From:	RICHARD PLEWA
To:	Planning
Cc:	Frederick Amrine; Jeffrey Alexander; Christine Brummer; Marie Coppa; George Ferrell; Chris Hammond; Van Harrison; Joan Hellmann; Michael Hodges; Abbie Jacobs; A C Jayne; Susan Kaufmann; Paula Lantz; Ahndia Mansoori; Jim McCauley; Denise McCauley; Boyd Mckenna; Toni Michaels; Janice Milhem; dneeland@med.umich.edu; eneelands@gmail.com; Mitchell Newberry; Karen Pender; MichaelPender; Bill Roberts; Chris and Renuka; Ann Verhey-Henke; jack wallace; carolyn wallace; Mark Wishka; geziegler@att.net; OWS Board
Subject:	Key Concerns & Recommendations of Thirty-Five Old West Side Homeowners on Floodplain Ordinance for 10/20/20 Meeting of the Ann Arbor Planning Commission
Date:	Sunday, October 18, 2020 8:41:02 PM
Attachments:	Comments for 10.20.20 Planning Commission Meeting.pdf

This message was sent from outside of the City of Ann Arbor. Please do not click links, open attachments, or follow directions unless you recognize the source of this email and know the content is safe.

We would greatly appreciate it if Planning Department staff could confirm that this transmittal e-mail and the attached document with our comments and recommendations have been received and will be sent to Planning Commissioners in advance of their 10/20/2020 meeting. Thank you!

Dear Planning Commission Members,

As homeowners on the Old West Side, we appreciate that the Planning Commission and the City's Planning Department have created opportunities for us to learn about and better understand the proposed floodplain ordinance. The responses from Planning Department staff in connection with the workshop that was offered on Oct. 8 answered some of our important questions, but did not provide clear or reasonably supported answers to other key questions.

At this point - with a focus on existing structures in the floodplain - our three primary concerns are for a clear statement of exemption of historic structures, a definition of market value that does not undervalue properties, and a shorter period for accumulating expenses toward the Substantial Improvement threshold. The three specific recommendations are:

(1) Planning Commission should confirm with City staff during the public hearing and approval process that the **Exemption for Historic Structures to the Substantial Improvement and Substantial Damage Processes** will remain unaffected by the enactment of the ordinance. (The language of the proposed ordinance seems ambiguous on this point.)

(2) **The definition of the term 'Market Value'** in the proposed ordinance should be changed so that property owners who are applying for permits have the option of accepting the use of an adjusted tax assessment-based property value or of providing a fair market value appraisal conducted by a state-licensed appraiser. (The choice is offered to homeowners in the floodplain ordinances of many cities across the country).

(3) The City should establish a 5-year **Cumulative Substantial Improvement Standard** rather than the 10-year standard that City staff is proposing for purposes of aggregating the costs of all permitted improvements and repairs in its Substantial Improvement regulatory process.

We also provide comments on the outreach process as we have experienced it and the need for future homeowner education. The brief Appendix to the document provides information on a key section of a floodplain ordinance in Sarasota County, FL. The Sarasota example illustrates legislative language consistent with our recommendation to offer homeowners a choice between using an adjusted SEV valuation and submitting an independent appraisal for purposes of determining Market Value.

We believe our recommendations represent a win-win solution that achieves Ann Arbor's objectives while protecting the property interests of existing floodplain homeowners. Thank you for your efforts to assure that the proposed ordinance reasonably balances the interests of the City and of individual homeowners.

Old West Side Homeowners:

Frederick Amrine
Jeff Alexander
Christine Brummer
Marie Coppa
George Ferrell
William Graves
Chris Hammond
Van Harrison
Joan Hellman
Michael Hodges
Abigail Jacobs
Amelia C Jayne
Susan Kaufmann
Paula Lantz
Ahndia Mansoori
Denise McCauley
Jim McCauley
Boyd McKenna
Toni Michaels
Janice Milhem
Diane Neelands
Elaine Neelands
Mitchell Newberry
Karen Pender
Michael Pender
Richard Plewa
Bill Roberts
Renuka Uthappa
Ann Verhey-Henke
Ryan Verhey-Henke
Jack Wallace
Carolyn Wallace
Mark Wishka
Christopher Zemke
Glenn Ziegler