



June 26, 2020

Talking Points on the First Street Foundation Flood Risk Model

This product provides aggregated, generalized data. The analysis is based on a nationwide 30-meter Digital Elevation Model, which is more coarse than the elevation data on a 7½ minute USGS Quad. The analysis does not model roads and hydraulic structures like bridges, culverts and dams. We are also concerned about the extent of the process and the reviewers used to validate the model.

The initial information available appears to over promise on the accuracy and appropriate use of large national data sets and models that appear to have been downscaled for use at the parcel level. It may lead property owners to believe that this can be a one-stop source for all flooding risk associated with a parcel and lead to more confusion as it promises to provide a “max depth of flood water reaching the building or the center of an empty lot.”

The available pre-release information does not stress the continued need for FEMA produced floodplain maps for regulatory purposes. This type of big data is most appropriately used for informational or awareness purposes and we caution that it should not be used as the sole source for specific risk management decisions at the parcel level. The product must be aligned with appropriate uses in order to set reasonable expectations.

This tool and data may be useful in making broad management or planning decisions or inform risk in a non-consequential manner and could be complementary to the FEMA maps. The potential uses include:

- Risk awareness
 - Awareness by property owners, home buyers, etc. of past, current and potential future flood risk on the parcel.
 - Bringing awareness to the gap in current FEMA mapping, especially in smaller communities and rural areas. Remember, FEMA has only mapped a third of the nation’s riverine and coastal floodplains. It reinforces the argument ASFPM has been making for several years that we need to complete the initial job of mapping the nation – and that means Congress needs to provide an appropriate level of funding to get that done. ASFPM has quantified the cost of “getting the job done” in this

January's update of the [ASFPM Flood Mapping for the Nation report](#). ASFPM is especially concerned that policy makers could be confused by the availability and presumed lower cost of this national dataset/model and ask the question, why do we need FEMA flood maps. It is comparing apples and oranges – this new tool may be very good at raising awareness of potential flood risk but cannot and should not be thought of as a replacement for the more detailed and precise FEMA flood maps.

- Planning
 - prioritization of areas for future mapping needs
 - identifying of hazard mitigation opportunities
 - conducting emergency response planning and actions
- General risk identification
 - areas not mapped by FEMA
 - urban areas subject to intense rainfall flooding (urban flooding)
 - flood risk information source potential for property purchasers
 - insurance rating when combined with validated structure information

It seems it would not be appropriate for regulatory decisions that need to be based on flood map information that has been vetted and gone through due process, such as:

- In/out determinations for mandatory insurance and zoning decisions
- Setting a Base Flood Elevation (BFE) for permitting development
- Providing data for Letters of Map Change (LOMC)

At this point we are still discovering potential points of concern, conflict and advantages of this data. For example, if you are a state or local floodplain manager, you may wish to coordinate with determination companies, lenders, insurance, and realtors in your area to emphasize that they will see clients who will attempt to leverage these products should they provide a more favorable flood insurance story. If you have questions or additional feedback, please contact ASFPM staff Meg Galloway (Meg@floods.org) or Alan Lulloff (Alan@flood.org). This will help us fine-tune future messaging on the tool.