



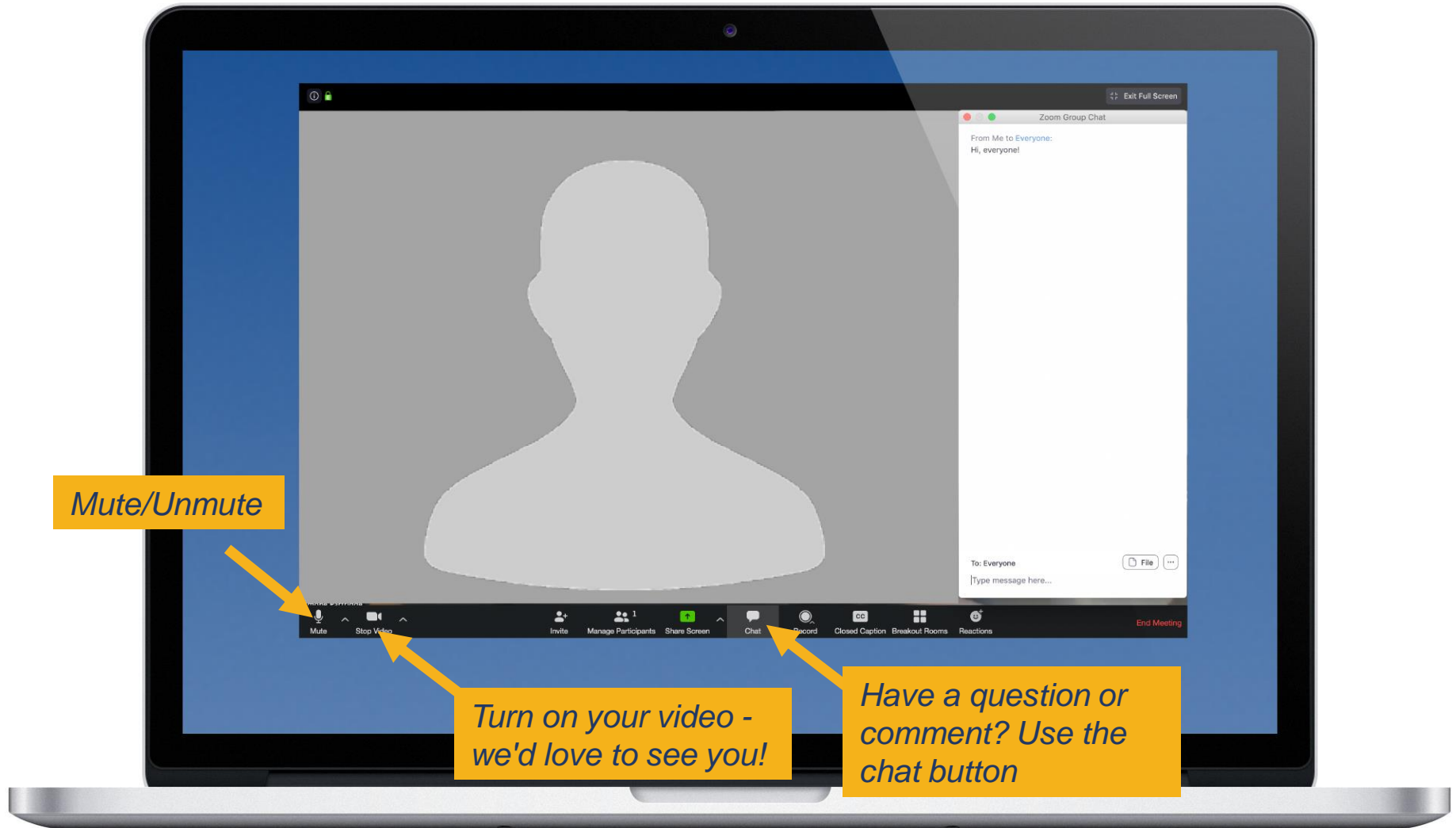
National Flood Insurance Program (NFIP):

Preliminary Digital Flood Insurance Rate Map (DFIRM) Final Consultation
Coordination Officer (CCO) Meeting for Miami County, KS

January 24, 2023

*While we are waiting, please enter your
name and community in the chat box!*

How to use Zoom



Rules of the Road



- Attendees will be muted during the presentation, to help eliminate background noise.
- Check out the chat to ask questions during the presentation! Or feel free to “raise your hand.” We will pause for questions at various stopping points, and we have several poll questions.
- If you want to share your video, please do!
- For technical difficulties, send a private chat to Bill Pace or email William.Pace@ks.gov
- We’ll be recording this webinar for those who aren’t able to attend today.

4

Today we will focus on the regulatory component of this work and how this affects your community.

But remember that the ultimate goal is to understand your flood risk so you can better protect your community.



Welcome & Introductions



FEMA – Region VII

- **Bryan Murdie**– *Risk Analysis Branch Chief*
- **Dawn Livingston**– *Regional Project Officer*
- **Rick Nusz** – *Regional Engineer*
- **Chris Parsons** - *Insurance Program Specialist*

Cooperating Technical Partner – CTP

- **Tara Lanzrath, CFM**– *State NFIP Coordinator*
- **Joanna Rohlf, CFM, GISP** – *Floodplain Mapping Coordinator*
- **William Pace, CFM** – *Floodplain Mapping Specialist*
- **Patrick Bonine** – *Floodplain Mapping Specialist*
- **Cheyenne Sun Eagle, CFM**- *NFIP Specialist*

Stantec

- **Will Zung, PMP, CFM** – *Principal, Water Resources Manager, Project Manager*
- **Tom Morey CFM** – *Outreach and Floodplain Management Specialist*
- **Ryan Powell** – *Post-Preliminary Processing Specialist*

Today's Goals

Coming out of this meeting, we want you to understand:

1

The NFIP requirements related to this work and how we got to where we are today

2

Your flood map, what it means, and a property owner's options for a closer look
(i.e. LOMC!)

3

The appeals and map adoption process and what your role is

4

The importance of community outreach and flood insurance



Goal 1

Provide an overview of the NFIP requirements related to this work

What is the NFIP?



FEMA

- The National Flood Insurance Program (NFIP) enables property owners in participating communities to purchase insurance to protect themselves from losses associated with flooding.
- Participation in the NFIP is voluntary, based on an agreement between a community and the Federal government: if a community will **adopt and enforce a floodplain management ordinance** to reduce future flood risks to new construction, the Federal government will make flood insurance available within the community.

NFIP Goals



FEMA

Reduce the loss of life and property caused by flooding

Reduce rising disaster relief costs caused by flooding

Provide flood insurance (short-range goal)

Encourage wise use of the floodplain (long-range goal)

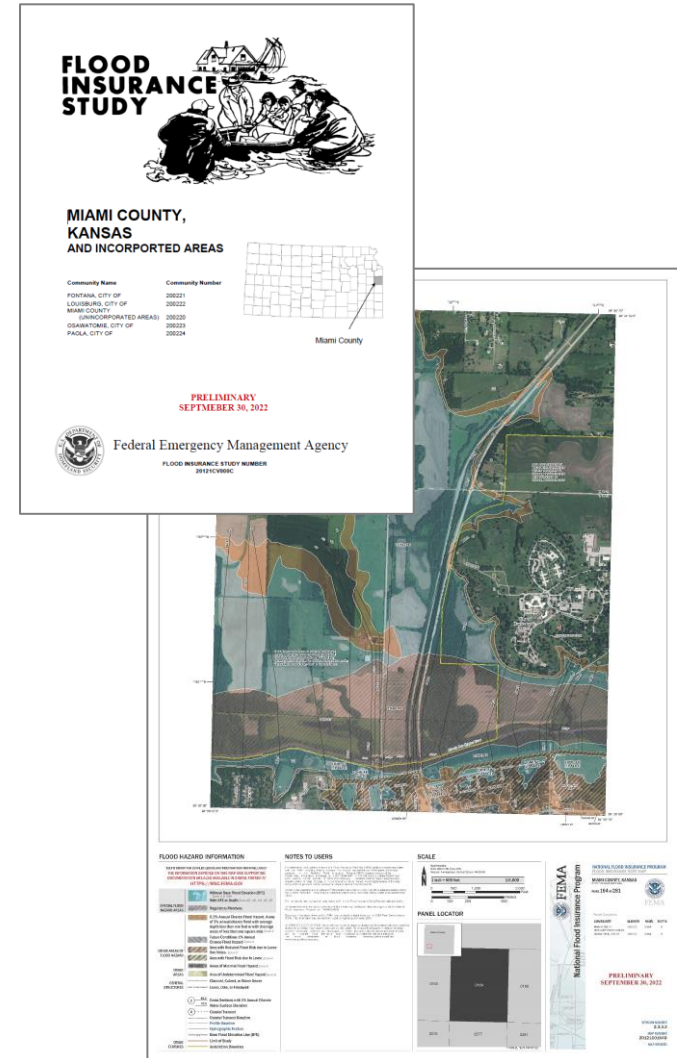


Accomplishing NFIP Goals



FEMA

- Publish maps that identify flood risk
- Educate the public about its risk
- Provide federally backed flood insurance to reduce financial risk
- Encourage development away from flood prone areas



Status Update

The Kansas Homeland Security Region J Hazard Mitigation Plan was updated in 2019.



Miami County
6 NFIP PARTICIPANTS:
Includes:
City of Osawatomie
Miami County



4,255
Osawatomie
34,191
Miami Co.

Population Based On 2020 U.S. Census Estimate



In the last 14 years, there have been 18 Presidential Disaster Declarations in Region J.



\$5,710,400
Flood Insurance Coverage



\$367,947
Osawatomie
\$684,497
Miami Co.

Total Losses Paid Since 1978

1,600
Osawatomie

14,041
Miami Co.

HOUSING
UNITS



28
Osawatomie

23
Miami Co.

Number of
Flood
Insurance
Policies

Goal 1

Review how we got to where we are today



Miami County- Mapping Update



Enhanced Zone AE

- Marais Des Cygnes River near City of Osawatomie: Model calibrated to gage flows and includes field surveyed structures
- Pottawatomie Creek near City of Osawatomie: Model calibrated to gage flows and includes field surveyed structures
- Interior Drainage behind City of Osawatomie Levee: Model provided by City of Osawatomie with levee accreditation. Zone AE for ponding greater than 3 feet deep.

Enhanced Zone AH

- Interior Drainage behind City of Osawatomie Levee: Model provided by City of Osawatomie with levee accreditation data. Zone AH for ponding 1 to 3 feet deep.

Miami County- Mapping Update



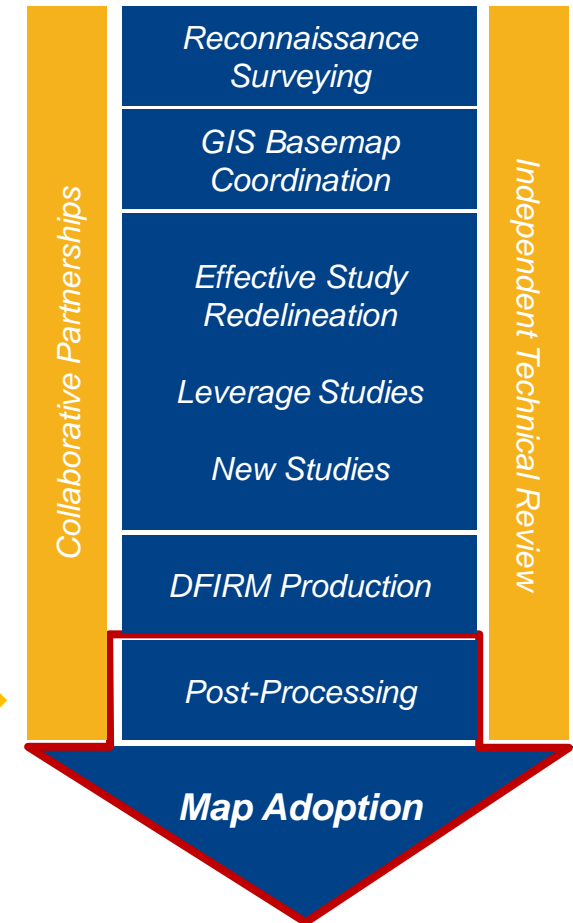
Base Zone A

- Marais Des Cygnes River near City of Osawatomie: Model calibrated to gage weighted regression equation flows, does not include structures
- Pottawatomie Creek near City of Osawatomie: Model calibrated to gage weighted regression equation flows, does not include structures
- Jordan Branch near City of Osawatomie: Model calibrated to USGS regression equation flows, does not include structures
- Plum Creek near City of Osawatomie: Model calibrated to USGS regression equation flows, does not include structures
- Unnamed Tributaries near City of Osawatomie: Model calibrated to USGS regression equation flows, does not include structures

Project Tasks

- ① Scoping
- ② Base Map Preparation
- ③ Survey and Topography
- ④ New Enhanced Studies
- ⑤ DFIRM and FIS Production
- ⑥ Post-Preliminary

Entering this Phase →



Background

- *LAMP Project Kick-off*
 - *December 11, 2013*
- *Initial Physical Map Revision Kick-Off*
 - *April 27, 2016*
- **Coordination Meeting**
 - **March 27, 2018**
- **Project on hold for Levee Data Certification**
- **Levee Accreditation approved**
 - **July 14, 2022**
- **Re-Kick-Off Meeting**
 - *August 8, 2022*
- **Preliminary Map Distribution**
 - *November 29, 2022*
- **Preliminary DFIRM Community Coordination Meeting**
 - *January 24, 2023*





Goal 2

Talk about your flood map, what it means, and what the options are if a property owners disagrees with what they see for their structure

Determining Your Flood Risk



Nearly everyone is at risk of flooding. Your map characterizes the degree of that risk.

High Risk

Identified as Zone A or Zone AE, a Special Flood Hazard Area (SFHA) on flood maps

Medium Risk

Shaded Zone X areas on maps. This means you still have flood risk we want you to know about, but you aren't required to purchase flood insurance

Low Risk

Unshaded Zone X areas on maps

High Risk Areas

What You Need to Know

- Where there is a 1% chance of flooding any given year
- Mandatory flood insurance requirements for mortgages from federally-backed lenders when the floodplain touches the structure
- If your community participates in the NFIP, you are required to obtain a floodplain development permit from the community. Regardless of participation, you may be required to get a permit from the State DWR.

Zones AE and A



*Please visit with Tara Lanzrath, the State NFIP Coordinator,
for more information*

Base Studies

What You Need to Know



Zone A

- Zone A studies were updated for this project by incorporating modeling and mapping from previous study in the County.
- For these areas, the map includes:
 - The 1%-annual-chance (100-year) flood zone (Zone A)
 - The Zone A study matches the rest of the County.
- The mapped Zone A does NOT include:
 - Floodways
 - BFEs

However, BFEs are on the KDA web map and specific BFEs can be requested via KDA's Base Flood Elevation Portal

Note that the delineated floodplains use LiDAR data

Medium Risk Areas

What You Need To Know



Shaded Zone X

- Shaded Zone X provides important information on:
 - Areas of the 0.2%-annual-chance (500-year) flood,
 - where we are seeing flooding here more and more
 - Areas adjacent to levees
 - where you still really want to keep an eye on flood risk, should the levee fail
 - Areas with average flood depths less than 1 foot
 - remember that 1 foot of water can cause up to \$30,000 in flood damage
 - Areas that will likely be future 1% floodplains, and therefore not ideal for future development

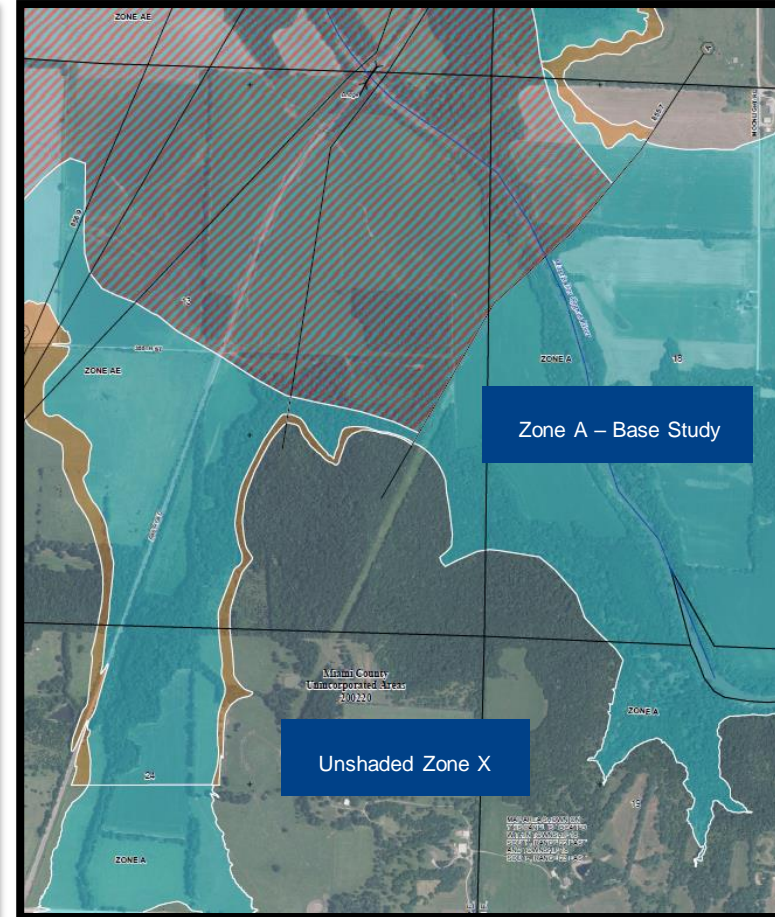
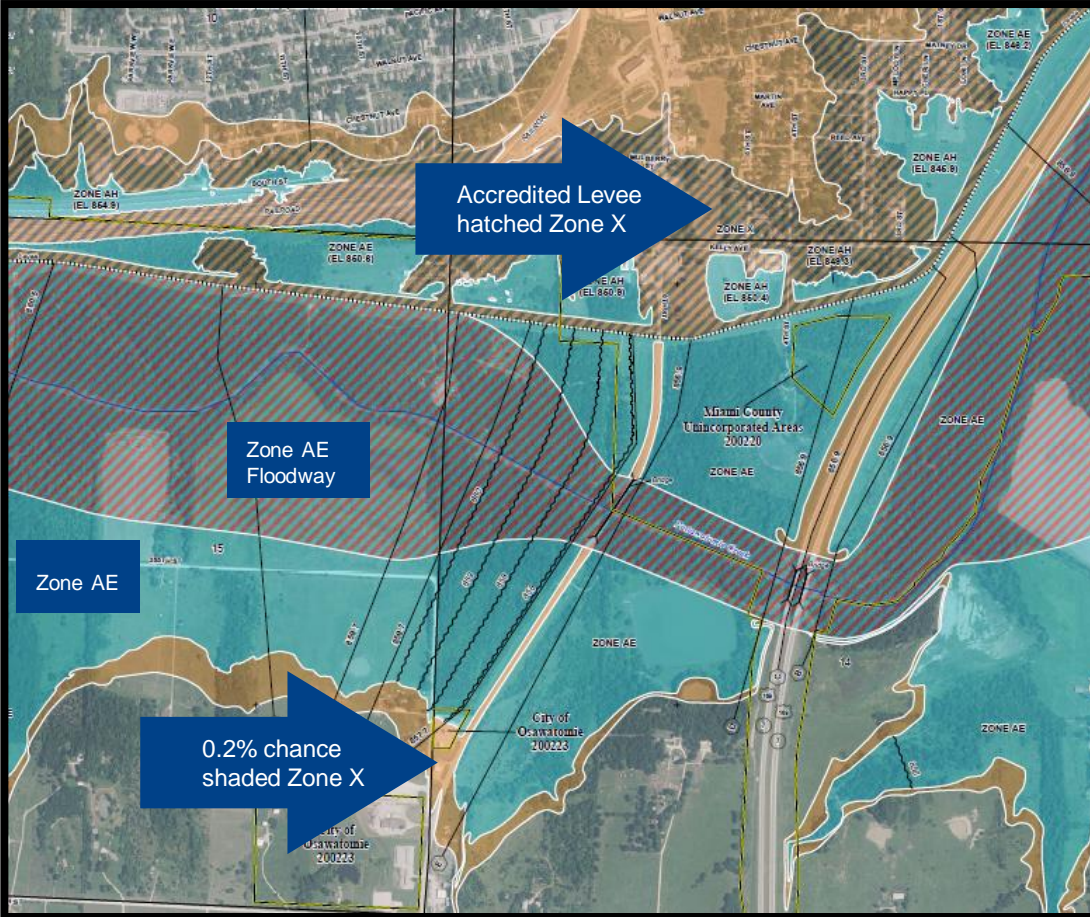
While there are no mandatory flood insurance purchase requirements in this zone, flood insurance is encouraged

Low Risk Areas – Unshaded Zone X



- Areas outside the 1%- and 0.2%-annual-chance flood zones
- No mandatory flood insurance purchase requirements

Example Preliminary FIRM Flood Zones



Base Flood Elevation Portal



Kansas Base Flood Elevation Portal

Home

About

Help

Portal Registration

First Name

Last Name

User name

Title

Phone

Email Address

Address

City

Zip

State

Register

Here's where you can
request BFE data for
Zone A floodplains.

[http://maps.kgs.ku.edu/
fpm_bfe/](http://maps.kgs.ku.edu/fpm_bfe/)

PER ASPERA



Options for Property Owners

Letters of Map Change

- Due to scale limitations, flood maps cannot reflect every rise and fall in terrain. A building may be shown in an SFHA even though it is above the BFE.
- To remedy this, FEMA uses the Letter of Map Change process
- This process allows property owners to submit information about the site and elevation of their structure when they believe that it has been inadvertently included in a designated flood zone



LOMA Candidate

LOMA (Letter of Map Amendment)

A letter from FEMA stating that an existing lot or structure that has not been elevated by fill would not be inundated by the 1%-annual-chance (100-year) flood

LOMA (Out As Shown)

A letter from FEMA stating that an existing structure is located outside the 1%-annual-chance (100-year) floodplain, even if portions of the property are within it

LOMR-F (Letter of Map Revision, based on Fill)

A letter from FEMA stating that an existing structure or parcel of land that has been elevated by fill would not be inundated by the 1%-annual-chance flood



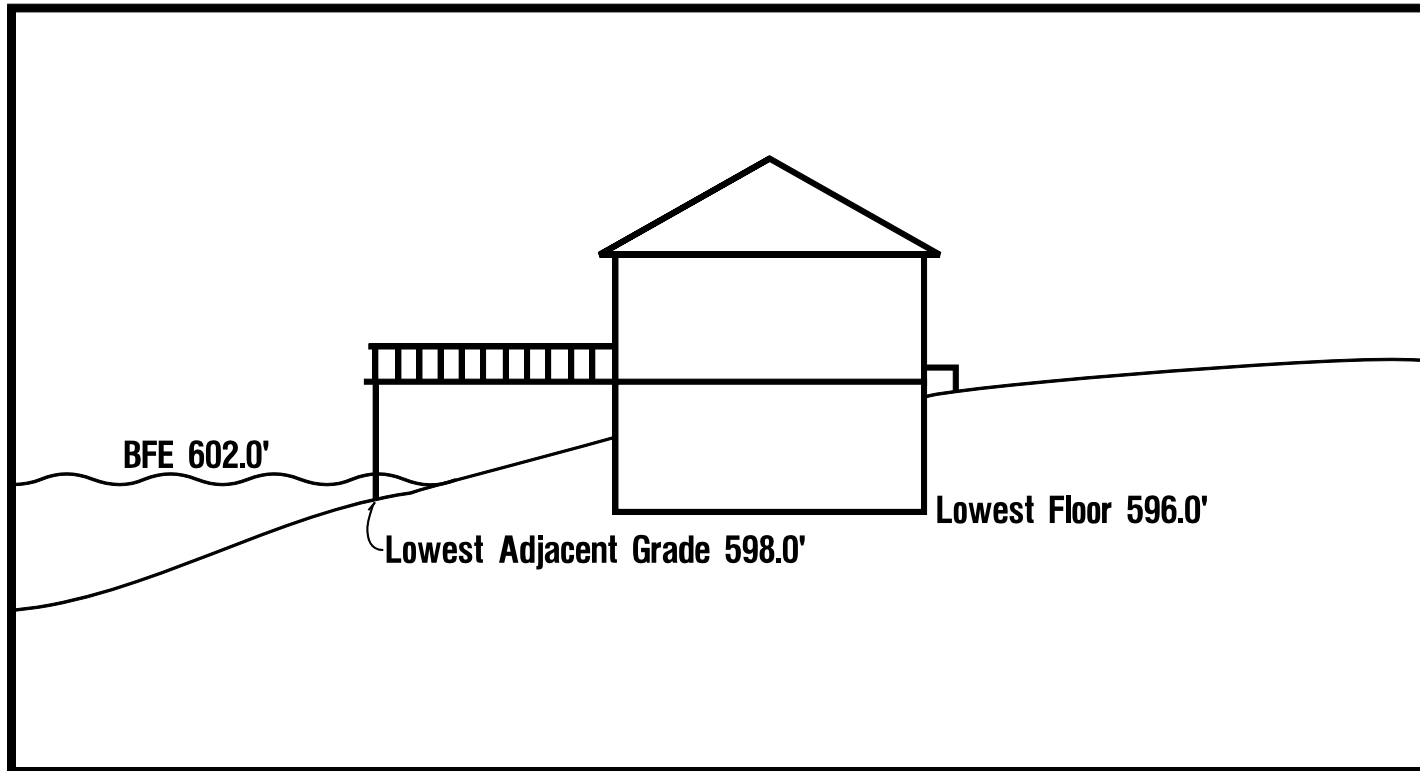
LOMA OAS

LOMA (Letter of Map Amendment): Natural Ground



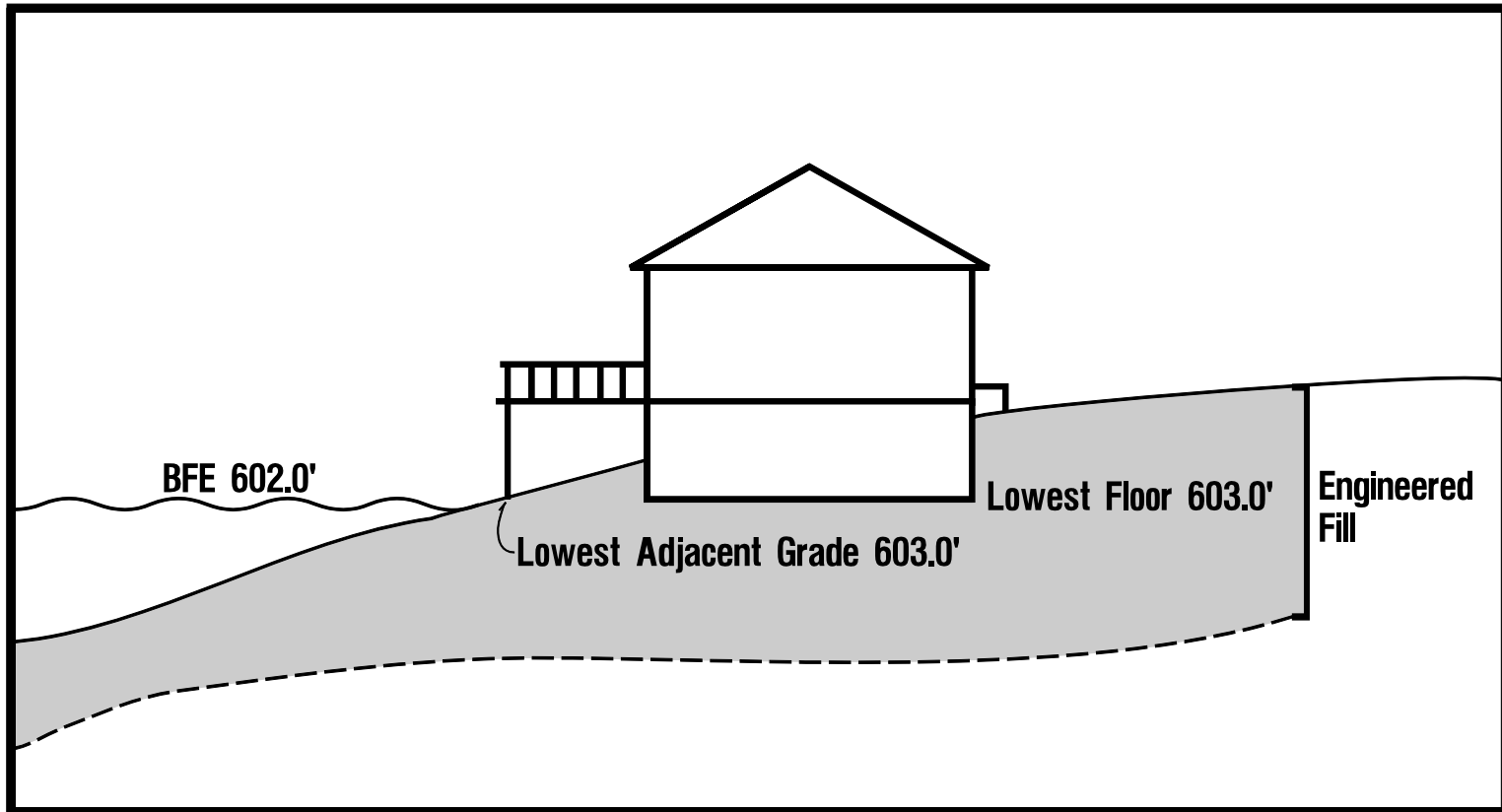
Part 70 of the NFIP regulations requires that the lowest ground touching the structure be equal to or higher than the Base Flood Elevation (BFE) for the 1%-annual-chance flood

LOMA Request: Cross-Sectional View



The Lowest Adjacent Grade (LAG) must be at or above the BFE for a LOMA request to be granted. The LAG is measured at the lowest point the ground touches the structure, including all attached structures, such as decks or garages.

LOMR-F Request: Cross-Sectional View



LOMR (Letter of Map Revision)

A letter from FEMA officially revising the current National Flood Insurance Program map to show changes to floodplains, floodways, or flood elevations

Used when there are significant changes to the flood zone or flooding characteristics (e.g. hydrology, bridges, stream channelization, retention/detention basins)

CLOMR (Conditional Letter of Map Revision)

A letter from FEMA commenting on whether a proposed project, if built as proposed, would justify a map revision (LOMR), or proposed hydrology changes

- Should be filed when a proposed project will, upon construction, affect the hydrologic or hydraulic characteristics of a flooding source.

SOMA (Summary of Map Actions)



The SOMA is a document produced by FEMA's Mapping Information Portal that describes how the previously issued Letters of Map Change (LOMCs) will be affected by the revised DFIRM.

SOMA-1

PRELIMINARY SUMMARY OF MAP ACTIONS

Community: MIAMI COUNTY Community No: 200220

To assist your community in maintaining the Flood Insurance Rate Map (FIRM), we have summarized below the effect of the enclosed revised FIRM panel(s) on previously issued Letter of Map Change (LOMC) actions (i.e., Letters of Map Revision (LOMRs), Letter of Map Revision based on Fill (LOMR-Fs), and Letters of Map Amendment (LOMAs)).

1. LOMCs Incorporated

The modifications effected by the LOMCs listed below have been reflected on the Preliminary copies of the revised FIRM panels. In addition, these LOMCs will remain in effect until the revised FIRM becomes effective.

LOMC	Case No.	Date Issued	Project Identifier	Original Panel	Current Panel
NO CASES RECORDED					

2. LOMCs Not Incorporated

The modifications effected by the LOMCs listed below are either not located on revised FIRM panels, or have not been reflected on the Preliminary copies of the revised FIRM panels because of scale limitations or because the LOMC issued had determined that the lot(s) or structure(s) involved were outside the Special Flood Hazard Area, as shown on the FIRM. These LOMCs will be revalidated free of charge 1 day after the revised FIRM becomes effective through a single revalidation letter that reaffirms the validity of the previous LOMCs.

2A. LOMCs on Revised Panels

LOMC	Case No.	Date Issued	Project Identifier	Original Panel	Current Panel
LOMA	04-07-A035A	05/06/2004	33324 WEST 355TH STREET -- PORTION OF SECTION 15, T18S, R22E	200220_27A	20121C0278D
LOMA	13-07-1120A	03/19/2013	SECTION 22, T18S, R22E -- 33480 WEST 363RD STREET	20121C0276C	20121C0278D
LOMA	20-07-0844A	05/28/2020	SECTION 16, T18S, R22E -- 33510 WEST 355TH STREET	20121C0276C	20121C0278D
LOMA	21-07-0883A	06/14/2021	SECTION 15, T18S, R22E -- 32551 WEST 355TH STREET	20121C0276C 20121C0277C	20121C0278D 20121C0277D

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Incorporated LOMCs

This means that the existing LOMC has been reflected on the new FIRM and will remain in effect until the revised FIRM becomes effective.

Not Incorporated LOMCs (Valid)

This means that the LOMC will not be reflected on the new FIRM due to scale limitations or because lot(s) or structure(s) involved in the existing LOMC are now outside of the SFHA.

Superseded LOMCs (no longer valid)

This means that the LOMC will not be reflected on the new FIRM because the new detailed flood hazard information or the information available was not sufficient to make a determination. These LOMCs will no longer be in effect when the revised FIRM becomes effective.

To Be Redetermined LOMCs

FEMA will review the data previously submitted for the LOMC and issue a new determination for the affected properties after the effective date of the revised FIRM.

SOMA Status in Miami County



LOMCs Incorporated

- None

LOMCs Not Incorporated

- 48 Cases

LOMCs Superseded

03-07-459A – Insufficient data

LOMCs to be Redetermined

- None



Goal 3

Review the appeals and map adoption process and learn about your role

Comments & Appeals

- To ensure due process, FEMA has devised procedures for local governments, organizations, and citizens to submit comments and appeals regarding the proposed flood maps
- A **90-day** comments/appeals period is initiated for the entire study area.
 - *The comments/appeals period for **Miami County & Osawatomie** begins after the Proposed Flood Hazard Determinations Notice is published in the Federal Register. It is expected to be published within the next couple of months.*
 - *The **90-Days** will begin on the second publication of a notice run in your local paper. The appeal period is estimated to occur from **March to June**.*
 - *Comments and appeals are currently being accepted and will continue to be until the end of the 90-days.*

Comments & Appeals

- Which newspaper(s) should we use to publish notice of the appeals period?
- Is the map repository information from the preliminary FIS correct?

Map Repositories

Community	Address	City	State	Zip Code
Fontana, City of	City Hall 204 East North Street	Fontana	Kansas	66026
Louisburg, City of	City Hall 5 South Peoria Street Suite 105	Louisburg	Kansas	66053
Miami County Unincorporated Areas	Miami County Administration Building 201 South Pearl Street Suite 201	Paola	Kansas	66071
Osawatomie, City of	City Hall 439 Main Street Code Enforcement Office	Osawatomie	Kansas	66064
Paola, City of	City Hall 19 East Peoria Street	Paola	Kansas	66071

Comments

- Comments are generally based on non-technical errors or oversights, or cosmetic changes to the map (e.g. corporate limits, road names, and floodplain boundaries in some instances)
- Please submit comments to Joanna Rohlf with KDA.
- Comments need to be submitted before the end of the 90-day appeal period.

Appeals

- The statutory requirement for an appeal is outlined in **44 CFR 67**
- Further guidance is provided in the **Criteria for Appeals of Flood Insurance Rate Maps**
- Appellants who contend that the flood hazard determinations (FHDs) are incorrect because better methodologies or data could have been used **must provide an** alternative analysis that incorporates such methodologies, assumptions, or data and that quantifies their effect on the FHDs
- All appeals must be submitted in writing to the community CEO for initial processing. The CEO will forward all appeals, with a written opinion, to FEMA.

When to Submit an Appeal

- Appeals about SFHA boundaries must be for those areas on your map with **new** detailed or basic studies.
 - Base Flood Elevations, base flood depths, Special Flood Hazard Zone designations
- Appeals can show:
 - Scientifically incorrect information (requires an engineering analysis), AND/OR
 - Technically incorrect information (no engineering analysis required but supporting documentation to show information is incorrect is helpful)
- Appeals involving topographic data also have technical requirements in order to be accepted

NOTE: The appendix of this presentation has more information on these qualifications.



If you are planning to submit an appeal, contact KDA and we can help you through that process!



Submit Comments To:

Joanna Rohlf

KDA Division of Water Resources
Topeka Field Office
1131 SW Winding Road, Suite 400
Topeka, KS 66615
(785) 296-7769
joanna.rohlf@ks.gov

Submit Appeals To:

Dawn Livingston

FEMA Region VII
Risk Analysis Branch
11224 Holmes Road
Kansas City, MO 64131
(816) 283-7055
Dawn.livingston@fema.dhs.gov

AD ASTRA PER ASPERA



Resolving Appeals & Comments



Appeals and comments will be resolved by the following procedures:

Written acknowledgement by FEMA of the receipt of an appeal

Acknowledge the receipt of comments

– Either in writing, or documented phone conversation

FEMA or the mapping partner will evaluate any scientific or technical data submitted

FEMA or the mapping partner will request any additional scientific or technical data required to properly review the appeal

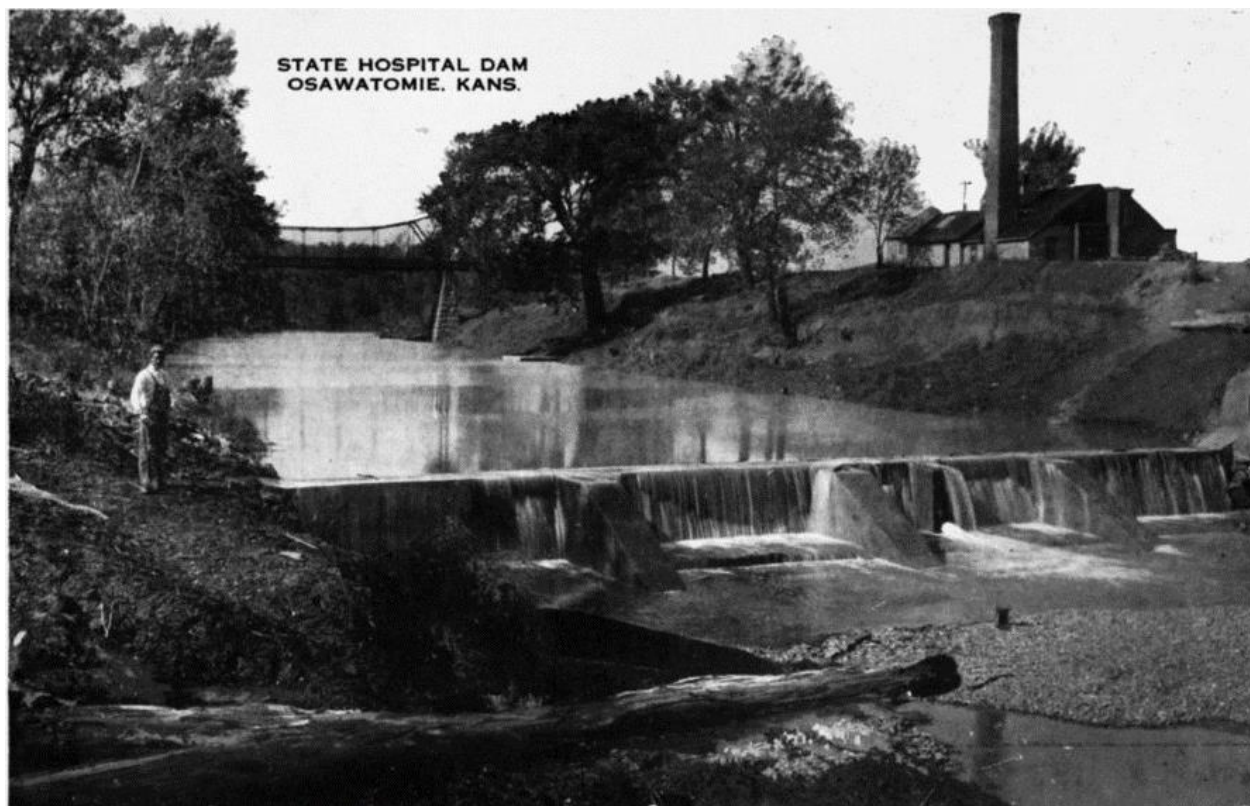
FEMA or the mapping partner will make a recommendation to FEMA on the resolution of the appeal or comment

FEMA or the mapping partner will draft an appeal resolution letter *(if all the criteria for an appeal are met)*.

A person wearing orange sneakers is walking on a blue metal staircase. The image is a close-up, low-angle shot, focusing on the person's feet and the blue railings of the stairs. The background is slightly blurred, showing more of the staircase structure.

A Critical Step

- After any appeals and comments are resolved, a Letter of Final Determination (LFD) is issued to communities indicating final BFEs and the date their new map will go into effect
- The LFD is issued 6-months before the new maps become effective
 - Miami County's estimated LFD date is **March 2024**
 - Miami County's estimated effective FIRM Date is **September 2024**



Goal 4

Discuss how you can best inform your community about changes in the new maps and the importance of flood insurance

Educating Landowners

Risk Rating 2.0 - came into effect October 1, 2021

- Ratings no longer use FEMA Flood Zone and FEMA Base Flood Elevation as the main criteria for calculating a premium.
- The FEMA floodplain maps will still determine whether flood insurance is required as a condition of a mortgage.
- New ratings use nationally available datasets based on the building's geographic and physical characteristics. Factors include; distance from and height above flood source, replacement value, building and foundation type, number of floors, first floor height and ground elevation.

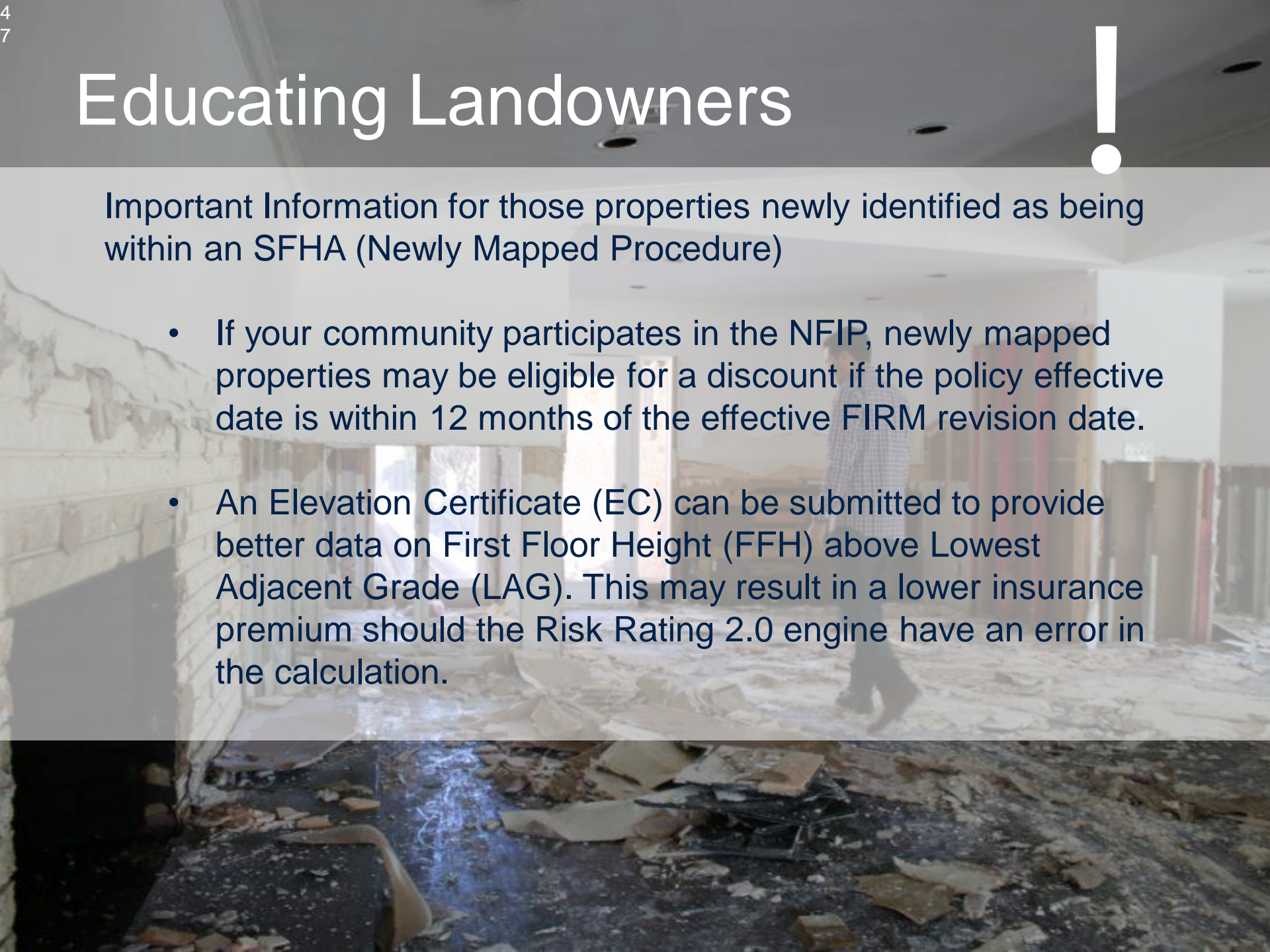
How should this information be given to the landowners in Miami County?

Educating Landowners



Important Information for those properties newly identified as being within an SFHA (Newly Mapped Procedure)

- If your community participates in the NFIP, newly mapped properties may be eligible for a discount if the policy effective date is within 12 months of the effective FIRM revision date.
- An Elevation Certificate (EC) can be submitted to provide better data on First Floor Height (FFH) above Lowest Adjacent Grade (LAG). This may result in a lower insurance premium should the Risk Rating 2.0 engine have an error in the calculation.



Educating Landowners



- There are automatic discounts to flood insurance if your community has signed up for the Community Rating System (CRS) with FEMA. CRS discounts are uniformly applied regardless of zones.
- Mitigation actions may reduce the insurance premium. Most common examples include; elevating a home, floodproofing measures, installing proper flood openings in a crawlspace, and elevating machinery/equipment.

Are there ways insurance premiums can be reduced in Miami County?

How Will You Get the Word Out?

KDA can provide information to help you inform your residents!

Things to consider:

- Social Media
- Press Releases
- Newspaper Articles / Radio Interviews
- Literature / Fact Sheets
- Signs? Mailers? Booth at the Fair?



We can assist you in informing your communities!

Map Adoption & Ordinance Questions



Tara Lanzrath

KDA Division of Water Resources
Topeka Field Office
1131 SW Winding Road, Suite 400
Topeka, KS 66615
(785) 296-2513
tara.lanzrath@ks.gov

Permit Contact Info

(785) 564-6654
KDA.WaterStructures@ks.gov

FEMA

Region VII
Map adoption & Ordinances
FEMA-R7-Floodplain@fema.dhs.gov



Questions?



Appeals

- Scientifically incorrect BFEs, base flood depths, SFHA zone designations, or regulatory floodways
- New hydrologic analysis based on alternative methodology and if applicable, updated hydraulic/floodway analyses based on the updated discharge values;
- New hydraulic/floodway analysis based on alternative methodology and proposed flood discharge values (if the appeal does not involve the hydrologic analysis);
- Explanation for superiority of alternative methodology;
- As applicable, revised Summary of Discharges Table, Flood Profiles, and Floodway Data Table; and
- Revised SFHA zone boundaries and, if applicable, regulatory floodway boundary delineations.

Appeals

- Technically Incorrect BFEs, Base Flood Depths, SFHA Zone Designations, or Regulatory Floodways
 - The methodology was not applied correctly
 - The methodology was based on insufficient or poor-quality data
 - The application of the methodology included indisputable mathematical or measurement errors.
 - The methodology did not account for the effects of natural physical changes that have occurred in the floodplain

Appeals

- Appeals to SFHA Boundaries
- Flooding sources studied by enhanced methods
 - Results in a Zone AE, AO, AH
 - Topographic data and the revised SFHA zone boundaries
 - Must reflect existing conditions
- Flooding sources studied by basic methods
 - Results in a Zone A
 - Published flood maps that are more recent or more detailed than those used by FEMA
 - Analyses that are more detailed than those performed by FEMA or that are based on more detailed data than those used by FEMA
 - Topographic data and resulting updated SFHA boundaries

Appeals

- Submittals Involving Topographic Data
- The data must be more detailed/accurate, and/or reflect more recent topographic conditions, and be in a digital Geographic Information System (GIS) format;
 - Identify the flooding sources appealed based on the updated topographic data;
 - Updated SFHA boundary delineations that reflect the submitted topographic data;
 - All topographic data submitted must adhere to FEMA's current data capture standards for such data;
 - If necessary, a data sharing agreement must be provided.
 - Certified by a Registered Professional Engineer or a Licensed Land Surveyor; or
 - Prepared by an authoritative source (USACE, USGS, State DOT)