

**COMMENT LETTER 100, GREGOR BLACKBURN, CHIEF, FLOODPLAIN  
MANAGEMENT AND INSURANCE BRANCH, FEDERAL EMERGENCY MANAGEMENT  
AGENCY**

**Response to Comment 100-1**

*Comment Summary: The commentor asks the City to review the current effective Flood Insurance Rate Maps (FIRMs) for the City of Santa Rosa (Community Number 060381) and notes the City is a participant in the National Flood Insurance Program (NFIP), and provides a reference of the minimum, basic NFIP floodplain management building requirements.*

Even though the seasonal storage sites have been annexed as part of the City of Santa Rosa, the properties are not contiguous to the City and therefore are not covered in FIRM 060381. As described in Volume 5 of the Draft EIR (TM-3), current effective FIRM for the project sites is Community Panel Number 060375 0695 B, Sonoma County, revised April 2, 1991. The City acknowledges that it is a participant in the NFIP, and NFIP floodplain management building requirements apply to the project. The significance thresholds used in Section 4.4 Surface Water Hydrology are consistent with the NFIP floodplain management building requirements; refer to that section for an analysis of potential flood impacts.

**Response to Comment 100-2**

*Comment Summary: The NFIP floodplain requirements state that all buildings constructed within a riverine floodplain must be elevated so that the lowest floor is at or above the Base Flood Elevation level in accordance with the effective FIRM.*

Because none of the proposed storage ponds meet the FEMA definition of “building” contained in 44 CFR 59.1, the requirement pertaining to floor elevation does not apply. The embankment design for the storage ponds would follow design guidelines of the NFIP for levees and embankments. The design requirements are typically consistent with the U.S. Army Corps of Engineers Design Guidelines. If the pump stations at the KF1, KF2 or BF1 sites are placed at grade instead of on the pond embankment to mitigate visual impacts under Mitigation Measure 3.3.18, the pump station would not be placed within a floodplain.

**Response to Comment 100-3**

*Comment Summary: The NFIP floodplain requirements state that if the area of construction is located within a Regulatory Floodway as delineated on the FIRM, any development must not increase base flood elevation levels. A hydrologic and hydraulic analysis must be performed prior to the start of development, and must demonstrate that the development would not cause any rise in base flood levels. No rise is permitted within regulatory floodways.*

Based upon published Flood Insurance Rate Map (FIRM) for Sonoma County encompassing Kelly Farm, the Brown Farm and Alpha Farm (Community Panel Number 060375 0695 B, Map revised April 2, 1991), the area of construction is not within a designated Regulatory Floodway. FIRM map revisions for the Laguna de Santa Rosa would be reviewed during the storage pond

design process to investigate any revised designation of Regulatory Floodways within or near the Alpha, Brown, or Kelly Farm storage pond or pump station locations.

#### **Response to Comment 100-4**

*Comment Summary: The NFIP floodplain requirements state that all buildings constructed within a coastal high hazard area, must be elevated on pilings and columns, so that the lowest horizontal structural member is elevated to or above the base flood elevation. The posts and pilings foundation and the structure are anchored.*

The project is not located within a coastal high hazard area.

#### **Response to Comment 100-5**

*Comment Summary: Upon completion of any development that changes existing Special Flood Hazard Areas, the NFIP directs all participating communities to submit the appropriate hydrologic and hydraulic data to FEMA for a FIRM revision.*

According to FEMA, Special Flood Hazard Areas (SFHAs) are defined as, “the area that will be inundated by the flood event having a 1-percent chance of being equaled or exceeded in any given year.” SFHAs are labeled on the FIRM by several designations including Zone AE. The FIRM that includes the Kelly Farm, Brown Farm and Alpha Farm storage pond locations (Community Panel Number 060375 0695 B, Map revised April 2, 1991) shows the proposed pond sites lying outside the flood zone labeled Zone AE.

#### **Response to Comment 100-6**

*Comment Summary: Many NFIP participating communities have adopted floodplain management building requirements which are more restrictive than the minimum federal standards. Contact the local community’s floodplain manager for more information on local floodplain building requirements.*

Both the City and the County floodplain managers were contacted during preparation of the IRWP Program EIR when the thresholds of significance were being prepared. Floodplain management policies of both agencies were reviewed and incorporated into the thresholds of significance. Specifically, the threshold for a rise in the 100-year flood level was set at 0.1 feet, based on the recommendation of the Sonoma County floodplain management team. Please refer to Table 4.4-3 on page 4.4-12 of the Draft EIR. Impact 4.2 analyzes the potential for the seasonal storage improvements to exceed the significance threshold.