

FEMA Flood Insurance Rate Maps (FIRMS) aka “Flood Maps” Some Questions and Answers relevant to Brentwood Bound

Q1 – Why does FEMA update flood maps?

A1 – FEMA knows flood risk is always changing and has an ongoing effort to provide communities with the best available data to use in managing and mitigating flood risk.

Q2 – Why is St. Louis County getting new flood maps now?

A2 – Although FEMA is supposed to update flood maps every 5 years it can often take longer as scheduling depends on various factors, and largely on receipt of federal funding. St. Louis County flood maps were last updated in 2015, and that was a limited, rather than complete update. The modeling and other information used was decades old even then.

Q3 – How is SEMA-MO involved in the flood map updates for St. Louis County?

A3 – FEMA created its Cooperating Technical Partners Program (CTP) in 1999 to help stretch limited mapping resources by leveraging nonfederal government involvement. SEMA-MO is a CTP for FEMA flood mapping and is leading the map update effort.

Q4 - Will these new FEMA Flood Insurance Rate Maps (FIRMs) be used to set flood insurance premiums under the FEMA National Flood Insurance Program (NFIP)?

A4 – No. FEMA has established a new pricing approach for calculating NFIP premiums (aka Risk Rating 2.0) that no longer uses the data reflected on the flood maps.

Q5 – If not for setting insurance rates, why continue to update these flood maps?

A5 – Flood maps will continue to be used to define regulatory boundaries for floodplain management as well as identify the Special Flood Hazard Area (SFHA) for which the requirement to have flood insurance for any federally backed loan is applied.

Q6 – How does FEMA define and determine the SFHA?

A6 - FEMA maps and regulates the area that will be inundated by the flood event having a 1-percent chance of being equaled or exceeded in any given year. The 1-percent annual chance flood is also referred to as the base flood or 100-year flood. The SFHA is also referred to as the 100-year floodplain or the regulated/regulatory floodplain. Areas within the SFHA are designated on the flood insurance rate map as Zone A, AO, A1-A30, AE, A99, AH, AR, AR/A, AR/AE, AR/AH, AR/AO, AR/A1-A30, V1-V30 or V. When the area is identified as an AE Zone the area is in the SFHA and the 100-year (aka base flood elevation (BFE)) has been determined.

Q7 – When do these newly issued Preliminary Flood Maps become official?

A7 – The Preliminary Flood Maps are the first look at the updated flood maps, after which there are meetings, a 90-day appeal and comment period, resolution and map revisions if warranted. It typically takes 18-24 months to finalize the preliminary maps after they are released, but it can take longer. After the maps are finalized by FEMA they must then be adopted by the participating NFIP community.

Q8- Who can appeal a Preliminary Flood Map when it is released?

A8 – Communities, residents, business owners, developers or others who disagree with how they are affected can appeal by submitting data showing the proposed information to be scientifically or technically incorrect—flood history is not enough for an appeal.

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Q9 – Other than FEMA’s update and issuance of new flood maps, how might changes to flood risk be incorporated into the flood maps used by communities?

A9 – Flood maps can be updated at any time due to natural or development related changes that result in a change to the existing base (100-year) flood elevations (aka BFEs), floodways or SFHAs. The Letter of Map Revision (LOMR) is FEMA’s official modification to a current effective flood map (often resulting from a specific project) and is primarily intended for small areas of change where flood hazards are typically decreasing. A Physical Map Revision (PMR) can be used when there are large areas of change to the flood maps.

Q10 – What is a CLOMR?

A10 – The Conditional Letter of Map Revision (CLOMR) shows what the flood elevations and boundaries on flood maps would be if a particular project were constructed as designed AND no other conditions changed. Upon project completion a request for a LOMR is required and used to officially change the flood map. If conditions have not changed the LOMR and CLOMR will be the same. However, when conditions do change, whether natural or due to development, the CLOMR can no longer be relied upon to accurately represent what the flood elevations and boundaries are at the time of project completion. Hence, those must be recalculated using up-to-date information.

Q11 – What are some examples of changed conditions that impact flood maps?

A11 – Development that significantly changes land use, such as replacing a densely forested area with impervious surfaces like pavement or new buildings, can result in changes to how much surface water runoff flows to a creek rather than seeps into the land. It can also impact how long it takes runoff to get to the creek, which can increase the peak flow for the 100-year flood and its elevation. Natural changes might occur to flow amounts just from having a longer period of record to analyze or perhaps due to other causes such as an increasingly arid or wet climate.

Q12 – Why use a LOMR rather than waiting for a regularly scheduled map update?

A12 – The LOMR process allows for updating a specific location without affecting other areas and can proceed independently without impacting the schedule for a flood map update or other revision. The LOMR process is the timeliest means for allowing the community to quickly incorporate valuable revisions to flood hazard information. Also, when a CLOMR has been approved a LOMR request is required to be submitted once the project has been completed.

Q13 – Do FEMA maps accurately depict where flooding will occur?

A13 – FEMA only maps the 100-year floodplain with a 50th percentile confidence level, so there is a 50% chance that a 100-year flood will fall within the line drawn on the map. FEMA’s Technical Mapping Advisory Council is recommending a 95% confidence level be used in the future for mapping purposes.