



October 1, 2025

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Maryland Department of Planning  
201 Baptist Street, Suite 24  
Salisbury, MD 21801

### **Re: 2025 Nuisance Flood Plan Update**

The Baltimore City Disaster Preparedness and Planning Project (DP3) was updated in November 2023 and serves as Baltimore’s hazard mitigation plan and climate adaptation plan. Its purpose is to minimize impacts and damage to people, property, the environment, and the economy. In addition to guiding City work to keep everyone who lives, works, plays, learns, and grows safe, as well as businesses and infrastructure that help us thrive, the DP3 fulfills Federal Emergency Management Agency (FEMA) requirements to update the city’s Hazard Mitigation Plan every 5 years. The DP3 serves as the 2025 update to the Nuisance Flood Plan.

In order to determine the appropriate strategies and actions for climate adaptation and hazard mitigation, natural hazards which threaten the City were identified. Those that are applicable towards the update of the City’s Nuisance Flood Plan include:

- Flooding (Section 4)
- Coastal Hazards—Hurricanes, Sea Level Rise, Storm Surge, Coastal Inundation (Section 6)

For the purpose of the DP3, and as deemed appropriate by Baltimore City Core Planning Team, riverine and inland, flash, urban and stormwater, coastal and nuisance flooding, sea level rise, and dam failure are the main flood types of concern for Baltimore City. Section Four (4) also discusses the impact of climate change on flooding across the city while considering cascading and compounding impacts. The vulnerability assessment (page 4-44) looks at the impact of flooding on the population, structures, and natural, historic, and cultural resources and considers the 1% annual chance flood, 0.2% annual chance flood, and area inundated by the 2050 mean sea level rise scenario.

Coastal Hazards, Section 6 within the City’s DP3, includes tropical cyclones (including tropical storms and hurricanes), Nor’easter, and storm surge. The section includes discussion on the hazard description, including location, extent, previous occurrences and losses, and future probability. Impacts of climate change on the coastal hazards was also included. The vulnerability assessment includes discussions on

the impacts to population, structures, and natural/historic/cultural resource and future changes that may impact vulnerability.

### **How does the plan meet the requirements of the law?**

The DP3 defines nuisance flooding in Section 4 and includes analyses demonstrating the potential increase in flooding frequency under various sea level rise scenarios. The plan also includes a vulnerability assessment under each identified hazard in Baltimore City. Section 3 of the DP3 outlines the Risk Assessment methodology used in the analysis. Each hazard includes a vulnerability assessment that looks at population, structures, critical facilities, and community lifelines.

This letter is posted on the Baltimore City Office of Sustainability's Website located [here](#). Attached to this letter is the checklist provided in the State of Maryland Nuisance Flood Plan Development Guidance 2024 Update that calls out relevant sections of the DP3.

### **Plan Approval and Adoption:**

The Baltimore Planning Commission adopted the 2023 DP3. The adoption by the Planning Commission was done in accordance with The Charter of Baltimore City by a vote of 8 in favor and 0 against, and 0 abstaining on November 30, 2023. The Adoption Resolution is included in the 2023 DP3.

The DP3 was submitted to FEMA for approval in November of 2023. In a letter dated December 13, 2025, the plan received a satisfactory rating on all required criteria for Hazard Mitigation Plan under the Code of Federal Regulations. The Plan was designated Approvable Pending Adoption by FEMA as of November 30, 2023. This letter is included in the 2023 DP3.

### **Where is the Plan Located?**

The DP3 is available on the Baltimore City Office of Sustainability's website under ['Plans.'](#) This letter is also located [here](#) on the Baltimore City Office of Sustainability's website. Sincerely,

*Grace Hansen*

Grace Hansen, CFM  
Coastal Planner  
Baltimore City Department of Planning| Office of Sustainability

*Ava Richardson*

Ava Richardson,  
Sustainability Director,  
Baltimore City Department of Planning| Office of Sustainability

## APPENDIX: Checklist

- Does your submission include a cover letter?
- Does your cover letter explain the following?
  - Link to the plan?
  - What is contained in the plan?
  - How does the plan meet the requirements of the law?
  - How was the plan adopted or approved?
  - Where is the plan publicly available?
- Did you provide a nuisance flood plan or other related document that serves as a nuisance flood plan for the next five years?
  - Does your plan include the following?
    - ✓ **A description or summary of sources of flooding** (fluvial, pluvial, riverine), for example identification of areas where precipitation events cause flooding that impacts or exacerbates tidal nuisance flooding. **Section 4-2**
    - ✓ **An analysis of the documented reports** (2020-2025) to date and determine if they were submitted from areas identified in the 2020 plan, or if they are in new areas. **Table 4-5 ‘Flood Events in Baltimore City 1996-2022’; StoryMap forthcoming showing MyCoast and 311 Reports from 2020-2025.**
    - ✓ **Identification of vulnerable community resources**, critical facilities and jurisdiction-identified infrastructure impacted by flooding, (i.e health centers, schools, fire departments, etc.) **(Table 4-16 Lifelines Located in the 1-Percent and 0.2-Percent Annual Chance Event Floodplain)**
    - ✓ **Identification of underserved and overburdened communities** within or near areas that experience nuisance flooding or may be affected by the impacts of nuisance flooding **(Section 4-7 Vulnerability Assessment)**
    - ✓ **Connections to or incorporation into existing plans**, such as hazard mitigation, comprehensive, green infrastructure plans, emergency evacuation plans (see Step 2)
      - [2023 Disaster Preparedness and Planning Project \(DP3\)](#)
      - [Our Baltimore. Your Baltimore: A Comprehensive Plan for the City of Baltimore – Healthy Communities: Environmental Justice, pp. 190-194](#)
      - [Memo: Baltimore Inner Harbor Promenade Sea-level Rise & Coastal Flooding Considerations](#)
      - [Reimagine Middle Branch Master Plan](#)
    - ✓ **Prioritized flooding areas for action** or further study and identification of projects to mitigate or adapt to flooding within the next five years **(Table 14-2 Action Plan)**

- ✓ **Process for communicating increasing flood risk**, especially to areas experiencing new or increased tidal flood events, or areas that may experience flooding in the future **(Table 14-2 Action Plan; CRS Information)**
  - ✓ **Evaluation of existing policies and ordinances** and whether they meet flood planning needs and whether they cover both inventoried and future flood areas **(Table 14-2 Action Plan)**
  - ✓ **Identification of potential funding sources** and partnerships for identified projects. **(Table 14-2 Action Plan)**
- Did you follow the six steps to updating your nuisance flood plan? See *Figure 1* and pages 13-27.
  1. Determine your nuisance flood planning team. **The Hazard Mitigation Advisory Committee is an advisory group that provided oversight during the planning process of the DP3. (Table 1-3 HMAC Members provides a comprehensive list of members)**
  2. Evaluate and analyze existing plans **(reviewed 2023 DP3 Update)**
  3. Evaluate thresholds and impacts, update as necessary **(Key Changes from the 2018 DP3 are found in Section 4 and Section 6 of the DP3)**
  4. Develop the plan with recommendations
  5. Submit the plan
  6. Implement the plan **(Table 14-2 Action Plan)**
- Do you have a plan to communicate flood risk to your communities? **Community Rating System (CRS) 2022 Reverification attached**



COMMUNITY  
RATING  
SYSTEM

VERIFICATION  
REPORT

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City of Baltimore, MD

Verified Class 5

NFIP Number: 240087

Cycle-Phone Verification

Date of Verification Visit: July 29, 2022

This Verification Report is provided to explain the recommendations of Insurance Services Office, Inc. (ISO) to DHS/FEMA concerning credits under the Community Rating System (CRS) for the above named community.

A total of 2553 credit points are verified which results in a recommendation that the community remain a CRS Class 5. The community has met all Class 5 prerequisites. The following is a summary of our findings with the total CRS credit points for each activity listed in parenthesis:

Activity 310 – Construction Certificate Management: Credit is provided for having written construction certificate management procedures for all new and substantially improved/substantially damaged buildings. (38 points)

Activity 320 – Map Information Service: Credit is provided for furnishing inquirers with basic flood zone information from the community's latest Flood Insurance Rate Map (FIRM). Credit is also provided for the community offering additional FIRM information, flood depth data, special flood related hazards, historical flood information, and natural floodplain functions. The service is publicized annually and records are maintained. (90 points)

Activity 330 – Outreach Projects: Credit is provided for informational outreach projects, general outreach projects, and targeted outreach projects. These projects are disseminated annually. Credit is also provided for having a pre-flood plan for public information. (204 points)

Activity 340 – Hazard Disclosure: Credit is provided for state and community regulations requiring disclosure of flood hazards. Real estate agents provide a brochure advising prospective buyers about insurance and checking property flood hazards. (18 points)

Activity 350 – Flood Protection Information: Documents relating to floodplain management are available in the reference section of the Enoch Pratt Library. Credit is also provided for floodplain information displayed on the community's website. (88 points)

Activity 360 – Flood Protection Assistance: Credit is provided for offering one-on- one advice regarding property protection and making site visits before providing advice. Credit is also provided for offering advice on financial assistance programs and advisor training at appropriate Emergency Management Institute (EMI) courses. The service is publicized annually and records are maintained. (69 points)

Activity 420 – Open Space Preservation: Credit is provided for preserving approximately 26 percent of the Special Flood Hazard Area (SFHA) as open space. Credit is also provided for regulations that protect natural shorelines and channels. (393 points)

Activity 430 – Higher Regulatory Standards: Credit is provided for enforcing regulations that require development limitations, foundation protection, cumulative substantial improvement, protection of critical facilities, local drainage protection, and coastal A Zone structures to meet V Zone building criteria. Credit is also provided for the enforcement of building codes, a Building Code Effectiveness Grading Schedule (BCEGS®) Classification and regulations administration. (341 points)

Activity 440 – Flood Data Maintenance: Credit is provided for maintaining and using additional map data in the day to day management of the floodplain. Credit is also provided for establishing and maintaining a system of benchmarks and maintaining copies of all previous FIRMs and Flood Insurance Study reports. (177 points)

Activity 450 – Stormwater Management: The community enforces regulations for soil and erosion control and water quality. (51 points)

Section 502 – Repetitive Loss Category: Based on the updates made to the NFIP Report of Repetitive Losses as of May 4, 2022, the City of Baltimore, MD has 65 repetitive loss properties and is a Category C community for CRS purposes. The community is required to submit either a Repetitive Loss Area Analysis or Floodplain Management Plan. (No credit points are applicable to this section)

510 – Floodplain Management Planning: Credit is provided for the City of Baltimore Disaster Preparedness and Planning Project Plan, adopted on December 20, 2018. A progress report for the plan must be submitted on an annual basis. (264 points)

Activity 520 – Acquisition and Relocation: Credit is provided for acquiring and relocating 78 buildings from the community's regulatory floodplain. (190 points)

Activity 530 – Flood Protection: Credit is provided for 53 buildings that have been flood proofed and otherwise modified to protect them from flood damage. (35 points)

Activity 540 – Drainage System Maintenance: Credit is provided for the regular inspection and maintenance of the community’s natural drainage system, identified problem sites, and records are maintained. Credit is provided for implementing an ongoing Capital Improvements Program. The community enforces a regulation prohibiting dumping in the drainage system. (295 points)

Activity 610 – Flood Warning and Response: Credit is provided for a program that provides timely identification of impending flood threats, disseminates warnings to appropriate floodplain residents, and coordinates flood response activities. Credit is also provided for the designation as a Storm Ready Community by the National Weather Service. A description of the flood exercise or After Action Report from an actual flood event must be submitted on an annual basis. Warning information and safety measures must be publicized annually. (255 points)

Activity 630 – Dams: Credit is provided for a State Dam Safety Program. (45 points)

Activity 710 – County Growth Adjustment: All credit in the 400 series is multiplied by the growth rate of the county to account for growth pressures. The growth rate for Baltimore City, MD is 1.01.

Attached is the Community Calculations Worksheet that lists the verified credit points for the Community Rating System.

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Date Report Prepared: October 21, 2022

