



FEMA

February 8, 2016

The Honorable Jackie Speier  
United States House of Representatives  
Washington, DC 20515

Dear Representative Speier:

Thank you for your correspondence dated December 22, 2015, to the Department of Homeland Security, Federal Emergency Management Agency (FEMA) Region IX Office, on behalf of the City of San Bruno. You requested that FEMA postpone San Bruno's 90-day appeal period for the preliminary Flood Insurance Rate Maps (FIRMs) updated through the San Francisco Bay Area Coastal Study, which began in 2005 and is intended to better define coastal flood risks.

FEMA has worked with the City of San Bruno and its consultant and appreciates the community's shared desire to ensure that the best science is represented on the FIRM and in the Flood Insurance Study. Through a variety of coordination opportunities, including a Discovery meeting, Consultation Coordination Officer meetings, and Flood Risk Review (FRR) meetings, FEMA has worked with each community involved in the Bay Area Coastal Study. FEMA and San Mateo County met on October 1, 2014, and although the City of San Bruno was inadvertently left off the official invitation list, FEMA contacted the city and held an individual FRR meeting with city representatives via webinar on December 12, 2014.

FEMA also provided a comment period following the FRR meeting for City of San Bruno officials to provide input. During that time, FEMA, the City of San Bruno, and its consultants reviewed the draft work maps together. The City of San Bruno and its consultants provided comments on the draft work maps on January 15 and February 15, 2015, and FEMA provided written responses to all of the comments and attended an in-person meeting with elected officials, including officials from the City of San Bruno. At this meeting, FEMA discussed the comments, the schedule for the Bay Area Coastal study, and the future appeal process.

In your letter, you expressed concern about the restrictions of the 90-day period to prepare a technical appeal. While we are sensitive to the time limitations provided by the length of the statutory appeal period, FEMA has provided approximately 5 months from the date the preliminary FIRM was issued, and over a year since the draft work map review period, for affected communities to develop appeals. Based on the projected timeline for the study and the interactions with the City of San Bruno over the last year, FEMA does not believe that postponing the 90-day appeal period for an additional 6 months is warranted at this time.

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You also requested FEMA's informal review of the methodology the city's consultant is using to prepare an appeal. The appeal resolution process is collaborative, and it will include coordination between FEMA, the City of San Bruno, and (if requested by the city) its consultant. Because it is often difficult to comment on a non-standard study approach without seeing the full study analysis and results, FEMA will not review the analysis until it is submitted. On its website, FEMA provides study guidance and a list of approved models for use in flood studies, to assist communities in the appeal submittal process. Additionally, the Regional office is available to answer remaining questions the community or its consultant may have.

After all appeals are resolved, if changes to the mapped flood zones are warranted, FEMA will issue *revised* preliminary FIRMs and hold a second comment period for the affected communities. When this process is complete, FEMA will issue each community a Letter of Final Determination (LFD), and the FIRMs will be finalized. Six months after the LFD is issued, the updated FIRMs will become effective. The flood insurance requirements associated with the updated FIRMs will not apply until the maps are effective, which FEMA anticipates will be in early 2017.

If the City of San Bruno receives information supporting map changes following the conclusion of the appeal period, city representatives can bring this information to FEMA's attention for review and consideration as a Letter of Map Revision (LOMR). If the data meet technical specifications and the results are substantively different, FEMA will work to reflect the changes on the FIRM as quickly as possible. Depending on when the data are submitted and the extent of the changes, the information could be reflected on the new FIRM in the days after it becomes effective; however, if the information is provided to FEMA after the final determination is issued and the extents are widespread, additional time may be required to update the FIRM. The Region can assist the community and its consultant in coordinating timelines, as appropriate. Information about the LOMR process is available online at <https://www.fema.gov/media-library/assets/documents/1343>.

Finally, your letter commented on the fact that many of the flood risks identified within the City of San Bruno originate from flooding sources outside the jurisdictional boundaries. FEMA's flood maps identify hazards from any flooding sources, regardless of the jurisdiction in which the hazard originates.

FEMA appreciates its partnership with the City of San Bruno and looks forward to continued collaboration that results in flood risk products that are of value to the city and its residents. Once the additional data from the community's study are available, the Region IX Office will be available to discuss current timelines and next steps so that the appropriate changes to the flood maps can be accomplished expeditiously. The Region plans to continue partnering with San Bruno through the study process and is available to address any of the community's remaining questions.

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I hope this information is helpful to you. If you need additional information or assistance, please have a member of your staff contact the FEMA Congressional Affairs Division by telephone at (202) 646-4500.

Sincerely,



Roy E. Wright  
Deputy Associate Administrator  
for Insurance and Mitigation

cc: Robert Feinton, Regional Administrator, FEMA Region IX  
Jeffrey D. Lusk, Director, Mitigation Division, FEMA Region IX  
Juliette Hayes, Risk Analysis Branch Chief, FEMA Region IX  
Shilpa Mulik, Regional Engineer, FEMA Region IX  
Casey De Shong, Congressional Liaison, FEMA Region IX