

**From:** [vrcaruso@comcast.net](mailto:vrcaruso@comcast.net) [<mailto:vrcaruso@comcast.net>]

**Sent:** Tuesday, April 05, 2016 11:18 AM

**To:** Planning

**Subject:** Kingsley Condominiums; 615 South Main Street Apartment Building Plans

Planning Commission,

Comments regarding proposed developments in and around the Allen's Creek Floodplain and Floodway:

**Kingsley Condominiums:**

The Allen's Creek Watershed Group (ACWG.ORG) does not support this proposal to build housing in the floodplain and, parking in the floodway and over the Allen's Creek Pipe.

Building in this area is ill advised and would be best suited for a Greenway Park which would reduce the flood hazard for the neighborhood. Parking cars over the Allen's Creek Pipe in the floodway is dangerous and causes an increased flood hazard. Cars will obstruct flow in the floodway and limit access to the drain if emergency work needs to be on on the pipe.

I know some city officials like to talk about that base but what about the tax base of existing homes they may be facing more flood hazard because of poor development planning. This is known tax base we are putting at risk. Or the potential for harm placing homes in the floodplain. This site has a history of high water even in small rain events. The city should not be developing the floodplain or floodway with the level of uncertainty of the floodplain with the new potential predicted heavy rain fall events.

We have examples of developments in the floodway and floodplain that have consistent flood issues to the point where there are **YouTube videos** extolling the problems with Ann Arbor's planning for flooding in and around the floodplain.

We have many studies now that show increased flood hazard due to global warming that should not be ignored including those from the US EPA, the Union of Concerned Scientists and University of Michigan Pellston Labs which specifically state increase blood hazards for Michigan due to Global Warming's effects on Michigan.

We have **many examples of poor planning** in the floodplain and floodway. Some examples are the homeless shelter stopped because the original \$1M plan was shown to be in the floodway and Liberty Glendale neighborhood which experienced about \$½M city project to bulldoze a mature woodland and pipe the open creek. Both had adverse effects of poor planning and significant lost to the community which either did not help or increased flood hazard for the neighborhoods.

The March 15, 2012 Tornado storm dumped **5-6" of rain** on south west portions of Ann Arbor in about an hour causing major flooding and property loss. This was predicted to go straight over Ann Arbor but took a right hook to the south. This was an historic rain for the city. More of the same is predicted for SEM. **Warren MI** had a **500 year rain**, according to the Warren Mayor, on August 12, 2014 causing over \$2B in losses to the community in a storm that passed over Ann Arbor before hitting Warren with **5.2" of rainfall** in 13 hours.

The U of M in the last few years has developed parts of the **Athletic Campus** in the Allen's Creek watershed that now are shown to be in **the floodplain** with City of Ann Arbor **new flood modeling and flood data**, causing more unnecessary flood hazard for upstream residents and businesses affecting life, health, safety and property.

We support some on councils effort to have a watershed overlay planning process with watershed aware planning. The official **100 year rain** for Ann Arbor had **jumped dramatically in recent years** and is predicted to continue to rise with Global Warming's effects.

The city can reject proposals that can be shown to adversely affect residents and businesses life, health, safety and property.

**Ann Arbor does not** currently participate in the **Federal Community Rating System** (CRS) which should change.

"Any community that meets the minimum federal requirements (outlined in 44 CFR 60) is eligible to join the CRS. This voluntary system **financially benefits both the residents of communities** by providing **discounts on flood insurance** premiums and also the communities as a whole by promoting an uninterrupted, responsive floodplain." **Making the community safer.**

### **615 South Main Street Apartment Building:**

The Allen's Creek Watershed Group does not support this proposal to build due to flood hazard of the site.

This developer group made comments at the public community meeting that the floodplain map and floodplain comments of the ACWG were based on a map that was **not accurate**. Discussions with the floodplain manager the next day indicated that we **were correct**. We had the correct map and comments were relevant relating to that map. The developer group also made comments that the berm to the east of the site would provide protection from flooding. Discussion with floodplain manager also indicated that this was not correct as the the berm was not large enough or high enough to provide protection and was not relevant to flood hazard.

Two existing businesses on-site have complained of **multiple flooding occurrences at their businesses** which would affect the below ground parking which may cause flooding of cars parked in the below ground parking area. One business owner made comment to this effect at the public community meeting. I also made this known to the floodplain manager while discussing the accuracy of the map we brought to the meeting. This recent history of flooding on site needs to be taken seriously when planning for this site.

We had **3 flooding deaths** in recent years in Northern Ohio from residents trying to move cars out of flooding parking areas.

See the above comments on the increase flood hazard and poor planning for flood hazard we are experiencing.

More information about the ACWG can be found on the web site.

Thank you,

Vince Caruso  
Coordinating Member  
Allen's Creek Watershed Group (ACWG)  
ACWG.ORG  
[vpc@acwg.org](mailto:vpc@acwg.org) or [vrcaruso@comcast.net](mailto:vrcaruso@comcast.net)