**Modified 8 Step Template**

**Instructions to Lender:** This is a template that can be used to analyze the floodplain for the modified 8 step. **Please submit this in word format.** The red text is only an example used to show the type of information that can be included. Here is a link to [24 CFR Part 55](https://www.ecfr.gov/current/title-24/subtitle-A/part-55).

**Note on Projects in the 100-year Floodplain:** HUD Handbook 4232.1, Production, Chapter 7.5.C.9 states that for Section 223(f) projects HUD will evaluate risks and mitigation measures in making its decision, but it discourages these actions if either the lowest floor, or the life support facilities, or egress and ingress of the existing building, are below the 100-year floodplain line.

Lenders with projects in the 100-year floodplain should address the following:

* Elevation of the of the mechanical, electrical, generator, elevator mechanical equipment, residential units, medical storage, food preparation, food service, food storage, ingress/egress
* Ability of staff and emergency personnel to enter and exit the building during a flood to deliver necessary supplies, resident care and to evacuate residents.
* Information about any previous flooding at the project

Appropriate mitigation measures vary based on the specific project, so lenders should submit proposed mitigation measures to Lean Thinking ahead of application submission in the event that the project is an unacceptable flood risk and/or to avoid significant delays in application processing.

**Project Name: Insert project name**

**Project Number: Insert project number**

**Project Address: Insert project address**

The subject project is classified as a Critical Action per 24 CFR Part 55.2(b)(3)(i). Critical Actions are uses likely to contain occupants who may not be sufficiently mobile to avoid loss of life or injury during flood or storm events, e.g., persons who reside in hospitals, nursing homes, convalescent homes, intermediate care facilities, board and care facilities, and retirement service centers.

A Critical Action located in a Federal Flood Risk Management Standards (FFRMS) floodplain is subject to the Decision Making steps at 24 CFR §55.20. In accordance with §55.13, only five of the eight-steps described at §55.20 must be satisfied when the number of units is not increased more than 20 percent, the action does not involve a conversion from nonresidential to residential land use, the action does not meet the thresholds for “substantial improvement” under §55.2(b)(12), and the footprint of the structure and paved areas is not significantly increased. The subject project qualifies for this abbreviated process and Steps 2, 3 and 7 are not applicable.

***Step 1.*** *Determine whether the proposed action is located in the FFRMS floodplain*

According to the flood map and/or other supporting documentation, the subject project is located in the FFRMS floodplain.

***Step 2****. Notify the public at the earliest possible time of a proposal to consider an action in a FFRMS floodplain, and involve the affected and interested public in the decision making process.*  
(This step is not required for projects that qualify under 24 CFR 55.12(a) for the abbreviated 8-step process.)  
  
***Step 3.*** *Identify and evaluate practicable alternatives to locating the proposed action in a FFRMS floodplain*  
(This step is not required for projects that qualify under 24 CFR 55.12(a) for the abbreviated 8-step process.)  
  
***Step 4.*** *Identify the potential direct and indirect impacts associated with the occupancy or modification of the floodplain*

The project is considered a critical action due to the probable immobility nature of the residents. This puts current and prospective residents, staff, etc. at risk. The project’s implementation of the following safety measures under Step 5 will serve to reduce the risk to lives and property.

* Discuss the areas of the site that are subject to flood risk. Is the entire site in the FFRMS floodplain, or is a small portion of the site in the floodplain?
* In situations where there are dams, levees or other flood protection infrastructure located in proximity to the site, discuss this here.
* For projects in the 100-year floodplain, discuss elevation of the of the mechanical, electrical, generator, elevator mechanical equipment, residential units, medical storage, food preparation, food service, food storage, ingress/egress, ability of staff and emergency personnel to enter and exit the building during a flood to deliver necessary supplies, resident care and to evacuate residents.
* If the project is located near any hazardous waste facilities, discuss whether floods would create or worsen a risk of release of toxic substances.
* If the project will increase the amount of impervious surface on the project site, discuss any expected impact to surrounding properties.

***Step 5.*** *Where practicable, design or modify the proposed action to minimize the potential adverse impacts within the FFRMS floodplain and to restore and preserve its natural and beneficial values. All critical actions in the FFRMS floodplain must include:  
1. Preparation of and participation in an early warning system;  
2. An emergency evacuation and relocation plan;  
3. Identification of evacuation route(s) out of the 500-year floodplain*

*4. Resident notification: New and renewal leases must include acknowledgements signed by residents indicating that they have been advised that the property is in a floodplain and flood insurance is available for their personal property. Notification shall also include the location of ingress and egress routes relative to the FFRMS floodplain, available emergency notification resources, and the property's emergency procedures for residents in the event of flooding.*

The proposed action involves an existing residential care facility.

* Describe proposed construction and site work, and any modifications that will be made to minimize the potential adverse impacts within the floodplain and to restore and preserve its natural and beneficial values.
* Describe the level of repair work being completed as part of the refinance. If there are repairs being completed that involve landscaping or exterior infrastructure repairs, could additional floodplain drainage improvements be added to make the site safer in the event of a flood? For example, if the project repairs involve redoing the ingress to the project, could this be done in a way that improves access in the event of a flood?
* If flood mitigation is not practicable given the limited scope of repairs, describe why flood mitigation is not practicable. For example, the subject project is not completing repairs in excess of routine maintenance OR the subject project is not completing significant exterior repairs that could be modified to minimize the potential adverse impacts within the floodplain and to restore and preserve its natural and beneficial values.

The borrower has confirmed that the project will comply with Step 5, parts 1 through 4 as follows:

1. Preparation of and participation in an early warning system will be accomplished by implementing the emergency warning system policy described in the provided Flood Disaster Plan for the facility.
2. The owner’s emergency evacuation and relocation plans are provided.
3. Identification of evacuation route(s) out of the FFRMS floodplain are provided.
4. Resident notification: New and renewal leases must include acknowledgements signed by residents indicating that they have been advised that the property is in a floodplain and flood insurance is available for their personal property. Notification shall also include the location of ingress and egress routes relative to the FFRMS floodplain, available emergency notification resources, and the property's emergency procedures for residents in the event of flooding.

***HUD staff will complete Step 6***

***Step 6.*** *Reevaluate the proposed action to determine:  
(1) Whether it is still practicable in light of its exposure to flood hazards in the floodplain, the extent to which it will aggravate the current hazards to other floodplains, and its potential to disrupt floodplain values; and  
(2) Whether alternatives preliminarily rejected at Step 3 (paragraph (c)) of this section are practicable in light of the information gained in Steps 4 and 5 (paragraphs (d) and (e)) of this section.*

(Part 1) The project consists of an existing facility and the proposed action will not increase exposure to floodplain hazards, nor does it have any anticipated effect on a floodplain or on floodplain values. The owner will implement the actions listed at Step 5 to minimize the exposure to flood hazards.  
(Part 2 is not applicable for projects that qualify for the abbreviated 8-step process)

***Step 7.*** *If the reevaluation results in a determination that there is no practicable alternative to locating the proposal in the FFRMS floodplain, publish a final notice...*

(This step is not required for projects that qualify under 24 CFR 55.12(a) for the abbreviated 8-step process.)  
  
***Step 8.*** *Upon completion of the decision making process in Steps 1 through 7, implement the proposed action. There is a continuing responsibility to ensure that the mitigating measures identified in Step 7 are implemented.*