June 4, 2009

Honorable Norm Dicks Chairman  
Honorable Mike Simpson, Ranking Minority Member  
House Appropriations Subcommittee on Interior, Environment and Related Agencies  
2363 B. Rayburn House Office Building  
Washington, D.C. 20515

RE: Support for Updating Hydrologic Bulletin 17B

Dear Mr. Chairman and Ranking Member Simpson:

The Association of State Floodplain Managers (ASFPM) is a national, non-profit, professional membership organization whose 14,000 members represent floodplain managers from across the U.S. and beyond. Our 28 State Chapters represent 30 states, and are composed of the professionals who do the job “on the ground” to make flood loss reduction a reality at the state and local levels. Our members rely on technical data and tools that must accurately reflect the flood hazard. One of these tools is a procedure for statistical analyses of streamgage data to identify the frequency and magnitude of flood discharges.

Bulletin 17B, *Guidelines For Determining Flood Flow Frequency*, (Interagency Advisory Committee on Water Data, 1982) is used extensively and required by Federal agencies, such as the Federal Emergency Management Agency, for flood studies and preparation of flood hazard maps. However, almost thirty years have passed since parts of Bulletin 17B were assembled in response to the administration's and congress's (House Document No. 465) concern for the development of uniform procedures for flood frequency analysis. As stated in the FOREWARD of Bulletin 17B, “An accurate estimate of the flood damage potential is a key element to an effective, nationwide flood damage abatement program.” Motivation for national flood frequency guidelines was to reduce flood damages. Also stated in the FOREWARD, “This present revision is adopted with the knowledge and understanding that review of these procedures will continue. When warranted by experience and by examination and testing of new techniques, other revisions will be published.”

It is well past time that this important tool was reviewed and updated to take advantage of advancements in analyses and intervening years of discharge data collection.
The Hydrologic Frequency Analysis Work Group (HFAWG) was formed in December 1999 to recommend procedures to increase the usefulness of the current guidelines for Hydrologic Frequency Analysis computations (e.g., Bulletin 17B) and to evaluate other procedures for frequency analysis of hydrologic phenomena. The update work does not have a dedicated budget; therefore work is proceeding slowly on a voluntary basis with an uncertain completion date.

ASFPM fully supports and encourages the effort to update Bulletin 17B. We believe the HFAWG has made significant progress under trying conditions. Therefore, we encourage you to support the creation of a dedicated budget to ensure that work on this critical update is completed in a timely fashion. This update will help to ensure that new maps created by FEMA delineating our nation’s floodplains properly reflect the true risk of flooding.

Thank you for considering this important request.

Al Goodman, CFM
Chair, ASFPM

CC
Hon. Ken Salazar, Secretary of Interior
Hon. Tom Strickland, Deputy Secretary of Interior
Dr. Suzette Kimball, Acting Director, U.S. Geological Survey
Hon. Peter Orszag, Director, Office of Management and Budget

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