



March 1, 2013

The Honorable Randy Neugebauer, Chairman
House Subcommittee on Housing and Insurance
U.S. House of Representatives
2129 Rayburn House Office Building
Washington D.C. 20515

The Honorable Michael E. Capuano, Ranking Member
House Subcommittee on Housing and Insurance
U.S. House of Representatives
B301C Rayburn House Office Building
Washington D.C. 20515

Founding Members

Butte County, California
California Central Valley
Flood Control Association
California Farm Bureau
Colusa County, California
Colusa County Farm Bureau
California State Association
of Counties (CSAC)
Knights Landing Ridge
Drainage District
Levee District #1
Tara Brocker, Landowner
Regional Council of Rural
Counties (RCRC)
Reclamation District 108
Reclamation District 1500
Reclamation District 827
Sacramento County,
California
Sacramento River West Side
Levee District
Sacramento Valley
Landowners Association
San Joaquin County,
California
Sutter-Butte Flood Control
Agency (SFBCA)
Sutter County, California
Yolo County, California
Yolo County Farm Bureau
Yuba County, California
Yuba Sutter Farm Bureau

Re: Agricultural Floodplain Management Study

Dear Chairman Neugebauer and Ranking Member Capuano;

The Agricultural Floodplain Management Alliance (AFMA) is a coalition of local agencies, organizations, and individuals interested in protecting the long-term viability of agricultural areas and rural communities located in the regulatory floodplain. AFMA represents communities that have a significant historic cultural presence and play an integral role in the viability of agriculture locally, regionally, and nationally.

While AFMA strongly supports the mission of the Federal Emergency Management Agency and the National Flood Insurance Program (NFIP) to identify and mitigate flood risk and protect life and property in all floodplain communities, the Alliance is concerned that the current approach under the NFIP places a disproportionately impactful economic burden on agricultural areas and rural communities. The fate of these small communities has a direct bearing on the sustainability of agriculture in the regulatory floodplain as these are the communities where people gather to worship, shop, socialize, educate their children, and conduct business. The NFIP does not currently take into consideration the unique interdependency and tenuous economic balance that exists between the agriculture industry and adjacent small communities as compared to urbanized economies.

The unique characteristics of agricultural and small communities need to be recognized under the NFIP. If an urban-focused flood insurance standard continues to be applied, the existing agriculture enterprises and their dependent small communities will continue to degrade and ultimately fade away. Agriculture is currently one of the safest and most efficient uses of the floodplain. We encourage you to modify the one-size-fits-all policies that can disincentivize the continued production of agriculture in the floodplain. For example;

- Farmers and landowners in agricultural areas often have multiple structures that comprise their agricultural facilities on their property that fall under NFIP protection. However, instead of insuring them as one operation, each of the structures is required to be insured separately. The cost to individually insure each one of these structures is cost prohibitive to the average farmer and will certainly force many out of business. It is akin to having an urban homeowner pay insurance for the detached garage, each fence, each tool shed, dog house, chimney and mailbox.
- Many agriculture production buildings and structures simply cannot be effectively flood proofed to meet NFIP standards while still remaining useful,

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beneficial, and affordable to the farmer. However, many are built to withstand a flood, making their repair less expensive than existing flood-proofing options.

- The small towns and communities in agricultural areas are intimately linked to the success of local and regional agricultural economies, and therefore the national agricultural economy. The schools, libraries, post offices, emergency services, churches, and businesses in rural agricultural communities are also finding it difficult to meet NFIP standards. Without these traditional and historic support services, the rural way of life will drastically change and farmers and agricultural businesses will be without the infrastructure they need to thrive.
- As a practical matter, flood events in agricultural areas will always result in much lower damages than if the event were to occur in an urban or suburban setting.
- Many of these agricultural areas are treated as though they have no flood protection and their rates reflect that; yet these areas often have robust flood protection, even if not sufficient for 100-year accreditation.

While a narrow view of the NFIP might suggest that rates in agricultural areas should be solely based on risk, there are aspects of the NFIP that acknowledge other public policy interests. For example, an AR or A99 Zone allows new structures to be built in urban areas even though there may not yet be 100-year protection. These zones acknowledge that other interests sometimes override determinations made solely on flood risk. The same should be true for agricultural areas and rural communities in light of their importance to the nation and their lower residual risk and loss potential compared to urban areas. AFMA believes that the creation of a new zone under the NFIP that addresses the unique circumstances in agricultural areas and rural communities could help address some of the challenges farmers and rural communities are currently facing and will continue to face in the future while maintaining the intent and financial integrity of the NFIP.

To help better understand the impact of floodplain management practices in agricultural areas and rural communities, Congressman John Garamendi and Senator Dianne Feinstein have co-sponsored a request for the U.S. Government Accountability Office (GAO) to conduct the Agricultural Floodplain Management Study. The study will evaluate the challenges of agricultural areas and rural communities surviving in the NFIP floodplain and research the creation of a new zone under the NFIP specifically related to agricultural areas and rural communities. Most importantly to AFMA, the study will be conducted in direct participation and cooperation with local landowners, community leaders, and industry representatives from impacted agricultural and rural areas. A copy of the request to the GAO is enclosed with this letter.

On behalf of AFMA and our members, I request your support of the Agricultural Floodplain Management Study and strongly urge you to sign on to the GAO request letter sponsored by Congressman Garamendi and Senator Feinstein. If you have any questions, please do not hesitate to contact Elizabeth Shelton (Elizabeth.Shelton@mail.house.gov) with Congressman Garamendi or Devin Rhinerson (Devin.Rhinerson@feinstein.senate.gov) with Senator Feinstein. I can also be reached at Kristi.More@afmalliance.com or by phone at (202) 454-3933. Thank you for your consideration.

Sincerely,



Kristi More
Federal Director

Enclosures: December 5, 2012 Request Letter to GAO
CC: Congressman John Garamendi
Senator Dianne Feinstein