

From: Kitty B. Kahn

Sent: Monday, February 06, 2023 5:57 PM

To: Lenart, Brett <BLenart@a2gov.org>; Delacourt, Derek <DDelacourt@a2gov.org>; Dohoney Jr., Milton <MDohoney@a2gov.org>

Cc: Erica Briggs <ericafora2@gmail.com>; Cornell, Jenn <JCornell@a2gov.org>

Subject: Please reconsider your plans for 415 W. Washington

I am writing to encourage you to reconsider your plans for 415 W. Washington. There are several reasons why the proposed development would not be a good fit for that site, but I am writing about the floodplain aspect. As you know, climate change will have an effect on flooding. It is very important that the City considers this as plans are made.

In response to questions at a webinar regarding 415 W. Washington on October 22, 2021, Jerry Hancock, Ann Arbor Stormwater and Floodplain Program Coordinator, emailed the following statement:

"The currently proposed elevated residential structure, occupying the entire flood fringe, would meet the Michigan Building Codes and the City's Flood Management Overlay Zoning District. However, a comprehensive planning effort for a City owned parcel should not simply recommend what is allowed by the Building Code or City Code. The questions should be:

1. What is good planning for the future of the site?
2. What uses and development would contribute to the resiliency and sustainability of the City?
3. What type of uses and development would fit the goals of the City of Ann Arbor?

"The City participates in the National Flood Insurance Program's (NFIP) Community Rating System (CRS), a voluntary incentive program that recognizes and encourages community floodplain management activities that exceed the minimum NFIP requirements. As a result, flood insurance premium rates are discounted to reflect the reduced flood risk resulting from the community actions meeting the three goals of the CRS:

- 1.) Reduce flood damage to insurable property;
- 2.) Strengthen and support the insurance aspects of the NFIP; and
- 3.) Encourage a comprehensive approach to floodplain management.

"The City is currently at a Class #6, which results in a 20% discount on all flood insurance policies. The City's participation in the CRS is another reason we should be surpassing what is allowed by the building codes and take a comprehensive and holistic approach to floodplain management on this City owned site.

"Most of the 415 W. Washington St. site is in the floodplain of Allen Creek. The floodway portion is being recommended for open space and the future Treeline – Allen Creek Urban Trail. That is an ideal use of the floodway in this urban area. The remainder of the site is in the flood fringe portion of the floodplain.

"Proposing to develop the flood fringe (the area of the floodplain outside the floodway) either for public buildings or sale for private development would be counter to the mitigation strategies approved by City Council in our 2017 Ann Arbor Hazard Mitigation Plan.

- Mitigation Strategy #17 states "Protect and attain funding for natural features like green space and green infrastructure in the floodplain".
- Mitigation Strategy #18 states "Consider a program to encourage dedication of open space in the floodway and floodplain".
- Mitigation Strategy #39 states "Considering acquiring properties (particularly Repetitive Loss and Severe Repetitive Loss properties) for acquisition within the floodplain and floodway".

"Since the City already owns this flood fringe area it would be counter to the stated goals of the Hazard Mitigation Plan to plan for, or sell it for, a more intense development than currently exists on the site.

"The idea of planning for residential uses is not suitable from a floodplain management standpoint. While codes may allow residential uses in the flood fringe, building elevated residential structures in the flood fringe increases the responsibility and cost of City emergency services in responding to flood events, increases the risk of occupants being injured in a flood, and floodplain construction is more costly. The United States Department of Housing and Urban Development prohibits spending federal money for residential uses in the floodplain for these reasons. The City should also avoid facilitating residential uses in the floodplain.

"Since the City owns this floodplain property, there is an opportunity to positively exceed the building codes and plan a resilient use that mitigates the previous development impact and considers future flood conditions. The current proposal of a mixed-use building, that includes residential, and occupies the entire flood fringe is not a desirable outcome for the site.

"From a floodplain management standpoint, the maximum amount of development on this site should not have a footprint larger than the current buildings, should be elevated (as proposed), and should not have any residential use."

Please think about the City's Stormwater and Floodplain Program Coordinator's statement and do not go forward with this development. Thank you. -Peace, Kitty