

Congress of the United States
Washington, DC 20515

December 13, 2013

The Honorable W. Craig Fugate
Federal Emergency Management Agency
500 C Street, SW
Washington, D.C. 20472

Dear Administrator Fugate:

In an effort to continue our advocacy on behalf of the many residents that have been living in our coastal communities for generations, we request your immediate assistance in addressing concerns over the Federal Emergency Management Agency's (FEMA) new flood maps for Massachusetts.

Though the Biggert-Waters National Flood Insurance Reform Act of 2012 (Biggert-Waters) aimed to improve the actuarial soundness of the National Flood Insurance Program and introduce important reforms, significant unintended consequences have arisen throughout implementation. Having heard from numerous homeowners that have seen their premiums rise dramatically due to change in flood zone determination, we have grave concerns that absent reconsideration of FEMA's flood zone maps for Massachusetts, many homeowners and business owners are potentially facing unfair and unaffordable rate increases.

It has come to our attention that the new flood maps being enlisted to predict coastal flood levels for Massachusetts were implemented using a potentially inaccurate methodology for our region. Unfortunately, these new maps serve as a directive for much more expensive flood insurance rates for many residents and business owners. The attached supporting documents, from an independent review by scientists and engineers from the University of Massachusetts Dartmouth School for Marine Science and Technology and Applied Coastal Research and Engineering, Inc., indicate that the broad application of the methodology used by FEMA in determining the development of the 2013 flood maps appears to have been inappropriate for our geography.

Specifically, FEMA used a model called Direct Integration Method (DIM) to determine "wave setup," a phenomenon where water levels along a coastline are elevated due to breaking waves pushing water against the shore. It is our understanding that this model was created to meet specific needs of the Pacific Coast, including very long wave periods, and where storm surge is not significant. On the East Coast, storm surges tend to govern storm damage and the shorter wave periods do not generate wave setup similar to the Pacific Coast. According to the independent review, the effect of using a simplified wave setup methodology, rather than more sophisticated (physics-based) tools to predict the level of flooding, yields overly conservative results, unnecessarily adding more families to the flood maps.

Using potentially incorrect technology or data, FEMA has encumbered residents and business owners with faulty insurance premiums that can reach as high as \$18,000 to \$50,000 in some

parts of the Commonwealth. Given the significance of this economic impact on families and businesses it is imperative that FEMA work swiftly to address these concerns.

In light of the new evidence regarding the incorrect methodology, we ask that FEMA work closely with us to take a number of steps:

1. We ask that you work with us on a remedy to amend the Commonwealth's flood maps utilizing the correct methodology for our geographic region.
2. We ask that you put in place a complete suspension of the new flood maps until a decision is made to amend them.
3. **We also ask that you notify us in writing by (February 1, 2014) of FEMA's proposed plan, including a draft timeline, to rectify flood maps for the Commonwealth.** We hope that your office will keep our staff regularly apprised of the agency's progress in this regard.

Simply put, we must get the maps right. The economic livelihood of the people of Massachusetts depends on it. Thank you for your prompt attention to this important issue.

Sincerely,



William R. Keating
Member of Congress



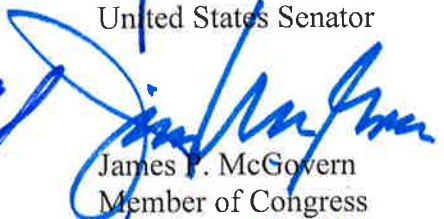
Elizabeth Warren
United States Senator



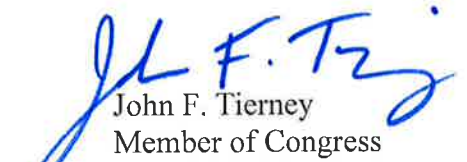
Edward J. Markey
United States Senator



Richard E. Neal
Member of Congress



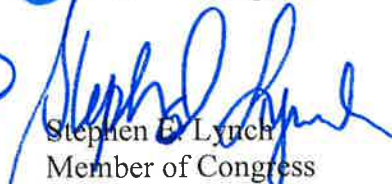
James P. McGovern
Member of Congress



John F. Tierney
Member of Congress



Michael E. Capuano
Member of Congress



Stephen F. Lynch
Member of Congress



Niki Tsongas
Member of Congress



Joseph P. Kennedy, III
Member of Congress

Enc: University of Massachusetts Dartmouth School for Marine Science and Technology and Applied Coastal Research and Engineering, Inc., Technical Memo, 12/03/13