



July 3, 2013

William Murphy
Atkins
3901 Calverton Boulevard
Calverton, MD 20705

Re: Preliminary FEMA Map Comments and Appeal – Nine Mile Village/Bredesen Park Area; City of Edina, MN

Dear Mr. Murphy:

The City of Edina is submitting this correspondence and supporting documentation to both comment on and appeal the information that appears on panels 344F and 363F of the Revised Hennepin County Preliminary Flood Insurance Rate Maps (FIRM) dated August 17, 2012. The City proposes that three items should be corrected on the preliminary FIRMs, as shown in Figures 1 and 2, and described in more detail below. Additional background data are also provided in Figure 3 and Tables 1 and 2. The floodway data table, Table 9 of the Preliminary Hennepin County FIS, is repeated in this appeal as Table 1 and is correct as published in the FIS. Table 2 of this appeal provides additional detail regarding flood elevations in this area based on XP-SWMM modeling results. Nodes Q, R, and S from the Flood Insurance Study (FIS), which correspond to model nodes EdCrk7h, EdCrk7g, and EdCrk7c, respectively, are highlighted in blue in both Table 1 and 2. The flood profile from the Preliminary Hennepin County FIS, repeated in this appeal as Figure 3, is also correct as published in the FIS.

Detailed information regarding the City's basis for recommending the three corrections to the FIRMs is provided below:

- I. **Placement of the Base Flood Elevation (BFE) lines** along Nine Mile Creek between Trunk Highway (T.H.) 62 and the second footpath upstream of T.H. 62
 - Model node EdCrk7d has a 100-year flood elevation of 857 M.S.L. (Table 2). This model node represents the upstream node of the footpath bridge over Nine Mile Creek (the second footpath upstream of T.H. 62). The BFE for 857 M.S.L. should be moved upstream from its current location to just upstream of the footpath on the FIRM, as shown on Figure 1.

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- The BFE of 857 M.S.L. currently shown on the preliminary FIRM upstream of T.H. 62 should be moved slightly downstream (so that it's located at the very upstream end of the culvert under TH 62) and changed to a BFE of 856 M.S.L., as shown in Figure 1.
2. **Elevations of the BFEs:** The BFE lines shown on portions of panels 344F and 363F (circled in yellow on Figures 1 and 2) should be labeled 856 M.S.L. instead of 857 M.S.L. so that they reflect the appropriate flood elevation associated with those locations in the XP-SWMM model, on Flood Profile 64P(i) in the FIS (Figure 3), and in the Floodway Data (Table 9 of the FIS and also shown in Table 1 of this letter).
- Model node EdCrk7 is a storage node located at the upstream end of the T.H. 62 culvert. The model shows this flood elevation as 856.1 M.S.L. (Table 2). This elevation is also shown in the profile in Figure 3.
 - Mud Lake is the large wetland area to the north and slightly to the east of the T.H. 62 culvert in Bredesen Park (located in Zone AE, out of the floodway, on panel 344F). Mud Lake is represented in the model as node MD_50. The model shows the flood elevation for this node as 856.1 M.S.L. (Table 2). The BFE currently shown as 857 M.S.L. along the north edge of Mud Lake on the FIRM should be changed to 856 M.S.L., as shown in Figure 1.
3. **Removal of a portion of the 100-year floodplain based on survey data:** The 100-year floodplain shown on the revised preliminary FIRM (panels 344F and 363F) in the Bredesen Park area has expanded to include Nine Mile Village (a residential development), located southeast of Bredesen Park and northwest of the intersection of T.H. 62 and Tracy Avenue (Figures 1 and 2).
- Currently, the expanded floodplain shown on the preliminary FIRM represents the potential for backwater from the North Fork of Nine Mile Creek to overtop a high point in the drainage ditch along the north side of T.H. 62 and flow easterly to the Nine Mile Village development (Figures 1 and 2). However, the two storage nodes directly upstream of the T.H. 62 culvert, model nodes EdCrk7 and MD_50, which are the source of this backwater, have 100-year elevations of 856.1 M.S.L. A Licensed Professional Engineer conducted a survey of this drainage ditch (attached) and determined the overflow elevation to be 856.5 M.S.L. (All elevations presented in the City's appeal use National Geodetic Vertical Datum of 1929 (NGVD29)). Based on this survey, the 100-year flood would not overtop the highest elevation in the drainage ditch. Therefore, the portion of the floodplain in the Nine Mile Village development should be removed from the floodplain, as shown in Figures 1, 2 and 4.

Regarding numbers 1 and 2 above, the City recognizes that the request for these map changes does not satisfy the data requirements defined in Title 44, Chapter 1, Part 67 of the Code of Federal Regulations, and will therefore be handled as comments. The City understands that if favorably resolved, these comments will change the information shown on the FIRM.

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Regarding number 3 above, the City would like to appeal the proposed floodplain delineation around the Nine Mile Village area because it is technically incorrect. Survey information is attached to provide “certification of correctness of any alternate data utilized or measurements made (such as topographic information) by a registered professional engineer” (*Title 44, Chapter 1, Part 67 of the Code of Federal Regulations, §67.6*).

To support the appeal of the floodplain delineation in the Nine Mile Village area, the following additional information is attached:

- Survey from a Licensed Professional Engineer showing the high point in the ditch as an elevation of 856.5 M.S.L. (**Hwy 62 Ditch Survey.pdf**).
- Figure 4 compares the preliminary floodplain on the FIRM (light blue) and the proposed floodplain delineation being recommended (dark blue hatching). Please note that the only change to the preliminary floodplain that is being recommended is the removal of the area in the Nine Mile Village development (which impacts both panels 344F and 363F).
- GIS shapefiles used to revise the floodplain as recommended in this appeal, including:
 - The extent of recommended 100-year floodplain, excluding the Nine Mile Village area
 - Survey points of the T.H. 62 ditch overflow from the Licensed Professional Engineer

All supporting documentation is available for download from the following FTP site:

- In Windows Explorer (“My Computer”, not the web browser Internet Explorer) type:
<ftp://user.barr.com>
- Press Enter
- Username: sms
- Password: ftpsms
- The documentation can be found under the folder “Edina-FEMA-Appeal” and then the subfolder “NineMileVillage”

Revising the FEMA FIRM to show the appropriate BFEs (and the appropriate placement of the BFEs), as well as removing the Nine Mile Village development from the floodplain, directly benefits concerned residents in this area. It is extremely important to the City that we provide the best available data to our residents to accurately identify flood risk. The City of Edina, as well as the City’s consulting engineer (Barr Engineering), welcome the opportunity to discuss any questions and/or concerns FEMA may have regarding this appeal and/or the supporting documentation that has been provided to support a change to the floodplain map.

The City recognizes that FEMA would like to finalize the Hennepin County maps as soon as possible; therefore, the City would appreciate notification of FEMA’s decisions regarding the three issues described above as soon as the

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decision is made (prior to the Letter of Final Determination) so that the City can be prepared to explain FEMA's decisions to residents and/or move forward in the appeal process, as deemed necessary, without unnecessary additional delay.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott H. Neal".

Scott Neal
City Manager, City of Edina

c: Wayne Houle, City Engineer, City of Edina
Janna Kieffer, Barr Engineering Company
Suzanne Jiwani, Minnesota Department of Natural Resources
Kevin Bigalke, Nine Mile Creek Watershed District