

Summary of 8-Step Floodplain Analysis for the Mews at Prattsville Project

The proposed project involves

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

This action is the development of a new flood-safe neighborhood called the “Mews at Prattsville” that would be located in a mostly undeveloped area on County Road 10 (Washington Street) northeast of the center of the Town of Prattsville, Greene County, New York. The Mews at Prattsville plan would be implemented in four phases to achieve development of a regional health care facility, a senior apartment complex, and affordable townhouses. Additional potential development could include a regional community/senior center that would also serve as an emergency shelter; development of that facility or any substantive changes to the project described herein would require additional environmental review.

The Mews at Prattsville site consists of three parcels: a 46.03-acre parcel that is currently owned by the town and two parcels totaling 8.81 acres that would be acquired by the town. The parcels are arranged north to south with the town owning the northernmost parcel (“Town Parcel”) and acquiring the southern parcels (“Spanhake Parcel” and “Fuchs Parcel”). Approximately 16.8 acres on the western portion of the Town Parcel is within Special Flood Hazard Area Zone (SHFA) AE (areas of 100-year flood where base flood elevation have been determined), as indicated on the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) Community Panel Number 36039C0158F, dated May 16, 2008. This map is attached to this document (see FIRM36039C0158F). Areas designated as a SHFA are those subject to inundation by the 1 percent annual chance flood (e.g., a 100-year flood), also known as the base flood.

There are four anticipated phases of the project: Phase I – Design, Operator Services, and Acquisition of Property; Phase II – Extension of Infrastructure; Phase III – Construction of the Regional Health Care Facility; and Phase IV – Construction of the Affordable Housing. For Phase II, the proposed installation of sanitary sewer lines includes an option to connect the sanitary sewer lines directly to the town’s wastewater treatment plant, and the town anticipates the construction of a secondary ingress/egress road, to be constructed on the Town Parcel that abuts the north boundary of the current Spanhake Parcel. The proposed road would connect with the existing gravel driveway that connects with County Route 7 by way of the town’s wastewater treatment plant property. This would provide emergency access in the event that the facility’s staff cannot reach the facility through the primary access entrance on Washington Street. It would also serve as an additional emergency evacuation route. The sewer pipeline and the secondary access road would follow the same path through the project site.

The portions of the project proposed for the health center, senior housing, and townhouses are not within an SFHA. Only the northern section of the secondary access road and the last section of the sanitary sewer line as it connects to the treatment plant would be within the 100-year flood zone. The sewer line would not create impermeable surfaces, and the portion of the secondary access road within the floodplain would not contain any electrical or mechanical equipment other than electrical wiring for street lights. Therefore, the proposed action represents no substantive change from the condition of the floodplain prior to Hurricane Irene and Tropical Storm Lee. An alternative to connecting the sanitary sewer line directly to the town’s wastewater treatment plant also is under consideration. It would involve installing approximately 350 feet of 8-inch sewer line running to a connection on Washington Street. The town would select the most feasible and cost-effective routing after cost estimate and scoping activities are completed.

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 GOSR on

December 18, 2014, (see attached Floodplain Early Notice). The notice also was e-mailed to interested parties (see attached Floodplain Early Notice_Agency Email). The notice requested comments from the public concerning floodplain and natural resource impacts of the proposed economic revitalization and storm mitigation. The notice also indicated that the NYSDEC would evaluate proposed actions under the program for potential direct and indirect impacts associated with floodplain development and, where practicable, would design or modify proposed actions to minimize potential adverse impacts to lives, property, and natural values within the floodplain. The notice was published in the Windham Journal 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.

Two portions of the proposed project would lie within the 100-year floodplain; the secondary access road and the sewer pipeline. The part of the secondary access road that would lie within the 100-year floodplain already exists as the access road from County Road 7 to the wastewater treatment plant. The proposed project's secondary access road would connect to this existing road. There are no alternatives for the secondary access road.

Part of the proposed sewer pipeline would lie within the 100-year floodplain. Since the Prattsville wastewater treatment plant lies within the 100-year floodplain, any new connection to the plant requires the sewer pipeline to go through the floodplain. An alternative to connecting the sanitary sewer line directly to the town's wastewater treatment plant also is under consideration. It would involve connecting to the existing sewer system by installing approximately 350 feet of 8-inch sewer line running to a connection on Washington Street. This connection would require the construction of a new lift station to overcome the height difference between proposed project site and the existing sewer system. The town would select the most feasible and cost-effective routing after cost estimate and scoping activities are completed.

Alternatives to the proposed action, as a whole, were also considered:

Alternative 1: Alternative Housing Sites

Five other properties within Prattsville were considered as a potential location for the proposed project. However, these locations were not deemed suitable for development for the following reasons:

- Not available for sale;
- Did not have adequate access to water or sewer infrastructure; or
- Were too far from the center of Prattsville for the proposed health center to be readily available to the town population.

A property north of the Spanhake Parcel on CR 10 was originally available for sale until the owner decided to sell only within his family. The Becker property was acquired by the Prattsville Fire District and a joint development proposal was declined by the Fire Commission. A property that had been acquired by the NYCDEC was considered for a land exchange, but NYSDEC rules restricted the ability to take the property out of their inventory. Two other properties were briefly considered: one was outside the water and sewer service district and the cost of extension of utilities would be prohibitive; the other was too far from the town center and could only be accessed by a road that had been compromised during the earlier flood events.

Alternative 2: No Action Alternative

Not undertaking the project would not be consistent with the goals and objectives of the Prattsville NYRCR and other local and state plans. The town would not realize its housing and land use goals because there would be no increase in the availability of resilient, sustainable, affordable housing for seniors. Without the project, planning goals to move vulnerable population outside the flood zone would be delayed. These populations would continue to live in areas at risk for flooding. Currently, there is no health care facility within the Town of Prattsville, and the town is considered a “Medically Underserved Area” by the US Department of Health and Human Services. Under No Action conditions, there would continue to be a lack of a health care facility for community residents.

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

While the proposed rehabilitation would occur within the 100-year floodplain, the proposed action represents no substantive change from the condition of the floodplain prior to Hurricane Irene and Tropical Storm Lee.

Although portions of the property involved in the proposed action are within the floodplain, development of for the health center, senior housing, and townhouses would be outside the floodplain. Approximately 290 feet of the northern section of the proposed secondary access road and the sanitary sewer line as it connects to the wastewater treatment plant would be within the 100-year flood zone. The existing wastewater treatment plant and the gravel road from County Route 7 already lie within the 100-year floodplain. The area within the 100-year floodplain area through which the new portion of secondary access road and sanitary sewer pipeline would cross is nearly flat, cleared of trees and shrubs, and part was previously disturbed by construction of the existing waste treatment plant. The new portion of the secondary access road within the floodplain would not contain any electrical or mechanical equipment other than electrical wiring for street lights, limiting modifications to the floodplain. The sanitary sewer pipeline would follow the same route as the secondary access road through the project site until reaching the wastewater treatment plant. There would be minimal impacts to the floodplain by the project.

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

The sewer line would follow the same route as the secondary access road and would not create impermeable surfaces. The portion of the secondary access road within the floodplain would not contain any electrical or mechanical equipment other than electrical wiring for street lights. An alternative to connecting the sanitary sewer line directly to the town’s wastewater treatment plant also is under consideration. It would involve installing approximately 350 feet of 8-inch sewer line running to a connection on Washington Street. The town would select the most feasible and cost-effective routing after cost estimate and scoping activities are completed. Therefore, the proposed action represents no substantive change from the condition of the floodplain prior to Hurricane Irene and Tropical Storm Lee.

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

The proposed action is viewed as practicable because it will enable Prattsville to rebuild the community in a more resilient way by locating the development above the floodplain. The New York Rising Community Reconstruction Program (NYRCR) for Prattsville discusses six overarching strategies to reduce risks from future flooding and recover from the recent flooding. The proposed project would fulfill the first strategy to “ensure that all residents have an exceptional quality of life and that vulnerable seniors are safe” by relocating seniors out of the floodplain and addressing limited access to health and social services. Prattsville is considered a “Medically Underserved Area” by the US Department of Health and Human Services. The proposed project would improve the town’s resilience

to future storm events by providing regionally accessible health care outside the 100-year floodplain. This facility would also serve the population of portions of Greene, Delaware, Schoharie, Ulster, and Albany Counties and is anticipated to serve the needs of a population that includes, but is not limited to, the Towns and Villages of Prattsville, Blenheim, Preston Hollow, Windham, and Roxbury. The residents of these communities currently travel significant distances to address their health care needs at medical facilities in Oneonta, Kingston, and Albany. The project, as proposed, would minimize potential hazards to human safety, health, and welfare.

The no action alternative also remains impracticable because there would be no increase in the availability of resilient, sustainable, affordable housing for seniors. Without the project, planning goals to move vulnerable population outside the flood zone would be delayed. These populations would continue to live in areas at risk for flooding. Under No Action conditions, there would continue to be a lack of a health care facility for community residents.

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: 1) without the project, there would be no increase in the availability of resilient, sustainable, affordable housing for seniors; planning goals to move vulnerable population outside the flood zone would be delayed, and these populations would continue to live in areas at risk for flooding; and there would continue to be a lack of a health care facility for community residents; 2) alternative locations within Prattsville outside of the 100-year floodplain were unavailable for purchase, did not have adequate access to water or sewer infrastructure, or were too far from the center of Prattsville for the proposed health center to be readily available to the town population; and 3) the limited scope and impact of the proposed project related to impacts on human health, public property, and floodplain values.

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 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.