

**U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT:**  
**8-STEP PROCESS - FLOODPLAINS**

**Project Name:** Brownwood CDV21-0070-EA-Sewer  
**State/Local Identifier:** CDV21-0070

**Description of Aggregated Project (must include work to be funded by TxCDBG):**  
**Sewer Improvements:**

Replace and trout the sewer collection and manholes in the Valley/San Jacinto neighborhood via open trench.

- Install approximately 700 lf of 6" SDR-35 PVC sewer line
- Install approximately 755 lf of 8" SDR-35 PVC sewer line
- 7 manholes
- Reconnections
- Pavement repair
- Associated appurtenances

**Water Improvements:**

Provide looping of existing dead-end water lines.

- Install approximately 390 lf of 2" DR-17 PVC water line
- Install approximately 560 lf of 6" DR-18 C900 PVC water line

**Acquisition**

None

Professional Services including Grant Administrator and Project Engineer activities.

**LOCATION:**

All work will occur in the City of Brownwood, Brown County, Texas in the following locations:

**6" Sewer Improvements:**

- Alley between Sharp & Malone from N Washington St To Valley St

**8" Sewer Improvements:**

- San Jacinto St from alley between Baker and Malone to Malone St
- Malone St from San Jacinto St to Valley St
- Valley St from Malone St to Sharp St

**6" Water Line Improvements:**

- E Baker St from San Jacinto St to approximately 110 lf nw of San Jacinto St
- San Jacinto St from E Baker St to Malone St

**8" Water Line Improvements:**

- Valley St from Malone St to Sharp St
- Sharp St from Valley St to San Jacinto St

### **Alternative project activities if funds allow:**

Extend water line on Baker to Washington and on San Jacinto to Sharp; install 8" water line on Malone (Washington to Valley); Install sewer collection line in alley between Baker/Malone (Washington/San Jacinto); Install water line on Sharp and Milton from San Jacinto to Washington; install additional hydrants and valves in Area.

- E Baker St. from S. Washington St. southeast 275'
- Alley between E Baker St. and Malone St from S Washington to San Jacinto St
- San Jacinto St. from Malone St to Sharp St.
- Sharp St from 30' southeast of San Jacinto St northwest 75'
- Milton Ave from Sharp St. to N Washington St

### **Step 1: *Determine whether the action is located in a 100-year floodplain (or a 500-year floodplain for critical actions).***

According to FEMA Map #48049C0378E (effective date 8/28/28), a portion of the project will occur within Zone AE (subject to flooding by the base or 1% annual chance flood (100- year flood):

Water and Sewer Line:

- Valley Street from Malone St. to Sharp Street
- Sharp St. from Valley Street to San Jacinto Street
- ROW between Malone St. and Sharp St. from Valley St northwest 500'
- Malone St from Valley St to San Jacinto St
- San Jacinto St. from Sharp St to ROW between Baker St. and Malone St.

Area of Disturbance: 0.17 acres.

### **Step 2: *Notify the public for early review of the proposal and involve the affected and interested public in the decision-making process.***

There is a designated floodplain associated with the proposed project sites. An early floodplain notice was published regarding the project, affording the opportunity for public input. No comments were received.

Publication Date: October 5, 2023

### **Step 3: *Identify and evaluate practicable alternatives.***

The City project site selection criteria are:

- (a) The project cannot cause current residents to become displaced;
- (b) The project must be within the City in order for grant proceeds to be used;
- (c) The project must benefit low-to-moderate income people as required by HUD.

The City considered several alternative sites and actions:

1. **Complete work outside the floodplain.** – It is not possible to locate the project outside of the floodplain as many of the customers served by the water and sewer systems are located within the floodplain.
2. **Obtain a Letter of Map Amendment (LOMA) or Letter of Map Revision (LOMR).** - A LOMA was considered, but it was determined that there is insufficient time to apply and the locations are not good candidates
3. **Other infrastructure considered.** - Other infrastructure projects were also considered within the City Jurisdictional limits. However, the City concluded that this project was the highest priority of any eligible projects.
4. **No Action or Alternative Actions that Serve the Same Purpose.** - A no-action alternative was considered but the City's water and sewer systems are not functioning properly which could pose a health hazard to the community.

### **Step 4: *Identify Potential Direct and Indirect Impacts of Associated with Floodplain Development.***

1. A flood could damage the new proposed infrastructure. However, such damage is not anticipated as flooding of the magnitude necessary to damage the new infrastructure is unlikely to occur.
2. In addition to concerns for life and property, the City has considered the natural values of the floodplain. The natural resources of the floodplain include water, biological, and societal resources. The proposed project will have minimal impacts to the floodplain as the project involves minimal ground disturbance within the floodplain.
3. After consultation with the USFWS, review of the County Lists of Endangered and Threatened Species for the County and on-site inspections of the project site, it was concluded that the construction of the facilities will have no quantifiable impact on plant and animal life. Only native plants are to be used in the floodplain and on the site.
4. Societal resources should also be considered during the design process. The designs are meant to complement the natural features of the area and to offer an aesthetically pleasing structure. The site will not have an effect on agricultural lands.

**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.***

1. Preserving Property: Project designs should, to the best extent possible, incorporate measures to reduce the risk of damage to the new infrastructure via a flood.
2. Preserving Natural Values and Minimizing Impacts: After construction is completed, disturbed areas will need to be immediately re-vegetated with native grasses. Only native plants are to be used in the floodplain and on the site.
3. Deposition and excavation of materials will need to be performed in such a manner that erosion and sedimentation will be controlled.
4. Precautions will need to be taken in handling of fuels or other hazardous materials to prevent discharge or spillage resulting in lower groundwater quality.
5. Erosion control measures such as hay bales or silt screen barriers will need to be implemented and maintained during construction as required.
6. The project engineer will need to incorporate best management practices into the specifications and plans.

**Step 6: *Reevaluate the Alternatives.***

1. **Complete work outside the floodplain.** - Because many customers served by the water and sewer systems are located within the floodplain, it is not possible to complete this project outside the floodplain. (not viable)
2. **Obtain a Letter of Map Amendment (LOMA) or Letter of Map Revision (LOMR).** - The locations in concern are in areas unlikely to qualify for a LOMA and there is insufficient time to apply for a LOMA. (not viable)
3. **Other infrastructure considered.** - While there is other infrastructure in the City that needs to be addressed, the City concluded that the chosen infrastructure in this project was the highest priority. (not viable)
4. **No Action or Alternative Actions that Serve the Same Purpose.** - If this project is not completed, the water and sewer systems will continue to be inadequate, which could pose a health threat to the community. (not viable).

### **Step 7: *Determination of No Practicable Alternative***

It is our determination that there are no practical alternatives for locating the project in the floodplain.

A final notice was published detailing the reasons why the project must be located in the floodplain, a list of *alternatives* considered, and all mitigation measures taken to minimize adverse impacts and preserve natural and beneficial floodplain values. No concerns were expressed by the public concerning this notice.

Publication Date: 10/26/23

### **Step 8: *Implement the Proposed Action***

The City will assure that this plan, as modified and 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.