

## 2.0 STAKEHOLDER INPUT

Clear communication between FEMA's Regional Offices, Headquarters, and community, regional, and State partners – as well as many other stakeholders – is critical to the acceptance and success of this MHIP and Flood Map Modernization. Stakeholder comments and concerns played an important role in FEMA's decision to conduct a review of Flood Map Modernization. The resulting Mid-Course Adjustment modifies the goals of the initiative to increase focus on those areas with greatest flood risk.

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Stakeholder input will continue to be of utmost importance to FEMA's planning process, including the ongoing evaluation of the MHIP.

Subsection 2.1, Business Plans and Other Input, explains how the business planning process contributed to the development of the initial MHIP and MHIP updates. Subsection 2.2, Stakeholder Input Process, discusses the input and feedback process, focusing on updates to this plan. Subsection 2.3, Stakeholder Comments on the MHIP, describes the comment process and lists the stakeholders who submitted comments on MHIP Version 1.5.

### 2.1 Business Plans and Other Input

FEMA recognizes the critical role that stakeholder feedback and participation plays in Flood Map Modernization. To help achieve Flood Map Modernization goals, FEMA has asked various stakeholders to draft plans to help identify areas of flood risk and to create a strategy on how to address these issues.

#### 2.1.1 Business Planning Input through FY05

As part of its broader effort to incorporate local, State, and regional involvement in flood mapping, FEMA asked States, commonwealths, territories, and some Cooperating Technical Partners (CTPs) with multi-jurisdictional responsibility for floodplain management to prepare Flood Map Modernization plans in 2002. The plans included extensive mapping needs assessments developed according to FEMA and other criteria.

In early FY04, FEMA made funds available to these same entities to upgrade and update their plans. FEMA received a total of 56 plans covering 49 States and four of the five water management districts within the State of Florida, as well as the District of Columbia, Puerto Rico, and the Virgin Islands. FEMA used these plans as input into the initial sequencing to schedule studies and funding. Appendix C of MHIP Version 1.0 includes summaries of the business plans, which varied in contents and the level of detail, depending on the partner that submitted them. Among other things, many of the FY04 plans described:

- The role each partner plans to play in project management
- The FEMA support required to effectively manage the implementation of the plan
- The integration of other State or Federal programs
- The projects to be completed in each year of the 5-year program

MHIP Version 1.0 describes how FEMA considered the FY04 business plans. It is important to emphasize that FEMA did not require the States and CTPs to limit their identification of mapping needs in their plans to a specific budget, so the plans that included cost estimates do not all fit within the overall funding parameters of the program and FEMA could not simply roll-up the State plans into one composite national plan that exactly reflected every mapping partners' mapping needs, as identified in their business plans.

In early FY05, FEMA again made funds available to these mapping partners to update their plans. A total of 25 States, the Commonwealth of Puerto Rico, and four of Florida's five water management districts submitted either FY05 business plans or amendments to their FY04 plans. Another 25 mapping partners indicated that they had no change to their FY04 plans. Appendix C of MHIP Version 1.5 includes summaries of these business plan updates.

The Ohio Department of Natural Resources (ODNR) submitted a revised summary to be included in appendix C. However, because appendix C was not revised for this MHIP update, the ODNR summary will appear in the next full update. FEMA thanks the ODNR for taking the time to provide this information.

### 2.1.2 Business Planning Updates for FY06

In early FY06, States once again had the opportunity to provide revised business plans. Table 2-1 shows the input collected from the partners.

Table 2-1. FY06 Input from States and CTPs

Region	Entity	FY06 Business Plan Submitted
1	Connecticut Department of Environmental Protection	Yes
1	Maine State Planning Office	Yes
1	Massachusetts Department of Conservation and Recreation	Yes
1	New Hampshire Office of Emergency Management	Yes
1	Rhode Island Emergency Management Agency	Yes
1	Vermont Agency of Natural Resources, Department of Environmental Conservation	Yes
2	New Jersey Department of Environmental Protection	Yes
2	New York State Department of Environmental Conservation, Division of Water	Yes
2	Puerto Rico Planning Board	No

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Region	Entity	FY06 Business Plan Submitted
2	Virgin Islands Department of Planning and Natural Resources	No
3	Delaware Department of Natural Resources and Environmental Control	No
3	District of Columbia Emergency Management Agency	No
3	Maryland Department of the Environment, Wetlands and Waterways Program	No
3	Pennsylvania Department of Community and Economic Development, Governor's Center for Local Government Services	No
3	Virginia Department of Conservation and Recreation, Division of Dam Safety and Floodplain Management	No
3	West Virginia Office of Emergency Services	No
4	Alabama Department of Economic and Community Affairs	Yes
4	Florida/Northwest Florida Water Management District	Yes
4	Florida/South Florida Water Management District	Yes
4	Florida/Southwest Florida Water Management District	No
4	Florida/St. Johns River Water Management District	No
4	Florida/Suwanee River Water Management District	Yes
4	Georgia Department of Natural Resources, Environmental Protection Division, Water Resources Branch	Yes
4	Kentucky Division of Water	Yes
4	Mississippi Emergency Management Agency and Mississippi Department of Environmental Quality	Yes
4	North Carolina Department of Crime Control and Public Safety, Division of Emergency Management	No
4	South Carolina Department of Natural Resources, Flood Mitigation Office	Yes
4	Tennessee Local Planning Assistance Office, Department of Economic and Community Development	Yes
5	Illinois Department of Natural Resources	Yes
5	Indiana Department of Natural Resources, Division of Water	Yes
5	Michigan Department of Environmental Quality	No
5	Minnesota Department of Natural Resources	No
5	Ohio Department of Natural Resources, Division of Water	Yes
5	Wisconsin Department of Natural Resources	Yes
6	Arkansas Soil & Water Conservation Commission	No
6	Louisiana Department of Transportation, Floodplain Management Program	No
6	New Mexico Department of Public Safety/Office of Emergency Management	No
6	Oklahoma Water Resources Board	No
6	Texas Commission on Environmental Quality	No
7	Iowa Department of Natural Resources and Iowa Geological Survey	No
7	Kansas Department of Agriculture, Division of Water Resources	Yes
7	Missouri State Emergency Management Agency	Yes
7	Nebraska Department of Natural Resources	Yes
8	Colorado Water Conservation Board	Yes

Region	Entity	FY06 Business Plan Submitted
8	Montana Department of Natural Resources and Conservation	Yes
8	North Dakota State Water Commission	Yes
8	South Dakota Office of Emergency Management	Yes
8	Utah Department of Public Safety, Division of Homeland Security, Office of Emergency Services	Yes
8	Wyoming Office of Homeland Security and Wyoming GIS Center	Yes
9	Arizona Department of Water Resources	Yes
9	California Department of Water Resources	Yes
9	Hawaii Department of Land and Natural Resources	Yes
9	Nevada Division of Water Resources, Floodplain Management Program	Yes
10	Alaska Department of Commerce, Community and Economic Development, Division of Community Advocacy	Yes
10	Idaho Department of Water Resources	Yes
10	Oregon Department of Land Conservation and Development	Yes
10	Washington Department of Ecology	Yes

## 2.2 Stakeholder Input Process

FEMA recognizes stakeholder input as a crucial factor in the continued success of Flood Map Modernization. Interested parties can order versions of the MHIP on compact disc through the FEMA Map Service Center (<http://msc.fema.gov>) by clicking on “Publications, Documents, and Forms” and selecting the documents they wish to purchase.

### 2.2.1 MHIP Update Process

MHIP updates follow a cyclical process. The process includes publicizing the plan or latest update; gathering stakeholder feedback and input from other sources; reviewing comments and making any appropriate changes; finalizing the parameters (primarily, Flood Map Modernization funding for the new year); and releasing and publicizing the plan. FEMA remains very active during this cycle to obtain maximum stakeholder feedback and input on the plan, so that the MHIP will remain a flexible, “living” planning tool.

FEMA developed the initial MHIP using joint planning materials such as mapping needs, State business plans, and regional business plans, within the overall program budget for Flood Map Modernization. FEMA gathers feedback throughout the year, and produces updates based on State business plans and stakeholder comments. These updates also address annual appropriations, new mandates, and other external factors.

Figure 2-1 shows how FEMA receives stakeholder input at three key points during the planning process: initial input, stakeholder feedback, and annual updates.

- Initial Input:** Initial input is based on business plans from States and CTPs, as well as regional business plans. Additional input comes from mapping needs identified by FEMA’s Mapping Needs Assessment Process and the Mapping Needs Update Support System and/or FEMA’s Mapping Information Platform (<https://hazards.fema.gov>), FEMA’s Biennial Report data submitted by communities (when available), status of ongoing projects, and other input from partners.
- Stakeholder Feedback:** Stakeholders can submit comments to FEMA through [MHIP@floodmaps.net](mailto:MHIP@floodmaps.net), discussions during town hall meetings at national conferences, and individual coordination meetings with stakeholder groups at the local, State, and national levels.
- MHIP Updates:** Stakeholders are given the opportunity to analyze any updates to the initial input (including new State business plans), and submit their comments. FEMA also considers external factors such as congressional input or flood disasters.

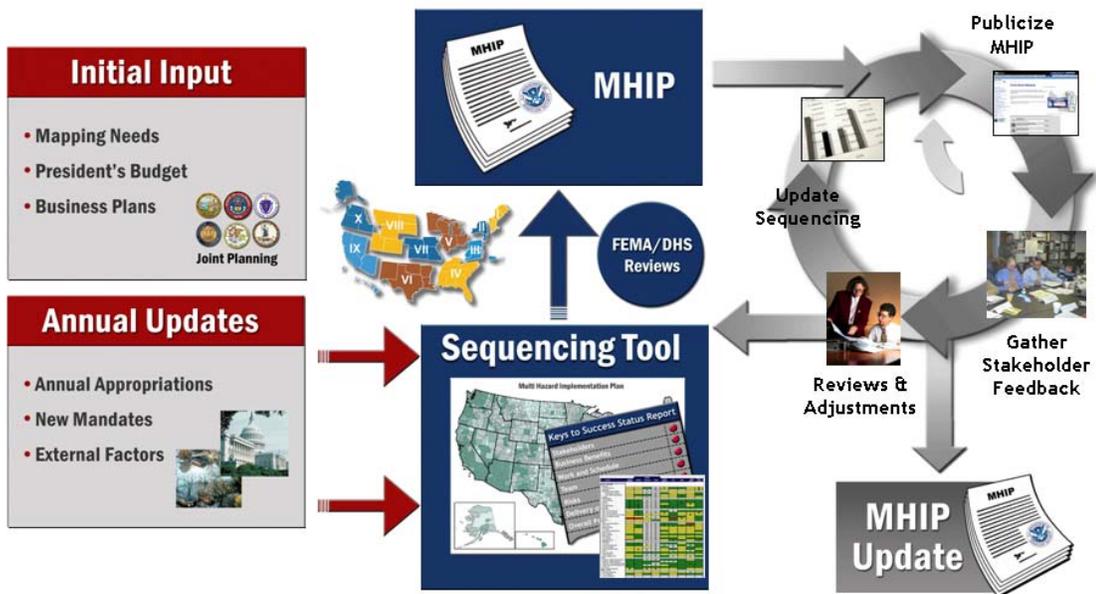


Figure 2-1. Stakeholder Input Process

## 2.3 Stakeholder Comments on the MHIP

The following subsections discuss the general process by which stakeholders can comment on the MHIP.

### 2.3.1 Comment Process

FEMA has continuously accepted feedback through the Regional Offices, the MHIP e-mail address ([MHIP@floodmaps.net](mailto:MHIP@floodmaps.net)), and an MHIP comment form on FEMA’s Flood Hazard Mapping Web

site ([http://www.fema.gov/plan/prevent/fhm/mh\\_main.shtm](http://www.fema.gov/plan/prevent/fhm/mh_main.shtm)). MHIP Version 2.0 addresses comments received during the MHIP Version 1.5 comment period that began on June 30, 2005, and ended on August 30, 2005. FEMA thanks all stakeholders for their continued input and comments in making Flood Map Modernization a successful initiative. FEMA recognizes that these comments aided and played a key role in establishing the Mid-Course Adjustment to map areas of the Nation with the greatest flood risk.

### 2.3.2 Stakeholder Comments

FEMA received 16 comments from 12 sources between the release of MHIP Version 1.5 in June 2005 and the end of the official comment period, August 30, 2005. (Following MHIP Version 1.0, 32 sources submitted a total of 103 comments.) Table 2-2 shows the 12 sources that submitted comments, which included the following:

- State government agencies: 2
- County/local government agencies: 3
- State and national associations: 1
- Engineering and real estate firms and general public: 6

Table 2-2. Commentors on MHIP Version 1.5

<b>State Government Agencies</b>
Ohio Department of Natural Resources, Division of Water
Pennsylvania Department of Community and Economic Development
<b>County/Local Government Agencies</b>
City of Cleburne (TX) Floodplain Administrator
City of Ponca City (OK)
Barron County (WI) Surveyor's Office
<b>State and National Associations</b>
Association of State Floodplain Managers
<b>General Public</b>
(six comments submitted by general public)

Note: Table shows only comments received during official comment period, which ran June 30 - August 30, 2005. FEMA has received additional comments in the interim.

Most comments FEMA received after releasing MHIP Version 1.5 asked about map status for specific locations rather than about the MHIP. As such, those comments are not discussed here. Those comments that focused on Flood Map Modernization were considered in the development of the Mid-Course Adjustment and are thus reflected in this MHIP.

### 2.3.3 Map Quality

Section 7 of MHIP Version 1.0, which FEMA released in November 2004, discusses the levels of studies to be performed and the levels of risk faced by counties. In the months following the release of Version 1.0, stakeholders told FEMA that they were concerned about the quality and veracity of flood data being produced to develop new flood maps.

FEMA staff met with stakeholders, contractors, and other experts to begin developing a new standard by which all flood maps would be measured. These meetings, along with input from Congress, led to a decision to shift the focus of Flood Map Modernization; rather than providing digitized maps for every county in the Nation, FEMA instead will focus on providing flood data for the areas of the country with the greatest flood risk.

FEMA is incorporating a new mapping standard, the Floodplain Boundary Standard, into its *Guidelines and Specifications for Flood Hazard Mapping Partners* ([http://www.fema.gov/plan/prevent/fhm/dl\\_cgs.shtm](http://www.fema.gov/plan/prevent/fhm/dl_cgs.shtm)). FEMA also is developing a “validation” standard regarding the engineering analysis used to develop flood elevations. The new standard is aimed at helping mapping partners determine where new studies must be conducted, where updates to existing flood hazards should be performed, and what might deem a study to still be valid.

### 2.3.4 Program Scope

During the comment period following the release of MHIP Version 1.0, numerous governmental and non-governmental parties expressed concern that FEMA was digitizing existing maps rather than providing new or updated studies and maps.

With 2 years of program experience and based on input from Congress, requests for engineering updates submitted through annual State business plans, adoption of the 2005 Floodplain Boundary Standard, and feedback from stakeholders, FEMA has determined that delaying the goal of having a nationwide digital flood layer, in favor of having more focus on ensuring compliance with the 2005 Floodplain Boundary Standard and providing additional resources for engineering analysis, will better meet the near-term needs of the map users and the Nation. The enhancement of existing standards and the additional gains in product quality that will result from this adjustment also are responsive to Congressional direction that quality not be sacrificed for quantity in revising flood maps.

Accordingly, in FY06, FEMA began prioritizing funding based on mapping 90 percent of the Nation’s flood risk using the Census block group level of detail. This, combined with implementation of the 2005 Floodplain Boundary Standard, will address many of the more immediate needs of the program, even though it will lead to a delay in achieving a national digital flood layer.

