



Office of the Director

Federal Emergency Management Agency

Washington D.C. 20472

June 9, 2000

The Honorable John S. Street
City Hall, Room 215
Philadelphia, PA 19107

Dear Mayor Street:

I am writing to express my concerns about the applications for variances from the floodplain ordinance of the City of Philadelphia that are currently before the zoning board in connection with the redevelopment proposals for Venice Island in the Schuylkill River. As you know, the island lies in the floodway of the river, the portion of the river that carries the most forceful and deep floodwaters during flooding events.

As you know, FEMA is intensely engaged in encouraging communities around the country to take steps to reduce their vulnerability to flooding. In Pennsylvania, as elsewhere, our mitigation program is providing federal funds to help relocate houses and businesses out of the floodplain to higher, safer ground. I view with alarm the possibility that Philadelphia would move in the opposite direction, allowing for new residences to be constructed in the floodway, in defiance of the exemplary floodplain ordinance the City adopted 20 years ago.

I urge you to ensure that the following considerations are taken into account in determining whether the development proposals should be approved. First, Philadelphia would be knowingly approving the location of residences in an area where future flooding is a certainty. The City should recognize its potential legal liability for allowing construction of residences where the possibility of future loss of life and property is not only possible, but likely. Secondly, Philadelphia's continued eligibility for the National Flood Insurance Program could be jeopardized by approval of these projects if the technical basis on which they are deemed to meet federal standards is unsound.

The newspaper series which recently ran in the Philadelphia Inquirer, "Crisis on the Coast" graphically illustrates the fact that allowing more building in high hazard areas, now, subjects future taxpayers to an even heavier burden than they already face. This is not only the case with federal taxpayers. City residents absorb the burdens associated with flood emergencies, such as evacuation, rescue and temporary shelter. I hope our agency and the City of Philadelphia can partner in seeking ways to stem the increases in flood disaster vulnerability.

Sincerely,

James L. Witt
Director