

# Eagles Flock CRS Implications of the Condominium Pathway

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## Notes on CRS Implications of the Eagles Flock Condominium Pathway

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**From:** Michael Hoffman, North Star Group, Inc. **To:** Nathan Satcher, AICP, CFM — Senior Planner & Floodplain Administrator, City of Hattiesburg **Date:** April 18, 2026 **Re:** Eagles Flock / Leaf River — PPIN 26786 and PPIN 26700; separate note accompanying the condominium/subdivision memo

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### A note up front

This note accompanies the research memo on the condominium regime question. The Community Rating System implications are separated because they sit with the City's floodplain program rather than with the legal review. The City of Hattiesburg earned the Class 8 → Class 7 upgrade effective April 1, 2026, with the 15% NFIP premium discount for policyholders.<sup>1</sup> That is a meaningful municipal outcome, and this note is written so nothing about the way Eagles Flock is structured — subdivision, condominium, whatever path ends up working — puts that classification at risk, even at the margin.

So I went through the CRS Coordinator's Manual to understand how a single condominium-structured project would relate to the credit activities the City is banking on, and wanted to share what I found. Same caveats as the other memo: I'm no lawyer, I'm not a CFM, and I'm not a CRS Specialist. If I've read any of this wrong, I'd genuinely welcome the correction — and would rather find out now than later.

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### 1. What the CRS credits, at a high level

The Community Rating System is a voluntary NFIP program that awards credit points to communities for floodplain management activities that exceed the NFIP minimum.<sup>2</sup> Classifications run from Class 10 (non-participating) to Class 1 (best); Class 7 corresponds to a 15% premium discount for policyholders inside the SFHA.<sup>3</sup>

Credit is earned across 19 activities organized in four series:<sup>4</sup>

- **300 series** — Public Information (mapping outreach, hazard disclosure, flood protection information, advice)
- **400 series** — Mapping and Regulations (Activities 410 mapping, 420 open space preservation, 430 higher regulatory standards, 440 flood data maintenance, 450 stormwater management)
- **500 series** — Flood Damage Reduction (510 floodplain management planning, 520 acquisition and relocation, 530 flood protection, 540 drainage system maintenance)
- **600 series** — Warning and Response (610 warning and response, 620 levees, 630 dams)

Credit is verified by the ISO/CRS Specialist and recertified annually. The classification is based on the total credit points the community earns across the

activities it has chosen to implement.

The structure of CRS credit matters here: **credits are earned at the community program level, not at the individual project level.** What the City does — its regulations, maps, plans, outreach programs, warning systems — generates the credits. A single project conforming to (or not triggering) a particular regulation doesn't add or subtract community credit.

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## **2. The question: does the condominium pathway affect the City's CRS standing?**

The short version of my read: **no, the condominium pathway does not diminish the City's CRS credit**, because all of the credit-bearing activities continue to operate as before. A condominium-structured development at Eagles Flock wouldn't remove a single word from any City regulation or plan. If the City's platted-subdivision rules don't apply to this particular project (because it's not a platted subdivision), they still apply to every actual platted subdivision in the jurisdiction — and that's where the credit lives.

Activity by activity:

**Activity 410 (Floodplain Mapping), 440 (Flood Data Maintenance)** — unaffected. Mapping and data activities are City-level programs independent of any project.

**Activity 420 (Open Space Preservation)** — potentially *strengthened*, not weakened. Activity 420 rewards permanent preservation of floodplain land as open space, with credit scaled to the portion of the regulatory floodplain preserved.<sup>5</sup> The Eagles Flock parcels are roughly 31 acres in floodway and Zone AE. A condominium declaration recorded under Miss. Code § 89-9-17 could include deed-level restrictions permanently prohibiting development in the floodway portion of the project. Those kinds of permanently recorded, enforceable restrictions are what Activity 420 credit contemplates. (Worth saying plainly: I'm flagging this as a possibility, not proposing it as a specific design commitment — that's a conversation for later, with you and with the team.)

**Activity 430 (Higher Regulatory Standards)** — unaffected. Activity 430 rewards regulatory standards that exceed NFIP minimums.<sup>6</sup> Ordinance #3294 Article 5 Section C.8 (floodway standards, no-rise per structure) is a per-structure regulation that applies to every building proposed in the floodway regardless of whether the project is subdivision-structured or condominium-structured. The freeboard, substantial improvement, elevation, and no-rise elements that drive 430 credit all operate on individual structures and would all apply to any building at Eagles Flock.

**Activity 450 (Stormwater Management)** — unaffected. Site stormwater requirements apply to the project regardless of ownership structure.

**Activity 510 (Floodplain Management Planning)** — unaffected. Community-level planning activity.

**600 series (Warning, Levees, Dams)** — unaffected.

On the specific element worth naming: Activity 432.a(2) credits communities that prohibit new buildings in the SFHA.<sup>7</sup> Hattiesburg does not take full DL2 credit for a total SFHA building prohibition — you allow regulated construction under Article 5 Section C. The condominium pathway doesn't change that posture either direction. Whatever is or isn't credited under 432.a for subdivision-context

building prohibitions continues to operate as today.

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### 3. Where CRS credit might actually be strengthened

Two elements worth flagging because a well-drafted condominium declaration can make them cleaner, not weaker:

**Permanent, deed-level restrictions.** Under Ordinance #3294 Article 5 Section E.11, platted subdivisions in the SFHA are required to include deed restrictions and a plat statement prohibiting construction in the SFHA. A condominium regime can include equivalent — or stronger — restrictions in the recorded Declaration of Restrictions under Miss. Code § 89-9-17. The restrictions bind every unit owner and every successor in interest, and they survive tax foreclosure under § 89-9-31. That’s a durable floodplain management instrument.

**Single-owner enforceability during build-out.** During development, the entire project sits under one owner’s control (the declarant), which simplifies floodplain-compliance enforcement compared to a platted subdivision where lots transfer individually during and after build-out. The Floodplain Administrator’s permit-level review remains per structure.

Neither of these is a claim that the project will accrue new CRS credit. They’re observations that the condominium form doesn’t weaken the floodplain-management instruments the City relies on, and in some respects may be cleaner.

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### 4. What I’d want you to push back on if I’ve got it wrong

Three places where I’d expect your CFM read to be sharper than mine:

1. **Impact-adjustment math on Activity 420 / 430.** If the City is currently getting impact-adjusted credit that depends on the platted-subdivision mechanism specifically, that calculus might change — though I don’t see a path for that, since the credit follows the regulation, not the project.
2. **Activity 510 (Floodplain Management Planning) documentation.** If the City’s adopted plan commits to particular regulatory treatments that a condominium regime would implicate, that’s worth knowing.
3. **Repetitive loss area overlap.** I don’t know whether the Eagles Flock parcels sit within a designated repetitive loss area. If they do, that’s a layer I didn’t address and would change the analysis.

If any of those flags a concern I’ve missed, I’d rather hear it now.

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### 5. Bottom line

The 15% NFIP discount Hattiesburg just earned reflects a City-level program of regulations, plans, maps, and warning systems. A condominium-structured project at Eagles Flock doesn’t touch any of those programs. Article 5 Section C.8 floodway standards apply per structure regardless. The platted-subdivision credits (if any are in the City’s mix) continue to apply to every actual platted subdivision in the City. The condominium declaration can carry permanent, recorded restrictions that are at least as strong as the plat-level deed restrictions required under Article 5 Section E.11, and potentially stronger.

None of this requires the City to do anything differently. Writing it up because

you're the CFM carrying the program, and it felt right to put the CRS question on the record alongside the legal question rather than leave it implicit.

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## Footnotes

<sup>1</sup> WJTV/WHLT, "Hattiesburg boosts FEMA rating, gains flood insurance savings" (reporting Mayor Barker's announcement of Class 8 to Class 7 upgrade, 15% discount effective April 1, 2026). <https://www.wjtv.com/news/pine-belt/hattiesburg-boosts-fema-rating-gains-flood-insurance-savings/>

<sup>2</sup> FEMA, *Community Rating System* program overview. <https://www.fema.gov/floodplain-management/community-rating-system>

<sup>3</sup> FEMA CRS premium-discount table. Class 7 corresponds to a 15% discount inside the SFHA. Same URL as footnote 2.

<sup>4</sup> FEMA, *CRS Coordinator's Manual* (2017 edition with 2021 Addendum). [https://www.fema.gov/sites/default/files/documents/fema\\_crs\\_coordinators-manual\\_082025.pdf](https://www.fema.gov/sites/default/files/documents/fema_crs_coordinators-manual_082025.pdf)

<sup>5</sup> CRS Coordinator's Manual, Activity 420 — Open Space Preservation, Section 422. Credit is impact-adjusted based on the proportion of the regulatory floodplain preserved. Additional credit is available for deed restrictions and natural floodplain functions. Same URL as footnote 4.

<sup>6</sup> CRS Coordinator's Manual, Activity 430 — Higher Regulatory Standards, Sections 432.a (DL1 fill prohibition, DL2 building prohibition, DL3 material storage prohibition) and related. Same URL as footnote 4.

<sup>7</sup> CRS Coordinator's Manual, Activity 432.a(2) — Prohibiting new buildings in the SFHA, credit under Section 432.a. Same URL as footnote 4.