



Agenda Report

21-543

Agenda Date: 7/6/2021

REPORT TO COUNCIL

SUBJECT

Approval of the 2021 Santa Clara County Multi-Jurisdictional Program for Public Information; a program under the Community Rating System of the Federal Emergency Management Agency's National Flood Insurance Program

COUNCIL PILLAR

Deliver and Enhance High Quality Efficient Services and Infrastructure

BACKGROUND

The Federal Emergency Management Agency (FEMA) requires the elected body of each community who participates in the National Flood Insurance Program's (NFIP) Community Rating System (CRS) to approve a Multi-Jurisdictional Program for Public Information (PPI) (5-Year Plan) in order to receive points under the CRS program. CRS is a voluntary program under the NFIP that allows communities to earn flood insurance premium discounts for their residents and businesses. Communities earn CRS points for activities that promote flood risk reduction practices, including implementation of outreach activities under the PPI. Communities are assigned class ratings based on the points earned. CRS Class ratings are assigned at 500-point increments and each improvement in class rating nets an additional 5 percent discount for property owners who pay flood insurance premiums in participating communities. Since Valley Water is not a land-use agency, the points they earn as a "fictitious community" (a special FEMA designation) provide a foundation for communities to build upon. FEMA approved this unique arrangement in 1998. Based on calculations from November 2020, the total savings for City of Santa Clara residents and businesses from CRS discounts is approximately \$90,000 a year with the current classification of Class 7. Total savings for Santa Clara County residents from CRS discounts is approximately \$2.37 million a year.

The PPI was introduced into Santa Clara County's CRS program in 2013 and participation is voluntary. As part of the PPI process, local communities work together to decide which flood risk reduction messages are the most appropriate and design a program to deliver those messages. The number of points earned as a result of having an approved PPI will vary depending on how extensive the program implemented is within each participating community's jurisdiction. Santa Clara Valley Water District (Valley Water) staff estimates that the 2021 Santa Clara County PPI (Attachment 1) being recommended will earn in the range of 80-200 points for each participating community within Valley Water's CRS User Group. These points contribute to discounts on flood insurance for the participating communities' constituents.

CRS communities must reconvene each year to evaluate whether the flood risk reduction messages are still appropriate and adjust the PPI if needed, while a complete update to the PPI must occur every five years. Additionally, a report must be submitted to FEMA annually and shared with each participating community governing body describing the PPI implementation and the report. On April

14, 2015, Valley Water's Board adopted the original 2015 Santa Clara County PPI 5-Year Plan. City of Santa Clara City Council approved the original 2015 PPI Plan on July 14, 2015.

In February 2020, Valley Water hosted the start of the five-year PPI process, in which 15 communities worked together to review and update the 2015 PPI Plan. These communities included the current 11 participating CRS communities (the Cities of Cupertino, Gilroy, Los Altos, Milpitas, Morgan Hill, Mountain View, Palo Alto, San Jose, Santa Clara, Sunnyvale, and Valley Water) and four communities that were interested in applying to become a CRS community (the Town of Los Gatos, the Town of Los Altos Hills, the City of Saratoga, and the County of Santa Clara). Staff and external stakeholders from each of the communities participated in drafting the revised PPI document. Due to the COVID-19 pandemic, many communities had to shift priorities to respond to the public health crisis; therefore, FEMA provided an extension for completing the PPI to early 2021. Valley Water reconvened the participating communities and stakeholders in October 2020 to begin developing the new 5-year PPI for Santa Clara County.

The PPI must be developed by a committee comprised of both staff and non-governmental representatives from each of the participating communities, known as the PPI Committee. The variety of participants ensures that unique perspectives and suggestions are considered that enhance the outreach plan. In addition to FEMA's standard messages, two other important messages were identified for Santa Clara County. The first was encouraging residents and workers to make a personal family emergency plan. The second was urging drivers to slow down on wet roads and avoid driving through ponded water to reduce traffic accidents.

The draft PPI was reviewed by FEMA to ensure its provisions fully comply with FEMA requirements prior to approval by any participating agency's government body.

Valley Water approved the 2021 PPI 5-Year Plan on April 27, 2021 and provided the final approved 5-Year Plan to all the participating CRS communities, including the City of Santa Clara to present to City Council for approval and implementation.

DISCUSSION

As part of the PPI Plan, during the five-year cycle the City must be visited by a CRS specialist to evaluate and audit the City's creditable flood risk reduction activities in order to determine the CRS class rating. Following the last CRS specialist visit in 2018, the City earned the maximum points achievable under the 2015 PPI 5-Year Plan, which contributed to the City's CRS class rating improving from Class 8 to Class 7 in 2019. Through this improvement the flood insurance discount for City of Santa Clara residents increased from 10 percent to 15 percent. Staff anticipates earning the maximum points available under the 2021 PPI 5-Year Plan at the next five-year cycle visit, which will help the City to maintain its Class 7 rating and provide the same flood insurance premium discount that Santa Clara residents and businesses currently enjoy.

One major difference between the 2015 and the 2021 PPI 5-Year Plan is the inclusion of a Flood Response Program (FRP). In 2018 Public Works staff lead the effort with staff from the Office of Emergency Services and the City's Communication Department to create the City's first FRP that provides a road map for City staff in various departments to quickly distribute prescribed messages through several social media outlets before, during, and after a storm event. This 2018 FRP was not part of the original 2015 PPI. In 2019, after the City received the maximum available CRS points under the 2015 PPI 5-Year Plan, staff shared the FRP with other communities in Santa Clara County and Valley Water, who expressed a high level of interest in adopting the City's FRP model. The 2021

PPI 5-Year Plan includes an enhanced FRP for all communities in Santa Clara County to implement.

As stated previously, FEMA requires the elected body of each community who participates in the NFIP's CRS to approve a Multi-Jurisdictional Program for Public Information (PPI) 5-Year Plan in order to receive PPI points under the CRS program. Council approval of the 2021 PPI Plan is necessary for the City to retain its CRS Class 7 rating and to receive the subsequent flood insurance premium discounts for Santa Clara residents and businesses. Without the PPI points, the City would be downgraded to CRS Class 8 rating, and Santa Clara residents and businesses would receive less flood insurance premium discounts.

ENVIRONMENTAL REVIEW

The recommendation action does not constitute a project under CEQA because it does not have the potential for resulting in direct or reasonably foreseeable indirect physical change in the environment.

FISCAL IMPACT

There is no financial impact associated with this item.

COORDINATION

This report has been coordinated with the City Attorney's Office.

PUBLIC CONTACT

Public contact was made by posting the Council agenda on the City's official-notice bulletin board outside City Hall Council Chambers. A complete agenda packet is available on the City's website and in the City Clerk's Office at least 72 hours prior to a Regular Meeting and 24 hours prior to a Special Meeting. A hard copy of any agenda report may be requested by contacting the City Clerk's Office at (408) 615-2220, email clerk@santaclaraca.gov <<mailto:clerk@santaclaraca.gov>> or at the public information desk at any City of Santa Clara public library.

RECOMMENDATION

Approve the implementation of the 2021 Santa Clara County Multi-Jurisdictional Program for Public Information 5-Year Plan for the Community Rating System Program.

Reviewed by: Craig Mobeck, Director of Public Works

Approved by: Deanna J. Santana, City Manager

ATTACHMENTS

1. 2021 Santa Clara County Multi-Jurisdictional PPI
2. PPI Appendix A
3. PPI Appendix D