

# **8-Step Floodplain Analysis**

## **County of San Mateo – 1580 Maple Street**

### **Step 1: Determination of Floodplain**

The 1580 Maple Street project is situated on a 1.5-acre parcel located at 1580 Maple Street (APN: 052-532-020) in Redwood City, San Mateo County, California, 94063. The project is adjacent to U.S. Highway 101 (U.S. 101) to the south; the Redwood City Police Department to the east; and the 1548 Maple Street Project to the north and west, which will develop 131 market rate townhomes. The Maple Street Correctional Center and San Mateo County Navigation Center are located further east of the project site at the intersection of Blomquist Street and Maple Street. The site is zoned Tidal Plain, and the General Plan Designation is Mixed-Use Waterfront. The site is relatively flat and has elevations that range from approximately 7 to 11 (NAVD88). The site area in the floodplain is currently developed with two vacant single-story commercial buildings totaling 22,000 square feet and a surface parking lot. The existing on-site buildings and parking lot would be demolished as part of the adjacent 1548 Maple Street project.

The proposed project would construct an approximately 50,939 square foot modular residential building and up to 79 surface level parking spaces for 108 extremely low-income households and 2 resident managers. The unit mix is 108 studios, and 2 two-bedroom manager units. In addition, the project will construct a single-story community building that will be approximately 1,500 square feet. The proposed project will also provide approximately 7,980 square feet of open space consisting of a central courtyard, dog run, communal dining areas, gardening space and a quiet area. The entire proposed project site is located in an area that will be elevated by fill outside of the floodplain.

The project site is in Federal Emergency Management Agency Flood Zone AE, based on Flood Insurance Rate Map No. 06081C0301F, effective April 5, 2019. The Zone AE designation is a Special Flood Hazard Area subject to inundation by the 1-percent annual-chance flood event (also known as a 100-year flood) with an established base flood elevation. The base flood elevation of the project site is elevation 10 feet. A Conditional Letter of Map Revision based on Fill (CLOMR-F) is to be submitted to FEMA to confirm that the entire project site, once elevated, will be above the 100-year base flood elevation (BFE) of 10 feet, NAVD88. The area to be removed will be provided as a metes and bounds description to be submitted with the CLOMR-F. The lowest lot elevation within the metes and bounds area will be no less than two feet above the BFE. If the CLOMR-F process continues to be suspended by FEMA, the project will still proceed with elevating the site by fill according to the specifications above and will purchase flood insurance.

### **Step 2: Early Public Review**

A Preliminary Public Notice for Potential Impacts to Floodplains was published in the San Mateo Daily Journal newspaper on June 21, 2023 in order to facilitate early public review of the proposed project and inform the public that the project site is located in a floodplain. The ad targeted local residents, including those in the floodplain. The notice was also sent to interested persons, agencies, and organizations in the Redwood City area of San Mateo County in addition to Federal, State, and local agencies. A list of specific agencies and individuals, an affidavit of publication for the public notice, and a receipt of publication are attached. No comments were received during the 15-day public comment period following publication.

### **Step 3: Identify and Evaluate Practicable Alternatives**

The project is the new construction of a 110-unit permanent supportive housing project to be built on a site located in Flood Zone AE. There are four alternatives to construction of the project in its planned location in the floodplain: 1) Alternative 1 – abandoning this project site and building the project on another site in the City of Redwood City (“Redwood City” or, the “City”), if one of adequate size can be located; 2) Alternative 2 – abandoning this project and project site and proposing the same or similar project at another site that is outside the City but is not in a floodplain; 3) Alternative 3 – Build project in the current location

in the floodplain, but build a levee/seawall to protect the site, and; 4) Alternative 4 - the No-Action Alternative – abandoning the project entirely and not proceeding with construction of the project at any location.

Alternative 1 – Abandoning this project site and building the project on another site in Redwood City that is not in a floodplain. There are no properties of adequate (greater than 1.5 acres) or appropriate (less than 5 acres) size or properly zoned for sale in the City that are outside of the floodplain (0 properties available). Any existing undeveloped lots within Redwood City are smaller lots than what is required for the project.

In looking at sites with existing improvements in Redwood City and the surrounding area within San Mateo County limits, there are approximately 14 sites for sale under 1.5 acres and 5 sites over 5 acres. The only sites for sale within San Mateo County of appropriate size and zoning are the following:

- 1.70 Acres located at 150 Charter St, Redwood City, CA approximately 1.17 miles from the project site.
  - The listing for the site is \$34 million which would effectively make the project infeasible.
- 1.79 Acres located at 800 Laurel Ave in Belmont, CA approximately 3.65 miles from the project site.
  - The City of Belmont has tentatively approved development of 16 townhomes, making this site unavailable.
- 2.83 Acres of “land” located at 1001 Woodside Rd. in Redwood City, CA approximately 2.11 miles from the project site.
  - The listing states that the land is available for redevelopment and that there are 57 existing multifamily units on the property.
  - Redeveloping the site for permanent supportive housing would cause the displacement of existing residents. Costs for relocating tenants in these 57 existing multifamily units would effectively make the project infeasible.

Due to there being no undeveloped sites of appropriate size in the City that are zoned for development of the project, available for development and financially feasible, Alternative 1 was determined to not be a practicable alternative to construction of the project at the currently proposed site.

Alternative 2 – Abandoning this project and project site and proposing the same or a similar project at another site outside the City that is not in a floodplain. Although it may be possible to find another site outside of the City that is outside of a floodplain to build the project, doing so will fail to address the significant need for quality permanent supportive housing in the City of Redwood City since there are no practicable sites within or in the immediate vicinity of the City as discussed above under Alternative 1. The San Mateo County One Day Homeless Count and Survey (PIT) reported 1,092 people experiencing unsheltered homelessness, of which 22% are in Redwood City.<sup>1</sup> Abandoning this project site and seeking another site elsewhere outside of the City fails to address the significant need for quality permanent supportive housing within the City of Redwood City. Further, even if such a site could be found, the cost of purchasing an undeveloped, adequate-sized, and appropriately zoned site from a private seller would make the project infeasible. Therefore, Alternative 2 was determined to not be a practicable alternative to construction of the project at its current proposed location.

Alternative 3 - Build project in the current location in the floodplain but build a levee/seawall to protect the site. Although it may be possible to build a levee/seawall, this alternative was found to be infeasible because it would divide our development from the neighboring 1548 Maple townhomes development. The City has decided to raise the surrounding areas and have already made the determination that doing so would not impact the community. Adding a levee would not be consistent with the mitigation methods of the surrounding sites.

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<sup>1</sup> County of San Mateo Human Services Agency. (2022, August). *smc.gov.org*. Retrieved August 30, 2023, from 2022 One Day Homeless Count: <https://www.smcgov.org/media/133851/download?inline=>

Alternative 4 - the No-Action Alternative. This alternative, of complete abandonment of the project, was considered but would leave the City with a significant and overriding need for quality affordable housing and, therefore, is not considered a practicable alternative. The No-Action Alternative was not considered a viable or practicable alternative.

#### **Step 4: Potential Direct & Indirect Impacts of the Proposed Project on the Floodplain**

The project involves construction of two (2) buildings, one containing 110-units of permanent supportive housing and the second, an approximately 1,500 square foot community building that will be built on a site that is located in a floodplain. A Conditional Letter of Map Revision based on Fill (CLOMR-F) is to be submitted to FEMA to confirm the property, once elevated, will be above the 100-year base flood elevation (BFE) of 10 feet, NAVD 88. The area to be removed will be provided as a metes and bounds description to be submitted with the CLOMR-F. The lowest lot elevation within the metes and bounds area will be elevated a minimum of two feet above the BFE. FEMA will review the application and provide a determination regarding the flood hazard zone. If FEMA finds the metes and bounds area is proposed to be sufficiently elevated, we expect the area to be conditionally designated as Zone X. The CLOMR-F **does not** change the FEMA map or flood zone designation. Its intent is for confirmation that FEMA agrees the proposed project will be elevated and removed from the Zone AE floodplain if built according to the plans submitted to FEMA.

If the CLOMR-F process continues to be suspended by FEMA, the project will still proceed with elevating the site by fill above the 100-year base flood elevation and will purchase flood insurance.

Construction of the project at the proposed location, which would be the preferred alternative, and the No-Action Alternative would result in no net reduction or expansion of the floodplain.

#### **Step 5: Opportunities to Minimize, Restore, & Preserve**

Substantial modifications of the project have been identified as not practicable. Project modifications would likely create a greater impact on the floodplain by increasing the number of buildings or the footprints of the planned buildings, thereby, increasing the potential impact on the floodplain.

Developer will obtain flood insurance protection against potential loss due to damage from flooding as required under the National Flood Insurance Program and otherwise comply with the regulations of the Federal Emergency Management Agency (FEMA) found in 44 CFR Part 59-77; said insurance would remain in effect until the site is removed from the floodplain.

#### **Step 6: Reevaluate the Proposed Action**

Reevaluation of the alternatives confirms that there is no practicable alternative to construction of the project on the proposed site due to the lack of suitable alternative sites in Redwood City and the immediate surrounding area. There is a significant lack of permanent supportive housing in the City of Redwood City making it impractical to move the project to another area as that would not address the current need.

Due to lack of other practicable alternative sites in the City of Redwood City, the proposed project is the best site currently available for the project. The project is conveniently located near many services that will be utilized by residents.

#### **Step 7: Determination of No Practicable Alternative**

There are few benefits to the human environment to be obtained by not developing the project as proposed. The proposed project will meet a small portion of the significant need for permanent supportive housing in the Redwood City area and the wider San Mateo County area. This project is part of the County of San Mateo's Functional Zero goal to end homelessness for county residents. The project will improve the overall quality of living for area residents by providing much needed high-quality permanent supportive housing and supportive services for the formerly unhoused population, in addition to improving the

aesthetics of the neighborhood. Tenant referrals are anticipated from the newly built County Navigation Center which replaced the LifeMoves homeless shelter previously located on the project site. Tenant referrals are also anticipated from the City of Redwood City through a preference for the Redwood City unhoused population.

The County has therefore determined that there is no practicable alternative to building the project in its proposed location.

### **Step 8: Implement the Proposed Action**

The project will be implemented as proposed, and the Developer will purchase and maintain flood insurance as needed due to the development project site being located in the floodplain.