



P.O. Box 1326
Trenton, New Jersey 08607

Honorable Chris Christie
Office of the Governor
PO Box 001
Trenton, NJ 08625



June 27, 2013

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Office of the Governor
PO Box 001
Trenton, NJ 08625

**Re: Request to Veto S2680: Development on Piers in Coastal High Hazard Areas
Inconsistencies with Building Code/ASCE 24 and the National Flood Insurance Program**

Sent by mail; email: chris.christie@gov.state.nj.us; and
Facsimile: 609-777-2922, 609-292-5212 and 609-292-3454

Dear Governor Christie:

S2680 was passed by the Assembly on June 24, 2012, and the Senate today and is now headed to your desk for consideration. The New Jersey Association for Floodplain Management (NJAFM) respectfully asks you to veto the bill due to inconsistencies with building codes and the National Flood Insurance Program (NFIP). More importantly, NJAFM is especially concerned about resulting infrastructure damage, public safety and safety of first responders in attending to evacuees, if development is permitted in the FEMA Flood Insurance Rate Map V-zones. NJAFM strongly suggests that permitting more high risk development is not an appropriate response to New Jersey's flood history, now the third state in the nation with NFIP claim dollars paid at over \$5 billion including Hurricane Sandy. The NJAFM is greatly concerned that this legislation may very well result in noncompliant rebuilding, jeopardizing the eligibility of every New Jersey community to remain in the NFIP.

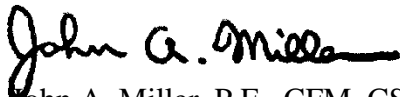
The New Jersey Association for Floodplain Management (NJAFM)¹, incorporated in 2005, is dedicated to reducing loss of life and property damage resulting from floods and promoting sound floodplain management at all levels of government. Our membership consists of, but is not limited to, public officials; first responders; local, state and federal agency employees; public and private engineers and planners, and floodplain managers. The New Jersey Association for Floodplain Management is one of 35 Chapters of the national Association of State Floodplain Managers (ASFPM) – our membership of over 250 professionals are among the 15,000 national and state members of the collective ASFPM that are engaged in protecting the public and its property. NJAFM has been assisting Director Ferzan and his office on complex issues following Hurricane Sandy and our organization has worked with prior administrations on addressing New Jersey's vulnerability to flooding since our inception. I was honored to be a member of your Passaic River Basin Flood Advisory Commission issuing our recommendations to you in January 2011.

¹ www.njafm.org

The NFIP in the Code of Federal Regulations (CFR) 44 Sec. 60.3(e) and the Uniform Construction Code (UCC) by reference to ASCE 24 Sec. 4.3(1) require that all new construction and substantial improvements within Zone V must “be located landward of the reach of mean high tide.” Importantly, ASCE 24 requires the same limit in the Coastal A zones (1.5 to 3-foot waves) now shown on New Jersey coastal mapping. FEMA, in consultation with your office, issued Preliminary work maps for four counties including Hudson County that dramatically reduced V-zone areas, and thus, eliminating part of the impetus for the legislation.

NJAFM has been complimentary to your preparation and response to Hurricane and gave you praise for adopting the Advisory Base Flood Elevation maps; we know that was not an entirely popular decision. We look forward to working with your administration to promote sound flood policy, risk awareness, professionalism and sustainable floodplain management now and into the future.

On behalf of the Association,



John A. Miller, P.E., CFM, CSM
Legislative Committee Chair
Certified Floodplain Manager

c: Honorable Marc Ferzan, Director GORR, by email: marc.ferzan@gov.state.nj.us
Mr. Terrence Brody, Deputy Director GORR, by email: Terrence.Brody@gov.state.nj.us
Ms. Amy Cradic, Senior Policy Advisor, Office of the Governor, by email: amy.cradic@gov.state.nj.us
NJAFM Board by email