February 4, 2005

David I. Maurostad
Director, Mitigation Directorate
Federal Emergency Management Agency
U.S. Department of Homeland Security
500 C Street, S.W.
Washington, DC 20572

Subject: MHIP Comments From DuPage County, Illinois

Dear Mr. Maurostad:

DuPage County would like to thank you for the opportunity to provide comments on the Multi-Year Flood Hazard Identification Plan (MHIP). We applaud this document's intent of establishing a framework of the multi-year Flood Map Modernization program and FEMA's efforts to address the nation's flood hazard mapping program. As the first county Cooperating Technical Partner (CTP), DuPage County is committed to working with FEMA in the area of floodplain management and map modernization. To that end, the MHIP is critical component to the success of the Map Modernization effort.

We strongly support and appreciate the Administration's initiative for this round of the Map Modernization effort. However, upon review of the MHIP, DuPage County has identified concerns we feel FEMA should address in future updates to the MHIP.

The MHIP has tried to demonstrate that all communities in the nation will be mapped adequately with the stated funding allocation, but based on our situation, the results will be less than adequate. The MHIP identifies no funding for DuPage County, yet takes credit for DuPage County being an early success since a new Countywide Map became effective in 2004. This new map was achieved through a digital conversion, where the current data was digitized and matched against the County's better topography. The MHIP makes no provision for new studies in DuPage County in this initial round or in the future. More than 80% of the current effective studies in DuPage County are more than 20 years old. Between 1980 and 2003, the County's population grew from 658,835 to 925,188, more than a 40% increase. This residential growth, along with significant non-residential development, has significantly impacted the hydrology and hydraulics of the County watersheds. While errors, updates, and completed restudies were incorporated in the County's new maps, it would be unreasonable to expect that the digital conversions completed in this round of mapping will adequately address the current or long-term flood mapping needs of DuPage County. The effective flood studies and maps need to be
updated to reflect the actual flood risks to the County’s 4,218 Flood Insurance Policy holders as well as those who are at risk but not identified by the current effective information.

DuPage County is strongly committed to improving the floodplain maps. Using local funds almost exclusively, the County has already completed two tributary basin-wide restudies and has seventeen restudies currently in production out of fifty-four identified tributary basins in the County. Of these nineteen restudies, only two have received CTP funding support. As one of the leading CTP programs in a highly urbanized and populated area, we believe it is reasonable to expect strong support from FEMA through the CTP Program in order to continue this effort to update DuPage County’s floodplain studies. The MHIP makes no provision for reviewing, updating, or printing new floodplain maps based upon these new detailed studies. The MHIP is the appropriate document to establish both the current and long-term floodplain mapping needs of DuPage County as well as the mutual long-term goals of reducing existing damages and preventing future flood losses.

It is imperative that the MHIP address future study, maintenance, and mapping needs. As stated in 42 USC 4101(a), Congress would expect a comprehensive nationwide review of flooding risk to occur over a fifteen-year period. The MHIP must address both current and future mapping needs. In addition to addressing the long-term needs, the MHIP needs to provide a legitimate funding estimate to meet current Map Modernization needs. DuPage County and the nation will be better served by establishing a comprehensive plan that ensures every map produced is reliable and accurate for the floodplains it maps, so that it supports floodplain management, insurance, and does not unfairly impact property owners.

Should you have any questions or need additional information, please feel free to contact DuPage County staff. Our contact information is as follows: Anthony Charlton (630) 407-6688 [Anthony.Charlton@dupageco.org], or Bill Brown (630) 407-6714 [Bill.Brown@dupageco.org]. Once again, we thank you for the opportunity to provide input to the MHIP and look forward to working closely with you to make it a stronger tool for your effort to modernize the nation’s flood maps.

Respectfully,

Robert J. Schillerstrom, Chairman
DuPage County Board
Committee

James F. Zay Jr., Chairman
Stormwater Management Planning Committee

CC: Anthony J. Charlton, Director, DuPage County
    Bill Brown, Sr. Project Engineer, DuPage County
    Mike Howard, FEMA
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