January 31, 2005

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

Subject: Preliminary MHIP Comments From ASFPM
Mapping and Engineering Standards Committee

Dear Mr. Howard:

In cooperation with the Association of State Floodplain Managers (ASFPM) the State of Washington is requesting a comprehensive review of FEMA’s Multi-Year Flood Hazard Identification Plan (MHIP) and incorporations of modifications to that plan as identified in this letter and preceding letters on this topic from ASFPM.

To concur with the concerns from ASFPM and other States, the State of Washington believes strongly in the necessity for improved map quality leading to improved digital mapping tools. Improved accuracy in these tools is the principal argument for updating flood hazard maps in Washington State. The State aggressively campaigned for Map Modernization over the past five years with the focus on quality and updated accuracies as its primary message. The State of Washington is deeply concerned that underestimating the value of reliable data as the foundation of these map updates will have a damaging effect on the participation of stakeholders and ultimately the adoption of new digital flood insurance rate maps (DFIRMs).

The State has been a Cooperating Technical Partner since February 2001 and has committed staff and resources towards the advancement of Map Modernization in Washington. The State firmly believes in the necessity for new and improved flood hazard maps to maximize the effectiveness of the NFIP and State Floodplain Management Programs. The State has demonstrated its ability to perform Map Modernization activities with very capable and cost effective means. Moreover, Washington’s ability to leverage state and local funding clearly
exceeds the national goals. The State has actively pursued several overarching goals of the program including establishing local ownership of these new tools. Nevertheless, the State is convinced that this objective will be difficult to achieve if local governments and stakeholders are troubled by the underlying information contained on the maps.

Washington State recommends that FEMA address these concerns as argued in ASFPM’s proposal. Foremost, incorporate funding estimates provided by the State in the 2004 and 2005 Business plans. These plans outline rational budgets and demonstrate cost effectiveness in restudies and digital conversions. In addition, develop realistic schedules for completion that incorporate priority restudies prior to conversion. The State Business Plans provide three levels of priority of which high priorities should be the minimum acceptable effort.

Please feel free to contact Washington State’s NFIP Coordinator for clarification or expanded discussions on this subject.

Respectfully,

Dan Sokol
NFIP State Coordinator
PO Box 47600  Olympia, WA  98504-7600
Phone: 360-407-6796  Fax: 360-407-6902
Email: dsok461@ecy.wa.gov

Jerry Franklin
Flood Mapping Coordinator
PO Box 47600  Olympia, WA  98504-7600
Phone: 360-407-7470  Fax: 360-407-6902
Email: jfra461@ecy.wa.gov

Cc: Larry Larson, Executive Director ASFPM
    Mark Carey, FEMA Region X