

Technical Mapping Advisory Council (TMAC)

In-person/Virtual Hybrid Public Meeting Notes

June 13, 2023, 8AM - 5PM ET

TMAC Members

Stacey Archfield, *USGS, Department of the Interior Designee*

Doug Bellomo, *AECOM, Chair*

Vince DiCamillo, *Stantec Consulting, Mapping Member, Vice Chair*

Scott Giberson, *Flood Compliance Principal, CoreLogic Flood Services*

Ataul Hannan, *Harris County Flood Control District, Local CTP Representative*

Maria Cox Lamm, *South Carolina Department of Natural Resources, NFIP Coordination Offices*

William Lehman, *USACE, USACE Representative*

Jon Paoli, *Iowa Homeland Security & Emergency Management, GIS Representative*

Jamie Reinke, *Nebraska Department of Natural Resources, State CTP Representative*

Luis Rodriguez, *FEMA, FEMA Designee*

Brooke Seymour, *Mile High Flood District, Regional Flood and Storm Water Member*

Jonathan Smith, *Resource Inventory Division of Natural Resources Conservation Service, U.S. Dept. of Agriculture*

Jeff Sparrow, *Moffatt & Nichol, Floodplain Management Member*

Liang Xu, *Santa Clara Valley Water District, Local CTP Representative*

Subject Matter Experts

Salomon Miranda, *California Department of Water Resources*

Government Attendees

Sarah Abdelrahim, *FEMA, ADFO*

John Ebersole, *FEMA, Legal Counsel, ADFO*

Brian Koper, *FEMA, DFO*

David Rosa, *FEMA, ADFO*

Support Staff

Henry Cauley, *Team Deloitte*

Sonia Clemens, *AECOM*

Kathryn Friedman, *Michael Baker*

Naemah Islam, *Team Deloitte*

Necolle Maccherone, *Atkins Global*

Grace Morris, *Atkins Global*

Sloan Oliver, *Team Deloitte*

Jonah Vasquez, *Michael Baker*

Other Attendees

David Conrad, *ASFPM*

Mark Condodemetraky, *G.C. Engineering*

Kim Dunn, *T&M Associates*

Jerry Dudley, *South Carolina Association for Hazard Mitigation*

Kori Eskelin, *Xactus Flood Solutions*

Beryl Gomez, *Independent Management*

Zane Hadzick, *FEMA NFIP*

Mike Hanson, *ServiceLink*

John Ingargiola, *FEMA*

Shilpa Mulik, *FEMA, Floodplain Management Division*

David Oakes, *Illinois Association for Floodplain and Stormwater Management*

Mitch Paine, *FEMA NFIP*

Virgil Smith, *CoreLogic Flood Services*

Matt Vogt, *Global Solution Architecture*

Purpose

The purpose of this meeting is to come to a decision on whether TMAC will recommend FEMA consider changes to the definition of the SFHA/or to procedures when land is filled or graded within the SFHA. If so, the TMAC will develop recommendations in the 2023 Annual Report around these topics. The objectives of this meeting were accomplished by using a modified design sprint meeting style.

Welcome, Roll Call, Administrative Items, and Opening Remarks

Mr. Brian Koper introduced himself and welcomed everyone to the in-person and virtual public meetings. After the roll call, Mr. Koper explained the requirements and protocols associated with this public meeting compared to previous administrative meetings; he emphasized the procedures for public comments. He then handed it over to Mr. Bellomo to review the agenda for the next two days. After no further comment or questions, the meeting transitioned to the next agenda item.

Review of Read-Ahead Materials

Mr. Vince DiCamillo reviewed the read-ahead materials. The materials focused on what the ideal state for the SFHA would look like and how the SFHA is supported by those who responded to the RFI. The mandatory purchase requirement was one of the main issues that will be discussed throughout the day. Mr. Koper asked the TMAC to keep the lens of equity towards disadvantaged communities and the impact that changes to the SFHA would have on the underprivileged. Mr. Ron Jacobson noted that many of the challenges identified in a 20-year-old Gilbert White paper have not changed today. Mr. Scott Giberson asked the TMAC to keep timing and impacts in mind, specifically, if the TMAC recommends a change, will there be a time component in the recommendations. Additional comments suggested looking at the core of the issue and analyzing where the disconnection is when it comes to SFHA. With no further comment or questions, the meeting transitioned to the next agenda item.

Presentation on RFI Analysis

Ms. Necolle Maccherone and Ms. Grace Morris introduced an analysis of an RFI that had questions of relevance to the SFHA. Ms. Morris said that the largest portion of respondents said that FEMA should update flood elevation requirements by setting freeboard levels. Most respondents said that a one-foot minimum was the highest suggested freeboard height. Climate change, floorplan functions, erosion, and mudflow were the most recommended metric when deciding on SFHA.

Overall, about 85% of responses indicated that the SFHA was insufficient. Nature-based solutions and government coordination were both the highest recommendations from the general SFHA sentiment.

The TMAC noted that geography would have been an interesting category to capture from an equity standpoint.

Ms. Jaime Reinke stated that freeboard misses some things, and it is only a requirement when one is developing in the floodplain.

Ms. Maccherone and Ms. Morris concluded this discussion by reiterating the limitations of the conclusions pulled from the analysis. Mr. Bellomo stated that the high-level results of the analysis seem to align with anecdotal experience.

There was continued discussion on SHFA, FFRMS, and Fill.

Sprint Process Overview

Mr. Bellomo discussed the Design Sprint Review and the Sprint Process for today. Ms. Mary Jo Mullen, contract support, virtually walked through an example via a video recording of a design sprint around morning coffee for her and her husband. The design sprint overview outlined pathways for the TMAC to approach the 2023 Tasking Memo from FEMA in a collaborative and streamlined way.

Lunch

The TMAC adjourned for a 1-hour lunch.

SFHA Sprint: Who are the Customers?

Mr. Bellomo discussed the 2015 Report User Guide to define the customers and the legal mandate for mandatory purchases and floodplain management. The TMAC began discussions by identifying who the targeted audience and customers of the SFHA were. Ms. Reinke stated the importance of local ownership of the product. The group preliminarily identified that the customers are SLTTs (State, Local, Tribal, and Territorial), lending enterprises, taxpayers as the ultimate customer, and land use, and building code officials.

SFHA Sprint: Ask the Experts

Two local floodplain mapping experts, Mr. Jerry Dudley from Florence, South Carolina, and Ms. Kristen Owen from Henrico County came to speak. Along with Mr. John Ingargiola lead physical scientist at FEMA was invited to the call to give their expertise on floodplains. Mr. Scott Giberson the Flood Compliance Principal with CoreLogic Flood Services, Mr. Mark Condodemetraky from G.C. Engineering, and Mr. Mike Hanson from ServiceLink all spoke about their expertise related to the SFHA.

Mr. Dudley said that floodplain rules are not always black and white and there are some things that are a little open to interpretation, but it is good to have federal regulations to fall back on that groups adopt locally and base local ordinances on that or they do not have to bend too much. One thing his community struggles with is that they do not have a ton of floodplains and it is not mapped completely. Mr. Dudley noted the ground realities with the current SFHA guidelines in practice. Mr. Sparrow asked Mr. Dudley if it would be helpful to have pluvial incorporated into the SFHA. Mr. Dudley replied that it may be helpful and be tied to local issues that would be helped by the change.

Ms. Owen discussed how her county adopted a revised definition of SFHA to adapt to local issues. Changes to the definition of SFHA included maintenance of the carrying capacity and a no-fill requirement and allowed compensatory storage to meet the no rise as a view of development. Ms.

Owen stated that the current SFHA definition does not meet the needs of her community. Ms. Owen's county's next step in improving floodplain resilience is to update floodplain maps and include future conditions and, possibly, pluvial flooding in the maps.

Mr. Ingargiola discussed how damage from a 1% chance of floods over the next 50 years could increase from 30-60%. He provided an updated flood design. He suggested remaining engaged in advancing flood resilient standards and leveling with the design community.

Mr. Giberson reviewed the 2004 Gilbert White Forum and shared the lender perspective. He insisted that the map determinator's role is to review and consume the published FIRMs and then provide a report to the lender to follow mandatory purchase. He suggested for the purposes of the product that the TMAC is proving to the lenders, the SFHA is sufficient. However, if it changes to modify the processes to the new definitions.

Mr. Condodemetraky and Mr. Hanson noted that the challenge to overcome with updating or changing the SFHA definition is with mandatory purchase requirements. They both stated that if the definition changes, they would modify their processes to report the new definition and not leave it subject to interpretation. Mr. Condodemetraky said that the SFHA definition should be amorphous and that the mandatory purchase and SFHA definition can exist completely independently of each other. Mr. Ataul Hanan discussed how customers want more reliability with what they are looking at especially with units of measurement fall short.

Other members of the TMAC engaged in conversation with the experts, which concluded this section of the agenda.

Break

The TMAC adjourned for a short 5-minute break.

SFHA Sprint: Draw the Map

Mr. Bellomo led the discussion about drawing the map, which highlights the process customers take to get to desired outcomes. The customers identified are SLTTs and lending enterprises. The ideal outcomes discussed were better management of risk, better communication of flood risk, easier to comply with minimum standards, clarity, and easier to implement higher standards. The TMAC discussed how the SFHA was originally designed as a communication device. Challenges at multiple stages throughout the process are identified during the exercise as well.

Vote

Mr. Rodriguez motioned for the TMAC to vote on whether a change is necessary for the SFHA. The motion was seconded by Mr. Lehman. Mr. Bellomo asked the TMAC to respond with a yes or virtually raise their hand if a change was necessary. 10 in the room and 4 in the virtual room voted yes. Mr. Bellomo then asked the TMAC to respond with a no or virtually raise their hand if a change was not necessary. There were none in the room and in the virtual room. Mr. Bellomo stated the TMAC decided that a change for the SFHA is necessary.

Public Comment Period

Mr. Koper began the public comment period at 3:30 pm ET. As of the meeting date, there

were no public comments formally submitted. Mr. Koper opened the forum for those that would like to make a public comment, and he explained the procedure to make a public comment.

David R. Conrad, Association of State Floodplain Managers verbally provided a comment. A written version of this comment is provided at the end of this document.

Michael Wichkoski verbally provided a comment. A written version of this comment is provided at the end of this document.

After no further comment, Mr. Koper adjourned the public comment period.

SFHA Sprint: Define Success

Mr. Bellomo led the conversation on the overarching vision of defining success. The TMAC agreed that success involved shared responsibility, avoiding future risks, and acceptance of standards and data. The following vision statement for a redefined SFHA was generated by the TMAC, an SFHA definition that allows participating jurisdictions and lenders to meet their needs while increasing acceptance of flood risk products and avoiding future risks.

There were continued conversations on factors that impact redefining the SFHA, such as pluvial, freeboard, climate change, existing struggles with compliance to minimum standards, data quality, and decision-makers in local settings.

SFHA Sprint: Wrap-Up

Mr. Bellomo requested that the TMAC members and select support staff finish a sprint exercise before tomorrow. Mr. DiCamillo went over the agenda and what to expect in tomorrow's meeting, as he will lead the meeting on June 14th.

Close Out and Adjourn

Mr. Bellomo thanked the members of the TMAC, other attendees, and support staff for their contributions during the meeting. The meeting adjourned for the day at 4:31 pm ET.

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June 14, 2023, 8AM - 5PM ET

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Floodplain and Stormwater Management

Mitch Paine, *FEMA NFIP*

Virgil Smith, *CoreLogic Flood Services*

Matt Vogt, *Global Solution Architecture*

Purpose

The purpose of this meeting is to continue the decision of the decision on whether TMAC will recommend FEMA consider changes to the definition of the SFHA/or to procedures when land is filled or graded within the SFHA. If so, the TMAC will develop recommendations in the 2023 Annual Report around these topics. The objectives of this meeting were accomplished by using a modified design sprint meeting style.

Welcome, Roll Call, Administrative Items, and Opening Remarks

Mr. Brian Koper introduced himself and welcomed everyone to the in-person and virtual public meetings. After the roll call, Mr. Vince DiCamillo explained the requirements and protocols associated with this public meeting compared to previous administrative meetings. Then reviewed the agenda for today; he emphasized the procedures for public comments. He then handed it over to Mr. Bellomo to review the agenda for the day.

TMAC discussed breaking down the LOMR-F Request and recommended that FEMA might consider changing procedures for modifying the SFHA through letters of map change and map updates when land is filled or graded to be at or above estimated 1% annual chance exceedance flood levels (or BFEs).

After no further comment or questions, the meeting transitioned to the next agenda item.

Fill Sprint: Who are the Customers? What are the Outcomes?

TMAC discussed that the LOMR-F submitted for properties on which fill has been placed to raise a structure or lot to or above the BFE. Following discussion with regulations the TMAC decided that the LOMR-F is the product and decided that the definition of the SFHA needs to change to address the problem based on mandatory purchase requirements.

Ms. Shilpa Mulik discussed how customers are elevated but are not getting discounts as they are not elevated enough. However, the issue of the foundation type is presented as it is not the most resilient foundation, therefore customers wouldn't get the discount.

Fill Sprint: Ask the Experts

Ms. Kristen Owens, floodplain mapping expert from Henrico County, discussed how LOMA, LOMR, and LOMR-F are limited for customers and therefore are not able to be used due to regulations and as it is not consistent with what FEMA wants the customers to do. Ms. Owens' organization prohibits fill to see about what obstruction is doing with floodplains from a flood risk perspective.

Ms. Maria Cox Lamm from the South Carolina Department of Natural Resource and NFIP Coordination Officers, discussed how both floodplain management and customers have no way to prevent fill in their ordinances.

Break

TMAC adjourned a 10-minute break.

Fill Sprint: Draw the Map

During the mapping exercise, TMAC reached the conclusion that the customers are developers and the NFIP community.

The developer customer's ideal outcomes would be for the ability to build within compliance, mandatory purchase removed, and meeting the requirements of "reasonably safe from flooding." The steps needed for the ideal outcome are to have engineering support, engage with the community for permits, apply CLOMR-F, place fill, survey, and apply LOMR-F. Some challenges that may present are training, lack of data like BFE with engineering support, external pressures, ESA with CLOMR-F application, and the perception of reasonable safety may be wrong.

For the NFIP community ideal outcomes would be to have a resilient foundation type, increased resilience to flood risk, economic development, and compliance with NFIP, ESA, ordinances etc. The steps to gain those outcomes would have master planning, reviewing permits, CLOMC application, place fill, surveys, and applying LOMC. While having the challenge of having staffing limiting capacity, not built for designs, community resources, resources, record keeping, and circumventing other policies and regulations.

Lunch

The TMAC team for a 1-hour lunch break

Public Comment

Mr. Koper began the public comment period at 12:00 pm ET. Mr. Koper opened the forum for those that would like to make a public comment, and he explained the procedure to make a public comment.

Mr. Chad Berginnis from ASFPM verbally provided a comment. A written version of these comments is provided at the end of this document.

Mr. Koper adjourned the public comment period after no further comments.

Vote

Mr. DiCamillo motioned for the TMAC to vote on whether a change is warranted for the LOMR-F procedures. The motion was seconded by Mr. Sparrow. Mr. DiCamillo asked the TMAC to respond with a yes or virtually raise their hand if a change was necessary. 11 in the room and 3 in the virtual room voted yes. Mr. DiCamillo then asked the TMAC to respond with a no or virtually raise their hand if a change was not necessary. There were none in the room and in the virtual room. Mr. DiCamillo stated the TMAC believed that change is warranted for the LOMR-F procedures.

The TMAC proceeded with a discussion about where the current process faults and when change needs to be made and redefining SFHA as they are dependent on each other.

Fill Sprint: Define Success

The TMAC defined long-term goals within the next three years as part of the mapping exercise.

The TMAC looked at recommendations on how FEMA should consider changing procedures for

modifying the SFHA through letters of map change and map updates when land is filled or graded to be at or above the estimated 1% annual chance exceedance flood levels. TMAC members discussed updating maps, creating recommendations based on science, and making the process simpler for homeowners and developers.

Mr. DiCamillo recommended that future changes to the SFHA based on the placement of fill be reduced from the current state with all impacts identified and mitigated to the maximum extent possible. As this impacts the environment and existing property owners.

Mr. Sparrow recommended that fill placed in SFHA will have no adverse impact on structures built in areas impacted by any coastal wave action and are built safely/resiliently. This may mean redefining Coastal A Zone.

Ms. Jamie Reinke recommended that communities understand the impacts of fill/grading placed within their floodplains, developers/realtors are notifying property owners of that potential risk, there are clear guidelines on what is expected of communities, and existing loopholes are closed.

Mr. Lehman recommended that communities, developers, and homeowners collaborate to manage flood risk of flooding as a shared responsibility.

Ms. Archfield recognized that protection of life and property from floods is a shared responsibility and flood risk is ubiquitous, policies for fill and grading must use the best available science and engineering practices to ensure stewardship of our land and each other.

Mr. Hannan said that success in the process when land is filled or graded would be with defined shared responsibilities and minimizing future risk and a better environment for all.

The vision of long-term success was defined as to have no adverse impacts, improve shared responsibility, minimize future risk, and reduce encroachments in the floodplain (fill in the SFHA). The TMAC developed a long statement goal which is to fill in SFHA/floodplain limits impacts to flood risks and our environment.

Break

The TMAC adjourned for a 10-minute break.

Fill Sprint: Wrap-Up

Ms. Necolle Maccherone presented the design sprint review with LOMR-F on what steps would be next after the meeting is concluded. She presented that she will be collecting and receiving feedback on the process of the meeting from the TMAC.

The TMAC discussed the timeline and details on conducting surveys and focus groups regarding the LOMR-F and working with SMEs and floodplain managers.

Mr. Bellomo asked if there were any further comments and then moved to the next part of the agenda.

Wrap Up and Follow Up

Mr. Bellomo thanked the members of the TMAC, other attendees, and support staff for their contributions during the meeting. The meeting adjourned for the day at 3:10 pm ET.

Public Comments

Comments of David R. Conrad, Association of State Floodplain Managers, to the Technical Mapping Advisory Council, June 13, 2023

I want to thank the Technical Mapping Advisory Council for allowing the public to provide comments during these important meetings. I am David Conrad, Sr. Water Resources Policy Advisor on the staff of the Association of State Floodplain Managers, and I have served in that capacity for approximately the past five years or so on the ASFPM national policy team.

I also appreciate the important work of the TMAC in helping guide FEMA in developing its flood risk mapping and risk assessments, and to better translate the communication of this evolving field of information for the use of the public at all levels, especially to reduce the mounting flood risks in virtually all parts of the nation. My primary comment today is to express our strong wish and hope that the TMAC will work in 2023 to develop recommendations for FEMA's risk mapping and communications efforts to better support, efficiently and authoritatively integrate with, and truly accelerate all federal agencies' implementation of the Federal Flood Risk Management Standard (or FFRMS). As TMAC knows, the FFRMS is currently being rolled out to reduce the nation's flood risks and losses -- both now and on into the future -- that are associated with expenditures that support and underwrite the public's federal investments. It seems to me it would be a mistake -- from here forward -- not to make every effort to bring NFIP flood risk characterization together with FFRMS. Several Federal agencies are currently developing guidance and regulations to begin to implement these higher standards to protect federal investments, along with other levels of government, especially taking into account climate change trends, sea-level rise and other factors for the longevity and resilience of infrastructure and communities.

From the origin of the FFRMS, it was recognized that communities and federal agencies need the best flood risk information available to set and implement standards with appropriate margins of safety (and in light of estimated future conditions) for federal investments in all critical facilities, community infrastructure, and housing, including especially housing of lower income and economically disadvantaged families. This program has the potential to help identify and craft the higher-than-minimum standards that are needed to help reduce the mounting risks and costs of flooding that are being experienced in all regions, and eventually to help NFIP evolve to get a greater handle on the risks and costs it is now experiencing. HUD, for instance, has recently proposed draft rules to guide their housing programs investments to reduce flood risk and support wise floodplain management.

Initially, when it was first conceived, the FFRMS gained support from the many states and local communities that had already chosen to adopt higher flood standards -- especially building elevation standards -- demonstrating that many communities' experiences strongly supported their recovery and resilience goals.

It also seems to me that studying and making recommendations on coordinating NFIP and FFRMS falls especially in the category of Biggert-Waters fifth goal -- of developing "methods for improving interagency and intergovernmental coordination on flood mapping and flood risk determinations and developing a funding strategy to leverage and coordinate budgets and expenditures across Federal agencies."

I would also like to add that from what we are hearing, NOAA is making substantial progress toward updating their Atlas 14 and 15 volumes, especially as a result of the Bipartisan Infrastructure Act (Infrastructure Investment and Jobs Act of 2021), and expects to at least bring the nation's extreme precipitation Atlas up-to-date, and begin to include elements of future expected precipitation extremes at a wide variety of time periods in the next few years. As a result, NFIP flood risk maps will benefit with more accurate data inputs, and the siting of a large set of new investments in the nation's infrastructure will also benefit with helping identify what it takes to avoid and reduce risk with better flooding estimates.

Again, thank you for the opportunity to provide these comments.

It's great to hear that the Federal Emergency Management Agency (FEMA) Technical Mapping Advisory Council (TMAC) will be holding an in-person public meeting with a virtual option on June 13-14, 2023. This meeting provides an excellent opportunity for members of the public to learn more about FEMA's efforts to improve flood mapping and risk communication. The virtual option is especially appreciated as it allows individuals who are not able to attend in person to participate and contribute their perspectives. By engaging with stakeholders and the public in this way, TMAC is demonstrating its commitment to incorporating a range of viewpoints into its work, which will ultimately lead to more effective flood mapping and risk management strategies. I look forward to following the outcomes of this meeting and seeing the positive impact that TMAC's work will have on communities across the country.

Comments of Michael Wichkoski, to the Technical Mapping Advisory Council, June 13, 2023

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Comments of Chad Berginnis, ASFPM, to the Technical Mapping Advisory Council, June 14, 2023

The 2022 FEMA resilience grouping has been in the midst of evaluation and looks like a reorganization. It appears that the second phase of that reorganization has been completed where the traditional directorates of risk management, mitigation, and federal insurance are remaining largely as is, whereas FIMA is dissolved and moved up to a front office of resilience with a strategy office and those types of things. However, in a recent report provided by FEMA at the end of May, in which they consulted some stakeholder organizations. However, in a recent report provided by FEMA at the end of May, in which they consulted some stakeholder organizations. Further, we've recently become aware that that probably a focus on some of the deep dives that are mentioned in that report includes at least risk management, if not the Mitigation Directorate. Further, we've recently become aware that that probably a focus on some of the deep dives that are mentioned in that report includes at least risk management, if not the Mitigation Directorate. It is also one of the larger statutory authorities within there and ASFPM has previously commented directly to FEMA about being careful to reorganize into some kind of functional organization or to ensure that we do not raid or otherwise take resources from flood mapping and from the National Flood Insurance program to fund other resilience priorities that are much more diffuse in nature and multi hazard and not having that focus on flooding. I wanted to make sure that the TMAC is not only aware of these ongoing efforts, but also. To the extent that you can, ensuring that the priority of flood mapping, which is in the national interest, it is the hazard that that day in, day out year in, year out results in the most damages and we still have a lot to go that those resources do not get rated nor that staffing or other uh other staff assets, umm, get deluded through some kind of functional reorganization or other approach.