May 30, 2008

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Federal Emergency Management Agency, Region IX
1111 Broadway, Suite 1200
Oakland, CA 94607

Subject: Comments on preliminary Flood Insurance Rate Map for San Mateo County

We have reviewed the preliminary Flood Insurance Rate Map (FIRM) issued April 18, 2008 for San Mateo County, which includes the San Francisco International Airport.

The FIRM appears to be a direct digital conversion from the 1984 FIRM, with base map information updated to reflect more recent data. However, it does not appear that the flood hazard information shown on the FIRM reflects physical changes made at the Airport the past 20 years.

The Airport has performed many drainage and shore protection upgrades in the past two decades. Continuous improvements have been made to the storm drain systems, shoreline protection structures, and ground elevations. These upgrades are summarized below.

**Storm Drain systems:**
The Airport has improved its storm system. Airport storm drain system is shown on Attachment C2.1.1. This system eliminates ponding from storm water and high tide water.

**Shoreline protection structures:**
The Airport has constructed and maintained shoreline protection structures along the Airport perimeter. The shoreline protection layout is shown on Attachment C2.1.1 and typical cross sections of these structures are shown on Attachment C2.1.3. These structures were built with freeboard of 3 feet above the previously published 1 percent annual chance flood elevation of 7 feet NGVD. Given that the published flood elevations have not changed (other than to be referenced to a new datum), we assume these structures are sufficient to eliminate the threat of flooding during the 1 percent annual chance flood on the Bay.

The City and County of San Francisco submitted this data to your contractor, Nolte, in 2006 when submitting data for the preparation of the FIRM for San Francisco.

**Contours:**
The Airport contours have also been changed since the early 1980's. Current contour lines are shown on Attachment C2.1.2 and can be used to update the floodplain boundaries shown on the preliminary FIRM.
We've also reviewed the Flood Insurance Study for San Mateo County dated August 5, 1986. It does not contain information about the origin of the flood hazard information shown for the Airport on the 1984 San Mateo County FIRM. Given that the preliminary FIRM appears to represent the same information, we assume no new analysis has been conducted. Therefore, we are requesting FEMA to reevaluate the FIRM to reflect the current features of the Airport.

If you have any questions and/or comments, please contact me at (415) 554-7124.

Sincerely,

Linda S. Yeung
Deputy City Administrator

Cc: Jimmy Chiu, SFO
    John Roddy, City Attorney's Office