

COMPLIANCE WITH EXECUTIVE ORDER 11988
FLOOD PLAIN MANAGEMENT
8 step project plan for Tier 1 Environmental Assessment Review for
Proposed PY2020-2024 Code Enforcement and Demolition Activities

Proposed Activity / Action:

The City of Alexandria, Louisiana's Community Development Department (CmDv) will manage Code Enforcement and Demolition Activity Programs in accordance with the PY2020-2024 Five (5) Year Consolidated Plan (5YCP). The City is aware of numerous blighted and abandoned structures throughout the City limits with a high concentration of blight within the boundaries of the Five (5) Target Neighborhoods (5TN). The City prepared a study to confirm that the 5TN's meet the criteria defined as slum, blight and deteriorating under State and local law, including an Alexandria Blight Revitalization Map in 2020.

Estimated Goals: The goals of these programs are a minimum of 375 properties investigated under Code Enforcement and approximately 375 structures to be demolished over the 5-year period. Depending on annual budgets and costs of construction, the goals may be decreased or increased. The demolition sites have not yet been identified, however by this notice, the City will complete the required eight (8) step environmental review for the entire boundary of the City limits.

Estimated Activity Costs: At the time of publication, the City estimates \$35,000 for Code Enforcement and \$100,000 for Demolition from HUD CDBG funds annually. The City also estimates \$350,000 from City General Fund and \$31,250 from City funds generated by old NSP Program Income funds annually. This equals an estimated budget total of \$2,581,250 over the 5-year period from PY2020-2024.

Process: Once complaints are received, CmDv shall process verified, valid complaints against vacant, blighted, abandoned structures. If the structure does not meet the City's Consolidated Strategy and Plan definition of "substandard condition but suitable for rehabilitation", the City Council will hold a public hearing to condemn the property. The scopes of work for all condemned properties are either publically bid and awarded to the lowest responsible, responsive bidder or assigned a Work Order to private licensed Contractors or a City crew.

Step 1 - Determination that action is in base floodplain:

The City uses the Federal Emergency Management (FEMA) Flood Insurance Rate Map (FIRM). It appears that approximately 19% of the overall City is in the 100-year floodplain and that 54% of the 5TN's are also within the 100-year floodplain. It has been determined by the City of Alexandria that Code Enforcement and Demolition Activities do not adversely affect the floodplain, but rather improves the condition.

Step 2a - Early Public Review:

On May 12, 2021, an Early public notice will be published in the Town Talk for a fifteen (15) calendar day public comment period, which will end on May 27, 2021 at 5:00 pm, with the text of the notice is as follows:

Early Notice and Public Review of Proposed
Activities in the 100-Year Floodplain

To: All interested Agencies, Groups and Individuals

This is to give notice that under 24 CFR Part 58, the City of Alexandria, Louisiana's Community Development Department (CmDv) has determined that the following proposed actions under the Community Development

Block Grant (CDBG) Code Enforcement and Demolition Programs, under Department of Housing & Urban Development (HUD) grant #B-20-MC-22-0001 through B-24-MC-22-0001, will be located in the 100-year floodplain. The City of Alexandria will be identifying and evaluating practicable alternatives to locating the action and the potential impacts on the floodplain from the proposed action, as required by Executive Order 11988, in accordance with HUD regulations at 24 CFR 55.20 Subpart C - Procedures for Making Determinations on Floodplain Management.

Proposed Activity: Code Enforcement and Demolition/Clearance – Due to the large percentage of structures within the Alexandria City limits that are deteriorated, abandoned and are not suitable for renovation, the City plans to continue its Code Enforcement and Demolition Programs over the next 5 years. The criteria for CmDv to investigate Code Enforcement complaints and take action on property for Demolition is as follows: Once complaints are received, CmDv shall process verified, valid complaints against vacant, blighted, abandoned residential or commercial structures. If the structure does not meet the City's Consolidated Strategy and Plan definition of "substandard condition but suitable for rehabilitation", the City Council will hold a public hearing to condemn the property. The scopes of work for the demolition of properties is either: publically bid and awarded to the lowest responsible, responsive bidder or an assigned a Work Order to private licensed Contractors or a City crew. All applicable federal, state and local laws will be observed during this process. The use of the property after demolition will remain the same since the City does not take ownership of the property. It shall be noted that some properties may be tax adjudicated to the City, however, no title transfer has been executed, therefore, no construction or change of use by the City will occur through these programs. A tax lien will be placed on the property for the cost of demolition and payment is required with the payment of taxes.

Total number of acres: The total area for the defined City limits of Alexandria is approximately 18,680 acres. However, the overall area within the 100-year floodplain for the entire City of Alexandria is approximately 3,500 acres and will potentially be affected. That equates to almost 19% of the City. It also appears that 54% of the 5TN's are within the 100-year floodplain. The proposed Code Enforcement and Demolition activities will remove structures in the floodplain, therefore, should have no negative effect on the natural floodplain process.

Estimated Goals: The goals of these programs are a minimum of 375 properties investigated under Code Enforcement and approximately 375 structures to be demolished over the 5-year period. Depending on annual budgets and costs of construction, the goals may be decreased or increased. The demolition sites have not yet been identified, however by this notice, the City is completing the required eight (8) step environmental review for the entire boundary of the City limits.

Estimated Activity Costs: At the time of publication, the City estimates \$35,000 for Code Enforcement and \$100,000 for Demolition from HUD CDBG funds annually. The City also estimates \$350,000 from City General Fund and \$31,250 from City funds generated by old NSP Program Income funds annually. This equals an estimated budget total of \$2,581,250 over the 5-year period from PY2020-2024.

Notice: There are three primary purposes for this fifteen (15) day notice. First, people who may be affected by activities in floodplains and those who have an interest in the protection of the natural environment should be given an opportunity to express their concerns and provide information about these areas. Commenters are encouraged to offer alternative sites outside of the floodplain, alternative methods to serve the same project purpose, and methods to minimize and mitigate impacts. Second, an adequate public notice program can be an important public educational tool. The dissemination of information and request for public comment about floodplains can facilitate and enhance Federal efforts to reduce the risks and impacts associated with the occupancy and modification of these special areas. Third, as a matter of fairness, when the Federal government determines it will participate in actions taking place in floodplain, it must inform those who may be put at greater or continued risk.

Alternative Methods Considered: This project is to investigate Code Enforcement complaints and demolish abandoned, blighted structures, therefore, alternative sites or method cannot be considered. The only real alternative would be to consider no demolition activity, which would be detrimental to these neighborhoods and revitalization efforts for the City.

Written comments must be received by the City of Alexandria's Community Development Office at the following address on or before May 27, 2021 by 5:00 pm. Comments can also be sent to cda@cityofalex.com. A full description of the activities and projects may also be reviewed at the City's Community Development Office during normal business hours, weekdays 8:00 am to 4:00 pm at 625 Murray Street, 3rd Floor or by visiting www.cityofalexandriala.com/Community-Development.

Date of Notice: May 12, 2021. Contact the City of Alexandria's Community Development Office at 318-449-5072; visit at 625 Murray Street, Suite 7, Third Floor, Alexandria, LA 71309; or email to cda@cityofalex.com. Certifying Officer: Jeffrey W. Hall, Mayor.

-END.

[Step 2b - Early Public Review:](#)

On May 12, 2021, an Early public notice was published in the Town Talk for a fifteen (15) calendar day public comment period. As of May 27, 2021 at 5:00 pm, **no comments were received.**

[Step 3 – Alternatives:](#)

Consideration will be given to the three sets of criteria for Alternatives:

a. Alternate Sites:

The Community Development Office gave consideration to selecting properties outside the flood-prone areas of the City. The City's flood insurance rate maps indicate that approximately 19% of the City is in the floodplain and about 54% of the low-income residential areas within the (5TN) of the City are affected. These areas are the neighborhoods most affected by the blighting influence of dilapidated structures. The dilapidated structures are already in place. The deteriorated condition of the units pose a danger to the health and safety of the neighborhood residents. Therefore, there are no practical alternatives to Code Enforcement or Demolition Activities of vacant, dilapidated, structures in flood-prone areas.

b. Alternate Actions:

Due to the nature of the Code Enforcement and Demolition Activity Programs, the only alternative action to consider is NO ACTION.

c. No Action Alternative

Consideration was given to doing nothing to structures within the flood-prone areas. The structures to be investigated and possibly demolished are a danger to the health and safety of the neighborhood and are a blighting influence to the area that will perpetuate disinvestment. To not implement this activity would cause an adverse impact on the neighborhood and overall perception of the City.

[Step 4 - Impacts of the Proposed Actions:](#)

The two (2) proposed CDBG activities for Code Enforcement and Demolition present no adverse impacts and are considered compatible within the floodplain. Removing the structures allows the area to return to its original condition and natural contours. Demolition of vacant, dilapidated structures will have a positive impact on the

area since more exposed soil will be able to absorb water rather than divert or obstruct it. These abandoned structures are fire hazards, havens for criminal activity, eyesores in the area and reduce property values.

Step 5. Minimize, Restore and Preserve:

These activities will minimize the adverse impact that the presence of vacant, dilapidated structures has on the neighborhood and the floodplain. Demolition of these structures will restore the lot to its original state and help preserve the integrity of the neighborhood and restore the natural and beneficial values of the floodplain. The City will ensure erosion control measures, such as placing hay within 20 feet of the street curb during demolition, will be done to protect streets from runoff in compliance with Chapter 29 of the City's Municipal Codes. At this time, there are no plans to redevelop the sites post demolition; however, if the sites are developed in the future, the City will comply with regulations within the series of International Code Council, Louisiana State adopted codes and FEMA building code requirements for construction in a floodplain, such as ensuring that the lowest foundation framing member is a minimum of 12 inches plus 2% grade above the street gutter or approved drainage, as required in IRC 403.1.7.3.

Step 6 - Re-evaluate Alternatives:

In actuality, the only alternative action to consider is no action. Revitalization of low-income areas is essential for the neighborhood to remain a viable area of the community; therefore, the demolition of vacant, dilapidated, existing structures is the only practical action to take. Abandoning these neighborhoods will cause further decline, which is not a viable option. The City is researching options to incentivize the property owners to re-build on the newly cleared lots; and to obtain clear title on the properties once the property has been adjudicated. In the event that the City could take legal possession of the property, the City could solicit the land for re-development. The concept of re-development could bring new, affordable housing and/or business to these areas that need it most in all 5TN's. Re-development strategies would address the issue of reuse and mitigation measures for new development in the floodplain.

Step 7A. Findings and Public Explanation

On May 28, 2021, a Final Floodplain public notice will be published in the Town Talk for a seven (7) day public comment period, which will end on June 4, 2021 at 5:00 pm, with text as follows:

Final Notice and Public Explanation of a Proposed Activity in a 100-Year Floodplain

To: All interested Agencies, Groups and Individuals:

This is to give notice that the City of Alexandria, Louisiana's Community Development Department (CmDv) has conducted an evaluation as required by Executive Order 11988, in accordance with HUD regulations at 24 CFR 55.20 Subpart C Procedures for Making Determinations on Floodplain Management and Wetlands Protection. The Community Development Block Grant (CDBG) shall implement Code Enforcement and Demolition Activity Programs, under Department of Housing & Urban Development (HUD) grant #B-20-MC-22-0001 through B-24-MC-22-0001. An Early Notice appeared in The Town Talk on May 12, 2021, inviting comments regarding these actions. The City of Alexandria intends to carry out the following proposed Activities and actions that may affect or be affected by the 100-year floodplain. The Combined Notice (FONSI/NOI/RROF) is also running concurrently with this notice.

Proposed Activity: Code Enforcement and Demolition/Clearance – Due to the large percentage of structures within the Alexandria City limits that are deteriorated, abandoned and are not suitable for renovation, the City

plans to continue its Code Enforcement and Demolition Programs over the next 5 years. The criteria for CmDv to investigate Code Enforcement complaints and take action on property for Demolition is as follows: Once complaints are received, CmDv shall process verified, valid complaints against vacant, blighted, abandoned residential or commercial structures. If the structure does not meet the City's Consolidated Strategy and Plan definition of "substandard condition but suitable for rehabilitation", the City Council will hold a public hearing to condemn the property. The scopes of work for all condemned properties are either: publically bid and awarded to the lowest responsible, responsive bidder or an assigned a Work Order to private licensed Contractors or a City crew. All applicable federal, state and local laws will be observed during this process. The use of the property after demolition will remain the same since the City does not take ownership of the property. It shall be noted that some properties may be tax adjudicated to the City, however, no title transfer has been executed, therefore, no construction or change of use by the City will occur through these programs. A tax lien will be placed on the property for the cost of demolition and payment is required with the payment of taxes.

Total number of acres: The total area for the defined City limits of Alexandria is approximately 18,680 acres. However, the overall area within the 100-year floodplain for the entire City of Alexandria is approximately 3,500 acres and will potentially be affected. That equates to almost 19% of the City. It also appears that 54% of the 5TN's are within the 100-year floodplain. The proposed Code Enforcement and Demolition activities will remove structures in the floodplain, therefore, should have no negative effect on the natural floodplain process.

Estimated Goals: The goals of these programs are a minimum of 375 properties investigated under Code Enforcement and approximately 375 structures to be demolished over the 5-year period. Depending on annual budgets and costs of construction, the goals may be decreased or increased. The demolition sites have not yet been identified, however by this notice, the City is completing the required eight (8) step environmental review for the entire boundary of the City limits.

Estimated Activity Costs: At the time of publication, the City estimates \$35,000 for Code Enforcement and \$100,000 for Demolition from HUD CDBG funds annually. The City also estimates \$350,000 from City General Fund and \$31,250 from City funds generated by old NSP Program Income funds annually. This equals an estimated budget total of \$2,581,250 over the 5-year period from PY2020-2024.

Alternative Methods Considered: This project is to investigate Code Enforcement complaints and demolish abandoned, blighted structures, therefore, alternative sites or method cannot be considered. The only real alternative would be to consider no demolition activity, which would be detrimental to these neighborhoods and revitalization efforts for the City.

a. Alternate Sites:

The Community Development Office gave consideration to selecting properties outside the flood-prone areas of the City. The City's flood insurance rate maps indicated that approximately 19% of the city is in the floodplain and about 54% of the low-income residential areas of the city are affected. These areas are the neighborhoods most affected by the blighting influence of dilapidated structures. The dilapidated structures are already in place. The deteriorated condition of the units pose a danger to the health and safety of the neighborhood residents. Therefore, there are no practical alternatives to Code Enforcement or Demolition Activities of vacant, dilapidated, structures in flood-prone areas.

b. Alternate Actions:

Due to the nature of the Code Enforcement and Demolition Activity Programs, the only alternative action to consider is NO ACTION.

c. No Action Alternative

Consideration was given to doing nothing to structures within the flood-prone areas. The structures to be investigated and possibly demolished are a danger to the health and safety of the neighborhood and are a

blighting influence to the area that will perpetuate disinvestment. Not to implement this activity would cause an adverse impact on the neighborhood and overall perception of the City.

Notice: The City of Alexandria has reevaluated the alternatives to demolishing properties in the floodplain and has determined that it has no practicable alternative. Environmental files that document compliance with steps 3 through 6 of Executive Order 11988, are available for public inspection, review and copying upon request at the times and location delineated in the last paragraph of this notice for receipt of comments.

There are three primary purposes for this notice. First, people who may be affected by activities in floodplains and those who have an interest in the protection of the natural environment should be given an opportunity to express their concerns and provide information about these areas. Commenters are encouraged to offer alternative sites outside of the floodplain, alternative methods to serve the same project purpose, and methods to minimize and mitigate impacts. Second, an adequate public notice program can be an important public educational tool. The dissemination of information and request for public comment about floodplains can facilitate and enhance Federal efforts to reduce the risks and impacts associated with the occupancy and modification of these special areas. Third, as a matter of fairness, when the Federal government determines it will participate in actions taking place in floodplain, it must inform those who may be put at greater or continued risk.

Written comments must be received by the City of Alexandria's Community Development Office at the following address on or before June 4, 2021 at 5:00 pm. Comments can also be sent to cda@cityofalex.com. A full description of the activities and projects may also be reviewed at the City's Community Development Office during normal business hours, weekdays 8:00 am to 4:00 pm at 625 Murray Street, 3rd Floor or by visiting www.cityofalexandrialala.com/Community-Development.

Date of Notice: May 28, 2021. Contact the City of Alexandria's Community Development Office at 318-449-5072; visit at 625 Murray Street, Suite 7, Third Floor, Alexandria, LA 71309; or email to cda@cityofalex.com. Certifying Officer: Jeffrey W. Hall, Mayor.

-END.

Step 7b. Findings and Public Explanation

On May 28, 2021, a Final public notice was published in the Town Talk for a seven (7) calendar day public comment period. The Final Notice was run concurrently with the Notice of Intent for Request for Release of Funds (NOI RROF). Text for the NOI RROF is as follows. As of June 4, 2021 at 5:00 pm, **no comments were received.**

Notice of Intent to Request for Release of Funds (RROF) For Tiered Projects and Activities

These combined notices shall satisfy two separate but related procedural requirements for activities to be undertaken by the City of Alexandria, Louisiana. This is for a Tier 1 Broad Environmental Assessment Review.

On or after June 15, 2021, the City of Alexandria will submit a request to the US Department of Housing and Urban Development (HUD) for the release of Community Development Block Grant funds under Title 1 of the Housing and Community Development Act of 1974. This 15 calendar day notice is intended to allow public comments on the undertaking of the following 2 Activities:

Tier 1 Broad Environmental Assessment Review Project / Program Title: PY2020-2024 Code Enforcement and Demolition / Clearance Program. These programs are necessary in order to eliminate specific conditions of blight or physical decay of abandoned residential and/or commercial structures within the City limits of Alexandria, with the highest concentration of work within the 5 Target Neighborhoods. The goals of the two programs are a minimum of 375 properties investigated under Code Enforcement and approximately 375 structures to be demolished over the 5-year period. Depending on annual budgets and costs of construction, the goals may be decreased or increased.

Level of Environmental Review: Environmental Assessment is required because some of the structures addressed may be commercial and/or may be in the 100-year flood plain. Therefore, EA level review is required by 24 CFR Part 58.5 and 58.6, as well as the National Environmental Policy Act (NEPA). Tier 2 site specific reviews will cover the 3 following laws and authorities not addressed in the Tier 1 Broad EA Review: State Historic Preservation, Cultural Preservation of Indian Tribes, and US Fish and Wildlife. The demolition sites have not yet been identified; however, the City will complete the required eight (8) step environmental review for the entire boundary of the City limits because 54% of the 5 Target Neighborhoods are within the 100-year floodplain.

Project National Objectives: The Code Enforcement Activity is eligible under 24 CFR 570.208(a)(1) as Low Mod Area benefit because more than 50% of the City is also identified as 5 Target Neighborhood areas, meaning that according to the 2018 Census study, is 51% low and moderate income residents. The Demolition Activity is eligible under 24 CFR 570.208(b)(1) as Slum Blight Area benefit because it meets the criteria defined as slum, blight and deteriorating under State and local law, including an Alexandria Blight Revitalization Map confirmed in 2020. The Demolition Activity will also use 24 CFR 570.208(b)(2) for Slum Blight Spot Basis, to qualify properties demolished outside of the 5 Target Neighborhood areas.

Mitigation Measures / Conditions / Permits (if any): For Tier 2 site specific addresses, a packet will be generated to include a picture of the structure to be demolished and a map of the structure location will be attached to a statement describing the type of work to be performed. This packet will be submitted to the State Historic Preservation Agency for clearance of historic properties; the Cultural Preservation of Indian Tribes Agency clearance of archeological or religious properties; and to the US Fish and Wildlife Agency for the clearance of endangered species. In the event a property is identified of significance, the City will not pursue demolition unless detailed measures are defined and approved by the authorizing Agency. In the event that a structure must be demolished immediately due to public threat of health and safety, there may not be time for a Tier 2 Site Specific review to be prepared. However, as allowed in 24 CFR 1506.11, the City will consult the 3 affected Agencies for clearance or alternative arrangements.

Estimated Activity Costs: At the time of publication, the City estimates \$35,000 for Code Enforcement and \$100,000 for Demolition from HUD CDBG funds annually. The City also estimates \$350,000 from City General Fund and \$31,250 from City funds generated by old NSP Program Income funds annually. This equals an estimated budget total of \$2,581,250 over the 5-year period from PY2020-2024.

Code Enforcement and Demolition Activities proposed are considered maintenance per 24 CFR 58.35(b)(3) and will be Categorically Excluded Not Subject to 24 CFR 58.5 (CENST) from National Environmental Policy Act of 1969 (NEPA). Additional project information is contained in the Environmental Assessment Record on file at the City's Community Development Office during normal business hours, weekdays 8:00 am to 4:00 pm at 625 Murray Street, 3rd Floor.

Finding of No Significant Impact (FONSI)

The City of Alexandria has determined that these Activities will have no significant impact on the human environment. Therefore, an Environmental Impact Statement under the National Environmental Policy Act of 1969 (NEPA) is not required. Additional project information is contained in the Environmental Review Record

(ERR) on file at the City's Community Development Office during normal business hours, weekdays 8:00 am to 4:00 pm at 625 Murray Street, 3rd Floor.

Public Comments

Any individual, group or agency may submit written comments on the Environmental Review Record (ERR) to the City of Alexandria's Community Development Office. Comments can also be sent to cda@cityofalex.com. **All comments must be received by June 14, 2021 by 5:00 pm** will be considered by the City of Alexandria prior to authorizing submission of a request for release of funds. Comments must specify which Notice is being addressed. The ERR will be sent to HUD on June 15, 2021.

Environmental Certification

The City of Alexandria certifies to HUD that Jeffrey W. Hall, in his capacity as Mayor of the City of Alexandria, consents to accept the jurisdiction of the Federal Courts if an action is brought to enforce responsibilities in relation to the environmental review process and that these responsibilities have been satisfied. HUD's approval of the certification satisfies its responsibilities under NEPA and related laws and authorities and allows the City of Alexandria to use HUD program funds.

Objections to Release of Funds

HUD will accept objections to its release of funds and the City of Alexandria's certification for a period of fifteen (15) calendar days following the anticipated submission date or its actual receipt of the request (whichever is later) only if they are on the following bases: (a) the certification was not executed by the Certifying Officer of the City of Alexandria; (b) the City of Alexandria has omitted a step or failed to make a decision or finding required by HUD regulations at 24 CFR Part 58; (c) the grant recipient or other participants in the development process have committed funds, incurred costs or undertaken activities not authorized by 24 CFR Part 58 before approval of a release of funds by HUD; or (d) another Federal agency acting pursuant to 40 CFR Part 1504 has submitted a written finding that the project is unsatisfactory from the standpoint of environmental quality. Objections must be prepared and submitted in accordance with the required procedures (24 CFR Part 58, Section 58.76) and shall be addressed to Ms. Cheryl S. Breaux, Director of Community Planning and Development, US Department of Housing and Urban Development, Hale Boggs Federal Building, 500 Poydras Street, 9th Floor, New Orleans, LA 70130-3099. Potential objectors should contact HUD to verify the actual last day of the objection period.

Date of Notice: May 28, 2021. Contact the City of Alexandria's Community Development Office at 318-449-5072; postal mail to 625 Murray Street, Suite 7; or visit the Third Floor; Alexandria, LA 71301; or email to cda@cityofalex.com. City of Alexandria's Certifying Officer: Jeffrey W. Hall, Mayor.

-End.

Step 8. Implement Action

The review has been completed and there were no objective comments, therefore, the Code Enforcement and Demolition Activities will be implemented when the all HUD requirements have been met. The City, during the course of implementation, will take the appropriate steps to see that any mitigation encountered will be administered and documented. All applicable federal, state and local laws will be observed during this process.

Attachments:

1. FEMA map indicating 100-year floodplain for the City of Alexandria

[Final Instructions:](#)

This document shall be uploaded to the City's Community Development webpage as soon as the Early Flood Plain notice is published and shall be removed on the final day of HUD's comment review period for the Request for the Release of Funds notice, which is expected to be June 15, 2021.

This document shall also be retained for review in accordance with HUD's document retention policies.