

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 input will continue to be of utmost importance to FEMA’s planning process, including the ongoing evaluation and update of the MHIP.

Subsection 2.1 describes initial stakeholder input into the MHIP. Subsection 2.2, Business Plans and Other Input, explains how the business planning process contributed to the development of the initial MHIP and MHIP updates. Subsection 2.3, Stakeholder Input Process, discusses the input and feedback process, focusing on updates to this plan. Subsection 2.4, Outreach on the FY04-FY08 MHIP, explains the ways in which FEMA notified stakeholders that the MHIP had been released and was available for viewing. Subsection 2.5, Stakeholder Comments on the FY04-FY08 MHIP, describes the comment process, lists the stakeholders who submitted comments on the FY04-FY08 MHIP (Version 1.0), summarizes the issues raised most often, and provides FEMA’s responses to those issues.

2.1 Initial Stakeholder Input Opportunities

FEMA has received input to the planning process during meetings with specific stakeholder groups and from reports and business plans submitted by partners in support of Flood Map Modernization. The stakeholders who have provided input represent a wide range of groups. As the MHIP development and update process continues, FEMA will include additional stakeholders and seek continuous input from mapping stakeholders, with communication about Flood Map Modernization at every level, resulting in better-informed stakeholders and users and better mitigation planning.

As the MHIP development process continues, FEMA will seek continuous input from mapping stakeholders.

To date, FEMA has discussed the 5-year planning process with the following stakeholders:

- Local and State mapping partners, including Cooperating Technical Partners (CTPs)
- Mapping Coalition and member organizations
 - American Congress on Surveying and Mapping
 - American Planning Association
 - American Public Works Association
 - American Society of Civil Engineers
 - Association of State Floodplain Managers
 - Association of State Wetland Managers

- Coastal States Organization
- National Association of Counties
- National Association of Development Organizations
- National Association of Flood and Stormwater Management Agencies
- National Association of Home Builders
- National Association of Realtors
- National Flood Determination Association
- National League of Cities
- National Lenders Insurance Council
- Government Accountability Office
- Other Federal Agencies

2.2 Business Plans and Other Input

2.2.1 Business Planning Input Through FY04

As part of its broader effort to incorporate local, State, and regional involvement in flood mapping, FEMA had asked States, commonwealths, territories, and some CTPs with multi-jurisdictional responsibility for floodplain management to prepare Flood Map Modernization plans in 2002. The plans included extensive mapping need 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 the FY04-FY08 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 describe:

- 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 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 state 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.

2.2.2 FY05 Business Planning Input

In early FY05, FEMA again made funds available to these mapping partners to update their plans. As of April 8, 2005, 25 states, the Commonwealth of Puerto Rico, and four of the five water management districts within the State of Florida had either submitted FY05 business plans or amendments to their 2004 plans. A total of 25 mapping partners indicated that they had no changes to the business plans they submitted in 2004. Table 2-1 shows the input collected from the partners. Appendix C provides summaries of the input received from each state/CTP.

Table 2-1. FY05 Input from States and CTPs

Region	Entity	Input
1	Connecticut Department of Environmental Protection	<i>The agency indicated no change from its 2004 plan.</i>
1	Maine State Planning Office	State of Maine Fiscal Year 2005 Map Modernization Business Plan
1	Massachusetts Department of Conservation and Recreation	<i>The agency indicated no change from its 2004 plan.</i>
1	New Hampshire Office of Emergency Management	<i>The agency indicated no change from its 2004 plan.</i>
1	Rhode Island Emergency Management Agency	<i>The agency indicated no change from its 2004 plan.</i>
1	Vermont Agency of Natural Resources, Department of Environmental Conservation, Water Quality Division	<i>The agency indicated no change from its 2004 plan.</i>
2	New Jersey Department of Environmental Protection	<i>The agency indicated no change from its 2004 plan.</i>
2	New York State Department of Environmental Conservation, Division of Water	<i>The agency indicated no change from its 2004 plan.</i>
2	Puerto Rico Planning Board	Commonwealth of Puerto Rico Map Modernization Business Plan, Amended April 4, 2005
2	Virgin Islands Department of Planning and Natural Resources	<i>The agency indicated no change from its 2004 plan.</i>
3	Delaware Department of Natural Resources and Environmental Control	<i>The agency indicated no change from its 2004 plan.</i>
3	District of Columbia Emergency Management Agency	<i>The agency indicated no change from its 2004 plan.</i>
3	Maryland Department of the Environment, Wetlands and Waterways Program	Maryland Business Plan Revisions for Floodplain Mapping Modernization, March 2005
3	Pennsylvania Department of Community and Economic Development, Governor's Center for Local Government Services	<i>The agency indicated no change from its 2004 plan.</i>

Region	Entity	Input
3	Virginia Department of Conservation and Recreation, Division of Dam Safety and Floodplain Management	<i>The agency indicated no change from its 2004 plan.</i>
3	West Virginia Office of Emergency Services	<i>The agency indicated no change from its 2004 plan.</i>
4	Alabama Office of Water Resources	Flood Map Modernization Program Business Plan, FY 2005 Update (Draft), February 15, 2005
4	Florida/Northwest Florida Water Management District	FEMA Flood Map Modernization Program, 5-Year Business Plan, FY 2004-2009, Draft Revision, February 14, 2005
4	Florida/South Florida Water Management District	Flood Map Modernization Business Plan, Fiscal Years 2005-2009 (Draft), February 14, 2005
4	Florida/Southwest Florida Water Management District	FEMA Map Modernization Program, Southwest Florida Water Management District Business Plan, FY2005-2009 (Draft), February 14, 2005
4	Florida/Suwanee River Water Management District	Suwanee River Water Management District FEMA Flood Map Modernization Program 5-Year Business Plan, FY 2004-2009 (Draft Revision), February 14, 2005
4	Georgia Department of Natural Resources, Environmental Protection Division	State of Georgia Flood Map Modernization Program Business Plan, Revised 2005
4	Kentucky Division of Water	Flood Map Modernization State Business Plan, 2005 Update
4	Mississippi Emergency Management Agency and Mississippi Department of Environmental Quality	Flood Map Modernization Initiative, FY 2004-FY2008 Business Plan, 2005 Update, February 14, 2005
4	North Carolina Department of Crime Control and Public Safety, Division of Emergency Management	Map Modernization Management Support, State of North Carolina Business Plan, FY2005-2009 (Draft Final), February 14, 2005
4	South Carolina Department of Natural Resources, Land, Water, and Conservation Division	2005 Flood Map Modernization Business Plan for South Carolina, February 18, 2005
4	Tennessee Department of Economic and Community Development	2005 Supplement to Tennessee Flood Map Modernization Business Case, February 14, 2005
5	Illinois Department of Natural Resources	Illinois Business Plan for Flood Map Modernization, January 2005
5	Indiana Department of Natural Resources, Division of Water	Indiana Floodplain Mapping Initiative, February 2005
5	Michigan Department of Environmental Quality, Land and Water Management Division	Michigan's Multi-hazard Flood Map Modernization Phase Business Plan, February 2005
5	Minnesota Department of Natural Resources	Minnesota Map Modernization Business Plan 2005 Update
5	Ohio Department of Natural Resources, Division of Water	Map Modernization Business Plan for the State of Ohio, 2005 Update (Draft), February 2005
5	Wisconsin Department of Natural Resources	Fiscal Year 2005 Map Modernization Plan for the State of Wisconsin, December 15, 2004
6	Arkansas Soil & Water Conservation Commission	State of Arkansas Flood Map Modernization Business Plan, 2005 Update (Draft), March 21, 2005

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Region	Entity	Input
6	Louisiana Department of Transportation, Floodplain Management Program	<i>The agency indicated no change from its 2004 plan.</i>
6	New Mexico Department of Public Safety/Office of Emergency Management	<i>The agency indicated no change from its 2004 plan.</i>
6	Oklahoma Water Resources Board	<i>The agency indicated no change from its 2004 plan.</i>
6	Texas Commission on Environmental Quality	<i>The agency indicated no change from its 2004 plan.</i>
7	Iowa Department of Natural Resources and Iowa Geological Survey	<i>The agency indicated no change from its 2004 plan.</i>
7	Kansas Department of Agriculture, Division of Water Resources	Statewide Map Modernization Plan for Kansas, Updated Final Report, March 2005
7	Missouri State Emergency Management Agency	Missouri Multi-Hazard Flood Map Modernization Business Plan, March 2005
7	Nebraska Department of Natural Resources	Flood Map Modernization Business Plan for Nebraska, January 2005
8	Colorado Water Conservation Board	Proposed Map Modernization Studies, February 23, 2005
8	Montana Department of Natural Resources and Conservation, Water Resources Division	<i>The agency indicated no change from its 2004 plan.</i>
8	North Dakota State Water Commission	<i>The agency indicated no change from its 2004 plan.</i>
8	South Dakota Office of Emergency Management	<i>The agency indicated no change from its 2004 plan.</i>
8	Utah Department of Public Safety, Division of Emergency Services	<i>The agency indicated no change from its 2004 plan.</i>
8	Wyoming Office of Homeland Security/ Emergency Management	<i>The agency indicated no change from its 2004 plan.</i>
9	California Department of Water Resources	<i>The agency indicated no change from its 2004 plan.</i>
9	Hawaii Department of Land and Natural Resources	FY2005 Map Modernization Management Support (MMMS) Business Plan (Draft), March 2005
9	Nevada Division of Water Resources, Floodplain Management Program	Nevada Map Modernization Management Support Business Plan, Fiscal Year 2005, February 2005
10	Alaska Department of Commerce, Community and Economic Development, Division of Community Advocacy	FY05 Alaska Business Plan Update, February 24, 2005
10	Idaho Department of Water Resources	Idaho Flood Map Modernization Statement of Work, FY2005 Funding Cycle
10	Oregon Department of Land Conservation and Development	<i>The agency indicated no change from its 2004 plan.</i>
10	Washington Department of Ecology	Map Modernization Business Plan – 2005, December 2004

2.3 Stakeholder Input Process

2.3.1 MHIP Update Process

MHIP updates follow a cyclical process. It includes publicizing the initial plan and updates; 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. Figure 2-1 depicts the general process for gathering and incorporating stakeholder feedback/input and developing and distributing the MHIP and MHIP updates.

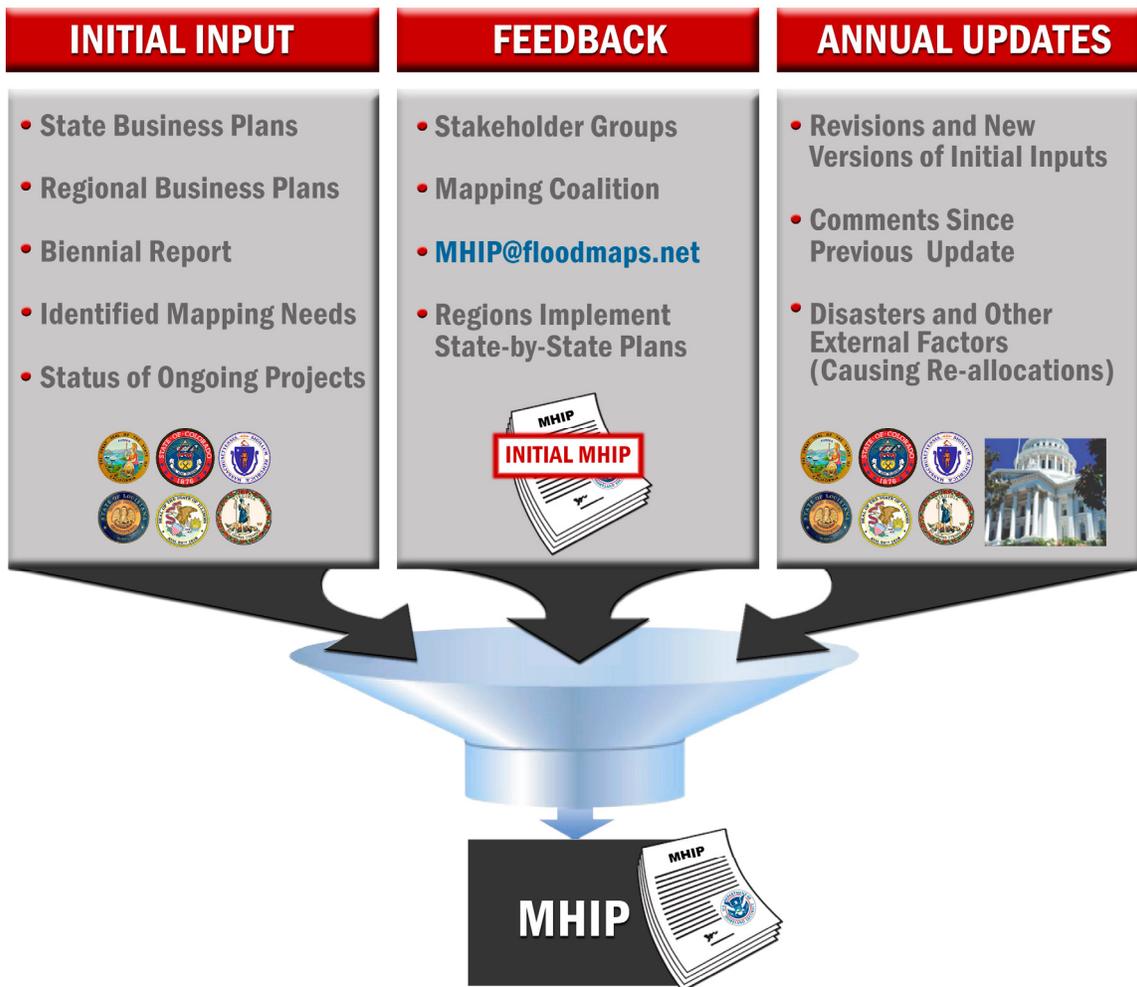


Figure 2-1. General Process for Gathering and Incorporating Stakeholder Input

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 will produce two annual updates based on updated business plans and stakeholder comments. The updates also will address annual appropriations, new mandates, and other external factors.

Figure 2-2 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 (MNUSS), FEMA’s Biennial Report data submitted by communities (when available), status of ongoing projects, and other input from partners.
- **Stakeholder Feedback:** Comments are submitted to FEMA through MHIP@floodmaps.net, discussion during town hall meetings at national conferences, and individual coordination meetings with stakeholder groups at the local, State, and national levels.
- **Two Semi-annual MHIP Updates:** Stakeholders are given the opportunity to analyze any updates to the initial inputs (including new state business plans), and continuously may submit their comments. FEMA also considers external factors such as congressional input or flood disasters.

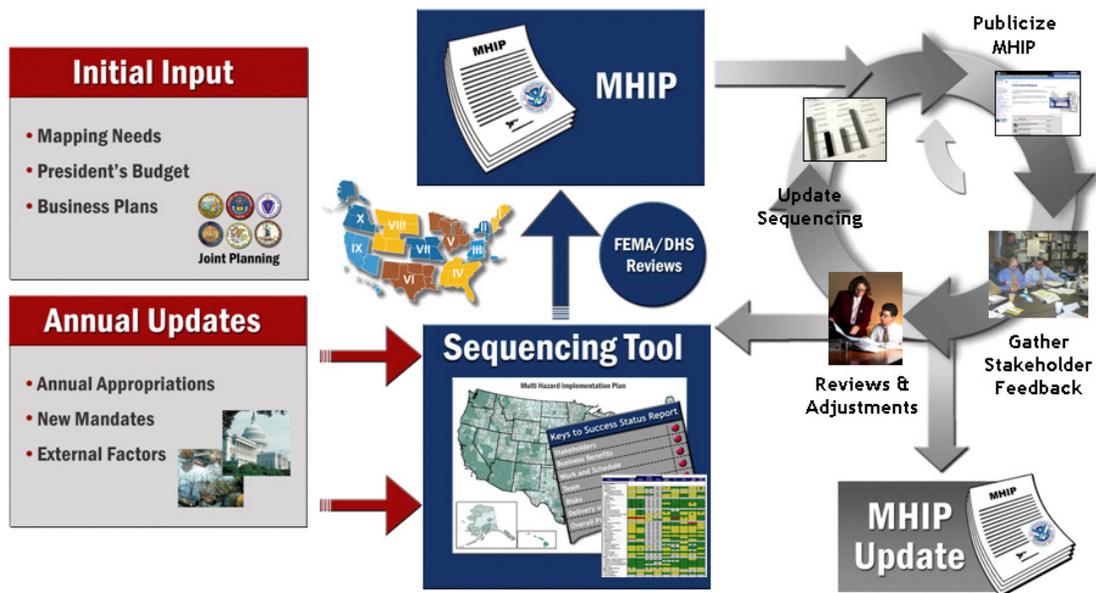


Figure 2-2. Stakeholder Input Process

2.3.2 Publicizing & Seeking Feedback on the MHIP

As part of its plan to continue to publicize the MHIP, FEMA will:

- Present briefings to Congress as required
- Present briefings at meetings with Mapping Coalition members and at the members’ annual conferences
- Distribute informational flyers
- Send messages through the ListServ used to provide general Flood Map Modernization updates
- Post the plan on the FEMA Flood Hazard Mapping Web site
- Provide “news clips” to professional and civic associations for use in their newsletters and other publications
- Include discussions of the plans in mapping-related training sessions and conferences

MHIP updates are released on FEMA’s Flood Hazard Mapping Web site. Interested parties will be able to inquire about how to obtain a copy, in electronic format, through MHIP@floodmaps.net.

2.3.3 Submitting Feedback on the MHIP

After distributing the MHIP, FEMA gathers and consolidates feedback at various points to ensure that stakeholders are submitting comments for consideration, enabling FEMA to maintain the national plan and partners to implement it. For instance, associations are requested to consolidate comments from their members. FEMA Regions consolidate comments from mapping partners within their jurisdiction. Local and State partners are empowered to make decisions in response to comments within their jurisdictions as long as they do not impact the national plan. Any issues that may affect the national plan must be addressed with the appropriate FEMA Region.

Table 2-2 lists some ways in which different entities may provide feedback to FEMA. Regional Offices will coordinate with the FEMA Headquarters. FEMA representatives also will be available to meet during conferences, association meetings, and other events. States are encouraged to talk with their FEMA Regional Office contacts. Regional entities and communities also should confer with their State or FEMA Regional contacts, depending on how roles and responsibilities are defined in their states. Association members should submit comments through their association leadership, who should provide a consolidated set of comments to FEMA.

Table 2-2. Opportunities to Provide Feedback

Entity	Process	Input to
State	State business planning process	FEMA Regional Offices
Local/Regional	Work with state officials, biennial reports; enter data into MNUSS	FEMA Regional Offices
Industry	Attend association meetings, provide feedback to Mapping Coalition members	FEMA Regional and Headquarters

To make the process more convenient, stakeholders can submit comments directly to MHIP@floodmaps.net.

Figure 2-3 shows FEMA’s process for gathering and integrating public comment. Reviewing comments and adjustments to the MHIP is a collaborative process. FEMA’s Headquarters, working in close cooperation with Regions and partners, is responsible for making decisions.

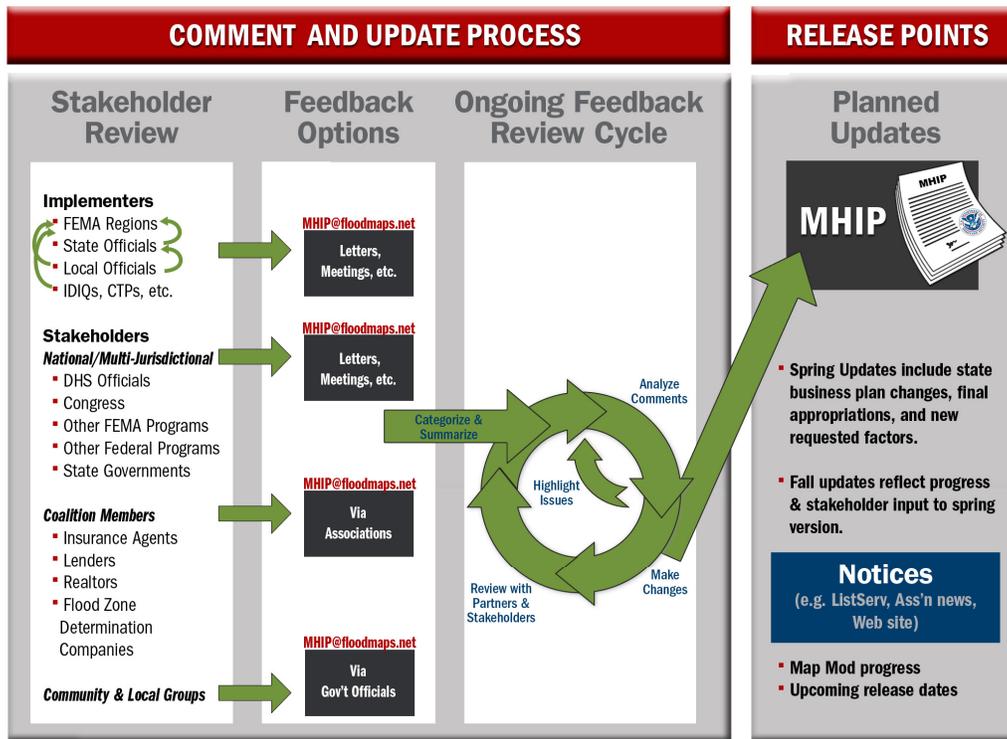


Figure 2-3. Process for Gathering and Integrating Public Comment

FEMA will review all comments and make adjustments based on analysis of the feedback received. FEMA expects many comments from a variety of stakeholders to address common issues, and does not plan to contact stakeholders individually regarding every specific comment. FEMA will provide a summary of comments on this MHIP that have national impacts and how those comments are being addressed in section 2 of the next MHIP update.

Input is critical to joint success. The current version and previous versions of the MHIP always will be available through FEMA’s Web site, and comments can be submitted throughout the year to MHIP@floodmaps.net.

2.4 Outreach on the FY04-FY08 MHIP

When the FY04-FY08 MHIP (Version 1.0) was completed, FEMA released the document on the Flood Hazard Mapping Web site at www.fema.gov/fhm/mh_main.shtm. FEMA notified stakeholders of the release through the following:

- **State mapping partners notifications:** FEMA's Regional Offices provided one hard copy of the MHIP to each State agency responsible for mapping within its Region.
- **Contractor alerts:** FEMA notified current Indefinite Delivery, Indefinite Quantity (IDIQ) contractors by email that the MHIP was available.
- **Other stakeholder notices:** FEMA notified members of the Flood Hazard Mapping and CTP Listservs. FEMA notified stakeholder associations such as the Mapping Coalition through meetings, and sent hard copies to representatives of member associations. FEMA provided notices for stakeholder associations and other groups to reproduce in newsletters, emails, and/or on their Web sites.
- **Public release:** FEMA released the MHIP on the Flood Hazard Mapping Web site and made the MHIP available on compact disc through the Map Service Center.

2.5 Stakeholder Comments on the FY04-FY08 MHIP

2.5.1 Comment Process

FEMA released MHIP Version 1.0 on FEMA's Flood Hazard Mapping Web site on November 25, 2004. FEMA accepted feedback through the Regional Offices, an email address (MHIP@floodmaps.net), and its Web site (http://www.floodmaps.fema.gov/fhm/mh_main.shtm). While only feedback submitted by the deadline date of January 31, 2005 was addressed in this MHIP update because of time limitations, FEMA will continuously accept feedback from stakeholders. FEMA will address the most frequently submitted comments received after January 31, 2005 in future MHIP updates.

2.5.2 Stakeholder Comments

FEMA received a total of 103 comments from 32 sources between the MHIP's release in November 2004 and the end of the official comment period, January 31, 2005. Some comments were delivered to FEMA through U.S. Mail; others were sent by e-mail to MHIP@floodmaps.net. Table 2-3 shows the 32 sources submitting comments, which include the following:

- State government agencies: 9
- County/local government agencies: 11
- State and national associations: 8
- Engineering and real estate firms: 4

Table 2-3. Commentors on the FY04-FY08 MHIP

State Government Agencies
Massachusetts Department of Conservation and Recreation
New York State Department of Environmental Conservation
Ohio Department of Natural Resources
Oklahoma Water Resources Board
South Dakota Office of Public Safety
State of Tennessee
Southwest Florida Water Management District
Washington Department of Ecology
Wisconsin Department of Natural Resources
County/Local Government Agencies
DuPage County (IL)
Lake County (IL)
Marinette Count (WI)
Marshall County (MN)
Meeker County (MN)
Pepin County (WI) Land Management/Emergency Management Department
Price County (WI) Zoning Administration
Rapides Parish (LA) Planning Commission
Texas Colorado River Floodplain Coalition (TX)
Two Rivers-Ottawquechee Regional Commission (VT)
Waco (TX)
State/National Associations
Association of State Floodplain Managers
Illinois Association for Floodplain and Stormwater Management
Missouri Floodplain & Stormwater Managers Association
Minnesota Association of Floodplain Managers
National Association of Flood and Stormwater Management Agencies
National Association of Home Builders
New York State Floodplain and Stormwater Managers Association
Texas Floodplain Management Association
Private Firms
Dewberry, LLC
Harmony Realty
NWR Services
Smith Roberts Baldischwiler, LLC

FEMA categorized the comments received within the stakeholder review period to determine the major issues voiced by stakeholders. The most common topics of comments, based on the number of commentors raising these issues, were:

- Map quality
- Coordination, training, outreach, and stakeholder engagement
- Program scope and funding
- Local issues

2.5.3 Responses to Comments

a. Map Quality

Comment: Some State and local agencies expressed concern that FEMA is digitizing every map, including old maps that may have inaccurate data, instead of focusing on providing new studies and new maps for some counties.

Response: FEMA has committed to providing digital, GIS flood data for every county in the Nation where there is flood risk within a specific period of time. To accomplish this, FEMA plans to provide digital flood maps using anticipated funding through FY08. Once every county with flood risk has a digital map, updates and revisions will be faster, easier, and less expensive.

All of the areas with flood risk will receive an updated, reliable digital flood hazard map. This represents an estimated one-third of our Nation's 3 million stream miles and all coastal areas. The remaining 2 million stream miles are not projected to have significant flood risk potential (e.g., parks and recreation areas, military bases, and other areas with little or no infrastructure at risk.) Maps will be produced in a digital GIS format with updated, accurate base information. These maps will be made available to the public for viewing or for download through a web platform.

Typically, FEMA is working with its local and State partners to target the areas with the highest flood risk for a full engineering analysis. All flood hazard information will be evaluated and adjusted based on available topographic data.

Comment: Local and State agencies and associations voiced concern about the way zones were grouped into the five risk classes (A-E) shown in table 7-1.

Response: FEMA grouped flood hazards into five classes of characteristics that correspond to various levels of risk, or risk classes, shown in table 7-1, to achieve a more meaningful correlation between risk and reliability.

FEMA currently is addressing comments received on section 7 of the FY04-FY08 MHIP (Version 1.0), November 2004, while incorporating the standards from this section into the *Guidelines and Specifications for Flood Hazard Mapping Partners*. FEMA will further develop these standards as part of the process of updating the *Guidelines and Specifications*. Additional information and updates on the *Guidelines and Specifications* are available on FEMA's Flood Hazard Mapping Web site at http://www.fema.gov/fhm/gs_main.shtm.

Comment: Some communities asked for clarification of the relationship between the anticipated funding (shown in appendix A) and the risk values (shown in appendix D).

Response: FEMA used a two-step process for determining the mapping sequencing, in order for the Regions and their stakeholders to have meaningful input. First, to determine the distribution of funds to the Regions, FEMA calculated risk values based primarily on quantifiable criteria that focused on high-risk, high-population, and high-growth areas, as described in section 3. FEMA defined a risk value for every county in the country using a formula based on these criteria. FEMA discussed potential criteria for study schedule and budget decisions with local, State, and Federal stakeholders at a meeting in Atlanta during January 2003. The factors FEMA used to distribute funds to the Regions (starting with FY03 studies) include area, population, population growth, housing units, flood policies, flood claims, repetitive flood loss properties and claims, and declared flood disasters. FEMA used these factors to determine risk value, and the resulting funding to the Regions. Appendix D of the FY04-FY08 MHIP (Version 1.0) presents the FY03 risk values, rough costs, and adjusted risk values for each county.

Next, FEMA's Regional Offices used the state business plans, their knowledge of their Regions, information in other databases, information related to need and leverage, and more specific factors in the context of available funding to develop a regional plan, which included the sequencing for their Regions. The number of projects funded at the regional level depended on the ranking of risk values and the budgets for individual flood map update projects. The results of the regional sequencing determinations are shown in appendix A of the MHIP.

These risk values are not equivalent to the funds budgeted per county in appendix A of the MHIP, because the costs associated with sequencing within the Regions were based on different factors and computed differently than funds were distributed to the Regions. Also, these funds represent only the Federal share.

b. Coordination, Training, Outreach, and Stakeholder Engagement

Comment: Local and State agencies and associations thanked FEMA for the opportunity to provide input and urged FEMA to continue to allow stakeholder input to influence the plan.

Response: FEMA is committed to continuing an open planning process through the preparation of the MHIP twice a year. This coordination will continue throughout the flood map update process and updates to the MHIP. After each MHIP update, stakeholders will be given an opportunity to reflect on the document and make suggestions for the following update.

Comment: A few State agencies expressed concern that they did not have enough time to review and comment on the MHIP prior to its publication.

Response: The MHIP is updated twice each year. Comments received after the established comment period for each MHIP will be addressed in the subsequent version.

FEMA recognized that the local and State agencies and State and national associations would most likely contact their State's Flood Map Modernization business planning representative first with questions or concerns about the MHIP. Some stakeholders did provide input to FEMA on the MHIP process prior to release of the FY04-FY08 MHIP (Version 1.0). This early stakeholder feedback resulted in changed sequencing for many states, and a revised discussion of the state business plans, among other revisions.

The continued input of community, State, regional, association, and other stakeholders is critical to the long-term success of the MHIP. Recognizing the importance of stakeholder and public input, FEMA has built into the overall MHIP schedule a comment period following publication of every MHIP update. During this period, stakeholders are welcome to share their opinions and concerns about the Plan, and FEMA will continue to review stakeholder input on the MHIP and as appropriate, incorporate feedback into the next MHIP update.

c. Program Scope and Funding

Comment: Some organizations stated that the funding levels projected in the MHIP are not great enough to meet all of the mapping needs for every county in the country.

Some stakeholders suggested that FEMA extend the timeframe for completing mapping updates beyond FY08.

Response: FEMA realizes that some flood mapping needs identified may not be addressed within FEMA's current funding levels. However, FEMA will continue to work with States and communities to define the most efficient and effective approach for providing and maintaining flood hazard information for the Nation.

Comment: Stakeholders submitted various suggestions relating to the weighting of factors – such as population, past and/or anticipated growth, and housing starts – or inclusion of additional factors used to determine risk value.

Response: FEMA is currently reviewing the funding distribution process for FY06 and later, as explained in section 3, Distribution of Funds to the Regions.

d. Local Issues

Comment: Many local and State agencies requested that specific counties move ahead in the sequencing, requested additional funds for specific communities, or stated that their communities had data or ongoing studies to contribute to the mapping update.

Response: Comments specific to sequencing were referred to FEMA's Regional Offices to consider in the spring 2005 sequencing update. Sequencing is performed at the FEMA Regional level. FEMA representatives in each Region combine their knowledge of the regional study needs, study costs, and availability of data with input from state and other local mapping partners to devise a tentative sequencing plan, including estimated study costs. The Regions' contribution to the four

national Key Performance Indicators (KPIs) is also a factor for sequencing decisions. Because leveraged effort is one factor FEMA considers, communities contributing to the modernization of their Flood Insurance Rate Map may move forward in the sequencing to an earlier year if they can justify the mapping need and show a greater level of flood risk. Therefore, an ongoing study or additional data or resources may be counted as leveraged resources, which may result in the county moving forward in the sequencing order.

Other comments specific to a community, county, or State were also referred to FEMA's Regional Offices for their consideration or for the Regional Offices to address directly with the commentor, as needed.

Comment: Some State agencies and associations expressed concern that the funds FEMA has allotted for updating flood maps in a specific jurisdiction, as shown in appendix A of the MHIP, are lower than the funds cited as necessary in their States' Flood Map Modernization business plans.

Response: FEMA asked the States to submit annual business plans that include both proposed sequencing of counties over the duration of the initiative and a proposed budget for modernizing the States' flood maps. FEMA incorporated States' business plans to the greatest extent possible in the sequencing of studies; however, FEMA's national plan is not a composite of the state plans. Many States submitted business plans in which the requested resources exceeded the funding available not only for that State's portion of the Region's budget, but in some cases, for the entire Region. The most common reason for this disparity was the number and level of detail of studies that many states sought in addition to modernizing the flood maps.

Matching the funding requested by some States was not an option. FEMA attempted to honor those requests and, at the same time, address the needs of the other States within the Region. Although there were some disparities between the business plans and the overall regional budgets, the sequencing shows strong correlation in the scheduling of the studies.

Each FEMA Region used the input from the state business plans to develop a regional plan and submitted that to Headquarters, which apportioned the available funds for that fiscal year among the Regions. Each Region then divided the existing funds among the counties in its States, but in some cases could not provide 100 percent of the funds requested by the States.

FEMA intends to continue to allocate resources for flood mapping based primarily on flood risk. As a result, not all areas with lower risk will be studied with the same degree of detail as areas with higher risk, as explained in section 7 of the FY04-FY08 MHIP (Version 1.0), November 2004.

FEMA did request that States identify how state and local resources could be provided to address gaps in Federal funding for their desired Flood Map Modernization efforts. FEMA expects approximately 20 percent of the funding for mapping updates to be contributed by resources leveraged by CTPs and other local/State agencies that are participating in the mapping process. Some States did not identify cost-sharing, leveraging opportunities, or expansion of CTP program

participation. Therefore, the cost estimates for flood map update projects requested in the state business plans do not reflect all of the opportunities to leverage funding from other sources.