



MnAFPM
Minnesota Association of Floodplain Managers

January 25, 2005

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

Re: MHIP Comments by MnAFPM

Dear Mr. Howard:

The Minnesota Association of Floodplain Managers (MnAFPM) is grateful for the opportunity to provide comments on FEMA's Multi-Year Flood Hazard Identification Plan (MHIP). Our comments are based on a review of the MHIP and Minnesota Map Modernization Business Plan.

FEMA's Flood Maps are Critical for MnAFPM Members

MnAFPM was founded in 2002 with a goal to improve the effectiveness and efficiency of all aspects of floodplain management in the State of Minnesota. The Association is comprised of:

- City and County Officials
- Consulting Engineers and Surveyors
- State Government: DNR, DEM, and DOT
- Watershed Districts
- FEMA, USCOE, USGS, NRCS

The members of MnAFPM are enthusiastic about this opportunity that our constituents have to obtain improved flood maps and associated data. As you are aware, the floodplain maps that are currently in use today are outdated, difficult to use, and do not represent current conditions. These maps are used on a daily basis by most of the MnAFPM members for critical decisions involving public safety. The current maps are not easy to use because of poor quality data and inaccuracies.

Minnesota's mission, as stated in the Minnesota Map Modernization Business Plan is *"To produce (for every Minnesota county) accurate, digital countywide floodplain maps that are usable to local officials, lending institutions and insurance agents and to produce them using available information and new information, including high resolution digital elevation data, funded from FEMA's Map Modernization Program funds."*

Several MnAFPM members from CTP communities are currently in the process of updating the information on their flood maps and producing digital maps. These communities have received the FEMA funding that they needed to ensure that the final maps are not just an electronic version of the current maps, but the new maps represent more current information and provide a more realistic estimate of the flooding potential because the analyses were revised using current standards and technology. These communities are praising the benefits of the Map Modernization program because of the improvements in the data that they expect from the final digital maps. The new maps will not just be easier to use, but they will more accurately represent expected flood zones.

Comments on MHIP Document

The MHIP document is very clear as it lays out the goals for the Map Modernization project (as referenced in the attached MHIP excerpts), and include:

- Reducing flood damages
- Providing flood maps and data that are more accurate, easier to use, and more readily available
- Using proven and reliable technologies
- Improving the quality and accuracy of national flood hazard data
- Ensuring a high level of quality for all studies
- Spending taxpayer dollars wisely
- Improving public safety

These are excellent goals and if achieved, appear to achieve the Key Performance Parameters (KPP) for Map Modernization to "increase the safety for at least 85 percent of the U.S. population through availability of accurate flood risk data in GIS format" (Section 1.5).

However, after reviewing the funding levels listed in Appendices A and D, the MnAFPM believes that FEMA's goals listed in the MHIP cannot be achieved in Minnesota communities. The funding levels will allow Minnesota communities to update the format of the data, not the quality of the maps. This will not achieve the goals listed in MHIP and will promote a large volume of digital maps, not high quality maps. Flood damages will not be lowered because the maps do not accurately depict the potential for flooding and public safety will continue to be at risk.

The current funding for the State of Minnesota does not allow for improvements to the maps based on new topography or changes to the hydrology and hydraulics with 30 additional years of data and better technologies. The current funding would only cover 63 percent of the costs for conversion into digital format, with no improvements to the data or maps. Additional funding of \$19 million would be necessary for Minnesota communities to meet the goals listed in the MHIP.

It appears that other states are in similar situations, and that the level of funding is low nationwide. Therefore, the goals of MHIP cannot be achieved and the program risks losing credibility over the long-term.

FEMA must acknowledge that the current level of funding will not achieve the MHIP goals and revise the MHIP or request additional funding and possibly extend the deadlines.

Summary

While the members of MnAFPM are eager to obtain improved flood maps that are easier to use, we believe that at the existing funding levels the maps will only be more readily available and will not be any more accurate than when they were first developed in the 1970's. These flood maps are outdated and do not represent current conditions. The MnAFPM members use these maps on a daily basis for critical decisions involving public safety, and the current maps are both inaccurate and difficult to use.

The goals listed in the MHIP for Minnesota are not achievable with the current level of funding and proceeding with this plan would not meet Minnesota's complete, long-term flood mapping needs as set forth by Congress and would be a misuse of Federal taxpayer dollars. Congress must be made aware that in order for the program to be successful in Minnesota, additional funding of \$19 million must be allocated. The program deadlines could be extended to reduce the financial burden on the nation. If additional funding is not allocated, the MHIP must be revised to focus the funding within Minnesota and ensure that the maps that are produced are reliable and accurate so that they support the existing floodplain programs.

Thank you for the opportunity to provide input on the MHIP. We would be happy to provide more information or participate in further discussions. Please feel free to contact us.

Sincerely,

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References to MHIP Goals

1. Damage could be reduced significantly by providing timely and accurate flood hazard information to the public so the public and community officials can make more informed decision about their risk (Executive Summary, ES-1)
2. Map Modernization will enable FEMA to provide flood maps and data for communities nationwide that are more accurate, easier to use, and more readily available than ever before (Executive Summary, ES-1)
3. FEMA's vision for this nationwide undertaking provides measurable results while spending taxpayer dollars wisely (Executive Summary, ES-1)
4. Continue to improve the quality and accuracy of national flood hazard data by developing GIS-based products with reliable technologies that meet enhanced technical standards (Executive Summary, ES-2)
5. Ultimately, FEMA's goal is to improve public safety through the availability of reliable flood risk data (Executive Summary, ES-3)
6. Map Modernization will provide the Nation with modernized maps (that is, up-to-date, reliable, digital flood hazard data in GIS format) (Executive Summary, ES-3)
7. FEMA is committed to delivering high-quality mapping products to its stakeholders using proven and reliable technologies (Section 7.1)
8. Stakeholders have clearly expressed concerns that simply digitizing the existing maps will not result in reliable products (Section 7.1)
9. Ensuring a high level of quality for all studies is critical for Map Modernization (Section 7.1)
10. FEMA plans to focus resources commensurate with flood risk (Section 7.2)