

# Advancing Ecosystem Service Inclusion in BCA at the Local Level: FEMA Policy Impacts in Southern Wisconsin

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# EARTH ECONOMICS

- Founded in 1998 by David Batker (via Herman Daly, World Bank, Greenpeace)
- WA state based 501(c)3 non-profit
- Focus: Ecosystem Services Valuations to:
  - Champion sustainability
  - Invent novel win-win funding mechanisms for ecosystem preservation
  - Influence policy
  - Reform Accounting Rules
- Our tagline: "*We Value the Earth*"





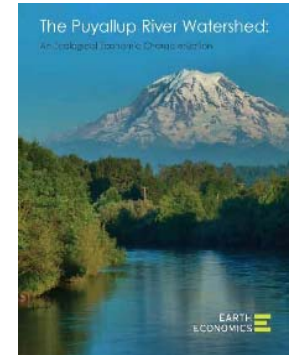
# **Earth Economics is changing policy**



# Sample Earth Economics Projects

1. Ecosystem Service Valuations (ESVs) at many scales & types:
  - Entire Colorado River Basin
  - Alaska “Mat-Su” Valley (Anchorage to Mt. McKinley)
  - Tulalip & Nisqually Tribe Valuations, WA State
  - Colombia (Legal Settlement for Anchicaya River Damages)
  - Long Island Sound Watershed
  - Costa Rica: Coastal Forests
  - Central and Northern California (9 counties)
  - Upper Mississippi watersheds
  - Mississippi Delta and storm-surge protection
2. Data Provider to FEMA’s Benefit Cost Analysis Tool
3. “21<sup>st</sup> Century Utilities” (reforming US GASB Accounting Rules)
4. Green Jobs
5. Core to all our work: Ecosystem Valuation Toolkit (EVT)

Current and past projects: [eartheconomics.org/WhatWeDo.aspx](http://eartheconomics.org/WhatWeDo.aspx)





# FEMA



## FEMA

### MITIGATION POLICY – FP-108-024-01

benefits into the overall quantification of project benefits for acquisition projects supports FIMA's mission of risk reduction, environmental compliance, and the preservation of the natural and beneficial functions of the floodplain.

FEMA collaborated with private, public, and academic sectors to develop an Environmental Benefits Analysis Report (EBAR), which identifies benefits produced by deed-restricted open space. The EBAR contains peer-reviewed academic journal articles, agency analysis, and private studies examining the economic value provided by lands both inside and outside the SFHAs. These studies provide a sound basis for generating economic values useful to FIMA. The results of the EBAR were used to develop FIMA's quantification of environmental benefits for open green space and riparian areas in the BCA Toolkit.

Regional variations in dollar values as well as differences in rural and urban areas were considered, but it was concluded that normalizing the environmental benefits through the value transfer method used in the BCA Toolkit was appropriate. While there will be a need in the future to re-study both green open space and riparian environmental benefits, FEMA believes the economic valuation used in the EBAR and in this policy are reasonable to be included in a BCA.

#### B. Environmental Benefits

Since FIMA has a primary mission to reduce or eliminate future damage from natural hazards where possible, project benefits from acquisitions must be derived primarily from avoided future damage, displacement, and other direct damage. Acquisition-related mitigation activities have proven to be the most effective example of hazard mitigation; therefore, FEMA has incorporated an environmental benefits methodology into its BCA Toolkit for acquisition-related mitigation activities. Acquisition-related activities permanently remove at-risk structures from the most vulnerable areas of the floodplain, thereby eliminating the cycle of damage, reconstruction, and repeat damage. Additionally, the inclusion of environmental benefits into the BCA Toolkit for acquisition-related activities supports floodplain management recommendations to restore and maintain the natural and beneficial functions of the floodplain.

The BCA Toolkit will automatically include environmental benefits for projects calculated to have BCRs of 0.75 or greater using traditional benefits. The environmental benefits for green open space or riparian areas are based on the size (in square feet) of the land (lot) being acquired. The inclusion of environmental benefits into the BCA does not apply to acquisition projects that are approved under the following methodologies:

- The Substantial Damage Waiver policy
- The Savings to the NFIF Methodology (GSTF)
- The HMGP 5-percent Initiative

**“...FEMA has incorporated an environmental benefits methodology into its BCA Toolkit...”**  
(June 18, 2013)





# FEMA

### III. POLICY STATEMENT:

FEMA will allow the inclusion of environmental benefits in benefit-cost analyses (BCA) to determine cost effectiveness of acquisition projects.

### IV. PURPOSE:

The purpose of this policy is to identify and quantify the types of environmental benefits that FEMA will consider in the BCA for acquisition projects.

Table I: Annual Estimated Monetary Benefits per Acre per Year

Environmental Benefit	Green Open Space	Riparian
Aesthetic Value	\$1,623	\$582
Air Quality	\$204	\$215
Biological Control	--	\$164
Climate Regulation	\$13	\$204
Erosion Control	\$65	\$11,447
Flood Hazard Reduction	--	\$4,007
Food Provisioning	--	\$609
Habitat	--	\$835
Pollination	\$290	--
Recreation/Tourism	\$5,365	\$15,178
Storm Water Retention	\$293	--
Water Filtration	--	\$4,252
<b>Total Estimated Benefits</b>	<b>\$7,853</b>	<b>\$37,493</b>

Table II: Green Open Space and Riparian Benefits Allowed in the BCA Toolkit

Land Use	Total Estimated Benefits	Total Estimated Benefits (projected for 100 years with 7 percent discount rate)
Green Open Space	\$7,853 per acre per year	\$2.57 per square foot
Riparian	\$37,493 per acre per year	\$12.29 per square foot

Average benefits of  
elevation and acquisition = \$276,000 and  
\$175,000

Automatically Cost Effective


U.S. Department of Homeland Security  
500 C Street, SW  
Washington, DC 20472



FEMA

MEMORANDUM FOR: Regional Administrators  
Regions I-X

ATTENTION: Regional Mitigation Division Directors  
Hazard Mitigation Assistance Branch Chiefs

FROM: David L. Miller   
Associate Administrator  
Federal Insurance and Mitigation Directorate

SUBJECT: Cost Effectiveness Determinations for Acquisitions and Elevations in Special  
Flood Hazard Areas Using Pre-calculated Benefits

This memorandum supersedes the August 15, 2013 version and clarifies the use of pre-calculated benefits to determine cost effectiveness of elevations and acquisitions in Special Flood Hazard Areas (SFHA). The Risk Reduction Division analyzed over 11,000 structures acquired or elevated and found that the average benefits for each project type are \$276,000 and \$175,000 respectively. Therefore, FEMA has determined that the acquisition or elevation of a structure located in the 100-year floodplain as delineated on the Flood Insurance Rate Map (FIRM) or based on best available data, that costs less than or equal to the amount of benefits listed above is considered cost effective. For projects that contain multiple structures, the average cost of all structures in the project must meet the stated criterion.

This methodology is available for all Hazard Mitigation Assistance (HMA) grant programs and can be applied to new applications as well as pending projects where the application period has expired. Additionally, pre-calculated benefits can be used to evaluate cost overruns for approved projects, if a new cost effectiveness review is being performed.

The specific geographic location of structures can increase acquisition and elevation costs. The benefit amounts identified above may be adjusted by using the most current locality multipliers included in industry accepted construction cost guides. If a multiplier is used, a copy of the source document must be included as part of the grant application.

The applicant or subapplicant must provide a map that clearly identifies the structure's footprint and delineates the 100-year SFHA, using the FIRM or best available data. If any part of the structure lies within the 100-year SFHA, the applicant or subapplicant can use the pre-calculated benefit value to demonstrate cost effectiveness. As an alternative, First Floor Elevation (FFE) and Base Flood Elevation (BFE) can be provided for each structure. If the FFE is lower than the BFE, pre-calculated benefits can be used to demonstrate cost effectiveness. No other detailed analysis is required. These pre-calculated benefits can be used in 100-year floodplains in riverine and coastal areas.




# What is the impact on the ground?

## ■ Our hypotheses:

- The new BCA mitigation policy will help expand floodplain access for rivers and streams.
- By establishing a threshold for automatic cost-effectiveness, acquisition and elevation applications will become much simpler for the towns, counties, and states involved.



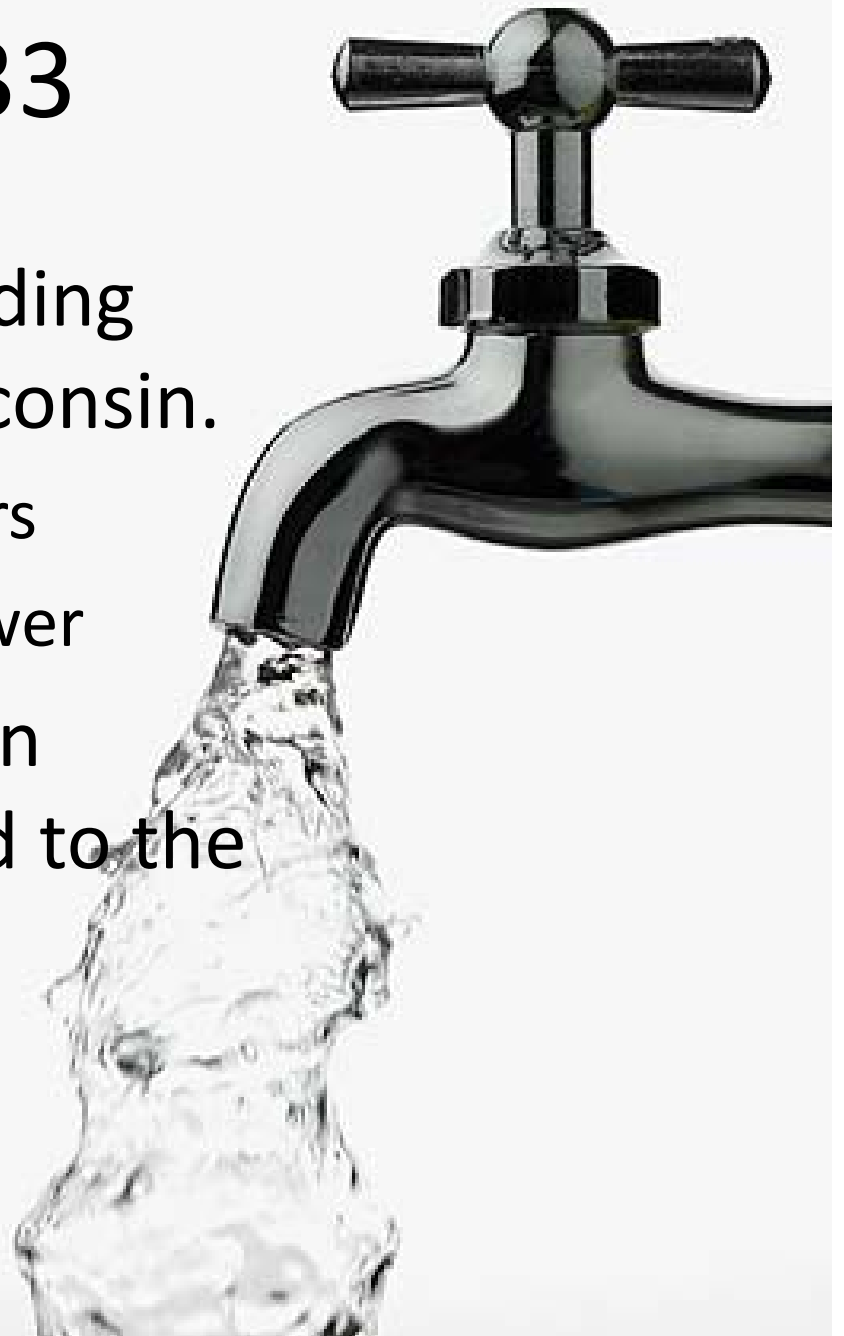


# Case Study 1: Jefferson County

**Do the new policies change  
acquisition funding during a  
federal disaster?**

# DR-1933

- July, 2010, significant flooding throughout southern Wisconsin.
  - 12 inches of rain in 24 hours
  - 32,000 people without power
- Ultimately over \$50 Million federal dollars contributed to the recovery efforts





# Jefferson County Applies for Mitigation Funding

- 37 high priority properties for acquisition
- Only 20 in the final proposal to FEMA with BCR=1.04
- \$1.3 million provided from HMGP funds



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# Our Approach

- Rerun the BCA Toolkit V5.0 with the new policies in mind.
- Ask ourselves and the toolkit if we can get every property to pass the 1.0 BCR threshold.





## Preliminary Results

- After inflation, only four of the properties were above the automatic cost effectiveness threshold.
- Of the four, only one qualified for including ES on its own.
- Because of the way that bundling can occur for project applications, ASFPM and WI EM were able to demonstrate that **all 37 properties could have reached a 1.0 BCR.**



# Case Study 2: City of Portage

## **Ecosystem Services and Stormwater Management**



# Original FEMA application

- Submitted February 2012
- Requested about \$430,000
- Construct a parallel storm sewer to an existing sewer line that would alleviate flooding and damages to residential properties.
- The project proposed was meant to increase storm sewer drainage capacity for short duration storm events







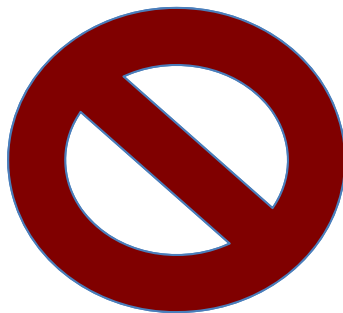
# FEMA Response

- Cost: 440,249
- Benefits: 472,855

Benefit-Cost Ratio of 1.07

- FEMA throws out many of the benefits

Benefit-Cost Ratio of 0.11



Application Rejected

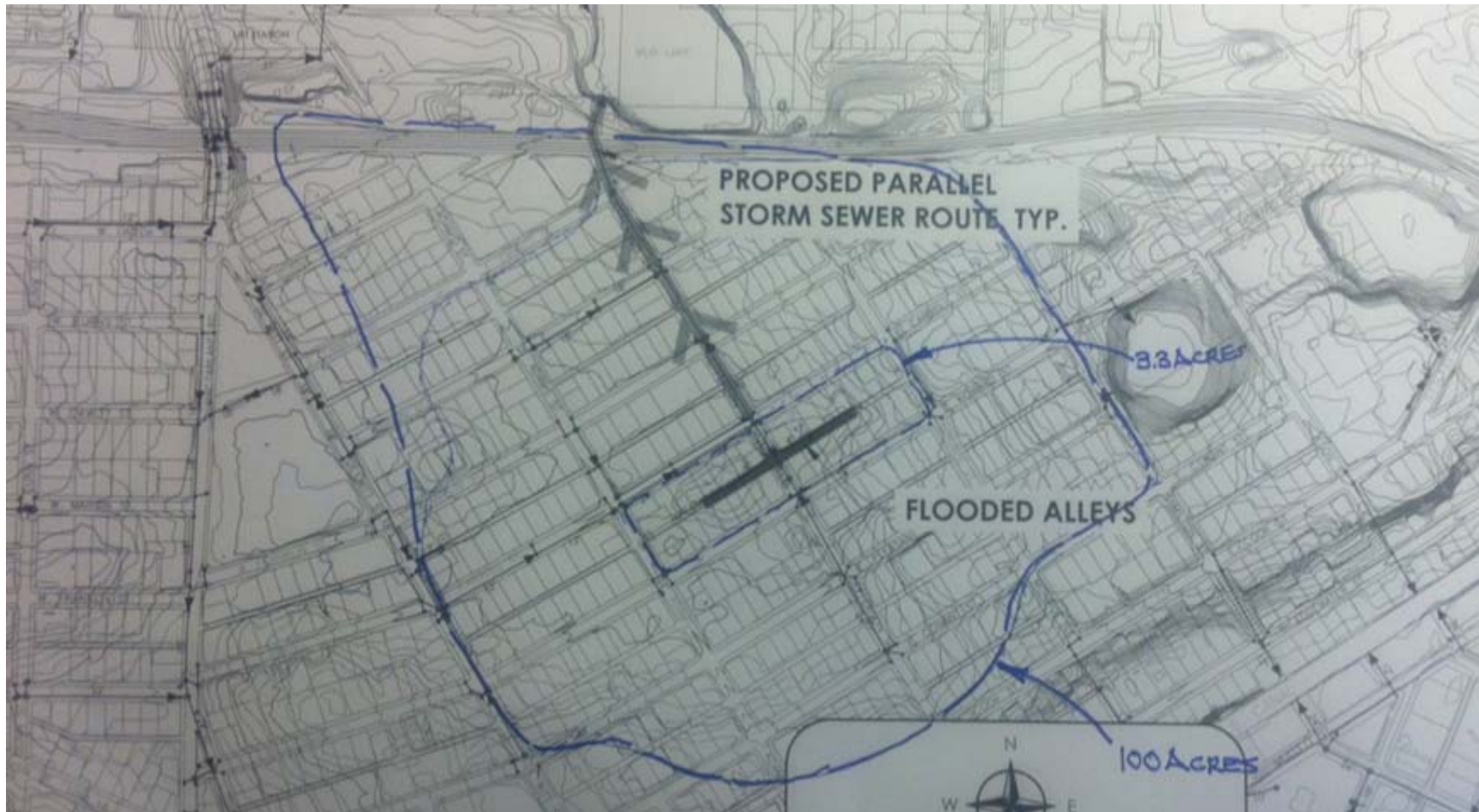


# Alternative Approaches

- We believe that the current proposal – to add another 36 inch pipe, connect little mud lake and big mud lake, and dredge the flow from big mud lake – is not the most effective or efficient means of solving the problem. The following alternatives were recommended instead:
- Placing rain gardens around the neighborhood
- Voluntary purchasing 1-2 properties in the lowest area to convert to detention basins
- Installing permeable pavement above the low spot to slow flow down.

Rain Gardens vs. Gray Infrastructure (dredging, storm sewer, upgrade lift stations, raise sidewalks and/or alleys)			
	Rain Gardens		Gray Infrastructure (not specified)
Ecosystem	Increase urban greenspace areas Increase Riparian Area (wetlands?) Increase Open Canopy Area		No Effect
Water Quality	Increase Sediment Retention Increase Nutrient Retention Increase Pollutant Retention Decrease Water Temperature		Increase Sediment Retention Increase Nutrient Retention Increase Pollutant Retention Increase Water Temperature
Moderation of Extreme Events	Decrease Velocity Decrease Flooding Severity Increase Consistency of Flow Increase Late Season Flow		Decrease Stormwater Runoff Velocity Decrease Flooding Severity
Habitat	Increase Wildlife Habitat Increase Insect Habitat		Decreases Wildlife Habitat Decreases Insect Habitat
Air Quality	Increase removal of air pollutants		No Effect
Water Supply	Increase Surface Water Storage Increase Groundwater Storage Increase Water Depth		Increase Surface Water Storage
Biological Control	Increase insect visitation		Decrease insect habitat
Climate stability	Increase carbon sequestration and storage		No Effect
Pollination	Increase genetic variability		No Effect
Aesthetic information	Increase value to nearby properties Increase aesthetic beauty		Decrease property value Decrease aesthetic beauty
Science and education	Increase area to interact with nature Increase areas to promote hands on learning		No Effect
Economic Benefits	Value Appreciates Over Time		Value Depreciates Over Time

# Area for alternative approaches





# Questions?



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Reports available at [eartheconomics.org](http://eartheconomics.org)

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