

BOARD OF SELECTMEN
600 Chief Justice Cushing Highway
Scituate, Massachusetts 02066
Telephone (781) 545-8740
Fax (781) 545-8704



TOWN OF SCITUATE
www.scituatema.gov

TOWN ADMINISTRATOR
Patricia A. Vinchesi
Telephone (781) 545-8741
pvinchesi@scituatema.gov

December 4, 2015

Federal Emergency Management Agency
Region I99 High Street, 6th Floor
Boston, MA 02110-2320
Attention: Kerry Bogdan

Dear Ms. Bogdan:

The Town of Scituate, Massachusetts is providing comments on revised FEMA maps provided to our community on November 9, 2015 via the attached.

Please contact me if you require any further information.

Sincerely,
TOWN OF SCITUATE
Patricia A. Vinchesi
Patricia A. Vinchesi
Town Administrator

PAV/tv



December 5, 2015

Federal Emergency Management Agency (FEMA)
Region I
99 High Street, 6th Floor
Boston, MA 02110-2320
ATTN: Kerry Bogdan

Sent via US Mail and Email: Kerry.Bogdan@fema.dhs.gov

Re: Comments Regarding Appeal Resolution and Revised Preliminary 2015 FIS and FIRMs for Town of Scituate, Plymouth County, MA, Community No: 250282

Dear Ms. Bogdan,

Acting on behalf of the Town of Scituate, the Woods Hole Group is submitting this comment letter in response to FEMA's appeal resolution letter on the Preliminary Flood Insurance Study (FIS) and Flood Insurance Rate Maps (FIRMs) for Plymouth County, MA dated May 1, 2013. The Town of Scituate feels that the appeal resolution process was successful in revising portions of the Preliminary 2013 FIRMs to more accurately reflect flood hazard risks. However, through submittal of this comment letter the Town is asking FEMA to delay issuance of the Letter of Final Determination (LFD) so the Town can collaborate and/or consult with FEMA consistent with 44 CFR 67.8(b) on further improvements to the FIRMs. The justification for this request is described more fully below.

As requested by FEMA, on behalf of the Town, the Woods Hole Group used the 30-day comment period to review the Revised Preliminary maps to verify that the updated flood hazard data for the appeal resolution was satisfactorily incorporated into the flood maps. The October 16, 2013 appeal included engineering analyses, modeling, and remapping at two (2) transects in the Town of Scituate (Transects PL-32 through PL-35). The appeal also requested revisions to the 1% annual chance SWELs at the following twenty-two (22) transects in the Town (Transects PL-31, PL-31, PL-33, PL-34, PL-36 through PL-51, PL-53, and PL-54). As the original analyses conducted during the appeal period were constrained by time, the Town in consultation with the Woods Hole Group, selected transects which most clearly evidenced areas of the town requiring revision.

Since revisions to the 1% annual chance SWELs required FEMA to perform additional engineering analyses, modeling, and flood hazard mapping, the Woods Hole Group review included an evaluation of all components of the revised flood study at the twenty-two (22) transects. This letter provides comments on the Woods Hole Group review of the Revised Preliminary maps and supporting data, conducted within the 30-day comment period.

The following data and information were obtained and reviewed during the evaluation:

- FEMA appeal resolution letter dated November 6, 2015 and received by the Town on November 9, 2015.
- Revised Preliminary FIRM panels dated November 6, 2015 received by the Town on November 9, 2015.
- FIRM database containing GIS shapefiles dated November 6, 2015 downloaded from the FEMA Map Service Center web site.
- Modeling files and engineering summaries provided on November 11, 2015.

The following findings were made during review of the above data and information:

Finding #1: The Revised Preliminary 2015 FIRMs incorporate changes to the flood zones and base flood elevations (BFEs) in the areas around Transects PL-32 and PL-35 as requested in the appeal letter.

Finding #2: Revisions to the 1% annual chance SWEL were made at Transects PL-31, PL-31, PL-33, PL-34, PL-36 through PL-51, PL-53, and PL-54 as requested in the appeal letter. Subsequent engineering analyses, modeling, and flood hazard mapping was performed by FEMA at these transects.

Finding #3: Significant differences in BFEs exist on the Revised Preliminary 2015 FIRMs between the areas studied in detail by Woods Hole Group as part of the appeal (Transects PL-32 and PL-35) and the remaining areas in Scituate. These differences are most notable in the estuarine and inland portions of the floodplain, and are reflective of differences in the methods in which wave setup was applied. An example map showing differences in BFEs is provided in Figure 1.

Because of the significant differences in BFE, which would result in disproportionate impacts to flood insurance premiums and building requirements for property owners, it would appear not only fair and non-discriminate, but critically important to employ a consistent methodology when accounting for the effects of wave setup across the transects. It follows that if the Town's appeal was accepted (as it was), then revisions would be necessary to other transects particularly in the estuarine portions and inland portions of the floodplain.

To that end, the Town of Scituate is committed to devoting the resources needed to work with FEMA to apply a consistent methodology throughout the town that will result in maps that accurately and consistently reflect flood hazard risks to the

greatest degree possible. The Town would like time to consult and collaborate with FEMA on this issue, and as a result respectfully requests that issuance of the LFD be delayed so this important work can take place. Our basis for this request relies on 44 CFR 67.8(b) which allows FEMA to resolve appeals through consultation with local officials.

While the Town of Scituate understands that map revisions could also be requested through the Letter of Map Revision (LOMR) process once the FIRMs become effective, it prefers to address the methodology differences that have resulted in varying BFEs at this earlier stage since it would appear to accrue a number of benefits. These include but are not limited to, the facilitation of a final and expedited resolution of the appeal, address existing concerns and comments of both the Town and property owners through careful review, obviate the need for a LOMR or further proceedings with FEMA, and assist in the vital importance of securing approval of the Revised Preliminary 2015 FIRMs at a future town meeting.

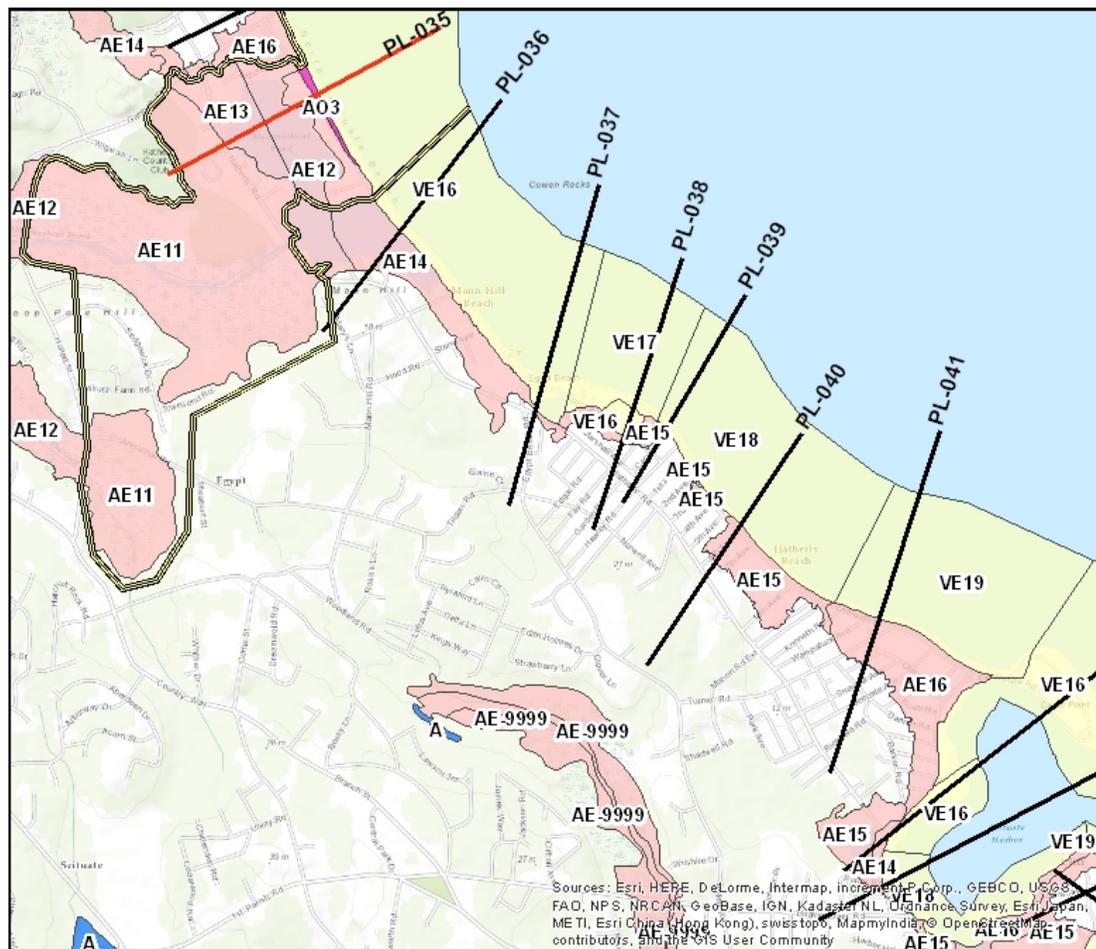


Figure 1. Example map showing differences in AE Zone BFEs along the inland edge of the floodplain. Transects evaluated by Woods Hole Group in the appeal are shown in red and Transects revised by FEMA are shown in black.

Finding #4: In some locations the flood zones and/or BFEs shown on the Revised Preliminary 2015 FIRMs do not follow the revised engineering analyses and modeling results prepared by FEMA. Adjustments to the mapping can be explained in some areas where tie-ins were needed to transition the flood hazard zones and BFEs into the revised mapping accepted as part of the appeal. In other areas, however, differences between the engineering analyses and modeling results, and the revised flood hazard mapping are harder to explain. A summary of these mapping related comments is provided below.

- Comment 1 - The flood zone boundaries and/or BFEs do not match the WHAFIS results. While some differences may be due to tie-ins with neighboring transects, this does not appear to be the case for all situations. *Identified at Transects PL-30, PL-42, PL-43, PL-45, PL-46, PL-49, PL-51, as well as PL-52 and PL-53 (which span Scituate and Marshfield).*
- Comment 2 – The upland edges of the floodplain do not follow the appropriate contour. *Identified at Transects PL-30, PL-31, PL-33, PL-34, PL-37, PL-38, PL-42, PL-43, PL-46, and between PL-48 and PL-49.*
- Comment 3 – VE zone mapped based on wave breaking criteria rather than wave runup. *Identified at Transect PL-39.*
- Comment 4 – The VE Zone boundary and/or BFE is not consistent with the mapping guidelines for a wave overtopping splash zone. *Identified at Transects PL-40 and PL-50.*
- Comment 5 – The flood zone mapping and/or BFE is not consistent with the mapping guidelines for a wave runup dominated transect. *Identified at Transects PL-30, PL-34, PL-39, PL-42, and PL-47.*
- Comment 6 – Flood zone mapping and BFEs for the North River estuary not supported by modeling at *Transect PL-51 or PL-52.*

The Town of Scituate looks forward to continued consultation and collaboration with FEMA towards successful resolution of the appeal and development of accurate flood hazard information as reflected on the FIRMs. The Town has made a good faith effort to review and provide comments on the revised Preliminary FIRMs and reserves the right to clarify and/or supplement its comments contained in this letter as work with FEMA continues to revise the Town's flood zone maps.

Thank you for your time and consideration.

Sincerely,

Leslie Fields

M. Leslie Fields
Sr. Coastal Geologist/Project Manager, CFM
Woods Hole Group, Inc.

cc: Patricia Vinchesi, Scituate Town Manager
Attorney Robert Galvin

www.woods holegroup.com

FAX: 508.540.1001

TELEPHONE: 508.540.8080

Woods Hole Group 81 Technology Park Drive E. Falmouth, MA 02536 USA