



**FEMA**

February 17, 2023

The Honorable Holly D. Smith  
Mayor, City of Sanibel  
800 Dunlop Rd  
Sanibel, FL 33957

Dear Mayor Smith,

We would like to provide clarification for the February 14, 2023 letter sent to Lee County, Florida and incorporated communities, regarding market values used when making substantial damage determinations.

Communities are eligible for participation in the National Flood Insurance Program (NFIP) if they have land-use authority. Participating communities adopt and enforce regulations that meet or exceed minimum standards in Title 44 of the Code of Federal Regulations and are responsible for reviewing permit applications, making compliance determinations, and issuing permits. This authority includes:

- defining market value in locally-adopted regulations; and
- reviewing submitted market value when making substantial damage determinations to ensure that values are determined using a sound, consistent methodology.

County property appraisers have the authority to assess the value of real property and are charged with deriving property valuations taking into consideration various factors. FEMA will coordinate with the Lee County Appraiser to better understand the methodology used to determine the property valuations issued after Hurricane Ian.

As the administrator of the NFIP, it is FEMA's responsibility to provide technical support. In coordination with the State NFIP Coordinator we are currently scheduling visits with local floodplain administrators within Lee County to provide technical support and ensure that communities are uniformly enforcing their floodplain management regulations. If you have any questions, please contact Jason Hunter at [jason.hunter@fema.dhs.gov](mailto:jason.hunter@fema.dhs.gov) or 770-220-5471.

Sincerely,

A handwritten signature in black ink that reads "Jacky S. Bell". The signature is fluid and cursive.

Jacky S. Bell  
Director  
Mitigation Division

Cc: Conn Cole, Florida NFIP State Coordinator  
Craig Mole', Floodplain Administrator, City of Sanibel