

APPENDIX D: REPETITIVE LOSS REPORT

State of Wisconsin Repetitive Loss Report

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EXECUTIVE SUMMARY

FEMA Region V provided the Wisconsin Emergency Management (WEM) with an updated copy of the August 2010 Federal Emergency Management Agency (FEMA) Repetitive Loss Database for Wisconsin. During the federal disaster declaration FEMA-1933-DR-WI, FEMA hazard mitigation staff conducted field inspections in 16 Counties to produce the most accurate depiction of the current status of repetitive loss properties in Wisconsin.

The State of Wisconsin Repetitive Loss Report was developed to serve as a written summary of the communities with repetitively flooded properties and to use as an attachment to the Wisconsin State Hazard Mitigation Plan. Sixteen communities with a repetitive loss property were visited and visual inspections were performed at each property indicated as a repetitive loss property in the most current database. In addition, the repetitive loss information collected during 1768-DR-WI was reviewed and included in this report. The database findings include a brief discussion of the 579 repetitive loss properties, the repetitive loss communities and the success of the mitigation projects through the Hazard Mitigation Grant Program (HMGP), the Flood Mitigation Assistance (FMA) program, the Pre-disaster Mitigation Program (PDM) and other state and local hazard mitigation efforts.

The August 2010 database showed that 65 of the repetitive loss properties (11.23%) have been removed or protected from the threat of flooding by acquisition, elevation, floodproofing, levees or other structural measures. After staff conducted field inspections it was determined that there are now 112 (19.34%) properties that have been mitigated. Of these 112 properties, 83 (14.34% of all RLP) were acquired, 24 (4.14% of all RLP) were floodproofed, and 5 (0.86%) are in the process of being removed or floodproofed. There are 467 properties (80.66%) that remain floodprone and 97 NFIP communities with repetitive loss properties. Staff was not able to visit every repetitive loss property and as a result, there are 55 properties (9.50%) with no picture or latitude/longitude information. Of these 55, 14 (2.42%) were listed as mitigated in the national database, via information obtained from the work done during DR-1768-WI, or from correspondence with the State Hazard Mitigation Officer. Since those properties were included on the list, they were considered as part of the NFIP communities, and the 41 that were not indicated as mitigated were assumed to still be floodprone.

Acquisition was the most common choice of mitigation by the majority of communities. The success of acquisitions is most evident in communities with widespread damage such as Kenosha County, the City of Wauwatosa and the Village of Brown Deer. In these communities acquisitions eliminated a majority of the repetitive loss properties and reduced the risk of future loss. The implementation summary states the updated database will be a resource for the state in prioritizing future mitigation projects. Per the State of Wisconsin Hazard Mitigation Plan, mitigating repetitive loss properties and severe repetitive loss properties is the second highest priority behind acquisition and demolition of substantially damaged properties.

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ACRONYMS

FEMA	Federal Emergency Management Agency
FIA	Federal Insurance Administration
FMA	Flood Mitigation Assistance Program
HMGP	Hazard Mitigation Grant Program
NFIP	National Flood Insurance Program
PDM	Pre-Disaster Mitigation Program
PIN	Parcel Identification Number
RFC	Repetitive Flood Claims Program
RLP	Repetitive Loss Property
RLR	Repetitive Loss Report
SRL	Severe Repetitive Loss Property
WEM	Wisconsin Emergency Management

I. INTRODUCTION

A. Purpose

The Wisconsin Hazard Mitigation Repetitive Loss Report, referred to as the Repetitive Loss Report (RLR), is intended to serve as an attachment to the State of Wisconsin Hazard Mitigation Plan. The RLR provides information, by community, on the status of repetitive loss properties in Wisconsin. The report can be used as a floodplain management tool and to provide information to communities for flood mitigation grants administered by WEM.

B. Framework

FEMA, through the Federal Insurance Administration (FIA), collects data on each property in the United States when a flood insurance claim is made. When more than one flood insurance claim of at least \$1,000 is made within a ten-year period, the property is classified as a repetitive loss property. Information on these repetitive loss properties is collected for each state and compiled in the FEMA repetitive loss database. However, the information collected by FIA is not standardized and has errors that require correction through the methodology described in Section II.

C. Intent

Under federal disaster declaration FEMA-1933-DR-WI, staff was provided by FEMA to update the existing FEMA repetitive loss database with accurate information on each of the 579 properties listed and to assist the state in identifying those communities that warrant implementation of mitigation measures. The updated repetitive loss database is the source of information for this report. The RLR can serve as a statewide plan for addressing repetitive loss properties. Identifying communities, which have the highest repetitive loss, allows WEM to rank the repetitive loss properties and make conclusive funding decisions for mitigation projects. The success of these projects reduces the financial strain placed on local, state and federal resources by eliminating future flood losses.

II. METHODOLOGY

A. Organization

The methodology used for data collection consisted of conducting site visits to as many properties in the database as possible. At each property, staff took a picture and recorded the latitude and longitude. During 1933-DR-WI, staff visited 16 counties where no previous information had been collected and verified information in another 5 counties. The information collected during these site visits was input into a data sheet format that the State has been using to record information about properties within the repetitive loss database.

B. Data Collection

Data collection was accomplished by physically visiting each property and by reviewing information previously collected during 1768-DR-WI. The following information was recorded and stored in an excel worksheet for each property: County, Community

Name, Repetitive Loss Number, Community Number, Address, Latitude, Longitude, Description, Comments, and AW-501 Actions Needed.

III. DATA COLLECTION FINDINGS

A. Number of Repetitive Loss Properties and Duplicate Properties

The hard copy of the FEMA database used in this report was printed in August 2010 and identified 579 repetitive loss properties statewide in Wisconsin.

B. Repetitive Loss Property Building Status

The Wisconsin database identified that 65 (11.22%) of the 579 statewide repetitive loss properties have been mitigated, whether by removal or elevation. Based on the inspections and reviews of previous work, there are an additional 47 properties that have been mitigated, whether by removal or elevation. Therefore, 112 repetitive loss properties (19.34%) are not or will no longer be vulnerable to flooding by the end of 2010. Generally, acquisition is preferred over floodproofing because acquisition completely removes structures from the floodplain, eliminating flood risk to the property and its owners and eliminates the need for emergency response activities. Floodproofing reduces the risk to repetitive loss structures while allowing the structures to stay in place. This alternative is preferable in some circumstances involving historical or cultural reasons, but is only possible if the property is protected above the 100-year flood elevation.

Table 1. Repetitive Loss Property Building Status

Building Status Description	Number of Properties	Percent of Total
Bought Out (acquired)/Demolished	83	14.33%
Elevated or Floodproofed	24	4.15%
In Progress	5	0.86%
Floodprone	467	80.66%
Total	579	100.00%

There are 467 (80.66%) repetitive loss properties where flood mitigation has not taken place. These properties are presumed to remain floodprone.

There are 41 (7.08%) properties that were not physically visited and did not have any previous information associated with them. This was usually due to incomplete or inadequate addresses and owner's names that were two or more decades old. These two factors made it virtually impossible for staff to locate them.

C. Repetitive Loss Communities

The Wisconsin database identifies 97 communities with repetitive loss properties.

The updated list of communities with repetitive loss properties yields the following data. Most communities with repetitive loss properties in Wisconsin have five or less repetitive

loss properties, as displayed in Table 3. The ten communities with the most repetitive loss properties and the status of those properties are described in Table 4.

Table 2. Repetitive Loss Communities
Grouped by Number of Repetitive Loss Properties

Number of Repetitive Loss Properties	Number of Communities	Percent of Communities
1-5	82	84.54%
6-10	6	6.19%
11-20	5	5.15%
21-50	3	3.09%
51+	1	1.03%
Total	97	100.00%

Table 3. Top Ten Communities
with Highest Number of Repetitive Loss Properties (RLP)

Rank	Community Name	Total RLP	Acquired/ Demolished/ Mitigated	Elevated	Floodprone	Not Field Verified
1	Milwaukee, City	220	8		211	1
2	Jefferson County	36	10	6	16	4
3	Kenosha County	31	10		21	
4	Wauwatosa, City of	23	20		3	5
5	Gays Mills, Village of	20	3	4	13	
6	Mequon, City of	12		1	11	
7	Thiensville, Village of	11			11	
8	Darlington, City of	11	9		1	
9	Brookfield, City of	11	2		9	
10	Pierce County	10	2		4	4

D. Success of Post-Disaster Acquisitions

After the Midwest Flood of 1993 (FEMA-DR-994-WI), the HMGP had new resolve to address repetitive flood losses and unprecedented funding to accomplish the task. Although some acquisitions were planned prior to 1993, the size of the 1993 disaster guided future acquisition projects by refining Wisconsin's implementation policies and procedures for acquisition grants, specifically the HMGP. The success of the post-1993 acquisitions can be seen by an impressive reduction in repetitive losses.

Table 4. Success of Acquisition in Reducing Repetitive Losses

Community	Repetitive Loss Properties (RLP)	Number & (%) of Local RLP Acquired	Number of RLP Remaining	Flood Risk of RLP Remaining	
				Mitigated or in Process	Flood Prone
Brown Deer, Village	9	8 (88.88%)	1	0	1
Kenosha County	31	10 (32.26%)	21	0	21
Wauwatosa, City	21	7 (33.3%)	14	11	3
Darlington, City	11	9 (81.8%)	2	0	2

The Village of Brown Deer and Kenosha County are two communities where acquisition projects have eliminated the majority of local repetitive loss properties. The Village of Brown Deer acquired 88.88 percent of its repetitive loss properties while Kenosha County acquired 32.26 percent. The City of Wauwatosa and the City of Darlington are two communities that have embraced flood mitigation through floodproofing as well as acquisition.

IV. IMPLEMENTATION SUMMARY

A. Funding Sources

The primary source of mitigation funds is the Section 404 Hazard Mitigation Grant Program (HMGP). The HMGP can provide local communities 87.5 percent (75 percent federal, 12.5 percent state) of the funds to implement immediate and long-term hazard mitigation measures following a federal disaster declaration. Communities must provide a non-Federal match of 12.5 percent either through a state agency or through a local funding source. HMGP projects are scored and selected by WEM on a variety of criteria that favor permanent and cost effective mitigation of flood damaged structures. Repetitive loss structures are excellent candidates and are a high priority for mitigation with HMGP funds.

Another source of flood mitigation funds is the Flood Mitigation Assistance (FMA) program. FMA is state-administered through WEM and is a cost-share program (75% federal, 25% local match) through which states and communities can receive grants for flood mitigation planning, technical assistance and mitigation projects. The overall goal of the FMA is to fund cost-effective measures that reduce or eliminate the long-term risk of flood damage to buildings, manufactured homes and other NIFP-insured structures. Other goals are to: Reduce the number of repetitively or substantially damaged structures and the associated claims on the NFIP; Encourage long-term, comprehensive mitigation planning; Respond to the needs of communities participating in the NFIP; and Complement other federal and state mitigation programs with similar

goals. There are three requirements to receive mitigation project funds under FMA. Local communities need to develop an All Hazards Mitigation Plan that identifies those structures that are vulnerable to flood damage, establish mitigation priorities and include an action plan to reduce flood vulnerability. Structures with repetitive losses are likely to be highly vulnerable. A successful hazard mitigation plan will identify any repetitive loss properties and will show how the community plans to mitigate those properties. The State receives an annual allocation based on the number of flood insurance policies and the number of repetitive loss properties in the State. Anything above the allocation is based on a national competition.

The Repetitive Floods Claims (RFC) Program provides funds to mitigate NFIP-insured residential or commercial properties that have received one or more NFIP paid insurance claim. An application may be submitted for RFC funding if neither the applicant nor the subapplicant can currently meet the FMA non-federal share requirement. For this program, the federal share may be up to 100 percent of the project cost. The application and the subapplication must include a certification (e.g., signed letter from an authorized local government official) explaining why the FMA cost-sharing requirement cannot be met. RFC grants are available on a nationally competitive basis.

The Bunning-Bereuter-Blumenauer Flood Insurance Reform Act of 2004 was signed into law on June 30, 2004. The Act includes measures to address those properties that result in a disproportionate amount of claims on to the NFIP. The Act created a program for mitigation of severe repetitive loss properties. "Severe repetitive loss properties" are defined as a NFIP-insured residential property that meet one of two triggers: four or more claims over \$5,000 (including building and contents) each, and the cumulative amount of such claims payments exceed \$20,000; or at least two claims with cumulative amount exceeding the value of the building. For both, at least two of the claims must have occurred within any ten-year period and must be greater than ten days apart. Grants under the program the non-federal match is 25%, however, if the state's approved State Hazard Mitigation Plan includes a strategy to reduce the number of repetitive loss and severe repetitive loss properties, than the non-federal share is reduced to 10%. Wisconsin's plan includes such a strategy. If the owner of a severe repetitive loss property refuses an offer made under the program, the flood insurance premium will increase to 150%. At no time can the premium be more than the actuarial rate. Any eligible mitigation proposal for properties that fit this criteria in Wisconsin would be an extremely high priority for mitigation funding at WEM. FEMA has identified eleven potential SRL properties in Wisconsin. Four of the properties identified have been "validated" by FEMA as a SRL property. One of the four properties has been recently included in a HMGP application. Two properties are "validated uninsured." One of those properties has been mitigated through HMGP. Five of the properties are "pending uninsured." Of those five, two have been mitigated again through HMGP, and one of the properties cannot be located due to insufficient data. That brings the number of potential SRL properties down to six statewide.

Table 5. Severe Repetitive Loss Communities

Community	Severe Repetitive Loss Properties	Comment
Crawford County	1	Cannot be located due to insufficient data
Jefferson County	1	Mitigated
Kenosha County	1	Has been included in a pending HMGP application
Milwaukee, City of	3	1 validated uninsured; 2 pending uninsured
Prescott, City of	1	Validated
Trempealeau County	1	Mitigated
Washington County	2	Validated; no hazard mitigation plan
Wauwatosa, City of	1	Mitigated
Total	11	

The Pre-Disaster Mitigation Program (PDM) is another source of mitigation funds. PDM's main objective is to reduce overall risk to the population and structures, while also reducing reliance on funding from actual disaster declarations. The State administers the program through the National Pre-Disaster Mitigation fund, which is allocated yearly from Congress. Grants are awarded on a nationally competitive basis. An approved Standard State Mitigation Plan is required for the State to remain eligible for to receive the money and local governments applying to the program must have an approved all-hazard mitigation plan. All flood projects funded through PDM must be located physically in a participating NFIP community and the 75% Federal/ 25% Local cost share still applies.

The significant difference between HMGP and the other four mitigation programs (FMA, RFC, SRL and PDM) are that they are not tied to a federal disaster declaration. The other four mitigation programs are available annually on a national competitive basis. The state does receive a small allocation for FMA, but anything above that allocation is on a nationally competitive basis. FMA, RFC, and SRL funding is limited to only flood mitigation for NFIP-insured structures. The three programs along with PDM are also generally smaller in magnitude compared to the HMGP funding. As a result, the four non-disaster mitigation programs are often used to supplement HMGP projects.

B. Mitigation Recommendations and Projects

The Plan of Action provides the state with a resource to identify the properties with the most repetitive losses and to prioritize specific mitigation recommendations for those properties. The state utilizes the Repetitive Loss Report statistics from past and current mitigation projects to provide guidance for future mitigation projects and reduce flood losses. Repetitive loss information is a consideration of the funding criteria for future mitigation projects. When a community submits an application for mitigation funding, the state refers to the Repetitive Loss Report to determine if the repetitive loss properties are identified on the application. If they are not identified and the properties fit within the

original scope of the project, the state should recommend that the repetitive loss properties become part of the project. RLP information is also provided to local governments to address and include in development of Flood and/or All-Hazard Mitigation Plans.

C. Standardized Information

Since some of the repetitive loss properties were unidentified due to poor location information, it is suggested that FEMA standardize their method of data collection for the repetitive loss properties. The consistent use of PINs on the flood insurance application would be one method of such standardization.

D. Updates

The Repetitive Loss Report will remain an addendum to the State of Wisconsin Hazard Mitigation Plan. Updates of the Repetitive Loss Report will be accomplished every year or two as new claim information is available from the NFIP and as remaining repetitive loss properties are mitigated through state programs.

ATTACHMENT A

Table 6. List of Communities with Repetitive Loss Properties

NFIP Community	CID#	Total	Acquired	Floodproofed	In Process	Remaining
ALMA, CITY OF	555540	1				1
BAYSIDE, VILLAGE OF	550270	2				2
BERLIN, CITY OF	550166	5				5
BLACK EARTH, VILLAGE OF	550079	1				1
BLAIR, CITY OF	550440	2				2
BROOKFIELD, CITY OF	550478	11	2			9
BROWN COUNTY	550020	1				1
BROWN DEER, VILLAGE OF	550271	9	8			1
BUTLER, VILLAGE OF	550536	2		2		0
CHASEBURG, VILLAGE OF	550451	1	1			0
CHIPPEWA FALLS, CITY OF	550044	2	2			1
CLARK COUNTY	550048	1	1			0
COLUMBIA COUNTY	550581	3				3
CRAWFORD COUNTY	555551	2		1		1
DANE COUNTY	550077	5		1		4
DARLINGTON, CITY OF	550228	11	3	6		2
DELAFIELD, CITY OF	550479	1				1
DOOR COUNTY	550109	1	1			0
DUNN COUNTY	550118	1				1
DURAND, CITY OF	550320	2				2
EAU CLAIRE, CITY OF	550128	1				1
ELM GROVE, VILLAGE OF	550578	2	1			1
FOND DU LAC COUNTY	550131	2				2
FOND DU LAC, CITY OF	550136	2	1			1
FORT ATKINSON, CITY OF	555554	2				2
FOUNTAIN CITY, CITY OF	555555	1				1
GAYS MILLS, VILLAGE OF	550071	20		4	3	13
GLENDALE, CITY OF	550275	9				9
GRANT COUNTY	555557	4	2			2
HILLSBORO, CITY OF	550455	2	1			1
HOWARD, VILLAGE OF	550023	2				2
JANESVILLE, CITY OF	555560	3				3
JEFFERSON COUNTY	550191	36	10	6		20
JEFFERSON, CITY OF	555561	1				1
KENOSHA COUNTY	550523	31	10			21
KENOSHA, CITY OF	550209	1	1			0
LA CROSSE COUNTY	550217	6				6

State of Wisconsin Hazard Mitigation Plan

NFIP Community	CID#	Total	Acquired	Floodproofed	In Process	Remaining
LA FARGE, VILLAGE OF	550456	2	1			1
LAFAYETTE COUNTY	550223	1				1
LOYAL, CITY OF	550052	1				1
MADISON, CITY OF	550083	1				1
MARATHON CITY, VILLAGE OF	550252	1				1
MARATHON COUNTY	550245	1				1
MARQUETTE COUNTY	550601	2				2
MAZOMANIE, VILLAGE OF	550085	1				1
MEQUON, CITY OF	555564	12			1	11
MILWAUKEE, CITY OF	550278	220	8			211
MONONA, CITY OF	550088	2				2
MONTELLO, CITY OF	550266	1				1
MONTICELLO, VILLAGE OF	550163	1				1
MUSKEGO, CITY OF	550486	1				1
NEILLSVILLE, CITY OF	550053	2				2
NEW BERLIN, CITY OF	550487	3	1			2
NORTH FOND DU LAC, VILLAGE OF	550138	1				1
OAK CREEK, CITY OF	550279	1	1			0
OCONTO COUNTY	550294	2				2
OCONTO, CITY OF	550297	2	2			0
OREGON, VILLAGE OF	550089	3	2	1		0
OSHKOSH, CITY OF	550511	3		1		2
OZAUKEE COUNTY	550310	1				1
PEPIN COUNTY	555570	6				6
PIERCE COUNTY	555571	10	2			8
PORT WASHINGTON, CITY OF	550316	1				1
PORTAGE, CITY OF	550063	2				2
PRAIRIE DU CHIEN, CITY OF	555573	3		2		1
PRESCOTT, CITY OF	555574	5				5
PRINCETON, CITY OF	550171	1				1
RACINE COUNTY	550347	2				2
RACINE, CITY OF	555575	2				2
REEDSBURG, CITY OF	550402	2				2
RICHLAND CENTER, CITY OF	555576	2				2
RICHLAND COUNTY	550356	3				3
RIPON, CITY OF	550140	1				1
RIVER HILLS, VILLAGE OF	550280	2				2
ROCK COUNTY	550363	4				4
ROCK SPRINGS, VILLAGE OF	550403	1				1

State of Wisconsin Hazard Mitigation Plan

NFIP Community	CID#	Total	Acquired	Floodproofed	In Process	Remaining
RUSK COUNTY	550602	2				2
SAUK COUNTY	550391	2				2
SHEBOYGAN, CITY OF	550430	1				1
SILVER LAKE, VILLAGE OF	550210	4				4
SOLDIERS GROVE, VILLAGE OF	550074	3				3
ST. CROIX COUNTY	555578	2				2
STEBEN, VILLAGE OF	555580	3				3
STURGEON BAY, CITY OF	550111	1				1
THIENSVILLE, VILLAGE OF	550318	11				11
TOMAH, CITY OF	550291	2				2
TREMPEALEAU COUNTY	555585	5	1			4
TREMPEALEAU, VILLAGE OF	555584	1				1
VERNON COUNTY	550450	3				3
VIOLA, VILLAGE OF	550460	1				1
WASHBURN COUNTY	550606	1				1
WASHINGTON COUNTY	550471	4				4
WAUKESHA COUNTY	550476	4				4
WAUKESHA, CITY OF	550491	2			1	1
WAUSAU, CITY OF	550258	1	1			0
WAUWATOSA, CITY OF	550284	23	20			3
WEST ALLIS, CITY OF	550285	2				2
Total		579	83	24	5	467
Percent			14.34%	4.14%	0.86%	80.66%