



---

# MEMORANDUM

---

Date: November 19, 2019

To: The Honorable Chairman and Members  
Pima County Board of Supervisors

From: C.H. Huckelberry  
County Administrator

A handwritten signature in black ink, appearing to be "CHH", is written over the printed name "C.H. Huckelberry".

Re: **Repetitive Flood Loss Properties and Areas**

The National Flood Insurance Program's Community Rating System requires the Regional Flood Control District (RFCD) to provide notice to those properties who have experienced more than one flood insurance claim in any 10-year period. The frequency of loss classifies a property as a Repetitive Loss Property/Area and requires the RFCD to inform owners of flood risk and provide guidance on mitigation techniques.

The attached November 15, 2019 memorandum from the RFCD explains this subject in more detail. The letters will be mailed to approximately 75 property owners near Tanque Verde Creek, Sabino Creek and the Fortyniners Estates subdivision.

CHH/anc

Attachment

c: Carmine DeBonis, Jr., Deputy County Administrator for Public Works  
Suzanne Shields, Director, Regional Flood Control District

**DATE:** November 15, 2019

**TO:** C. H. Huckelberry  
County Administrator

**FROM:** Suzanne Shields, P.E.  
Director



**SUBJECT: Repetitive Loss Properties and Repetitive Loss Areas Outreach Letters**

Each year, as part of Pima County's participation in the National Flood Insurance Program's Community Rating System, the Regional Flood Control District (District) sends letters to the owners of property that have experienced repetitive losses due to flooding. Repetitive Loss Properties are those parcels that have received more than one flood insurance claim in a 10-year period.

The purpose of these letters (examples attached) is to inform the owners of the flood risk and provide guidance on mitigation techniques that they can employ before and during times of flooding in addition to informing owners of the programs to mitigate the flooding issue(s) and to invite them to talk to us to discuss mitigation solutions. In addition and concurrent with the distribution of the Repetitive Loss Property letters, the District sends letters to the owners of property within Repetitive Loss Areas. Repetitive Loss Areas are those properties near a Repetitive Loss Property that are subject to similar flooding risks and conditions.

There are six Repetitive Loss Properties in unincorporated Pima County, three of them are associated with the Tanque Verde Creek and are in the Fortyniners Estates Subdivision, one is associated with Sabino Creek, one is associated with the Finger Rock Wash, and one is associated with non-regulatory flow. The Repetitive Loss Area letters for Tanque Verde Creek will be sent to 68 additional properties and for Sabino Creek will be sent to 2 additional properties.

This year the District will be including an Emergency Response Plan Guide to help owners create an emergency response plan for protecting their home, their business, and their families. This fact sheet was developed using resources available from the Red Cross and the Federal Emergency Management Agency.

Please direct any calls or comments you may receive to our office.

SS/JVC/tj

Attachments

c: Carmine DeBonis, Deputy County Administrator – Public Works  
Eric Shepp, Deputy Director – Regional Flood Control District  
Greg Saxe, Environmental Planning Manager – Regional Flood Control District  
Joseph Cuffari, Program Coordinator – Regional Flood Control District



DATE

NAME

ADDRESS

Tucson AZ ZIP

**Re: Annual Notification to Repetitive Loss Property**

Dear NAME:

This is Pima County's annual mailing on information regarding flood safety, preparedness, and property protection. This letter is a simple reminder that your property is within an area subject to flood hazard and potential flood loss. The Federal Emergency Management Agency (FEMA) lists the above address as a Repetitive Loss Property in Pima County, meaning it has been subject to more than one loss due to flooding during a 10-year period.

FEMA administers the National Flood Insurance Program (NFIP) that was designed to reduce flood losses through local floodplain management and to provide federally backed flood insurance. Under the Community Rating System (CRS), there is an incentive for communities to do more than meet the minimum NFIP requirements by helping citizens prevent or reduce flood losses. The result of the County's effort is that Pima County residents receive up to a 25% insurance discount.

Attached is a parcel map showing that your property is in a FEMA Special Flood Hazard Area. Also attached is information on Increased Cost of Compliance (ICC) coverage, which supplements a flood insurance claim payment by providing up to \$30,000 to elevate, flood proof, rehabilitate to meet current code, demolish, or relocate a building that has been repetitively damaged. This information may be of special interest after the latest flood.

You may stop by our office to review the latest FEMA floodplain information and learn about safe construction methods that may reduce flood insurance premiums, retrofitting measures for residential structures and potential future flood control measures by Pima County. If you have any questions, please contact me at 724-4600.

Sincerely,

Greg Saxe, CRS Coordinator

Cc: File Attachments



Date

Name

Address

Tucson, AZ ZIP

**Re: Annual Notification to Repetitive Loss Areas**

Dear Name:

You have received this letter because your property is in a Repetitive Loss Area that has been identified by the Regional Flood Control District (District). A Repetitive Loss Area is a portion of the community that contains Repetitive Loss Properties (properties that have two or more claims within a ten year period that have been paid by the National Flood Insurance Program) and nearby properties that have similar flooding conditions. Our community is concerned about repetitive flooding and has an active program to help you protect yourself and your property from future flooding, but here are some things you can do:

- 1) Know your flood hazard:
  - a. Check with the District on the extent of past flooding in your area. District staff can tell you about the causes of repetitive flooding, and what would be appropriate measures to protect your improvements from flooding.
  - b. Request a visit by District hydrologists to discuss flood protection alternatives on your property.
  
- 2) Prepare for flooding by doing the following:
  - a. Know how to shut off electricity and gas to your house when a flood occurs
  - b. Make a list of emergency numbers and identify safe places to go
  - c. Make a household inventory list of important items
  - d. Put insurance policies, valuable papers, medicine, etc., in a safe place
  - e. Collect and put cleaning supplies, camera, waterproof boots, etc., in a handy place
  - f. Develop a disaster response plan. A helpful guide to creating a response plan is attached.
  - g. Get a copy of *Repairing Your Flooded Home*. The District has copies, or it can be found on [www.redcross.org](http://www.redcross.org)
  
- 3) Consider some permanent flood protection measures:
  - a. Mark your fuse or breaker box to show the circuits for floodable areas. Turning off the power to a basement or lower level area can reduce property and structural damage, as well as help protect lives.
  - b. Check your structure for water entry points, such as windows or vents. These can be protected with low walls or temporary shields
  - c. Install a flood drain plug, standpipe, or overhead sewer, or sewer backup valve to prevent sewer backup flooding

---

Suzanne Shields, P.E., Director

201 N. Stone Avenue, 9th Floor, Tucson, Arizona 85701-1207 • Phone: 520-724-4600 • Fax: 520-724-4621



## Mitigation Reduces Future Flood Damage

Is your building insured through the National Flood Insurance Program (NFIP) with a Standard Flood Insurance Policy (SFIP)? If so, you may be eligible for up to \$30,000 in Increased Cost of Compliance (ICC) coverage. ICC will help cover the costs of meeting the community's rebuilding requirements that will protect your home from future flood damages.

ICC coverage can help to pay the cost of one or any combination of these four mitigation activities.



**Elevate** above the flood level required by your community



**Relocate** to a new site, preferably out of the floodplain



**Demolish** the building



**Dry floodproof** the building (primarily non-residential)

Your insurance carrier and community building department can help you to determine your ICC eligibility and the documentation you will need.



## ICC Helps Reduce Future Flood Damage

Flooding badly damaged John Smith's \$200,000 home. After John **reported his flood loss to his insurance carrier**, an assigned adjuster inspected the property and said he may be eligible to receive ICC and should talk to his community building department.

John contacted the **community building department** and **after an inspection of the home, it was declared substantially damaged**. John and the building department jointly decided elevating his home was the best way to meet the local floodplain rebuilding requirements and reduce future flood damage.

John provided the substantial damage letter he received from his community building department to the insurance carrier. After **the insurance carrier verified that the flood damages equaled at least 50 percent of the pre-flood market value, John qualified to receive ICC**. After submitting a signed contract for the work, a building permit from the building department, and a signed ICC Proof of Loss form, **John was ready to elevate his home\***.

*\*Check with your insurance carrier to determine if you are able to receive a partial payment to help with the initial mitigation activity costs.*

For more information about the NFIP, flood insurance, and ICC, contact your insurance carrier or visit [www.FloodSmart.gov](http://www.FloodSmart.gov).



National Flood Insurance Program

# Increased Cost of Compliance Coverage

Reduces Future Flood Damages



FEMA

## What is Increased Cost of Compliance (ICC)?

ICC coverage is included under the National Flood Insurance Program (NFIP) Standard Flood Insurance Policy (SFIP). ICC helps policyholders with the costs incurred if they are required by the community building department to meet rebuilding standards after a flood.

ICC coverage provides up to \$30,000 to help pay for relocating, elevating, demolishing, and floodproofing (non-residential buildings), or any combination of these mitigation activities.

The ICC portion of the claim is handled separately from the building and/or contents portion of the claim. However, the combination of payments cannot exceed the maximum coverage limits available through the NFIP. For example, a policyholder cannot receive more than \$250,000 in claim payments for a residential building.

## Are You Eligible to File a Claim for ICC?

Yes, if:

- 1) You have an NFIP flood insurance policy; and
- 2) Your community building department determines your home is substantially or repetitively damaged by flooding; and
- 3) The flood damage to your home is equal to 50 percent of the pre-flood market value.

*“Substantially damaged”* means damages of **any** origin sustained by a structure whereby the cost of restoring the structure to its before damaged condition would equal or exceed 50 percent of the market value of the structure before the damages occurred.

*“Repetitively damaged”* means the building must have flood damage on at least two occasions during a 10-year period; the cost of which to repair the flood damage, on average, equaled or exceeded 25 percent of the market value of the building on each occasion.

## Starting the ICC Claims Process after a Flood



1. If your community building department determines your structure is substantially or repetitively damaged, discuss what mitigation activities will be required to rebuild in the floodplain and if any grants may be available.



2. Promptly contact your insurance carrier to file a claim for ICC and document the loss (photographs, etc.) Do not begin minor repair work before filing an ICC claim.



3. Submit to your insurance carrier the letter from your community building department declaring the building substantially or repetitively damaged, a signed contract for the mitigation activity, and the building permit that documents rebuilding requirements in the floodplain.



4. The insurance carrier will verify that the flood damage to your building equals at least 50 percent of the pre-flood market value, which is required to start the ICC claim.

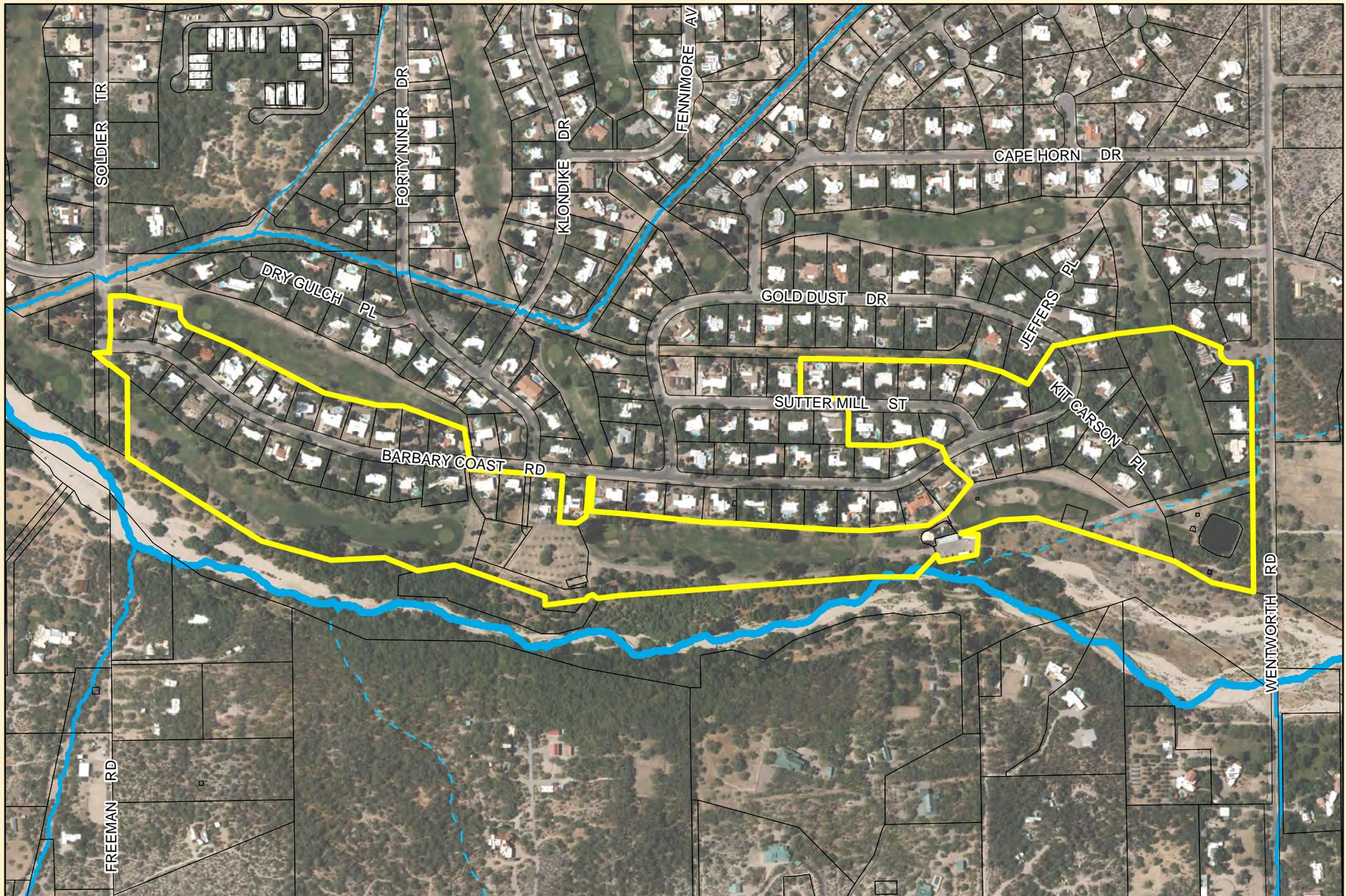
## Where to Get More Information

For more information about the ICC claim process, visit [www.FEMA.gov/Increased-Cost-Compliance-Coverage](http://www.FEMA.gov/Increased-Cost-Compliance-Coverage), contact your insurance carrier, or your State NFIP Coordinator (<http://www.floods.org/>).

## Things to Remember about ICC

- After it has been determined which mitigation activity you will be taking, contact your insurance carrier to file a claim for ICC. An adjuster will be assigned to you.
- Your adjuster will ask you to submit your substantial damage letter and building permit from the community building department, a copy of a signed contractor bid for the work, and a signed ICC Proof of Loss form, which the adjuster may provide to you as a courtesy.
- Before you begin the work, check with your insurance carrier to see if you are able to receive a partial payment to help cover some of the initial construction costs.
- After the work is completed, your community building department will provide written evidence the work meets the floodplain management regulations. Submit this to your insurance carrier to receive a full or remaining partial ICC payment.
- If necessary, your community building department may also be able to use ICC to supplement Federal or state grant funding for your elevation, demolition, relocation, or floodproofing (non-residential buildings).





\\rfcd\gislib\projects\imdxavi\mxd\Greg\FEMA\_Study\2016\_Repetitive\_Loss.mxd



Pima County Regional Flood Control District  
 201 N. Stone Ave - 9th Floor  
 Tucson, Arizona 85701-1797  
 (520) 724-4600, FAX: (520) 724-4621  
<http://www.rfcd.pima.gov>

# Repetitive Loss Area 1

-  Repetitive Loss Area
-  Parcels

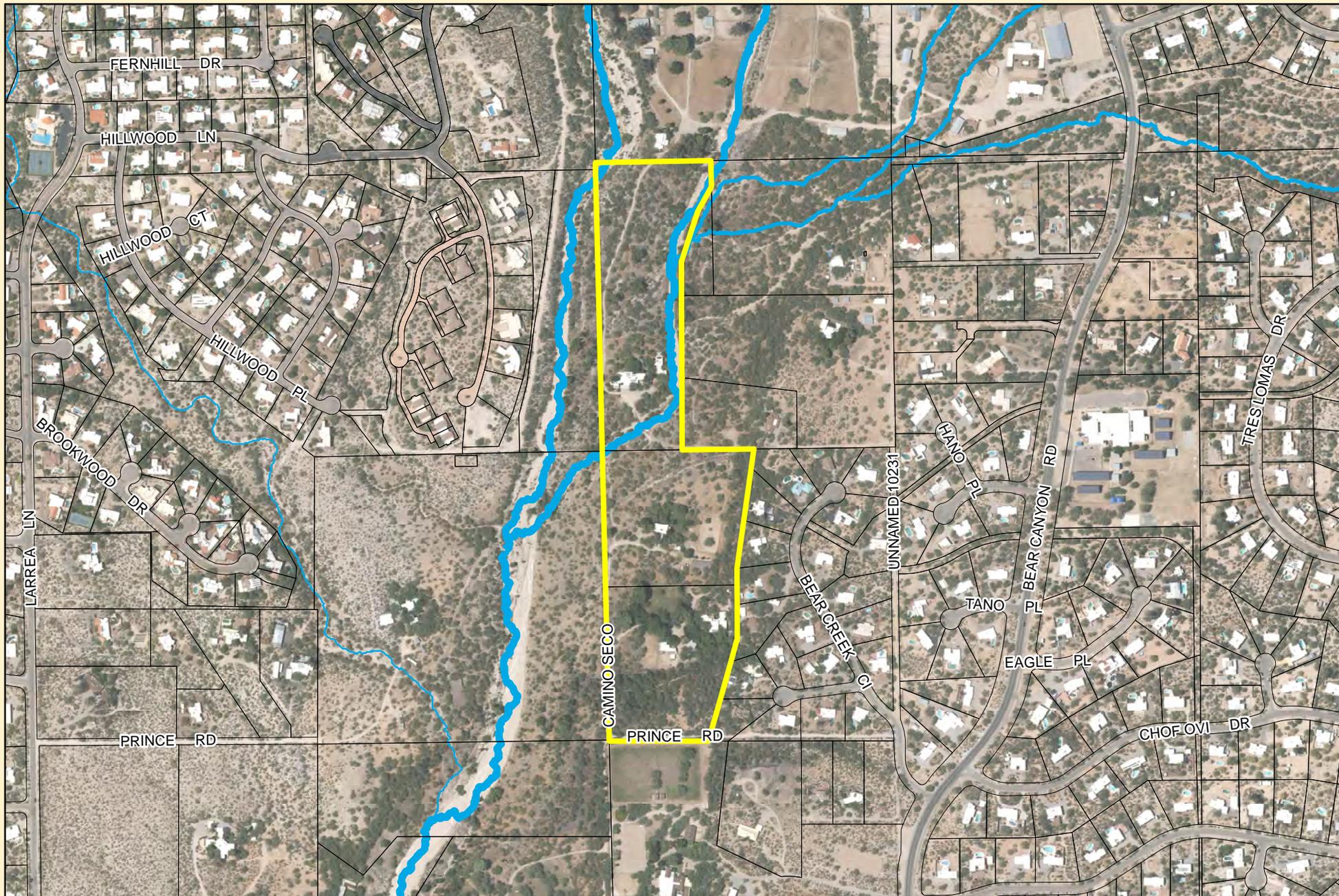


1 inch = 600 feet

Date: 4/13/2016

The information depicted on this display is the result of digital analyses performed on a variety of databases provided and maintained by several governmental agencies. The accuracy of the information presented is limited to the collective accuracy of these databases on the date of the analysis. The Pima County Regional Flood Control District makes no claims regarding the accuracy of the information depicted herein.

This product is subject to the GIS Division Disclaimer and Use Restrictions.



\\rfcd\gislib\projects\imdxavi\mxd\Greg\FEMA\_Study\2016\_Repetitive\_Loss.mxd



Pima County Regional Flood Control District  
 201 N. Stone Ave - 9th Floor  
 Tucson, Arizona 85701-1797  
 (520) 724-4600, FAX: (520) 724-4621  
<http://www.rfcd.pima.gov>

# Repetitive Loss Area 2

1 inch = 600 feet

- Repetitive Loss Area
- Parcels



Date: 4/13/2016

The information depicted on this display is the result of digital analyses performed on a variety of databases provided and maintained by several governmental agencies. The accuracy of the information presented is limited to the collective accuracy of these databases on the date of the analysis. The Pima County Regional Flood Control District makes no claims regarding the accuracy of the information depicted herein.

This product is subject to the GIS Division Disclaimer and Use Restrictions.



## Emergency Response Plan Guide

There are a lot of great examples on the internet to help you create an emergency response plan. We'll highlight a few from respected sources and give you some flood specific tips for you to include in your plan for your home or business. Go to <http://www.pima.gov/FloodAlerts/> for additional resources to help you create your plan.

### For Your Home

- Flood waters can arrive very quickly on desert washes, so it's important to have a "Go Kit" handy at all times in case you need to evacuate at a moment's notice. Keep water, shelf stable food, a flashlight, spare phone charger and other essentials in it at all times, then add things like medications to it when you have to evacuate.
- Don't forget to include pet supplies in your Go Kit.
- Establish a family rallying point well outside the floodplain. Make sure there is a safe travel route from your home, work, or school to that location so that everyone can get there.
- Establish a reliable person outside your immediate area for everyone to contact and relay messages through in case phone systems are down or someone's cellphone battery dies. Make sure everyone memorizes the email and phone number of your designated contact person.
- Have sandbags handy. You can also search "sandless sandbags" for other alternatives that may work better for you.

### For Your Business

- Have a plan for closing the business down in an emergency.
- Keep a list of employee phone numbers and let them know when not to come to work due to flooding.
- Make sure employees establish safe travel routes to and from work in times of flooding.
- Your plan should include being prepared for employees remaining at work until it is safe to leave.
- Have sandbags handy. You can also search "sandless sandbags" for other alternatives that may work better for you.

### Medical Care, Assisted Living, Child Care, Utilities, or other Critical Facility

There are special considerations for medical facilities, assisted living facilities, schools, day care facilities, or other locations considered to be vital in an emergency, like utilities providers.

- If your facility includes individuals who will not be self-sufficient in an emergency (patients, elderly, children), make sure to discuss your plan with the Office of Emergency Management. They will need to know how many people may need assistance and what kind of assistance will be needed.
- Utility companies should have a continuity of operations plan.

### Internet Resources

The District recommends looking at each of the resources below and picking one that works best for you.

Ready.gov – <https://www.ready.gov/make-a-plan>

Red Cross – <https://www.redcross.org/get-help/how-to-prepare-for-emergencies/make-a-plan.html>

FEMA – <https://www.fema.gov/media-library/assets/documents/89518>