

Transparency into FEMA's Appeal Process for the California Coastal Analysis and Mapping Project

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Region IX, and James Johnston, AECOM

Concurrent Session: C7; Date: June 19; Time: 3:45 - 5:15

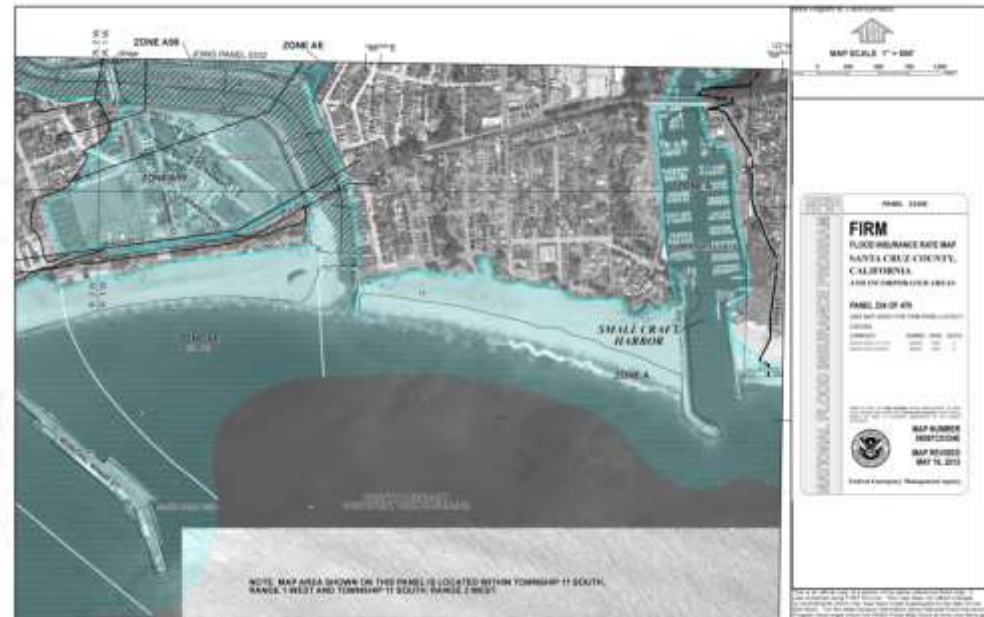
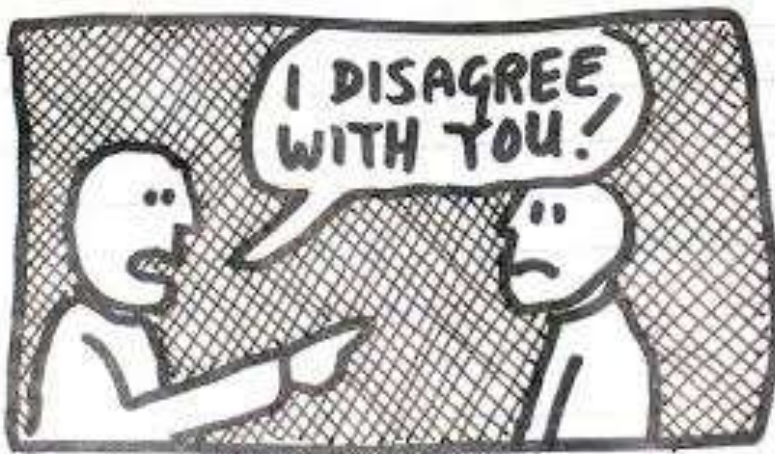


FEMA

June 19, 2018

PRESENTATION OVERVIEW

- FEMA's Nationwide Coastal Re-Mapping Project
- FEMA Region IX's CCAMP
- FEMA's Appeal Process
- Focus on Open Pacific Coast Study Appeals





FEMA

FEMA'S NATIONWIDE COASTAL RE-MAPPING PROJECT



FEMA'S NATION-WIDE COASTAL RE-MAPPING PROJECT



NATIONWIDE APPEAL SUBMITTALS

- More than 180 Appeal/Comment submittals during the Appeal Period
- Roughly 100 qualified as an appeal

| Region | Community Appeals / Comments |
|--------|------------------------------|
| I | 22 |
| II | 65 |
| III | 31 |
| IV | 1 |
| VI | 9 |
| IX | 15 |
| X | 39 |

| APPEAL/COMMENT SUBMISSION FORM | | |
|---|-----------------------|-----------------|
| SUBMITTER INFORMATION | | |
| Full Name(s): _____ | | |
| Company/Organization/Entity (if applicable): _____ | | |
| Mailing Address: _____ | | |
| City: _____ | State: _____ | ZIP Code: _____ |
| Telephone: _____ | E-mail: _____ | |
| SITE INFORMATION | | |
| Site Description: _____ | | |
| Address or Nearest Intersection: _____ | | |
| Community: _____ | County/Borough: _____ | State: _____ |
| Affected FEMA Panel(s): _____ | | |
| Flooding Source(s): _____ | | |
| NATURE OF CONCERN | | |
| <p>Refer to FEMA's publication: <i>Criteria for Appeals of Flood Insurance Rate Maps</i> available through http://www.fema.gov/coastal.com/51516. Note that your request will be categorized as an appeal or comment based on the nature of the request, the supporting information provided, and whether or not the request was received during the statutory 90 day appeal period.</p> | | |
| <p>My concern is with:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Proposed Base Flood Elevations (RFEs) <input type="checkbox"/> Proposed Flood Depths <input type="checkbox"/> Proposed Special Flood Hazard Area (SFHA) Boundaries <input type="checkbox"/> Proposed Regulatory Floodway Boundaries <input type="checkbox"/> Proposed SFHA Zone Designations <p>OR</p> <ul style="list-style-type: none"> <input type="checkbox"/> Street/Road Name(s) <input type="checkbox"/> Flooding Source Name(s) <input type="checkbox"/> Jurisdictional Boundaries <input type="checkbox"/> Other _____ | | |
| General Description of Feedback: _____ | | |
| SUPPORTING DOCUMENTATION | | |
| <p>Refer to FEMA's publication: <i>Criteria for Appeals of Flood Insurance Rate Maps</i> available through http://www.fema.gov/coastal.com/51516.</p> | | |
| The following documentation is being submitted to support this request: | | |
| <ul style="list-style-type: none"> <input type="checkbox"/> Hydrologic or Hydraulic Analyses <input type="checkbox"/> Coastal Analyses <input type="checkbox"/> More Detailed Topographic Data <input type="checkbox"/> Revised Floodplain Mapping <input type="checkbox"/> Revised Flood Insurance Study Information <input type="checkbox"/> Other _____ | | |
| CONFIRMATION AND SIGNATURE | | |
| I, the undersigned, attest that all of the above is true and accurate to the best of my knowledge. | | |
| Name: _____ | | |
| Date: _____ | | |

FEMA REGION IX: CALIFORNIA COASTAL ANALYSIS AND MAPPING PROJECT



CALIFORNIA COASTAL ANALYSIS AND MAPPING PROJECT

Two Companion Large-Scale Efforts:

- Open Pacific Coast (OPC) Study
- San Francisco Bay Area Coastal (BAC) Study

Re-study flood risk
along the open coast
and inland bays of all
California coastal
counties



Re-map the elevation
and inland extent of
wave-induced coastal
flooding

www.r9coastal.org

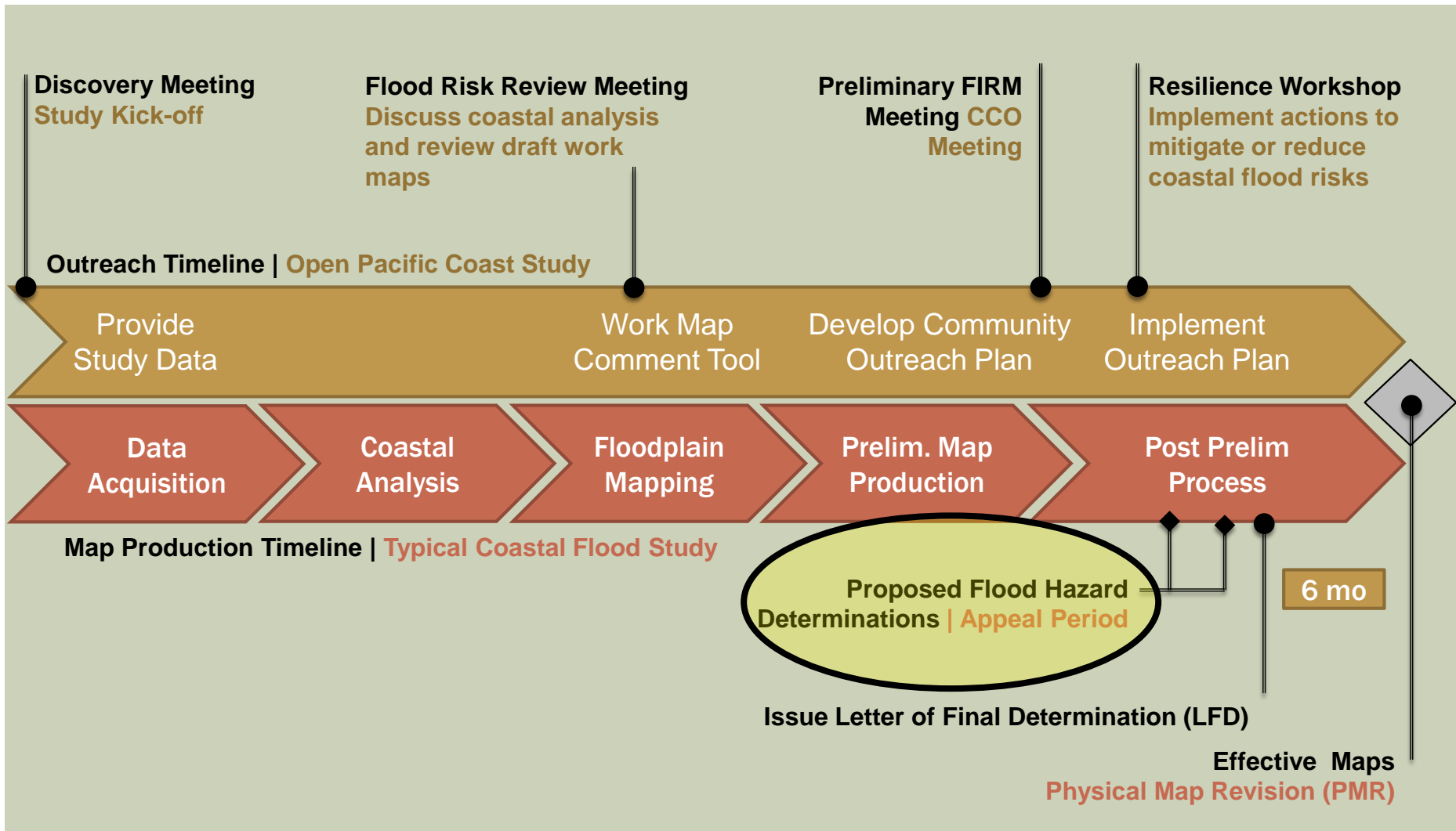
OPEN PACIFIC COAST STUDY

EFFORTS TO MINIMIZE APPEALS

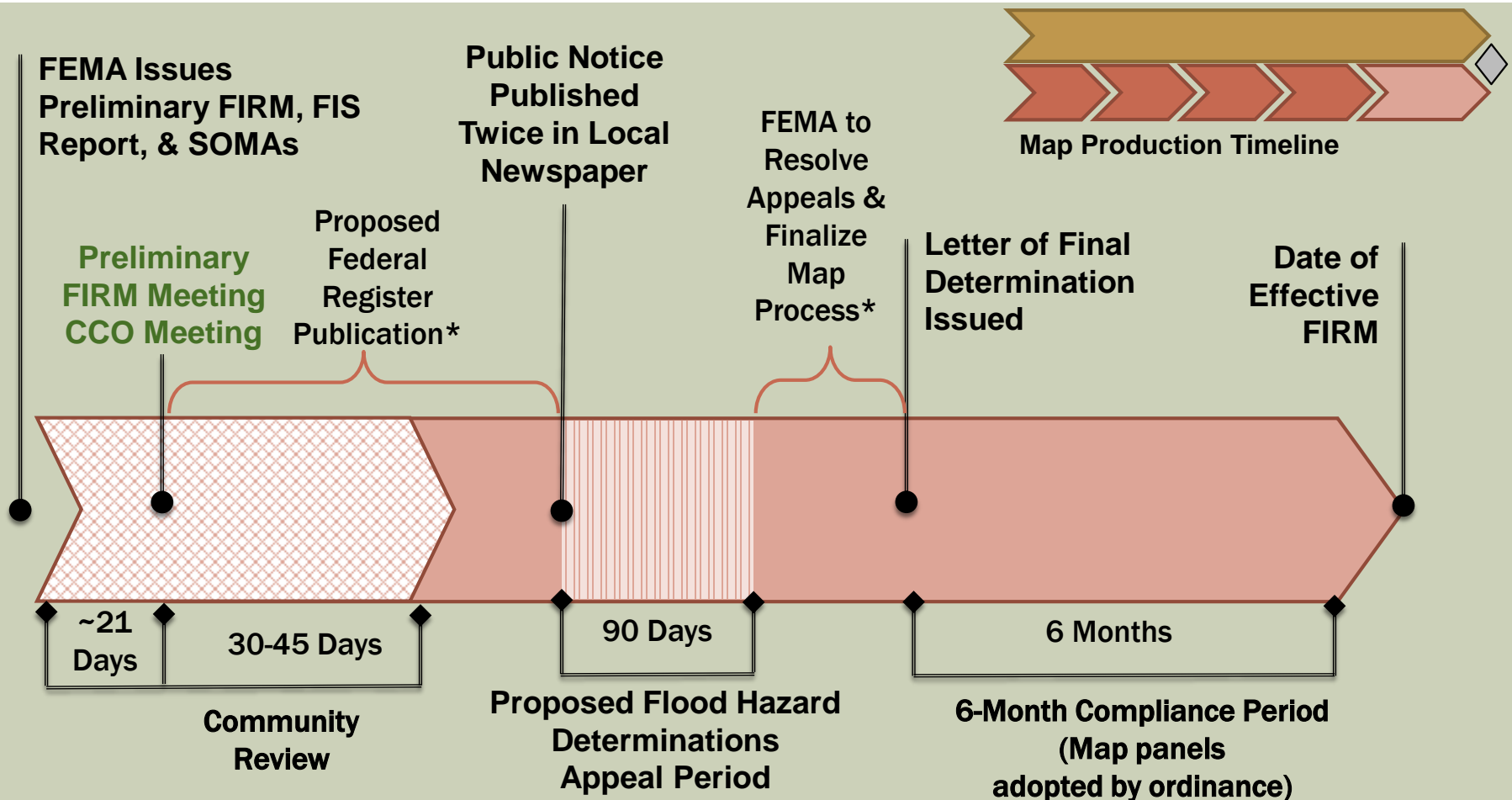
- New Pacific Coast Guidance
- Program Management
- Key Subs: OWI, SIO
- Effective Quality Program
- Technical Advisory Panel
- Online Workmap Comment Tool
- Continuous Outreach
- Latest FEMA FIRM format
- CCAMP Website



PROJECT TIMELINE



POST-PRELIMINARY MAPPING PROCESS



* The timeframes for completing these activities varies.

FEMA'S APPEAL PROCESS

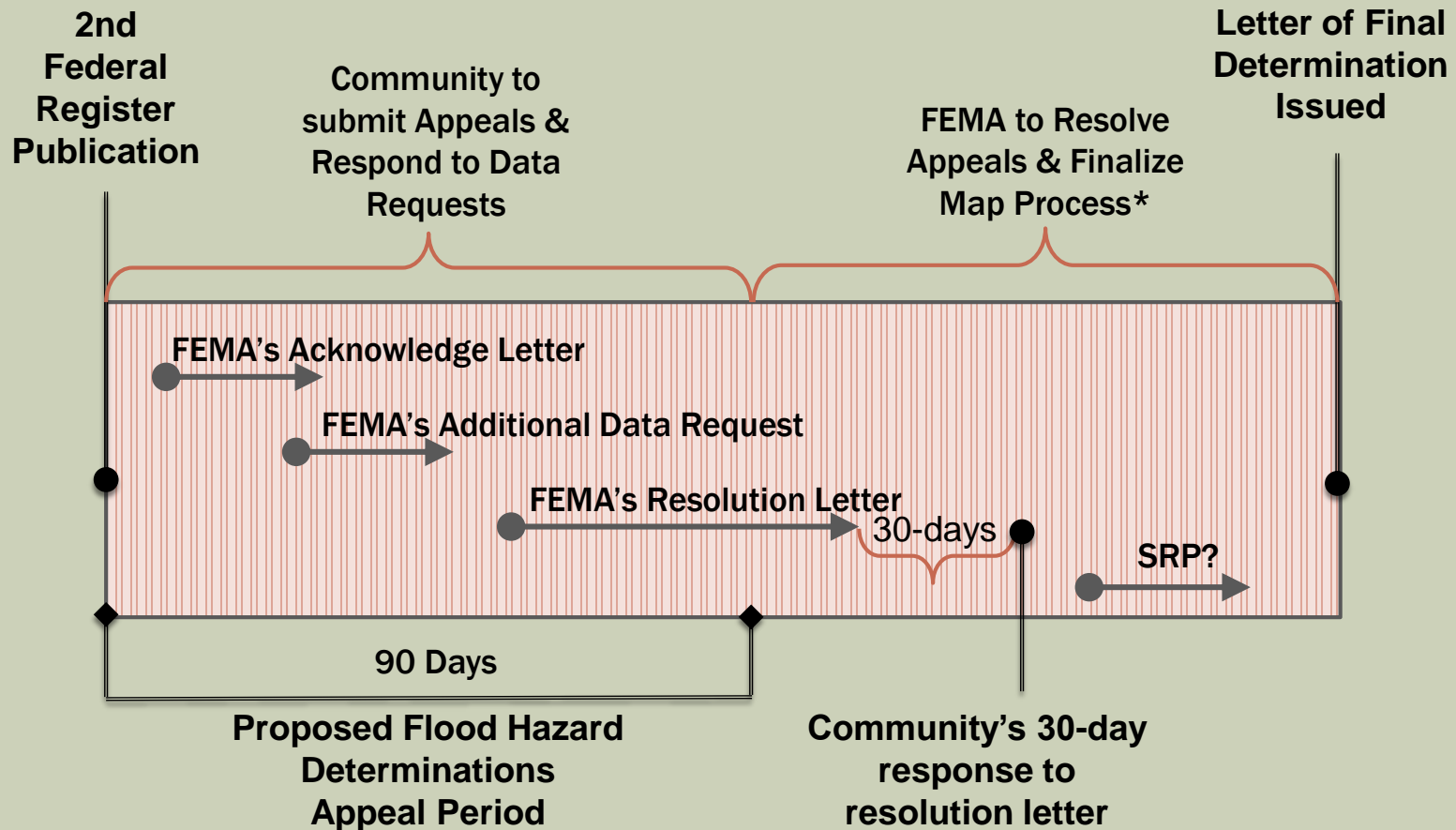


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90-DAY APPEAL PERIOD FOR A PRELIMINARY FIRM

- The addition/modification of BFEs/base flood depths or any change in SFHA boundary, or zone designation requires a statutory 90-day appeal period and the fulfillment of the additional due process notification requirements outlined in the NFIP regulations **Title 44, Chapter I, Section 67 (44CFR67)**
- Anyone can submit (via the community official)
- Feedback inside of 90-day appeal period.

FEMA'S APPEAL PROCESS



* The timeframes for completing these activities varies.

TYPICAL SUBMITTALS

- Map corrections (Typical Comments)
 - Road names, flooding source names, Community Boundaries or other base map features
- New or updated flood hazard information (Typical Appeals)
 - Issues with the BFE
 - New Topographic Data
 - Revised Coastal Flood Hazard Analysis
 - Revised Floodplain, Zone, or Floodway Boundaries

OPEN PACIFIC COAST STUDY APPEALS



FEMA RIX'S EXPERIENCE WITH “SUBMITTALS”

- 6 Counties made Submittals to FEMA RIX during their Appeal Period
- FEMA evaluates each submittal for compliance with 44CFR67.4
 - Sort Comments from Appeals
- FEMA Responds by letter to the community (and resident)
 - Coordinating with the community & community's engineer
 - Sometimes Additional Data is requested
- Active Community Coordination via email & meetings

PHASE 1 – TEN COUNTIES

THREE SUBMITTED COMMENTS/APPEALS

- Del Norte County
 - 2 Comments
- Marin County
 - 1 Comment
- Santa Cruz County
 - 11 comments
 - 1 appeal



DEL NORTE COUNTY CRESCENT BEACH MOTEL

- Appeal/**Comment**
 1. Boundary Error
 2. Map labeling error
- Resolution - comments acknowledged.



MARIN COUNTY

STINSON BEACH

■ Appeal/**Comment**

1. Zone Designation for Seadrift Lagoon

- Resolution- Appeal acknowledgment sent, request for additional information. Revised Lagoon Boundary incorporated into maps.

Effective FIRM:
Bollinas Lagoon: Zone AE 8, Zone A
Stinson Beach: Zone V, Zones VE 18-27



2015 OPC Preliminary FIRM:
Bollinas Lagoon: Zones AE 8-10
Stinson Beach: Zones VE 14-22



SANTA CRUZ COUNTY

COMMENTS

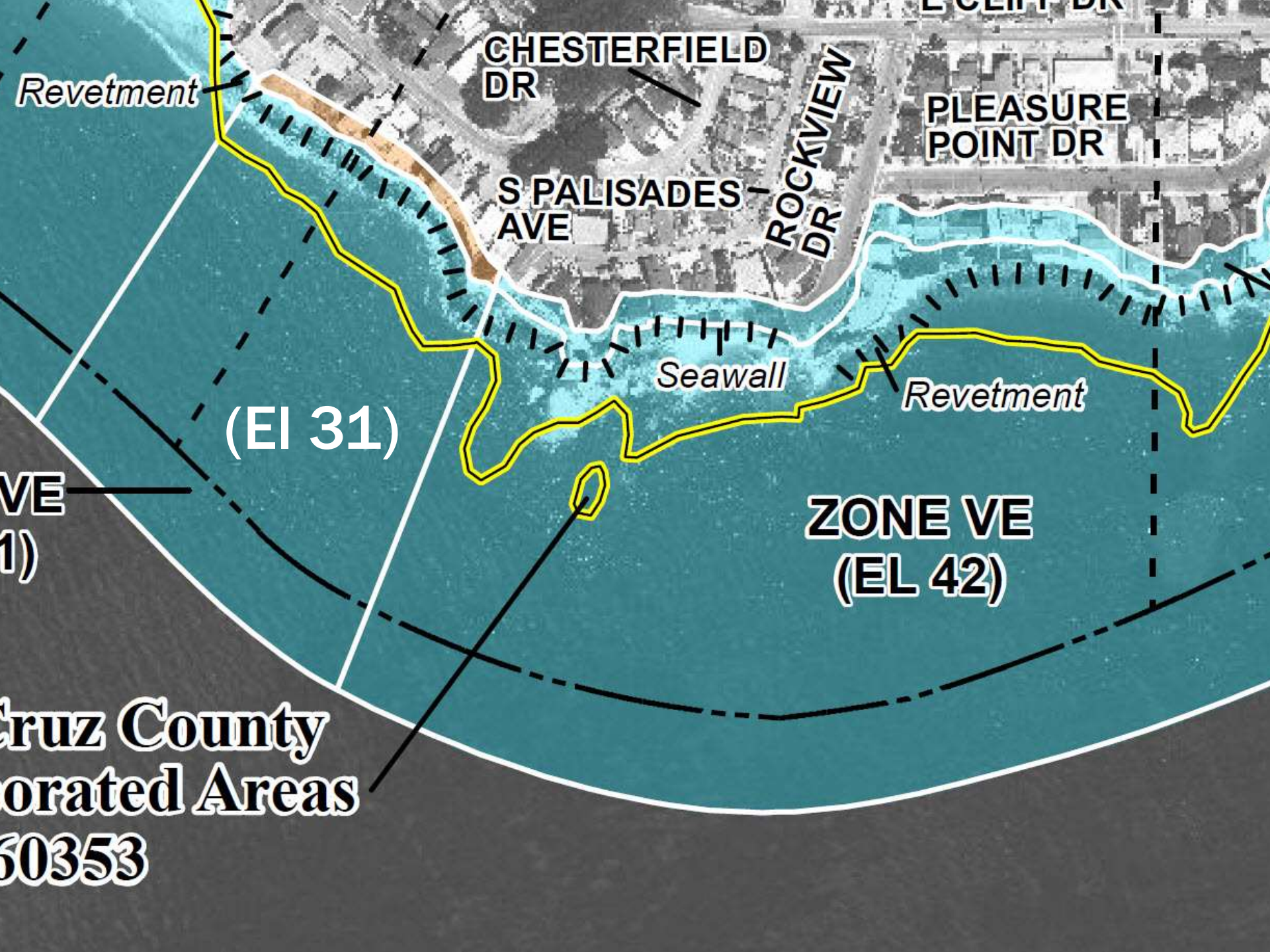
- Appeal/**Comments** (Floodplain Boundaries)
 - 1. Eleven Comments
- Resolution - Comment acknowledgment and resolution letters sent to 11 applicants. No Change.

SANTA CRUZ COUNTY

2866 SOUTH PALISADES AVENUE

- **Appeal/Comments** (Floodplain Boundaries)
 1. (Bluff) Overtopping Distance
 2. Properties should be located in an adjacent reach





Revetment

CHESTERFIELD
DR

PLEASURE
POINT DR

S PALISADES
AVE

ROCKVIEW
DR

Seawall

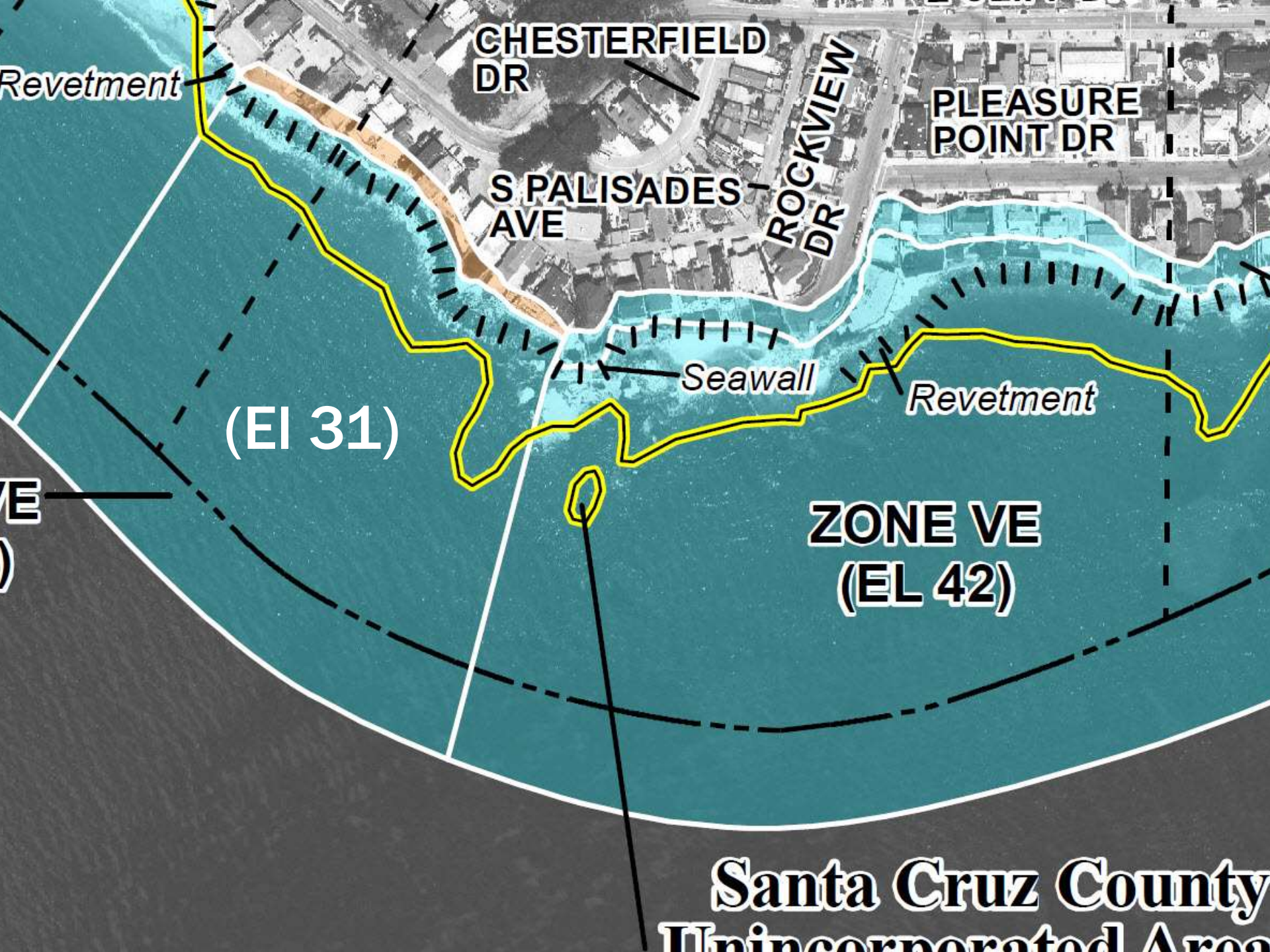
Revetment

(EI 31)

ZONE VE
(EL 42)

VE
(1)

Cruz County
Incorporated Areas
60353



CHESTERFIELD
DR

PLEASURE
POINT DR

S PALISADES
AVE

ROCKVIEW
DR

Revetment

Seawall

Revetment

(EI 31)

ZONE VE
(EL 42)

E

)

Santa Cruz County
Unincorporated Area

PHASE 2 – FIVE COUNTIES

THREE COUNTIES SUBMITTED COMMENTS/APPEALS

- **Ventura County**
 - 2 Submittals
- **Los Angeles County**
 - City of Malibu
 - Hermosa Beach
- **Orange County**
 - Newport Beach
 - Seal Beach
 - Dana Point



VENTURA COUNTY

(IN PROGRESS)

- Appeal/Comment Submittal
 1. Ventura County submittal (on behalf of City of Ventura, Oxnard, and Port Hueneme)
 2. Faria Beach HOA submittal
- Evaluation in progress

LOS ANGELES COUNTY

MALIBU AND HERMOSA BEACH

- **Appeal/Comment**

1. Malibu – in progress
2. Hermosa Beach

- Resolution - Revisions to mapping and coastal analysis are underway. Preparing revised prelims.

ORANGE COUNTY

SEAL BEACH, NEWPORT BEACH, DANA POINT

■ Appeals

1. Newport Beach appeal included new hydrodynamic modeling in Newport Bay
2. Seal Beach, Newport Beach, and Dana Point appeals included additional open coast topographic data and transect reanalysis

- Resolution – FEMA requested additional information, met with communities, mailing revised prelim maps on 6/20/18 with a 30-day comment period

SAN FRANCISCO BAY BAY AREA COASTAL STUDY

- San Francisco
 - Appeal became a Comment – Piers and Wharves
- San Mateo County
 - Appeal
 - Scientific Resolution Panel
- Alameda County
 - Comment
- Santa Clara County
 - Comment



CLOSING REMARKS

- ~60% of Coastal Appeals were approved nationwide
- Appeal avoidance activities
- Continuous communication
- FEMA encourages feedback at anytime
- Must meet the requirements of 44CFR67
- Other options: Scientific Resolution Panel, LOMA, LOMR