How To Deal With The FEMA Appeal Process While Being Used As A Pawn for Capitol Gains
Georgia Flood M.A.P. Program

CHALLENGES WITH FPM REQUIREMENTS

How To Deal With The FEMA Appeal Process While Being Used As A Pawn For Outside Gains
Georgia Coastal Risk MAP Project

Project Area
- 9 Coastal Counties
  - Bryan, Camden, Charlton, Chatham, Effingham, Glynn, Liberty, Long, & McIntosh Counties

Two Phase Project
- Phase I - Inland Flooding Areas
- Phase II - Coastal Flood Areas
- Separate Schedules

Many Partners
- FEMA, GA DNR, NOAA, CRC, Local Governments
- GA DNR Mapping Partners
  - CDM Smith
  - Dewberry
  - ATKINs
- FEMA Mapping Partners
  - Taylor Engineering
Community Background

• Community Identified WWTP location
• Purchased land
• WWTP Designed and approved
• Permits issued by DNR based on FIRM effective data.
• Similar appeals process for permitting
• Opposition from local stakeholders
The BIG Issue

• Property owner wants to stop WWTP from moving forward.

• How can I do this?....Make sure the WWTP can be identified within the SFHA.
FEMA’s regulations call for public notification and a statutory appeal period when new or modified flood risks are issued.

FEMA initiates due process through:

- A Federal Register publication
- Publication of a notice on FEMA Flood Hazard Mapping public website
- Notifying the community CEO through a proposed flood hazard determination (90-day start) letter or Letter of Map Revision (LOMR) document
- Publication of a newspaper notice twice following notification of the community CEO
Appeal Criteria

- All appeals must be supported by scientific and technical data.

- ‘Criteria for Appeals of Flood Insurance Rate Maps’ developed to support PM 57:
  - Establishes areas eligible for appeal.
  - Identifies documentation needed to support an appeal of each flood hazard type (e.g. modeling, topography, etc).
Appeal Response and Resolution

- Appeal Acknowledgement Letter
- Data Review
- Additional Data Request (if needed)
- Appeal Resolution Letter
- 30-Day Comment Period
- Optional Scientific Review Panel (SRP)
- Finalize Mapping
Area Map

SITE - SPRAY FIELD
Preliminary SFHA
Composite SFHA
|-----------|-----------|------------|----------------|-----------|---------------------|----------|------------|----------|----------|-----------|----------|-----------|
Conclusion

• Although some changes made as result of the appeal, the goal was not achieved based on the technical data.

• The appeal was not what we consider typical.
The Path Forward

• Better relationship with EPD Permitting Units
• Any Land Application System with floodplain impacts are reviewed by GA FMU
• GA FMU provides floodmap training to EPD Permitting Units
• Identifying potential issues that may cause future delays/issues
Resources

- Georgia Floodplain Management
  Todd Harris, PMP, CFM
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  404-651-8504

- Georgia Flood M.A.P.: www.GeorgiaDFIRM.com
- Georgia Community Outreach Guidebook:
  www.GeorgiaDFIRM.com/communityoff/commdocs.htm
- GEMA: www.GEMA.ga.gov
- FEMA Map Information eXchange (FMIX):
  http://msc.fema.gov
  800-FEMA-MAP (336-2627)
- Flood Insurance: www.FloodSmart.gov
Q&A Session