

ASFPM Mapping & Engineering Standards Committee

Risk MAP Guidelines and Standards (G&S) 2019 Annual Maintenance Cycle Comments

Aug. 15, 2019

SID #73 - An equal conveyance reduction method must be used to establish the minimal regulatory floodway, except where an initial equal conveyance floodway is adjusted in coordination with FEMA and the impacted communities.

ASFPM M&ES Committee comments: This is likely accommodation for 2D floodways where the "equal conveyance" concept is antiquated and doesn't work well in the model. ASFPM M&E concerns include the possible contradiction of state floodway regulations that differ from FEMA's. For example, some states have various requirements for establishing floodways (e.g. 0.0', 0.1', 0.5'). Alterations in standards may require some municipalities and states to change and/or update regulatory requirements.

SID #630 - All preliminary and final FIRM panels, including FIRM attachments submitted with MT-2s, must be developed using the FEMA FIRM panel creation tool.

ASFPM M&ES Committee comments: Mapping partners generally support the standards update since it somewhat eliminates costly cartographics and antiquated practices such as creating negatives of each FIRM panel. FEMA should provide additional clarification on the status of the FEMA FIRM panel creation tool and engage CTPs and other mapping partners on its testing and development. There is a concern from floodplain managers that rural communities may not have the ability to utilize solely digital tools. This may be attributed to poor internet quality and antiquated municipal and/or personal IT systems.

SID #639 - Monthly provider and partner invoices - must match information in the MIP and Integrated Financial Management Information System (IFMIS).

ASFPM M&ES Committee comments: Many CTP partners provided feedback on this new proposed standard. FEMA mapping partners are concerned that the update to SPI and CPI indices will frequently generate out-of-tolerance EV results for many tasks without providing a true indication of the project/task health. The EV performance indices (SPI, CPI) are calculated on a linear format between the task Start and End Dates, which does not provide flexibility to complete work by mapping partners. The baseline timeframes in the MIP also includes quality review periods (performed by PTS contractor), during which there are often pauses in production by the mapping partner while the PTS is conducting the review. There may be two or three iterations in some instances. In fact, this is quite common in Engineering (Hydrology & Hydraulics) and Floodplain Mapping submittals. Mapping partners often deal with inaccurate dates and budgets in the MIP, and duplicate and inappropriate tasks (i.e. tasks that should be assigned to a different partner) that only the RSC/PTS or FEMA can address. Additionally, there will likely be reporting issues arise since most mapping partners internal payment systems take several weeks to receive, process and issue payments. This would also require mapping partners to require their contractors to submit invoices based on MIP timeframes. This standard seems more applicable to PTS contractors than mapping partners such as CTPs and doesn't seem to align with FEMA's strategic goal of simplifying efforts.