

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

## 8-STEP PROCESS

### **Resilient SRQ Infrastructure and Public Facilities Program - North Port, Florida**

- North Port Gene Matthews Club Reconstruction and Gym Rehabilitation (Project No. B-23-UN-12-0004)
- Decision Process for Executive Order (E.O.) 11988 as Provided by 24 Code of Federal Regulations (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.***

The proposed project site is not within a 100-year floodplain or a wetland. However, as shown in the Federal Emergency Management Agency (FEMA) Community Map Panel number 12115C0386G, effective March 27, 2024, the proposed project site is within “Zone X (shaded)”, which indicates areas within the 0.2% Annual Chance Flood Hazard Area (500-year floodplain). Additionally, the proposed project site is adjoined on all sides by FEMA Special Flood Hazard Area “Zone AE” (**Attachment A**). “Zone AE” is subject to flooding by the base flood or 1% annual chance flood (100-year floodplain), and waves less than 3 feet high. The 100-year floodplain encroaches approximately 75 feet onto the northwestern corner of the parcel, and up to 50 feet along the northern property line. The proposed project, including the new Club building, expanded parking lot, and gymnasium rehabilitation are entirely outside of the 100-year floodplain.

According to the U.S. Fish and Wildlife Services’ National Wetland Inventory mapper, there are no wetlands on the project site (**Attachment B**). Suspect wetlands were not observed during the site visit completed by Nicholas Moctezuma, an Environmental Scientist at NERIS, LLC on July 15, 2024. However, no formal Waters of the United States delineation has been completed for the project site.

Since the Proposed action would include new construction, E.O. 11988 - Floodplain Management and E.O. 11990 - Wetlands Protection apply. This project does not meet any of the exceptions at 24 CFR 55.12 and therefore requires an 8-step analysis of the direct and indirect impacts associated with the construction, occupancy, and modification of the floodplain.

The Proposed Action, North Port Gene Matthews Club Reconstruction and Gym Rehabilitation, would not require any property acquisition. Project elements would include the demolition of two existing structures (damaged by Hurricane Ian), the construction of one new building (approximately 14,000 square feet), the rehabilitation of the existing gymnasium, and the expansion of the existing parking lot. The new structure would be placed immediately east of the existing damaged structures at 6851 South Biscayne Drive North Port, Florida 34287. This comprehensive renovation would enhance the Boys and Girls Club's capacity to serve members, providing a minimum 20% increase in available space. The structure would be designed to enrich adolescence experiences by offering dedicated areas for various activities and programs. The Proposed Action would be constructed to comply with green building standards and ensure that facilities are accessible for individuals living with disabilities and

senior residents, as needed. Therefore, this analysis will consider impacts to the floodplain 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 Proposed Action was published on the Sarasota County Resilient SRQ Community Development Block Grant-Disaster Recovery website at <https://www.resilientsrq.net/notices>, on August 30, 2024. The ad was posted in English and targeted local residents, including those in the floodplain. The notice was also sent to interested federal, state, and local agencies, and Native American Tribes. A list of specific agencies and individuals, as well as a copy of the published notification, is kept in the project’s environmental review record and attached to this document (**Attachment C**). The required fifteen (15) calendar days were allowed for public comment. As required by regulation, the notice outlined the name, proposed location, and description of the activity. It also included the total number of floodplain acres involved and the responsible entity contact for information (Steve Hyatt, MBA, CPM) as well as the location, phone number, and hours of the office at which more details could be provided.

No comments were received during the public review period.

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

The Resilient SRQ project selection criteria are:

- (a) The project must provide the needed community services to low-to-moderate income families in the area;
- (b) The project shall be economically feasible; and
- (c) The project should mitigate and/or minimize impacts on human health, public property, and floodplain values.

Below are the Alternatives considered by Resilient SRQ.

A. Disturbance to the Floodplain and/or Wetland:

1. Remove the Damaged Buildings, Construct a New Building, Renovate the Gymnasium, and Expand Parking Lot (Preferred Alternative)

This Alternative would consist of replacing two of the existing Boys and Girls Club buildings with a modern, resilient structure designed to withstand future wind (maximum speed 160 mph) and flood events. The Proposed Action would also consist of renovating the existing gymnasium and expanding the existing parking lot. This Alternative would allow for an increase in the Club’s capacity by 20% and allow operations to return to pre-hurricane membership. The Preferred Alternative (Proposed Action) would cause impacts to the 500-year floodplain, since the project site is located in “Zone X (shaded)” and would require ground disturbance. The Boys and Girls Club would ensure that the proper mitigation and/or minimization measures are taken. For

example, the new structure would need to be located at least two feet above Base Flood Elevation (BFE) and/or floodproofed and, if required, the gymnasium would be floodproofed in accordance with HUD standards.

2. Remove the Damaged Buildings, Renovate the Gymnasium, and Expand Parking Lot

Under this Alternative, the Boys and Girls Club would remove the two damaged buildings from the site, renovate the existing gymnasium, and expand the existing parking lot. This Alternative would result in the current temporary decrease in capacity of over 50%, more than 125 individuals, in enrollment thereby increasing unmet need in the community as the population continues to grow. Although this option would not require new construction, it would still result in ground disturbance, which would temporarily impact the 500-year floodplain. While it would cause less environmental impacts than the Preferred Alternative, it is not seen as a viable option due to the depreciation in services the Club would offer to the community.

B. No Disturbance to the Floodplain and/or Wetland:

1. Renovate the Damaged Buildings and Gymnasium

Under this Alternative, the Boys and Girls Club would renovate the two damaged buildings from the site as well as the existing gymnasium. This Alternative would not include any new construction or ground disturbance, therefore would not cause any impacts to floodplains or wetlands. However, it is not seen as a viable option due to the cost of renovating the damaged buildings exceeding 50% of the pre-storm valuation. Additionally, the action would not facilitate an increase in annual enrollment capacity of students.

2. Construct a New Boys and Girls Club on Different Property in the City of North Port

This Alternative would consist of the construction of a new Boys and Girls Club in the City of North Port. It would require the existing club to relocate and the existing members/employees to travel to an alternate location. This would either increase or decrease the travel time for some members and employees. While this Alternative would be located outside of floodplains and wetlands, it was ultimately dismissed, due to the cost of relocating and acquiring new property.

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

Under the No Action Alternative, no work would occur at the North Port Boys and Girls Club and operations would continue as is. The Club would be forced to utilize the leased portable classrooms, which would reduce the number of children from the community it can serve. The damaged buildings would continue to deteriorate, becoming more hazardous to the users of the site and an eye sore for the surrounding community. Out of the six Boys and Girls Clubs in Sarasota County, the Gene Matthews Club most consistently has a waitlist for membership. As the population

continues to grow, and therefore, potential members, the Club would not be able to meet the community's needs.

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

Since the Proposed Action would occur on previously disturbed land, there would be minimal impacts to the 500-year floodplain. Additionally, impacts would be mitigated by ensuring that the new structure would be located a minimum of two feet above the BFE and/or floodproofed. In addition, if required, the existing gymnasium would be floodproofed in accordance with HUD standards. Floodplain occupancy would not increase and the Proposed Action would enable public facilities to return to their function. The design would also minimize potential damage to the property as a result of the flooding. The area has experienced some flooding in the past. No structures or improvements would be located in the floodway and no construction activities would occur in wetlands.

As mentioned above, the new structure would be elevated a minimum of two feet above the BFE and/or floodproofed and, if required, the gymnasium would be floodproofed in accordance with HUD standards in order to protect life from potential flash floods. The additional elevation would also help protect the financial investment of the property. In the event of a hazard or threat, FEMA would issue a warning in advance to safely evacuate people from the area. According to FEMA's "Planning Considerations: Evacuation and Shelter-in-Place" the calculation for an exact warning time in advance would be based on various factors such as the type of hazard or threat, level of notice of the incident, population characteristics of the area at the time, and public behavior.

The City of North Port is a member of the National Flood Insurance Program (NFIP) and structures located in the flood zone must comply with the local flood ordinance. HUD requires projects located in the floodplain to maintain flood insurance for the life of the property. Resilient SRQ would require the subrecipient to acquire and maintain flood insurance for the life of the property in order to mitigate any effects of flooding. It should be noted that NFIP insurance is not required by HUD in the FFRMS floodplain, but is strongly encouraged.

In addition, Resilient SRQ considered the natural and beneficial values of the floodplain. The natural resources of the floodplain include water, biological, and societal resources.

Since a majority of the site is developed, the Proposed Action would have minimal effects on water resources. The proposed structure would be designed so that there would be no impacts to the natural flood and erosion control, water quality, and groundwater recharge.

The U.S. Fish and Wildlife Service has determined that the Proposed Action would have no adverse impacts on plant and animal life. Only native plants would be used on the site to reestablish vegetation post-construction. Since there would be no impacts to wetlands, no mitigation would be required. Best management practices (BMPs) for soil erosion and stormwater management would be applied through minimum construction standards. For work adjacent to the floodway, silt fencing and/or hay bales would be installed to prevent impacts from soil erosion and stormwater runoff into waterways.

Societal resources were also considered during the design process. The designs are meant to complement the natural features of the area and to offer an aesthetically pleasing structure. The site would not have an effect on agricultural lands and the existing landscaping features would be replaced.

the Boys and Girls Club would maintain an open space for recreational opportunities in the southwestern corner of the site.

**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: In order to preserve lives, local law enforcement and the emergency broadcast system would implement an early warning system should flooding conditions arise. In addition to the warning system, law enforcement has an emergency evacuation and relocation plan. All members would be briefed on the location of the flood hazard area and evacuation plans. The new building would also be located a minimum of two feet above BFE and/or floodproofed and the gymnasium would be floodproofed, if required, in accordance with HUD standards to protect any flood survivors who may be stranded during a flood event.
- (b) Preserving Property: In order to preserve property, flood insurance would also be acquired and maintained in order to mitigate possible flood damage. As stated, the new structure would be located a minimum of two feet above the BFE and/or floodproofed and the gymnasium would be floodproofed, if required, in accordance with HUD standards to enhance the structures' ability to withstand floods. All construction would be elevated consistent with FEMA's Lowest Floor Guide (<http://www.fema.gov/pdf/nfip/manual200605/07lfg.pdf>) and use flood resistant materials consistent with FEMA bulletins (see <https://www.fema.gov/media-library/assets/documents/2655?id=1580>).
- (c) Preserving Natural Values and Minimizing Impacts: By locating the the new structure at least two feet above the BFE and/or floodproofed, potentially floodproofing the gymnasium if required, and utilizing flood resistant construction materials, the Proposed Action would have minimal effects on water resources. Since the Proposed Action would occur on a previously developed site, impacts to the floodplain would also be negligible. While minimal habitat loss would occur, native vegetation would be reestablished to the extent practicable to minimize impacts to water resources. The Boys and Girls Club would implement any recommendations provided by USFWS. As mentioned above, no wetlands would be affected and BMPs for soil erosion and stormwater management would be applied. Additionally, all appliances and fixtures would be U.S. Environmental Protection Agency Energy Star certified.

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

Preferred Alternative

Although the Proposed Action is in the 500-year floodplain (not the floodway), it 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. The Boys and Girls Club would help the developer with costs, while the developer, due to a contractual obligation, alone would bear the costs of maintaining the statutorily required flood insurance premiums for the life of the structure in accordance with the Flood Disaster Protection Act of 1973.

### Remove the Damaged Buildings and Renovate the Gymnasium

This Alternative would result in decreased flood insurance costs. However, it would not meet the needs of the Boys and Girls Club and surrounding community since the membership would permanently operate at 50% of pre-hurricane conditions.

### Renovate the Damaged Buildings and Gymnasium

This Alternative would result in flood insurance costs to the Proposed Action. However, the cost of construction would not be economically feasible.

### Construct a New Boys and Girls Club on Different Property in the City of North Port

The impact to flood insurance cost is unknown; however, it would likely decrease since it would be constructed outside of a floodplain or wetland. The savings from the flood insurance would not offset the cost of relocating, property acquisition, construction, etc. The No Action Alternative is also impracticable because it would not satisfy the need to provide community services to local low-to-moderate income families and the existing structures would be hazardous to the users of the site.

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

It is Resilient SRQ's determination that there is no practicable alternative for locating the Proposed Action in the 500-year floodplain. This is due to: 1) the need to provide community services to low-to-moderate income families; 2) the need to construct an economically feasible project; and 3) the ability to mitigate and minimize impacts on human health, public property, and floodplain values. The Proposed Action allows the maximum number of Club participants to be assisted under the Infrastructure and Public Facilities Program. The Program is designed to provide for unmet needs for non-profit entities whose facilities were damaged or destroyed by Hurricane Ian. Therefore, the Preferred Alternative best meets the requirements of the Program, which includes providing safe public facilities for community members and a restoration of the services they provide.

A final notice was published on November 15, 2024, and posted consistent with the prior notice. The notice explains the reasons why the modified project must be located in the floodplain, offers a list of alternatives considered at Steps 3 and 6, and describes all mitigation measures at Step 5 taken to minimize adverse impacts and preserve natural and 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***

Resilient SRQ would assure that this plan, as modified and described above, is executed and necessary language would be included in all agreements with participating parties. The flood insurance requirement for the life of the property would be monitored by Resilient SRQ by listing the agency as an interested party on the 2<sup>nd</sup> mortgagee/other box of the flood insurance application and by placing a covenant on the property that lasts for the useful life of the structure. As stated, NFIP insurance is not required by HUD in the FFRMS floodplain, but is strongly encouraged.

For further information, please see the new HUD FFRMS Standard at [https://www.hud.gov/program\\_offices/comm\\_planning/environment\\_energy/ffrms#:~:text=This%20rule%20expands%20the%20floodplain,based%20on%20future%20flood%20risk](https://www.hud.gov/program_offices/comm_planning/environment_energy/ffrms#:~:text=This%20rule%20expands%20the%20floodplain,based%20on%20future%20flood%20risk).

“This rule expands the floodplain of concern from the 100-year floodplain to a newly defined “FFRMS floodplain.” The FFRMS floodplain is an expanded area both horizontally and vertically from the 100-year floodplain that is based on future flood risk. The rule requires that newly constructed or substantially improved structures within this newly defined floodplain be elevated or floodproofed to this higher FFRMS floodplain elevation for protection.”