

---

---

## DRAFT MEMORANDUM

---

---

**TO:** NCTCOG Floodplain Management Task Force (FMTF)  
**FROM:** NFIP-CDC Model Consolidation Team  
**SUBJECT:** Summary of Updates to the CDC Process  
**DATE:** November 7, 2019

---

NCTCOG, USACE, and FEMA have been working together for several years to combine the upper Trinity River FEMA Effective Model and the upper Trinity River CDC Model. This effort resulted in the development of a recommended NFIP-CDC Consolidated Model. The NFIP-CDC Consolidated Model is a combined HEC-RAS model under one \*.prj file with two plans representing the FEMA (existing land use) and the CDC (future land use) conditions.

The benefits of the NFIP-CDC Consolidated Model include:

1. GIS-based website for improved model distribution and application tracking
2. Improved communication among all participants in the floodplain development process
3. An updated and georeferenced CDC Model
4. Closeout process that represents constructed projects in the CDC Model and incorporates FEMA LOMRs

The NFIP-CDC Model Consolidation Team developed recommendations to improve the current NFIP and CDC processes. A summary of the more significant updates to these processes as a result of the NFIP-CDC Model Consolidation effort is as follows:

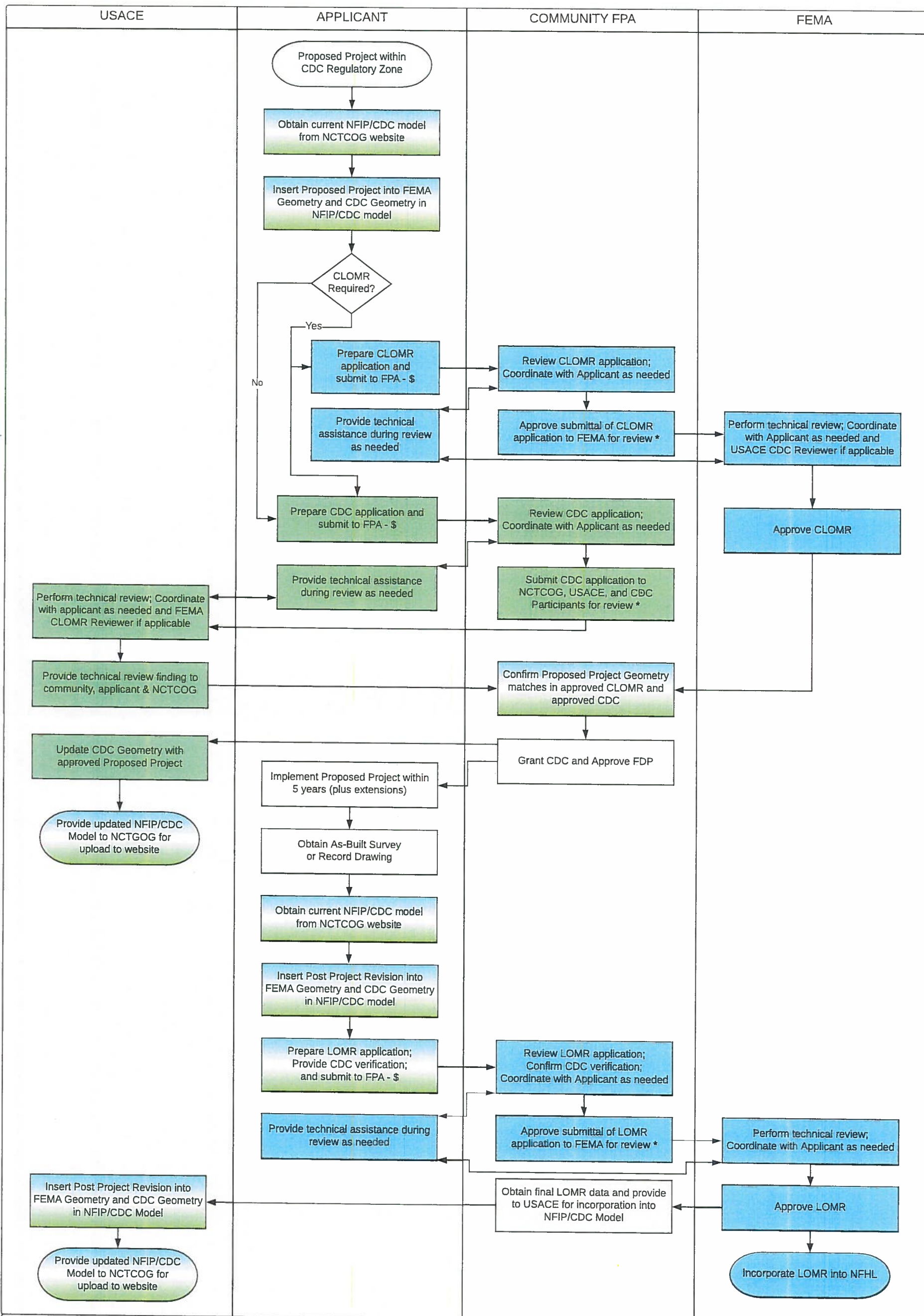
1. No changes are recommended to the NFIP process at this time. However, improved communication among FEMA, USACE, and the local jurisdiction will be required.
2. NCTCOG will develop and host a GIS-based website for the NFIP-CDC Consolidated Model. The website will include the opportunity to download the NFIP-CDC Consolidated Model and track progress of CDC permit reviews. USACE will continue to be the responsible agency for maintaining the NFIP-CDC Consolidated Model. USACE will be responsible for uploading the updated NFIP-CDC Consolidated Model to the NCTCOG website.
3. When required, the CLOMR process will continue to be performed directly with FEMA. However, the NFIP-CDC Consolidated Model includes the current FEMA Effective Model that must be used. FEMA comments pertaining to the CLOMR application will be shared with USACE and the local jurisdiction.
4. The CDC Process can proceed while a CLOMR is in progress at the Applicant's risk. The CDC Process review period remains 30 days for the CDC participants. USACE has 30 days to complete a Technical Review after the CDC Cost Recovery Fee funding has been processed.

5. If a CLOMR is required, the local jurisdiction is responsible for confirming that the proposed project geometry in the approved CLOMR matches that in the approved CDC application. If the proposed project geometries do not match, the Applicant is responsible for making corrections accordingly.

Upon issuance of the CDC permit by the local jurisdiction, USACE will update the NFIP-CDC Consolidated Model geometry file and upload it to the NCTCOG website, along with an update to the CDC Tracking table.

6. As-built surveys or record drawings will be required after a proposed project has been constructed. The Applicant must download the current NFIP-CDC Consolidated Model from the NCTCOG website and incorporate the as-built information into the model. The Applicant shall submit the LOMR package to the local jurisdiction for review. Note that an additional USACE Model Maintenance Fee will be required with this submittal. After the model is determined to be acceptable, the LOMR package will be submitted to FEMA per the local jurisdiction's process.
7. After FEMA approves the LOMR, the local jurisdiction will submit the model to USACE who will insert the completed project into the NFIP-CDC Consolidated Model and upload to the NCTCOG website.

The costs for the new NFIP-CDC Consolidated Model process have yet to be determined. NCTCOG will develop and host a website for the NFIP-CDC Consolidated Model to be housed and checked in/out. The FEMA costs for CLOMR and LOMR reviews will be consistent with other FEMA CLOMR and LOMR reviews. The CDC Process will add a second cost to incorporate LOMRs and/or as-built/record drawings into the CDC Model. A "catch-up" effort needs to be performed to incorporate LOMRs issued since the NFIP-CDC Consolidated Model was finalized in 2017. All of these costs will need to be reviewed and finalized by NCTCOG and USACE.



LEGEND:



- NFIP Process using FEMA Geometry

- CDC Process using CDC Geometry

- Combined Process using FEMA Geometry and CDC Geometry

\$ - Review Fee Required

\* - Follow local regulations for official submittal