January 31, 2005

Mr. David I. Maurstad  
Director, Mitigation Directorate  
Federal Emergency Management Agency  
500 C. Street S.W.  
Washington, DC 20572

Dear Mr. Maurstad:

The purpose of this letter is to comment on the Multi-Year Flood Hazard Identification Plan (MHIP), which establishes the outline for FEMAs ambitious Map Modernization Program. The State of South Dakota strongly supports floodplain Map Modernization, and believes that publication of the MHIP (and the planned annual publication of new editions in the future) represents a great step forward toward accomplishment of this project. Within South Dakota our concerns related to floodplain Map Modernization as outlined in the MHIP are related to scope, schedule, and budget.

Scope. It is our belief that every incorporated municipality with a flooding source deserves a Flood Insurance Rate Map (FIRM) with published base flood elevations (BFEs). If the nation cannot afford detailed studies within every town at this time, then we believe an Approximate Zone A delineation is acceptable as a temporary measure. However, prior to digitization, we believe that it is appropriate to review available hydrologic and topographic information in order to determine whether an existing FIRM meets the accuracy guidelines described in the MHIP.

There are a number of communities that do not currently have a FIRM. However, the state has been told by Region VIII personnel that existing maps will be digitized with very little new study, and that FIRMs will not be created for communities that are not in the National Flood Insurance program. This leads to a chicken-and-egg problem: it is unlikely that communities will join the program without a map, and they cannot get a map without joining. The State desires that all communities be mapped within a county (even if it is just Approximate Zone A mapping) before the county can be considered completed.

Schedule. South Dakota has 66 counties. During the first three years of Map Modernization fewer than ten counties will be funded to completion. In fact, at this time Region VIII is planning only one new project for FY 2005 funding (digitizing Pennington County). Therefore, in order to complete floodplain mapping in South Dakota during the planned five years of map modernization funding it will be necessary to fund and begin 20 to 30 countywide projects each year. It is unlikely that this will be accomplished.

Budget. South Dakota, as is typical for Region VIII, has a low population and a small flood insurance base compared with the rest of the nation. Therefore, the Map Modernization funding going to South
Dakota is very low compared with funds planned for many other states. While we understand that FEMA is working with limited funding allocated by Congress, and FEMA is dividing the mapping dollars as fairly as possible, the low funding leads to unrealistically low budgets for counties with low populations.

The State of South Dakota is interested in working with FEMA to resolve the issues of scope, schedule, and budget. We believe that it is important to continue with a few high-quality studies each year rather than trying to begin 20 to 30 poorly-funded projects per year. In order to properly map the state within the quality guidelines described in the MHIP, it may be necessary to request that Congress extend Map Modernization for another five years (or more). The State is excited about joining the mapping process as a Cooperating Technical Partner, and will work to create mapping efficiencies and partnerships in order to maximize each mapping dollar.

Please feel free to contact me at any time should you have any questions or comments. We look forward to continuing to work with FEMA to produce quality DFIRMs in South Dakota.

Sincerely,

[Signature]

MICHELLE SAXMAN, CFM
South Dakota NFIP Coordinator
&
James R. Williams, P.E.
Antelope Creek Engineering & Technology (MMMS contractor)

cc: Mike Howard, FEMA
Larry Larson, Executive Director, ASFPM