



County of Orange
Planning & Development Services Department

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JAN 20 2000

NCL 99-114

Mr. Brad Wetstone, CPUC
c/o Aspen Environmental Group
30423 Canwood Street, Suite 215
Agoura Hills, CA 91301

SUBJECT: DSEIR for the Proposed Bolsa Chica Water Line and Wastewater Service Project

Dear Mr. Wetstone:

The above referenced item is a Draft Supplemental Environmental Impact Report (DSEIR) for the California Public Utilities Commission (CPUC). The proposed project consists of the construction and operation of an underground water transmission line to deliver water to the Bolsa Chica Planned Community site, located at the southerly terminus of Bolsa Chica Street in unincorporated Orange County territory. The water line would extend from the Southern California Water Company's existing domestic water system in the City of Cypress to the Bolsa Chica Planned Community site (a total of approximately 6.7 miles), terminating at a 4-million gallon underground water storage reservoir to be constructed on the residential development site.

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

FLOOD

1. A three-party "Memorandum of Understanding" (MOU) between the Orange County Flood Control District (OCFCD), the Department of Army, and the project proponent will be needed to guarantee prior easement rights to OCFCD within the Federal easement areas of the flood control channel. The MOU is needed to (i) ensure priority for OCFCD's easement rights, (ii) ensure long-term facility compatibility requirements under Bolsa Chica Channel's existing and ultimate design, and (iii) indemnify OCFCD as to any future costs that might arise as a result of the water line placement within, across, and/or easement acquisition requirements applicable to this project.
2. The crossing under I-403/SR-22 and the longitudinal encroachment along Bolsa Chica Channel (C02) upstream of I-405/SR-22 may be allowed as a permitted facility provided the developer constructs the water line as outlined below:

5-1

5-2

- a. The proposed water line must be constructed outside of the influence line of the OCFCD’s ultimate flood control channel excavation limits. Alternatively, the water line can be constructed after the OCFCD completes its ultimate flood control improvements in this area. 5-2
- b. The proposed pipeline crossing under I-405/SR-22 must be kept clear of the location of the future jacked conduit for Garden Grove channel (C02S02). Preliminary information shows that the proposed pipeline would need to be significantly deeper than what was indicated in the submittals received.
- 3. We are also attaching a copy of the memo submitted by our Flood Design staff to the County Property Permits dated January 13, 1999 to reiterate our concerns regarding the permit application submitted by the original proponent of the project (Southern California Water Company). Our comments/concerns contained in this permit application review are still valid until such time that a revised set of plans is resubmitted. 5-3

WATER QUALITY

- 4. The DSEIR states on Page C.6-17 that “there is no possibility” of water quality impacts to the surface environment associated with pipeline leaks or spills “because the pipeline will be used only to transport drinking water”. This conclusion cannot be drawn as water quality standards deemed necessary to protect aquatic organisms (notably amphibians) may be stricter than those required for drinking water. 5-4
- 5. The DSEIR does not address how potable water will be managed during line or pump cleaning and repairs particularly when superchlorinated water is being applied for sanitary cleansing. Without reference to a National Pollutant Discharge Elimination System (NPDES) permit that would specifically address this, the water company would have no authority to discharge any water so derived to any point of ultimate disposal other than a sanitary sewer system. 5-5
- 6. The DSEIR states on Page C.6-13 that a Storm Water Pollution Prevention Plan (SWPPP) must be prepared in compliance with the NPDES General Construction Activity Permit and on Page C.6-16 that the effectiveness of the sediment Best Management Practices (BMPs) vary. The BMPs incorporated into the SWPPP should be such that the impact from sediment runoff is reduced to a level of insignificance. 5-6

BIKEWAYS

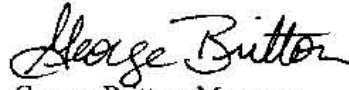
Page C.3-17 (Impacts on Bicycle and Pedestrian Circulation), Page C.9-9 (Segments 7 and 8) and Pages C.9-14 through C.9-16:

- 7. The regional Commuter Bikeways Strategic Plan (CBSP) identifies an existing, regional, Class I (paved off-road) bikeway along Rancho Road/Anaheim Barber City Channel. The DSEIR should address this bikeway, including any mitigation measures necessary to 5-7

provide safe and easy access for pedestrians and bicyclists who would be using the regional bikeway where it joins Bolsa Chica Street.

Thank you for the opportunity to respond to the DSEIR. If you have any questions, please contact me or feel free to call Charlotte Harryman directly. Charlotte may be reached at (714) 834-2522.

Very truly yours,



George Britton, Manager
Environmental and Project
Planning Services Division

Attachment

CH



County of Orange

MEMO

DATE: January 13, 1999

TO: Dan Bigger, PFRD/RPD/County Property Permits

FROM: W. P. Niemann, Civil Engineer, PFRD/DD/Flood

SUBJECT: Permit Application No. 98-00722FU

1. Bolsa Chica Channel, C02
2. Anaheim Barber City Channel, C03
3. Westminster Channel, C04
4. Sunset Channel, C07
5. Orangewood Storm Drain, C02P01

Per request, the following comments/concerns regarding the subject permit application are noted below:

Comments/Concerns:

Segment 1

- Vertical elevations noted the on record drawings retained in this office for existing OCFCD facilities differ significantly from that presently depicted on the applicant's submitted plans.
- At the crossing of Sunset Channel (C07), a vertical clearance of at least two feet between the bedding for the existing Double Barrel RCB and the top of the proposed 18" Water Transmission Main should be maintained.
- For the proposed utility bridge at Westminster Channel (C04), no structural calculations were submitted for the review.

Note: Because Westminster Channel (C04) was originally designed to convey 65% of the 25-year storm event, it is highly recommended that the proposed pipeline be installed underneath the invert of the channel in lieu of the proposed utility bridge to accommodate future channel improvements. It is also recommended that a minimum vertical clearance of 3¹/₂ feet be maintained between the top of the pipe and the invert of the channel for the full width of OCFCD's existing right-of-way. Approval of the applicant's proposed method of crossing C04 is deferred to PFRD's Program Development Division and Operations and Maintenance Division.

- Additional comments/concerns are noted on sheets 9, 11, 20, 21, and 22 of the submitted plans.

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Segment 2

- Vertical elevations from surveys recently completed by this Department and those noted on record drawings differ significantly from that depicted on the applicant's submitted plans.
- The exact location of the proposed utility crossing over Anaheim Barber City Channel (C03) is unclear. (Is the crossing directly adjacent to the existing bridge/culvert, 5 feet away, etc.?) A more detailed plan view/description of this location is required.
- At the I-405/22 Interchange, the proposed utility crossing may interfere with OCFCD's plans to realign the City of Garden Grove's facility, Garden Grove Storm Channel (C02S02). Realignment of C02S02 is necessary to increase Bolsa Chica Channel's (C02) conveyance capacity upstream of the I-405/22 Interchange.
- Due to PFRD's intent/desire to award a construction contract by the end of this fiscal year to construct channel improvements from the I-405/22 Interchange to Belgrave Avenue on Bolsa Chica Channel (C02), issuance of a permit to the applicant to construct improvements within this area is not recommended. PFRD, however, may be amenable to include the proposed utility improvements within its construction contract for the channel.
- This type of longitudinal encroachment into OCFCD property is usually not permitted. Acquisition of an easement by the applicant from OCFCD would be a more appropriate means of attaining rights within the area. This subject matter is deferred to the Program Development Division and the Real Property Division.
- Since preliminary hazardous materials investigations performed by this Department identified the presence of chlorinated hydrocarbons within the perched water table downstream the Lampson Avenue, dewatering operations conducted by the permit applicant will require treatment. Although the primary responsible parties have been identified by the California Regional Water Quality Control Board (CRWQCB), legal issues and responsibilities regarding issuance of any permit in this area may arise. It should also be noted that the extent of the plume has also not been identified. Additional information regarding this subject matter may be obtained from Mel Newman of PFRD (714) 567-6372 or Leslie Alford of CRWQCB (909) 782-4903.
- Additional comments/concerns are noted on sheets 3, 11, 12, 13, 14, 15, and 16 of the submitted plans.

Segment 3

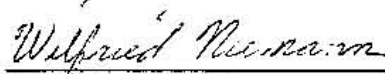
- Vertical elevations from surveys recently completed by this Department and those noted on record drawings differ significantly from that depicted on the applicant's submitted plans.
- Due to PFRD's intent/desire to award a construction contract by the end of this fiscal year to construct channel improvements from the I-405/22 Interchange to Belgrave

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Page 3

Avenue on Bolsa Chica Channel (C02), issuance of a permit to the applicant to construct improvements within this area is not recommended. PFRD, however, may be amenable to include the proposed utility improvements within its construction contract for the channel.

- The proposed utility crossing of Belgrave Storm Channel (C02S05), which is a City owned facility, will need to be modified to accommodate changes to the structure and its alignment presently being proposed by this Department.
- Neither Orangewood Storm Drain (C02P01) or the impacts to the facility from the proposed utility crossing were identified/shown on the submitted plans.
- Additional comments/concerns are noted on sheets 3, 4, 5, 6, 7, 8, 10 and 12 of the submitted plans.

If you have any questions, please call me at (714) 834-2792.


W. P. Niemann, P.E.

WPN.98-00722FU

Cc: N. H. Majaj, Senior Civil Engineer, PFRD/DD/Flood
J. A. Miller, Chief, PFRD/DD/Flood

**RESPONSES TO THE COUNTY OF ORANGE
Planning & Development Services Department
Letter Dated January 20, 2000**

- 5-1 Thank you for the information. This comment was noted and passed on to SCWC.
- 5-2 Thank you for the information. This comment was noted and passed on to SCWC.
- 5-3 Thank you for the information. This comment was noted and passed on to SCWC.
- 5-4 The sentence has been revised to state “there is a low probability of water quality impacts...” to address this concern.
- 5-5 Chlorinated water will be managed as described in the Pipe Flushing and Disinfection section provided on page B-32 of the Draft SEIR.
- 5-6 The RWQCB will oversee the BMPs applied, in accordance with the NPDES permit.
- 5-7 This comment has been noted. Mitigation Measure T-6 requires the contractor to identify bicycle routes/facilities, such as the Class I bikeway along Rancho Road/Anaheim Barber City Channel, which could be affected by the pipeline construction.