



Wednesday, March 15, 2023

The Honorable Jared Huffman  
200 South School Street  
Ukiah, CA 95482

Dear Congressman Huffman,

As you are likely aware, the Federal Emergency Management Agency (FEMA) has proposed updated flood maps for Mendocino County and the City Ukiah. These maps revise flood hazard designations along Orrs Creek, Gibson Creek, Doolin Creek and other tributaries across the Ukiah Valley. As conveyed, these updates greatly and curiously expand the existing floodplain hazards, thereby increasing residential and commercial insurance requirements, as well as the financial burdens for residents and businesses. Even though it has been some time since the last update to the City's flood maps, no significant new developments in or near existing flood zones have been facilitated, nor have changes to flood protection systems (e.g., levees) developed. While drought continues, no other significant environmental changes have occurred that would substantiate such a considerable change in known flood hazards.

Unfortunately, those most impacted by these revisions will be the least able to absorb the associated costs. For middle-class and low-income homeowners, even slight changes to monthly expenses could have substantial budgetary consequences. These impacts will be most pronounced for low-income and borrowers with lower credit scores, since the added financial burden of insurance reduces the ability of disadvantaged households to borrow.<sup>1</sup> Increased flood insurance mandates will also lead to reductions in residential lending activity, which will stymie appropriate infill development and new construction. Creating additional barriers to infill development is a mistake, as the City of Ukiah must be well-positioned to encourage this type of growth to limit regional sprawl and non-sustainable land uses increasingly subject to fire hazards within the wildland urban interface.

An important objective of the National Flood Insurance Program (NFIP) is to break the cycle of flood damage but the City of Ukiah has experienced relatively claims since commencing participation in the NFIP in 1982. Per the FEMA NFIP Insurance Mitigation Division, only 60 documented losses totaling \$1,041,230.16 across the entire 95482 zip code have been identified. This implies that the impacts of flooding within City limits are relatively constrained, as this zip code extends far-beyond City limits and includes large swaths of unincorporated Mendocino County.

Upon review and consultation, most of the areas subject to revised designations are not historically associated with flood hazards, even during notable events, such as those in 1994 and 2005/2006 (DR – 1628 CA). The impacts to mobile home park residents are concerning, as the City of Ukiah has taken efforts to preserve existing mobile home parks as affordable housing. Specifically, the revised flood hazard maps would impact the Manor Oak Mobile Home Estates and additional mobile home parks along East Gobbi Street to increased insurance requirements. FEMA published its Affordability Framework in 2018, but it is unclear how or if this framework would protect or assist residents, particularly those with modest incomes.

We encourage you to review the technical response that has been submitted in coordination with the County of Mendocino and assist the City of Ukiah in addressing concerns with these proposed flood map revisions. We believe that, based on technical merits, our appeal is fully justified. As conveyed, the expansion of flood hazard areas would be tremendously impactful to residents and businesses, especially those who reside in mobile home parks. Thank you for your consideration and review of these concerns.

Sincerely,

Mari Rodin, Mayor, City of Ukiah

**Enclosed:** City of Ukiah FEMA Map Revision Review; GHD and Northern Hydrology & Engineering; March 8, 2023

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<sup>1</sup> Unintended Consequences of "Mandatory" Flood Insurance Kristian S. Blickle and João A. C. Santos Federal Reserve Bank of New York Staff Reports, no. 1012 April 2022 JEL classification: G21, G28, Q5, Q54