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

Dear Mr. Maurstad:

Thank you for the opportunity to comment on the Multi-Year Flood Hazard Identification Plan (MHIP). The Texas Floodplain Management Association (TFMA) is a Chapter of the Association of State Floodplain Managers (ASFPM) and includes a membership of over 700 floodplain managers from both the public and private sectors.

The TFMA has been a long time advocate for sound floodplain management, a strong supporter of the goals and objectives of the National Flood Insurance Program, and an active partner in FEMA’s Map Modernization Initiative. However, TFMA has concerns with the overall approach demonstrated by the FY 2003 and FY 2004 Map Modernization progress and the proposed MHIP activities proposed for FY 2005 through FY 2008. It appears that FEMA is more concerned in converting existing out-of-date floodplain mapping to digital flood insurance mapping than to updating hydrology, hydraulic analysis, and accurate base flood elevations badly needed by communities to implement sound floodplain management programs.

We congratulate FEMA for an excellent effort in remapping Harris County following Tropical Storm Allison in 2001, however the $25 Million massive flood recovery mapping effort, that included over 1,700 square miles of new county-wide LIDAR mapping, updated hydrology, updated hydraulics, new field surveyed channel cross sections, and new elevation reference marks for over 1,300 stream miles, sent a confusing message to other Texas communities that this was an example of the FEMA Map Modernization effort. The remapping effort initiated in FY 2003 and FY 2004, and the proposed MHIP, indicates a minimal flood insurance study and remapping effort is proposed for the majority of Texas Counties and that the remapping effort will simply be digital conversion of existing 20+ year old floodplain mapping.

During a review of the MHIP, members of TFMA have pointed out major concerns that include:

1. Minimal county-wide remapping effort is proposed for over 50% of the 254 Texas counties.

A minimal county-wide remapping effort is proposed for a large number of Texas counties. The Detailed Production Report in Appendix “A” of MHIP describes the estimated county-wide remapping cost to be between $126,000 and $158,000 per county for over 50% of the 254 Texas Counties. Many of the counties identified for this minimal remapping effort have
experienced minimal growth; have never received a “detail” flood insurance study; currently have 1970’s Flood Hazard Boundary Maps (FHBM) that have been converted to FIRMs by letter; and several have never been mapped with either a FHBM or FIRM. The TFMA questions the benefit expected from a minimal mapping effort that obviously does not include a “detail” flood insurance study effort since average costs range between $10,000 and $15,000 per studied stream mile. Many of the Texas counties targeted to receive this minimal effort are 1,000 square miles or larger in area indicating that any remapping effort that produces a useful floodplain management product should easily cost far more than the $126,000 to $158,000 effort planned.

2. Minimal remapping effort is proposed for large metropolitan and rapidly development areas.

Many large metropolitan and rapid development areas in Texas have experienced major growth and currently have out-of-date technical data needed for sound floodplain management. A remapping effort in these areas must include updated hydrology, hydraulics, field surveyed channel cross sections, topographic mapping and digital floodplain mapping. The proposed remapping effort for many of these areas, as outlined in MHIP, indicates a minimal effort is proposed, far less than the $10,000 to $15,000 per stream mile cost required to perform a detail flood insurance study. The San Antonio River Authority (SARA) is contributing approximately $8.5 Million to the Bexar County restudy effort and the FEMA (MHIP) remapping funding is estimated as $1.785 Million. Bexar County and the City of San Antonio have experienced one of the most rapidly growth rates in the Southwest United States and a overall remapping cost of $10 Million is warranted.

The Bexar County remapping experience appears to repeat with the North Central Texas Council of Government’s 16 county planning area that includes the Dallas/Fort Worth metroplex, the Houston Galveston Area Counsel’s 14 county planning area that includes the City of Houston, the Capital Area Planning Council’s 10 county planning area that includes the City of Austin.

The common thread in the four major growth areas listed above is that FEMA proposes to fund only a minimal remapping effort and if the individual communities desire to have more detail information they must fund the additional study and remapping effort. The various studies that have been initiated in FY 2003 and FY 2004 include minimal “detail” study and many streams will only receive either a “limited detail study” or “approximate study” effort. FEMA’s Harris County remapping effort, following Tropical Storm Allison, consisted primarily of “detail study” and little or no “limited detail study” and “approximate study” streams.

3. Hays County is proposed to receive no study effort in MHIP.

In 2003 and 2004, Hays County prepared a Mitigation Action Plan that was submitted to FEMA Region VI. The Plan, that was formally adopted by Hays County and incorporated
communities, identified an action item (F-7) to develop DFIRM’s and HAZUS mapping throughout Hays County. Both the Hays County Mitigation Plan and the Hays County Map Needs Update Support System (MNUSS) that were submitted to FEMA describe out-of-date floodplain mapping in Hays County and the need for updated hydrology, hydraulics, field survey channel cross sections, flood profiles and floodplain mapping. The 40 FIRM panels in Hays County are dated 1998 but the technical data used to develop the FIRM’s was over 12 years old in 2003.

In August 2004, and unknown to Hays County and the eleven incorporated communities including the City of San Marcos, the largest community and only CRS community in Hays County, FEMA performed a digital conversion of the existing Hays County FIRM’s and published Preliminary Digital FIRM’s. There was no study performed. There was no coordination between FEMA, Hays County, Hays County communities or the Texas Commission on Environmental Quality, the State NFIP Coordinator, during the digital conversion process. After further investigation it was discovered that the only difference between the existing FIRM’s and the digital conversion FIRM’s is that the digital FIRM’s are based on NAVD 1988 Datum and the existing FIRM’s are based on NGVD 1929 Datum. Since the difference between NAVD 1988 and NGVD 1929 in Hays County is less than 0.5 feet, and within FEMA’s mapping accuracy, there were no adjustments to the BFE’s and floodplain boundaries. There are many concerns related to this action by FEMA. The mapping needs expressed by Hays County have been ignored by FEMA and there is no remapping effort proposed for Hays County in MHIP. Hays County is bisected by Interstate Highway 35 and located midway between Austin and San Antonio. The growth rate for this area is one of the fastest in Texas and county-wide development pressures effect every floodplain area in the county which fall into two categories: (1) No detail study has been performed and floodplains are either Zone A (un-numbered) with no BFE’s or floodways defined, or (2) Existing floodplain mapping is out-of-date and updated hydrology, hydraulic analysis, field surveying, topographic mapping and floodplain mapping is needed.

4. No detail study is proposed for the Rio Grande.

The International Boundary and Water Commission (IBWC) has stated that the Rio Grande flood protection levees were not constructed to FEMA and Corps of Engineers standards and “sections” of the levee system would either be overtopped or fail during occurrence of the 100-year flood event. The IBWC said that they will not certify that the Rio Grande levee system provides 100-year flood protection although the flood insurance studies and FIRM’s published by FEMA show the Rio Grande as providing protection from the 100-year flood event. The problem is compounded because the existing flood insurance studies for Texas communities that border the Rio Grande do not include flood profiles or flood data for the Rio Grande.

In FY 2004, FEMA initiated a remapping effort for El Paso County, Texas and Dona Ana County, New Mexico. These two counties border on the Rio Grande and existing FIRM’s incorrectly show the Rio Grande levees as providing 100-year protection, however no detail study effort is proposed in the ongoing remapping effort for the Rio Grande. The MHIP
proposes addition county-wide studies for the other Rio Grande Counties to be initiated in FY 2005 through FY 2008. However, it appears that the major flood threat (Rio Grande) in these counties will be ignored by FEMA. The TFMA recommends that the Rio Grande be studied as part of the proposed Map Modernization effort and added to the MHIP.

The Texas Floodplain Management Association commends FEMA for this massive undertaking to remap the United States, however we strongly support the MHIP issues recently identified by the Missouri Floodplain and Stormwater Managers Association and the New York State Department of Environmental Conservation. TFMA recommends that FEMA reevaluate the proposed effort as outlined in MHIP to ensure that the final product will meet the floodplain management needs of the 20,000 NFIP communities.

Sincerely,

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cc: Gary Jones, Acting Director, FEMA Region VI, Denton, Texas
Mike Howard, CFM, State NFIP Coordinator, TCEQ
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