

LETTER 14

Sent by: CURRENT PLANNING DIVISION

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COUNTY OF ORANGE

RESOURCES & DEVELOPMENT MANAGEMENT DEPARTMENT

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NCL 04-023

May 6, 2004

Jonathan Borrego, Principal Planner
City of Anaheim Planning Department
200 South Anaheim Boulevard, Suite 162
Anaheim, CA 92805

SUBJECT: DEIR for the City of Anaheim General Plan and Zoning Code Update Program

Dear Mr. Borrego:

The above referenced item is a Draft Environmental Impact Report (DEIR) for the City of Anaheim. The proposed General Plan and Zoning Code Update Program consists of a comprehensive update to the City's General Plan and Zoning Code (Title 18 of the Anaheim Municipal Code), which identifies the City's vision for its development through build out.

The County of Orange has reviewed the DEIR and offers the following comments regarding flood concerns:

1. Page 5-112 of the DEIR states that:
 - a. *'The County of Orange's minimum criteria for County channels is to provide at least a 20-year channel capacity, provided that buildings are protected from inundation for a 100-year storm event.'*

It is the goal of the County of Orange and the Orange County Flood Control District (OCFCD) to provide 100-year flood protection for all buildings. To provide for this goal, OCFCD attempts to design facilities to convey 100-year flows where feasible. Several OCFCD's facilities are a mixture of segments built at different times. Improvements of deficient OCFCD facilities are programmed in OCFCD's Seven-Year Flood Control Projects Plan subject to annual review and revision based on Countywide prioritization. We recommend that the City condition developments located adjacent to flood control channels to participate in funding to implement improvements to OCFCD's deficient flood control channels so that the needed protection for the proposed developments may be provided.

- b. *"With the exception of the South Central Anaheim area, which drains into the Anaheim-Barber City Channel, a 25-year storm design standard should be used for all other channels (and their tributary areas) within the City."*

14-2

100-year discharges should be used for the design and improvements of OCFCD's regional facilities within the City. City standards may be used for the design and improvement of drainage facilities owned and maintained by the City.

2. Page PSF-18, 2nd paragraph of the Draft General Plan states that "The intermediate facilities are primarily designed according to a 25-year storm standard."

14-3

Please see comments 1a and 1b above. Also, please refer to page 3-1 of the County of Orange Local Drainage Manual for facility classifications used by the County and OCFCD.

3. Page 5-131, Mitigation Measure 5.7-1 states that "The City shall work with the Orange County Flood Control District to ensure that flood control facilities are well maintained and capable of accommodating, at a minimum, future 25-year storm flows."

14-4

a. As mentioned in comment 1a above, we recommend that the City condition developments located adjacent to flood control channels to participate in funding and implementation of improvements to OCFCD's deficient flood control channels so that the needed protection for the proposed developments may be provided.

b. When OCFCD facilities are involved, "25-year storm flows" should be replaced with "100-year storm flows" in this segment of the report. Please see comment 1b above.

4. One of the General Plan's policies related to drainage is to improve the City's storm drain system to address current deficiencies and future development's long term needs to minimize flood damage and adequately convey 25-year storm runoff.

14-5

Improvement of deficient local drainage facilities are likely to have the potential to deliver higher discharges to downstream areas with floodplains and deficient flood control facilities. Consequently, the City should analyze impacts resulting from such action and mitigate impacts in consultation with the County's Flood Control Division to ensure flooding potential is not worsened or floodplains and flooding problems are not shifted elsewhere.

14-6

5. Proposed improvements to drainage facilities owned and maintained by the City that are likely to impact OCFCD's flood control facilities should be brought to the attention of the Manager, Flood Control Division. Encroachment Permits should be obtained from the County's Public Property Permits Section for any activity performed within OCFCD's right-of-way.

- 14-7 | 6. Back-up calculations for peak flows shown on Table 5.7-2 of the DEIR were not provided. These flow rate values were used for preliminary assessment of existing storm drains owned and maintained by City. This was not part of our review. These should be reviewed by the City.
7. The Drainage Report in Appendix N of the DEIR provided a preliminary assessment of the City's local facilities without regard to downstream regional facilities. Page N-17 of the report states that "Any detailed assessment of baseline conditions and analyses would be conducted as part of a future City-wide Master Plan of Drainage, Area Master Plans, specific site development plans, or Capital Improvement Projects."
- 14-8 | The City-wide Master Plan of Drainage should be accomplished with an understanding of downstream conditions including any impacts to OCFCD's regional flood control facilities. It is requested that the County's Flood Control Division be provided a copy of the City-wide Master Plan of Drainage.
8. Page 5-133 of the DEIR states that "...flood inundation resulting from dam failure due to strong seismic activity is a potential hazard for the City."
- 14-9 | The DEIR should also address the need for emergency response procedures for flood warnings and evacuations in the event of uncontrolled dam failure. An evacuation plan should be ready for use if notified by the operators of Carbon Canyon Dam, Prado Dam and Walnut Canyon Reservoir.

Thank you for the opportunity to respond to the DEIR. If you have any questions, please contact Charlotte Harryman at (714) 834-2522.

Sincerely,



Ronald L. Tippetts, Chief
Public Projects

2. Response to Comments

14. Response to Comments From Ronald L. Tippetts, Chief, Public Projects, County of Orange Resources and Development Management Department, Dated May 6, 2004

14-1 Per your request, Page 5-112 of the DEIR has been revised as follows:

The County of Orange's minimum criteria for County channels is to provide at least a 20-year channel capacity, provided that buildings are protected from inundation for a 100-year storm event. Major regional drainage facilities such as the Santa Ana River are designed to provide protection against major loss of life and property for a 100-year event. **It is the goal of the County of Orange and the Orange County Flood Control District (OCFCD) to provide 100-year flood protection for all buildings. To provide for this goal, OCFCD attempts to design facilities to convey 100-year flows where feasible. Several OCFCD's facilities are a mixture of segments built at different times. Improvements of deficient OCFCD facilities are programmed in OCFCD's Seven-Year Flood Control Projects Plan subject to annual review and revision based on Countywide prioritization. The County recommends that Cities condition developments located adjacent to flood control channels to participate in funding to implement improvements to OCFCD's deficient flood control channels so that the needed protection for the proposed developments may be provided.**

With the exception of the South Central Anaheim area, which drains into the Anaheim-Barber City Channel, a 25-year storm design standard should be used for all other **City-owned and maintained** channels (and their tributary areas) within the City. Because the Anaheim/Barber City Channel can only convey the maximum flow of a 10-year storm, the facilities that are tributary to the channel are master planned to accommodate only a 10-year storm.

14-2 Please refer to Response 14-1.

14-3 Per your request, the page PSF-18 of the General Plan, 2nd Paragraph has been updated as follows:

The **City-owned and maintained** intermediate facilities are primarily designed according to a 25-year storm standard.

14-4 Per your request, Mitigation Measure 5.7-1 of the DEIR has been revised as follows:

5.7-1 The City shall work with the Orange County Flood Control District (**OCFCD**) to ensure that flood control facilities are well maintained and capable of accommodating, at a minimum, future 25-year storm flows **for City-owned and maintained facilities, and 100-year storm flows for County facilities.** **Where improvements to local drainage facilities have the potential to increase discharges to County facilities, the City shall analyze potential impacts to County facilities in consultation with the Manager, County of Orange Flood Control Division. Encroachment Permits shall be obtained from the County's Public Property Permits Section for any activity performed within OCFCD's right of way.**

14-5 Please refer to Response 14-4.

2. *Response to Comments*

- 14-6 Please refer to Response 14-4.
- 14-7 Comment is hereby noted, included in the official environmental record of the proposed project, and will be forwarded to the appropriate City of Anaheim decision-makers for their review and consideration.
- 14-8 Comment noted. The City of Anaheim will forward a copy of the City-wide Master Plan of Drainage to the County of Orange, Flood Control Division.
- 14-9 As described in the General Plan, The City of Anaheim has an emerging preparedness plan that complies with State law and interfaces with other cities and counties within Southern California. The plan outlines the operations that shall be taken in the event of a disaster. It also allows for coordination with other agencies in the event that Anaheim is affected by a disaster elsewhere. The plan addresses a warning system, emergency broadcast system (EBS), Emergency Operations Center (EOC), and shelter system. The plan provides a foundation to conduct operations and coordinate the management of critical resources during emergencies. It also provides the framework for which non-governmental agencies and organizations that have resources needed to meet emergency requirements are integrated into the program.

The City of Anaheim also participates in the Standardized Emergency Management System (SEMS). The Governor's Office of Emergency Services administers SEMS and coordinates multi-agency responses to disasters. SEMS is required by the California Government Code and was developed to provide a "common language" for emergency response personnel to request resources and equipment from other agencies. In addition to resource allocation, SEMS was established to minimize the duplication of efforts during emergency response by defining common tactics and identifying a clear chain of command. The SEMS program is developed to respond to incidents as they occur, and does not provide long-term recovery guidelines. These programs adequately address emergency response procedures relating flood warnings.



2. *Response to Comments*

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