



## CASFM Responses to TMAC Questions March 2015

### 1) What issues come to mind as you think about including climate change effects on flood insurance rate maps?

Including climate change on FIRMs seems problematic for riverine floodplains because the effects at a watershed scale are unknown, especially in watersheds with significant vertical elevation gradients in the Western U.S. Also, what would be the time horizon for measuring potential impacts and the future level of greenhouse gas emissions assumed? Finally, FIRMs typically show current conditions since they are used for insurance rating purposes. It seems inappropriate to charge increased premiums for future events, but possibly a new risk zone could be identified for climate change impacts.

### 2) How can the Letter of Map Change process be improved?

Expand the size limit of the LOMR to decrease PMRs. Continue to support the eLOMA process. Improve quality control of the incorporation of LOMRs into DFIRMs and NFHL. Currently, some submittals go through many rounds of review and comment. Encourage state and local delegation for LOMC review to improve coordination and communication between applicants and reviewers.

### 3) How can the Physical Map Revision process be improved?

Need a clear explanation of the process and timelines. It is unclear when a submittal will be a PMR instead of a LOMR. There is a perception that applicants are penalized for doing a PMR instead of a LOMR because the study is forwarded to FEMA and cannot move forward until funding becomes available. The longer wait time for processing compared to LOMRs is problematic. Our FEMA Region has asked for an estimate of the number of PMRs that will take place over the next year. It is very difficult to estimate the number of PMRs when local studies that were intended to be LOMRs are processed as PMRs unexpectedly and when project timelines do not align with FEMA funding timelines. Community notification around PMRs is not uniform and sometimes communities are not aware of new studies conducted by others until the study is nearly complete.

### 4) What happens now when you, or one of your NFIP communities, discover an error on an effective FIRM or in the Flood Insurance Study? How can the process of reporting errors to FEMA and correcting them be improved?

For smaller errors, like a typo in a BFE, the errors are generally sent to the FEMA Region and corrected by the contractor. Larger errors, like shifts in the floodplain data can be very time-consuming to correct, possibly even involving revised preliminary maps. It would be

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strategically advantageous and efficient to establish a standardized process for reporting errors, like a form on the FEMA website that communities could fill out and submit. A database of errors would help to identify patterns. It can be difficult to identify the specific location and nature of suspected errors because sometimes communities and individuals only provide a general description of the problem, so a form with required information would help to locate and address issues. We suspect that the RiskMAP process will reduce the amount of errors identified after the maps have gone effective because communities will have more opportunities to review data during the map process and to provide concurrence at the end of each task.

- 5) 44 CFR 65.3 requires that a community shall notify FEMA of the physical changes affecting flooding conditions by submitting technical or scientific data within 6 months after information about such changes is available. Is this requirement enforced in your region? Should a community be penalized for not providing this information? Should such information be provided as a LOMR, or can the requirement satisfied by sending the information to FEMA for later incorporation into the FIRM the next time FEMA initiates a map update?**

The requirement to submit technical data within 6 months of a project is not uniformly enforced. It is difficult to require a LOMR when the CFR does not explicitly state one is required. There have been many examples in this state where, in the course of completing a LOMR, significant natural changes in the floodplain as well as errors have been identified. It is not reasonable to require communities to correct errors and account for natural changes that balloon the LOMR scope and cost and create political issues for project proponents. However, if communities can simply submit the data for later incorporation into a map update, years will likely go by without a map update and the flood risk on the maps will eventually not reflect the actual risk. Communities would prefer the additional flexibility offered by submitting the data to FEMA without a LOMR requirement, but the current mapping cycle cannot incorporate new data in a timely manner.

- 6) Today, small Letters of Map Revision do not trigger re-issuance of the DFIRM. Should LOMRs be incorporated into DFIRMs on an ongoing basis?**

There was debate on this issue. Many communities in this state use the NFHL through local GIS or the FEMA geoplatform and find the digital products to be sufficient. However, we are aware that some communities still use paper maps. We would prefer a system that trains communities to use digital data and provides digital data for all communities, rather than trying to keep paper maps updated. We recommend at least monthly updates of the NFHL and working towards a more dynamic product that updates automatically.

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**7) How often is it reasonable for FEMA to provide updated FIRMs for re-adoption by local government?**

Communities suggested the states and FEMA work together to encourage automatic adoption. It has been difficult for this state to support automatic adoption and we could work to make it easier. We would like to see the mapping process move away from DFIRMs and towards seamless digital data, not tied to map panels, making frequent re-adoption of map panels unnecessary. Adopting new data can be a very long and time-consuming process, particularly for large communities. Even the six month adoption period is cutting it close sometimes. FEMA should work with the states and reexamine the mapping process to limit re-adoption.

**8) What do you think about digital FIRMs being updated continuously, by watershed?**

We saw that this topic could be seen in two different ways. If FEMA continues to use the map panel format, then we would prefer to continue to have maps published countywide. However, if panels are no longer used and the data is published digitally, then using the watershed boundary would work. We would like to see a process for producing high quality map data quickly that incorporates new data and natural changes.

**Additional topics:**

Quality control in the DFIRM process is becoming an issue. We have been told that FEMA contractors only review 10% of map panels and it is unclear who is ultimately responsible for quality and fixing errors. Local officials with expertise in hydrology and hydraulics have expressed some willingness to review each panel in detail, but that commitment takes time and money and many communities do not have the expertise to take on that role.

In some of the answers above, we discussed the idea of producing floodplain data digitally and possibly moving away from the panel format. We also see value in having one digital source for regulatory data. Producing both DFIRM data and the NFHL leads to discrepancies. We would prefer a process that results in one digital regulatory product that is maintained.

Individual notification of property owners is not required when properties are newly mapped into the floodplain. Sending notifications is a burden on communities and more assistance could be provided.

FEMA produces many helpful documents, but the amount of guidance is becoming overwhelming. Local and state officials need to keep track of Technical Bulletins, Fact Sheets, program guidance, and publications, to name a few examples. While these documents are

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helpful, a local floodplain administrator trying to get a handle on the program can quickly become frustrated. Not all of these documents are aimed at local officials, but many contain essential information that communities will need at some point. FEMA should look for ways to simplify the NFIP and mapping process for local officials and other stakeholders.

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