APPENDIX G

Analysis of National Nonstructural Committee Assessment

1.0 Nonstructural Assessment

One way to reduce the risk of structural damage during a flood event is to consider nonstructural alternatives. The term nonstructural is expansive and ranges from buying out a structure to installing an upstream gage to track water levels. The nonstructural assessment conducted for this study relied on only nonstructural alternatives with a direct relationship with reducing flood damage to structures. These alternatives include sewer backup check valves, filling subfloor (basement or crawl space) areas, relocating utilities, floodproofing, elevating, or acquiring buildings. Each structure in the De Soto study area was individually evaluated and the least cost alternative was recommended with a few important assumptions that are detailed in the subsequent sections.

1.1 Structures in the Floodway

The City of De Soto is currently operating under the regulatory floodplain dated April 5, 2006, but this study was conducted using the preliminary FIRMs expected to be finalized in June of 2019. One of the many updates to the revised 2019 Flood Insurance Rate Map (FIRM) is the increase in the size of the regulatory floodway. The floodway is a special flood hazard zone within the floodplain that carries the deeper and faster moving water. Structures and other development within the floodway cause the water to slow and back up resulting in higher localized flood elevations. As a result, the National Flood Insurance Program (NFIP) requires communities to prohibit encroachments within the floodway:

44 CFR 60.3(d)(3): *In the regulatory floodway, communities must prohibit encroachments, including fill, new construction, substantial improvements, and other development within the adopted regulatory floodway unless it has been demonstrated through hydrologic and hydraulic analyses performed in accordance with standard engineering practice that the proposed encroachment would not result in any increase in flood levels within the community during the occurrence of the base flood discharge.*

The revised 2019 FIRM shows a floodway within De Soto that includes 138 structures. Some structures in this area experience depths of flooding exceeding eight feet above the first floor and velocities of up to five feet per second, which, when combined with deep flows, is able to collapse structural walls. While structures re-zoned within the floodway are grandfathered into the new system, any substantial improvement costing more than 50% of the structures value will require either elevation above the 1% Annual Chance Exceedance (ACE) event or relocation/acquisition. This study's nonstructural alternatives and recommendations for structures in the floodway are therefore limited to elevation or acquisition.

1.2 Available Mitigation Approaches

Non-structural floodproofing is an umbrella term that incorporates flood mitigation techniques that do not involve structural methods such as berms, levees, floodwalls, flood gates, etc. Instead, non-structural flood-proofing can be broken down into three major strategies:

- 1. Dry or Wet Floodproofing
- 2. Elevation
- 3. Structure Acquisition or Relocation

Dry floodproofing attempts to keep water away from the structure by creating a watertight seal with exterior barriers such as impervious sheeting, waterproof walls, watertight shields for doors and windows

and drainage collection systems such as a sump pump. Dry floodproofing is best for slab foundation structures with flood depths three feet or less, which limits hydrostatic forces pushing on subfloor areas. If the structure has a subfloor area, it can be filled with sand or other material. This measure achieves flood risk reduction benefits, but is not recognized by the NFIP for any flood insurance premium rate reduction if applied to residential structures and cannot be used to bring any structure into compliance with a community's floodplain ordinance. Figure 1 shows a diagram that summarizes the features of dry floodproofing.

Figure 1. Nonstructural Dry Floodproofing Diagram

Wet floodproofing allows water to enter the structure by moving utilities, appliances, or other high value items to a higher elevation within the structure. The benefit of allowing water into a structure is to equalize or lessen the load on floors and walls from the effects of hydrostatic forces. While not typically recommended, a residential structure can be wet floodproofed by being constructed and finished with water resistant materials as shown in Figure 2. Wet floodproofing is best suited for warehouse structures given the open floor plans that can be retrofitted to elevate high value machinery and inventory. If the structure does have a subfloor area such as a basement, it is commonly recommended to fill the basement with sand or other material and relocate the lost square footage into a new addition above the base flood elevation. It is worth noting that wet floodproofing cannot be used to bring a residential structure into compliance with the community's floodplain management ordinance.

Figure 2. Nonstructural Wet Floodproofing Diagram

Elevating structures is more expensive than floodproofing but also provides more benefits by raising the structure above the base flood elevation. For this strategy, the structure is elevated from its existing foundation material onto a new foundation. Each foundation type has its own challenge to elevate with crawlspace foundations being easiest and slab foundations being the most challenging. Similar to other floodproofing alternatives, any utility from a basement would be lost as the only subfloor area allowed under NFIP regulations would be an enclosure with the appropriate amount of vents to allow for hydrostatic pressure equalization.

The analysis for this report assumes that subfloor areas such as basements are converted to enclosures and set on fill. For structures located in the floodway, elevating on fill is prohibited and piers or posts are utilized to limit floodway encroachment. Figure 3 shows a diagram that summarizes the features of elevation. The elevation mitigation approach assumes that each structure was elevated high enough to be greater than the base flood elevation.

Figure 3. Nonstructural Elevation Diagram

Structure acquisition (buyout) and relocations are mitigation strategies that remove the hazard from the floodplain, which is the only nonstructural alternative that permanently reduces flood risk. Relocations involve uplifting a structure onto a transport vehicle and relocating it to an area outside of the floodplain. Acquisitions involve purchasing and demolishing the home or building and generally restrict the deed to open space in perpetuity. Acquisition is generally the most expensive mitigation approach as it requires compensating the homeowner the full market value of the structure. Relocations were not considered as part of any recommendations due to cost, but remain viable nonstructural alternatives.

1.3 Mitigation Cost Assumptions

Each mitigation approach will vary in cost based on a variety of assumptions. The cost of nonstructural mitigation has been studied by the U.S. Army Corps of Engineers (USACE) in previous reports, and the cost estimates from those reports will be utilized for De Soto to prioritize which mitigation approach minimizes costs based on the perceived benefits. The costs in this report are not site-specific to the De Soto study area and should therefore only be relied on for comparing approaches and evaluating cost-effectiveness.

Costs for structural elevation were taken from the 2017 Whittier Narrows Dam Safety Modification Study and vary by the amount of elevation as shown in Table 1. The costs assume a building has a slab on grade foundation and is priced per square foot of livable square feet. Slab on grade foundations are the most expensive foundation to elevate as they lack easy access to the floor joists that crawlspace and basement foundations provide. The structural elevation estimate for this report also assumes elevating on a 2:1 fill slope, meaning adequate space must be present on the parcel to accommodate the increase in the size of the footprint of the structure. In addition to elevating on fill, other foundation types include piers, posts, columns, and piles.

Costs for dry and wet floodproofing were taken from the 2016 Ste. Genevieve Draft General Reevaluation Report. Dry floodproofing is estimated to cost \$23.32 per square foot for wood frame structures and \$21.17 per square foot for brick structures. These estimates include the cost of the veneer wall and watertight doors. Costs for buildings with a shared "party wall" were reduced by 50% to account for a section of the building not requiring mitigation. A cost of \$30 per square foot was determined to fill a basement or crawl space, which requires enough sand fill for an eight foot tall basement or three foot tall crawlspace. An additional \$1,000 was added to each floodproofing estimate to account for installation of a sewer check valve.

For wet floodproofing, utilities will be relocated from a subfloor area to above the first floor elevation. The relocations considered for this report were electricity (\$2.80 per square foot), plumbing (\$4.40 per square foot), and HVAC (\$6.70 per square foot). An additional \$7,200 was added for commercial warehouses, which require the relocation of electrical outlets, meter, fuse box and HVAC compressor.

Acquisition costs are based on the property value of the structure and is sourced from the appraised property value from the Jefferson County Tax Assessors database. Associated costs associated with acquisition include the cost of demolition, real estate fees and transferring the deed. These costs include \$45,000 for slab and crawlspace structures and \$63,000 for structures with a basement, and are in addition to the appraised property value. Costs associated with compliance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA) were not included.

1.4 Mitigation Cost Estimation

A preliminary cost estimate was developed for each structure using the four available mitigation approaches discussed in Section 1.2 and based on the cost assumptions from Section 1.3. The costs identified in this report are not an engineering recommendation and should only be used for comparing mitigation approaches and evaluating cost-effectiveness. The cost estimates used in this report were developed based on the structures following foundation types:

1. Basement

- a. Acquisition cost based on the market value of the building plus the cost associated with demolition, real estate fees and transferring the deed
- b. Elevation cost based on filling the basement with eight feet of fill, elevating the building above the base flood elevation, and relocating all plumbing and HVAC
- c. Floodproofing cost based on the flood elevation relative to the first floor:
	- 1. For structures with inundation less than the first floor elevation the cost is based on relocating all plumbing and HVAC and installing a sewer check valve
	- 2. For structures with inundation greater than the first floor elevation the cost is based on filling the basement with eight feet of fill, relocating all plumbing and HVAC, and installing a veneer wall, watertight doors and sewer check valve

2. Crawlspace

- *a.* Acquisition cost based on the market value of the building plus the cost associated with demolition, real estate fees and transferring the deed
- b. Elevation cost based on filling the crawlspace with 3 feet of fill, elevating the building above the base flood elevation and relocating all plumbing and HVAC
- c. Floodproofing cost based on the flood elevation relative to the first floor:
	- 1. For structures with inundation less than the first floor elevation the cost is based on relocating all plumbing and HVAC and installing a sewer check valve
	- 2. For structures with inundation greater than the first floor elevation the cost is based on filling the crawlspace with three feet of fill, relocating all plumbing and HVAC, and installing a veneer wall, watertight doors and sewer check valve

3. Slab

- *a.* Acquisition cost based on the market value of the building plus the cost associated with demolition, real estate fees, and transferring the deed
- b. Elevation cost based on elevating the building above the base flood elevation and relocating all plumbing and HVAC
- c. Floodproofing cost based on the flood elevation relative to the first floor:
	- 1. For structures with inundation less than the first floor elevation the cost is based on installing a sewer check valve
	- 2. For structures with inundation greater than the first floor elevation the cost is based on relocating all plumbing and HVAC, and installing a veneer wall, watertight doors and sewer check valve

2.0 De Soto Flood Mitigation Results

Each floodprone structure within the De Soto 1% ACE floodplain was evaluated for its structural attributes, hydraulic conditions and estimated cost of nonstructural flood mitigation. All recommendations in this report are preliminary and are subject to a detailed field survey and site-specific cost estimate.

2.1 Flood Mitigation Recommendation Methodology

The 1% ACE flood event recommendations identify the cost and approach to mitigating all 229 structures that are expected to be damaged during the flood event. The following sub-sections describe the mitigation methodology for how each recommendation was derived.

1. Acquisition

The rationale for acquisition was based on identification of acquisition as the least cost mitigation approach. Some structures were also identified for acquisition where acquisition was not the least cost mitigation approach. In these situations, acquisition was selected if the structure met any of the following criteria:

- 1. Located in the floodway and the cost was lower than elevation
- 2. Total cost within 25% of other nonstructural measures

It was assumed that since acquisition completely removes the flood hazard into perpetuity, that the property owner and city would elect to acquire the structure rather than paying marginally more for a mitigation measure that does not fully remove the risk of damage, especially for more infrequent flooding larger than the 1% ACE event.

2. Floodproofing

The rationale for floodproofing was based on the structure's foundation, occupancy type and local flood characteristics. Wet floodproofing was applied to commercial and industrial structures characterized similarly to a warehouse style building that could allow water to flow in without having to be concerned with hydrostatic pressures. Dry floodproofing was applied to all non-warehouse style structures experiencing less than three feet of flooding relative to the first floor elevation. Floodproofing structures with depths of flooding below the first floor was the most cost-effective alternative as most flood related damages could be mitigated by filling the subfloor area and relocating utilities above the first floor. For structures with flooding greater than the first floor elevation, the cost-effectiveness decreased given the additional veneer and watertight doors required to mitigate flooding. Floodproofing is typically the most common and cost-effective alternative, but given the large floodway, floodproofing becomes non-viable for a significant portion of the inventory despite flood depths being lower than three feet.

3. Elevation

The rationale for elevating structures was based on local flood characteristics and the least cost mitigation approach. Elevating structures is an effective flood mitigation approach up to 10 feet of rise and assuming proper slope grading and fill compaction, is not subject to hydrostatic pressures. Elevating structures has a high upfront cost from filling in subfloor areas and lifting structures onto a new foundation. As a result, elevation is limited to structures with significant flood depths, typically at least three feet, given that floodproofing is more cost-effective for shallower flood events. Elevation for the City of De Soto

represented the only feasible non-acquisition approach to avoiding flood damages in the floodway. As previously stated, the elevation to the structure would have to occur on piles, piers or other system that avoids encroaching the floodway and allows flood flows to bypass the structure.

2.2 1% ACE Flood Event Mitigation Recommendations

The list of nonstructural flood mitigation recommendations was compiled by the U.S. Army Corps of Engineers National Nonstructural Committee (NNC), which conducted an August 2018 site visit and surveyed ten structures with in the City of De Soto and Jefferson County. More information and the results of the site visit are located in Appendix D of the Floodplain Management Plan. The recommendations were informed by Appendix D, but in the case of the structures located within the revised regulatory floodway, the recommendations were changed to either acquisition or elevation.

Of the structures located within the 1% ACE floodplain in De Soto, 41% are recommended to be elevated, 31% to be acquired, 17% to be floodproofed, and the rest (11%) had inundation below the first floor, and therefore only required either a sewer check valve or relocation of utilities.

One structure of note is the De Soto Rural Fire Station at E. 201 Miller Street, which was visited and assessed by the National Nonstructural Committee during the site visit. The Fire Station is a first responder hub during emergencies and is also located in the 1% ACE (100-year) floodplain, and more importantly, the regulatory floodway on the 2019 revised FEMA maps. The original recommendation of the NNC was to wet floodproof and elevate utilities, which was based on the depth of flooding relative to the first floor elevation. While the first floor is approximately 4.8 feet below the base flood elevation (BFE), the NNC noted in Appendix D that the Fire Station had already elevated existing systems and utilities including a storage platform for equipment, etc.

Following communication between City Administration as well as the De Soto Rural Fire Station's Fire Chief, USACE St. Louis District Economists reviewed the assessment and recommendation. Upon further evaluation, it is the final recommendation of USACE that the De Soto Rural Fire Station be acquired and relocated to a location outside of the floodway. While the Fire Station has taken action to reduce the impacts of flooding on the structure and its contents, no other mitigation recommendation absent acquisition will prevent the Fire Station and its personnel from having its life safety mission put at risk. The Fire Station's location in the floodway and the fact that fire trucks must be deployed from a flooded structure to save others during a flood event creates a safety and social impact on the community. Therefore, it is **recommended** to acquire and relocate the De Soto Rural Fire Station.

The mitigation cost assumed in this Appendix is \$332,000 using RS Means, which is a commercial reference book used by construction contractors and industry professionals to determine budget estimates for construction. The costs have been depreciated to reflect the value of rebuilding the structure to its current age and location. The costs do not reflect the actual cost of constructing a new fire station. The acquisition cost for only this structure also does not reflect land value since RS Means does not estimate land value. Further research would need to be performed in order to determine a new location, the cost of that land, and the cost of building a new facility.

A full list of nonstructural flood mitigation recommendations is located in the enclosure below (Enclosure 1). The list includes other attributes such as parcel identification, site address, flood elevation, structure value and mitigation cost.

ENCLOSURE 1 Nonstructural Mitigation Analysis Enclosure

Mitigation recommendations indicated with (*) designate a recommendation by the USACE Nonstructural Committee during the site visit.

Upper Joachim Creek Floodplain Management Plan for the City of De Soto & Jefferson County, Missouri September 2019

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Total Cost of Recommended Mitigation Activities \$ 14,944,000