



Floodplain Management

The 8-Step Process is required by [EO 13690](#) (Establishing an FFRMS) and [24 CFR Part 55](#). The Federal Flood Risk Management Standard (FFRMS) is effective for HUD funded projects as of June 24, 2024.

The floodplain is now defined as the Federal Flood Risk Management Standard (FFRMS) floodplain, no longer the 100-year floodplain (or 500 year for critical actions).

The 8-step process has been amended to incorporate FFRMS requirements including new notification requirements for property owners, buyers, developers, and renters, and identifies specific hazards and information that must be included in notifications

STEP 1: Determine whether the proposed action is in the FFRMS floodplain

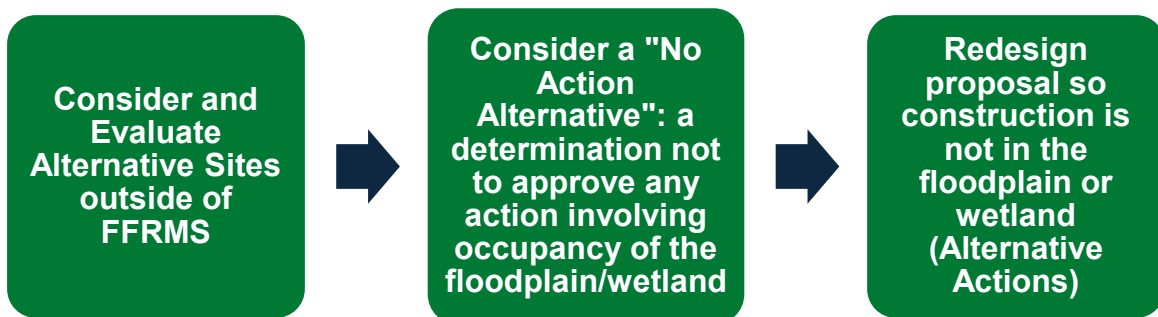
- Use the [Federal Flood Risk Standard Support Tool \(FFSST\)](#) where data is available.
- For all approaches, the FFSST will help determine the appropriate vertical flood elevation and corresponding horizontal FFRMS floodplain. FFSST Free Value Approach Report will include FFRMS BFE.
- **Nonexistent or Inadequate FFSST Data?**
 - Use [FEMA Map Service Center](#) to find BFE for your project. FEMA provided preliminary or pending FIRM, FIS, or advisory flood elevations are also appropriate.
 - Use [Vermont Agency of Natural Resources \(ANR\) Atlas Mapping Tool](#) to create a supplementary floodplain map.
 - Consult the applicable DEC [Floodplain Manager](#) if the project location is unmapped, if there is any uncertainty of a project's BFE, or if a project location falls within the FFRMS floodplain
- IF project elevation is EQUAL TO OR LOWER than floodplain that results from adding 2 feet to BFE (3 feet for critical actions), the 8 step process is required.
- If the project involves new construction or substantial improvement, elevation requirements apply.
- If the project elevation is higher than BFE+2, then floodplain management compliance is complete.



STEP 2: Publish the Early Notice. Notify the public for early review of the proposal and involve the affected and interested public in the decision-making process.

- Use the [FFRMS Early Notice Template](#); publish in newspaper or accessible government website.
- Minimum of 15 calendar days shall be allowed for comment.
- When the proposed activity is located in/affects a community with environmental justice concerns, public comment and decision making shall be coordinated with consultation and decision making under HUD policies implementing EO 12898.
- Contact VCDP Environmental Officer for **Notification of Floodplain Hazard Requirements** .

STEP 3: Identify and evaluate practicable alternatives.



STEP 4: Identify potential direct & indirect impacts associated with floodplain and/or wetland development.

- Lives & Property
 - What portion of the site is subject to flood risk?
 - How many residents/workers are being introduced into the development area?
 - What is the cost/value of the proposed development?
 - Public safety communications and data related to flood risk
- Beneficial Floodplain or Wetland Values:
 - Topographic information that can inform flooding patterns
 - Water Resources- Flood moderation, water quality maintenance, & groundwater recharge.



- Climate Resources- Effects of changes in landcover.

STEP 5: Design or modify the proposed action to minimize the potential adverse impacts to lives, property, & natural values in the floodplain and/or wetland and to preserve its value.

- Elevation must be documented on an Elevation Certificate or a Floodproofing Certificate that lists the minimum elevation or floodproofing requirement for new construction or substantial improvements consistent with the identified FFRMS floodplain.
- Use the table below to determine elevation and floodproofing requirements for your project. Work with the Environmental Officer to ensure compliance is met.

Property Type	Activity	Elevation	Floodproofing permitted?
Residential	New construction & Substantial improvement	Required to elevation of FFRMS floodplain	Only for mixed use buildings where all residential is elevated
Non-residential	New construction & Substantial Improvement	Required to elevation of FFRMS floodplain	Yes

Evacuation Plan

- Evacuation plan must be developed that includes safe egress route(s) out of the FFRMS floodplain, plans for evacuating residents with special needs, and clear communication of the evacuation plan and safety resources for residents.
- All critical actions in FFRMS floodplain must maintain an early warning system.

STEP 6: Re-evaluate the alternatives.

- Is the proposed project still practicable considering exposure to flood hazards?
- Are the alternatives rejected at Step 3 now practicable due to information gained in Step 4 & 5?



8 step FFRMS Guidance

- Consider impacts to: human life, real property, & the beneficial functions and values of the natural features of the floodplain and/or wetland.
- Re-evaluation: Include a review of the economic costs of each alternative.

STEP 7: Publish Final Notice-Determination of no practicable alternative.

- Use the [FFRMS Late Notice Template](#); publish in newspaper or accessible government website.
- Minimum of 15 calendar days shall be allowed for comment.
- Justify why the development must be located on this site.
- Include a list of alternative site(s) considered under Step 3.
- Cite all mitigation measures to be taken to minimize adverse impacts and to restore the floodplain and/or wetland.
- Include responses to any comments in the 8-Step document.

STEP 8: Implement the proposed action.

- After taking public comments into consideration, the project can move forward.
- Mitigation measures will be conveyed to the sponsor in writing via the Environmental Release & Environmental Review Record (ERR) on GEARS.

OLD FLOODPLAIN MANAGEMENT REQUIREMENTS	FFRMS REQUIREMENTS
<ul style="list-style-type: none"> • Flood zone determination • FIRMette map #, panel # and effective date • Summary and conclusions of 8-step, 5-step • Flood Elevation Certificate and/or Flood Proofing Certificate (if applicable) • Required mitigation measures (if applicable) 	<ul style="list-style-type: none"> • FSST Report showing FFRMS elevation • If no FFSST data available, FIRMette map #, panel #, and effective date with • Elevation Certificate/ Floodproofing certificate • Summary and conclusions of 8-step, 5-step • Required mitigation measures



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