FEMA

NATIONAL FLOOD INSURANCE PROGRAM

POTTAWATOMIE COUNTY, KANSAS (PMR)

PRELIMINARY DFIRM FINAL CONSULTATION COORDINATION OFFICER (CCO) MEETING

February 21, 2020

FEMA

Meeting Agenda

- NFIP
- Mapping Project Overview
- Determining Your Flood Risk
- Letters of Map Change
- Map Adoption Period
- Public Comment & Appeals Process
- Breakout for Questions

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Welcome & Introduction

- FEMA – Region VII
  - Teri Mayer – Risk Analysis Branch Chief
  - Andy Megrail – Regional Project Officer
  - Don Masterson – Community Coordination Officer
- Cooperating Technical Partner - CTP
  - Tara Lanzrath – Floodplain Mapping Coordinator
  - Joanna Rohlf– Floodplain Mapping Specialist
  - William Pace – Floodplain Mapping Specialist
  - Steve Samuelson – State NFIP Coordinator
- Wood. Environment & Infrastructure Solutions
  - Joe File – Senior Associate / Program Manager
  - Maria Neeland– Project Manager
  - Erika Stanley– Senior GIS Analyst

What is the NFIP?

The NFIP is a Federal program enabling property owners in participating communities to purchase insurance protection against losses from flooding.

Participation in the NFIP is voluntary based on an agreement between local communities and the federal government that states 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.

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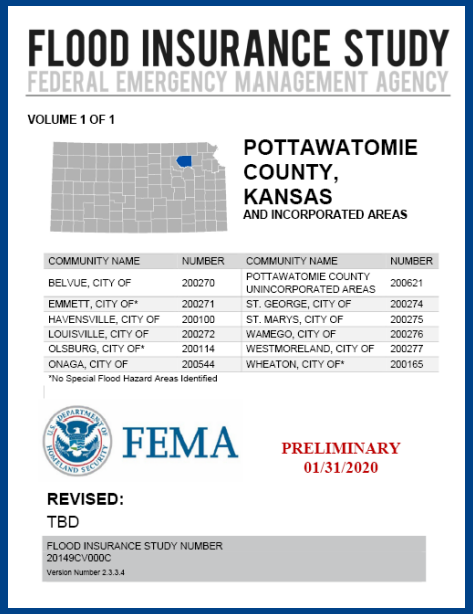
NFIP Goals

- Reduce the loss of life and property caused by flooding
- Reduce rising disaster relief costs caused by flooding
- Short range goal is to provide flood insurance
- Long range goal is encourage wise use of the floodplain

Accomplishing NFIP Goals

- Publish maps - identify risk
- Educate the public on their own risk
- Provide federally-backed flood insurance coverage
- Encourage development away from flood prone areas



FLOOD INSURANCE STUDY
FEDERAL EMERGENCY MANAGEMENT AGENCY

VOLUME 1 OF 1

POTTAWATOMIE COUNTY, KANSAS
AND INCORPORATED AREAS

COMMUNITY NAME	NUMBER	COMMUNITY NAME	NUMBER
BELVUE, CITY OF	200270	POTTAWATOMIE COUNTY UNINCORPORATED AREAS	200621
EMMETT, CITY OF*	200271	ST. GEORGE, CITY OF	200274
HAVENSVILLE, CITY OF	200100	ST. MARYS, CITY OF	200275
LOUISVILLE, CITY OF	200272	WAMEGO, CITY OF	200276
OLSBURG, CITY OF*	200114	WESTMORELAND, CITY OF	200277
ONAGA, CITY OF	200544	WHEATON, CITY OF*	200165

*No Special Flood Hazard Areas Identified

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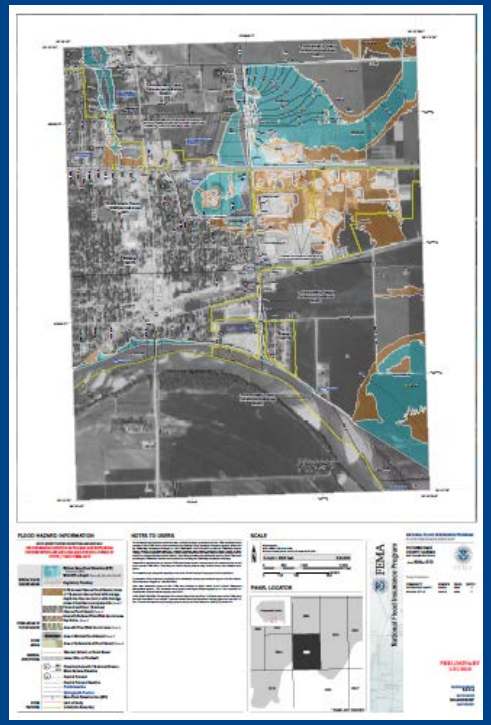
PRELIMINARY
01/31/2020

REVISED:
TBD

FLOOD INSURANCE STUDY NUMBER
20149CV000C
Version Number 2.3.3.4



Community Status

Flood Insurance Policies, by community

- City of Belvue – 0 (0 PRP) policies
- City of Louisville – Currently suspended from NFIP
- City of St. George – 4 (1 PRP) policies
- City of St. Marys – 12 (7 PRP) policies
- City of Wamego – 28 (6 PRP) policies
- Pottawatomie County – 123 (78 PRP) policies

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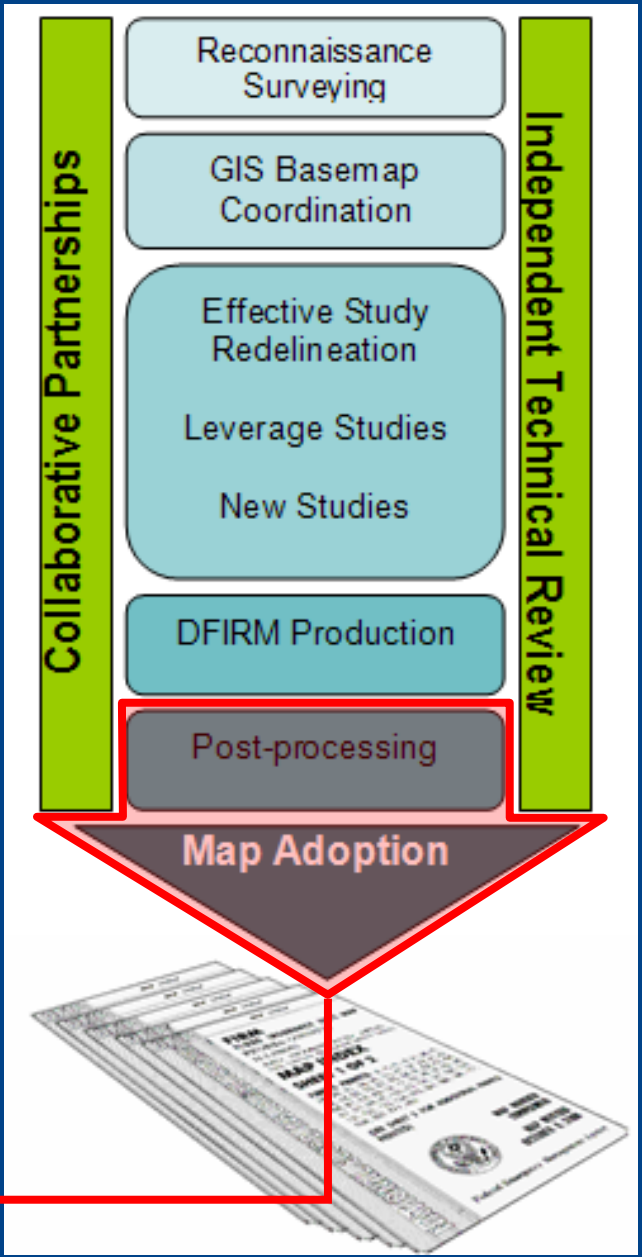
Pottawatomie County Floodplain Mapping Update

- In 2016 and 2017, the Middle Kansas Watershed was selected for Risk MAP projects
- Map updates included the City of Wamego, the Kansas River, and those areas on map panels not replaced in the 2012 Pottawatomie County FIRM Update
- New detailed Zone AE studies for:
  - East Unnamed Creek and two of its tributaries
  - College Creek
  - Willard Creek
- Zone A analysis were performed for approximately 90 stream miles

Project Tasks

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



Entering this Phase

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Background

- Project Kick-Off Meeting
  - 9/21/2016 (Phase I) & 10/24/2017 (Phase II)
- Map Production
  - 2017-2019
- Flood Study Review Meeting
  - 8/9/17 & 10/24/18
- Public Open House
  - 4/9/19
- Preliminary Map Distribution
  - 1/31/20
- Preliminary DFIRM Community Coordination Meeting
  - 2/21/20

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Determining Your Flood Risk

- Nearly everyone is at risk of flooding
- High Risk – identified Zone A or Zone AE, Special Flood Hazard Area on flood maps
- Medium Risk – Shaded Zone X areas on maps
- Low Risk – Unshaded Zone X areas on maps

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High Risk Areas – Zones AE and A

- Mandatory flood insurance requirements for federally-backed mortgages
- If your community participates in the NFIP, you are required to obtain a permit from the community. Regardless of participation you may be required to get a permit from the State DWR.
- Please visit with the State NFIP Coordinator for more information

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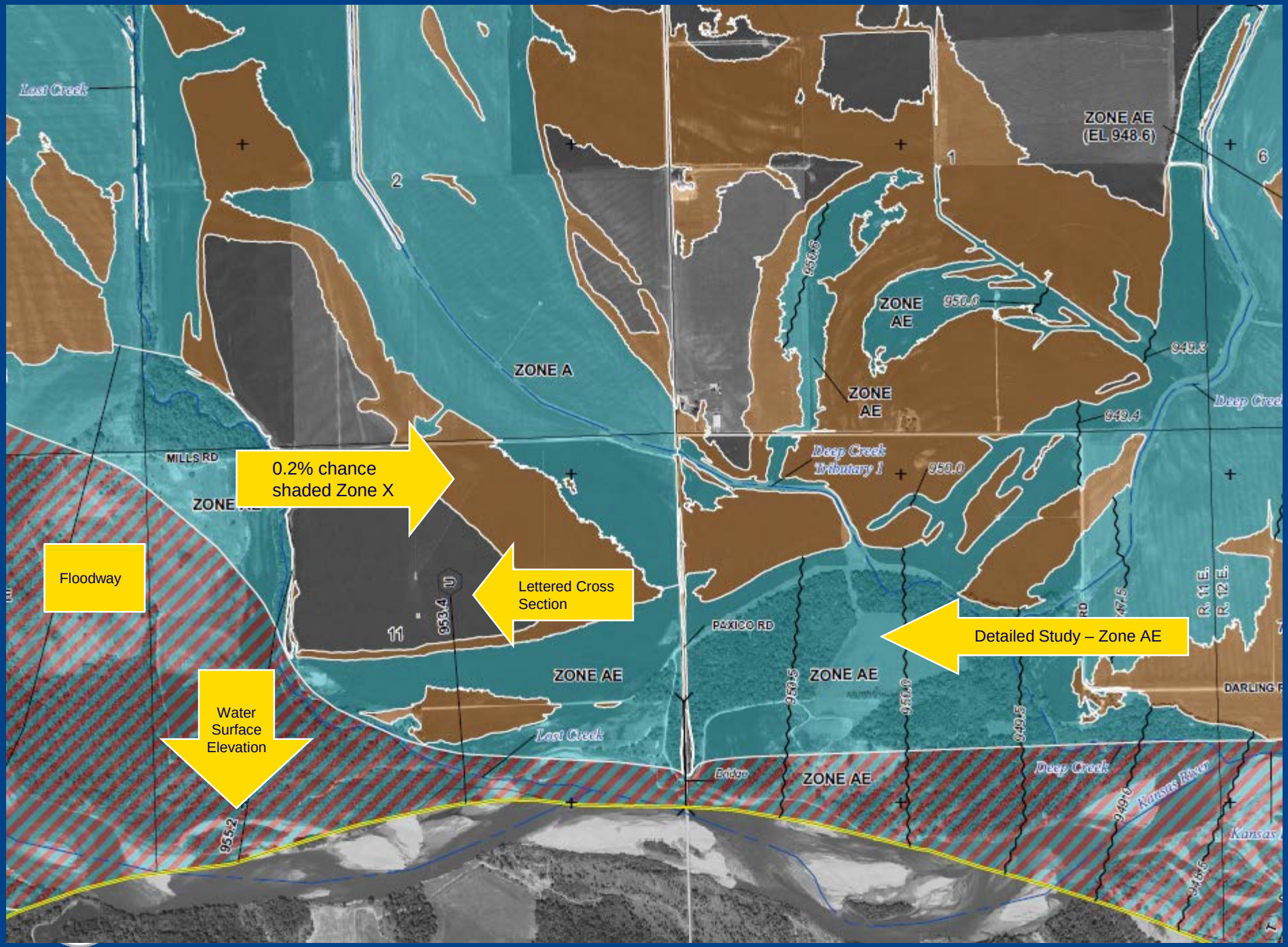
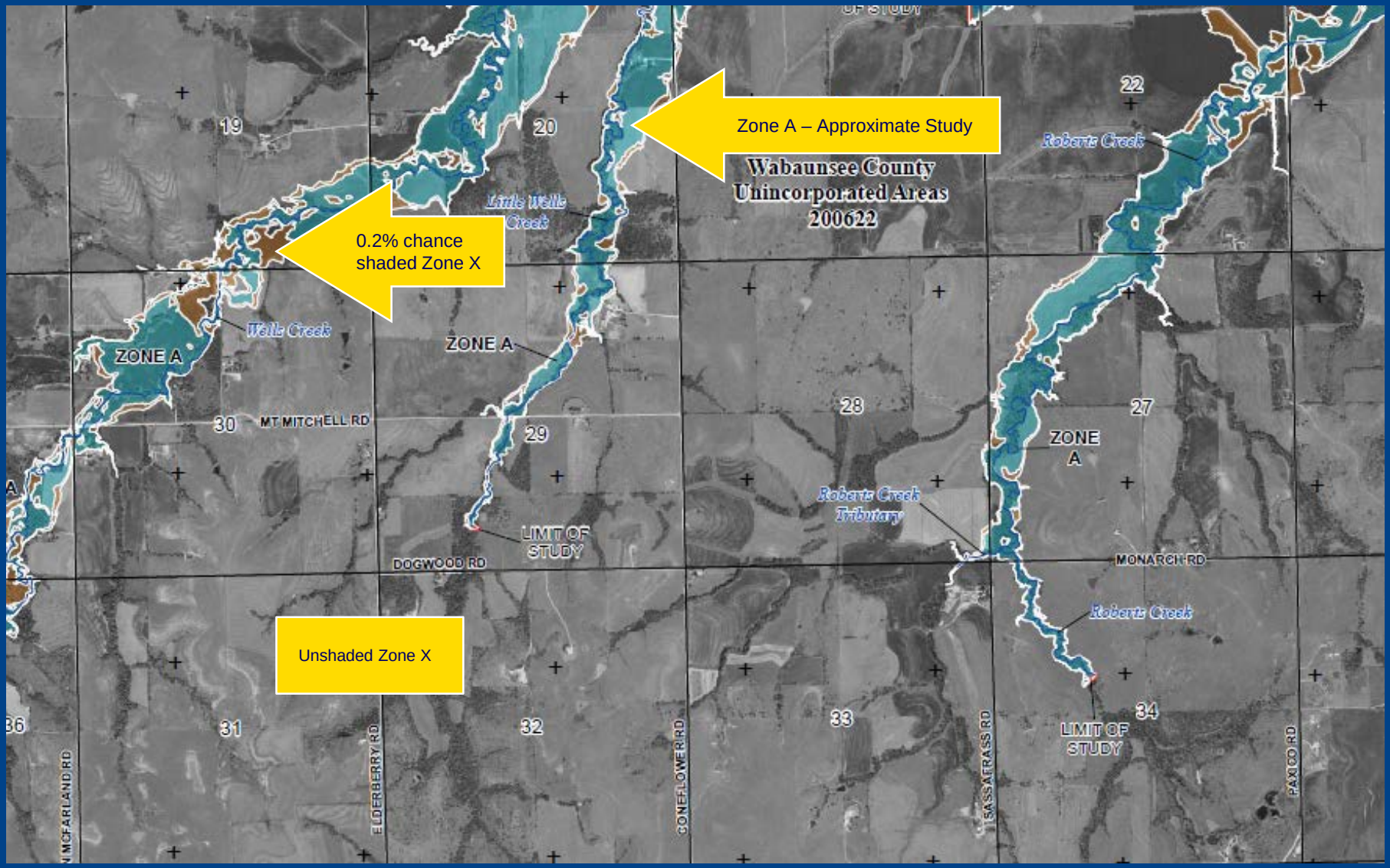
Enhanced Studies – Zone AE

- Provided for streams that were identified as having special needs during scoping
- Floodways, 1% annual chance (100-year) and 0.2% annual chance (500-year) flood zones identified
- Base Flood Elevations (BFEs) provided
  - Elevation of the 1% annual chance flood
- Detailed engineering (hydrology and hydraulics) conducted
- Floodplains delineated on best available topographic data


Lost Creek
ZONE AE
(EL 948.6)
ZONE A
ZONE
AE
950.0
949.3
949.4
Deep Creek
Deep Creek
Tributary 1
MILLS RD
0.2% chance
shaded Zone X
Floodway
Lettered Cross
Section
953.4
11
PAXICO RD
Detailed Study – Zone AE
ZONE AE
Water
Surface
Elevation
Lost Creek
Deep Creek
Kansas River
955.2
R. 11 E.
R. 12 E.
DARLING

Base Studies – Zone A

- Provided for streams that were identified as having needs during scoping
- 1% annual chance (100-year) flood zone identified
- No floodways or BFEs provided
  - Base flood approximate (BFAs) are provided to KDA
- Lesser detailed engineering (hydrology and hydraulics) conducted than in detailed studies.
- Floodplains delineated on best available topographic data


Zone A – Approximate Study
0.2% chance shaded Zone X
Unshaded Zone X
Wabaunsee County
Unincorporated Areas
200622
Little Wells Creek
Wells Creek
Roberts Creek
Roberts Creek Tributary
ZONE A
ZONE A
ZONE A
MT MITCHELL RD
DOGWOOD RD
MONARCH RD
LIMIT OF STUDY
LIMIT OF STUDY
ELDERBERRY RD
CONEFLOWER RD
SASSAFRASS RD
PAXICO RD
19
20
22
27
28
29
30
31
32
33
34

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Medium Risk Areas – Shaded Zone X

- Provided when an enhanced study has been conducted
- Indicates areas of the 0.2% annual chance (500-year) flood, areas protected by levees, areas with average depths less than 1 foot, and future 1% floodplains
- No mandatory flood insurance purchase requirements

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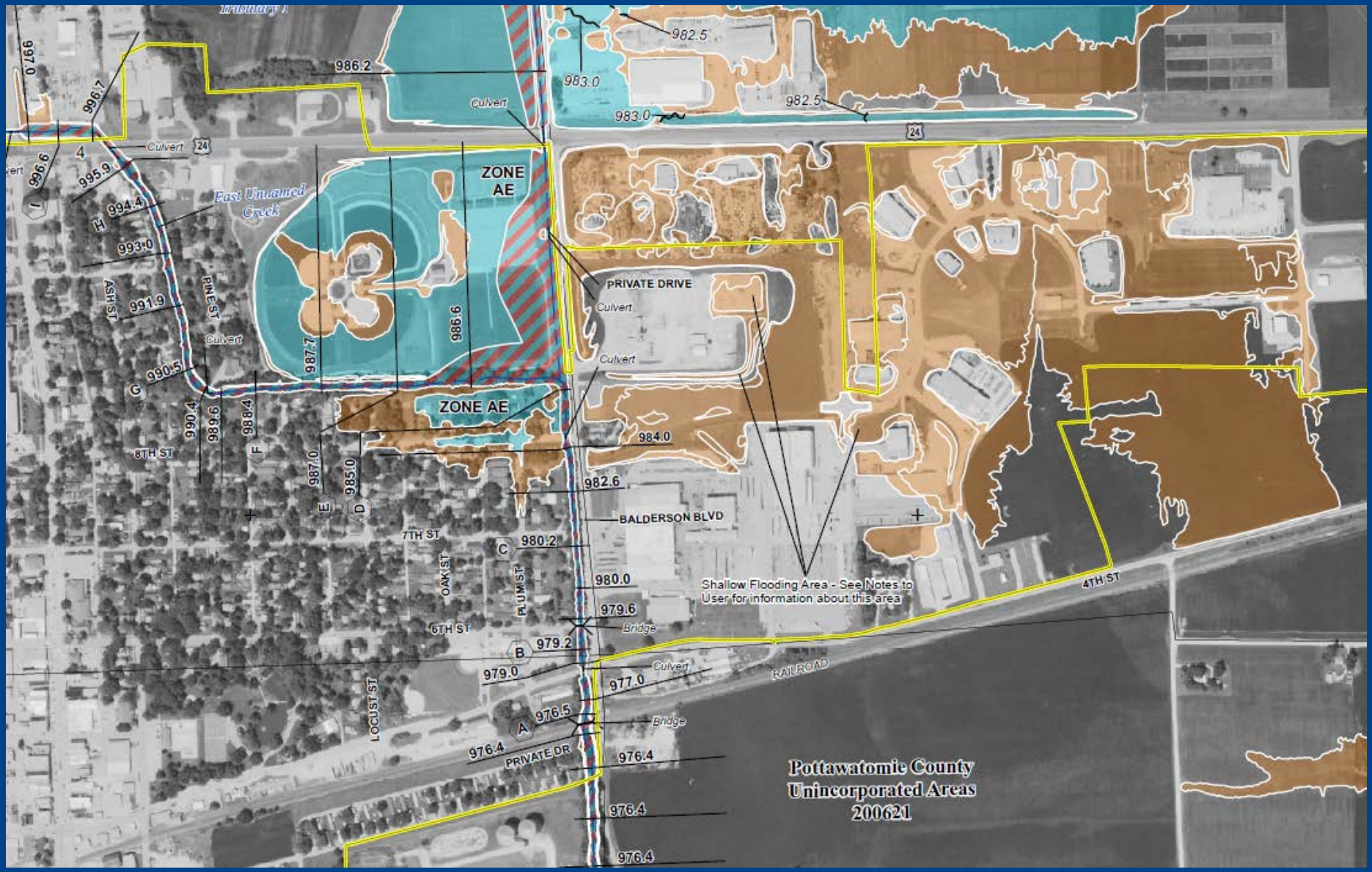

SHALLOW FLOODING: The moderate flood hazard data inside this Zone X (Shaded) area on the FIRM panel has been determined to be shallow 1-percent-annual-chance flooding where average depths are less than 1.0 foot.

Low Risk Areas – Unshaded Zone X

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

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Letters of Map Change

- Due to scale limitations on the flood maps, some areas that are identified as a flood zone may be incorrect
- In order to remedy this, FEMA has devised the Letter of Map Change process
- This process provides an administrative procedure where by FEMA will review information submitted by an owner of property who believes that his or her property has been inadvertently included in a designated flood zone

LOMA

Letter of Map Amendment

- A letter from FEMA stating that an existing structure or parcel of land that has <u>not</u> been elevated by fill would not be inundated by the 1% annual chance (100-year) flood

Letter of Map Amendment – Out As Shown

- A letter from FEMA stating that an existing structure is located outside 1% annual chance (100-year) floodplain even though the parcel of land is included

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 100-year flood

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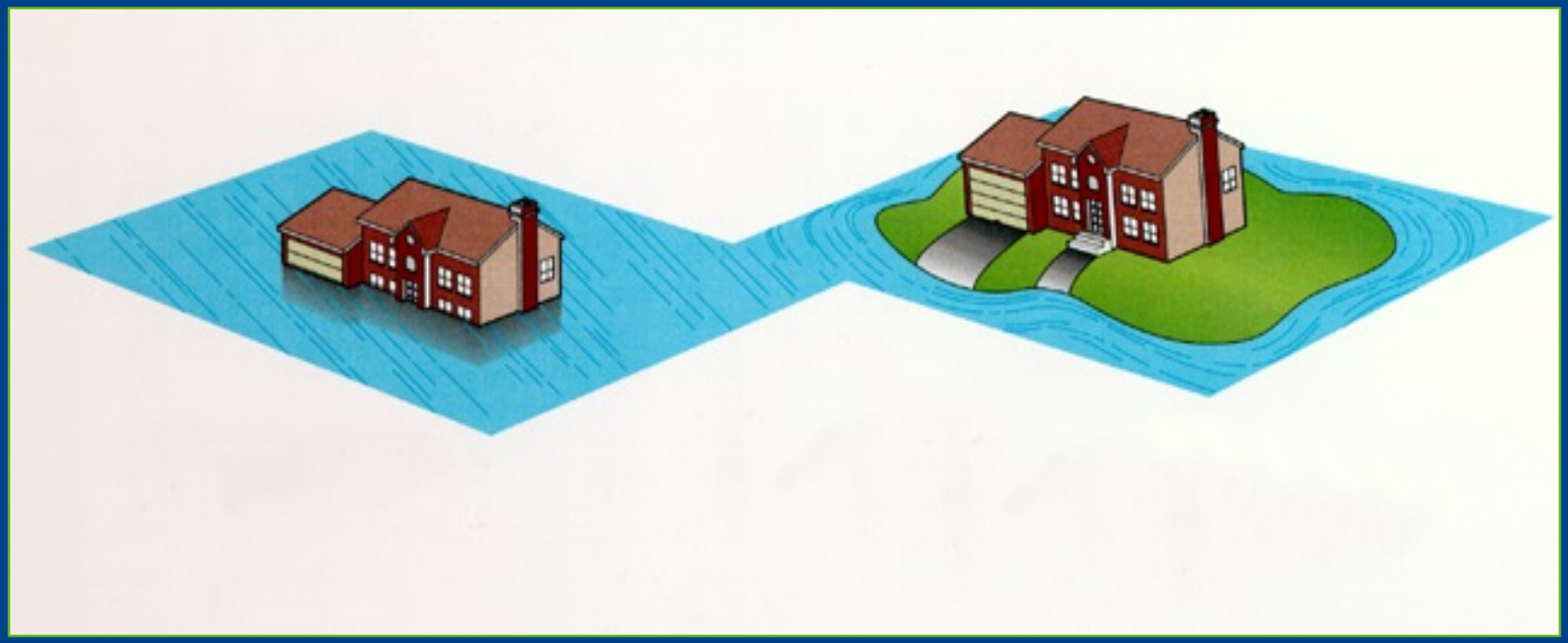
Letter of Map Amendment: Natural Ground



Part 70 of the NFIP Regulations Requires that the Lowest Ground Touching the Structure be Equal to or Higher than the Base (1% Annual Chance) Flood Elevation (BFE)

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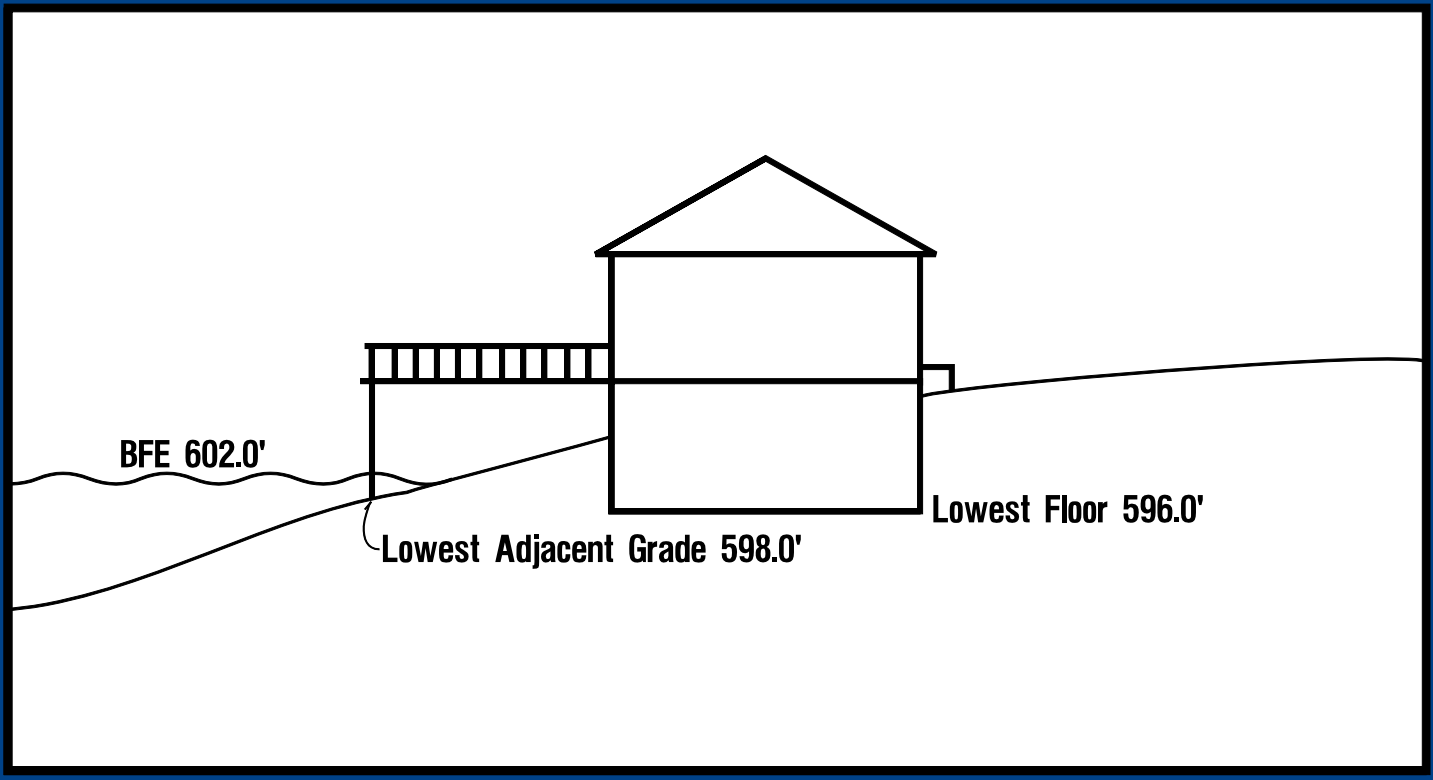
Cross Sectional View of a LOMA Request



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.

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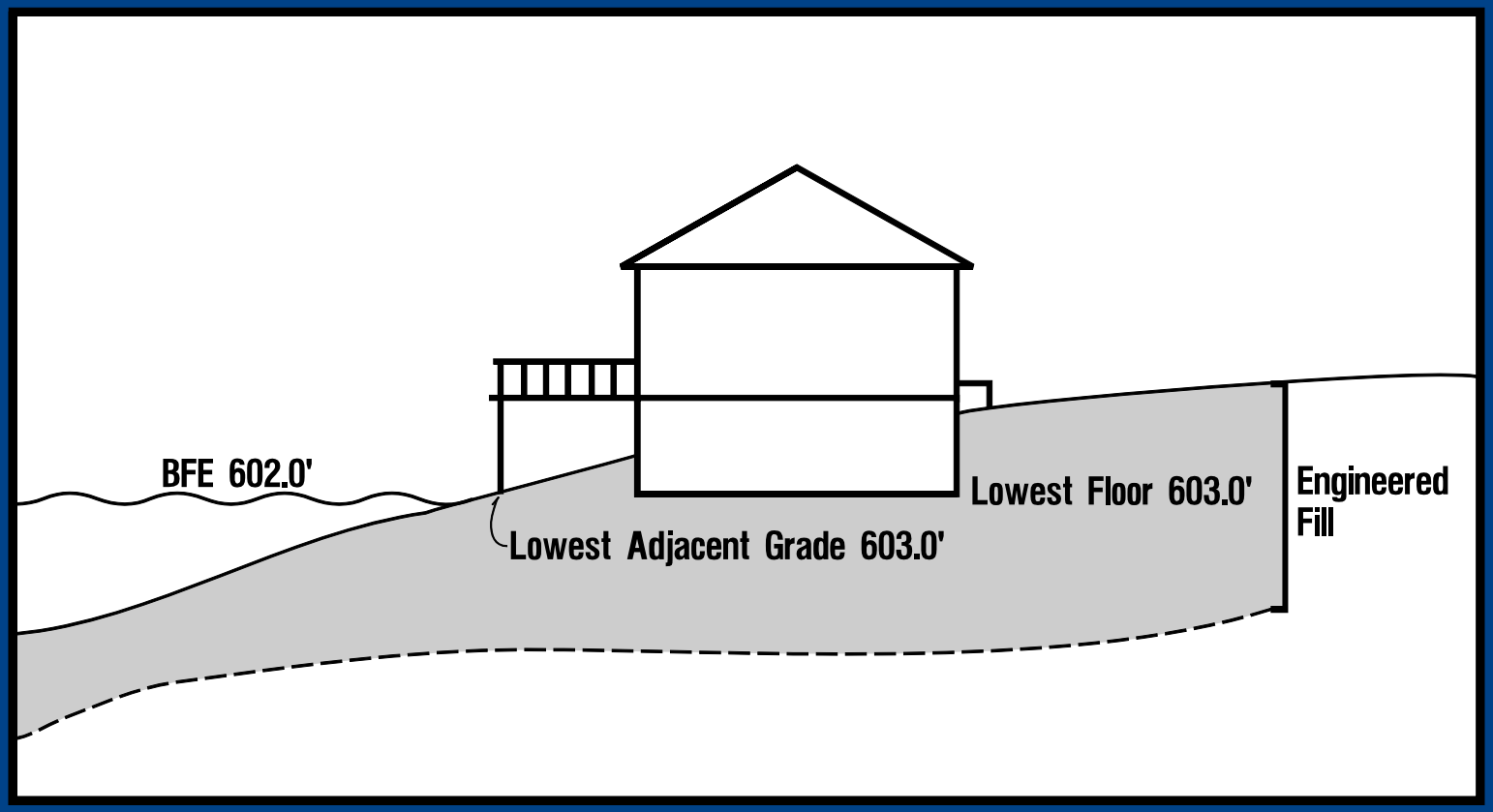
Cross-Sectional View of a LOMR-F Request



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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)

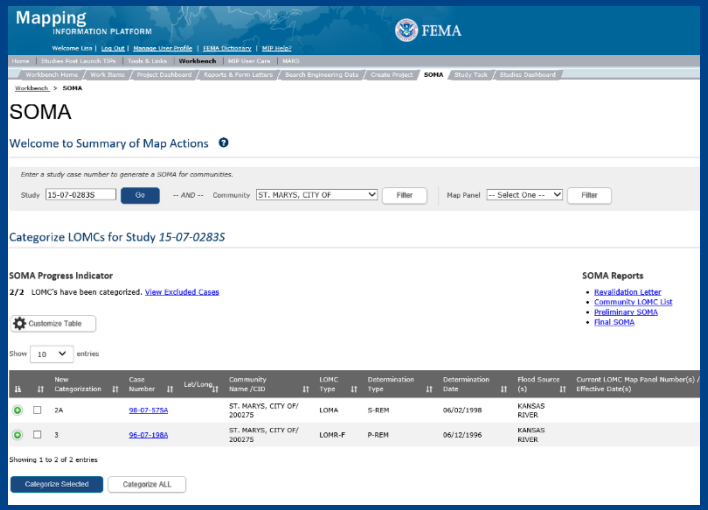
CLOMR

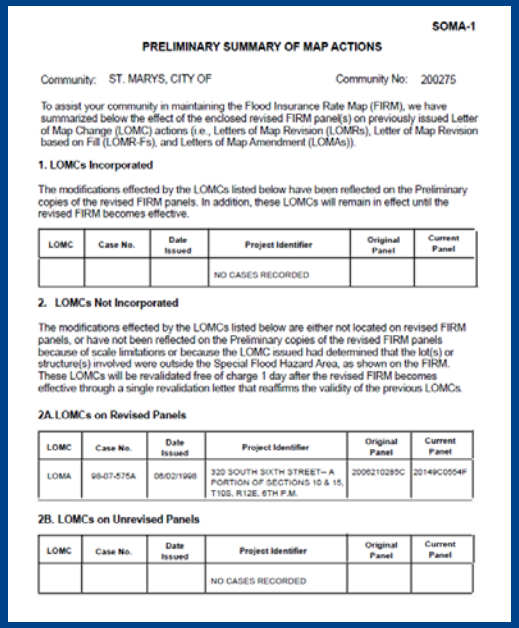
Conditional Letter of Map Revision

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

SOMA – Summary of Map Actions

- The Summary of Map Actions is a document produced by FEMA's Mapping Information Portal, which describes how the previously issued Letters of Map Change (LOMCs) will be affected by the preparation of the revised DFIRMs.
- They can be categorized in one of the following ways:
  - Incorporated
  - Not Incorporated
  - Superseded
  - Re-evaluated





SOMA-1

PRELIMINARY SUMMARY OF MAP ACTIONS

Community: ST. MARYS, CITY OF Community No: 200275

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	98-07-575A	06/02/1998	320 SOUTH SIXTH STREET– A PORTION OF SECTIONS 10 & 15, T10S, R12E, 6TH P.M.	2006210285C	20149C0554F

2B. LOMCs on Unrevised Panels

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

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SOMA – Summary of Map Actions (cont)

- Incorporated LOMCs
  - This means that the LOMC has been reflected in the new panels and will remain in effect until the revised FIRM becomes effective.
- Not Incorporated LOMCs (valid)
  - This means that the LOMC has not been reflected in the new panels due to scale limitations or because the LOMC issued had lot (s) or structure (s) involved were outside the Special Flood Hazard Area.
- Superseded LOMCs (no longer valid)
  - This means that the LOMC has not been reflected in the new panels 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.
    - Reasons to supersede include:
      - Insufficient information available to make a determination
      - Lowest adjacent Grade and Lowest Finished Floor are below the proposed Base Flood Elevation
      - Lowest Ground Elevation is below the proposed Base Flood Elevation
      - Revised Hydrologic and Hydraulic analyses
      - Revised topographic information
- To Be Redetermined LOMCs
  - FEMA will review the date previously submitted for the LOMC and issue a new determination for the affected properties after the effective date of the revised FIRM.

Community SOMA Status

- LOMCs Incorporated
  - None
- LOMCs Not Incorporated
  - Louisville – 1
  - St. George – 1 on unrevised panel
  - St. Marys – 1
  - Wamego - 23
  - Pottawatomie County – 7- on revised panels, 31 on unrevised
- LOMCs Superseded
  - St. Marys – 1
  - Wamego– 1
  - Pottawatomie County-1
- LOMCs To Be Redetermined
  - None

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Comments & Appeals

- In order to ensure due process FEMA has devised procedures for local governments, organizations, and citizens to submit comments and appeals to the proposed flood maps
- A 90-day comments/appeals period is initiated for the entire study area.
  - The comments/appeals period for Pottawatomie County & Incorporated Areas begins after the Proposed Flood Hazard Determinations Notice is published in the Federal Register. It is expected to publish within the next couple of weeks.
  - The 90-Days will begin on the second publication of a notice ran in your local paper. The appeal period is estimated to occur from June 2020 to August 2020.
  - Comments and appeals are currently being accepted and will continue to be until the end of the 90-days.

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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 FHDs are incorrect because better methodologies or data could have been used must provide alternative analysis that incorporate such methodologies, assumptions, or data and that quantify 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.

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

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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)

Comments

- Comments are generally based on non-technical errors or oversights, or cosmetic changes to the map (e.g. corporate limits, stream and road names, and floodplain boundaries in some instances)
- If a person or entity has a problem with any of these aspects of the revised maps, they must submit in writing, their comment to the community CEO
- The community CEO will forward all comments to KDA. They must by submitted within the 90-day appeal period.

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
  - 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).

The Final Step

- Upon resolution of appeals and comments, 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 prior to the new maps going effective
  - Pottawatomie County's estimated LFD Date is December 2020
  - Pottawatomie County's estimated Effective June 2021

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Community Outreach

- Newly Mapped Procedure
  - Landowners that are newly mapped in the floodplain can utilize their current flood zone for rating insurance.
  - Insurance rates will rise annually until full actuarial rates are reached
    - This will take several years
    - This will save people money
  - Landowners that are newly mapped in the floodplain must purchase flood insurance before the map's effective date or within 12 months of the map's effective date.
  - How should this information be given to the landowners in Pottawatomie County?

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Community Outreach

- Preferred Risk Policy (PRP)
  - Flood insurance for structures outside the Special Flood Hazard Area (SFHA)
    - (So properties not in the mapped floodplain)
  - Much cheaper than flood insurance in high risk zones (A, AE, AH, AO)
  - There are only 12 PRPs in the communities in this update, but larger floods than the mapped floodplain do occur
  - How do we inform people about risk outside the mapped floodplain and Preferred Risk Policies?

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Community Outreach

- Risk MAP Outreach Campaign
  - KDA will help provide information to the public in cooperation with Pottawatomie County communities
  - Outreach campaign can start at LFD and continue past the effective date
    - Press Releases
    - Newspaper Articles / Radio Interviews
    - Literature / Fact Sheets
    - Signs? Mailers? Booth at the Fair?
  - We can assist you in executing outreach to your communities

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Submit Comments To:

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

Submit Appeals To:

Andy Megrail

FEMA Region VII

Risk Analysis Branch

11224 Holmes Road

Kansas City, MO 64131

(816) 283-7982

Andy Megrail@fema.dhs.gov

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Map Adoption & Ordinance Questions

Steve Samuelson

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Questions?