

# VENTURA COUNTY



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Agency Director

## WATERSHED PROTECTION DISTRICT

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November 29, 2007

COPY

Ms. Sally Ziolkowski, Director  
Federal Emergency Management Agency, Region IX  
Federal Insurance and Mitigation Division  
1111 Broadway, Suite 1200  
Oakland, CA 94607

Jeff Pratt  
District Director

Gerhardt Hubner  
Water/Environmental Resources

Peter Sheydayi  
Design/Construction

Sergio Vargas  
Planning/Regulatory

Tom Lagier  
Operations/Maintenance

**Subject: Appeal of the Federal Emergency Management Agency (FEMA) Flood Insurance Study for Ventura County and Incorporated Areas, Flood Insurance Study Number 06111CV000A**

Dear Ms. Ziolkowski:

The Ventura County Watershed Protection District (District) is appealing the Calleguas Creek Watershed portion of the referenced FEMA Flood Insurance Study (FIS) Update. This portion (Nolte Study) of the FIS update for Ventura County was accomplished by Nolte Associates, Inc, San Diego, California as part of a cooperative technical partnership with FEMA.

A recent review of the Nolte Study has raised concerns with the accuracy of the floodplains and floodways depicted in various locations of the watershed study area. Specifically, the areas include the Arroyo Santa Rosa, Arroyo Santa Rosa Tributary, and Peach Hill Wash sub watersheds.

In these three areas, Nolte delineated floodplains and/or floodways wider than the District believes actual conditions should warrant. In some locations, flood flows that should be contained within channel limits are shown as overflowing the channels and inundating adjacent land. The District believes this is the result of a failure to accurately depict improved channel conditions and/or to field verify existing conditions.

We strongly believe that the following discrepancies and errors noted in our review of the Nolte study have led to the incorrect modeling of the floodplains and/or floodways.

- Incorrect coding of channel geometries
- Incorrect selection of channel roughness coefficients ("n" values)
- Incorrect modeling of flow regime in certain channel reaches, i.e. sub-critical vs. super-critical flows.

Ms. Sally Ziolkowski  
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Page 2 of 2

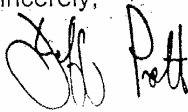
A detailed description of the specific discrepancies is included in the attached District report titled, "*Appeal on Federal Emergency Management Agency Calleguas Creek Flood Insurance Study, Regarding Floodplain and Floodway designations for Arroyo Santa Rosa, Arroyo Santa Rosa Tributary, and Peach Hill Wash.*"

This report includes a District re-analysis of the areas noted using appropriate channel geometrics, channel roughness coefficients and flow regimes, channel and water surface profiles, cross-sectional information, 1998 Letter of Map Revision for Arroyo Santa Rosa Overflow and Arroyo Santa Rosa Tributary, as-built drawings for channel improvements along the Arroyo Santa Rosa, Arroyo Santa Rosa Tributary and Peach Hill Wash, and a comparison of the 2005 and 1998 FEMA floodplain and floodways.

Based on the findings of this review and re-analysis, the District is requesting that FEMA review the "Nolte Study" and revise as necessary the floodplains and/or floodways there in depicted to reflect actual conditions, including hydraulic and topographic parameters.

Should you have any questions or need additional information, please contact me at (805) 654-2040, or Sergio Vargas at (805) 6540-4077.

Sincerely,



Jeff Pratt, P.E.  
Director

Attachment

C: Supervisor Linda Parks, District 2 (w/o attachment)  
Supervisor Peter Foy, District 4 (w/o attachment)  
Yugal Lall, City of Moorpark (w/o attachment)

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