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To: michael.f.howard@dhs.gov

Cc: Kenneth.Hinterlong@dhs.gov; MaryJo.Mullen@dhs.gov; Terry.Fell@dhs.gov; memberhelp@floods.org; Lyell Thomas

Subject: MHIP comments

Dear Mr. Howard:

Thank you for the opportunity to comment on the Multi-Year Flood Hazard Identification Plan (MHIP). As the first state-wide Cooperating Technical Partner (CTP) in FEMA Region V, we strongly support the floodplain mapping goals outlined in the MHIP. However, we are concerned that these goals will not be achieved with the current plan.

We were directed by FEMA in 2002 to develop a Map Modernization Plan for Michigan that identified the mapping needs in all of our counties. We carefully reviewed flood mapping needs with the goal of updating floodplain mapping state-wide to provide communities with new maps that are in a digital format and GIS compatible. We also want to provide quality maps that are as accurate as possible. We estimated that it would cost approximately \$30 million.

We realize that funding is limited and Michigan's proposed allocations in the MHIP will be about half of what we need. Consequently, the mapping money should be prioritized to obtain the best maps possible. But we believe the metrics for Map Mod are forcing us and the public to accept substandard mapping in order to meet the program goals. It seems the overriding goal now is to map everybody as quickly as possible. This goal is fine as long as the program produces quality maps. But with inadequate funding, it is not possible to produce quality maps and be comprehensive at the same time.

The current MHIP proposal will provide funding to do little more than digitize existing maps and augment that with better quality approximate studies. The funding for detailed studies will only address a small fraction of those that are needed. This is insufficient and will result in poor quality maps that fail to provide the data needed to adequately manage floodplain development. Errors on existing maps and out-of-date studies will continue to appear on the new maps, but will seem better because they have a newer date. This will lead to public distrust in the maps and general opposition to the entire mapping program.

In 2002, FEMA indicated that the initial years of the program needed to produce many new maps as quickly as possible, which translates into mostly redelineations and approximate studies. They also indicated that detailed studies would follow in the later years of the program. However, our most populated and high-growth counties, those most in need of detailed studies and updates, are in the early years of the program and the MHIP does not address revisiting those counties in later years.

We feel strongly that the only way to produce quality DFIRMs is to extend Map Modernization funding beyond the five year period and to prioritize the current funding to produce detailed studies where they are needed. We would advocate for more funding to realistically address the needs in our state business plan. If funding remains inadequate, we should use that amount to produce high quality DFIRMs in areas with the greatest need, not to produce watered-down maps that meet the program metrics.

In summary, we urge FEMA to:

- 1) Argue for additional years at the end of the current five-year period
- 2) Stress to Congress that the five-year plan is ambitious but will not produce quality maps for everyone
- 3) Adjust the program metrics to accommodate mapping priorities as determined by the states in their business plans

Please feel free to contact me if you have any questions or comments.

Thanks,

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