



**County of Orange**  
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DEPARTMENT OF  
COMMUNITY DEVELOPMENT

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NCL 98-23

Jim Barnes, Project Planner  
City of Huntington Beach  
Department of Community Development  
2000 Main Street  
Huntington Beach, CA 92648

SUBJECT: DEIR for the Parkside Estates

Dear Mr. Barnes:

The above referenced item is a Draft Environmental Impact Report (DEIR) for the City of Huntington Beach. The proposed project would develop 208 single residential homes on 49 acres of property located west of Graham Street and south of Kenilworth Drive. Approximately 44 acres are located in the City of Huntington Beach and approximately 5 acres are located within the County of Orange.

OCPD-1

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

Flood

1. We generally concur with Mitigation Measures 1, 2, and 3 whereby the developer is required to provide local drainage improvements, add a pump to Slater Pump Station, and reconstruct the East Garden Grove-Wintersburg Channel (EGGWC) levee adjacent to both the 44-acre City parcel and the 5-acre County parcel. Any levee reconstruction should be accomplished in accordance with recommendations contained in the project report for EGGWC and to standards and criteria used by the Orange County Flood Control District (OCFCD) for similar facilities. It is also important to note that the reconstruction of EGGWC levee alone may not provide the required flood protection for the development nor remove the project site from a 100-year flood plain. Adequate additional steps, such as raising the pads of the homes, may also be required to provide the necessary flood protection for the proposed development.
2. The Federal Emergency Management Agency (FEMA) uses different criteria from that used by the project proponent in Technical Appendices – Volume II, Appendix F, Flood Plain Analysis to analyze levee channel systems. Consequently, the results of the analysis provided in the appendix is not suitable for delineating a floodplain or setting pad elevations. It is suggested that the flood plain analysis be based on FEMA regulations.

OCPD-2

OCPD-3

3. For your information, the County has retained WEST Consultants to prepare a floodplain study on EGGWC for submittal to FEMA. However, the study is not complete.

OCPD-4

4. Work within OCFCD right-of-way, or work on the proposed improvements to Slater Pump Station will require a County encroachment permit.

OCPD-5

### Recreation

5. Bikeways:

The Commuter Bikeways Strategic Plan and the County Bikeway Plan each designate a Class I (off-road paved, striped and signed) bikeway along the alignment of the East Garden Grove-Wintersburg flood control channel (C05) from Graham Street/Slater Avenue to Pacific Coast Highway. The project should implement the proposed bikeway on that part of the flood control facility within the project boundaries to facilitate connection with the flood control facility that will remain in the Bolsa Chica wetlands restoration plan. Developer should continue coordinate with County regarding this facility.

OCPD-6

a) Exhibits 6c and 6c-1, Section "A" – "A"; the label "Proposed Trail" should be changed to "Proposed Class I Bikeway". Moreover, the standard width for a Class I (paved off-road) bikeway is 14 feet which includes 10 feet of bikeway surface and at least 2 feet of clearance on each side. The DEIR should be so revised.

OCPD-7

b) Page 3-14, Park/Open Space Uses; it is suggested that the proposed park be linked to a Class I bikeway along the Wintersburg Channel via a Class I connector bikeway.

OCPD-8

c) Page 3-30, Project Objectives (Applicant); it is suggested that the following project objective be added:

"Provide a Class I bikeway connecting the project site to Graham Street, the proposed local park and the future Bolsa Chica open space trails/bikeway system".

OCPD-9

6. Local Park Code Compliance:

a) The DEIR should provide an analysis which indicates both the City and County Local Park Code requirements based upon the proposed number of dwelling units to be built. Moreover, how the requirement is being met should also be indicated.

OCPD-10

### Transportation

7. The project is adjacent to Graham Street, a designated secondary arterial highway. If Graham Street is not currently built out to this standard, the project should provide for implementation of this facility consistent with its classification.

OCPD-11

### Water Quality

8. In the County's EIR NOP comment letter dated October 15, 1997, it was requested that the EIR address the fact that a downstream body of water receiving flow from the project (Huntington Harbor) is officially recognized as "impaired" and thus in need of improvement from current conditions. This was not discussed in the EIR. OCPD-12

Consequently, an appropriate criteria of significance of impacts for any development projects in this area should be "whether runoff from the completed project area may adversely affect the designated Beneficial Uses in the runoff-receiving watershed, or substantially impact public agency efforts to improve recognized conditions of current water quality impairment". OCPD-13

Since no scientific or environmental studies were conducted in the process of developing the Countywide Drainage Area Management Plan Standard Conditions referenced in the EIR, concluding that compliance with these standard measures would ensure the project has no significant impacts may be unwarranted. OCPD-14

Geology

9. We suggest that special publication 117 – Guidelines for Evaluation and Mitigating Seismic Hazards in California, adopted March 13, 1997 by the State Mining and Geology Board, in accordance with the Seismic Hazards Mapping Act of 1990, be utilized in evaluation of the subject site. OCPD-15

10. We recommend that discussion/evaluation relative to lateral spread or seismically induced landslide hazards be provided in the EIR. OCPD-16

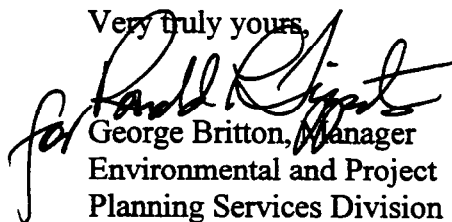
11. The EIR should address any potential adverse impact upon the stability and/or function of existing utility/service lines or other improvements (e.g. Flood Control Channel). Any grading and/or improvement activities impacting County improvement will require an encroachment permit. OCPD-17

Other

12. Although the County can begin processing discretionary permits in consultation with City of Huntington Beach subject to Coastal Commission's approval on the required Coastal Development Permit, the County can not process the subdivision map, Tentative Tract 15419, before annexation because portions of lots within the proposed Tract 15419 are located in both City of Huntington Beach and the County of Orange jurisdictions. OCPD-18

Thank you for the opportunity to respond to the DEIR. If you have any questions, please contact me or feel free to call Charlotte Harryman directly. Charlotte may be reached at (714) 834-2552. OCPD-19

Very truly yours,

  
George Britton, Manager  
Environmental and Project  
Planning Services Division