

Introduction:

This analysis describes the decision-making process performed for the proposed rehabilitation of the 202 Franklin Avenue, Unit 4 (RRE0016287MF) in Seaside Heights Borough, Ocean County (see Exhibit 1) to comply with Executive Order 11988, Floodplain Management as required by HUD Regulations at 24 CFR Part 55.

The proposed rehabilitation consists of interior repairs to an existing single residential unit within a multi-unit structure with no expansion of structure footprint. Repairs consist of general framing, demolition, electrical, and carpentry finish work associated with flood damage.

Superstorm Sandy damaged approximately 968 homes in the Borough of Seaside Heights, Ocean County. Of the 968 damaged homes, 855 had minor damage, 42 had major damage, and 71 had severe damage¹. The Reconstruction, Rehabilitation, Elevation, and Mitigation Program addresses the post-Sandy recovery need to repair homes and make properties more resilient against future flooding.

Analysis:

The HUD floodplain management decision-making process at 24 CFR Part 55.20 contains eight steps, including public notice and an examination of practicable alternatives. However, the proposed action meets all of the criteria at 24 CFR 55.12(a), so a 5-step floodplain analysis is applicable (i.e. Steps 2, 3 and 7 are not required):

1. Funding is for an existing building or structure: The proposed project involves the rehabilitation of a single residential unit within a multi-unit structure.

2. Community is part of NFIP and in good standing: The proposed project is located in Seaside Heights Borough, NJ, which is part of the National Flood Insurance Program (NFIP) and in good standing (see Exhibit 2).

3. Action does not meet the threshold for ‘substantial improvement’ – (a). HUD funding <50% of pre-storm value, OR (b). < 20% increase in average peak number of customers or employees (for residential, it’s the number of dwelling units)

Proposed HUD funding = \$31,338.93 against Estimated Property value of \$68,208.80. Proposed funding is less than 50% of pre-storm property value. The number of units will not be increased.

4. Footprint and paved areas are not significantly increased (>10%): The footprint of the structure will not be changed as part of this project.

5. For residential, add: cannot convert a non-residential structure to a residential structure: The existing structure is residential; no use conversion proposed.

¹ New Jersey Spotlight, March 15, 2013. Interactive Map: Assessing Damage from Superstorm Sandy, source data provided by NJ DCA.
<http://www.njspottlight.com/stories/13/03/14/assessing-damage-from-superstorm-sandy/>

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

The proposed project is located in an “A” Zone (area of special flood hazard) as indicated on the Preliminary FEMA Flood Insurance Rate Map (FIRM) Map Number 34029C0329G (Panel 329 of 660) for Ocean County, effective March 28, 2014 (see Exhibit 3). Areas designated as a Special Flood Hazard Area are those subject to inundation by the 1% annual chance flood (e.g., a 100-year flood), also known as the base flood. The base flood elevation (BFE) associated with the project site is 7.0 feet above sea level (NAVD88). *(Note: the floodplain map and legend using the NJDEP HUD Environmental Review Tool depicts the floodplain zone as “A”, which is a generalized category that includes FEMA-designated zone “AE” and other non-coastal 100-year floodplain areas).*

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

Not Applicable

Step 3: Identify and evaluate practicable alternatives.

Not Applicable

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

Rehabilitation of the structure within the floodplain represents no change from pre-Sandy conditions and would not increase floodplain occupancy. No increase in building footprint, impervious surface coverage or floodplain development would occur. Furthermore, homeowners will be able to return to their homes but would not expand the housing stock relative to conditions prior to Superstorm Sandy.

Seaside Heights Borough is a member of the National Flood Insurance Program and structures located within the flood zone must comply with the local flood ordinance. HUD required projects located in the floodplain to maintain flood insurance for the economic life of the property.

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.

With the proposed improvements, potential threats to life and property would be reduced. No structure elevation is necessary or practicable, and the building footprint will not be increased or moved, therefore preserving the floodplain.

Step 6: Reevaluate the Alternatives.

Practicable alternatives to relocate the project outside of the floodplain are not available and would be contrary to the purpose and function of the proposed improvements. Similarly, the option of “no action” also remains impracticable because it will not satisfy the need for post-Sandy recovery. The No-Action alternative would also not address the State’s need for safe, decent, and affordable housing.

It is our determination that there is no practicable alternative to locating the proposed project in the flood zone. This is due to: 1) the local and statewide need for safe, affordable and decent housing in

the wake of Superstorm Sandy; 2) the existing placement of the multi-unit structure within the floodplain, whereas relocation would require disruption and displacement of other residential units, 3) the limited scope of the improvements, and 4) no net-change in floodplain impact in comparison with pre-Sandy conditions.

Overall, construction of the proposed project would not result in significant adverse impacts to flood levels, flood risk, or the flow of flood waters on the project site or surrounding areas. Implementation of the proposed action would provide cost-effective improvements with no net-change in floodplain development and increased protection for property. Therefore, the proposed project would be compliant with the National Flood Insurance Act of 1968 (44 CFR § 59) and Executive Order 11988 on Floodplain Management (42 FR 26951).

Step 7: Determination of No Practicable Alternative

Not Applicable

Step 8: Implement the Proposed Action

The DCA will ensure that the project is constructed as proposed to ensure no adverse floodplain impacts. Implementation of the proposed action may require additional local and state permits, which could place additional design modifications or mitigation requirements on the project. The applicant is required to obtain all required federal, state, and county/local permits prior to commencement of construction and comply with all permit conditions.

If the scope of work of a proposed activity changes significantly, the application for funding must be revised and resubmitted for reevaluation under the National Environmental Policy Act (NEPA).

U.S. Department of Housing and Urban Development
New Jersey Superstorm Sandy Community Development Block Grant- Disaster Recovery Program
Landlord Rental Repair Program

5-Step Floodplain Analysis - Executive Order 11988, HUD 24 CFR 55
RRE0016287MF 202 Franklin Avenue, Unit 4, Seaside Heights Borough, Ocean County

Exhibit 1: Photographs



Photograph 1: Front of subject property



Photograph 2: Front of Unit 4

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Exhibit 2: NJDEP HUD Environmental Review Tool - Floodplain and NFIP Map

Map Legend

- ▼ Non-NFIP Participating Municipalities
 -
- ▼ Floodways
 -
- ▼ FEMA Preliminary FIRMS
 - A
 - V



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Exhibit 3: FEMA Floodplain Map

