



HOWARD COUNTY DEPARTMENT OF INSPECTIONS, LICENSES AND PERMITS

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Date: May 25, 2022

To: Lonnie Robbins, Chief Administrative Officer  
Department of County Administration

From: Robert Frances, P.E., Director *R. J. Frances*  
Department of Inspections, Licenses, & Permits

Subject: Testimony Regarding Floodplain Changes to Titles 3 and 16

The Departments of Inspections, Licenses, & Permits (DILP) and Planning & Zoning (DPZ), in coordination with the Department of Public Works (DPW) have proposed legislation changes to the County's floodplain regulations. This is being done to be compliant with revised FEMA flood proofing requirements, as well as requirements of the National Flood Insurance Program (NFIP). The proposed changes are needed to maintain the County's current rating under the Community Rating System (CRS). The CRS is used by insurance companies to set flood insurance rates in the County, where applicable.

The proposed changes involve eliminating the ability to protect electrical, heating, ventilation, plumbing, air conditioning equipment and other associated building service facilities and utilities by water tightness and structural floodproofing methods, as previously allowed under FEMA. These methods are no longer recognized and the only permitted way to protect service equipment is by elevation. Since Howard County requires a two foot (2') freeboard, all service equipment will be required to be elevated two feet (2') above the flood elevation.

The proposed changes are being made to both Titles 3 and 16 of the County Code to be consistent.

Fiscal Impact:

There is no fiscal impact to these code changes and review of this new requirement can be absorbed by current staff.

If you have any questions, I can be reached at extension x3946.

Copy: Don Mock, P.E., Chief of Plan Review, DILP  
Amy Gowan, Director, DPZ  
Mark Richmond, P.E., Bureau of Environmental Services, DPW  
Thomas Meunier, P.E., Director, DPW  
Jennifer Sager, County Administration