Michael Howard, Chief  
Risk Identification Branch  
Federal Emergency Management Agency  
U.S. Department of Homeland Security  
500 C. Street, SW Room 423  
Washington, DC 20472

Dear Mr. Howard:

The Texas Colorado River Floodplain Coalition (TCRFC) is a network of more than fifty cities and counties with a population of more than two million people in the lower Colorado River basin working together to reduce flood damages and improve floodplain management through robust local programs and regional partnerships. We applaud FEMA’s efforts to address the nation’s flood hazard mapping needs and appreciate this opportunity to share our feedback regarding the Multi-Year Flood Hazard Identification Plan (MHIP).

**TCRFC Map Master Plan**

In 2001, FEMA awarded funding under its Best Mapping Practices program for the development of a map master plan, *Mapping the Lower Colorado River Basin* to the Lower Colorado River Authority (LCRA) as a Cooperating Technical Partner and on behalf of the TCRFC. The TCRFC map master plan was provided to FEMA as direct guidance articulating local mapping needs and priorities, funding options and availability of updated hydrologic data to support mapping efforts. The costs of these non-FEMA funded contributions and technical studies exceeded $1.5 million. In the absence of a substantive State Plan for Texas, and considering the substantial amount of time, effort and both local and federal funds invested, we would appreciate an assurance that this important input is being considered and fully used by FEMA.

**Availability of Valuable Data**

Given anticipated federal funding levels for the multi-year MHIP, many miles of stream and coastline will not be able to be mapped in detail; this is understandable. FEMA’s map modernization efforts are most cost-effective and successful where they make highest use of available data. This is the essence of the Cooperating Technical Partners (CTP) program, a high water mark of local, regional, state and federal cooperation.

Given the availability of valuable hydrologic data for the Lower Colorado River main stem developed by the Lower Colorado River Authority and the U.S. Army Corps of Engineers Study, we would like a better understanding of the extent to which FEMA intends to incorporate the data. TCRFC member communities who have come to rely on this best available data would be poorly served by the...
development of new maps that did not reflect base flood elevations and floodways.

We share with many states, associations and other organizations concerns regarding the scope and level of technical detail anticipated through this multi-year effort as reflected in the MHIP in its current form. We are also aware of the time and funding constraints under which FEMA is working to make digital maps of the level of needed detail available across the nation.

The MHIP was originally conceived to lay out FEMA's plan for producing updated, digital flood maps for the nation. Based on recent experience with map projects in the lower Colorado River basin, and as reflected in the MHIP funding allocations, many miles of stream and coast will not be mapped in this current multi-year effort. However, community leaders and the public maintain an expectation that the new map products to be produced through the MHIP will include detailed studies based on local planning needs.

TCRFC is uniquely positioned and willing to help FEMA correct misconceptions and establish realistic expectations of what can be delivered given existing constraints. The MHIP would benefit tremendously from the addition of plans to perform needed detailed work and to maintain maps once they are produced.

On behalf of the community leaders of the TCRFC, we appreciate your efforts to incorporate this feedback into the refinement of the MHIP. We look forward to your reply and hope that we can report back to our members soon with a favorable response from FEMA. Please feel free to contact me at the address below, via email at dmontalvo@cityofwharton.com or at 979-533-2328.

Sincerely,

Domingo Montalvo, Jr.
TCRFC Chairman
Wharton City Councilmember

DM/JO:sm

CC:  Gary Jones, Acting Director, FEMA Region VI
     Mike Howard, NFIP Coordinator, State of Texas
     Frank Cantu, Assistant State Coordinator, Texas Division of Emergency Management
     Joe Beal, General Manager, Lower Colorado River Authority
     Larry Larson, Executive Director, Association of State Floodplain Managers (ASFPM)
     Chad Berginnis, Chair, ASFPM