Mr. David I. Maurstad  
Director, Mitigation Directorate  
Federal Emergency Management Agency  
500 C. Street S.W.  
Washington, DC 20472

Dear Mr. Maurstad:

The NYSFSMA is an organization dedicated to the promotion and support of sound Floodplain and Stormwater Management including the National Flood Insurance Program (NFIP). Representing almost 1500 flood prone communities, professional architects, engineers and surveyors within the state including multitudes of flood prone residents, we strive to make these important programs effective and user friendly. It is a goal of our Map Advisory Committee to review the efforts and initiatives undertaken to improve the accuracy and reliability of the State’s flood mapping. Accordingly, we would like to comment on the Multi-Year Flood Hazard Identification Plan (MHIP), which establishes the outline for FEMA’s ambitious Map Modernization Program.

In March, 2004, the NYSDEC produced a Flood Mapping Program Business Plan, as directed by FEMA. In that plan, they carefully reviewed flood mapping needs in New York State with a goal of updating flood mapping state-wide to provide communities with new maps that are completely digital and GIS compatible and that also provide accurate flood hazard information. They estimated that it would cost $106 million to reach the goal of up to date accurate mapping throughout New York State.

The NYSDEC recognized that this is far more money than could be expected from the Map Modernization funding and are committed to obtaining state and local contributions to reduce the federal mapping cost. Even with these efforts, the available funding is limited and may be insufficient to satisfy the flood mapping needs of the entire state. However, the consensus has always been that accurate, high quality flood maps are the foremost priority. In fact, high quality, accurate map products are necessity if the integrity of the NFIP is to be re-established.

This last month, the NYSDEC informed us that FEMA has issued a directive that available mapping funds must be used to produce digital flood maps state-wide. This means that available funds will be diverted from the development of accurate / up to date map products for the priority parts of the State, and instead will be used to primarily reformat poor quality / out of date information. We find this situation to be unacceptable and feel that such an approach will further damage the integrity of the NFIP, and the perhaps the entire professional community of Floodplain Managers.
We strongly urge that FEMA reconsider this position and allow NYSDEC to reinstate the previous approach, which would result in quality flood maps for over 3/4 of the state's population. We believe that this approach will provide demonstrable benefits that will encourage future investment in sound floodplain management. We fear that a lesser approach will emphasize the current weakness of poor quality flood maps that currently plagues the NFIP, and result in deteriorating support for the flood mapping program as a whole.

Please feel free to contact me at any time should you have any questions or comments about our concerns. We hope to be able to continue our support for FEMA’s efforts to produce quality DFIRMs throughout New York.

Sincerely,

Alton E. Knapp, Jr. CFM  
Chairman

cc: Mike Howard, FEMA  
Mary Colvin, FEMA Region 2, New York City  
Paul Weberg, FEMA Region 2, New York City  
Larry Larson, Executive Director, ASFPM