

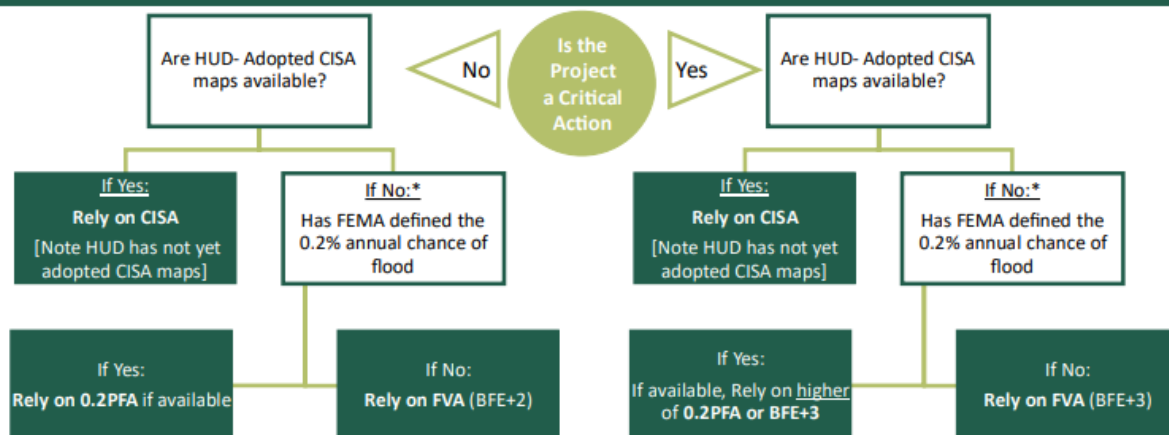


Federal Flood Risk Management Standard (FFRMS) 8 Step Process Memo

This memo provides general guidance intended to assist the applicant in complying with changes to 24 CFR Part 55, HUD's floodplain management regulations, that implement the Federal Flood Risk Management Standard (FFRMS). FFRMS is effective for HUD funded projects as of June 24, 2024. More information on HUD FFRMS can be found on the [HUD Floodplain Management](#) webpage.

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.

Identifying the FFRMS Floodplain



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

- Use the [FEMA Map Service Center](#) to find FIRM for your project site. FEMA provided preliminary or pending FIRM, FIS, or advisory flood elevations are also appropriate.
- If 500-year floodplain is mapped, that is the FFRMS floodplain.
- If 500-year floodplain is not mapped, or if there is uncertainty whether a project location falls within the FFRMS floodplain, use the Freeboard Value Approach.
 - Freeboard value= BFE + 2 feet (3 for critical actions)
 - IF project elevation is EQUAL TO OR LOWER than this, your project is in the FFRMS floodplain and the 8 step process is required.

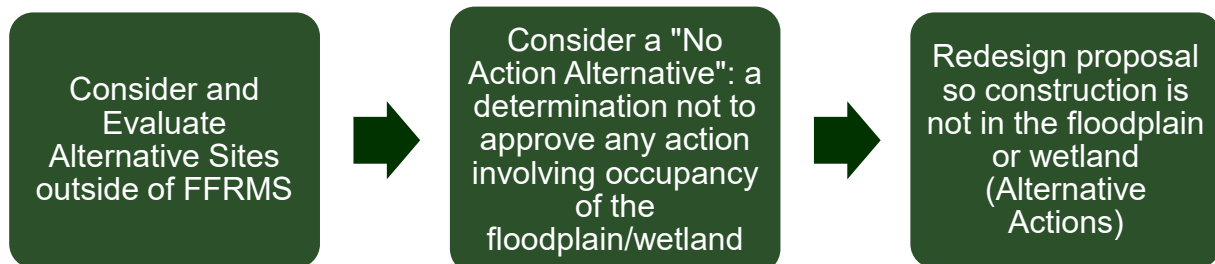


- If project elevation or BFE is unknown, determine the FFRMS using an elevation profile (see the **Approaches for defining the FFRMS** guidance on the [Environmental Review webpage](#)).
- If the project involves new construction or substantial improvement, elevation requirements apply (see **Step 5**).
- If the project elevation is higher than BFE+2 feet, 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](#) and 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.
- Complete the [Notification of Floodplain Hazard Requirements](#); these documents can be found on the [Environmental Review webpage](#)

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 potential adverse impacts to lives, property, & natural values in the floodplain and/or wetland and to preserve its value

Elevation and floodproofing requirements

- 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 requirements for your project and 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.
- Model evacuation plan can be found on VCDP website

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?
- 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.

Floodplain Management Statutory Checklist Requirements

- FIRMette map #, panel #, and effective date with BFE OR elevation profile using USGS Topo Map
- Elevation Certificate/ Floodproofing certificate
- Summary and conclusions of 8-step, 5-step
- Early and public notice copies
- Required mitigation measures

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