

October 26, 2005

Mr. Joseph Weber, Regional Engineer
Federal Emergency Management Agency
Region 10, Mitigation Division
130 228th Street SW
Bothell, WA 98021-9796

Subject: October 2005 Business Plan Update

Dear Mr. Weber,

Introduction

The purpose of this letter is to provide updated information relating to the Flood Map Modernization Business Plan for Oregon (March 2004). The Department was notified via the regional mapping center (RMC) in mid October that FEMA headquarters had released fiscal year (FY) 2006 "Business Planning Guidance" and that updated state business plans were to be submitted by October 31, 2005. In reviewing the guidance document, we see that states are asked to perform assessments of their business plans and make adjustments as necessary. FEMA indicates that for business plan updates to be included and considered in the fall 2005 update of the Multi-Year Flood Hazard Identification Plan (MHIP), states must submit the updates by October 31, 2005.

In response to FEMA's request, we are submitting information that could be pulled together within the two-week window between the RMC notice and the deadline. We have not had time to fold this information into the 2004 business plan so this letter plus attachments effectively supplement the 2004 plan. Some of the enclosed information has not been discussed with FEMA Region 10 staff or at least not discussed in as much detail as the Department would prefer. This is due to a variety of factors including but not limited to deployment of FEMA Region 10 staff to the Gulf Coast in response to Hurricanes Katrina and Rita and some production delay on our end. As soon as feasible, our offices should engage in discussion of the enclosed information.

FY 2006 Sequencing

In late summer, Region 10 requested that the state review and comment on the proposed sequencing of FY 2006 projects. For Oregon, the following counties are proposed for mapping starts in FY2006: Benton, Columbia, Coos, Curry, Douglas, Harney, Josephine, Lincoln, Linn, and Tillamook. Here we summarize information provided in response to this earlier request. DLCD did not outright object to having the above-listed projects start in FY2006. However, we did express the following concerns about these projects.

Five of the ten project starts for FY 2006 are counties with frontage on the Pacific Ocean. On the one hand, the 2006 sequencing responds to the state's identification of coastal area mapping as a high priority for Oregon. But the budget information shown in the MHIP clearly does not account for any coastal studies. The Department has expressed at numerous

times, including within the state business plan, that coastal area mapping supported by new coastal studies is a top priority for the state.

Significant advances have been made in the scientific understanding of coastal processes affecting the Oregon coast since the coastal counties were originally mapped by FEMA. Flood Insurance Rate Maps (FIRMS) need to be updated based on current knowledge about coastal processes. For example, we know that a much greater significant wave height should be used in calculating stillwater elevations compared to what was used for the original velocity zone mapping. Also, there is a need to re-evaluate velocity zone mapping due to the incredibly dynamic coastal environment, i.e. to consider longer-term erosion and accretion that has occurred over the last fifteen to twenty years. From the state perspective, DFIRMS created for coastal counties in the absence of new coastal studies would not be “modernized.” This means that ½ of the FY 2006 projects may not contribute to FEMA’s map modernization metrics unless additional funding from some source is secured for coastal studies.

The Department inquired with Region 10 about why Harney County was given a FY2006 start when counties with higher populations and more flood insurance policies were being delayed. We did not object to FEMA moving forward with Harney County since ultimately all the counties need to be included but requested clarification of FEMA’s reasoning for the FY2006 start. We were told that Harney County was selected because the smaller budget for the project matched up with funds projected to be remaining for FY2006. We concurred that this was a reasonable and prudent rationale for a FY 2006 start. We understand that the Harney County project will likely be a digital conversion project.

The Department also requested information about Marion County DFIRMS. The MHIP indicates that DFIRMS were effective in FY 2004. We are not convinced that digital maps available for Marion County are actually in the DFIRM format, i.e. should they count as “modernized.” Additional funding may need to be programmed into the MHIP to address conversion to the DFIRM format. The MHIP currently shows no funds for work in Marion County and instead references past FEMA efforts for the county.

Draft Data/Design Report

Enclosed is a draft report that the Department has been working on with our key map modernization partner at the state-level, the Geospatial Enterprise Office (GEO). The final draft was just recently delivered to DLCD by GEO. The report will be finalized after the Department’s map modernization specialist (recruitment ongoing) has reviewed the document, held discussions with Region 10 and RMC staff to obtain feedback, and made final changes to the report. We may also run the draft report by the Map Modernization Working Group, assuming that a meeting of the group can be organized in the near term.

We are providing the draft report now as a preliminary “update” of the 2004 business plan. The draft report presents significant new information. It provides a refined vision and more details regarding the potential state role in map modernization. The report provides greater detail than the 2004 plan regarding a conceptual design for a state information technology system, including staffing, to support the development and use of DFIRMS in Oregon. Within the draft report, we continue to project costs for state support services and a need to secure sufficient funding to cover those costs. Note that the Department still lacks sufficient resources to fully implement its vision for state support services.

The draft report also identifies existing and needed data for flood hazard mapping on a county-by-county basis. This part of the report should be of great interest to FEMA Region 10 as the information provided on data “readiness” could be used for analysis of MHIP sequencing. At a minimum, this information should be factored in to pre-scoping discussions with Oregon cities and counties with particular emphasis on explaining what type of DFIRM product is feasible based on available data and other factors. For example, should FEMA Region 10 and DLCDC further discuss FY 2006 starts for Columbia, Coos, Curry and Tillamook Counties given that these counties are identified as not being data “ready” in the draft report? Can data gaps be addressed in the short-term if the project starts are delayed? If these projects are started in FY 2006, then we certainly should discuss with these affected jurisdictions whether the end goal is to pursue digital conversions of existing FIRMS vs. more robust DFIRM products dependent on certain data. In general, the Department believes that digital conversions will result in improved and more user friendly maps but questions whether such maps should be deemed “modernized.” However, the Department recognizes that funding limitations mean that digital conversions may be the most feasible first step in pursuit of map modernization for some counties.

FY 2006 Project Budgets

A concern we have about all mapping projects (and which thus is applicable to the FY2006 starts) is whether the projected MHIP budgets account for redelineation of floodplain boundaries based on best available topographic data. As is explained in the attached draft report, we have found a lot of base data to be available at the local and state government levels for many counties. It is in the best interests of Oregon’s local governments, the state, and FEMA to ensure that best available data is utilized. FEMA Region 10 has cautioned that MHIP budgets may not account for the full cost of redelineations based on new data. For the FY2006 starts, we do not anticipate that FEMA Region 10 will be able to fully determine cost factors until project scoping when more detailed discussions with local governments occurs regarding available data. However, the data “readiness” information provided in the attached draft report may assist FEMA Region 10 and the RMC with preliminary determination of cost factors and thus updates to FY 2006 budget projections in the MHIP.

Summary

We hope that the information provided herein is helpful to Region 10 and the RMC with respect to the current round of MHIP updating. As soon as is feasible, we would like to discuss with your office the information submitted herein and also planning for future updates of Oregon’s business plan and the MHIP. We re-emphasize that the enclosed report is not deemed final, largely because we have not yet had sufficient opportunity to discuss the report with your office. Receiving feedback and guidance from FEMA Region 10 regarding the report recommendations is particularly critical to the Department’s ongoing map modernization efforts.

Sincerely,

Christine Valentine, Coordinator
Natural Hazards Program

Enclosures:

Final Draft *Data Assessment and Conceptual Design Report*, Including Tables A & C
as attachments (October 26, 2005 version)

cc w/enclosures

Mark Riebau/Darcy Rehtien, RMC 10

cc w/out enclosures

Denise Atkinson, FEMA Region 10

Cy Smith, DAS-GEO

Steve Williams, DLCDCoastal Field Office