



**FEMA**

December 6, 2023

Dave Harner  
County Manager, Lee County  
PO Box 398  
Ft. Myers, FL 33901

Reference: National Flood Insurance Program (NFIP) – Floodplain Management Post-Disaster

Dear Mr. Harner:

As part of FEMA's ongoing compliance responsibilities following Hurricane Ian, our staff toured your community's Special Flood Hazard Areas during the weeks of October 30<sup>th</sup> and November 4<sup>th</sup>. The two-person teams identified recent and on-going rebuilding activity for which we do not have permit documentation.

Attached is the list of **590 sites** that were identified. We are requesting the city provide all the permit documentation as listed below to [FEMA-R4-FMI@fema.dhs.gov](mailto:FEMA-R4-FMI@fema.dhs.gov), on or before **January 12, 2024**.

This will demonstrate your community's floodplain management program meets minimum NFIP requirements to ensure your community continues to be eligible for Community Rating System (CRS) participation.

Please see the documentation requested below.

Community Determination	Documentation Needed
Structure compliant, based upon review of Elevation Certificate	Were repair permits issued? <ul style="list-style-type: none"><li>• If yes, provide the structural repair/improvement permit #s and issuance dates, or</li><li>• If no, proof of the enforcement action.</li></ul>
Community Determined, Structure IS Substantially Damaged/Improved	<ul style="list-style-type: none"><li>• Substantial Damage/Improvement notification letter</li><li>• Substantial Damage/Improvement assessment calculation documentation</li><li>• Calculated damage/improvement percentage</li><li>• Structural repair/improvement permit #s</li><li>• Permit issuance dates</li></ul>

Community Determination	Documentation Needed
<b>Community Determined, Structure is NOT Substantially Damaged/Improved</b>	<ul style="list-style-type: none"> <li>• Substantial Damage/Improvement assessment calculation documentation,</li> <li>• Calculated damage/improvement percentage</li> <li>• Structural repair/improvement permit #s</li> <li>• Permit issuance dates</li> </ul>
<b>Unpermitted repairs/improvements</b>	<ul style="list-style-type: none"> <li>• Proof of the enforcement action</li> <li>• and documentation based upon the community determination (see above)</li> </ul>

Failure to provide this information will lead to enforcement action.

*Section 211 of the CRS Coordinator's Manual states that the basic requirement for CRS participation is that "The community must be in full compliance with the minimum requirements of the NFIP." ... "If a community is determined at any time to be in less-than-full compliance, it will retrograde to a CRS Class 10."*

For CRS communities, the first enforcement action is a CRS retrograde to class 10 followed by probation.

My team has discussed this information request with your community's floodplain administrator. If your staff members have questions or require additional information, please call Mr. Jason Hunter at (404) 909-6125, or e-mail him at [jason.hunter@fema.dhs.gov](mailto:jason.hunter@fema.dhs.gov).

Sincerely,



Jacky S. Bell  
Division Director  
Mitigation Division

Attachment: Site List

Cc:

Mr. Conn Cole, Florida NFIP State Coordinator  
Billie Jacoby, CRS Coordinator/FPA, Lee County