

Subject: Comments on the Status of the EMA – Bulletin 17B Testing

To: John England, USBR, and Tim Cohn, USGS

From: The Data Group of the Hydrologic Frequency Analysis Work Group (HFAWG)

Date: September 30, 2008 (prepared by Will Thomas, HFAWG Chairman)

The Data Group of the HFAWG consists of Martin Becker, Beth Faber, Don Woodward, Jerry Coffey, Nancy Steinberger and Will Thomas. On July 30, 2008, the Data Group had a conference call to discuss the EMA-Bulletin 17B testing results that John England sent to Will Thomas on May 5, 2008. A few members of the Data Group also participated in the Subcommittee on Hydrology (SOH) meeting on July 31, 2008. We apologize for our slow response. The Data Group has the following comments:

- The most effective manner in which to review the testing results and evaluate any potential benefits of EMA is to review the results after you have completed the testing described in the August 9, 2007 email and attachments from Will Thomas to John England and Tim Cohn. Therefore, we request that you hold off on sending us any interim results until all the testing has been completed and adequately documented. (We realize that you provided the interim May 5, 2008 results at the request of Will Thomas.)
- We realize that you have limited time to work on the proposed testing but there is a growing concern within the Data Group that there are some operational problems with the EMA. We understand that you have set aside significant time this Fall to complete the testing. We encourage you to complete the proposed testing (August 9, 2007 email) by the end of the calendar year.
- Some of our concerns stem from the May 5, 2008 results provided to Will Thomas. For those stations with low outliers and peaks below a gage base, there are significant differences in the 100-year estimates between EMA and Bulletin 17B. A review of the results indicates that EMA does not always produce reasonable results (based on engineering judgment).
- At the July 31, 2008 meeting of the Subcommittee on Hydrology (SOH), Jerry Webb, USACE, expressed concerns that some USACE personnel were asking for copies of Bulletin 17C. Jerry indicated that we should not give the impression that publication of Bulletin 17C is imminent. As the Data Group understands it, USBR and USGS are using EMA on selected agency projects. We ask that in any presentations, training or outreach, you clearly indicate that the HFAWG/SOH has not approved EMA, that the use of EMA is an agency decision and revisions to Bulletin 17B are not imminent. For your information, FEMA has made the decision not to allow use of EMA until the HFAWG has approved it.

- At the July 31, 2008 SOH meeting, Robert Mason, USGS, acknowledged that the standalone version of PeakFQ and Version 5.2 on the USGS web site do not provide the same results. We encourage you to finalize the EMA code as soon as possible and make sure that the code will run on all operating systems commonly used for engineering applications.
- We ask that all future correspondence be shared with all members of the Data Group. Please contact the Data Group, as identified above, if you have questions or comments.