



FEMA

April 29, 2011

Dear Community Chief Elected Official:

You may have heard that Administrator Craig Fugate of the U.S. Department of Homeland Security's Federal Emergency Management Agency (FEMA) recently implemented a policy change regarding the mapping process for areas behind levees which are not accredited to provide protection from a one-percent (1%) annual chance flood. This letter explains how the policy change may affect the Flood Insurance Rate Map (FIRM) update in your community.

In a response to members of Congress, FEMA committed to develop alternative approaches to the current "without levee" modeling technique employed for non-accredited levees when updating the FIRMs. The intent of the proposed policy change includes evaluating methodologies to assess the flooding risk landward of non-accredited levees more precisely. Please be advised that this change may result in increased and/or decreased base flood elevations in the vicinity of a non-accredited levee. While FEMA develops the new levee risk modeling guidelines and procedures, we will temporarily withhold the issuance of Letters of Final Determination (LFDs) for communities with levees not shown as providing protection from the 1-percent annual chance flood event.

This change only pertains to jurisdictions that have on-going mapping projects with riverine or coastal levees that cannot be accredited as providing protection per the Code of Federal Regulations (CFR) Chapter 44 Section 65.10. The applicable projects include Countywide/Partial Countywide Studies, Physical Map Revisions (PMRs), and Letters of Map Revision (LOMRs).

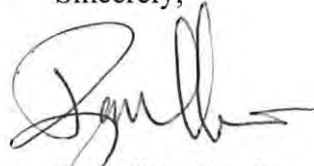
The proposed policy change only applies to active and future projects and does not apply retroactively to effective FIRMs or to FIRMs that have already been issued Letters of Final Determination (LFD).

As part of Region X's response to the policy change, we have reviewed your community's mapping project(s) and have determined that there are one or more non-accredited levees or Provisionally Accredited Levees (PALs) that are or could be affected by this levee policy change. Until the new levee risk modeling guidance is released, we will suspend the processing of the maps in areas with non-accredited levees. Portions of the project unaffected by levees may go forward, but the LFD will be delayed until the new guidance is developed and applied to your project.

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If your community prefers to have the study project proceed without applying the new levee risk modeling guidance, you may submit a formal written request stating the desire for FEMA to finalize the maps and your community's agreement to proceed with the maps using the approach currently specified in Appendix H of the 2003 *Guidelines and Specifications for Flood Hazard Mapping Partners* and relevant Procedure Memorandums. We will carefully review such a request and follow up with you and your staff to discuss the details. As the levee risk modeling procedures and guidance unfold, we will gain a better understanding on the detailed application for this project and will be providing you with more details as we receive them over the next few months. In the meantime, if you have questions about the proposed policy change, please contact Josha Crowley of the FEMA Region X Service Center. He can be reached by phone at (425) 329-3679 or by email at josha.crowley@starr-team.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Ryan Ike", with a long horizontal flourish extending to the right.

Ryan Ike, Chief
Risk Analysis Branch
Mitigation Division
FEMA Region X