

September 15, 2007

Clerk, Illinois Pollution Control Board
James R. Thompson Center
100 W. Randolph
Suite 11-500
Chicago, Illinois 60601
Via FAX 312/814-3669

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SEP 17 2007

STATE OF ILLINOIS
Pollution Control Board

PC#19

Re: PCB 2007-084 North Milam

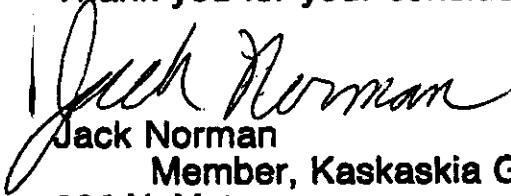
Enclosed is a copy of a three-page memo on "Levee and Flood Control Issues in Illinois", from the staff of East-West Gateway Council of Governments to its Board of Directors

The memo was apparently distributed September 11 in their Meeting Packet to prospective attendees at the coming (September 18) EWGCC Executive Advisory Meeting. A copy was forwarded to me, and received here in today's mail.

This memo further illuminates the subjects considered at the August 15 Illinois Levee Summit, material from which I have mailed to you two days ago, in part, and the rest today.

The memo asserts that "five levees in the Metro East are at risk of failing due to structural deficiencies", and that the coming "map revision will determine which homes and businesses will be potentially subject to flooding", even though "protected" by those levees.

Thank you for your consideration.



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Post-It™ Fax Note	7671	Date	9/15/07	# of pages	4
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EAST-WEST GATEWAY
Council of Governments

Creating Solutions Across Jurisdictional Boundaries

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Memo to: Board of Directors
From: Staff
Subject: Levee and Flood Control Issues in Illinois
Date: September 11, 2007

Under Congressional authorization, the Federal Emergency Management Agency (FEMA) is revising all flood risk maps for base flood levels – the 100 year flood -- or a flood with a 1% chance of occurring in any given year – under a new federal regulation 44 CFR 65.10. The new federal regulation requires FEMA to ascertain whether flood hazard areas meet standards for adequate protection from catastrophic floods. Maps for the Metro East will be completed sometime in the next couple of months. These new maps are based on engineering evaluations of levees and other flood control facilities done by the Corps of Engineers. Following the completion of the maps, there will be a series of public meetings. It will take about a year before the maps are finalized.

At a recent meeting with FEMA and the Corps of Engineers, Levee Districts and other local officials learned that five levees in the Metro East are at risk of failing due to structural deficiencies in the levees. These levees extend from Wood River south to Prairie Du Pont and Fish Lake. Most of the American Bottoms from the Mississippi River to Bluff Road is at risk.

The map revision will determine which homes and businesses will be potentially subject to flooding and therefore required to buy costly flood insurance. The probability of levee decertification will cause massive costs to existing individuals and businesses and cripple economic growth and investment in our region.

This potential action will affect almost a third of the population of the Illinois portion of the St. Louis area and many critical businesses that are the foundation of our local economy. The consequences will be felt not only by areas that could be in jeopardy of flooding, but also by all communities that have a stake in the economic vitality of our region.

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Table 1
Demographics of Affected Area

	People	Households	Jobs
Madison County	78,981	32,055	33,241
Monroe County	70	32	250
St. Clair County	77,230	27,020	18,048
Total	156,281	59,107	51,539

Additionally, 4000 business establishments face heightened risk due to deficiencies in the levees. In the 2000 Census, of the 59,107 occupied housing units in the affected area, 38,441 (65%) were owner-occupied, and 20,666 were rental units. Of all owner-occupied units, 43% do not have a mortgage. These units would be exempt from the federal mandate to purchase flood insurance, but they would all benefit from having insurance in case of a disastrous flood.

Levee Improvement

This region represents the second largest concentration of population in the Mississippi Corridor (after New Orleans) and a collaborative effort should be successful in obtaining the funds necessary to improve the levees.

The Corps of Engineers describe their goal as to "Assess, Communicate Risk, and Solve" the problem. Their risk analysis looked at design height and under-seepage problems. It is the under-seepage, plus old pumps and drainage tiles (Wood River Levee built 1938) that led the Corps to determine the levees are not adequate and need repair to be certified. The Corps of Engineers is still working to define actual costs to improve the levees, but costs could range from \$50-100 million. Current policy of the federal government is that all Corps projects require a 35 percent local match.

Flood Insurance

FEMA in Region V, Chicago, is focused on the importance of flood insurance as a means of managing that risk and advised that flood insurance will soon be mandatory. When the FEMA maps are finalized (a year to a 18 months from now), property in flood risk areas will be required to have federal flood insurance if it has a mortgage from a federally regulated institution. Because the property is still officially behind a protected levee, flood insurance purchased now (and over the next year before map finalization) is significantly less expensive than it will be once the maps are finalized. FEMA rules also allow for the 'grandfathering' of insurance rates, so that people who buy insurance before the

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new maps are final will be able to continue to hold the insurance at a significantly reduced rate, while new rates will be expected to rise 400 percent (or more) since the land will be considered not protected.

Public Meetings

FEMA and Congressman Costello have requested assistance of Council staff in reaching the metro East Communities with information about flood risk and flood insurance. The St. Louis District of the Corps of Engineers has requested assistance from East-West Gateway for a Levee Summit to address similar concerns with Missouri Levees.

In response these requests, Chairman Kern is convening a meeting of elected officials in the three Illinois counties on September 29 at Southwestern Illinois College in Belleville, where representatives of FEMA Region V and the St. Louis District of the Corps of Engineers will be present to provide more information.

In the months ahead, staff will be working with local officials, our congressional delegation and federal officials to identify a strategy to constructively address these serious flood control issues. That strategy could included insuring that local levee districts have adequate funding to repair levees and other facilities to meet Corps standards as well as actions to mitigate the fiscal and other effects of the revised flood maps.