

Summary of 8-Step Floodplain Analysis for the Meadows at Middle Settlement Senior Apartments Project

Step 1: Determine if the proposed action is in a 100-year floodplain.

This action is the redevelopment of an existing senior housing facility called the Meadows at Middle Settlement Senior Apartments (Meadows Apartments), located at 4300 Middle Settlement Road in the Town of New Hartford, Oneida County, New York.

The ten-acre apartment property is located on the 20-acre campus of the Presbyterian Homes Health Care Community. It is fully developed with 21 two-story housing structures, one one-story housing structure, two one-story non-housing/community structures, parking lots, access road, and yard areas. The apartment complex provides 149 affordable units for seniors.

Approximately 1.2 acres of the 10-acre Meadows Apartments property are within Special Flood Hazard Area Zone (SFHA) A1 (areas of 100-year flood where the base flood elevation has been determined), as indicated on the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) Community Panel Number 360535 0002 B, dated April 18, 1983. This map is attached to this document. Areas designated as a SFHA are those subject to inundation by the 1 percent annual chance flood (e.g., a 100-year flood), also known as the base flood.

Meadows Senior Living LP is proposing to redevelop a four-acre portion of the property west of Mud Creek, including approximately 0.5 acres that are in the 100-year floodplain. The redevelopment would include demolishing 11 existing structures (a total of 93 units), including the four housing structures and the community center structure that are located in the 100-year floodplain. The demolished structures would be replaced by three new three-story housing buildings and a new community center structure constructed outside the 100-year floodplain. The three new housing structures would contain a total of 93 units (84 one-bedroom units and nine two-bedroom units), double loaded corridors, and elevators, and would be designed to better accommodate mobility impaired residents.

Step 2: Notify the public of the intent to locate the proposed action in a floodplain.

An early public notice of proposed activity within the 100-year floodplain was published by the Governor's Office of Storm Recovery on November 25, 2015, (see attached Floodplain Early Notice). The notice requested comments from the public concerning floodplain and natural resource impacts of the proposed action. The notice also indicated that the proposed action would be evaluated for potential direct and indirect impacts associated with floodplain development and, where practicable, would be designed or modified to minimize potential adverse impacts to lives, property, and natural values within the floodplain. The notice was published in the Utica Observer-Dispatch and posted at <http://www.stormrecovery.ny.gov/environmental-docs>. The required 15-day period was conducted to allow for public comments, and comments were accepted either electronically or via written correspondence. No comments were received from the early notice concerning the proposed action.

Step 3: Identify and evaluate practicable alternatives to locating the proposed action in a floodplain.

Portions of the existing development at the Meadows Apartments property are located in the 100-year floodplain of Mud Creek. The proposed action is to remove the five structures in the 100-year floodplain on the western side of Mud Creek and replace them with the same number of units in new buildings located outside of the floodplain. Only some walkways and the existing access road and bridge across Mud Creek would remain in the western side of the 100-year floodplain. The structure in the 100-year floodplain on the eastern side of Mud Creek would remain.

Alternatives to the proposed action considered:

Alternative 1: In-Place Rehabilitation of Housing Structures

The rehabilitation of the structures damaged by the flooding would not remove the residential units from risk from future flooding. The amount of impervious surface in the 100-year floodplain would not be reduced. Rehabilitation of the existing structures would not allow for the structures to meet the current accepted design standards for accommodating senior and handicapped residents. The rehabilitated structures would still require eventual replacement in order to avert the loss of important affordable housing resources.

Alternative 2: In-Place Replacement of Housing Structures

The in-place replacement of the structures damaged by the flooding would not remove the structures from the 100-year floodplain. In-place replacement of the existing structures would allow for the structures to meet the current accepted design standards for accommodating senior and handicapped residents and would avert the loss of important affordable housing resources. Design and construction of new housing structures with base levels above the level of potential future flooding would be cost prohibitive and would require substantial grading and other changes to the 100-year floodplain. The amount of impervious surface in the 100-year floodplain would not be reduced.

Alternative 3: Demolition of the Housing Structures without Replacement

The demolition of the structures in the 100-year floodplain without replacement would reduce the amount of affordable housing available for seniors in the area and would not lead to a sustainable and economically viable outcome for the existing facility. The amount of impervious surface in the 100-year floodplain would be reduced.

Alternative 4: No Action Alternative

Not undertaking the project would not be consistent with the goals and objectives of the Oneida County New York Rising Community Reconstruction Plan. The plan identified the Meadows Apartments facility as an asset requiring protection from future flooding because it provides housing and care for senior residents. Without the project, the strategy to retrofit, protect or relocate public and non-profit facilities to mitigate future flood damages and to minimize interruptions in service would not be fulfilled. The residents would either continue to live in areas at risk for flooding or those units would be taken out of service reducing the amount of affordable housing available for seniors in the area and would not lead to a sustainable and economically viable outcome for the existing facility.

Step 4: Identify and describe the proposed action's direct and indirect effects associated with occupying or modifying the floodplain.

The 100-year floodplain on the property is all previously disturbed. The existing development includes impermeable surfaces associated with structures, parking lots, and walkways. The remaining area includes maintained landscaping of grass trees and shrubs. The five structures within the west bank 100-year floodplain would be demolished along with six other structures outside the 100-year floodplain. Three new housing structures and a new community center structure would be constructed outside the 100-year floodplain. Project activities within the floodplain include building demolition and construction activities would be limited to grading, replacement of some walkways, and re-landscaping. The construction of new buildings and parking lots would take place outside of the SFHA. Impermeable surface within the 100-year floodplain would be reduced. Only a small portion of the access road, the bridge, and some walking paths would remain in the 100-year floodplain on the west side of Mud Creek after construction. There would be no changes to the 100-year floodplain on the eastern side of Mud Creek as part of this project.

The short-term direct impacts to the 100-year floodplain would consist of demolition of the existing structures, parking lots, and walkways; construction of upgrades to the small amount of walkway and parking lot that would remain in the 100-year floodplain; and final grading and landscaping of disturbed

areas. Long-term direct impacts would include removal of structures, parking lots and some walkways from the 100-year floodplain and decrease of impermeable surface area. The proposed action represents short-term impacts to previously disturbed areas and a substantive long-term beneficial change to the condition of the 100-year floodplain.

Step 5: Identify methods to minimize the potential adverse impacts within a floodplain and to restore and preserve its natural and beneficial values.

The short-term impacts would be mitigated by best management practices for debris, dust, and erosion control during demolition and construction activities. Because the proposed action overall acts as a long-term mitigation by removing existing structures and impermeable surfaces from the 100-year floodplain, no additional methods to minimize adverse impacts are needed. The proposed action would enhance the floodplain's natural and beneficial values.

Step 6: Reevaluate the proposed action to determine if it is still practicable given its floodplain effects.

The proposed project would improve the facility's resilience to future storm events by moving the housing structures outside the 100-year floodplain. The project, as proposed, would reduce potential hazards to human safety, health, and welfare, and is considered practicable.

The no action alternative remains impracticable because there would be a reduction in the amount of resilient, sustainable, affordable housing for seniors.

Step 7: If the only practicable alternative is locating in a floodplain, publish a final public notice.

It has been determined that there is no practicable alternative to locating the project in the floodplain. This is due to the current presence of senior housing structures within the 100-year floodplain. The project would demolish the structures located in the floodplain.

A final public notice will be published in accordance with 24 CFR Part 55 for a minimum 7-day comment period. The final notice will detail the reasons why the project (demolition of structures located in the floodplain) must be located in the floodplain, a list of alternatives considered, and all mitigation measures taken to minimize adverse impacts and preserve natural and beneficial floodplain values.

All comments received during the comment period will be responded to and fully addressed prior to funds being committed to the proposed project, in compliance with Executive Order 11988 or 24 CFR Part 55.

Step 8: The proposed action can be implemented after steps 1 through 7 have been completed.

Implementation of the proposed action may require additional local and state permits, which could place additional design modifications or mitigation requirements on the project.