



**NEW YORK STATE
FLOODPLAIN AND STORMWATER MANAGERS ASSOCIATION**

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January 15, 2009

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Mr. Michael Buckley
Acting Assistant Administrator
FEMA Mitigation Division
500 C Street SW
Washington, DC 20472

RE: Paper Flood Insurance Rate Maps

Dear Mr. Buckley:

The New York State Floodplain and Stormwater Managers Association (NYSFSMA) is a statewide organization of floodplain and stormwater management professionals in New York. We would like to express our concern about the proposal to nearly eliminate publication of paper Flood Insurance Rate Maps. We applaud the Agency's development of DFIRMs, which are extremely useful floodplain mapping products. However, we feel that the digital maps should not be expected to completely replace paper maps, particularly for small municipalities.

In New York, Cities, Towns, and Villages are responsible for floodplain management and other land use functions. Some of these Towns and Villages have only a few hundred residents, and thus have extremely limited financial resources. In fact, of the 1,542 municipal governments in New York State, 1,153 have fewer than 5,000 residents. These small municipalities often lack both the technology and the sophistication needed to fully utilize the digital floodplain mapping products. They are comfortable with the use of paper products that can be stored in a folder, taken into the field, or posted on the wall. Understanding and enforcing NFIP floodplain management standards is already a challenge for small municipalities, in which the building official may wear many hats. If they are asked to use mapping products with which they are not comfortable, we fear that their ability to effectively manage floodplain risks will be further diminished.

Although we fully support the development and utilization of digital floodplain mapping products, we ask that you also continue to publish paper maps for those users who request them. I expect that there would still be significant cost savings, since communities and organizations with the capability of using digital products will prefer them. However, we ask that FEMA continue to print paper products for those users who request them.

Thank you for your consideration of this request. If I can provide additional information or assistance, please contact me at 607-737-5271 or jthigpen@co.chemung.ny.us.

Sincerely,

A handwritten signature in cursive script that reads "Janet Thigpen".

Janet Thigpen
Chair

Cc: Stephen Kempf, Jr., Regional Director, FEMA Region II
Douglas A. Bellomo, P.E., Director, FEMA Risk Analysis Division
William Nechamen, Floodplain Management Section, NYS DEC
Association of State Floodplain Managers