



**CITY OF NEWPORT BEACH  
COMMUNITY DEVELOPMENT DEPARTMENT**

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December 6, 2017

**Via Certified U.S. Mail and E-Mail ([Edward.Curtis@fema.dhs.gov](mailto:Edward.Curtis@fema.dhs.gov))**

Mr. Ed Curtis, Engineer  
FEMA Region IX  
1111 Broadway, Suite 1200  
Oakland, CA 94607

**Re: Additional Technical Analyses to Support the Appeal for Revision of the Preliminary FIRM;  
Request for Extension in Time to Respond**

**Case No.: 12-09-1324S  
Docket No.: FEMA-B-1673**

**Community: City of Newport Beach, CA  
Community No.: 060227**

Dear Mr. Curtis,

I am in receipt of FEMA's response letter to the City of Newport Beach dated November 21, 2017, requesting additional information to resolve comments in the City's submittals pertaining to the City's appeal and the Newport Bay analysis component of the City's appeal.

FEMA's letter states that the requested additional analysis must be performed and the resulting information submitted within 30 days of November 21, 2017. The City appreciates FEMA's request, but given the amount of effort required to perform the analysis and gather the information and with holidays looming around the corner, the City respectfully requests a 60-day extension (to January 20, 2018) to perform the requisite analysis and provide the requested information so the City can prepare the reports and additional data to satisfy FEMA's request. In evaluating the City's request for an extension, here are the reasons that the City of Newport Beach would like FEMA to consider:

With regard to item 1 of FEMA's letter mentioned above:

1. The mapping study would require permission from private residences to access their private properties to complete surveying of coastal structures that is required to fulfill FEMA's request.
2. FEMA seems to require an assessment that determines what:
  - a. Structures could survive a flood.
  - b. Structures that would partially fail in flood.
  - c. Structures that would completely fail in flood.
  - d. Mapping of extent of flooding that would occur into landside spaces, which would require knowledge or mapping of all coastal devices as it relates to 1% elevation reference.
  - e. Judgement regarding the survivability of the various structures that exists without having adequate knowledge of these structures noting that the City of Newport Beach has coastal structures dating back many years before the City were ever required to keep records of such structures.

- f. Maintenance plans of private coastal structures is impossible to ascertain or make property owners comply since it is private in nature.

The City acknowledges FEMA guideline documents with respect to the additional information requested, and the City proposes that the City will perform the verification that is actually and practically possible. Specifically, the City proposes to do the following to satisfy item 1 in FEMA's request for additional information:

1. Perform visual observation of the seawall by a coastal civil engineer with several years of experience in seawall design, construction and maintenance.
2. Provide an engineer's opinion of the general condition and stability of waterfront structures with respect to floodwaters.
3. Identify waterfront structures that can either resist floodwaters for the foreseeable future, or need maintenance or replacement to provide continued integrity along the waterfront.
4. The City will not be able to provide additional mapping based on ruptured or failed structures, nor can the city provide structural calculations to justify existing structures nor maintenance plans or manuals.

With regard to item 2 of FEMA's letter dated November 21, 2017:

1. The City is willing to perform a survey with more density of survey points; however, given the end of year timing and the holidays and the likelihood of multiple property owners refusing to give consent to access their properties, obtaining permission from all private property owners who might be travelling or busy with the holidays or simply refuse access will be certainly challenging. The City would survey as many survey points as possible given these practical and legal constraints.
2. Mobilizing a surveying team in tight holiday schedule with stringent timing to provide survey data, mapping and report update is a daunting task to complete in 30 days. Hence, we would like your consideration for an extension of an additional 60 days to perform the task and provide the requested data in conformance with the guide documents and FEMA guidelines.

The City is capable and willing to respond to items 3, 4, and 5 in FEMA's letter dated November 21, 2017.

We look forward to a favorable consideration in granting the City of Newport Beach the additional time extension through January 20, 2018, to produce the requested information.

Sincerely,



Samir Y. Ghosn, MS, PE, CBO  
Deputy Community Development Director | Chief Building Official  
City of Newport Beach

- c: Rick Sacbabit, Engineering Services Branch Chief, FEMA Federal Insurance & Mitigation Administration  
Juliette Hayes, Risk Analysis Branch Chief, FEMA Region IX  
Seimone Jurjis, Community Development Director, City of Newport Beach