COMPLIANCE WITH EXECUTIVE ORDER 11988 FLOOD PLAIN MANAGEMENT

8 step project plan for September 2017 proposed demo's – 11 in Floodplain

Proposed Activity / Action:

CmDv has seventeen (17) properties scheduled for demolition in September 2017 that will be funded with HUD CDBG money. The properties have met the criteria authorizing CmDv to take action for demolition: CmDv has verified a valid complaint against a vacant structure because the structure does not meet the City's Consolidated Strategy and Plan definition of "substandard condition but suitable for rehabilitation" and City Council has condemned the property through a Public Hearing process. The scopes of work were individually and publically bid, then awarded to the lowest responsible, responsive bidder.

Step 1 - Determination that action is in base floodplain:

Eleven (11) of the properties identified for demolition are within the Federal Emergency Management (FEMA) Flood Insurance Rate Map (FIRM) Community Panel #220146-0015F dated 9/3/1997 and Community Panel #220146-0010F dated 9/3/1997.

Step 2 - Early Public Review:

On July 23, 2017, an Early public notice was published in the Town Talk for a fifteen (15) day public comment period with the text of the notice is as follows. As of 5:pm on August 8, 2017, no comments were received.

Early Notice and Public Review of a Proposed Activity in a 100-Year Floodplain

This is to give notice that the City of Alexandria's Community Development Department (CmDv) has determined that the following proposed action under the Community Development Block Grant (CDBG) Demolition Program, under Department of Housing & Urban Development (HUD) grant #B-16-MC-22-0001 is located in the 100-year floodplain, and CmDv will be identifying and evaluating practicable alternatives to locating the action in the floodplain 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: Demolition/Clearance – Due to the large percentage of structures within the city limits of Alexandria that are deteriorated and are not suitable for renovation, the city plans to continue its spot Demolition Program. The criteria for CmDv to take action on property for demolition is: CmDv has verified a valid complaint against a vacant structure because the structure does not meet the City's Consolidated Strategy and Plan definition of "substandard condition but suitable for rehabilitation" and City Council has condemned the property through a Public Hearing process. 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, therefore, no construction or change of use by the City will occur through this program. A tax lien will be placed on the property for the cost of demolition and payment is required with the payment of taxes. This activity is budgeted at \$97,948 of CDBG funds. Approximately 17 units will be demolished within the city limits of Alexandria with an estimated 11 units being located within the 100-year floodplain, according to the Community Panel #220146-0015F dated 9/3/1997 and Community Panel #220146-0010F dated 9/3/1997. For the specific list of properties in the 100-year flood plain, please visit the City's webpage to review the map and address list. See directions to the webpage in the second to last paragraph of this notice. The average lot size is 100 ft., therefore, an estimated 2.5 acres of floodplain will potentially be involved. For reference, there is approximately

3,500 acres in the City of Alexandria limits that is inside the 100-year floodplain. The proposed activity will remove structures in the floodplain, therefore, should have no negative effect on the natural floodplain process.

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. This project is to demolish existing 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. Commenters may offer 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 floodplains, it must inform those who may be put at greater or continued risk.

Interested persons can download the proposed plan and map indicating the 17 properties to be demolished from the City's website: www.cityofalexandriala.com, under the heading "Services" / "Community Development", then click on the right side tab for "Floodplain Management Review". A full description of the project may also be provided by request to our office during normal business hours. All comments will be given careful consideration prior to any further action on the part of the City towards plan implementation. Comments must be received before 4:00 PM on August 8, 2017. Any comments after that time will not be considered.

Contact the City of Alexandria's Community Development Office at 318-449-5072; visit at 625 Murray Street, Third Floor; postal mail to PO Box 71, Alexandria, LA 71309; or email to cda@cityofalex.com. Certifying Officer: Jacques M. Roy, Mayor.

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 indicated that approximately 38% of the city is in the floodplain and about 80% 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 is a danger to the health and safety of the neighborhood residents. Therefore, there are no practical alternatives to demolition of vacant, dilapidated, structures in flood-prone areas.

b. Alternate Actions:

Due to the nature of the demolition program, 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 demolished are a danger to the health and safety of the neighborhood and are a blighting influence to the area. Not to implement this activity would cause an adverse impact on the neighborhood.

Step 4 - Impacts of the Proposed Actions:

There are no adverse impacts due to the proposed CDBG activity. Demolition is 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. These units are a fire hazard, they are used for criminal activity, they are eyesores in the area and they reduce property values.

Step 5. Minimize, Restore and Preserve:

This activity will minimize the adverse impact 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.

Step 6 - Re-evaluate Alternatives:

In actuality, the only alternative action to consider was 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 to further decline is not an 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 to the City. In the event that the City could take legal possession of the property, CmDv could solicit the land for redevelopment. The concept of re-development could bring new, affordable housing and/or business to these areas that need it most in all CDBG target neighborhoods. Re-development strategies would address the issue of what to do with vacant lots and mitigation measures for new development in the floodplain.

Step 7A. Findings and Public Explanation

On August 9, 2017, a Final Floodplain public notice was published in the Town Talk for a seven (7) day public comment period with text as follows. As of 5:pm on August 16, 2017, no comments were received.

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

This is to give notice that the City of Alexandria'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 activity is funded under the Community Development Block Grant (CDBG) Demolition Program, under Department of Housing & Urban Development (HUD) grant #B-16-MC-22-0001. An Early Notice appeared in *The Town Talk* on July 23, 2017, inviting comments regarding these actions. The City of Alexandria intends to carry out the following proposed actions that may affect or be affected by the 100-year floodplain. The Notice of Intent for Request for Release of Funds (NOI RROF) notice is also running concurrently with this notice.

Proposed Activity: Demolition/Clearance – Due to the large percentage of structures within the city limits of Alexandria that are deteriorated and are not suitable for renovation, the city plans to continue its spot Demolition Program. The criteria for CmDv to take action on property for demolition is: CmDv has verified a valid complaint against a vacant structure because the structure does not meet the City's Consolidated Strategy and Plan definition of "substandard condition but suitable for rehabilitation" and City Council has condemned the property through a Public Hearing process. 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, therefore, no construction or change of use by the City will occur through this program. A tax lien will be placed on the property for the cost of demolition and payment is required with the payment of taxes. This activity is budgeted at \$97,948 of CDBG funds. Approximately 17 units will be demolished within the city limits of Alexandria with an estimated 11 units being located within the 100-year floodplain, according to the Community Panel #220146-0015F dated 9/3/1997. For the specific list

of properties in the 100-year flood plain, please visit the City's webpage to review the map and address list. See directions to the webpage in the second to last paragraph of this notice. The average lot size is 100 ft. by 100 ft., therefore, an estimated 2.5 acres of floodplain will potentially be involved. For reference, there is approximately 3,500 acres in the City of Alexandria limits that is inside the 100-year floodplain. The proposed activity will remove structures in the floodplain, therefore, should have no negative effect on the natural floodplain process.

Due to the specific character of the proposed action of demolishing existing vacant, deteriorated structures, CmDv concluded that there are no practicable alternatives to this action in regards to alternative sites outside the floodplain or alternative methods to serve the same project purpose. The City's Community Panel flood maps indicate that approximately 38% of the city is in the floodplain and about 80% 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 housing units are already in place. The deteriorated condition of the units is a danger to the health and safety of neighborhood residence.

Consideration was given to doing nothing to residences within the flood-prone areas. It was determined that the only practical alternative is to demolish these units since it is not feasible to repair them. Not demolishing them would cause an adverse impact on the neighborhood. Demolition of these structures will minimize the adverse impact they have on the neighborhood and the floodplain which results in a positive impact. 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.

This activity will not adversely impact the existing floodplain values because it involves demolition of existing vacant structures. Removing the structures allows the area to return to its original condition and natural contours and therefore should have no negative impact to the floodplain but to restore the natural and beneficial values.

There are three primary purposes for this seven (7) 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. 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 floodplains, it must inform those who may be put at greater or continued risk.

Interested persons can download the proposed plan and map indicating the 5 CDBG Target Neighborhoods from the City's website: www.cityofalexandriala.com, under the heading "Services" / "Community Development", then click on the right side tab for "Floodplain Management Review". A full description of the project may also be provided by request to our office during normal business hours. All written comments will be given careful consideration prior to any further action on the part of the City towards plan implementation. Comments must be received before 4:00 PM on August 16, 2017. Any comments after that time will not be considered.

Contact the City of Alexandria's Community Development Office at 318-449-5072; visit at 625 Murray Street, Third Floor; postal mail to PO Box 71, Alexandria, LA 71309; or email to cda@cityofalex.com. Certifying Officer: Jacques M. Roy, Mayor.

Step 7B. Findings and Public Explanation

On August 9, 2017, Notice of Intent for Request for Release of Funds (NOI RROF) was published in the Town Talk for a seven (7) day public comment period and will run concurrently with the Final Floodplain notice. Text for the NOI RROF is as follows. As of 5:pm on August 16, 2017, no comments were received.

Request for Release of Funds (RROF)

On or after August 17, 2017, 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, to undertake the following projects:

CDBG Demolition / Clearance Program – funds in the amount of \$97,948 will be used to demolish approximately 17 vacant, dilapidated, condemned structures within the City limits in order to eliminate specific conditions of blight or physical decay. 11 of the structures are located in the 100 year flood plain.

Project Issues: The above activities are categorically excluded under HUD regulations at 24 CFR Part 58 from National Environmental Policy Act (NEPA) requirements. The demolition sites have been identified and have completed the required eight (8) step environmental review. An Environmental Review Record (ERR) that documents the environmental determinations has also been performed. Under 36 CFR Part 800, when houses are selected a photo of the structure with a map of the location and a statement of the type of work has been submitted to the State Historic Preservation Office for clearance of historic properties. For the specific list of properties in the 100-year flood plain, please visit the City's webpage to review the map and address list. See directions to the webpage in the second to last paragraph of this notice.

Public Comments

Any individual, group or agency may submit written comments on the ERR to the City of Alexandria's Community Development Office. All comments must be received by August 16, 2017 by 4:00 pm to be considered prior to authorizing submission of a request for release of funds. Comments must specify which Notice is being addressed. The ERR is expected to be sent to HUD on August 17, 2017. The Final Floodplain Notice is also running concurrently with this notice.

Environmental Certification

The City of Alexandria certifies to HUD that Jacques M. Roy, 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 days (15) following the anticipated submission date or its actual receipt of the request (whichever is later) only if they are on one of 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 qualify. 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, which is anticipated to be September 1, 2017. HUD's estimated release of funds is three (3) business days after their review period.

Interested persons can download the proposed plan and map indicating the 17 properties to be demolished from the City's website: www.cityofalexandriala.com, under the heading "Services" / "Community Development", then click on the right side tab for "Floodplain Management Review". A full description of the project may be provided by request to our office during normal business hours. All written comments will be given careful consideration prior to any further action on the part of the City. Comments must be received before 4:00 PM on August 16, 2017. Any comments after that time will not be considered.

Contact the City of Alexandria's Community Development Office at 318-449-5072; visit at 625 Murray Street, Third Floor; postal mail to PO Box 71, Alexandria, LA 71309; or email to cda@cityofalex.com. City of Alexandria's Certifying Officer: Jacques M. Roy, Mayor.

Step 8. Implement Action

The review has been completed and there were no objective comments, therefore, the demolition activity / action 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.

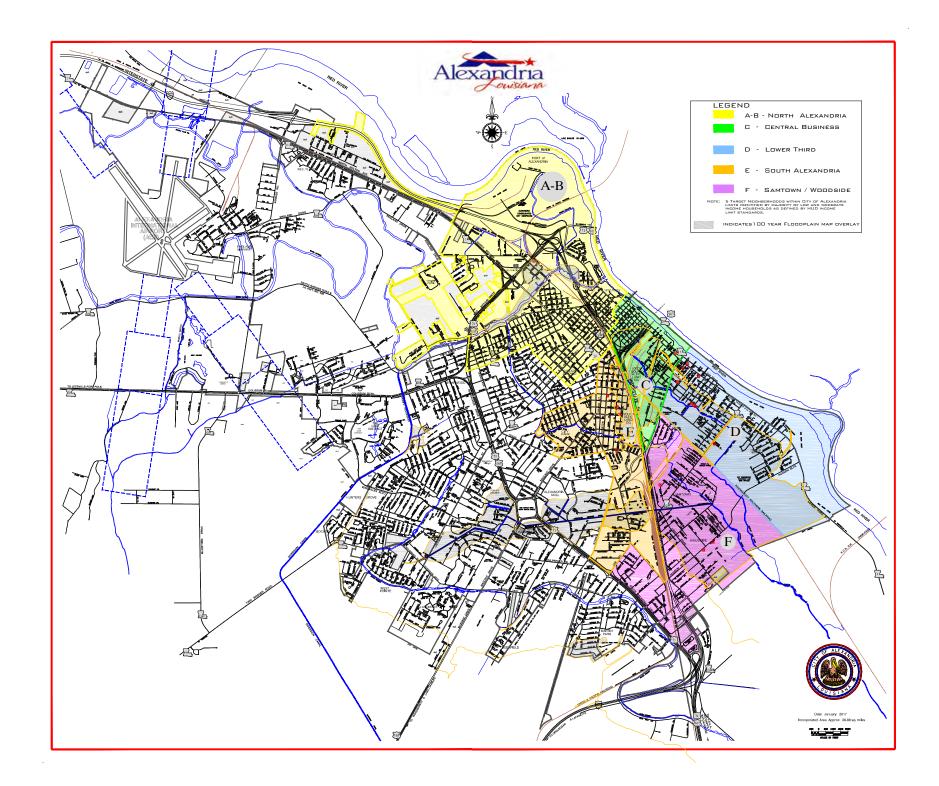
Attachments:

- 1. CDBG map indicating 100 year floodplain and houses proposed for demolition
- 2. List of proposed addresses to be demolished

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 September 1, 2017.

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





Community Development Department Planning Division, City of Alexandria 625 Murray Street, Alexandria, LA 71301 Office: 318.449.5072 / Fax: 318.449.5031 cda@cityofalex.com

Condemned Structures proposed for Demolition September 2017

Key	Street Address	Target Neighborhood	100 Year Floodplain
		Area	Status
1	2401 3 rd Street	С	Not in 100yr FP
2	2603 3 rd Street	D	Not in 100 yr FP
3	2641 8 th Street	D	In 100 yr FP
4	3108 9 th Street	D	In 100 yr FP
5	3110 9 th Street	D	In 100 yr FP
6	3112 9 th Street	D	In 100 yr FP
7	3208 Block Street	F	In 100 yr FP
8	1204 Fenner Street	E	In 100 yr FP
9	3008 Houston Street	E	Not in 100yr FP
10	3201 Hudson Boulevard	F	In 100 yr FP
11	3331 Hudson Boulevard	F	In 100 yr FP
12	311 John Thomas Street	D	Not in 100yr FP
13	314 Marye Court	D	Not in 100yr FP
14	2217 Overton Street	E	Not in 100yr FP
15	921 Railroad Avenue	А	In 100 yr FP
16	1203 Willow Glen River Road	D	In 100 yr FP
17	2327 Wise Street	E	In 100 yr FP

Map Legend: houses identified on map by red icon with number from chart above 100 year Floodplain identified on map by gray hatch

