

September 4, 2025

Bonner County Planning Department  
Attn: Jason Johnson, Certified Floodplain Manager, Planner II  
1500 Highway 2, Suite 208  
Sandpoint, Idaho 83864

**RE: S0001-25 – Deerfield Subdivision - Base Flood Elevation Memo**

Dear Mr. Johnson,

We request that this memo become part of the record for the Deerfield Subdivision application prior to the next public hearing scheduled for September 9, 2025. The applicant is compliant with current BCRC requirements prior to preliminary plat approval. BCRC requires compliance with federal determinations before building permits are issued, not before preliminary plat approval.

Per BCRC 14-503.A.3, subdivision proposals greater than five (5) acres containing Special Flood Hazard Areas (SFHAs) without established base flood elevations (BFE) are required to provide BFE data. The code further requires the applicant/developer to submit an application for a Conditional Letter of Map Revision (CLOMR) prior to Preliminary Plat approval and obtain a Letter of Map Revision (LOMR) prior to the issuance of building permits.

The BFE represents the maximum water surface elevation anticipated during a 100-year flood event. This elevation is used to establish flood insurance premiums and building restrictions for any proposed construction in flood zones.

The highest calculated BFE in the proposed project vicinity is located upstream of the subject parcel at 2092.2 feet. All future homes within the Deerfield Subdivision are anticipated to be constructed approximately 26 feet or more above Syringa Creek based on our calculated BFE, site topography, and the elevation of the proposed Deerfield Drive. Although the establishment of BFE, in this instance, has no practical bearing on the subdivision proposal, we acknowledge it must be provided per BCRC.

On May 28, 2025, HMH submitted the required CLOMR application to FEMA (Case No. 25-10-0483P). FEMA responded on August 11, 2025, requesting minor revisions, which were submitted with supporting documentation on August 20, 2025. The review remains in progress, and the timeline for FEMA's final action is unknown. The applicant has, however, satisfied the BCRC requirement by submitting the CLOMR application prior to Preliminary Plat. No building permits may be issued until the LOMR is received from FEMA in accordance with BCRC.

As Bonner County Planning Staff can attest, the purpose of preliminary plat approval (with conditions) is to provide the developer with objective parameters to allow them to complete the engineering and construction in an efficient manner while fulfilling all legal requirements for final plat approval and ultimately issuance of building permits. Submitting an application to FEMA, not waiting for FEMA's response, is the legal standard established by BCRC for preliminary plat approval.