

Broad-Level Tiered Environmental Review Environmental Assessment Determinations and Compliance Findings for HUD-assisted Projects 24 CFR Part 58

Project Information

Project Name: Resilient SRQ 2024 Storms Single-Family Housing Programs Tier 1 (Broad) Review CDBG-DR

Responsible Entity (RE): Sarasota County Office of Financial Management (OFM)

State/Local Identifier: B-25-UU-12-0008

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Project Location: Sarasota County, Florida

Additional Location Information:

The Resilient SRQ 2024 Storms Single-Family Housing Programs (Resilient SRQ 2024) will only address project locations within Sarasota County including all municipalities. The exact locations of the projects will become known through the application process. See **Attachment A for Project Location Map (county-wide)**.

Approximate size of the project area:

The county is approximately 725 square miles, of which 556 square miles is land.

Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:

Background: Between August and October 2024, Sarasota County endured the severe impacts of three significant weather events: Hurricanes Debby, Helene, and Milton. Together, these storms caused widespread devastation, resulting in extensive property damage, economic disruption, and significant challenges to recovery efforts.

Due to the extensive damage caused by these storms, Sarasota County has been included in the presidentially declared disaster for each of these storms. As a result, the U.S. Department of Housing and Urban Development (HUD) has allocated Community Development Block Grant-Disaster Recovery (CDBG-DR) funds to support the county's unmet recovery needs. The Sarasota County Office of Financial Management (OFM) remains the lead agency responsible for administering these CDBG-DR funds to ensure effective and equitable recovery efforts.

The Resilient SRQ 2024 Programs are to provide home rehabilitation or reconstruction, as well as construction of new homes to low- (below 80% AMI) and moderate- (below 120% AMI) income, and reimbursement to homeowners in single-family, owner-occupied homes to address recovery efforts from the 2024 storms. This tiered environmental review includes two distinct programs under the single grant:

The Homeowner Rehabilitation/Reconstruction (owner-occupied) Program

Eligible Structures for this program include Manufactured/Mobile Home Units (MHU), Single-Family Homes, Condominiums, and Townhouses, provided they are the primary residence of the homeowner. Activities include rehabilitation, reconstruction or new construction, and replacement of MHUs.

Rehabilitation activities include but are not limited to: repair of eligible structures; lead-based paint, asbestos, radon, etc. testing and remediation (as necessary); elevation measures; mitigation; ADA improvements; and replacing/repairing on-site residential infrastructure (septic tanks, wells, etc.). Should the cost for rehabilitation of the home exceed 60% of the home's total value prior to receiving storm damage, Reconstruction Assistance will be applied.

Reconstruction activities under this program include the previously identified activities as well as full reconstruction or replacement of housing units, as well as demolition and removal of original structure. Replacement of MHUs at the existing location is included as a Reconstruction Activity. Exception: in the event that a reconstruction or MHU replacement cannot occur at the existing site due to forces outside of program requirements, the alternate site location may not be within the FFRMS floodplain and will be considered new construction.

The Homeowner Reimbursement Program

This program will offer direct reimbursement assistance to eligible homeowners who incurred out-of-pocket expenses (up to \$50,000) to repair their primary residence before applying for federal assistance through Resilient SRQ 2024. This program is available to those affected by the hurricanes in 2024 and covers documented, eligible expenses related to storm damage repairs, and for the following eligible structures: MHUs, Single-Family Homes, Condominiums, and Townhouses. To be considered for reimbursement, repairs

must be carried out within the same area as the damaged structure, such as the footprint, sidewalk, driveway, or other developed areas. Homeowners may be eligible to participate in both programs.

Each program has separate priorities and steps, but the recipients and types of activities have significant overlaps. All projects are within Sarasota County. All homes will be single family units.

The Rehabilitation Scope of Work will vary, to include but not limited to repair or replacement of drywall, doors, windows, flooring roof, electrical, HVAC, plumbing systems, foundation repair wheelchair ramps, etc.

For the Reconstruction Scope of Work, the size of the home will be based on the family size per the Action Plan; on substantially the same footprint; and includes the use of materials rated for Florida windstorm, elevated to address Base Flood Elevation requirements; and will utilize energy efficient appliances as required by Florida State guidelines.

The maximum amount for each Rehabilitation Assistance is \$200,000.

The maximum amount for each Reconstruction Assistance is \$310,000.

The maximum amount for each Reimbursement Assistance is \$50,000.

Given the location of most homes and the age of the housing inventory, we expect to work closely with the Florida State Historic Preservation Officer (SHPO) for cultural resources site-specific reviews. Additionally, when applicable, the Environmental Protection Agency Lead Renovation, Repair and Painting Program (EPA RRP) certified organization will utilize 3rd party testing to identify and remediate lead risks in accordance with all required guidelines. Rarely does this work require ground disturbances but, in those instances, our team will confer with the SHPO office and other necessary agencies needed (811, utility companies, etc.). All homes are owner-occupied; no property acquisitions are required. All homes will be retained by the residents as a condition of program participation.

OFM will utilize a tiered approach [24 CFR 58.15 (Tiering)] to evaluate the potential impacts of the Resilient SRQ 2024 Programs. A general Tier 1 (Broad Review) will document those resources where the impacts of the program activities may be addressed in a county-wide manner. Items where compliance cannot be determined in the Tier 1 (Broad Review), will be addressed in the Tier 2 (Site-Specific) reviews. There will be three checklists: 1. Reimbursement Only, 2. Rehabilitation/Reconstruction and Reimbursement, 3. New Construction.

Tiering Strategy:

Reimbursement Only, Tier 1 Broad Review:

Airport Hazards, Coastal Barrier Resources, Clean Air, Coastal Zone Management, Contamination and Toxic Substances, Endangered Species, Explosive and Flammable Hazards, Farmlands Protection, Floodplain Management, Historic Preservation, Noise Abatement and Control, Sole Source Aquifers, Wetlands Protection, and Wild and Scenic Rivers.

Tier 2: Flood Insurance.

Rehabilitation/Reconstruction, Tier 1 Broad Review:

Airport Hazards, Coastal Barrier Resources, Clean Air, Coastal Zone Management, Contamination and Toxic Substances [Radon], Explosive and Flammable Hazards, Farmlands Protection, Historic Preservation [Tribal Consultation], Noise Abatement and Control, and Sole Source Aquifers.

Tier 2: Flood Insurance, Contamination and Toxic Substances, Endangered Species, Floodplain Management, Historic Preservation [SHPO Only], Wetlands Protection, and Wild and Scenic Rivers.

New Construction, Tier 1 Broad Review:

Airport Hazards, Coastal Barrier Resources, Clean Air, Coastal Zone Management, Contamination and Toxic Substances [Radon], Farmlands, Historic Preservation [Tribal Consultation], and Sole Source Aquifers.

Tier 2: Site Specific: Flood Insurance, Contamination and Toxic Substances, Endangered Species, Explosive and Flammable Hazards, Floodplain Management, Historic Preservation [SHPO Only], Noise Abatement and Control, Wetlands Protection, and Wild and Scenic Rivers.

Statement of Purpose and Need for the Proposal [40 CFR 1508.9(b)]:

The purpose of the proposed project is to assist residents of Sarasota County whose single-family homes were damaged or destroyed by Hurricanes Debby, Helene, and/or Milton in 2024. One of the primary purposes of the program is to promote long-term community stability and resilience.

The project is needed to help provide adequate housing and support for residents by repairing and/or reconstructing existing homes and reimbursing eligible homeowners for repairs made prior to application for federal assistance.

Existing Conditions and Trends [24 CFR 58.40(a)]:

Many properties in Sarasota County were either damaged, substantially damaged, or completely destroyed due to Hurricanes Debby, Helene, and/or Milton. Some property owners are repairing/reconstructing their homes as funds become available, while others have no available funds to complete needed repairs. Many homeowners do not have the resources to repair, reconstruct, or relocate to less vulnerable areas. In the absence of the proposed program, the remaining damaged properties will continue to deteriorate causing additional harm to the communities in which the properties are located.

Repairing and reconstructing damaged homes with CDBG-DR funds including more storm resistant, and accessible single-family housing, particularly for those who are LMI, under- or uninsured, and have not been able to complete their recovery, will ensure that structures are resilient and safe. The Resilient SRQ 2024 Programs are designed to prioritize homeowners who continue to face recovery barriers because they have not had access to the resources, support services, and/or capacity to complete their recovery.

Length of time covered by this review:

5 years; 2025-2030

Maximum number of dwelling units or lots addressed by this tiered review:

It is anticipated that approximately 400 to 500 homeowners will be assisted with a potential of up to 750 added homeowners if additional funds become available.

Funding Information

Grant Number	HUD Program	Program Name	Funding Amount
B-25-UU-12-008	CDBG-DR	Homeowner Rehabilitation/ Reconstruction	\$25,000,000
B-25-UU-12-008	CDBG-DR	Homeowner Reimbursement	\$8,300,000

Estimated Total HUD Funded Amount:

\$33,300,000

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]:

\$33,300,000

**Compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities and
Written Strategies**

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR 50.4, 58.5, and 58.6	Was compliance achieved at the broad level of review?	If Yes: Describe compliance determinations made at the broad level. If No: Describe the policy, standard, or process to be followed in the site-specific review.
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.6		
Airport Hazards 24 CFR Part 51 Subpart D	<div style="display: flex; justify-content: space-around;"> Yes No </div> <div style="display: flex; justify-content: space-around;"> <input checked="checked" type="checkbox"/> <input type="checkbox"/> </div>	<p>After examining maps and data for both civilian and military airfields, it has been determined that there will be no effect on the proposed projects, and the review of this element is complete. This determination is based on the following factors:</p> <p>The Florida Department of Environmental Protection's map of military installations in Florida demonstrates there is no military installation within Sarasota County and none within 15,000 feet of the County itself.</p> <p>HUD's regulation found at 24 CFR Part 51 Subpart D defines Civil Airports as existing commercial service airports as designated in the National Plan of Integrated Airport Systems (<i>prepared by the Federal Aviation Administration in accordance with section 504 of the Airport and Airway Improvement Act of 1982</i>).</p> <p>The National Plan of Integrated Airport Systems (NPIAS) map displayed two mapped airports within or adjacent to Sarasota County; they are Venice Municipal Airport (VNC) and Sarasota Bradenton International Airport (SRQ).</p> <p>Further review of each of these airports utilizing Appendix A of the NPIAS Report revealed that Venice Municipal Airport is categorized as a Non-primary, Regional Airport which does not meet the definition of a commercial services airport (See Appendix C for definition). However, Sarasota–Bradenton International Airport is classified as a Primary Commercial Services Airport (Small Hub). and only a portion of the southern areas of the SRQ runway protection zone/clear zones (RPZ/CZ) are located within Sarasota County.</p>

		<p>Sarasota County has passed a resolution to deter development in the RPZ/CZ areas of the Sarasota Bradenton International Airport and per the updated Master Plan for the airport, Sarasota Bradenton International Airport is actively planning and budgeting to purchase all properties that do not meet appropriate land use standards outlined by the DOD.</p> <p>The portion of the runways located within Sarasota County include the Southwestern end of Runway 4-22 which has 4 homes within the RPZ/CZ zone as depicted in the Master Plan on Figure 5.2-3. These homes were identified on the Sarasota County Property Appraiser maps and located in Sarasota:</p> <ul style="list-style-type: none"> • 554 Poincianna Drive • 559 Poincianna Drive • 560 Poincianna Drive • 569 Poincianna Drive <p>These properties and the single-family structures on them are all within the RPZ/CZ zone and will not be eligible for assistance.</p> <p>One property across the street from 569 Poincianna Drive has already been acquired and is now owned by Sarasota Bradenton International Airport per the Sarasota County Property Appraiser maps and data. Lastly, the property behind this lot, found at 567 Parkview, includes a small portion of the far northeast corner of the property within the RPZ/CZ, however, the house is not within this zone.</p> <p>The four addresses noted above will be listed and checked as part of the eligibility process for assistance and disqualified.</p> <p>The RPZ/CZ located on Runway 4-32 contains no housing of any kind per the Sarasota Bradenton Master Plan and proposed budget which identifies open areas, commercial properties and housing that is being budgeted for removal.</p> <p>Additionally, the Sarasota Manatee Airport Authority (governing body of the Sarasota Bradenton International Airport) was notified on</p>
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		<p>June 26, 2025, of the award of disaster funds for Hurricanes Debby, Helene, and Milton and the planned use of these funds for housing assistance in the form of Reimbursement, Rehabilitation, Reconstruction and New Construction. No response or request for additional information has been received as of the date of this document.</p> <p>This element is in compliance with HUD's regulations and no homes will be served within the RPZ/CZ.</p> <p>Attachment B: Florida Department of Environmental Protection's Military Bases map, NPIAS Excerpts from Appendix A, B and C (A - List of NPIAS Airports, Terms & Abbreviations, B - NPIAS airport map, C – Statutory & Policy Definitions...) Excerpt maps from Google Earth and Sarasota County Property Appraiser maps and Sarasota Bradenton International Airport Master Plan Update, and correspondence with Sarasota Manatee Airport Authority.</p> <p>Attachment B1: Sarasota Bradenton International Airport Master Plan Update Final Report, prepared in 2021 and adopted in 2022, and County resolution to avoid residential development in an RPZ.</p> <p>The proposed project is in compliance with Airport Hazards and no further action is required.</p>
<p>Coastal Barrier Resources</p> <p>Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]</p>	<p>Yes No</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>After analysis of the US Fish and Wildlife Coastal Barrier Resource System (CBRS) Mapper and utilizing Google Earth and the Sarasota County Property Appraiser maps it was determined there will be no impact on the Coastal Barrier Resources or Otherwise Protected Areas (OPA). A few residential properties were identified within two of the CBRS units found in Sarasota County, the following is a complete list of these addresses, which will not be eligible for assistance in this program:</p> <ul style="list-style-type: none"> • 1600 N. Casey Key Rd., Osprey • 1594 N. Casey Key Rd., Osprey • 1588 N. Casey Key Rd., Osprey • 1544 N. Casey Key Rd., Osprey

		<ul style="list-style-type: none"> • Residential lot between 1544 and 1538 N. Casey Key Rd., Osprey • 1538 N. Casey Key Rd., Osprey • 1522 N. Casey Key Rd., Osprey • Residential lot located between 1522 and 1400 N. Casey Key Rd., Osprey • 1400 N. Casey Key Rd., Osprey • 1360 N. Casey Key Rd., Osprey • 6785 Manasota Key Rd., Englewood <p>Reviewing the CBRS mapper within Sarasota County, many developed areas of concern were established prior to adoption of the Coastal Barrier Resources Act of 1982 and are not considered part of the CBRS.</p> <p>The areas that are included in the CBRA system, beginning at the Sarasota-Manatee County Line and moving south:</p> <p>FL-72P Lido Key is an OPA unit. All areas within this unit are parkland owned by Sarasota County.</p> <p>P-22 is a CBRS unit. Much of this unit contains parks and recreational areas owned by Sarasota County. However, in the Southernmost section of this unit there are several multimillion-dollar residential lots which will not qualify for assistance in this program. They are found at the following in Osprey:</p> <ul style="list-style-type: none"> • 1600 N. Casey Key Rd. • 1594 N. Casey Key Rd. • 1588 N. Casey Key Rd. • 1544 N. Casey Key Rd. • Vacant lot between 1544 and 1538 N. Casey Key Rd. • 1538 N. Casey Key Rd. • 1522 N. Casey Key Rd. • Lot located between 1522 and 1400 N. Casey Key Rd. • 1400 N. Casey Key Rd. • 1360 N. Casey Key Rd. <p>FL-71P is an OPA unit. This unit contains parks and recreational areas as well as inland</p>
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		<p>navigational rights-of-way. There are no residences within this OPA.</p> <p>OPA unit P21AP and CBRS unit P21A. Within this section, all areas are designated Park and Recreation with the exception of one 15,000 ft lot with a restaurant and another unit which is a park for military members only.</p> <p>The next OPA is found at Manasota Beach; unit P21AP, this area contains only parkland owned by Sarasota County.</p> <p>The last unit in Sarasota County is near Blind Pass Beach Park, CBRS unit P21A. This unit is nearly all parkland owned by the County except for one home located 6785 Manasota Key Road, Englewood.</p> <p>The CBRS element is complete and in compliance, all residential lots within a CBRS unit or OPA units have been identified and will be added to the disqualification utilized during eligibility determinations.</p> <p>Attachment C: Sarasota County Coastal Barrier Resources Map, Excerpts Map of CBRS and Sarasota County Property Appraiser.</p> <p>The proposed project is in compliance with Coastal Barrier Resources and no further action is required.</p>
<p>Flood Insurance</p> <p>Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>Sarasota County and all its municipalities (Longboat Key, North Port, Sarasota, Venice) participate in the National Flood Insurance Program (NFIP).</p> <p>If during the review of the project site, the home is found to be within a Special Flood Hazard Area (SFHA) per the effective Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM), the homeowner will be required to obtain and maintain flood insurance for the life of the home. In the event a home was determined to be within the SFHA and received prior disaster assistance and did not maintain required flood insurance, they will not be eligible for assistance in the Resilient SRQ 2024.</p> <p>Attachment D: County-wide floodplain map,</p>

		<p>NFIP Participating Communities list for Sarasota County and all Municipalities.</p> <p>Compliance Review for this element will be completed at the Tier 2 (Site-Specific) review.</p>
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §58.5		
<p>Clean Air</p> <p>Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93</p>	<p>Yes No</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>According to the U.S. EPA Nonattainment and Maintenance Area Population Tool, Sarasota County is in attainment for all six National Ambient Air Quality Standards (NAAQS).</p> <p>The proposed projects will only serve current homeowners and will not increase density or capacity (vehicular traffic).</p> <p>Emissions associated with the proposed actions are limited to use of residential and small construction equipment and are estimated to be well below the threshold when compared to the federal General Conformity Rule de minimis thresholds.</p> <p>The U.S. EPA, Sarasota County Environmental Protection Division, City of Sarasota, City of Venice, City of North Port, and Town of Longboat Key Air Quality Divisions were notified of the proposed project intent on June 26, 2025. No responses have been received as of the date of this document.</p> <p>Best Management Practices:</p> <p><i>During project construction, there will be some increase in ambient dust particulate from machinery and soil disturbances. These will be only temporary in nature and all efforts will be made through proper construction methods to ensure dust control and properly functioning equipment. Contractors should ensure that best management practices are used to control runoff from construction sites to prevent detrimental impact to surface and ground water.</i></p> <p>Attachment E: Air Quality Map and Agency Consultations, Source Review.</p> <p>The proposed project is in compliance with the Clean Air Act and no further action is required.</p>
Coastal Zone Management	<p>Yes No</p>	<p>According to the National Oceanic and Atmospheric Administration (NOAA) Office for</p>

<p>Coastal Zone Management Act, sections 307(c) & (d)</p>	<p><input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>Coastal Management (OCM) data, the entire state of Florida is included within the coastal zone.</p> <p>Additionally, per the Florida Coastal Management Program Guide, the Coastal Zones for Florida are tiered. Coastal Counties are considered Tier 1 and must submit projects for “Federal Consistency” to the Florida State Clearinghouse to ensure consistency with all related laws and regulations as well as executive orders.</p> <p>As required by Executive Order 12372, the Florida State Clearinghouse, Office of Intergovernmental Programs, was contacted on June 26, 2025, to provide an overview of the program and ensure consistency with the Florida Coastal Management Plan.</p> <p>A response was received on July 21, 2025, indicating that the project was not selected for review and “to proceed with the project.”</p> <p>Attachment F: Coastal Zone Management Act Map and Florida Clearinghouse Correspondence.</p> <p>The proposed project is in compliance with the Coastal Zone Management Act and no further action is required.</p>
<p>Contamination and Toxic Substances</p> <p>24 CFR Part 50.3(i) & 58.5(i)(2)]</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The Reimbursement Only projects do not trigger this element as it will be a financial transaction for work already completed as required by the Housing Guidelines. As such, this element is in compliance for Reimbursement Only projects and no further action is required.</p> <p>Compliance Review for this element will be completed at the Tier 2 (Site-Specific) review for Rehabilitation, Reconstruction, and New Construction.</p> <p>Sarasota County includes areas with potential contamination per the Environmental Protection Agency’s (EPA) NEPAssist EnviroMapper.</p> <p>The Tier 2 (site-specific) analysis will be conducted at each identified property and will include a desktop screening. This will be based on the American Society for Testing and Materials All Appropriate Inquiries (ASTM/AAI) minimum search radius guidelines as well as an on-site visual</p>

		<p>inspection documented with photographs utilizing HUD's Field Site Visit checklist.</p> <p>The evaluation will consider historical land use records, federal and state environmental database searches, and visual site inspections to assess the likelihood of the presence of toxic chemicals, hazardous substances, or radioactive materials on, adjacent to, or in proximity to the project site including mold and Asbestos Containing Material (ACM). If contamination is suspected or cannot be definitively ruled out, or if conditions are determined to present more than <i>de minimis</i> risk, additional investigation may be required in accordance with HUD environmental regulations at 24 CFR Part 58.</p> <p>Homes that are identified as being constructed prior to 1978 will be tested for Lead Based Paint (LBP) per the protocols in the Housing Guidelines.</p> <p>To date, a scientific data review was done for Radon via the U.S. Dept of Health and Human services, Centers for Disease Control and Prevention (CDC), National Environmental Public Health Tracking, Radon Testing Data in compliance with CPD 23-103.</p> <p>At the county level, a total of 2,680 Pre-mitigation Radon tests were reported by the State of Florida in Sarasota County from 2014-2023 (the most recent 10-year period available). The results of those tests showed an average level of indoor air radon levels at 2.6 pCi/L, which is less than the 4 pCi/L threshold to be considered an area of high impact or EPA Action Level.</p> <p>The proposed project is in compliance with Radon and no further action is required.</p>
<p>Endangered Species</p> <p>Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>A list of threatened, endangered, and candidate species and their designated critical habitat was acquired through the U.S. Fish and Wildlife Service's (USFWS) Information, Planning, and Consultation system (IPaC) for Sarasota County.</p> <p>The Reimbursement Only projects do not trigger this element as the level of assistance is limited and will not constitute any effects to listed species or</p>

		<p>their habitats. As such, this element is in compliance for Reimbursement Only projects and no further action is required.</p> <p>In Sarasota County, there are a total of twenty-five (25) threatened, endangered, or candidate species and four (4) critical habitats listed under the jurisdiction of the USFWS on the IPaC report. There is final critical habitat within Sarasota County for the Aboriginal Prickly-apple (<i>Harrisia</i> (= <i>Cereus</i>) <i>aboriginum</i> (= <i>gracilis</i>)), Loggerhead Sea Turtle (<i>Caretta caretta</i>), and the West Indian Manatee (<i>Trichechus manatus</i>). The West Indian Manatee is protected by the Endangered Species Act, Florida Manatee Sanctuary Act, and the USFWS. There is proposed critical habitat for the Green Sea Turtle (<i>Chelonia mydas</i>) and the Rufa Red Knot (<i>Calidris canutus rufa</i>).</p> <p>According to the USFWS, Florida is within the Atlantic Flyway for migratory birds. Migrant birds use the region due to its warm climate for wintering location, range of habitats, and food source availability. Vegetation, including trees, shrubs, and grasses around a project may provide habitat for migratory birds. The Migratory Bird Treaty Act of 1918 prohibits take, attempting to take, accidental take, capturing, killing, selling/purchasing, possessing, transporting, and importing of migratory birds (including ground nesting species), their eggs, parts and nests, except when specifically authorized by the Department of the Interior. This would include prohibiting harassment of nesting birds and young during the breeding season.</p> <p>Project activities shall not occur on, or adjacent to, mapped wildlife refuges, fish hatcheries, wildlife management areas, or related significant fish and wildlife resources. In addition, the proposed activities will have “No Effect” on bald eagles per the FWC bald eagle rule 68A-16.002, F.A.C.</p> <p>Rehabilitation and Reconstruction shall be confined to existing private residential properties in previously disturbed and developed areas committed to residential land use. Rehabilitation activities will stay on the current existing home site</p>
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		<p>while Reconstruction activities will be constructed substantially within the original footprint of the structure. Best management practices identified lower in this section will be incorporated for these activities. It has been determined that Rehabilitation and Reconstruction activities will have “No Effect” on listed threatened or endangered species. As such, this element will be in compliance and no further action is required. The proposed project is in compliance with Section 7 of the Endangered Species Act.</p> <p>No further assessment is required for Rehabilitation or Reconstruction as this portion of the review for this element is complete and will not be part of the Tier 2 (site-specific) review.</p> <p>New Construction at an alternate location will be on infill lots within residential areas containing all city services (water/sewer/electric/etc.). As there are likely to be more construction activities and disturbances at these sites, it will be required to assess and review this element at the Tier 2 (site-specific) level.</p> <p>Compliance Review for this element will be completed at the Tier 2 (Site Specific) review for New Construction.</p> <p>The following are best management practices that will be incorporated into the on-site review and for the construction period:</p> <ul style="list-style-type: none"> •The proposed project may result in the removal of existing vegetation such as overgrown grass and shrubs. USFWS conservation measures will be followed to avoid activities that may disturb nesting and young during the primary nesting season (early April to mid-July). Any trees immediately adjacent to any of the proposed project areas should be considered for the potential of any active nests. Should any active nests be identified prior to construction activities, the USFWS Ecological Services Field Office and/or USFWS Regional Migratory Bird Management Office will be contacted for guidance on appropriate next steps to avoid and minimize
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		<p>impacts to (and take of) migratory birds.</p> <ul style="list-style-type: none"> •USFWS conservation measures will be followed to avoid activities that may disturb bats maternity season (mid-April to mid-August). Should any signs of potential bat presence (visually, bat guano, etc.) be identified prior to demolition or construction activities, the USFWS Ecological Service Field Office will be contacted on appropriate guidance to minimize impacts and properly handle. •During construction, tree removal or trimming will be limited to the fullest extent possible. The presence of tree species on residential lots may have the potential to provide habitat to protected migratory species. If any migratory birds are observed on the subject property, all work shall cease immediately, and a professional wildlife biologist consulted for next steps. •Avoid activities requiring vegetation removal or disturbance during peak bird nesting season (March through September) to prevent the destruction of migratory birds, nests, or eggs. When project activities cannot occur outside the bird nesting season, conduct surveys, within a reasonable time frame, prior to scheduled activity to determine if active birds, nests, or eggs are present within the area of impact. If evidence of migratory birds is found, a qualified biologist with USFWS should be notified. If nests are found, USFWS recommends leaving a buffer of vegetation (≥ 100 ft) around songbird nests detected until young have fledged or the nest is abandoned. All lighting should be down shielded and should follow the Dark Skies. <p>NMFS was contacted on June 26, 2025, with no response received.</p> <p>Attachment H: USFWS, NOAA, and NMFS Consultation, IPaC Report, Endangered Species and Critical Habitat Map.</p> <p>Compliance Review for this element will be completed at the Tier 2 (Site-Specific) review for New Construction.</p>
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<p>Explosive and Flammable Hazards</p> <p>24 CFR Part 51 Subpart C</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The proposed Rehabilitation, Reconstruction and Reimbursement projects will not increase residential densities as they are single-family owner-occupied homes, and the purpose of the grant is to preserve housing stock and ensure recovery for these neighborhoods in Sarasota County. As such, this element is in compliance and no further action is required for Rehabilitation, Reconstruction, and Reimbursement projects.</p> <p>Per 24 CFR Part 51C Section 201, “For purposes of this subpart the terms “rehabilitation” and “modernization” refer only to such <i>repairs and renovation of a building or buildings as will result in an increased number of people being exposed to hazardous operations by increasing residential densities</i>, converting the type of use of a building to habitation, or making a vacant building habitable”.</p> <p>Per HUD’s updated interpretation of this regulation, disaster projects meant to restore housing on the same approximate footprint will not result in an increase in density and as such will not be subject to this element. As New Construction is the only project category that would minimally increase density in any neighborhood, compliance will be achieved at the Tier 2 (site-specific) review.</p> <p>Attachment I. - HUD regulation.</p> <p>Compliance Review for this element for New Construction will be completed at the Tier 2 (Site-Specific) review.</p>
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<p>Farmlands Protection</p> <p>Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</p>	<p>Yes No</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>The proposed programs will provide funding for Rehabilitation, Reconstruction, Reimbursement, or New Construction of single-family owner-occupied homes in Sarasota County. All homes are located in established areas dedicated to urban use, new construction will be infill housing and as such will also be in areas dedicated to urban use with all city services in place.</p> <p>The Farmlands Protection Policy Act does not apply to projects on land already dedicated to urban development (7 CFR 658.2(a)); therefore, all proposed program activities are in compliance with the Farmland Protection Policy Act and will not irreversibly convert farmland to a non-agricultural use.</p> <p>As a courtesy, the Natural Resources Conservation Service was notified on June 26, 2025. No response has been received.</p> <p>Attachment J: Sarasota TIGERweb Census Urban Use Map, County Urban Land Use Map, Agency Consultation.</p> <p>The proposed project is in compliance with the Farmland Protection Policy Act and no further action is required.</p>
<p>Floodplain Management</p> <p>Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The Reimbursement Only projects do not trigger this element as the level of assistance is limited and will not constitute Substantial Improvement or Substantial Damage (SI/SD). As such, this element is in compliance for Reimbursement Only projects and no further action is required.</p> <p>Rehabilitation may meet the SI/SD threshold and Reconstruction requires to be examined for this element.</p> <p>According to the FEMA Flood Map Service Center, there are approximately 103,967 acres of 100-year floodplain, 27,566 acres of 500-year floodplain, and 8,835 acres of Coastal High Hazard Areas (V Zone), and approximately 10,319 acres of LiMWA areas within Sarasota County.</p> <p>Based on this information the County of Sarasota has chosen to perform the 8-step Decision Making</p>

		<p>Process at the Tier 1 Broad Review level to expedite disaster recovery.</p> <p>The early public notice describing the project was published on the Sarasota County Resilient SRQ 2024 Storms website, which is accessible to individuals with disabilities and provides meaningful access for individuals with Limited English Proficiency, on 6/11/2025 in English.</p> <p>Within this process Alternatives to the proposed project activities were examined and included locating outside the FFRMS floodplain and or wetlands, initiating other flood protection measures and the no action alternative. Additionally direct and indirect effects of the proposed projects were examined, and all alternatives were then re-examined before the final findings of the process were made and prepared for publication. The final notice for this process will be published along with the Combined Notices of the Notice of Intent to Request a Release of Funds and the Finding of No Significant Impacts. The seven (7) day comment period will be extended and will match the Combined Notice's Federal Objection period of 15 days after publication. All three notices will be published together in English on the Sarasota County Resilient SRQ 2024 Storms website.</p> <p>Once homes are identified, each will be analyzed to determine if it is within a FFRMS floodplain.</p> <p>Homes located in the FFRMS floodplain that receive assistance for reconstruction, repair of substantial damage, or substantial improvement, will be elevated with the lowest floor, including the basement, at least to the FFRMS floodplain elevation. When the reconstruction of a single-family home is not feasible at the original location of the structure, an alternative location is allowed based on the Program's Housing Guidelines. The alternate location must be outside the FFRMS floodplain and contain all city services (water/sewer/electric/etc.). As the alternate location is required to be located outside the FFRMS floodplain, this element for New</p>
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		<p>Construction is in compliance and no further action is required.</p> <p>A notification of the project was sent to applicable parties on June 26, 2025. No response has been received.</p> <p>Attachment K: Floodplain Map, 8-Step Documentation, Early Notice, Consultation Letters for FEMA, Town of Longboat Key, Cities of North Port, Sarasota, and Venice County.</p> <p>Compliance Review for this element will be completed at the Tier 2 (Site-Specific) review for Rehabilitation and Reconstruction only.</p>
<p>Historic Preservation</p> <p>National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The Reimbursement Only projects do not trigger this element as it will be a financial transaction for work already completed as required by the Housing Guidelines. As such, this element is in compliance for Reimbursement Only projects and no further action is required.</p> <p>Once selected, project locations will be mapped at the site-specific level to determine proximity to listed or eligible structures, neighborhoods, and districts.</p> <p>Each subject property will be evaluated to determine the year-built date of structures to be rehabilitated or reconstructed. Structures over 45 years may be considered historic.</p> <p>For potentially historic properties and buildings, properties within or adjacent to historic structures, neighborhoods, or districts, and new construction on previously undisturbed ground, consultation with the Florida State Historic Preservation Officer (SHPO) will be necessary to determine historic status, impacts, and plausible effects as a result of the proposed undertaking.</p> <p>Florida SHPO was contacted on June 26, 2025. To date, no response has been received from SHPO. Section 106 clearance will be obtained at the Tier 2 (site-specific) level.</p> <p>Native American tribes with potential cultural and traditional affiliations to Sarasota County [Miccosukee Tribe, Muscogee (Creek) Nation, and Seminole Tribe of Florida] were contacted on June</p>

		<p>26, 2025. Although these Tribes were contacted at the Tier 1 (broad review), and no responses have been received to date of this review, we continue to appreciate any correspondence they offer.</p> <p>No further assessment is required for Tribal Consultation as this portion of the review for this element is complete and will not be a part of the Tier 2 (site-specific) review.</p> <p>For the MHUs, no additional Section 106 consultation is currently necessary as there is a Programmatic Agreement (PA) between FEMA, Sarasota County, local Federally Recognized Tribes, and HUD. This current PA is set to expire on September 10, 2025. An extension of this date is pending, and discussions are on-going to extend either this PA or create a new document.</p> <p>Attachment L: TDAT, SHPO and Tribal Consultations.</p> <p>Compliance Review for this element will be completed at the Tier 2 (Site-Specific) review for Rehabilitation, Reconstruction, and New Construction.</p>
<p>Noise Abatement and Control</p> <p>Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The Reimbursement Only projects do not trigger this element as all work is complete, and the activity is financial in nature only. As such, this element is in compliance for Reimbursement Only projects and no further action is required.</p> <p>Rehabilitation and Reconstruction for the owner-occupied home on substantially the same footprint: Per 24 CFR Part 51.101(a)(3) - The HUD Noise Abatement and Control requirements do not apply to any action or emergency assistance under disaster assistance provisions or appropriations which are provided to save lives, protect property, protect public health and safety, remove debris and wreckage, or assistance that has the effect of restoring facilities substantially as they existed prior to the disaster. As such, this element is in compliance for Rehabilitation and Reconstruction, and no further action is required.</p> <p>Attachment M: HUD Regulation</p> <p>New Construction of a relocated home or MHU is</p>

		<p>not exempt from this element and must be assessed at the site-specific level</p> <p>Compliance Review for this element will be completed at the Tier 2 (Site-Specific) review for New Construction only.</p>
<p>Sole Source Aquifers</p> <p>Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149</p>	<p>Yes No</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>According to the U.S. Environmental Protection Agency's Sole Source Aquifers GIS mapper, there are no Sole Source Aquifers located in Sarasota County.</p> <p>Attachment N: EPA Sole Source Aquifer Map.</p> <p>The proposed project is in compliance with the Safe Drinking Water Act section 1424(e) and no further action is required.</p>
<p>Wetlands Protection</p> <p>Executive Order 11990, particularly sections 2 and 5</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The Reimbursement Only projects do not trigger this element as the actions are complete, and any possible ground disturbance has already occurred as only completed work is eligible for reimbursement per the Housing Guidelines. As such, this element is in compliance for Reimbursement Only projects and no further action is required.</p> <p>Rehabilitation may meet the SI/SD threshold and Reconstruction requires to be examined for this element.</p> <p>Sarasota County contains approximately 187,328 acres of mapped wetlands which includes Palustrine Forested Wetlands, Freshwater Marshes and Wet Prairies, Estuarine Wetlands (including mangrove swamps) and tidal marshes along coastal zones according to the U.S. Fish and Wildlife Service National Wetlands Inventory.</p> <p>Based on this information the County of Sarasota has chosen to perform the 8-step Decision Making Process at the Tier 1 Broad Review level to expedite disaster recovery.</p> <p>The early public notice describing the project was published on the Sarasota County Resilient SRQ 2024 Storms website, which is accessible to individuals with disabilities and provides meaningful access for individuals with Limited English Proficiency, on 6/11/2025 in English.</p>

		<p>Within this process Alternatives to the proposed project activities were examined and included locating outside the FFRMS floodplain and/or wetlands, initiating other flood protection measures to protect property and natural flora and the no action alternative. Additionally direct and indirect effects of the proposed projects were examined, and all alternatives were then re-examined before the final findings of the process were made and prepared for publication. The final notice for this process will be published along with the Combined Notices of the Notice of Intent to Request a Release of Funds and the Finding of No Significant Impacts. The seven (7) day comment period will be extended and will match the Combined Notice's Federal Objection period of 15 days after publication. All three notices will be published together in English on the Sarasota County Resilient SRQ 2024 Storms website.</p> <p>Once homes are identified, each will be analyzed to determine if it is within or adjacent to a wetland and apply appropriate mitigation measures to minimize or avoid impacts as discussed in the 8-step decision making process document.</p> <p>When the replacement of a single-family home is not feasible at the original location of the structure, the home will be replaced at an alternative location. The alternate location must be outside the FFRMS floodplain, cannot have a wetland present on the property and must contain all city services (water/sewer/electric etc.).</p> <p>The selected alternative allows for reconstruction of homes located adjacent to wetlands but specifies minimum construction BMPs for protection of water quality and wetlands ecology. BMPs for soil erosion and stormwater management will be applied as appropriate for the protection of wetlands.</p> <p>The U.S. Army Corps of Engineers was notified on June 26, 2025. No response has been received to date.</p> <p>Attachment O: County-wide Wetland Map, USACE Consultation, 8-step Decision Making</p>
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		document, Early Notice Compliance Review for this element will be completed at the Tier 2 (Site-Specific) review for Rehabilitation, Reconstruction, and New Construction.
Wild and Scenic Rivers Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	<p>The Reimbursement Only projects do not trigger this element as all work is complete, and the activity is financial in nature only. As such, this element is in compliance for Reimbursement Only projects and no further action is required.</p> <p>While there are no designated National Wild and Scenic rivers in Sarasota County, per the Nationwide Rivers Inventory, the Myakka River flows through the largest state park named after the river. The river's headwaters are near Hardee County line to just North of the Southern boundary of Myakka State Park and is 41 miles in length.</p> <p>The Myakka River enters Sarasota County just North of the Myakka River Park which is populated with homes within a mile of this river segment.</p> <p>Additionally, the Myakka River is the only river in Florida designated by the state legislature as a Wild and Scenic River beginning at river mile 7.5 and ending at river mile 41.5. All homes located along the Myakka within a mile of the river segment will require consultation with the U.S National Park Service as well as the Florida Department of Environmental Protection, Florida State Parks, District 4 Administration for Rehabilitation, Reconstruction, and New Construction.</p> <p>The Florida Department of Environmental Protection was notified of the proposed projects on June 26, 2025, with no response received to date.</p> <p>Attachment P: Wild & Scenic Map, River Inventory Map, Florida Designated Map, Correspondence with FDEP.</p> <p>Compliance Review for this element will be completed at the Tier 2 (Site Specific) review for Rehabilitation, Reconstruction, and New Construction.</p>

Environmental Assessment Factors [24 CFR 58.40; Ref. 40 CFR 1508.8 & 1508.27] Recorded below is the qualitative and quantitative significance of the effects of the proposal on the character, features and resources of the project area. Each factor has been evaluated and documented, as appropriate and in proportion to its relevance to the proposed action. Verifiable source documentation has been provided and described in support of each determination, as appropriate. Credible, traceable and supportive source documentation for each authority has been provided. Where applicable, the necessary reviews or consultations have been completed, and applicable permits of approvals have been obtained or noted. Citations, dates/names/titles of contacts, and page references are clear. Additional documentation is attached, as appropriate. **All conditions, attenuation or mitigation measures have been clearly identified.**

Impact Codes: Use an impact code from the following list to make the determination of impact for each factor.

- (1) Minor beneficial impact
- (2) No impact anticipated
- (3) Minor Adverse Impact – May require mitigation
- (4) Significant or potentially significant impact requiring avoidance or modification which may require an Environmental Impact Statement

Environmental Assessment Factor	Impact Code	Impact Evaluation
LAND DEVELOPMENT		
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	1	<p>The proposed programs would reimburse, rehabilitate, or reconstruct single-family homes in the same footprint or on the same parcel consistent with current local plans and zoning ordinances. Replacement of MHUs at new locations outside of the floodplain would still be in previously established MHU zones. All single-family housing projects will be rehabilitated/ reconstructed/ newly constructed in accordance with local land use and zoning ordinances. Housing density will not change, will comply with local planning ordinances, and be compatible with existing developments and compatible with nearby uses surrounding the site. Construction will be performed in conformance with local comprehensive plans and zoning ordinances.</p> <p>The contractor will obtain all permits from the appropriate departments prior to construction activities.</p>
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	2	<p>Rehabilitation reconstruction activities will be confined to the approximate existing building footprint.</p> <p>While the foundations are relatively flat, the contractor is required to implement erosion control measures during construction. Additionally, there will be no significant increase in impervious surfaces that could lead to increased stormwater runoff.</p> <p>New construction for the relocation of single-family homes</p>

		<p>including MHUs to another property that could result in a stick-built home will comply with all appropriate building codes and impervious cover regulations. All construction will meet building codes including the use of appropriate soil for the foundations.</p> <p>Reimbursement recipients will have no impact on soil, erosion, drainage, or storm water runoff conditions.</p>
Hazards and Nuisances including Site Safety and Noise	3	<p>Construction activities will occur on weekdays during normal business hours using heavy equipment and will be limited to the existing house sites for rehabilitation, reconstruction and reimbursement. New construction for the relocation of single-family homes to another property will include lots already zoned and dedicated to urban uses. The contractor is responsible for following all required construction safety precautions.</p> <p>Contractors will be required to provide health and safety plans and monitoring during construction.</p> <p>Contractors will be required to comply with the local and county noise ordinances and safety precautions. Noise impacts will be mitigated by restricting construction activities to daylight hours. The program is not expected to have impacts on long-term ambient noise levels as future noise levels at the home sites are expected to be similar to levels before the disasters occurred.</p> <p>Reimbursement recipients will not impact hazards and nuisances.</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
SOCIOECONOMIC		
Employment and Income Patterns	1	<p>Employment and income patterns in Sarasota County will be positively affected by the proposed programs. Retention of population and return of any displaced population of the disaster-impacted areas will return income base and employment as business activity returns to pre-disaster levels.</p> <p>Additionally, the proposed programs would help alleviate the financial burden from homeowners for the repair, reconstruction, or replacement of their home. Reimbursement recipients will not impact employment and income patterns.</p>

Demographic Character Changes, Displacement	2	The proposed programs will not significantly alter the demographic characteristics of the communities involved. These program activities will allow community members to return to their previous residences and communities and will not cause direct or indirect displacement. The programs will instead allow for the return of residents who had been displaced by the 2024 hurricanes. Reimbursement recipients will not impact the demographic character changes or displacement.
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Environmental Assessment Factor	Impact Code	Impact Evaluation
COMMUNITY FACILITIES AND SERVICES		
Educational and Cultural Facilities	2	The proposed rehabilitation, reconstruction, and minimal amount of new construction projects would result in null impacts to educational and cultural facilities in Sarasota County. The proposed actions would allow previous residents to return to their homes and communities. There will be no additional residences, only existing structures being repaired or reconstructed and new construction in infill lots in developed neighborhoods. Reimbursement activities will retain people in their homes and will not increase demand on educational or cultural facilities.
Commercial Facilities	2	<p>The proposed programs would allow previous residents to return to their homes in the disaster-impacted area, which would return demand for local goods and services to pre-disaster levels and would support local commercial facilities in providing services. Reimbursement recipients will not impact commercial facilities significantly.</p> <p>The businesses and commercial facilities that support the residential construction industry and its workforce could see a temporary increase in demand during implementation of the programs.</p>
Health Care and Social Services	2	The proposed programs would return residents to impacted areas and would not create new demand for health care and social services that did not exist before the hurricanes in 2024. Reimbursement recipients will not impact health care and social services significantly. It is expected that these facilities would be able to provide services at pre-disaster levels, after a period of adjustment. Therefore, no significant impacts to health care and social services are anticipated.

Solid Waste Disposal / Recycling	3	The demolition, construction, and/or remodeling of the structures shall generate some solid waste that shall be disposed of at a permitted solid waste facility rated for asbestos, lead and treated wood. After construction is complete, the project shall not generate solid waste beyond normal residential levels. Reimbursement recipients will not impact solid waste disposal and/or recycling.
Waste Water / Sanitary Sewers	2	<p>The proposed programs would return residents to impacted areas and would not create new demand for wastewater collection and treatment services that did not exist before the hurricanes occurred in 2024.</p> <p>Homes are expected to utilize existing sewer services or existing (or restored) septic systems if local codes allow. Systems will be repaired or replaced as needed to restore function and meet applicable local and county codes. Reimbursement recipients will not impact the wastewater or sanitary sewer systems.</p>
Water Supply	2	The returning homeowners will cause increases in the demand for water in the target area, however, the number of homes contributing to water supply demand will be similar to those that existed prior to the 2024 hurricanes. Reimbursement recipients will not impact the existing water supply significantly.
Public Safety - Police, Fire and Emergency Medical	2	The proposed programs would return residents to their homes in impacted areas and would not create new demand for public safety services including police, fire, and emergency medical that did not exist before the 2024 hurricanes. It is expected that these resources would be able to provide services at pre-disaster levels, after a period of adjustment. Reimbursement recipients will not impact public safety services.
Parks, Open Space and Recreation	2	<p>The proposed programs would return residents to their homes and would not introduce new residents to the impacted neighborhoods, therefore, there would be no change in demand for parks, open space, and recreation from pre-disaster levels.</p> <p>Construction activities would occur on previously zoned and developed lots and would have no impact on open spaces. Reimbursement recipients will not impact recreational areas.</p>
Transportation and Accessibility	2	The proposed programs consist of the rehabilitation, reconstruction, and reimbursement activities of disaster damaged homes and will not result in changes to public

		transportation relative to current conditions. The new construction activities will only geographically move the appropriate number of residents to a different area and will not create an increase in transportation utilization. Slight increases to ridership may occur on public transportation but would not substantively increase levels or demand relative to conditions prior to the 2024 hurricanes.
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Environmental Assessment Factor	Impact Code	Impact Evaluation
NATURAL FEATURES		
Unique Natural Features, Water Resources	2	The proposed programs consist of the rehabilitation and reconstruction of disaster-damaged houses or new construction in developed areas for MHU replacement and will occur on previously developed lots and would not have impacts on unique natural features or water resources. Reimbursement recipients will not have an impact on unique natural features or water resources.
Vegetation, Wildlife	2	Significant impacts to vegetation or wildlife due to rehabilitation, reconstruction, or new construction activities are not anticipated, although site-specific pre-construction biological surveys and/or monitoring during construction would be required if sensitive vegetation and wildlife species were observed during the Tier 2 onsite surveys. Reimbursement recipients will not have an impact on vegetation and/or wildlife.
Other Factors		N/A

Environmental Assessment Factor	Impact Code	Impact Evaluation
ENERGY		
Energy Efficiency	1	Resilient SRQ 2024 will adopt standards required by the State of Florida or the local government whichever is more stringent. These standards will be detailed in program guidelines in the reconstruction or replacement of damaged housing at or above the applicable building codes. Incorporating these improvements helps make structures more comfortable and supports long-term affordability through lower energy bills. For repairs, the County will use the Resilient SRQ 2022 standards to conform with its prior program under the revised consolidated notice.

Additional Studies Performed: None.

Field Inspection (Date and completed by):

Field Inspections will be completed at the Site-Specific level and will include photos, the HUD Field Visit checklist, the date performed as well as staff conducting the inspection.

List of Sources, Agencies and Persons Consulted [40 CFR 1508.9(b)]:

A Jerome Fletcher, II, ICMA-CM, MPA City Manager City of North Port 4970 City Hall Blvd North Port, FL 34286 jfletcher@northportfl.gov	Howard N. Tipton Town Manger Town of Longboat Key 501 Bay Isles Road Longboat, Key, FL 34228 Htipton@longboatkey.org
Edward F. Lavallee City Manager City of Venice City of Venice City Hall 401 West Venice Ave Venice, FL 34285 elavallee@venicefl.gov	Ntale Kajumba NEPA Section Chief U.S. Environmental Protection Agency, Region 4 61 Forsyth St. SW Strategic Program Office Atlanta, GA 30303 Kajumba.ntale@epa.gov
Rick Piccolo SRQ President Sarasota Manatee Airport Authority 6000 Airport Circle Sarasota, FL 34234-2105	Chris Stahl Clearinghouse Coordinator Florida State Clearinghouse State.clearinghouse@dep.state.fl.us
Diane Kennedy Code Compliance Manager – Air Quality City of Sarasota 1565 1 st Street Sarasota, FL 34236 (941) 236-6417 Diane.kennedy@sarasotafl.gov	Susan Dodd Historic Preservation Senior Planner, Planning Department City of Sarasota 1575 2 nd St. #432 Sarasota, FL 34236 Susan.dodd@sarasotaFL.gov
John Hickey, P.E. Manager – Air and Water Quality Sarasota County Planning and Development 1001 Sarasota Center Blvd Sarasota, FL 34240 jhickey@scgov.net	Chairman Talbert Cypress Jason Daniel, THPO Miccosukee Tribe of Indians Jasond@miccosukeetribe.com
Elizabeth Sweigert Assistant Director of District Management Florida Department of Environmental Protection South District Office 2295 Victoria Ave, Suite 364 P.O. Box 2549 Fort Myers, FL 33902 Elizabeth.Sweigert@FloridaDEP.gov	Chairman Marcellus W. Osceola Jr. Tina M. Osceola, THPO Seminole Tribe of Florida THPOcompliance@semtribe.com
Harry Klinkhamer Historical Resources Manager City of Venice 401 W Venice Ave Venice, FL 34285 Hklinkhamer@Venicefl.gov	Steven Cover Director of Planning City of Sarasota 1575 2 nd St, 4 th Floor Sarasota, FL 34236 Steven.cover@sarasotafl.gov

<p>Chief David Hill Dr. Savannah Hill, THPO Muscogee (Creek) Nation swaters@muscogeenation.com</p>	<p>Alissa Slade Lotane Director, Division of Historical Resources & State Historic Preservation Office State Historic Preservation Officer R.A. Gray Building 500 South Bronough Street Tallahassee, FL 32399 CompliancePermits@dos.myflorida.com</p>
<p>Renee Di Pilato Director Sarasota County Libraries and Historical Resources Management 1660 Ringling Blvd Sarasota, FL 34236 rdipilato@scgov.net</p>	<p>Christina Rimes Floodplain Manager City of Venice 401 West Venice Ave Venice, FL 34285 crimes@venicefl.gov</p>
<p>Dr. Josh Goodman, PhD. Sarasota County Libraries and Historical Resources jgoodman@scgov.net</p>	<p>Chris Oliver Environmental Specialist II Florida Department of Environmental Protection Florida State Parks, District 4 Administration 1843 South Tamiami Trail Osprey, FL 34229 James.oliver@dep.state.fl.us</p>
<p>Kristen Laursen NOAA Gulf of Mexico Regional Collaboration Support Specialist 263 13th Avenue South Saint Petersburg, FL 33701 Kristen.r.laursen@noaa.gov</p>	<p>David Greenbaum Chief Building Official & Floodplain Administrator City Hall, First Floor, Room 129 4970 City Hall Boulevard North Port, FL 34286</p>
<p>Cyndi Cahill, CFM City of Sarasota Floodplain Administrator 1565 1st St. Sarasota, FL 34236 Cynthia.Cahill@sarasotaFL.gov</p>	<p>Juan C. Hernandez State Conservationist 4500 NW 27th Avenue Building A Gainesville, FL 32606-7042 Juan.hernandez@usda.gov</p>
<p>Robert Samaan Regional Administrator Federal Emergency Management Agency 3003 Chamblee-Tucker Road Atlanta, GA 30341-4112 Robert.Samaan@fema.dhs.gov</p>	<p>Michael Deming Deputy Building Official and Floodplain Administrator Sarasota County Planning & Development Services Building Division 1001 Sarasota Center Blvd Sarasota, FL 34240 mdeming@sbcgov.net</p>
<p>Alaina D. Ray North Port Neighborhood Development Services City of North Port 4970 City Hall Blvd North Port, FL 34289</p>	<p>Mark Evans Jacksonville District Regulatory Section U.S. Army Corps of Engineers Floodplain Manager 701 San Marco Blvd Jacksonville, FL 32207-8175 SAJ-RD@usace.army.mil</p>
<p>Matthew Osterhoudt Director Air Quality & Water Manager – Planning and Development Services) 1600 Ringling Blvd Sarasota, FL 34236 mosterho@scgov.net</p>	<p>Mark Cervasio Airport Director Venice Municipal Airport 150 E Airport Ave Venice, FL 34285 mcervasio@venicegov.com</p>

Dave Bullock
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City of Sarasota
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Florida Department of Environmental Protection (Military Bases Maps)

<https://mapdirect-fdep.opendata.arcgis.com/datasets/military-bases/about>

National Plan of Integrated Airport Systems

https://www.faa.gov/sites/faa.gov/files/airports/planning_capacity/npias/current/ARP-NPIAS-2025-2029-Appendix-B.pdf

Sarasota County Property Appraiser Maps

<https://experience.arcgis.com/experience/86f63894cd9a45e2a6394df227d08e6e/>

Sarasota Bradenton International Airport Master Plan

<https://flysrq.com/sites/default/files/2022-07/Master%20Plan%202022.pdf>

Coastal Barrier Resources Mapper

<https://fwsprimary.wim.usgs.gov/CBRSMapper-v2/>

FEMA

<https://msc.fema.gov/portal/home>

NFIP Community Status Book

<https://www.fema.gov/flood-insurance/work-with-nfip/community-status-book>

EPA Nonattainment and Maintenance Area Map

<https://epa.maps.arcgis.com/apps/MapSeries/index.html?appid=7935a00e2554440a8daf6cc035b9455e>

Coastal Zone Management Act Mapper

<https://www.arcgis.com/apps/mapviewer/index.html?layers=776cb55084c549e0be8c8f6e91be24f9>

NEPAssist Mapper

<https://www.epa.gov/nepa/nepassist>

CDC Radon

<https://www.cdc.gov/environmental-health-tracking/php/data-research/radon-testing.html>

U.S. Fish And Wildlife IPaC

<https://ipac.ecosphere.fws.gov/>

HUD Exchange

<https://www.hudexchange.info/programs/environmental-review/>

U.S. Census Tiger Web

<https://tigerweb.geo.census.gov/tigerweb/>

Sarasota County Future Land Use

<https://data-sarco.opendata.arcgis.com/documents/0223ad25807f432d9792506dab18f32c/explore>

HUD Tribal Directory Assessment Tool

<https://egis.hud.gov/TDAT/>

EPA Sole Source Aquifers Interactive Map

<https://experience.arcgis.com/experience/1bfab371d71e4b868fc9ae7df62a16fe>

U.S. Fish and Wildlife Service Wetland Mapper

<https://www.fws.gov/program/national-wetlands-inventory/wetlands-mapper>

Nationwide Rivers Inventory Mapper

<https://experience.arcgis.com/experience/2b84b8786f5a4dea83c28debbe018be9>

Myakka River Management Coordinating Council

<https://myakkarivermanagement.org/>

Sarasota County Water Atlas

<https://sarasota.wateratlas.usf.edu/waterbodies/rivers/14609/>

Florida Legislature

http://www.leg.state.fl.us/statutes/index.cfm?App_mode=Display_Statute&URL=0200-0299/0258/Sections/0258.501.html

List of Permits Obtained: All necessary permits will be obtained at the site-specific level.

Public Outreach [24 CFR 50.23 & 58.43]: The county-wide 8-step decision-making process for floodplain and wetland actions was performed, which required the publication of 2 separate postings on Sarasota County's Resilient SRQ 2024 Storms website (<https://2024storms.resilientsrq.net/active-notice>); A posting of a combined notice of a Finding of No Significant Impact and Notice of Intent to Request the Release of Funds for Tiered Projects, and the Final Notice and Public Explanation of a Proposed Activity in a Federal Flood Risk Management Floodplain or Wetland, will be posted on Sarasota County Resilient SRQ's 2024 Storms website on August 14, 2025 for public review. These are presented in **Attachments K and O**.

[Home | Resilient SRQ 2024 Storms Debby, Helene and Milton](#)

Cumulative Impact Analysis [24 CFR 58.32]:

The federal Council on Environmental Quality's regulations implementing procedural provisions of NEPA are set forth in 40 CFR 1508.7. They require federal agencies to consider the environmental consequences of their actions, including not only direct and indirect effects, but also cumulative effects. Cumulative impacts result from incremental consequences of program actions when added to other past, present, and reasonably foreseeable future actions.

Based upon the completion of this environmental assessment, the review of the proposed project indicates that there will be no significant changes to the existing environmental conditions across the impact categories implemented by HUD in response to NEPA. The proposed program is to rehabilitate or reconstruct homes on existing residential lots, reimburse repairs already made by homeowners and if needed, replace manufactured housing units on alternate owned lots. The proposed program would have no impacts on energy, energy consumption, community facilities and services, transportation, and unique natural features. Any impacts identified would be required to be mitigated to minimize those impacts.

The project would result in beneficial impacts to comprehensive plans and zoning, compatibility and urban impact, hazards, and nuisances, including site safety, and visual quality.

Alternatives [24 CFR 58.40(e); 40 CFR 1508.9]

1: Alternate Method to Serve the Same Need: Development of multifamily complexes in lieu of restoration of destroyed properties and neighborhoods. Although this approach would minimize

the construction footprint, it could diminish the aesthetic appeal of the surrounding areas and compromise the sense of community cohesiveness and tranquility. This alternative was rejected because single-family homes offer more privacy and autonomy; individuals and families can own and build equity for the future. Restoring this area will ensure the affordable housing stock is not decimated and assist homeowners to recapture their equity and rebuild the local economy. Further, this does not assist those people who could stay in their homes with rehabilitation construction funds. There will be multifamily projects as part of this recovery effort, but they will not take the place of these neighborhood areas and will be placed in more appropriate areas zoned for multifamily.

2: Alternative technology or materials: Replace all lost units with manufactured housing units. Although this method would allow for a quicker replacement of homes, not all residents prefer this type of housing for disaster resilience, therefore this alternative was rejected. All stick-built homes will be replaced with stick-built homes that meet the latest elevation requirements and other resiliency requirements. All rehabilitation, reconstruction and new construction will meet current updated codes and requirements such as wind-storm guidelines and other measures to ensure a more resilient home to storms and their effects. Additionally, homes being rehabilitated that meet “substantial improvement/substantial damage” threshold will be elevated to the updated standards as required.

No Action Alternative [24 CFR 58.40(e)]:

Under the No Action Alternative, the Resilient SRQ 2024 Single-Family Housing Programs would not occur, and applicants would not receive assistance under the programs. This alternative was rejected because it would result in continued displacement of residents. This alternative does not achieve the Resilient SRQ 2024 goals of restoring storm damaged housing for its residents, nor does it promote planning and implementation of resilience measures to mitigate damage from future storms. In addition, abandoned structures may not be demolished, posing a lingering health and safety risk. The No Action Alternative does not address Sarasota County’s need for decent, safe, and sanitary housing for residents. Because of these reasons, the No-Action Alternative was not considered viable.

Summary of Findings and Conclusions:

A Tier 1 (Broad) review of this project has determined that it shall have No Significant Impact on the quality of the Human Environment. A Request for the Release of Grant Funds will be submitted to HUD. HUD’s release of the Authority to Grant Funds will have the provision that no activities may occur until the completion and approval of a Tier 2 (site-specific) review. To Ensure consistency, there will be three Tier 2 (site-specific) checklists: 1. Reimbursement Only, 2. Rehabilitation/Reconstruction and Reimbursement, 3. New Construction The following items were determined to need evaluation at the Tier 2 (site-specific) by activity.

1. Reimbursement Only

Tier 2: Flood Insurance.

2. Rehabilitation/Reconstruction and Reimbursement

Tier 2: Flood Insurance, Contamination and Toxic Substances, Endangered Species, Floodplain Management, Historic Preservation [SHPO Only], Wetlands Protection, and Wild and Scenic Rivers.

3. New Construction

Tier 2: Site Specific: Flood Insurance, Contamination and Toxic Substances, Endangered Species, Explosive and Flammable Hazards, Floodplain Management, Historic Preservation [SHPO Only], Noise Abatement and Control, Wetlands Protection, and Wild and Scenic Rivers.

Tier 2 Review Sample Forms can be found in **Attachments R, S, T.**

Mitigation Measures and Conditions [40 CFR 1505.2(c)]

Summarize below all mitigation measures adopted by the Responsible Entity to reduce, avoid, or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements, and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

Law, Authority, or Factor	Mitigation Measure
Clean Air Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	<i>Best Management Practices:</i> During project construction, there will be some increase in ambient dust particulate from machinery and soil disturbances. These will be only temporary in nature and all efforts will be made through proper construction methods to ensure dust control and properly functioning equipment. Contractors should ensure that best management practices are used to control runoff from construction sites to prevent detrimental impact to surface and ground water.
Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	<p>Native American tribes with potential cultural and traditional affiliations to Sarasota County [Miccosukee Tribe, Muscogee (Creek) Nation, and Seminole Tribe of Florida] were contacted for their initial concerns or impacts of the proposed projects on religious or cultural properties. Although these Tribes were contacted and no responses have been received to date of this review, we continue to appreciate any correspondence they offer and will work with them if they choose to inform us of any historically or culturally sensitive areas.</p> <p>If archeological deposits, including any stone tools, bones, pottery, or human remains, are uncovered, the project shall be halted, and the contractor shall stop all work immediately near the discovery and take reasonable measures to avoid or minimize harm to the findings. The site will be secured and access to the sensitive area restricted. The contractor will inform the Certifying Officer immediately and Sarasota County will consult with SHPO and other agencies as appropriate. Work in sensitive areas cannot resume until consultation is completed and appropriate measures have been taken to ensure that the project complies with National Historic Preservation Act (NHPA) and Native American Graves Protection Repatriation Act (NAGPRA).</p>
Endangered Species	<i>Best Management Practices:</i> <ul style="list-style-type: none">• The proposed project may result in the removal of

Endangered Species Act of 1973,
particularly section 7; 50 CFR Part 402

existing vegetation such as overgrown grass and shrubs. USFWS conservation measures will be followed to avoid activities that may disturb nesting and young during the primary nesting season (early April to mid-July). Any trees immediately adjacent to any of the proposed project areas should be considered for the potential of any active nests. Should any active nests be identified prior to construction activities, the USFWS Ecological Services Field Office and/or USFWS Regional Migratory Bird Management Office will be contacted for guidance on appropriate next steps to avoid and minimize impacts to (and take of) migratory birds.

- USFWS conservation measures will be followed to avoid activities that may disturb bats maternity season (mid-April to mid-August). Should any signs of potential bat presence (visually, bat guano, etc.) be identified prior to demolition or construction activities, the USFWS Ecological Service Field Office will be contacted on appropriate guidance to minimize impacts and properly handle.
- During construction, tree removal or trimming will be limited to the fullest extent possible. The presence of tree species on residential lots may have the potential to provide habitat to protected migratory species. If any migratory birds are observed on the subject property, all work shall cease immediately, and a professional wildlife biologist consulted for next steps.
- Avoid activities requiring vegetation removal or disturbance during peak bird nesting season (March through September) to prevent the destruction of migratory birds, nests, or eggs. When project activities cannot occur outside the bird nesting season, conduct surveys, within a reasonable time frame, prior to scheduled activity to determine if active birds, nests, or eggs are present within the area of impact. If evidence of migratory birds is found, a qualified biologist with USFWS should be notified. If nests are found, USFWS recommends leaving a buffer of vegetation (≥ 100 ft) around songbird nests detected until young have fledged or the nest is abandoned. All lighting should be down shielded

	and should follow the Dark Skies.
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Determination:

☒ **Finding of No Significant Impact** [24 CFR 58.40(g)(1); 40 CFR 1508.27]


The project will not result in a significant impact on the quality of the human environment.

☐ **Finding of Significant Impact** [24 CFR 58.40(g)(2); 40 CFR 1508.27]

The project may significantly affect the quality of the human environment.

Preparer Signature:  Date: 8/12/25

Name/Title/Organization: Brice Bloomer, Manager, GrantWorks Inc.

Preparer Signature:  Date: 8/12/25

Name/Title/Organization: Cynthia Zbranek, V.P. of Environmental Services, GrantWorks Inc

Certifying Officer Signature: **Steve Hyatt** Digitally signed by Steve Hyatt
Date: 2025.08.13 13:08:14
-04'00' Date: 8/13/25

Name/Title: Steve Hyatt, Division Manager, Sarasota County

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environmental Review Record (ERR) for the activity/project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).

APPENDIX: Site-Specific or Tier 2 Reviews

Update this document as site-specific reviews are completed. Complete each site-specific review according to the written strategies outlined in the broad-level review and attach it in the environmental review record.

[illegible]