# **FINE AND COARSE GRAIN BEACHES DESIGN STRATEGY REFINEMENT**

**DESCRIPTION.** Coarse or composite estuarine beaches are dynamic features that can consist of a mixture of sand, shell, gravel, or cobble. Beaches include a supratidal beach berm and a beach face. Gravel and cobble beaches can dissipate wave energy over shorter distances and are generally more suitable within the urbanized and constrained estuary. They can be placed in front of levees, roads or other vulnerable infrastructure to reduce erosion. Many beaches have habitat benefits to shorebirds.



SECTION: Mixed gravel beach, Public Sediment



## PROS

- Reduce erosion to landfill edges
- Reduce levee/berm maintenance adjacent to landfills
- Could enhance shorebird and beach habitat

\_\_\_\_\_

\_\_\_\_\_

## CONS

• May require artificial replenishment • Considered fill- permitting challenge \_\_\_\_\_





1.1

. .

. .

. .

. .

1 I.

1 I.

. .

1.1

1 1

1.1

1 1

. .

1 1

1.1

PROS

**PRECEDENT: Foster City shell hash beach** 

## PROS

• Reduce erosion of outboard marsh edges • Potential to lower maintenance of bayside levee/ berms

\_\_\_\_\_

\_\_\_\_\_

Reduced maintenance costs of outboard berms

## CONS

\_\_\_\_\_\_\_

• May require artificial replenishment

• Considered fill- permitting challenge

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

•

•





**PRECEDENT: Arambaru Island Enhancement Project** 



## • Reduce erosion to all outboard shoreline structures • Reduce erosion and maintenance costs of shoreline berms and levees

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

## CONS

• May require artificial replenishment- long-term cost • Could require a lot of material- high initial cost • Could require multiple groins to hold beaches between channels

- Considered fill- permitting challenge
- \_\_\_\_\_

# **TIDAL MARSH RESTORATION DESIGN STRATEGY REFINEMENT**

DESCRIPTION. Protecting, maintaining, and restoring tidal marshes and their associated mudflats is critical to maintain flood control and ecosystem services with climate change. Techniques include restoring diked baylands, planting native species to accelerate colonization, placing sediment to raise subsided areas, and creating high tide refugia within marshes. Existing marshes have the capacity to vertically accrete along with sea level rise if they have sufficient sediment supply. In low sediment scenarios, they may convert to mudflats or subtidal ecosystems.



## PROS

• Hayward marsh restoration is already planned

\_\_\_\_\_

## CONS

• If hayward marsh is restored as a muted marsh, it may not accrete as much sediment as a fully tidal system

\_\_\_\_\_





## PROS

. .

1 I.

. .

1 I.

• Marshes at bay edge may be able to accrete more sediment (from bay and fluvial sources)

## • Pair with fine sediment augmentation to adapt marshes with SLR

• Frank's east and west could help buffer landfill against erosion

## CONS

- Lose existing salt pond shorebird habitat- impacts endangered species habitat
  - \_\_\_\_\_
  - \_\_\_\_\_ \_\_\_\_\_
- PROS
- shoreline Increased habitat benefits • Larger tracts of connected marsh •

. .

1 1

1 1

1 1

. .

. .

1 1

## • Increased marsh buffer to reduce erosion and buffer

\_\_\_\_\_

## CONS

• Lose stormwater detention storage space • Removes oxidation ponds and uses

- Lose existing salt pond shorebird habitat- impacts endangered species habitat
- Lose Oro Loma sludge ponds
- \_\_\_\_\_

# **FINE SEDIMENT AUGMENTATION DESIGN STRATEGY REFINEMENT**

**DESCRIPTION.** The direct or indirect placement of fine sediments to increase mudflat elevation relative to the tides. This can help protect and sustain marshes, mudflats, and shorelines when sediment is low to help them accrete and keep pace with sea level rise. Techniques include water column seeding, nearshore placement, and thin layer placement.



**SECTION: Shallow Water Placement** Source: USACE Strategic Placement Report



## PROS

- Allow natural processes to facilitate accretion
- Prioritize large marsh adaptation to keep pace with
- SLR

## CONS

- Filling the bay is a regulatory challenge
- Does not help smaller marshes
- Hard to get material to the mudflat because it is so shallow
- Many unknowns about sediment transport and retention
- Potential negative impacts to existing habitat





**AXON: Mudflat Augmentation Strategies** Source: SFEI, Stantec

**PRECEDENT:** Seal Beach Sediment Augmentation Project, CA



## PROS

• Set up infrastructure for sediment delivery over time • Utilize upland sediment sources

\_\_\_\_\_

•

## CONS

- Filling the bay is a regulatory challenge
- Does not help smaller marshes
- Pipeline infrastructure could be costly
- Many unknowns about sediment transport and retention
- Potential negative impacts to existing habitat

SAN FRANCISCO BAY

## PROS

. .

1 1

1 1

. .

• Proactive approach to prep diked baylands for marsh restoration \_\_\_\_\_ \_\_\_\_\_

\_\_\_\_\_

**PRECEDENT: The Mud Motor, Netherlands** 



## CONS

- Spraying existing marshes disrupts endangered species habitat
- Many unknowns about sediment transport and retention

•

• Potential negative impacts to existing habitat • Power for pumping the sediment is very expensive

# **MARSH AND MUDFLAT MIGRATION PLANNING DESIGN STRATEGY REFINEMENT**

**DESCRIPTION.** Natural wetland-upland transition zones adjacent to present and potential marshes can be protected, enhanced, or restored to allow marshes to migrate landward as sea level rises. This can be paired with levee / berm realignment and other flood control projects and may require the removal of berms to ensure hydrological connectivity.



## PROS

- Large space for migration
- Connect new recreation space to adjacent community

## CONS

- Need to cross railroad through culverts, which is a tough right of way
- Land could require significant prep to facilitate migration and disrupt the current uses







Hayward Shoreline Mudflat



## **AXON: SFEI Adaptation Atlas**



**PRECEDENT: Undeveloped marsh migration space along Tolay** Creek Source: SFEI, Julie Beagle



**PRECEDENT:** Rush Ranch grasslands act as migration space preparation

## PROS

## CONS

- Lose stormwater detention capacity at oxidation ponds
- Land could require significant prep to facilitate migration and disrupt the current uses

• Two large migration spaces



**Hayward Shoreline Marsh** 



**PRECEDENT: Undeveloped marsh migration space near Sonoma** Creek Source: SFEI, Micha Salomon

# **DIKED POND MANAGEMENT DESIGN STRATEGY REFINEMENT**

DESCRIPTION. Diked baylands are managed as flood retention basins or for habitat, and are also used for transmission lines, rail lines, wastewater lines, and other infrastructure. The low-lying diked baylands often accumulate runoff that needs to be drained and pumped to the bay. Diked ponds can be used or expanded to increase flood water storage from precipitation-based floods, and/or store groundwater pumped from urban areas. Salt ponds provide critical habitat to endangered species.





\_\_\_\_\_



CO BAY

PROS

**Oliver Salt Ponds, 2019** 

Frank's East, 2019



Skywest Golf Course, 2017



# **TRIBUTARY CONNECTION TO BAYLANDS DESIGN STRATEGY REFINEMENT**

**DESCRIPTION.** Reconnecting creeks to their adjacent baylands through levee breaching or removal helps improve sediment, nutrient, and freshwater delivery to the baylands while achieving flood risk management and habitat benefits.





## \_\_\_\_\_ **OPTION 2** SULPHUR CREEK TAP INTO UPLAND WATERSHED

\_\_\_\_\_

\_\_\_\_\_



## PROS

**AXON: SFEI Adaptation Atlas** 

• Can potentially be breached into new restoration projects

## CONS

•

- Connected to largest upland watershed
  May impact flood control upstream- need to relocate tide gate
  - Does not do much for flood protection or SLR adaptation 1.1



PRECEDENT: Lower Walnut Creek Restoration Bockman Channel, 2019

## **OPTION 3** ALL CHANNELS RESTORE SALINITY GRADIENTS IN ADJACENT BAYLANDS BOCKMAN CHANNE LEGEND **ORO LOMA** MARSH



1 1

1 1

- E - E

--- J L

- Potential to nourish a large amount of marsh with sediment

## CONS

- May impact flood control upstream- need to relocate tide gate
- Bockman channel has low water quality, may negatively impact Oro Loma marsh • Does not do much for flood protection or
- SLR adaptation



Sulphur Creek

# **REEFS AND LIVING BREAKWATERS DESIGN STRATEGY REFINEMENT**

**DESCRIPTION.** Nearshore reefs made of oyster shell and baycrete (a cement mixture composed mostly of Bay sand and shells) provide hard substrate for shellfish and other aquatic plants and animals. They can reduce wave transmission at lower tidal elevations and stabilize areas in their lee.





**PRECEDENT: Floating breakwater, Architectural Ecologies Lab** 



## **OPTION 2** ENGINEERED BREAKWATER TARGETED EROSION REDUCTION





**PRECEDENT: Giant Marsh, Point Pinole** 

## **FLOATING BREACH BREAKWATERS OPTION 3 REDUCE EROSION AT MARSH BREACHES**



## PROS

1 1

- Less risk of sinking into bay mud
- May help accrete sediment along shoreline
- Reduce erosion on shoreline during daily tides •

## CONS

- Hard to anchor in bay mud
- Won't reduce erosion during storm surge, only daily tides

\_\_\_\_\_ 

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

• May not get as much accretion along shoreline

# **EELGRASS RESTORATION DESIGN STRATEGY REFINEMENT**

**DESCRIPTION.** Eelgrass is submerged aquatic vegetation that contributes to trapping sediment and slowing shoreline erosion. Habitat suitability depends on depth of water, light, current speed, exposure to wind waves, water temperature, and salinity.





**PRECEDENT: Giant Marsh, Point Pinole** 

# **OPTION 1** ENHANCE EXISTING BED ENHANCE EXISTING EELGRAS **BED AT COGSWELL BREACH** COGSWELI MARSH PROS • Eelgrass is already located at the breach in conditions that facilitate growth • Eelgrass could help erosion at breaches \_\_\_\_\_ \_\_\_\_\_ \_\_\_\_\_ CONS • Highly erosive environment • Eelgrass is highly sensitive to changing

environmental conditions • \_\_\_\_\_ 

\_\_\_\_\_

\_\_\_\_\_

# **ORO LOMA** MARSH MARSH

## PROS

• Eelgrass could help reduce erosion at breaches •

• \_\_\_\_\_

## CONS

- May not be ideal conditions for eelgrass • May need to increase open water to encourage eelgrass growth
- Eelgrass is highly sensitive to changing environmental conditions
- •



	_									
-	_	_	_	_	 _	 	_	_	_	_
_	_			_	 	 				
	_									

# **UPLAND SEDIMENT STRATEGIES DESIGN STRATEGY REFINEMENT**

**DESCRIPTION.** The identification of upland sediment sources or the preparation of areas that will be inundated in the future. Other strategies include preparing for future inundation, raising land to marsh plain elevation for restoration, or enhancing the landward edge to buffer against increased water inundation. Green infrastructure can also help offset the need for diked flood management ponds.





## PROS

- Allow natural processes to deliver sediment to marshes and mudflats
- Formation of mini-deltas
- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_

## CONS

- Increase of sediment in fluvial channels decreases flood capacity
- Water flows may not be significant enough to distribute sediment
- •

•



**Don Castro Dam and Reservoi** 



## PROS

1 1

1 I.

1 1

1 1

1 1

1 1

1 1

1 1

1 I

1.1

1 I.

1 I.

1 1

1.1.1

• Set up infrastructure to deliver sediment over time

•

• •

- Utilize upland sediment sources
- \_\_\_\_\_
- \_\_\_\_\_ •

## CONS

- May not be the right material
- Pipe infrastructure is costly •

# **ECOTONE LEVEE DESIGN STRATEGY REFINEMENT**

**Ecotone** levees are vegetated gentle slopes or ramps on the bay side of a levee. They can attenuate waves, provide high-tide refuge for marsh wildlife, and allow room for marshes to migrate upslope with sea level rise. Ecotone levees have a larger footprint but can provide many resilience benefits.



- PROS
- Existing tidal connections remain • Sulphur creek remains in place
- Some water control structures will be preserved
- (line A) • Combines well with creating a buffer area for groundwater pooling

## CONS

- Only partially protects critical infrastructure
- Hayward marsh not protected
- Sulphur creek not protected • May require channels to be relocated
- No storage for Hayward WWTP effluent





**PRECEDENT: Oro Loma Horizontal Levee** 



## PROS

- Preserves Oro Loma marsh
- Preserves hayward landing • Provides potential groundwater storage areas in oxidation ponds
- Allows for upland marsh migration
- Attenuates waves, reduce wave run up, prevent
- overtopping of levee crest
- Low-gradient slope does not need to be constructed from highly engineered levee core
- Line E unprotected
- Line A to be relocated
- Sulphur creek to be re-routed
- Hayward marsh not protected
- FEMA does not certify transition slope levees
- Construction would require filling the bay and modifying shoreline topography - requires multiple permits
- Largely untested

Reduces erosion

**PRECEDENT: South San Francisco Bay Shoreline Project** 

**PRECEDENT:** Deer Island, Marin Independent Journal, 2019

# **LEVEE IMPROVEMENTS DESIGN STRATEGY REFINEMENT**

Existing levees can be modified or improved to increase their resiliency to storms and sea level rise.



## SKETCH: IMPROVED LEVEE WITH CLAY CORE



\_\_\_\_\_

- ground

•





PRECEDENT: SOUTHPORT SACRAMENTO RIVER LEVEE IMPROVEMENT PROJECT, CA

# REVETMENTS **DESIGN STRATEGY REFINEMENT**

Edge stabilization provides protection along tidal areas to prevent erosion. Revetments are hardened structures made of concrete, rocks, wood, or other materials that are placed along waterways to stabilize them against waves and erosion. Riprap, which is made of rock or concrete rubble, is the most common form of shoreline protection revetment structure in San Francisco Bay.



## PROS

- Preserves Oro Loma marsh
- Hayward landing remains intact
- Stabilizes landfill edges / erosion control • More cost-effective than bulkheads or seawalls;
- requires less engineering
- Can be designed to provide habitat value
- May facilitate water access
- Can incorporate habitat for oysters, shellfish, other species, and plants

## CONS

- Requires more space for implementation (typically 2:1 slope)
- Requires multiple permits







**SKETCH: EDGE STABILIZATION AND EROSION PROTECTION** 



PRECEDENT: EASTERN SCHELDT DIKE ENHANCEMENT, THE NETHERLANDS

PRECEDENT: EDEN LANDING, UNION CITY, CA

revenment / niprap

# LAND ELEVATION **DESIGN STRATEGY REFINEMENT**

Elevating land at the site or district scale above a design flood elevation to lift future development and transportation assets out of the flood zone. This is often done to reduce the risk of flooding for new development or new uses.



**ARVERNE-BY-THE-SEA** 



## PROS

- Reduces risk of future development and transportation assets to flooding and groundwater emergence in targeting area of highest risk • May help remediate brownfields and reduce flood
- insurance rates
- \_\_\_\_\_

## CONS

• Requires a significant amount of clean dirt or fill • Raising elevations in a patchwork pattern is difficult for transportation and drainage connectivity

- Can lead to compaction and subsidence
- May cause disturbance to adjacent land
- May only provide short-term solution for sea level rise •

# **OPTION 2:** INDUSTRIAL NEIGHBORHOOD



## PROS

- Reduces risk of industrial park to flooding and groundwater emergence • May help remediate brownfields and reduce flood
- insurance rates \_\_\_\_\_
- \_\_\_\_\_ \_\_\_\_\_

\_\_\_\_\_

## CONS

. .

1 1

1.1

1.1

- E - E

JU

- Requires complete redevelopment of industrial park,
- causing significant temporary displacement • Requires a significant amount of clean dirt or fill
- Raising elevations in a patchwork pattern is difficult for transportation and drainage connectivity
- Can lead to compaction and subsidence
- May cause disturbance to adjacent land
- May only provide short-term solution for SLR •

•



# **TIDE GATES & WATER CONTROL STRUCTURES DESIGN STRATEGY REFINEMENT**

Tide gates control the movement of water, specifically from a tidewater area and a drained, upland area. Hinged doors at the end of culverts make up the gates and they are controlled by mechanisms that regulate when they open or close.



## • Provides tidal connection to frank's east • Cheaper to locate control structures as

- close to the line of protection as possible
- Need for automated tide gate in a more
- complex hydraulic system

# **OPTION 2:** STORAGE IN FLOOD CHANNELS



\_\_\_\_\_



**PRECEDENT: Lower Walnut Creek Restoration Project, CA** 



## PROS

• Provides further protection from sea level rise

\_\_\_\_\_

- Minimal impact to channel footprint • Does not require additional space
- •
- \_\_\_\_\_

### \_\_\_\_\_ \_\_\_\_\_

## CONS

1.1

- Removes visual connection to bay
- May contribute to groundwater ponding • May exacerbate flooding if water cannot be channeled
- Public Works is concerned about the loss of oxidation ponds

# **GROUNDWATER SOLUTIONS DESIGN STRATEGY REFINEMENT**

Rising groundwater tables can be addressed through an expanded subsurface drainage network that feeds into trenches/canals that flow to the bay at low tide. Tide gates are needed to prevent influx of high tides. Would require additional inland storage space to manage groundwater storage.

# **OPTION 1:** DRAINAGE + TIDE GATES PROJECT ARE UMP STATION

## PROS

- Addresses rising groundwater tables
- Good short to medium-term strategy \_\_\_\_\_
- \_\_\_\_\_ \_\_\_\_\_

- CONS
- Requires additional inland storage space
- Need to use in combination with other measures, such as tide gates and making use of the existing flood control structures.
- Needs an outlet for the collected water, and therefore it is not a long-term solution

\_\_\_\_\_

• Requires the creation of a high density system of trenches/ditches and perforated pipelines



Source: https://en.wikipedia.org/wiki/French\_drain



Source: https://www.mdpi.com/2306-5338/3/3/30

# **WASTEWATER TREATMENT ADAPTATION DESIGN STRATEGY REFINEMENT**

**DESCRIPTION.** There is potential to retrofit wastewater treatment plants along the shoreline, which are vulnerable to sea level rise. There is interest in studying the decentralization of WWTP treated discharge, the decommissioning of the EBDA pipeline, and the potential to introduce freshwater inputs to the shoreline with horizontal levee features and other methods of water polishing and local discharge.





**PRECEDENT: Novato Wastewater Treatment Plant** 



## PROS

- May be able to discharge from other WWTP's
- Fully tidal system, able to accrete and connect to cogswell marsh
- Pair with horizontal levee
- Restore salinity gradient to tidal marsh • Local discharge with EBDA retirement

## CONS

• Restrictions on discharge into fully tidal system- not permitted yet

\_\_\_\_\_

\_\_\_\_\_

• Nearshore discharge would be less likely than maintaining the EBDA pipeline

•

# **PUBLIC ACCESS + THE BAY TRAIL DESIGN STRATEGY REFINEMENT**

DESCRIPTION. Public access strategies include Bay Trail adaptation plans, additional sites for public access, new types of recreation, expansion of the SF Bay Water Trail, and enhanced connections. Aligning with other adaptation and restoration projects may enhance recreation benefits and increase community



Bay Trail Existing Conditions, 2019



## PROS

- Diverse bay experience adjacent to blue water • Maintains current alignment which is existing and
- permitted

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

## CONS

• Bay trail remains in exposed position near bay edge • May have to elevate, repair levees that are not associated with other restoration / flood protection

\_\_\_\_\_

projects • Costly to elevate and repair levees







# **BUILDING SCALE STRATEGIES DESIGN STRATEGY REFINEMENT**

**DESCRIPTION.** There are many building scale strategies that can be implemented to adapt to sea level rise. From improving standards, such as building codes and removing regulatory impediments, such as zoning height restrictions The City can also aid businesses and homeowners to assist them with understanding the resilience options available to them and with finding the funding to support those options.

# **PHYSICAL STRATEGIES**

![](_page_13_Picture_3.jpeg)

**PRECEDENT: Brooklyn Grange, Rooftop Farm** (Industry City, Sunset Park, NY)

# **IMPLEMENTATION OPTIONS**

![](_page_13_Figure_6.jpeg)

## **EXAMPLES**

- Incorporating sea level rise (image above)
- Extending requirements to 500-yr floodplain
- Storage requirements for hazard materials

## PROS

- Reduces risk to future development
- Ensures resilient development
- •

## CONS

•

•

•

![](_page_13_Picture_18.jpeg)

## EXAMPLES

- Competitive funding for innovative flood mitigation technologies (e.g. NYC rise program)
- Loans/grants modeled on CA water board brownfield
- remediation loans/grants • Tax incentives modeled on CA solar tax credit

## PROS

- Supports businesses and homeowners before, during, and after an emergency or other disruption • Funding will allow more vulnerable areas to adopt
- resilient measures
- \_\_\_\_\_ • •

## CONS

. .

. .

JU

- Requires funding • Need to ensure people will take advantage of offerings
- \_\_\_\_\_ • •

![](_page_13_Picture_31.jpeg)

**OPTION 2 PROVIDING LOANS/GRANTS/ TAX INCENTIVES FOR IMPLEMENTATION** 

Floodproofing strategies (elevate, wet floodproof, dry floodproof)

## **OPTION 3** TECHNICAL SUPPORT & **EDUCATION**

![](_page_13_Picture_39.jpeg)

## EXAMPLES

- Modeled after seismic retrofitting awareness campaigns
- NYC business emergency preparedness risk audits

## PROS

- Provides resources to recover from and prepare for future floods and climate risks
- Cost-effective way to prepare residents / property owners for future challenges •

•

## CONS

JU

- May require additional staff and funding to coordinate support and education levels
- Requires effective community engagement to ensure participation in programs

•

•

•

![](_page_13_Picture_49.jpeg)

![](_page_13_Picture_50.jpeg)

**On-site pumping, storage** 

![](_page_13_Picture_52.jpeg)

# MANAGED RETREAT **DESIGN STRATEGY REFINEMENT**

DESCRIPTION. Managed retreat is a management strategy for retreating from vulnerable coastal areas, moving the shoreline inland and restoring natural areas thereby providing a buffer from flooding and better managing hazard risk.

![](_page_14_Picture_2.jpeg)

## PROS

• Reduce risk of damage from future SLR and flooding • Maintain access to coastal areas while enhancing

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

- protection • Enhance ecosystem function with natural
- infrastructure by returning land to natural habitat \_\_\_\_\_

## CONS

- Very costly • Lack of available land to move these assets, which may require eminent domain
- Requires multiple-agency coordination and long-term planning

\_\_\_\_\_

\_\_\_\_\_

 "Takings" Law • 1 1

1 I.

1 I.

![](_page_14_Picture_13.jpeg)

**PRECEDENT: Surfers Point Managed Retreat, Ventura, CA** 

## **OPTION 2** MANAGED RETREAT OF VULNERABLE **NEIGHBORHOODS/ INDUSTRIAL AREAS (4' SLR)**

![](_page_14_Figure_16.jpeg)

## PROS

- Reduce risk of damage from future SLR and flooding • Reduce cost associated with recovery if not relocated • Maintain access to coastal areas while enhancing protection
- Enhance ecosystem function with natural infrastructure by returning land to natural habitat

•

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

## CONS

- Requires available land to move neighborhoods and industrial areas to
- Industrial land use encroaching on other land use further inland
- Potential remediation concerns
- Very costly • No precedent for buyout program of industrial area
- Counter to City's goals for economic development
- Requires property-owner buy-in
- Reduce tax base

![](_page_14_Picture_28.jpeg)

**PRECEDENT: Ile de Jean Charles** 

1.1

## **OPTION 3** LIMITATIONS OF FUNDING AND RESTRICTIONS **ON REBUILDING POST-DISASTER (4' SLR)**

![](_page_14_Picture_31.jpeg)

![](_page_14_Picture_32.jpeg)

## PROS

. .

1 1

1.1

1 1

1.1

1.1

1.1

1 1

1 I.

1 I.

1.1

1.1

- protection

• Reduce risk of damage from future SLR and flooding • Maintain access to coastal areas while enhancing

## • Enhance ecosystem function with natural infrastructure by returning land to natural habitat • Can be integrated into Land Use code

•

•

•

## CONS

• Could be placing those who are unable to retreat at a disadvantage

•

•

• \_\_\_\_\_

•

- Displacement
- Legal aspects of restricted development Reduce tax base
- \_\_\_\_\_