

**New York City Department of Environmental Protection
Bureau of Water Supply**

Evaluation of the New York City-Funded Flood Buyout Program

June 2018

*Prepared in accordance with Section 4.2 of the NYSDOH
2017 Filtration Avoidance Determination*



Prepared by: DEP, Bureau of Water Supply

2017 FAD Deliverable:

Based on the requirements of the 2010 Water Supply Permit (WSP), submit a program evaluation report on the New York City-Funded Flood Buyout Program, due June 15, 2018. A second evaluation report is due June 15, 2021. The City shall ensure that funding for full implementation of this program is continued during the evaluation period.

1. Introduction

The Revised 2007 Filtration Avoidance Determination (FAD) and the 2010 Water Supply Permit (WSP) required the New York City Department of Environmental Protection (DEP) to develop a New York City-Funded Flood Buyout Program (NYCFFBO, or the Program) allocating at least \$15 million to acquire flood-damaged or flood-threatened properties. The purpose of the Program is to secure permanent protection of key properties for floodplain management and flood hazard mitigation throughout the West of Hudson watershed. The terms of the NYCFFBO were developed through negotiations with watershed stakeholders from 2014 to 2016. These terms are codified in the NYCFFBO “Process Document” (dated June 1, 2016) that outlines how the program would be implemented, and are further authorized by a June 14, 2016 modification to the WSP and the “Second Supplemental Side Agreement Among West of Hudson Watershed Stakeholders” (dated July 28, 2016). Implementation of the NYCFFBO on a property-specific basis commenced in the second half of 2016. The 2017 FAD requires DEP to evaluate the NYCFFBO by June 15, 2018 and to conduct a second evaluation by June 15, 2021.

As described in the Process Document, the Program is designed to be community-driven, where properties are first considered by the local municipality, and if approved are then submitted to DEP for possible inclusion in the Program. Consistent with this framework, the NYCFFBO is implemented by DEP in partnership with local municipalities, County Soil and Water Conservation Districts (SWCDs), Cornell Cooperative Extension and the Catskill Watershed Corporation (CWC). The NYCFFBO is designed to operate during periods between FEMA-declared flood events, which allows for leverage of external funding for additional acquisitions supported by FEMA and/or New York State in the event of a new flood disaster declaration. Ownership of most properties to be acquired under NYCFFBO will be offered to local municipalities, and all properties acquired will be protected by a conservation easement to be conveyed to New York State.

As detailed below, implementation of the NYCFFBO started slowly, with the period 2014 to 2016 focusing on program development. Since 2016, however, property identification, appraisal and acquisition activities have accelerated quickly, and the Program has established itself as an increasingly effective tool to promote flood hazard mitigation in the West of Hudson watershed. Sections 2 and 3 of this report provide an overview of the history and structure of the NYCFFBO, while Section 4 describes the acquisition process. Section 5 has a detailed discussion of program status and metrics and Section 6 provides four case studies demonstrating how the Program has been implemented in watershed communities. Section 7 describes challenges faced by the Program, and Section 8 provides a summary conclusion and recommendations.

2. Background and History

The City first participated in the acquisition of flood-damaged properties in response to January 1996 floods, eventually acquiring 28 properties in partnership with Delaware County, New York State and FEMA through the FEMA Hazard Mitigation Grant Program.

Following Tropical Storms Irene and Lee in 2011, flood hazard mitigation, including buyouts, again became a focus among watershed stakeholders. The City agreed to participate in the FEMA Program after a request from three watershed counties: Delaware, Greene and Ulster, which resulted in the acquisition of 37 properties by the City or local municipalities. At the urging of local communities, the Revised 2007 FAD called for DEP to submit a plan by April 30, 2014 for a new City-funded flood buyout program. The key features of the NYCFFBO are community buy-in and, depending on local interest, community ownership of properties (similar to the FEMA Program), with the City considering ownership where there is no interest by the municipality. The NYCFFBO employs two unique valuation policies to maximize landowner interest while staying true to the spirit of the fair market value commitment in the 1997 Watershed Memorandum of Agreement (MOA) and the 2010 WSP. First, the NYCFFBO employs the FEMA policy of using up to three appraisals¹ to determine the purchase price; and second, it establishes fair market value as of the appraisal date, while assuming the condition of the property absent damage caused by flooding.

3. Program Structure

From April 2014 through June 2016, DEP worked closely with watershed stakeholders to establish rules for the NYCFFBO that aligned with stakeholder interests and addressed local concerns. The Process Document established the following five categories of properties that may be eligible for acquisition under the NYCFFBO:

1. **Hydraulic Study** – properties identified through a formal engineering analysis, such as a Local Flood Analysis (LFA), as necessary to complete a flood-resilience project;
2. **Relocation** – properties eligible for CWC assistance to reconstruct an improvement elsewhere; funded under CWC’s Flood Hazard Mitigation Implementation Program;
3. **Stream Project** – properties necessary for completion of a community-approved Stream Project;
4. **Erosion** – properties at risk from an erosion hazard; and
5. **Inundation** – properties at risk from an inundation hazard.

Program policies and procedures were designed to allow maximum flexibility for the municipalities to opt into the Program, to decide whether to own individual properties, and to pursue possible future development of any upland (non-floodplain) portions of properties where the town does acquire a parcel. It was agreed that the City would not solicit landowner participation, but rather would pursue acquisition of a property once a landowner and municipality concurred on opting into the Program. For a property to be acquired under the NYCFFBO, the municipality must first approve of the acquisition by resolution.

To facilitate community involvement, the NYCFFBO uses non-City Outreach and Assessment Leads that are identified by local communities. Outreach Leads explain the Program to potential participants and officials, and they coordinate the opt-in process. Assessment Leads determine whether an erosion or inundation property would be eligible for the Program. Landowners who contact DEP asking to be considered for the NYCFFBO are directed to the Outreach Lead for their municipality, and if there is none, to the Town Supervisor or Mayor. Generalized flow charts of the

¹ Under the FEMA “three appraisal policy” adopted for the NYCFFBO, the City commissions the first appraisal and makes the purchase offer to the landowner, who has the option to commission a second appraisal at his or her own cost. If the value of that second appraisal is within 15% of the first appraisal, the second appraisal becomes the purchase price. If the second appraisal exceeds the first appraisal by more than 15%, the City commissions a third appraisal and the purchase price is determined by taking the middle of the three appraised values.

outreach and assessment process for the five program categories are provided in Attachment A at the end of this report.

Category 1 properties originating from LFAs are a key component of the NYCFFBO. Through the LFA, buyout properties may be identified through a collaborative, science-based process that seeks to improve community flood resilience. This process brings local leaders, community members, consulting engineers, SWCDs, CWC, Cornell Cooperative Extension, and DEP Stream Management Program staff together to review options for mitigating floods. DEP and SWCDs help to initiate the LFA process, select a consultant, and provide funding for the recommended solution. To date, seventeen LFAs have been completed in the West of Hudson watershed (see Figure 1). LFAs may result in one or more recommended flood hazard mitigation projects, some of which may require property buyouts and the relocation of a business or critical facility. Some LFAs contain recommendations indicating where buyouts of floodplain properties should be considered. DEP and SWCDs assist municipal boards with understanding and considering flood buyout options. Once the LFA is complete, the municipality decides whether to proceed with the implementation of some or all of its recommendations. For properties identified by an LFA, the municipality advances to a resolution supporting a buyout only after a property owner has indicated interest in considering an appraisal. A formal municipal resolution is required to initiate the DEP acquisition process.

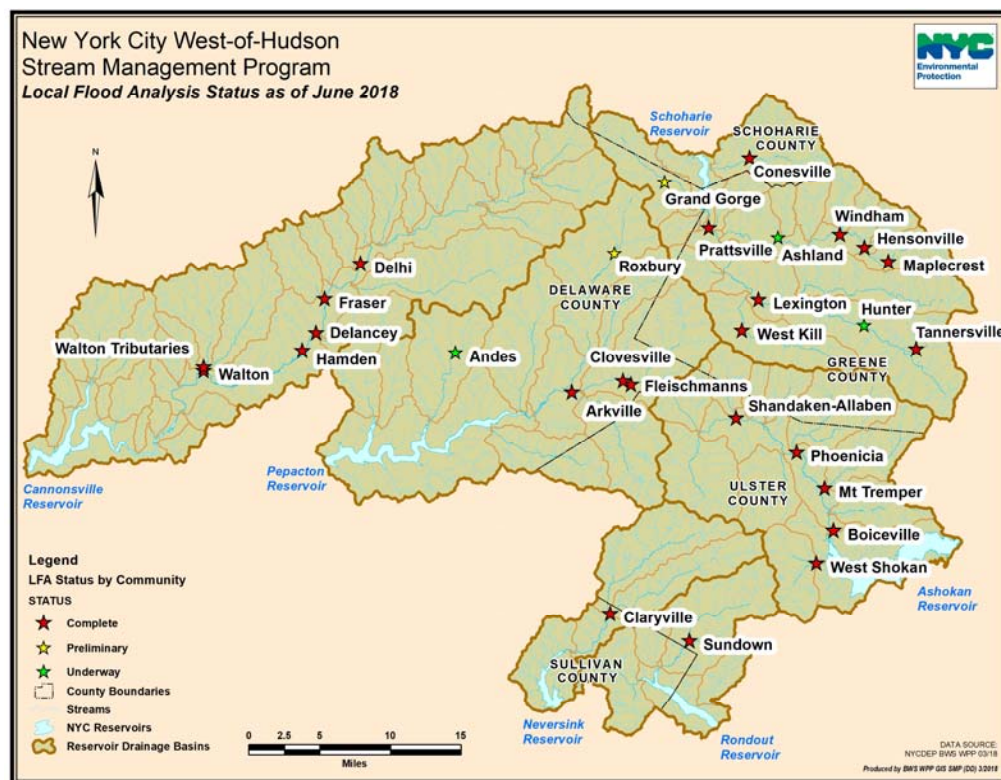


Figure 1: Location of Local Flood Analysis projects as of June 2018

4. Acquisition Process

Property identification is a collaborative process and begins with the municipality, assisted by the Outreach and Assessment Leads. If a municipality supports an application involving an erosion or inundation project, the Outreach Lead works with an Assessment Lead to ensure the property merits acquisition. Once it is determined that the property should be considered, the Outreach Lead works with the municipality to prepare a resolution and determine future ownership. If the municipality

passes a resolution of support, the Outreach Lead shares the information with the DEP Land Acquisition Program (LAP) and obtains landowner permission to access the property. Only after a landowner has signaled their interest and the property is covered by a municipal resolution does the Outreach Lead and/or the municipality transfer the project to the LAP.

The NYCFFBO acquisition process is similar to the core LAP, which involves agreement between a willing seller and a willing buyer, with confidentiality of information applying to value. If the appraisal process results in an accepted offer, the seller signs a purchase contract, either directly with the City, or for properties to be acquired by municipalities, a three-party contract with the City and municipality. The City worked closely with Delaware County and the Coalition of Watershed Towns (CWT) to create a model three-party contract (Landowner-Municipality-City) specifying each party's rights, obligations and tasks leading up to a closing paid for by the City, with title granted to the local municipality. DEP is responsible for pre-closing due diligence (title, environmental testing and survey) prior to closing. For properties to be owned by a municipality, due diligence documents and issues are shared and/or resolved through close consultation between DEP and local officials.

Any structures on a property to be acquired through the NYCFFBO are demolished after closing, a process managed through CWC's Flood Hazard Mitigation Implementation Program. CWC has hired an engineering firm to draft Demolition and Safe Work Plans for each property based on a process developed by DEP, and CWC works with DEP to review demolition plans and bid specifications for removal of structures. CWC solicits and bids out the demolition work and supervises demolitions. DEP works closely with CWC to ensure environmental compliance throughout the demolition process.

5. Program Status and Metrics

Following the development of the Program in mid-2016, the NYCFFBO signed its first contract in November 2016 and had the first closing in September 2017.

Acquisition Status: As of June 2018, the following list summarizes the number of properties at key stages of the acquisition process through the first two years of program activity:

<u>Acquisition Stage</u>	<u># of Properties</u>
Properties with Town resolutions:	33
Appraisals Ordered:	22
Offers Accepted:	16
Offers Refused:	2
Offer/Appraisal Pending:	4
Contracts Executed:	5
Closed:	2
Demolition Completed:	1

Eleven properties with approved town resolutions are still in the pre-appraisal process. Most of these are expected to go to appraisal in 2018 pending confirmation of eligibility and landowner concurrence. In addition, of the 16 properties with accepted offers, five are in contract. The remaining eleven are anticipated to be in contract at some point during 2018. Depicting the above milestones graphically by year (see Figure 2) shows the rapid acceleration of program activity during 2017-2018:

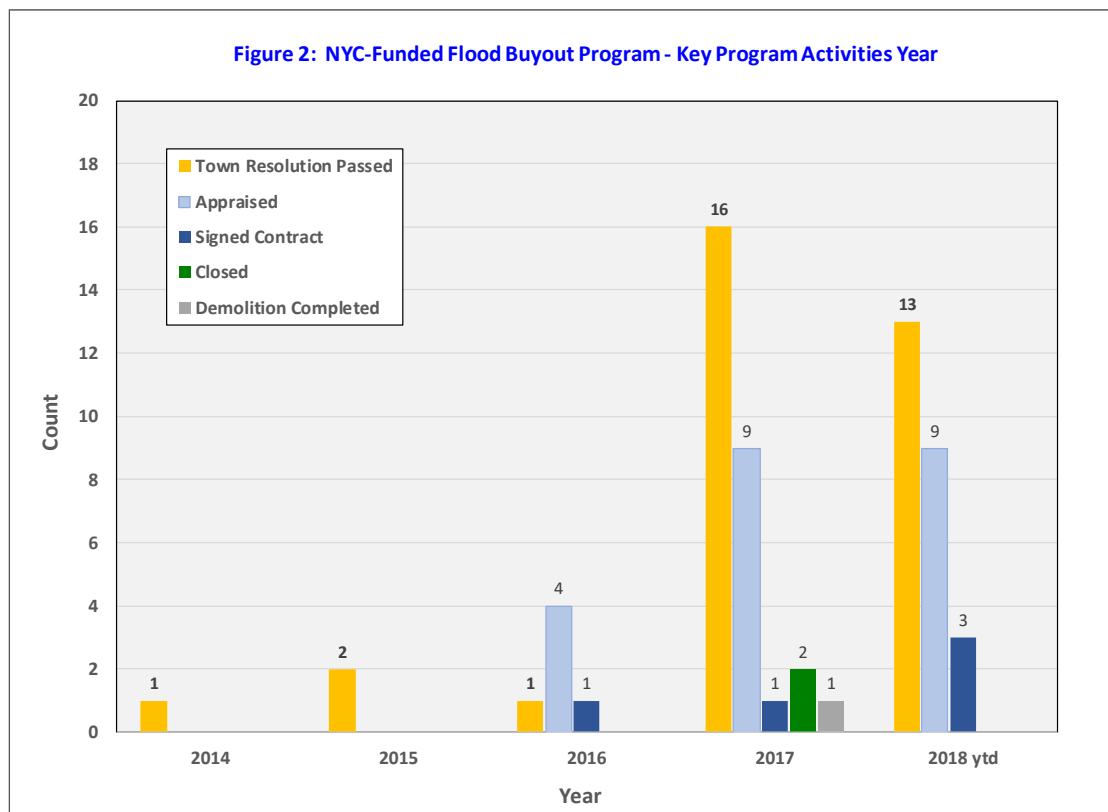


Table 1 below provides details of Program activity by County, Town and FBO Category for all 33 projects with municipal resolutions:

Table 1: NYCFFBO Properties with Town Resolutions by Municipality and FBO Category

County	Town	FBO Category	Resolutions Passed	Offer Accepted Projects		
				Count	Future Owner	Types of Property
Ulster	Olive	LFA	6	5	3 Town, 2 City	2 Residences, 3 Commercial
	Shandaken	LFA	10	3	1 Town, 2 City	3 Residences
	Conesville	LFA	2	1	Town	Residence
		Stream	2	2	1 Town, 1 City	1 Residence 1 Vacant Land
Greene	Hunter	Erosion	2	2	City	2 Residences
		LFA	5	n.a.	n.a.	n.a.
	Jewett	Erosion	1	1	City	Residence
	Windham	LFA	2	1	Town	Commercial
Delaware	Walton	LFA	2	1	Town	Commercial
	Middletown	LFA	1	n.a.	n.a.	n.a.

Program Activity by Category: As shown in Table 1, most NYCFFBO projects have resulted from the LFA process. There have been LFA resolutions for 28 properties in the Towns of Shandaken (10), Olive (6), Hunter/Village of Tannersville (5), Conesville (2), Windham (2), Walton (2), and Middletown (1). The LFA may result in recommendations for multiple projects that are implemented over time, so additional buyout resolutions are possible in these communities. Some municipalities have completed LFAs without recommending projects for the NYCFFBO, while other municipalities are still in the middle of an LFA process that may result in designation of properties for the Program (see Figure 1). This level of LFA activity shows that having the NYCFFBO option available provides a valuable tool in some municipalities, allowing them to implement projects or policies to improve flood resilience in hamlet areas. Other municipalities are continuing discussion over the merits of flood buyouts and may consider NYCFFBO in the future, potentially in combination with other flood hazard mitigation strategies such as elevations or flood proofing.

In addition to LFA projects, towns have approved an additional five properties for the NYCFFBO, including two in Category 3 (Stream Projects) and three in Category 4 (Erosion Projects). The three erosion hazard projects are all outside of LFA areas; in those cases, interested landowners contacted their municipalities requesting to be included in the NYCFFBO, and the Assessment Leads coordinated an engineering study through CWC to verify their eligibility. To date, there have been no resolutions passed for specific Category 5 Inundation Projects, although many LFA resolutions have been for repetitive loss properties in hamlet areas, rather than for buyouts directly associated with mitigation projects such as floodplain restoration.

Appraisal Process and Acceptance Rate: The appraisal process described in Section 3 is working effectively. Of the 16 accepted offers, three landowners chose to commission their own (second) appraisal, and the purchase price for those projects will be based on the second appraisal. The remaining 13 landowners accepted the City's offer based on the first appraisal. As could be expected from a program that offers to relieve landowners of their improved properties in flood-prone areas at fair market value, the data show a high acceptance rate. Of the 18 offers made to date, 16 (89%) have been accepted. The two offers marked as "refused" expired due to relocation issues, which as described in Section 7 pose complex choices for prospective sellers. The high acceptance rate for the NYCFFBO is comparable to the City's experience with the FEMA Program.

Contract and Closing Process: As with any new program, especially one that involves close coordination between City, local and State government, there have been some delays associated with the development of model program documents such as the three-party purchase contract for properties planned for municipal ownership and development of the conservation easement for those properties (see Section 7 below). The three-party purchase contract was finalized in early 2018, and two properties are now in contract using that model. As new municipalities choose to enter the program, they need time to review and approve this contract for their use.

Once NYCFFBO projects are under contract, they have generally been processed in timeframes consistent with or faster than the pace of core LAP acquisitions. The first two closed projects went from contract signing to closing in about 10 months, which is faster than typical LAP projects. While this pace may not be sustainable once a larger volume of NYCFFBO projects are in the contract phase simultaneously, DEP expects to continue closing NYCFFBO projects in a timely manner.

Municipal Opt-In: Participation in the NYCFFBO is driven by municipalities and DEP will not pursue projects unless they are proposed by the local town and the landowner is a willing seller and DEP is a willing buyer (or facilitator for municipal ownership). To date, NYCFFBO projects have

been the result of property-specific town resolutions. In one case, the Town of Shandaken has opted in for Categories 4 (Erosion) and 5 (Inundation) but no projects in those categories have yet to result from that designation. Despite this lack of town-wide opt-in, the demonstrated level of interest in the Program has been significant (33 resolutions in less than two years), primarily due to the relatively high number of projects generated by LFAs that have already been approved. However, LFAs are finite in number and scope, and once those projects are complete, DEP expects a reduction in new projects moving into Program. Interest in buyout programs may increase immediately following a flood event and that interest would be sustained for about three to four years following the flood event, whether the available funds derive from FEMA or DEP.

Program Funding: The 16 properties with accepted offers were appraised for a total of \$3.89 million or an average of \$242,625 per property. Most properties have been valued between \$50,000 and \$300,000. Soft costs (survey, title and environmental site assessment) are projected to comprise an additional 10% of the purchase price, resulting in a projected total acquisition cost for these 16 projects of \$4.27 million. That works out to about \$270,000 per project, assuming a \$245,000 average purchase price. Demolition costs for the NYCFFBO are being covered by CWC using funds provided by the City.

At this rate of expenditure, the \$15 million of existing Program funding would cover approximately 40 additional projects, or about eight per year for five years. DEP believes that while the pace of NYCFFBO projects will moderate in the coming years as LFAs are completed, the level of Program funding merits monitoring. DEP will discuss this topic with the FAD regulators during its annual budget discussion, and will further assess program expenditures in our 2021 evaluation report.

6. Case Studies

Four case studies are presented below, highlighting examples of NYCFFBO projects identified through the LFA process for flood hazard mitigation (Walton and Shandaken), two communities where LFAs identified multiple buyouts for inclusion in the program (Shandaken and Olive), and an erosion hazard project with an imminent threat of failure (Jewett).

Town of Walton, Delaware County

The Walton LFA recommended a project to lower flood elevations on Delaware Street in the Village of Walton, requiring the purchase and demolition of a commercial property (auto dealership) situated within a few feet of the stream. Upon demolition of the improvements, the floodplain will be excavated to improve the conveyance of floodwaters and help reduce the frequency of flooding on Delaware Street. DEP and the Town of Walton currently have a contract for sale with the business owner who has announced plans to relocate his auto repair operations to another site in the Village. The Town of Walton will take ownership of the property and work with Delaware County SWCD on the floodplain restoration project.

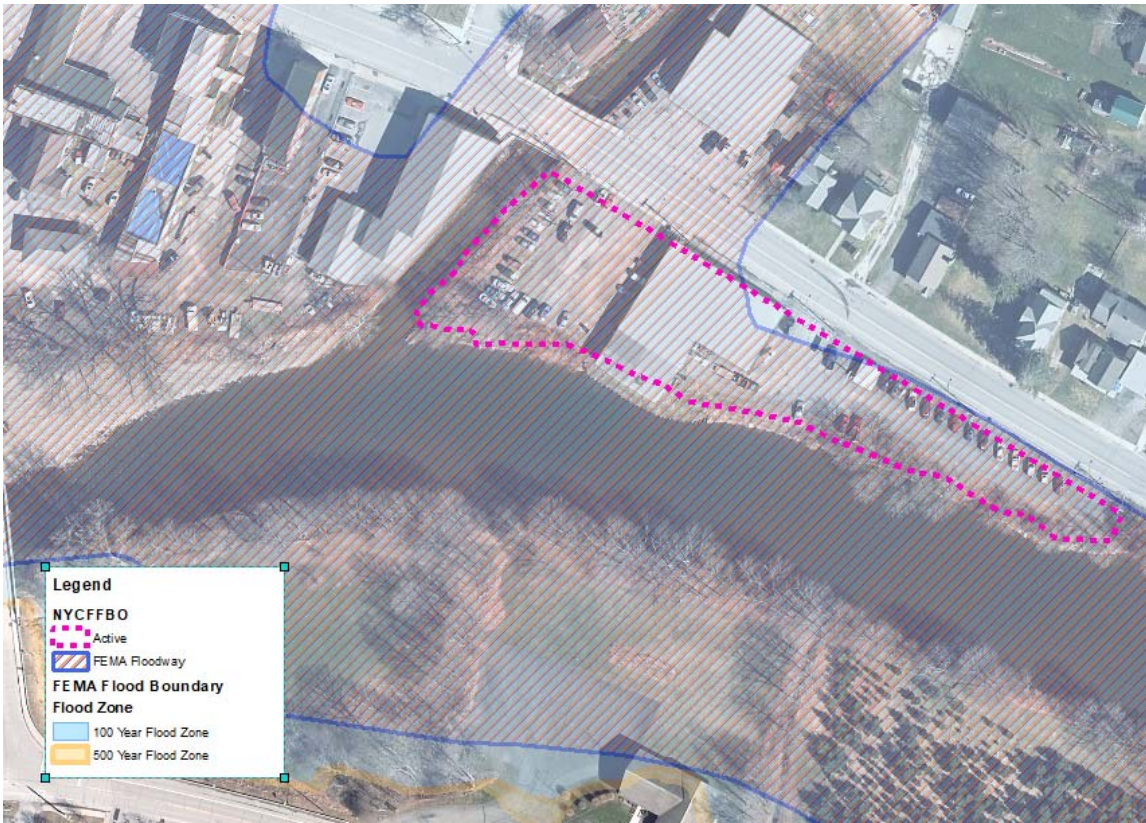


Figure 3: Auto dealership site at the confluence of East Brook and the West Branch Delaware River.



Figure 4: West Branch Delaware flooding at Walton LFA auto dealership site.

Town of Shandaken, Ulster County

DEP is working with the New York State Department of Transportation, Ulster County, and the U.S. Army Corps of Engineers on a bridge replacement, levee removal and floodplain restoration project in the Hamlet of Mount Tremper where six property buyouts are needed. The project will lower flood elevation on a number of properties upstream of the bridge and ensure that a major transportation artery (NYS Route 28) can remain open through flood events.

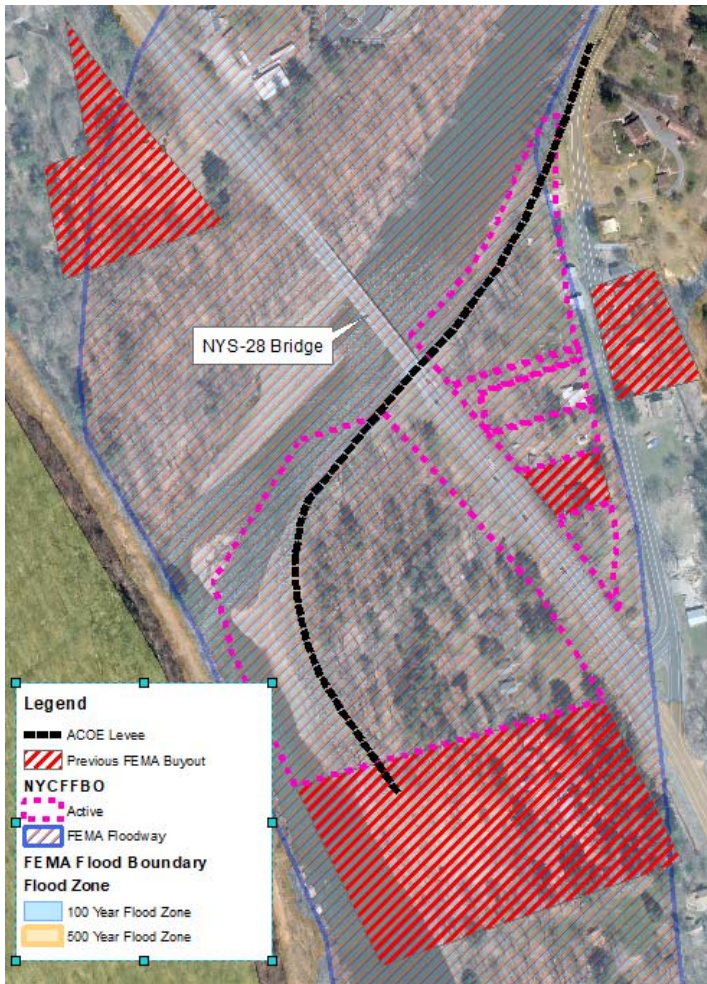


Figure 5: Mt Tremper active and FEMA buyout properties.

Town of Olive, Ulster County

In the Hamlet of Boiceville, the Town of Olive LFA recommended and the municipality passed resolutions to allow six inundation properties to enter the NYCFFBO. The Town is also working with DEP and CWC to relocate the Boiceville firehouse and is commencing a planning effort funded by CWC to identify land outside of floodplains, yet still in the hamlet, for future commercial development.



Figure 6: Active NYCFFBO properties in Boiceville, Ulster County.

Town of Jewett, Greene County

In 2014, the Town of Jewett approved a resolution to allow an erosion hazard property to enter the NYCFFBO, with Greene County SWCD serving as the Outreach and Assessment Lead. The residential structure, located on a high bank along the East Kill, was determined to be in imminent danger of collapse. Once the 2016 WSP modification was granted, DEP worked quickly with the property owner to enter contract and closed on the property in August 2017. CWC worked with its subcontractor and DEP to develop a demolition plan and complete demolition in October 2017, successfully ensuring that the structure never fell from the eroded escarpment into the stream.



Figure 7: Residential structure in the Town of Jewett hanging over a failed stream slope.

7. Review of Program Challenges

Overall, as detailed in Section 5, the NYCFFBO has had a successful rollout and implementation since 2014. Several program areas are worthy of detailed review below based on experience date or because they were subject of significant discussion among watershed stakeholders during program development:

Property Ownership: DEP encourages municipalities to own properties acquired under the NYCFFBO, since the local government is in the best position to manage properties, particularly those in populated hamlet areas. The municipality is also the preferred owner for acquisitions having flood mitigation projects, since construction and ongoing management of those sites is under local government control. Program policy to encourage municipalities to identify their preference for future ownership of the property early on in the process has largely succeeded. For municipally-owned properties, the municipality may draft a Re-Use Plan that identifies future uses such as recreation, town events or trails. Future uses on City-owned properties are managed through the DEP Land Use Permit process. For both City and municipally-owned properties, the owner is required (pursuant to the MOA and WSP) to grant a conservation easement to the New York State Department of Environmental Conservation (NYSDEC). Currently, 21 projects are planned for municipal ownership, which is positive evidence that this component of the Program is acceptable to watershed communities. The remaining projects that are expected to be City-owned are either adjacent to City lands or outside of hamlet areas.

A unique feature of the NYCFFBO is that the municipality, on properties they acquire under the Program, has the option to use lands outside of the 100-year floodplain (“Upland Portion”) for development purposes in the future. These lands will not be subject to the NYSDEC easement and may be developed by the municipality or another public/private entity upon conveyance. Unless and until the Upland Portion is subdivided or used, it must be treated in accordance with the Re-Use Plan or, in the absence of a Re-Use Plan, as if it were subject to the terms of the NYSDEC easement on the remainder of the parcel. To date, only one property has been identified for municipal ownership with an upland area, and in that case, the municipality is planning to use the entire site as a public park.

Conservation Easement to NYSDEC: The 2016 Side Agreement requires that local municipalities who take title to land under the NYCFFBO grant a conservation easement to the NYSDEC at closing. The CWT and Delaware County are working with the NYSDEC to draft an easement for this purpose. The City has reviewed the draft easement and offered comments, but is not an active party in negotiating final language of the NYSDEC easement. Delays in finalizing the easement could delay closings on properties to be held by local municipalities; to avoid this, DEP has proposed to CWT and NYSDEC that the local municipality file a Declaration of Covenants, Conditions and Restrictions at closing to uphold the terms of the 2016 Side Agreement until an easement is filed.

Long-term stewardship: NYCFFBO properties present long-term stewardship challenges for DEP that are somewhat different than parcels acquired through the core LAP. For the most part, these properties are small and isolated from other City-owned properties, with many having private or commercial neighbors that are more likely to involve encroachments in the future. All NYCFFBO properties owned by the City will be maintained and inspected consistent with DEP’s Fee Land Monitoring Policy and all property boundary lines will be clearly marked and posted.

City ownership of properties acquired under the NYCFFBO will allow for more direct and efficient implementation of future stream projects. DEP will also open most of these properties to recreational

uses such as fishing and hiking. To date, the City has acquired two properties under the NYCFFBO, one of which is already open for recreation. Any activities that are undertaken by DEP on the property must be consistent with the conservation easement granted to the NYSDEC. In certain cases where a qualified partner wishes to propose low-impact activities that are consistent with the NYSDEC easement, DEP will consider issuing a revocable land use permit.

Demolition and Cleanup: As discussed above, demolition and site restoration of properties acquired under the NYCFFBO is being conducted by CWC. To date one demolition has been completed on a City-acquired property, and CWC and DEP worked together to fulfill all environmental health and safety requirements at this site. Several active projects will involve demolition of commercial structures, and these properties often require substantially higher cleanup costs and longer timeframes than most residential properties. As the first closings occur on locally-owned properties, municipalities will need to work closely with CWC to prepare demolition plans and supervise operations.

Relocations: The process of relocating commercial businesses and critical facilities proposed for the NYCFFBO to new sites in the same town is important to many prospective sellers and municipalities. As expected, this process has been slow and complex. Through its Flood Hazard Mitigation Implementation Program, CWC can acquire property planned for relocation of the existing business or facility. In practice, the cost of constructing a new replacement facility appears to present a financial hurdle which business owners and municipalities have not yet been able to address. For the three properties that DEP has appraised where the owners plan to relocate, only one has gone to contract and there is no replacement property secured as of yet. Relocating businesses is a long-term process because property owners have to address moving plans and expenses, decide how to efficiently close one business location and open another in timely fashion, and arrange for design and construction of new facilities – all before making the commitment to sell the existing property. DEP will continue working through these challenges with CWC and municipalities.

LFA buyout recommendations and landowner confidentiality: During the LFA process, the review of flood-damaged properties as part of the benefit cost analysis results in estimated costs of losses for floodplain structures. This property damage information is reviewed by municipal Flood Advisory Committees as they considered mitigation alternatives. Ultimately, most committees decided not to publish the information or make property-specific recommendations for properties to enter into the NYCFFBO because the committees felt that the LFA document could compromise property values if an owner chose not to enter the program. As a result, most LFAs make a general recommendation to buy floodplain properties where the municipality and landowner express an interest in this option. For administrators of the NYCFFBO, this makes it difficult to determine whether a property should qualify for the program based on relative cost of expected damages.

8. Conclusion and Recommendations

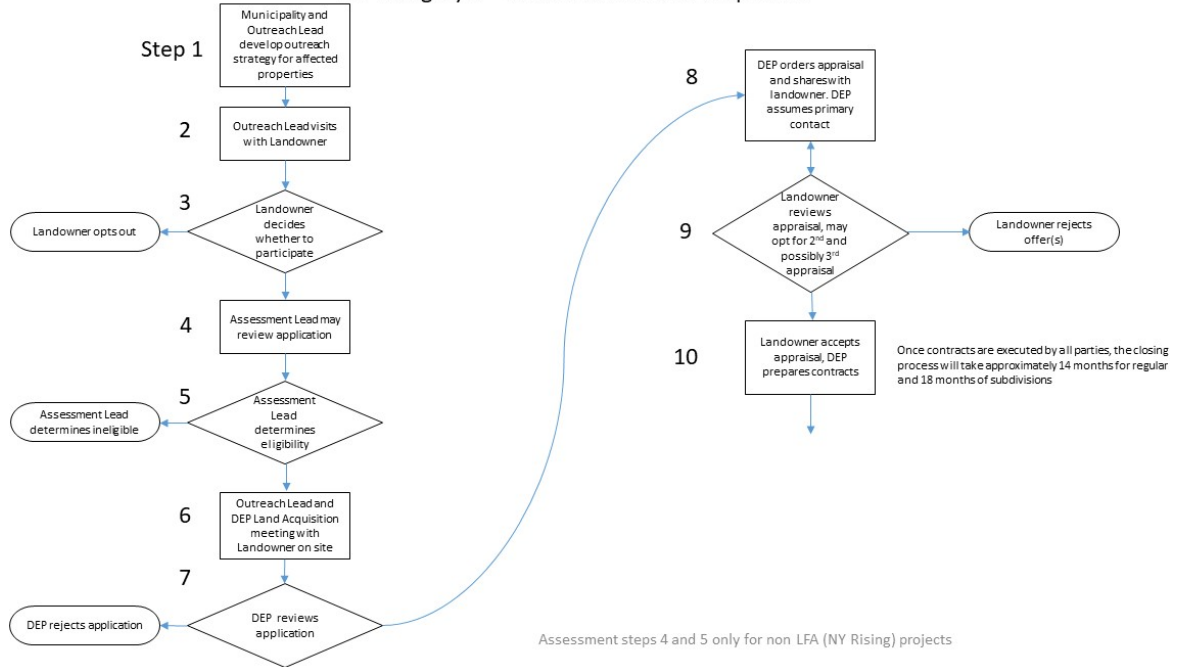
In summary, DEP believes that the NYCFFBO can be deemed successful by several measures. Considerable ramp-up time was invested in developing the Program and the associated Process Document with numerous stakeholders, and buyouts are completed or underway in eight watershed towns across three counties. Where consensus exists, NYCFFBO allows communities to implement their vision for improved flood resilience with a high degree of local control, while the costs and expertise associated with real estate acquisition and demolition are fully covered by DEP.

Several areas have been identified as issues of concern, including relocation and municipal opt in. DEP is committed to working with its partners including local officials, CWC and the FAD regulators

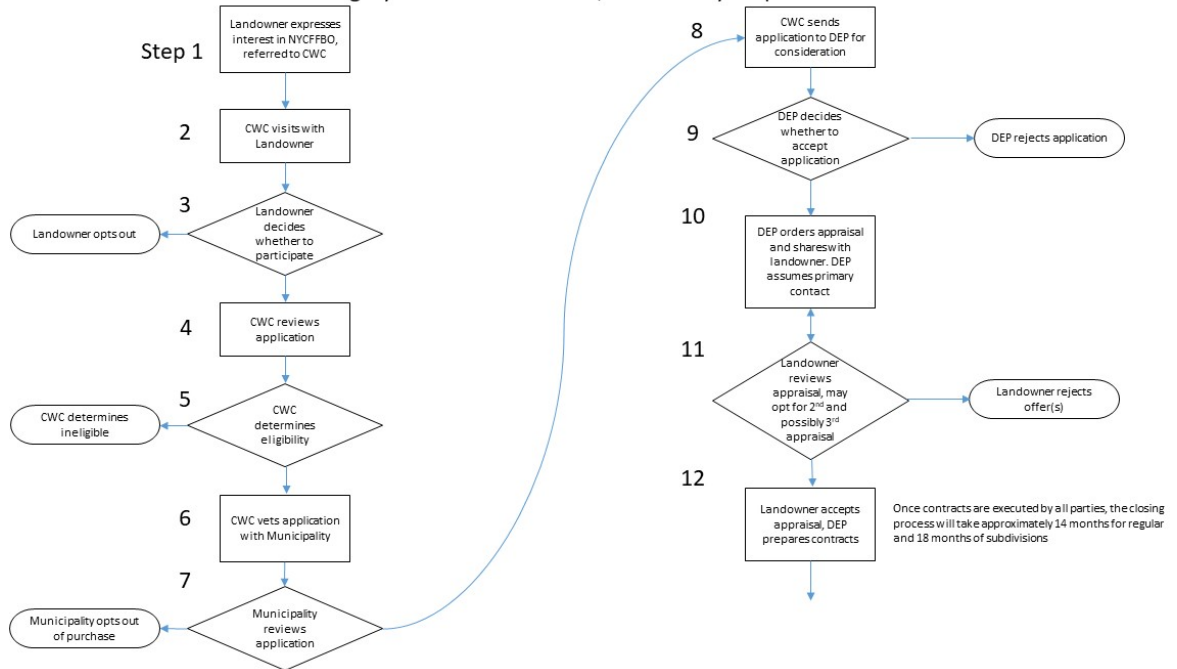
to identify opportunities to increase understanding of and participation in the full the range of flood hazard mitigation programs available to watershed communities. As the NYCFFBO enters its third year of active project implementation, the City will seek to improve program efficiency and communication with local stakeholders. The next evaluation report is due in June 2021.

Attachment A: Process Flow Charts for NYCFFBO Categories 1 through 5

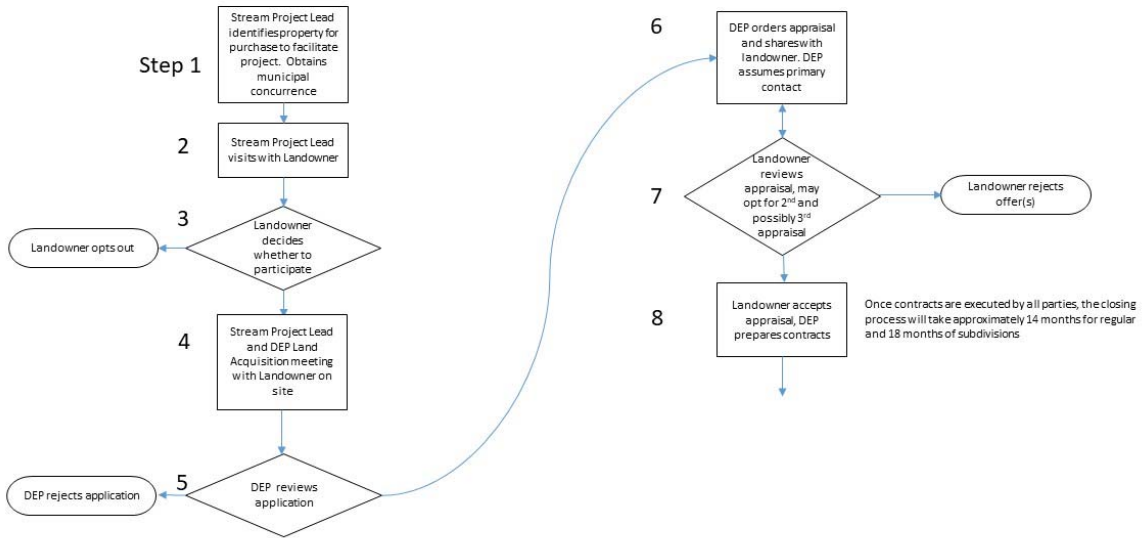
Generalized Flow chart of NYCFFBO Outreach and Assessment Process
For Category 1 – LFA Recommended Properties



Generalized Flow chart of NYCFFBO Outreach and Assessment Process
For Category 2 – Anchor Business, Crit. Facility Properties



**Generalized Flow chart of NYCFBBO Outreach and Assessment Process
For Category 3 – Stream Project Properties**



**Generalized Flow chart of NYCFBBO Outreach and Assessment Process
Category 4 Erosion and Category 5 Inundation Properties**

