



FEMA

SEP 28 2011

The Honorable Edward J. Brunz
Mayor, City of Burlington
833 South Spruce Street
Burlington, Washington 98233-1945

Dear Mayor Brunz:

This is in response to a letter sent by Scott Thomas, City Attorney, City of Burlington, dated June 27, 2011, to the Department of Homeland Security, Federal Emergency Management Agency (FEMA). In that letter, Mr. Thomas requested that FEMA convene a Scientific Resolution Panel (SRP) to review the technical and scientific data submitted by the City of Burlington and the City of Mount Vernon in its March 30, 2011, joint appeal of FEMA's Preliminary Flood Insurance Study (FIS) and Flood Insurance Rate Map (FIRM) for Skagit County, Washington. As you may be aware, the Preliminary FIS and FIRM for Skagit County are on hold until FEMA reassesses and develops alternative analyses for identifying flood hazard risks associated with unaccredited levees. Consequently, Mr. Thomas' request for an SRP review is premature because the Preliminary FIS and FIRM for Skagit County may change as a result of FEMA's reassessment of its levee analysis approaches.

FEMA is committed to working with communities such as yours to ensure the flood elevation determinations depicted on FIRMs are scientifically and technically correct and based on the best available data. Before finalizing its proposed flood elevation determinations, FEMA publishes a notice of the proposed elevations twice in a local newspaper and once in the *Federal Register*. FEMA also initiates a 90-day appeal period following the second publication in a local newspaper. A community may request an SRP to assist FEMA in resolving the conflicting data submitted by the community during the appeal period and FEMA's data supporting its proposed flood elevation determinations. The SRP will review the conflicting data, deliberate, and render a written recommendation to FEMA.

As referenced above, FEMA is reassessing its current levee analysis, and is developing a revised analysis and mapping approach to identify flood hazards in areas impacted by unaccredited levees. Under the current levee analysis, FEMA assumes that during the base (1-percent-annual-chance) flood, the unaccredited levee would allow flood waters to flow landward of the levee. This is commonly referred to as the "without-levee" modeling approach. Although the current modeling approach is technically sound, FEMA is revising its approach to account for several typical scenarios and actual conditions associated with unaccredited levees.

FEMA used the "without-levee" modeling in developing the Preliminary FIS and FIRM for Skagit County. Once the revised levee analysis is finalized, FEMA will apply it to Skagit County, which may result in new proposed flood elevation determinations and trigger a new appeal period.

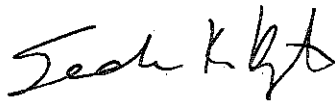
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An SRP for the Preliminary FIS and FIRM is not appropriate at this time as the city may decide an appeal is no longer warranted, or may want to appeal the new proposed elevation determinations and submit new data.

I hope this information is helpful to you. If you need additional information or assistance, please contact Ryan Ike of the FEMA Region X Office in Bothell, Washington, by telephone at (425) 487-4767.

Sincerely,

A handwritten signature in black ink, appearing to read "Sandra K. Knight". The signature is fluid and cursive, with the first name "Sandra" being the most prominent.

Sandra K. Knight, PhD, PE
Deputy Associate Administrator for Mitigation

cc: Dominique Fernandez, National Institute of Building Sciences
Kenneth D. Murphy, Regional Administrator, FEMA Region X
Mark Carey, Director, Mitigation Division, FEMA Region X