

# **8-Step Floodplain Analysis**

## **City of Santa Cruz – Downtown Library Affordable Housing Project/Downtown Library Mixed Use Redevelopment**

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

The Downtown Library Affordable Housing Project/Downtown Library Mixed Use redevelopment project is to be situated on two parcels totaling approximately 1.54 acres located at 113 and 119 Lincoln Street in the City of Santa Cruz, Santa Cruz County, California (APNs:005-141-11, 005-141-21). The project site is located in downtown Santa Cruz in the Downtown Plan area bounded by Lincoln Street on the north, Cedar Street on the west, Cathart Street on the south and commercial buildings to the east fronting Pacific Street. Surrounding site uses include commercial buildings to the east, commercial and a parking lot to the north across Lincoln Street, Calvary Episcopal Church and a mixed-use commercial and affordable housing project to the west across Cedar Street and commercial buildings to the south across Cathart Street. One of the two parcels is a city parking lot. The site is zoned CBD/FP-O (Central Business District, Floodplain Overlay) and is consistent with the City of Santa Cruz Downtown Specific Plan. The site has a USDA NRCS slope rating of “1,” representing a relatively level site with negligible slope. The site area is in the downtown area of Santa Cruz and has been previously developed with a parking lot and one commercial structure. The project will include the demolition of the existing flood susceptible structure.

The Downtown Library Affordable Housing project will consist of one 96’ high eight-story building with the first three floors utilizing Type 1A construction and the top five floors utilizing Type 3A construction. The first floor of the building will contain the lobby and 1,333 square feet of space for a daycare, and the fourth floor the leasing/management and resident services offices, lounge, community room, computer room, and laundry room. One hundred and twenty-four (124) studio, one, two, and three-bedroom units will be dispersed throughout floors four through eight, along with several outdoor courtyard and child play areas. Except for one manager’s unit, all units will be LIHTC-restricted to households earning at or below 30, 40, 50, and 60 percent of the AMI for Santa Cruz County. The structure is consistent with the Downtown Specific Plan and its goal of revitalizing the downtown area by replacing existing flood susceptible structures with floodproofed buildings. The project will be floodproofed to a minimum of at least 2 feet above BFE. Additionally, a LOMR has been submitted to FEMA for approval following construction of a new levee that proposes to remove the project site from the floodplain.

FIRM Map Number 06087C0332E, with an Effective Date of May 16, 2012, shows that the project site is located in Zone A99 – Special Flood Hazard Area Without Base Flood Elevation (BFE) determined. The U.S. Army Corp of Engineers (ACOE) issued a Notice of Completion for the San Lorenzo River Flood Risk Reduction Project on July 7, 2020 and the City has applied to FEMA to revise the flood zone designation which, if approved, would remove the site from the floodplain. The application with FEMA is still pending at this time.

The project site is also in the FFRMS floodplain per the FFRMS Freeboard Value Approach Report for the site.

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

A Preliminary Public Notice for Potential Impacts to Floodplains was published in *The Santa Cruz Sentinel* newspaper on February 3, 2024, 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 target group for the notice included persons, agencies and organizations in the Santa Cruz area of Santa Cruz County. An affidavit of publication for the public notice is 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 254,275 SF mixed-use affordable, commercial and city library project containing 124 units of multifamily affordable housing to be built on a site currently located in Flood Zone A99. There are three 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 Santa Cruz, 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, and; 3) *Alternative 3* - the *No-Action Alternative* – abandoning the project entirely and not proceeding with construction of the project at any location.

*Alternative 1* – Alternative 1 was determined to not be a practicable alternative due to there being no undeveloped sites in the project area addressed by the Downtown Specific Plan with the size and zoning necessary for development of the project that were also located outside the floodplain.

*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. Alternative 2 was determined to not be a practicable alternative because abandoning this project site and area and seeking another site outside of the City located outside of the floodplain fails to address the significant need for quality affordable housing within the City of Santa Cruz.

*Alternative 3* - 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 a 8-story mixed-use building (96' height) containing commercial space, a new downtown library, public parking garage, daycare facility, resident mail room, bike room and utility spaces on the first floor and affordable housing units on floors 4-8 to be built on a site that is currently located in a floodplain. The project is part of the City of Santa Cruz Downtown Specific Plan to revitalize downtown Santa Cruz by replacing existing, flood susceptible buildings with floodproofed commercial and residential spaces. In addition to the residential spaces being elevated by their location on the upper floors of the building, the proposed construction will be floodproofed to at least 2 feet above the BFE, resulting in no net loss of floodway. Additionally, the project site is located in an area that is in the process of being redesignated due to the construction of a new levee and in the future will be out of the floodplain protected by levee.

As this will not impact the floodway, this will have an insignificant impact on the hydraulics of the floodway.

The preferred alternative, construction of the project at the proposed location, and the *No-Action Alternative* would both result in no net reduction or expansion of the floodway or 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 building and, thereby, increasing the potential impact on the floodplain.

The project owner 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 and said insurance will 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 the Santa Cruz area. There is a significant lack of affordable housing in the Santa Cruz area making it impractical to move the project to another area as that would not address the current need. Additionally, the proposed site is ideal for almost all other environmental concerns. It will replace a flood susceptible structure with a floodproofed building while its downtown location will put residents in closer proximity to shopping and jobs, and there is a new transportation hub being built, including the regional bus lines for the entire county, approximately 2 blocks to the southeast of the project. No other site from Step 3: Alternative 1 has these advantages.

Due to the lack of other practicable alternative sites in the City of Santa Cruz, and that the project will have no effect on the Effective Floodway, the proposed project is the best site currently available for the project.

### **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 affordable housing in the City of Santa Cruz. The project will improve the overall quality of living for area residents by providing much needed high-quality housing with affordable rents and lower monthly costs due to the energy saving features of the project as well as locating residents in close proximity to work, shopping, restaurants, and transit. The project will also improve the aesthetics of the neighborhood by removing older substandard buildings currently located on the site.

After reevaluating the proposed action and alternatives to the proposed action, the City has determined that there is no practicable alternative to locating the proposed project in the floodway. The reason for finding these alternative actions not practicable are discussed above in Step 3.

- *Alternative 1* – Abandoning this project site and building the project on another site in the City of Santa Cruz.
- *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.
- *Alternative 3 - The No-Action Alternative or Alternative Actions that Serve the Same Purpose* - The *No Action Alternative*, of not proceeding with the proposed project, would not address the City's significant and overriding need for affordable housing within the City.

A *Final Notice and Public Explanation of a Proposed Activity in a 100-Year Floodplain* was published in *The Santa Cruz Sentinel* newspaper in the City of Santa Cruz on February 29, 2024, containing the City's Determination of no practicable alternative for locating the project at the proposed site and the City's explanation for reaching this determination. The Notice is attached to this document. No concerns were expressed by the public concerning this Notice during the 7-day comment period.

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

As the City has determined that there is no practicable alternative to implementing the proposed project in the floodplain and the proposed project will have no impacts to the floodway and no increased impacts to the floodplain, the project will be implemented as proposed following best management practices during implementation. The City will assure that this plan, as described above, is executed and necessary language will be included in all agreements with participating parties. The City will also take an active role in monitoring the construction process to ensure no unnecessary impacts occur nor unnecessary risks are taken and that the floodplain continues to function with its preconstruction floodplain values.