

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

**Project Information**

**Project Name:** Pinellas Recovers: People First Housing Recovery CDBG-DR Programs Tier 1 (Broad) Review

**Responsible Entity (RE):** Pinellas County

**State/Local Identifier:** B-25-UU-12-0007

**Preparer:** Brice Bloomer; CFM, Manager,  
Austin McLemore; Assistant Manager  
Cynthia Zbranak; CFM, VP of Environmental Services,

**Certifying Officer:** Erica Henry, MPA  
Disaster Recovery Program Manager, Pinellas County

**Consultant (if applicable):** GrantWorks, Inc.

**Direct Comments to:** Erica Henry, MPA  
Disaster Recovery Program Manager  
Pinellas County Government  
Pinellas Recovers  
400 S. Ft. Harrison Ave., Suite 349  
Clearwater, FL 33756  
[recover@pinellas.gov](mailto:recover@pinellas.gov)

**Project Location:** Pinellas County, Florida

**Additional Location Information:**

The Pinellas Recovers: People First Housing Recovery CDBG-DR Program will only address project locations within Pinellas County including all municipalities, except for the City of St. Petersburg, which has received its own disaster allocation. The exact locations of the projects will become known through the application process. See *Attachment A* for **Project Location Map (county-wide, with the exception of the City of St Petersburg as they have their own disaster allocation).**

**Approximate size of the project area:**

The county is approximately 608 square miles, of which 274 square miles is land.

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

During 2023 and 2024, Pinellas County endured the severe impacts of three significant weather events: Hurricanes Idalia, 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, Pinellas 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. These funds will be administered through Pinellas County's County Administration office to ensure effective and equitable recovery efforts.

Pinellas County's **“People First Housing Recovery Program”** is structured around a comprehensive set of programs designed to address disaster-related damage, prevent long-term displacement, and increase the availability of safe, code-compliant, and affordable housing. This suite of programs was developed in direct response to the unmet needs identified through Pinellas County's damage assessments and public engagement process and are tailored to meet the needs of both homeowners and renters across the most impacted areas.

The Pinellas Recovers: People First Housing Recovery Programs will provide home rehabilitation or reconstruction, demolition and new construction outside of the floodplain under specific circumstances and when necessary, relocation assistance, reimbursement of expenses for homeowner repairs and homebuyer assistance as well as other financial mechanisms in support of obtaining affordable housing.

See Program Breakdown in the chart below:

| Housing Recovery Initiative Programs   | Eligible Activities   | CDBG-DR Allocation   |
|--|---|----------------------|
| Homeowner Rehabilitation & Reconstruction Program (HRRP)                             | Acquisition, Demolition, Disposition, Relocation Payments for displaced persons, Optional Relocation Assistance (unable to rebuild in place), Rehabilitation, Reconstruction, Replacement (MHU), New Construction | \$490,000,000        |
| Strategic Relocation & Revitalization Program  | Relocating outside SFHA but only if applicant owns another property   | \$10,000,000         |
| Homeowner Reimbursement Program (HRP)  | Reimbursement for repair, reconstruction for owner-occupied homes defined under eligible structures below   | \$20,787,758         |
| Small Rental Rehabilitation/Reconstruction Program<br>(Local Landlord Program - LLP) | Rehabilitation, Reconstruction and New Construction for eligible units as defined below   | \$57,865,307         |
| Homebuyer Assistance Program   | Subsidized interest rates and mortgage principle, down payment and closing costs, acting as guarantee for mortgage financing  | \$20,000,000         |
| <b>Housing Programs Total</b>  |   | <b>\$598,653,065</b> |

## **Eligible Structures for these housing programs include:**

- Stick-built homes,
- Concrete block/Concrete masonry units (CMU) homes,
- Modular, Mobile, or Manufactured homes (MHUs),
- Other single-family residence types, including townhomes, duplex, triplex, quadplex, and condominiums (1-4 units).
- \* Refer to each Program's Guidelines for ineligible housing types and situations.

## **Project Maximums:**

- New Construction - \$375,000 including demolition of existing home on former lot.
- Reconstruction - \$375,000 including associated elevation or other required mitigation.
- Rehabilitation - \$150,000 including associated elevation or other required mitigation.
- Reimbursement - \$50,000
- Homebuyer Assistance - \$80,000

## **Program Details:**

- **Rehabilitation:** Rehabilitation repair work includes items required to complete repair or renovation of a portion of a home. Repair work is intended to repair storm damage and bring the items repaired into compliance with local building codes. Repair of substantially damaged or substantially improved structures will include scope associated with minimum property standards.
- **Reconstruction:** Reconstruction consists of the demolition, removal, and disposal of the storm damaged structure, followed by construction of a new home in substantially the same footprint as the storm-damaged home. Reconstruction work will be conducted in accordance with local building codes. Reconstructed homes are only offered in standard HRRP floorplans. No custom designed homes are authorized.
  - **Modular, Mobile, or Manufactured home unit (MHU)** properties qualify for a replacement award type when the estimated cost to repair is greater than \$15,000 and/or the MHU age is five (5) years or older. Eligible applicants with MHUs on leased land must have landowner consent to replace an MHU on the land prior to award or must have identified a suitable alternate location. Homes that meet the threshold for a replacement award will be demolished, and a new MHU will be installed in substantially the same footprint, when feasible. HRRP will provide applicants who qualify for replacement awards with 2-, 3-, and 4-bedroom single-wide or double-wide MHUs; all bedroom configurations include 2 bathrooms. Which unit configuration an applicant receives is based on the number of bedrooms present in the storm-impacted property and the width (single or doublewide) of the storm damaged MHU, as verified by the damage assessment.
  - MHUs qualify for a stick-built reconstruction if the estimated cost to repair the unit is greater than or equal to \$15,000 or the unit is greater than or equal to five (5) years old AND the home requires elevation greater than 5 feet, and the applicant owns the land on which the MHU sits.
  - Replacement of an MHU in an alternate location is only available when replacing the MHU in the same location as the storm-damaged MHU is prohibited or not feasible.
  - HRRP does not provide replacement property for applicants.

**Homeowner Rehabilitation & Reconstruction Program (HRRP)** provides assistance for eligible owner-occupied housing units damaged by Hurricanes Idalia, Helene, and/or Milton in 2023 and 2024 through repair/rehabilitation, reconstruction, elevation and, where necessary, relocation support to ensure households can return to safe and habitable homes.

**The Local Landlord Program (LLP)** provides housing assistance to eligible single-family rental properties (Landlord-Applicants) applicants affected by Hurricanes Idalia, Helene, and/or Milton in 2023 and 2024. LLP

assists property owners by providing funding to repair, reconstruct, or replace single family homes that suffered hurricane damage.

LLP funds will not be distributed to landlords directly. Funding to repair, replace, or reconstruct storm impacted properties will be distributed to program-selected general contractors and used to pay for the cost of construction activities.

**The Homeowner Reimbursement Program (RMB)** provides housing assistance to eligible single-family owner/occupant applicants (Owner-Applicants) affected by Hurricanes Idalia, Helene, and/or Milton in 2023 and 2024. RMB assists property owners by providing reimbursement for applicant funds used to repair, reconstruct, or replace storm-damaged eligible structures.

**The Homebuyer Assistance Program (HBA)** provides housing assistance to eligible low- to middle-income renters, at or below 120% of the area median income, within unincorporated Pinellas County, transitioning to homeownership following Hurricanes Idalia, Helene, and/or Milton in 2023 and 2024. HBA assists applicants in purchasing a new home in Pinellas County. Through the provision of financial incentives, the program facilitates home purchase assistance — into safer, more resilient housing areas outside of special flood hazard areas (SFHAs).

\*HBA environmental reviews per 24 CFR 58.35(b)(5) fit into specific criteria:

- “Activities to assist homebuyers to purchase **existing dwelling units or dwelling units under construction**, including closing costs and down payment assistance, interest buydowns, and similar activities that result in the transfer of title.”

As such the strategy for environmentally clearing HBA projects for this program is as follows:

- **CENST:** Existing home with no rehabilitation or repair associated with purchase or new home already under construction, (usually foundation in place), CENST per home.
- **EA:** New Home to be constructed, or existing home with rehabilitation/Repair work to be done. Anything that would fall under this description (only if an exception is made for the required criteria in the HBA Guidelines) will be reviewed under this Broad Review and at the associated Site-Specific level of review once identified.

The majority of the HBA assistance will be dealt with at the CENST level of review it is only being included in this broad review in the circumstance that an exception has been granted to the guidelines as noted above, those reviews will fall under this tiered review.

As outlined by the HBA Guidelines, Eligible property activities may include:

- Subsidized interest rates and mortgage principal amounts
- Reasonable closing costs, normally associated with the purchase of a home
- Providing up to 100 percent of any lender required down payment
- Acquiring guarantees for mortgage financing obtained

To be eligible for HBA assistance, the property must be an eligible structure type. Eligible structure types for purchase include:

- Single-family stick-built/Concrete block homes;
- Modular or Manufactured Homes, outside of a Special Flood Hazard Area (SFHA);
- Condominiums, Duplexes, Triplexes, Quadplexes

Additional structure requirements include:

- Occupancy- Ready, meaning not having any remaining storm or other damage at the time of closing.

## **Tiering Strategy:**

Pinellas County will utilize a tiered approach [24 CFR 58.15 (Tiering)] to evaluate the potential impacts of People First Housing Recovery CDBG-DR 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 two (2) Site-Specific checklists:**

**1. Rehabilitation/Reconstruction (includes elevation) and Reimbursement serving the following programs under this review:**

- Homeowner Rehabilitation & Reconstruction Program (HRRP)
- The Local Landlord Program (LLP)
- The Homeowner Reimbursement Program (RMB)
- The Homebuyer Assistance Program (HBA) for a Home to be Rehabilitated

**2. New Construction (includes elevation if appropriate)**

- Homeowner Rehabilitation & Reconstruction Program (HRRP)
- The Local Landlord Program (LLP)
- The Homeowner Reimbursement Program (RMB)
- The Strategic Relocation and Revitalization Program (SRRP)
- The Homebuyer Assistance Program (HBA) for a Home a home to be constructed

## **1. Rehabilitation/Reconstruction/Reimbursement/Financial Assistance**

**The following elements have been environmentally cleared at the Tier 1 (Broad Review) Level:**

- Airport Hazards
- Coastal Barrier Resources
- Clean Air
- Coastal Zone Management
- Explosive and Flammable Hazards
- Farmlands Protection
- Noise Abatement and Control
- Sole Source Aquifers
- Wild and Scenic Rivers

**The following elements will be reviewed at the Tier 2 (Site-Specific) Level:**

- Flood Insurance
- Contamination and Toxic Substances
- Endangered Species
- Floodplain Management
- Historic Preservation
- Wetlands Protection

## **2. New Construction**

**The following elements have been environmentally cleared at the Tier 1 (Broad Review) Level:**

- Airport Hazards
- Coastal Barrier Resources
- Flood Insurance
- Clean Air
- Coastal Zone Management
- Farmlands Protection
- Floodplain Management
- Sole Source Aquifers
- Wild and Scenic Rivers

**The following elements will be reviewed at the Tier 2 (Site-Specific) Level:**

- Contamination and Toxic Substances
- Endangered Species
- Flood Insurance

- Explosive and Flammable Hazards
- Historic Preservation
- Floodplain Management (verification)
- Noise Abatement and Control
- Wetlands Protection

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

The purpose of the proposed project is to assist in the recovery of Pinellas County after the destruction caused by Hurricanes Idalia, Helene, and Milton in 2023 and 2024. One of the primary purposes of the program is to promote long-term community stability and resilience and not only preserve affordable housing but create more affordable housing and opportunities for home ownership. Post Hurricane studies revealed that Pinellas County already had a shortage of affordable housing prior to the storm events and that the storm exacerbated that further.

The Pinellas County People First suite of programs is intended to assist single family homeowners and has extended the definition of this to include condominium units (1-4 units), duplexes/triplexes/quadplexes and mobile/modular homes as well. Additionally, funding is being extended to small rental units for repair/rehab/reconstruction and elevation to ensure affordable rental units are available. Lastly the People First programs will provide mechanism to assist renters to move into home ownership. These programs will repair and preserve, elevate and relocate units outside of flood hazard areas and create a more resilient and affordable community

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

Hurricanes Idalia (DR-4734-FL), Helene (DR-4828-FL), and Milton (DR-4834-FL), caused widespread devastation in Pinellas County, primarily impacting residential areas with severe flooding, structural damage to homes, and significant infrastructure disruption, leaving a lasting impact on the community with the most pressing unmet needs. Pinellas is currently focused on long-term housing repairs, critical infrastructure restoration, and economic recovery for small businesses, particularly in the hardest-hit neighborhoods around the Pinellas coastline. With an estimated \$5.2 billion in damages overall, Pinellas County sustained damage, including roof breaches, flood intrusion, compromised walls, rendering many uninhabitable due to storm surge, heavy rainfall, and hurricane force winds and completely destroying others.

Some property owners are repairing/reconstructing their homes as funds become available, while others have no available funds to complete needed repairs. Many homeowners and small rental owners 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 health and safety issues in the communities in which the properties are located.

**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 1,600 to 2,000 homeowners could be assisted.

**Funding Information**

| Grant Number    | HUD Program | Funding Amount |
|-----------------|-------------|----------------|
| B-25-UU-12-0007 | CDBG-DR     | \$598,653,065  |

**Estimated Total HUD Funded Amount:** \$598,653,065

**Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]:** \$598,653,065

## 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.

| <b>Compliance Factors:</b><br>Statutes, Executive Orders, and<br>Regulations listed at 24 CFR §58.5<br>and §58.6 | <b>Was<br/>           Compliance<br/>           achieved at<br/>           the Tier 1<br/>           (Broad) level<br/>           of review?</b> | <b>Compliance Determinations</b><br><i>If Yes: Describe compliance determinations made at the broad level.</i><br><i>If No: Describe the policy, standard, or process to be followed in the site-specific review.</i> |
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### STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6

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| <b>Airport Hazards</b><br>24 CFR Part 51 Subpart D | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> | <p>According to the National Plan of Integrated Airport Systems (NPIAS), there are three (3) identified and mapped airports within Pinellas County; Clearwater Air Park (CLW), St. Pete-Clearwater International Airport (PIE), and Albert Whitted Airport (SPG). Further review of each of these airports revealed that Clearwater Air Park and Albert Whitted Airport are categorized as Reliever Airports, which does not meet the definition of a Commercial Service airport (see Appendix C for definition). However, St Pete-Clearwater International Airport is categorized as a small hub Primary Commercial Service airport.</p> <p>24 CFR Part 51 Subpart D defines Civil Airports as existing commercial service airports as designated in the NPIAS prepared by the Federal Aviation Administration in accordance with section 504 of the Airport and Airway Improvements Act of 1982.</p> <p>According to the St. Pete-Clearwater International Airport Master Plan (September 2020), the approach and departure runway protection zones (RPZs) for Runways 18 and 4 are entirely within the airport property boundary while the approach and departure RPZs for Runways 36 and 22 are partially outside the airport properties boundaries. The areas outside of the airport boundaries within the RPZs of Runway 36 consist of public roads and their associated rights-of-way (ROWS) as well as commercial and industrial businesses along Ulmerton Road, 40<sup>th</sup> Street N, Airway Circle, Drywall Drive, 38<sup>th</sup> Street N, and 131<sup>st</sup> Avenue N in Clearwater, Florida. The areas outside of the airport boundaries within the RPZs of Runway 22 consist of shoreline and open water of Old Tampa Bay. No properties within these areas are eligible for assistance.</p> <p>There are multiple residential neighborhoods located within 2,500 feet of St. Pete-Clearwater International Airport; southeast adjacent and west/northwest adjacent to the airport. However, these neighborhoods are not located within the RPZ/CZ and shall have no impact on RPZs/CZs.</p> |
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|  |  | <p>MacDill Air Force Base is located east of Pinellas County extending over 15,000 feet in distance across Old Tampa Bay separating the two areas.</p> <p>This element is in compliance with 24 CFR Part 51 Subpart D, and no homes will be serviced within the RPZ/CZ zones.</p> <p><b>No further action is required for Airport Hazards.</b></p> <p><u>Sources and Attachments:</u> Attachment B – Florida Department of Environmental Protection’s Map of Military Airfields and Bases, National Plan of Integrated Airport Systems’ list of NPIAS Airports and accompanying map, and the St. Pete-Clearwater International Airport Master Plan (September 2020)</p>  |
| <p><b>Coastal Barrier Resources</b><br/>Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]</p> | <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> | <p>According to the U.S. Fish and Wildlife Coastal Barrier Resource System (CBRS) Mapper, Google Earth, and the Pinellas County Property Appraiser maps, Pinellas County contains several CBRS and Otherwise Protected Areas (OPA).</p> <p>One (1) small neighborhood was identified to be within or partially within CBRS P24. The following properties are not eligible for assistance under this program as they are zoned for residential purposes, and they will be documented as ineligible at the qualification stage prior to environmental review:</p> <ul style="list-style-type: none"> <li>• 1967 Bayview Dr., Tierra Verde, FL 33715</li> <li>• Vacant residential lot on Bayview Dr. (legal description: Green Land Preserve Land Condo Replat Lot 9)</li> <li>• Vacant residential lot on Bayview Dr. (legal description: Green Land Preserve Land Condo Replat Lot 8 Less That Part Desc Beg Sw Lot Cor Of Sd Lot Th Cur Lt Rad 210ft Arc 35 Ft Cb N16d59'35"W 34.96ft Th N 71d32'20"E 235.6ft Th S14d32'25"E 15ft Th S66d 40'36"W 236.32ft To Pob)</li> <li>• 2007 Bayview Dr., Tierra Verde, FL 33715</li> <li>• 2010 Bayview Dr., Tierra Verde, FL 33715</li> <li>• 2006 Bayview Dr., Tierra Verde, FL 33715</li> <li>• Vacant residential lot on Bayview Dr. (legal description: Green Land Preserve Land Condo Replat Lot 2)</li> <li>• 2000 Bayview Dr., Tierra Verde, FL 33715</li> </ul> <p>A portion of the property located at 1198 Mandalay Pt., Clearwater, FL 33767 is located within CBRS P24A. This property is not eligible for assistance under this program.</p> <p>The FL-85P OPA consists of Sand Key County Park owned by Pinellas County, Clearwater Fire Station #44 at 950 Gulf Blvd., Clearwater, FL 33767, and the Clearwater Community Sailing Center at 1001 Gulf Blvd. #2702, Clearwater, FL 33767. FL-86P OPA contains Caledesi Island (Caledesi Island State Park) and Honeymoon Island State Park and FL-87P</p> |

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|  |  | <p>OPA contains Anclote Key State Park both are owned by the Florida Department of Environmental Protection Division of State Lands. There are no eligible structures or eligible program activities for these areas, and they will not receive funding.</p> <p>FL24P OPA contains Fort de Soto Park owned by Pinellas County as well as several small keys located in the Tampa Bay National Wildlife Refuge. here are no eligible structures or eligible program activities for these areas, and they will not receive funding.</p> <p>All other areas within a CBRS or OPA are dedicated to protected green space and designated as both parkland or the national seashore.</p> <p>The proposed programs will have no effect on a CBRS unit or OPA; therefore, this element is in compliance. All residential lots within a CBRS unit or OPA have been identified and will be added to the disqualification utilized during eligibility determinations.</p> <p><b>No further action is required for Coastal Barrier Resources.</b></p> <p><u>Sources and Attachments:</u> Attachment C – USFWS Coastal Barrier Resource System (Pinellas County), Aerial Map of Ineligible Neighborhood “The Preserve”, and Pinellas County Property Appraiser documents</p>   |
| <p><b>Flood Insurance</b></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 <input type="checkbox"/> No <input checked="" type="checkbox"/></p> | <p>Pinellas County and all its municipalities (<i>Belleair, Belleair Beach, Belleair Bluffs, Belleair Shore, Clearwater, Dunedin, Gulfport, Indian Rocks Beach, Indian Shores, Kenneth City, Largo, Madeira Beach, North Redington Beach, Oldsmar, Pinellas Park, Redington Beach, Redington Shores, Safety Harbor, Seminole, South Pasadena, St. Pete Beach, Tarpon Springs, and Treasure Island</i>), excluding the City of St. Petersburg, participate in the National Flood Insurance Program (NFIP).</p> <p>If during the Tier 2 (site-specific) 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 instance a home was determined to be within the SFHA, received prior disaster assistance, and did not maintain required flood insurance, they will not be eligible for assistance in the Pinellas Recovers: People First Housing Recovery CDBG-DR Programs. Per the Housing Guidelines, New Construction will only take place outside of SFHAs; therefore, this element is in compliance for New Construction projects.</p> <p><b>No further action is required for New Construction projects.</b></p> |

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|  |  | <p><b>Compliance Review for this element for Rehabilitation, Reconstruction, and Reimbursement will be completed at the Tier 2 (site-specific) review.</b></p> <p><u>Sources and Attachment:</u> Attachment D – County-wide Floodplain Map and FEMA Community Status Book Report</p> |
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#### **STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5**

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| <p><b>Clean Air</b><br/>Clean Air Act, as amended, particularly section 176(c) &amp; (d); 40 CFR Parts 6, 51, 93</p> | <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> | <p>According to the U.S. EPA Green Book on Nonattainment Areas for Criteria Pollutants, Pinellas County is in attainment for all six (6) National Ambient Air Quality Standards (NAAQS):</p> <ul style="list-style-type: none"> <li>• Ozone (2008 standard and 2015 standard)</li> <li>• Carbon monoxide</li> <li>• Lead</li> <li>• Nitrogen dioxide</li> <li>• Sulfur dioxide</li> <li>• Particulate matter (2.5 and 10-micron standards)</li> </ul> <p>The proposed projects under the Pinellas Recovers Programs will only serve current homeowners and will not increase density or capacity (vehicular traffic). 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 compared to the federal General Conformity Rule <i>de minimis</i> thresholds.</p> <p>The Florida Department of Environmental Protection (FDEP) – Southwest District was notified of the proposed program intent on November 22, 2025. No responses have been received as of the date of this document.</p> <p><b>Best Management Practices:</b><br/><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>This element is in compliance with the Clean Air Act, and there will be no effect anticipated on this resource.</p> <p><b>No further action is required for Clean Air.</b></p> <p><u>Sources and Attachments:</u> Attachment E – EPA Green Book and FDEP Consultation</p> |
| <p><b>Coastal Zone Management</b><br/>Coastal Zone Management Act, sections 307(c) &amp; (d)</p>                     | <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> | <p>According to the National Oceanic and Atmospheric Administration (NOAA) Office for Coastal Management (OCM) data, the entire state of Florida is included within the Coastal Zone.</p>  |

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|   |  | <p>In addition, per the Florida Coastal Management Program Guide, the counties in Florida are differentiated by “coastal” and “inland” Coastal Zones. Coastal counties are required to be submitted for “Federal Consistency” to the Florida State Clearinghouse to ensure consistency with all related laws, regulations, and executive orders.</p> <p>As required by Executive Order 12372, the Florida State Clearinghouse, Office of Intergovernmental Programs, was contacted on November 22, 2025, to provide an overview of the programs and ensure consistency with the Florida Coastal Management Plan.</p> <p>A response was received on November 25, 2025, stating “while it is covered by E.O. 12372, the Florida State Clearinghouse does not select your project for review. You may proceed with your project.”</p> <p>This element is in compliance with the Coastal Zone Management Act.</p> <p><b>No further action is required for Coastal Zone Management.</b></p> <p><u>Sources and Attachments:</u> Attachment F – Coastal Zone Management Maps and Florida Clearinghouse Correspondence</p>  |
| <p><b>Contamination and Toxic Substances</b><br/>24 CFR Part 50.3(i) &amp; 58.5(i)(2)</p> | <p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> | <p>The Environmental Protection Agency’s (EPA) NEPAssist EnviroMapper was used to preemptively identify potential hazardous and contaminated sites within Pinellas County.</p> <p>The Tier 2 (site-specific) review 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 inspection documentation with photographs utilizing HUD’s Field Site Visit checklist.</p> <p>The analysis 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 the 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> |

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|  |  | <p>To date, a scientific data review was done for Radon by the U.S. Department 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 4,314 pre-mitigation radon tests were reported by the State of Florida in Pinellas 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 1.4 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><b>This element is in compliance with Radon.</b></p> <p><b>Compliance Review for this element will be completed at the Tier 2 (site-specific) review for Rehabilitation, Reconstruction, Reimbursement, and New Construction.</b></p> <p><u>Sources and Attachments:</u> Attachments G – EPA NEPAssist EnviroMapper and the National Environmental Public Health Tracking Network (CDC)</p>   |
| <p><b>Endangered Species</b><br/>Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p> | <p>Yes <input type="checkbox"/> No <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 Pinellas County. Pinellas County consists of 21 listed threatened, endangered, or candidate species per IPaC, some of which have established final critical habitats; therefore, project activities may have the potential to affect these species as well as the critical habitats. The National Oceanic and Atmospheric Administration's (NOAA) office of the National Marine Fisheries Services (NMFS) is responsible for marine species. Together, these Services are responsible for their respective listed species that a project may pose affects to.</p> <p>The USFWS issued a guidance and clearance document <i>U.S. Fish and Wildlife Service Clearance to Proceed with Federally-Insured Loan and Grant Project Requests</i> on July 14, 2024. The Service determined that the descriptions of projects below will generally have “No Effect” on species protected under the Endangered Species Act and no consultation or coordination with the Service is necessary:</p> <ol style="list-style-type: none"> <li>1. Any federally-insured loan or grant requests for existing commercial, industrial, and residential structures, and various utility projects (including but not limited to, demolition, rehabilitation, renovations, and/or building of various utility and infrastructure projects such as water and wastewater treatment facilities, sewer or power line repair, telecommunications upgrades, etc.), if: <ol style="list-style-type: none"> <li>a. The proposed project can be completed without additional clearing of undeveloped areas beyond the original footprint of the</li> </ol> </li> </ol> |

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|  |  | <p>existing project in order to complete the action request;</p> <ul style="list-style-type: none"> <li>b. There are no federally endangered or threatened species using the existing structures or within the project area;</li> <li>c. The project is not within designated critical habitat for any federally listed species (by rule, designated critical habitat does not include already developed parcels); and</li> <li>d. Specific Service field office requirements and exclusions are met for the state within which the project is located.</li> </ul> <ol style="list-style-type: none"> <li>2. Any Federal loan transfer where the original lending or mortgage institutions for existing projects are no longer holding the loans and the properties are being transferred via federally-backed loans.</li> <li>3. Any federally-insured loan or grant for the purchase of new equipment or vehicles.</li> </ol> <p>The Florida Ecological Services Field Office is listed and signed on as a participating office for this guidance and clearance document and is applicable for every county and municipality in Florida, with the exception of those in Monroe County. All proposed activities under the Pinellas Recovers CDBG-DR Programs is considered to have a “No Effect” determination on listed species and/or their critical habitats.</p> <p>According to 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 within mapped wildlife refuges, fish hatcheries, wildlife management areas, or related significant fish and wildlife resources.</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"> <li>• If nests are present or any birds are using the structures regularly for roosting purposes, USFWS recommends coordination with the Service. In addition, if any of the above project descriptions (rehabilitation, demolition, or rebuilding) are proposed to occur within 660 feet of an active or alternate bald eagle nest during nesting season (October 1 through May 15), USFWS requests coordination with the Service.</li> </ul> |
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- 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 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.
- 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 ( $\geq 100$  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.

The Florida Fish and Wildlife Commission: Southwest Region and the NOAA: Southeast Region were contacted on November 22, 2025, to provide an overview of the programs. No responses have been received as of the date of this document.

**Compliance Review for this element will be completed at the Tier 2 (site-specific) review for Rehabilitation, Reconstruction, Reimbursement, and New Construction.**

**Sources and Attachments:** Attachments H – IPaC, *USFWS Clearance to Proceed with Federally-Insured Loan and Grant Project Requests* document, Pinellas County Critical Habitat Map, and Consultation Letters to the Florida Fish and Wildlife Commission Southwest Region and the NOAA: Southeast Region

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| <b>Explosive and Flammable Hazards</b><br>24 CFR Part 51 Subpart C  | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> | <p>The proposed <b>Rehabilitation, Reconstruction, and Reimbursement</b> projects will not increase residential densities as they are existing single-family homes (as defined in the Housing Guidelines), and the purpose of the grant funds is to preserve housing stock and ensure recovery for Pinellas County. This element is in compliance for Rehabilitation, Reconstruction, and Reimbursement projects only.</p> <p>Per 24 CFR Part 51C Section 201, “For purposes of this subpart the terms “rehabilitation” and “modernization” refer only to such 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, 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.</p> <p><b>No further action is required for Rehabilitation, Reconstruction, and Reimbursement projects.</b></p> <p>As <b>New Construction</b> 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><b>Compliance Review for this element for New Construction will be completed at the Tier 2 (site-specific) review.</b></p> <p><u>Source and Attachment:</u> Attachments I – HUD 24 CFR Part 51C Section 201 Regulation</p> |
| <b>Farmlands Protection</b><br>Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658 | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> | <p>The proposed programs will provide funding for <b>Rehabilitation, Reconstruction, Reimbursement, or New Construction</b> of existing single-family homes (as defined in the Housing Guidelines) in Pinellas 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, this element is in compliance for all proposed program activities with the Farmland Protection Policy Act and will not irreversibly convert farmland to non-agricultural use.</p> <p><b>No further action is required for Farmlands Protection.</b></p> <p><u>Source and Attachment:</u> Attachments J – Pinellas County TIGERweb Census Urban Use Map</p>  |
| <b>Floodplain Management</b><br>Executive Order 11988, particularly section 2(a); 24 CFR Part 55                              | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> | According to the FEMA Flood Map Service Center, there are approximately 85,173 acres of 100-year floodplain, 13,679 acres of 500-year floodplain, 20,358 acres of Coastal High  |

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|  | <p>Hazard Areas (V Zones), and 1,122 acres of Floodways within Pinellas County, excluding the City of St. Petersburg.</p> <p>Based on this information, Executive Order 11988, 24 CFR 55.20 applies, and Pinellas County has chosen to perform the 8-Step Decision Making Process at the Tier 1 (Broad) review to expedite disaster recovery due to the possibility of direct and indirect impacts associated with the construction, occupancy, and modification of a Federal Flood Risk Management Standard (FFRMS) floodplain.</p> <p>The early public notice describing the project was published on the Pinellas County Pinellas Recovers website (<a href="https://recover.pinellas.gov/documents/#public-notices">https://recover.pinellas.gov/documents/#public-notices</a>), which is accessible to individuals with disabilities and provides the meaningful access for individuals with Limited English Proficiency (LEP), on December 3, 2025, for a total of fifteen (15) days, in English and Spanish.</p> <p>Within this process, alternatives to the proposed project activities were examined and included: locating outside of the FFRMS floodplain, 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 Impact. The standard seven (7) day publication comment period of the final public notice will be extended to match the Combined Notice's Federal Objection period of fifteen (15) days after publication. All three (3) notices will be published together in English and Spanish, on the Pinellas County Pinellas Recovers website (<a href="https://recover.pinellas.gov/documents/#public-notices">https://recover.pinellas.gov/documents/#public-notices</a>) on December 23, 2025.</p> <p>Once homes are identified, each will be analyzed at the Tier 2 (site-specific) review to determine if it is within a FFRMS floodplain.</p> <p>Homes located in the FFRMS floodplain that receive assistance for reconstruction or repair of SI/SD 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 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 to be located outside the FFRMS floodplain, this element is in compliance for New Construction.</p> |
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|  |   | <p><b>No further action is required for New Construction projects; however, FFRMS floodplain status will be verified at the Tier 2 (site-specific) level of review.</b></p> <p>Pinellas County and all municipalities' (<i>Belleair, Belleair Beach, Belleair Bluffs, Belleair Shore, Clearwater, Dunedin, Gulfport, Indian Rocks Beach, Indian Shores, Kenneth City, Largo, Madeira Beach, North Redington Beach, Oldsmar, Pinellas Park, Redington Beach, Redington Shores, Safety Harbor, St. Pete Beach, Seminole, South Pasadena, Tarpon Springs, and Treasure Island</i>) floodplain administrators, excluding the City of St. Petersburg, were contacted on November 22, 2025, to provide an overview of the programs.</p> <p>On November 24, 2025, Gene Henry, Floodplain Administrator, of the City of Clearwater responded with questions regarding specific projects that had the potential of being located within the SFHA within their city limits. After following up with Mr. Henry, he provided the City of Clearwater's city codes that implement their participation in the NFIP and applicable website links, including Flood Damage Prevention Ordinance, Building and Building Regulations, Pinellas Gulf Beaches Construction Code, and the Florida Building Code for homes that will be located within their city limits.</p> <p>On November 25, 2025, Wesley Wright, Community Development Director, of the City of Seminole, responded that the city has reviewed the letter and they have "no objections" to the implementation of these programs.</p> <p>No other responses have been received as of the date of this document.</p> <p><b>Compliance Review for this element will be completed at the Tier 2 (site-specific) review for Rehabilitation, Reconstruction, and Reimbursement only.</b></p> <p><b>Sources and Attachments:</b> Attachments K – Pinellas County Floodplain Map, 8-Step Decision Making Documentation and Early Notice, Consultation letters for Pinellas County, Belleair, Belleair Beach, Belleair Bluffs, Belleair Shore, Clearwater, Dunedin, Gulfport, Indian Rocks Beach, Indian Shores, Kenneth City, Largo, Madeira Beach, North Redington Beach, Oldsmar, Pinellas Park, Redington Beach, Redington Shores, Safety Harbor, St. Pete Beach, Seminole, South Pasadena, Tarpon Springs, and Treasure Island, Responses from Gene Henry (Clearwater) and Wesley Wright (Seminole)</p> |
| <b>Historic Preservation</b><br>National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800 | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> | Once selected, project locations will be mapped for the Tier 2 (site-specific) review to determine proximity to listed or eligible structures, neighborhoods, and districts.   |

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|  | <p>Each subject property will be evaluated to determine the year-built date of structures to be rehabilitated or reconstructed. Structures over 50 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 Office (SHPO) will be necessary to determine historic status, impacts, and plausible effects as a result of the proposed undertaking.</p> <p>The Florida SHPO was contacted on November 22, 2025, to provide an overview of the programs. On November 24, 2025, the Florida SHPO responded to our request stating that their “office asks to review structures 45 years of age and older, structures in or adjacent to historic districts, those listed or eligible in the National Register of Historic Places, and projects in or adjacent to archaeological sites and cemeteries.” In addition, Florida SHPO would like Pinellas County to follow 36 CFR Part 800 and to provide documentation for each project submitted to their office. Attached to their email response was their “Minimum Review Documentation Requirements” document for future submissions. Section 106 clearance will be achieved at the Tier 2 (site-specific) review.</p> <p>In addition to the Florida SHPO, Pinellas County and its municipalities’ Historic Commissions (HC) and Certified Local Governments (CLG) were contacted on November 22, 2025, to provide an overview of the programs. See below for a list of each consulted party:</p> <ul style="list-style-type: none"> <li>• HCs – <i>Pinellas County, Belleair, Clearwater, Dunedin, Gulfport, St. Pete Beach, and Tarpon Springs</i></li> <li>• CLGs – <i>Pinellas County, Belleair, Dunedin, Gulfport, Pinellas County, St. Pete Beach, and Tarpon Springs</i></li> </ul> <p>To date, no response has been received from the above-identified parties.</p> <p>Native American Tribes with potential cultural and traditional affiliations to Pinellas County identified from the Tribal Directory Assessment Tool (TDAT) were contacted on November 22, 2025, to provide an overview of the programs. These Tribes consist of the Miccosukee Tribe of Indians, Muscogee (Creek) Nation, and the Seminole Tribe of Florida. Although these Tribes were contacted at the Tier 1 (Broad) review, and no responses have been received to date of this review, we appreciate any correspondence and information they offer.</p> <p><b>No further action is required for Tribal Consultation. Any correspondence received after the date of this review will be considered and attached to the appropriate section of the full Environmental Review Record.</b></p> |
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|  |  | <p><b>Compliance Review for this element will be completed at the Tier 2 (site-specific) review for Rehabilitation, Reconstruction, Reimbursement, and New Construction.</b></p> <p><u>Sources and Attachments:</u> Attachments L – TDAT and Consultations with the Florida SHPO and the Miccosukee Tribe of Indians, Muscogee (Creek) Nation, and Seminole Tribe of Florida, Response letter from Florida SHPO</p>  |
| <p><b>Noise Abatement and Control</b><br/>Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p> | <p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> | <p>Per 24 CFR Part 51.101(a)(3), HUD Noise and 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. By this regulation, <b>Rehabilitation</b>, <b>Reconstruction</b>, and <b>Reimbursement</b> for the owner-occupied homes on substantially the same footprint does not apply. This element is in compliance for Rehabilitation, Reconstruction, and Reimbursement projects.</p> <p><b>No further action is required for Rehabilitation and Reconstruction projects.</b></p> <p><b>New Construction</b> of a relocated home or MHU is not exempt from this element and will be analyzed at the Tier 2 (site-specific) review.</p> <p><b>Compliance Review for this element for New Construction will be completed at the Tier 2 (site-specific) review.</b></p> <p><u>Source and Attachment:</u> Attachment M – HUD 24 CFR 51.101(a)(3) regulation</p> |
| <p><b>Sole Source Aquifers</b><br/>Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149</p>                  | <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> | <p>According to the U.S. EPA regional Sole Source Aquifers (SSA) mapper, there are no Sole Source Aquifers located in Pinellas County. The programs will have no effect on a Sole Source Aquifer, and this element is in compliance with 40 CFR Part 149.</p> <p><b>No further action is required for Sole Source Aquifers.</b></p> <p><u>Source and Attachment:</u> Attachments N – EPA Regional Sole Source Aquifer Map</p>  |
| <p><b>Wetlands Protection</b><br/>Executive Order 11990, particularly sections 2 and 5</p>   | <p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> | <p>According to the U.S. Fish and Wildlife Service National Wetlands Inventory (NWI), there are approximately 133,569 acres of mapped wetlands in Pinellas County, excluding the City of St. Petersburg. The wetlands identified include Palustrine Forested Wetlands, Freshwater Marshes and Wet Prairies, Estuarine Wetlands (including mangrove swamps), and tidal marshes along coastal zones.</p> <p>Based on this information, Executive Order 11990 applies, and Pinellas County has chosen to perform the 8-Step Decision Making Process at the Tier 1 (Broad) review to expedite disaster recovery due to the possibility of direct and indirect</p>  |

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|  |   | <p>impacts associated with the construction, occupancy, and modification of wetlands.</p> <p>The early public notice describing the project was published on the Pinellas County Pinellas Recovers website (<a href="https://recover.pinellas.gov/documents/#public-notices">https://recover.pinellas.gov/documents/#public-notices</a>), which is accessible to individuals with disabilities and provides the meaningful access for individuals with Limited English Proficiency (LEP), on December 3, 2025, for a total of fifteen (15) days, in English and Spanish.</p> <p>Within this process, alternatives to the proposed project activities were examined and included: locating outside of the 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 Impact. The standard seven (7) day publication comment period of the final public notice will be extended to match the Combined Notice's Federal Objection period of fifteen (15) days after publication. All three (3) notices will be published together in English and Spanish, on the Pinellas County Pinellas Recovers website (<a href="https://recover.pinellas.gov/documents/#public-notices">https://recover.pinellas.gov/documents/#public-notices</a>) on December 23, 2025.</p> <p>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 Housing Guidelines. The alternate location must be outside the FFRMS floodplain, cannot have a wetland present on the property, and contain all city services (water/sewer/electric/etc.).</p> <p>The selected alternative allows for reconstruction of home located adjacent to wetlands but specifies minimum construction best management practices (BMPs) for protection of water quality and wetland ecology. BMPs for soil erosion and stormwater management will be applied as appropriate for the protection of wetlands.</p> <p><b>Compliance Review for this element will be completed at the Tier 2 (site-specific) review for Rehabilitation, Reconstruction, Reimbursement, and New Construction.</b></p> <p><u>Sources and Attachments:</u> Attachments O – Pinellas County Wetland Map, 8-Step Decision Making Determination Documentation and Early Notice</p> |
| <b>Wild and Scenic Rivers</b><br>Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c) | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> | According to the Bureau of Land Management, U.S. Forest Service, National Park Service, and USFWS data, Pinellas County does not contain any Wild and Scenic Rivers (WSR). No portion of Pinellas County is located within proximity to a WSR, a Study River, or an Inventory River. The programs will   |

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|  |  | <p>have no effect on WSR, a Study River, or an Inventory River, and this element is in compliance with the Wild and Scenic Rivers Act of 1968.</p> <p><b>No further action is required for Wild and Scenic Rivers.</b></p> <p><u>Source and Attachment:</u> Attachments P – National Wild and Scenic Rivers System 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   |
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| <b>LAND DEVELOPMENT</b>  |             |   |
| 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. New construction or replacement of MHUs at new locations outside of the FFRMS floodplain would still be in previously established MHU zones. All single-family housing projects will be rehabilitated, reconstructed, or 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 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 and 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, 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>   |

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|   |   | Reimbursement recipients will have no impact on soil, erosion, drainage, or storm water runoff conditions.   |
| 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 and reconstruction.</p> <p>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   |
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| <b>SOCIOECONOMIC</b>                        |             |   |
| Employment and Income Patterns              | 1           | <p>Employment and income patterns in Pinellas 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.</p> <p>Reimbursement recipients will not impact employment and income patterns.</p> |
| Demographic Character Changes, Displacement | 2           | <p>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 2023 and 2024 hurricanes.</p> <p>Reimbursement recipients will not impact the demographic character changes or displacement.</p>  |

| Environmental Assessment Factor          | Impact Code | Impact Evaluation  |
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| <b>COMMUNITY FACILITIES AND SERVICES</b> |             |  |
| 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 Pinellas County. The proposed actions would allow previous residents to return to their homes and communities. There will be no additional |

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|  |   | <p>residences, only existing structures being repaired or reconstructed and new construction in infill lots in developed neighborhoods.</p> <p>Reimbursement activities will retain people in their homes and will not increase demand on educational or cultural facilities.</p>   |
| 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.</p> <p>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 | <p>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 2023 and 2024.</p> <p>Reimbursement recipients will not impact health care and social services significantly.</p> <p>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.</p>   |
| Solid Waste Disposal / Recycling                   | 2 | <p>The rehabilitation, demolition, and construction 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.</p>   |
| Waste Water / Sanitary Sewers                      | 2 | <p>Reimbursement recipients will not impact solid waste disposal and/or recycling.</p> <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 2023 and 2024.</p> <p>Homes are expected to utilize existing sewer services or existing/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.</p> <p>Reimbursement recipients will not impact the wastewater or sanitary sewer systems.</p> |
| Water Supply                                       | 2 | <p>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 2023 and 2024 hurricanes.</p> <p>Reimbursement recipients will not impact the existing water supply significantly.</p>   |
| Public Safety - Police, Fire and Emergency Medical | 2 | <p>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 2023 and 2024 hurricanes. It is expected that these resources would be able to provide services at pre-disaster levels, after a period of adjustment.</p>   |

|                                  |   |   |
|----------------------------------|---|---|
|                                  |   | 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.</p> <p>Reimbursement recipients will not impact recreational areas.</p>  |
| Transportation and Accessibility | 2 | <p>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.</p> |

| Environmental Assessment Factor          | Impact Code | Impact Evaluation   |
|--|-------------|---|
| <b>NATURAL FEATURES</b>                  |             |   |
| Unique Natural Features, Water Resources | 2           | <p>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.</p> <p>Reimbursement recipients will not have an impact on unique natural features or water resources.</p>  |
| Vegetation, Wildlife                     | 2           | <p>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 (site-specific) review onsite surveys.</p> <p>Reimbursement recipients will not have an impact on vegetation and/or wildlife.</p> |
| Other Factors                            |             | N/A   |

| Environmental Assessment Factor | Impact Code | Impact Evaluation  |
|---------------------------------|-------------|--|
| <b>ENERGY</b>                   |             |  |
| Energy Efficiency               | 1           | <p>Pinellas Recovers 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.</p> <p>For repairs, the County will align with the Pinellas 2025 Local Mitigation Strategy Plan to mitigate future hazards.</p> |

**Additional Studies Performed:** No additional studies are required for this project.

**Field Inspection** (Date and completed by):

Field Inspections will be completed at the Tier 2 (site-specific) review 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)]:

|   |  |   |
|---|--|---|
| Town of Belleair<br>Gay Lancaster<br>Town Manager<br>901 Ponce de Leon Boulevard<br>Belleair, FL 33756<br>Phone: (727) 588-3769 ext. 205<br><a href="mailto:g lancaster@townofbelleair.net">g lancaster@townofbelleair.net</a>  | City of Belleair Beach<br>Kyle Riefler<br>City Manager<br>444 Causeway Boulevard<br>Belleair Beach, FL 33786<br>(727) 229-8431<br><a href="mailto:kyle.riefler@cityofbelleairbeach.com">kyle.riefler@cityofbelleairbeach.com</a>   | State of Florida<br>Alissa Slade Lotane, Director<br>State Historic Preservation Office<br>Florida Division of Historical Resources<br>Division of Historical Resources & State<br>Historic Preservation Office<br>R.A. Gray Building<br>500 South Bronough Street<br>Tallahassee, FL 32399<br><a href="mailto:CompliancePermits@dos.myflorida.com">CompliancePermits@dos.myflorida.com</a> |
| City of Belleair Bluffs<br>Debra S. Sullivan, MMC<br>City Administrator<br>Use website link for email,<br><a href="https://www.belleairbluffs.org/email-contact/node/181/field_email/sidebar_photo">https://www.belleairbluffs.org/email-contact/node/181/field_email/sidebar_photo</a><br>(727) 584-2151 Ext 101<br><a href="mailto:dsullivan@belleairbluffs-fl.gov">dsullivan@belleairbluffs-fl.gov</a> | Town of Belleair Shore<br>Steve Blume<br>Mayor<br>Town of Belleair Bluffs Town Hall<br>2747 Sunset Blvd.<br>Belleair Bluffs, Fl. 33770<br>(727) 593-9296<br><a href="mailto:sblume@belleairshore.com">sblume@belleairshore.com</a> | Pinellas County Historic Commission<br>Monica Drake<br>Museum Operations Manager<br>(727) 582-2938<br><a href="mailto:mmdrake@pinellascounty.org">mmdrake@pinellascounty.org</a>  |
| City of Clearwater<br>Jennifer Poirrier<br>City Manager<br>City Manager's Office<br>City of Clearwater<br>P.O. Box 4748<br>Clearwater, FL 33758<br>(727) 562-4040   | City of Dunedin<br>Jennifer Bramley<br>City Manager<br>737 Louden Avenue<br>Dunedin, FL 34698<br>(727) 298-3007<br><a href="mailto:jennifer.bramley@dunedin.gov">jennifer.bramley@dunedin.gov</a>                                  | Belleair Local Historic Preservation Office (LHPO)<br>Robert Barris<br>(Ashley Bernal, Assistant to Town Manager)<br>Chairman<br>(727) 588-3769 x244<br><a href="mailto:abernal@townofbelleair.net">abernal@townofbelleair.net</a>  |
| City of Gulfport<br>James E. O'Reilly<br>City Manager<br>2401 53rd St. S<br>Gulfport, FL 33707<br>(727) 893-1009<br><a href="mailto:joreilly@mygulfport.us">joreilly@mygulfport.us</a>  | City of Indian Rocks Beach<br>Ryan Henderson<br>City Manager<br>1507 Bay Palm Blvd<br>Indian Rocks Beach, FL 33785<br>(727) 595-2517<br><a href="mailto:rhenderson@irbcity.com">rhenderson@irbcity.com</a>                         | City of Clearwater<br>Planning and Development Department<br>Historic Preservation<br>2741 State Road 580<br>Clearwater, FL 33761<br>(727) 562-4567   |
| Town of Indian Shores<br>Christina Porter<br>Town Administrator<br>19305 Gulf Boulevard<br>Indian Shores, FL 33785<br>(727) 595-4020<br><a href="mailto:Cporter@myindianshores.com">Cporter@myindianshores.com</a>  | Town of Kenneth City<br>Kristin Cook<br>Town Manager<br>6000 54th Avenue N.<br>Kenneth City, FL 33709<br>(727) 337-0835<br><a href="mailto:cookk@kennethcityfl.org">cookk@kennethcityfl.org</a>                                    | City of Dunedin<br>Frances Sharp<br>Planner II<br>Historic Preservation<br>737 Louden Avenue<br>Dunedin, FL 34698<br>(727) 298-3200<br><a href="mailto:Frances.sharp@Dunedin.gov">Frances.sharp@Dunedin.gov</a>   |
| City of Largo<br>John Curp<br>City Manager<br>201 Highland Ave N<br>Largo, FL 33770<br>(727) 586-7454<br><a href="mailto:CityManager@largo.com">CityManager@largo.com</a>   | City of Madeira Beach<br>Clint Belk (acting CM)<br>City Manager<br>300 Municipal Drive<br>Madeira Beach, FL 33708<br>(727) 580-8014<br><a href="mailto:cbelk@madeirabeachfl.gov">cbelk@madeirabeachfl.gov</a>                      | City of Gulfport<br>Historic Preservation Committee<br>David Mather<br>Chairperson<br>2401 53rd Street South<br>Gulfport, FL 33707<br>(727) 893-1000  |
| Town of North Redington Beach<br>Jay Super  | City of Oldsmar<br>Felicia Donnelly  | City of St. Pete Beach<br>Historic Preservation Board   |

|   |   |   |
|---|---|---|
| Mayor<br>17985 Gulf Blvd, Suite 201, Redington Shores, Fl. 33708(727) 391-4848<br><a href="mailto:mayor@townofnrb.com">mayor@townofnrb.com</a>  | City Manager<br>100 State Street W<br>Oldsmar, FL 34677<br>(813) 749-1102<br><a href="mailto:fdonnelly@oldsmarfl.gov">fdonnelly@oldsmarfl.gov</a>   | City Hall Commission Chambers<br>155 Corey Avenue<br>St. Pete Beach, FL 33706<br>(727) 367-2735   |
| City of Pinellas Park<br>Bart Diebold<br>City Manager<br>5141 78th Avenue N<br>Pinellas Park, FL 33781<br>(727) 369-0704<br><a href="mailto:bdiebold@pinellas-park.com">bdiebold@pinellas-park.com</a>                | Town of Redington Beach<br>David Will<br>Mayor<br>105 164th Avenue<br>Redington Beach, FL 33708<br>(727) 391-3875<br><a href="mailto:MAYOR@townofredingtonbeach.com">MAYOR@townofredingtonbeach.com</a>             | City of Tarpon Springs<br>Heritage Preservation Board<br>Planning and Zoning<br>324 E. Pine Street<br>Tarpon Springs, FL 34689<br>(727) 942-5611  |
| Town of Redington Shores<br>Margaret Carey<br>Town Manager<br>17425 Gulf Blvd.<br>Redington Shores, FL 33708<br>(727) 397-5538<br><a href="mailto:townadmin@redshoresfl.com">townadmin@redshoresfl.com</a>            | City of Safety Harbor<br>Josh Stefancic<br>City Manager<br>750 Main Street<br>Safety Harbor, FL 34695<br>(727) 724-1555<br><a href="mailto:jstefancic@cityofsafetyharbor.com">jstefancic@cityofsafetyharbor.com</a> | Town of Belleair<br>Certified Local Government<br>Ms. Ashley Bernal<br>901 Ponce de Leon Boulevard<br>Belleair, FL 33756<br>(727) 647-7487<br><a href="mailto:abernal@townofbelleair.net">abernal@townofbelleair.net</a>  |
| City of St. Pete Beach<br>Frances Robustelli<br>City Manager<br>155 Corey Avenue<br>St. Pete Beach, FL 33706<br>(727) 363-9232<br><a href="mailto:frobustelli@stpetebeach.org">frobustelli@stpetebeach.org</a>        | City of Seminole<br>Ann Toney-Deal<br>City Manager<br>9199 113th Street<br>Seminole, FL 33772<br>(727) 391-0204<br><a href="mailto:atoneydeal@myseminole.com">atoneydeal@myseminole.com</a>                         | City of Dunedin<br>Certified Local Government<br>Ms. Frances Sharp, AICP, Planner II<br>P.O. Box 1348<br>737 Louden Avenue<br>Dunedin, FL 34697<br>(727) 298-3200<br><a href="mailto:fsharp@DunedinFL.net">fsharp@DunedinFL.net</a>   |
| City of South Pasadena<br>Arthur Penny<br>Mayor<br>City Hall<br>7047 Sunset Drive South<br>South Pasadena, FL 33707<br>(727) 347-4171<br><a href="mailto:apenny@mypsouthpasadena.com">apenny@mypsouthpasadena.com</a> | City of Tarpon Springs<br>Charles Rudd<br>City Manager<br>City Hall<br>324 East Pine Street<br>Tarpon Springs, FL 34689<br>(727) 938-3711<br><a href="mailto:charlesrudd@ctsfl.us">charlesrudd@ctsfl.us</a>         | City of Gulfport<br>Certified Local Government<br>Ms. Shannon Farrell, Risk Management & HR Director<br>2401 53rd Street South<br>Gulfport, FL 33707<br>(727) 893-1021<br><a href="mailto:Sfarrell@mygulfport.us">Sfarrell@mygulfport.us</a>  |
| City of Treasure Island<br>John Doctor<br>Mayor<br>City Hall<br>10451 Gulf Blvd<br>Treasure Island, FL 33706<br>(727) 340-0114<br><a href="mailto:jdoctor@mytreasureisland.org">jdoctor@mytreasureisland.org</a>      | Pinellas County<br>Lisa Foster<br>Floodplain Coordinator<br>(727) 464-8962 x4876<br><a href="mailto:ldfoster@pinellascounty.org">ldfoster@pinellascounty.org</a>  | City of Clearwater<br>Certified Local Government<br>Mr. Thomas Scofield, Preservation Planner<br>310 Court Street<br>Clearwater, FL 33756<br>(727) 464-3585<br><a href="mailto:tscofield@pinellas.gov">tscofield@pinellas.gov</a>   |
| Town of Belleair<br>Bruce Cooper<br>Flood Plain Admin/Mgr<br>(727) 263-8366<br><a href="mailto:bcooper@safebuilt.com">bcooper@safebuilt.com</a>   | City of Belleair Beach<br>Kyle Riefler<br>Flood Plain Admin/Mgr<br>(727)-595-4646 x123<br><a href="mailto:Kyle.Riefler@CityofBelleairbeach.com">Kyle.Riefler@CityofBelleairbeach.com</a>                            | City of St. Pete Beach<br>Certified Local Government<br>Mr. Brandon Berry, Planner<br>155 Corey Avenue<br>St. Pete Beach, FL 33706-1839<br>(727) 363-9265<br><a href="mailto:lrosetti@stpetebeach.org">lrosetti@stpetebeach.org</a><br><a href="mailto:bberry@stpetebeach.org">bberry@stpetebeach.org</a> |
| City of Belleair Bluffs<br>Debra Sullivan<br>City Administrator<br>(727) 584-2151<br><a href="mailto:dsullivan@belleairbluffs-fl.gov">dsullivan@belleairbluffs-fl.gov</a>   | Town of Belleair Shore<br>Regina Kardash<br>Town Attorney/FPA<br>(941) 306-4730<br><a href="mailto:rkardash@swflgovlaw.com">rkardash@swflgovlaw.com</a>   | City of Tarpon Springs<br>Certified Local Government<br>Ms. Caroline Lanford, AICP CTP, Planner<br>P.O. Box 5004<br>Tarpon Springs, FL 34688<br>(727) 938-3711 x2255<br><a href="mailto:clanford@ctsfl.us">clanford@ctsfl.us</a>  |
| City of Clearwater  | City of Dunedin   | State of Florida Clearinghouse  |

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|---|---|---|
| Eugene Henry<br>Flood Plain Admin/Mgr<br>(727) 444-8872<br><a href="mailto:gene.henry@myclearwater.com">gene.henry@myclearwater.com</a>   | Joseph DiPasqua<br>Flood Plain Admin/Mgr<br>(727) 298-3193<br><a href="mailto:joseph.dispasqua@dunedin.gov">joseph.dispasqua@dunedin.gov</a>  | Coastal Zone Management<br>Chris Stahl, Clearinghouse Coordinator<br><a href="mailto:State.Clearinghouse@dep.state.fl.us">State.Clearinghouse@dep.state.fl.us</a>   |
| City of Gulfport<br>Mark Griffin<br>Flood Plain Admin/Mgr<br>(727) 893-1023<br><a href="mailto:mgriffin@mygulfport.us">mgriffin@mygulfport.us</a>   | City of Indian Rocks Beach<br>Dean Scharmen<br>Flood Plain Admin/Mgr<br>(727) 595-6889<br><a href="mailto:dscharmen@irbcity.com">dscharmen@irbcity.com</a>  | Miccosukee Tribe of Indians<br>Talbert Cypress, Chairman<br>CC: Jason Daniel, Historic Preservation Officer<br>P.O. Box 440021<br>Miami, FL 33144<br>(305) 223-8380<br><a href="mailto:marlap@miccosukeetribe.com">marlap@miccosukeetribe.com</a> ;<br><a href="mailto:Jasond@miccosukeetribe.com">Jasond@miccosukeetribe.com</a> |
| Town of Indian Shores<br>Brian Rusu, CBO & CFM<br>Flood Plain Admin/Mgr<br>727-474-7785<br><a href="mailto:brusu@myindianshores.com">brusu@myindianshores.com</a>   | Town of Kenneth City<br>Will Herbert<br>Flood Plain Admin/Mgr<br>(727) 498-8948<br><a href="mailto:wherebert@kennethcityfl.org">wherebert@kennethcityfl.org</a>   | Muscogee (Creek) Tribe<br>David Hill, Principal Chief<br>CC: Dr. Savannah Waters, THPO<br>PO Box 580<br>Okmulgee, OK 74447<br>(918) 732-7852<br><a href="mailto:swaters@muscogeenation.com">swaters@muscogeenation.com</a> ;<br><a href="mailto:section106@muscogeenation.com">section106@muscogeenation.com</a>                  |
| City of Largo<br>Robert Hatton<br>Building Official<br>(727) 586-7488 x7417<br><a href="mailto:rhatton@largo.com">rhatton@largo.com</a>   | City of Maderia Beach<br>Linda Portal, MPA, CFM<br>Planning and Zoning Director<br>(727) 391-9951 x255<br><a href="mailto:lportal@madeirabeachgl.gov">lportal@madeirabeachgl.gov</a>  | Seminole Tribe of Florida<br>Marcellus Osceola, Chairman<br>CC: Tina Marie Osceola, THPO<br>30290 Josie Billie Hwy PMB 1004<br>Clewiston, FL 33440<br>(239) 298-3279<br><a href="mailto:chairman@semtribe.com">chairman@semtribe.com</a> ;<br><a href="mailto:tinaosceola@semtribe.com">tinaosceola@semtribe.com</a>              |
| Town of North Redington Beach<br>Bruce Cooper<br>Building Official<br>(727) 202-6825<br><a href="mailto:bcooper@safebuilt.com">bcooper@safebuilt.com</a>  | City of Oldsmar<br>Marie Dauphinais<br>Planning and Redevelopment Director<br>(813) 749-1122<br><a href="mailto:mdauphinais@myoldsmar.com">mdauphinais@myoldsmar.com</a>  | City of Pinellas Park<br>Brian Ellis<br>Flood Plain Admin/Mgr<br>(727) 369-5842<br><a href="mailto:bellis@pinellas-park.com">bellis@pinellas-park.com</a>   |
| Town of North Redington Beach<br>Darin Cushing<br>Building Official<br>(727) 202-6825<br><a href="mailto:dcushing@safebuilt.com">dcushing@safebuilt.com</a>   | Town of Redington Shores<br>Bruce Cooper<br>Building Official<br>(727) 397-5538<br><a href="mailto:bldgdept@townofredingtonshores.com">bldgdept@townofredingtonshores.com</a>   | City of Safety Harbor<br>Troy Wilcox<br>Flood Plain Manager<br>(727) 240-7241<br><a href="mailto:TWilcox@cityofsafetyharbor.com">TWilcox@cityofsafetyharbor.com</a>   |
| City of St. Pete Beach<br>Luke Curtis<br>Flood Plain Admin/Manager<br>(727) 235-6893<br><a href="mailto:L.Curtis@stpetebeach.org">L.Curtis@stpetebeach.org</a>  | City of Seminole<br>Wesley Wright<br>Flood Plain Admin/Manager<br>(727) 398-3108 xt.129<br><a href="mailto:wwright@myseminole.com">wwright@myseminole.com</a>   | City of South Pasadena<br>Terri Sullivan<br>Flood Plain Admin/Manager<br>(727) 343-4192<br><a href="mailto:tsullivan@mysouthpasadena.com">tsullivan@mysouthpasadena.com</a>   |
| City of Tarpon Springs<br>Kevin Powell<br>Community Development Director<br>(727) 942-5604<br><a href="mailto:kpowell@ctsfl.us">kpowell@ctsfl.us</a>  | City of Treasure Island<br>Jesse Miller, CFM<br>Flood Plain Admin/Manager<br>(727) 547-4575 x239<br><a href="mailto:jmiller@mytreasureisland.org">jmiller@mytreasureisland.org</a>  | Florida Department of Environmental Protection<br>Southwest District<br>Kelley Boatwright, Director<br>13051 N Telecom Parkway, Suite 101<br>Temple Terrace , FL 33637-0926<br>(813) 470-5700   |
| Florida Fish and Wildlife Commission:<br>Southwest Region<br>Allie McCue<br>Regional Director<br>3900 Drane Field Road<br>Lakeland, FL 33811-1207<br>(863) 648-3200<br><a href="mailto:executivedirector@myfwc.com">executivedirector@myfwc.com</a> | National Marine Fisheries Services -<br>Southeast Regional Office<br>Noah Silverman<br>NEPA Coordinator<br>263 13th Avenue South<br>St. Petersburg FL 33701<br>(727) 824-5301<br><a href="mailto:noah.silverman@noaa.gov">noah.silverman@noaa.gov</a> | USFWS: Florida Ecological Services Field Office<br>777 37th St<br>Suite D-101<br>Vero Beach, FL 32960-3559<br><a href="mailto:fw4flesregs@fws.gov">fw4flesregs@fws.gov</a>  |

**List of Permits Obtained:** All necessary permits will be obtained at the Tier 2 (site-specific) review.

**Public Outreach** [24 CFR 50.23 & 58.43]:

On November 25, 2025, Robert Eschenfelder, Esquire, responded to the program notification letter on behalf of Redington Shores as their Town Attorney. Mr. Eschenfelder requested clarification on the programs of Pinellas County and how they would affect the Town. After responding to Mr. Eschenfelder and providing an overview of the intent of the letter, he provided a “no comment” response.

The county-wide 8-Step Decision-Making Process for floodplain and wetland actions was performed, which required the publication of two (2) separate postings on Pinellas County’s Pinellas Recovers website (<https://recover.pinellas.gov/>). 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 Pinellas County Pinellas Recovers website on December 23, 2025, for public review. These are presented in **Attachments K and O.**

<https://recover.pinellas.gov/documents/#public-notices>

**Cumulative Impact Analysis** [40 CFR 1508.7]:

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]:

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.

Alternative technology or materials: Replace all lost units with MHUs. 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 Pinellas Recovers 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 Pinellas Recovers 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 Pinellas 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 Use 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 two (2) Tier 2 (site-specific) review checklists: 1. Rehabilitation, Reconstruction, and Reimbursement, 2. New Construction. The following items were determined to need evaluation at the Tier 2 (site-specific) review by activity.

### **1. Rehabilitation/Reconstruction/Reimbursement/Financial Assistance**

#### **The following elements have been environmentally cleared at the Tier 1 (Broad) Review Level:**

|   |  |
|---|--|
| <ul style="list-style-type: none"><li>• Airport Hazards</li><li>• Coastal Barrier Resources</li><li>• Clean Air</li><li>• Coastal Zone Management</li><li>• Explosive and Flammable Hazards</li></ul> | <ul style="list-style-type: none"><li>• Farmlands Protection</li><li>• Noise Abatement and Control</li><li>• Sole Source Aquifers</li><li>• Wild and Scenic Rivers</li></ul> |
|---|--|

#### **The following elements will be reviewed at the Tier 2 (Site-Specific) Level:**

|   |   |
|---|---|
| <ul style="list-style-type: none"><li>• Flood Insurance</li><li>• Contamination and Toxic Substances</li><li>• Endangered Species</li></ul> | <ul style="list-style-type: none"><li>• Floodplain Management</li><li>• Historic Preservation</li><li>• Wetlands Protection</li></ul> |
|---|---|

### **2. New Construction**

#### **The following elements have been environmentally cleared at the Tier 1 (Broad) Review Level:**

|   |  |
|---|--|
| <ul style="list-style-type: none"><li>• Airport Hazards</li><li>• Coastal Barrier Resources</li><li>• Flood Insurance</li><li>• Clean Air</li><li>• Coastal Zone Management</li></ul> | <ul style="list-style-type: none"><li>• Farmlands Protection</li><li>• Floodplain Management</li><li>• Sole Source Aquifers</li><li>• Wild and Scenic Rivers</li></ul> |
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#### **The following elements will be reviewed at the Tier 2 (Site-Specific) Level:**

- Contamination and Toxic Substances
- Endangered Species
- Explosive and Flammable Hazards
- Floodplain Management (verification)

- Historic Preservation
- Noise Abatement and Control
- Wetlands Protection

## **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 Measures and Conditions  |
|--|---|
| <b>Clean Air</b><br>Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93 | <b>Best Management Practices:</b><br><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>   |
| <b>Endangered Species</b><br>Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402     | <b>Best Management Practices:</b><br><i>If nests are present or any birds are using the structures regularly for roosting purposes, USFWS recommends coordination with the Service. In addition, if any of the above project descriptions (rehabilitation, demolition, or rebuilding) are proposed to occur within 660 feet of an active or alternate bald eagle nest during nesting season (October 1 through May 15), USFWS requests coordination with the Service.</i><br><i>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 impacts to (and take of) migratory birds.</i><br><i>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.</i><br><i>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</i> |

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|  | <p><i>birds is found, a qualified biologist with USFWS should be notified. If nests are found, USFWS recommends leaving a buffer of vegetation (<math>\geq 100</math> 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.</i></p>  |
| <p><b>Historic Preservation</b><br/>National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p> | <p>Native American tribes with potential cultural and traditional affiliations to Pinellas 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 Pinellas 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> |

#### 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's Signature

12/23/2025

Date

Brice Bloomer, Environmental Manager

GrantWorks, Inc

Preparer's Name and Title

Preparer's Agency



Responsible Entity Certifying Official Signature

12/23/2025

Date

Erica Henry, Disaster Recovery Program Manager

Responsible Entity Certifying Official Name and Title

*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).*