Summary of 8-Step Floodplain Analysis

Application ID: NCR38959

Owner: Borough of Keansburg

Address: Various locations in Keansburg

Activities: Storm drainage improvements and commercial façade rehabilitation

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

This action is located in a 100-year floodplain. The entire proposed project site is located within Special Flood Hazard Area AE Zone (area of special flood hazard with water surface elevations determined), as indicated on the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) Panel 34 of 457 Number 34025COO34F, revised September 25, 2009 and the FEMA Post-Sandy Preliminary Work Map. Both maps are attachments to this document (see NCR38959_FirmPanel No34025C0034F_09-25-09_NCR_TO1028 and NCR38959_FloodplainManagementand FloodInsuranceMap_NCR_TO1028). Areas designated as a Special Flood Hazard Area are those subject to inundation by the 1 percent annual chance flood (e.g., a 100-year flood), also known as the base flood.

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 NJDEP on September 5, 2014 in English and Spanish (see NCR38959_Keansburg_FloodplainEarly Notice_English_NCR_TO1028 and NCR38959_Keansburg_FloodplainEarlyNotice_Spanish_ NCR_TO1028, respectively and NCR38959_Keansburg_FloodplainEarlyNoticeAffidavit_ AsburyParkPress_NCR_TO1028 and NCR38959_Keansburg_FloodplainEarlyNoticeAffidavit_ ReporteHispano_ NCR_TO1028). 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 NJDEP 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 Asbury Park Press and Reporte Hispano and posted at http://www.state.nj.us/dca/divisions/sandyrecovery/review/. 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 (see NCR38959_Keansburg_Floodplain EarlyNotice_Comments_NCR_TO1028).

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

Two alternatives to the proposed action within the 100-year floodplain were considered:

Alternative 1: Relocate the Proposed Action Outside of the 100-year floodplain

A GIS analysis using the latest FEMA Preliminary Work Map data was conducted to characterize the floodplain within the borough:

- Approximately 87 percent of land surface within the borough is classified as being entirely or partially within the 100-year floodplain (Zones "AE" and "VE").
- Approximately 10 percent of the land surface within the borough is classified as being entirely or
 partially outside the 100-year floodplain but susceptible to the 0.2 percent annual chance flood
 hazard (i.e. the 500-year flood) the "Shaded X" Zone.

• Less than 3 percent of the land surface within the borough is classified as being entirely or partially outside the 100-year floodplain and 500-year floodplain – the "Unshaded X" Zone.

Therefore, relocating the proposed project to another available nearby area would not necessarily avoid floodplain effects because the intent of the project is to assist in the revitalization of the commercial business district of Keansburg.

Alternative 2: No Action or Alternative Actions that Serve the Same Purpose

A no action alternative was considered and rejected because the three locations for drainage improvement and storm mitigation correspond to three separate drainage areas for a combined drainage area of 237 acres, about 46 percent of the total land area of the town. Work outside these areas would not reduce or potentially eliminate flooding issues.

With regard to the façade improvements, 30 of the 84 commercial businesses in town remain vacant. According to NJ Department of Community Affairs (DCA), the Borough ranks 5th in the state in property tax reductions with revenue loss of \$27,596,000, and 1,291 commercial and residential properties had their structures devalued due to damages caused by Super Storm Sandy. All facades proposed for improvement are located within the floodplain and locating work outside the flood zone would fail to restore value and tax ratables and revitalize the affected commercial district.

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

While the proposed drainage improvements/storm mitigation measures and streetscape improvements would occur within the 100-year floodplain, the proposed action represents no substantive change from the pre-Superstorm Sandy condition of the floodplain. Drainage improvements and storm mitigation measures would reduce or eliminate flooding.

The project would replace an existing outdated storm drainage system, reconstruct existing sidewalks, crosswalks and curbing. Façade rehabilitation would include repointing brickwork, power washing exteriors, painting and replacing windows and doorways as well as rehabilitation of the commercial buildings' exteriors by clearing and installing stucco, awnings, and lightings. The project would not increase impervious coverage or floodplain development within the urbanized commercial business district; nor would rehabilitation of the existing buildings change the building footprint or elevation.

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

As noted in Step 4, the proposed project would have no adverse effects on the floodplain and would not degrade its natural and beneficial values.

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 avoids significant adverse impacts to the floodplain in the local vicinity while helping to meet the community's need for economic revitalization to support local employment and the tourism industry. Relocation of the project to another site within the business district would not avoid or further minimize impacts to the floodplain nor meet the intent of the project. The project, as proposed, would minimize potential hazards to human safety, health, and welfare.

The no action alternative also remains impracticable because it will not satisfy the need for post-Hurricane Sandy economic revitalization within this substantially impacted community.

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) the need for storm mitigation within 3 specific areas with a combined drainage area of 237 acres, about 46 percent of the total land area of the town surface area, 2) the need to revitalize the local economy of Keansburg Borough through improvements within the commercial business district; 3) the lack of alternative locations outside of the 100-year floodplain related to the physical geography of this coastal community; and 4) 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 taken into consideration prior to implementation of 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.