



FEMA

August 17, 2007

MEMORANDUM FOR: Regional Mitigation Division Directors

A handwritten signature in black ink, appearing to read "Doug Bellomo".

Regions I - X

FROM: Doug Bellomo, Director
Risk Analysis Division

SUBJECT: Procedure Memorandum No. 39 – Requirements for Mapping and Review of Coastal Barrier Resources System Boundaries on Flood Insurance Rate Maps

EFFECTIVE: IMMEDIATELY

Background: The Coastal Barrier Resources Act (CBRA) of 1982, Congress established areas along the Atlantic and Gulf coasts and the Great Lakes, where restrictions for Federal financial assistance, including flood insurance are prohibited. In 1990, Congress passed the Coastal Barrier Improvement Act (CBIA), which increased the extent of areas established by the CBRA and added “Otherwise Protected Areas” to the system. These areas are collectively referred to as the John H. Chafee Coastal Barrier Resources System (CBRS).

The CBRA and CBIA prohibit the sale of federally backed flood insurance by the National Flood Insurance Program for structures built or substantially improved or damaged after the date that the area was added to the CBRS. Because of the flood insurance ramifications in CBRS areas, CBRS boundaries are shown on the Flood Insurance Rate Maps (FIRMs), along with the insurance prohibition dates and other pertinent information.

Note: Unless otherwise indicated “FEMA” refers to FEMA Headquarters or their designee.

Issue: Congress adopted a series of maps entitled “John H. Chafee Coastal Barrier Resources System,” which delineate the extent of each CBRS unit. The U.S. Fish and Wildlife Service (FWS) of the Department of the Interior has the responsibility for oversight, maintenance, and interpretation of these maps. Because the FEMA FIRMs are often the first place that CBRS boundaries are seen, it is important that these areas are accurately transcribed from the official CBRS source maps and that they “fit” the FIRM base map with respect to the Congressional

intent for each boundary. The inaccurate delineation of CBRS boundaries can result in a significant impact on property owners, including the inappropriate denial or provision of Federal flood insurance.

Action: To ensure the integrity of the interpretation and transcription of CBRS boundaries from the official CBRS source maps to the Digital Flood Insurance Rate Maps (DFIRMs), FEMA has entered into an Interagency Agreement with the FWS that enables them (in coordination with their Mapping Partner) to provide a FWS-endorsed CBRS data layer to FEMA during the revision process. This agreement not only transfers ownership of ensuring the CBRS boundaries are digitally captured and fit onto the DFIRM accurately, it also removes FEMA's Mapping Partners responsibility for updating these boundaries during the DFIRM production process. The following is a description of the four-step process flow that shall be associated with this activity.

Step 1. FEMA Headquarters will notify the FEMA Regional offices whenever a FIRM with CBRS boundaries is either in the process of being revised or planned for revision. This will be accomplished by comparing a list of CBRS counties to the inventory of ongoing or planned FIRM revisions.

Step 2. For ongoing revisions to a FEMA FIRM in which a Preliminary DFIRM has NOT been issued or is NOT close to issuance, the FEMA Regional office (or their designee) will ensure a copy of the base map being used for the ongoing studies is provided to the FWS's Mapping Partner for their use in fitting Congressionally-enacted CBRS boundaries. For ongoing revisions to a FEMA FIRM in which a Preliminary DFIRM is very close to issuance, FEMA may direct its Mapping Partner to provide digital data and/or mapping files to allow the FWS's Mapping Partner to incorporate a CBRS data layer into the DFIRM database. In cases such as this, customized deliverable details will be coordinated on a county-by-county basis. Also, because there is a time sensitivity associated with incorporating FWS-endorsed CBRS boundaries into DFIRMs when they are past Preliminary issuance, the following two scenarios should be considered:

Scenario A– The FIRM has already been issued Preliminary but no LFD has been sent: FEMA's Mapping Partner will provide a copy of the Preliminary FIRM and DFIRM Database to the FWS's Mapping Partner for review and revision as warranted, in order to ensure the CBRS boundaries have FWS endorsement.

Scenario B – The FIRM has passed its LFD or is already effective: FEMA's Mapping Partner will provide a copy of the FIRM and DFIRM Database to the FWS's Mapping Partner for a quick assessment and review. Any issues arising from this assessment will be addressed on a case-by-case basis.

Step 3. The FWS's Mapping Partner will incorporate, review and/or adjust the CBRS data and associated graphic elements, to comply with all applicable FEMA standards and will coordinate the FWS review and endorsement of the CBRS boundaries. When this work is complete, the FWS-endorsed CBRS data layer (boundaries and

map notes), associated metadata file(s), and detailed instructions will be provided to FEMA's Mapping Partner for use in the ongoing FIRM revision.

- Step 4.** FEMA's Mapping Partner will provide paper copies of the Preliminary CBRS FIRM panels to the FWS's Mapping Partner for review when issued. Issues or concerns with the CBRS boundaries, annotation, and/or map notes that arise during this review are to be resolved by the FWS or their Mapping Partner.

This process is also graphically displayed on Figure 1 below.

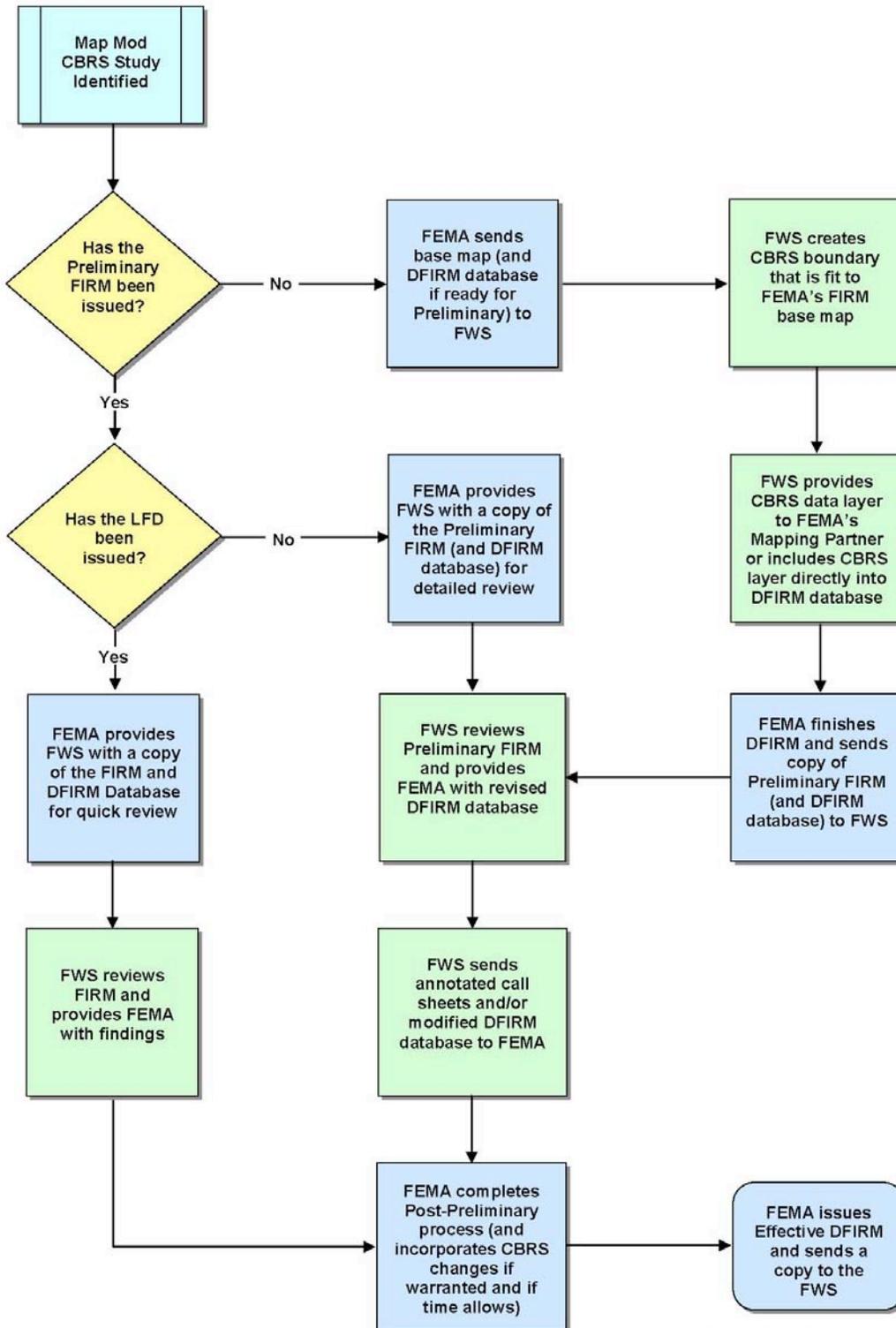


Figure 1 – Flow Diagram

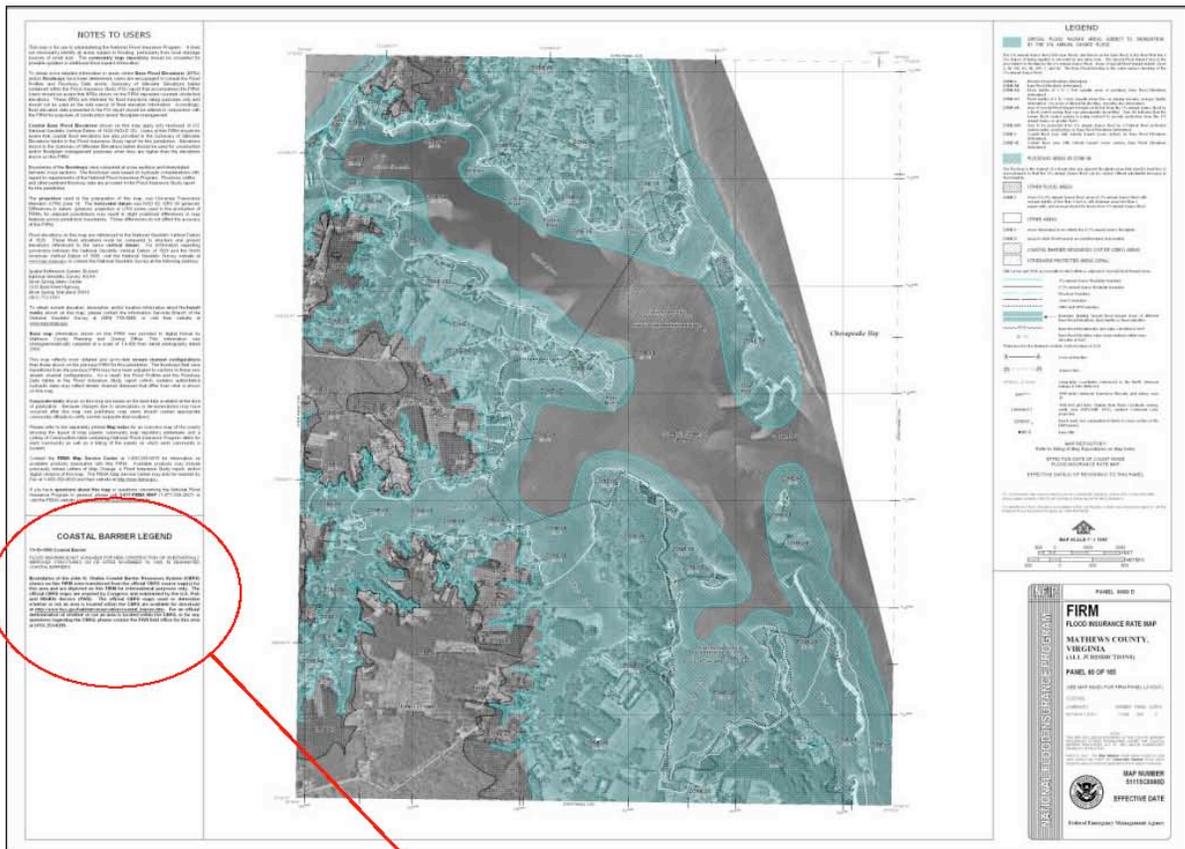
Roles and Responsibilities

The following is a summary of roles and responsibilities of affected entities:

- . • FEMA will act as coordinator for the CBRS boundary transfer activities and will ensure the timely transfer of information between FEMA, the FWS and all Mapping Partners.
- . • The FWS and its Mapping Partner will ensure the accurate transcription of CBRS boundaries to FEMA's FIRMs.
- . • The FWS (or their Mapping Partner) will be responsible for adjudicating any issues or concerns raised during the study process regarding the CBRS boundaries, annotations, and/or map notes.
- . • FEMA will be responsible for ensuring all NFIP mapping products (printed maps, database, FIS, etc.) satisfy the FWS.
- . • FEMA must procure and document FWS concurrence on all final NFIP mapping products containing CBRS boundaries.
- . • FEMA will ensure that the FWS and its Mapping Partner receive copies of Preliminary FIRMs containing CBRS boundaries.
- . • FEMA's Map Service Center will be responsible for issuing copies of revised CBRS FIRMs to the FWS and its Mapping Partner.
- . • FEMA will ensure that in the list of CBRS counties will be added to the MIP, and will establish a plan for aforementioned CBRS FIRM mapping steps to be tracked through the workflow in the MIP.

Additionally, the FIRM map and border notes related to the CBRS that are included in the Guidelines and Specifications for Flood Hazard Mapping Partners (Volume 2 and Appendix K) have been revised with this Procedure Memo. The specific revisions are itemized in the following four figures:

- Figure 2 — CBRS Legend
- Figure 3 — Title Block CBRS Note
- Figure 4 — CBRS Map Body Note
- Figure 5 — Index Note



COASTAL BARRIER RESOURCES SYSTEM (CBRS) LEGEND

(_ _ - _ - _) CBRS Area

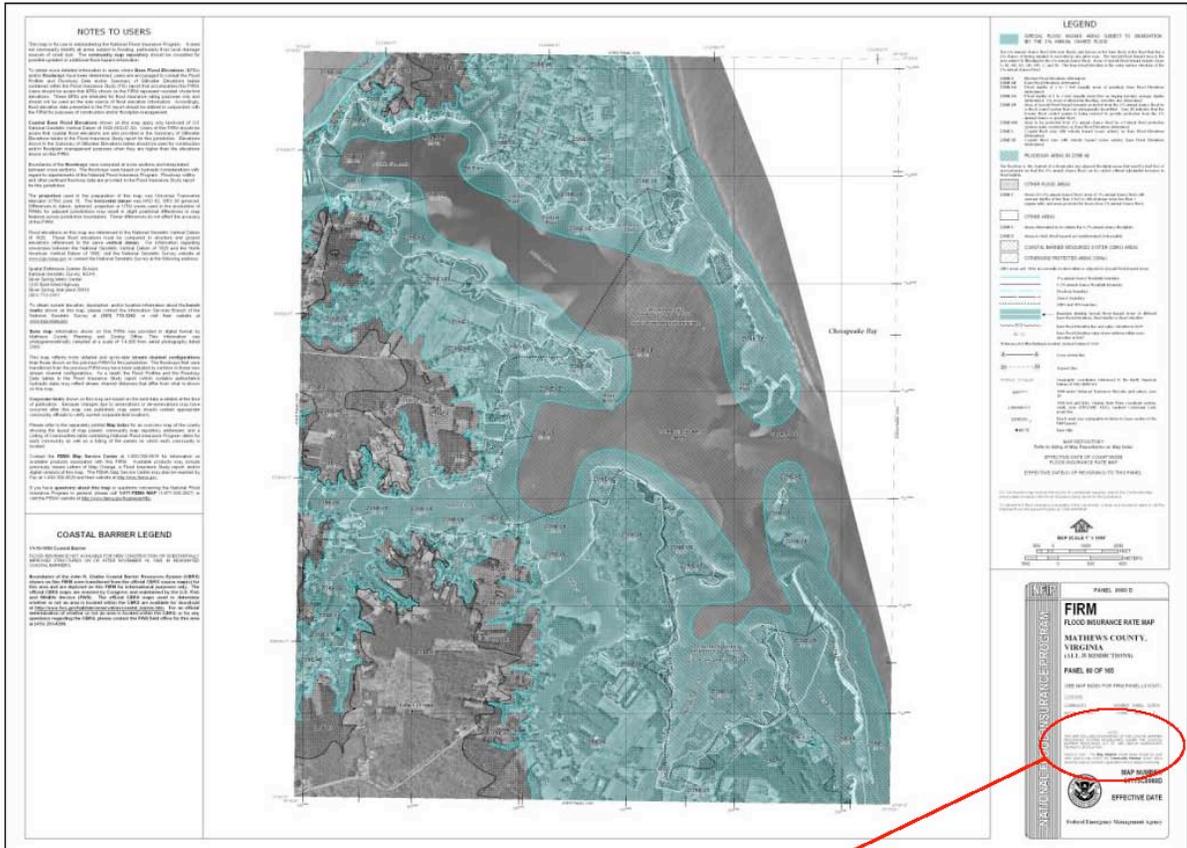
FLOOD INSURANCE NOT AVAILABLE FOR STRUCTURES NEWLY BUILT OR SUBSTANTIALLY IMPROVED ON OR AFTER (*date*) IN DESIGNATED CBRS AREAS.

(_ _ - _ - _) Otherwise Protected Area (OPA)

FLOOD INSURANCE NOT AVAILABLE FOR STRUCTURES NEWLY BUILT OR SUBSTANTIALLY IMPROVED ON OR AFTER (*date*) IN DESIGNATED OPAs WITHIN THE CBRS.

Boundaries of the John H. Chafee Coastal Barrier Resources System (CBRS) shown on this FIRM were transferred from the official CBRS source map(s) for this area and are depicted on this FIRM for informational purposes only. The official CBRS maps are enacted by Congress via the Coastal Barrier Resources Act, as amended, and maintained by the U.S. Fish and Wildlife Service (FWS). The official CBRS maps used to determine whether or not an area is located within the CBRS are available for download at <http://www.fws.gov>. For an official determination of whether or not an area is located within the CBRS, or for any questions regarding the CBRS, please contact the FWS field office for this area at (_ _) _ _ - _ _ - _ _ .

Figure 2 — CBRS Legend
 Page 6 of 9 - Procedure Memorandum No. 39



- NOTE -

THIS MAP INCLUDES BOUNDARIES OF THE COASTAL BARRIER RESOURCES SYSTEM ESTABLISHED UNDER THE COASTAL BARRIER RESOURCES ACT OF 1982 AND/OR SUBSEQUENT ENABLING LEGISLATION.

Figure 3 — Title Block CBRS Note
 Page 7 of 9 - Procedure Memorandum No. 39

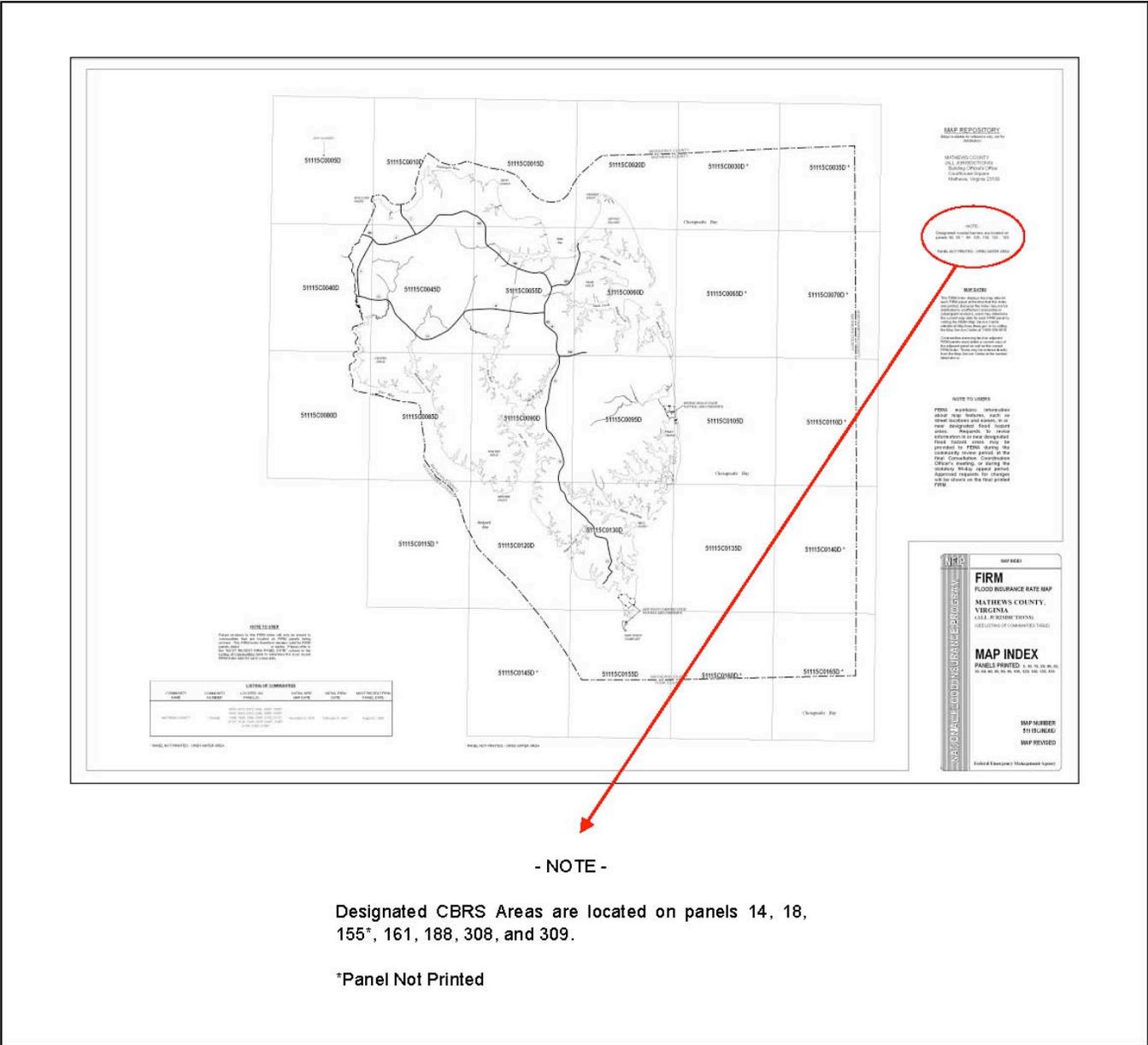


Figure 5 — FIRM Index Note

For additional information, please refer to the *Guidelines and Specifications for Flood Hazard Mapping Partners*, Volume 2: “Map Revisions and Amendments,” Section 2.2, or contact Lora Eskandary at (202) 646-2717.

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