

8-STEP PROCESS NORTHEAST PARKING LOT

Greenwood Indiana

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

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

This action is located in a 100-year floodplain and a 500-year floodplain. One building on the proposed project site is partially located within AE Zone (area of special flood hazard with water surface elevations determined) as indicated on Flood Insurance Rate Map (FIRM) 18081C0038E, effective 129/21. The FIRM is attached to this document.

The proposed project will install a new parking lot near the shelter of Northeast Park, creating an entrance for cars on the park's north side. Portions of the parking pass through the AE Zone. This project does not meet any exceptions at 24 CFR 55.12 and, therefore, requires an 8-step analysis of the direct and indirect impacts associated with the construction, occupancy, and modification of the floodplain and wetland.

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

Greenwood published a public notice describing the project on November 8, 2024, and posted a copy on its website. The required 15 calendar days were allowed for public comment. As required by regulation, the notice included the name, proposed location and description of the activity, the 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 residents can view a full description of the proposed action.

Step 3: *Identify and evaluate practicable alternatives.*

The City of Greenwood project site selection criteria are:

- (a) The project can not cause current residents to become displaced;
- (b) The project must be within a park that serves a low to moderate income areas as defined by HUD;
- (c) Fit within the rules of the City of Greenwood Flood Hazard Overlay District Ordinance; and
- (d) Fit within the City's allocation of \$350,000.

Greenwood considered several alternative sites and actions believed to satisfy these requirements:

A. Move the entire parking lot outside the Floodplain

The City considered an alternative route around the floodplain, but it is limited because the northern access, Crestview, is entirely in the said floodplain. Other parts of the park border residential properties and limit the choice of areas for entrances to the park. The estimated cost of moving the parking lot would be \$500,000.

The City of Greenwood has a Flood Hazard Overlay Ordinance that requires flood hazard management and planning before any installation of non-permeable surfaces for parking. Even moving the project out of the FRMS flood plain would not exempt this project from the City Ordinance and flood hazard design.

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

Greenwood considered and rejected a no-action alternative because a recent study found the park had no history of improvements until the City began its CDBG program. The proposed project is one of the steps in a five-year improvement plan.

Step 4: *Identify any Adverse and Beneficial Impacts.*

Locating the parking lot near the shelter is a response to the surrounding neighborhood and school to locate some on-site parking, eliminating street parking or parking within the school parking lot. Parking in the school lot often interferes with classes and the flow of buses from the school.

Step 5: *Mitigate Impacts.*

The City hired an architecture firm offered to provide survey, landscape design, civil engineering, floodplain permitting, Earthmoving and Erosion Control applications, and electrical permitting for the parking lot. The revised schematics have been attached to this document.

The City will utilize an underground stormwater detention system including an aqua swirl structure to detain all water on site and improve water quality. Key features include:

- a. The underground chamber system will be sufficient to retain all stormwater from the new impervious structure and release water at a rate that meets all local, state, and federal standards.
- b. The aqua swirl structure is a permanent flow-through water quality device designed to remove coarse sediment, debris and free-floating oil by utilizing hydrodynamic separation technology. It is recognized as a Best Management Practice for Stormwater quality improvement

Step 6: *Reevaluate the Alternatives.*

Upon review, Greenwood determined the alternatives are to move the parking lot to an area outside the floodplain or not have the parking lot exist.

Moving the parking lot outside the floodplain is not financially feasible, would impede existing recreational space and create logistical accessibility challenges for shelter and lavatory facilities. The City determined the proposed location following a master plan for the park, considering the proximity to the new, accessible shelter and bathroom facilities and existing infrastructure for the roads to the proposed parking lot. Additional road development or extension of existing roads would significantly exceed the available budget.

The no-action alternative is impractical; it will not satisfy the need to improve the local park for low-to-moderate-income residents in the community. A dearth of parking at the park is causing overflow at a nearby school, disrupting the flow of buses and traffic and limiting staff parking. Expansion of park parking is necessary to ensure park patrons do not encroach on school parking, private property, or limited street parking.

Step 7: *Determination of No Practicable Alternative*

It is the City of Greenwood's determination that there is no practicable alternative for partially locating the project in the flood zone. This is due to:

1. the project serves the local neighborhood, which meets the HUD criteria for a low to moderate income;
2. the desire to create park improvements in a park that has not had any improvements since 2011; and
3. the site's connection between the local neighborhood and the neighborhood elementary school.

A final notice was published and posted consistent with the prior notice. The notice explains why the modified project must be located in the floodplain, offers a list of alternatives considered at Steps 3 and 6, and describes all mitigation measures taken at Step 5 to minimize adverse impacts and preserve natural and beneficial floodplain values. The notice is attached to this document. The public expressed no concerns concerning this notice.

Step 8: *Implement the Proposed Action*

Greenwood will ensure that this plan, as modified and described above, is executed and that 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 or unnecessary risks are taken.