U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT:

8-STEP PROCESS - FLOODPLAIN

Project Name: Hardin Co MIT MOD - StreetDrainage - Kountze
State/Local Identifier: 24-065-065-E596 / B-18-DP-48-0002

Project Location:
All work will occur in the City of Kountz, Hardin County, Texas in the following locations:

Roadside Ditch Improvements

- 1ST STREET from Blackgum St. to 450' west of N. Cherry St.
- 2ND STREET from N. Oak St. to 110' west of N. Cherry St.
- 3RD STREET from N. Oak St. to 110' west of N Cherry St.
- 4TH STREET from Blackgum St. to 90' west of N Cherry St.
- ROW on north side of ALLEN ST from Tubb St. to Feagin St.
- ALLUMS STREET from Old FM 418 to 170' west of N. Cherry St.
- N. ASH STREET from 1st St. to Hwy 418 W
- S. ASH STREET from Deer St. to E Brown St.
- ROW ON NORTH SIDE OF BARRET STREET from Feagin St. to Villa Rd
- N. BEECH STREET from Hwy 418 W to 1st St.
- S. BEECH STREET from E Deer St. to E Brown St
- BEAR STREET from Old FM 418 to 180' west of N. Cherry St.
- BLACKGUM STREET from 1st St. to 2,914' northwest
- E. BROWN STREET southernmost section from the E Brown Street Fork east 1,132' to end
- E. BROWN STREET from Alums St. to 170' west of N. Cherry St.
- CARIKER STREET from Otis St. to Allen St.
- ROW ON NORTH SIDE OF CHARLES STREET from Allison St. to Riggs St.
- N. CHERRY STREET from 2nd t. to 3rd St.
- N. CHERRY STREET from 3rd St. to Hwy 418 W
- S. CHERRY STREET from E Brown St. to E Deer St.
- CYPRESS STREET from 1st St. to 230' north of 4th St.
- CYPRESS STREET from Bear St. to Deer St.
- CYPRESS STREET from Deer St. north 537'
- ROW NORTH OF DALE STREET from Tubb St. to Villa Rd.
- DEER STREET from Old FM 418 to 190' west of S. Cherry St.
- FEAGIN STREET from 40' north of Allen St. to Tubb St.
- FOX STREET from Old FM 418 to 215' west of N. Cherry St.
- KIMBERLY LANE from E. Williford Rd. north 359' to end
- ROW NORTH OF LINDSEY STREET from Feagin St. to Tubb St.
- ROW NORTH OF M.L. KING STREET from Pan-Am Rd. to Villa Rd.
- MARSHALL STREET from 50' north of Allen St. to 918' south
- MILL STREET from E Brown St. to 170' west of N. Cherry St.
- S. OAK STREET from E. Brown St. to Deer St.

- N. OAK STREET from 2nd St. to 1st St
- N. OAK STREET from Hwy 418 W to 3rd St.
- OLD FM 418 from Allums St. to Deer St.
- ROW NORTH OF OTIS STREET from Feagin St. to Tubb St.
- ROW ON EAST OF PAN-AM ROAD from M.L. King St. to 40' north of Dale St.
- ROW ON EAST SIDE OF RIGGS STREET from Charles St. to 75' north of Barrett St.
- ROW N OF SMITH STREET from Feagin St. to Tubb St.
- ROW NORTH OF TIGER STREET east 470' then north on Tiger St. 270' to end
- TUBB ST from Allison St. to Allen St.
- ROW NORTH OF E. VANDERBURG STREET from Villa Rd. to Feagin St.
- E. VANDERBURG STREET from Feagin St. to Tubb St.
- VILLA ROAD from Rocky Richardson Rd. south 3,558'
- N. WALNUT STREET from 1st St. to 160' north of 4th St.
- S. WALNUT STREET from Deer St. to E Brown St.
- WALTERS LANE from E Williford Rd north 800'
- WIGGINS STREET from Feagin St. to Tubb St.
- E. WILLIFORD from Wallers Ln. to Hwy 287

Channel Improvements

- ROW ON EAST SIDE OF E BROWN ST. from E. Williford Rd (30.37047, -94.30961) northeast 5,248' (30.37716, -94.29661)
- ROW ON THE EAST SIDE OF CHILE DANIEL ROAD and 1,300' North of Hwy 418 W (30.38409, -94.31148) to south to Hwy 418 W (30.38136, -94.31135)
- ROW ON THE EAST SIDE OF CHILE DANIEL ROAD and 1,300' North of Hwy 418 (30.38409, -94.31148) to southwest 1,044 l.f. to Villa Rd (30.38282, -94.31442)
- ROW ON NORTH SIDE OF DALE ST. from the intersection of Feagin St and Dale St. southeast to the west side of Chile Daniel Rd.and 1,300' North of Hwy 418 W (30.38409, -94.31148)
- ROW 70' EAST OF THE EASTERN END OF TIGER ST (30.37675, -94.30692) southeast 1,241' (30.37574, -94.30339)
- ROW 100' SOUTH OF THE INTERSECTION OF SMITH ST AND FEGIN ST. southeast to Barret St. 115' east of the intersection of Riggs St. and Barrett St. (30.38985, -94.31712)

Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]**:**
Provide Roadside Ditch and Channel Improvements. Construction activities include:

- Driveway Culvert Replacements - 3,000 LF
- Roadside Ditch Excavation - 122,000 LF
- Channel Clearing and Shaping - 14,100 LF

Step 1: ***Determine whether the action is located in a Federal Flood Risk Management Standard (FFRMS) floodplain.***

Exemptions to Part 55:
Actions listed in the revised 24 CFR 55.12 that are exempt from the floodplain management requirements of Part 55 include:

- *Exempt activities and actions that are Categorically Excluded Not Subject to 50.4 or 58.5*
- *Restoration or preservation of floodplains, acquisition of floodplains property provided the site is used for flood control or open space but only if structures are cleared and improvements are specifically limited*
- *Receivership or foreclosure and related actions*
- *Policy-level actions not involving site-based work*
- *Issuance of non-project-based housing vouchers*
- *A minor amendment to a previously approved action*

The project is subject to Part 55 because it meets the criteria for none of the exemptions,

---

Critical Actions:
Critical action means any activity for which even a slight chance of flooding would be too great because such flooding might result in loss of life, injury to persons, or damage to property. Critical actions include activities that create, maintain, or extend the useful life of those structures or facilities that:

- *Produce, use, or store highly volatile, flammable, explosive, toxic, or water-reactive materials*
- *Provide essential and irreplaceable records or utility or emergency services that may become lost or inoperative during flood and storm events (e.g., community stormwater management infrastructure, water treatment plants, data storage centers, generating plants, principal utility lines, emergency operations centers including fire and police stations, and roadways providing sole egress from flood-prone areas)*
- *Are likely to contain occupants who may not be sufficiently mobile to avoid loss of life or injury during flood or storm events, e.g., persons who reside in hospitals, nursing homes, convalescent homes, intermediate care facilities, board and care facilities, and retirement service centers; housing for independent living for the elderly is not considered a critical action*

Because the project meets none of this criteria, it is not considered a critical action.

How Federal Flood Risk Management Standard (FFRMS) was determined:
The FFRMS is determined by utilizing a tiered approach:

- *Climate-Informed Science Approach (CISA) -* ***Preferred Method***
- *0.2-Percent-Annual Chance Floodplain Approach (0.2PFA)*
- *Freeboard Value Approach (FVA)*

Climate-Informed Science Approach (CISA)

- *Federal CISA data must be equal to or greater than base flood elevation (BFE) to be used.*

According to the Federal Flood Standard Support Tool (FFSST), there is no CISA data available for the project area. As such, this approach could not provide a determination as to whether the project was in the FFRMS floodplain. The next tiered approach, 0.2PFA (500-year floodplain method), was therefore considered.

FEMA 0.2PFA (500-year floodplain)

- *FEMA maps must show a 500-year floodplain in order to be used*
- *Critical Actions require both the 0.2PFA and the Freeboard Value Approach (FVA) be used to determine which elevation is higher, the 0.2PFA or FVA.*

According to FEMA floodplain map #4899C0225F (Effective Date 10/06/10), a portion of the project is located within a 100-year floodplain which is considered a FFRMS floodplain:

- ROW ON EAST SIDE OF E BROWN ST. from E. Williford Rd (30.37047, -94.30961) northeast 5,248' (30.37716, -94.29661)

Since a 100-year floodplain is considered a FFRMS floodplain, it was determined that this portion of the project is located within the FFRMS floodplain. The 8-step process is required.

According to FEMA floodplain map #4899C0225F (Effective Date 10/06/10) and #48199C0375F (Effective Date 10/6/10), the majority of the project is located in Zone X (Area of Minimal Flood Hazard) which is not considered a FFRMS floodplain.

In order to ensure that all appropriate FEMA floodplain data was considered and the most stringent data source was used for the comparable flood data, all available effective, preliminary and pending FIRMS were reviewed:

- Effective Maps - 7
- Preliminary Maps - 0
- Pending Maps - 0

Upon completion of this review, it was discovered that there was no additional data that would change the FFRMS floodplain determination. Further, since none of the maps showed the 500-year floodplain, this approach could not provide a determination as to whether the project was

in the FFRMS floodplain. The next tiered approach, Freeboard Value Approach (FVA), was therefore considered.

Freeboard Value Approach (FVA):

FVA defines the FFRMS floodplain as the elevation and flood hazard area that results from:

1. *Adding two (2) feet to the base flood elevation (BFE)* ***for non-critical actions*** *or*
2. *Adding three (3) feet to the BFE* ***for critical actions.***

This approach is used for noncritical actions if neither CISA data nor FEMA-mapped 0.2-percent-annual-chance floodplain data is available or actionable. ***For critical actions, the higher of 0.2PFA or FVA must be used.***

According to the FEMA Floodplain Base Elevation Mapper, the following Floodplain Base Elevations were determined:

- Base floodplain elevation (BFE) 83.558 feet.

Since the project is not a critical action, and the FVA requires the highest Floodplain Base elevation be used, the FFRMS floodplain was determined to be BFE 83.558 + 2 feet:

- FFRMS Floodplain = 85.558’

According to the USGS Topo builder, the entire project is located at a lower elevation than the FFRMS floodplain. As such, it was determined that the entire project is located within FFRMS floodplain.

Area of disturbance:

- Drainage Channel Improvements – 8.35 acres at a depth of 4’ (ft)
- Roadside Ditches – 21.11 acres at a depth of 3’ (ft)

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

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

Posting Date: 5/6/25

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 address infrastructure which was damaged due to recent flooding.

The City considered several alternative sites and actions:

1. **Do work only outside the floodplain.** It is not possible to complete work without disturbing the floodplain.

2. **Obtain a Letter of Map Amendment (LOMA) or Letter of Map Revision (LOMR**). - The County also considered applying for a LOMA Map Amendment or Letter of Map Revision but it was determined that this site would not be a good candidate for such action and the time required to request such action could not be justified.

3. **Other infrastructure considered. -** Other infrastructure projects were also considered within the County Jurisdictional limits. However, the County 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 storm drainage system is currently 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. Preventing loss of life and property as a result of flooding is the highest priority. Another flood could damage the new infrastructure.
2. In addition to concerns for life and property, the County 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 because appropriate mitigation will be in place.
3. According to a Threatened and Endangered Species Assessment, 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.***

Mitigation Requirements:
CFR 55.20 (e)(1):
For actions in the FFRMS floodplain, the required elevation described in this section must be documented on an Elevation Certificate or a Floodproofing Certificate in the Environmental Review Record prior to construction, or by such other means as HUD may from time to time direct, provided that notwithstanding any language to the contrary, the minimum elevation or floodproofing requirement for new construction or substantial improvement actions shall be the elevation of the FFRMS floodplain as defined in this section.

Non-Critical Actions
CFR 55.7(d)(1):

- The FFRMS floodplain includes those areas that result from adding an additional two feet to the base flood elevation based on best available information.

Critical Actions
CFR 55.7(d)(2):

- The FFRMS floodplain includes those areas that result from adding an additional three feet to the base flood elevation based on best available information.

Applicable Projects
According to the HUD Exchange on Floodplain Management (Complying with 24 CFR Part 55 (2)), if a project involves new construction or substantial improvement, elevation requirements apply.

Substantial Improvement:
A substantial improvement is any repair, reconstruction, modernization or improvement of a structure, including one of the following:

1. The cost of which equals or exceeds 50 percent of the market value of the structure either before the improvement or repair is started, or, if the structure has been damaged and is being restored, before the damage occurred
2. That results in an increase of more than 20 percent in the number of dwelling units in a residential project or in the average peak number of customers and employees likely to be on-site at any one time for a commercial or industrial project

Certain types of projects are specifically not considered substantial improvement under Part 55.

- Any project solely for improvement of a structure to comply with existing state or local health, sanitary or safety code specifications that is solely necessary to assure safe living conditions
- Any alteration of a structure listed on the National Register of Historical Places or on a State Inventory of Historic Places
- Structural repairs, reconstruction, or improvements not meeting the definition for substantial improvement are considered "minor improvements."

Because the project does not involve new construction of a structure, elevation requirements do not apply.

Mitigation Measures:

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, the disturbed area 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 the 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. **Do work only outside the floodplains.** Completing the project without disturbing any floodplain is not possible. (Not Viable)

2. **Obtain a Letter of Map Amendment (LOMA) or Letter of Map Revision (LOMR**). - It was determined that neither a LOMA nor a LOMR was likely nor practical for the project area. (Not Viable)

3. **Other infrastructure considered. -** After considering other potential projects in the County, it was determined that of the eligible projects, this project was of the highest priority. (Not Viable)

4. **No Action or Alternative Actions that Serve the Same Purpose. -** The current storm drainage system in the project area are inadequate and must be addressed to prevent public health hazards. (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 posted 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.

Posting Date: 7/24/25

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

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