From: Linda Berauer < lberauer@umich.edu Sent: Tuesday, September 01, 2020 5:36 PM

To: Planning < Planning@a2gov.org >

Subject: Floodplain Management Overlay District

Planning Commissioners:

The current proposed amendment to Chapter 55 of the UDC regarding a Floodplain Overlay Zoning District is insufficient for Ann Arbor as a community which prides itself on being forward thinking with regard to sustainability best practices.

Please heed the best practice for environmental sustainability and safety as recommended by our own Certified Floodplain Manager, Jerry Hancock, who has 30 years of experience in this area and has had leadership roles in state and national associations of Floodplain professionals:

https://youtu.be/3RiJh66zUX8

The above link will take you to the webinar held by the City Planning Dept on July 16 to answer questions about the proposed ordinance amendments. At the 50 minute mark of the recording, Brett Lenart asks for clarification about the competing interests of development vs sustainability as pertaining to the Floodplain. Mr. Hancock clearly states:

"As a Floodplain regulator, I wouldn't want to see development happen there (in the Flood Fringe)....I would want to go further as a Floodplain Manager, but there may be other interests there."

Brett Lenart (at the 1:15 mark) states: "There is lots of feedback that we should prohibit development in both the Floodway and Flood Fringe. That would be a perfectly valid policy decision. It would improve the functionality long term."

As proposed, the amendments strengthen the prohibition on new construction in the Floodway, but do little for the flood fringe. It prohibits construction of critical facilities and structures without foundations in the flood fringe, but allows construction that raises the lowest floor or floodproofing requirement from one foot above the 1% annual chance flood elevation to one foot above the .2% annual chance flood elevation.

The webinar and other documents provide a multitude of data that demonstrate the insufficiency of the current proposed amendments. The current FEMA maps and proposed ordinance changes may have been sufficient for 15 years ago, not for today and not for tomorrow, as they do not take into consideration climate change and the altering weather and precipitation patterns.

Please do the right thing for long-term environmental sustainability and safety, and recommend that Council strengthens the proposed ordinance change to prohibit all new construction in the entire Floodplain throughout the City - inclusive of both Floodway and Floodplain.

Thank you.

Linda Berauer

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