

**Curtis Sumner, Executive Director
American Congress on Surveying and Mapping
Before the House Finance Committee
Subcommittee On Housing and Community Opportunity
Regarding H. R. 1682**

June 12, 2007

Chairwoman Waters, ranking Member Biggert and members of the Subcommittee, I wish to thank you for the opportunity to speak with you about the important issues contained in H. R. 1682, the Flood Insurance Reform and Modernization Act of 2007. My name is Curtis Sumner, and I am the Executive Director of the American Congress on Surveying and Mapping.

I ask that the complete text of my written testimony be placed in the permanent record for this hearing.

The American Congress on Surveying and Mapping (ACSM) is a professional association of surveyors, cartographers, and other geospatial practitioners.

Since its creation just prior to World War II, ACSM, has provided input to the Congress and federal agencies on a variety of issues and programs related to the disciplines of surveying, cartography, and other geospatial sciences.

The diversity of its professional membership is among the reasons ACSM is considered to be a valuable asset and source of expertise to those interested in such issues.

Through the collective expertise among its four member organizations, ACSM has the ability to internally discuss a wide range of topics related to the geospatial disciplines of cartography, geodesy, geographic and land information, and surveying, then convey its collective input.

ACSM is comprised of individuals who serve the public in one way or another. Our members serve as educators in the colleges and universities throughout the country, work in varying levels of government service, or are professionals who, by virtue of their education and expertise, are licensed by the various states to provide services that their fellow citizens cannot provide for themselves.

Among the issues on which we have worked with federal agencies is our management of the Certified Floodplain Surveyor program created by FEMA to help reduce costs to FEMA related to the review of the submittals (on behalf of property owners) of Letters of Map Amendment (LOMA) and Letters of Map Amendment based on Fill (LOMR-F). LOMA and LOMR-F applications result when property owners believe the information depicted on Flood Insurance Rate Maps (FIRMs) does not correctly represent whether their respective properties lie within a flood hazard area.

ACSM strongly supports the intent of H. R. 1682, the Flood Insurance Reform and Modernization Act of 2007, but has some general comments to make with regard to specific items in Section 21 of the bill that ACSM believes will both strengthen and clarify the intent of the bill.

Other ACSM officials and I would welcome opportunities to meet with Congressional staff to further address the suggestions and issues discussed in my testimony.

Section 21 (k) calls for review, updating, and maintaining national flood insurance program rate maps. After discussing this issue with ACSM members familiar with it, I suggest that language be included in the bill that defines *updating* as more than simply digitizing old outdated maps. Many of the Flood Insurance Rate Maps (FIRMs) are over 20 years old. While those maps were useful for their intended purpose at the time they were created, in many cases they are no longer adequate to do so. Due in part to the perception that digitized information is often construed as being superior to non-digital or paper maps, merely publishing digitized versions of those same maps may result in public misunderstanding that they represent current flood risks.

The bill's language should require the development of a plan for how and when to produce new geo-referenced maps, using appropriate technological advancements, and setting minimum standards for accuracies as appropriate for the situation.

The bill should not read so as to prohibit local or state agencies from mapping areas they deem it necessary to map, but should provide that mapping of undeveloped areas such as swamplands, state and national forests, and other preserved areas (such as habitat zones) that are unlikely to be developed is not mandated for updating.

The bill should include language expressly establishing and authorizing a FEMA map maintenance program.

The vast number of submittals of the previously mentioned LOMA and LOMR-F applications are evidence that the current map maintenance program is inadequate. A plan for the timely maintenance and updating of all maps, not just those in the areas affected by Hurricanes Katrina and Rita, will reduce the number of such applications and save significantly on the amount of money spent reviewing them.

Section 21 (k) (2) (A) (i) requires that the 500-year floodplain (0.2% annual chance of flooding) be depicted on each updated map. While our members agree with this requirement in general, we suggest that the bill include language that would provide that adequately created “future conditions” maps (depicting ultimate build-out conditions) prepared by state or local jurisdictions be deemed to be compliant with the 500-year floodplain requirement of H. R. 1682.

An example of such maps are those created for five (5) urban areas in North Carolina that will be provided to the committee staff, and that I also ask be made part of the record of this hearing record.

ACSM applauds the reestablishment of the Technical Mapping Advisory Council in Section 21 (7) (b) of H. R. 1682, but we are not sure that its language provides sufficient authorization to the Council to allow it to function in the same manner as the previous council. We recommend that the bill be reviewed to insure such authorization.

In addition, ACSM represented the surveying and mapping community on the previous Technical Advisory Council, and we believe that our diversity of expertise and collective approach to issues makes us an appropriate choice for representation on Council that would be reestablished by H. R. 1682.

Since the last Technical Mapping Advisory Council was in place, the Cooperating Technical Partners program was established by FEMA. This program has leveraged partnerships with local, state, and regional organizations towards the development of modernized FIRMs. ACSM encourages the inclusion of representation on the reestablished Technical Mapping Advisory Council by the Cooperating Technical Partners.

In closing, I thank the House Finance Committee and the Subcommittee for recognizing the need to address the flood map modernization program, and I want to thank the Subcommittee for considering the suggestions contained in my testimony today.

Again, I wish to express my gratitude for being allowed asked to participate in this hearing, and reiterate the commitment of ACSM to work with Congressional staff for the betterment of H. R. 1682.

I am prepared to answer any questions you may have for me.