

3152 Shad Court  
Simi Valley, CA 93063  
July 10, 2008

Mr. Dan Flory, Manager  
FloodSAFE Program  
Department of Water Resources  
P.O. Box 942836  
Sacramento, CA 94236-0001

Re: Public Review and Comment Period on Draft FloodSAFE  
Strategic Plan--July 25, 2008 Deadline.

Dear Mr. Flory:

This letter is a follow-up to my July 8, 2008 letter's  
comments on the aforementioned document.

Mr. Flory, "the general public" must be added to the  
"Other Stakeholders" paragraph on Page 17. "Many other  
groups, such as non-governmental organizations and  
businesses, and interested individuals" or "and members of  
the public" "have strong interests in accomplishing the  
FloodSAFE objectives and expertise to offer, and will have  
frequent opportunities to participate in FloodSAFE  
activities..."

Mr. Flory, the third bullet point on Page 17, under  
"Other Stakeholders" must also include a bullet point for  
"Participate regional integrated planning efforts." As a  
member of the general public, I have opposed integrated  
planning efforts by local government agencies and the  
State/Regional Water Boards because of inaccurate and  
incomplete documents, and for approving ill-advised and  
ill-conceived decisions. Just having a "Support regional  
integrated planning efforts" bullet point has the tendency  
to weed out legitimate public concerns.

Mr. Flory, number 10 (Provide Equitable Access to  
Decision Process) on Page 25 needs clarification. While it  
is stated "All communities should be provided access and  
opportunity to participate in the decision making processes  
that affect them", it must be made clear that communities  
(cities/tribes/towns, and counties) must actively involve  
the citizenry. The City of Simi Valley, when it applied to

the State for General Fund/Native American CDBG Program funds to cover the costs of regional storm water detention basins(dams) did not have the staff report for the City Council agenda item for public review in a timely manner. I did not get a copy of the staff report until the day after the meeting. The City reported on its application that there was community participation; not by the citizenry. Also, when one of the FEMA's environmental evaluation/assessment documents was compiled for a proposed regional storm water detention basin, it was stated that there was no opposition to the project. FEMA and the City of Simi Valley knew full well that I had opposed the 6 to 11 dams project because there are no flood warning systems conditioned, and future citizens benefiting from these improvements would be taxed even though the City of Simi Valley and the County of Ventura were already levying detention basin fees through the Ventura County Flood Control District(now Ventura County Watershed Protection District)'s Benefit Assessment Program.

Mr. Flory, because of accounting irregularities with the FEMA allocated funds for the regional storm water detention basins project in the City of Simi Valley's and the County of Ventura budgets, I requested investigations by the FEMA Inspector General(now U.S. DHS Inspector General). To date OIG Complaint Number: 0403210 is open. Only one of 6 to 11 regional storm water detention basins has been built, and the \$7 million to \$10 million is unaccounted for.

Mr. Flory, the FEMA Inspector General's office found merit with my complaint on the City of Simi Valley's federal funds application for the Tapo Canyon/Gillibrand Canyon Water Treatment Plant, but the Regional Attorney General's office refused to prosecute the case.

Mr. Flory, my federal government Freedom of Information Act requests for copies on the Tapo Canyon/Gillibrand Canyon Water Treatment Plant Inspector General's office investigation are not followed through, nor on the regional storm water detention basins since the investigation has been stalled for years.

Mr. Flory, I disagree with the statement "Whenever possible, offer assistance to disadvantaged communities to help them participate in relevant public processes and funding decisions"(Page 25, number 10). Disadvantaged communities must have the same access to assistance to

participate in the public processes and funding decisions as do non-disadvantaged communities. This is why there is an imbalance in the successful integration for regional water quality, water resources, and flood management programs. Disadvantaged communities must be used by the non-disadvantaged communities to garner grant funding.

Mr. Flory, with regards to Section VII. Implementation Framework, as far as the "Inform and Assist Public" FloodSAFE Program implementation activity goes (Page 26), all of the public comment submittal avenues (mail, walk-up to office, facsimile, E-mail, courier service, telephone) must be allowed. I don't always have transportation to get to the post office, and I don't like to E-mail since a signature does not appear on the submitted work, but I can fax capability to send information even to Washington, DC.

Mr. Flory, as far as the "Finance Plan" under Section VII. Implementation Framework, is concerned, the short statement must be expanded upon (Page 32).

Mr. Flory, the public trust that is critical to the success of the FloodSAFE Program's "Track and manage financial resources in a manner that builds public trust and meets bond accountability expectations" (Page 36, under Critical Success Factors, number 10) calls for the inclusion of the general public, members of the public, or interested individuals; and participation in the regional integrated planning efforts under "Other Stakeholders" (Page 17); as well as speaks volumes for allowing comments to be forwarded through means of all submittal tools (Page 26). These, and consistency, as well as commitment will illustrate to Governor Arnold Schwarzenegger's constituents that that his "open government" policy is alive and well.

Mr. Flory, it is stated on Page 37, in the second sentence, under Section VIII. Next Steps, that "The public had an opportunity to comment on the plan at X meetings and workshops throughout California." Also include a statement about those who did not attend meetings or workshops, but by finding the FloodSAFE Program on the website had this type of opportunity to participate in the process.

Mr. Flory, the Table 1 title on Pages 20 and 21 has an error. It reads "Foundational Objectives and the Goals the Help Satisfy". The word "they" between Goals and Help instead of "the" seems to fit the intended purpose.

Mr. Flory, will the Final FloodSAFE Program Strategic Plan have a cover sheet?

Mr. Flory, the name of the dam inundation mapping program mentioned in my July 8, 2008 letter was called the Dam Inundation Mapping and Emergency Procedures (DIMEP) Program at least back in 2003 before budget cuts.

Mr. Flory, if the FEMA soil compaction rate requirement is still more stringent, then this is what the DWR and its Partners must abide by.

Mr. Flory, recently I have been reading that the FEMA 500-year flood concept is misleading. Changes are being proposed outside of the Agency. How would this impact the FloodSAFE Program projects? Or, will it impact them?

Mr. Flory, any agreements signed by the DWR and its Partners must have all t's crossed and i's dotted, and the signatories must be the cities mayors, and chairs of the counties board of supervisors for the local governments, not the directors of public works, or even the cities managers, nor the counties chief executive officers.

Sincerely,

A handwritten signature in cursive script that reads "Mrs. Teresa Jordan". The signature is written in black ink and is positioned above the typed name.

Mrs. Teresa Jordan

3152 Shad Court  
Simi Valley, CA 93063  
July 8, 2008

Mr. Dan Flory  
FloodSAFE Program Manager  
Department of Water Resources  
P.O. Box 942836  
Sacramento, CA 94236-0001

Re: Draft FloodSAFE Strategic Plan--Public Review and  
Comment Period; July 25, 2008 Deadline.

Dear Mr. Flory:

As a lay person, I found the aforementioned document to be extremely reader friendly, and well compiled.

Mr. Flory, while there are many interesting matters to address, I am focusing my comments on the FloodSafe Program's "Inform and Assist Public" action because it also covers two other program actions: "Improve Emergency Response" and "Improve Flood Management Systems".

Mr. Flory, for over a year, I have addressed State Water Resources Control Board plans and policies relative to the State and Regional Boards' 2008-2012 Strategic Plan Update, recycled water, NPDES permits, water quality, water rights, and wetlands/riparian habitat issues. During the same time period, I also addressed the Los Angeles Regional Water Quality Control Board(LARWQCB)'s The Boeing Company Santa Susana Field Laboratory(SSFL) NPDES Permit, the Ventura Countywide MS4 NPDES Permit, and my City's NPDES Permit. For years, I have addressed my City's Preliminary Base Budgets, General Plan Housing Elements, and HUD required Consolidated Plans and related documents. Years ago, I addressed my City's update of its Emergency Plan, my City's and County's Draft Disaster Mitigation Act 2000 plans, the State's Emergency Plan and Water Plan Update, the Ventura County Watershed Protection District's Flood Mitigation Plan, the FEMA/Ventura County/Nolte Preliminary Flood Insurance Study(FIS) and Preliminary Flood Insurance Rate Maps(FIRMs), and the FEMA/Simi Valley FIS and FIRMs, as well as the 2003 Wildfires Siege State Blue Ribbon Fire Commission. While most of these documents are well

compiled, not all are reader friendly, or complete, or accurate. In some of the documents mentioned, and others not listed, these shortcomings are minor, and in some documents they are major.

Mr. Flory, because the Department of Water Resources (DWR) will lead the state, federal, and local agencies (Partners) in this great undertaking--which by the way is an outstanding move on Governor Arnold Schwarzenegger's part--it is crucial that the Agency is truly committed to the public in implementing this integrated flood management and emergency response system program. How often I have read and heard words to this effect and government at all levels falls short. Empty words will not improve "public safety", protect and enhance "environmental and cultural resources", and support "economic growth" because they will not help reduce "the probability of destructive floods", promote "beneficial floodplain processes", and lower "the damages caused by flooding", nor result in "A sustainable integrated flood management and emergency response system throughout California"(top of Page 5; II. Vision).

Mr. Flory, all the money in the world can be thrown into the pot and still not lead to success when the public participation process is violated along any link of the chain--city/tribe/town, county, state and federal governments--or any combination of links, or all links. the Federal Emergency Management Agency(FEMA)'s shortcomings with Hurricane Katrina are the biggest example of the catastrophe that failure of one link can manifest. The FEMA's full potential and credibility have not quite recovered because in major disasters the Agency is still the last line of defense instead of the second in flood and fire incidents, vacancies still remain to be filled, plans are not well compiled, its map modernization program is lagging behind horribly, incompetence has not been reigned in, and the public participation process is violated.

Mr. Flory, since DWR will be partnering with FEMA, counties, and cities/tribes/towns, the Agency must make it quite clear that none of these entities are to violate the public participation process to any extent.

Mr. Flory, the County of Ventura to date has not responded to my January 26, 2005 letter on the Draft Multi-Jurisdictional Hazard Mitigation Plan. This document is

incomplete and inaccurate, yet the Ventura County Board of Supervisors approved the Final Plan in the same state. This document is crucial to applications for federal and state flood mitigation, and NPDES permit projects grants.

Mr. Flory, the Ventura County Watershed Protection District to date has not responded to my January 20, 2005 letter on the Draft Flood Mitigation Plan. This document is incomplete and inaccurate, yet the District Board approved the Final Plan in the same state. This document is crucial to applications for federal and state flood mitigation, and NPDES permit projects grants.

Mr. Flory, the Federal Emergency Management Agency (FEMA), my City, and County to date have not responded to my February 6, 2006 and February 14, 2006 letters on the current Draft FEMA/Ventura County/Nolte Preliminary Flood Insurance Study (FIS), and Draft Preliminary Flood Insurance Rate Maps (FIRMs). These documents are incomplete and inaccurate, yet the FEMA might approve them in this state around August 2008.

Mr. Flory, I contacted the United States Army Corps of Engineer when the FEMA/Ventura County/Nolte FIS and FIMRs process was just beginning asking for the Agency's help since I was getting nowhere with any of the aforementioned entities. I received a telephone call relative to help being forthcoming, but to date nothing has happened.

Mr. Flory, my County does not respond to inquiries on Board and District agendized matters that impact the health and wellbeing of my City's citizens.

Mr. Flory, my City does not respond to my inquiries in my letters on the Preliminary Base Budgets that cover matters that impact its people's health and wellbeing.

Mr. Flory, the aforementioned silent treatment does no one any good for the sake of garnering federal and state funds because if a Bandaid approach has led to the levee breaks in the Gulf Coast states and along the Mississippi's communities, a no Band-Aid what-so-ever planning approach leaves no room for improvement or survival. This sort of activity on any entity's part should be made a crime since people are left to believe that they are in good hands when in reality they are left to fend for themselves.

Mr. Flory, I will for now waive my violations of the public participation process activism with regards to the FloodSAFE Program's Strategic Plan public comments on the Draft notice--"No written responses to comments will be provided"--since "All comments received will be posted on this website and considered during final editing of the Strategic Plan." I had no qualms over the DWR just posting submittals by commentators on the Water Plan Update because I could get some of my questions answered by reading others comments. I will ask, though, that the FloodSAFE Program's comments remain posted on the DWR's website like the Water Plan Update's comments are, or be archived. The various changes that have taken place this year with regards to the State Water Quality Control Board and Regional Boards have caused the loss of a lot of pertinent information, so it would be disastrous if changes to the DWR's website also led to loss of pertinent information since it is stated on Page 6 that "As conditions in California continue to change in the future, integrated flood management systems must be reevaluated and adjusted." There are many lay persons who have a wealth of knowledge and solutions that the local, state and federal governments have not tapped into because of jobs, raising families, etceteras.

Mr. Flory, since Northern California is integral to the water supplied to Southern California, I feel that those FloodSAFE Program projects located in that region must take priority over Southern region improvements that are not detrimental to life and property, but are window dressing, or a means to garnering funding to shore up general plans.

Mr. Flory, the Governor's Office of Planning and Research must also have a large part in the FloodSAFE Program process since government codes dictate that this Agency must notify local governments who have not updated their General Plans for eight(8) years, and are to request involvement of the State Attorney General when local governments General Plan are not updated for ten(10) years. This is one of the biggest reasons why flood management and emergency response are broken in some communities throughout the State. Also, the evacuation information in emergency plans is lacking, or none existing.

Mr. Flory, DWR must take into consideration that not everyone has access to a computer because of homelessness, income is limited, no access to transportation, or the choice has been made not to deal with modern advances. So,

notices in the local newspapers by the Agency and/or its Partners are a must as this process moves along. Also, provisions must be made in order to involve the visually impaired population, and the information must also be provided in different languages since lack of communication has led in the past to problems evacuating people, or helping them prepare for emergencies. Then, too, people these days are depending on cell phones, and other modern communication advance tools. An informational program geared toward those citizens must be considered.

Mr. Flory, the mapping program for dams (delineation) that the State had for years must also be staffed and funded ASAP as it was for decades, but maximized to make the FloodSAFE Program progress quicker and succeed. Perhaps the gentleman who did the work can be hired as a consultant, if not already done--to teach, or undertake the work himself.

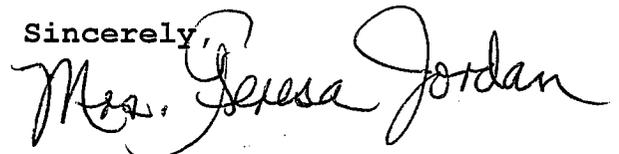
Mr. Flory, if projects are scaled down, they must not jeopardize life and property. So, no cutting corners.

Mr. Flory, as far as subventions are concerned, the applicants must certify that the information is the truth, the whole truth, and nothing but the truth. There must be no room for "to the best of my knowledge" statement.

Mr. Flory, enclosed are copies of my January 20, 2005 letter (25 pages) to Flood Mitigation Plan Coordinator on the Draft Multi-Jurisdictional Hazard Mitigation Plan; January 26, 2005 letter (27 pages) to UBS Corporation on the Draft Flood Mitigation Plan; and February 6, 2006 letter (8 pages) and February 14, 2006 letter (10 pages) to Mr. Mike Sedell on the FEMA/Ventura County/Nolte current Draft Preliminary Flood Insurance Study (FIS), and Preliminary Flood Insurance Rate Maps (FIRMs).

Mr. Flory, May God Bless DWR and Its Partners Efforts, Governor Arnold Schwarzenegger, and, most especially, Californians.

Sincerely,



Mrs. Teresa Jordan

[REDACTED]

**CORRESPONDENCE AGENDA**

The following matters are being presented to the Board for information. These items require no action or are not ready for Board consideration. The Clerk of the Board may refer these matters to the County Departments and Agencies for acknowledgement, investigation and report back, direct action or response as appropriate. Report back to the Board may appear on Agenda for action by the Board of Supervisors or for informational purposes upon dates indicated below as appropriate.

**COMMUNICATIONS RECEIVED AND FILED BY THE CLERK OF THE BOARD ON BEHALF OF THE BOARD OF SUPERVISORS, WITH COPIES FURNISHED AS INDICATED.**

1. Letter from the State of California – Department of Justice regarding the merger of Ojai Valley Community Hospital and Community Memorial Hospital of San Buenaventura.  
**HEALTH CARE AGENCY**
  
2. Letter from Faye Hanna, Donna Chessani and family expressing their appreciation for the Board of Supervisor's adjourning in memory of Charles W. Hanna.
  
3. Letter from Teresa Jordan regarding the Ventura County Multi-Jurisdictional Hazard Mitigation Plan.  
**PUBLIC WORKS AGENCY**
  
4. Letter from Carroll Dean Williams, regarding Ventura County Public Defender, Case No. 2004049400, Denial of Constitutional Rights Guaranteed.  
**PUBLIC DEFENDER**
  
5. Letter from Carroll Dean Williams, regarding a false arrest by a Ventura County Sheriff Deputy on December 8, 2004.  
**SHERIFF'S DEPARTMENT**
  
6. Letter from Teresa Jordan regarding the County Watershed Protection District Draft Flood Mitigation Plan.  
**PUBLIC WORKS AGENCY**

**ALL OF THE ABOVE ITEMS HAVE BEEN FURNISHED TO  
EACH MEMBER OF THE BOARD OF SUPERVISORS**

Attn: Clerk of  
the Board,  
This is for the  
March 1, 2005  
Board meeting.  
TJ



**TERESA JORDAN  
3152 SHAD COURT  
SIMI VALLEY, CA 93063  
TELEPHONE NO. (805) 522-5016**

**TO:** Ventura County Board of Supervisors  
Hall of Administration  
800 S. Victoria Avenue  
Ventura, CA 93009

**FAX NO.:** 677-8711

**DATE:** February 17, 2005

**NO. OF PAGES:** 27 (includes cover sheet)

**RE:** County's Draft Multi-Jurisdictional  
Hazard Mitigation Plan.

3152 Shad Court  
Simi Valley, CA 93063  
January 26, 2005

URS Corporation  
Attn: Anna Davis  
1333 Broadway Street  
Suite 800  
Oakland, CA 94612

Re: Ventura County Multi-Jurisdictional Hazard  
Mitigation Plan.

Dear Ms. Davis:

Though the aforementioned document is superbly done, I am nonetheless opposed to the regional plan effort for the following reasons.

- #1 - The participating seven cities and county unincorporated areas did not provide a public input avenue to their respective citizens in the form of a survey as was done by the Cities of Moorpark, Simi Valley, and Thousand Oaks.

As much as information on cities and county Websites have described the DMA 2000 process there is not a lot of understanding by the public about emergency management, and hazard mitigation.

Page 4-58(?), *Earthquake*, first paragraph, last Sentence, states "In particular, over 75 percent of the planning area's emergency and government facilities, hospitals, ports, potable water, and waste water facilities, railroad stations, and schools are at risk to this hazard."

Page 2-3, second paragraph, second sentence, After the third bullet point, states "Adoption legitimizes the Plan..."

- #2 - Unlike the Cities of Moorpark, Simi Valley, and Thousand Oaks, the citizens of the participating

seven cities and county unincorporated areas did not have a public workshop input avenue.

Page 2-3, under **Achieve Regulatory Compliance**, it is stated "The local mitigation planning requirements encourage...local residents...to participate in the mitigation planning and implementation process. This broad public participation enables the development of mitigation actions that are supported by these various stakeholders and that reflect the needs of the community."

Page 4-58(?) states "Thirty critical facilities are located within this area, and almost half of those facilities are located within Fillmore city limits. The cost to replace these facilities is estimated to be \$179 million" relative to earthquake.

- #3 - The Draft Plan is incomplete.
- #4 - The Draft Plan mentions the unincorporated areas of the County, but these communities are not listed, nor discussed in the text. Each one is unique.
- #5 - Appendix B is titled **Public Meetings and Outreach Effort** on Page xi, but on Page B-1 Appendix B is labeled **Public Meetings and Notices**. The IACG meetings were not open to the public. The meetings' agendas state "This meeting is open to emergency services coordinators representing Cities, Special Districts and the Military."
- #6 - Not all "interested parties"(Page 3-2) were contacted. Even though I wrote to Sheriff Bob Brooks, I had to learn from the County's Website about the County's DMA 2000 process.
- #7 - The Plan was not provided in a language other than English, specifically Spanish, even though the County has a sizable Hispanic/Latino population, and in any emergency a language barrier can hamper emergency rescue or recovery efforts. English only version does not fulfill the planning effort to educate, nor does it help

the public understand the processes, systems or government function.

- #8 - State DWR Awareness Maps were relied upon. My comments on this issue are included in my January 20, 2005 letter to the Flood Mitigation Plan Coordinator/Ventura County Watershed Protection District Coordinator, and accompanying report dated January 21, 2005.
- #9 - The FEMA/County/Nolte FIS did not include the entire City of Simi Valley; only goes up to the City's westernmost boundary. Comments on this issue are included in the aforementioned letter & report to the Flood Mitigation Plan Coordinator.
- #10. The Disaster History under Section Four does not include text information after 1983, even though flooding events are listed on Table 4-4. This issue is commented on in my January 20, 2005 letter on the Ventura County Watershed Protection District's draft Flood Mitigation Plan.

#### ADDITIONS

- #1 - First Table of Contents page label "i".
- #2 - Second Table of Contents page label "ii".
- #3 - Third Table of Contents page label "iii".
- #4 - Fourth Table of Contents page label "iv".
- #5 - Fifth Table of Contents page label "v".
- #6 - Pages AK-1 and AK-2, include the names of all December 2003 to December 2004 IACG Meetings' attendees in the Acknowledgements section (Pages AK -1 and AK-2). Page 3-4, first sentence, first paragraph, states "In addition to the LHMPG, other interested parties were invited to attend and participate in the IACG monthly meetings." Page 3-2, Planning Committees(3.2) states "Monthly and quarterly meeting dates were set for all members of the committees and interested parties to attend."

- #7 - Pages AK-1 and AK-2, include the names of all of the Disaster Council members in the Acknowledgements section. (Pages AK-1 and AK-2)
- #8 - Page 3-3, Table 3-1, add Sherri Dugdale under Ventura County WPD with Mr. Vargas as was done for the Ventura County Superintendent of Schools --the name is listed on AK-1.
- #9 - Page 2-4, include the names of the county's unincorporated communities: Bell Canyon, Casitas Springs, Meiners Oaks, Mira Monte, Oak View, El Rio, Del Norte, Nyeland Acres, Hollywood Beach, Silver Strand, La Conchita, Lake Sherwood, Lockwood Valley, Montalvo, Newbury Park, Oak Park, Piru, Saticoy, Santa Susana Knolls, and the islands adjacent to the City of Simi Valley, as well as Rocketdyne (Santa Susana Field Laboratory) with their respective supervisorial district under Section 2.4.1 County of Ventura (Community Description).
- #10 - Section Two, include a map illustrating the locations of the County's unincorporated communities.
- #11 - Page 3-5, under Media Announcements include that the "draft Plan was posted for public comments during the" months of October, November and December 2004, and through January 2005; unless meant to state that there were 2 drafts--October and November (revision)--posted for those two months in 2004. In which case, then add a statement about the November 2004 draft Plan's availability on the County's Website through January 2005.
- #12 - Include a Board of Supervisors District map(?).
- #13 - Include a map depicting the special districts.
- #14 - Separate "Outreach Effort" from "Public Meetings" (Appendix B).
- #15 - Add the Ojai Sanitation District to Table 3-1, Page 3-3.

- #16 - Include the December 2004 Disaster Council meeting.
- #17 - Page 4-10(?), Table 4-2, under **Reason for Exclusion** include the recent sighting of a Tornado in the Ventura County area relative to the January 2005 rainfall event.
- #18 - Add a "Table" for the Ventura River Peak Flows Leading to Flooding in Ventura County(Page 4-20).
- #19 - Add a "Table" for the Calleguas Creek Peak Flows Leading to Flooding in Ventura County(Page 4-20).
- #20 - Add the word "Dam" to Las Llajas(Page 4-24; 2-3).
- #21 - Add the 2005, January of, La Conchita landslide event on Page 4-39(?).
- #22 - Pages 5-1 to 5-330, add at the top, bottom or side of pages with each community/jurisdiction first page the name of the name for quicker access. This will be helpful to the various jurisdictions citizenry for quick reference, instead of leafing through the entire section.
- #23 - Add Appendix C and label it "Plan Adoption Resolutions". Make the appropriate change to Page 1-1 statement "...signatures of Executive Orders, which are shown on Appendix A."

#### CHANGES

- #1 - Label Appendix A "Public Meetings"(Page xi).
- #2 - Label Appendix B "Outreach Effort"(Page xi).
- #3 - Delete "Public" from **Public Meetings**. Page 3-2 states **Meetings** and **Public Participation**. Page 3-4 states **Public Involvement** and **Meetings** instead of **Public Meetings**.
- #4 - List the schools/districts separate from the other special districts(Pages 2-8 to 2-13, and 5-115 to 5-330) as was done for the seven participating incorporated cities(Pages 2-6

& 2-7, and 5-6 to 5-114); not alphabetically. Include the Superintendent of Schools, but at the end of the list.

- #5 - List the Fire Protection District separately.
- #6 - List the water districts separately.
- #7 - List the sanitation district separately.
- #8 - List the Watershed Protection District separately.
- #9 - The County's Website for "Special Districts" section still lists the Ventura County Flood Control District instead of Ventura County Watershed Protection District.
- #10 - The page numbering order of Section Four is off. The Section begins with Page 4-7 instead of 4-1! Also correct the page numbering sequence for Section Four in the Table Of Contents section!
- #11 - Page 4-28(?), last paragraph, last sentence, states "Table 4-8 lists the debris and detention based owned by the county"; change to basins.

#### QUESTIONS

1. Why were all of the dependent special districts not included in the Plan?
2. Why were all of the independent special districts not included in the Plan?
3. Will the public have the opportunity to review the Regional plan effort--combined information from the Cities of Moorpark, Simi Valley, and Thousand Oaks?
4. Will the Final Plan have the Ventura County Board of Supervisors adoption date, or November 2004?
5. Did the "Media Release" from the Ventura County Sheriff's Office to the press have the information for "County Launches Disaster Mitigation Planning

Effort" with "Date: Thursday 25, 2004", or is this an error on the County's Website?

6. The County Website "Outline" referred to the City of Ojai as "El Ojai". Since the November Draft Plan refers to the City as "Ojai", which is the legal name?
7. The City of Ventura is also referred to as San Buenaventura. Which is the legal name?
8. Why were park and recreational districts not included in the regional planning process?
9. Why does the plan refer to "human-made hazards" and not "man-made" (Page 2-2, **Enhance Public Awareness and Understanding**)?
10. Why does the Plan state "**Enhance Local Policies for Hazard Mitigation Capability**" instead of ensure? (Page 2-3)
11. Why are special districts referred to as "communities" (Pages 2-3, and 2-8)?
12. Why does the time span for **Meetings** on Page 3-2 (January 2004-November 2004) differ from the timeline given in the Ventura County Watershed Protection District's Flood Mitigation Plan?
13. Why is the timeline for **Meetings** given as January 2004-November 2004 when it is stated on Page 3-2 (**Planning Committees**), section 3.2, "The County OES started the planning process in mid-2003 by using two existing emergency/hazard management groups: the IACG and the Disaster Council"?
14. Were any of the risk assessments "double-counted"? If so, which ones?
15. Did the County and the other 33 jurisdictions get a time extension from FEMA or CA OES to have the Plan adopted by the Board of Supervisors after the November 1, 2004 deadline?
16. While the County has a Fire Protection District Ordinance, does it, the incorporated cities, and

- special districts have a fire prevention ordinance similar to a flood prevention ordinance?
17. Why were the earthquakes listed on Page 4-14(?) not listed in order of date, instead of magnitude?
  18. Why does the statement "The largest and most damaging recorded natural floods in the Santa Clara and Ventura watersheds..." state "natural"?
  19. Why are there no levees in the Arroyo Simi in the Simi Valley part of the Calleguas Creek Watershed area? Have none of the improvements to the Arroyo Simi in that area since 1995 included levees (FEMA CLOMR)? (Page 4-22(?))
  20. Why has FEMA "not prepared flood hazard data for Federal lands" (Page 4-22(?))?
  21. Why does the Capacity column of Table 4-5 state "level capacity" for some of the dams, and "flood storage" for others? Are they not the same? If no difference, then label "flood storage".
  22. How can the Stewart Canyon Dam have a Level Capacity of 64.6 acre-feet, and a Max Debris Capacity of 203.5 acre-feet?
  23. Why does the Runkle Canyon Dam "Capacity" column state "NA" for "Max Debris Capacity" (Page 4-24)?
  24. Why do Lang Creek Debris and Detention Basins not have a "Max Debris Capacity" listed (Page 4-24)?
  25. Why does Matilija Dam not have a "Max Debris Capacity" listed on the Capacity column (Page 4-24)?
  26. Where are "Non-State-Size Dams and Basins" Tapo Hills No. 1 and No. 2 located (Page 4-26)?
  27. Why does the Sycamore Dam not have "the design capacity available at this time" since it "could overtop during an extreme storm event and cause flooding in downstream areas" (Page 4-27)?
  28. Are the staff/personnel resources on Page 5-310 correct for the County Superintendent of Schools

section--Page 5-302, County Fire Protection District, under staff/personnel resources has Mr. Charles Weis the Superintendent of Schools and other staff members listed?

#### CLARIFICATIONS

1. Page 2-8, under **Special Districts**, it is stated "These districts overlap with the unincorporated county, the seven incorporated jurisdictions, and in some cases with each other. This overlap makes it difficult to analyze the detailed risk assessment results for the special districts separately from the results for the county and incorporated jurisdictions. Doing so would result in double-counting of facilities in the tables. Note, however, that the results for each community, including the special districts, are shown in summary form in Section 5."
2. Page 2-3, third bullet point (**Achieve Regulatory Compliance**) states "to qualify for the Pre-Disaster Mitigation (PDM) program, local jurisdictions must have an approved mitigation plan to receive a project grant. Local jurisdictions must have approved plans by November 1, 2004, to be eligible for HMGP funding for Presidentially declared disasters after this date. Plans approved at any time after November 1, 2004, will make communities eligible to receive PDM and HMGP project grants."

Ms. Davis, for the Wildfire, Post-fire debris flows, and dams part of the Regional Plan, I am referencing my comments made in my January 20, 2005 letter to the Flood Mitigation Plan Coordinator on the Ventura County Watershed Protection District's Flood Mitigation Plan.

Ms. Davis, for Earthquake, and Geologic Hazards, I am Enclosing copies of my January 7, 1997 (3 Pages) and January 10, 1997 (10 Pages) letters to Mr. Chuck Real, Supervising Geologist of the State of California Division of Mines & Geology. They were not included with my report on the Flood Mitigation Plan. They were included with my August 13, 2004 report to Mr. Henry Renteria (OES Director) in response to the State's DMA 2K effort.

Ms. Davis, when the DMA 2000 information from the Cities of Moorpark, Simi Valley, and Thousand Oaks' Multi-Hazard Mitigation Plans (Hazard Mitigation Plans) are compiled(?) with the "Regional Plan" effort, their public participation processes must be detailed--notices, surveys, workshops, meetings, and the availability of the draft document before the item was agendized for their respective City Councils.

According to City of Moorpark staff, the City was not releasing the draft document until the item is agendized for the City Council. The City's public input deadline was extended.

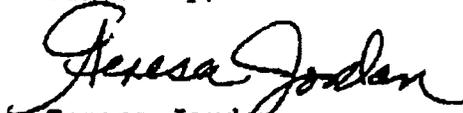
The City of Thousand Oaks made the draft document available before the item was agendized for the City Council meeting.

The City of Simi Valley had an extensive process which is outlined in my letter to Mr. Henry Renteria, CA OES Director, that is included in my January 21, 2005 Response to Ventura County Watershed Protection District's Flood Mitigation Plan bound report submitted to the District on January 26, 2005 (by way of UPS), and noted in my January 20, 2005 letter on the Flood Mitigation Plan that was faxed to the District on January 21, 2005--of which a copy was also faxed to URS, and the State of California Governor's Office of Emergency Services (OES) on January 21, 2005.

Ms. Davis, I apologize for any spelling and format errors. I have put my best effort forward to get this letter to you.

Ms. Davis, I would really appreciate written answers to my letter.

Sincerely,

  
Teresa Jordan

Enclosures:

January 19, 2005, County website changes by  
Teresa Jordan.

January 19, 2005, IACF Meetings' Attendees  
Changes. (2 pages) By Teresa Jordan

VENTURA COUNTY MULTI-HAZARD MITIGATION PLAN  
ACKNOWLEDGEMENTS (Pages AK-1 & AK-2) Changes\*

Additional Names of 2004 IACG Meetings' Attendees:

Rebecca Arnold, GSA  
Mark Bell, Sheriff's  
Hugh Bosma, RACES  
Monica Buckhout, Red Cross/TO DART  
Norma Camacho, Public Health  
Steve Caplan, Red Cross  
Dale Carnathan, Sheriff's OES  
Steve Carroll, VC EMS  
Linda Case, TO DART  
Kim Chudoba, City of Moorpark  
John Correa, Ojai Sanitation District  
Cathie Currie, State OES  
Royce Davis, Fillmore Fire  
Susan Duenas, Sheriff's OES  
Mitch Evans, ISD,  
Julie Frey, Public Health  
Bill Gallaher, Oxnard Fire  
Jerry Goldman, RACES  
Dr. Arpana Gupta, VC Public Health  
Sgt. Stan Hibdon, Sheriff's Dept. T.O.  
Mark Horwitz, TO DART  
Jackie Hull, Sheriff's OES  
Dan Jordan, Public Health  
Fiona Kilner, TO DART  
Eugene Kostiuhenko, Sheriff's OES  
David Laak, Vta. Co. WPD  
Alan Langville, VC Library  
Scott Leese, Bell Canyon DART  
Wayne Lewis, City of Ventura  
Ken Maffei, County Fire  
G. Scott Miller, Vta. Port District  
Wendy Milligan, Terra Firma Enterprises  
Rafael (Ralph) Nieves, NBVC  
Pamela Nishimoto, Sheriff's OES  
Ivan Rodriguez, Sheriff's OES  
Matt Rosenberg, Red Cross  
Bruce Smith, Vta. Co. RMA  
Barbara Sparktes-Wilson, Public Health  
Diane Starzak, Oak Park CERT  
Lana Tickner, Bell Canyon DART  
Graham Watts, City of Thousand Oaks

The names can be grouped alphabetically with those already listed, or listed by agency, or under a separate heading of "Parties of Interest".

Also, list the names of those members of the Disaster Council--in attendance at the March 4, 2004, July 15, 2004, September 9, 2004, and December 2, 2004 meetings--who are not on my list, or the list in the Plan(Pages AK 1 and 2).

### QUESTIONS

Local Hazard Mitigation Planning Group Section(Page AK-1)

1. Carl Ingis, or Inglis?
2. Matthew Winegar, or Winegan?
3. Why did Tammy McCracken represent all of the school districts listed next to her name?

Was each school district unable to designate a staff person?

Could they not spare just one staff member?

Did they feel they did not have the expertise to undertake the Plan?

How well versed is Ms. McCracken with regards to each school district?

Which school district does Ms. McCracken work in?

1. Why were the names of the Disaster Council Appointments(Page 3-4) not listed?

\*Compiled January 19, 2005 by: Teresa Jordan--resident of the City of Simi Valley.

VENTURA COUNTY MULTI-JURISDICTIONAL HAZARD MITIGATION PLAN  
(Regional Plan)

Changes\*

COUNTY'S "WEBSITE" INFORMATION SECTION:

- Draft Multi-Jurisdictional Hazard Mitigation "(full version, \_\_\_\_\_ MB)"
- "Or - you may download individual sections:"
- "Section I:" Table of Contents, List of Tables, Figures, and Appendices, List of Acronyms, Acknowledgements, and Prerequisites.
- "Section II:" Background
- "Section III:" Planning Process
- "Section IV:" Risk Assessment
- "Section V:" Mitigation Strategy
- "Section VI:" Plan Maintenance
- "Section VII:" References
- "Appendix A:" Public Meetings
- "Appendix B:" Outreach Efforts
- "Appendix C:" Plan Adoption Resolutions

\*Compiled January 19, 2005 by: Teresa Jordan--resident of the City of Simi Valley.

3152 Shad Court  
Simi Valley, CA 93063  
January 7, 1997

Mr. Chuck Real, Supervising Geologist  
Division of Mines & Geology  
801 K Street, MS 12-31  
Sacramento, CA 95814

Re: Public Review and Comment Period, October 8, 1996-January 7,  
1997 on the Seismic Hazard Zones Maps; City of Simi Valley  
(West and East).

Dear Sir:

When the Seismic Hazard Zones Maps were released to the public for review and comment, I was very elated and relieved. I thought that finally we, here in Simi Valley, would finally have something to finally sink our teeth in relative to backing up our claims that there have been in existence hazards with respect to liquefaction, landslides, faults, etc. Unfortunately, that has not been the case after a much closer look. Soon my enthusiasm turned to despair. But, not being one to give up easily, I gave this whole matter a more indepth review. Because I am not an expert but asconcerned citizen I always feel inadequate to undertake issues involving technical or scientific guidelines, information, or any type of documented material of such specifics. This is when I then turn to much research and investigation. Though time consuming this avenue serves me well in figuring out another way to address technical and scientific matters. This is the path undertaken with the comments, observations, recommendations and questions that follow. I hope it does not inconvenience you or your staff, but simplicity is the only way that I can make sense of technical and scientific information.

With regards to the Simi Valley (East) Seismic Hazard Zones Map, I was shocked but not surprized to see that thought it is dated September 19, 1996 it is still the Base Map prepared by the U.S. Geological Survey, 1951, photorevised 1969.

Mr. Real, this is unacceptable. Any updated study, guidelines, data, information, photographs, maps, diagrams, graphs, etc. should have present day materials in order to be accurate and thus complete. I firmly believe in the importance of having past history, surveys, data, pictures, maps, etc. included in anything that is updated. This after all is how present day generations can learn from the mistakes of the past in order to avoid circumstances that lead to catastrophies, and hopefully survive such disasters with a zero or minimal loss of life. Therefore, safety in anything we do should be the primary and highest goal. I personally feel that the newly released Seismic

Page 2

Hazard Zones Maps for the West and East part of my City, Simi Valley do not accomplish that goal as the unrevised maps stand.

It was after much thought, and after getting through my disappointment over the lack of present maps and photographs, that I finally contacted the Division of Mines & Geology in the Los Angeles area and learned about the Guidelines. It was then that I put in a call to my City, to Mr. Mike Kuhn whom I was told was in charge of the Seismic Hazards Zones Maps matter. I requested a copy of those guidelines and paid for it to save myself some time since I had less than a week to go over them and get this letter to you, as well as contact Mrs. Ginn Doose to let her know the contents of those Guidelines. Once again, I was very disappointed. But, this time around I was disappointed in myself for thinking that this new information had somehow touched on more specific information relative to my City's seismic hazardous areas. I was looking for more than the explanations and "Important-Please Note" discussions on the maps. But, all was not lost. I found the Guidelines very informative and useful, though I don't understand everything within the pages.

Mr. Real, I understand from Mrs. Ginn Doose that there will be a meeting held in your Division around January 16, 1997. I will try to touch base with as many concerns, comments, observations, etc. relative to those Guidelines as time permits since I have other matters to attend to and this letter must be faxed to you before the close of your business day, and mail the original letter with today's postmark. If it is not too much to ask, I will be forwarding the rest of in a follow up letter to you tomorrow.

As far as the matter of the City being the "Lead Agency" is concerned, what happens if the City is not in compliance with the Guidelines? Who oversees the "Lead Agency"? Does the Division of Mines and Geology have the enforcement power to prosecute, or does the City only get a warning, or slap on the hand? Guidelines, rules, regulations and laws on the books are great but not if they are not adhered to by those they are aimed at.

I felt that the section for "Definitions" did not go far enough. Perhaps that is due to the fact that I'm only a layperson, and not a government staff member, member of the scientific or technical community, or development community for that matter. But, since the public reviews and relies on what is being brought forth and eventually adopted there needs to be a broader base for these documents to cover for a clear and full understanding. I will include at least all of the additional words necessary in this section in the follow up letter. This way one doesn't have to refer to a dictionary to know what is going on because a home dictionary doesn't always go far enough, or is outdated, or the meaning one is looking for is not contained within the book at hand.

Page 3

Sir, the reason that these guidelines need to cover all basis and not just depend on basic standards to be followed is that all t's have to be crossed, all i's dotted, and watch all p's and q's and nothing should be left to chance. The catastrophic flooding that has swept our Nation and now our State speak volumes of why whether it is flooding, earthquakes, or any other natural disaster type situations should not be taken lightly. Here at home we have had major proposals for projects that have major impacts but whose severity are either being undermined or not addressed at all by our City in the Initial Studies, approved Specific Plans and EIRs', Annexation requests, etc. Just recently Mrs. Doose and I were involved in bringing forward information that was crucial to the Marr Ranch proposal that my City Council approved on December 16, 1996. That was the Las Llajas Dam and Las Llajas Creek. Imperative because the City has circumvented its own General Plan Final Safety Element Policy VIII-MM which states that the City should encourage the County and State to finish the delineation of the Las Llajas and Runkle Dams inundation area. Critical because back on January 23, 1996(?) my City Council approved giving staff the go-ahead to start the paperwork relative to deleting the Policy VIII-3.7 from that same General Plan Final Safety Element dealing with not allowing development within dam inundation areas. That General Plan Amendment(GPA) should be coming forward soon. Not only this, but the City's Revised Emergency Plan has not yet been put through the public review period and finalized.

I hope that you will not discount the information that I will put forward for your consideration in my follow up letter because it did not come to you in a timely manner. Thank you.

Sincerely,

*Mrs. Teresa Jordan*

Teresa Jordan  
(805)522-5016  
(805)527-1263

3152 Shad Court  
Simi Valley, CA 93063  
January 10, 1997

Mr. Chuck Real, Supervising Geologist  
Division of Mines & Geology  
801 K Street; MS 12-31  
Sacramento, CA 95814

Re: Seismic Hazard Zones Maps; City of Simi Valley (West and East),  
Division of Mines and Geology meeting week of January 15, 1997.

Dear Mr. Real:

Sorry for the delay in getting this follow-up letter to you as mentioned in my faxed January 7, 1997 letter on the deadline of the Public Review and Comment Period (October 8, 1996 to January 7, 1997).

As you will note, I still don't address items relative to technical/scientific procedures (methods, analysis and reports) because I am not well versed in either. But, I hope that that is not held against what I express in the following contents of this letter.

With regards to the Draft Guidelines for Evaluating and Mitigating Seismic Hazards document, in my January 7th faxed letter to you I mentioned the section for "Definitions". I should have clarified that point, since there are the "Definitions" on Page 8 under the "Introduction- Chapter 1, and then there are the "Definitions" mentioned on Page 67 under "Technical Terms and Definitions". When I wrote my January 7, 1997 letter to you, I was referring to the section on Page 8. Perhaps the more I read the technical sections of the Guidelines I might find that the section on Page 67 may need to be added onto as well, or maybe it is fine as it now stands.

It is unfortunate that the Guidelines did not include a copy of Chapter 7.8 of the Public Resources Code; California Code of Regulations, Title 14, Division 2, Chapter 8, Article 10; the Business and Professions Code; and any other state law or regulation that applies; or at least mention of where those documents could be reviewed should have been listed in the Guidelines. Relative to those "other state law or regulation", what would they be?

As far as the part "Areal Extent of Hazard" on Page 10 goes, I feel strongly that with regard to "Optimized computer-mapping technology" is concerned that the maps contained within any document used for any "project" should be past and present ones. Too often here in Simi Valley projects have come through with maps that are past history and yet present day mapping is what is important to the Environmental Impact Review process. Then, there

are instances where present day mapping is adhered to to prove the developers and lead agency's points but in such circumstances the historic(old) maps are crucial. This is why it is imperative that old and new maps be made available. I thought it interesting that though the Division of Mines and Geology is covering the Seismic Hazard Zones Maps for the West and East parts of Simi Valley the large map says "Calabasas" and not "Simi Valley". Could you please explain why this is so? What on earth does "Calabasas" have to do with Simi Valley?

I can't tell you how uneasy I was after reading the following, especially in light of the flooding events of the heavy rains of January 1997 in the northern part of California; "a worst-case scenario of a major earthquake during or shortly after a period of heavy rainfall is something that has not occurred in Northern California since 1906, and has not been witnessed in historic times in Southern California." That could just be an understatement in the long-run. After all, January 17, 1997 is fast approaching. And, if not then, possibly sooner, or later. (Page 10; Guidelines)

I fully agree with the statement in the "Off-site Origin of Hazard" section on Page 10; ". . . neither . . . Seismic Hazard Zone Maps, nor . . . any technical reports . . . , is sufficient to serve as a substitute for the required site-specific geologic and geo-technical reports called for in the Act."

Sir, a copy of the "Act" should have been included with the or in the Guidelines. I appreciated having the purpose listed but it is not the same as having a full disclosure of the "Act".

With regards to Page 11, section for "Relationship of these Guidelines to Local General Plans and Permitting Ordinances", I found it very weak to just state "Public Resources Code Section 2699 directs cities and counties to 'take into account the information provided in available seismic hazard maps' when it adopts or revises the safety element of the general plan and any land-use planning or permitting ordinances. . . . cities . . . should . . . consider the information . . . in these guidelines when adopting or revising these plans and ordinances." When my City Council heard the proposal for the Smith's Food and Drug Center at the southwest corner of the intersection of Sycamore Drive and Alamo Street three of the Council members opted to disregard completely policies within the City's General Plan Final Safety Element and Community Services Element in order to allow the approval of that development; a project which to me personally jeopardized the evacuation route of the only existing hospital in town should the major intersection near that "Critical Care Facility" be blocked or obstructed during a major fire(the hospital is near fire hazard areas) or major flood(the hospital is adjacent to a flood control channel that is unimproved just north of the hospital property line). There is no way in or out of the hospital area to the west or the north of its location; only east and that is through narrow roadways. During a major flood this access will be

flooded to the point of hampering evacuation and allowing providing of services because during a non 50-year flood such as we experienced in 1992 and 1993 the area of Reservoir and Alamo Street (the next closest major intersection) gets flooded. Then, just recently in December 1996, the City Council members once again (except this time in a vote of 4 to 1) disregarded the City's General Plan Final Safety Element with regards to policies dealing with dam inundation areas by not addressing approved guidelines. Policy VIII-3.7 in January 1996 was sent with Council direction and approval to staff for deletion some time soon. This will do away with a very important safeguard because development will take place without full environmental review within dam inundation areas, specifically the Marr Ranch and Kadota Fig Areas because my City has not followed through with another very crucial Safety Element policy; VIII-MM which states that the City should encourage the County and State to delineate the Las Lajas Dam inundation area. That policy was contained in the 1992 approved City's General Plan Final Safety Element; to date the City has not followed suit. Not only has the Las Lajas Dam inundation area not been delineated but neither has the Runkle Dam area. Then, just last year the City Council approved implementing what is called the "Vision 2020" Study Groups to give input and eventual approval by the City Council to guidelines that will take our City into the year 2020. While at first I thought it was a good idea to have something like this take place, I then realized that this is just one more way to get around doing a complete and thorough General Plan Update. Thus, continuing with the status quo of development within Simi Valley at the expense of the safety and welfare of the future and existing homeowners and businesses.

I am very concerned over the information in the Guidelines on Pages 15 and 16 under "Items to Consider in the Geotechnical Study." What is meant by "to the satisfaction of the lead agency's technical reviewer" (No. 4)? What is the scope of that "satisfaction"? I personally feel that this leaves the door open to weakening not strengthening investigations, findings and mitigation measures.

With regards to the three(3) points listed on Page 16 for Item No. 4 on Page 15, what does your Division mean by "sufficiently thorough (first point)?"

As far as the second point is concerned, "The findings regarding identified hazards are valid"; please explain or clarify. (As opposed to what?)

The third point refers to the "lead agency's" measure of "Acceptable Level of Risk". Is my City supposed to have a list or some form of written guidelines for the development community and the public to know what it defines as, or allows as "Acceptable Level of Risk?" What happens if the "lead agency" keeps critical documentation and/or information out of public reach because of its controversial and hazard potential, thus keeping everyone

or at least a large majority of the residents in the dark about such potential safety matters?

Chapter 3 on Page 17 under "Screening Investigation" mentions the review of existing "topographic maps". Are these supposed to be old and new (present day) topographical maps, or just one or the other? The same question goes for the point dealing with "geologic maps and reports". I ask the same about the "aerial photographs" and the "water well logs". The "agricultural soil survey reports" should also be old and new documentation. Please clarify or give examples or complete list for what is considered under "other published and unpublished literature"? Since aerial photographs are mentioned, what about including video tapes of overhead or aerial surveys, as well? Such was the situation for the illegal grading of the Big Sky/Whiteface project. We were told, that is Mrs. Ginn Doose and myself, were told that there were 3 different video tapes taken of the site from the air (sky) which served for the Ventura County District Attorney's Office to use in its prosecution and eventual court final judgement on the illegal activity by the land owner. With regards to the "water well logs, what happens if these are not available at the time that the Tentative Maps and Planned Development Permits, Zone Changes, Environmental Reports, Specific Plans and Annexations are improved by the "lead agency" before a grading permit is issued?

Please clarify the following section on Page 18 after the fourth point on top of that page; "Localities that offer the best opportunities for confirming or extending the information developed are selected for field verification. A field reconnaissance of the area is performed to verify the information developed in the earlier steps, to fill in information in questionable areas, and to observe the surface features and details that could not be determined from other data sources." Is that "field reconnaissance" done by terrain vehicle or airplane? What are "those localities that offer the best opportunities for confirming or extending the information"? Are they anything like "repositories", such as the Simi Valley Public Library is the repository for the Rocketdyne Santa Susana Field Laboratory documentation? What constitutes the "earlier steps, to fill in information"? What are "questionable areas"? How can "surface features and details" "not be determined from other data sources"? And, what are those "other data sources"?

The "Definitions" section should have included the geomorphic features listed in the afore mentioned paragraph. While I have come across most of the conditions named, I am not familiar with "grabens". Please, don't forget that this document was put out for public review and comment. I am not a scientist or technically minded student or employee. I for one feel that for the general public pictures of these geomorphic features should have been included in the Guidelines. Definitions and mention of such things is great but there is nothing like the saying that "A picture is worth a thousand words"!

I fully agree with the following under "Quantitative Evaluation of Hazard Potential - Detailed Field Investigations/General Information Needs" on Page 18: "The work should be based upon a detailed, accurate topographic base map prepared by a registered civil engineer or land surveyor. The map should be of suitable scale, and should cover the area to be developed as part of the project, as well as adjacent areas which affect or may be affected by the project". Built, what do you mean by "suitable scale"?

I'm not in agreement with the following: "In the case of projects where the property simply is to be subdivided and sold to others undeveloped, the goal is to assure that each parcel contains at least one buildable site that meets or can meet the previously defined acceptable level of risk". For starters, what if the parcel(s) can't be built on, yet things are done so that it can be built on in hill and canyon areas? Then, there is the matters of the "previously defined acceptable level of risk"; what if that acceptable level of risk in the past doesn't meet present day definition because there are more factors that enter into the picture because of present day needs for more stringent building and safety codes that would be obsolete in the past; along with grading, as well as landslide mitigation methods of retaining and other types of walls? Once again, is a City supposed to have such "Acceptable level of risk" listed somewhere for the public to see? And, if this is so, wouldn't those regulations or at least the definition have to be updated? Is this what would be contained in a City's "Emergency Plan"? If that is the case, my City's Emergency Plan is just now being revised. It will soon be passed out to the various City departments for consideration and comment, and possibly go before the City Council in February or March. This is yet another extensive document that the public will not have much time to review and comment on before it is approved.

On Page 19, under the section "Content of Reports", please explain "merit approval". (First paragraph.)

Same page, section and paragraph, please what is meant by "adequately documented"?

Same as above, what is meant by "sufficiently complete"? How does this differ from "sufficiently thorough" on Page 16? Perhaps these type of things could also be included in the definitions section.

The same comments apply to such items as "complete screening investigation report", "quantitative evaluation report", "topographic relief", and "lithologic contacts".

It is unfortunate that "No attempt is made to define the limits of what constitutes a complete screening investigation report versus a quantitative evaluation report", and instead the public

Page 6

will have to rely on the "lead agency" requirements along with site-specific conditions and circumstances to dictate which items contained within Pages 19 and 20, and perhaps others as well will be followed. Surely, there are some common threads that run true to all cases. And, even if there are no common threads you could take a worst case scenario and set site-specific conditions and circumstances to be used as a yard stick for normal and abnormal cases. Or, at least give us the State requirements to go by, and/or federal government requirements, apart from those listed in these pages. I would hate to see something along the lines of what is occurring with the breaking of the levies up north take place in Southern California, most especially my City, with development's allowed in areas of questionable nature just because an attempt was not made to define the limits of what constitutes a complete screening investigation report. Just like a family is supposed to have an emergency or evacuation plan in case of fire in a home, so should the State and/or federal government have such a tight and solid plan to work from and if not a solid plan, then a couple of alternatives.

Sir, as I had mentioned previously in my January 7, 1997 letter to you I was disappointed to see that the Guidelines were not more oriented toward the City or area that the Seismic Hazard Zone Maps were put out for. Included in such report should have been the City's "Acceptable Level of Risk" requirements list. Once again the public isn't even aware that there is a City Emergency Plan. If this new revision of the 1986 Simi Valley Emergency Plan, Emergency Operations Center Procedures Manual and other land use related issues are not completely and thoroughly addressed this time around the State and Federal Government are the ones along with the homeowners who will end up picking up the tab for decisions that were left up to local governing bodies who have preferred to approve projects left and right knowing all too well the dangers allowed because they did not adhere to established State and Federal requirements, with regards to the floodplain management, and are allowing intrusion into the hill-sides even though we have a Hillside Performance Standards Ordinance but excuses have been found time and again to allow the proposals to proceed. Then, there have been instances where the critical information, once again as an example the City's F.E.M.A. Flood Insurance Study(F.I.S.), was not in the files for the public to review in order to address scientific and technical issues. I for one don't want that to happen with matters dealing with seismic hazards, because you see back when my City's Council undertook the budget in 1994 a small item was approved by it. That little known subject dealt with allowing the destruction of City records. I tried but failed to stop that approval because no records at any time should be destroyed. Not only are they crucial to a City's history, but so are they critical to knowing the past history of a given project, property, cumulative impacts, as well as what was or was not studied, investigated, and reported.

Though City personnel have assured me since then that no such action has been undertaken by the City relative to destroying records, I for one don't believe it. It has been very hard in some proposals before either my City Council or Planning Commission to undertake research because the excuse has been for over a decade that the relevant material is stored in a black widow infested shed. Though it has been challenging, I've been able to recreate the information necessary to base an opinion pro or con, though mostly against because after putting the pieces of the puzzle together I find that what the developer presented and staff agreed with should not be heard or approved by the local governing bodies because they needed further studies. It is from this standpoint that I have addressed this Guidelines.

With respect to Page 20, No. 2, "Shear strength plots, including identification of sample tested, whether the points reflect peak or residual values and moisture condition at time of testing", why can't those "plots" include both "reflect peak" and "residual values"? Is this testing affected by the season or time of year when it is undertaken, since mention "moisture condition at the time of testing"? If such is the case what would be the appropriate time of the year to undertake the testing? I just remember the fact that earlier on Page 10 where it is stated that "a worst-case scenario of a major earthquake during or shortly after a period of heavy rainfall is something that has not occurred in Northern California since 1906, and has not been witnessed in historic times in Southern California." So, it appears that moisture has a direct impact on such testing.

Same Page, No. 3 and No. 4, the "or" should be "and". This would make for a more thorough report.

No. 5, please explain. I have no idea of how a slope stability analyses of critical (least-stable) cross-sections are undertaken with regards to studying or testing the stability of slopes.

No. 6, please clarify. What are those "factors of safety"? Are these like the "acceptable levels of risk"? Or, are these related to having testing crews take precautions when undertaking these test procedures and specimens?

I fully agree with the statement under No. 1 with regards to reports that address liquefaction hazards: "If Standard Penetration Tests (SPT) are performed, a full description of all important equipment and procedural details." But, how do we the public assure that this is what is used? Shouldn't there be a checklist followed with a signature to guarantee its authenticity? What if other types of tests other than SPT are used?

Please give examples for Numbers 1 through 6 as is done for No. 7 on Page 20 and 21.

Page 8

Since Chapter 5: Analysis and Mitigation of Earthquake-Induced Landslide Hazards mentions that "Many geologic formations in California, . . . are highly susceptible to landsliding. These rock units, such as the Orinda formation in the San Francisco Bay area or the Modelo Formation in the Los Angeles basin are generally well known among local engineering geologists. For some areas, susceptible formations have also been noted on the Landslide Hazards Identification Maps published by the Division of Mines and Geology.", the Guidelines should have contained a photograph and map of that San Francisco Bay area and Modelo (Los Angeles basin) Formations. Also, I gather that the "Landslide Hazards Identification Maps" published by your Division are different from the "Seismic Hazard Zone Maps". Those too should have been included for study and comparison purposes by the public. (Page 27.)

Mr. Real, before the Division of Mines and Geology approves or finalizes these Seismic Hazard Zone Maps, will the public get an opportunity to address any correspondence, input and concerns from other public members, and government agencies, as well as address for one final time your conclusions or findings? If such is the case, do I need to contact anyone in your Division to get a copy of such findings before these maps and guidelines are approved? I don't mind paying for the copies.

Sir, as far as Page 33 goes, I am a bit concerned over the use of the Corps of Engineers adopted practice of using 80% of the undrained strength when testing for the soils stress conditions because I feel that it leaves the door open for developers and "lead agencies" to go opt for this method verses going with a more rigorous total stress analysis.

Page 34, what is that "professional judgement" supposed to be that is alluded to in the paragraph following "General Recommendations"? I ask because a lot depends upon his/her judgement for the "determination of static and dynamic slope stability (i.e., Factors of Safety), and the acceptable parameters used in the analysis" which are supposed to follow the standards devined by the lead agency. What are those "Factors of Safety"? Are these like the "acceptable levels of risk"? These "factors of safety" were also mentioned way back on Page 20.

Please clarify or explain when, how, when, and why "no standards exist", since the general values given will be allowed for defining the stability of slopes for static and dynamic loads.

Page 37, words or phrases such as "Screen out", "potentially liquefiable soil" and "young deposits" should be included in the Definitions section for the public and homeowners/propertyowners to understand. As far as "screenout" is concerned, does this mean not to study further, to study further, or to delete altogether?

Page 9

Page 38, what is the difference between "potentially liquefiable soils" and "potentially liquefiable deposits"? This is another word or phrase that should go into the Definitions.

I am a bit leary if the geometry of potentially liquefiable deposits significant risk is left to the possibility of mitigation by "relatively inexpensive foundation strengthening" determination rather than to "requiring further investigation". I personally feel that 9 times out of 10 developers and "lead agencies" will opt for the mitigation rather than the investigation route.

Same Page, last paragraph. There is need for further clarification since it states "Even when it is not possible to demonstrate the absence of potentially liquefiable soils or prove that such soils are not and will not become saturated, it may be possible to demonstrate that any potential liquefaction hazard can be reasonably investigated through a simple strengthening of the foundation of the structure, as described in the mitigation section of this Chapter, or other appropriate methods." For one, does this mean that the Division of Mines and Geology is recommending that foundations should be strengthened no matter what the situation? What are those "other appropriate methods"? Are they supposed to be different than what is already discussed in the Guidelines? Or, does it refer to other areas in the Guidelines besides the "mitigation section of this Chapter"?

Page 39, "Methods which would satisfy the requirements of a screening evaluation, at least in some situations", why not in all situations? What are those situations that would preclude this?

Page 40, words and phrases of "Liquefaction Resistance", "sandy" and "silty soils" should be included in the Definitions section.

Page 41, thank you for the chart showing the "advantages" of the SPT and CPT methods. I agree with the statement "Either of these methods can suffice by itself for some site conditions, but there is also considerable advantage to using them jointly". What about including the "Disadvantages of each in a chart form as well?

Page 49, Chapter 7: Guidelines for Reviewing Geotechnical Reports/The Reviewer. Page 50 contains the section for "Conflict of Interest". I have agreed with everything that has been said about the qualifications and ethical make-up of the individual in the pages leading up to "conflict of interest". But, with regards to "conflict of interest" how do we, the public know whether or not the reviewer performed the geologic and/or engineering investigations, did or did not review his/her own report, or reviewed his/her own agency or company's report? Is there supposed to be something in writing to that effect? If such a thing takes place, does that reviewer have any State or Federal Agency to turn to to report such an infraction, and is the person protected somehow?

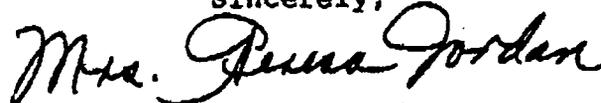
What if an outsider is privy to such a situation existing? Does that individual have anywhere to turn to other than to use the "Whistle Blower Act"? Or, is anyone left to their own defenses? Was there a reason that instead of saying the "lead agency/agencies" the Division of Mines & Geology opted to state the following on Page 49, first paragraph: "The purpose of this Chapter is to provide general guidance for engineering geologists and civil engineers who review reports of seismic hazard investigations on behalf of agencies that have approval authority over projects"?

Is there a reason why some of the materials listed under the References Cited section on Page 55 did not contain a date? They should have all been dated. Addresses should have also been given for where one could write to for the purpose of obtaining copies, and names of repositories should have been included for those who cannot purchase such materials.

Mr. Real, though it is unfortunate that "Appendix A": Guidelines for Preparing Engineering Geologic, Earthquake, and Fault Hazard Reports were not included with this Guidelines, but will instead be included with the Final Guidelines, it is then reason enough to say that the public should have one more go at input on the Guidelines before they are finalized for everyone to follow. (Page 69.)

Finally, please explain "Appendix C" on Page 73. Are these "Sources of Earthquake Strong Motion Records" only found through the use of a computer, or are they "repositories" for anyone to visit and research? What kind of "records" are they? Maps? Reports? Files? Graphs?

Sincerely,



Teresa Jordan  
(805)522-5016  
(805)527-1263 fax

P.S. Since I am less familiar with the Seismic Hazard Zone Map for the West end of Simi Valley, I have enclosed a copy of a newspaper article that I feel impacts that Map and that further study needs to take place. My City Council just last year around October to December approved a handful of projects below the Wood Ranch/Bard Reservoir location.

Enclosure:

July 13, 1996, Simi Valley Daily News Edition, "Quake Study performed on Simi dam/Water officials seek extensive follow-up to confirm stability".

Attn: Clerk of  
the Board,  
This is for the  
3/1/2005 Board  
meeting. mjj



TERESA JORDAN  
3152 SHAD COURT  
SIMI VALLEY, CA 93063  
TELEPHONE NO. (805) 522-5016

TO: Ventura County Board of Supervisors  
Hall of Administration  
800 S. Victoria Avenue  
Ventura, CA 93009

FAX NO.: 677-8711

DATE: February 17, 2005

NO. OF PAGES: 24 (includes cover sheet)

RE: County Watershed Protection District  
Draft Flood Mitigation Plan.

3152 Shad Court  
Simi Valley, CA 93063  
January 20, 2005

Flood Mitigation Plan Coordinator  
Vta. Co. Watershed Protection District  
Hall of Administration  
800 South Victoria Avenue  
Ventura, CA 93009-1600

Re: Draft Flood Mitigation Plan.

Dear Plan Coordinator:

I am opposed to the aforementioned document for the following reasons.

#1 - While the "planning process" provided "a high level of assurance that the mitigation actions proposed by the District and the priorities of implementation are valid" (Page 2-1, first paragraph, first sentence), the Plan is incomplete and erroneous.

Page A-6 IACG Minutes state under Agenda Item III "With the Regional Hazard Mitigation Plan that is being developed, the State may do a preliminary review of the plan. Therefore, everything must be documented."

#2 - Page 1-1, first paragraph, first sentence under Purpose of Plan mentions "Since 1992, there have been five Presidential disaster declarations for flooding in Ventura County."

Page 3-3, middle of page, states "The peak historic rainfall intensity recorded by Ventura County rain gauge, occurred on February 12, 1992."

There is no information in the Disaster History on Pages 3-3 and 3-4 for the 1992 rainfall and events of 1995, 1998, as well as two others.

#3 - Appendix A cover page is misleading--Public Meetings And Notices.

Page 2-2, Meetings, sentence states "During the planning process, members of the public were invited to attend and comment on the flood elements in the hazard mitigation plan at monthly IACG meetings and quarterly Disaster Council meetings."

Page 2-1, Public Involvement stipulates "(August 2004 - November 2004)". Page A-6, IACG Minutes state under Agenda Item III that the Disaster Council Meeting will be the "public venue" to "involve public input".

Pages A-1 to A-17, Public Meetings And Notices (Appendix A), includes the IACG meetings. The IACG meetings' agendas stipulate "This meeting is open to emergency services coordinators representing Cities, Special Districts and the Military."

#4 - Page 1-3, last paragraph, third from the bottom of page sentence states "In addition, the District and FEMA partner to conduct a FIS for the Calleguas Creek and other tributaries." The City of Simi Valley, with the exception of its westernmost boundary, was excluded from the current FEMA/County/Nolte flood insurance study, even though the County's unincorporated areas adjacent and surrounded by the City were not made part of the City's 1997 FIRMs and FIS. The City's FIS was rushed and done in piecemeal fashion.

Page 4-10, second to last sentence, of the paragraph before Ventura County Stormwater Quality Management Program section, states "Through the CTP Program, FEMA establishes partnerships with these entities to leverage resources, increase productivity, and engage partners in the mapping process, thereby increasing local 'ownership' of the products."

Already the County and the City of Simi Valley have a Cooperative Agreement in place for the

GIS information in which third parties, specifically the public, are left out in the cold. Some of the costs even to those who can sign up for the program pay expensive fees.

The City of Simi Valley's 1999 Update of its Safety Element no longer contained the flood maps as had been done with the 1988 update.

- #5 - Page 2-1, under **Meetings** mentions that they took place December 2003 - November 2004, but Appendix A (**Public Meetings And Notices**) includes agendas and minutes of IACG meetings beginning with April 2004, and there is only the September 2004 Agenda for the Disaster Council (Pages A-1 to A-17).
- #6 - Page 2-3, **Website**, a fax number was not provided for comments. Doesn't say can walk comments in to the District either. When the Plan appeared on the WPD's site the Plan was not available when clicked, even when October 18, 2004 came up it still was not available. Two months went by and the October 18, 2004 date still appeared even though District staff had informed me the Plan would be out by November. There was no update on the delay!!! The Regional Plan was, also unavailable when the area on the District's site was clicked in October 2004.

The District's and County's websites need to be more "user friendly". There must be a "printer friendly version" capability for all information.

- #7 - Pages 3-1 to 3-47, while there is a Table for the **Summary of Santa Clara River Peak Flows Leading to Flooding in Ventura County** (area 1,600 square miles)", no tables are provided for the other two watershed areas--**Ventura River** (area 226 square miles)", and **Calleguas Creek** (area 312 square miles)"; Page 3-5, **Location, Probability of Occurrence, and Magnitude**.
- #8 - Page 3-6, last paragraph, last sentence states "The FIRMS show 100-year floodplain boundaries for most flooding sources in the county, as well as for coastal areas." Late 2004, I became aware of the State's Awareness Floodplain Mapping

Program. I am against the use of "awareness maps" because they "approximate delineations for expected flooding and are considered as advisory floodplains, not regulatory floodplains". There are "20,000 miles to map within the next few years."

The Awareness Floodplain Mapping Program to me is just an excuse to squash the Governor's OES' Dam Inundation Mapping Program in existence for a number of decades. This work will now be done on an as needed basis. The expertise of the one staff member that handled this work has been lost. While it took OES a long time to get some of the dam inundation studies and maps approved, at least the work was being done.

The "Awareness Floodplain Mapping Program" article written by Mr. Tom Christensen, of the DWR, Floodplain Management Branch, also states. "Detailed flood insurance studies are expensive and, resultantly, are limited in coverage." What must be done is to have thorough studies so that nothing is left out especially when cumulative issues have to be addressed. It is unfortunate that the FEMA NFIP mapping Program "does not include all of the flood hazards areas currently subject to development. As a result, flood prone areas have seen and will continue to see unintentional losses from flooding because of insufficient information regarding potential stream flooding not identified."

The expense of studies is nothing compared to the insurmountable cost in loss of life, quality of life changes, and damage to property and infrastructure when a disaster, or catastrophe strikes, since now-a-days the astronomical costs are measured in hundreds of millions of dollars, or in the billion dollar range.

With all of the lip service that elected government representatives from the local to the federal level lend when disaster strikes, it is flabbergasting, mind boggling, and disturbing--it should also be criminal--that this is being done

instead of truly safeguarding the citizenry, and protecting private/public property and infrastructure from serious damage all for the sake of growth for the sake of the economy. The article states "It is estimated that about one-fourth of the State's 200,000 miles of stream systems will see some encroachment in the next 25 years."

Page 3-13, it is stated in the second sentence, third paragraph, under Location, Probability of Occurrence, and Magnitude "This map provides an Approximate assessment of risk and does not indicate specific areas that may be affected by Failure of specific dams." My City, the beginning of the Calleguas Creek Watershed area, upstream of the City of Moorpark, has not updated the 1986 Dam Failure Plan!!!

- #9 - An "exposure analysis was conducted" for "debris flow hazards" instead of a "comprehensive, watershed-by-watershed analysis" (Page 3-20, first sentence, first paragraph).
- #10 - Page 3-21, first paragraph, first sentence states "the Ventura County Flood Control District), Federal agencies, and private landowners have constructed a network of debris basins in the canyons and stream valleys above populated areas."

In the City of Simi Valley, the Big Sky/Whiteface Specific Plan conditioned developers to provide detention basins--M-20(?). The conditioning was not followed through. In March 1992, the City of Simi Valley formally requested that the Board of Supervisors include detention basin fees under the Ventura County Flood Control District's Benefit Assessment Program(BAP) in Zone 3 to meet the National Pollution Discharge and Elimination System(NPDES) permit requirements. There were no public hearings at any of the cities--Camarillo, Moorpark, Thousand Oaks, and Simi Valley--and the County unincorporated areas. The letter that then Simi Valley Mayor Stratton signed was not submitted to the City Councils, and my understanding at the County level is that the

Supervisors' copy was just filed with the Clerk of the Board. Even though this detention basin fee was levied on tax payers in Zone 3, a few years later City staff from the Public Works Department stated to the City Council that the Ventura County Flood Control District did not have a funding mechanism in place!!!

The City then turned around and also submitted Hazard Mitigation Grant Program (HMGP) applications to FEMA for federal moneys to fund 6+ regional detention basins in the mid 1990's.

Then in late 1990's the City submitted a Native American/General CDBG application to the State of California for moneys to cover the same basins.

The Simi Valley FEMA HMGP applications for moneys to cover the basins stated that future assessments would be needed so people living downstream of the basins because they are benefiting from them.

Already the City of Moorpark City Council had agendaized for its January 19, 2005 meeting the matter of "A Resolution Supporting Efforts to Establish a New Stormwater Quality Property-Related Fee and Approval of a New Countywide Implementation Agreement Related Thereto".

The second paragraph, Page 3-34, sentences dealing with the 100-year flood event state "Per capita, the City of Moorpark and the unincorporated county are most affected by floods, with approximately 8 percent of their population at risk. Approximately 6 percent of the population in the cities of Camarillo and Santa Paula are exposed to this hazard. Less than 2 percent of the population within the cities of Ojai, Oxnard, Simi Valley, Thousand Oaks, and Ventura are susceptible to the 100-year flood."

The City of Simi Valley City Council in 2004 approved increasing sewer fees to deal with the TMDLs and other Regional Water Quality Control Board standards.

The Stormwater Quality Program has not been a quality program since there are no monitoring stations below the Rocketdyne Santa Susana Field Laboratory (SSFL). Not all contaminants are taken into account. The City of Simi Valley allows for the Simi Hills Golf Course duck pond water to be dumped in the Alamo Street drain even though there's a stamp stating something to the effect of "no dumping drains to the Arroyo".

- #11 - The debris flow hazard from the 2003 Simi Fire mentions the Tapo Canyon watershed, but the Las Lajas Canyon watershed is not even though the District has been before the Board of Supervisors a number of times in 2004 about the emergency need to remove the debris from the dam because it is over the 25 percent capacity--articles in the local newspaper have also covered the story (Pages 3-20 and 3-21):
- #12 - Page 3-21 states in the second to last sentence of the last paragraph "For purposes of risk assessment, it is estimated that a debris flow would affect up to 200 feet on either side of the stream channel in question. It should be noted that this exposure analysis is not intended to be comprehensive. Debris flows may occur in canyons in more remote areas or other areas not considered in this analysis."
- #13 - The County's "does not warrant the accuracy of the information..." on the GIS Division Maps--the "Warning" is in fine print at the bottom of the page!!! This must be alluded to in the text!!! Maps: Figures 3-1 (Hazard Profile: Flood), 3-2 (Hazard Profile: Dam Failure), 3-3 (ALERT Gauge Network), 3-4 A to D (Hazard Profile: Post-Fire Debris Flow--Fagan Canyon; Fillmore Watershed; Conejo Valley Watershed; and Las Lajas Canyon Dam), 3-5 (Repetitive Loss Structures), 3-6 (Critical Facilities), 3-7 (Land Use in Ventura County), and 3-8 (Population Growth 2000-2010)--Section Three (Risk Assessment).
- #14 - The Notice, Draft Plan, and County website information was available only in English, yet

many County cities and communities have sizable Hispanic/Latino populations.

- #15 - It is stated under Data Limitations, Page 3-29, in Section Three(Risk Assessment) that "It was beyond the scope of this Plan to develop a more detailed or comprehensive assessment of risk (including annualized losses, people injured or killed, shelter requirements, loss of facility/system function, and economic losses). Such impacts may be addressed as possible with future updates of the flood mitigation plan." There is no guarantee that this will occur.
- #16 - Page 3-29, Data Limitations, it is stated "Additionally, due to the difference in units (number count versus kilometers), the jurisdictional totals and total numbers of the potential exposure to critical facilities and infrastructure tables(Tables 3-12 through 3-17) do not include the overall infrastructure totals."
- #17 - It is stated on Page 3-44(Future Development Trends) "The second largest area where growth is expected to occur includes the cities of Camarillo, Moorpark, Simi Valley, Thousand Oaks, and Ventura. These cities are susceptible to flood dam failure, and post-fire debris flow hazards", and on Page 4-8(General Plan) it is stated "The Ventura County General Plan was first developed in 1988...The plan, last amended in January 2004, has a planning horizon of 2010."

The City of Simi Valley has not updated its 1988 General Plan!!! The City has also dragged its feet relative to including the 2000 Census information in its Housing Element!!! It is stated on Page 3-40(Post-Fire Debris Flow) "Simi Valley has the largest number of buildings located within a post-fire debris flow area. Approximately 4,301 residential buildings and 65 commercial buildings are susceptible to post-fire debris flows."

- #18 - While it is stated in Section Six(Continued Public Involvement) "This site will also

contain an email address and phone number to which people can direct their comments or concerns" to date County, and District staff have not responded to my comments and concerns on Watershed Protection District projects, programs, etceteras. Neither do the cities of Moorpark, Thousand Oaks, and Simi Valley. Nor do I get responses from FEMA D.C. or Region IX. The U.S. Army Corps of Engineers was no different. I have had better results with CA OES and Mr. Scott Lyle(Nolte), though it has been like pulling teeth.

If I have been treated this way for years, I have no guarantee that it will not continue in the future even with this statement in the Plan.

#### ADDITIONS

- #1 - Section 1: Page 1-2, 1.2.2, first paragraph, last sentence, give the exact date that the VCWPD's name change was official, and give legislative bill number.
- #2 - Section 1: Page 1-3, third paragraph, last sentence, include the year with the ordinance numbers. The same should be done for Section Four(Capability Assessment) Page 4-6 under FC-18 Ordinance, second paragraph, last sentence For FC-18, FC-20, FC-21, FC-22, FC-23, and FC-27.
- #3 - Include Agendas and approved Minutes of all IACG and Disaster Council meetings from December 2003 to December 2004 under Public Meetings And Notices--Appendix A(Pages A-1 to A-17).
- #4 - Include a map illustrating the District's 4 Zones.
- #5 - Include the rainfall events of 1992, 1995, 1998, and two others for which presidential disaster declarations were issued on Pages 3-3 and 3-4 under Disaster History. Also, include 2005, January of, since California Governor Arnold Schwarzenegger issued a disaster declaration for Ventura County.

In 1992, there was a 3½ to 4 ½ feet wall of gushing water through the Simi Hills Golf Course over the Las Lajas Creek road into the Las Lajas Creek--the volume of water contributed to the damage of the City of Moorpark bridge.

- #6 - Include a table listing the levee systems in Section Three--Risk Assessment--as done for dams and basins.
- #7 - Include a table listing the flood control channels in Section Three--Risk Assessment--as was done for dams and basins.
- #8 - Include definitions for dam, and basin under Section Three--Risk Assessment.
- #9 - Provide the equivalency of "acre-feet" to gallons of water (Page 3-9; Dam Failure Inundation - Nature of Disaster).
- #10 - Provide the equivalency of "cubic feet per second" to gallons of water (Page 3-9; Dam Failure Inundation - Nature of Disaster).
- #11 - Page 3-10, to Table 3-2 add an "\*" for a footnote at the bottom of the chart stipulating "dams more than 25 feet in height and hold back more than 15 acre-feet of water or hold more than 50 acre-feet of water with a dam more than 6 feet in height" (Page 3-9 second paragraph, second sentence).
- #12 - Include a table with all of the dams and basins names and locations (city, community, county unincorporated area, etc.) in Section Three--Risk Assessment.
- #13 - Page 3-12, add the word "Canyon" to North Simi Drain Dam (Zone 3).
- #14 - Include a table with the type of dam each dam listed is (earthen, etc.) in Section Three--Risk Assessment.

- #15 - Under Section Three include discussion on the waters of the United States. Or did I miss this information?
- #16 - Page 3-13, add at the end of the last sentence of the second paragraph under **Location, Probability of Occurrence, and Magnitude** the following words "Dam inundation studies and maps are approved by the Governor's Office of Emergency Services(OES).
- #17 - Page 3-17, include Lang Creek Detention Basin, and Lang Creek Debris Basin in the table.
- #18 - Include a table listing the smaller watersheds in Section Three--Risk Assessment.
- #19 - Include a table listing "only large basins" that "are capable of resisting the forces that accompany" "debris flow fronts"(Page 3-16). in Section Three--Risk Assessment.
- #20 - Page 3-18, include a paragraph on the 2005, January of, mudflows event.
- #21 - Include a table listing all of the fires under 1,000 acres, from 1953-2003 in Section Three--Risk Assessment.
- #22 - To the last paragraph, under **Post-Fire Debris Flow**(Page 3-40), in Section Three(Risk Assessment), add the following word to the first sentence "Countywide only 19 critical facilities are susceptible to a post-fire debris flow. Seventeen of the 19 structures are bridges and dams. Only one communication facility and one school are located within a post-fire debris flow area."
- #23 - Page 3-45, add the year 2004: Simi Valley voters approve ballot Measure C, limiting residential construction to an average of \_\_\_\_ units a year.
- #24 - Page 6-2, add faxing capability along with e-mail and phone number(Continued Public Involvement).
- #25 - Page 4-13, Table 4-3, include "Y" or "N" for "Hazard Mitigation Grant Program", "Pre-

Disaster Mitigation Grant Program", and "Flood Mitigation Assistance Grant Program" for the District, and for the County include a "Y" or "N" for "Facilities maintenance and stormwater - benefit assessment on property tax".

#### CHANGES

- #1 - Page 2-1, **Meetings**, change November 2004 to December.
- #2 - Page 2-3, first paragraph, second sentence, "The county announced the meetings times and locations on their website", change to its.
- #3 - Page 1-3, last paragraph, third from bottom of page sentence "In addition, the District and FEMA partner to conduct a FIS for the Calleguas Creek and other tributaries", change to conducted, or currently conducting.
- #4 - Pages 2-3 and 2-4, **State and Federal:**, separate State from Federal information for **Existing Plans Or Studies Reviewed**.
- #5 - Appendix A cover page, separate **Public Meetings** from **Notices**.
- #6 - Appendix A cover page, label only **Meetings** since the IACG meetings were not open to the public!!!
- #7 - Page 3-10, separate State and Non-State Dams from Basins.
- #8 - Page 3-10, Table 3-2 should read "State-Size Dams Operated by Ventura County Watershed Protection District", otherwise it is confusing when read the information on Page 3-11; Table 3-3.
- #9 - Page 3-13, first sentence, third paragraph, Figure 3-3 change to Figure 3-2. Figure 3-3 is the ALERT Gauge Network. Figure 3-2 is the Hazard Profile: Dam Failure. I did not see any discussion relative to Figure for ALERT. Did I miss it?

- #10 - Page 3-18, separate the statement beginning with "Mudflows also occurred" and ending with "a moving boulder" from the first paragraph, and make it a separate paragraph since it includes the 1971 event. Otherwise, keep the 1969 mudflow with the first paragraph, and have a separate paragraph on the 1971 mudflow event.
- #11 - Since Page 3-21's, first paragraph, second sentence refers to Table 3-5 (Summary of Ventura County Watershed Protection District Debris and Detention Basin Data) include the Table after Page 3-21.
- #12 - Table 3-6 is mentioned on Page 3-20, but it is located on Page 3-19. Change the page order. Actually, the ALERT map should be located after Page 4-12 to coincide with the discussion.
- #13 - Page 4-11, first paragraph, last sentence that reads "The program are as follows:". Change to programs.
- #4 - Page 5-8, Action Item #3, the statement "Retrofit dams with inadequate emergency spillway capacity to minimize the possibility of dam failure during storm events" should read "with adequate..."

#### QUESTIONS

1. Will the Board of Supervisor's adoption date be reflected on the cover page of the Final document?
2. Why are the names of the Local Hazard Mitigation Planning Group, the IACG participants, and the Disaster Council appointments not listed under "Acknowledgements" (Page vii)?
3. Why are comments on the Draft Flood Mitigation Plan submitted to the Ventura County Watershed Protection District, and not to URS?
4. Were the rainfall events of 1992, 1995, 1998 and 2005 considered 50-year, 75-year, 100-year, or other volume year flooding events?

5. Why are "blue-line" channels not mentioned-- "red-line" channels are mentioned on Page 1-3, second paragraph, second sentence?
6. Were IACG and Disaster Council "meetings times and locations" "announced" on the county's website per statement at the top of Page 2-3? I am only familiar with the September 2004 meeting notice, otherwise I would not have written to Sheriff Bob Brooks on August 4, 2004 asking about the Plan--I did not see anywhere any information about the process. And I was aware of the Disaster Council December meeting because I spoke to OES staff. It was not announced on the website!!!
7. How were the "individuals" mentioned in the paragraph below Correspondence/Publications on Page 2-3 contacted by the District?
8. Where are the "repetitive loss homeowners" under Local, Page 2-3, located?
9. Why does it stipulate "Consultants and District staff reviewed and incorporated..." under Existing Plans Or Studies Reviewed? Was someone else besides URS involved? Or, should the statement read "Consultant and District staff..."?
10. Is the FEMA 2004 FIS for Calleguas Creek the Nolte Study recently submitted to FEMA? If so, was the Document submitted by Nolte to FEMA's D.C. office, or to Region IX?
11. Did URS staff read flood related ordinances for the County and those of its 10 cities?
12. Why were representatives from the Red Cross and RACES, etceteras allowed to attend the IACG meetings if the agendas stipulate "This meeting is Open to emergency services coordinators representing Cities, Special Districts and the Military" (Pages A-1, A-4, A-8, A-11, A-15, and A-18)? I have tried in vain to attend my City's emergency planning meetings, and have not been successful in getting it to include representatives from the Planning Commission, Neighborhood Councils, and Rocketdyne.

13. Are dams and basins listed together because the same thing? Are basins not for debris accumulation and dams for holding back water?
14. Why is the Dry Canyon Dam not listed in Table 3-4 (Page 3-12)? What happen to it?
15. Since the maps in Section Three are in black and white, are the "redline" and "blueline" channels depicted? If not, then add to my ADDITIONS section a request for a map depicting these channels.
16. Why is the Sinaloa(?) Dam--located between the Rancho Simi Recreation and Park District's golf tee-off area and Wood Ranch housing development--not listed in the table with dams and basins? Did I miss it, or do I have the name wrong, or is it not listed because it falls under an HOA (Pages 3-12 and 3-17)?
17. Since the Simi Valley area is not mentioned on Page 3-18 relative to the debris-flow movement due to the 1969 storms, what then caused the stormwater flow in the Arroyo Simi to jump the banks and cause the unearthing of caskets in the Simi Public Cemetery in 1969? The road leading to Moorpark College was either closed, or there was talk of closing it due to the extreme volume of water in the Arroyo Simi.
18. Was the rainfall of 1969 considered a 50-year, 75-year, 100-year, or 500-year event?
19. Why is there no "comprehensive, watershed-by-watershed analysis of debris flow hazards" (Page 3-20, first sentence, first paragraph)? Do any State of California counties have such an analysis? If so, which counties--or give at least one example?
20. Why is it stated in the first sentence of the first paragraph on Page 3-21 "the District (and its predecessor, the Ventura County Flood Control District)" and not "the District (formerly the Ventura County Flood Control District)"?

21. When were the "Current District design standards" Requiring "a basin to have enough storage to hold 125 percent of the estimated 100-year debris inflow so that it can reach the 25 percent storage level and still have sufficient space for the expected 100-year debris flow" implemented-- give complete date--(Page 3-21)?
22. Are "institutional dormitory facilities" referring to colleges, universities only, or are hospitals also included since there is no separate designation for "hospitals" (critical care facilities), and "nursing homes" does not cover "hospitals" (Page 3-24, under Commercial and Residential Structures)?
23. Does "multi-family dwellings" include apartments, Townhomes, and condominiums only (Page 3-24, under Commercial and Residential Structures)?
24. Does "temporary lodgings" include motels, hotels only, or also apartments (Page 3-24)?
25. How are "parking facilities" counted (Page 3-24)? Why are they counted?
26. What are the types of businesses ("commercial buildings") that fall within the "entertainment" designation (Page 3-24)?
27. Is the entire "mobile home park and campground" "located near the Ventura River close to the coast" counted as one repetitive loss structure by FEMA, and not each mobile home (Page 3-25)?
28. Why were the number of police and fire stations not listed under Critical Facilities and Infrastructure (Page 3-27); everything else was?
29. Is the City of Moorpark's 100-year flood event vulnerability (8 percent) due in part to its location downstream of the Calleguas Creek watershed Simi Valley reach, or only to its own topography, or a combination of both (Page 3-34)? If Simi Valley area impacts its vulnerability, by what percent?

30. Is the City of Camarillo's 100-year flood event vulnerability (6 percent) due in part to its location downstream of Simi Valley, and Moorpark, or only to its own topography, or a combination of all three (Page 3-34)? If Simi Valley and Moorpark areas impact its vulnerability, by what percent?
31. Why are "assumptions" made "about the initial condition of the reservoir, type of storm inflow, type of breach, and time of breach development" to "define" "dam failure boundaries"? Can't some of these be accurately analyzed through visual inspection since Page 3-37 states "Almost half of the county's total critical facilities are at risk of a dam failure hazard...75 percent of all electrical power facilities and emergency centers ...49 percent of all schools; and 30 percent of all hospitals..."
32. What does the \$2.5 million replacement costs for "state-size, debris, and detention dams" (Page 3-43) cover: spillways, improvements, landscaping?
33. Why is the Ventura River Watershed not labeled on Figure 3-4A like basins and watersheds in a rectangular box, or is that the same as the Buenaventura Watershed?
34. Why is the Santa Clara River Watershed not labeled on Figure 3-4B in a rectangular box?
35. Why is the Calleguas Creek Watershed not labeled on Figures 3-4C and 3-4D in a rectangular box?
36. Did the District place a notice in the local newspapers about the Plan?
37. Why is "Post-fire debris flow" "not addressed as a separate hazard in the" County's "General Plan"? (Page 4-8)?
38. Does the statement "Analyze plan amendments that affect the physical or built environment" on Page 6-1 (Implementation Through Existing Programs) refer to existing or new "physical or built..."?

39. Will third parties, specifically members of the public, be able to access the FEMA DFIRMs, or do members of the public have to purchase the information? If so, has a cost been determined?
40. What is the name of the "private weather consultant" mentioned on Page 4-12 (ALERT Storm Watch System), second paragraph, first sentence?
41. Is there an ALERT system above, below, or near La Conchita? If so, when was it implemented? Where is it located?
42. Will the Final Flood Mitigation Plan be posted indefinitely on the District's website? Will modifications be posted on the website separately? Will only amended versions be posted?
43. Did staff mean the word "develop" instead of "development" under Objective 3.C, Action 3.C.1? (Page 5-4)
44. Why, if the District put the Plan together with URS, is it stated on Page 5-8, under Action Item #2, "Work with the Watershed Protection District"?
45. What kind of "local funding" is anticipated-- mentioned on Page 5-10 under Potential Funding Source for Action Item #8?

#### CLARIFICATIONS

1. Page 4-13, "Withhold spending in hazard-prone areas." in Table 4-3!!!
2. Page 4-13, "Only with assent of the property owners/voters". If this is related to a ballot, then state "By vote of the property owner/voters".
3. Page 4-13, "Nexus required".
4. Page 5-3, "Goal 2: Promote public understanding, support, and demand for flood hazard mitigation."

5. Page 5-4, Action 3.B.2, "Limit the uses in floodways to those tolerant of occasional flooding, including but not limited to agriculture, outdoor recreation, and natural resource areas."
6. Page 5-10, Action Item #8, "Implement minor Physical flood mitigation projects that do not Duplicate the flood-prevention activities."

SECTION FIVE (Goals, Objectives, and Actions)

- #1 - Page 5-1, Objective 1.A, Action 1.A.3: No to "Encourage". Must stipulate "Send".
- #2 - Action 1.A.2: Yes to "Host", No to "Attend".
- #3 - Objective 1.B: No to "Encourage". Must stipulate "Ensure".
- #4 - Action 1.C.1: Add "with a Board of Supervisors public hearing."
- #5 - Page 5-2, Objective 1.E, Action 1.E.1: No to "encourage". Must stipulate "ensure".
- #6 - Action 1.E.2: "effectively managing public involvement" will require that responses and answers come from all government agencies!!!
- #7 - Action 1.E.3: "DFIRM database into the District's GIS" will require that the information is also available to third parties, specifically members of the public!!!
- #8 - Page 5-2, Objective 1.E, Action 1.E.4: No to "As a CTP assume responsibility for updates to the DFIRM, including incorporation of FEMA LOMR/LOMAS into flood layers as they occur."
- #9 - Objective 1.F: No to "Consider". Must stipulate "Join the Community Rating System(CRS)."
- #10 - Action 1.F.3: No to "respond to CAV comments as necessary." All comments must be responded to!!!

- #11 - Page 5-3, Objective 2A, Action 2.A.2: No to "street fairs". Emergency information must be imparted at Emergency Preparedness Expos in each city so that the citizenry concentrates on the issue at hand, otherwise the arts and crafts, and discussions with businesses will take away from what are trying to accomplish "Educate the public to increase awareness of flood hazards and opportunities for flood mitigation actions." (Objective 2.A). People are more prone to discard emergency information.

Page 5-5, Objective 4.A states "Increase risk awareness and level of preparedness for dam failure inundation."

Page 5-6, Objective 5.A states "Reduce the existing potential for post-fire debris flows." Objective 5.B states "Educate the public to increase awareness of post-fire debris flows and opportunities for mitigation actions."

If there is no other way, then a "street fair" I agree, but not as a substitute. Combination Street Fair/Emergency Preparedness Expo is held in Simi Valley. The City used to hold an Expo by itself, but was done at the Simi Valley Police Station site. I am opposed to the combination.

- #12 - Page 5-3, Action 2.A.3: The use of County agencies' "websites" must be "user friendly" and have "printer friendly version" for all information, and be thorough. The County's website does not have "Search" capability. The Sheriff's site really needs work relative to OES and news relative to emergency situations. It does a good job with crime matters.

IACG and Disaster Council Agendas and Minutes must be posted.

- #13 - Page 5-7, Objective 6.A states "Address data limitations regarding Repetitive Loss properties." It's about time.

**SECTION FIVE (Implementation Strategy)**

- #1 - Page 5-8, Action Item #1: The entire City of Simi Valley must be included in the current FEMA/County/Nolte study!
- #2 - Action Item #2: One year not "3" under Implementation Timeline since the item is a "High" priority.
- #3 - Action Item #3: An alert/alarm flood warning system for the Arroyo Simi, and the Las Lajas Dam are a must ASAP!!!
- #4 - Page 5-9, Action Item #4: Two or three years since a "Priority Level" was not given. If High, then 2 years. If Medium, then 3 years under Implementation Timeline.
- #5 - Action Item #5: One year instead of "2" under Implementation Timeline since the workshop covers "Floodplain Management and Duties of the Local Administrator"!!! Priority Level must be High.
- #6 - Action Item #6: Two years instead of "3" under Implementation Timeline.
- #7 - Page 5-10, Action Item #7: Two years instead of "5" under Implementation Timeline.

Plan Coordinator, I am commenting now on the Draft Plan because I wasn't sure if the Flood Mitigation Plan was the current FEMA/County Nolte Associates FIS. I had not heard back from FEMA D.C., or Region IX, as to when that study might go through the public review process. I also had to cross reference numerous documents. But, the District, County Board of Supervisors, the Cities of Simi Valley, Moorpark and Thousand Oaks, CA OES, FEMA, U.S. EPA, and U.S. Army Corps of Engineers are well aware of my concerns relative to the Calleguas Creek Watershed area--floodplain, and emergency management, flooding, fires, post-fire debris flows, and funding mechanisms at all government levels, as well as the U.S. EPA and CA DTSC with regards to the Rocketdyne Santa Susana Field Laboratory.

I have addressed the subject at City Council and Board of Supervisors meetings, in letters to these bodies, and state and federal government agencies since 1992 when the National Pollution Discharge and Elimination System Permit process was discussed at the City of Simi Valley City Council meeting, and when the Simi Hills Golf Course had a 34 to 44 feet wall of gushing water over the road located over the Las Lajas Creek.

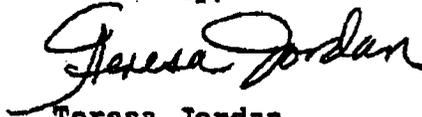
Plan Coordinator, I have tried to be as meticulous as possible with regards to spelling, and format in order to get my comments in within the specified timeframe. I am not a professional and I am still not well versed with the computer that I am using, so there might be capitalized letters at the beginning of some sentences. I have tried to include as often as possible pages, sentence and paragraph location in order for you to cross-reference my information expeditiously.

Plan Coordinator, please note that I have put my pertinent evidentiary information in report form, but I did not get it bound in time. The report will be available to the District next week. Please note that the same was done with the State of California Governor's Office of Emergency Services (OES) for the Draft Multi-Hazard Mitigation Plan. I had also faxed the entire report. Agency personnel were gracious enough not to complain since at that time my fax machine was very slow and the report was a couple of hundreds of pages. I have a new, speedier one presently. Should you want the report faxed instead, please call me at (805) 522-5016.

Plan Coordinator, please note that Alice Bitting (805) 522-8847, and Ginn Doose (805) 522-3779 concur with my comments and concerns.

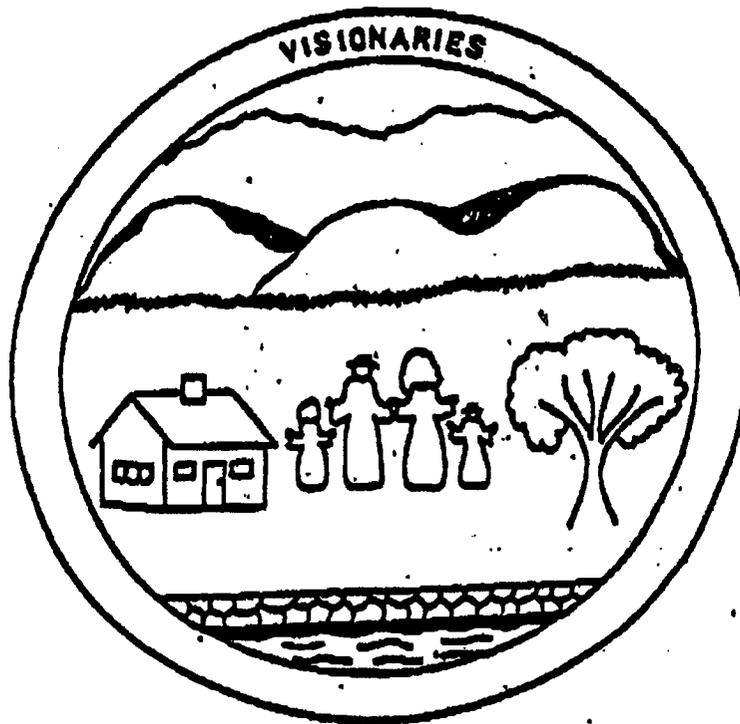
Plan Coordinator, I would really appreciate written answers to my letter.

Sincerely,



Teresa Jordan

**RESPONSE TO VENTURA COUNTY  
WATERSHED PROTECTION  
DISTRICT'S FLOOD MITIGATION  
PLAN**



**TERESA JORDAN  
JANUARY 21, 2005**

## CORRESPONDENCE AGENDA

The following matters are being presented to the Board for information. These items require no action or are not ready for Board consideration. The Clerk of the Board may refer these matters to the County Departments and Agencies for acknowledgement, investigation and report back, direct action or response as appropriate. Report back to the Board may appear on Agenda for action by the Board of Supervisors or for informational purposes upon dates indicated below as appropriate.

### COMMUNICATIONS RECEIVED AND FILED BY THE CLERK OF THE BOARD ON BEHALF OF THE BOARD OF SUPERVISORS, WITH COPIES FURNISHED AS INDICATED.

1. Letter from Khatchik "Katcho" Achadjian, Chair of the San Luis Obispo Board of Supervisors, regarding a letter of support to the California Energy Commission to evaluate the long-term implications associated with the continuing accumulation of spent fuel at California's operating nuclear power plants.
2. Letter from George Gather requesting a review and correction of his police record concerning allegations of child molestation.  
**SHERIFF'S DEPARTMENT/DISTRICT ATTORNEY**
3. February 6, 2006 letter from Teresa Jordan to Mike Sedell, Simi Valley City Manager, regarding Ms. Jordan's appeal of the Federal Emergency Management Agency (FEMA) County of Ventura Preliminary Flood Insurance Study (FIS) and Flood Insurance Rate Maps (FIRMS).  
**PUBLIC WORKS AGENCY/WATERSHED PROTECTION DISTRICT**
4. Letter from Carol Dean Williams regarding fees for public records requests.
5. February 14, 2006 letter from Teresa Jordan to Mike Sedell, Simi Valley City Manager, regarding Ms. Jordan's appeal of the Federal Emergency Management Agency (FEMA) County of Ventura Preliminary Flood Insurance Study (FIS) and Flood Insurance Rate Maps (FIRMS).

**ALL OF THE ABOVE ITEMS HAVE BEEN FURNISHED TO  
EACH MEMBER OF THE BOARD OF SUPERVISORS**

Attn: Clerk of the Board,

This information is for the Board's 2/28/2006 meeting's Correspondence Agenda.  
Thanks. *MJ Jr*



RECEIVED  
FEB 08 2006

OFFICE OF CLERK  
BOARD OF SUPERVISORS

TERESA JORDAN  
3152 SHAD COURT  
SIMI VALLEY, CA 93063  
TELEPHONE NO. (805) 522-5016

TO: Ventura County Board of Supervisors  
Hall of Administration  
800 S. Victoria Avenue  
Ventura, CA 93009

FAX NO.: 677-8711

DATE: February 8, 2006

NO.. OF PAGES: 7 (includes cover sheet)

RE: February 6, 2006 letter to Mr. Mike Sedell, City of Simi Valley City Manager,  
on my appeal of the FEMA County of Ventura Preliminary FIS and FIRMS.

RECEIVED  
CITY OF SIMI VALLEY

06 FEB -7 PM 2:17

CITY MANAGERS OFFICE

3152 Shad Court  
Simi Valley, CA 93063  
February 6, 2006

Mr. Mike Sedell, City Manager  
City of Simi Valley City Hall  
2929 Tapo Canyon Road  
Simi Valley, CA 93063

Re: Appeal of the FEMA County of Ventura Preliminary Flood Insurance Study (FIS) and Flood Insurance Rate Maps (FIRMS)--Community Number: 060413 (Ventura County Unincorporated Areas), Community Number: 060421 (City of Simi Valley), Community Number: 060422 (City of Thousand Oaks), and Community Number: 060712 (City of Moorpark).

Dear Mr. Sedell:

I am appealing the FEMA County of Ventura Preliminary Flood Insurance Study (FIS) and Flood Insurance Rate Maps (FIRMS) Panel 980 of 1275 for the following reasons. Please note that this letter addresses a few of the map panels, and some of the study's sections. The rest of my appeal comments will be in a follow-up letter.

FLOOD INSURANCE RATE MAPS

- #1 - Map Number 06111C0980E labels Bard Reservoir/ Wood Ranch Dam as "Lake Piru". This impacts the analyses data for the Cities of Camarillo, Moorpark, Simi Valley, and Thousand Oaks, as well as the Ventura County unincorporated areas in the Calleguas Creek Watershed.
- #2 - Map Number 06111C0862E does not have the Las Llajas Canyon Dam labeled.
- #3 - Map Number 06111C0864E labels Las Llajas Creek as Las Llajas Canyon (same as the 1997 Panel; was appealed by me, but efforts were in vain).
- #4 - Map Number 06111C0866E does not have the Las Llajas Canyon Dam labeled.

FLOOD INSURANCE STUDY

#1 - Section 110 of the Flood Disaster Protection Act of 1973 (Public Law 93-234), which ensures an "equitable balancing of all the interests involved in the setting of BFEs" (Page 1, 2<sup>nd</sup> to last paragraph of FEMA's November 14, 2005 letter to Mr. Mike Sedell, City of Simi Valley City Manager, has been violated by the County of Ventura because it has not replied to my letter that addressed the Draft Multi-Jurisdictional Hazard Mitigation Plan (an erroneous and incomplete Disaster Mitigation Act of 2000 required document; approved by the Board of Supervisors as such). This and the Ventura County Watershed Protection District not replying to my letter that addressed the Draft Flood Mitigation Plan (an erroneous and incomplete document; approved by the Board of Supervisors as such) have significantly curtailed my review of the preliminary study (it has been over 1 year since I submitted both of my letters) as a layperson, and person of interest.

For a decade, the County of Ventura, and the Ventura County Flood Control District (even under its new name: Watershed Protection District) have not replied to my letters on various local and regional issues.

#2 - Even though the FIRMS and FIS are supposed to be updated every 5 years, and even though a community is responsible for making the request, the County and most of its cities have not undertaken this most crucial documentation within reasonable time periods. Yet a lot of business and residential development projects have been built, most especially in the Calleguas Creek Watershed area (Cities of Camarillo, Moorpark, Simi Valley, and Thousand Oaks).

In the City of Simi Valley, the 1988 General Plan has not been updated, nor has its 1986 Dam Failure Response Plan, and its 2001 Multi-Hazard Functional Plan's Evacuation section may still be incomplete. The 1999 Safety Element Update no longer included copies of the flood maps.

- #3 - Only the City of Simi Valley's westernmost boundary line was studied. The 1997 City of Simi Valley FIS was done in piecemeal fashion and rushed. The County of Ventura unincorporated islands adjacent to the City of Simi Valley were not included in the 1997 FIS. There is therefore no comprehensive review of the cumulative flooding impacts in this part of the County, nor to the downstream communities.
- #4 - The City of Simi Valley is not "representative of all local interests"--as stated on Page 2 of the November 14, 2005 letter to Mr. Mike Sedell from FEMA--as it doesn't respond to my letters on issues that it is not legally required to do so. I also don't get copies of the City's Final Budgets even though I make the request.
- #5 - FEMA also for years, did not respond to my faxed letters, and telephone messages. The only reason that the Agency started following through in the fourth quarter of 2005 is this federal government public review process(FIS and FIRMs).
- #6 - Communities(County and its participating cities) can consolidate "interested party" appeals(Page 2 of the November 14, 2005 letter from FEMA to Mr. Mike Sedell).
- #7 - Only scientific and technically minded comments are going to be considered, with the possibility of taking text correction into consideration (Pages 1 and 2 of the November 14, 2005 letter to Mr. Mike Sedell from FEMA). According to FEMA's Proposed Flood Elevation Determination Rule notice under "Summary", "Technical information or comments are solicited..."
- #8 - The document is erroneous and incomplete.
- #9 - The City of Simi Valley's North Simi Drain Canyon Regional Stormwater Detention Basin, and the Dry Canyon Regional Stormwater Detention Basin were not included in the study. In 1995, or 1996 the City submitted HMGP applications to FEMA for six regional stormwater detention basins --the basis for my investigation requests to the

FEMA Inspector General, Mr. Opfer, (then to the DHS IGs) from 1999 to 2005 (OIG Complaint Number: 0403210).

- #10 - Flooding events for the years 1992, 1995, and 1998 were not covered, yet these storms are mentioned in the Ventura County Watershed Protection District's (formerly Flood Control District) Benefit Assessment Program annual report to the Board of Supervisors. Also, included should be the late 2004 and early 2005 flooding events.
- #11 - The Consultation Coordination Officer's (CCO) meetings for this "countywide" study were not included on Page 5. It will not do to just state "For this countywide study, the Initial CCO meeting was held at the Ventura County Government Center on July 29, 2004."
- #12 - The document's page sequencing is off. Page 28 is mislabeled "6". Between Pages 5 and 6 at the beginning of the document has a Page 22 that should be Page 7 and so on.
- #13 - Page 114 (Table 7, "Community Map History") is missing.
- #14 - Page 1: Instead of a page number for section 3.2 (Hydraulic Analyses), it is stated "Error! Bookmark not defined."
- #15 - Page 1: Section 1.1 (Purpose of Study), first paragraph, first sentence, states "This countywide Flood Insurance Study..." This flood insurance study is not a countywide effort.
  - a. Only some of the unincorporated areas of the County, and the Cities of Camarillo, Moorpark, Simi Valley, and Thousand Oaks were studied.
  - b. The Cities of Fillmore, Ojai, Oxnard, Port Hueneme, San Buenaventura, and Santa Paula are mentioned in the document, but for some of these communities information dating back to the 1970's and 1980's is being included.

thus grandfathering any inaccurate, and incomplete hydrologic and hydraulic data.

[The following information is from Pages 2 & 3.]

- Fillmore 1978 (completed 1977);
  - Ojai 1978 (completed 1977);
  - Oxnard 1985 (completed 1977) (coastal areas 1984) (revised study 1984 but unpublished, completed 1983);
  - Port Hueneme information was excluded (\*);
  - San Buenaventura 1987 (completed 1983) (coastal areas no date was given (\*));
  - Santa Paula 1997 (completed 1978 (\*!!!)).
- c. The local newspaper legal public notice mentions the Ventura County Unincorporated Areas, and the Cities of Camarillo, Moorpark, Simi Valley, and Thousand Oaks. Not included are Cities of Fillmore, Ojai, Oxnard, Port Hueneme, San Buenaventura, and Santa Paula.

#16 - While it is understandable to combined all of the County's unincorporated areas for textual purposes, not giving each community its own identifiable number leads to the loss of its unique location in the FIS and the FIRMS.

Also, by referring to the County of Ventura's unincorporated areas collectively" (Page 1, Section 1.1, first paragraph) instead of individually gives the false impression that all such communities have been studied.

#17 - Page 1: Section 1.1 (Purpose of Study), the City of Port Hueneme has been excluded from the first paragraph (Page 1).

Port Hueneme was also excluded from Section 1.2 (Authority and Acknowledgments) on Page 2.

Port Hueneme is also missing from Table 1 (Initial and Final CCO Meetings) on Page 5.

Port Hueneme was excluded from Section 2.3 (Principal Flood Problems) on Page 22.

Port Hueneme is missing from Section 2.4 (Flood Protection Measures) on Page 32.

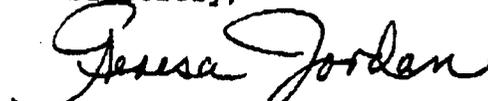
Port Hueneme was also excluded from Section 3.1 (Hydrologic Analyses) on Page 40.

Port Hueneme is missing from Section 3.2 (Hydraulic Analyses) on Page 66.

- #18 - The document does not contain all of the channel improvements that have been undertaken throughout the study area.
- #19 - A "Table" is not included for the "Effective impervious percentages" that "were assigned each developed area using Figure 2 in the USGS report Digital Simulation of the Effects of Urbanization on Runoff in the Upper Santa Ana Valley, California (U.S. Department of the Interior, 1974)" for which the base maps were updated "in the field to ensure that developed areas used in this study conform to present conditions" because of the "dynamic growth" experienced "since the most recent mapping revision" in "many areas of Ventura County" (Page 36).
- #20 - Peak discharges for Calleguas Creek, Ventura River, Santa Clara River, San Antonio Creek, Thatcher Creek, Sespe Creek, Reeves Creek, Conejo Creek, Revolon Slough, Stewart Canyon Creek, and Santa Paula Creek were obtained from USACE hydrology reports prepared in 1970, 1973, 1977, and 1978 (Pages 35 and 36).
- #21 - Peak discharges for all other streams in the study area "were computed".

Mr. Sedell, not only do I appeal the Preliminary FIS and FIRMs, but I oppose them as well.

Sincerely,

  
Teresa Jordan

Attn: Clerk of the Board,  
This information is for the Board's 2/28/2006 meeting's Correspondance Agenda.  
Thanks. M.J.



RECEIVED

FEB 17 2006

OFFICE OF CLERK  
BOARD OF SUPERVISORS

TERESA JORDAN  
3152 SHAD COURT  
SIMI VALLEY, CA 93063  
TELEPHONE NO. (805) 522-5016

TO: Ventura County Board of Supervisors  
Hall of Administration  
800 S. Victoria Avenue  
Ventura, CA 93009

FAX NO.: 677-8711

DATE: February 17, 2006

NO. OF PAGES: 10 (includes cover sheet)

RE: February 14, 2006 letter to Mr. Mike Sedell, City of Simi Valley City Manager,  
on my appeal of the FEMA County of Ventura Preliminary FIS and FIRMs.

RECEIVED  
CITY OF SIMI VALLEY

06 FEB 15 PM 4: 01

CITY MANAGERS OFFICE

3152 Shad Court  
Simi Valley, CA 93063  
February 14, 2006

Mr. Mike Sedell, City Manager  
City of Simi Valley City Hall  
2929 Tapo Canyon Road  
Simi Valley, CA 93063

Re: Appeal of the FEMA County of Ventura Preliminary Flood Insurance Study (FIS), and Preliminary Flood Insurance Rate Maps (FIRMs).

Dear Mr. Sedell:

This letter is a follow-up to my February 6, 2006 letter submitted on February 7, 2006. Please note that the first sentence of the first paragraph of my February 6, 2006 letter should have read "I am appealing the FEMA County of Ventura Preliminary Flood Insurance Study (FIS) and Flood Insurance Rate Maps (FIRMs) for the following reasons..."

FLOOD INSURANCE RATE MAPS

- #1 - Map Number 06111C0861E at the fringe has an illegible "joins panel" number because the information has been superimposed.
- #2 - Map Number 06111C0855E at the fringe has an illegible "joins panel" number because the information has been superimposed.
- #3 - Map Number 06111C0855E has Tripas Canyon, Tripas Canyon Tributary, East Fork Tripas Canyon Tributary, and Tripps Canyon Road labeled. Is "Tripps" correct, or is this supposed to also be labeled "Tripas"?
- #4 - Map Number 06111C0835 joins panel 06111C0855E, why is "Tripas Canyon" not labeled?
- #5 - Map Number 06111C0861E has Dry Canyon labeled, but the Dry Canyon regional stormwater detention basin is not labeled.

- #6 - Map Number 06111C0844E has the words "Limit of Detailed Study" in the general vicinity of Lowery Street/Bus Canyon Tributary, and Heyneman Lane/Holbrook Avenue; and the words "Limit of Floodway" in general vicinity of Williams Street. What is the difference--I did not find "Limit of Floodway" in other panels? Or, is this a type-0?
- #7 - Map Number 06111C0842E labels the North Simi Drain Tributary, but the North Simi Drain Canyon regional detention basin is not labeled.
- #8 - Map Numbers 06111C0837E, 06111C0841E, 06111C0842E and 06111C0861E, as well as 06111C0862E, and 06111C0868E label the Ronald Reagan Freeway as State Highways 118. Why is the Ronald Reagan Freeway labeled as such?
- #9 - Under the NOTES TO USERS areas of the panels, it is stated "Base Map information shown on this FIRM was derived from U.S. Geological Survey Digital Orthophoto Quadrangles produced at a scale of 1:12,000 from photography dated 1994 or later." Does "later" mean topographical photographs taken after 1994? Or, that the photography pre-dates 1994?
- #10 - Under the NOTES TO USERS areas of the panels, it is stated "The map reflects more detailed and up-to-date stream channel configurations than those shown on the previous FIRM for this jurisdiction." Does "jurisdiction" refer to the County or the City since this is a "countywide" effort?
- #11 - Under the NOTES TO USERS areas of the panels, it is stated "The floodplains and floodways that were transferred from the previous FIRM may have been adjusted to confirm to these new stream channel configurations. As a result, the Flood Profiles and Floodway Data tables in the Flood Insurance Study Report (which contains authoritative hydraulic data) may reflect stream channel distances that differ from what is shown on this map."

Is the word "confirm" supposed to read "conform"?

The FIRMs' stream channel distances must not differ from the Flood Profiles and Floodway Data tables in the FIS.

- #12 - With regards to the statement "Corporate limits shown on this map are based on the best data available at the time of publication. Because changes due to annexations or de-annexations may have occurred after this map was published, map users should contact appropriate community officials to verify current corporate limit locations..."

What is the date of the "publication"?

Are the "appropriate community officials" to be contacted the same as the "MAP Repositories" that are listed for the County and its 10 cities?

- #13 - There is no consistency for the location of the County's 10 cities' "MAP Repositories"--public works, community development services, and planning. Why is the information available in different departments?

#### FLOOD INSURANCE STUDY

- #1 - To Page 1 of the document add a sentence that refers to the name change of the Ventura County Flood Control District to the Ventura County Watershed Protection District, give the date that this change went into effect.
- #2 - Pages 7 and 8 are confusing because of the words "This study" since some years are so outdated, and possibly related information has been separated into paragraphs.
- #3 - This confusion can be avoided by having the textual information under Sections 2.1 (Scope of Study) and 2.2 (Community Description), Pages 5-12, formatted in the same manner as the textual information under Section 2.3 (Principal Flood Problems).

Section 2.1, underline the subjects of "Floods", "Flooding", "Detailed Methods Streams", "Approximate Methods Streams", "Principal Streams", "Improved Concrete-Lined Streams", "This Study", etceteras. Or, separate by community since "This study", or revision is not identified by locality.

- #4 - Section 2.2, underline the subjects of "Location", "Highways", "Population", "Climate", "Average Annual Rainfall", "Snow", "Topography", "Mountain Ranges", "Watersheds", etceteras.
- #5 - The reader shouldn't have to be cross-referencing almost everything in the document in order to make heads and tails of the textual information especially when various communities are covered that the reader has no familiarity with.
- #6 - Page 10, the 2000 Census information was given only for the 753,197 County population. Excluded was the information for the percentage of increase between the 2000 and 1981 populations.
- #7 - Page 10, the 2000 Census population information for the incorporated areas was not given.
- #8 - Page 10, the 2000 Census population information for the unincorporated portion of the County was not given.
- #9 - Page 10, the 1960 population information is not broken down.
- #10 - Page 12, all watersheds and tributaries must be listed along with the major flood boundaries and floodways in a separate paragraph, or sentences following the second to last paragraph.
- #11 - Page 12, last paragraph, first sentence, the City of Moorpark is missing--"Calleguas Creek drains most of the southeastern part of Ventura County including the Cities of Thousand Oaks, Simi Valley, and Camarillo."
- #12 - All mountain and hill ranges must be included in the document.

- #13 - Page 9: To the paragraph about the Calleguas Creek Watershed hydrologic analysis add after after Ventura County Watershed Protection District the words "(formerly Ventura County Flood Control District)".
- #14 - Page 22 (the one between Pages 21 and 23), there should be spacing between the last paragraph for the City of Ojai information and the City of Oxnard (underlined).
- #15 - Pages 25-120, wherever VCFCFCD appears state "District" since some of the dates are pre-name change (Ventura County Flood Control District), and others are post-name change (Ventura County Watershed Protection District). I located the Ventura County Public Works Agency Watershed Protection District's April 2005 Final Calleguas Creek Watershed Hydrology Study Future Conditions with Project on the Internet and "District" is used in the document, though sometimes VCWPD is listed when the information is VCFCFCD related.
- #16 - Besides Table 2, include a "Table" for streams studied by detailed methods.
- #17 - Include a "Table" for streams studied by approximate methods under Section 2.
- #18 - Include a the word "All" or "Portion" in parenthesis after each listed flooding source and stream under Section 2.
- #19 - Include a list with the percentage breakdown for each developed area per the USGS report (Page 36).
- #20 - Include a list with the names and/or locations for the private levees that did not meet the FEMA specifications that were not considered in the hydraulic analysis (Page 26).
- #21 - Include a list with the names and/or locations for the private levees that did not meet the FEMA specifications, and that did not have adjacent improvements to benefit from (Page 26).

- #22 - The reader, and the public are expected to be knowledgeable about flood elevations references to North American Vertical Datum of 1988 (NAVD 88) and National Geodetic Vertical Datum of 1929 (NGVD 29) which "may result in differences in base flood elevations across the corporate limits between the communities" when reading the FEMA County of Ventura Preliminary FIS, and reviewing the Preliminary FIRMs. (Last Paragraph, Page 74)
- #23 - Not all barrancas had floodways computed.
- #24 - Not all canyons had floodways delineated.
- #25 - Why is a floodway "not applicable for areas of shallow flooding" (Page 82)?
- #26 - County and FEMA decided
- #27 - "Encroachment into areas subject to inundation by floodwaters having hazardous velocities aggravates the risk of flood damage, and heightens potential flood hazards by further increasing velocities...In order to reduce the risk of property damage in areas where the stream velocities are high, the community may wish to restrict development in areas outside the floodway." (Page 83, Second to Last Paragraph)
- The City of Simi Valley had in its General Plan Safety Element Update of 1992(?) such a statement similar to the aforementioned restriction, but development has instead been allowed throughout the community with the full knowledge of such dangerous hazards.
- #28 - Two different models were used for the Arroyo Simi in the City of Simi Valley reach of the Calleguas Creek Watershed area--for the main stem the LAUSACE HEC-1 model was used; for the upper reaches the values from the Ventura County Modified Rational Method were used.
- #29 - It is difficult to ascertain if both models were used for the middle reaches of the Arroyo Simi within the City of Simi Valley because the text

simply states "The two models produced similar results for the middle reaches of Arroyo Simi."  
(Page 42, Simi Valley)

- #30 - Include a separate page that states "EXHIBIT 1  
- FLOOD PROFILES.
- #31 - Give each Flood Profile page a number for ease of reference.
- #32 - Number the Table 6 pages--please note that counting these pages in the sequence order does end these pages at 109, so Page 111 may be off.
- #33 - "The scope and methods of study were proposed to, and agreed upon by, FEMA and Ventura County."  
(Page 10, Third Paragraph)
- #34 - The References are outdated.
- #35 - The FEMA County of Ventura Preliminary Flood Insurance Study(FIS) as written and formatted is not "user friendly".

#### CALLEGUAS CREEK WATERSHED HYDROLOGY STUDY(2005)

- #1 - Why is the "District" Modified Rational Method analysis not based on "infiltration tests"  
(Page 4, Second Paragraph)?
- #2 - Ventura County collector streets are "assumed to be 40-feet wide" "with eight-inch curbs"(Second Paragraph, Page 4).
- #3 - "Channel storage from routing point to routing point also is accounted for, treating each reach as if it were a reservoir"(3<sup>rd</sup> Paragraph, Page 4)?
- #4 - "The VCRAT computer program produces a 200-point runoff hydrograph for each sub-area, which it adds to the hydrograph of the next area downstream. In this way it accounts for changes in Times of Concentration between subareas." Is this a FEMA approved method? What other Southern California counties use this method(Page 4, Third Paragraph)?

- #5 - The "AREAL REDUCTION" depends on the District's Modified Rational Method's assumptions (Page 5, Last Paragraph).
- #6 - Under "MODELS APPLICATIONS", the planned land use information is based on each jurisdiction's General Plan. The City of Simi Valley's 1988 General Plan has not been updated (Page 5, Fourth Paragraph)!!!
- #7 - Were the Cities of Camarillo, Moorpark, Simi Valley, and Thousand Oaks aware that the hydrology report was going to analyze the the Calleguas Creek area into "two separate watersheds for modeling purposes"--Model 1 only the Calleguas Creek Watershed, and Model 2 the watershed and the Revolon Slough (Page 5, First Paragraph)--as well as use the document for the FEMA countywide Preliminary FIS and FIRMs?
- #8 - Is the appeal by the City of Moorpark, and possibly the City of Camarillo, due to the fact that the 2005 Final Hydrology Study analyzed the countywide study area using two methods: "with project" and "without project"--for FEMA purposes--(Page 2)?
- #9 - Were the Cities of Simi Valley, Thousand Oaks, Camarillo and Moorpark aware that this would be the case? If not, why not? If so, how can the Cities of Moorpark and Camarillo want future improvements to be factored into the FIRMs when Page 2 under Appendix 4 clearly states "FEMA's 2001 published report 'Modernizing FEMA's Flood Hazard Mapping - Recommendations for Using Future Conditions Hydrology for the National Flood Insurance Program' states '...the future hydrology conditions...are based on future land-use conditions of the watershed, and do not include future construction of flood detention structures or hydraulic structures.'"
- #10 - Were the 4 cities aware that "Due to the regional nature of this study, smaller local detention facilities, such as water quality basins and local detention facilities were not incorporated" (Page 2, Appendix 4)?

#11 - Did the Cities of Camarillo, Moorpark, Simi Valley, and Thousand Oaks receive copies of the Final hydrology study?

#12 - Did the Cities of Camarillo, Moorpark, Simi Valley, and Thousand Oaks know about the draft hydrology study? If so, when did each jurisdiction learn about the document?

Mr. Sedell, when will a written response to my January 26, 2006 questions--submitted to Ramona in the Public Works Department--be forwarded to me? Question 8 asked "What are the 'West Tributary' and 'East Tributary' referring to on Map #06111C0844E?" Question 5 asked "What does 'Sycamore Canyon' refer to on Map #06111C0843E; adjacent to Madera Road?" Question 4 asked "Are copies of the Calleguas Creek Watershed 200 Hydrology Report available through the City, or through the County, or FEMA? (For Purchase)"

Mr. Sedell, when Ramona gave me a copy of my submitted questions she mentioned that Ron would get a copy. Is this Ron the former Director of the City of Simi Valley Public Works Department (now the Director of the Ventura County Public Works Agency)? If so, why would he be getting a copy of my submittal when it is Supervisor Kathy Long that is the contact person for comments on the FEMA County of Ventura Preliminary FIS and Preliminary FIRMs?

Mr. Sedell, I ask that my letter on the 1997 City of Simi Valley's FIS and FIRMs, submitted to the City of Simi Valley, be referenced for my appeal of the current Preliminary FIS and Preliminary FIRMs.

Mr. Sedell, not only do I appeal the FEMA County of Ventura Preliminary Flood Insurance Study (FIS) and Preliminary Flood Insurance Rate Maps (FIRMs), I am also opposed to these documents.

Sincerely,

  
Teresa Jordan