

8-Step Floodplain Analysis

City of Grover Beach – CDBG Waterlines Project

Step 1: Determination of Floodplain

The proposed Grover Beach CDBG Waterlines project is an infrastructure project to replace/reconstruct existing underground waterlines in a number of locations throughout the City of Grover Beach. Two of the proposed sites, Mono Court and Owens Court, are located in the northeastern quadrant of the City off of Nacimiento Avenue. Nacimiento Avenue and both Mono Court and Owens Court are located in a Special Flood Hazard Area per FEMA maps in Flood Zone AE. Additionally, an approximate 100' stretch of waterline proposed to be replaced running northeast under Owens Court is located in the regulatory Floodway. The northeast end of Mono Court is at the edge of the Floodway and the waterline may extend a few feet into it. The proposed project, including Owens Court and Mono Court, will consist of the reconstruction of waterlines under the roadways and the reconstruction of the roadways afterwards. It has been determined that it is necessary to reconstruct the ageing and deficient waterline infrastructure servicing the neighborhood in order to adequately provide for the health and welfare of the community.

Per FEMA Flood Panel # 06079C1363F, with an Effective Date of 5/16/17, the area is located in Zone AE – Special Flood Hazard Areas With Base Flood Elevation or Depth Determined. Owens Court is approximately 31 feet in elevation and Mono Court is just under 33 feet in elevation.

Step 2: Early Public Review

An *Early Notice and Public Review of a Proposed Activity in a Floodplain* was published in the New Times on March 26, 2020 in order to facilitate early public review of the proposed project and inform the public that the site is located in a floodplain. The target group for the notice included persons, agencies and organizations in the City of Grover Beach. A copy of the published Notice is attached. The required 15 calendar days were allowed for public comment. As required by regulation, the notice also included the name, proposed location and description of the activity, total number of floodplain and wetland acres involved, and the responsible entity contact for information as well as a website and the location and hours of the office at which a full description of the proposed action can be viewed. No comments were received during the 15-day public comment period following publication.

Step 3: Identify and Evaluate Practicable Alternatives

The project is the replacement/reconstruction of aging and deficient city waterlines running underneath roadways in several areas of the City. Two of those roadways are located in Special Flood Hazard Zone AE. Three alternatives to replacing/reconstructing the project in its current proposed locations in the floodplain were considered: 1) *Alternative 1* – Replacing the waterlines located in the floodplain with above ground waterlines; 2) *Alternative 2* – Use the funds allocated to replace/reconstruct the waterlines located in the floodplain to replace/reconstruct waterlines in other locations in the City that are not located in the floodplain, and; 3) *Alternative 3* - the *No-Action Alternative or Alternative Actions that Serve the Same Purpose* - Not proceeding with the proposed project to replace/reconstruct the aging and deficient waterlines in the City.

Alternative 1 - Replacing the waterlines located in the floodplain with above ground waterlines. Within this Alternative, there are no practicable options with varying levels of impact to choose between as the waterlines that need replacing/reconstructing are already located within the floodplain and there are no alternative options that would be able to move them out of the floodplain and still serve the existing residences: Above ground waterlines would still need to be placed within the floodplain.

Therefore, *Alternative 1* was determined to not be a practicable alternative to replacing/reconstructing the waterlines as proposed.

Alternative 2 - Use the funds allocated to replace/reconstruct the waterlines located in the floodplain to replace/reconstruct waterlines in other locations in the City that are not located in the floodplain. These waterlines are included in the proposed project as they are among those that have been identified by the City as those most deficient and in need of replacement/reconstruction at this time.

Alternative 2 was not considered a practicable alternative to the proposed project's inclusion of these waterlines for replacement/reconstruction as any substituted waterlines would not be as deficient and in need of replacement/reconstruction.

Alternative 3 - The No-Action Alternative or Alternative Actions that Serve the Same Purpose - The *No-Action Alternative*, of not proceeding with the proposed project, would leave the existing waterlines in their current aged and deficient condition with the deficient condition being exacerbated over time. The *No-Action Alternative* was considered but is not considered a practicable alternative. The waterlines would continue to be substandard and would continue to age and deteriorate negatively affecting the health and welfare of the residents in an increasing degree over time, and there are no practicable *Alternative Actions that Serve the Same Purpose*. The *No-Action Alternative* was not considered a viable or practicable alternative.

Step 4: Potential Direct & Indirect Impacts of the Proposed Project on the Floodplain

The project is the reconstruction of waterlines at various locations throughout the City of Grover Beach, two of which are located in Zone AE, a Special Flood Hazard Area, and extend into the Floodway up to approximately 100'. The proposed improvements will be located below ground and below existing impervious surfaces. No additional impervious surfaces will be added as part of the project so as to preserve existing floodplain values. The project will not alter the surrounding grades and will have no impact on floodplain values following reconstruction.

There are not wetlands on or immediately adjacent to the project area. There are wetlands abutting the north property lines of the houses located at the end of Mono and Owens Courts. These wetlands will not be disturbed or impacted by the project as long as best management practices to control any storm water or other runoff from the project site during construction. The City will require the use of Best Management Practices and will specify conditions that must be complied with during construction including mitigations to ensure the site is cleaned of any loose dirt or debris after construction work ends each day and barriers to ensure that runoff from the site is unable to reach the wetland areas. The City will actively monitor implementation of these requirements during construction.

Additionally, the entire project site is covered with impervious surfaces and contain no biological resources that will be impacted by the project.

With implementation of City-required Conditions, construction of the proposed project will have no temporary or permanent increased direct or indirect impact on the floodplain or wetlands.

Step 5: Opportunities to Minimize, Restore, & Preserve

Substantial modifications to the project have been identified as not practicable. The project as proposed, with City-required Conditions discussed in Step 4, will result in no temporary or permanent direct or indirect impacts on the floodplain. Minimal ground disturbance is planned with the improvements being made as proposed and all sites will be restored to their original states following construction and the floodplain will be preserved in its current state with no impact on existing floodplain values. Following installation of the waterline improvements and restoration of the roadway surfaces, there will be no impact on the floodplain but the improvements will improve the quality of life and health and safety of residents in the project area.

Due to the nature of the project – a below-ground infrastructure project with no surface components – the City is not required to obtain flood insurance protection against potential loss due to damage from flooding, the City will otherwise comply with the regulations of the Federal Emergency Management

Agency (FEMA) found in 44 CFR Part 59-77.

Step 6: Reevaluate the Proposed Action

Reevaluation of the alternatives confirms that there is no practicable alternative to reconstructing waterlines as planned in the current proposed areas. The planned construction of the waterline improvements will not change the adjacent grades nor the water and drainage flow lines; therefore, the project will generate no increased effect on the floodplain.

Additionally, due to the nature of the need for the project – providing the reconstruction and replacement of necessary infrastructure to improve health and safety of project area residents and their quality of life – there is no practicable alternative to the proposed action being located in the floodplain and floodway.

Step 7: Determination of No Practicable Alternative

After reevaluating the proposed action and alternatives to the proposed action, the City has determined that there is no practicable alternative to locating the proposed project in a floodplain and floodway. The reason for finding these alternative actions not practicable are discussed above in Step 3.

- *Alternative 1* - Replacing the waterlines located in the floodplain with above ground waterlines.
- *Alternative 2* - Use the funds allocated to replace/reconstruct the waterlines located in the floodplain to replace/reconstruct waterlines in other locations in the City that are not located in the floodplain.
- *Alternative 3 - The No-Action Alternative or Alternative Actions that Serve the Same Purpose* - The *No Action Alternative*, of not proceeding with the proposed project, would leave the existing waterlines in their current aged and deficient condition with the deficient condition being exacerbated over time

The project, as proposed, will improve the overall quality of living and the health and safety of residents of the City by reconstructing aged, deficient and leaking water lines to provide cleaner water without contaminants introduced by the aged water lines.

A *Final Notice and Public Explanation of a Proposed Activity in a 100-Year Floodplain* was published in the New Times on _____, 2020 containing the City's Determination of no practicable alternative and the City's explanation for reaching this determination. The Notice is attached to this document. No concerns were expressed by the public concerning this Notice.

Step 8: Implement the Proposed Action

As the City has determined that there is no practicable alternative to implementing the proposed project in the floodplain and floodway and the proposed project will have no permanent direct or indirect impacts to the floodplain or floodway, the project will be implemented as proposed following best management practices during implementation. The City will assure that this plan, as described above, is executed and necessary language will be included in all agreements with participating parties. The City will also take an active role in monitoring the construction process to ensure no unnecessary impacts occur nor unnecessary risks are taken and that the floodplain and floodway are restored to function with their preconstruction floodplain values.