

The reason for the FMP, in its own words is: “The purpose of this Floodplain Management Plan is to reduce or eliminate risk to people and property from flood hazards.” The FMP sets out five goals that it seeks to achieve:

1. Reduce vulnerability and exposure to flood hazards in order to protect the health, safety and welfare of residents and guests.
2. Encourage property owners, through education and outreach measures, to protect their homes and businesses from flood damage.
3. Reduce the vulnerability of critical facilities and infrastructure from the effects of flood hazards.
4. Protect natural resources by employing watershed-based approaches that balance environmental, economic and engineering considerations.
5. Minimize adverse impacts to surrounding areas and watershed functions.

While all noble goals, the implementation of the FMP via the FDPO and other related ordinances and policies are what cause risk to the development and building communities. The goals that may cause our membership the greatest problem as it is implemented are Goals 1 and 5. These goals focus on the modification of construction standards and development processes to reduce flood damage.

A closer look at the objectives set out in Goals 1 and 5 is warranted. Goal 1’s objectives are:

Objective 1.1: Maintain a database of flood problems and hazards.

Objective 1.2: Maintain a database of repetitive loss claim history and mitigation activities.

Objective 1.3: Review the Growth Management Plan, Land Development Code, and Ordinances for compatibility with these goals and objectives, and revise where appropriate and financially feasible.

Objective 1.4: Develop more comprehensive evacuation plans.

Objective 1.5: Review the adequacy of emergency procedures for flood events and coastal storm surge through training and exercises.

Objective 1.6: Update FEMA designated flood zones based on the best available technical data and analysis.

Objective 1.7: Enforce code requirements of the National Flood Insurance Program.

Objective 1.8: Conduct site investigations, research exposure and hazard data, and evaluate proposed modifications to repair and mitigate stormwater management problems.

Objective 1.9: Develop projects to reduce deficiencies within the stormwater management system as part of the AUIR.

Objectives 1.3, 1.7, 1.8 and 1.9 have potentially far reaching impacts on implementation.

Goal 5’s objectives are:

Objective 5.1: Reduce stormwater runoff through adequate stormwater management, flood control, on-site retention and best management practices to mitigate impacts associated with incremental construction and redevelopment projects.

Objective 5.2: Evaluate funding mechanisms to increase stormwater capital improvement programs.

Objective 5.3: Ensure floodplain compensation is provided as established in the Growth Management Plan and Land Development Code.

Objectives 5.1 and 5.3 also have the potential to greatly impact development costs in Collier County.

I will be providing a more extensive review of these areas as the FMP moves through the process.

The FMP uses the 2012 FEMA DFIRM maps as the guideline for all they are suggesting. While the staff and FMPC are moving to have FEMA modify those maps to reduce the amount of property, especially in Golden Gate Estates, that have been reclassified from V to AH. The reclassification to AH brings into play the SFHA classification of property which then results in a necessity under the FDPO to floodproof the property. In addition, the goal which requires that there be no adverse impacts on stormwater flow is impacted by the need to bring the property up to a higher BFE with fill.

It is suggested that CBIA work closely with staff and FEMA to press for the Physical Map Review (PMR) in the areas where property has inappropriately been moved from V to AH zones. A member who is an engineer or is familiar with the process would be valuable in assisting in this process.

Once the FMP has been adopted, it is suggested that CBIA review implementation activities with County and City of Naples and Marco Island staffs. The FMP may motivate the

There are several areas where the County has in the past interpreted the FDPO to be far more restrictive as to floodplain and stormwater issues than the Water Management District.

I would suggest that at this point CBIA reiterates the comments made in October as to the FMP. I would also suggest that the concerns as to the LiMWA properties being included in the V zones be brought to the fore.

Recommendations

I recommend that CBIA provide limited comments prior to the Planning Commission meeting scheduled for February 5, 2015. Based upon my discussions with the County coordinator of the FMP process, she indicated that they will be taking comments up until that day. The CCPC meeting will be informational for our industry as we see what the FMP is to become.