January 31, 2005

David I. Maurstad
Director, Mitigation Directorate
Federal Emergency Management Agency
U.S. Department of Homeland Security
500 C Street S.W.
Washington, DC 20472

Subject: MHIP Comments

Dear Mr. Maurstad:

Thank you for the opportunity to comment on the Multi-Year Flood Hazard Identification Plan (MHIP), which establishes the outline for FEMA’s ambitious Map Modernization Program. As one of the oldest State Floodplain Chapters, we are strongly committed to supporting the Map Modernization initiative. While we support the overall concept of Map Modernization, we are concerned about some directions taken by FEMA, as outlined in the MHIP.

Our first concern is in regard to the overall Map Modernization program. FEMA has made a decision, as documented in the MHIP, which we feel is misguided and counter-productive to our common goal of providing accurate flood maps throughout the nation. The philosophy of Map Modernization should be to provide high quality mapping for as far as the money will go and advocate for mapping dollars for the remainder of the state later. This would result in acceptable, quality maps for most of the developed and developing areas of the state. We feel that the only way to produce quality DFIRM’s for the entire state would be to extend Map Modernization funding beyond the five-year period. The approach proposed in the current MHIP will result in substandard work if all counties are to be completed within the five-year period at the stated funding level. The Map Modernization commitment should be extended to provide adequate time to get the job done right.

Our second concern has to do with the funding of Map Modernization. Under the current MHIP, there will be sufficient funding to do little more than digitize flood themes from existing maps. One emphasis of Map Modernization is the use of updated, digital orthophotography for base mapping. This is an excellent strategy, but without adequate funding to rectify the flood themes to more accurate base maps the result will be poor quality cartographic products where flood themes do not follow stream and rivers. This will undermine the credibility of the floodplain maps and the program. Further, many errors on existing maps will continue to appear on the new maps if only a simple digital conversion is performed.

Proposed funding levels fall far short of addressing issues such as disconnected studies at community boundaries, inaccurate and out of date hydrologic, and hydraulic studies. Out of date studies will continue to appear on newly issued maps. Many effective flood studies and maps do not adequately reflect the current flood risks to the State’s 45,370 Flood Insurance Policy holders as well as those who are at risk but not identified by outdated information. This will lead to higher than necessary flood
damages and continued upward spiraling costs to individuals and FEMA for LOMC’s. While there has been some indication that the needed detailed mapping will follow later, we fear that tomorrow may never come again. The MHIP needs to clearly identify how future maintenance of the maps will be achieved.

We are also concerned about the funding being provided to the states and local partners. We are aware that many States, including Illinois produced a Flood Mapping Program Business Plan, as directed by FEMA. It is our understanding that the funding allocated in the MHIP falls significantly short of the cost outlined in these State Business Plans and the cost of meeting FEMA’s current goals of Map Modernization. We are committed to supporting state and local contributions of funding and products sufficient to reduce the federal mapping cost, but we feel the MHIP should reflect the estimates of the State Business Plans and provide a true cost estimate for both the initial and long-term maintenance phases of Map Modernization.

Map Modernization is at a crossroad and FEMA has three choices. It can advocate for more funding to complete the task within the five-year period based on the more realistic data in the State Business Plans. It can admit that the current five year plan is insufficient to complete the necessary task of quality flood mapping nation-wide and advocate for a lengthier funding period. Or it can continue on the current path and produce high-tech DFIRM’s that contain out of date and incorrect data. The latter option will certainly result in a backlash from the states, communities, and parties concerned about accurate floodplain mapping.

IAFSM advocates that available dollars be used to produce high quality DFIRM’s. We feel that rather than argue for more funding on an annual basis at a time when the Map Mod community is still gearing up, we should work for additional years at the end of the current five-year period to complete the task of DFIRM mapping for the entire state.

Should you have any questions, please feel free to contact IAFSM at any time should you have any questions or comments. We look forward to continuing to work with FEMA and our members to produce quality DFIRM’s throughout Illinois.

Sincerely,

Gerald L. Robinson, P.E., CFM
Chair, Illinois Association for Floodplain & Stormwater Management

cc: Mike Howard, FEMA
Norbert Swartz, FEMA Region V
Ken Hinterlong, FEMA Region V
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