

DAUPHIN COUNTY

OFFICE OF COUNTY COMMISSIONERS

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April 6, 2015

Hon. Eric Papenfuse
Mayor, City of Harrisburg
MLK Government Center
10 N. Second St.
Harrisburg, PA 17101

RE: CDBG-DR Funding

Dear Mayor Papenfuse:

Your letter dated March 24, 2015 regarding Community Development Block Grant – Disaster Recovery funding is not only inaccurate but also perplexing. Dauphin County has been and will continue to work with Harrisburg City officials to help provide much-needed relief to the 1400 Block of South 14th Street, a neighborhood devastated by sinkholes and fissures. In fact, county officials have been actively assisting City leaders with securing funding for this critical and complex multi-million remediation project.

As you may know, the U.S. Department of Housing and Urban Development (HUD) made CDBG-DR funds available in 2012 to flood-ravaged Dauphin County in the wake of Hurricane Irene and Tropical Storm Lee in 2011. Dauphin County developed a HUD-approved action plan that identified the proposed use of all funds and how their use will address long-term flood recovery tied to those federally declared disasters. It is important to note CDBG-DR funding is gap financing, meaning that it can only be awarded, according to HUD's requirements, after any and all Federal Emergency Management Agency (FEMA) or Pennsylvania Emergency Management Agency (PEMA) funds have been expended.

The deadline for project applications for "Round 1" of CDBG-DR funding, as your letter references, passed in July of 2012, long before the sinkholes emerged in 2013. Round I funding is already committed to the 28 project applications that the county has received to date. However, some "Round II" funding is still available for projects tied to the 2011 flood-related disasters.

The county began accepting applications for Round II in 2012 and has already started approving funding for projects that met HUD's criteria.

Harrisburg did not submit its application for \$1 million in CDBG-DR funds to the county until January 15, 2015. After receiving the City's application, the Dauphin County Community and Economic Development submitted the application to HUD's Regional Office in Philadelphia for review.

On April 2, 2015, HUD notified the County that the City of Harrisburg's engineering report is far from complete. Additional information is needed to determine if the project demonstrates a "tieback" to Hurricane Irene and Tropical Storm Lee in 2011 – a HUD requirement. Furthermore, with the scope of the project expanding from 27 to 52 properties, the City will need more than \$1 million in CDBG-DR funds to cover the costs of the project, possibly in excess of \$6 million.


The County's Department of Community and Economic Development has notified the City's Building and Housing Department and engineer of the deficiencies in the application. Enclosed, please find a letter from the County's engineer that provides more detail regarding the deficiencies in the application. It is recommended that you follow up with the City's engineer to ensure the additional information provided adequately addresses the tieback to the 2011 federally declared disasters.

Recognizing the extent and severity of the damage caused by sinkholes, County officials have gone above and beyond to help the City. Additionally, County leaders have facilitated discussions between the City and the Pennsylvania Department of Community and Economic Development to secure additional funding opportunities through the state CDBG-DR program.

Rather than working together to solve this crisis affecting dozens of property owners, you are pointing fingers and politicizing the issue. Your divisive letter full of baseless accusations and misinformation is mystifying.

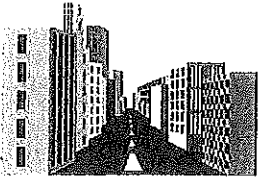
We look forward to receiving additional, up-to-date information from the City of Harrisburg so that HUD can determine whether the project qualifies for CDBG-DR funding.

Sincerely,



Chad Saylor
Chief Clerk/Chief of Staff
Dauphin County

cc: Hon. Wanda Williams, President, Harrisburg City Council
Hon. Patty Kim, State Rep., 103rd District
Hon. Rob Teplitz, State Senator, 15th District
Hon. Scott Perry, U.S. Congressman, 4th Congressional District
Hon. Lou Barletta, U.S. Congressman, 11th Congressional District
Hon. Pat Toomey, U.S. Senator
Hon. Robert P. Casey Jr., U.S. Senator



April 6, 2015

Mr. Wayne S. Martin, PE, City Engineer
MLK Government Center
10 N. Second Street
Harrisburg, PA 17101

RE: 1400 Block of South 14th Street CDBG-DR Program Application
Environmental Review Record

Dear Mr. Martin:

I am following up to our meeting of March 23, 2015 regarding the potential CDBG-DR funding for the 1400 Block of South 14th Street Sinkhole Mitigation Project. Since that meeting, I have further reviewed the CDBG-DR Application in detail, as well as the technical reports prepared by Gannet Fleming. I have also had a conversation with HUD regarding the Environmental Review approach and requirements. As I had indicated at the meeting, it appears that the Environmental Review will have to be for the entire planned project scope and coordinated between the various agencies providing funding for it. Therefore, although the City's CDBG-DR Application is for the design and replacement construction of South 14th Street, the Environmental Review must address the acquisition and demolition of the 27 homes, as well as the mitigation of the sinkholes and any other related activities.

To initiate the Environmental Review, which appears will be at least an Environmental Assessment; the following information needs to be provided:

1. In discussions with HUD, there must be a direct connection of the sinkhole mitigation project to Tropical Storm Lee relative to the utilization of CDBG-DR program funds. In reviewing the Gannet Fleming reports attached to the Application, I did not find any discussion relative to the sinkholes being caused as a direct result of Tropical Storm Lee. There is mention that the sinkholes could be the result of fluctuating groundwater levels due to heavy precipitation and runoff and seasonal groundwater fluctuations, as well as leaky utility lines. There is also discussion that sinkholes had developed in the area prior to 2011. It is necessary that the City provide further engineering and geotechnical/geologic information and detail that provide evidence, connectivity or some further connection with Tropical Storm Lee. I am available to meet with you and Gannet Fleming to further discuss this issue. Without the further connection to a declared disaster-related event, the project could possibly be deemed ineligible for CDBG-DR funding.
2. Please expand upon and provide additional detail regarding the overall project and scope of work. Which mitigation alternative is being implemented? Expand upon the indication in the reports

that subsidence may still be possible after mitigation. Provide a constructed concept plan of the final project. How will the open space be utilized? What is the final land use plan for the project area? How will stormwater be handled? It is indicated that 27 homes will be demolished. How many must be structurally repaired? What is the population and census data for the impacted project area?

3. The project must be submitted to PHMC for clearance review. Usually photos (front, back, side) of each structure being demolished or repaired are required. Since all of these were constructed around the same time, we'll try to obtain PHMC review based on a sampling of the residences. So provide photographs of a cross section of the typical residences being demolished in the project area, together with streetscape photos along 14th Street. I also need to know if this area is located in a Historic District.
4. The application mentions that the project is located near or within the 100 year flood plain. Are there any improvements proposed within the flood plain? This would include such facilities as stormwater basins, drainage facilities etc.
5. Research and a site investigation are needed to determine if there is any potential contamination or sites that could contribute contamination within the project area. Are there any above or underground storage tanks in the area? The Gannet Fleming reports indicate there is fill in the southern section of the South 14th Street area. What is the nature of the fill and does it possess any potential contamination. Documentation of any potential contamination sources and/or existing contamination needs to be provided.
6. A PNDI search must be performed for threatened and endangered species. Please provide.
7. With the proposed mitigation methods for the sinkholes, discuss any environmental impacts on the underground environment.
8. The Gannet Fleming reports discuss aging infrastructure as a likely potential source /cause of the sinkholes. Please discuss and present documentation that these sources are not the cause of or a major contributing factor to the current or future sinkhole development.
9. With the demolition of the 27 homes, what is the relocation plan for the residents? The environmental review must address the relocation activities.
10. What permits are anticipated to be required for the overall project? Has any correspondence or communication been initiated with the permitting agencies?
11. Provide an updated project budget identifying sources and uses of funds. This would be for the overall project not just the street replacement. It was mentioned at the March 23 meeting that the overall budget is \$6+ Million. The environmental review must be coordinated with any other

agencies which are sources of funds for the project. The CDBG-DR Application requests \$1,000,000 for South 14th Street design and construction. Break this out with regards to the rest of the overall project scope and budget.

12. Provide a tentative schedule for implementation and completion of the overall project.
13. Since pre-application has been made for HMGP funding, a meeting with PEMA/FEMA to discuss the overall Environmental Review. The review at a minimum must be coordinated with them.

If you should have any questions or need to meet to review any items required for the Environmental Review, contact me at your convenience. I would especially like to meet with PEMA/FEMA in the very near future. Also, since the connection with Tropical storm Lee is a key issue, let me know if and when we might meet with Gannet Fleming to discuss.

Respectfully,

Paul E. McNamee, President
McNamee Strategic Consulting, LLC

cc: George Connor, Dauphin County
Jackie Parker, City of Harrisburg