

Frequently Asked Questions about Flood Zones and the New Flood Maps - Updated February 7, 2014 -

Q. What changes are happening with flood zones and flood maps in Bourne?

A. Two changes:

- 1) New **flood maps**, scheduled by FEMA to become effective on July 16th. See pages 4 through 10.
- 2) A new **federal law**, “Biggert-Waters,” in effect since July 2012, that is **raising flood insurance rates** drastically. It may be modified by pending federal legislation that is intended to delay the rate changes (but since the mandated rate changes have already begun, would at best be a rollback not a delay). See pages 11 through 15.

Q. What latest developments should I be aware of? What about the bills pending in Congress that would “reform” the Biggert-Waters Flood Insurance Reform Act of 2012?

A. Several bills have been introduced that might soften some of the effects of Biggert-Waters. The most comprehensive bill is the **Homeowner Flood Insurance Affordability** bill which passed the US Senate on Jan. 30. Identical versions of this bill were introduced on October 2013 in both houses, with wide bipartisan support and talk of swift passage. Co-sponsors include both of our Senators, Elizabeth Warren and Ed Markey, also Sen. Waters of the original Biggert-Waters law, and many representatives including our Bill Keating. But support in the House has weakened since October, and the bill’s fate there is dubious. Meanwhile the House passed a much weaker proposal, the **Flood Insurance Relief and Transparency** bill, on Jan. 15. We don’t know if any of these measures will take effect. See more on these and other efforts to soften Biggert-Waters on pages 13-15.

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General Questions:

Q. What is a flood zone?

A. A flood zone is an area designated by FEMA for its degree of flood risk. There is some risk of flooding everywhere; no area is considered zero risk, and nationwide about 20% of flood damage occurs in the lowest-risk flood zone, known here as the X zone. However many people use the term flood zone loosely to mean a **high-risk** flood zone--A, AE or VE zones--which are collectively known as Special Flood Hazard Areas (SFHA). Homes and buildings in high-risk flood zones, and with mortgages from federally regulated or insured lenders, are required to carry flood insurance. High-risk flood zones have a 1% or greater chance of flooding in any given year, which is equivalent to a 26% chance of flooding over the life of a 30-year mortgage.

Q. Who is mandated (required) to carry flood insurance?

A. Owners of structures in a high hazard flood zone (AE or VE), who have a federally insured or federally regulated mortgage or reverse mortgage, are mandated by FEMA to carry flood insurance. It is our understanding that lenders can also require flood insurance even outside of those high hazard zones, at their discretion, at lower rates.

Q. Can I just wait to hear if I have to get flood insurance, or if my risk rate has changed?

A. Yes, you can. However, it may be to your advantage to know in advance how the new maps and the new law will affect you. In some circumstances there may be steps you can take in advance to reduce the cost. And although the ultimate height that rates will rise from the new law(s) is not certain, you would be well advised to learn as much as you can about them.

Q. My mortgage holder or insurance agent tells me that my property has been re-mapped up to a higher risk zone by "recent revisions." What is going on and what should I do?

A. We heard this from many property owners throughout 2013, and were bewildered for awhile because **the most recent flood map revision currently in effect is dated August 9, 1999**. Until the new revisions are finalized and become effective (projected for July 16, 2014), the 1999 maps (and most LOMRs and LOMAs) are still in effect.

The revisions referred to may be, not map revisions (of which none have yet gone into effect), but changes made by the Biggert-Waters Flood Insurance Reform Act of 2012, many of whose provisions have already been going into effect. See the section on Biggert-Waters on page 11.

On the other hand, some long-time homeowners have told us that they have received renewal quotes for their flood insurance that are much higher than previously, and that new flood maps are being cited as the reason for the change. We are dismayed to hear this, because the new maps are not scheduled to go into effect until July 16. And it is conceivable that something could still delay the effective date of the County-wide maps. Remapping-based rate hikes that would start before the new maps become effective seem to us highly improper.

As to what you should do, we recommend that you be guided by the next Q and A below.

Q. What should I do if my lender contacts me and tells me they have determined that I have been at higher risk than I have been insured for (not as the result of a flood map revision), and directs me to get insurance based on the higher risk determination?

- A. According to a flood-insurance-savvy insurance consultant:
- 1) You should contact them promptly and ask is it OK to wait to make that change when you renew the policy.
 - 2) If they say no, that you must get new coverage at the higher rate before the renewal date, then you should comply, because:
 - 3) If you delay, and ignore the lender while you contact FEMA to try to resolve the issue through FEMA review/letter of map amendment (LOMA) etc., or while you submit additional documentation for the lender to submit to their flood-determination vendor for a redetermination, the lender can meanwhile “force-place” you into private flood insurance instead of the NFIP, often at a cost higher than federal flood insurance. And if grandfathering does survive Biggert-Waters for awhile, you might lose your grandfathering if you exit federal flood insurance.

Q. Is a Reverse Mortgage included under “federally regulated or insured mortgage,” in terms of mandating flood insurance coverage?

- A. Yes. If you are in a flood hazard zone (AE or VE), and currently do not carry a mortgage so have not been forced to carry flood insurance on your house, you need to be aware that taking out a federally regulated or insured reverse mortgage will bring with it the requirement of carrying flood insurance.

Q. I do not have flood insurance, and I have no federally regulated or insured mortgage or reverse mortgage. If I am re-mapped up to a higher risk zone, will I be forced to get flood insurance even if I do not want to?

- A. No, to the best of our knowledge, under those circumstances no one will force you to get flood insurance. If you have no mortgage, you can decide freely whether or not to get flood insurance. You can decide for yourself the level of flood risk you can live with. Keep in mind that **over 30 years**, the risk of experiencing the flooding calculated by FEMA’s models (1% annual risk) is **26%**.

You should also be aware that if you ever do sustain flood damage, federal disaster assistance may be unavailable to you, or less available to you, because of not carrying flood insurance.

We have heard rumors that homeowners insurance carriers may be requiring flood insurance as a condition of homeowners insurance coverage, but we have not been able to corroborate this.

Q. I am not in an AE or VE flood zone, but I want to get flood insurance because I am worried about possible water damage not covered under my homeowners policy; or because I am near enough to a high risk flood zone that I worry about a catastrophic flood that could spill over the lines drawn on the map. Can I get flood insurance? What would it cost?

- A. Yes, absolutely, you can get flood insurance, and it will cost substantially less than in an AE or VE zone, at the X zone risk rate.

New Flood Maps:

Q. When will the new FEMA flood maps become effective?

A. July 16, 2014 barring unforeseen delays. We received Preliminary new flood zone maps in May 2013. A 90-day appeals period followed, which was renewed, with a final deadline for appeals of Oct. 17, 2013. Town Meeting must adopt the new maps this spring. Then, barring any last-minute delays (which would be county-wide) the maps will become effective on **July 16, 2014**. (In the event of such a delay, the effective date would probably be June or July 2015.)

Q. What do the new flood maps look like?

A. In format, the new Preliminary maps look very much like the Preliminary maps that were issued in 2009 and 2011 (and never took effect).

FEMA tells us that the digital images of the final maps will be in a different format from the .pdf images of the Preliminary maps currently posted on the Town website, and will be able to be zoomed in on at a finer resolution than is possible with the .pdf's.

If you have difficulty reading the paper or .pdf Preliminary maps, we will be happy to look at the same data on our GIS system, which is much easier to read. Contact Dody Adkins-Perry in the Engineering and Planning departments, 508-759-0615 ext "#345;"

dadkins-perry@townofbourne.com , or come to the Engineering or Planning window at Town Hall, second floor.

Q. Where can I see the new flood maps?

A. Preliminary maps on paper are available to be viewed in the Engineering Department at Town Hall, second floor.

Pdf versions of the new maps are posted separately on the Town website: <http://www.townofbourne.com/Departments/Regulatory/PlanningDepartment/tabid/177/Default.aspx>. Note: You must choose your map sheet by number. You will find an improved Index Map at the bottom of the list of maps.

The maps are also available on an interactive GIS site:

<http://climate.buzzardsbay.org/firm-review.html>

and on the FEMA website:

<http://www.fema.gov/view-your-communitys-preliminary-flood-hazard-data-0>

We also have the Preliminary flood zones on our **GIS system** at Town Hall. Ask for Dody Adkins-Perry at the Town Planner or Engineering windows on the second floor and she can determine the location of the Preliminary flood zone lines on your property.

Note: The mapped flood zones define areas where flood insurance is federally mandated. For purposes of new construction or reconstruction, Bourne's Building Inspection Department will require topography prepared by a surveyor to determine the actual site-specific flood zone lines on your property, as opposed to the more generalized flood zone lines on the flood zone maps.

Q. FEMA's Index Map (25001CINDOA) directed me to the wrong map...

A. Having encountered the same problem ourselves, we have created a corrected **Index Map** which is now posted in place of 25001CINDOA.

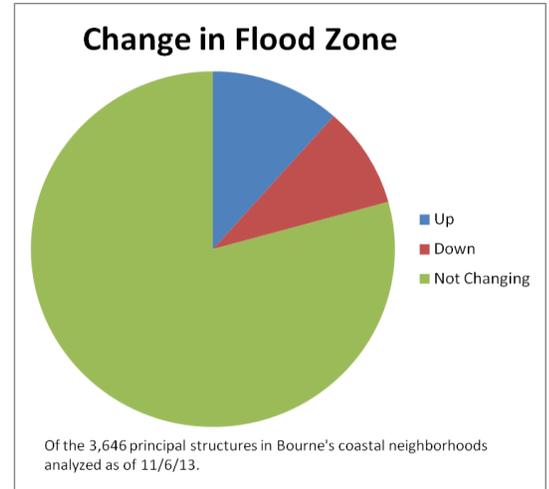
Q. What's new on the new maps?

A. As expected, the new flood zones are larger in many cases than the 1999 flood zones currently in effect, and most base flood elevations (height of the storm surge) are being raised by 1 to 3 feet. (See next page.) However, much of the increase is in areas that have no buildings.

Q. How many houses and businesses in Bourne are being re-mapped into a different risk zone?

A. From our latest analysis, of 3,646 principal structures in coastal neighborhoods, 421 (12%) are being remapped up in zone, 334 (9%) are being remapped down in zone, and 1,023 (79%) will not be changing on the new maps.

This compares to the total of approximately 9,000 principal structures in Bourne and to the current 1,333 flood insurance policies in Bourne. It is far less of an increase than in some other towns on the Cape, e.g., Dennis.



Q. What proportion of Bourne structures are in high risk flood zones?

A. Currently 21% of the principal structures on Bourne properties are in an AE or VE zone. The new maps will bring that proportion to 22%.

Q. Where are most of the changes in flood zone located?

A. Many structures that will be changed in flood zone are scattered widely in areas in or near current flood zones. There are some village and neighborhood clusters.

- In **Sagamore Beach**, on the shoreward side of **Phillips Road** from Bradford Road south, 20 houses formerly in the X zone will be remapped up to the VE zone. One house on the inland side of Phillips Road, formerly in AE, will be remapped up to VE.
- On **Main Street** east of Harrison Avenue, and on **Perry Avenue** and **Old Bridge Road**, 25 buildings (including the community building) formerly in the X or X500 zone will be remapped up to the AE zone.
- On **Taylor's Point**, all but one of the 142 houses currently in the VE zone will be remapped **down** to the AE zone.
- In **Hideaway Village**, 11 houses will be remapped up into a higher risk zone; 15 houses will be remapped down.
- In the rest of **Buzzards Bay**, approximately 55 houses will be remapped up, and approximately 20 houses will be remapped down.
- In **Gray Gables**, 53 houses will be remapped up, and 8 will be remapped down.
- In the **rest of Bourne Village**, approximately 41 houses will be remapped up; 8 of these are clustered in the **Keene St/Coastal Way/Maritime Way/Farnum Rd/Winslow St/Emerson St** area. Approximately 4 houses will be remapped down.

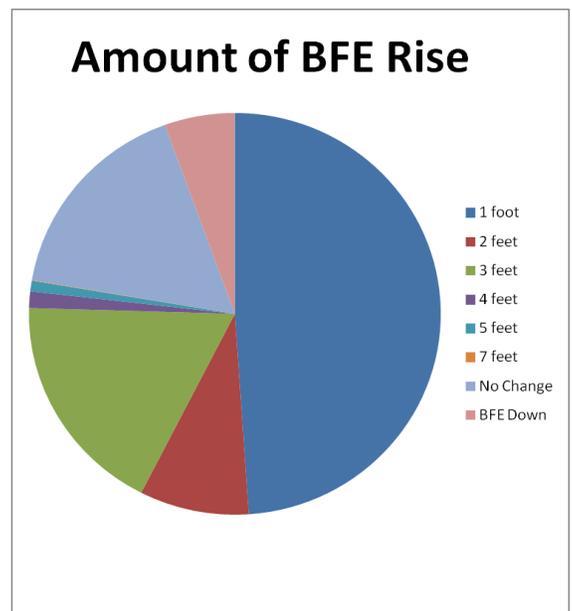
- On **Mashnee Island**, the letters of map revision currently in effect will be superseded by the new maps; 13 houses will be remapped up, and 11 will be remapped down.
- In **Monument Beach**, approximately 32 houses will be remapped up, and approximately 26 will be remapped down.
- In the **Circuit Avenue** area, 44 houses will be remapped up, and 7 will be remapped down.
- In the **Wenauet Bluffs** area, 19 houses will be remapped up.
- In **Tahanto**, 11 houses will be remapped up and 3 will be remapped down.
- In the **Kenwood Road/Cove Lane/Kendrick Lane** area, the letter of map revision currently in effect will be superseded by the new maps; 4 houses will be remapped up, and 34 houses will be remapped down.
- On **Wings Neck**, in the **Beverly Road, Beacon Point** and **Harbor Drive** areas, approximately 29 houses will be remapped up, and 1 will be remapped down. On the **rest of Wings Neck**, approximately 14 houses will be remapped up, and approximately 4 will be remapped down.
- In the **rest of Pocasset**, approximately 27 houses will be remapped up, and approximately 19 will be remapped down.
- On **Bassetts Island**, 3 houses will be remapped up.
- On **Spruce Drive, Cedar Point Drive and Elgin Road**, 21 houses will be remapped up, and 4 will be remapped down.
- On **Scraggy Neck**, the two letters of map revision currently in effect will be superseded by the new maps; 5 houses will be remapped up, and 20 will be remapped down.
- Around **Squeteague Harbor**, 10 houses will be remapped up.
- In the **rest of Cataumet**, approximately 8 houses will be remapped up and approximately 2 will be remapped down.
- In **Sagamore**, on **Freighthouse, Regency and Sandwich Roads**, 6 houses will be remapped up, and 1 will be remapped down.

Q. What about changes in Base Flood Elevation?

A. Of the 1,883 principal structures already in AE and VE zones, **over 3/4 of these are being remapped up into a higher Base Flood Elevation**—921 (about half) of them by 1 foot, 500 (27%) of them by 2 to 3 feet, and 41 (2%) by 4 to 5 feet. BFE for one structure will go up by 7 feet. Only 316 (17%) will be unchanged in BFE. For 104 (6%) of them, BFE will go down.

** BFE = height of the storm surge as projected by FEMA for a 1% annual risk storm. **

For the remaining 1,763 of principal structures in coastal neighborhoods that we have reviewed, the



concept of change in BFE does not apply, as they are either being remapped out of, in to, or are remaining in an X zone—a lower risk zone for which FEMA does not calculate a base flood elevation.

Q. Meanwhile, what flood maps are in effect?

A. The 1999 paper maps, plus any Letters of Map Change (LOMAs and LOMRs) that have been in effect, continue in effect until the effective date of the new maps which is projected to be July 16, 2014.

Q. Will my LOMA or LOMR continue in effect after the new maps take effect?

A. Some will and some won't. See FEMA's final Summary of Map Actions (**SOMA-2**) list recently received and posted separately on the website. It includes two additional LOMAs that will be revalidated (13-01-2236A and 14-01-0209A, and one additional LOMA that will be superseded by the new maps (13-01-2644A). See also the section on LOMAs and LOMRs on page 18.

Q. What about appeals?

A. There was an Appeals period that ended on October 17, 2013. An appeal of the new maps would have had to be accompanied by in-depth scientific documentation that could go head to head with FEMA's science and engineering that have produced the new maps—new topography, hydrologic and hydraulic analysis, wave analysis (height, setup and runup), and frontal dune analysis, using the new transects. FEMA did not accept appeals based on people's impressions or experience.

An appeal of the new maps would have been very different from the protests that the Town and some residents filed in 2010, during the Map Modernization digitization project whose goal was essentially to create a digital version of the 1999 maps. In that protest process, all that was necessary was a surveyed plan showing elevation above the base flood elevation.

The current revision process is a total reassessment of the flood risk, and changes are to be expected.

As a practical matter we did not expect there to be successful appeals of the new maps in Bourne.

A more likely avenue of relief, where warranted, might be Letters of Map Amendment (LOMAs) in site-specific situations. See the section on LOMAs on pages 18-20.

Q. Why and how are the flood maps being changed?

A. As FEMA says on their website, "Flood risk can, and does, change over time."

As FEMA initially explained their intentions to the Town:

"[This study combines] new engineering analysis with updated flood hazard data...

"This...restudy will result in updated technical data being incorporated into the Barnstable County coastal DFIRMs [flood zone maps].... Tasks will include field survey and reconnaissance activities, review of the coastal hydrology, and updates to the hydraulic analysis for the shoreline of the Town of Bourne. This data will then be utilized to produce an updated Flood Insurance Study (FIS) report and updated coastal DFIRM panels for the Town of Bourne... Field survey and reconnaissance activities...will include visual inspection of the shoreline to identify changes in physical conditions from the previous FIS report, determine the condition of shore protection structures and natural barriers, and evaluate potential locations for transects used in our hydraulic analysis."

From the study itself, dated May 3, 2013:

"[The study] revises and updates information on the existence and severity of flood hazards,...

"aids in the administration of the National Flood Insurance Act of 1968 and the Flood Disaster Protection Act of 1973,... and... [to meet] minimum floodplain management requirements for participation in the National Flood Insurance Program (NFIP)."

The LIDAR-based digital topography that FEMA used appears from our review to be much more accurate than the digital topography that was used for the Map Modernization project of 2009-2010. It has resulted in correction of some known errors on the current maps, and in more detailed flood zone boundaries than on the current maps. FEMA’s risk modeling of a 100-year storm reflects scientific and technological advances since their last engineering study thirty years ago. Of the 16 new transects used, 11 were determined not only by the new LIDAR elevations but by actual survey. (Transects are cross-sections from sea floor, shoreline and shoreward topography at key locations.) Sea level has also risen since the mid-1980’s by 5-6 inches according to USGS data.

Q. Are the maps being changed “with the intention of including more people in the zones in order to balance the books?”

A. That is not our impression at all. Please note that in Bourne, almost as many structures (334) are being re-mapped DOWN to a lower risk zone as are being re-mapped up to a higher one (421) .

Q. Have there been changes to the inland (pond) flood zones in Bourne?

A. No, we have not found any, and FEMA has said that the current revision is of coastal floodzones only.

Q. What happened to the 2009-2011 Map Modernization project to digitize the flood maps?

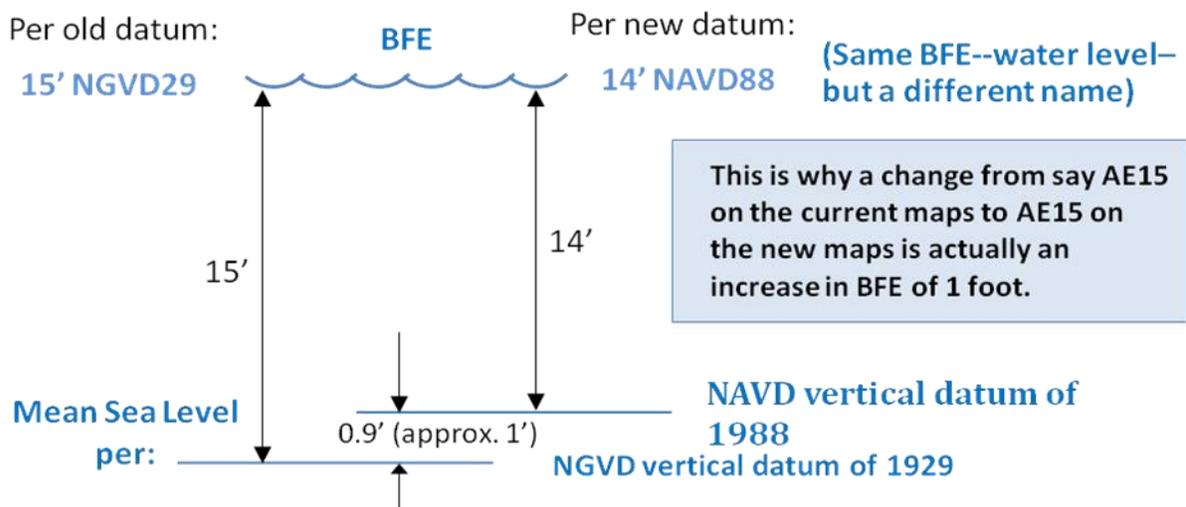
A. That revision was rescinded. The nationwide coastal map revision project “Risk MAP” apparently “caught up” with the Map Modernization project, which had many delays and revisions. A letter from FEMA dated Jan. 31, 2012 informed us that the Map Modernization digitization project would be combined into the more comprehensive Risk MAP coastal flood zone revision project.

Q. What about the change in datum?

A. Storm surge levels (BFE) were previously measured above an older datum for mean sea level that was approximately 1 foot lower than the newer datum on which the new BFE’s are based. The 1999 paper maps currently in effect used the NGVD datum of 1929. The new maps use the NAVD datum of 1988. So if your property is in zone AE elev. 14 on the 1999 paper map, and the new map shows it as AE elev. 13, that represents no change in your base flood elevation. If you are currently in AE elev. 14 and the new map shows AE elev. 14, you are being remapped up by approximately 1 foot.

When we say you have been remapped up by, say, 1, 2 or 3 feet, we have corrected for the change in datum. The change we are quoting is the actual change in the projected height of the storm surge.

Here’s an example.



Q. For properties that are re-mapped up in risk on the new maps, will there be major consequences?

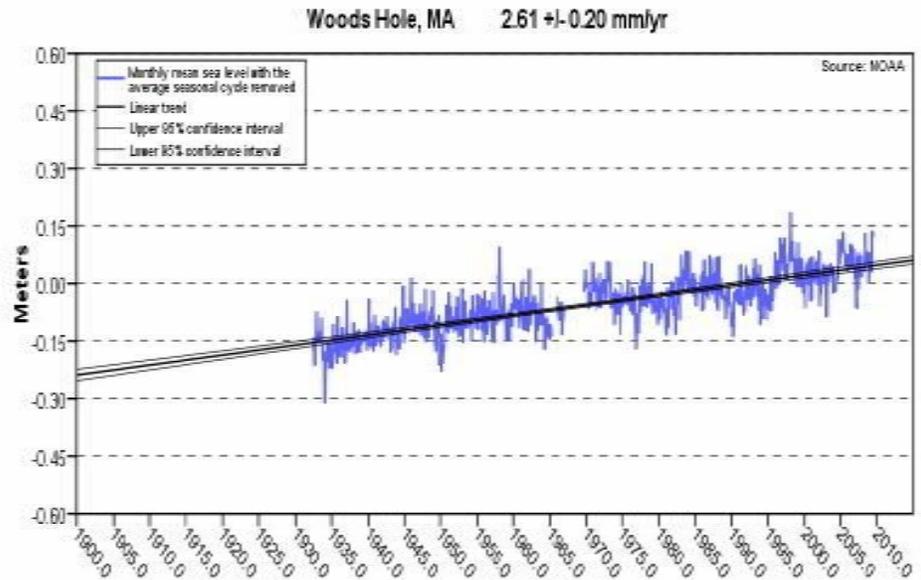
A. Yes.

- For structures that are re-mapped up from the X zone into an AE or VE zone, flood insurance will now be required—federally mandated—by banks or other holders of federally regulated or federally insured mortgages. The higher the risk rate (AE is higher than X; VE is higher than AE), and the higher the base flood elevation, the higher the premium.
- For structures mapped up from AE into VE, premiums will jump to a higher level.
- For structures mapped up into a higher base flood elevation, premiums will likely go up.

Please note that the **Biggert-Waters Flood Insurance Reform Act of 2012** requires **subsidized rates and Grandfathering to be phased out**. This law will probably also shorten the length of the Preferred Risk Policy Extension. Rates for many properties will be rising significantly even if they are not being remapped into a different flood zone. See sections on these topics below.

Q. What do you mean, sea level rise? I don't believe you!

A. Here is the sea level rise in Woods Hole from 1933 to 2009.



Q. What if just a small portion of my house is in a special flood hazard area (AE or VE)?

A. Under the National Flood Insurance Program (NFIP), for purposes of determining whether flood insurance is mandatory, any structure that is partially in a special flood hazard area (SFHA—AE or VE zone) is considered the same as if the entire structure were in the SFHA. A slight change from the old to new flood maps that brings a corner of the house into a higher risk zone, where previously the entire structure was determined to be in a lower risk zone, will likely result in your lender or insurer considering that the structure is in the higher risk zone. This can mean that you will be mandated to carry flood insurance for the first time, or that your risk rate will go up.

Q. What relief, if any, will property owners have if they are re-mapped up into a higher risk zone?

A. As noted above, the Biggert-Waters Flood Insurance Reform Act of 2012 reduces the opportunities for relief. See the following information on the FEMA website:

<http://www.fema.gov/flood-insurance-reform-act-2012>

And watch for further Information, as it becomes available, on this law and on when its various provisions become effective, including modifications that may be made by the Homeowner Flood Insurance Affordability bill currently before Congress and/or various other initiatives.

If re-mapped up from an X zone into an AE or VE zone, you may still be able to take advantage of the FEMA Extended Preferred Risk Policy (PRP) for awhile. This provision “breaks you in gently” to paying for flood insurance, by offering a lower rate to start with. The Biggert-Waters Flood Insurance Reform Act of 2012 modifies the Extended Preferred Risk Policy that was adopted in 2011, so you will want to watch for new information about the PRP. It is our understanding that if you start at the PRP in July 2014, your rates at some point will start to rise 20% per year (25% for rentals, second homes and businesses) until they reach the true risk rate for your property.

Other avenues of relief that may still be possible under Biggert-Waters:

- Apply to FEMA for a Letter of Map Amendment, IF you can document that every enclosed area of your house is sufficiently high above the Base Flood Elevation of your flood zone.
- Higher deductibles might lower your premium.
- When remodeling or rebuilding: Raising the floor level (even above required levels) will lower your risk and might reduce your premium. See the FEMA **Rebuild Datasheets**:
http://www.fema.gov/media-library-data/20130726-1910-25045-7987/fema_datasheet_rebuild_aezone05.pdf
http://www.fema.gov/media-library-data/20130726-1910-25045-1646/fema_datasheet_rebuild_vezone06.pdf
http://www.fema.gov/media-library-data/20130726-1858-25045-7797/build_back_stronger02_2013.pdf

Adding vents to your foundation or using breakaway walls might reduce your premium.

- Grandfathering—which may still apply, either briefly or, if pending legislation is successful, for somewhat longer. At some point, premiums are supposed to increase by 20% per year for primary residences and by 25% per year for rentals, secondary residences and businesses, until the premium covers the true risk for the property.

Talk to your insurance agent about your flood insurance options.

Q. I have not heard an answer back to the protest I filed under the Map Modernization project, or to the protest that the Town filed on my behalf, over my property being re-mapped up. Can I assume that my protest was successful?

A. No! You should assume that most of the work on your protest was wasted effort for both you and the Town. The part of it that may not have been a waste is if you acquired documentation that your structure is currently in a lower risk zone than it will be on the new maps, or if you were able to document that your structure was built to the flood zone standards that were in place at the time it was built. These might possibly entitle you to some temporary relief through the Preferred Risk Policy Extension or Grandfathering.

Biggert-Waters Flood Insurance Reform Act of 2012:

Q. What is the Biggert-Waters Flood Insurance Reform Act of 2012?

A. A federal law passed on July 6, 2012, the Biggert-Waters Flood Insurance Reform Act of 2012 is making major changes to the National Flood Insurance Program. It requires, among other things, that the premiums paid for flood insurance be adjusted to reflect the actual risk of flooding of each property. New policies are to be at the actual risk rate. For those existing policies that are now at subsidized rates (in Bourne, 794 policies or 70% of the 1,333 policies) premium rates are to rise at the rate of 20% or 25% per year until the actual risk rate is reached. Grandfathering will no longer run in perpetuity, and the Preferred Risk Policy Extension, though as of today it still exists, will be shorter. See the re-written sections on the Preferred Risk Policy extension and Grandfathering, below.

Note: There are bills pending before Congress, also lawsuits and other initiatives, that may delay and/or roll back implementation of various aspects of Biggert-Waters; see next section. You will need to keep checking for updated information.

Q. How and why was this law enacted?

A. The U.S. Congress passed this act in 2012 to create financial viability for the National Flood Insurance Program by eliminating subsidized rates. Federal flood insurance is now required to transition to a situation reflecting the actual risk.

Q. How will the Biggert Waters Flood Insurance Reform Act of 2012 affect me?

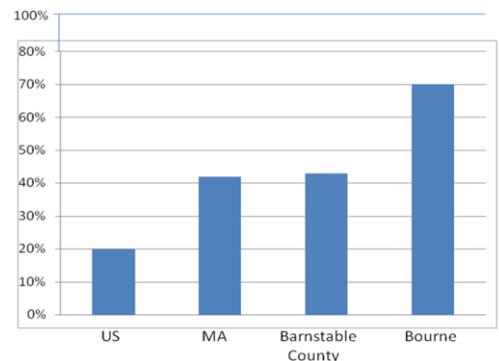
A1. If you are already paying standard (full-risk) rates, your rates will not be affected by the new law.

Note: Nationwide, 80% of NFIP policies are already paying standard rates. However, **in Bourne only 30% of policies are already at standard rates.**

Looked at the other way (see graph):
Nationwide, only 20% of policies are subsidized, whereas in Bourne 70% of policies are subsidized.

Under Biggert-Waters, FEMA must transition these policies up to paying full risk.

Proportion of Subsidized Flood Insurance Policies



A2. If you are paying subsidized rates, your subsidy will be phased out until your rate has risen to the actual risk rate.

For primary residences, the rate of rise from subsidized rates will be 20% per year until the actual risk rate is reached. For secondary residences (rentals, and seasonal, i.e. you live in it less than 80% of the year), and business/non-residential properties, the rate of rise in premium will be 25% per year.

It is our understanding that Biggert-Waters allows primary residences in AE and VE zones that are paying subsidized rates to keep those rates unless or until:

- The flood zone map is revised (projected to be July 16, 2014), or
- The property is sold, or
- The policy lapses, or
- Severe, repeated flood losses are suffered on the property, or
- A new policy is purchased

Each property's risk is different. Also, there are bills before Congress that may delay or roll back aspects of its implementation. But it seems inevitable that flood insurance premiums are eventually going to go much higher than most people in Bourne are used to.

Q. How high will these “standard” rates go?

A. We don't know. We have seen predictions from FEMA, and quotes from second-hand sources, in the range of \$4,000 – \$5,000 for AE , and \$15,000 – \$20,000 and up for VE. Biggert-Waters intends structures to be rated very specifically, so these figures may or may not apply to your structure. However, we think it is helpful to have a rough ballpark figure for comparison.

Here is some information on rates from FEMA:

<http://www.fema.gov/media-library/assets/documents/33320?id=7763>

If you receive a quote for renewal of your flood insurance that shocks you, especially if it represents more than a 20% increase over last year (or 25%, if you are a seasonal resident), we recommend that you raise your concerns promptly with all parties concerned (typically your insurance agent and your lender). There may be an error. If you are told that the new rate is the result of the new maps, we recommend that you question how maps that are not yet effective can determine the premium you must pay now. You may want to challenge whether any of the triggers on the bulleted list above applies to you. You may also want to ask what the ultimate “standard” rate is to which you are beginning to be transitioned. We are aware of some shocking new rate quotes that have been corrected as a result of homeowners' persistent efforts to have the situation reevaluated.

Caveat: Please refer to the question on page 3 about “What should I do if my lender contacts me...” You do not want to be “force-placed” as a result of non-compliance.

Q. When will the changes mandated by Biggert-Waters happen?

A. Many of the changes are already taking effect. People who purchased houses since July 2012 are already being charged market rates. Many people whose flood insurance renewed from October 2013 have seen a shocking increase in the premium—especially shocking considering that this will be only the first of four or five similar-sized hikes.

FEMA said on 1/25/13: “Even if you build to minimum standards today, you will be subject to significant rate increase upon remapping if your flood risk changes in the future.”

A bill that would delay further rate hikes for many properties until an affordability study can be completed has passed the US Senate but faces stiff opposition in the House. See more on this and other initiatives on pages 13 through 16.

Q. Where can I get more information on Biggert-Waters and the pending legislative initiatives?

A. FEMA maintains a link re Biggert-Waters at:

<http://www.fema.gov/flood-insurance-reform-act-2012>

There is a tracker available at <http://beta.congress.gov/> where you can search by the name or partial name or number of legislation, such as the bills discussed in the next section.

There are frequent articles in the paper and online press on many floodzone-related issues, including the pending bills. Caveat: This is a complicated and rapidly changing situation, and most of the articles we have read contain errors.

Realtors, mortgage brokers, lenders and insurance agents are all struggling to keep up with the changes that have been mandated by Biggert-Waters, and the legislative initiatives that are still unfolding.

We will post information on new developments as we are able to confirm them.

Homeowner Flood Insurance Affordability Bill:

Q. What about the bill the US Senate has passed that would “reform” the Biggert-Waters Flood Insurance Reform Act of 2012?

A. A joint bipartisan bill called the **Homeowner Flood Insurance Affordability** bill was introduced in both houses of Congress on Oct. 29, 2013. Sponsored by many including both of our Senators, Elizabeth Warren and Ed Markey, also Sen. Waters of the original Biggert-Waters law, and many Congressmen including Bill Keating, this bill passed the Senate on Jan. 30. Its fate in the House is more dubious. We do not know when, or whether, this bill, or a modification of it, will become law, although in October 2013 the many sponsors and co-sponsors spoke confidently of swift passage. Note: This bill is also called “Menendez-Isakson.”

Q. What effects would the Homeowner Flood Insurance Affordability Act have, if enacted?

A. We have read the originally proposed legislation in full. The version passed by the Senate included several amendments which we have not yet been able to read. We are following the status of this legislation closely, however there is no way to know at this point what the final provisions may be if and when it becomes law.

With that caveat, here are effects proposed in the bill as originally drafted:

- For structures built or rebuilt in compliance with flood zone regulations in effect at the time of construction/reconstruction: continuation of grandfathering until 6 months after FEMA meets 3 conditions regarding affordability studies and certification that FEMA’s methodology is correct. Phase-out of this grandfathering was not supposed to begin until late 2014 under Biggert-Waters, so if the new law passes fairly quickly, this might be a true delay rather than a rollback.
- For Pre-FIRM structures (structures built before 1974 when Bourne enacted the National Flood Insurance Program): delay (or rollback) of rate increases beyond the originally subsidized rates, until 6 months meets the 3 conditions.

- For properties whose ownership was transferred after July 6, 2012: rollback of the rate increases they incurred under Biggert-Waters, to last until the 6 months after FEMA meets the 3 conditions.

We have read secondary sources stating that relief for the following are also NOT included, but **we have not been able to corroborate this:**

- Business properties
- Non-primary residences (rentals and seasonal homes)
- Severe repetitive loss properties or have had cumulative flood insurance claims exceeding the market value of the property.
- Structures that have been substantially damaged, or substantially improved, since July 6, 2012.

The Senate-passed version of the bill includes several amendments, which appear mainly to strengthen the relief offered by the bill, but we have not seen their actual language.

Q. Is it true that the Homeowner Flood Insurance Affordability Act would delay implementation of Biggert-Waters by four years?

- A. Not in so many words; but the bill requires that the new rates be “delayed” until two things are completed that everyone seems to agree will take about four years: an affordability study of the new rates, and a peer review of FEMA’s mapping methodology, also expected to take four years.

We put “delayed” in quotation marks, because FEMA and its agents were already mandated by Biggert-Waters to raise rates on an aggressive schedule. So while the current bill speaks of “delaying” rate increases beginning with the date of enactment of the proposed law, the rate hikes are meanwhile happening. FEMA and insurance agents are doubtless required to continue implementing the original provisions of Biggert-Waters, including the rate increases. (Nor is it clear whether rates later deemed unaffordable, but already paid, would later be refunded.)

Other Initiatives Designed to Limit the Effects of Biggert-Waters:

Q. What other initiatives are there?

- A. Two that we are aware of:
1. MA Attorney General Martha Coakley and Speaker of the House Robert DeLeo in October 2013 introduced state legislation (**An Act Relative to Flood Insurance**) to limit the amount of flood insurance banks can require (would be limited to the outstanding mortgage balance). However, as of Jan. 13 there appears to have been no further action on this bill.
 2. A lawsuit was filed in a federal court in Mississippi in September 2013, alleging that the rates under Biggert-Waters are arbitrary and unlawful, in support of which Martha Coakley and officials from many other states have filed friend-of-the-court briefs. It too is still pending to the best our knowledge.

Opposition to the drastic rate hikes and the aggressive schedule of implementing them is widespread in both coastal states and states subject to river flooding.

Q. Where can I get more information on pending initiatives to modify Biggert-Waters?

A. There is a tracker available at <http://beta.congress.gov/> where you can search by the name or partial name or number of legislation.

Internet searches on key phrases such as “lawsuit flood Mississippi,” “Massachusetts Act Relative to Flood Insurance,” “Biggert Waters,” etc., will yield recent articles on the various local, regional and national efforts to soften the effects of Biggert-Waters.

This is a rapidly changing situation. Most of the articles we have read contain errors.

Realtors, mortgage brokers, lenders and insurance agents are all struggling to keep up with the changes that have been mandated by Biggert-Waters, and the legislative initiatives that are still unfolding. We will post information on new developments as we are able to confirm them.

Preferred Risk Policy Eligibility Extension:

Note: The Biggert-Waters Flood Insurance Reform Act of 2012 was intended to shorten and eventually eliminate the Preferred Risk Policy Eligibility Extension.

Q. How and why was the Preferred Risk Policy Eligibility Extension created?

A. The U.S. Congress, concerned about the burden of re-mapping on homeowners during the recession, passed a law in 2010 requiring FEMA to create this eligibility extension.

Q. What is required in order meanwhile to take advantage of the extended Preferred Risk policy, if I am being re-mapped up from the X zone into an AE or VE zone?

A. For homeowners who are remapped up from an X zone into AE or VE by a FEMA map revision, and who have not previously received federal flood insurance or flood disaster benefits more than once, this extension offers a transition period of flood insurance at the Preferred Risk rate which is much lower than the AE or VE rate, in fact is usually less than half of the full X zone rate.

Q. How can I find out if I will be eligible for the Preferred Risk Policy Extension?

A. Contact your insurance agent. And see these FEMA links, which incorporate what is currently known about how it will be affected by the Flood Insurance Reform Act of 2012:

http://www.floodsmart.gov/floodsmart/pdfs/prp/prp_community_talking_points.pdf

http://www.floodsmart.gov/floodsmart/pdfs/prp/prp_community_faqs.pdf

http://www.floodsmart.gov/floodsmart/pdfs/prp/prp_community_factsheet.pdf

Q. What documentation is required to apply for an Extended Preferred Risk policy?

A. FEMA lists the following as acceptable forms of documentation for current and prior map information (any one of them might be sufficient, and in no case would you need all of them):

- Letter of Map Amendment (LOMA)
- Letter of Map Revision (LOMR)
- Letter of Determination Review (LODR)
- Copy of a flood map marked to show the location and flood zone of the building.
- Signed & dated letter from a town official indicating address, flood zone, map panel & eff. date.
- Flood zone determination certification that guarantees the accuracy of the information.
- Elevation Certificate (EC), indicating address and flood zone of the building, signed and dated by a surveyor, engineer or architect. See Section on Elevation Certificates on page 20.

Q. How long will I be eligible to pay at the Preferred Risk rate, if I qualify?

A. We don't know. When the extension was first enacted, you could remain at that rate for up to two years. However, it appears that the Biggert Waters Flood Insurance Reform Act of 2012 will likely reduce that time if it does not eliminate the Preferred Risk Policy Extension completely.

Be sure to read the section on Biggert-Waters above. Please note that, so far, we have seen no mention in the Homeowner Flood Insurance Affordability bill regarding the PRP Extension.

Grandfathering:

Note: The Biggert-Waters Flood Insurance Reform Act of 2012 was intended to phase out Grandfathering. But currently pending legislation could extend it. Eventually, Grandfathering will probably be phased out altogether.

Q. What are the Grandfathering rules?

A. Grandfathering is intended to be phased out pursuant to the Flood Insurance Reform Act of 2012.

But until that happens, policyholders whose properties are mapped up in risk by the new flood zone maps can qualify for grandfathering, which might save some money in the short term. Under grandfathering, you continue paying the lower rate for your previous zone instead of shifting to the higher rate for the new zone or new Base Flood Elevation. But subsidized rates, including grandfathering, will be phased out by the new law. Properties previously assessed subsidized rates will begin to see annual rate increases of 20% (25% for rentals, second homes, and businesses) until the standard (true risk) rate is reached.

Be sure to read the sections on the Biggert Waters law and the Homeowner Flood Insurance Affordability bill, above.

Q. Can I be grandfathered if the new map does not show a change in my risk zone (or base flood elevation) from the 1999 map?

A. Generally, No, with the following exceptions:

- 1) If you have a current flood insurance policy based on a lower risk zone than on the new map.
- 2) If a LOMA or LOMR has removed your structure or property from the higher risk zone, and the LOMA is listed on SOMA-2 to be revalidated.

In these two cases we believe that you can be grandfathered, that is, locked in to your current risk rate—until you encounter the rate increases required by the Flood Insurance Reform Act of 2012.

Q. How can I know for certain that I will be grandfathered?

A. Keep a copy of any paperwork demonstrating that you have been re-mapped up into a higher risk zone. It is our understanding that you will NOT receive a notice stating that you will be grandfathered. You will want to get confirmation of some sort that you will be/are being grandfathered, probably from your insurance agent.

Caveat: At this point we do not know whether, or for how long, any of the above Grandfathering info is still valid.

Q. What determines the base risk rate to which the new risk rate is compared, to decide whether I'm eligible for grandfathering?

A1. If you currently have flood insurance: The risk rate that you are currently insured for. If you are paying for flood insurance based on zone X now, and you are being re-mapped up into AE, you can be grandfathered in X. If you are paying for flood insurance based on zone AE now, and you are being re-mapped up into VE, you can be grandfathered in AE. The risk rate on the insurance you are currently covered under trumps any determination the lender or their consultants may make, *for the purpose of deciding whether you are eligible for grandfathering.*

Note that the lender still has absolute power to interpret the FEMA FIRM map to determine what flood zone you are going to be located in. Your only formal relief from the lender's determination is LOMA review. It is also possible that the lender's flood-determination vendor will be willing to make a redetermination based on your supplying additional documentation. But you should meanwhile comply with the lender's requirements while you await results of a LOMA review or a request for redetermination by the lender's flood-determination vendor, because otherwise the mortgage-holder can meanwhile enroll you in "force-placed" private flood insurance that could cost much more than federal flood insurance.

A2. If you do not currently have flood insurance: Your risk zone as shown on the 1999 FEMA FIRM map.

Q. Does grandfathering end when I sell or convey my property?

A. Yes. (Prior to the Flood Insurance Reform Act of 2012, it did not.) But keep checking the outcome of pending legislation.

Q. Is my grandfathered lower risk rate jeopardized if I change insurance carriers?

A. Yes. (Prior to the Flood Insurance Reform Act of 2012, it was not.) But keep checking the outcome of pending legislation.

Q. Who holds the risk for structures that are insured under grandfathered lower risk rates?

A. FEMA. The policies typically are purchased through local insurance agents or brokers who then place the coverage with an insurance company that is participating in the FEMA Write Your Own Program (WYO). The companies are basically servicing agents.

Q. My insurance agent has never heard of grandfathering. What should I do?

A. "WYO" is the key. Ask the agent if they participate in the FEMA Write Your Own Program (WYO). If not, check with other insurance agencies to find one that does participate in the FEMA WYO Program.

Q. Can I be grandfathered into the flood zone that I was in on the 1974 or 1985 flood maps?

A. No. Our understanding is that grandfathering relates only to a situation where you are being re-mapped up from a **current** lower risk zone to a higher risk zone. The relevance of earlier dates is only to your eligibility for grandfathering based on whether your structure conformed to flood zone building regulations at the time it was built or re-built. Your current risk zone might reflect previous grandfathering. But to our knowledge you cannot now be grandfathered for the first time back to a flood zone more than one revision back in time.

Q. Can I be grandfathered if I do not currently have flood insurance?

- A1. For structures built before 1974 that are **not** eligible for the Preferred Risk Policy Extension: Yes—but only if you purchase flood insurance in time for it to go into effect before the effective date of the new flood maps. It generally takes at least 30 days from date of application for your flood insurance to take effect, so you should be shopping for flood insurance by early spring 2014.
- A2. For structures built after 1974: Yes—if you can document compliance with flood standards in effect when the structure was built and/or renovated. Documentation may include old building permit(s) plus a certified foundation plan, elevation certificate, etc.

Q. How long will my grandfathering last?

- A. For a limited time. That’s all we can say at this point. Unless Biggert-Waters is radically re-visited, grandfathering will eventually be phased out. Note: This is a big change. Grandfathering used to run with the property in perpetuity. Be sure to read the section on Biggert Waters above.

Caveat: At this point we do not know whether, or for how long, and in what circumstances, the above information on Grandfathering will remain valid.



LOMAs:

Q. What is a LOMA?

- A. LOMA stands for Letter of Map Amendment. It is an official finding by FEMA as to whether, on a property located in an AE or VE zone, a particular structure is so sited or so built that the structure itself is considered “removed” from the higher flood hazard zone.

Q. What if my floor elevation is much higher than the surrounding grade?

- A. This is one of the most common situations that prompts property owners to seek a LOMA from FEMA. With sufficient documentation of your floor elevation, relative to the base flood elevation set by FEMA, you may be able to receive a LOMA determination that will remove the structure from the special flood hazard area.

Q. Can I apply for a LOMA before the new flood zone maps become effective?

- A. Yes. But you should probably wait until the new maps become effective, because the new maps may supersede LOMAs granted between now and the new maps’ effective date.

On the other hand, if you are being required by a lender to get flood insurance for the first time now, or at a higher risk rate than previously, and you believe that you have a good case for a LOMA removing your structure from the higher risk zone, it might be wise to apply for a LOMA now. If your structure is removed from the higher risk zone by the LOMA, you would then have documentation of being in a lower risk zone now. If on the new maps you are re-mapped up into a higher risk zone, your LOMA could become the basis of your being able to take advantage of the extended Preferred Risk rate or Grandfathering.

Note: This is less of an advantage now than before Biggert-Waters¹ was enacted, and may not be worth the expense of preparing documentation for a LOMA.

Q. How do I apply for a LOMA?

A. The following information was pasted from the FEMA website www.fema.gov in 2011. It is still current to the best of our knowledge.

LOMA Determination Requirements

- **LOMA Requests Involving One or More Structures:** For a LOMA to be issued by FEMA to remove one or more structures from the SFHA, the NFIP regulations require that the lowest adjacent grade (the lowest ground touching the structure) be at or above the BFE.
- **LOMA Requests Involving One or More Lots:** For a LOMA to be issued by FEMA to remove one or more entire lots from the SFHA, the NFIP regulations require that the lowest point on the lot(s) must be at or above the BFE.
- **Review and Processing Fee:** There is no review and processing fee for the FEMA review of a LOMA request.
- **Required Information:** The requester is responsible for providing all of the information needed for FEMA's review of the request, including elevation information certified by a Licensed Land Surveyor or Registered Professional Engineer. For a complete listing of the information that must be submitted in support of a LOMA request, please refer to the MT-EZ (for single lot/structure requests) or MT-1 application forms package. See links below.

The following links are current as of June 26, 2013:

To MT-EZ form:

<http://www.fema.gov/library/viewRecord.do?id=2328>

To MT-1 form:

<http://www.fema.gov/national-flood-insurance-program-flood-hazard-mapping/mt-1-application-forms-instructions>

Q. If I have applied for a LOMA, can I safely ignore notices from my mortgage holder requiring me to get flood insurance at a new higher rate?

A. No! Even though you may win your LOMA, your lender is legally able meanwhile to “force-place” you into private flood insurance, potentially at higher cost even than federal flood insurance. If your lender requires you to get flood insurance at a new higher risk rate, you will usually be better off somehow complying with that requirement by obtaining federal flood insurance now, and then hopefully winning your LOMA from FEMA, resulting in lowering of your costs thereafter, possibly even on a pro-rated basis.

Q. Is force-placed flood insurance always more expensive than federal flood insurance?

A. Not always, at least not in the short run. We are aware of banks’ occasionally charging lower rates than the federal flood insurance rates, for force-placed private flood insurance. However, you should learn and consider all of your options. Lower private rates are not likely to last, and there may be no restriction on the amount by which they can be raised in a single year. And if grandfathering survives for awhile longer, you might lose your grandfathering if you exit the federal flood insurance program.

Q. What is a LOMR?

A. A LOMR (letter of map **revision**) is a revision of the flood zone line in a particular area, as opposed to a LOMA (letter of map **amendment**) which is a narrative finding regarding a particular structure.

Q. Will my existing LOMA or LOMR continue in effect after the new maps go into effect?

A. It may, but it may not. The new maps represent a total reassessment of flood risk.

- **No** LOMRs (revisions of sections of the 1999 maps) in Bourne will continue in effect.
- Some LOMAs currently in effect will be revalidated when the new maps become effective. Some will be superseded by the new maps.
- FEMA recently distributed their Final Summary of Map Actions (SOMA-2) list for Bourne, dated 11/15/13, specifying which LOMAs will be revalidated (will continue in effect) and which will be superseded by the new maps. Roughly half of them were slated to be superseded—even among LOMAs issued within the past four years.

Note: There are three LOMA’s on the SOMA-2 list that were not on the May 2013 preliminary SOMA-1 list: 13-01-2236A and 14-01-0209A, both of which will be revalidated, and 13-01-2644A which will be superseded.

- To find out whether your LOMA will be revalidated or superseded, refer to the SOMA-2 list posted separately on the webpage.
- For the LOMAs that are revalidated when the new maps become effective, **you will not be notified individually by FEMA that your LOMA has been revalidated.**
- If your current LOMA or LOMR is superseded and the new map raises your risk zone, you might be eligible for the Preferred Risk Policy Extension or Grandfathering. These options will be briefer in duration than they formerly were, due to Biggert-Waters, but if they survive at all, they could still result in savings in the short term. An existing LOMA or LOMR, even if superseded, may be helpful documentation of your current risk zone. So be sure to keep a copy of it in a safe place.

If you have questions about whether your property has a LOMA, or about whether an existing LOMA will be revalidated or superseded, do not hesitate to contact Dody Adkins-Perry for assistance: 508-759-0615 ext “#345”, dadkins-perry@townofbourne.com.

Elevation Certificates:

Q. What is an elevation certificate?

A. It is a form prepared by a registered surveyor, engineer or architect documenting the elevation of key features of your structure such as first floor of living area, sill, etc., as well as the flood zone that you are in and its base flood elevation.

Q. Why would I need an elevation certificate?

A. Many people tell us that their insurance agent or lender is requiring an elevation certificate before they can renew their flood insurance. This is probably driven by provisions of Biggert-Waters now in effect.

Q. The FEMA website says I can get an elevation certificate from the Town? Is this true?

A. No. Unfortunately, Bourne does not keep elevation certificates on file.

Please note too that while the Bourne Building Inspector was previously allowed to issue elevation certificates based on sufficient documentation regarding the as-built structure, FEMA’s current rules now prohibit anyone without a professional certification stamp from issuing elevation certificates. The Town of Bourne has no one on staff that can issue an elevation certificate under FEMA’s current rules.

Q. How much does an elevation certificate cost?

A. We have heard anecdotally that the cost ranges from several hundred to over a thousand dollars.

Q. I have an elevation certificate from 1975. Will that do?

A. We have heard, again anecdotally, that FEMA is requiring more recent elevation certificates. How recent, we don’t know.

Here is a link to a FEMA page re elevation certificates.

<http://www.fema.gov/library/viewRecord.do?id=7408>

Q. I still have questions...

A. Contact the Engineering Dept. at 508-759-0615 ext “#345,” or Dadkins-perry@townofbourne.com, also here are links to further information:

An interactive website for viewing the new maps and comparing to the current ones:

<http://climate.buzzardsbay.org/firm-review.html>

FEMA’s main website:

www.fema.gov/

FEMA’s flood-specific website:

<http://www.floodsmart.gov/floodsmart/>

Re the Biggert Waters Flood Insurance Reform Act of 2012:

General:

<http://www.fema.gov/flood-insurance-reform-act-2012>

FEMA BW Timeline Table 4.17.13:

[http://www.fema.gov/media-library-data/20130726-1912-25045-8239/bw timeline table 04172013.pdf](http://www.fema.gov/media-library-data/20130726-1912-25045-8239/bw%20timeline%20table%2004172013.pdf)

Questions & Answers About Biggert-Waters:

<http://www.fema.gov/media-library/assets/documents/31873?id=7266>

More Frequently Asked Questions about Biggert-Waters:

<http://www.fema.gov/region-vi/national-flood-insurance-program-reform-frequently-asked-questions>

Impact of National Flood Insurance Program (NFIP) Changes Fact Sheet:
<http://www.fema.gov/media-library/assets/documents/31517?id=7187>

NFIP Specific Rate Guidelines:
<http://www.fema.gov/media-library/assets/documents/33320?id=7763>

Historic Structures and the Biggert-Waters Act:
<http://www.fema.gov/media-library/assets/documents/34366>

Re the extended Preferred Risk policy:
http://www.floodsmart.gov/floodsmart/pdfs/prp/prp_community_talking_points.pdf
http://www.floodsmart.gov/floodsmart/pdfs/prp/prp_community_factsheet.pdf
http://www.floodsmart.gov/floodsmart/pdfs/prp/prp_community_faqs.pdf

Re Elevation Certificates:
<http://www.fema.gov/library/viewRecord.do?id=7408>

Re LOMAs:
Link to MT-EZ form:
<http://www.fema.gov/library/viewRecord.do?id=2328>

Link to MT-1 form:
[mt-1 application forms instructions](#)

Re Options for Rebuilding/Renovating that May Save on Future Premiums:
http://www.fema.gov/media-library-data/20130726-1910-25045-7987/fema_datasheet_rebuild_aezone05.pdf
http://www.fema.gov/media-library-data/20130726-1910-25045-1646/fema_datasheet_rebuild_vezone06.pdf
http://www.fema.gov/media-library-data/20130726-1858-25045-7797/build_back_stronger02_2013.pdf
