Carroll County Floodplain Policy #2
FEMA Zone A's (no base flood elevations)

Objective

To avoid creating any more lots in the mapped FEMA floodplains where the homeowner may be forced to purchase flood insurance, while at the same time minimizing unnecessary delay and expense.

Policy

On development properties where FEMA has established Zone A floodplains (floodplains without base flood elevations) and:

1. No changes have occurred in the watershed to invalidate the original study.
2. The development will not impact the "corrected" floodplain based on calculated BFE's.

Procedure

The lots or the buildable portion of the lots must be removed from the FEMA floodplain. They may be removed by a metes and bounds description, through the LOMA process. The justification can be BFE's calculated using the Carroll County "simplified" analysis technique.

Justification

At a Maryland Association of Floodplain Managers meeting held Wednesday, May 25, 2005, Martin Covington and Jason Stick brought this up as a recurring problem situation that we are encountering in program implementation. Present at the meeting were representatives from Michael Baker, PBS&J, Greenhorne & O'Mara, URS, Watershed Concepts and John Joyce (the state NFIP coordinator). We presented the situation that we are encountering with approximate "A" zones and showed examples of our Carroll County "simplified" analysis technique that we are using to determine base flood elevations on unmapped "county" streams. The representatives were unanimous that the Carroll County "simplified" technique is more than adequate to meet FEMA regulation 60.3(b)(3) and provide justification for LOMAs to remove property or structures from the mapped "A" zone. However, only HEC-RAS studies can justify LOMRs. The approximate techniques are not adequate to provide justification for revising the official maps.

The representatives warned us that although use of ultimate conditions watershed discharges is encouraged at the local level, FEMA might require existing condition hydrology to support the LOMA. Tabulating both in the original simplified study report could be to the applicant's advantage.

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