



Federal Emergency Management Agency

Washington, D.C. 20472

August 2, 2019

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

The Honorable David Dimmitt
Mayor, City of Brentwood
2348 S. Brentwood Boulevard
Brentwood, MO 63144

IN REPLY REFER TO:

Case No.: 19-07-0679R
Community Name: City of Brentwood, MO
Community No.: 290338

9489 0090 0027 6124 9035 68

Dear Mayor Dimmitt:

We are providing our comments with the enclosed Conditional Letter of Map Revision (CLOMR) on a proposed project within your community that, if constructed as proposed, could revise the effective Flood Insurance Study report and Flood Insurance Rate Map for your community.

If you have any questions regarding the floodplain management regulations for your community, the National Flood Insurance Program (NFIP) in general, or technical questions regarding this CLOMR, please contact the Director, Mitigation Division of the Federal Emergency Management Agency (FEMA) Regional Office in Kansas City, Missouri, at (816) 283-7003, or the FEMA Map Information eXchange (FMIX) toll free at 1-877-336-2627 (1-877-FEMA MAP). Additional information about the NFIP is available on our website at <http://www.fema.gov/nfip>.

Sincerely,

Patrick "Rick" F. Sacbibit, P.E., Branch Chief
Engineering Services Branch
Federal Insurance and Mitigation Administration

List of Enclosures:

Conditional Letter of Map Revision Comment Document

cc: Mr. Bola Akande, City Administrator
City of Brentwood

Mr. Marty Corcoran, City Manager
City of Maplewood

Ms. Jennifer Yackley, City Administrator
City of Rock Hill

Mr. Ron Brendel, Floodplain Administrator
City of St. Louis

The Honorable Sam Scherer, Mayor
City of Shrewsbury

Mr. Steve Wylie, City Manager
City of Webster Groves

Ms. Karen McHugh, CFM
Missouri State Emergency Management Agency

Mr. Phillip Blonn, P.E.
Jacobs Engineering Group, Inc.



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CONDITIONAL LETTER OF MAP REVISION COMMENT DOCUMENT

COMMUNITY INFORMATION		PROPOSED PROJECT DESCRIPTION	BASIS OF CONDITIONAL REQUEST
COMMUNITY	City of Brentwood St. Louis County Missouri	BRIDGE CHANNELIZATION DETENTION BASIN	BASE MAP CHANGES UPDATED TOPOGRAPHIC DATA HYDROLOGIC ANALYSIS HYDRAULIC ANALYSIS FLOODWAY
	COMMUNITY NO.: 290338		
IDENTIFIER	Deer Creek Flood Mitigation Project	APPROXIMATE LATITUDE & LONGITUDE: 38.609, -90.346 SOURCE: USGS QUADRANGLE DATUM: NAD 83	
AFFECTED MAP PANELS			
TYPE: FIRM*	NO.: 29189C0326K	DATE: February 4, 2015	* FIRM - Flood Insurance Rate Map
TYPE: FIRM	NO.: 29189C0327K	DATE: February 4, 2015	

FLOODING SOURCES AND REACH DESCRIPTION

See Page 2 for Additional Flooding Sources

Deer Creek – From the mouth at River Des Peres to approximately 400 feet downstream of McKnight Road

PROPOSED PROJECT DESCRIPTION

Flooding Source	Proposed Project	Location of Proposed Project
Deer Creek	New Bridge	About 30 feet downstream of existing Breckenridge Industrial Court
	Channelization	From just upstream of downstream-most railroad crossing to about 700 feet downstream of the railroad crossing near Mary Avenue
	New Detention Basin	About 200 feet downstream of railroad crossing near Mary Avenue

SUMMARY OF IMPACTS TO FLOOD HAZARD DATA

Flooding Source	Effective Flooding	Proposed Flooding	Increases	Decreases
Deer Creek	Zone AE	Zone AE	Yes	Yes
	BFEs*	BFEs	None	Yes
	Floodway	Floodway	Yes	Yes
	Zone X (shaded)	Zone X (shaded)	Yes	Yes

* BFEs - Base (1-percent-annual-chance) Flood Elevations

COMMENT

This document provides the Federal Emergency Management Agency's (FEMA's) comment regarding a request for a CLOMR for the project described above. This document is not a final determination; it only provides our comment on the proposed project in relation to the flood hazard information shown on the effective National Flood Insurance Program (NFIP) map. We reviewed the submitted data and the data used to prepare the effective flood hazard information for your community and determined that the proposed project meets the minimum floodplain management criteria of the NFIP. Your community is responsible for approving all floodplain development and for ensuring that all permits required by Federal or State/Commonwealth law have been received. State/Commonwealth, county, and community officials, based on their knowledge of local conditions and in the interest of safety, may set higher standards for construction in the Special Flood Hazard Area (SFHA), the area subject to inundation by the base flood. If the State/Commonwealth, county, or community has adopted more restrictive or comprehensive floodplain management criteria, these criteria take precedence over the minimum NFIP criteria.

This comment is based on the flood data presently available. If you have any questions about this document, please contact the FEMA Map Information eXchange (FMIX) toll free at 1-877-336-2627 (1-877-FEMA MAP) or by letter addressed to the LOMC Clearinghouse, 3601 Eisenhower Avenue, Suite 500, Alexandria, VA 22304-6426. Additional information about the NFIP is available on the FEMA website at <http://www.fema.gov/nfip>.

Patrick "Rick" F. Sacbbit, P.E., Branch Chief
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**CONDITIONAL LETTER OF MAP REVISION
COMMENT DOCUMENT (CONTINUED)**

COMMUNITY INFORMATION (CONTINUED)

ADDITIONAL FLOODING SOURCES AFFECTED BY THIS CONDITIONAL REQUEST

FLOODING SOURCES AND REACH DESCRIPTION

Black Creek – From the mouth at Deer Creek to approximately 850 feet upstream of Litzinger Road
 Hampton Branch - From the mouth at Black Creek to approximately 150 feet downstream of Laclede Forest Drive
 Shady Grove Creek - From mouth at Deer Creek to just downstream of Thornton Avenue

PROPOSED PROJECT DESCRIPTION

Flooding Source	Proposed Project	Location of Proposed Project
Black Creek	New Detention Basin	Approximately 600 feet upstream of the mouth at Deer Creek
Hampton Branch	No Project	
Shady Grove Creek	No Project	

SUMMARY OF IMPACTS TO FLOOD HAZARD DATA

Flooding Source	Effective Flooding	Proposed Flooding	Increases	Decreases
Black Creek	Zone AE	Zone AE	Yes	Yes
	BFEs	BFEs	None	Yes
	Floodway	Floodway	Yes	Yes
	Zone X (shaded)	Zone X (shaded)	None	Yes
Hampton Branch	Zone AE	Zone AE	Yes	Yes
	BFEs	BFEs	None	Yes
	Floodway	Floodway	Yes	Yes
	Zone X (shaded)	Zone X (shaded)	Yes	Yes
Shady Grove Creek	Zone AE	Zone AE	None	Yes
	BFEs	BFEs	None	Yes
	Zone X (shaded)	Zone X (shaded)	None	Yes

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CONDITIONAL LETTER OF MAP REVISION COMMENT DOCUMENT (CONTINUED)

OTHER COMMUNITIES AFFECTED BY THIS CONDITIONAL REQUEST

CID Number: 295266 **Name:** City of Maplewood, Missouri

AFFECTED MAP PANELS

TYPE: FIRM NO.: 29189C0327K DATE: February 4, 2015

CID Number: 290382 **Name:** City of Rock Hill, Missouri

AFFECTED MAP PANELS

TYPE: FIRM NO.: 29189C0326K DATE: February 4, 2015

CID Number: 290386 **Name:** City of Shrewsbury, Missouri

AFFECTED MAP PANELS

TYPE: FIRM NO.: 29189C0327K DATE: February 4, 2015

CID Number: 290394 **Name:** City of Webster Groves, Missouri

AFFECTED MAP PANELS

TYPE: FIRM NO.: 29189C0326K DATE: February 4, 2015

TYPE: FIRM NO.: 29189C0327K DATE: February 4, 2015

CID Number: 290385 **Name:** City of St. Louis, Missouri

AFFECTED MAP PANELS

TYPE: FIRM* NO.: 2903850077C DATE: May 24, 2011

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CONDITIONAL LETTER OF MAP REVISION COMMENT DOCUMENT (CONTINUED)

COMMUNITY INFORMATION

To determine the changes in flood hazards that will be caused by the proposed project, we compared the hydraulic modeling reflecting the proposed project (referred to as the proposed conditions model) to the hydraulic modeling used to prepare the Flood Insurance Study (FIS) (referred to as the effective model). If the effective model does not provide enough detail to evaluate the effects of the proposed project, an existing conditions model must be developed to provide this detail. This existing conditions model is then compared to the effective model and the proposed conditions model to differentiate the increases or decreases in flood hazards caused by more detailed modeling from the increases or decreases in flood hazards that will be caused by the proposed project.

The table below shows the changes in the BFEs:

BFE Comparison Table

Flooding Source: Deer Creek		BFE Change (feet)	Location of maximum change
Existing vs. Effective	Maximum increase	0.0	n/a
	Maximum decrease	6.4	Approximately 100 feet upstream of Big Bend Boulevard
Proposed vs. Existing	Maximum increase	0.2	Just downstream of Big Bend Boulevard
	Maximum decrease	3.8	Approximately 50 feet downstream of railroad bridge near Mary Avenue
Proposed vs. Effective	Maximum increase	0.0	n/a
	Maximum decrease	7.4	Approximately 100 feet upstream of Big Bend Boulevard
Flooding Source: Black Creek		BFE Change (feet)	Location of maximum change
Existing vs. Effective	Maximum increase	0.0	n/a
	Maximum decrease	3.8	Approximately 500 feet upstream of the mouth at Deer Creek
Proposed vs. Existing	Maximum increase	0.0	n/a
	Maximum decrease	1.0	Approximately 50 feet upstream of Manchester Road
Proposed vs. Effective	Maximum increase	0.0	n/a
	Maximum decrease	4.8	Approximately 500 feet upstream of the mouth at Deer Creek
Flooding Source: Hampton Branch		BFE Change (feet)	Location of maximum change
Existing vs. Effective	Maximum increase	0.0	n/a
	Maximum decrease	3.4	Approximately 80 feet upstream of Hanley Road
Proposed vs. Existing	Maximum increase	0.0	n/a
	Maximum decrease	1.0	Approximately 80 feet upstream of the mouth at Black Creek
Proposed vs. Effective	Maximum increase	0.0	n/a
	Maximum decrease	4.3	Approximately 80 feet upstream of Hanley Road

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CONDITIONAL LETTER OF MAP REVISION COMMENT DOCUMENT (CONTINUED)

COMMUNITY INFORMATION (CONTINUED)

BFE Comparison Table (continued)

Flooding Source: Shady Grove Creek		BFE Change (feet)	Location of maximum change
Existing vs. Effective	Maximum increase	0.0	n/a
	Maximum decrease	2.0	Just downstream of Thornton Avenue
Proposed vs. Existing	Maximum increase	0.0	n/a
	Maximum decrease	1.3	Just downstream of Thornton Avenue
Proposed vs. Effective	Maximum increase	0.0	n/a
	Maximum decrease	3.1	Just downstream of Thornton Avenue

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**CONDITIONAL LETTER OF MAP REVISION
COMMENT DOCUMENT (CONTINUED)**

COMMUNITY INFORMATION (CONTINUED)

Increases due to the proposed project that exceed those permitted under Paragraphs (c)(10) or (d)(3) of Section 60.3 of the NFIP regulations must adhere to Section 65.12 of the NFIP regulations. With this request, your community has complied with all requirements of Paragraph 65.12(a) of the NFIP regulations. Compliance with Paragraph 65.12(b) also is necessary before FEMA can issue a Letter of Map Revision when a community proposes to permit encroachments into the effective regulatory floodway that will cause BFE increases in excess of those permitted under Paragraph 60.3(d)(3).

NFIP regulations Subparagraph 60.3(b)(7) requires communities to ensure that the flood-carrying capacity within the altered or relocated portion of any watercourse is maintained. This provision is incorporated into your community's existing floodplain management ordinances; therefore, responsibility for maintenance of the altered or relocated watercourse, including any related appurtenances such as bridges, culverts, and other drainage structures, rests with your community. We may request that your community submit a description and schedule of maintenance activities necessary to ensure this requirement.

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CONDITIONAL LETTER OF MAP REVISION COMMENT DOCUMENT (CONTINUED)

COMMUNITY INFORMATION (CONTINUED)

Upon completion of the project, your community must submit the data listed below and request that we make a final determination on revising the effective FIRM and FIS report. If the project is built as proposed and the data below are received, a revision to the FIRM and FIS report would be warranted.

- Form 1, entitled "Overview & Concurrence Form". Detailed application and certification forms must be used for requesting final revisions to the maps. Therefore, when the map revision request for the area covered by this letter is submitted, Form 1 must be included. If as-built conditions differ from the proposed plans, please submit new forms, which may be accessed at http://www.fema.gov/plan/prevent/fhm/dl_mt-2.shtm, or annotated copies of the previously submitted forms showing the revised information.
- Form 2, entitled "Riverine Hydrology & Hydraulics Form"
- Form 3, entitled "Riverine Structures Form"
- Hydraulic analyses, for as-built conditions, of the base flood; the 10-percent, 2-percent, and 0.2 percent annual chance floods; and the regulatory floodway, together with a topographic work map showing the revised floodplain and floodway boundaries. Please ensure that the revised information ties in with the current effective information at the downstream and upstream ends of the revised reach.
- Annotated copies of the FIRMs, at the scale of the effective FIRMs, that show the revised floodplain and floodway boundary delineations shown on the submitted work map and how they tie into the floodplain and floodway boundary delineations shown on the current effective FIRMs at the downstream and upstream ends of the revised reach
- As-built plans, certified by a registered professional engineer, of all proposed project elements
- Evidence that your community has, prior to approval of the proposed encroachment, adopted floodplain management ordinances that incorporate the increased BFEs and revised floodway boundary delineations to reflect the post-project conditions, as stated in Paragraph 65.12(b)
- Documentation of the individual legal notices sent to property owners who will be affected by any widening/shifting of the base floodplain and/or any BFE increases.

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CONDITIONAL LETTER OF MAP REVISION COMMENT DOCUMENT (CONTINUED)

COMMUNITY INFORMATION (CONTINUED)

- A letter stating that your community will adopt and enforce the modified regulatory floodway, OR, if the State/Commonwealth has jurisdiction over either the regulatory floodway or its adoption by your community, a copy of your community's letter to the appropriate State/Commonwealth agency notifying it of the modification to the regulatory floodway and a copy of the letter from that agency stating its approval of the modification
- An officially adopted maintenance and operation plan for the detention basins. This plan, which may be in the form of a written statement from the community Chief Executive Officer, an ordinance, or other legislation, must describe the nature of the maintenance activities, the frequency with which they will be performed, and the title of the local community official who will be responsible for ensuring that the maintenance activities are accomplished.
- FEMA's fee schedule for reviewing and processing requests for conditional and final modifications to published flood information and maps may be accessed at http://www.fema.gov/plan/prevent/fhm/frm_fees.shtm. The fee at the time of the map revision submittal must be received before we can begin processing the request. Payment of this fee can be made through a check or money order, made payable in U.S. funds to the National Flood Insurance Program, or by credit card (Visa or MasterCard only). Please forward the payment, along with the revision application, to the following address:

LOMC Clearinghouse
3601 Eisenhower Avenue, Suite 500
Alexandria, VA 22304-6426

After receiving appropriate documentation to show that the project has been completed, FEMA will initiate a revision to the FIRM and FIS report. Because the flood hazard information (i.e., base flood elevations, base flood depths, SFHAs, zone designations, and/or regulatory floodways) will change as a result of the project, a 90-day appeal period will be initiated for the revision, during which community officials and interested persons may appeal the revised flood hazard information based on scientific or technical data.

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**CONDITIONAL LETTER OF MAP REVISION
COMMENT DOCUMENT (CONTINUED)**

COMMUNITY INFORMATION (CONTINUED)

We have designated a Consultation Coordination Officer (CCO) to assist your community. The CCO will be the primary liaison between your community and FEMA. For information regarding your CCO, please contact:

Mr. Michael R. Scott
Director, Mitigation Division
Federal Emergency Management Agency, Region VII
9221 Ward Parkway, Suite 300
Kansas City, MO 64114-3372
(816) 283-7003

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