


**Planning and Land Services Department
DEVELOPMENT ENGINEERING DIVISION POLICY**

Policy Number:	DE POL - 4010
Title:	Use of 2017 FIRMs as Best Available Information
Date:	November 14, 2016
Policy Sunset Date:	March 7, 2017
Management Approval:	Mitchell Brells 
Related Documents:	Title 18E.70

The following policy applies to Development Engineering Staff and is to be used in the Implementation of Title 18E.70 "Flood Hazard Regulations".

Policy:

Until such time that the 2017 Flood Insurance Rate Maps (2017 FIRMs) become effective it will be the department's policy that:

- 1. The 2017 FIRMs shall be used as an additional source of best available information, and**
- 2. For non-coastal flood hazard areas the department shall use the highest predicted base flood between the 1987 FIRM, 2017 FIRM or other accepted best available information.**
- 3. For coastal flood hazard areas the department shall use the 2017 FIRM or other best available information (such as an independent site specific flood study) to establish the regulatory base flood elevation.**
- 4. For coastal flood hazard areas the department shall stop using the highest tide level + wave risk methodology contained in section 18E.70.020.D, figure 18E.70-11, and figure 18E.70-12.**

Discussion/Background:

The County's authority to use best available information for regulatory purposes is located in section 18E.10.140.H.3 "Appendix A - Mapping Sources".

In many parts of the County the 2017 FIRMs are the best source of detailed flood information available. The use of this information helps further the purpose and intent of Title 18E.70 "Flood Hazard Areas" as stated in section 18E.70.10 "Purpose", such as minimizing damages from flood waters, protecting human life and health and reducing flood insurance rates. In some instances using the 2017 FIRMs may benefit a permit applicant by eliminating the need for a costly flood study.

Reviewers need to understand that the coastal flood hazard area base flood information contained in the 2017 FIRMs includes the effects of wind and waves, and this is why we no longer need to use 18E.70.020.D, figure 18E.70-11, and figure 18E.70-12.

Cautions/reminders to Reviewers:

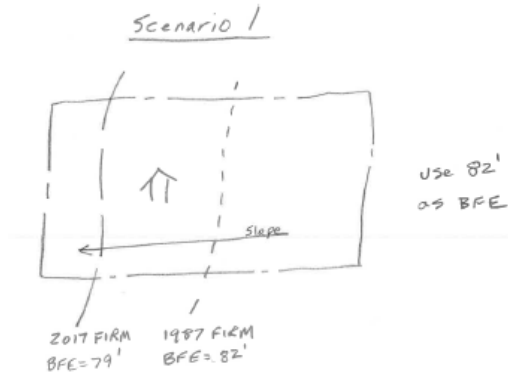
- *This policy is temporary and will sunset on the 2017 FIRM effective date (March 7, 2017).*
- *Implementation of the flood regulations is still complicated.*
- *This policy does not mean there is only one "map". The 1987 FIRMs are still effective until March 7, 2017. For example structures in a 1987 FIRM floodplain will still need an elevation certificate even if the 2017 FIRM shows that they are not in a floodplain.*
- *In some instances use of the 2017 FIRMs will mean that an applicant has to elevate their structure higher than the 1987 FIRMs would require.*
- *The 2017 FIRMs are not the only "best available information" that the County has or uses. For example we still use the NWH Flood Study information in certain areas of the County. As a more specific example, in many of the "Seclusion Areas" contained on the 2017 FIRMs we will be using the NWH Study as the best available information.*
- *The 2017 FIRMs do not include Pierce County's higher standards such as Deep and Fast, Channel Migration Zones, etc. These are all still in effect.*
- *Any structures located within a 100 year flood zone by nature of the 1987 FIRM or a flood elevation based on best available information will need an elevation certificate.*

What does this mean for an applicant?

- *In some cases it may be in their benefit to wait until the 2017 FIRMs become effective.*
- *In some cases it may be possible to go through a map change process with FEMA. Applicants should be directed to Dennis Dixon if they want to explore this option.*

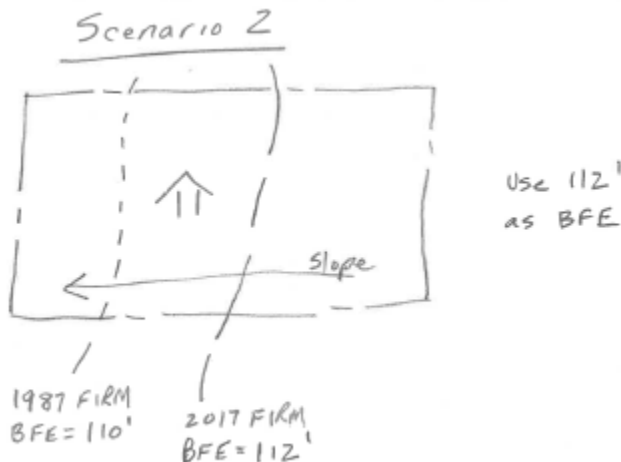
Some potential scenarios may help understand this policy:

Scenario 1: A structure within an area mapped as a floodplain in the 1987 FIRM in an AE zone with an elevation of 82 feet, but the 2017 FIRM shows the elevation to be 79 feet. How should this be handled? Since the 1987 FIRM is still effective until March 6, 2017 the applicant will have to use the 1987 FIRM elevation of 82 feet.

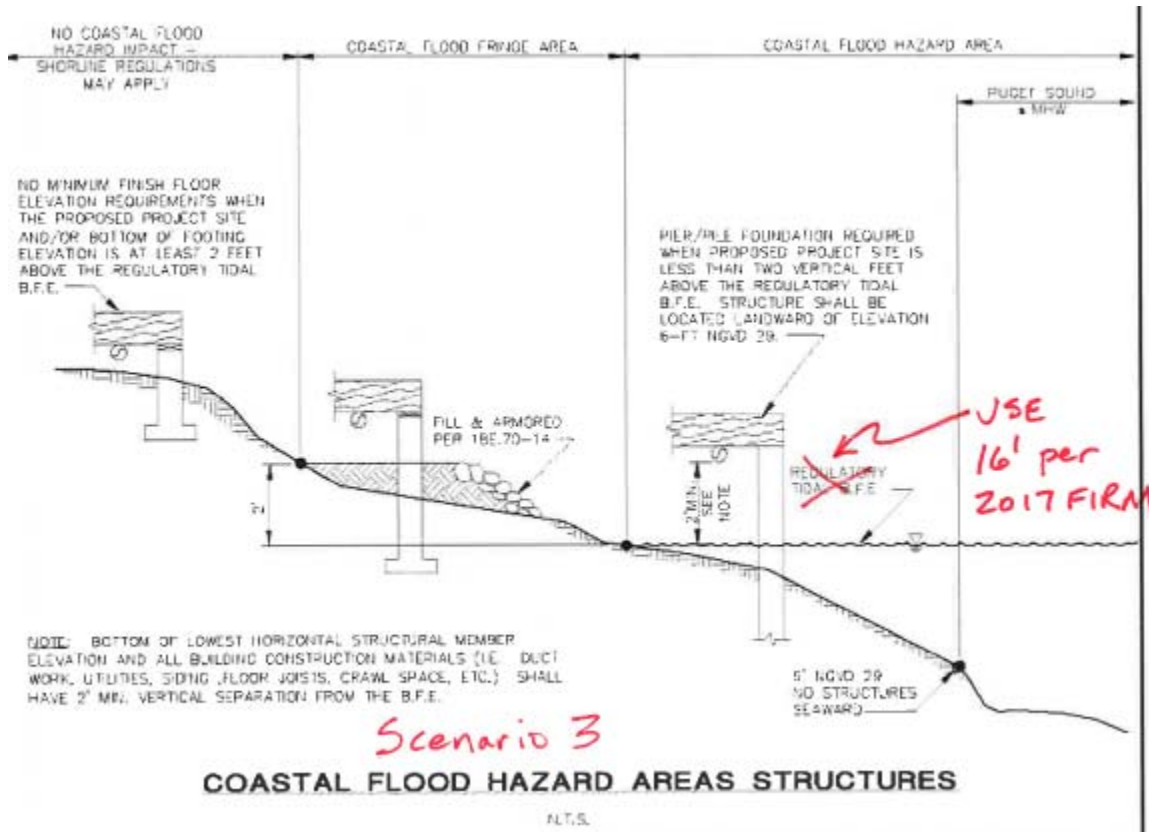


Since this is a studied area in the 1987 FIRM, FEMA will not accept a Letter of Map Revision – LOMR application unless it shows something different than the 2017 FIRM. Options are to wait until 3/7/17 or build using the 82 ft. elevation.

Scenario 2: A structure within an area mapped as a floodplain in the 1987 FIRM with an elevation of 110 feet, but the 2017 FIRM shows the elevation to be 112 feet. How should this be handled? Since the 2017 FIRM is considered the best available information the elevation the applicant will be required to use the 2017 FIRM elevation of 112 feet.



Scenario 3: A structure is proposed close to the coastal shoreline in Hale Passage. The 2017 FIRM shows that the location is a VE zone with an elevation of 16 feet. How should this be handled? Since the 2017 FIRMs are the best available information 16 feet should be used as the BFE.



Scenario 4: An applicant wants to hire an engineering firm to perform a site specific coastal flood study to try to obtain a lower BFE than what is shown on the 2017 FIRMs. How should this be handled? Since the 2017 FIRMs are not the effective FIRM maps until March 7 an applicant still has an opportunity to submit their own site specific study for review and approval. (It should be noted that most coastal areas become studied zones on March 7, which will mean that site specific flood studies will not be able to be used to lower the BFE.)

We should suggest the applicant submit their coastal study to FEMA for a Conditional letter of map revision – CLOMR. This will allow for consistent review of coastal hazards, an update to the FEMA map when constructed and for the property owner to maintain low cost flood insurance for the life of the building.

Scenario 5: An applicant has submitted their building permit in January of 2017. It is February 15 and the permit is still being reviewed. They are in an AE zone per the 1987 FIRM with a BFE of 82 feet. The 2017 FIRM shows that the BFE is lower (79 feet) and that they will not be building in the floodplain. Can they use the lower 2017 FIRM BFE of 79 feet and be relieved of the need and cost of an elevation certificate and other flood requirements?

As long as the 2017 FIRMs will be effective before they will need their building finalized they can jump to the 2017 FIRMs. However, while adoption of the 2017 FIRMs is imminent there could be a chance they are delayed for some reason (such as an appeal) so staff should touch base with their supervisor or manager to determine the current status before making this decision. The applicant should be made aware that a hold will be placed on the final of their building permit until the 2017 FIRMs become effective.