

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

**RRE0005446MF  
Richard O'Reilly  
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Sea Bright, NJ 07760**

**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 minor rehabilitation of a residential condo unit, as necessary.
2. **Community is part of NFIP and in good standing:** The proposed project is located in Sea Bright, NJ, which is part of the NFIP and in good standing. See *NFIP\_ParticipatingCommunities\_NJ.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 \$34,512.02

The EPSV of the structure is \$1,643,300

HUD funding = 2.0% 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 RREM Program and the Small Rental Properties Program are in response to severe coastal flooding and storm damage caused by Superstorm Sandy and is addressing the State’s need for housing, especially safe, decent, and affordable housing. The purpose of this project is to rehabilitate an existing residential dwelling unit located in the Borough of Sea Bright at the address listed above. Renovations would include addressing storm-related damage and bringing the property up to current minimum property standards. All activities would be limited to the disturbed area of the existing unit. Pre-award and pre-application activities are limited to work completed within the same footprint of the damaged structure. No exterior work will be required. There will be no change in footprint, land use, or density. 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 on a parcel of approximately 620 square feet within an AE Zone (area of special flood hazard), as indicated on the FIRM. While wetlands do occur on landforms within the intracoastal waters in the vicinity of the project site, no wetlands are present within the building footprint or within 20 feet of the property. Locating the project per the proposal will have minimal impacts to the floodplain because the footprint of the structure will not be altered and no additional impervious surfaces will be created.

**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 proposed project is for the restoration and rehabilitation of a property 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 footprint of the structure will not be altered. By disallowing 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 no movement of the building footprint.

In addition, the borough of Sea Bright 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.***

Because this project consists of only rehabilitation, it does not require Flood Hazard Area permits from the Department. Pursuant to N.J.A.C. 7:13-7.2(b)4, repair of a lawfully existing structure qualifies for a Permit-by-Rule. However, the applicant must carry flood insurance on the subject structure for its economic life in order to minimize the threat to property, minimize losses from flooding and high-wind events, and benefit floodplain values. These requirements will help ensure a minimal adverse impact to the floodplain.

**Step 6: *Reevaluate the Proposed Action.***

Per 24 CFR 55.12(a)(3), since the proposed project involves only minor, interior rehabilitation to existing multifamily housing, no alternative beyond the No Action alternative was considered.

The 'No-Action' alternative would mean that the property would not receive grant funding for rehabilitation. As a result, the owner may not be able to recover the property. The No-Action alternative would not address the State's need for safe, decent, and affordable housing.

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 already being 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.