



## **Substantial Damage and Substantial Improvement Town Hall Discussion Points**

The Community Rating System (CRS) is a voluntary program that encourages communities to implement floodplain management practices that reduce the risk of flooding. The goal of the CRS is to increase the number of communities that take effective measures to increase their flood resilience. Hernando County joined the CRS Program on April 17, 1984. As a benefit, participation in CRS gives the community discounted Flood premiums with the National Flood Insurance Program (NFIP).

When homeowners buy subsidized flood insurance from the Federal Emergency Management Agency, they make a commitment to build back better after flood disasters. FEMA's 50% rule stipulates that if a home in a flood zone suffers damages worth more than half its market value for the structure, it must be torn down and rebuilt so it's elevated above flood level.

Enforcement of the 50% rule largely falls to local officials in flood-damaged regions, who are charged with ensuring that their citizens aren't rebuilding in flood zones. In exchange for this diligence, the federal government subsidizes low-cost flood insurance for homes in communities that certify their compliance with the rule. The 50% rule is supposed to reduce this risk over time by ensuring that flood-prone homeowners don't rebuild the same vulnerable properties over and over. If a county determines that a home has suffered what FEMA calls "substantial damage," it requires the homeowner to replace the home with a new home elevated above flood level (BFE plus one (1) foot, explained herein), often on concrete pilings. If a county doesn't comply, FEMA could remove the County from the CRS Program. Much of the confusion stems around determining what counts as "substantial damage". Local officials conduct basic "damage assessments" in the first days after a storm, logging damage information that they can see from the street as they clear debris.

### **Additional information:**

**Appendix A:** Costs for Substantial Improvements and Repair of Substantial Damage

**Appendix B:** What is National Flood Insurance Program (NFIP)

**Appendix C:** Hernando County Comprehensive Plan

### **1. How does the 50% rule benefit me and why did the State and BOCC adopt it?**

The flood load and flood-resistant construction requirements outlined in the Florida Building Code are designed to establish minimum standards that protect public health, safety, and welfare. These requirements aim to reduce both public and private losses due to flooding by regulating development in flood hazard areas. Specifically, the goals are to: 1. Minimize disruptions to commerce, access, and public services during flooding events. 2. Ensure the use of appropriate construction practices to prevent or reduce future flood damage. 3. Regulate activities such as filling, grading, dredging, mining, paving, excavation, drilling, and material storage that may increase flood risk or erosion potential. 4. Manage the alteration of flood hazard areas, watercourses, and shorelines to protect the natural functions of the floodplain. 5. Minimize damage to public and private infrastructure and utilities. 6. Help maintain a stable tax base by promoting sound development practices in flood hazard areas. 7. Reduce the need for future public expenditure on flood control measures and emergency response efforts. 8. Ensure compliance with the National Flood Insurance Program (NFIP) requirements for county participation, as set forth in Title 44 of the Code of Federal Regulations, Section 59.22. These measures are essential to safeguarding communities from the impacts of flooding while encouraging responsible development in flood-prone areas.

**2. What is the 50% rule?**

The 50% Rule is a regulation of the National Flood Insurance Program (NFIP), established in 1968, that prohibits improvements to a structure exceeding 50% of its **market value** unless the entire structure is brought into full compliance with current flood regulations. This may include elevating the structure, using flood-resistant materials, and proper flood venting among others.

**3. What is Substantial Improvement and Substantial Damage?**

Any combination of repair, reconstruction, rehabilitation, addition, or other improvement of a building, the cumulative cost of which equals or exceeds 50% of the (depreciated) market value of the building or structure before the improvement or repair is started. If a project meets the definition of *Substantial Improvement* or *Substantial Damage* it is considered new construction, and the entire building must be elevated to or above the Base Flood elevation (BFE) and otherwise made fully flood compliant.

**4. Why is it important to know if an improvement is "substantial?"**

Exceeding the Substantial Improvement threshold requires the entire structure to be brought into compliance with current NFIP regulations, the Florida Building Code, and the Hernando County Land Development Code. This may include elevating the structure at or above BFE, flood proofing it, installing proper flood venting, and using flood-resistant construction materials.

**5. What types of structures does the "50% Rule" apply to?**

- a. All existing structures: Those that were present the year (1984) that the NFIP floodplain management and Flood Insurance Rate Maps were adopted in Hernando County as well as those structures built earlier.
- b. New construction: Substantially improved structures must meet the floodplain management regulations and BFE effective at the time the permit is approved.
- c. Non-compliant structures erected prior to 1984 may remain so unless they are substantially improved. These structures are evaluated on a case-by-case basis.

**6. Will permits be issued for a "Substantial Improvement?"**

Yes, provided the plans demonstrate the entire structure is being brought into compliance. A Repair Improvement Cost Form must be submitted, reviewed, and approved prior to the building permit being approved.

**7. What is Market Value?**

The price at which a property will change hands between a willing buyer and a willing seller, neither party being under compulsion to buy or sell and both having reasonable knowledge of relevant facts. Hernando County determines market value in the following ways:

- d. Utilize the Hernando County Property Appraiser's assessment for ad valorem taxation for the (depreciated) market value for the structure only.
- e. An independent appraisal for the structure only prepared and certified by a Florida Licensed Appraiser.

**8. Where can I find the value of the structure on the Hernando County Property Appraiser's Website?**

Go to: <https://propsearch.hernandopa-fl.us/>. Provide the property address or Parcel Key. Please remember that the NFIP basis for substantial improvements is **based only on the market value of the structure and does not include land values.**



**9. I don't agree with the Property Appraisers Market Value assessment on my structure. Can I contest the value?**

Yes. A property owner may provide a private appraisal for the property based on its pre-storm conditions.

**10. Can replacement cost be substituted for market value to determine substantial improvement or damage?**

No, replacement cost is the cost of replacing the structure (to pre-storm conditions) with a structure of like kind, using present day costs for labor and materials. Replacement cost is often much greater than market value.

- A Substantial Damage/Improvement Estimate Form is required to be submitted with all permit applications so that a substantial Improvement determination can be made.

**11. Do maintenance projects count toward the 50% calculation?**

Yes, maintenance projects of any type are logged toward the 50% rule.

**12. Can I enclose the area underneath my home and make it into a habitable space?**

No, if the enclosed area is located below the base flood elevation, this area can only be used strictly for storage, parking, and building access. Utilities are prohibited in these spaces, and they cannot be air conditioned.

**13. Is Substantial Improvement cumulative?**

Hernando County does not have cumulative. However, a storm event would require that all permits related to storm repair would be subject to the 50% rule. The definition of "substantial improvement" involves: "Any repair, reconstruction, rehabilitation, addition, or improvement of a building or building, the cost of which equals or exceeds 50 percent of the market value of the building before the improvement or repair, is started."

**14. How is the value of an improvement determined?**

Hernando County uses a Substantial Damage/Improvement Estimate Form which must be completed, by the contractor or the owner-builder, and submitted with the permit application to determine if a project can be completed under the 50% threshold. This form must also include copies of the construction contract and any subcontractor bids. The County will evaluate the cost of improvements and determine if they are fair and reasonable. The cost of improvement includes the total costs for repair, reconstruction, rehabilitation, additions, or other improvements to the structure. These costs include all materials, labor, built-in appliances, overhead, profit, demolition, and repairs made to the structure. The application must be reviewed and approved prior to building permit approval and commencement of work.

**15. Is the cost of an improvement discounted if the owner does the work or the materials are donated?** No, the value placed on materials must equal the actual or estimated cost. The value placed on labor must be estimated based on applicable hourly wage scales for the type of construction work. Improvement costs cannot be discounted to keep the cost estimate below 50%.

**16. Are there any items that can be excluded from the cost of improvement?**

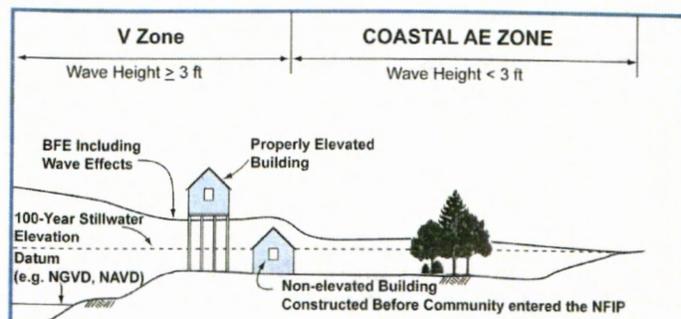
Items that should not be counted toward the cost of repair include clean up and trash removal, cost to temporarily stabilize a building so that it is safe to enter to evaluate required repairs, plans, specifications, surveys, building permits, and other items separate from or incidental to the repair or improvement of the structure such as outdoor landscaping. Improvements to the land, such as driveways, pools, seawalls, etc. are not included in the 50% Rule value.

**17. How do I find out the required BFE of my property and what does it mean?**

You can call the Hernando County Zoning Department at 352-754-4048 or you can look on the Flood Insurance Rate Map (FIRM) that are listed on the County's website at: <https://portal.hernandopa-fl.us/portal/apps/webappviewer/index.html?id=c85225824549433ea77cbcd90ce2edfa>. FEMA flood maps: <https://www.fema.gov/flood-maps>.

Base Flood Elevation (BFE), is the 1% annual chance of flooding. The 1% annual chance of flood is one that has a 1% (1 out of 100) chance of occurring in any given year. The base flood is also informally referred to as the 100-year flood and is the national standard used by the NFIP and all Federal agencies for the purposes of requiring the purchase of flood insurance.

**18. What are the flood zones within the County?**



**AE Zone** – the AE Zones have a BFE established on the FIRM and are areas that are susceptible to lower wave heights.

**VE Zone** – The VE zones, also known as Velocity zones or Coastal High Hazard Areas, are in the coastal area along the Gulf of Mexico. These areas have a BFE established on the FIRM and are areas that are susceptible to wave action and quickly rising floodwaters during a storm.

**19. Why should an owner suffer what seems to be a penalty for upgrading and/or improving a structure?**

The underlying principle for counting extra costs associated with the more expensive materials, labor or design is the added real property that would be at risk to flood damage. It should be noted that in some form, the Federal Government (NFIP, FEMA, or various disaster assistance programs) would likely be obligated to pay a portion of or all future damage to these more expensive improvements. In addition, structures located in a SFHA that are not elevated to or above the BFE pose threats to the health and safety of the occupants of these structures. Over time it is not only important to protect the property of the existing structures through substantial improvement, but also protect the health and lives of the people that occupy them.

**20. What if the Hernando County did not participate in the NFIP?**

There are several consequences if the County did not participate. The largest is the unavailability of affordable flood insurance for residential or commercial buildings within the County. In addition, there would be no Federal grants, loans, mortgage insurance, or federal disaster assistance for structures in the SFHA. Owners of buildings with conventional loans would also be required to notify buyers or lessees that the property is in a SFHA and Federal disaster relief is not available to them in the event of a declared disaster.

**21. What is Substantial Damage**

Damage of any origin sustained by a building or structure whereby the cost of restoring the building or structure to its before-damaged condition would equal or exceed 50 percent of the market value of the building or structure before the damage occurred. The term also includes flood-related damage sustained by a structure on two separate occasions during a 10-year period for which the costs of repairs at the time of each such flood event, on average, equals or exceeds 25 percent of the market value of the structure before the damage occurred. The flood regulations for the renovation of a substantially damaged structure are the same as those for one that is substantially improved.

**22. What happens when a structure is damaged, but not substantially, and during the repair the owner also makes an addition, rehabilitation, or other improvements to the structure?**

If the owner of a building, which was 30% damaged by flood, decides to add a room during the repair process for the flood damage, the combined total of these improvement must be equal to or less than 50% of the structures pre-damaged market value to **not** be considered a substantial improvement.

**23. What if a property owner refuses to adhere to the Federal Flood Regulation process for permitting and/or reporting Substantial Damage?**

The owner/contractor would be issued a stop work order, a notice of violation, and could incur a daily fine at a rate \$1,000 per day, per Section 2-49 of the Hernando County Code. The violation would be taken to a magistrate for compliance.

**24. What are the potential long term consequences of failing to comply?**

If the community has exhausted legal means to remedy a violation and the owner refuses to resolve the matter and bring the building into compliance, the community may cite the structure as a violation in accordance with Sec. 1316 of the National Flood Insurance Act of 1968. This provision allows the NFIP to deny flood insurance on the building that remains in violation, and on all other insurable buildings on the property. Owners who refuse to resolve violations should be informed that denial of flood insurance can have **significant consequences: the property**

**may be difficult to sell; the owner may have problems with the mortgage lenders if flood insurance cannot be maintained; and future Federal disaster assistance may be denied.**

A community's standing in the NFIP depends on making a good faith effort to successfully resolve violations. By allowing a violation to go unresolved, the community may set a precedent, making it more difficult to take future enforcement actions and potentially jeopardize participation in the NFIP.

**25. What if I began working on after storm repairs on my structure without a permit?**

In the event a property has begun storm repairs, they may contact the Hernando County Building Department for an inspection to review damage and may also apply for an "After the Fact" permit without penalty.

**26. How long do I have to report and complete any substantial damage to my structure?**

180 calendar days from the storm event

Storm Date: Helene-September 27, 2024      180 Calendar Days = March 26, 2025

Storm Date: Milton-October 9, 2024      180 Calendar Days = April 7, 2025

**27. What if I want to be my own General Contractor, is that allowed and can I use sub-contractor estimates as a basis of loss?**

Yes, you can do both. However, any work done by the owner still needs to be included showing material cost and labor performed. You can use the FEMA SD Estimator tool, <https://www.fema.gov/emergency-managers/risk-management/building-science/substantial-damage-estimator-tool>. Department of Labor, <https://www.bls.gov/news.release/eci.nr0.htm>.

**28. My insurance company has already started repairs.**

A permit would still be required for the completed repairs along with a substantial damage packet.

**29. What if I select to not acquire NFIP coverage and/or elect to purchase a commercial flood policy?**

Without flood insurance, you could face significant out-of-pocket costs if your property is flooded. For example, FEMA estimates that the cost to repair a 1,000 SQ. FT. home after three (3) inches of floodwater is around \$12,000. **Lender requirements** - If you have a mortgage from a federally regulated lender, you may be required to obtain flood insurance. If you don't, your lender may purchase insurance on your behalf. **Community sanctions** - If your community doesn't participate in the NFIP, residents may not be able to purchase flood insurance, and existing policies may not be renewed. Communities that don't participate may also be excluded from federal grants, loans, and disaster assistance. You can purchase flood insurance from your insurance company or agent. There are also lower-cost Preferred Risk Policies for properties in areas with moderate-to-low flood risk.

**30. What happens if the community does not comply?**

Communities that don't carry out or enforce SDDs could lead to loss of a Community Rating System (CRS) discount, probation, or even suspension from the NFIP. The latter would mean that residents of that community would be ineligible for certain federal funds (see FEMA guidance on Flood Insurance and FEMA Assistance). Some communities in south Florida are currently facing probation related to failure to enforce local floodplain requirements.

**31. What happens if I don't comply with pulling permits, etc.**

If you don't pull a permit to repair a substantially damaged home after a storm, you could face

finances, penalties for violating building codes, potential delays in insurance claims, and in extreme cases, may be forced to demolish the improperly repaired building, especially if the damage falls under FEMA's "50% rule" which requires significant repairs to comply with current flood zone standards if the damage exceeds half the home's market value; this could also impact your ability to sell the property in the future.

**32. What are Local officials responsible for?**

Reviewing the validity of all cost estimates provided by applicants, whether prepared by licensed contractors, engineers, architects, professional cost estimators, or property owners. Local officials should also inspect damaged buildings and manufactured homes to verify that the proposed costs include all work necessary to restore the buildings to pre-damage conditions. The main things local officials have to do are to:

- Determine the market value of the building by using the Property Appraiser market value.
- Determine the cost of work to fully repair the building
- Make substantial damage or substantial improvement determinations
- Communicate the results of substantial damage or substantial improvement determinations to property owners
- Require owners to obtain permits to bring substantially damaged or substantially improved buildings into compliance with current floodplain management regulations
- Review and issue permits, conduct field inspections during construction, identify violations and unpermitted development and take enforcement action
- Collect compliance documentation and maintain this documentation

**33. I am an already "elevated home" only replacing drywall in the area below base flood elevation, do I need a permit?**

Permits are required for all development in the special flood hazard area. Chapter 13, Section 13-23 Permits Required in the Hernando County Code. When you submit your application, please write on the application that your home is already elevated and does not require a pre-inspection. The only permits required for damage below the Base Flood Elevation (BFE) are for exterior wall repairs. We are considering enclosures, both with and without breakaway walls and flood vents. (Property already complies with 50% rule since it is elevated)

**34. Who can I contact for Insurance information?**

Be call the National Flood Insurance Program (NFIP) 877-336-2627, or speak to your insurance agent.

**35. What is the Appeal process for Substantial Damage and Substantial Improvement Determination?**

The property owner has 30 days to appeal the County Substantial Damage and/or Substantial Improvement Determination. The Board of County Commissioners shall hear and decide appeals when it is alleged there is an error in any requirement, decision, or determination made by the floodplain administrator in the administration and enforcement of this chapter. Any person aggrieved by the decision of the board of county commissioners may appeal such a decision to the circuit court, as provided by Florida Statutes.

**36. What if I received money from FEMA?**

If you receive FEMA money for your building, there may be a stipulation that you must carry flood insurance for life. Please verify with FEMA before accepting any monies.

**37. Do I need a permit for cleanup?**

The County does not require a permit for clean-up, debris, and muck removal.

**38. What is the Permitting Process?**

The purpose of the pre-inspection is to assist homeowner and the County with processing Substantial Damage and Substantial Improvement determinations in a timely manner. If a pre-inspection is done, the permitting process should be approximately 10 business days. Without a pre-inspection, the permit review will be more cumbersome, and the permitting process should be about 20 business days. The pre-inspection helps us to verify the damage sustained to the building and compare it to substantial damage packet received with permit.

**39. Does my insurance payout determine my Substantial Damage?**

No, Substantial Damage is determined based on a detailed itemized scope of work.

## **APPENDIX A**

### **Costs for Substantial Improvements and Repair of Substantial Damage**

#### **Included Costs**

Items that must be included in the costs of improvement or costs to repair are those that are directly associated with the building. The following list of costs that must be included is not intended to be exhaustive, but characterizes the types of costs that must be included:

- Materials and labor, including the estimated value of donated or discounted materials and owner or volunteered labor
- Site preparation related to the improvement or repair (foundation excavation, filling in basements)
- Demolition and construction debris disposal
- Labor and other costs associated with demolishing, moving, or altering building components to accommodate improvements, additions, and making repairs
- Costs associated with complying with any other regulation or code requirement that is triggered by the work, including costs to comply with the requirements of the Americans with Disabilities Act (ADA)
- Costs associated with elevating a structure to an elevation that is lower than the BFE
- Construction management and supervision
- Contractor's overhead and profit
- Sales taxes on materials
- Structural elements and exterior finishes, including:
  - Foundations (e.g., spread or continuous foundation footings, perimeter walls, chainwalls, pilings, columns, posts, etc.)
  - Monolithic or other types of concrete slabs
  - Bearing walls, tie beams, trusses
  - Joists, beams, subflooring, framing, ceilings
  - Interior non-bearing walls
  - Exterior finishes (e.g., brick, stucco, siding, painting, and trim)
- Structural elements and exterior finishes (cont.):
  - Windows and exterior doors
  - Roofing, gutters, and downspouts
  - Hardware
  - Attached decks and porches
- Interior finish elements, including:
  - Floor finishes (e.g., hardwood, ceramic, vinyl, linoleum, stone, and wall-to-wall carpet over subflooring)
  - Bathroom tiling and fixtures
  - Wall finishes (e.g., drywall, paint, stucco, plaster, paneling, and marble)
  - Built-in cabinets (e.g., kitchen, utility, entertainment, storage, and bathroom)
  - Interior doors
  - Interior finish carpentry
  - Built-in bookcases and furniture
  - Hardware
  - Insulation
- Utility and service equipment, including:
  - HVAC equipment
  - Plumbing fixtures and piping
  - Electrical wiring, outlets, and switches
  - Light fixtures and ceiling fans
  - Security systems
  - Built-in appliances
  - Central vacuum systems
  - Water filtration, conditioning, and re-circulation systems

### **Excluded Costs**

Items that can be excluded are those that are not directly associated with the building. The following list characterizes the types of costs that may be excluded:

- Clean-up and trash removal
- Costs to temporarily stabilize a building so that it is safe to enter to evaluate required repairs
- Costs to obtain or prepare plans and specifications
- Land survey costs
- Permit fees and inspection fees
- Carpeting and recarpeting installed over finished flooring such as wood or tiling
- Outside improvements, including landscaping, irrigation, sidewalks, driveways, fences, yard lights, swimming pools, pool enclosures, and detached accessory structures (e.g., garages, sheds, and gazebos)
- Costs required for the minimum necessary work to correct existing violations of health, safety, and sanitary codes
- Plug-in appliances such as washing machines, dryers, and stoves

## **APPENDIX B**

### **What is National Flood Insurance Program (NFIP)**

The **National Flood Insurance Program (NFIP)** is a U.S. government program created to help reduce the financial impact of floods on individuals and communities. Established in 1968, the program aims to make flood insurance more accessible and affordable, especially for people living in flood-prone areas. It provides coverage for flood-related property damage to homeowners, renters, and businesses.

1. **Flood Insurance Coverage:**
  - The NFIP provides flood insurance for both residential and commercial properties. It covers damage caused by flooding, such as water entering buildings due to heavy rains, rising rivers, or storm surges.
  - It covers both the structure of a building and its contents, although there are limits to how much coverage is available for each.
2. **Government-Managed but Private Insurers:**
  - While the NFIP is managed by the **Federal Emergency Management Agency (FEMA)**, it partners with private insurance companies to sell and service policies.
  - This public-private partnership helps make flood insurance more widely available and affordable, especially in high-risk flood areas.
3. **Flood Risk Mapping:**
  - FEMA creates flood maps that assess the risk of flooding in different areas. These maps identify "Special Flood Hazard Areas" (SFHAs), which are areas at high risk for flooding.
  - People living in SFHAs or who have federally-backed mortgages in these areas may be required by law to buy flood insurance.
4. **Affordable Insurance for At-Risk Areas:**
  - One of the primary goals of the NFIP is to make flood insurance more affordable, especially in high-risk flood zones where flooding is likely to occur. Before the NFIP, many people in flood-prone areas had difficulty obtaining flood coverage.
  - The program sets rates based on the flood risk of an area, helping people living in flood-prone regions purchase insurance at rates they can afford.
5. **Financial Protection for Communities:**
  - NFIP aims to reduce the financial burden on both individuals and the government. Without flood insurance, the cost of flood damage would often fall on taxpayers through disaster relief programs.
  - The NFIP encourages communities to implement floodplain management practices to reduce the risk of future flooding and, in turn, helps those communities qualify for lower flood insurance rates.
6. **Post-Flood Recovery:**
  - When flooding occurs, NFIP insurance helps cover the costs of repairing or rebuilding homes and businesses. It helps policyholders recover faster and reduces the long-term financial impact of floods.
  - The NFIP can also provide coverage for temporary living expenses for people whose homes are uninhabitable due to flooding.

### **How It Works:**

- **Eligibility:** Anyone living in a community that participates in the NFIP can purchase flood insurance, whether they live in a high-risk flood zone or not.
- **Cost:** The cost of flood insurance varies depending on factors like the location of the property, whether it's in a floodplain, and the building's structure. Generally, flood insurance costs more for properties in high-risk flood areas.
- **Claims Process:** After a flood, policyholders file a claim through their insurance provider. If approved, the NFIP pays for repairs or rebuilding, up to the coverage limits.

### **Why It Matters:**

- **Flooding is the most common and costly natural disaster** in the U.S., and traditional homeowners insurance typically does not cover flood damage.
- The NFIP reduces the financial impact of floods, provides peace of mind to homeowners and businesses, and promotes better flood management practices at the community level.

## **APPENDIX C**

### **Hernando County Comprehensive Plan**

A County **Comprehensive Plan** is a Florida Statute required legal and long-term, integrated, and coordinated document that outlines the vision, goals, policies, and strategies for guiding growth and development within the county. It serves as a blueprint for land use, infrastructure, housing, natural resources, and public services, and must be updated periodically to reflect changing conditions and goals. The plan ensures that development occurs in a way that balances economic growth, environmental protection, and quality of life, while maintaining consistency with state and regional planning policies.

### **Chapter 11 - COASTAL MANAGEMENT ELEMENT**

#### **Hazard Mitigation and Development/Redevelopment Principles [Florida Statute 163.3178(2)]**

**Objective 11.02D:** Hernando County shall reduce the exposure of development to natural coastal hazard impacts from high tide events, storm surge, flash floods, stormwater runoff and sea level rise through regulatory standards, hazard mitigation and post-disaster redevelopment planning.

**Strategy 11.02D(3):** Hernando County shall adhere to the minimum requirements of the Florida Building Code and the County's Flood Damage Prevention Ordinance (Chapter 13 of the Code of Ordinances) as they relate to reducing flood risk and mitigating damage from natural hazards.

#### **Repetitive Loss Properties and Best Practices**

**Strategy 11.02A(7):** The County encourages the use of best practices development and redevelopment principles, strategies, and engineering solutions that will result in the removal of coastal real property from flood zone designations established by FEMA. The County will identify and implement programs that minimize repetitive loss properties in the Coastal High Hazard Area (CHHA) and best practices to remove property from the designated flood zone including the following:

- a. The potential for acquisition, with federal assistance, repetitive loss properties;
- b. The prohibition of new mobile homes in the Coastal High Hazard Area;**
- c. Flood mitigation projects that reduce vulnerability and/or remove property from the 100-year floodplain;
- d. Stormwater maintenance and stormwater improvement projects;
- e. A Local Hazard Mitigation strategy that includes programs to elevate and/or acquire vulnerable structures; and
- f. The enforcement of floodplain management regulations and best practices.