

Technical Mapping Advisory Council (TMAC)

In-person/Virtual Hybrid Public Meeting Notes

October 24, 2022, 8AM - 5PM ET

TMAC Members

Steven Aichele, *USGS Representative*
Stacey Archfield, *USGS, Department of the Interior Designee*
Doug Bellomo, *AECOM, Chair*
Vince DiCamillo, *Stantec Consulting, Mapping Member, Vice Chair*
Scott Giberson, *CoreLogic Flood Services, Flood Hazard Determination Member*
Ronald Jacobson, *Coleman Engineering, Surveying Member*
Carey Johnson, *Kentucky Division of Water, State CTP Representative*
Maria Cox Lamm, *South Carolina Department of Natural Resources, State NFIP Coordination Offices*

William Lehman, *USACE, USACE Representative*
Jon Paoli, *Iowa Homeland Security & Emergency Management, GIS Representative*
Luis Rodriguez, *FEMA, FEMA Designee*
Jonathan Smith, *Natural Resources Conservation Service, USDA Designee*
Jeff Sparrow, *Moffatt & Nichol, Floodplain Management Member*
Liang Xu, *Santa Clara Valley Water District, Local CTP Representative*

Government Attendees

John Ebersole, *FEMA, Legal Counsel, ADFO*

Brian Koper, *FEMA, DFO*
David Rosa, *FEMA, ADFO*

Support Staff

Henry Cauley, *Team Deloitte*
Sonia Clemens, *AECOM*
Necolle Maccherone, *Atkins Global*
Jennifer Marcy, *Atkins Global*

Sloan Oliver, *Team Deloitte*
Molly Tuttle, *AECOM*
Jonah Vasquez, *Michael Baker*

Other Attendees

David Conrad, *ASFPM*

Rick Sacbibit, *FEMA*

David Bascom, *FEMA*

Laura Algeo, *FEMA*

Linna Xu, *Urban Institute*

Purpose

The purpose of this meeting was for the TMAC members to discuss and vote on the content of the 2022 TMAC Annual Report Outline. Any related materials will be available upon request prior to the meeting to provide the public with an opportunity to review the materials.

Subcommittee Working Sessions

From 8:00 am ET to 11:00 am ET, the TMAC members attended subcommittee working sessions. These sessions were not available for public viewing.

Lunch

The TMAC adjourned for a 1-hour lunch.

Welcome, Roll Call, Administrative Items, and Opening Remarks

Mr. Brian Koper introduced himself and welcomed everyone to the in-person and virtual public meeting. After the roll call, Mr. Koper explained the protocols associated with this public meeting compared to previous administrative meetings. He then handed it over to Mr. Doug Bellomo to review the agenda. After a comprehensive review of the agenda, the meeting transitioned to the next agenda item.

Definition Discussion

Mr. Vince DiCamillo began an overview of the definitions included in the draft annual report. The included definitions are based on the Tasking Memo from FEMA to TMAC, as well as the need that became apparent through writing.

Mr. Luis Rodriguez inquired about the source of these definitions, and Mr. DiCamillo confirmed that Justice 40 interim guidance was used as a reference for many of the definitions.

Mr. Bellomo stated that the terms socially vulnerable and disadvantaged communities need to be kept separate and distinct from one another. The TMAC agreed.

Mr. Bellomo posed the question: is there a difference between a disadvantaged community and a disadvantaged local jurisdiction? There was a lively discussion on capability, capacity, and what makes a community. A conversation on constricting communities to geographic boundaries through language was had between multiple TMAC members. The conversation concluded by stating that the historical context of these terms makes them challenging to define, but they are necessary.

Many members of the TMAC then stated how being socially vulnerable does not equal being disadvantaged, particularly in the context of a disaster event.

Ms. Maria Cox Lamm recalled that during a Subject Matter Expert (SME) briefing, the SME stated that income level is not always a great identifier for a disadvantaged community. Ms. Cox Lamm then stated that they are open to other perspectives. People can be highly vulnerable to flood risk, but it is not always indicative of income.

Mr. Rodriguez inquired about using the term Socially Vulnerable when it is not part of the Justice 40 interim guidance. Mr. DiCamillo responded by stating that in much of the literature, the term socially vulnerable is often used. Mr. DiCamillo reiterated that Disadvantaged Communities are the focus of the Annual Report but that including both terms can shed light on differences between the terms.

Mr. Bellomo thanked everyone for the lively discussion and encouraged continued conversations on this topic.

Subject Matter Expert (SME) and Stakeholder Engagement Discussion

Mr. Scott Giberson began by acknowledging the team. Mr. Giberson gave a brief overview of all previous SME presentations. He then reviewed the objectives and timeline for this subcommittee. The objective was stated as “Manage TMAC’s SME and stakeholder engagement efforts to support TMAC’s work by (1) organizing presentations and other types of engagement forums with SMEs and stakeholders identified by the other Teams, by other experts, by the public, or through our own efforts, (2) bringing on standing SMEs, and (3) supporting the creation of the annual report including the use of content from the SME and stakeholder engagement.” Mr. Giberson then presented takeaways from conversations with other subcommittees and requested additional thoughts from the subcommittees. Ms. Cox Lamm asked for a tribal representative to speak with the group.

Mr. Giberson then gave an overview of priorities and the next steps for this committee.

Mr. William Lehman discussed a survey that this subcommittee is creating. Questions will focus on floodplain managers and others familiar with Risk MAP perspectives on barriers to disadvantaged populations to identify perceptions in the field. The survey is meant to illuminate any evidence of bias in this population that can be used to formulate recommendations in the Annual Report. The survey may also bring awareness to the unintended consequences of identifying or not identifying flood hazards and risks. The subcommittee would like feedback on the questions before they are sent out.

Ms. Cox Lamm mentioned that she has access to a listserv for NFIP-participating communities in South Carolina and that other states have similar listservs.

Mr. Bellomo suggests adding a field in the survey to include how the participant would identify themselves and if they are responding from the perspective of a disadvantaged community or not.

After hearing no further comment, Mr. Bellomo adjourned the TMAC for a brief break.

Break

The TMAC adjourned for a short break.

Chapter 2 Discussion

Ms. Cox Lamm began an overview of Chapter 2 content. The subcommittee began by adding content around what was already known and supplemented it with information from the SMEs.

The barriers will be stratified into individual barriers and community barriers. The subcommittee has identified questions that they are requesting input from the larger group about.

The first question was about disclosure. Ms. Cox Lamm posed the question, is there an opportunity under FFRD for input or additional evaluation of disclosure? There was a conversation between many TMAC members on current types of disclosure. Ms. Cox Lamm asked the TMAC if disclosure should be kept as a barrier. After a discussion on barriers to information, unintended consequences, and whether disclosures reduce barriers, it was agreed that this is an important topic to explore. Ms. Linna Xu, a SME, mentioned the importance of disclosure with renters because they are future home buyers, and disclosure can be tied to better outcomes. Mr. Bellomo mentioned that the TMAC should consider more promotion and inclusion of more information with respect to disclosure. Mr. Rodriguez stated that the implementation of this recommendation needs to be considered in the context of Risk MAP when drafting it.

The second question posed to the group by Ms. Cox Lamm was about the accessibility of digital flood risk information. The subcommittee is leaning towards recommending additional assistance to disadvantaged communities rather than reducing the level of information. They are also considering investments to create products related to data dissemination. Mr. Ron Jacobson mentioned the lack of internet access for populations. Ms. Cox Lamm mentioned that there will be different recommendations for different populations. For example, there are populations with internet access who lack software licensing to access the data online.

Ms. Cox Lamm stated that comments on any section of this chapter will be reviewed by the subcommittee and posed a third question, is there a correlation between disadvantaged communities and not being mapped? Are they a barrier in and of themselves, or are they part of a larger barrier? This is something the subcommittee is exploring.

Ms. Cox Lamm then presented a list of barriers to taking action, gave an overview of those barriers, and requested feedback from the TMAC.

Moving forward in Chapter 2, the next question was posed, are defining benefits as only things we can quantify the only benefits of Risk MAP? Mr. Bellomo stated that there are quantifiable, anecdotal, and other benefits that can be considered, and a way to quantify them may be explored.

With the time-sensitive public comment period in mind, the TMAC shifted to that agenda item to finish the Chapter 2 discussion later in the day.

Public Comment Period

Mr. Koper began the public comment period and gave an overview of the associated rules and regulations. Mr. Koper requested that members of the public interested in speaking indicate so.

Mr. Koper read the first comment that was submitted in writing from NAFSMA. A written version of this comment is provided at the end of this document.

Mr. Koper read the second comment that was submitted in writing from NC DOT. A written version of this comment is provided at the end of this document.

Mr. Koper then opened the public comment period to others that did not submit comments ahead of time. After hearing none, Mr. Koper concluded the public comment period at 3:39 p.m. ET.

Discussion of Public Comments

Mr. Bellomo stated that it was beneficial to hear these comments and that they will be reviewed further by each subcommittee after this meeting.

Continuation of Chapter 2 Discussion

Ms. Cox Lamm discussed Chapter 2 from where the previous session left off. She asked if anyone on the TMAC knew when more information would be available on the FIMA Road to Resilience Reorganization, as it could impact some of the pathways they are considering. Mr. Rodriguez mentioned that there is a November 1, 2022, milestone that leadership within FIMA will discuss, and after that, he may be able to answer the question in more detail. Mr. Rodriguez also mentioned that the reorganization will not likely affect any of the recommendations coming out of this council. The TMAC agreed to move forward with limited information on the reorganization as it is unlikely to significantly impact the outcomes of TMAC's efforts.

Ms. Cox Lamm pivoted to the topic of partnerships and highlighted how partnerships are a pathway to overcoming barriers of trust. There was a discussion on how partnerships can be leveraged to provide services and education to disadvantaged communities to enhance their understanding of mapping products.

There was a common sentiment that the group was eager to hear from communities and additional SMEs.

Mr. Bellomo asked for additional comments about the contents of this chapter, and after hearing none, he moved on to the next agenda item.

Overview of Tomorrow's Agenda and Next Steps

Mr. Bellomo listed some of their main takeaways from the meeting. Regarding the definition discussion, it seems necessary to graphically describe the differences between the definitions of disadvantaged communities and socially vulnerable populations, perhaps through a Venn diagram.

A need for a briefing on how tribal communities are treated within the NFIP and whether there are differences between them and other jurisdictions came to light. Also, there was a discussion on how disadvantaged communities have characteristics that apply to both urban and rural communities. Regarding the stakeholder engagement group, there was a conversation on the survey that will be implemented. There were many other conversations highlighted by Mr. Bellomo. Mr. Bellomo stated that the group will meet at the same location the next day at 8:00 am ET.

Closing

Mr. Bellomo thanked everyone for their time, effort, and considerable work put towards this draft annual report. He then concluded the meeting.

The meeting adjourned approximately at 4:35 p.m. ET.

Technical Mapping Advisory Council (TMAC)

In-person/Virtual Hybrid Public Meeting Notes

October 25, 2022, 8AM - 5PM ET

TMAC Members

Steven Aichele, *USGS Representative*
Stacey Archfield, *USGS, Department of the Interior Designee*
Doug Bellomo, *AECOM, Chair*
Vince DiCamillo, *Stantec Consulting, Mapping Member, Vice Chair*
Ronald Jacobson, *Coleman Engineering, Surveying Member*
Carey Johnson, *Kentucky Division of Water, State CTP Representative*
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Henry Cauley, *Team Deloitte*
Milani Chatterjilen, *AECOM*
Sonia Clemens, *AECOM*
Kat Friedman, *Michael Baker*
Necolle Maccherone, *Atkins Global*
Jennifer Marcy, *Atkins Global*
Sloan Oliver, *Team Deloitte*
Molly Tuttle, *AECOM*

Other Attendees

Chad Berginnis, *ASFPM*

David Conrad, *ASFPM*

Gus Norrbom, *U.S. House Committee on Science, Space, and Technology*

Purpose

The purpose of this meeting was for the TMAC members to discuss and vote on the content of the 2022 TMAC Annual Report Outline. Any related materials will be available upon request prior to the meeting to provide the public with an opportunity to review the materials.

Welcome, Roll Call, Administrative Items, and Opening Remarks

Mr. Brian Koper welcomed everyone to the in-person and virtual public meeting. He then took roll call and explained the differences between public and administrative meetings. Mr. Doug Bellomo then did a comprehensive review of the agenda.

Chapter 3 Discussion

Mr. Jeff Sparrow began this discussion but stating the focus of this chapter, which is the unintended consequences of Risk MAP when it provides or does not provide products.

Mr. Ron Jacobson gave a comprehensive overview of the chapter and opened it up for comments and questions from the TMAC.

Ms. Maria Cox Lamm inquired about whether differences in outdated, bad, and absent data were distinguished in this chapter, as they have different implications. Mr. Sparrow stated that having outdated data is just as unfortunate as having no data. Mr. William Lehman added to the discussion that good and bad data matters a lot in the current binary risk regime, but it may matter less in a graduated risk program; this is a fundamental issue in using maps for both regulatory and communication processes. Mr. Bellomo inquired about the possibility of a metric to understand if the SFHA is over or under-estimated. This could mitigate unintended consequences, such as over- or under-investment. Ms. Cox Lamm stated that communities rely heavily on flood risk products and that potential recommendations could relate to access to training and the nature of training for disadvantaged communities.

Mr. Luis Rodriguez references the sections on unintended consequences and benefits of Risk MAP. He stated that one change FEMA is considering is to make flood risk product data available to anyone. Mr. Rodriguez discussed available data policy and the possibility of better information outside of the regulatory map.

Mr. Bellomo suggested a table to show the unintended consequences and benefits of different types of data that are listed in this report.

Mr. Sparrow requested that members of the TMAC share relevant case studies for this section. Ms. Cox Lamm offered to gather case studies from South Carolina communities that highlight the positives and negatives of receiving FIRMs.

Mr. Ron Jacobson mentioned the history of redlining in this country and how it affects flood risk and disadvantaged communities.

Ms. Cox Lamm commented on the overarching theme of aptitude of data delivery and how communities help and resources to understand the data they have. To accomplish this, Ms. Cox Lamm stated that the importance of floodplain management needs to be elevated in local

government. Mr. Rodriguez suggested hearing from a representative of the BRIC program to speak to the TMAC.

Mr. Bellomo gave an overview of the conversation and thanked this subcommittee for their work. The conversation on this chapter then concluded after hearing no further comments.

Break

The TMAC adjourned for a short break.

Chapter 4 Discussion

Ms. Cox Lamm gave an in-depth overview of all new content and key points in this chapter. She highlighted the timeline and process of this chapter as well as ways to improve processes for CTPs. Mr. Bellomo commented on the process and stated that there is an opportunity to recommend to FEMA ways to decide when regulatory or nonregulatory products are needed.

Break

The TMAC took a brief break due to a fire drill that took place in the on-site location.

Continuation of Chapter 4 Discussion

Mr. Bellomo began the conversation by reminding the TMAC of the rest of the agenda for the day and then handed it off to Ms. Cox Lamm to finish discussing Chapter 4.

Mr. Sparrow asked the group if there need to be different engagement processes with disadvantaged communities versus political jurisdictions that participate in the NFIP. Ms. Cox Lamm posed the question of if a decision was made to not map an area with a regulatory product, and it flooded, would there be an increased liability? Mr. Sparrow stated that liability must be baked into an objective process. Congress has identified “shalls” and “mays” that exemplify their processes and priorities. There was a conversation on liability correlated with responsibility.

Mr. Bellomo commented on uncertainty by reiterating the need to compare and contrast consequences with benefits to get the full picture to best mitigate uncertainty.

Ms. Cox Lamm then highlighted questions the subcommittee had for the broader TMAC regarding the current engagement process. There were questions regarding the themes of the chapter, such as inclusion and collaboration, information sharing, diverse and inclusive partnerships, accessible data, and capacity and skill. She then shared the full list of questions the aim was to answer for this chapter and asked for additional comments. Mr. Bellomo inquired about deliberate considerations of disadvantaged communities and how they can best be supported with Justice 40 in mind.

There was a conversation between multiple TMAC members on the active efforts to engage communities, particularly disadvantaged communities, to provide input into this report. It was suggested to also reach out to state coordinators for their input. The importance of data to verify or disprove preliminary assumptions was also discussed.

Many TMAC members engaged in a conversation around engagement, specifically the motivations behind engagement and the challenges to accomplish meaningful engagement.

The conversation on this chapter concluded to begin the public comment period at the designated time.

Public Comment Period

Mr. Koper began the public comment period and gave an overview of the associated rules and regulations. Mr. Koper requested that members of the public interested in speaking indicate so as no additional written comments had been received.

Chad Berginnis, the Executive Director of the Association of State Floodplain Managers, verbally provided two comments. A written version of these comments is provided at the end of this document.

David Conrad, the Sr. Water Resource Policy Advisor in the Association of State Floodplain Managers, verbally provided a comment. A written version of this comment is provided at the end of this document.

After nothing further was heard, Mr. Koper concluded the public comment period at 11:58 a.m. ET.

Continuation of Chapter 4 Discussion

The continuation of this discussion began with the appeal period and questions around time periods and clarity. Ms. Cox Lamm, Mr. Bellomo, Mr. Giberson, and Mr. John Ebersole engaged in a conversation about regulatory and non-regulatory products, due process requirements, and data-informed decision-making. There was a discussion of a possible recommendation that would encourage continued engagement beyond the mapping updates.

Ms. Cox Lamm mentioned that there are case studies they are looking into but are open to receiving suggestions from other TMAC members on case studies to include in this chapter. Mr. Bellomo then began an overview of key points from the discussion of Chapter 4 that prompted discussion within the TMAC. Mr. Bellomo thanked Ms. Cox Lamm and the rest of the team for their work on this chapter.

Lunch

TMAC adjourned for a 1-hour lunch.

Chapter 5 Discussion

Mr. Sparrow began a conversation on Chapter 5 after giving a brief introduction to the chapter. The chapter focuses on the investment decisions FEMA should make for disadvantaged communities. Ms. Stacey Archfield then gave a comprehensive overview of the outline and content currently in the chapter. Ms. Archfield noted that there are many resources available in the draft report that the team has compiled. She then spoke on how the recommendations would be put out but first, the limitations of the data need to be evaluated and considered. Mr. Sparrow

then stated that there may not be one data set, but rather, FEMA may have to consider and/or combine different datasets in order to get all relevant data points for a comprehensive view of the population.

Mr. Rodriguez shared that the Risk MAP program has been discussing their priority areas and when looking at investments going forwards, the program looks to allocate resources across all priority areas. Connected with that is a measurement of the program's performance among the priority areas. It was suggested that the group consider a measurement to address resource allocation, or something of the sort.

Mr. Bellomo suggested the TMAC have pointed elements in this chapter on making investment decisions today with what we know but adding the caveat that the decisions are no more static than the maps themselves and should be updated when needed.

Ms. Cox Lamm mentioned the process of benefit cost analysis that may remove populations from a study to increase statistics and how it would be an interesting analysis to see how many times this has happened. She elaborated that it makes it difficult to base current decisions on historical decision making when this has happened.

Ms. Archfield asked for clarification on TMAC filling gaps in research versus bringing attention to the gaps in the report. Mr. Bellomo responded that either is acceptable and that when trying to fill a gap, it does not need to be complete, but it is acceptable to have some findings, positive or negative, associated with the gap. Mr. Bellomo thanks the Chapter 5 group and began an overview of the meeting

Overview and Next Steps

Mr. Bellomo thanked everyone for their work and professionalism before moving into a comprehensive overview of the two-day meeting.

Mr. Bellomo mentioned the benefits of meeting in-person. He then reminded the TMAC of the administrative meeting in November where the TMAC would review a new draft of the Annual Report, based off of the public comments and extensive conversations had in this meeting.

Closing

Mr. Bellomo reiterated his thanks to the group and closed the meeting so the subcommittee could break out into working sessions.

The meeting adjourned approximately at 3:08p.m. ET for subcommittee working sessions.



National Association of Flood & Stormwater Management Agencies
PO Box 56764, Washington, DC 20040 202-289-8625 www.nafsma.org

October 19, 2022

The National Association of Flood and Stormwater Management Agencies (NAFSMA), an organization of public agencies whose function is the protection of lives, property, and economic activity from the adverse impacts of storm and flood waters, appreciates the opportunity to comment on TMAC's draft Outline for the 2023 TMAC Report. NAFSMA's mission for more than 40 years has been to advocate for public policy and encourage technologies in watershed management that focus on stormwater, flood protection and floodplain management.

Most, if not all, of NAFSMA's members participate in the Federal Emergency Management Agency's (FEMA) National Flood Insurance Program (NFIP), and the Community Rating System (CRS), and many are cooperating technical partners with FEMA on flood mapping initiatives and carry out local and regional mitigation activities in partnership with FEMA.

NAFSMA has a long history of working closely with FEMA on its flood-risk management related programs, including Risk MAP, and has had representatives participating on TMAC since it was re-established under the Biggert-Waters Flood Insurance Act of 2012. NAFSMA also participated in the earlier TMAC in an advisory capacity.

In reviewing the draft outline for the 2023 TMAC report, NAFSMA has identified three key issues that we would like to raise for the Council's consideration as you move forward drafting this important report

- NAFSMA Urges Broad Outreach and Inclusion of Subject Matter Experts in TMAC work on this report. With the tasks spelled out in the May 25, 2022, letter to TMAC from FEMA Assistant Administrator for Risk Management Mike Grimm being different in nature from past mapping- and insurance-related requests to TMAC (more focused on social and governance issues), NAFSMA recommends that TMAC strengthen its outreach to include additional representatives from local and regional governments as well as non-governmental organizations and academics with strong experience working on equity issues.

- Use of the term “Communities” needs to be clarified in the draft outline.
NAFSMA appreciates the comprehensive list of key terms and definitions and background document prepared to help guide next year’s report. NAFSMA suggests that while the terms community and disadvantaged are defined under the accompanying terms and definition document they need to be further defined and clarified, especially in the outline. In the draft outline for section 3, it becomes difficult to comprehend who is being referred to by the term “communities.” In some cases, where access to grant funds is discussed, the draft seems to be referring to local governments rather than communities as defined under the key terms. It would be helpful to provide additional clarification in the outline even going to the point of making it clear whether a local government is participating in the National Flood Insurance Program or not since this participation makes a difference in the local government’s responsibilities.

- NAFSMA Encourages TMAC to continue to focus on the benefits of Updated Risk MAP products for disadvantaged communities.
While the FEMA memo to TMAC asked the Council to evaluate and recommend ways to identify and limit the potential negative impact and unintended consequences that might result from Risk MAP, NAFSMA strongly supports the approach outlined in the draft to report on the benefits of updated Risk MAP products as well.

Thank you for the opportunity to comment on the TMAC’s draft outline for its 2023 Report. Please contact Susan Gilson at sgilson@nafsma.org or (202) 289-8625 with questions.

Comment submitted for TMAC Public Comment Period during the public meeting (virtual) on Monday 10-24-2022, by Nastasha Earle-Young, North Carolina Department of Transportation.

I have no expertise in this kind of mapping and analysis. However, I am aware that the City of Raleigh failed to take into account the potential for new development being permitted to increase flood risks for low income minority neighborhoods downstream. They were aware at the time that these neighborhoods were already disproportionately affected by flooding, including isolation of some areas with only a single, easily closed bridge connecting them with the larger community. They were aware that these were low income and traditionally underserved people, aka “disadvantaged community” under this program. What they did not seem to take into account as part of decision making was the need to comply with Title VI or Environmental Justice.

It is likely not that difficult to create maps and other data sources that would document, predict and help visualize areas that already flood or are likely to flood more in the future. What is needed is a way to inform all decision makers that impacts are likely to occur in an inequitable way, and to inform all local, state and federal agencies involved in time to initiate outreach, affect decision making and require mitigation when avoidance isn’t possible.

In other words, the process needs to have these major decision points happen sooner and with full accountability for whichever branch of government is proposing inequitable decisions and actions. The products should support the process. Everything proposed in that letter sounds worthwhile but it will not accomplish anything substantive if it is not used to make better and more equitable decisions. The current process appears to allow one level of government to make a development decision that then commits other levels of government to fix the problems – often recurring – unilaterally created by another.

One specific proposal may relate to transportation. The third bullet on page 2 states “Decreasing access to vital community programs dependent on tax revenue”. The concept of decreasing access needs to be expanded to mean literal access to the larger community. Potential isolation following flood events is easily projected. What has become obvious from NCDOT’s resiliency projects is that we currently lack the ability to assess differences in socio-economic effects on certain populations but particularly lower income, disabled or elderly persons. Lower income persons are much less likely to have paid leave, work from home options, or the financial capacity to travel long detours to access jobs, goods and services. Disabled and elderly persons are more likely to be cut off from paratransit, ridehailing, emergency services and the like while depending on these more than the general public. Accessibility measures should be weighted or otherwise reflect the disproportionate effects on low mobility/low wealth populations and disadvantaged communities stemming from flood events and similar natural disasters.

I honestly do not understand the intent of “vital community programs dependent on tax revenue”. The inability to get to work for those living paycheck to paycheck is a critical need. Accessibility needs to be expanded, not limited to whatever was intended by this statement.

Sections 2.2 Existing Barriers and Section 3 Unintended Consequences of Risk MAP of the Draft Report Outline are interesting. In some cases housing is affordable because of these risks, so some consideration should be given to the potential for displacement once risks are reduced. For those facing being unhoused, how do they evaluate the risk of flood events vs the risk of being gentrified? How much affordable housing stock was lost in New Orleans’s Ninth Ward due to the high cost of new housing

standards? The EJ community already questions the extent to which zoning, building codes and code enforcement are inequitable or produce inequitable results. Historically redlined communities were usually in less desirable areas, and if The Bottoms have flooded for the past century, it isn't clear how this program will help make this better. These same areas also tend to map as heat island. I realize this is specific to flood events but many of these communities face multiple environmental threats (air quality, groundwater contamination, lead pipes, etc.)

Please let me know if you have any questions.

Thanks,
Nastasha

Nastasha Earle-Young
Statewide Initiatives Engineer
Transportation Planning Division
North Carolina Department of Transportation

Comments of Chad Berginnis, Executive Director, Association of State Floodplain Managers for meeting of FEMA Technical Mapping Advisory Council, delivered during public comment period Wednesday, 10-25-2022.

Thank you for the opportunity to provide public comments today. On behalf of the Association of State Floodplain Managers, I have two comments.

The first comment is with regards to the 2022 outline and tasking order. It seems that there is a very heavy emphasis on costing everything the maps may result in, such as the statement: “identify and limit the potential negative impact and unintended consequences that might result from Risk MAP products.”

This seems to set up recommendations on mapping that will say to not do better mapping or complete the nation’s flood mapping because showing more flood risk may cost lower income populations more money. That is a bogus argument, comparable to leaving disadvantaged people and communities in high risk areas to get flooded and then to lose their home value again and again. It is creating a moral hazard, and not mapping such populations would result in long-term harm and threats to life and property for those disadvantaged people and communities. FEMA does not seem to ask TMAC to recommend what those long-term harms may be, and to compare those to the potential negative items listed in the tasking order.

We must remember that the perceived and real consequences of costs come from both floodplain management standards and insurance requirements. And while we could spend a lot of time arguing why those requirements are both necessary and important, it is our hope that TMAC doesn’t conflate these other elements of the NFIP in order to put limits on what we see as a basic necessity in the program, which is to get the job done mapping the entire country in accordance with the national flood mapping program.

Second, we wish to be on record expressing concern about the proposed reorganization of FIMA and the merging of it with preparedness under the banner of a resilience organization. As it relates to flood mapping, we cannot afford to dilute the focus or mission of flood mapping, nor contribute to funding a larger resilience bureaucracy much like how FEMA continues to contribute to DHS by using a portion of its budget to pay for a DHS tax. ASFPM strongly believes in resilience and thinks that it is a whole-of-FEMA function, not through the creation of a new resilience stovepipe; rather an outcome to be achieved in all divisions and directorates of FEMA. Perhaps one of the greatest worries, however, is the focus of such a resilience organization once the current, capable leaders like David Maurstad are gone. It is not unreasonable to think that a future leader may be much more focused on preparedness as it is a core element of emergency management that cannot and should not be diminished. What is the priority and importance of the NFIP, or mitigation programs then? A reorganization should never depend on those currently in positions now to ensure future success. We are extremely disappointed that none of the NFIP’s partners, stakeholders or customers have been truly consulted about this very significant change prior to being so far down the road in the process.

Thank you.

Chad Berginnis, cberginnis@floods.org, tel: 608-828-3000 | cell: 740-258-3419

Comment Submitted for TMAC Public Comment period during public meeting (virtual) of Tuesday 10-25-2022, by David R. Conrad, Senior Water Resources Policy Advisor, Association of State Floodplain Managers, Chevy Chase, MD, 202-365-0565; conrad.david.r@gmail.com or david@floods.org email.

Comment:

The Association of State Floodplain Managers (ASFPM) was very glad for the short discussion in yesterday's (10-24) TMAC meeting that referenced the work that has been going on internally at FEMA for a potentially significant, but possibly problematic reorganization of FEMA's program delivery and policymaking structure. This is purportedly to improve community hazards resilience across the nation.

ASFPM strongly supports resilience as an important goal for all the nation. We are concerned, however, with some of the suggested management and organizational changes, where we see some serious possible impediments to a successful resilience improvement effort. We do not believe it would be a prudent approach for FEMA, organizationally, to reduce the focus and importance of floodplain management, for instance.

Both yesterday and thus far today, TMAC's discussion, especially in how to improve data, support, and assistance to disadvantaged jurisdictions, tribes, and others, is hugely important; but we believe the way FEMA is organized to deliver existing and potentially new and expanded services could itself be a material factor in the very potential for success.

We have recently written Administrator Criswell regarding both our initial concerns and the need for engaging key stakeholders -- from the outset -- to design any reorganization, so as not to further isolate and "stovepipe" key functions, but instead to better integrate programs for all customers successful involvement.

We agree with the point made that a reorganization would not change the underlying laws and programs FEMA must administer, but that it may be entirely appropriate for TMAC to comment wherever it believes the organizational structure could alter or undermine the benefits of delivering the programs.

We would strongly urge TMAC to seek more information on any significant reorganization that at least would impact on the NFIP and major mapping and mitigation programs, and not be bashful in providing comments and seeking input from stakeholders and FEMA customers.

We would be happy to share with you our recent October 14, 2022, letter to Administrator Criswell (attached with these comments) on this subject and we look forward to working with TMAC in the coming year. We're very excited about the topics TMAC is planning to address in the 2023 report.

Disclosure. We would also like to reiterate the points made in yesterday's meeting that Disclosure is a critical weakness right now in most states. It is critical that potential buyers and

sellers of properties have access to and can use flood risk histories and information to make good and appropriate choices and investments.

We urge the TMAC to dig into these issues and concerns in the forthcoming report effort.

Again, thank you for the opportunity to provide comments, and we look forward to working with the TMAC in the coming months ahead. Please do not hesitate to contact me or ASFPM with any questions or on items with which we may be able to provide assistance.

Very best, David Conrad, ASFPM