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**- M E M O R A N D U M -**

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**TO:** Alexis DiLeo, Planning and Development Services Unit

**FROM:** Jerry Hancock – Stormwater and Floodplain Programs Coordinator,  
Systems Planning Unit, Public Services Area

**DATE:** August 17, 2017

**SUBJECT:** 1140 Broadway Site Plan  
1140 Broadway St.  
Project Number SP17-009

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I have reviewed the revised site plan, dated 8-11-17, and provide the following comments for the petitioner:

**Floodplain Management**

1. MAJOR ISSUE – The plans indicate that Building A will have a below grade parking level. The Michigan Building Code does not allow below grade spaces in residential structures. The only way to accomplish this type of building would be to fill the site and obtain a Letter of Map Revision based on Fill (LOMR-F) from the Federal Emergency Management Agency (FEMA) to remove the area from the floodplain prior to the issuance of building permits. The building will have to be raised to have the lowest level at grade, and will have to have flood openings if the at grade level is any lower than the base flood elevation plus one foot.
2. MAJOR ISSUE – I have been informed by the Michigan Department of Environmental Quality (MDEQ) and FEMA that below building stormwater detention chambers are considered basement space and are not allowed in buildings (particularly residential) that have any portion of it in the floodplain. The proposed parking structure, that is attached to Building A, has a below grade detention basin that is formed by the foundation of the structure. As such, Building A as proposed would not be allowed. The building will have to be redesigned to be out of the floodplain or eliminate the below grade detention chamber.
3. The floodplain boundaries along Maiden Lane and Nielson Court are shown inaccurately throughout the plans. Sheet 11 indicates that the floodplain boundary in the areas beyond the property line are “per FEMA mapping”. For development purposes, floodplain boundaries are determined by the flood elevation, not the boundaries shown on the FEMA flood insurance rate map. The flood elevation along Maiden Lane and Nielson Court is above 769, while the plans show the flood boundary at a flood elevation of about 767. Section 1:4(19) of the Land Development Regulations requires the floodplain boundaries to be shown at least 50 feet beyond the property lines. Please adjust the floodplain boundaries, 50 feet beyond the property lines, to conform to the elevations shown on the flood profile found in the Flood Insurance Study for Washtenaw County.
4. Please provide notes and calculations to demonstrate that the required flood openings will be provided at the ground level floor of building B.

**City Green Streets Policy**

5. The proposed underground detention basin appears to only have one catch basin connected to it to collect runoff from the reconstructed areas of Broadway Street. Please provide additional catch basins to collect runoff from all reconstructed areas, or an equivalent area of Public Street.

Based on this review, the petition should **NOT** be scheduled for Planning Commission action until the items noted have been addressed.

NOTE: It is possible that additional issues related to floodplain management and the City’s Green Streets Policy could arise as the plans are revised to address the above comments.

*1140 Broadway Floodplain Review (4)*