

From: **Perl, Craig** <cperl@auroragov.org>
Date: Thu, Sep 30, 2021 at 2:30 PM
Subject: CWCB Rulemaking for Regulatory Floodplains in Colorado
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Kevin-

I have reviewed the proposed Rules and Regulations, up to version 5, as well as watched video from the stakeholder meetings, and read through comments from other stakeholders. As Aurora's Floodplain Administrator, I support the proposed Rules and Regulations.

I do have one suggestion. The section below has been eliminated from Rule 7, Part J:

Where discrepancies appear between Regulatory Floodplain maps and water surface profiles, any regulatory water surface profile designated and approved by the Board shall take precedence over any corresponding flooded area map for the same stream reach or site location, unless a profile error is identified and substantiated.

This section was apparently eliminated to streamline and harmonize the written reports and maps section with FEMA's current standards and practices. However, this section also codified an otherwise unwritten rule in floodplain management. Perhaps this could fit in somewhere in Rule 11.

Thank you for providing an open and productive rulemaking process and for considering this input.

-Craig

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