

**American Congress of Surveying and Mapping  
American Planning Association  
American Public Works Association  
Association of Flood and Stormwater Management Agencies  
Association of State Flood Plain Managers  
National Association of Development Organizations  
National Association of Home Builders  
National Association of Professional Insurance Agents  
National Association of Realtors  
National Flood Determination Association  
National Lenders Insurance Council  
National Wildlife Federation**

July 7, 2005

Mr. Joshua Bolton  
Director  
Office of Management and Budget  
725 17<sup>th</sup> Street, NW  
Washington, DC 20503

Dear Director Bolton:

The National Flood Map Modernization Coalition represents a variety of stakeholders in the surveying, mapping and flood risk determination communities, development, insurance, lending and real estate industries, state, county and municipal government officials, floodplain and emergency management officials, and environmental organizations who regularly rely on and use floodplain maps in their planning, management and advocacy initiatives.

The member organizations of the National Flood Map Modernization Coalition are pleased that the Federal Emergency Management Agency (FEMA) is undertaking efforts to update and modernize its Flood Insurance Rate Maps (FIRMs) through the Flood Map Modernization Initiative. Because the FIRMs form the basis of the National Flood Insurance Program and play a vital role to keep our communities safe from flooding, it is imperative that these maps are accurate. Unfortunately, given the current timeframe for completion and limited resources, we are concerned that FEMA may be sacrificing quality for quantity by updating as many maps as possible instead of updating the maps in a technologically and scientifically sound manner.

FIRMs and the information they contain have a variety of uses at the state and local level. First and foremost, FIRMs are used by planning and economic development officials to direct growth and development, by emergency management and public works officials to help locate transportation infrastructure and plan evacuation routes, and law enforcement officials to plan for security and disaster events. They are also used by surveyors, floodplain managers, home

builders, Realtors, financial institutions and insurance agents to determine whether or not a property is located in a floodplain, and if so, dictate construction specifications and help to define how much flood insurance the property owner is required to purchase at the time of the transaction.

Unfortunately, as a result of limited resources to maintain the FIRMs and the dynamic nature of floodplains themselves, many of these maps have become out-of-date and inaccurate. In 1996, in an effort to address these shortcomings, FEMA proposed an \$800 million map modernization program to remap high risk floodplains in the country and to place this new mapping information into an interactive, digitized format. In FY 2003, the Administration requested \$200 million for the first year of a projected five year Map Modernization Presidential Initiative. Congress agreed with the importance of this mitigation effort and provided FEMA with appropriations of \$200 million in 2003, 2004 and 2005 to scope, develop and initiate the remapping and digitizing process. There is also a \$200 million budget request for FY 2006.

A key parameter for evaluating the initiative was progress toward a goal of mapping 100% of the population in five years. Yet, as the Map Modernization Initiative has proceeded, it has become clear to FEMA and state, local and industry stakeholders that the project is more complex, extensive, and costly than originally estimated. A number of the assumptions that FEMA made to produce the original cost and time estimates underestimated the scope of mapping needs, but became obvious only after the project began. For example, it was not until the project had moved forward that all stakeholders appreciated the need to retain the old maps for critical referencing data, and needed to address storage and accessibility requirements for these old maps within the new digitized format. These are the kinds of unforeseen factors that become apparent after a project has started, and can lead to delays and cost increases.

In some areas of little growth, the existing data may continue to be accurate. In many areas, it is not. Some early maps have caused concern because the floodplain does not match the existing topographic data. Creating, digitizing and making available inaccurate maps fails to solve the initial problems associated with outdated maps and will continue to have far-reaching implications. First, communities will remain at risk and its citizens will be placed in harm's way if a flood map identifies the floodplain and its associated landforms incorrectly. Communities will balk at adopting these maps, because they do not resolve their flood map problems or improve what they have currently. Taxpayers will be dissatisfied with spending nearly one billion taxpayer dollars for maps that fail to identify hazards and slow down or delay property transactions. When Congress becomes aware of these flood map problems, a backlash may occur that could impair future funding for technically correct maps.

The first of the modernized (but not necessarily updated) flood maps are beginning to come out of the pipeline and FEMA estimates that maps covering areas that are home to 80 million people will be released by the end of September, 2005. After extensive discussion with members of the

National Flood Map Modernization Coalition, FEMA has adopted a quality assurance procedure that provides for matching the best available topographic data or reflects current conditions, for all the maps going forward.

The Coalition believes this is a matter that can be addressed with the active and direct involvement and leadership of OMB, and considers a three-pronged approach to be the best way to focus on the concerns regarding FEMA's Map Modernization project.

- The timeframe for creating and digitizing the new maps needs to be adjusted. Instead of mapping 100% of communities in the first five years of the program, which could mean rushing the process and producing inaccurate maps, FEMA should refocus on mapping a smaller percent of the most at-risk communities with high quality maps. As new surveys and engineering studies are more expensive and time-consuming than digitizing existing data, this refocusing strategy will require additional time to complete all of the necessary updates, but will ensure a better quality output. The Coalition also believes that the objectives of an extended map modernization program can be fulfilled at the current level of annual funding if those annual appropriations are allowed to be extended over a longer period of time.
- The maps that need to be updated need to be reprioritized. FEMA should conduct a new prioritization process to determine which maps need to be restudied, and when. Not all stream miles in all communities will need to be studied, nor will all the hydrologic/hydraulic data need to be updated. In addition, a reprioritization process will create efficiencies in the program that will help create new maps where they are needed most.
- Those maps that are being issued prior to the implementation of the quality assurance standard will need to be re-evaluated and completed to ensure the data they contain is the most updated and accurate.

The Coalition is very appreciative of the Administration's commitment to the Map Modernization project. Our observations and suggestions are offered to assist OMB and FEMA in your efforts to produce the modernized and updated maps we all agree are needed. Please contact Merrie Inderfurth at 703-448-0245 or Russell Riggs at 202-383-1259 if you have any questions regarding these comments and observations.

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