



City of Coos Bay

Public Works and Development Department

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- MEMORANDUM -

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SUBJECT: LOCAL AND FEDERAL FLOODPLAIN INFORMATION FOR FUTURE PROJECTS LOCATED WITHIN A SPECIAL FLOOD HAZARD AREA

The City participates in a federal program called the National Flood Insurance Program (NFIP). The NFIP is a program created by Congress in 1968 that enables property owners in participating communities to purchase insurance protection from the government against losses from flooding. Participation in this program is based on an agreement between the City of Coos Bay and the Federal Government. The agreement is based on the understanding that the City will adopt and enforce a floodplain management ordinance (Coos Bay Municipal Code Chapter 17.195) to reduce future flood risks to new construction in Special Flood Hazard Areas (SFHAs). As such, the Federal Government will make flood insurance available within our community as a financial protection against flood losses.

A SFHA is a high-risk area defined as any land that would be inundated by a flood having a 1-percent chance of occurring in a given year (also referred to as the 100-year flood). These areas, along with other risk premium zones, are delineated on an official Federal Emergency Management Agency (FEMA) map commonly referred to as a Flood Insurance Rate Map (FIRM). The special flood hazard area can have several components identified on the FIRM such as base flood elevations, floodplain limits, floodway limits, etc. There is a great deal of private property located with the City of Coos Bay that is located within a Special Flood Hazard Area. Within the City of Coos Bay, the 100-year floodplains are identified by FEMA as either a Flood Zone AE or Flood Zone A.

Flood Zones AE are defined by FEMA as areas subject to inundation by the 1-percent-annual-chance flood event (100-year storm event) determined by detailed methods (hydrologic and hydraulic calculations). Base flood elevations (BFEs), or 100-year water surface elevations, are shown within these zones. Lenders require mandatory flood insurance purchase requirements for insurable structures within this zone.

Flood Zones A are defined by FEMA as areas subject to inundation by the 1-percent-annual-chance flood event (100-year storm event) generally determined using approximate methodologies. Because detailed hydraulic analyses have not been performed, no Base Flood Elevations (BFEs) or flood depths are shown. Lenders require mandatory flood insurance purchase requirements for insurable structures within this zone.

Developments may take place within a SFHA provided that the development complies with local and federal floodplain management ordinances. If the regulatory floodplain has a FEMA identified floodway and a development causes ANY rise in water surface elevations, then a Map Revision is required. However if the regulatory floodplain does not have a FEMA identified

floodway, then a Map Revision is only required if the project is impacting water surface elevations by more than 1 foot. A development may also choose to submit a Map Revision to reevaluate the properties flood insurance requirements. Please understand that City's ordinances prohibit any project from causing an adverse impact on adjacent neighbors. In other words, if the project's cumulative impacts are less than one foot, but cause an adverse impact on adjacent neighbors, the project will not be required to process a Map Revision, but will be required to mitigate for the adverse impacts to adjacent neighbors prior to permit approvals. Additionally, all proposed development within a regulatory floodplain must have the lowest adjacent grade of the structure be at or above the 100-year water surface elevation.

A Map Revision is FEMA's formal process in which a regulatory floodplain is updated and a property and/or structure is removed from the floodplain, thus not required to purchase flood insurance. Typically a map revision is a two staged process. The first stage occurs during the planning and design phase of a project and is referred to as a Conditional Letter of Map revision (CLOMR). A CLOMR is FEMA's formal review and comment on whether a proposed project complies with the minimum NFIP floodplain management criteria. NFIP maps (otherwise referred to as FIRMs) are based on existing, rather than proposed, conditions. Therefore, upon completion of the project and a formal approval of the CLOMR, a Letter of Map Revision (LOMR) is submitted to officially change the regulatory floodplain and/or floodway. It is important to understand that a CLOMR approval does not change the floodplain, it only provides assurance that the LOMR will be approved IF the project is built per the plans and specifications submitted with the CLOMR. The technical data needed to support a Map Revision (CLOMR/LOMR) request generally involve detailed hydrologic and hydraulic analyses. Per Oregon State Law, these calculations must be prepared by a qualified Oregon licensed engineer.

If the project is required to submit a Map Revision and FEMA's Community Acknowledgment Form is required, the City must certify that the project meets, or is designed to meet, the City's floodplain management requirements, the City is also required to certify that the project is in compliance with the Endangered Species Act (ESA). The ESA certification is new language that has been recently added to this form. Section 9 of the ESA prohibits anyone from "taking" or harming an endangered species. If an action might harm an endangered species, a permit is required from US Fish and Wildlife Service or National Marine Fisheries Service. Therefore, as a result of this new requirement regarding the ESA, in addition to the technical data, the City must now require information that shows compliance with the ESA.

Through working with FEMA and the City's participation in the NFIP, property owners in the City of Coos Bay are able to insure against flood losses. By employing wise floodplain management, the City can reduce risk and protect its citizens and our community against much of the devastating financial losses resulting from flood disasters. Careful local management of development in the floodplains results in construction practices that can reduce flood losses and the high costs associated with flood disasters to all levels of government.

This memo has been written to provide you with a brief overview of the requirements for upcoming projects that are located within the floodplain. There are several different types of FEMA Map Revisions and without knowing the specifics of individual projects it is difficult at this time to determine what requirements a future project will be subject to. However detailed information can be obtain through FEMA. Understanding that there is a great deal of information within this letter and there may be questions regarding the local and federal floodplain and floodway regulations, please do not hesitate to contact the City directly.