



FEMA

May 17, 2013

Malcolm Bowie, P.E.
Public Works Director, City of Aberdeen
Public Works Department
200 East Market Street
Aberdeen, Washington 98520

RE: Cities of Aberdeen and Cosmopolis, WA – Review of Levee Certification Data and Documentation

Dear Mr. Bowie:

Thank you for the submittal of levee certification documentation, received December 13, 2012, in support of your request to accredit the Chehalis River levee pursuant to the requirements set forth in the National Flood Insurance Program (NFIP) under 44 CFR 65.10 and the Provisionally Accredited Levee (PAL) agreement between the cities of Aberdeen and Cosmopolis and the Federal Emergency Management Agency (FEMA).

After an initial screening, FEMA deems the submitted certification documentation incomplete as summarized below. The PAL agreement expired on January 3, 2013. As you may know, FEMA is in the process of updating procedures and guidelines for assessing flood hazard areas behind non-accredited levees. As a result, new flood study projects involving de-accreditation of levees are being delayed until we have more information and available funding. The proposed revisions are currently outlined in *Revised Analysis and Mapping Procedures for Non-Accredited Levees*, released for public review in December 2011. For additional information about the revised levee analysis and mapping approach, please visit <http://www.fema.gov/living-levees-its-shared-responsibility/fema-revising-its-levee-analysis-and-mapping-approach>. Note that this review does not affect ongoing flood studies for Grays Harbor County. These updates will continue to show the levee as accredited.

Summary of Incomplete Certification Documentation

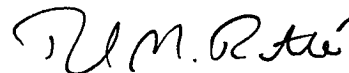
- 1) Certification - Please forward certification statements by a registered professional engineer of all of the engineering analyses performed in compliance with 44 CFR 65.10. This should include an analysis of the interior drainage that is missing from the current submittal. The certification statement must be accompanied by a signed and dated professional engineer stamp(s) indicating that the analyses have been performed correctly and in accordance with sound engineering practice. Alternatively, please submit a statement from an authorized Federal agency with responsibility for levee design, certifying that the levee continues to be adequately designed and constructed to provide protection from the 100-year (one-percent annual chance) base flood.

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- 2) Freeboard:
 - a. Note that FEMA released preliminary coastal engineering analysis for Grays Harbor County and recently initiated an update to the Flood Insurance Study for the Lower Chehalis River based on a U.S. Army Corps of Engineers (USACE) study. As a result, published Base Flood Elevations (BFEs) may change as compared to the effective data in the near future. If BFEs increase prior to receipt and acceptance of complete certification data and documentation, additional certification data may be necessary to show compliance with freeboard requirements.
 - b. Please provide a table and/or profile demonstrating current levee crest elevations and the computed water surface elevations to document compliance with freeboard requirements per 65.10, at all locations.
- 3) Geotechnical and structural – Certification of the levee should include a certified statement attesting that the previous geotechnical analyses pertaining to stability and settlement demonstrate compliance with 65.10. Otherwise, additional geotechnical and structural analyses may be necessary.
- 4) Interior drainage – As noted above, please prepare and submit an interior drainage analysis in accordance with 65.10(b)(6) and the 2003 *Guidelines and Specifications for Flood Hazard Mapping Partners*.
- 5) Please provide documentation demonstrating that a current Levee Operation and Maintenance Plan was officially adopted by the city. The plan must document formal procedures, including frequency of specific maintenance activities and names or titles of individuals responsible as well as the inspection program. The plan should address type of surfacing, including the presence of vegetation on and adjacent to the levee. The Operation component must also include specific actions, assignments, and personnel responsibilities and document a flood warning system that has sufficient warning time.

Please send additional certification documentation addressing these comments to my attention. Should you have questions regarding the certification requirements, engineering, and/or floodplain mapping efforts, please contact me by telephone at (425) 487-4657 or by e-mail at david.ratte@fema.dhs.gov.

Sincerely,



David M. Ratté, P.E.,
Regional Flood Engineer
Mitigation Division

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cc: The Honorable Bill Simpson, Mayor, City of Aberdeen
The Honorable Vickie Raines, Mayor, City of Cosmopolis
Guy Fielding, P.E., USACE, Portland District
Jerry Franklin, Flood Study/Risk Analysis Coordinator, Washington Department of Ecology
(DOE)
Donovan Gray, National Flood Insurance Program Coordinator, Washington DOE
The Office of Senator Maria Cantwell
The Office of Senator Patty Murray
The Office of Congressman Derek Kilmer

DMR:bb