will diversify our knowledge base and improve our team.

The disadvantages of this option are two-fold, as it not only adds a new operating cost, it places this cost onto the (relatively) fixed portion of our budget (Village staffing). This would grow our Village administrative footprint, which should be weighed against its benefits.

Option 3: Contract assistance

We believe that this is the ideal solution. This option provides the Village with the operational benefits of option 2, as this contracted employee would have a minimum number of mandated office hours. At the same time, it adds a contract cost that can easily be modified in the future should conditions or priorities change, as opposed to employee growth, which presents less flexibility. This option provides the Village with additional short-term capacity without a long-term liability.

Staffing Level Options

Option 1: Status quo

As outlined above, this policy would limit our costs to their current level at approximately \$30,000 per year. However, this would not increase our capacity and would very likely lead to our CRS score falling from a 6 to a 7. This would result in a 5% increase in flood insurance premiums for Estero residents.

Option 2: Part-time assistance

We believe that this is the ideal solution. This would cost the Village approximately \$150,000 annually, but would greatly increase the likelihood that we maintain our current CRS score of 6, while testing the viability of the proposed staffing arrangement. In this way, the Village will be taking a conservative approach, building this program via careful, incremental steps. Should this work well, the Village could easily “ramp up” this program to full-time assistance and apply for a rescoring by FEMA (with the hope that we could further improve our score to a 5).

Option 3: Full-time assistance

This approach would cost the Village approximately \$250,000 annually and would provide us with a much stronger chance of not only maintaining our current CRS score of 6, but potentially improving this score to a 5. However, given the size of our government and our commitment to “government-lite”, any increase of a full-time equivalent employee should be considered carefully. This would be a significant growth of staff and, if employed via contract with a firm other than CGA, would be the first such arrangement. With this in mind, we believe that it would be more prudent to take this approach slowly and perfect the logistics before considering a full-time arrangement.

Recommendation

To simplify the options available, a matrix has been provided below (with letters and colors for discussion purposes). We are recommending Choice C.

		Mechanism		
		Status Quo	Employee	Contract
Level	Status Quo	Choice A		
	Part-time		Choice B	Choice C
	Full-time		Choice D	Choice E

Implementation

Discussions have taken place with JR Evans Engineering, as they are our current contract provider for CRS consultant services. Together, we have outlined the typical daily tasks, responsibilities, position title and structure, and qualifications for this position. These are provided below.

Daily Tasks

The table below identifies tasks to be transferred from Village and CGA staff to the “CRS Coordinator” position, as well as those roles to be shared, under this proposal. This list was created in concert with our current CRS consultant, JR Evans Engineering.

Task	Shared/ transferred/ needed	Comments
Elevation certificates (CRS activity 310)	Shared	Required for both building & CRS program and currently the principal planner is doing both functions. CRS coordinator to take lead on CRS review and logging.
V-zone & flood-proofing certificates review (CRS activity 310)	Transferred	CRS coordinator would complete review and provide documentation for CRS, with building & planning providing initial screening and appropriateness.
Plan review for floodplain/Florida building code (CRS activities 213, 310, & 430)	Shared	CRS coordinator would enhance floodplain review & compliance, assuring documentation and logging for CRS credits
Public information flood outreach (CRS activities 320, 330, 350 & 610)	Transferred/ needed	Currently not sufficient for many CRS credits. CRS coordinator would be the lead for handouts, web information, seminars, and coordination with outside agencies and stakeholders.
Lee County program for public	Transferred/ needed	Currently not maintained (adopted by ordinance 2015-62), this program is managed by Lee County and is a rich source

information for public information) (CRS activity 330)		of extra CRS points. The CRS coordinator would leverage through quarterly participation.
Flood maps (firm) (CRS activity 320)	Transferred	CRS coordinator to take lead with monitoring status of the Village of Estero firms and provide guidance to public and staff.
Letter of map changes (CRS activity 430)	Transferred/shared	CRS coordinator to take lead and provide screening and guidance to building and planning staff.
Open space program for public information (CRS activity 420)	Transferred/shared	CRS coordinator to take lead of monitoring and assuring proper documentation from the principal planner.
CRS impact adjustment map (CRS activity 213 & 610)	Needed	Never transferred from Lee County and needed by 2021.
Flood information (CRS activity 320, 330, & 440)	Transferred/shared	This function is comprised of public inquiries and staff guidance. CRS coordinator would take lead on addressing inquiries and documenting responses.
Web page (CRS activity 350, 420, 510 & 610)	Shared	CRS coordinator to take lead assuring accurate information and proper functionality with it, as well as integration with building, planning and other departments.
Flood data maintenance (CRS activity 440)	Transferred/needed	CRS coordinator to take lead from planning department to properly log and document this function for CRS credit.
Storm water CRS (CRS activity 530)	Shared	CRS coordinator to work with staff to have the current 2018 storm water master plan formally adopted and scored for CRS credit points.
Public utility CRS (CRS activity 540)	Shared	CRS coordinator to work with staff to document existing eligible functions through sops, logs and other documentation.
Floodplain management plan (CRS activity 510 & 610)	Transferred	This function is currently managed by the assistant to the village manager, which involves quarterly meetings, documentation of participation and production of annual progress report for CRS submission. The CRS coordinator would be responsible for this function.
Flood warning program (CRS activity 320 & 610)	Transferred/needed	This function is currently managed by the principal planner and requires coordination with Lee County per the adopted county comprehensive emergency management plan. CRS credits require attendance to periodic meetings related to the program for public information and local mitigation strategy programs and documentation of participation in the annual flood/hurricane exercise. The CRS coordinator would be responsible for this function.

Attendance & participation in various Lee County/local floodplain organizations/CRS users group	Transferred	Groups/organizations include: Lee County local mitigation strategy (local mitigation strategy) working group; southwest Florida CRS users group; Lee County emergency management hurricane/flood exercise; storm ready – storm spotter training; Florida floodplain managers conference; state of Florida floodplain regional meetings; south Florida water management district meetings affecting the CRS; and various local training and FEMA meetings relating to CRS
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Responsibilities

The role’s responsibilities include the following, developed in concert with JR Evans Engineering.

- Provide relief and additional expertise to existing Village staff with CRS and floodplain management issues and responsibilities.
 - Review elevation certificates & plans/permits for CRS - interface with the public, conduct of flood outreach, maintain logs and required documentation.
- Be a central point of coordination and management of the Village CRS program, assuring all tasks are accomplished, documented and required submittals are made.
 - Provide CRS guidance and expertise to staff and leadership – ensure proper records and documentation in accordance with the current FEMA CRS Manual.
- Enhance the current CRS class rating and if desired and supported, accomplish the additional tasks required to improve the rating.
 - Identification of existing activities eligible for additional CRS credits – document new programs and cost-effective activities for Class 5 credit.

Position title and structure

We believe that the best course of action is to acquire part-time, on-site, contract assistance. This role could take the form of a “CRS coordinator”, as a direct report to the Community Development Director, with additional assistance from JR Evans Engineering provided, as needed.

Qualifications

Provided below are a breakdown of the desired qualifications for the individual brought in as the “CRS Coordinator.” These have been developed in concert with JR Evans Engineering.

- Coastal Florida municipal building and floodplain experience;
- Successful CRS program management of a Florida Class 6 & 5 Community;
- State Certification as a Certified Floodplain Manager (CFM); and
- Appropriate computer, presentation and customer service skills.

Next Step

JR Evans Engineering has indicated that they have a strong candidate ready to accept this role, who currently administers the CRS program for another local municipality. As such, we recommend that we enter into contract negotiations with this firm to provide part-time, onsite employment via contract at a cost of approximately \$150,000 annually.