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December 22, 2015

Deborah M. Bullwinkel  
Village President, Village of Villa Park  
20 South Ardmore Avenue  
Villa Park, Illinois 60181

Community: Village of Villa Park,  
DuPage County, Illinois  
Community No.: 170217

Dear Ms. Bullwinkel:

This letter acknowledges receipt of letters received during the comment period for the Preliminary Flood Insurance Rate Map (FIRM) and Flood Insurance Study (FIS) report for DuPage County, Illinois and Incorporated Areas, dated June 3, 2015.

Mr. Vydas Juskelis, Public Works Director submitted the following comments on behalf of your community.

1. Sugar Creek Golf Course, PIN 06-15-200-062 and 06-15-200-051 (Golf Course Comment), Preliminary panel 17043C0177J. Floodway expands significantly to the south, just west of Walmart parking lot. With respect to the floodway mapping, it is our understanding that in DuPage County, floodways are determined based on conveyance and are exempt from the State's velocity and volume criteria because the County has an ordinance that requires mitigation of all floodplain fill. Having said that, the revised floodway on the golf course just upstream of the Walmart parking lot appears to extend into non conveyance portions of the floodplain. See exhibit. See also comments submitted by DuPage Mayors and Managers Conference.
2. 933 South Villa Avenue, PIN 06-15-201-041 (Julia Comment), Preliminary panels 17043C0176J and Preliminary panel 17043C0177J. Floodway boundary at Julia and Villa expands to include residential structure locate at 933 South Villa Avenue, making a 90 degree bend. With respect to the floodway mapping, it is our understanding that in DuPage County, floodways are determined based on conveyance and are exempt from the State's velocity and volume criteria because the County has an ordinance that requires mitigation of all floodplain fill. The revised floodway appears to extend into non-conveyance portions of the floodplain. See exhibit. See also comments submitted by DuPage Mayors and Managers Conference.
3. Ovaltine Court Apartment Complex, 1 East Ovaltine Court, PIN 06-10-212-018 (Ovaltine Comment), Preliminary panel 17043C0089J. Stormwater detention pond at Ovaltine Apartment Complex is mapped Zone AE. Based on past discussions with the County, it was the Village's understanding that the revised maps were going to exclude detention facilities unless they are

online basins. Additionally, a series of back flow preventer devices were installed as part of the development to isolate the detention pond. The detention facility was sized for the tributary area of 13.65 acres. See exhibit.

4. 303 East Terry Lane, PIN 06-15-118-014; 305 East Terry Lane, PIN 06-15-118-015 (Terry Comment) Preliminary panel 17043C0176J. Floodway at Villa and Terry goes through the houses at 303 and 305 East Terry Lane. Floodway boundary expands to the north and then makes almost 90 degree bend to the east. With respect to the floodway mapping, it is our understanding that in DuPage County, floodways are determined based on conveyance and are exempt from the State's velocity and volume criteria because the County has an ordinance that requires mitigation of all floodplain fill. We believe it was not necessary to expand floodway to include residential structures. See exhibit. See also comments submitted by DuPage Mayors and Managers Conference.
5. Walmart, 900 South IL Route 83, PIN 06-15-201-040 (Walmart Comment), Preliminary panel 17043C0177J. Stormwater detention pond for Walmart site is mapped Zone A. Based on past discussions with the County, it was the Village's understanding that the revised maps were going to eliminate Zone A floodplain areas historically associated with detention facilities, backwater areas, isolated and/or shallow localized flooding areas, etc. (it was actually discussed that detention facilities should not be mapped floodplain unless they are online basins). The presence of Zone A floodplain areas introduces more uncertainty and subsequent analysis as part of the permitting process associated with development, re-development, drainage improvements, and/or maintenance in these areas. There is approximately 13.08 acres that are tributary to the detention facility. See exhibit. See also comments submitted by DuPage Mayors and Managers Conference.
6. Willowbrook High School, 1250 South Ardmore Avenue, PIN 06-16-401-054, Preliminary panel 17043C0176J. In 2008 2009 DuPage High School District 88 permitted and constructed site improvements to the Willowbrook High School Campus located at 1250 S. Ardmore Avenue within Villa Park, Illinois. The improvements included a building addition (new field house) and associated on-line detention and compensatory storage. Prior to constructing the improvements, the District obtained a LOMR from FEMA (June 2009) to better define the floodplain and floodway on the subject property and to show that the proposed improvements were outside the regulatory floodway. In late 2011 / early 2012, the District's engineer provided the FEQ modeling associated with the improvements to DuPage County and was assured that the modeling was incorporated into the Sugar Creek re-study FEQ modeling. Additionally, as-built information was provided to the County. The regulatory floodplain elevation at the time of the improvements was approx. 687 and the finished floor of the addition was designed and constructed at an elevation of 689.3, more than 2 feet above the BFE. That said, the preliminary maps don't reflect the construction of the building addition and as a result, the preliminary mapped floodplain covers the majority of the building. Additionally, the preliminary mapped floodway also encroaches into the southwest corner of the building addition even though building was designed to stay outside the regulatory floodway and is currently more than 2 feet above the BFE based on elevation. We believe the best available data, specifically the as-built information associated with the building addition, was not incorporated into the draft preliminary FIRM. Furthermore, the latest aerial photography, which shows the building addition, and LIDAR data was not incorporated (the Village submitted aerial photography and LIDAR data from 2014). The Village also questions why the floodway shown on the preliminary

maps expanded dramatically in the western portion of the site (through the online detention area) and the southern parking lot, which has irregular shaped floodway, that does not appear to be consistent with a conveyance based floodway computations. See exhibit. (See also comments submitted by DuPage Mayors and Managers Conference dated August 12, 2015.)

7. Van Buren Comment, Preliminary panel 17043C0176J. Area between Jackson and Van Buren, Summit and Cornell was removed from SMA in DuPage County March 2015 map iteration, but re-appeared on the preliminary FIRM by FEMA. We have submitted 2014 aerial photography and LIDAR data to the County, but feel that the best available data was not used during the re-mapping process. See exhibit. See also comments submitted by DuPage Mayors and Managers Conference.
8. FIS Comment, Volume 1, Page 10, Table 4. Village of Villa Park is misspelled as Village of Villa Grove (Table 4).

Mr. Brad Acheson, Senior GIS Analyst, submitted the following on behalf of DuPage County Stormwater Management.

1. A statement that DuPage County plans to revisit the floodway of Sugar Creek (SCSU), Preliminary panel 17043C0176J with their consultant.
2. A statement that DuPage County plans to revisit the floodway of unnamed flooding sources in the Salt Creek Mainstem Watershed, Preliminary panels 17043C0086J and 17043C0087J with their consultant. The county believes the floodways are unrealistically wide.
3. A statement that DuPage County will redelineate the floodplains of Salt Creek (SCSC) and Sugar Creek (SCSU) on Preliminary panel 17043C0177J using updated site topography.

Several citizen comments objecting to the proposed Special Flood Hazard Areas within the Village of Villa Park were also received. These comments are being provided for your records.

1. How am I supposed to pay \$3051/year for flood insurance? With Biggert-Waters going into effect this is going to increase 18% a year until it reaches the "non-subsidized" rate. Does the state want me to go into foreclosure? Do they want my property to turn into some kind of marsh or nature area? Nobody at FEMA, my village or anyone else including my congressman will help me. I don't understand why I am being forced out of my home because I can no longer pay for flood insurance. By the way, I have been here for 21 years and have never taken on so much as one drop of water. I'm sure writing to you will accomplish nothing, as a guy at FEMA told me off the record, "It's not in our interest to help you. Why would we give up your money?" - Mark Ingwersen, 8/3/15
2. We have resided in our current residence for 24 years. We obtained a Letter of Map Amendment (LOMA) in 2002 thereby proving the inconsistencies and discrepancies in the current 100 year flood map. Due to the new remapping process, my LOMA will now be superseded. In my area, we have not experienced flooding concerns. This appears to be a monetary issue, primarily to benefit FEMA (NFIP) at the unnecessary expense to us. It is projected that in our area it is subject to an elevation increase of 12 ". How has this action been substantiated? With improvements that have been made, elevation levels should be lowered. This action will have detrimental effects on

property values, market values, and sale of homes. This action would also require the purchasing of a flood insurance policy which is very expensive and virtually useless. This action is unwarranted and unsubstantiated, and appears to be all about "MONEY". This needs to be reevaluated and reconsidered with some common sense thinking. LOMA 03-05-0385A - David L. Whitaker, 8/14/15

3. We purchased our home in 1998 and were told we needed flood insurance or we could not get a loan. We complied and several years later, has a survey taken only to find out that we were above the elevation level and flood insurance was not required. We basically paid \$10,000 for flood insurance that we DID NOT need. We secured a LOMA in 2007, which is still in force. Now FEMA/DuPage County decides to redo the maps tossing us back into a flood plain situation where the elevation is being raised to void our LOMA. Actually, we have been told the elevation level is being raised 12" which to us and the Village of Villa Park has not been justified. We have not flooded as long as we have lived in this house. We also did not flood in the storms in 2008 and 2010 which were noted as being the 2nd and 3rd biggest 2 day rainfall in 140 years. We have been told that because of the sewer improvements in our area, the elevation level should be going down. According to my LOMA the lowest elevation is 669.2 and the new level might be 669.5. REALLY \_\_0.3" \_\_REALLY? We even purchased a generator and a back-up sump to prevent any flood issues. The most recent 8+" rain storm that hit the Village did not cause any flooding in our area. I think that it is rather ironic that FEMA doesn't tell people that they are not in the flood plain requiring flood insurance, but sure as heck can just raise elevations, tossing residents back into being required to purchase flood insurance and void LOMA's. I believe FEMA/DuPage County needs to work with the Village to see what can be done to review these maps and advise what action can be taken to avoid causing property value issues and financial hardships. With all the confusion over these maps and the method used in the redrawing process, and more confusion over what FEMA said about the flood insurance versus what the writers of flood insurance policies are telling residents, this whole thing has turned into MASS CONFUSION. If there was any intent to benefit the residents by doing this remapping, with all the aftermath confusion of both the meeting in Wheaton on July 29th and the Villa Park meeting on August 10th- the residents see no benefit. They feel that they're getting screwed by the government. In fact, a petition has been circulating which could have some legal ramifications for both FEMA/DuPage County and the Village of Villa Park. - Donald Voight, 8/20/15
4. We have resided in our current residence for 28 years. We obtained a Letter of Amendment (LOMA) in 2005 proving the inconsistencies and discrepancies in the current 100 yr flood map. Due to the new remapping process, my LOMA will be superseded. In my area, we have not experienced flooding concerns. This appears to be a monetary issue. Primarily to benefit FEMA (N.F.I.P.) and not the homeowner. It is projected that in our area it is subjected to an elevation increase. How has this action been substantiated? My home according to the map has changed by 0.16 according to my LOMA. I also have been advised the new map was actually done in 2006. With improvements that have been made over the last 9 years it should have been lowered. This action will have detrimental effects on property value, market values, and sales of homes. This action would also require the purchasing of a flood insurance policy which is very expensive and virtually useless for me as I don't flood in my home. This remapping is based on old data and old maps and is unwarranted and unsubstantiated and appears to be all about the homeowner paying a

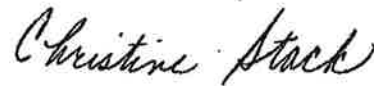
lot of unnecessary money to make other businesses rich. Please reevaluate and reconsider with current data not old data. LOMA 05-05-3563A - Bob and Pam Altman, 8/20/15

5. This letter is in response to the "Preliminary Summary of Map Actions" community: Villa Park, Village of Community No: 170217 that was provided to me by the Village of Villa Park. This paper work states that my property's Letter of Map Amendment (LOMA) will be "superseded" when the new FIRM becomes effective. It is of my opinion as well as those of others that this should not be the case. I reviewed the map both physically and on the computer screen at the DuPage County meeting July 29th 2015 and the Village of Villa Park meeting August 10th 2015. It is very apparent that while a portion of my property is possibly in the 100 year flood plain my primary residence "structure" is not. While there was a noticeable difference in the 100 year flood plain boundaries between the current map and the proposed map at no time/point does my "structure/Residence" fall within the said boundaries. Based on these findings I am requesting you review and reverse your decision to "Superseded" my properties LOMA. I feel that my LOMA should be categorized as "Not Incorporate". In closing I would like to state that if my LOMA is "superseded" and I am required to buy a flood insurance policy we will incur extreme financial hardship and quit possible lose our family home. Which by the way has never once flooded in the 10 years we have lived here. LOMA 05-05-5437A - Eric & Kelli Gustafson, 8/23/15
  
6. In 2008-2009 DuPage High School District 88 (D88) permitted and constructed major site improvements to their Willowbrook High School campus located at 1250 S. Ardmore Avenue within Villa Park, Illinois. At the 7/29/2015 DuPage County open house meeting this site on FIRM panel No. 17043C0176J was marked as number 92. The improvements consisted of a building addition (new field house) to their southwest building corner and re-grading of their northwest area for on-line detention and compensatory storage. Prior to the design of the improvements, D88 obtained a LOMR from FEMA (June 2009) to better define the floodplain and floodway on this parcel and to show that the proposed improvements were outside the regulatory floodway limits. In late 2011 / early 2012, D88's engineers provided FEQ modeling of the improvement to DuPage County for incorporation into the County's Sugar Creek re-study FEQ modeling. Additionally, as-built information was provided to the County. The regulatory floodplain elevation at the time of the improvements was approximately 687. The finished floor of the field house addition was set at 689.3; more than two feet above the BFE. The preliminary FIRM maps do not reflect the constructed field house addition and as a result, the mapped floodplain covers the addition. Additionally, the preliminary mapped floodway encroaches into the southwest corner of the addition though the addition was designed in location and elevation to be outside the floodway. We are inquiring if the as-built information (including the addition) was incorporated into the preliminary FIRM. We are also questioning why the preliminary mapped floodway dramatically expanded throughout the site and why the floodway limit has an irregular shape that does not appear to be consistent with a conveyance based on floodway computations. Furthermore, we believe that the latest aerial photography and LIDAR data (which shows the building addition) that the Village provided in 2014 was not incorporated. Please see the attached exhibits indicating the areas of question on this parcel. Please also see comments submitted by DuPage Mayors and Managers Conference dated August 12, 2015. See exhibits. See marked panel # 92 from open house. - Kyle Buck, PE, Project Manager, Wight & Company, 8/26/15

Please note that the Department of Homeland Security's Federal Emergency Management Agency (FEMA) considers appeals as only those submittals that relate to the addition or modification of flood hazard information (i.e., Base Flood Elevations, base flood depths, Special Flood Hazard Area boundaries, zone designations, or regulatory floodways) and that satisfy the data requirements defined in Title 44, Chapter I, Part 67 of the Code of Federal Regulations. Because the submittals were received during the 30 day comment period FEMA will refer to them as 'comments'.

FEMA will evaluate the issues raised in the referenced letters and the submitted data. If additional data or information are required to resolve the comments, FEMA will contact your community. If you have additional questions, please contact William Heyse of our FEMA staff in Chicago, either by telephone at (312) 408-5323 or by e-mail at William.Heyse@fema.dhs.gov. You may also contact Shelly Fuller of the Illinois State Water Survey at (217) 300-0221 or by e-mail at mfuller@illinois.edu.

Sincerely,



Christine Stack  
Director, Mitigation Division  
FEMA Region V

cc: Vydas Juskelis, P.E., Director of Public Works, Village of Villa Park  
Vassili Voskresenski, Civil Engineer, Village of Villa Park  
Mark Ingwersen  
David L. Whitaker  
Donald Voight  
Bob and Pam Altman  
Eric and Kelli Gustafson  
Kyle Buck, PE, Project Manager, Wight & Company  
Brad Acheson, Senior GIS Analyst, DuPage County Stormwater Management  
Christine Klepp, Senior Project Engineer, DuPage County Stormwater Management  
Paul Osman, State NFIP Coordinator, Illinois Department of Natural Resources