



U.S. Department of Housing and Urban
Development

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Washington, DC 20410
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Environmental Assessment Determinations and Compliance Findings for HUD-assisted Projects 24 CFR Part 58

Project Information

Project Name: Orange County Homeowner Housing Rehabilitation and Reconstruction

Responsible Entity: Orange County, FL

Grant Recipient (if different than Responsible Entity): Orange County Housing and Community Development Division

State/Local Identifier:

Preparer: Krista Perry, HORNE, LLP

Certifying Officer Name and Title: Byron Brooks, County Administrator

Grant Recipient (if different than Responsible Entity):

Consultant (if applicable): HORNE, LLP

Direct Comments to: Inalbert Ramos
Program Manager
Housing and Community Development Division
Inalbert.ramos@ocfl.net

Project Location:

The proposed project is located in Orange County, Florida, including all of its thirteen municipalities. See Attachment A for the Project Location Map. Orange County is situated in the Florida Peninsula, bordered by Seminole County to the north, Osceola County to the south, Lake County to the west, and Brevard County to the east.

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

Under 24 CFR 58.15 (Tiering) and 24 CFR 58.32 (Project aggregation), Orange County will utilize a tiered approach for the environmental review. This broad level (Tier I) review covers rehabilitation and reconstruction activities provided by the Orange County Housing Rehabilitation Program and Community Block Grant Fund- Disaster Recovery (CDBG-DR) Program for Hurricanes Ian and Milton, and similar storm events or program activities, administered by the Orange County Housing and Community Development Division. When the site of an individual project is identified, a site-specific (Tier II) review will be completed for each subject property, prior to committing HUD funds to the project.

The Housing Rehabilitation Program is funded by a variety of federal and local funding sources, primarily the Community Development Block Grant (CDBG), HOME Investment Partnership Program (HOME), and the State Housing Initiatives Partnership Program (SHIP). The Program is designed to provide funds in the form of an interest free, deferred payment loan to qualified homeowners with needed repairs and/or rehabilitation to improve their health, safety and well-being, and to contribute to the structural integrity and preservation of their owner-occupied home.

Additionally, Orange County was allocated U.S. Department of Housing and Urban Development (HUD) CDBG-DR funding to support long-term recovery efforts following Hurricanes Ian and Milton.

Hurricanes Ian and Milton caused damage to many residential units in Orange County and the CDBG-DR program would rehabilitate homes damaged by Hurricanes Ian and Milton that are still in need of repairs.

The eligible program activities covered under this broad-level review include:

- **Rehabilitation:** Repair/rehabilitation of owner-occupied, single-family (1-4 units), homes. All activities would be limited to the disturbed area of the previously developed property/parcel.
- **Reconstruction:** Demolition and reconstruction of owner-occupied, single-family (1-4 units), homes deemed unrepairable. Structures would be reconstructed in a manner similar to the original and the number of dwelling units on the property would not be increased. Reconstruction would take place on the same site as the original structure and activities would be limited to the disturbed area of the previously developed property/parcel.
- **Replacement:** Demolition and replacement of owner-occupied mobile home units (MHUs). Replacement activities would take place at the same site as the original structure and activities would be limited to the disturbed area of the previously developed property/parcel.
- **MHU Relocation:** Replacement of owner-occupied MHUs, at an alternative residential property/parcel, when replacing the MHU at the same location is not feasible or is prohibited. The alternate location must be a previously developed residential property/parcel, zoned to allow for installation of a mobile home unit and have ready access to sewer, water, and electric connections. Additionally, the alternate site cannot be located in the 100-year or 500-year floodplain, as defined at 24 CFR 55.2(b)(11) and as defined at 24 CFR 55.2(b)(5), respectively.
- **Elevation:** Single-family homes (1-4 units) will be elevated as necessary in compliance with applicable federal, state, and local regulations or requirements.

- **Demolition:** Demolition, removal, and disposal of owner-occupied, single-family (1-4 units), homes or MHUs.

Homeowner housing rehabilitation and reconstruction activities would incorporate hazard mitigation measures, including green building standards, in the design and reconstruction of units. The use of more resilient construction materials is encouraged. Rehabilitation and reconstruction measures would aim to reduce the impact of future disasters and increase long-term sustainability and affordability of housing. All eligible housing rehabilitation or reconstruction activities would be required to meet a national objective under CDBG in accordance with HUD guidelines in 24 CFR 570.208.

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

Hurricane Ian was a strong Category 4 hurricane that made landfall in Florida on September 28, 2022, with effects that were felt across the State. In Orange County, Hurricane Ian brought approximately 16 inches of rain, resulting in significant flooding, road closures, and over \$300 million in major damage. Storm surges peaked between 8 to 10 feet, exacerbating the flooding for days after the hurricane passed. The flooding from Hurricane Ian had a profound impact on residential neighborhoods within Orange County. Homes located in low-lying areas or those near bodies of water experienced flooding, causing structural damage to their properties, and rendering some homes uninhabitable. Residents have been displaced, seeking refuge in emergency shelters or with friends and family.

Hurricane Milton made landfall as a Category 3 hurricane on October 9, 2024. The hurricane produced wind gusts reaching up to 87 mph in the County, causing damage to homes, businesses, and infrastructure, and downing trees and power lines. Additionally, parts of the County received over 10 inches of rain causing localized flooding. Additionally, the storm triggered 19 tornados and caused heavy rainfall of 10 to 15 inches, leading to localized flooding. Although the most significant impacts were felt in West and Southwest Orange County.

The CDBG-DR Programs will address remaining recovery needs from Hurricanes Ian and Milton through the rehabilitation of owner-occupied, single-family (1-4 units), homes in Orange County. CDBG-DR regulations require that the County meets or exceeds a 70 percent threshold benefiting LMI persons. Therefore, all program activities will prioritize households with incomes not exceeding 80 percent of the Area's Median Income (AMI), as published annually by HUD.

The Orange County Single-Family Homeowner Housing Rehabilitation and Reconstruction program would preserve existing housing stock and expand sustainable and affordable homeownership and rental opportunities for Orange County residents. The program offers technical and financial assistance to very low-income homeowners that are deemed urgent and necessary to ensure the immediate health and/or safety of the residents. The program will prioritize households with incomes not exceeding 80% of AMI, with special needs households eligible for up to 120% AMI.

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

Orange County is located in central Florida, United States. As of the 2020 census, its population was 1,429,908. In 2023, the population estimate was 1,471,416, making it the fifth most populous county in the state. The county seat is Orlando, with an estimated population of 320,742 as of the 2024 census, and the largest city. Orange County has observed continued population growth in recent years with a growing racial and ethnic citizen composition with 33% identifying themselves as Hispanic or Latino, 47% as White, 20% Black/African American, and remaining percentages as Other (U.S. Census Bureau).

Orange County is about 1,003 square miles, of which 100 square miles are covered by water. The county is a tourist, economic, and cultural hub for the Central Florida region. Orange County is divided into six

regions; the central Downtown area (with urban characteristics); the southwestern tourist strip (with a mixture of permanent dwellings, resorts, and hotels); mixture of working-class, middle-class, and wealthier suburbs in the west (with some exurban characteristics); more historically established suburbs to the north (with inner-ring characteristics); a mixture of suburbs with more accessibly priced homes in the east; and working-class neighborhoods and additional tourist attractions to the south.

Many properties in Orange County were either damaged, substantially damaged, or completely destroyed due to Hurricane Ian and Milton. Some property owners are repairing/reconstructing their homes as funds become available, while others have no available funds to complete needed repairs or reconstructions. Many property owners do not have the resources to repair, reconstruct, or relocate to less vulnerable areas.

Orange County Housing Rehabilitation Program and Community Block Grant Fund- Disaster Recovery (CDBG-DR) focuses on providing more energy-efficient, storm resistant, and physically accessible single-family housing, particularly for those who are low- and Moderate-Income (LMI), under or uninsured, and have not been able to complete their recovery will ensure that the structures are resilient and safe. CDBG-DR regulations require that the County meets or exceeds a 70 percent threshold benefiting LMI persons. Therefore, all program activities will prioritize households with incomes not exceeding 80 percent of the Area's Median Income (AMI), as published annually by HUD. With an Area Median Income of \$90,400 roughly 48.5% of the population is considered to be LMI.

The Orange County Single-Family Homeowner Housing Rehabilitation and Reconstruction program would preserve existing housing stock and expand sustainable and affordable homeownership and rental opportunities for Orange County residents. The program will prioritize households with incomes not exceeding 80% of AMI, with special needs households eligible for up to 120% AMI. The 2024 HUD Income Limits identify a one-person household at or below 80% of AMI as making \$54,050 annually, a two-person household at \$61,800 annually, a three-person household at \$69,500 annually, and a four-person household at \$77,200 annually with the area median-family income as \$90,400 as identified above. According to 2023 inflation-adjusted dollars within the past 12 months, 16.5% of households are making between \$50,000-\$70,499 and 12.8% of households are making between \$75,000-\$99,999. Depending on household size, that signals a significant portion of the Orange County population may be income eligible for the available programs. (Source: U.S. Census 2019-2023 American Community Survey 5-Year Estimates S1901).

Identifying the trends that are likely to continue in the absence of the proposed projects, Orange County will likely continue to see modest population growth due to historical data and the existing unsafe, damaged, and older housing stock will continue to deteriorate, decreasing the affordable single-family housing properties available for residents. Since the area is prone to natural disasters, it is further likely severe storms will continue to impact Orange County region in some capacity, thus continuing to affect the population as a whole and their future housing needs.

Funding Information

Grant Number	HUD Program	Funding Amount
B-24-UC-12-0003	CDBG-Orange County Housing Rehabilitation Program	\$7,338,797
B-23-UC-12-0003	CDBG-Orange County Housing Rehabilitation Program	\$7,350,003
B-22-UC-12-0003	CDBG-Orange County Housing Rehabilitation Program	\$7,278,950
B-21-UC-12-0003	CDBG-Orange County Housing Rehabilitation Program	\$7,592,647
B-23-UN-12-0003	CDBG-Orange County Recovers Hurricane Ian	\$219,712,000
B-25-UU-12-0005	CDBG-Hurricane Milton	\$33,357,000

Estimated Total HUD Funded Amount: \$282,629,397

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]: \$282,629,397

Compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities

Record below the compliance or conformance determinations for each statute, executive order, or regulation. Provide credible, traceable, and supportive source documentation for each authority. Where applicable, complete the necessary reviews or consultations and obtain or note applicable permits of approvals. Clearly note citations, dates/names/titles of contacts, and page references. Attach additional documentation as appropriate.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §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 and 58.6		
Airport Hazards 24 CFR Part 51 Subpart D	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The purpose of 24 CFR Part 51D is to promote compatible land uses around civil airports (commercial service) and military airfields. In accordance with 24 CFR 51.301(c), civil airports are defined as commercial service airports designated by the Federal Aviation Administration's National Plan of Integrated Airport Systems (NPIAS). Per the U.S. Environmental Protection Agency (EPA) NEPAassist tool, there are three airports

		<p>located within Orange County, the Orlando International Airport (MCO), the Orlando Executive Airport (ORL), and the Orlando Apopka Airport. According to the 2025-2029 NPIAS, only the Orlando International Airport (MCO) is a civil (commercial service) airport. There are no military airports located within Orange County.</p> <p>Compliance will be met during site-specific review. Site-specific reviews will determine if the site is within 2,500 feet of MCO. If the site is not within this distance, it complies with 24 CFR Part 51 Subpart D.</p> <p>If the site is within 2,500 feet of MCO, the review will identify if it is within a Runway Protection Zone/Clear Zone (RPZ/CZ). If it is within an RPZ/CZ, the site will be rejected. If the site is within 2,500 feet of MCO but not within the RPZ/CZ, it complies with 24 CFR Part 51 Subpart D as long as the structure is not reconstructed within the RPZ/CZ.</p> <p>Refer to site-specific reviews for compliance determination.</p> <p>See Attachment B for the Orange County Airport Map.</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>The purpose of the Coastal Barrier Resources Act is to minimize the damage to fish, wildlife, and other natural resources associated with the coastal barriers by restricting future Federal expenditures and financial assistance which have the effect of encouraging development of coastal barriers.</p> <p>Compliance with Coastal Barrier Improvement Act of 1990 [16 USC 3501] is met. The proposed project activities will have no effect on Coastal Barrier Resource Systems as there are no Coastal Barrier Resource Systems present in Orange County.</p> <p>No further assessment is required.</p> <p>Refer to Attachment C for the Orange County Coastal Barrier Resources Map.</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>The Flood Disaster Protection Act of 1973 requires that projects receiving federal assistance be covered by flood insurance if they are located in a Special Flood Hazard Area (SFHA), as designated by FEMA.</p> <p>Orange County currently participates in the National Flood Insurance Program (NFIP). However, three communities within Orange County do not participate in the NFIP, the Central Florida Tourism and Oversight District, the City of Bay Lake, and the City of Lake Buena Vista. The remainder of the communities within Orange County participate in the NFIP.</p> <p>Compliance will be met during site-specific reviews. Each property will be mapped at the site-specific level to determine NFIP requirements. If a project involves a structure located in a SFHA/100-year floodplain on the effective FEMA Flood Insurance Rate Map (FIRM), and the community is participating in the NFIP and in good standing, the homeowner would be required to obtain and maintain flood insurance. Flood insurance must be maintained in perpetuity for the life of the structure, regardless of transfer of ownership.</p> <p>HUD assistance may not be used in a special flood hazard area for projects located in a community not participating in or in good standing with the NFIP, or if the applicant had previously received Federal flood disaster assistance conditioned on obtaining and maintaining flood insurance and failed to be compliant.</p> <p>Refer to site-specific reviews for compliance determination.</p> <p>See Attachment D for the Orange County Special Flood Hazard Area Map.</p>
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STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 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>The Clean Air Act is administered by the EPA which sets National Ambient Air Quality Standards.</p> <p>Compliance with the Clean Air Act is met. The proposed project would not include new construction or conversion of land use facilitating the development of public, commercial, or industrial facilities or five or more dwelling units. Additionally, per the EPA Green Book, Orange County is not in non-attainment or maintenance status for any of the criteria pollutants listed below:</p> <ul style="list-style-type: none"> • Ozone (1-hour and 8-hour standards) • Carbon monoxide • Lead • Nitrogen dioxide • Sulfur dioxide • Particulate matter (2.5 micron and 10-micron standards) <p>No further assessment is required.</p> <p>See Attachment E for the EPA Florida Nonattainment/Maintenance Status Table and Counties "Nonattainment" or "Maintenance" Map.</p>
<p>Coastal Zone Management</p> <p>Coastal Zone Management Act, sections 307(c) & (d)</p>	<p>Yes No</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>The entire state of Florida is located within a Coastal Zone as defined in the Florida state Coastal Management Plan. As required by Executive Order 12372, the Florida State Clearinghouse, Office of Intergovernmental Programs, was contacted on February 19, 2025, regarding the potential coastal zone activities. The Florida State Clearinghouse response stated that they did not select the project for review. This satisfies the requirement of a Federal Coastal Consistency Determination.</p> <p>No further assessment is required.</p> <p>See Attachment F for Florida State Clearinghouse, Office of Intergovernmental Programs Consultation.</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>HUD policy requires that the proposed site and adjacent areas be free of hazardous materials, contamination, toxic chemicals and gases, and radioactive substances, where a hazard could affect the health and safety of occupants of the property or conflict with the intended utilization of the property.</p> <p>Compliance will be assessed during site-specific reviews. During the environmental review for each property, EPA and state databases will be examined to identify potential on-site and off-site facilities that could pose health and safety risks to occupants. These databases include the EPA's Enforcement and Compliance History Online (ECHO) database, the EPA's Superfund National Priorities List (NPL), and the EPA's Brownfields database. Additionally, information from the Florida Department of Environmental Protection (DEP) will be reviewed.</p> <p>An ECHO Database report will be generated to identify hazardous waste sites (RCRA) with a "non-compliance" status within 3,000 feet of the subject property. A table summarizing the findings for RCRA non-compliant sites, Superfund NPL sites, Brownfield sites, and Florida DEP cleanup sites within 3,000 feet of the subject property will be prepared and included in the site-specific review. The table will include a summary of the facility, any known contaminants, and an assessment of whether the hazardous facilities could affect the health and safety of property occupants or conflict with the intended use of the property.</p> <p>Radon</p> <p>On January 11, 2024, HUD published Notice CPD-23-103: Departmental Policy for Addressing Radon in the Environmental Review Process. Under this new policy notice, radon gas must now be considered in the contamination analysis required under HUD's contamination regulations at 24 CFR Part 58.5(i). Available science-based information may be used to determine whether the project site is located in an area that has average documented radon levels at or above 4 pCi/L. When conducting a scientific data review in lieu of testing, there must be a minimum of 10 (ten) documented test results over the previous 10 years for which data is available in a given county for the scientific</p>
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		<p>data review approach to be utilized. The Department of Health and Human Services, Centers for Disease Control and Prevention (CDC), National Environmental Public Health Tracking, Radon Testing map was utilized to determine if there is sufficient scientific data available for Orange County, and if the average documented radon levels for Orange County are below 4 pCi/L.</p> <p>According to the CDC National Environmental Public Health Tracking, Radon Testing map state data 7,177 buildings were tested in Orange County from 2014-2023 (the most recent 10-year period with available data) and the mean (average) pre-mitigation radon levels in tested buildings from 2014-2023 was 1.4 pCi/L. Because the scientific data review shows that the average pre-mitigation radon levels in buildings tested within Orange County is below the EPA's recommended action levels of 4.0 pCi/L, radon testing is not required during site-specific reviews.</p> <p>Asbestos, and Lead-Based Paint</p> <p>Structures in the Homeowner Housing Program may contain lead-based paint and/or asbestos containing materials. These are hazardous materials that could affect the health of residents.</p> <p>Federal asbestos regulations for testing and identification of asbestos apply to "facilities" as defined by those regulations. Single-family housing, having four or fewer dwelling units, does not meet this definition and is therefore exempt from the testing and identification requirements. However, all residential structures funded under the Program must comply with federal, state, and local laws and regulations regarding asbestos, if applicable, including but not limited to the following:</p> <ul style="list-style-type: none"> • National Emission Standard for asbestos, standard for demolition and renovation, 40 CFR 61.145; • National Emission Standard for Asbestos, standard for waste disposal for manufacturing, fabricating, demolition, and spraying operations, 40 CFR 61.150; • Florida Administrative Code and Florida Administrative Register: Rule Chapter 62-257: Asbestos Program.
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		<p>Housing units slated for rehabilitation that were constructed prior to 1978 will be tested for lead-based paint (LBP). When LBP requires abatement, clearance is required (per 24 CFR 35) after the completion of abatement or risk reduction activities, as required. If lead-based paint is found, it will be mitigated and/or removed in accordance with approved practices and the homeowner will be provided a copy of the LBP report and Notice of Evaluation or Presumption within 15 calendar days of receipt of report.</p> <p>Specifically, an LBP Risk Assessment (RA) will be conducted on the unit and the resident(s) provided with the distribution of the lead safe pamphlet, EPA Protect Your Family from Lead in Your Home. Both the inspection/RA report and the clearance report, including the copy of the LBP report and Notice of Evaluation or Presumption, will be provided to the property owner within 15 days of the final report being provided to the program.</p> <p>All activities must comply with applicable federal, state, and local laws and regulations regarding lead-based paint, including but not limited to:</p> <ul style="list-style-type: none"> • EPA's Repair, Renovation, and Painting (RRP) Rule (40 CFR 745.80(e)) • HUD's lead-based paint regulations in 24 CFR 35(a)(b)(h)(j)(r) • HUD's "Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing" <p>The Florida Department of Environmental Protection Central District was contacted on February 19, 2025, to provide the agency with the opportunity to provide comments and consult on the proposed project activities. No response was received.</p> <p>Refer to site-specific reviews for compliance determination.</p> <p>See Attachment G for the Orange County CDC Radon Data Review Table and the Florida Department of Environmental Protection Consultation Letter.</p>
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<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>The Endangered Species Act (ESA), as amended, and its implementing regulations mandate that federal agencies conserve threatened and endangered (T&E) species and ensure that any action they authorize, fund, or implement does not jeopardize the continued existence of a T&E species in the wild or destroy or adversely modify its critical habitat. Under Section 7 of the ESA, the environmental review must assess the potential impacts of HUD-assisted project activities on T&E species and critical habitats.</p> <p>The ESA is jointly administered by the Secretaries of the Interior and Commerce. The U.S. Fish and Wildlife Service (USFWS) is responsible for terrestrial and freshwater species and the National Marine Fisheries Service (NMFS) is responsible for marine species and anadromous fish, such as salmon. NMFS, also known as NOAA Fisheries, is an office of the National Oceanic and Atmospheric Administration (NOAA). Collectively referred to as the Services, these offices are responsible for listing species under their authority as threatened or endangered as appropriate. If an agency determines that a proposed action may affect one or more listed species, it must formally consult with the Service office or offices responsible for the affected species.</p> <p>The first step in complying with section 7 of the ESA is to determine whether the project includes any activities with the potential to affect any species or habitats. A No Effect determination can be made if none of the activities involved in the project have potential to affect species or habitats.</p> <p>Section 305(b)(2) of the Magnuson-Stevens Fishery Conservation and Management Act (MSA) requires Federal agencies to consult with NOAA Fisheries (NOAA-NMFS) on any action that they authorize, fund, or undertake that may adversely affect essential fish habitat (EFH). There is no designated EFH located within Orange County, therefore project activities will have no effect on NOAA designated EFH.</p> <p>According to the USFWS Information for Planning and Consultation (IPaC) website, there is currently no proposed or designated critical habitat for any species within Orange County.</p>
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		<p>Therefore, project activities will have no effect on critical habitat. However, there are 31 threatened, endangered, and candidate species in Orange County, and project activities have the potential to impact these species.</p> <p>The USFWS issued the <i>Clearance to Proceed with Federally-Insured Loan and Grant Project Requests</i> guidance and clearance letter on July 11, 2024, to assist federal agencies, state and local governments, and consultants in addressing Section 7 and National Environmental Policy Act (NEPA) environmental impact review requirements for federally insured loan and grant project requests. This guidance applies to all cities and unincorporated areas within the jurisdiction of participating Service field offices, including those in Florida. The letter outlines project activities that the Service considers to have no effect on species protected under the ESA. Most site-specific projects under the Homeowner Housing Programs would meet the criteria outlined in the letter and, therefore, would have no effect on T&E species or critical habitats.</p> <p>Compliance will be met during site-specific reviews. During the site-specific environmental review for each property, project activities will be reviewed to confirm they meet the covered activities in the USFWS <i>Clearance to Proceed with Federally-Insured Loan and Grant Project Requests</i> guidance and clearance letter. For projects that do not meet the criteria outlined in the USFWS clearance letter, a determination of effect will be conducted. If the proposed project is determined to <i>May Affect but is Not Likely to Adversely Affect</i> or <i>Likely to Adversely Affect</i> listed species, consultation with the USFWS South Florida Ecological Services Office will be initiated.</p> <p>The Bald Eagle (<i>Haliaeetus leucacephalus</i>), though no longer listed under the ESA, continues to be protected by the Bald and Golden Eagle Protection Act and the Migratory Bird Treaty Act (16 USC 703 et seq.).</p> <p>If proposed project activities would occur within 660 feet of an active or alternate bald eagle (<i>Haliaeetus 16 leucocephalus</i>) nest, work would not occur during nesting season (October 1 through May 15). If that limitation is not</p>
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		<p>possible, consultation with the Florida Fish and Wildlife Conservation Commission (FWC) would be required. To determine if the project area is within 660 feet of an active or alternate bald eagle nest, a visual inspection of the project parcel will be conducted. Any visible bald eagle nests must be documented, including their distance from the project site. Additionally, Audubon Florida's EagleWatch map, which documents bald eagle nests across the state, will be consulted.</p> <p>Site inspections will be completed on each property as part of the site-specific review, and the existing structure will be inspected for any native birds using the structure for nesting. If birds are found to be using the structure for nesting actions would be taken to avoid disturbing migratory birds or their, nests, eggs, or chicks as this could lead to a potential violation of the Migratory Bird Treaty Act. If project activities cannot be undertaken without disturbing migratory birds, consultation with the USFWS would be initiated.</p> <p>The Florida Fish and Wildlife Commission and the USFWS Florida Field Office were contacted on February 19, 2025, to provide the agencies with the opportunity to provide comments and consult on the proposed project activities. No response was received.</p> <p>Refer to site-specific reviews for compliance determination.</p> <p>See Attachment H for the USFWS <i>Clearance to Proceed with Federally-Insured Loan and Grant Project Requests</i> Guidance and Clearance Letter, Orange County IPAC Report, Critical Habitat Map, Essential Fish Habitat Map, and Agency Consultations.</p>
<p>Explosive and Flammable Hazards</p> <p>24 CFR Part 51 Subpart C</p>	<p>Yes No</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>Compliance with 24 CFR Part 51, Subpart C, is met. Proposed project activities will not involve the development, construction, or rehabilitation that increases residential densities, the conversion of existing structures or land, or the development of a hazardous facility—defined as a facility primarily used for storing, handling, or processing flammable or combustible chemicals, such as bulk fuel storage facilities and refineries.</p> <p>No further assessment is required.</p>

		See Attachment I for the HUD Explosive and Flammable Hazards Worksheet.
Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	Yes No <input checked="checked" type="checkbox"/> <input type="checkbox"/>	<p>The purpose of the Farmland Protection Policy Act (7 U.S.C. 4201 et seq, implementing regulations 7 CFR Part 658, of the Agriculture and Food Act of 1981, as amended) is to minimize the effect of Federal programs on the unnecessary and irreversible conversion of farmland to nonagricultural uses. The Act does not apply to projects already in or committed to urban development or those that could otherwise not convert farmland to nonagricultural uses.</p> <p>Compliance with the Farmland Protection Policy Act is met. Project activities under the Orange County Housing Rehabilitation Programs would not convert farmland to non-agricultural uses. Rehabilitation and reconstruction activities would occur on the same site as the existing storm-damaged structure, while the replacement of manufactured housing units (MHUs) at an alternate location would take place on previously developed lots zoned for MHU installations, where all existing utility connections and systems are already in place.</p> <p>No further assessment is required.</p> <p>See Attachment J for the HUD Farmland Protection Worksheet.</p>
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	Yes No <input type="checkbox"/> <input checked="checked" type="checkbox"/>	<p>HUD regulations require compliance with Executive Order (EO) 11988- Floodplain Management, as amended by EO 13690- Establishing a Federal Flood Risk Management Standard (FFRMS) and a Process for Further Soliciting and Considering Stakeholder Input.</p> <p>EO 11988 requires federal activities to avoid impacts to floodplains and to avoid direct and indirect support of floodplain development to the extent practicable. EO 13690, revised EO 11988 and established a new FFRMS to address current and future flood risk, improve resiliency, and ensure that projects funded with taxpayer dollars last as long as intended.</p> <p>Compliance will be met during site-specific reviews. Project activities will rehabilitate, reconstruct, or replace, owner-occupied single-family homes on previously developed residential properties. Project activities would not include a critical action, such as projects</p>

	<p>involving hospitals, fire and police stations, nursing homes, hazardous chemical storage, storage of valuable records, and utility plant.</p> <p>Each subject property will be evaluated for its proximity to the FFRMS floodplain at the site-specific level using FEMA issued Flood Insurance Rate Maps (FIRMs). The Freeboard Value approach or the 0.2-Percent-Flood Approach (0.2PFA) will be used to determine if the site-specific project area is within the FFRMS floodplain.</p> <p>Homes located in 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 two (2) feet above the most applicable Base Flood Elevation.</p> <p>When replacement of an MHU is not feasible at the same location as the original structure, the MHU will be replaced at an alternative location. The alternate location must be a previously developed residential property/parcel, zoned to allow for installation of an MHU and have ready access to sewer, water, and electric connections. Additionally, the alternate site cannot be located in the FFRMS floodplain.</p> <p>If HUD Floodplain Management regulations or guidance change and become applicable to these programs, the Floodplain Management compliance review conducted during site-specific (Tier II) reviews will be updated accordingly to ensure full compliance with the latest requirements.</p> <p>A programmatic eight-step wetland/floodplain decision-making analysis was performed for the project to determine practicable alternatives to providing assistance in these areas. This analysis is provided in Attachment K and contains a review of alternatives. The selected alternative, Alternative 1, allows for the rehabilitation and reconstruction of homes located in the FFRMS floodplain.</p> <p>The early floodplain notice was published was published on the Orange County Government website (https://www.ocfl.net/NeighborsHousing/OCDisasterRecovery/EnvironmentalNotice.aspx and https://www.orangecountyfl.net/NeighborsHousing.aspx) from February 24, 2025, through March</p>
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		<p>11, 2025. No comments were received on the early floodplain notice. The final floodplain notice was published on the Orange County Government website (https://www.ocfl.net/NeighborsHousing/OCDisasterRecovery/EnvironmentalNotice.aspx and https://www.orangecountyfl.net/NeighborsHousing.aspx) from March 24, 2025, through April 1, 2025. No comments were received on the final floodplain notice</p> <p>Refer to site-specific reviews for compliance determination.</p> <p>See Attachment K for the Flood Zones Map, National Wetlands Inventory Map, 8-Step decision Making Process, and the Early and Final Floodplain/Wetland Notices</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>Compliance will be achieved during the site-specific review, as described below.</p> <p>Section 106 of the National Historic Preservation Act of 1966 (NHPA), as amended, requires the lead federal agency with jurisdiction over a federally-funded or federally-licensed activity to consider impacts to historic properties before approving a project. The Section 106 review process is detailed in 36 CFR Part 800 and will be followed during Tier Program activities.</p> <p>At the time of this Tier I, there is no HUD Amendment to the <i>Programmatic Agreement Among The Federal Emergency Management Agency, The Florida State Historic Preservation Office, The Florida Division Of Emergency Management, And Alabama Coushatta Tribe Of Texas, Choctaw Nation Of Oklahoma, Mississippi Band Of Choctaw Indians; And The Advisory Council On Historic Preservation</i> (PA) that includes Orange County, however this is being actively pursued. If this is successful, the Section 106 process as outlined in the PA will be followed.</p> <p>Compliance will be met during site-specific reviews. Site-specific standard consultation with the Florida State Historic Preservation Office (SHPO) will be necessary to determine if the proposed project has the potential to affect historic properties (above or below-ground resources). This applies to all proposed project activities for the program and will be required regardless of the age of the property.</p>

		<p>Certified Local Governments within Orange County (City of Orlando, City of Winter Park, Town of Eatonville, and Town of Windermere) were contacted via email on February 24, 2025 (letters dated February 20, 2025). The City of Orlando and the City of Winter Park responded within the 30-day comment period as required by Section 106 that they would like to be included in the process when applicable for their jurisdictions. No responses we received from the Town of Eatonville nor the Town of Windermere. Any site-specific comments provided by the City of Orlando and the City of Winter Park, especially to mitigate potential adverse effects, will be addressed by Orange County in the site-specific (Tier II) reviews.</p> <p>Native American tribes with potential cultural and traditional affiliations to Orange County (Coushatta Tribe of Louisiana, Miccosukee Tribe of Indians, Muscogee Creek Nation, and Seminole Nation of Oklahoma) were contacted via email on February 19, 2025 (letters dated February 18, 2025). None of the Tribes consulted responded following a 30-day comment period as required by Section 106.</p> <p>Refer to site-specific reviews for compliance determination.</p> <p>See Attachment K for the Florida SHPO, Certified Local Government, and Tribal Consultation letters.</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 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, per 24 CFR Part 51.101(a)(3).</p> <p>The CDBG-DR program for Hurricanes Ian and Milton would repair or reconstruct/replace disaster damaged or destroyed homes substantially as they existed prior to the hurricane or replace MHUs on an alternate existing residentially developed site, thus a previously existing noise-sensitive (residential) land use. Therefore, all project activities under the Hurricane Ian and Milton CDBG-DR</p>

		<p>programs would be exempt from HUD Noise and Abatement Control requirements.</p> <p>No further assessment is required for projects completed under the CDBG-DR program for Hurricanes Ian and Milton.</p> <p>Compliance will be met during site-specific reviews for project activities under the Orange County Housing Rehabilitation Program. Since these projects are not conducted under disaster assistance provisions, they are subject to HUD's Noise Abatement and Control requirements.</p> <p>For modernization projects in all noise zones, HUD encourages mitigation to reduce levels to acceptable compliance standards. For rehabilitation projects that include window replacements, Orange County will implement a standardized noise attenuation measure. When the rehabilitation scope includes window replacements, they must be upgraded to double-pane windows to enhance the building's noise attenuation capabilities.</p> <p>For major or substantial rehabilitation in Normally Unacceptable zones, HUD encourages mitigation to reduce levels to acceptable compliance standards. For major or substantial rehabilitation projects a preliminary screening will be conducted for each site-specific review to identify potential noise generators within 1,000 feet of a major road, 3,000 feet of a railroad, or 15 miles of a military or FAA-regulated civil airfield. If noise generators are found within these threshold distances, a noise assessment using the HUD Day/Night Noise Level (DNL) Calculator tool will be completed to determine the project's noise zone.</p> <p>For major or substantial rehabilitation projects in the Normally Unacceptable and Unacceptable noise zones, Orange County will evaluate the feasibility of incorporating noise attenuation features based on the extent and nature of the rehabilitation and the level of exterior noise exposure.</p> <p>Refer to site-specific reviews for compliance determination for projects completed under the Orange County Housing Rehabilitation Program.</p>
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<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>Orange County is partially located within the Biscayne Sole Source Aquifer (SSA) and its recharge zones. The Memorandum of Understanding (MOU) between EPA Region 4 and HUD Region 4 regarding the EPA's review of HUD-funded projects within sole source aquifers provides guidance on the types of projects that are presumed not to pose a significant hazard to public health through contamination of an SSA and therefore do not require referral to the EPA for review.</p> <p>According to Attachment B, Bullet 2, projects involving "new construction, acquisition, or rehabilitation of residential housing with no more than four dwelling units" are exempt from EPA review. Since the project activities involve single-family housing (1-4 units) only, site-specific projects located within the SSA would not need to be referred to the EPA for review. Therefore, compliance with the Safe Drinking Water Act is met</p> <p>No further assessment is required.</p> <p>See Attachment M for the Sole Source Aquifer Map and the MOU Regarding EPA Review of HUD Financial-Assisted Projects Within Sole Source Aquifers.</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>Executive Order 11990 requires Federal activities to avoid adverse impacts to wetlands where practicable. Orange County contains approximately 250,511 acres designated as wetlands on the USFWS National Wetlands Inventory. Project activities include rehabilitation, reconstruction and replacement of single-family homes. Project activities would take place on previously developed residential properties and are not expected to result in any new permanent direct or indirect impacts to wetlands.</p> <p>Compliance will be met during site-specific reviews. Each site-specific project area will be evaluated for the potential presence of and proximity to wetland resources. When a project is within or adjacent to a designated wetland, best management practices for soil erosion and stormwater management will be applied as appropriate for protection of wetlands.</p>

		<p>A programmatic eight-step wetland/floodplain decision-making analysis was performed for the project to determine practicable alternatives to providing assistance in these areas. This analysis is provided in Attachment K and contains a review of alternatives. The selected alternative, Alternative 1, allows for the rehabilitation and reconstruction of homes located in designated wetlands.</p> <p>The U.S. Army Corps of Engineers- Jacksonville District was contacted on February 19, 2025, to provide the agency with the opportunity to provide comments and consult on the proposed project activities. A response from the USACE was not received. The USACE-Jacksonville District will be consulted for site-specific (Tier II) reviews of proposed projects located in an NWI-designated wetland that would substantially alter the disturbed footprint of single-family homes (such as through reconstruction activities) to determine if a USACE permit is required.</p> <p>Refer to site-specific reviews for compliance determination.</p> <p>See Attachment K for the Flood Zones Map, National Wetlands Inventory Map, 8-Step decision Making Process, and the Early and Final Floodplain/Wetland Notices</p> <p>Attachment N for the U.S. Army Corps of Engineers- Jacksonville District Consultation Letter.</p>
<p>Wild and Scenic Rivers</p> <p>Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The Wild and Scenic Rivers Act (16 U.S.C. 1271–1287) provides federal protection for certain free-flowing, wild, scenic, and recreational rivers designated as components or potential components of the National Wild and Scenic Rivers System (NWSRS). The NWSRS was established by Congress in 1968 to preserve rivers with outstanding natural, cultural, and recreational values in a free-flowing condition for the enjoyment of present and future generations. The environmental review must evaluate the potential to impact any listed Wild and Scenic River when the assisted project is within proximity to a listed natural resource</p> <p>Compliance will be met during site-specific reviews. Segments of the Wekiva River, located in the northern portion of Orange County, have</p>

		<p>been designated as wild and scenic. Consultation with the appropriate agency would occur during the site-specific (Tier II) review if a proposed project site is within proximity (0.25-mile from the rivers bank) to the designated segment of the Wekiva River and has the potential to have a direct and adverse effect within Wild and Scenic River Boundaries.</p> <p>The proposed project activities would not invade the area or unreasonably diminish the river outside Wild and Scenic River Boundaries, since the project activities would be completed on previously developed residential properties and no in water work will be completed.</p> <p>Additionally, the National Park Service has compiled and maintains the National Rivers Inventory (NRI), a register of river segments that potentially qualify as national wild, scenic or recreational river areas. Segments of the Econlockhatchee River and the St. Johns River, within Orange County, are listed on the NRI.</p> <p>Consultation with the appropriate agency would occur during the site-specific (Tier II) review if a proposed project site is within proximity (0.25-mile from the rivers bank) to the listed segment of the Econlockhatchee River or St. Johns River and has the potential to have an adverse effect on the natural, cultural, and/or recreational values of an NRI segment.</p> <p>Since the proposed project activities do not involve work that could affect the free-flowing condition of a wild and scenic river—such as the construction of dams, water diversion projects, bridges, roadway construction or reconstruction, boat ramps, or activities requiring a Section 404 permit from the Army Corps of Engineers—direct and adverse effects within Wild and Scenic River boundaries or adverse effects on the natural, cultural, and/or recreational values of a NRI segment are unlikely.</p> <p>Refer to site-specific reviews for compliance determination.</p> <p>See Attachment O for the Wild and Scenic River Map.</p>
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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	2	<p>The proposed activities include the rehabilitation, reconstruction, and/or elevation of single-family homes within the existing structure footprint or on the same parcel, in accordance with current local plans and zoning ordinances. Additionally, the proposed activities would involve the replacement of MHUs on previously disturbed and developed residential parcels.</p> <p>Housing density would remain unchanged and would comply with local planning ordinances, ensuring compatibility with existing developments and surrounding land uses. All construction would conform to local comprehensive plans and zoning regulations. The proposed action sites would maintain their current land use, ensuring consistency with the surrounding and existing land uses. The contractor will secure all necessary permits from the appropriate agencies before initiating any demolition or construction activities.</p>
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	2	<p>Rehabilitation activities would not alter the suitability of the soils for foundations. Any soil suitability issues that may have affected the previously constructed buildings should have been addressed during the initial construction or through ongoing building maintenance.</p> <p>If the proposed action includes replacement of an MHU on an alternate property, soil suitability will be assessed prior to reconstruction/replacement activities and addressed during the local permitting process.</p>

		For proposed reconstruction activities, the parcel will be evaluated prior to construction, and best management practices will be implemented to minimize potential erosion impacts, particularly in areas with slope conditions.
Hazards and Nuisances including Site Safety and Noise	2	<p>Orange County is affected by flooding from weather events. Flood risks are primarily addressed in the Floodplain Management section. However, project rehabilitation and reconstruction measures would aim to reduce the impact of future disasters and enhance the long-term sustainability and affordability of housing.</p> <p>Homes located in the 100-year or 500-year floodplain that receive assistance for reconstruction, substantial damage repair, or substantial improvement will be elevated to reduce the risk of future flooding. If replacing a manufactured housing unit (MHU) at the original location is not feasible, the MHU will be relocated to an alternative site outside the FFRMS floodplain and wetland.</p> <p>Project activities will not involve the development or construction of a noise-generating facility. However, proposed activities may temporarily increase ambient noise levels around each construction site. These temporary noise impacts will be mitigated to the extent feasible using standard construction best management practices. The program is not expected to have long-term impacts on ambient noise levels, as future noise levels at the home sites are expected to remain consistent with current levels.</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
SOCIOECONOMIC		
Employment and Income Patterns	1	The proposed project is not anticipated to significantly increase or decrease employment opportunities in Orange County. However, project activities are anticipated to have a minor beneficial impact through the creation of temporary construction jobs. Additionally, the 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.
Demographic Character Changes, Displacement	2	<p>The proposed project activities would not significantly alter the demographic characteristics of the affected communities. Most activities would enable community members to remain in their current residences or allow displaced residents to return to their previous homes and communities. Additionally, the proposed program would not cause direct or indirect displacement.</p> <p>If the proposed action includes the replacement of an MHU on an alternate property, the alternate site must be a previously</p>

		<p>developed residential parcel. The number of MHU replacements on alternate properties is not expected to significantly alter the demographics of the affected communities.</p> <p>Residential, commercial, and industrial land uses would remain unchanged, as the proposed activities will be conducted on parcels already designated for residential use. The project would not create physical barriers or restrict access to local services, facilities, institutions, or other parts of the city, ensuring that neighborhood connectivity remains intact.</p> <p>The proposed project involves the rehabilitation, reconstruction, or replacement of single-family homes. Homeowners may need to temporarily relocate during construction but will be able to return to their homes immediately upon completion of the work.</p>
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Environmental Assessment Factor	Impact Code	Impact Evaluation
COMMUNITY FACILITIES AND SERVICES		
Educational and Cultural Facilities	2	<p>The proposed project activities are not expected to impact educational or cultural facilities in Orange County. Most project activities would allow community members to remain in their current residences or enable displaced residents to return to their previous homes and communities. An increase in student population is not anticipated, as no new residences are being added. Additionally, the number of MHU replacements on alternate properties is not expected to significantly affect student enrollment.</p>
Commercial Facilities	2	<p>Most of the proposed project activities would help community members remain in their current residences or enable displaced residents to return to their previous homes and communities. Therefore, the project would not affect the proximity of site-specific project locations to existing commercial facilities.</p> <p>In cases involving MHU relocations, the applicant will select the alternative site. This would allow the homeowner to ensure that the new site meets their needs, such as walkability and access to public services, retail services, and essential services like grocery stores.</p>
Health Care and Social Services	2	<p>Most of the proposed project activities would help community members remain in their current residences or enable displaced residents to return to their previous homes and communities. Therefore, the project is not expected to affect the proximity of site-specific project locations to existing emergency and non-emergency health care services. Additionally, since the project does not involve adding new housing or residences within the</p>

		<p>project area, it is not anticipated to increase demand for local health care or social services.</p> <p>For MHU relocations, the applicant will select an alternative site. This allows the homeowner to ensure that the new site meets their needs, including accessibility to emergency and non-emergency health care services. Furthermore, the alternative site must be a previously developed residential property or parcel, zoned to permit the installation of a mobile home unit. Therefore, MHU relocations are not anticipated to increase demand for local health care or social services</p>
Solid Waste Disposal / Recycling	3	<p>The proposed project may temporarily increase the generation of construction waste; however, it is not expected to exceed the capacity of local waste disposal facilities or landfills. The General Contractor assigned to each site-specific project will be responsible for managing and disposing of construction waste at a landfill with sufficient capacity to handle the debris.</p> <p>Additionally, the proposed project activities would help community members remain in their current residences or enable displaced residents to return to their previous homes. As a result, the project is not expected to create new demand for long-term solid waste or recycling collection and disposal services.</p>
Waste Water / Sanitary Sewers	2	<p>Since most of the proposed project activities would help community members remain in their current residences or enable displaced residents to return to their previous homes, the project would not create new demand for wastewater collection and treatment services. Additionally, MHU replacements at an alternative site are expected to utilize existing sewer service or existing (or restored) septic systems. Any existing septic systems will be inspected to ensure they function properly. Systems will be repaired or replaced as needed to restore function and meet applicable local and county codes.</p>
Water Supply	2	<p>Since most of the proposed project activities would help community members remain in their current residences or enable displaced residents to return to their previous homes, the project is not expected to create new demand for water.</p> <p>Additionally, MHU replacements at alternative sites are expected to use existing water supply connections. Therefore, the number of homes contributing to water supply demand is not anticipated to change.</p>
Public Safety - Police, Fire and Emergency Medical	2	<p>Since most of the proposed project activities would help community members remain in their current residences or enable displaced residents to return to their previous homes, the project is not expected to create new demand for public safety services, including police, fire, and emergency medical services.</p>

		Additionally, the number of MHU replacements on alternative properties is not expected to significantly increase the population in the surrounding area. Therefore, no significant impacts on public safety services are anticipated.
Parks, Open Space and Recreation	2	The proposed project activities would not introduce new residents to Orange County, therefore there would be no change to the demand for parks, open space, and recreation. Additionally, construction activities would occur on previously zoned and developed lots and would not adversely impact open space.
Transportation and Accessibility	2	The proposed project would not result in changes to public transportation, site access, transportation safety, or the level of service compared to current conditions. Therefore, the project is not expected to impact the local or regional transportation system.

Environmental Assessment Factor	Impact Code	Impact Evaluation
NATURAL FEATURES		
Unique Natural Features, Water Resources	2	The proposed activities would occur on previously developed residential properties and would not create new impacts to unique natural features such as geological features that are rare or of special social/cultural, economic, educational, aesthetic, or scientific value.
Vegetation, Wildlife	2	The proposed activities would occur on previously developed residential properties and are not anticipated to create significant impacts to vegetation or wildlife. Project activities would not introduce nuisance or non-indigenous species of vegetation, implement landscape maintenance actions such as pesticide usage or fertilization, damage or destroy existing remnant or endemic plant communities, harm or destroy plant species legally protected by state or local ordinances, create special hazards for animal life, or damage or destroy existing wildlife habitats.

Environmental Assessment Factor	Impact Code	Impact Evaluation
ENERGY		
Energy Efficiency	1	All rehabilitation, reconstruction, and replacement activities assisted with CDBG-DR funds must achieve a minimum energy efficiency standard, which may include certifications such as ENERGY STAR (Certified Homes), DOE Zero Energy Ready Home, EarthCraft House, EarthCraft Multifamily, Passive House Institute Passive Building or EnerPHit certification from the Passive House Institute US (PHIUS) or the International Passive House Association, Greenpoint Rated New Home,

		<p>Greenpoint Rated Existing Home (Whole House or Whole Building label), Earth Advantage New Homes, or any other equivalent energy efficiency standard acceptable to HUD.</p> <p>Rehabilitation and reconstruction activities under the Housing Rehabilitation Program will improve the energy efficiency of rehabilitated homes and, to the extent feasible, incorporate green building features throughout the home.</p> <p>Since most of the proposed project activities would help community members remain in their current residences or enable displaced residents to return to their previous homes and would reduce energy use when feasible, the proposed project is expected to have a minor beneficial impact on the energy efficiency of the housing stock in Orange County.</p>
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Additional Studies Performed: There were no additional studies performed as part of this Tier I Review.

Field Inspection (Date and completed by): Field inspections will be conducted at the site-specific level as individual project locations are identified and documented within the Tier II Site-Specific Environmental Review.

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

The following agencies and Tribes were consulted for this Tier I Review.

Agency	Contact Information
Florida State Clearinghouse Florida Department of Environmental Protection	Via E-Mail: state.clearinghouse@floridadep.gov Chris Stahl Florida State Clearinghouse Florida Department of Environmental Protection 3800 Commonwealth Boulevard, M.S. 47 Tallahassee, Florida 32399-2400
Florida Fish and Wildlife Commission	Via E-Mail: executivedirector@myfwc.com Roger Young, Executive Director Florida Fish and Wildlife 620 South Meridian Street Tallahassee, FL, 32399-1600
USFWS Florida Field Office	Via E-Mail: FW4FLESRegs@fws.gov U.S. Fish and Wildlife Service South Florida Ecological Services Field Office 1339 20th Street Vero Beach, FL, 32960-3559
Florida Department of Environmental Protection: Central District	Via E-Mail: DEP_CD@FloridaDEP.gov Florida Department of Environmental Protection Central District 3319 Maguire Boulevard Orlando, FL 32803

US Army Corps of Engineers- Jacksonville District	Via E-Mail: saj-rd-s@usace.army.mil Jacksonville District Regulatory Division United States Army Corps of Engineers 701 San Marco Boulevard Jacksonville, Florida 32207-8175
Florida State Historic Preservation Office	Via E-Mail: CompliancePermits@dos.myflorida.com Alissa Slade Lotane Director Division of Historic Resources and State Historic Preservation Officer Florida Department of State 500 South Bronough Street, Room 305 Tallahassee, FL 32399-2100
City of Orlando-Certified Local Government	Via E-Mail: jennifer.fritz-hunter@orlando.gov Jennifer Fritz-Hunter City of Orlando 400 South Orange Avenue Orlando, Florida 32801
Town of Eatonville-Certified Local Government	Via E-Mail: vking@townofeatonville.org Veronica King Town of Eatonville 307 East Kennedy Boulevard Eatonville, Florida 32751
Town of Windermere-Certified Local Government	Via E-Mail: rsmith@town.windermere.fl.us Robert Smith Town Manager Town of Windermere 614 Main Street Windermere, Florida 34786
Town of Winter Park-Certified Local Government	Via E-Mail: amcgillis@cityofwinterpark.org Allison McGillis Director, Planning & Zoning City of Winter Park 401 Park Avenue South Winter Park, Florida 32789
Coushatta Tribe of Louisiana	Vice Chair Crystal Williams Email: mbell@coushatta.org
Miccosukee Tribe of Indians	The letter was addressed to Chairman Talbert Cypress. Email: marlap@miccosukeetribe.com Jason Daniel, Historic Preservation officer is cc'd. Email: jasond@miccosukeetribe.com
Muscogee (Creek) Nation	The letter was addressed to Principal Chief David Hill. Email: section106@muscogeenation.com Turner Hunt, Tribal Historic Preservation officer is cc'd. The listed email in HUD's Tribal Directory Assessment Tool (TDAT) is the same as for the Principal Chief.
Seminole Tribe of Florida	The letter was addressed to Chairman Marcellus Osceola. Email: chairman@semtribe.com Tina Marie Osceola, Tribal Historic Preservation officer is cc'd. Email: tinaosceola@semtribe.com

Data Sources:

CDC National Environmental Public Health Tracking Network:

<https://ephtracking.cdc.gov/DataExplorer/?c=31>

EPA NEPAAssist Tool: <https://www.epa.gov/nepa/nepassist>

EPA Nonattainment Areas for Criteria Pollutants (Green Book): <https://www.epa.gov/green-book>

EPA Sole Source Aquifers Map:

<https://epa.maps.arcgis.com/apps/webappviewer/index.html?id=9ebb047ba3ec41ada1877155fe31356b>

FEMA Flood Map Service Center: <https://msc.fema.gov/portal/home>

FEMA, Florida Community Status Book Report: Communities Participating in the National Flood Program: <https://www.fema.gov/cis/FL.html>

Florida Coastal Zone Management Program: <https://floridadep.gov/rcp/fcmp>

HUD Tribal Directory Assessment Tool: <https://egis.hud.gov/TDAT/>

National Park Service Nationwide Rivers Inventory: <https://www.nps.gov/subjects/rivers/nationwide-rivers-inventory.htm>

National Plan of Integrated Airport Systems: https://www.faa.gov/airports/planning_capacity/npia

NOAA Coastal Zone Management Programs: <https://coast.noaa.gov/czm/mystate/#florida>

NOAA Essential Fish Habitat Mapper: https://www.habitat.noaa.gov/apps/efhmapper/?page=page_8

USFWS Coastal Barrier Resources System Mapper: <https://fwsprimary.wim.usgs.gov/cbrs-mapper-v2/>

USFWS IPaC Information for Planning and Consultation: <https://ipac.ecosphere.fws.gov/>

USFWS National Wetlands Inventory: <https://www.fws.gov/program/national-wetlands-inventory>

National Wild and Scenic Rivers System: <https://www.rivers.gov/>

US Census Bureau: https://data.census.gov/profile/Orange_County_Florida?g=050XX00US12095

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

Public Outreach [24 CFR 50.23 & 58.43]:

Agency and Tribal Consultation Letters sent February 19 and 24, 2025.

Early and Final Notice and Public Review of a Proposed Activity in a the FFRMS Floodplain or Wetland, posted on February and March 24, 2025, respectively.

Orange County will prepare a Combined Notice of Finding of No Significant Impact (FONSI) and Notice of Intent to Request a Release of Fund (RROF) notice using the current HUD-recommended format to present a finding of no significant impact to the public. The combined notice clearly indicates an intention to meet two separate procedural requirements and advises the public to specify which part of the Notice they are addressing. The Notice will be posted on the County's website for review and comments for 15 days in compliance with the public comment period for combined notices under CFR 24 Part 58.45.

Cumulative Impact Analysis [24 CFR 58.32]:

Based on the completion of this environmental assessment, the review of the proposed project indicates that there would be no significant changes to existing environmental conditions across the impact categories established by HUD in response to NEPA. The proposed program activities, rehabilitation, reconstruction, replacement, elevation, and demolition of homes on existing residential lots, are expected to have minor beneficial impacts or no impacts on 16 of the Environmental Assessment Factors reviewed. The only factor that may experience a minor adverse effect is Solid Waste Disposal/Recycling, due to the short-term increase in construction and demolition waste. However, all solid waste would be responsibly managed, disposed of, or recycled in accordance with applicable regulations. Overall, the proposed project activities would result in beneficial impacts on the housing stock in Orange County and would be consistent with local comprehensive plans and zoning requirements.

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

Alternative 1 and Selected Action: Perform Homeowner Rehabilitation, Reconstruction, Replacement, Elevation, and Demolition Project Activities in the FFRMS Floodplain and Wetland

After careful consideration, Orange County has determined that the only practicable action is to perform homeowner rehabilitation, reconstruction, replacement, and elevation project activities in the FFRMS floodplain and wetland. No project work will be conducted in the floodway, except for the removal of buildings and improvements from the floodway.

This proposed action was selected as the preferred alternative because it allows the maximum number of homes to be assisted, better supporting the goals of the Orange County Housing Rehabilitation Program and the Community Development Block Grant – Disaster Recovery (CDBG-DR) Program for Hurricanes Ian and Milton. The Orange County Housing Rehabilitation Program would provide funding to assist homeowners with necessary repairs and rehabilitation to improve health, safety, and well-being, while contributing to the structural integrity and preservation of owner-occupied homes. The CDBG-DR Program for Hurricanes Ian and Milton is intended to address unmet housing needs for homeowners whose homes were damaged or destroyed by the storms.

Under this alternative, homes located in an FFRMS floodplain or wetland would be rehabilitated, reconstructed, and replaced on the same residential property, generally within the same footprint as the existing structure. If replacing a manufactured housing unit (MHU) at the original location is not feasible, the MHU will be relocated to an alternative site outside the FFRMS floodplain and wetland.

This alternative best meets the program requirements by providing safe housing while allowing residents to remain in their existing communities.

Alternative 2: All homes selected for the Program must be outside the FFRMS floodplain and wetland

This alternative would require the homeowner's structure to be located outside of the FFRMS floodplain and wetland. Therefore, homes located in the FFRMS floodplain or wetland would not be eligible for funding for Rehabilitation, Reconstruction, Replacement, and Elevation under the Programs. This alternative would not fully meet program goals because it would exclude a significant number of homeowners whose properties are located in flood-prone areas. As a result, many of the most vulnerable homeowners would remain without assistance, undermining the program's objective of providing safe and resilient housing for those affected by Hurricanes Ian and Milton. Additionally, this approach would limit the overall impact of the programs by reducing the number of eligible homes and leaving some communities more exposed to future flood risks.

Alternative 3: Relocate All Homes Located Within the FFRMS Floodplain and Wetland

Under this alternative, all homes located within the FFRMS floodplain and wetland would be required to be relocated to a site outside of the floodplain and wetland. This alternative would provide program

support only to properties located outside of the FFRMS floodplain and wetland, thereby requiring homeowners to relocate. Existing homes within the floodplain and wetland would be demolished, and the vacant land would be restored to its natural state.

While this alternative would be the most protective for homeowners by relocating them to safer areas outside the floodplain and wetland, it was not selected because it would prevent homeowners from remaining in their existing communities, schools, and places of worship. It would also fail to meet the program's objective of rebuilding and revitalizing communities and homes affected by Hurricanes Ian and Milton or preservation of owner-occupied homes.

Although returning the floodplain and wetland to its natural state would reduce future flood risk and enhance environmental resilience, these benefits come at a significant cost. The expenses associated with relocation—including demolition and debris removal, the purchase price of the existing home, potential buyout incentives, and administrative costs—would likely exceed the cost of elevating the home and implementing mitigation measures.

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

This alternative would provide no assistance to homeowners for rehabilitation, reconstruction, replacement, or elevation under the Orange County Housing Rehabilitation Program or the CDBG-DR Program for Hurricanes Ian and Milton. As a result, homeowners in Orange County would not receive support to address unmet needs from Hurricanes Ian and Milton or to make necessary repairs and improvements to enhance their health, safety, and well-being. Additionally, this alternative would fail to improve the structural integrity and preservation of owner-occupied homes within Orange County. Since it would not address housing recovery needs or contribute to community rebuilding, this alternative was not selected.

Summary of Findings and Conclusions:

Based upon completion of this environmental assessment, environmental review of the proposed project indicates there will be no significant changes to existing environmental conditions across the impact categories implemented by HUD in response to the National Environmental Policy Act of 1969. The following subject areas require additional site-specific analysis before it can be concluded that a specific proposed project activity would have no significant environmental impacts on an individual site. These authorities are referenced under HUD's regulations at 24 CFR 58.5:

- Airport Hazards
- Flood Insurance
- Contamination and Toxic Substances
- Endangered Species
- Floodplain Management
- Historic Preservation
- Noise Abatement and Control
- Wetland Protection
- Wild and Scenic Rivers

A Tier II Site-Specific review must be completed prior to any project activities occurring on a particular site.

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

The following mitigation measures are required as conditions for approval of the project, as applicable. Please refer to site-specific checklist for site-specific mitigation measures.

General

- Acquire all required federal, state, and local permits prior to commencement of construction and comply with all permit conditions.
- If the scope of work of a proposed activity changes significantly, the application for funding must be revised and resubmitted for re-evaluation as required by 24 CFR 58.47.

Flood Insurance

- For structures located in a Special Flood Hazard Area on the effective FEMA Flood Insurance Rate Map (FIRM), and the community is participating in the National Flood Insurance Program and in good standing, the homeowner would be required to obtain and maintain flood insurance. Flood insurance must be maintained in perpetuity for the life of the structure, regardless of transfer of ownership.

Hazardous Materials

- All activities must comply with applicable federal, Florida, and local laws and regulations regarding environmental protection and asbestos, including but not limited to the following:
 - National Emission Standard for Asbestos, standard for demolition and renovation, 40 CFR 61.145 and 15
 - Florida Administrative Code and Florida Administrative Register: Rule Chapter 62-257: Asbestos Program.
- All activities must comply with applicable federal, Florida, and local laws and regulations regarding lead-based paint including, but not limited to the following:
 - EPA's Repair, Renovation, and Painting (RRP) Rule (40 CFR 745.80(e))
 - HUD's lead-based paint regulations in 24 CFR Part 35
 - HUD's "Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing"

Endangered Species

- If nests are present or any birds are using the structure for roosting purposes, the contractor should immediately notify Orange County to coordinate next steps. An environmental specialist with the Program will coordinate with the USFWS as necessary.
- If active or alternate Eagles nests are found within 660 feet of a site-specific project area, no project activities should occur during the nesting season, October 1 through May 15. If that limitation is not possible, consultation with the Florida Fish and Wildlife Conservation Commission (FWC) would be required and the contractor shall immediately notify Orange County to coordinate next steps.

Floodplain Management

- All structures, defined at 44 CFR 59.1, designed principally for residential use, located in the 1-percent-annual-chance (100-year) floodplain or the 0.2-percent-annual-chance (500-year) floodplain, that receive assistance for reconstruction, repair of substantial damage, or substantial improvement, must be elevated with the lowest floor, including the basement, at least two (2) feet above the most applicable Base Flood Elevation.

Historic Preservation

- All activities must comply with Section 106 of the National Historic Preservation Act per the implementing regulations at 36 CFR Part 800.
- If archeological deposits, including any stone tools, bones, 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 finds. All archeological findings will be secured and access to the sensitive area restricted. The contractor will inform the Certifying Officer immediately and Orange County will consult with SHPO. Work in sensitive areas cannot resume until consultation is completed and appropriate measures have been taken to ensure that the project complies with the National Historic Preservation Act.

Noise

- Comply with all applicable local noise ordinances.

Wetlands Protection and Water Quality

- Implement and maintain erosion and sedimentation control measures to prevent deposition of sediment and eroded soil in onsite and offsite wetlands.
- Minimize soil compaction by minimizing project activities, to the extent feasible, in vegetated areas, including lawns.

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: Krista Perry Date: 4/08/2025

Name/Title/Organization: Krista Perry, Environmental Manager, HORNE

Certifying Officer Signature: Byron Brooks Date: 17 Apr 25

Name/Title: Byron Brooks / County Administrator

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).