

# U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

## 8-STEP DECISION-MAKING PROCESS

-- Jessie D. Clifton Park Improvements, City of Lake Charles, LA

The City of Lake Charles Recreation and Parks Department proposes utilizing CDBG-CV funds to make improvements to the Jessie D. Clifton Community Center and Park located at 2415 East Gieffers Street in Lake Charles, Louisiana.

--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 proposed action under the Community Development Block Grant CARES Act (CDBG-CV) program and B-20-MW-22-0004 is located in the Federal Flood Risk Management Standard (FFRMS) floodplain.

The City of Lake Charles Recreation and Parks Department proposes utilizing approximately \$629,000 in CDBG-CV funds to make improvements to the Jessie D. Clifton Community Center and Park. The proposed project location is 2415 East Gieffers Street in Lake Charles, Calcasieu Parish. The proposed site is approximately 3.68 acres and current proposed improvements include the installation of a putting green, the addition of an urban orchard, an educational garden, a rain garden, native/buffer plantings, a seeded meadow, the creation of concrete walking trails, and the relocation of two playgrounds to new areas within the park. The proposed project area is located within the FFRMS floodplain and currently provides open space and recreational uses for the surrounding community.

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 500-year floodplain (or '0.2-percent-annual-chance floodplain'). However, elevations are not available for the 500-year floodplain, and the freeboard value approach was utilized. Per the Federal Flood Standard Support Tool (FSST) FFRMS Freeboard Value Approach (FVA) Report, the property is located in the riverine FFRMS. The FFRMS flood elevation is 13 FT NAVD88.

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 November 20, 2024. 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 December 9, 2024.

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; the name of the Certifying Officer (Mayor of Lake Charles); and the phone number to call for 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 from the public were received during the public comment period.

## Step 3

***Identify and evaluate practicable alternatives.***

The proposed project involves improvements to an existing public park and community center located at 2415 East Gieffers Street in Lake Charles, Calcasieu Parish. The park is within the 500-year floodplain according to FEMA's Map Service Center and in the Federal Flood Risk Management Standard (FFRMS) floodplain per the FVA report. The City of Lake Charles identified and evaluated practicable alternatives to locating the action within the floodplain and the potential impacts on the floodplain from the proposed action, as required by Executive Order 11988, as amended by Executive Order 13690, in accordance with HUD regulations at 24 CFR 55.20 in Subpart C Procedures for Making Determinations on Floodplain Management and Protection of Wetlands.

Evaluation of alternatives:

### A. Locate the Project Outside of the Floodplain

The proposed project involves improvements to an existing public park located at 2415 East Gieffers Street in Lake Charles, LA. This existing park is already located within the FFRMS floodplain and is currently providing open space use benefits to the floodplain and recreational benefits to the community. The planned improvements build upon the existing beneficial structures

and components in the project area. Finding, procuring, and planning similar improvements in a different location outside of the floodplain would be costly and would forego an opportunity to enhance and the beneficial purposes of the public park and recreational open space at the existing location.

#### 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 and strengthen the benefits of the services provided by the existing park as well as the increased benefits that the additional open space use will provide for preserving the floodplain. The proposed project activities will extend the life of the park components thus extending the aforementioned benefits to the community and floodplain.

## Step 4

### ***Identify potential direct and indirect impacts associated with floodplain development.***

The proposed project is located in a Shaded Zone X, per FIRM Panel #22019C0485F, effective date 2/18/2011. According to the FEMA Flood Map Service Center, the floodplain elevation at the project site is 11 feet. Per the FFRMS Freeboard Value Approach (FVA) Report, the proposed project site is located in the riverine FFRMS floodplain. Therefore, any new building structures should be elevated to 13 FT NAVD88. No buildings are being proposed as a part of the improvements.

While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP).

In addition to concerns for life and property, the City considered the natural and beneficial values of the floodplain. The natural resources of the floodplain include water, biological, and societal resources.

The total proposed impervious area is 0.26 acres, which is for the construction of walking trails. This minimal new impervious surface in and adjacent to the floodplain will have minimal effects on water resources. Hydrologists and engineers will be consulted to design the site plan in such a way as to preserve natural flood and erosion control, water quality, and groundwater recharge.

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 improvements to an existing park; specifically, the installation of a putting green, the addition of an urban orchard, an educational garden, a rain garden, native/buffer plantings, a seeded meadow, the creation of concrete walking trails, and the relocation of two playgrounds to new areas within the park. Elevating or floodproofing these non-structural facilities is not feasible or appropriate.

(c) Preserving Natural Values and Minimizing Impacts: In addition to minimal new impervious surfaces in and adjacent to the floodplain, the project preserves the natural values of the floodplain by offering continued open space and recreational opportunities.

## Step 6

### ***Reevaluate the alternatives***

The proposed project involves improvements to an existing public park and community center located at 2415 East Gieffers Street in Lake Charles, LA. The park is within the 500-year floodplain according to FEMA's Map Service Center and in the Federal Flood Risk Management Standard (FFRMS) floodplain per the FVA report.

Construction outside of the floodplain is not viable due to the cost-prohibitive nature of locating and procuring an appropriate location for the project activities that also fulfills all of the City's criteria the intention of the project. The proposed site is the only location that satisfies the City's criteria for the project without being cost-prohibitive.

The no action alternative is also impracticable because it will forego an opportunity to enhance and extend the recreational benefits and open space use of the park components for the community and the floodplain. The no action alternative was not selected since the proposed site's impacts on human health, public property, and floodplain values can be mitigated and minimized.

## 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 project; and 3) the ability to mitigate and minimize 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](http://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.