



EXECUTIVE ORDER 11988 8-STEP DECISION MAKING PROCESS PROTECTION OF FLOODPLAINS

FITCHBURG THEATER BLOCK

689-717 MAIN STREET, FITCHBURG, MASSACHUSETTS 01420

ATLAS PROJECT NO. 6000007152

PREPARED FOR:

Fitchburg State University
10 Pearl Street
Fitchburg, Massachusetts 01420

PREPARED BY:

Atlas Technical Consultants LLC
10 State Street, Suite 100
Woburn, Massachusetts 01801

November 19, 2024



Introduction

The property address is 689-717 Main Street, Fitchburg, Worcester County, Massachusetts. The 0.65-acre single parcel of land is developed with a single building housing five retail spaces on the ground level along Main Street, a second story along Main Street housing Fitchburg State University classrooms and activity spaces, and an abandoned three-story theater behind. A basement level is present along the front (southern) portion of the building. The property building was built in 1927 and is located in a nominated historic district. The property parcel is identified by parcel ID 42-17-0 according to the City of Fitchburg Assessor's Office.

The project is seeking funding through a federal Community Project Fund Grant, Grant # B-23-CP-MA-0679, administered by the United States Department of Housing and Urban Development (HUD), to complete repairs on the property. The project includes repairs to the exterior envelope of the building (roofing, brick repointing, windows, doors, etc.), which is currently in poor condition.

Step 1: Determine whether the action is located in a 100-year floodplain or wetland

The 100-year floodplain is defined by 24 CFR 55.2(b)(9) as: "... the area subject to inundation from a flood having a one percent or greater chance of being equaled or exceeded in any given year."

Atlas reviewed the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) for the City of Fitchburg, Massachusetts, Community-Panel Number 2503040008C, dated September 18, 1991. The central portion of the property parcel, including the central and rear (northern) portions of the property building, is located in Zone A17, designated as a Special Flood Hazard Area with Base Flood Elevation. The southern portion of the property parcel is located in Zone B, "areas between limits of the 100 year flood and 500 year flood or certain areas subject to 100 year flooding with average depths less than one foot, or where the contributing drainage area is less than one square mile, or areas protected by levees from the base flood." A copy of the current FEMA FIRMette map is attached.

A preliminary revised FEMA FIRM, dated May 5, 2023, is available that shows the entire project property outside of any floodplains. However, HUD guidance indicates that the most stringent of current or preliminary floodplains must be used. Since the current map shows floodplains existing on the project property, that map is the most conservative and must be used.

According to the National Flood Insurance Program ("NFIP") Community Status Book, the property is located in Community ID # 250304, which is a participating community in the NFIP. As a portion of the property structure is located within the Special Flood Hazard Area (100-year flood zone), flood insurance is required to be carried on the structure, per the requirements of the NFIP. As such, the property owner currently carries flood insurance coverage.

Based on review of adjacent surface grade levels surrounding the property building, which are relatively flat, and fact that the edge of the Special Flood Hazard Area (floodplain) crosses the south-central portion of the property, the base flood elevation (454.25 feet elevation) is estimated to be at approximately surface grade along the north side and northern half of the east side of the

building. The lowest exterior grade elevation on the north and east sides of the building is approximately 452 feet elevation, which is approximately two feet below current base flood elevation.

Based on project drawings, existing basement floor elevation is 453.95, approximately 0.7 feet below current base flood elevation. However, the basement only exists in the north and south ends of the building. Only the basement in the north end of the building is partially within and contiguous with the Special Flood Hazard Area. The building has a concrete foundation with only one opening (doors, windows, vents, etc.) into the northern basement area that extends down to grade level. This is a door that enters the out-of-use rear boiler room addition, which has a doorway entrance with threshold at grade level, approximately 454.1 feet elevation, which is just below the current base flood elevation of 454.25 feet. The bottom of the next lowest elevation openings (vent openings into the rear attached out-of-use boiler room) is approximately 454.5 feet elevation, slightly above current base flood elevation. There are also several windows in the basement level along the northern and northeastern elevations with bottoms of openings at approximately 455.5 feet elevation, approximately one foot above current base flood elevation.

Step 2: Involve the Public in Decision-Making Process

A public notice describing the project was published in the Lowell Sun, a local paper, on October 31, 2024. The ad targeted local residents. A copy of the published notification is kept in the project's environmental review records and attached to this document. The required 15 calendar days were allowed for public comment. As required by regulation, the notice also included the name, proposed location, and description of the activity; total number of floodplain acres involved, and the responsible entity contact for information as well as the location and hours of the office at which a full description of the proposed action could be viewed.

Step 3: Determine if there is a Practicable Alternative

The project is being undertaken at the proposed location because it is a beneficial renovation of an existing historical building that is an integral part of Fitchburg's historic downtown urban area. The project will weatherproof the exterior envelope of the building to prevent further deterioration of the envelope and unoccupied interior of the building. Future work will include renovation of the main theater area into usable performing arts space, which is expected to be used by Fitchburg State University and the community, improving the economic and cultural vitality of Fitchburg.

The alternative action is no renovation, which would eliminate the beneficial re-use of this existing historical building that anchors a historic district in downtown Fitchburg. No action would result in further damage to the historical building since the exterior envelope (including roof) is in poor condition and allowing infiltration of rain. Therefore, the alternative action is not considered practicable.

Step 4: Identify Adverse and Beneficial Impacts

Atlas analyzed potential direct or indirect impacts to floodplains that might result from the proposed action.

The following factors were considered:

1. Natural Environment
2. Social Concerns
3. Economic Aspects
4. Legal Considerations

Natural Environment

The floodplain occupying a portion of the project parcel currently serves no beneficial purpose as it is occupied by the existing building and surrounding paved areas. Approximately 0.4 acres of the project building falls within the 100-year floodplain.

In contrast, renovating an existing building rather than constructing new performing arts buildings/facilities in an undeveloped area (a “greenfield”) eliminates the need to disturb undeveloped land for the purpose, thereby preserving the natural environment.

Social Concerns

The project is being undertaken at the proposed location because it is a beneficial renovation of an existing historical building that is an integral part of Fitchburg’s historic downtown urban area. The development will enhance the cultural and social vitality of this urban area.

There are no adverse social impacts of the proposed project.

Economic Aspects

The proposed property renovation provides beneficial economic impacts by enhancing the vitality of this urban area in Fitchburg, a city which in its recent history has struggled economically. The project will also employ construction workers and craftspeople during renovation work. There will be no demographic changes or displacement associated with implementation of the proposed project. Therefore, there will be no adverse socioeconomic impact to the area, and in fact, there will be a positive socioeconomic benefit to this area of the city once the full planned renovation of the theater building is completed in the next several years.

The only potential economic adverse impact of the proposed project would be potential flood damage to the theater building being renovated as part of the project. However, as described elsewhere in this document, there is little risk of flood damage to the building. See Step 5 for planned mitigation measures to minimize any potential risk.



Legal Considerations

According to the City of Fitchburg zoning map, the property is zoned as “CBD” or Central Business District, with Student Housing overlay zoning. The project will not result in a change in current use of the property building, which is in compliance with existing zoning. The project developer (Fitchburg State University) has been working closely with local and state agencies to move this project forward and meet relevant regulatory requirements.

Atlas is unaware of any deed restrictions or lease restrictions with respect to floodplains that would be violated by the proposed action.

Step 5: Mitigate Adverse Impacts

The floodplain occupies the northern portion of the developed footprint of the property building, with the current base flood elevation just above the basement floor level. There is a basement within the northern portion of the project building which could theoretically flood if floodwater could enter the basement space. However, the foundation of the building is concrete and there are only a few openings (windows, vents) into the basement space on the north and east sides of the building contiguous with the Special Flood Hazard Area, and the lowest portion of those openings is at least a foot above base flood elevation. The one exception to this is a door that enters the out-of-use rear boiler room addition, which has a doorway entrance with threshold at grade level, or approximately 454.1 feet elevation, which is just below the current base flood elevation of 454.25 feet. The preliminary revised FEMA FIRM (2023) shows the entire project property outside of any floodplains.

The project entails renovations of the exterior envelope of the central and northern portions of the historical theater building, which will eliminate water intrusion problems and prevent further damage to the interior of the building.

Mitigation measures to limit future flood damage will include further sealing the lower façade of the building to floodwater intrusion along the northern and eastern sides of the building by sealing certain existing openings into the northern basement area. This will include windows, vents, and one doorway with bottom-of-opening elevation of 456.25 or lower, within two feet above the current base flood elevation of 454.25 feet. These openings will be sealed with concrete masonry unit (CMU) block, brick, or equivalent, mortared into place.

The property will also be covered by a current flood insurance policy. In the event flood conditions arise, local law enforcement and the emergency broadcast system will warn occupants.

Step 6: Re-Evaluate Alternatives

The proposed renovation of the historical theater property, an important historical building in a nominated designated historical district, would not occur under the no-action alternative. The no-action alternative is not considered practical as the benefits of the proposed action would not be achieved, and instead the building would continue to decay and/or require demolition. In addition,



no impact to floodplains will occur since the building to be renovated already exists and will not be expanded or have its use changed. No other alternatives were considered.

Step 7: Announce and Explain Decision to the Public (Notice)

Upon finalization of this 8-Step Process, a final public notice describing the findings will be published in the Lowell Sun, a local paper. As required by regulation, the notice will include the name, proposed location, and description of the activity; total number of floodplain acres involved; and the responsible entity contact for information as well as the location and hours of the office at which a full description of the proposed action can be viewed. The required 7 calendar days will be allowed for public comment. A copy of the published notification will be kept in the project's environmental review records.

Step 8: Implement Proposal with Appropriate Mitigation

Atlas has prepared this "8-Step Process" report in order to assist with the requirements of Executive Order 11988, "Protection of Floodplains" and procedures contained in 24 CFR Part 55. There are many beneficial aspects of the project at the proposed location, which is a vacant portion of a historical building in poor condition in an urban downtown area of Fitchburg. There will be no impact on floodplains caused by the project. No-action alternatives are not practicable, and in fact would result in further damage to the historical building since the exterior envelope (including roof) is in poor condition and allowing infiltration of rain. Simple mitigating actions will be taken by the project team to prevent future flood damage.

Based on the completion of this 8-Step Process, it is recommended that the funding be approved.

Atlas Technical Consultants

A handwritten signature in black ink, appearing to read "Daniel P. White".

Daniel P. White, PG
Senior Project Manager
Phone: (781) 404-1432
Email: daniel.white@oneatlas.com

**APPENDIX I
SUPPORTING DOCUMENTS**



ORDER DETAILS

PREVIEW FOR AD NUMBER NY01289740

Order Number:

NY0128974

External Order #:

2657937

Order Status:

Approved

Classification:

General Legal Notices & Bids

Package:

Legals MA

Final Cost:

\$668.98

Payment Type:

Account Billed

User ID:

W0014382

Username:

1382876

Early Notice and Public Review of a Proposed Activity in a 100-Year Floodplain
To: All interested Agencies, Groups, and Individuals

This is to give notice that the City of Fitchburg has determined that the following proposed action under federal Community Project Fund Grant, Grant #B-23-OP-MA-0679, is located in the 100-year floodplain, and the City of Fitchburg will be identifying and evaluating practicable alternatives to locating the action in the floodplain in the event impacts of the proposed action as required by Executive Order 11988, in accordance with HUD regulations 24 CFR 50.20 Subpart C Procedures for Making Determinations on Floodplain Management and Protection of Wetlands. The proposed entails repair to the exterior envelope of the Fitchburg Theater Block building (roofing, brick repointing, windows, doors) located at 699-717 Main Street in Fitchburg, Worcester County, Massachusetts.

The interior of the theater building will be renovated during a future phase of construction. The 100-year floodplain as shown on current FEMA maps occupies approximately 0.12 acres of the building footprint (project area), and currently serves limited beneficial purposes as the project area is largely disconnected from the rest of the floodplain along the Nashua River by other buildings and in the center of the proposed urban downtown area. Preliminary revised floodplain maps produced by FEMA in 2023 indicate that the project parcel would be outside of the floodplain.

There are three primary purposes for this notice. First, people who may be located or active in floodplains and those who have an interest in the protection of the natural environment should be given an opportunity to express their concerns and provide information about these areas. Commenters are encouraged to offer alternative sites outside of the floodplain, alternative methods to serve the same project purpose, and methods to minimize and mitigate impacts. Second, an adequate public notice program can be an important public educational tool. The exchange of information and request for public comment about floodplains can facilitate and enhance Federal efforts to reduce risks and impacts associated with the occupancy and modification of these special areas. Third, as a matter of fairness, when the Federal government determines it will participate in actions taking place in floodplains, it must inform those who may be put at greater or continued risk.

Written comments must be received by the City of Fitchburg at the following address on or before November 16, 2024: City of Fitchburg, Department of Community Development, 718 Main St., Fitchburg, MA 01420, 978-829-1890 Attention: Kimberly LeBlanc. A full description of the project may be obtained at the Community Development or by visiting our website www.fitchburgma.gov/cdbg. Comments may also be submitted via email to cdbgcomments@fitchburgma.gov on 10/31/2024 #NY0128974

ACCOUNT INFORMATION

FITCHBURG COMMUNITY DEVELOPMENT MA Legals

718 MAIN STREET

FITCHBURG, MA 01420

978-829-1890

CDalton@fitchburgma.gov

FITCHBURG COMMUNITY DEVELOPMENT

TRANSACTION REPORT

Date

October 29, 2024 4:07:22 PM EDT

Amount:

\$668.98

SCHEDULE FOR AD NUMBER NY01289740

October 31, 2024

The Lowell Sun Legals