Mapping Coordination

Pre-Meeting Topic Discussion

June 4, 2009

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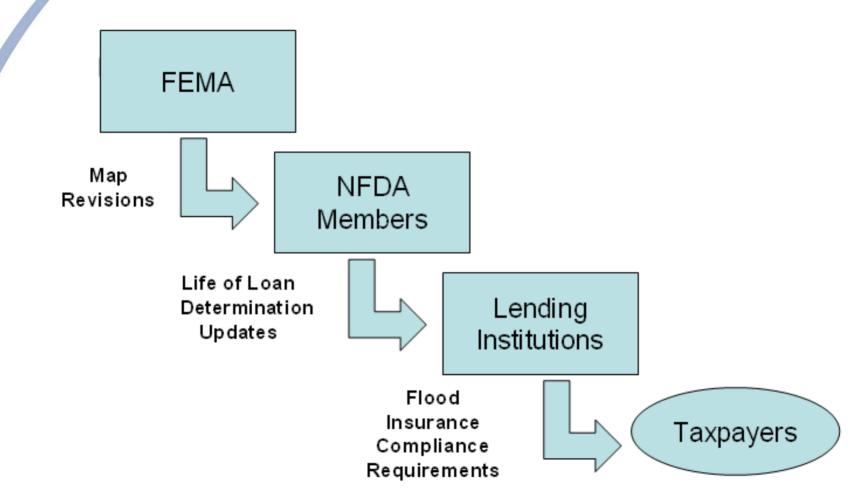
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The NFDA strongly encourages FEMA to address the following areas prior to their transition to all-digital flood map delivery:

- Improve digital data distribution, subscription and notification through the Digital Post Office (DPO)
- Reduce content and technical differences between data types
- Provide guidance related to map interpretation and digital data policy
- Consider potential issues with the National Flood Hazard Layer

Impact of Map Use by NFDA Companies



Digital Data: Distribution, Subscription & Notification

Different release dates for paper FIRMs, FIRM Scans and DFIRM data

NFDA proposes that all data types be released simultaneously

- Centrally published release schedule not available When should we expect each data type?
- Notification is not being provided for data that will be released post-effective date

Would like to be notified if the data will be "late" or if it will not be available at all

*<u>Example:</u> Oxford County, ME, Effective Date 07/07/2009 <u>Digital Data not yet received</u>

Digital Data: Distribution, Subscription & Notification

• Improvements to the Digital Post Office

Current Inconsistencies within the DPO:

- Data listed in the catalog but not available for subscription download
- Notification not provided when data becomes available
- Notification provided but data not available

Digital Data: Distribution, Subscription & Notification

Establish service level standard

In order to effectively incorporate DFIRM or FIRM Scans into proprietary systems to process a revision and meet compliance guidelines mandated for federally regulated lenders, <u>Flood Zone</u> <u>Determination companies must receive the digital data at least 30</u> **days prior** to the effective date of the new map.

Impact = *Lender Compliance; Public Outcry*

Digital Data: Distribution, Subscription & Notification

DFIRM & FIRM Scans are frequently received less than 30 days prior to the effective date or even after the effective date.

Examples:

- Merced County, CA; Effective Date 12/02/2008
 - FIRM Scan received 01/02/2009; DFIRM received 12/11/2008
 - Population Estimate: 244,218*
- Dane County, WI; Effective Date 01/02/2009
 - FIRM Scan received 02/12/2009; DFIRM received 01/22/2009
 - Population Estimate: 482,705*
- Cumberland County, PA; Effective Date 03/16/2009
 - FIRM Scan received 03/24/2009; DFIRM 03/10/2009
 - Population Estimate: 229,361*
- Santa Clara County, CA; Effective Date 05/18/2009
 - FIRM Scan received 5/12/2009; DFIRM received 05/03/2009
 - Population Estimate: 1,764,499*

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*U.S. Census Bureau July 1, 2008 population estimate

Digital Data: Distribution, Subscription & Notification

The North Carolina Issue

- Between October 1, 2008 May 31, 2009:
 - 18 counties revised
 - 1,674 panels revised
 Estimated Population for revised counties: 2,099,409*
- To date, <u>no</u> DFIRM or FIRM Scan has been made available for the State of NC. <u>Only</u> paper FIRMs have been made available.
- 7 NC Counties with revision effective dates after October 1, 2009
- NFDA needs a commitment that DFIRM and FIRM Scans will be available for distribution no later than 30 days prior to NC revision effective dates.

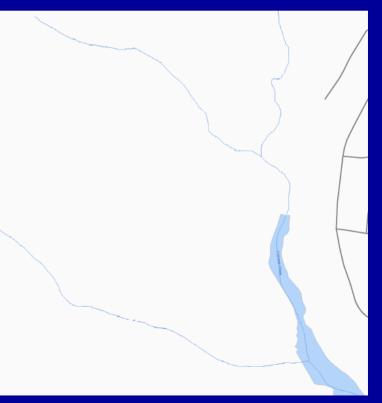
*U.S. Census Bureau July 1, 2008 population estimate

Content & Technical Differences

Features present in one data type but missing in the other

Travis County, TX Panel 48453C0230H, Effective Date 9/26/2008





DFIRM

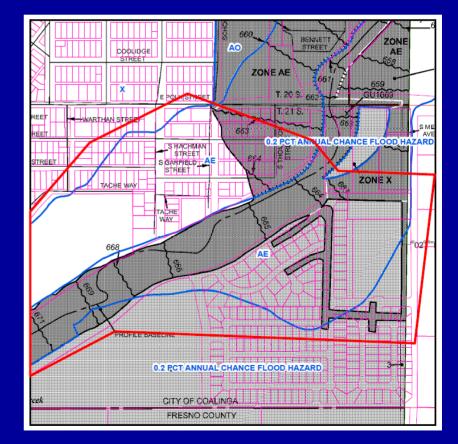
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Content & Technical Differences

Features present in one data type but missing in the other

Fresno County, CA Panels 06019C3213H &3214H, Effective Date 2/18/2009

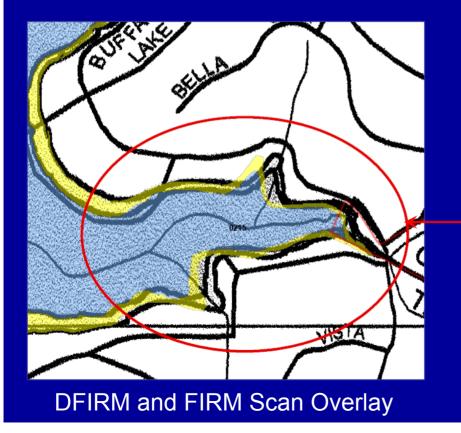
- LOMR Case No. 07-09-1375P effective 2/25/2008 included on FIRM Scan, but not on DFIRM.
- Significant number of residential properties affected.



Content & Technical Differences

Features present in one data type but missing in the other

Travis County, TX Panel 48453C0215H, Effective Date 2/26/2008



0.2% ANNUAL CHANCE FLOODING

SFHA (FLOOD ZONE AE)

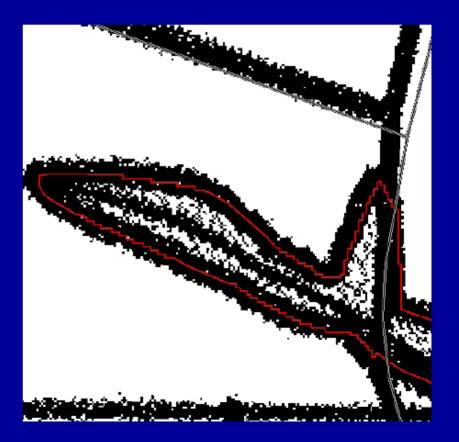
Area of spatial discrepancies between DFIRM and FIRM Scan

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Content & Technical Differences Inconsistencies Between Flood Map Products

Travis County, TX Panel 48453C0245H, Effective Date 2/26/2008

- Inconsistent generalization or smoothing
- Line thickness differences between data types



Guidance Related to Map Interpretation & Digital Data Policy

Discrepancies are often the result of Map Users interpreting the data differently

- Differing zone/risk conclusions can be reached when the data attributes are not consistent.
- Differing conclusions can be reached based upon interpretation of the edge of the Special Flood Hazard Area.
- Paper FIRMs and DFIRMs are both considered "legal standard" but data can be different. One media should be deemed as the legal standard.
- If paper FIRMs are only provided to communities, other map users may come to differing conclusions when the data are different.

Homeowners, Lenders, WYO companies, Insurance Agents & Flood Determination Providers are impacted.

The National Flood Hazard Layer: Issues and Considerations

NFHL not current with respect to Map Revisions & LOMCs

Physical Map Revision Examples

- Solano County, CA- Effective Date 05/04/2009; data delivered 04/09/2009; NFHL shows as DFIRM but no DFIRM layers available
- Bay County, FL- Effective Date 06/02/2009; data delivered 06/02/2009; NFHL shows as DFIRM but no DFIRM layers available

LOMC Examples

- Orange County, CA- DFIRM does not reflect LOMR Case No. 08-09-1428P Effective Date 03/30/2009. Instead, superseded LOMR Case No. 04-09-0964 is shown
- Cook County, IL- DFIRM does not reflect LOMR Case No. 09-05-2788P Effective Date 04/14/2009
- \rightarrow Questionable accuracy of determinations provided
- \rightarrow Possible source of discrepancies