

WORKSHOP/SPECIAL MEETING  
APALACHICOLA CITY COMMISSION  
MONDAY, JULY 2, 2024 – 3:00PM – 4:00 PM  
FORMER APALACHICOLA MUNICIPAL LIBRARY  
74 6TH STREET, APALACHICOLA, FLORIDA 32320

**Agenda**

You are welcome to comment on any matter under consideration by the Apalachicola City Commission when recognized to do so by the Mayor. Once recognized please rise to the podium, state your name for the record and adhere to the three-minute time limit for public comment. Comments may also be sent by email to the City Manager or to Commissioners.

**I. Call to Order**

- Invocation
- Pledge of Allegiance

**II. FEMA Community Rating System (CRS) and Cumulative Substantial Improvements (CSI) Workshop**

**III. Public Comment**

**VI. Adjournment**

Any person who desires to appeal any decision at this meeting will need a record of the proceeding and for this purpose, may need to ensure that a verbatim record of the proceeding is made which includes testimony and evidence upon which the appeal is based. Persons with disabilities needing assistance to participate in any of these proceedings should contact the City Clerk's Office 48 hours in advance of the meeting.

cumulatively for at least 10 years

OR

- (b) 20 points, if the regulations require that reconstruction and repairs to damaged buildings are counted cumulatively for at least five years
  - (3) 20 points, if the community adopts regulatory language that qualifies properties for Increased Cost of Compliance insurance coverage for repetitive losses
  - (4) 20 points, if the regulations require that any addition to a building be protected from damage from the base flood
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### **Impact Adjustment for CSI**

CSI credit is adjusted based on the ratio of the area affected by the cumulative substantial improvement regulation to the area of the SFHA. See Section 431.c on calculating an impact adjustment.

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$$rCSI = \frac{aCSI}{aSFHA}, \text{ where}$$

aCSI = the size of the area(s) that qualify for CSI credit, and

aSFHA = the size of the community's SFHA

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### **Documentation for CSI Provided by the Community**

- (1) The activity documentation requirements in Section 431.d must be met.
- (2) At each verification visit,
  - (a) A list of all permits for building improvements or repairs in the regulatory floodplain that have been issued since the last visit. The list must include both substantial improvements and permitted projects that were not substantial improvements.  
  
The ISO/CRS Specialist will review permit records that document how the regulation has been applied. The records need to track permits by parcel number or address, so that the history of improvements or repairs to a particular structure is checked before the next permit is issued.

### **432.e. Lower substantial improvements threshold (LSI)**

The maximum credit for this element is 20 points.

The NFIP allows improvements valued at up to 50% of the building's pre-improvement value to be permitted without meeting the flood protection requirements for buildings located in the SFHA. LSI credits having a threshold that is lower than 50%.

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## Documentation for FDN Provided by the Community

(1) The activity documentation requirements in Section 431.d must be met.

### 432.d. Cumulative substantial improvements (CSI)

The maximum credit for this element is 90 points.

The NFIP allows improvements valued at up to 50% of the building's pre-improvement value to be permitted without meeting the flood protection requirements for buildings located in the SFHA. Over the years, a community may issue a succession of permits for different repairs or improvements to the same structure. This can greatly increase the overall flood damage potential to that building as well as the insurance liability to FEMA.

CSI provides credit to a community that ensures that the total value of all improvements or repairs permitted OVER TIME does not exceed 50% of the value of the structure. When the total value does exceed 50%, the original building must be protected according to the ordinance requirements for new buildings.

Under some circumstances the NFIP flood insurance policy may pay a portion of the cost of bringing a substantially flood-damaged building into compliance with the community's floodplain management ordinance. If the community has a more restrictive definition of substantial damage, the provision may still apply. More information on Increased Cost of Compliance coverage can be found at [www.CRSresources.org/400](http://www.CRSresources.org/400).

If a community does not regulate for cumulative substantial improvements, it may still receive credit for regulation of additions. Additions within the footprint of the original building would have to be to a floor above the base flood elevation. Additions outside the footprint of the original building would have to be elevated (non-residential structures could be floodproofed) above the base flood elevation.

#### **Credit Points for CSI**

Up to 90 points are provided for tracking improvements cumulatively.

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CSI = the total of the following points, not to exceed 90 points

(1) EITHER:

- (a) 40 points, if the regulations require that improvements, modifications, and additions to existing buildings are counted cumulatively for at least 10 years

OR

- (b) 20 points, if the regulations require that improvements, modifications, and additions to existing buildings are counted cumulatively for at least 5 years

(2) EITHER:

- (a) 40 points, if the regulations require that reconstruction and repairs to damaged buildings are counted

### 113.a. Credit Points and Classification

A community receives a CRS classification based upon the total credit for its activities. There are 10 CRS classes. Class 1 requires the most credit points and gives the greatest premium reduction or discount. A community that does not apply for the CRS, or does not obtain the minimum number of credit points, is a Class 10 community and receives no discount on premiums. The qualifying community total points, CRS classes, and flood insurance premium discounts are shown in Table 110-1.

Table 110-1. CRS classes, credit points, and premium discounts.			
CRS Class	Credit Points (cT)	Premium Reduction	
		In SFHA	Outside SFHA
1	4,500+	45%	10%
2	4,000–4,499	40%	10%
3	3,500–3,999	35%	10%
4	3,000–3,499	30%	10%
5	2,500–2,999	25%	10%
6	2,000–2,499	20%	10%
7	1,500–1,999	15%	5%
8	1,000–1,499	10%	5%
9	500–999	5%	5%
10	0–499	0	0

*SFHA: Zones A, AE, A1–A30, V, V1–V30, AO, and AH*  
*Outside the SFHA: Zones X, B, C, A99, AR, and D*

*Preferred Risk Policies are not eligible for CRS premium discounts because they already have premiums lower than other policies. Preferred Risk Policies are available only in B, C, and X Zones for properties that are shown to have a minimal risk of flood damage.*

*Some minus-rated policies may not be eligible for CRS premium discounts.*

*Premium discounts are subject to change.*