Congress of the United States
Washington, DC 20515

February 18, 2011

The Honorable W. Craig Fugate
Administrator
Federal Emergency Management Agency
U.S. Department of Homeland Security
500 C Street SW, Washington, D.C. 20472

Dear Administrator Fugate:

We write to urge you to use your current authorities to discontinue the Federal Emergency Management Agency's (FEMA) use of "without levees" analysis to determine new Flood Insurance Rate Maps (FIRMs) in cases where a final determination has not been made and an affected community objects to such analysis in favor of more precise methods of flood modeling. "Without levee" modeling methods assume that a levee or flood control structure that exists in physical reality does not exist for the purposes of modeling, reducing the precision of flood maps and eroding public confidence in the mapping process itself.

We value the efforts of the National Flood Insurance Program to accurately reflect flood risk to the American public, but we also understand the negative impact the issuance of insufficiently accurate or insufficiently precise maps can have on communities at a time of economic uncertainty across our country. In investigating the methods and processes FEMA uses to make such flood hazard determinations, we have found that FEMA knowingly assumes that certain flood control structures that do exist in physical reality do not exist in the ensuing FEMA models, primarily for the sake of simplicity.

We support FEMA's efforts to maximize taxpayer dollars by choosing simpler, more cost-effective modeling techniques when appropriate. However, in cases where FEMA treats a flood control structure as if it has been completely wiped off of the map, we may be unnecessarily devaluing property and hurting the economies of cities, towns, counties and businesses. This approach is particularly troubling since FEMA has the tools at its disposal to obtain more precise data. Just because a levee is under repair or needs to be recertified does not mean that it provides no flood protection at all or that its level of protection cannot be sufficiently modeled. Current FEMA modeling techniques allow us to more precisely reflect the level of flood protection of such structures. When American jobs are at risk, FEMA should use the methods readily available to it rather than settle for an all-or-nothing approach, thus shifting the financial burden from the federal government to local governments and their citizens.

For these reasons, we request that you prohibit the use of such all-or-nothing modeling approaches when a community notifies you that it believes that it is negatively affected by

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"without levees" modeling. Even with such a prohibition in place, we are hopeful that FEMA will continue to use simpler, more cost-effective techniques when no community is harmed.

Thank you for your attention to this matter. Please do not hesitate to contact us if you have any questions about this request.

Sincerely,

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MEMBER OF CONGRESS

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