U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

8-STEP DECISION-MAKING PROCESS

-- Huber Park in the City of Lake Charles, LA

The City of Lake Charles proposes to design and implement parking improvements to Huber Park.

--Decision-Making Process for E.O. 11988 and E.O. 13690 as Provided by 24 CFR §55.20

Step 1

Determine whether the action is located within the Federal Flood Risk Management Standard (FFRMS) floodplain using the Climate-Informed-Science-Approach (CISA) which applies the best-available, actionable, hydrologic and hydraulic data; the 0.2-Percent-Annual-Chance (500-Year) Flood Approach which uses the elevation and flood hazard area as depicted by the 0.2-Percent-Annual-Chance floodplain; or the Freeboard-Value-Approach (FVA) = Base-Flood-Elevation or 100-year floodplain (BFE+2' or BFE+3' for critical actions) to calculate the FFRMS floodplain elevation.

The City of Lake Charles, as Responsible Entity under Part 58 has determined that the following proposed action under Community Development Block Grant – Entitlement program and B-22-MC-22-0208/ B-23-MC-22-0208 is located in the Federal Flood Risk Management Standard (FFRMS) floodplain.

The City of Lake Charles proposes to use \$275,000.00 in CDBG-Entitlement funding to design and implement improvements to Huber Park located at 2401 4th Ave, Lake Charles, LA 70601. Improvements will include the addition of a new 38-space parking lot at the southwest corner of the property, relocating the existing playground to a different area on the property, and removing an existing open pavilion. There will be ground disturbance associated with the proposed improvements, but tree removal will not occur.

The extent of the FFRMS floodplain was determined using the freeboard value approach. According to flood insurance rate maps from FEMA's Map Service Center, the property is located within the unshaded X zone. The 500-year floodplain is not mapped for the area so the 0.2-percent-annual-chance floodplain approach was not appropriate to use. Per the freeboard value approach, the entire 14.5-acre park is within the FFRMS floodplain. The proposed parking lot will occupy approximately 0.30 acres of the FFRMS floodplain.

None of the exceptions at 55.12 or 55.13 apply, so the 8-step process is required, including an evaluation of direct and indirect impacts associated with construction, occupancy, and modification of the floodplain.

Step 2

Notify the public for early review of the proposal and involve the affected and interested public in the decision-making process.

A public notice was published in the Lake Charles American Press on March 6, 2025. The Lake Charles American Press is the local newspaper with the widest circulation in the area. This notice was also published on the City's website: cityoflakecharles.com. Public comments were accepted through March 24, 2025.

The notice included the project name, proposed location, and description of the activity; the related natural and beneficial functions and values of the floodplain or wetland that may be adversely affected by the proposed activity; and contact information. The notice included the hours of the City's office as well. Copies of the notices are included in the environmental review record.

No comments were received.

Step 3

Identify and evaluate practicable alternatives.

The proposed work is not anticipated to adversely impact the FFRMS floodplain, as the park will continue to offer floodplain benefits, including open space and recreational opportunities for the surrounding community. The addition of a new parking lot will offer increased parking capacity, making it easier for the community to access and enjoy the park. Relocating the existing playground to a quieter area, away from busy roads, will enhance safety for the children.

Evaluation of alternatives: A. Locate the Project Outside of the Floodplain

The proposed project involves improvements to an existing public park located at 2401 4th Ave, Lake Charles, LA 70601. This existing park is located within the FFRMS floodplain and is currently providing open space use benefits to the floodplain and recreational opportunities to the community. The planned improvements build upon the existing beneficial structures and components in the project area. In addition, the proposed parking lot and other improvements are specifically designed for this location, and attempting to find, procure, and plan similar improvements in a different area outside of the floodplain would not be practicable.

B. No Action or Alternative Actions that Serve the Same Purpose

A no-action alternative to the proposed project was also considered and rejected. The no-action alternative would forego an opportunity to enhance the services provided by the existing park. The existing park will remain underutilized, and children will remain at risk with the playground being located close to busy roads.

Step 4

Identify potential direct and indirect impacts associated with floodplain development.

The proposed project is located in a Unshaded Zone X, per FIRM Panel 22019C0480F, effective date 2/18/2011. Per the FFRMS Freeboard Value Approach (FVA) Report, the proposed project site is located in the coastal FFRMS floodplain. Applying the 2-foot freeboard per the Freeboard Value Approach, the FFRMS flood elevation is 11 FT NAVD88.

Floodplains are beneficial by providing natural moderation of floods, surface water quality maintenance, groundwater recharge, diverse wildlife habitat, cultural resources (archaeological, historic, and recreational), and agricultural, aquacultural, open space, and forestry resources. The proposed work is not anticipated to adversely impact the FFRMS floodplain, as the park will continue to offer floodplain benefits, including open space and recreational opportunities for the community.

No state- or federally listed threatened or endangered species will be impacted by the project (see ESA documentation). According to consultation with U.S. Fish and Wildlife Service's National Wetlands Inventory, wetlands do not occur near the project site.

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.

(a) Preserving Lives: The proposed action occurs within an existing public park and no adverse impacts to lives are anticipated.

(b) Preserving Property: The proposed action is for the addition of a parking lot. Elevating this facility is not feasible or appropriate. The parking lot is designed to direct stormwater runoff into two adjacent catch basins, allowing this area to quickly recover following a flood event.

(c) Preserving Natural Values and Minimizing Impacts: The proposed action is within an existing public park. The park preserves the natural values of the floodplain by offering open space and recreational opportunities.

Step 6 Reevaluate the alternatives The City of Lake Charles proposes to design and implement improvements to Huber Park. Improvements will include the addition of a new 38-space parking lot at the southwest corner of the property, relocating the existing playground to a different area on the property, and removing an existing pavilion. The park is within the Federal Flood Risk Management Standard (FFRMS) floodplain.

Constructing outside of the floodplain is not a viable alternative. The proposed parking lot is specifically designed for this location, and attempting to find, procure, and plan similar improvements in a different area outside of the floodplain would not be practicable.

The no action alternative is also impracticable because the existing park will remain underutilized, and children will remain at risk with the playground being located close to busy roads. In addition, the no action alternative was not selected since the current site improvements should not cause adverse impacts to lives, public property, or floodplain values.

Step 7

Determination of no practicable alternative and publication of final notice

The City of Lake Charles determines that there is no practicable alternative for locating the project within the FFRMS floodplain. This is due to: 1) the need to preserve the beneficial elements of the park for the recreational use by the community and the open space use for floodplain preservation 2) the need to construct an economically feasible and practicable project; and 3) no adverse impacts on human health, public property, and floodplain values.

A final notice will be published in accordance with 24 CFR 55, detailing the reasons why the modified project must be located within the floodplain, a list of alternatives considered, and all mitigation measures taken to minimize adverse impacts and preserve natural and beneficial floodplain values. This notice will also be published on the City's website: cityoflakecharles.com. Any substantive comments received during the comment period will be addressed.

Step 8

Implement the proposed action

The City will ensure that this plan, as modified and described above, is executed and includes language in all agreements with participating parties necessary to ensure implementation. The City will also take an active role in monitoring the construction process to ensure no unnecessary impacts occur nor unnecessary risks are taken.