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4767 New Broad Street
Orlando, FL 32814

August 26, 2025

Re: Property Flood Risk & Elevation Concerns
Property: 321 E. Copeland Dr., Orlando, FL 32806

To Whom It May Concern:

I have reviewed the above-referenced property in the context of FEMA floodplain standards, risk-mapping guidance, and community resiliency requirements. Based on my professional expertise, I offer the following:

1. Property Elevation and Flooding Pattern

- The home sits approximately 3–4 feet below street grade on a slope draining directly into Lake Copeland.
- During heavy rainfall, stormwater flows downhill from the street against the house before routing around it into the lake.
- This condition places the home at the direct impact point of stormwater flows rather than functioning as a passive drainage basin, making flooding highly probable.

2. FEMA Freeboard and Flood Risk Standards

- FEMA guidance requires **a minimum of three feet of freeboard above the base flood elevation (BFE)** in riverine areas, with **no less than two feet accepted under any circumstance**.
- The subject property currently has **negative freeboard**, sitting well below grade and below adjacent road elevations. This fails even the lowest allowable FEMA safety margin.
- Zone X is no longer considered "low risk" or "preferred." FEMA explicitly recognizes that **Zone X areas remain flood-prone** and encourages communities to enforce elevation standards.

3. Residual Risk and Community Standards

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- FEMA stresses that **residual risk remains** even where drainage systems exist — levees, barriers, or grading can be overtopped or fail.
- Being below street level intensifies residual risk since stormwater naturally channels into the property's footprint.
- FEMA policy expressly encourages **local governments to adopt elevation standards for Zone X properties** in order to reduce both life safety threats and property losses.

4. Insurance and Financial Implications

- Flood insurance premiums are already rising nationwide due to FEMA's Risk Rating 2.0 program, and Zone X no longer carries a preferred rating.
- A below-grade home is financially penalized — premiums increase while resale value diminishes.
- Elevating the structure to compliant with freeboard standards would reduce premiums, improve marketability, and protect long-term financial stability for both the homeowner and the neighborhood.

5. Safety and Community Resilience

- Flooding at this property has already been reported by neighbors, proving this is not hypothetical.
- Elevation safeguards residents, preserves the property, and strengthens the neighborhood's resilience to storm events.
- Leaving the house at its current below-grade elevation forces stormwater into the structure's path, creating an **ongoing and foreseeable hazard**.

6. Professional Opinion & Closing

The only responsible long-term solution is to **elevate the home to street level**. This action:

- Brings the property into alignment with **FEMA's 44 CFR §65.10 freeboard requirements**.
- Addresses the documented flooding history at Lake Copeland.

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- Protects public safety, neighborhood resilience, and financial stability for decades to come.

For these reasons, it is my professional opinion that elevation is necessary to reduce risk, satisfy FEMA's minimum flood safety standards, and ensure compliance with modern community resilience practices.

Sincerely,

Damon Rigetta
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Appendix – FEMA Authorities and Guidance

1. ***44 CFR §65.10(b)(1)(i)*** *– Freeboard Requirements (Riverine)*
   "Riverine levees must provide a minimum freeboard of three feet above the water-surface level of the base flood. … Under no circumstances will freeboard of less than two feet be accepted."

2. ***FEMA Levee Guidance (2018)*** *– Residual Risk*
   FEMA defines residual risk as the probability and consequences of flooding that remain even after protective measures (levees, grading, or barriers) are in place. FEMA emphasizes that accredited or mapped systems can still fail or be overtopped, and communities should adopt higher elevation standards accordingly.

3. ***FEMA Risk MAP Program*** *– Zone X Flood Risk*
   FEMA guidance clarifies that Zone X is no longer "preferred" or low risk. Flooding is still possible in Zone X, and communities are encouraged to adopt local standards to require protective elevation in order to mitigate life safety and economic losses.