



DEVELOPMENT SERVICES

RULE INTERPRETATION DETERMINATION

Determination #: 2023-003

Title: Update to references of the effective dates of FEMA FIRM/FIS in Appendix F

Drafted by: Public Works Department, Storm Water Division

Rule in Question: Appendix F, Section 35-F108, Basis for Establishing the Areas of Special Flood Hazards

Department Action: The Director concurs with the requirements per FEMA to update the effective date references of the approved and updated FIRM and FIS for portions of the San Antonio River Basin. This RID is to bring the City into compliance with FEMA's NFIP requirements. The department is in agreement with staff's position indicated below.

Razi Hosseini, PE, RPLS
Public Works Director

Date

Michael Shannon, PE, CBO
Development Services Director

Date

Effective Date of Determination: Effective immediately

Please note RIDs often result in direct or related UDC amendments to codify the clarification addressed within the RID. RIDs can also be superseded by subsequent RIDs or UDC amendments. The Development Services Department will remove RIDs from the website when they are no longer valid.

Staff Analysis: The intent of this Rule Interpretation Determination (RID) is to provide clarification for customers and staff on the Public Works Department’s interpretation of the Unified Development Code (UDC) as it relates to the identification of Special Flood Hazard Areas (SFHAs). This RID will not impose any new or additional requirements, but rather it provides clarification on existing requirements to ensure consistency with Federal Emergency Management Agency (FEMA) standards.

In 2010, the City adopted Chapter 35, Section 35-F108, Basis for Establishing the Areas of Special Flood Hazards. The adoption of this section was part of the 2010 UDC Amendments. The purpose of this section is to define how the SFHAs are identified through FEMA’s Flood Insurance Rate Maps (FIRM), how they are utilized by the floodplain administrator, and how future updates would be adopted. This section referenced “The Flood Insurance Study (FIS) for Bexar County dated September 29, 2010,” which was the most recent FIS at the time of adoption.

Through the Bexar Regional Watershed Management (BRWM) committee, the San Antonio River Authority (SARA) has conducted updated flood studies for areas within the San Antonio River Basin that have led to updated FIRM panels and the FIS in portions of San Antonio City Limits and its Extraterritorial Jurisdiction (ETJ). The Physical Map Revision (PMR) was approved by FEMA and will become effective on July 19, 2023.

Staff Position and Interpretation: FEMA requires that the City’s Floodplain Ordinance reference the most recent FIS. Public Works has committed to clarifying 35-F108 to reference the most recent FIS and its updated title, so that the UDC will be changed to reflect the following:

The areas of special flood hazard identified by the Federal Emergency Management Agency in the current scientific and engineering report entitled, “The Flood Insurance Study (FIS) for Bexar County and Incorporated Areas dated ~~September 29, 2010~~ July 19, 2023”, with accompanying Flood Insurance Rate Maps (FIRM) and any revisions thereto are hereby adopted by reference and declared to be a part of this ordinance.”

For more information, please contact Sabrina Santiago, CFM, Floodplain Administrator, Capital Programs Manager, Public Works [Phone: (210) 207-0182, Email: Sabrina.Santiago@sanantonio.gov].

Future UDC Amendments: The affected section will be revisited during the 2027 UDC Amendment Cycle and revised as needed.