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Michaela Brown, Director

Watershed Protection District
Glenn Shephard, Director

September 5, 2017

Mr. Edward Curtis, P.E.
Risk Analysis Branch
FEMA Region IX
1111 Broadway, Suite 1200
Oakland, CA 94607

**Subject: Technical Review of the Preliminary Flood Insurance Rate Maps
for the Coast of Ventura County, California**

Dear Mr. Curtis:

The coastal communities of Ventura County, California, appreciate FEMA's continued efforts to better define the coastal flood hazard by using the California Coastal Analysis and Mapping Program (CCAMP). We are committed to working closely with FEMA to generate Flood Insurance Rate Maps (FIRM) that best reflect the coastal flood hazard in Ventura County.

Since the September 30, 2016, release of the Preliminary Flood Insurance Rate Map (PFIRM), the cities of Ventura, Oxnard, and Port Hueneme, as well as the Ventura County Watershed Protection District (District) representing the unincorporated coastal areas of Ventura County, have jointly hired Moffatt & Nichol to conduct a detailed technical review of the PFIRM maps and the supporting materials (Intermediate Data Submittals – IDS). According to the review, the local communities believe changes and corrections need to be made to the maps or supporting documents to correct errors or improve the quality of the final products. The following summarizes the technical comments and appeals documented by the August 2017 Moffat & Nichol report that need FEMA's resolution and correction to the preliminary maps:

1. AE zones are erroneously mapped at the coastal areas at the Santa Clara River mouth (between transects 44 and 45) and at the Santa Clara River overflow coastal zone (between transects 46 and 47).
2. The 35-foot minimum mapping distance criteria may be applicable to paper maps. However, since FEMA mapping products have embraced digital FIRM (DFIRM) in the last decade or so, the physical mapping scale limitation may place a heavy burden on local floodplain managers. According to Section D.4.9.4 of FEMA's "Guidelines for Coastal Flood Hazard Analysis and Mapping for the Pacific Coast of the United States," local communities request that secondary/overtopping VE zones be mapped, even though the total overtopping width is less than 35 feet.



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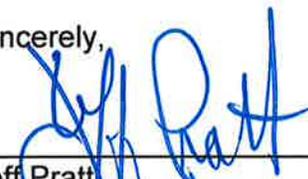
3. The roughness factor—due to the presence of cobbles, offshore reefs, and rock from failed revetment structures—was not considered. According to Section D.4.7.3.2 of the guidelines, local communities request that a composite roughness factor be used.
4. Local communities believe starting wave run-up analysis at a more shallow depth (around -15 to -20 meters instead of -40 meters) is more appropriate and would generate more accurate Base Flood Elevations (BFEs).
5. According to Section D.4.9.6 of the FEMA guidelines, local communities request that the difference of BFEs between neighboring transects be reduced. This is particularly true for transects separating neighboring residential properties.

The Cities of Ventura, Oxnard, and Port Hueneme—as well as the County of Ventura—are pleased to present to you the “*Final Report for Technical Review of FEMA CCAMP for Ventura County*” prepared by Moffat & Nichol, our consultant. We request that FEMA address these comments before finalizing the mapping products.

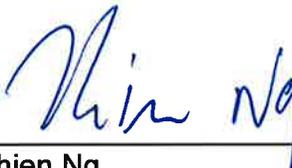
In addition, we are forwarding to you an appeal challenging the flood hazard determination at the address of 3452 West Pacific Coast Highway.

If you have any questions, please contact me at 805-654-2073 or Sergio Vargas, Deputy Director, at 805-650-4077 or via e-mail at sergio.vargas@ventura.org.

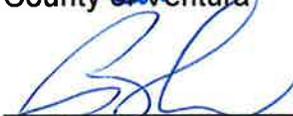
Sincerely,



Jeff Pratt
Public Works Agency Director
County of Ventura



Thien Ng
Interim Public Works Director
City of Oxnard



Brad Starr
Floodplain Manager
City of Ventura



Don Villafana
Public Works Director
City of Port Hueneme

SV:VS/gjm

Attachments: *Final Report for Technical Review of FEMA CCAMP for Ventura County Wave Run-up & Coastal Hazard Analysis, 3452 West Pacific Coast Highway, Ventura County, California*

cc: John Zaragoza, Chair, Ventura County Board of Supervisors
Glenn Shepard, Director, Ventura County Watershed Protection District
Sergio Vargas, Deputy Director, Ventura County Watershed Protection District
Mark Shellnut, 3452 West Pacific Coast Highway

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