

Ron W. Franz
Civil Engineering & Land Surveying

March 14, 2023

FEMA
C/O Tim Eriksen, City Engineer
City of Ukiah
300 Seminary Avenue
Ukiah, CA 95482

RE: Proposed changes to the FEMA Flood Insurance Rate Maps in and around the City of Ukiah, CA

Dear FEMA:

I am writing this letter in response to the proposed flood map changes in and around the City of Ukiah. I have reviewed the proposed new maps, primarily panels 06045C1512G, 1514G and 1518G dated preliminary April 22, 2022. I have also met with engineers and planners at the City of Ukiah and have had discussions with the hydrologist that the City is working with for their appeal. I have also spoken with some of the land owners that could be affected by these maps, many of them have owned these properties for well over 50 years.

I am a private licensed Civil Engineer and a licensed Land Surveyor in Ukiah. I have lived in the Ukiah community my whole life, of over 60 years. I have worked exclusively in this area as a private engineer and surveyor for nearly 40 years. I am extremely familiar with all of the streets, the creeks and the Russian River throughout this area and have done more than 500 Elevation Certificates in Mendocino County, most of them in and around the City of Ukiah. I've also processed about 50 LOMA's for homes and businesses in the area. I have also personally witnessed the largest flood in recorded history in this valley which occurred in December 2005 and have seen a couple of the other top 5 floods in this area back in the 1990's.

Based on my review of these proposed maps, on my local knowledge and expertise, on my discussions with property owners and other professionals, my general response to the proposed new flood limits and Base Flood Elevations is that these maps are horribly inaccurate and completely outrageous. If FEMA adopts these maps, the impact on the local community, homeowners, and businesses will be devastating. The proposed flooding limits is not even close to reality in most areas of the maps. In many areas on these maps it is completely physically impossible to flood as shown.

If FEMA proposes to update and revise the flood maps in this area, I strongly suggest that actual detailed on-site field work and investigations be done. FEMA engineers and hydrologists need to meet on-site with local experts to see how flooding actually occurs in this area prior to implementing any changes. Only then will they be able to generate flood maps that may represent reality. I would be glad to meet on-site with any engineer or hydrologist from FEMA to help them gather accurate information.

2335 Appolinaris Drive ----- Ukiah, California 95482
Phone 707-462-1087

I have attached to this letter a few things, a copy of the LOMA/LOMR that was done by a local engineer back in 1985 for the Brush Street area north of Orrs Creek. That LOMA was approved and accepted by FEMA and has been used as the basis of flooding for much of the development in that area. I assume that this would have to be honored by FEMA which would completely change the proposed new maps. I have also attached a few copies of portions of the proposed new maps with my misc. notes and comments. Below, I'll address a few of these maps.

Brush Street triangle (north of Orrs Creek):

This is an approximately 100 acre area with a mix of high density housing, light commercial and mostly vacant and fallow farm land. Much of the as-yet undeveloped area has been filled and raised to above the BFE in anticipation of future development. It lies north of Orrs Creek, east of the railroad and west of Highway 101. The 1985 LOMA/LOMR for this area accurately shows how flooding in this area may actually occur with ponding in much of this relatively flat area. I have worked on most of the parcels in this area and know all of the owners of the undeveloped portion. I spoke with 2 of the owners, both local people who have owned this property for well over 50 years. They both stated that none of this area flooded during the December 2005 flood, which was the largest flood in recorded Ukiah history. The only minor flooding and ponding occurred along a very narrow strip along the highway.

The proposed new flood map for this area shows all of the area north of Orrs Creek flooding with depths 3' or 4' deeper than the existing flood map. It also shows a water surface with fairly steep slopes heading east and generally matching with the water surface slope in the Orrs Creek channel. This is completely impossible. There is no way for flood water to get, over 2000 feet northerly, into this area and then continue flowing easterly at rates of about 8 feet per second and then just stop at the highway. Then once all of this water (probably about 10 times as much as is flowing in the creek channel) somehow just stops at the highway and then magically gets back to the creek channel before it crosses the highway. This will absolutely not happen. If this area floods at all, it will build up about a foot deep at the highway and then cross the highway more than 1000 feet north of Orrs Creek. It will never get back to the creek. Mapping in this area needs to change, flooding will never happen as shown.

Area between Orrs Creek and Gibson Creek:

Another general area of concern is the huge area between Orrs Creek and Gibson Creek. This area is mostly residential to the north and west and commercial on the east portion up to Highway 101. None, or very little, of this area is currently in the floodplain. The proposed new map shows all of it being added to the floodplain. The new map also shows a fairly steep water surface which means fairly fast moving water heading east. This massive volume of water then again, just stops at the highway and somehow finds it's way across the highway in 3 or 4 tiny little areas. Again, this is completely impossible. Also, none of this area flooded during the 2005 flood except for minor flooding along the creeks and maybe a little ponding adjacent to the

highway. I personally know the owners of the majority of the commercial property along Orchard Avenue and they stated that none of their properties, including JPPenny, Kohls and Home Depot got anywhere near flooding.

Doolin Creek:

Doolin Creek is a fairly small creek that flows through mainly residential areas. One area that I question is the large area that is proposed to be added to the floodplain between the railroad and South State Street. The floodplain generally, and accurately, follows along the creek channel in this area. The map shows the same situation where all of this new floodplain area is flowing quickly east and then just stops at the railroad. Then, again, somehow all of this water just goes north and ends up back in the Doolin Creek channel at a very small culvert crossing. This won't happen, if this area were to flood, it will build up a foot at the tracks and will then flow east across the tracks and down Talmage Road.

McClure Creek (west Talmage area):

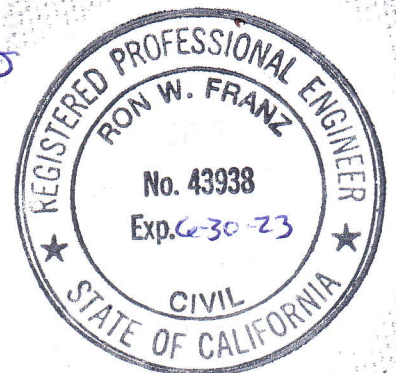
Was this area actually included in the new FEMA hydrolic study? The proposed new map shows a huge area being added to the floodplain between Russian River and McClure Creek. This area, about 70 acres, is a mix of residential and farm land. Where is this flooding coming from? From the river or from McClure Creek? Why is this new area being labeled as Zone A without Base Flood Elevations? If a study was done, FEMA must have flood levels. Some of this area along the river and directly along McClure Creek does flood but about 80% of this new area has never flooded and based on existing ground elevations, it will never flood. Also putting this in a Zone A instead of a Zone AE is horrible. Without Base Flood Elevations, homeowners in this area will not be able to prove whether they are in or out.

Please review my comments and the attached information and abandon these terribly inaccurate maps. The majority of the proposed flood map changes shown on these maps are just not correct and need to be changed. If these maps are adopted, the impact to this community will be devastating and will have unnecessary long lasting negative affects.

Sincerely

Ron W. Franz

Ron W. Franz
PLS 7173
RCE 43938





83-22
420-2
sec 05-16
NOT
FEDERAL EMERGENCY MANAGEMENT AGENCY

Washington, D.C. 20472

JAN 11 1985

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

IA-RA-RS (102) by _____
PLANNING DIVISION
Community: Mendocino County, CA 95424
Effective Date of
Revision: JAN 07 1985
Community Number: 060183
Suffix Code: B

Honorable John Cimolino
Chairman, Mendocino County Board of Supervisors
Mendocino County Courthouse, Room 113
Ukiah, California 95482

*Area north of Orrs
Creek and east of
Orchard Ave

Dear Chairman Cimolino:

Flood Insurance Rate Map (FIRM) and Flood Boundary and Floodway Map (FBFM) Panels 0784, 0792, and 0811 for your community have been revised to modify the elevations, flood boundaries, and zone designation of a flood having a one-percent chance of occurrence in any given year (base flood) along Orrs Creek upstream of U.S. Highway 101. The base flood elevations on the above-mentioned panels, presently shown as ranging from 601 feet National Geodetic Vertical Datum (NGVD) to 610 feet NGVD, have been modified and now range from 601 feet NGVD to 605 feet NGVD. The zone designation has been modified from Zone A7 to Zone A5. Flood boundaries for areas designated as Zone B have also been modified. These changes were made after reviewing data that were submitted by George C. Rau of Scherf & Rau, Inc., Ukiah, California. The revision amends the currently effective FIRM and FBFM dated June 1, 1983. The changes described above are shown on the enclosed copy of the map titled: "Orrs Creek FIRM Revision From Highway 101 to Ford Street," dated March 29, 1984, revised May 16, June 7, and November 5, 1984, prepared by Scherf & Rau, Inc., Ukiah, California. This Letter of Map Revision will be followed by a physical map revision.

This modification has been made pursuant to Section 206 of the Flood Disaster Protection Act of 1973 (P.L. 93-234) and is in accordance with the National Flood Insurance Act of 1968, as amended (Title XIII of the Housing and Urban Development Act of 1968, P.L. 90-448), 42 U.S.C. 4001-4128, and 44 CFR Part 65.

Public notification of modifications to base flood elevations and zone designations will be given in the Ukiah Daily Journal on January 17, 1985, and January 24, 1985. In addition, a notice of changes will be published in the Federal Register.

As required by the legislation, a community must adopt and enforce flood plain management measures to ensure continued eligibility to participate in the

National Flood Insurance Program. Therefore, your community must enforce these regulations using, at a minimum, the base flood elevations, zones, and floodways in the Special Flood Hazard Areas as shown on the FIRM and FBPM for your community, including the above-mentioned zone designation and zone boundary modifications.

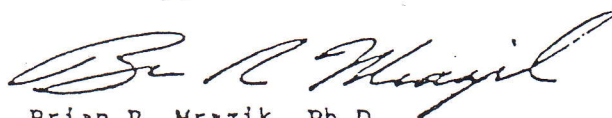
The community number and suffix code listed above will be used for all flood insurance policies and renewals issued for your community on and after the effective date listed above.

The revised base flood elevations, zone designation, and flood boundaries are effective on the date of this letter; however, within 90 days of the second publication in the Ukiah Daily Journal, a citizen may request the Federal Emergency Management Agency (FEMA) to reconsider this determination. Any request for reconsideration must be based on scientific or technical data. All interested parties are on notice that, until the 90-day period elapses, the determination by FEMA itself may be modified.

A Consultation Coordination Officer (CCO) has been designated to assist you with any problems that you may have concerning the new base flood elevations, flood boundaries, and zone designation. The CCO will be the primary liaison between your community and FEMA.

Any questions may be directed to your CCO. Your CCO is Robert Johnson, located at the FEMA Regional Office in San Francisco. He can be reached at (415) 556-9840; or, you can contact members of my staff at (202) 287-0700.

Sincerely,



Brian R. Mrazik, Ph.D.
Chief, Risk Studies Division
Federal Insurance Administration

Enclosure

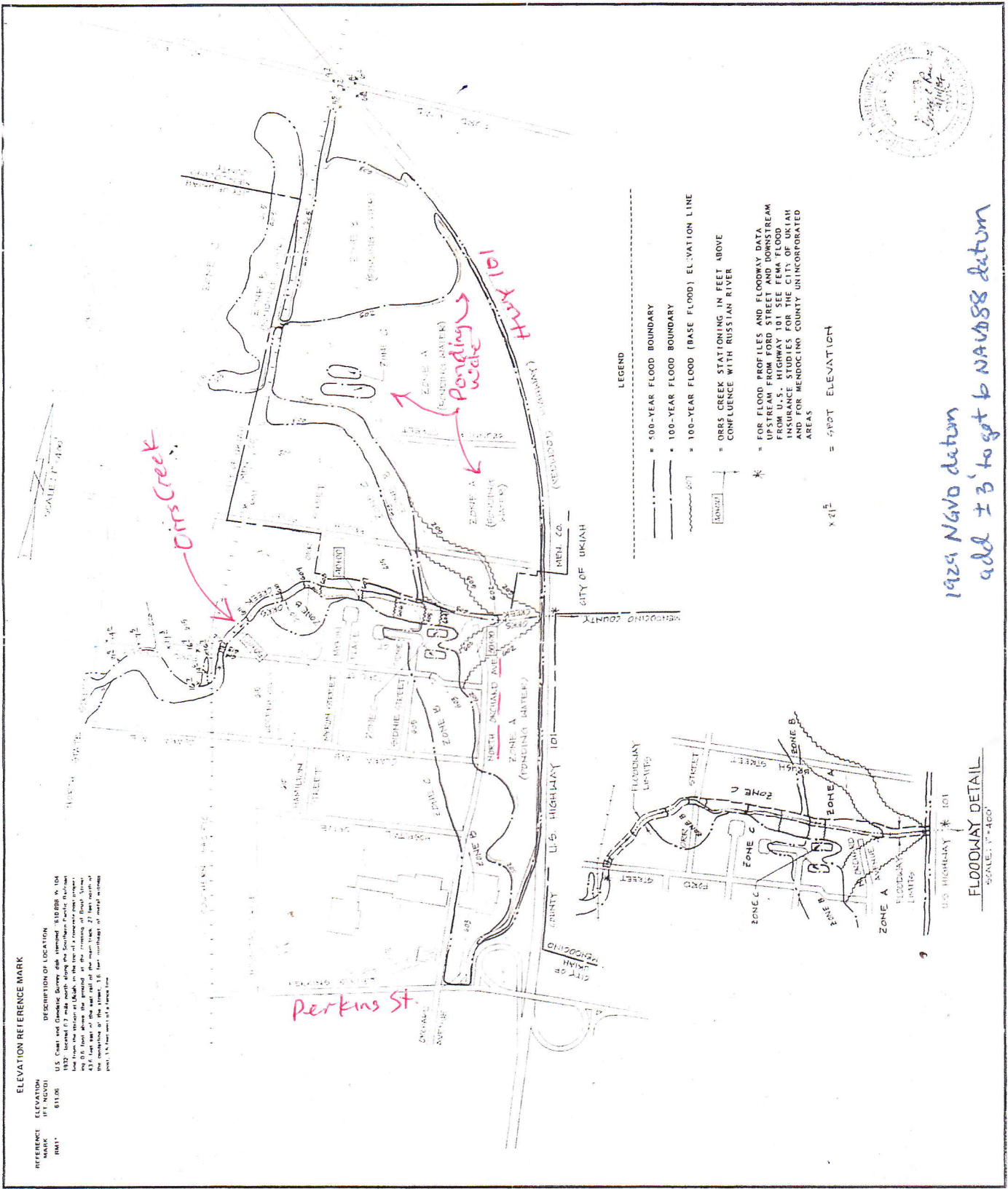
cc: Mr. George C. Rau, Scherf & Rau, Inc.
Mr. Victor Holanda, Director, Department of Planning and Building Services

REVISIONS	BY
5-16-04	B.F.
1. 50% REGULATORY REVIEW	
2. 100% REGULATORY REVIEW	
3. 100% REGULATORY REVIEW	
4. 100% REGULATORY REVIEW	
5. 100% REGULATORY REVIEW	
6. 100% REGULATORY REVIEW	
7. 100% REGULATORY REVIEW	
8. 100% REGULATORY REVIEW	
9. 100% REGULATORY REVIEW	
10. 100% REGULATORY REVIEW	

DRS CREEK FIRM REVISION FROM HIGHWAY 101 TO FORD STREET

SCHERF & RAU, INC.
 LAND SURVEYORS AND CONSULTING ENGINEERS
 100 NORTH PINE ST.
 PO BOX M UKIAH, CA (707) 462-6536

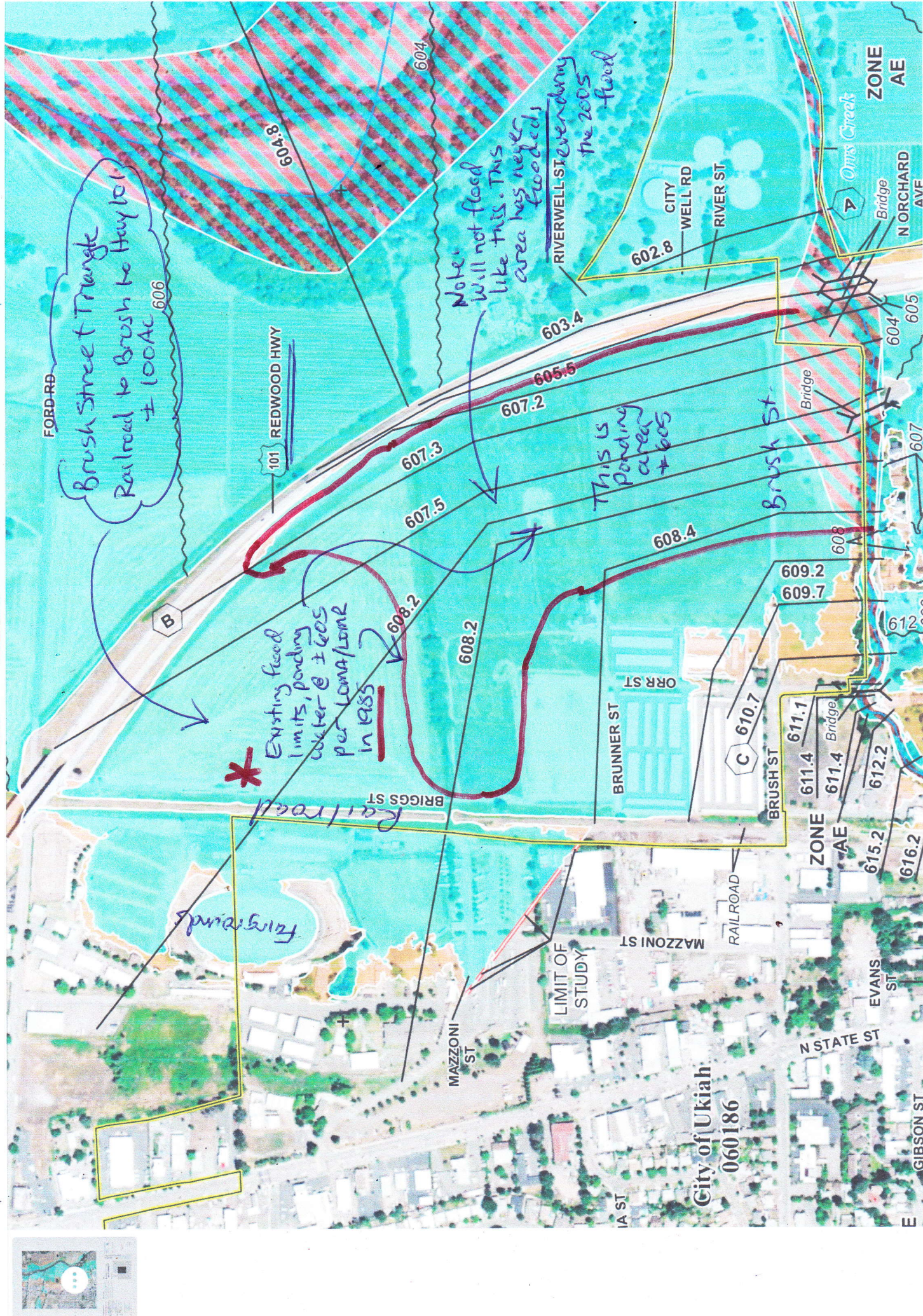
Date 9-21-04
 Scale 1" = 400'
 Drawn by FOX
 Job 53-72
 Sheet 1
 of 1 Sheets



19251 NAVO datum
 add ± 3' to get to NAVD83 datum

pdf in c:\flood maps\ orrs creek - rau

06045C1512G (1 of 11)





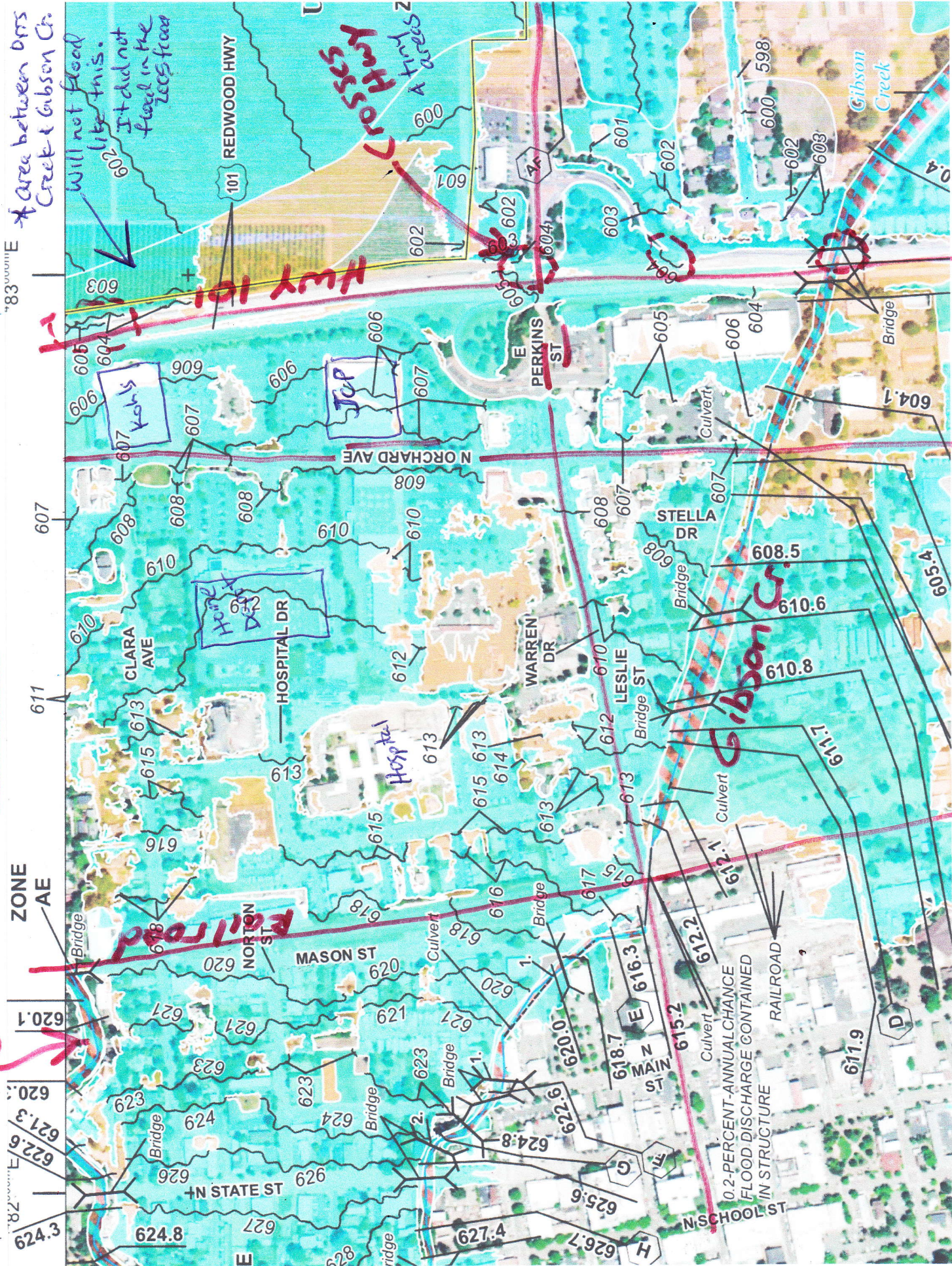
06045C1514G (2 of 11)



*Area between Drts Creek & Gibson Cr.

Will not flood like this. It did not flood in the 2005 flood

Drts Creek



ZONE AE

0.2 PERCENT ANNUAL CHANCE FLOOD DISCHARGE CONTAINED IN STRUCTURE RAILROAD

06045C1514G (2 of 13)

Doolin Creek

