



March 14, 2023

Attn: Eric Simmons, Engineer
111 Broadway, Suite 1200
Oakland, California 94607

RE: Appeal of Preliminary Flood Insurance Rate Map and Flood Insurance Study for The City of Ukiah Including the Areas Near Orrs, Gibson and Doolin Creeks

Dear Mr. Simmons:

The City of Ukiah is appealing the preliminary Flood Insurance Rate Map (FIRM) and associated Flood Insurance Study (FIS) report for the City of Ukiah, California, as they relate to the base flood elevations in the vicinity of Orrs, Gibson and Doolin Creeks, shown on FIRM panel 06045C1514G. This appeal is filed in accordance with Part 67 of Title 44 of the Code of Federal Regulations (CFR) to ensure that the FIRM reflects accurate information and is consistent with FEMA guidelines and specifications. The City of Ukiah and the County of Mendocino finds that the base flood elevations depicted on the preliminary FIRM for Orrs and Gibson Creek area are technically incorrect on the basis that the hydraulic methodology was not applied correctly and the analysis contains indisputable mathematical errors.

The support for this appeal is found in the GHD Memo attached (Attachment 1). GHD completed a review of the hydraulic analysis and identified several areas where additional clarification is needed to better understand the analysis's accuracy and precision. In addition, the model setup for Orrs Creek, Gibson Creek, and the intermediate floodplain has resulted in what appears to be discrepancies in the resulting base flood elevations.

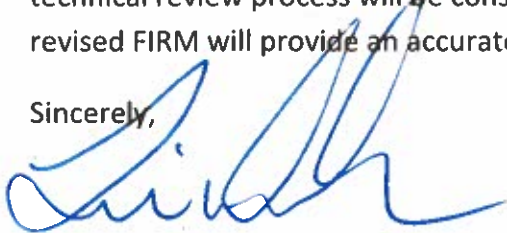
This appeal also contains further technical concerns from Ron Franz, PE, a local professional Engineer and Surveyor. Mr. Franz has filed more elevations certificates and Letter of Map Amendments (LOMA)s in our region than any other professional. Mr. Franz has sent a letter, that contains technical information, (Attachment 2) to the City of Ukiah that we are including with this appeal that deserves the attention and responses to the questions asked of FEMA.

The third attachment (Attachment 3) to this appeal is the letter that the City of Ukiah has sent to Congressman Huffman. This describes some of the disastrous impacts of the proposed FEMA actions. Although it is clear that this information is not relevant to the appeal process, it is extremely relevant to the members of this community and should be taken very seriously.

In summary, the City of Ukiah is submitting data and information demonstrating that the depiction of the base flood elevations on the preliminary FIRM for the City of Ukiah area, in the Ukiah area and outside the City limits in the preliminary FIS, are technically inaccurate. In accordance with 44

CFR 67, FEMA should take appropriate measures to revise the base flood elevations on the FIRM and the associated flood profiles in the FIS. The City of Ukiah requests assurances that FEMA's technical review process will be consistent with acceptable quality control standards, and that the revised FIRM will provide an accurate representation of flood risk.

Sincerely,



Tim Eriksen PE.

City Engineer and Director of Public Works



Attachments:

1. GHD Memo technical basis for appeal
2. Ron Franz Letter and technical issues
3. City of Ukiah letter to Congressman Huffman