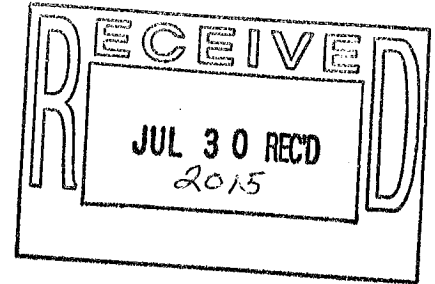




DEPARTMENT OF THE ARMY
BALTIMORE DISTRICT, U.S. ARMY CORPS OF ENGINEERS
P.O. BOX 1715
BALTIMORE, MD 21203-1715

June 26, 2015

Engineering Division



Mr. William Wright
Department of Streets, Parks, & Flood Control
Public Services Building
1550 West Third Street
Williamsport, Pennsylvania 17701

Dear Mr. Wright:

This letter is to formally notify you of the routine inspection rating for the Flood Risk Management Systems (FRMS), located in Williamsport, Pennsylvania. The U.S. Army Corps of Engineers (USACE), Baltimore District, performed the Routine Levee inspections on September 16-17, 2014. The Northeast Williamsport and Northwest Williamsport systems received an overall system rating of **Unacceptable**. Please refer to the enclosed inspection reports for the details on the system ratings and comments on individual system features.

There are a variety of items which have been noted as deficiencies and need to be rectified. In the Northeast Williamsport FRMS, individual items receiving **Unacceptable** ratings were culverts/discharge pipes, relief wells, and unwanted vegetation growth along the levee. In the Northwest Williamsport FRMS, individual items receiving **Unacceptable** ratings were culverts/discharge pipes and relief wells. Vegetation in non-compliance with the vegetation-free zone as described in ETL1110-2-583 has warranted the above **Unacceptable** ratings for one of these items. Although vegetation is not used to determine eligibility for PL84-99 using the interim policy, the sponsor should confirm the system's easement and continue in their efforts to establish the vegetation-free-zone in order to reduce the risk of adverse performance of the system during a flooding event. Please refer to the enclosed inspection reports for other deficiencies noted during the routine inspections. USACE will work with you to prioritize required maintenance items to minimize risk.

The **Northeast and Northwest Williamsport FRMS do not meet the eligibility criteria for rehabilitation assistance as associated with PL84-99**. USACE memorandum entitled "Interim Policy for Determining Eligibility Status of Flood Risk Management Projects for the Rehabilitation Program Pursuant to Public Law PL84-99" dated March 21, 2014; was used to determine eligibility (see enclosed checklist). Within the Northeast and Northwest Williamsport FRMS, individual items of concern that arose when applying the interim eligibility policy included the culverts/discharge pipes and relief wells rated items which were rated **Unacceptable**. These individual items are

considered **Unacceptable** due to the lack of inspection records for the culverts/discharge pipes and absence of conditional assessments (pump testing records) of the relief wells. Although the sponsor has recently sounded the relief wells, the specific capacity of the wells needs to be defined, analyzed, and remediated (if necessary), to ensure the system functions as intended during the next flooding event. Similarly, the conduits need to be thoroughly inspected and the condition defined, analyzed, and remediated (if necessary) to minimize the risk of adverse performance during the next flooding event. These two rated items for each of the systems has resulted in overall **Unacceptable** system ratings. For this reason, the sponsor is urged to continue with their current efforts to address the culvert inspections and relief wells as soon as possible. The complete policy is available online and can be accessed via the following link:

<http://www.iwr.usace.army.mil/Portals/70/docs/frmp/Interim Policy for Rehabilitation Program 21March2014 FINAL.PDF>.

As the project sponsor, the City of Williamsport may choose to enter the System-Wide Improvement Framework (SWIF) process to regain eligibility for PL84-99 rehabilitation assistance. Submitting a SWIF is a two step process, a letter of intent (LOI), followed by submission of a SWIF plan. Once an LOI is approved by USACE, the system will be conditionally eligible for PL-84-99 assistance and the Sponsor will have up to two years to formulate a SWIF. A SWIF provides you, the sponsor, with the opportunity to transition the system over time to USACE standards. Alternatively, once approved corrective measures are performed, USACE can re-inspect the Williamsport systems as soon as feasible to fully reinstate eligibility in the Rehabilitation Program. The complete policy for development and implementation of System-Wide Improvement Frameworks is available online and can be accessed via the following link:

<http://www.iwr.usace.army.mil/Portals/70/docs/frmp/SWIF 2011-11-29.pdf>.

The USACE Levee Safety Program provides continuous feedback about levee systems and their reliability through rigorous inspections and assessments. Public safety is paramount in the USACE Levee Safety Program. These inspections provide a detailed and consistent assessment of the overall condition of the flood risk management system with the goal that deficiencies can be identified and remedial actions can be considered to reduce the risk to the adjacent communities. Additionally, effective July 31, 2014, a new policy for processing requests to alter USACE Civil Works Projects pursuant to 33 USC 408 has been enacted. This policy previously referred to as the "408 Modifications Process", Engineering Circular (EC) 1165-2-216 is available online and can be accessed via the following link:

<http://www.publications.usace.army.mil/Portals/76/Publications/EngineerCirculars/EC1165-2-216.pdf>.

Please note that it is incumbent upon you, in accordance with the Operation & Maintenance Manual (O&M) to ensure the Williamsport project is continuously maintained and operated to obtain the maximum benefits and ensure serviceability.


Per the O&M Manuals you are required to perform routine inspections to determine if there are other project deficiencies.

Regarding levee certification, the Federal Emergency Management Agency (FEMA) is responsible for the National Flood Insurance Program (NFIP). It is the flood risk management system sponsor's responsibility to provide documentation to FEMA demonstrating that a system meets the NFIP requirements. FEMA will make the final determinations on NFIP eligibility. For further information pertaining to levee certification the sponsor should contact FEMA.

We have provided a copy of this letter to FEMA Region III, the State of Pennsylvania Emergency Management Agency, the Lycoming County Emergency Management Agency, Congressional Representatives, and the City of Williamsport. The overall system ratings will also be available to the public via the USACE National Levee Database (NLD). In accordance with Engineering Circular (EC) 1165-2-216, the sponsor is being advised that routine inspection reports are considered to be sensitive in nature and the distribution of such to the public should be done with discretion.

If you would like to discuss the results of this inspection, please contact the Lead Inspector, Mr. Barry Cortright at (410) 962-4282. For policy questions please contact the Baltimore District Levee Safety Program Manager, Mr. Joseph Reed at (410) 962-4550. Additionally, if you need assistance during an emergency event such as times of high water, please contact the U.S. Army Corps of Engineers Emergency Area 4 Coordinator Mr. Scott Frick at (717) 770-7312 or (443) 562-2017.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. R. Jordan, III', with a stylized flourish at the end.

J. Richard Jordan, III
Colonel, Corps of Engineers
District Engineer

Enclosures

cc: letter only

The Honorable Robert Casey
United States Senator
393 Russell Senate Office Building
Washington, DC 20510

The Honorable Pat Toomey
United States Senator
248 Russell Senate Office Building
Washington, DC 20510

The Honorable Tom Marino
United States House of Representatives
410 Cannon House Office Building
Washington, DC 20515

Ms. MaryAnn Tierney
Regional Administrator
Federal Emergency Management Agency, Region III
615 Chestnut Street
Philadelphia, Pennsylvania 19106-4404

Mr. Richard D. Flinn Jr.
Director, Pennsylvania Emergency Management Agency
2605 Interstate Drive
Harrisburg, Pennsylvania 17110-9364

Director, Lycoming County Emergency Management Agency
542 County Farm Road, Suite 101
Montoursville, Pennsylvania 17754

The Honorable Gabriel Campana
Mayor of Williamsport
5 West Fourth Street
Williamsport, Pennsylvania 17701

Mr. John Grado
Director of Community Development
245 West Fourth Street
Williamsport, Pennsylvania 17701

Eugene K. Gruber, P.E.
Mitigation Division Director
Federal Emergency Management Agency Region III
615 Chestnut Street
One Independence Mall, Sixth Floor
Philadelphia, Pennsylvania 19106-4404