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February 26, 2024

Brian Koper  
Engineering Services Branch, Risk Management Directorate  
Oceans, Wetlands, and Communities Division, Office of Water (4504-T),  
Federal Emergency Management Agency  
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Dear Mr. Koper,

Thank you for the opportunity to comment on the Federal Emergency Management Agency's (FEMA) Agency Information Collection Activities: Submission for OMB Review, Comment Request; Revision to National Flood Insurance Program Maps: Application Forms and Instructions for LOMRs and CLOMRs. The City of San Diego (City) is committed to protecting and improving water quality in our region while providing essential public services by maintaining the storm water conveyance system within San Diego for the purpose of reducing flood risk.

The request for comment involves assessing whether the level and extent of information required for a flood map revision is sufficient. Currently, per 44 CFR Part 65, FEMA requires a certified detailed analysis of the extent of impact and at least a one-half foot tie-in where revisions occur. Overall, this has been sufficient, but the City would like to provide the following comments:

- Per 44 CFR Part 65.2, the definition of "reasonably safe from flooding" is noted as base flood waters "will not" inundate the land or damage structures to be removed from the SFHA and that any subsurface waters related to the base flood "will not" damage existing or proposed buildings. The inclusion of the phrase "will not" contradicts the fact that the results are only approximate and are based on the best information at that time. To lessen the contradiction, we recommend updating the definition to change the phrase "will not" to "are predicted to not".
- 44 CFR Part 65.4 involves the "Right to submit technical data". Regarding section b which states (All requests for changes to effective maps, other than those initiated by FEMA, must be made in writing by the Chief Executive Officer of the community (CEO) or an official designated by the CEO. Should the CEO refuse to submit such a request on behalf of another party, FEMA will agree to review it only if written evidence is provided indicating the CEO or designee has been requested to do so.) We recommend that if "another party" approaches FEMA directly for a review claiming that the community refused to review or respond, that FEMA makes a reasonable attempt to contact the community to inform them of the party's request to protect against any unintentional workarounds or miscommunication.
- 44 CFR 65.6 involves "Revisions of the base flood elevation determination". Sections 9 and 11 regarding the hydrologic and hydraulic analysis and delineation of floodplain boundaries when a flooding source does not have a base flood established, the code only requires that the 100-year information is submitted. For the benefit of the local communities, and to obtain a more complete perspective, the 500-year information should be included as well. It is understood that the 500-year is not regulated, but the data in those areas are still valuable and important for the overall management and understanding of a floodplain.

Thank you for your time and consideration of these comments. If you have questions, please contact Alex Gostomelskiy at 858-541-4337 or at AleksandrG@sandiego.gov .

Sincerely,

Sumer Hasenin  
Deputy Director  
City of San Diego Stormwater Department