



MEMORANDUM

TO: Larry Cook, Mayor, City of Bonifay

FROM: Jennifer J. Green, CAE, DPL, President & CEO
Tim Parson, DPL, Vice President
James Sowinski, MBA, Director of Grants Management

DATE: February 17, 2024

RE: City of Bonifay Recreation Center Project – Status Update

During the course of the City of Bonifay's correspondence with the US Department of Housing and Urban Development (HUD), and as a requirement for the expenditures associated with HUD agreement B-22-CP-FL-0229, the City was required to complete an Environmental Review prior to undertaking activities associated with the project.

The initial step of this evaluation is completion of an Environmental Assessment to determine which level of final review the project will have to undergo. There are five possible levels of full review – ranging from an exemption to a full Environmental Impact Statement (EIS). It was our goal to ensure that the City would not be required to take measures beyond what is legally required.

Due to the burdensome nature of federal regulation, both the Environmental Assessment and Environmental Review are lengthy processes and are usually undertaken at significant expense through engineering and geotechnical and environmental research. As part of our services, Liberty Partners began the process of successfully completing this review on the City's behalf. It was our intent this process would translate to significant cost savings and effectively allow every possible dollar to go toward completion of work at the project site.

To be exempt from an environmental assessment, we needed to establish that this project achieves compliance with each applicable statute, EO, and regulation within HUD's 16 issue areas without formal consultation or mitigation. We completed Partner Worksheets for all 16 issue areas without additional cost or contracted consultation, as well as the Environmental Review Project Information. This was paired with numerous other attachments, which provided map data, correspondence from various state agencies, and other evidence that mitigation would not be required.

February 16, 2025

Page 2

This project does not involve new construction in an undeveloped natural area, incongruent visual, auditory, or atmospheric changes, nor does it involve working on a building of tribal association, and the current site will define the project's APE without off-site staging, in-fill transportation, or changes to traffic patterns. However, the project is adjacent to two Wetland areas, and Holmes County has eight (8) endangered species with 10 migratory birds and six (6) Native American Tribes listed with historical interest in the county. On the other hand, no critical endangered habitats are listed at the project site, and no Tribes currently reside in Holmes/Bonifay.

Because this project involves ground disturbance, we needed Florida SHPO support to substantiate/endorse that no adverse Historical Preservation effects are involved (i.e., to avoid Consultation with Tribes Under Section 106). In addition, we needed a biological evaluation verifying this project "May Affect, Not Likely to Affect" the County's federally listed endangered species. These final two document categories were subsequently completed, and the review finalized.

On February 12, 2025 we **finally** received notification from HUD that the Environmental Review justification package we prepared had been fully accepted, and thus the project was cleared to move forward. This included nearly 12 months of work preparing 16 different justification reports on the issue areas cited above as well as on-site inspections and coordination with several state agencies. Although next steps will be discussed at the project kick-off meeting with HUD on February 20, 2025, this approval and the project's conversion to an "Exempt" status represents a significant hurdle and accomplishment for both the City and our team at Liberty Partners. We believe the most significant red tape is behind us.

It goes without saying that the biggest advocate for the project funding has been Congressman Neal Dunn. To that end, we have had numerous meetings with his key staff to provide updates on working with HUD and other agencies. His staff – particularly Nicole Smith – has been incredibly helpful as we have navigated this cumbersome process. In fact, she was in our office in Tallahassee for a status meeting last week.

We take great pride in our work and are grateful that we were able to save the City significant costs and time that would have otherwise been imposed, had this been undertaken separately through environmental engineering.

Our next update will be following the February 20, 2025 HUD kickoff meeting. We anticipate having a rough timeline of planning and layout as well as construction. This will include preparing documents for a specific procurement process as well as assisting the City with preparing compliance documents throughout the remainder of the project.

cc: Rickey Callahan, City Clerk
Sierra Smith, Grants Coordinator
Nicole Smith, Office of Congressman Neal Dunn