



# Federal Emergency Management Agency

Washington, D.C. 20472

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**[Original Signed]**

FROM: Matthew B. Miller, P.E., Chief  
Hazards Study Branch

SUBJECT: Procedure Memorandum 21 - Mapping of Multi-County  
Communities on Countywide FIRMs

**Background:** Current directives call for multi-county communities to retain their community-based FIRM until all counties in which they lie are converted to the countywide format.

**Issue:** Experience with the processing of multi-county communities indicates that additional processing options are warranted depending on several variables.

**New Procedure:** When processing a countywide FIRM that contains a multi-county community, the subject community-based FIRM will either be retained (and revised if necessary) as indicated in Option 1 below, or superseded using Options 2 or 3 below. It is important to note that seamless mapping coverage between all affected jurisdictions must be obtained and overlapping coverage and/or disclaimed flood hazard information must be avoided if at all possible.

Before a decision is made on the processing method, the following factors must be determined during initial study scoping activities:

- Does the subject community prefer to keep its community-based FIRM?
- In how many counties does the subject community lie?
- How are the multi-county communities shown on the FIRMs for surrounding counties?
- What is the status of the surrounding counties relative to countywide processing?
- Does the subject community have full jurisdiction over its lands?
- How much of the subject community falls within the county that is being processed?
- What is the map scale of the existing community based FIRM?
- How many panels would be added to the countywide FIRM in order to include the subject community in its entirety?

After all information has been obtained, a processing decision will be made in consultation with the MCC Project Officer. It is important to note that all of the Options shown below ensure seamless mapping coverage for all jurisdictions, and prevent overlapping and/or duplicated flood hazard information from being shown on 2 separate FIRMs.

**Option 1:**

Retain the community-based FIRM as a separate map, and show the community as an Area Not Included (with no flood hazard or base map information shown) on the countywide FIRM being processed and on all surrounding counties in which the subject community falls. When this option is chosen, care must be taken to ensure that a concurrent community-based FIRM revision is processed if required to ensure that seamless coverage between the multi-county community and its surrounding counties is achieved. This may necessitate minor revisions to the FIRMs for adjacent counties to ensure that no overlaps or gaps in coverage exist.

**Option 2:**

Map the entire community on the new countywide FIRM. This option should be used when the following criteria are met:

- The multi-county community can be shown on the new countywide FIRM without substantially increasing the panel count.
- The majority (a least 70%) of the community falls on the countywide FIRM being processed.

When Option 2 is chosen, care must be taken to notify the Map Service Center to supersede the community-based FIRM for the multi-county community. The Map Service Center must also be notified to include a notation in the Flood Map Status Information System that the subject multi-county community is shown in its entirety on the new countywide FIRM. It is also important to note that in all likelihood the adjacent counties will continue to show the subject multi-county community as an Area Not Included, even if they are converted to the countywide format at a future date. This decision will be made on a case-by-case basis with the FEMA Project Officer.

**Option 3:**

Split the multi-county community up such that it appears on multiple countywide FIRMs. This option should only be used when the following criteria are met:

- All adjacent counties on which the multi-county community is shown are either already countywide or are planned for conversion to the countywide format in the near future.
- The multi-county community has not expressed significant concerns with being shown on more than one FIRM.

When Option 3 is chosen, if any of the contiguous countywide FIRMs that share the subject community are delayed (due to an appeal, protest, or study complication), thereby making it impossible to have all counties go effective at the same time, it will be necessary to retain the community-based FIRM until such time as the issue is resolved. In this situation, the MCC Project Officer must be consulted for a decision on how to proceed. Decisions will be made on a

case-by-case basis, but must result in continuing, and non-conflicting coverage for all land areas being mapped.

When Option 3 is chosen, it is also important that the Map Service Center be notified to supersede the community-based FIRM for the multi-county community.

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