



FEMA

April 26, 2022

Rick Fancher
Executive Director, Metro East Sanitary District
1800 Edison Avenue P.O. Box 1366
Granite City, IL 62040

Dear Mr. Fancher:

This letter is written pursuant to the compliance review performed by the U.S. Department of Homeland Security's Federal Emergency Management Agency (FEMA) of various levee compliance documents received for the East St. Louis and Vicinity Flood Protection Project Levee System in Madison and St. Clair Counties, Illinois. The East St. Louis and Vicinity Flood Protection Project Levee System (National Levee Database System ID: 5605300001) is comprised of two segments: the Chain of Rocks East Levee segment operated and maintained by the U.S. Army Corps of Engineers (USACE), St. Louis District and the Metro East Sanitary District (MESD) segment operated and maintained by the MESD.

In April 2019, FEMA Region 5 sent a letter to the USACE, St. Louis District addressing the receipt of the Quantitative Risk Assessment and as-built plans for the East St. Louis and Vicinity Flood Protection Project Levee System submitted by the USACE, St. Louis District under 44 CFR Subsection 65.10(e). USACE recommended accreditation of the East St. Louis and Vicinity Flood Protection Project Levee System and this recommendation was accepted by FEMA.

The FEMA letter also noted that additional coordination with levee stakeholders was needed to obtain documentation to clarify 44 CFR Section 65.10(b)(6) Interior drainage and address 44 CFR Section 65.10(c) Operation plans and criteria, and 44 CFR Section 65.10(d) Maintenance plans and criteria for the East St. Louis and Vicinity Flood Protection Project Levee System.

Through additional coordination among FEMA, USACE and MESD, clarification of the interior drainage submittal was obtained during a call on December 7, 2021. MESD also submitted information to address maintenance, operation, emergency preparedness plan adoption, and certification requirements for the MESD levee segment under 44 CFR 65.10 (c) and (d) on January 14, 2022 and March 16, 2022.

FEMA performed a compliance review of all data submitted. Based on FEMA's compliance review, all applicable requirements to reflect accreditation have been met for the East St. Louis and Vicinity Flood Protection Project Levee System.

In response, FEMA plans to recognize the East St. Louis and Vicinity Flood Protection Project Levee System as accredited on the future *Preliminary* Flood Insurance Rate Map (FIRM) for Madison and St. Clair Counties, Illinois. Flood hazard areas landward of this system will be

mapped as areas of moderate flood hazard, or Zone X (shaded). Interior drainage areas will be mapped as Special Flood Hazard Area (Zone A, AO, AE, AH). An updated levee system accreditation note will be placed to designate areas of reduced flood risk due to levee on the FIRM panel(s). FEMA accreditation of a levee system does not guarantee that the levee will provide flood hazard reduction to properties from flooding; therefore, FEMA has included a note on related FIRM panels that overtopping or failure of an accredited levee system is possible.

FEMA retains the right to revise these designations upon indication of changing condition of the flood hazard or the levee infrastructure. Future map updates will require the levee system to be evaluated at such time; design, construction, operation, and/or maintenance documents may be requested at any time; and deviations from this documentation could result in the levee system no longer being mapped as accredited on a future FIRM.

It is important to note that levee systems are only designed to provide a specific level of flood risk reduction. They can be overtopped or fail in larger flood events. When levee systems do fail, the consequence of failure can be catastrophic. Also, levee systems require regular maintenance and periodic upgrades to retain their level of flood risk reduction. For these reasons, FEMA encourages communities that rely on levee infrastructure to be especially proactive in making property owners aware of residual flood risk and steps available for mitigation.

The NFIP was created to reduce flood damages by identifying flood risks, encouraging sound community floodplain management practices, and providing flood insurance to lessen the financial impact of flood damage. Through the NFIP, property owners in participating communities are able to insure against flood losses.

FEMA recognizes the dedication of MESD, USACE and other levee stakeholders to identify, communicate, and address the risks associated with living and working landward of the East St. Louis and Vicinity Flood Protection Project Levee System, and we look forward to our continued partnership. FEMA will engage with communities on next steps as *Preliminary* FIRMs are issued later this summer, and we will provide resources to better understand the relationship between levees and flood risk. The FEMA lead for the Madison and St. Clair County map updates is John Wethington. Mr. Wethington may be contacted by phone at (312) 485-5485, or by email at john.wethington@fema.dhs.gov. Please do not hesitate to contact the Region 5 office if you have any questions.

Sincerely,



Mary Beth Caruso
Director, Mitigation Division
FEMA Region 5

All “cc” communications delivered by electronic correspondence.

cc:

Mr. Curtis McCall Sr, Mayor, City of Cahokia Heights
Mr. Mitch Bair, City Manager, City of Collinsville
Mr. Robert Eastern III, Mayor, City of East St. Louis
Mr. Kevin Head, City Administrator, City of Edwardsville
Mr. Mike Parkinson, Mayor, City of Granite City
Mr. John W. Hamm III, Mayor, City of Madison
Mr. Tyrone Echols, Mayor, City of Venice
Ms. Vera Glasper Banks, Mayor, Village of Brooklyn
Mr. G.W. Scott Sr, Mayor, Village of Caseyville
Mr. Mike Suarez, Village of Fairmont City
Mr. Jamie Bowden, Village Administrator, Village of Glen Carbon
Mr. Bill Robertson, Mayor, Village of Harford
Mr. Mike Pagano, Mayor, Village of Pontoon Beach
Mr. Richard Sauget Jr, Mayor, Village of Sauget
Ms. Barbara Overton, Mayor, Village of South Roxana
Mr. Leonard Moore, Village of Washington Park
Ms. Anne Markezich, St. Clair County, NFIP Coordinator
Mr. Steve Brendel, Madison County, NFIP Coordinator
Mr. Charles Etwert, Chief Supervisor, Southwestern Illinois Flood Prevention District Council
Mr. Randy Cook Jr., Senior Civil Engineer, Wood Environment & Infrastructure Solutions, Inc.
Mr. David Busse, Levee Safety Officer, Chief, Eng. and Construction Division, USACE, St. Louis District
Ms. Tracey Kelsey, Project Manager, USACE, St. Louis District
Ms. Amanda Goltz, Levee Safety Program Manager, USACE, St. Louis District
Ms. Marilyn Sucoe, Acting NFIP State Coordinator, Illinois Department of Natural Resources
Ms. Suzanne Vermeer, FEMA Headquarters
Mr. Dan Shulman, External Affairs, FEMA Region 5