

## Lenzi, Chelsea

---

**From:** Cori Hayman <corihayman@cox.net>  
**Sent:** Saturday, June 16, 2018 5:59 PM  
**To:** sbcob  
**Cc:** Williams, Das; Hartmann, Joan; Wolf, Janet; Lavagnino, Steve; Adam, Peter  
**Subject:** Board of Supervisors Hearing on June 19 re: FEMA Interim Advisory Flood Maps, File No. 18-00422  
**Attachments:** bos fema maps.pdf; ATT00001.txt

Dear Clerk of Board,

Please accept the following public comment in connection with the above-referenced matter.

Thank you,

Cori Hayman.

June 16, 2018

Santa Barbara County Board of Supervisors  
105 East Anapamu Street  
Santa Barbara, CA 93101

Re: FEMA Interim Advisory Flood Maps, File No. 18-00422

Dear Chair Williams and Members of the Board of Supervisors,

Attached to this letter is a list of questions and concerns compiled from meetings with the County and experts, as well as the community meeting on Thursday, regarding the accuracy of the FEMA Interim Advisory Flood Map "FEMA hazard map". Given the short time-frame since publication of the FEMA hazard map and this Board hearing, the Montecito Association Board has not been able to hold a meeting. This submission is therefore based on communications with individual Montecito Association Board members and community members.

Based on the attached concerns, it is respectfully requested that this Board continue this matter for 30-60 days and direct staff and FEMA to conduct field studies to verify the map's accuracy. Damaged and destroyed property owners may continue with the rebuilding process already in place under the March 13, 2018 guidance.

If the Board is inclined to act on the FEMA hazard map, and recognizing that many homeowners have been waiting for the FEMA hazard map to commence rebuilding, then it is respectfully requested to proceed with the procedure set forth by Michael Davenport. Mr. Davenport is COO and SVP for Rain/Hail with Chubb Insurance and a resident of Montecito. He is an expert in the interpretation and applicability of flood and other hazard maps. Mr. Davenport has stated repeatedly that these maps will be used for insurance purposes, notwithstanding the County's representations and disclaimers. His solution, as set forth in the attached document verbatim, is to limit the applicability of the FEMA hazard map to those parcels seeking to rebuild or to provisionally approve it with limitations while FEMA and the County conduct on the ground studies to verify the truth of the FEMA hazard map.

Finally, the Board should obtain clarity from staff as to the definition and intended purpose of the map. It is neither a debris flow nor a flood map. If it is a tool intended for rebuilding only, then its application should be limited to those parcels seeking to rebuild.

Thank you for your consideration.

Very truly yours,

Cori Hayman.

## QUESTIONS AND CONCERNS REGARDING ACCURACY AND RELIABILITY OF FEMA HAZARD MAP

(1) The FEMA hazard map is a clear water flood map with geologic input by hydrologists, geologists, and other experts to mimic debris flows. It is not a debris flow map; but, it is the best that FEMA has to provide. Debris flow expert, Tom Dunne, is very concerned about relying on this map for predicting debris flow behavior, because, this is **not** a debris flow map. The map is a tool, per Mr. Dunne and County Flood Control. The California geological survey maps are also a source that County Flood relies on in making flood control recommendations regarding rebuilding; but they have not been made publicly available. There is a sense that these geological survey maps may be more reliable than the FEMA hazard map. More information is needed.

(2) There are portions of Randall Road and the Romero Creek area where parcels are shown as having less than 6 inches of water, and thus not needing to add elevation or make other changes to rebuild (currently safe, in other words). On these same parcels, however, homes were destroyed. It makes no sense.<sup>1</sup>

---

<sup>1</sup> The details of the discrepancy in the East Mountain/Randall Road area prepared by Tom Bollay are preliminarily as follows: The 1/9 event destroyed 22 homes / cottages above E. Mountain Drive; the new FEMA Map show 19 homes / cottages with no risk (less than .5' of water depth), and 3 homes / cottages with less than significant risk (between .5 and 1.0' of water depth).

The 1/9 event destroyed 23 homes below E. Mountain Drive and above E. Valley Road and 13 additional homes with minor damage or those that were affected by the event; the new FEMA Map show 17 homes that were destroyed with no risk (less than .5' of water depth), 4 homes that were destroyed with less than significant risk (between .5 and 1.0' of water depth) and 2 homes that were destroyed with moderate risk (between 1' and 3' of water depth). of the 13 homes with minor damage or those that were affected 3 with no risk (less than .5' of water depth), 9 homes with less than significant risk (between .5 and 1.0' of water depth) and 1 homes with moderate risk (between 1' and 3' of water depth).

The 1/9 event destroyed 33 homes in the the Glen Oaks and E. Valley lane Neighborhoods; the new FEMA Map show 24 homes with no risk (less than .5' of water depth), and 9 homes with less than significant risk (between .5 and 1.0' of water depth).

Three Neighborhood destroyed totals;

72 homes / cottages destroyed, FEMA mapping indicates that 60 with no risk (less than .5' of water depth), 9 homes with less than significant risk (between .5 and 1.0' of water depth) and 3 homes with moderate risk (between 1 and 3' of water depth).

(3) The map assumes all bridges are blocked. The map also assumes that the San Ysidro bridge at East Mountain exists. It does not. Public Works will replace a structure at some point, but it will be much smaller, and possibly only pedestrian in nature. It will not be the same large vehicular bridge it was before. This is the area above Randall Road and Glen Oaks where the explosion occurred.

(4) The map is based on LIDAR data taken shortly after the debris flow. Thousands of tons of debris have been removed and the basins have been cleared. Topography has changed since even the date of the debris flow. Also, Tom Dunne described a laborious process to make the LIDAR data translate accurately to the maps where errors could reasonably occur.

(5) Flood Control mentioned that when initial maps were reviewed, they showed no water coming down in parts of Hot Springs/Olive Mill corridor. Given the obvious inaccuracy of this information, County flipped it back to FEMA and the FEMA hazard map ultimately contained flows coming down the corridor. How is this any different from what we are seeing on Randall Road and Romero Creek area?

(6) Tom Dunne suggested getting an extension of 30-60 days to conduct field tests to confirm topography. Michael Davenport, a senior executive with Chubb (more from him below), suggested the same thing.

(7) The Hazard Areas (in the "yellow boundary") are a bit arbitrary. The impact is that homes totally unaffected by the debris flow are in those boundaries and now have a decrease in property value and an insurance problem. Again, the topography needs to be checked by field surveys. Someone needs to check the analysis that went into the yellow boundary lines.

(8) The aerial photographs of the Miramar resort property are about 18-24 months old; thus calling into question the accuracy of the topography.

(9) FEMA representatives should be at the Board of Supervisors hearing to answer questions.

(10) Michael Davenport, COO and SVP of Rain/Hail with Chubb (also a former General Counsel) indicated that the map will be used for insurance purposes if approved by the Board. He suggested the following:

"On quick fixes, I would suggest that the board take the new hazard map and overlay the "damage map" posted on [readysbc.org](http://readysbc.org) which I believe includes all of the properties that need permits for repairs. Limit the new map "high hazard area" only the areas of overlap. Thus, all of the properties that were unaffected by the 1-9 event would be removed from the "high hazard" category and the focus would match the stated purpose of the map, which is informing rebuilding decisions.

Since this map is [s] totally discretionary, I do not see any issue with these adjustments.

The other more complicated fix would be to provisionally approve the map for the limited purpose guiding rebuilding with a requirement that a more in-depth study be undertaken of the map with people ground truthing the map by going out into each area designated as a high hazard and actually reviewing the topography. This would make obvious some of the problems with the map. The Board would need to set a short period for the review 30 to 60 days and limit the hazard area to only the areas that they clearly deem hazards. I do not think this is as good of a plan for a couple of reasons: 1) it would require more resources in time and effort to address, and 2) it would have the supervisors "bless" a map that is a terribly flawed tool.

As part of the "boots in the neighborhood" review, I would welcome the opportunity to walk our area with Supervisor Williams and Mr. Frye. I am confident this example would highlight the problems with the map as it exists.

I know whatever map the Board approves is going to be used for many purposes well beyond rebuilding by members of the public. I do not see these uses as "nefarious" as was suggested last night but rather the public simply relying on information the government has deemed reliable to make important decisions. Thus, at the end of the day, the county needs to adopt a map that is focused to the task at hand and minimizes unintended consequences."

(11) Finally, the homeowners rebuilding do not need the FEMA hazard map to continue with their efforts. The public comment by Mr. Galkin on behalf of his neighbors is simply lobbying to push rebuilding forward as expeditiously as possible. Homeowners may continue under the procedures in place under the March 13, 2018 guidelines. Flood Control has made clear that they are working hand-in-hand with Planning and Development on the current rebuilds.

**Lenzi, Chelsea**

---

**From:** Jay Lott <jaylott@yahoo.com>  
**Sent:** Friday, June 15, 2018 4:38 PM  
**To:** sbcob  
**Subject:** Please Adopt The Maps

Dear Board of Supervisor,

After learning of the recent news and your commitment to expedite like for like (thank you!), I urge you to adopt the maps and give the professionals within County Flood control the ability to approve plans that have been sitting in the cue now for several months. The FEMA maps have been produced on schedule as promised, they have been reviewed by teams of professionals, and they represent the best available information. If there are issues people have with the maps, County flood should deal with them on a case by case basis, but for my neighbors that agree with the data and need to rebuild, you cannot delay them building permits any longer, its been 6 months, they need their lives back.

Much appreciated,

Jay Lott

## Lenzi, Chelsea

---

**From:** Darlene Bierig <darbierig@gmail.com>  
**Sent:** Monday, June 18, 2018 12:50 PM  
**To:** sbcob  
**Subject:** Comment Letter - FEMA Interim Advisory Flood Maps, File No. 18-00422 on  
**Attachments:** Letter to Board of Supervisors regarding interim FEMA maps.docx

Please distribute the following letter asking the Board to delay approving FEMA's Interim Advisory Flood Maps, File No. 18-00422 on tomorrow's agenda.

Thank you,  
Darlene Bierig

June 18, 2018

Santa Barbara county Board of Supervisors  
105 East Anapamu Street  
Santa Barbara, CA 93101

Re: FEMA Interim Advisory Flood Maps, File No. 18-00422 on  
Board of Supervisor's Agenda of June 19, 2018

Dear Chair Williams and Members of the Board of Supervisors,

I have steadfastly supported all your efforts to expedite rebuilding efforts by victims of our community's destructive debris flows, including the recently adopted Like for Like Rebuilding Ordinance. Nevertheless, after studying the FEMA interim advisory flood maps, listening to staff's roll-out presentation of the maps last Thursday, and talking to individual staff members of our Flood Control Agency, I urge you not to adopt these maps at tomorrow's meeting. I have serious concerns about the accuracy of these hastily prepared documents and believe that more time is needed to insure their accuracy and to clearly define their purpose. These maps have significant safety and financial implications for our community and should be properly vetted before being adopted.

Recognizing that the maps were only released five business days ago, there have already been a number of anomalies identified; many of which were identified by people with compelling credentials and depth of knowledge. These concerns should be taken seriously and doing so will take time. I suggest that your Board continue the matter for at least thirty days in order to allow technical staff and FEMA the time they'll need to ensure accuracy of the model and maps rather than hastily adopting a questionable product.

Furthermore, I found the messaging behind the rollout of these maps both confusing and somewhat contradictory. According to staff, these maps are a tool to help mitigate 100 year flood risk given the post-fire/post-mudflow hydrologic and topographic realities of Montecito. This leads to a number of logical concerns:

1. The maps were developed from LIDAR data taken shortly after the January debris flow; therefore, they are already outdated since the topography has dramatically changed since that time. An enormous effort by various government agencies was undertaken to clear out our creeks, debris basins, and public right of ways. At the same time, the Montecito Bucket Brigade and private property owners worked diligently to clear or move debris and boulders from private property. Thousands of tons of debris have been removed or relocated since the base data was developed, therefore, the modeling and proposed mitigation is of suspect validity.
2. The death and devastation experienced on January 9 was due to the debris flows, yet these maps do not evaluate or suggest mitigation of debris risk. Instead, they



only assess “interim” flood risk. If adopted, their proposed use will result in significant permanent impact to the community; while only purporting to address an “interim” risk.

3. The shifting of risk, from one property to another, has not been addressed or properly analyzed. Montecito is primarily a fully developed community with pockets of damaged/destroyed homes. If single properties, or a small pocket of properties, are re-built at significantly higher elevations than existing neighboring and/or downstream properties whose base elevation haven’t changed, what is the effect on the existing properties?
4. These FEMA advisory flood maps are considered to be “interim” maps until the hillsides destroyed by the Thomas Fire re-vegetate. Even after re-vegetation, it would appear that the risk they model will remain as long as there continues to be the risk of another wildfire. Is the County proposing to adopt a *controlled burn ordinance* in order to minimize fuel loading and the future risk of similar fire-mudflow disasters?

In closing, please do not approve these maps until all legitimate questions and concerns are properly answered and technical fieldwork is undertaken to assure the accuracy of these maps; there is simply too much at stake to do otherwise.

Very truly yours,

Dr. Darlene Bierig