



## **MAPPS Comments to the Department of Housing and Urban Development (HUD)**

[\[Docket No. FR-5717-P-01\]](#)

[RIN 2501-AD62](#); HUD-2016-0124

*Floodplain Management and Protection of Wetlands; Minimum Property Standards for Flood Hazard Exposure; Building to the Federal Flood Risk Management Standard*

Formed in 1982, MAPPS ([www.mapps.org](http://www.mapps.org)) is the only national association exclusively comprised of private sector firms in the remote sensing, spatial data and geographic information systems field in the United States. The MAPPS membership spans the entire spectrum of the geospatial community, including Member Firms engaged in satellite and airborne remote sensing, surveying, photogrammetry, aerial photography, LIDAR, hydrography, bathymetry, charting, aerial and satellite image processing, GPS, and GIS data collection and conversion services. MAPPS also includes Associate Member Firms, which are companies that provide hardware, software, products and services to the geospatial profession in the United States and other firms from around the world. Independent Consultant Members are sole proprietors engaged in consulting in or to the geospatial profession, or provides a consulting service of interest to the geospatial profession. MAPPS provides its member firms opportunities for networking and developing business-to-business relationships, information sharing, education, public policy advocacy, market growth, and professional development and image enhancement.

The federal government's National Flood Insurance Program (NFIP) is at least \$24 billion in debt to U.S. taxpayers. These losses are in part due to inadequate mapping data, and result in frequent flooding or unwise construction. Current, accurate elevation and structure data, and better use of surveying technology, would help bring fairness, loss prevention and lower costs to NFIP. Fortunately to help address this problem in a coordinated process, FEMA and several other Federal agencies are working closely to collect enhanced elevation data nationwide via the U.S. Geological Survey (USGS)'s [3D Elevation Program](#), commonly known as [3DEP](#).

Flood maps identify areas at greatest risk of flooding and provide the foundation for NFIP. Accurate geospatial information is essential to all aspects of flood insurance risk assessment and emergency management (preparedness, prevention, protection, detection, response, recovery). Imagery, map data and other geospatial assets are of most critical value in emergency response during the initial hours and days immediately before and following a hurricane, flood or other disaster. These data can be an effective, efficient and life-saving tool. In addition, accurate

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geospatial data facilitates the engineering data development to perform risk identification and risk assessment.

### **MAPPS Recommendations for HUD:**

HUD should further improve the nation's flood insurance program, protect homeowners, help reduce the taxpayers' financial risk, and recognize that national elevation data is necessary for HUD to implement the 2 and 3 foot above requirement, by implementing a number of surveying and mapping (geospatial) reforms regarding "Data Sources", relative to base flood elevation and best information available. MAPPS recommends that HUD:

1. Establish a priority to rely on, and partially fund, the enhanced elevation data from the USGS 3D Elevation Program ([3DEP](#)), and in close consultation with the Federal Emergency Management Agency (FEMA), in assessing current sustainability efforts, and evaluating alterations to current policies to enhance resiliency goals. Given that elevation data from USGS for flood maps is on average 35 years old, the USGS 3D Elevation program ([3DEP](#)) should be designated as the inter-agency, intergovernmental funding pool to collect and maintain elevation data for flood maps and a variety of other national priority applications. Funding at \$147 million per year will enable USGS, FEMA and other cooperators, such as HUD, to keep elevation map data current on an 8-year repeat cycle. Section 100220 of the Biggert-Waters Act ([P.L. 112-141](#)) authorized a crosscut for the proposed budgets of federal agencies working on flood risk determination and digital elevation models, including interagency transfers. Recommendation 14 of a [NAPA report](#) called for the Office of Management and Budget, in consultation with FEMA and its partner agencies (and in this case HUD), should work to refine the initial budget crosscut so it can be used to identify and communicate opportunities for improved funding coordination;
2. Take the lead in creating a National Structure Inventory to aid and benefit FEMA, first responders and other related agencies providing reliable, accurate data to streamline structure, infrastructure and safety assessments, including response and recovery time, as well as accurate pre and post disaster structure risk assessment and assessment values; simplify the sale, rating and processing of flood insurance; and create a cost effective, efficient and accurate structure and infrastructure inventory providing our nation a single platform of flood mapping assessments and inventory; and
3. Include address and parcel data to permit the association of actual address information with structure/parcel information in flood insurance processing and emergency response; to enhance data available for insurance rating; and to permit first responders' access to data for life saving activities in a declared emergency. This may include obtaining parcel or address data that is privately available, or the [National Address Database](#) being developed by the Census Bureau and U.S. Department of Transportation.