

## **Introduction:**

This analysis describes the decision-making process performed for the proposed rehabilitation of 205 6<sup>th</sup> Avenue, Unit 2 (RRE0014020MF) in Long Branch City, Monmouth 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: demolition of damaged living space; finish carpentry and trim work; new electrical and light fixtures; heat, vent & air conditioning; new windows; new doors; carpet replacement; primer and paint; plumbing work; and waterproof drywall material.

Of the total residential units sustaining major or severe damage from Superstorm Sandy statewide, approximately 20% of those were located in Monmouth County<sup>1</sup>. Twenty-five percent of the residential units in the vicinity of 205 6<sup>th</sup> Avenue (Census Tract 34025805500) experienced major or severe damage. The Reconstruction, Rehabilitation, Elevation, and Mitigation Program addresses the local need for post-Sandy recovery involving home repair and resiliency 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 Long Branch City, 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 = \$41,123.80 against Estimated Property value of \$186,933.45. 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.

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<sup>1</sup> NJ DCA, April 2013. Superstorm Sandy Community Development Block Grant Disaster Recovery Action Plan. <http://www.state.nj.us/dca/divisions/sandyrecovery/action/>

**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 the A Zone (area of special flood hazard) as indicated on the Preliminary FEMA Flood Insurance Rate Map (FIRM) Map Number 34025C0211G (Panel 211 of 457) for Monmouth County, effective January 31, 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.

Long Branch City is a member of the National Flood Insurance Program and structures located within the flood zone must comply with the local flood ordinance. HUD requires 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 as the majority of living space is elevated above the base flood elevation. 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 Proposed Action.**

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 local and statewide 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 necessary 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  
Reconstruction, Rehabilitation, Elevation, and Mitigation Program

5-Step Floodplain Analysis - Executive Order 11988, HUD 24 CFR 55  
RRE0014020MF 205 6<sup>th</sup> Avenue, Unit 2, Long Branch City, Monmouth County

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**Exhibit 1: Photographs**



Photograph 1: Front of subject property.



Photograph 2: Rear of subject property.

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



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Find Places

**Map Legend**

- ▼ Non-NFIP Participating Municipalities
  - Orange square
- ▼ Floodways
  - Blue square
- ▼ FEMA DFIRM Flood Zones
  - Yellow square (A)
  - Pink square (V)
- ▼ FEMA Preliminary FIRMS
  - Light pink square (A)
  - Light blue square (V)



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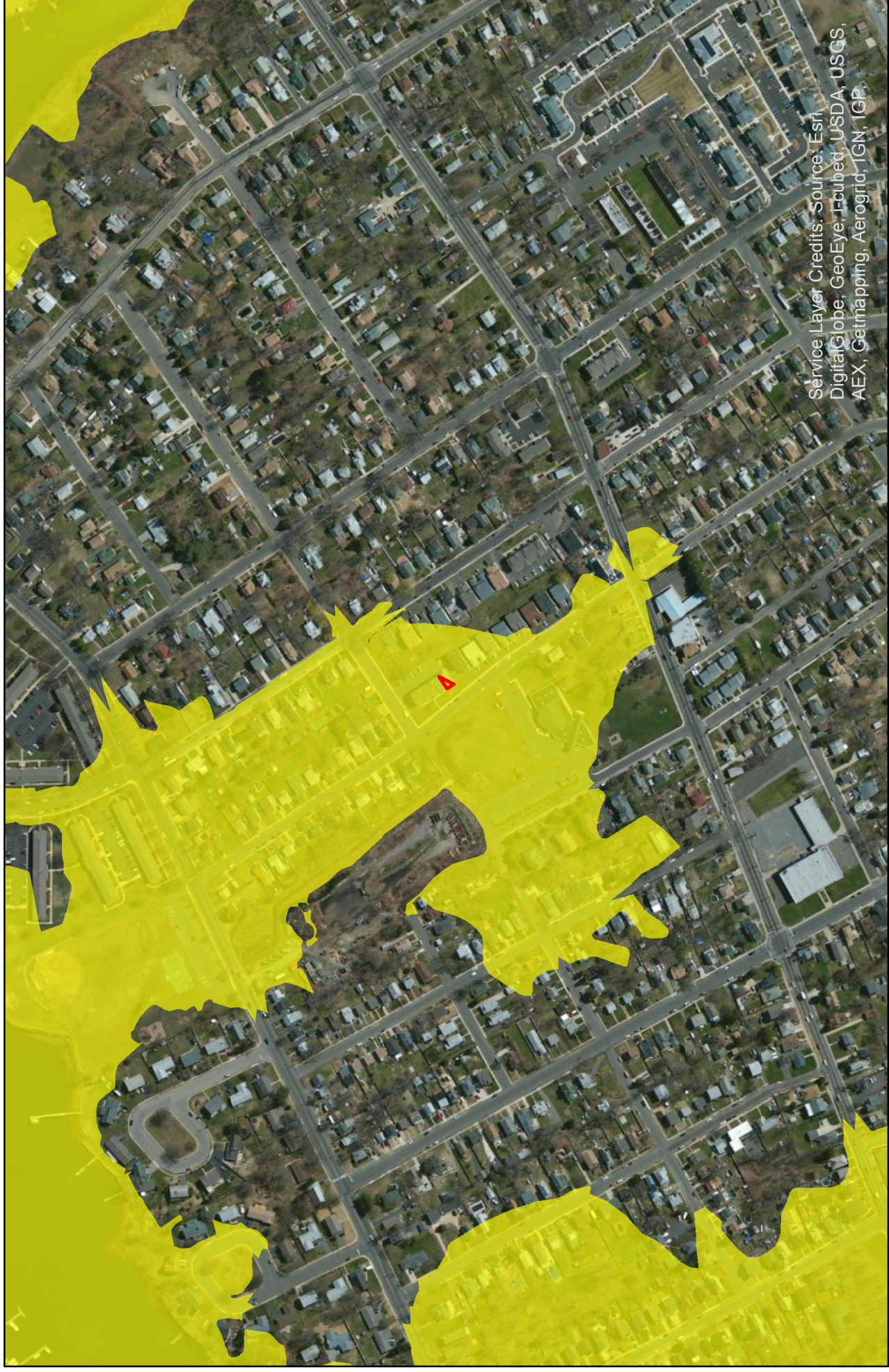
***Exhibit 3: FEMA Floodplain Map***



# NJDEP HUD Environmental Review Tool 2.1

New Jersey Department of Environmental Protection - HUD Environmental Review Tool  
Floodplain Map

Application ID#: RRE0014020MF  
PAMS\_PIN: 1327\_322\_3.41  
Location: 205 6th Avenue, Unit 2  
Municipality: Long Branch City, Monmouth County



Service Layer Credits: Source: Esri,  
DigitalGlobe, GeoEye, iCubed, USDA, USGS,  
AEX, Getmapping, Aerogrid, IGN, IGP,

FEMA DFIRM Flood Zone



RRE0014020MF

