

# U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT:

## 8-STEP PROCESS

### Case Study San Carlos Park, Florida

--San Carlos Park CDBG-DR Project (Grant No. IR014)

--Decision Process Provided by 24 CFR §55.20

#### **Step 1: *Determine whether the action is located in a 100-year floodplain (or a 500-year floodplain for critical actions) or wetland.***

This action is located in a 100-year floodplain. Two of the proposed project sites are located within AE Zone (area of special flood hazard with water surface elevations determined) and the other project site is located in an X Zone (area outside of the special flood hazard area and not in the 500-year floodplain zone), as indicated on Flood Insurance Rate Map (FIRM) Floodplain layers on the project maps. The FIRM maps are attached to this document. The project site locations are not considered to be a wetland, as shown on the Fish and Wildlife Service- National Wetlands Inventory (NWI) map.

This project is (a) replacement of damaged sidewalks, (b) drainage system improvements, and (c) vegetation removal from canals. This project is in a floodway and therefore requires an 8-step analysis of the direct and indirect impacts associated with the construction and modification of the floodplain and wetland.

The proposed project in San Carlos Park, FL includes sidewalk repairs and drainage system improvements. The project will provide for safety and value add to housing units, as well as improved drainage flow to protect blockages that could affect low and moderate households during severe weather. The project area is in a floodplain. Therefore, this analysis will consider impacts to the floodway along with concerns for loss of life and property.

#### **Step 2: *Notify the public for early review of the proposal and involve the affected and interested public in the decision making process.***

A public notice describing the project was published in the News-Press, a local and regional paper of general daily circulation, on July 3<sup>rd</sup>, 2021. The ad targeted local residents, including those in the floodplain and floodway project area. A list of specific agencies and individuals and a copy of the published notification is kept in the project's environmental review record and attached to this document. A copy was also posted on the Lee County Department of Human and Veteran Services website. The required 15 calendar days were allowed for public comment. As required by regulation, the notice also included the name, proposed location and description of the activity, total number of floodplain and wetland acres involved, and the responsible entity contact for information, Clare Dennehy, as well as a website and the location and hours of the office at which a full description of the proposed action can be viewed.

Public comments received will be reviewed and considered when evaluating the potential project impacts and remaining steps in the 8-step process.

*FEMA and city engineers were contacted concerning mitigation requirements of the National Flood Insurance Program (NFIP) as well as local ordinances that must be implemented as part of NFIP.*

### **Step 3: *Identify and evaluate practicable alternatives.***

Lee County selected the current project locations based on a number of criteria set from the funding source. The Florida Department of Economic Opportunity funded projects with Community Development Block Grant – Disaster Recovery funding for projects related to the long term recovery from Hurricane Irma. Projects had to have a direct tie to Hurricane Irma and benefit low to moderate income individuals. Based on this criteria, the sidewalks and canals in San Carlos Park were selected. Sidewalk damage as a result of utility vehicles parking and driving on them to restore power quickly to the neighborhood. The canals selected for this project have remaining debris and storm sediment deposited from Irma.

Lee County considered alternative sites and actions to meet the funding criteria above.

#### **A. Locate the Project Within the Floodplain and/or Wetland**

Alternative sites were considered outside of the floodplain area for sidewalk replacement and repair. However, alternative location sidewalk repairs could not be directly tied to hurricane Irma. Because the locations are within the floodplain, additional actions are being taken to ensure the floodplain is being managed. The extensive environmental review completed critically analyzes the impact from this project on the site location.

#### **B. Locate the Project Outside of the Floodplain and Wetland**

For this project to be effective, the work needs to be completed within a floodplain area. Floodplain management will increase efficacy with clear, well-flowing canals.

#### **C. No Action or Alternative Actions that Serve the Same Purpose**

A “no action” alternative was considered and rejected because this project will improve the effectiveness of the floodway. Vegetation, debris and silt removal from canals in the site location will positively impact the low to moderate income families in this area and result in more efficient water relocation in the future.

Based on these factors, the San Carlos Park project locations met the ideal criteria for this funding.

### **Step 4: *Identify Potential Direct and Indirect Impacts of Associated with Floodplain Development.***

The project location in San Carlos Park consist of sidewalk repairs and drainage improvements. Proposed repairs in the Lee County right-of-way include driveway pipes and sidewalks, which are important assets for housing access, safety, and value. Drainage system improvements will include Irma-related silt and vegetation removal from canals, ditches, and drainage pipes to eliminate flow constrictions. This work will provide safety and protect home values for these predominantly owner-

occupied, workforce, and retiree households. The County to complete restoration by clearing structural and debris constrictions and blockages in the drainage system that if left will negatively affect low-mod households during severe weather.

The highest priority of this review is to prevent the loss of life. Clearing debris from canals, ditches and drainage pipes will allow water ways to flow more efficiently in order to protect life from potential flash floods. Repairing and replacing damaged sidewalks will ensure safety of residents in an emergency situation.

Structures located in the flood zone must comply with the local flood ordinances. HUD requires projects located in the floodplain to maintain flood insurance for the life of the property. The county will maintain flood insurance in order to mitigate any effects of flooding.

In addition to concerns for life and property, the county considered the natural and beneficial values of the floodplain. The natural resources of the floodplain include water, biological, and societal resources. By clearing and cleaning the associated project locations, the floodplain will be further preserved and operate more effectively.

The Fish and Wildlife Service has determined that repairing infrastructure and drainage system improvements will have no quantifiable impact on plant and animal life. The local wetlands will not be disturbed.

Societal resources were also considered during the design process. Repairing and replacing of sidewalks throughout the community will allow residents to have safer access.

**Step 5: *Where practicable, design or modify the proposed action to minimize the potential adverse impacts to lives, property, and natural values within the floodplain and to restore, and preserve the values of the floodplain.***

- (a) Preserving Lives: Canal clearing will decrease future flooding in the project locations. Sidewalk repairs will allow local individuals to travel safely in the community.
- (b) Preserving Property: In order to preserve property, flood insurance will also be acquired and maintained in order to mitigate possible flood damage. Replaced infrastructure will be completed to the highest code to best reduce the need for further intervention.
- (c) Preserving Natural Values and Minimizing Impacts: The project is designed to improve the current drainage system by clearing overgrown vegetation and foreign debris. The construction for sidewalk replacement will be undertaken using minimally invasive techniques.

**Step 6: *Reevaluate the Alternatives.***

Although the San Carlos Park project site is in a floodplain, the project has been adapted in order to minimize effects on floodplain values. Additionally, steps were taken in order to minimize risks to

human life and property via evacuation plans, construction methods, flood insurance, etc. This project is aimed to mitigate future flooding and assist with existing functional flood plain management.

Rejecting the San Carlos Park Project could result in increased flood damage in future severe weather occurrences. If the current flood plain management structure is constricted and not running efficiently, it will be less effective in times of heavy rainfall.

A “no action” alternative is impracticable because it will not satisfy the need to provide assistance to repair and improve this area.

### **Step 7: *Determination of No Practicable Alternative***

It is Lee County’s determination that there are no practicable alternative sites for partially locating the project in a flood zone. Lee County evaluated practicable alternative sites, however Community Development Block Grant – Disaster Recovery funding must benefit low to moderate income individuals or communities. While there were other alternative sites that would benefit from sidewalk repairs and vegetation removal, this project takes place in a services area location comprised low to moderate individuals. Broken down into specific low-mod categories, 18% of the homes are in areas where the concentration of low-mod households is 70%. The remaining 82% of the project is areas where the low-mod density is 50-69.99%. These are primarily owner-occupied, single-family residences. This neighborhood is in high-demand by workforce families and retirees on fixed incomes. In addition, most of these houses are Pre-FIRM and may not meet current base flood elevations set by FEMA. Infrastructure restoration will help control/reduce flooding more cost effectively than attempting to elevate a large number of relatively low-value houses.

A final notice was published and posted consistent with the prior notice. This notice explains the reasons why the project must be located in the floodway and describes all mitigation measures taken to minimize adverse impacts and enhances beneficial floodplain values. The notice is attached to this document. No concerns were expressed by the public concerning this notice.

### **Step 8: *Implement the Proposed Action***

The county will assure that this plan, as modified and described above, is executed and necessary language will be included in all agreements with participating parties. The county will also take an active role in monitoring the construction process to ensure no unnecessary impacts occur nor unnecessary risks are taken. The flood insurance requirement for the life of the property will be monitored and maintained by Lee County.