

2017 – 2018

**ENVIRONMENTAL REVIEW RECORD
FLOODPLAIN INVESTIGATION**

Prepared by:

Community and Economic Development Department
Dearborn Heights, Michigan

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Prepared by:

**Community and Economic Development Department
City of Dearborn Heights, Michigan**

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With assistance from:

Wade-Trim

ACKNOWLEDGMENTS

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TABLE OF CONTENTS

Acknowledgments	1
Table of Contents	2
Introduction	3
Analysis	4
Part I: Alternatives	
Alternative Sites	
Alternative Actions	
No Action	
Part II: Adverse Impacts	
Part III: Public Hearing	
Floodplain Values	8

Appendix

Appendix 1	Public Hearing Notice and Minutes
Appendix 2	Agency Contact and Comments
Appendix 3	Issuance of Findings Statement, Public Hearing Notice
Appendix 4	Action Plan Projects Map
Appendix 5	Environmental Assessment Matrix

INTRODUCTION

Pursuant to the procedures for floodplain management and the protection of wetlands specified in Executive Orders 11988 and 11990, the City of Dearborn Heights is considering funding, with **2017-2018** Community Development Block Grant (CDBG) funds, project(s) with potential locations within the 100-year floodplain. The City shall consider alternatives to avoid adverse effects and incompatible development in the floodplains.

Prior to taking action the City shall, (1) design or modify its action in order to minimize potential harm to or within the floodplain, consistent with regulations, and (2) prepare and circulate a notice containing an explanation of why the action is proposed to be located in the floodplain.

As well, the City of Dearborn Heights, Michigan is required by Executive Orders 11988 and 11990, Floodplain Management and Protection of Wetland regulations, to complete an assessment of the effects of proposed CDBG projects on the environment within the 100-year floodplain. The City of Dearborn Heights will receive comments pertaining to concerns or practical alternatives to said proposed projects.

The projects under consideration are:

Housing Rehabilitation

The purpose of this City-wide program is to provide no interest loans to income eligible homeowners throughout the City for housing rehabilitation activities where the cost of rehabilitation is less than 50 percent of the current market value of the home. The City will be contributing **\$360,108** of the **FY 2017/2018** CDBG allocation to this program. The location of this project is City-wide.

Code Enforcement

This service provides funding to provide code enforcement inspections within areas of low and moderate income. This service will be provided in low and moderate income areas that may fall within the 100-Year Floodplain. This project is not subject to floodplain review pursuant to 24 CFR 55.12(c)(1) and therefore does not need to follow the decision making process in 24 CFR 55.20. The City will be contributing **\$75,000** of the **FY 2017/18** CDBG allocation to this program.

Watermain Replacement

The City's CDBG program is providing partial funding for water main replacement in a low/moderate income area in the south end of the City. The selected section of watermain to be replaced is along Annapolis Avenue from Polk Avenue to Williams Avenue. The estimated total project cost is \$530,000. This includes design, engineering, construction,

administration and construction costs. The City will contribute **\$250,000.00** of the **FY 2017/18 CDBG** allocation to this project.

ANALYSIS

Part I: Alternatives

The initial component used in this analysis is the identification and evaluation of practicable alternatives to locating in the floodplain. The alternatives include carrying out the proposed actions at alternative sites, identifying alternative means that could possibly accomplish the same purposes of the proposed actions, and no action.

Alternative Sites

The City must evaluate whether or not these activities can occur on “flood-free” sites, or if necessary in a flood prone area, and then select the site having the least risk or environmental impact.

In determining the practicality of an alternative non-floodplain site, the general concepts of “site feasibility” were applied, in accordance with the Floodplain Management Guidelines for implementing Executive Order 11988 issued by the Water Resource Council in 1978. Pursuant to U. S. Department of Housing and Urban Development (HUD) program guidelines, the City’s entitlement allocation can only be spent to: serve low and moderate income persons; meet other community development needs having a particular urgency (i.e., existing conditions pose a serious threat to health or welfare of the community); and aid in the prevention or elimination of slums and blight (refer to 24 CFR 570.200(a) (2)). HUD has identified low and moderate income areas in the community where CDBG monies may be expended. These CDBG eligible areas are displayed on the Action Plan Projects Map (**Appendix 4**).

Housing Rehabilitation

The City of Dearborn Heights offers low and moderate-income homeowners the ability to reside in a safe and sanitary home by accessing Housing Rehabilitation dollars. This program is available citywide. As homeowners seek funding from the CEDD, non-floodplain projects will take priority. The City will require that homes located within the floodplain carry the necessary insurance and fully comply with the requirements of 24 CFR 58.5 and 58.6. As well, homeowners within the floodplain will receive limited assistance based on the SEV of the property.

The City could seek to lessen the amount of rehabilitation projects or to avoid assisting homes that are in the floodplain. These options are not acceptable, as it would be detrimental for a large segment of the community that is located within the affected areas. The housing rehabilitation program ensures that low and moderate-income homeowners are able to maintain property values due to the availability of financial assistance. Many of these homeowners would not be able to obtain assistance at a reasonable interest rate.

The substantially older age of the City's housing stock suggests that programs for housing rehabilitation and lead safety are warranted citywide. As a general rule, major housing maintenance and repair is required every 30 years. For example, roofs, windows and even mechanical equipment need to be replaced within 20 to 30 years after a housing structure is originally built.

Approximately, 98% of the housing stock was built prior to 1970. The older housing stock creates a serious maintenance issue for the community. A vast majority of Dearborn Heights' housing requires maintenance having gone through one or more housing maintenance cycles. Additionally, over 90% of the Dearborn Heights' housing stock is at risk of having lead-based paint; this poses a potential hazard to children under the age of 6.

In addition, the City's Housing Rehabilitation Program is an ongoing effort to improve the aging housing supply throughout the City's low and moderate income areas. For this reason, the justification of rehabilitating homes within the flood plain is justified. The proposed project does not call for the development of new homes, but instead the rehabilitating of existing homes within the 100-year floodplain.

Water Main Replacement

The City of Dearborn Heights plans to complete water main replacement activities in a low and moderate income neighborhood. The selected section of water main to be replaced is along Annapolis Avenue from Polk Avenue to Williams Ave. The water main size is 8-inches and will consist of 2,100 linear feet of new main.

The City could refrain from water main improvement projects or to avoid assisting neighborhoods that are in the floodplain. These options are not acceptable, as it would be detrimental for a large segment of the community that is located within the affected areas. Aging water mains within the City have become more and more of a problem for the community. Water main breaks are common which result in unnecessary costs to both homeowners and the City. This section of water main has experienced 10 water main repairs since 2005. The frequency of repairs is due to the age of the watermain estimated to be 70 years. It is planned to use the pipe bursting technique of construction to run the new water main through the existing water main located between the curb and sidewalk on the north side of Annapolis Avenue.

In addition, the water main replacement is an ongoing effort to improve the aging infrastructure of the City and better protect the homes of persons in low and moderate income areas. For this reason, the justification of water main replacement within the flood plain is justified. The proposed project does not call for the development of new non-existing lines, but instead the replacement of existing lines within the 100-year floodplain.

Alternative Actions

Alternative actions must also be considered. These are actions which substitute for the proposed actions, in that they comprise new solutions or approaches which serve the same purpose or function as that proposed, but which may have less potential for harm.

The City does not have any practical alternative for rehabilitation of the neighborhoods or water main, which are located in a floodplain. As a result, housing rehabilitation and water main projects should be available citywide or within CDBG eligible areas. The City will design or modify its action in order to minimize potential harm to or within the floodplain.

No Action

No action is the last alternative examined. In every instance, this course of action was viewed as unacceptable.

HOUSING REHABILITATION

The Housing Rehabilitation Program is an on-going project throughout the City of Dearborn Heights. The lack of a City-wide rehab program to improve the City's housing supply could have an adverse affect on neighborhoods. This program improves many aspects of life for Dearborn Heights residents. For example, the updating and rehabilitating of homes prevent blight and slums which improves the overall quality and aesthetic value of homes. Property values are protected by making neighborhoods more attractive to current and potential residents.

Water Main Replacement

The City of Dearborn Heights updating aging City infrastructure and this has become a priority for the City.

Throughout the City there are insufficient water main lines that need to be updated. The City will replace watermains to meet federal and state law.

Part II: Adverse Impacts

Since the City has determined that the floodplain sites are the only practicable alternative, the City must next identify what impacts may be expected from the proposed actions.

In assessing the expected impact, four (4) key areas were investigated. They include:

1. Natural Environment (topography, habitat, hazards, etc.);
2. Social Concerns (aesthetics, historical and cultural values, public services, etc.);
3. Economic Aspects (employment, land use pattern, energy resources, among others);
4. Legal Constraints (deeds, leases, etc.).

Table 1 and 2, the Environmental Assessment Matrix (**Appendix 5**), assesses these features for the proposed Housing Rehabilitation and Watermain activities. This table reveals that the impacts of the proposed actions do not warrant the postponement or elimination of the activities included in this analysis.

Part III: Public Hearing and Public Input

Public Hearing

Dearborn Heights held public hearings on **January 24, 2017 and on March 14, 2017** to seek input on the proposed projects for **2017-2018**. At these meetings, the public was notified that they would have the opportunity to offer input on the impact of these projects.

Upon completion of a 15-day public comment period the City will hold a public hearing to present the final results of the Floodplain Investigation Report on **April 11, 2017**.

Public Input

The City is interested in discussing practicable alternatives to these projects, learning public perceptions of possible adverse impacts that could result from undertaking these projects within the floodplain, identifying any possible administrative measures that can be used to reduce or eliminate any adverse effects, and promoting comments in relation to the mentioned projects.

Copies of the proposed **FY 2017** floodplain draft will be available for public review at JFK Jr. Library, 24602 Van Born Rd., Dearborn Heights, MI 48125, the Caroline Kennedy Library, 24590 George, Dearborn Heights, MI 48127, the Clerk's Office, 6045 Fenton, Dearborn Heights, MI 48127, and the Dearborn Heights Community and Economic Development Department on March 22, 2017.

Persons with disabilities who require special accommodations should contact 313-791-3500. Advance notice is required. Written comments on all the above plans will be received through April 6, 2017 at 5:00 P.M. at the following address: City of Dearborn Heights, Community and Economic Development Department, 26155 Richardson, Dearborn Heights, Michigan, 48127 ATTN: DIRECTOR

The City is interested in discussing practicable alternatives to these projects, obtaining information on possible adverse impacts that may result and identifying any measures that may be utilized to reduce or eliminate detrimental effects.

In order to seek further input on the 2017-2018 proposed projects, Dearborn Heights is seeking public comments from March 22, 2017 – April 6, 2017.

FLOODPLAIN VALUES

Floodplains preserve water resource values (i.e., groundwater recharge), living resources values (i.e., wildlife and plant resources), cultural resource values (i.e., open space, recreation), and cultivated resource values (i.e., agricultural).

The floodplain exists in a state of dynamic equilibrium. If one part of the floodplain is disturbed, the entire system readjusts toward a new equilibrium and may affect its floodplain values. Actions that are designed for the floodplain must be cognizant of these values and undertake efforts to preserve and protect them. Local governments administer standards and regulations related to engineering, site design, and construction. Aspects of the development, which must be reviewed and approved by the engineer and/or building official, typically include hookups to utilities, wastewater and storm water engineering, and building construction. Sanitary and water service requires county and state permit approval, as well as roadwork may require county or state approval. Permits are withheld unless the construction drawings are in conformity with the approved design.

Listing of Other Agencies Involved and Minimization of Impacts

To mitigate any negative impacts to floodplain values and in order to pursue activities within the floodplain, the City must acquire permits from other governmental agencies. For example, a Floodplain Occupation Permit is required when anything is built above ground in the floodplain from the Michigan Department of Natural Resources. Other agencies to be contacted over the course of the implementation of the actions cited above will include the U.S. Army Corps of Engineers and the Michigan Department of Public Health. In this manner, the actions will conform to applicable state and local floodplain protection standards.

Permits applicable to the protection of the floodplain values in the City of Dearborn Heights include the following:

SOIL EROSION AND SEDIMENTATION
CONTROL ACT (Act 347, P.A. of 1972)

Resource Affected: All surface waters
Administrative Mechanism: In most cases, permits are issued by designated county or local agencies. If a permit application involves two or more enforcing jurisdictions, a state permit is issued. Earth changes of one acre or more in size, or earth changes located within 500 feet of a lake or stream are subject to the permit requirements.

GOEMAERE-ANDERSON
WETLANDS PROTECTION ACT

Resource Affected: Wetlands contiguous to lakes or rivers; lakes or rivers; (Act 203, P.A. of 1979) noncontiguous wetlands greater than five acres in size, plus sites designated by the state.

Administrative Mechanism: State permit issued for activities in wetlands (local governments may also require a wetlands permit).

INLAND LAKES AND STREAMS
(Act 346, P.A. of 1972)

Resource Affected: Natural and artificial lakes, ponds, rivers, and streams, including major drains.

Administrative Mechanism: State permit required to create, enlarge, or diminish an inland lake or stream, or to build a structure in the lake or waterway.

NATURAL RIVERS ACT
(ACT 231, P.A. of 1970)

Resource Affected: Rivers, designated by the state for inclusion in the wild, scenic, and recreational river system, plus adjoining or related lands.

Administrative Mechanism: State may administer zoning regulations in designated areas if the local government zoning does not meet requirements of the law.

DAM CONSTRUCTION ACT
(Act 156, P.A. 1851)

Resource Affected: Rivers and streams.

Administrative Mechanism: State permit required for the construction of dams which impound more than five acres of land or have a head of five or more feet of water. (This law applies to many retention basins.)

FLOODPLAIN REGULATORY
AUTHORITY UNDER ACT 245,
P.A. 1929 (As Amended by Act 167
P.A. of 1968)

Resource Affected: River channels, streambeds, and floodplains with contributing drainage areas of two square miles or more.

Administrative Mechanism: Permits required to alter or occupy the river channel, stream bed, or floodplain. All developments and structures, including bridges and culverts, are subject to the requirements.

**Appendix 1
Public Notice/
Public Comments**

No comments received.

PUBLIC NOTICE
PROJECTS PARTIALLY OR FULLY LOCATED WITHIN
THE 100 YEAR FLOODPLAIN

CITY OF DEARBORN HEIGHTS
COMMUNITY AND ECONOMIC DEVELOPMENT DEPARTMENT (CEDD)
COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) **PY 2017**
PROPOSED PROJECTS FUNDS ESTIMATED ALLOCATION

PROPOSED PROJECTS IN THE 100 YEAR FLOODPLAIN	Proposed Total
RESIDENTIAL REHABILITATION	\$ 360,108.00
WATERMAIN REPLACEMENT	\$ 250,000.00
CODE ENFORCEMENT	\$ 75,000.00
TOTAL	\$ 685,108.00

THE CITY OF DEARBORN HEIGHTS IS NOTIFYING THE PUBLIC OF ITS INTENT TO FUND THE ABOVE PROPOSED PROJECT(S) THAT MAY BE LOCATED PARTIALLY OR FULLY LOCATED WITHIN THE 100 YEAR FLOODPLAIN.

USE OF FEDERAL FUNDS REQUIRE COMPLIANCE WITH FEDERAL EXECUTIVE ORDER 11988, FLOODPLAIN MANAGEMENT AND 11990, PROTECTION OF WETLANDS.

The City is interested in discussing practicable alternatives to these projects, learning public perceptions of possible adverse impacts that could result from undertaking these projects within the floodplain, identifying any possible administrative measures that can be used to reduce or eliminate any adverse effects, and promoting comments in relation to the mentioned projects.

Copies of the proposed DRAFT **PY 2017** Floodplain Investigation will be available for public review at JFK Jr. Library, 24602 Van Born Rd., Dearborn Heights, MI 48125, the Caroline Kennedy Library, 24590 George, Dearborn Heights, MI 48127, the Clerks Office, 6045 Fenton, Dearborn Heights, MI 48127, and the Dearborn Heights Community and Economic Development Department on **March 22, 2017**. Persons with disabilities who require special accommodations should contact 313-791-3500. Advance notice is required. Written comments on all the above plans will be received through **April 6, 2017 at 5:00 P.M.** at the following address: City of Dearborn Heights, Community and Economic Development Department, 26155 Richardson, Dearborn Heights, Michigan, 48127 ATTN: DIRECTOR

THIS PUBLIC NOTICE REQUIRES 15 DAYS COMMENT PERIOD FROM PUBLISHED DATE

Publish: March 22, 2017

**Joe A. Hachem, Director
Community and Economic
Development Department**

Appendix 2
Agency Contact and Comments

No comments received.

Appendix 3
Issuance of Findings Statement, Public Hearing Notice

Notice of Public Hearing
Floodplain and Wetlands Protection
City of Dearborn Heights, Wayne County, Michigan

The City of Dearborn Heights is considering funding, with Community Development Block Grant (CDBG) monies, for projects which may be located partially or fully within the 100-year floodplain. Use of federal funds requires compliance with federal Executive Orders 11988, Floodplain Management, and 11990, Protection of Wetlands. The subject project(s) are as follows:

Housing Rehabilitation

The purpose of this City-wide program is to provide no interest deferred loans to income eligible homeowners throughout the City for housing rehabilitation activities. The City will be contributing **\$360,108.00** of the **FY 2017** CDBG allocation to this program. The location of this project is City-wide.

Watermain Replacement

The City's CDBG program is providing partial funding for water main replacement in a low/moderate income area in the south end of the City. The selected section of watermain to be replaced is along Annapolis Avenue from Polk Avenue to Williams Avenue. The estimated total project cost is \$530,000. This includes design, engineering, construction, administration and construction costs. The City will contribute **\$250,000.00** of the **FY 2017** CDBG allocation to this project.

Code Enforcement

The City will provide on-going funding assistance for staff, data collection, administration, transportation and other related code enforcement activities in the CDBG low and moderate-income areas of the City. The City will be contributing **\$75,000.00** of the **FY 2017** CDBG allocation to this program.

The City is interested in discussing practicable alternatives to these projects, learning public perceptions of possible adverse impacts that could result from undertaking these projects within the floodplain and identifying any possible administrative measures which can be used to reduce or eliminate any adverse effects. A **Public Hearing** is scheduled for **Tuesday, April 11, 2017 at 7:00 PM**, at the City of Dearborn Heights' City Hall Council Chambers, 6045 Fenton Avenue, Dearborn Heights, MI 48127 to secure public input on these issues.

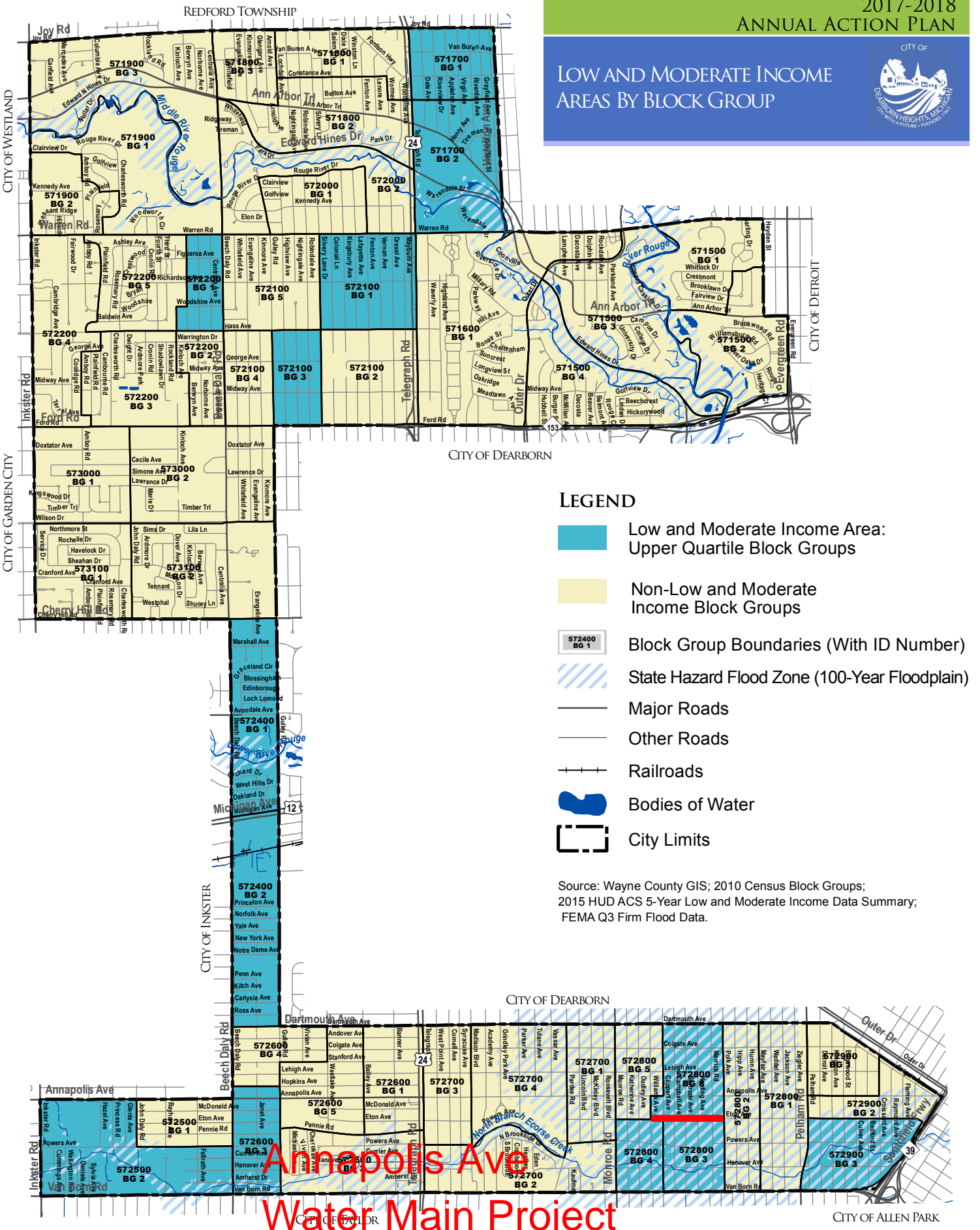
Please attend or send written comments to Mr. Joe Hachem, Community and Economic Development Director, City of Dearborn Heights, 26155 Richardson, Dearborn Heights, Michigan 48127.

Publish: March 29, 2017
April 5, 2017

Joe Hachem, Director
Community and Economic Development Department

Appendix 4
Action Plan Projects Map

LOW AND MODERATE INCOME AREAS BY BLOCK GROUP



LEGEND

- Low and Moderate Income Area: Upper Quartile Block Groups
- Non-Low and Moderate Income Block Groups
- 572400 BG 1 Block Group Boundaries (With ID Number)
- State Hazard Flood Zone (100-Year Floodplain)
- Major Roads
- Other Roads
- Railroads
- Bodies of Water
- City Limits

Source: Wayne County GIS; 2010 Census Block Groups; 2015 HUD ACS 5-Year Low and Moderate Income Data Summary; FEMA Q3 Firm Flood Data.

Annapolis Ave
Water Main Project
Location

Appendix 5
Environmental Assessment Matrix

**TABLE 1
ENVIRONMENTAL ASSESSMENT MATRIX**

PROJECT DESCRIPTION: Housing Rehabilitation

The purpose of this City wide program is to provide low interest loans to income eligible homeowners throughout the City for housing rehabilitation activities where the cost of rehabilitation is less than 50 percent of the current market value of the home. The City will be contributing \$360,108 of the FY 2017 CDBG allocation to this program.

Assessment Criteria	Negative Impacts						Positive Impacts					
	Short Term			Long Term			Short Term			Long Term		
	Direct	Indirect	Negligible	Direct	Indirect	Negligible	Direct	Indirect	Negligible	Direct	Indirect	Negligible
NATURAL ENVIRONMENT												
Plant and Animal Life												
Terrain Features												
Air												
Water												
Natural Hazards												
Resources												
Temperature												
SOCIAL ENVIRONMENT												
Public Services												
Community Facilities												
Aesthetics and Urban Design												
Social - Psychological												
Historic Properties												
Cultural Values												
Personal Safety												
Displacement												
Man-made Hazards												
Noise												
ECONOMIC ENVIRONMENT												
Infrastructure												
Employment												
Consumption Opportunities												
Land Use												
Tax Base												
Energy Resources												
LEGAL ENVIRONMENT												
Deeds, Leases, Permits												
Intergovernmental Review												
Conformance with Local Plans and Codes												

*Analysis by Wade-Trim, March 2017

**TABLE 2
ENVIRONMENTAL ASSESSMENT MATRIX**

PROJECT DESCRIPTION: Water Main Replacement

Removal and replacement of a water main in the south end of the City, located on Annapolis Ave from Polk Ave to Williams Ave. The City will be contributing \$250,000 of the FY 2017 CDBG allocation to this program.

Assessment Criteria	Negative Impacts						Positive Impacts					
	Short Term			Long Term			Short Term			Long Term		
	Direct	Indirect	Negligible	Direct	Indirect	Negligible	Direct	Indirect	Negligible	Direct	Indirect	Negligible
NATURAL ENVIRONMENT												
Plant and Animal Life												
Terrain Features												
Air												
Water												
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Public Services												
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Aesthetics and Urban Design												
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Deeds, Leases, Permits												
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