

**DOCUMENTATION
FOR
EXECUTIVE ORDER 11988 – FLOODPLAIN MANAGEMENT**

**SRP0037801
Steven Heisman
3 Oceanview Avenue
Keansburg, NJ 07734**

BASIS FOR USING 5-STEP PROCESS:

The project meets all criteria listed below per 55.12(a), so the 5-step process applies.

1. **Funding is for existing building or structure:** The proposed project involves the rehabilitation and elevation of a six-unit building.
2. **Community is part of NFIP and in good standing:** The proposed project is located in Keansburg, NJ, which is part of the NFIP and in good standing. See *1323_16_22_FloodplainMgmtandFloodInsuranceNFIPNotInFloodwayMap.pdf*
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)**

The proposed amount of HUD funding is \$235,232.74

The EPSV is \$596,688.00 (\$99,448.00 x 6 units).

HUD funding = 39.42% of pre-storm value.

The number of units will not be increased.

4. **Footprint and paved areas are not significantly increased (>10%):** the footprint 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

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 is part of the Landlord Rental Repair Program (LRRP) that is in place to help landlords of shore rental properties that were damaged by Superstorm Sandy to restore those properties for later rental to low-income families at affordable rents. The proposed project involves the rehabilitation and elevation of a six-unit building. This analysis will consider both impacts to the floodway and concerns for loss of life and property.

The proposed project is located in a 100-year floodplain per the FEMA preliminary Flood Insurance Rate Map (FIRM), which is the best available flood map. The building on the proposed project site is located within an A Zone (area of special flood hazard), as indicated on the FIRM. There are no

wetlands on or in the vicinity of the project site mapped on the Fish and Wildlife Service - National Wetlands Inventory (NWI). Wetlands were not observed during the site inspection.

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 of Associated with Floodplain Development.*

The Landlord Rental Repair program is for the restoration of rental properties that were damaged by Superstorm Sandy. No structures or improvements will be located in the floodway.

Locating the project per the proposal will have minimum impacts to the floodplain because the existing structure will be elevated and the footprint of the structure will not be altered. By elevating the building and disallowing new impervious surfaces or any change in footprint size or location, the project will have minimal effects on water resources. In addition to the prohibition on impervious surfaces in and directly around the floodplain, the floodplain will be preserved through elevation and no movement of the building footprint.

In addition, elevating the structure will protect life and property from potential flooding. The city of Keansburg is a member of the National Flood Insurance Program 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.

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.*

The proposed action includes repair and elevation of the structure to at least one foot above the best available floodplain mapping. This elevation reduces the threat of flooding damage to the home.

The applicant will be required to adhere to the following conditions to minimize the threat to property, minimize losses from flooding and high-wind events, and benefit floodplain values:

1. The rehabilitation project must adhere to the latest (most recent) elevation requirements in accordance with the Flood Hazard Area Control Act rules (N.J.A.C. 7:13). Flood elevations are now determined either using the higher of the ABFE, the effective BFE, or the design flood elevation shown on the NJDEP flood maps and
2. The applicant must carry flood insurance on the subject structure for its economic life.

Therefore, the requirements of the LRRP program will help ensure a minimal adverse impact to the floodplain.

Step 6: *Reevaluate the Proposed Action.*

The only practicable alternative would be the ‘No-Action’ alternative, which would mean that the rental property would not receive grant funding for rehabilitation. As a result, the landlord may not be able to recover the rental property. In addition, as the applicant would not be provided financial assistance to elevate the structure and the property will be more vulnerable to future flooding conditions. The No-Action alternative would neither address the State’s need for safe, decent, and affordable housing, nor would it require homes within the floodplain to be elevated to the highest standard for flood protection.

To be eligible, the landlord must rent the repaired units to low and moderate income families at approved affordable rents. The no action alternative is infeasible because it will not satisfy the need to provide assistance to local low-income families.

It is our determination that there is no practicable alternative for not locating the proposed project in the flood zone. This is due to: 1) the need to provide housing local low-income families; 2) the structure is already located within the floodplain 3) the ability to mitigate and minimize impacts on human health, public property, and floodplain values.

Step 7: *Issue Findings and a Public Explanation*

Not applicable.

Step 8: *Implement the Proposed Action*

Step eight is implementation of the proposed action. The DCA and applicant will ensure that all mitigation measures prescribed in the steps above will be adhered to.