



September 20, 2024

Eric Simmons, Engineer
U.S. Department of Homeland Security
FEMA Mitigation Division, Region 9
1111 Broadway, Ste. 1200
Oakland, CA 94607

Dear Mr. Simmons:

The City Council of the City of Ukiah respectfully submits this letter to provide comments related to the most recently proposed floodplain maps released by FEMA in July 2024.

Given direct observations of flood events by city council members living in the proposed floodplains, the relatively few flood insurance claims filed since 1978, and initial modeling conducted for the City by experts in hydrology and hydraulics, we believe the analysis utilized by FEMA to arrive at the proposed floodplains for Ukiah may be inaccurate.

Vice-Mayor Douglas Crane:

“I have owned the 1295 Yokayo Ct lot since about mid 70's and known the neighborhood and neighbors around 1295 Yokayo Ct for decades before. There has been no flooding of what is now 1295 Yokayo Ct to my knowledge in over 75 years. There has been no flooding over the box culverts on Laural Ave. since they were constructed approximately 40 years ago.”

Council Member Susan Sher:

“I live at 307 Clara Avenue in Ukiah in what is known as the Wagenseller Neighborhood. I purchased my home in September 1989 and have lived there continuously ever since. After several years of drought, Ukiah experienced fairly heavy rainfall the past two winters. I live approximately two blocks from Orr Creek where the creek flows beneath a small bridge called the Orr Street Bridge. Even after the heaviest rainfall, the creek had not risen even close to its banks. On those walks, I enjoyed seeing the fullness and swift movement of the creek with no concern for flooding. In fact, in the 35 years I have lived in the Wagenseller Neighborhood, I am not aware of Orr Creek ever flooding.”

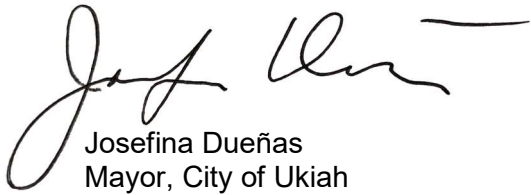
These council members' observations are corroborated by recent preliminary hydrological and hydraulic analyses undertaken by the City, particularly with regard to 10-year storm event data. (Please see the City of Ukiah's technical letter, dated September 20, 2024).

Faced with the growing impacts of climate change, the City Council desires floodplain maps that are accurate and complete to appropriately protect Ukiah residents and businesses from flood hazards now and in the future. Given that an inaccurate floodplain map will disproportionately affect a large percentage of Ukiah's lowest income residents- who would have to pay for unnecessary flood insurance- precise data modeling is especially important. Towards this end, at our September 18, 2024, regular meeting, by a 5-0 vote, the City Council moved to direct City staff to pursue the creation of maps- through hydraulic and hydrology studies- for determining the 100-year floodplain.



We sincerely hope FEMA will collaborate with the City on this effort. Thank you for your review of our comments. We look forward to working with FEMA in the near future.

Sincerely,

A handwritten signature in black ink, appearing to read "Josefina Dueñas". The signature is fluid and cursive, with a long horizontal stroke extending to the right from the end of the name.

Josefina Dueñas
Mayor, City of Ukiah