

FEMA Risk Insurance Division Response to Comments, Docket ID FEMA-2014-0034
FEMA Form 036-0-32 (the Standard Flood Hazard Determination Form)

Association of State Floodplain Managers (ASFPM) Comments

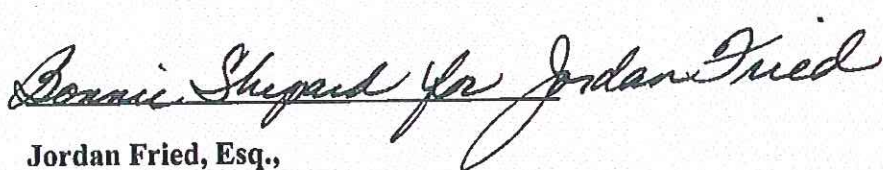
Written comments were received on Docket ID FEMA-2014-0034, renewal of the Standard Flood Hazard Determination Form (SFHDF) collection. Comments were submitted by Mr. Bill Nechamen, CFM. Mr. Nechamen recommends that FEMA return to the previous one-page form with additional instructions pages

FEMA Response to Comments by ASFPM

In response to the concerns raised by the ASFPM and other users of the form, the Agency will return the form to a single page with the instructions preceding the form. This format (Instructions first, followed by the form) will allow the various Paperwork Burden and Privacy Act Statements to be updated as required by OMB and DHS while keeping the form at one-page.

For further information please contact: Susan Bernstein, Program Analyst, FEMA, Federal Insurance and Mitigation Administration (FIMA), 202-212-2113.

Dated:

 2/18/15

Jordan Fried, Esq.,

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Federal Emergency Management Agency,

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February 16, 2015

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Re: Federal Emergency Management Agency, Docket ID FEMA-2014-0034; OMB No. 1660-0040;
Proposed Collection; Comment Request; Standard Flood Hazard Determination Form

Dear Madam or Sir:

On December 11, 2014, the Federal Emergency Management Agency (FEMA) issued a Proposed Collection and Comment Request notice within the *Federal Register* requesting public comment on the information collection and estimated burden related to the proposed new version of the Standard Flood Hazard Determination Form (the "Form", FEMA Form 086-0-32). The Association of State Floodplain Managers (ASFPM) appreciates the opportunity to share our comments on the proposed changes to the Form.

ASFPM is an organization of professionals involved in floodplain management, flood hazard mitigation, National Flood Insurance Program, and flood preparedness, warning and recovery. ASFPM is a respected voice in floodplain management practice and policy in the United States because it represents flood hazard specialists of local, state and federal government, research community, insurance and flood hazard determination industries, and the fields of engineering, hydrologic forecasting, emergency response, water resources and others.

Specific Recommendations

In reviewing the updated form, many of the recommended change are more formatting than truly content changes. These have been listed on Attachment A which is attached to this letter. The one main recommendation that ASFPM would like to strongly make is to keep the Form to one page. The Form has always been one page since its initial release and the "Comments" section on that page. As stated by FEMA in its Notice, the FORM may be utilized over 45 million times each year. By adding an extra page for the comments will significantly increase the burden and the cost, and as importantly be a significant needless waste of paper.

Dedicated to reducing flood risk and losses in the nation.

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Association of State Floodplain Managers, Inc.

To achieve a one-page form, FEMA should explore moving the Paperwork Burden Disclosure Notice back to the top of the instructions page, since it is a part of the instructions and not germane to the Form itself. Other areas where space may be saved include reformatting Section II B (especial #3) as well a Section II C. With these changes, we strongly urge FEMA to create and place on FEMA's website a version of the Form that includes a single-page Form along with accompanying instructions.

Conclusion

As described above, ASFPM's biggest concern is that the Form becomes longer than one-page in length and urge FEMA to keep it to one page. Meanwhile, ASFPM thanks FEMA for the opportunity to submit these comments and recommendations and would welcome any continuing dialogue with FEMA or other respondents.

Thank you for the opportunity to comment. Please contact Chad Berginnis, CFM, Executive Director at cberginnis@floods.org or by telephone at 608-828-6338 if you have further questions.

Sincerely,

Bill Nechamen, CFM
Chair

Association of State Floodplain Managers, Inc.

ATTACHMENT A SUGGESTED SPECIFIC EDITS TO PROPOSED SPECIAL FLOOD HAZARD DETERMINATION FORM

General Comments

1. Each subsection and section is not as clearly delineated as the old one (heavier lines separate sections on the current one)
2. Remove HTTP:// off of all websites, except MSC
3. Expiration Months are different (May vs April); should they not be the same and just the year change?
4. There needs to be a break and heading on Page 2 when the instructions start

Specific Comments

1. Section I has a Descriptor ("Loan Information"); to be consistent, Section II should as well
2. On the first page in Section II B's heading, the word "home" is missing; it only says "...affecting building/mobile"
3. On the first page in Section II B.3., the Yes/No should be after the question, not after the "If so, what is the: "; example:

Is there a Letter of Map Change (LOMC)? Y N If so, what is the: Date Case No.
4. On the first page, in C., should one of the choices be *Federal Flood Insurance is not available because the property is a Section 1316 designated structure?*
5. On page 2, under Section 2.A.4, the Map Service Center is not the place to send the user for Community Status Book. In Section C, the user is directed to www.FEMA.gov/FEMA/CSB.shtm. This URL should also be used here to 1) be consistent in directions and 2) it is more difficult to find the CSB in the MSC website.
6. On page 3, under Section 2.B.3:
 - a. The instructions are not clear. It should first state to check the appropriate box. Right now it says the field can remain blank. That should only be true if there is no LOMC.
 - b. Do not use asterisks for bullets; users may be looking for where the asterisks are being referred from
 - c. On the second asterisk, the first sentence is not a sentence. It should be combined with the second one; e.g., the period after 1994 should be a comma and "Information" start with a lower-case "i".
 - d. The MSC URL does not need "portal" at the end (it is correctly shown elsewhere)
7. On page 3, under Section 2.B.5, the title needs to be underlined to be consistent
8. On page 3, in Section C, there needs to be a blank line between the first and second paragraphs to be consistent