

Substantial Damage Management Plan Annual Evaluation Report

NFIP Community #: 290174

CRS communities that receive Substantial Damage Plan (SDP) credit (Activity 512.d) for having a plan to manage substantial damage within their jurisdictions are required to either update the SDP or submit an evaluation of the SDP every year with their annual CRS recertification. The purpose of this evaluation is to focus on specific portions of the plan and initiate changes, if needed.

Date initial SDP was submitted to City Council: September 19, 2023

Date current SDP was submitted to City Council: September 19, 2023 (SDP has not been revised since initial development)

Date this evaluation report was submitted to City Council: October 7, 2025

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1. What process was used to evaluate the SDP and to prepare this annual evaluation report for the past year?

City staff has reviewed the entirety of the City's SDP, section by section, to determine if the SDP is accurate and/or needs to be updated or revised.

2. Over the past year, were any changes made to location ordinances, regulations, definitions, or other standards that pertain to the substantial damage or substantial improvement of buildings? If yes, please describe changes.

Yes. The City's Floodplain Ordinance includes a 2-foot freeboard requirement. However, the CRS Resource Specialist assigned to the City of Lee's Summit indicated that the City cannot receive full CRS credit for a higher freeboard standard until the City clarifies specific language of the City's Floodplain Ordinance (Section 5.170.A.8). In addition, the requirement for cumulative tracking of



substantial damage, substantial improvement, and cumulative improvement has been adjusted to a 5-year rolling period for all three types of tracking, to maintain consistency. Revisions to the Floodplain Ordinance are currently in process and will be presented to the City Council in the coming months.

3. For each of the six steps of the CRS-credited planning process, indicate whether it has been implemented or changed, and explain.

The City has not experienced any flooding since the last annual evaluation report was prepared in 2024.

Step 1 (Substantial Damage Vulnerability Assessment)

As part of the annual SDP review, City staff evaluated all components of Step 1. Updates or revisions to these components are explained below.

Component 1 (Substantial Damage Regulations and Definitions Review)

• definitions for Substantial Damage, Substantial Improvement, and Repetitive Loss in Article 5 of the City's UDO.

As explained in Question 2 above, the City's Floodplain Ordinance includes a 2-foot freeboard requirement. However, the City's CRS Coordinator indicated that the City cannot receive full CRS credit for a higher freeboard standard until the City clarifies specific language of the City's Floodplain Ordinance (Section 5.170.A.8). In addition, the requirement for cumulative tracking of substantial damage, substantial improvement, and cumulative improvement has been adjusted to a 5-year rolling period for all three types of tracking, to maintain consistency. Revisions to the Floodplain Ordinance are currently in process and will be presented to the City Council in the coming months. No changes to the Repetitive Loss definition are necessary.

Component 2 (Previous Substantial Damage and Substantial Improvement Determinations)

- primary flood risk to the community
- flood damage history related to flood risk
- prior damage assessment records

No changes to the primary flood risk or flood damage history related to flood risk have been identified since the last annual evaluation report was prepared in 2024.

Component 3 (List and Maps of SFHA Properties)

inventory and maps of structures susceptible to Substantial Damage

No changes to the inventory of structures susceptible to Substantial Damage or to the maps locating these structures have been identified since the last annual evaluation report was prepared in 2024.

Component 4 (Other Considerations, including Tracking Procedures for Substantial Damage)

- tracking procedures for Substantial Damage and Repetitive Loss properties
- tracking procedures for Substantial Improvement, although this is actively being discussed among staff to determine if a better method is available

No changes to the tracking procedures for Substantial Damage, Repetitive Loss, or Substantial Improvement have been identified since the last annual evaluation report was prepared in 2024.

Component 5 (General Description of Buildings on Potential Substantial Damage list)

general description of structures on the City's potential Substantial Damage list

No changes to the description of structures on the City's potential Substantial Damage list have been identified since the last annual evaluation report was prepared in 2024.

Step 2 (SDP Team)

As part of the SDP review, City staff evaluated the list of SDP team members identified in the City's SDP. No changes have been made to the SDP Team since the last annual evaluation report was prepared in 2024.

Step 3 (Post-Event Efforts Related to Substantial Damage):

As part of the SDP review, City staff evaluated all components of Step 3. No updates or revisions to these components were determined necessary.

Component 1 (Post-Event Coordination and Communication efforts)

- staff training; actively being scheduled and implemented
- communications with elected officials, property owners, and the public

No changes to staff training or post-event communications with elected officials, the public, or property owners were identified during review of the City's SDP or since the last annual evaluation report was prepared in 2024.

Component 2 (Damage Estimate and Substantial Damage Determination Procedures)

- initial damage assessment screening procedures
- substantial damage determination procedures, including determinations of: damage costs, structure market value, comparing damage costs and market value to substantial damage thresholds, requiring property owners to obtain permits for rebuilding.

No changes to initial damage assessment screening procedures or substantial damage determination procedures were identified during review of the City's SDP or since the last annual evaluation report was prepared in 2024.



Component 3 (Compliance Procedures for Substantially-Damaged Structures)

- procedures for notifying property owners of substantial damage
- if warranted, procedures for:
 - obtaining affidavits from property owners and contractors
 - o obtaining an Intent to Raze or Demolish document
 - o providing temporary certificate of occupancy, if warranted
- variance procedures
- compliance enforcement procedures
- procedures for notifying the City Attorney and SEMA/FEMA

No changes to compliance procedures for substantially-damaged structures were identified during review of the City's SDP or since the last annual evaluation report was prepared in 2024.

Step 4 (Database for Substantial Damage Estimates):

As part of the SDP review, City staff evaluated all components of Step 4. No revisions to these items were determined necessary.

Components 1 & 2 (Basic Substantial Damage Property Database & Pre-Populating FEMA SDE 3.0)

property information in City Excel spreadsheet and FEMA SDE 3.0 database

The City has not experienced any flooding since the last annual evaluation report was prepared in 2024.

Step 5 (Pre-Event Actions to Address Potential Substantial Damage):

As part of the SDP review, City staff evaluated the City's process of educating the community about substantial damage requirements. No update or revision to this process was determined necessary and no changes have been made to the process since the last evaluation report was prepared in 2024.

Step 6 (Plan Implementation and Update Procedures):

As part of the SDP review, City staff evaluated the process for annual SDP review, procedures for annual communication with the City Council, process for updating the SDP. No updates or revisions to these items were determined necessary and no changes have been made to the process since the last evaluation report was prepared in 2024.

4. For each pre-event action item listed in the SDP (Step 5), indicated whether the team was implemented during the past year, describe the implementation, and explain what change is recommended for that item, if any.



The SDP Team has not met since April 11, 2024 and the City has experienced any flooding since the last annual evaluation report was prepared in 2024.

5. Over the past year, has the community experienced any flood damage? If yes, please describe.

No. The City has not experienced any flooding since the last annual evaluation report was prepared in 2024.

6. Over the past year, was the SDP used after a flood or other event? If yes, please describe how the SDP was implemented, how its use was evaluated, and what recommendations were made for improvements.

No. The City has not experienced any flooding since the last annual evaluation report was prepared in 2024.

7. Have any community officials participated in training on substantial damage or in training on the SDP over the past year?

No. If the City Council is interested in receiving training on Substantial Damage, City staff will happy to provide that training.

8. Has the SDP been revised or updated in the past year? If yes, describe the circumstances of the update, the specific changes, and attach a copy of the revised plan.

No. City staff reviewed the entirety of the City's SDP, section by section, but determined that no updates or revisions were necessary this year.

9. As a result of the review of the SDP, are there any recommendations or changes to the plan? If yes, please describe and explain.

Yes. In 2024, the City's Fire Department Emergency Manager reviewed the plan and suggested modifying the language to broaden key words to include an all-hazard approach, while still be inclusive of flood-specific hazards. At this time, City staff has decided to leave the plan as is, since the plan is new and was approved by FEMA/CRS as is. This is a change that may be addressed with the next revision to the plan.

- 10. For communities receiving SDP2 credit:
 - a. Has a review of the property database been completed?

Yes, City staff has reviewed all of the properties in the FEMA SDE 3.0 software.



b. Has any outdated information been corrected in the database (structures removed from the list, changes in property ownership or in market value, etc.)

Yes, City staff has reviewed all of the properties in the FEMA SDE 3.0 software to ensure the data is as accurate as possible.

c. Has the updated database been imported into FEMA's SDE 3.0 software?

Yes. City staff corrected ownership on one property in FEMA's SDE 3.0 software.

- **11. For communities receiving SDP3 credit:** (not currently applicable to the City of Lee's Summit)
 - a. Has the list of properties of potential substantial damage areas changed during the past year?

N/A

b. Have any properties listed in the SDP been mitigated during the past year?

N/A

c. Has the community's mitigation strategy for these properties or areas changed during the past year?

N/A

12. Other comments?

None