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October 15, 2012

FEMA  
Marijo Brady  
Denver Federal Center, Bldg. 710A  
P.O. Box 25267  
Denver, CO 80225-0267

RE: Proposed Floodplain Revisions  
Questions and Concerns

Dear Marijo,

Our County has some concerns about the new Floodplain Limits that are anticipated to go into effect sometime next year, and feel these should be addressed prior to adoption.

First, we have concerns with the "freckles" (floodplain islands) that are currently shown as out of the existing Floodplain limits that are being included in the proposed floodplain. In discussions with Atkins Global, we have been told that they were directed by FEMA to remove these "freckles" and include them in the proposed floodplain. We have not been able to get a clear definition of what a freckle is other than it is a small area. There are several issues with their definition and handling of these "freckles":

- 1) We feel that a freckle needs to be defined more clearly. There is a big difference between a high spot in somebody's pasture and an elevated area with a citizen's improvements constructed on it.
- 2) If people were shown to be above the floodplain elevation prior to the adoption of the current floodplain limits (1998), they were shown to be out on the current map. Prior to adoption of that map, there was not a LOMA process available for them to record that they were out. As a result they have no LOMA on record, and therefore must take the time and expense to re-prove that they are out of the floodplain. If there is previously determined data available, it should be included. A search for the data should be done, possibly with DNRC, who determined the current floodplain limits.

Another issue is with the handling of the levee/non-levee embankments (roadbeds and railroad beds). While these are not certified levees designed to hold back major flows of water, they are probably sufficient to hold back shallow depths of slow-moving water in the flood fringe as evidenced by the hydrology study that established these Base Flood Elevations (BFE's), did consider the embankments, and resulted in raised BFE's. Ignoring these embankments extends the flood fringe beyond the embankment and onto citizens' properties in an unreasonable and unlikely scenario. While we agree that it was correct to include these embankments in determining the BFE, we do not think it is accurate or fair to landowners to extend these "elevated" BFE's across the embankments widening the flood plain. Some backwater may travel through under-embankment culverts and bridges, but we think in many

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cases the BFE's should at least be lowered on the "dry" side of an embankment as they would actually go down if the impoundment failed and let the floodwaters spread out.

Many questionable areas have been found on the map where the contours do not support the area being within the floodplain, as well as areas shown out of the floodplain that appear that they should be included within the delineated floodplain. We have been told that "the elevations are not that accurate", and have an issue with the data being sufficiently accurate to include a landowner's property within the floodplain (when they appear to be out), but not accurate enough to exclude them from the floodplain. In either case, it is the same data being used. Also, rather than defining the accuracy by a chosen contour interval, the accuracy of the data should be defined by the accuracy of the raw data collected by the LiDAR process. The channels of the Bitterroot River have migrated in the time since the hydrologic study was performed, and the study that was used in establishing the BFE's for the current floodplain map may not be accurate enough to justify the conditions we are imposing on our property owners.

We have seen too many inconsistencies in the data and in the application of the data to have faith that we will be treating our property owners fairly if we adopt these proposed floodplain limits the way they are currently configured.

On Behalf of the Ravalli County Board of Commissioners,



Suzy Foss  
Chair, Ravalli County Commissioners  
215 S. Fourth Street  
Hamilton, MT 59840

cc: Correspondence File-General  
File



## Fax Transmittal

**To:** Sean McNabb 303 235-4849

**From:** Ravalli Floodplain Mgr

**Date:** October 29, 2012

**Ravalli County Planning Department**

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**Regarding:** Proposed Floodplain Revisions per Commissioner Letter Dated 10/15/12

**Comments:** Here is the letter as requested by Marijo Brady.  
3 pages including cover

## TRANSACTION REPORT

OCT/29/2012/MON 03:12 PM

FAX(TX)

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