



# ASSOCIATION OF STATE FLOODPLAIN MANAGERS, INC.

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October 30, 2007

Doug Bellomo  
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**RE: ASFPM Mapping and Engineering Standards Committee Comments on “FEMA’s Flood Map Modernization: Preparing for FY09 and Beyond”**

Dear Doug:

The Association of State Floodplain Managers (ASFPM), Mapping and Engineering Standards Committee offers the following comments on the Draft “*FEMA’s Flood Map Modernization: Preparing for FY09 and Beyond*” document. The numbered comments correspond to the numbered issue areas identified in Section 7 Questions to Consider, of the June 1, 2007 draft. We commend FEMA for their vision of the future and look forward to refining that vision together.

1. *Watershed-based Risk Assessment:* While a noble goal, the development of watershed-based risk assessments is far less critical than the still-pressing need for updated floodplain mapping in many areas. Flood Map Modernization Phase I will leave some communities unmapped, and many others with only marginally updated maps, especially those from the early phases of the program where digital conversions were emphasized. We would prefer to see these limited national resources routed into floodplain mapping, with risk assessments left to the State and local levels.

*Mitigation Planning:* Similar to watershed-based risk analysis, while mitigation planning is an important goal, the limited resources available should be focused on floodplain mapping. We believe that additional, but simple, mitigation outreach efforts as part of the floodplain scoping and mapping process are desirable, but these should form a small fraction of the effort invested in any community from mapping funds.

2. *Flood data management, currency and credibility:* The approach in Section 5 of the document contains laudable goals for Phase II of Map Modernization. Within element c of this plan, we prefer

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that the highest possible amount of resources be spent on flood map production, and the lowest amount on expansion of the MIP. We believe that data storage and retrieval is the most vital function of the MIP. There are disconnects and redundancies between the data storage on the MIP, map delivery via the Map Service Center Web store, and the FEMA library. The “national map layer” delivered via the MIP and the digital data and maps delivered from the MSC need to be fully integrated. This needs attention and should take priority over tools development. Protocols for routine digital map data maintenance e.g. incorporation of Letter of Map Revision in the digital database are lacking. These tasks should be the focus for ensuring digital data maintenance.

The validation process while conceptually on target lacks a clearly articulated or thoughtful process to capture and store the information. The validation protocol is not ready for implementation. The larger vision for tracking status of flood hazard data, community needs, and prioritization protocol for future allocation of resources should be clearly thought out and articulated before implementation.

An element missing from the approach is engaging communities in actively working to keep their maps up to date. A vast number of communities do not realize their responsibility to inform FEMA of physical modifications that change flood elevations and hence floodplain boundaries. It is common for new bridges/culverts or flood control projects to be constructed by the state (e.g. department of transportation) or other agency (e.g. NRCS), who are not required to notify FEMA; the communities either do not realize their responsibility or are unwilling to expend their resources to prepare the complex technical reports required for map changes as well as the review fees associated with the application. The result is outdated maps and local perception that the maps lack credibility. In the case of new development, communities again fail to assure that the appropriate technical data is submitted to FEMA. Lack of action by the communities creates a backlog of unresolved issues which taps mapping funds when new maps are prepared. Greater outreach to communities and a streamlined system for map updates will greatly improve the currency of the floodplain maps.

3. *Prioritization of flood hazard data needs:* Prioritization of mapping needs within each state should be done working with the state. We believe the priority order and ranking systems listed below should be used for future flood hazard updates
  - a. Levee flood hazard assessments and mapping, ranked by population at risk behind the levee
  - b. Bringing digital maps to all communities, ranked by population in the floodplain
  - c. Coastal and riverine flood hazard compliance with the NVUE standard, ranked by population in the floodplain
  - d. Coastal and riverine flood hazard compliance with the Floodplain Boundary Standard, ranked by population in the floodplain
  - e. Coastal and riverine miles meeting the drainage area and population density criteria with effective floodplains
  
4. *Performance Measures:* We believe that the performance measures in Section 6.1 should be replaced as follows. We also offer suggested end-state targets for these goals:
  - a. Percentage of Nation’s population with effective digital FIRMs (95%)
  - b. Percentage of effective stream and coastal miles meeting the Floodplain Boundary Standard (75%)



- c. Percentage of total stream and coastal miles with drainage areas over five square miles and with population densities in the top three quartiles having an effective floodplain delineation (95%)
- d. Percentage of effective stream and coastal miles compliant with the NVUE standards (Percentage of effective stream and coastal miles for which an up-to-date digital flood model matching the effective floodplain delineation is available (75%))
- e. Percentage of levee miles whose flood protection level is accurately represented on an effective FIRM (100%)

*Data Management:* While the creation and maintenance of the MIP has been a successful beginning, these activities also require substantial amounts of much-needed resources that could be better used elsewhere. There is duplication of information gathering and delivery between the MIP and the MSC. It appears that the digital DFIRM data are uploaded to the MIP for storage and separately maintained and distributed by the MSC. The MSC has an effective web interface and is a recognized tool for distribution of flood maps and LOMC information. The MIP map viewer seems superfluous, the MSC FIRMette tool needs to be upgraded to produce D-FIRMettes. The LOMC depot and the MIP public records are duplications of effort and it is not apparent that they are drawing from the same data source, which ultimately leads to inconsistencies in addition to duplication of effort. Further, the term DFIRM database is used quite loosely. In fact only exports from the DFIRM geodatabase are delivered and stored on the MIP and at the MSC, not the geodatabase itself. Maintenance of the digital data cannot occur when the basic product is not stored or disseminated. We propose that the investment in the MIP be leveraged as much as possible by focusing on the **data storage and delivery aspect coordinated with standard FEMA web services** rather than the creation of new tools. It is vital that issues such as protocols for routine maintenance of the digital geodatabase and coordination between MIP, MSC, CIS and the FEMA library be resolved before moving forward.

While a great deal of focus is placed on the DFIRMs, the Flood Insurance Study (FIS) which contains the Floodway Data Tables and Profiles, other technical data provides vital information for floodplain management. However, no mechanisms to ensure that these data are maintained in harmony with the DFIRMS has been outlined. The FIS and the technical data reported therein remain in the pre-Map Mod format and formulation. These data need to be readily updated reflect LOMCs.

The FEMA Guidelines and Specifications which prescribe the technical details for flood studies and mapping are out of date. The Data Capture Standards (Appendix N) released in May 2005 have been widely criticized due to their narrow focus, administrative costs, and lack of consistency with the enhanced DFIRM database (which is designed to capture similar model and basic data used in the mapping). The DFIRMs and the technical data used in their development cannot be maintained with out clear, consistent, and reasonable guidelines for deliverables.

We also propose that the data uploading and progress reporting elements of the MIP be vastly simplified to eliminate unnecessary administrative time.

To effectively partner with State, Tribal and local governments data ownership should be encouraged. A distributed data repository with effective tools for data upload and exchange will fulfill the need for a data repository.



5. *Additional Components:* We believe that the next generation of this concept paper should contain an accurate assessment of program costs as well as a schedule. Our initial instinct is that the program outlined above will require the continuation of the current \$200M per year funding for an additional 10 years. We believe that at least a \$200M level of funding is preferred because the mapping partners and FEMA regions are already accustomed to this level of production. If new legislation adds new mapping tasks, more that \$200 M is needed.

6. *Comments:*

One element missing from this paper is discussion of the long-term funding stream. Eventually, Map Modernization will end, and a long term plan for maintenance of the maps produced with only flood insurance policy-based funding will be necessary. Likewise, if the successes of Map Modernization with regard to increased partner capacity are to be continued, those partners will also require continued funding streams. The assessment of long term federal funding and encouragement of and incentives for the development of long term partner-level funding should be a priority of Phase II.

Finally, in Section 6.3, we suggest that the first paragraph discuss FEMA partnerships with State, regional and local governments first and indicate that when these partnerships are not feasible engineering and mapping contractors are utilized to fill the gap.

It would be good if the last sentence of this section would put a more positive spin on the roles of State, Tribal and local governments and be more goal oriented. We suggest it be changed to read: In Flood Map Modernization Phase II, there will be increased efforts to partner with State and local governments to build long term relationships in floodplain management and flood hazard map maintenance.

Once again, we thank you for the opportunity to provide these initial comments on this important issue. We look forward to continuing to work with FEMA in an effort to improve the quality of floodplain maps now and in the future. Should you have any questions or need additional information or clarification on any of these comments, please feel free to contact either of us. Again thank you and we look forward to working with you and your staff.

Respectfully,

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Co-Chair ASFPM Mapping &  
Engineering Standards Committee

Sally McConkey, P.E.  
Co-Chair ASFPM Mapping &  
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C: Michael Buckley, Deputy Assistant Administrator for Mitigation, FEMA  
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