**U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT: 8-STEP PROCESS - FLOODPLAIN**

**Project Name:** Santa Fe - 24-065-037-E529-street

**Responsible Entity:** City of Santa Fe

**State/Local Identifier**: 24-065-037-E529 / B-18-DP-48-0002

**Project Location:**

All work will occur in the City of Santa Fe, Galveston County, Texas at the following locations:

● Ave. M from Hwy 6 to approximately 1,233 LF south of 24th St.

● Ave L from 18th St. to 25th St.

● 18th St. from Ave L to Hwy 646

● 13th St. from Main St. to Ave H

● 21st St. from FM 646 to Ave L

● 22nd St. from Ave. L to Ave. M

● 22nd St. from Ave. L to FM 646

● 23rd St. from Ave M east 985 LF to end

● 24th St. from Ave. L to FM 646

● Ave K from 22nd St. to 25th St.

● 17th St. from Ave I to Ave H

● Ave H from Hwy 6 to 13th St.

● 23rd St. from FM 646 to Ave L

● 24th St. from Ave. L to Ave M

● 16th St. from Ave. H to Main St.

● 12th St. from Ave. L to Main St.

● 18th St. from Ave. L to Ave M

● Mulberry from 18th St. south 848 LF to end

● Main St. from Hwy 6 to 10th St.

● 16th St. from Main St. to Ave. H

**Description of the Proposed Project** [24 CFR 50.12 & 58.32; 40 CFR 1508.25]**:** Subrecipient shall rehabilitate current roadways, which includes a full depth repair finished with a final surface of asphalt, and complete associated appurtenances.

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

According to the FFRMS CISA Report, the project is in the FFRMS floodplain.

According to FEMA floodplain map #48167C0380G (Effective Date 8/15/19), the majority of the project is located in Zone X (Area of minimal risk of flooding) and a few sections of the project are located in Zone X (0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile.)

The project is not a critical action.

Area of Disturbance: 13.2 acres

This project is subject to E.O. 11988- Floodplain Management as it 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. 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.***

There are designated floodplains associated with the proposed project sites. An early floodplain notice was published regarding the project, affording the opportunity for public input.

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 acres involved, and the responsible entity contact for information (insert HUD official

under Part 50) 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.

No comments were received.

Posting Date: 6/21/24

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

The City project site selection criteria are:

(a) The project cannot cause current residents to become displaced;

(b) The project must be within the City in order for grant proceeds to be used; (c) The project must address infrastructure which was damaged due to recent flooding.

The City considered several alternative sites and actions:

1. **Do work only outside the floodplain.** It is not possible to complete work without disturbing any floodplain.

2. **Obtain a Letter of Map Amendment (LOMA) or Letter of Map Revision (LOMR**). - The City also considered applying for a LOMA Map Amendment or Letter of Map Revision but it was determined that this site would not be a good candidate for such action and the time required to request such action could not be justified.

3. **Other infrastructure considered. -** Other infrastructure projects were also considered within the City Jurisdictional limits. However, the City concluded that this project was the highest priority of any eligible projects.

4. **No Action or Alternative Actions that Serve the Same Purpose. -** A no-action alternative was considered but portions of the street system are currently not functioning properly which could pose a health hazard to the community.

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

1. Preventing loss of life and property as a result of flooding is the highest priority. Another flood could damage the new infrastructure.

2. In addition to concerns for life and property, the City has considered the natural values of the floodplain. The natural resources of the floodplain include water, biological, and societal resources. The proposed project will have minimal impacts to the floodplain because there will be minimal disturbance to the floodplain.

3. After reviewing the USFWS and TPWD Species lists, it was determined that the project area has no habitat for Threatened and Endangered Species.

4. Societal resources should also be 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 will not have an effect on agricultural lands.

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**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/floodway and to restore, and preserve the values of the floodplain/floodway.***

1. Preserving Property: Project designs should, to the best extent possible, incorporate measures to reduce the risk of damage to the new infrastructure via a flood.

2. Preserving Natural Values and Minimizing Impacts: After construction is completed, the disturbed area will need to be immediately re-vegetated with native grasses. Only native plants are to be used in the floodplain and on the site.

3. Deposition and excavation of materials will need to be performed in such a manner that erosion and sedimentation will be controlled.

4. Precautions will need to be taken in the handling of fuels or other hazardous materials to prevent discharge or spillage resulting in lower groundwater quality.

5. Erosion control measures such as hay bales or silt screen barriers will need to be implemented and maintained during construction as required.

6. The project engineer will need to incorporate best management practices into the specifications and plans.

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

1. **Do work only outside the floodplains.** Completing the project without disturbing any floodplains is not possible. (Not Viable)

2. **Obtain a Letter of Map Amendment (LOMA) or Letter of Map Revision (LOMR**). - It was determined that neither a LOMA nor a LOMR was likely nor practical for the project area. (Not Viable)

3. **Other infrastructure considered. -** After considering other potential projects in the City, it was determined that of the eligible projects, this project was of the highest priority. (Not Viable)

4. **No Action or Alternative Actions that Serve the Same Purpose. -** Portions of the street system are inadequate and must be addressed to prevent public health hazards. (Not Viable)

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

It is our determination that there are no practical alternatives for locating the project in the floodplain.

A final notice was published detailing the reasons why the project must be located in the floodplain/floodway, a list of *alternatives* considered, and all mitigation measures taken to minimize adverse impacts and preserve natural and beneficial floodplain values. No concerns were expressed by the public concerning this notice.

Posting Date: 7/11/24

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

The City 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 City will also take an active role in monitoring the construction process to ensure no unnecessary impacts occur nor unnecessary risks are taken.

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