

Appendix D 2800 Casitas Flood Risk Technical Memorandum, prepared by KHR Associates, dated October 9, 2020.

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MEMORANDUM

Date: October 9, 2020
To: Ben Brosseau
From: James H. Kawamura, KHR Associates
Cc: Shane Parker, Parker Environmental
Re: 2800 Casitas Project DEIR - FEMA Response

This memorandum is provided in response to certain comments made in a letter from the law firm of Chatten-Brown, Carstens & Minter LLP, dated April 13, 2020 (hereinafter referred to as Letter), addressed to Erin Strelch at the City of Los Angeles Department of City Planning, with the subject matter being the Draft Environmental Impact Report for the 2800 Casitas Project.

On matters pertaining to the project site being within a floodplain, Section III (i.e., Pages 7-18 of the Letter), reference is made to an October 2016 Hydraulics Report, authored by the U.S. Army Corps of Engineers (Army Corps) and prepared for the City of Los Angeles. The Hydraulic Report (Report) included the results from two-dimensional hydraulic modeling and a floodplain analysis of a reach of the Los Angeles River (River) from Barham Boulevard to First Street. The 2800 Casitas Project (Project) site is one of the properties within the study (Reach 6 of the Report) that is contiguous to the River.

Army Corp Report

It is noted in the Army Corp Report that the information provided is for planning purposes only and not to be used for environmental documentation. It is further noted that only existing conditions of the River were analyzed in the Report (i.e., with significant vegetation within the soft bottom bed). There was no modeling or analysis of future conditions (e.g., with improvements to the bed or with new development along the banks of the River). The Report makes no findings, conclusions, or recommendations regarding any future development along the River. Additionally, the exhibits contained in the Report (that are referenced in the Letter) are at a scale of 1-inch = 500 feet, thus, making it impossible to accurately depict lines of demarcation between annual chance exceedance (ACE) flood areas and non-flood areas.

Flood Hazard Zone

According to the Federal Emergency Management Agency (FEMA), the Project site is currently shown on FEMA's Flood Insurance Rate Map (FIRM) No. 06037C1626F, with an effective date of September 26, 2008, to be located entirely within Zone X (Unshaded) – a “minimal risk” area outside the 1-percent and 0.2 percent ACE floodplains (i.e., for 100-year, and 500-year storm events, respectively). In other words,

this site is not within a flood hazard zone. This information was confirmed on a phone discussion with a FEMA representative on Thursday, July 2, 2020.

The Letter claims that the 2008 FIRM Maps “do not represent current conditions at the project site,” and that the 2016 Army Corps Report contrasts FEMA’s current position by claiming the Project site is shown in the Report to be subject not only to flooding, but inundation of 15 to 20 feet in the cases of 100-year and 500-year storm events. Two small exhibits taken from portions of the full exhibits contained in the Army Corps Report are referenced in the Letter. The scale of the exhibits in the Letter are presumed to be the same as in the actual Report (i.e., 1 inch = 500 feet).

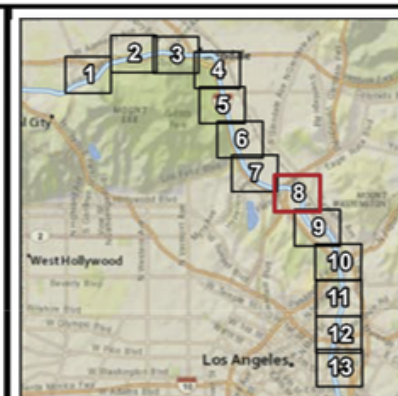
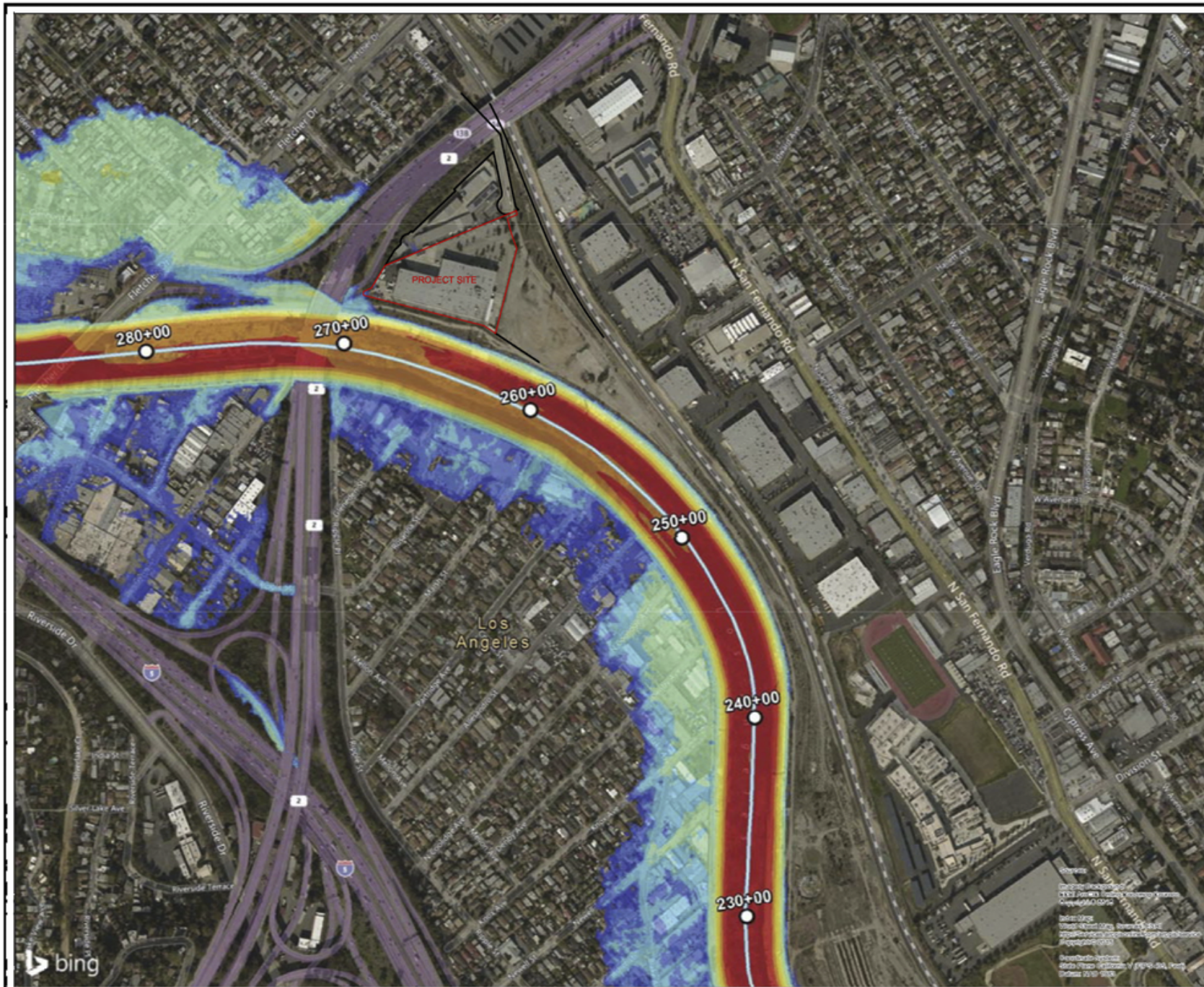
Given the scale of the exhibits, it cannot be determined with any certainty that a small corner of the Project is currently within the 1-percent ACE floodplain. As for the 0.2-percent ACE floodplain, the Army Corps model suggests that some portions of the Project site, as it currently exists, could be inundated with 1 to 2 feet of water in a 500-year storm event and some portions could be inundated with 3 to 5 feet of water.

Existing and Proposed Site Elevations

Based on a topographic survey of the Project site (see attached ALTA/NSPS survey by KHR Associates), existing mean elevations range from 365.7 to 368.9 feet above sea level. The southwest corner of the site is at the lowest elevation of 365.7 feet above sea level and is in the area that is claimed in the Letter to be within the 100-year flood hazard zone. Additionally, the 500-year flood exhibit, as shown in the Letter, seems to cover much of the property, except for the southeastern corner of the site where the existing elevation is over 368 feet. It should be noted that there is also an 8-foot high berm (or levee) that separates most of the Project site from the banks of the Los Angeles River, with a high point of 376.4 feet.

The Project Development Plan will include raised elevations above both the 100-year and 500-year flood levels. Building finish floors will be constructed at elevations of at least 369 feet and perimeter roadways and other at-grade surfaces will be raised to approximately 368 feet, more than two feet higher than the lowest existing elevation in the southwest corner of the site. The net effect will be that the entire Project site is not expected to fall within either a 100-year or 500 year storm event.





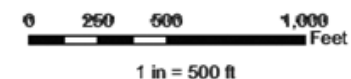
Legend

- Station
- Los Angeles River
- City Limits

1% ACE Floodplain (ft)

1 - 2	10 - 15
2 - 3	15 - 20
3 - 5	20 - 25
5 - 10	25 - 32

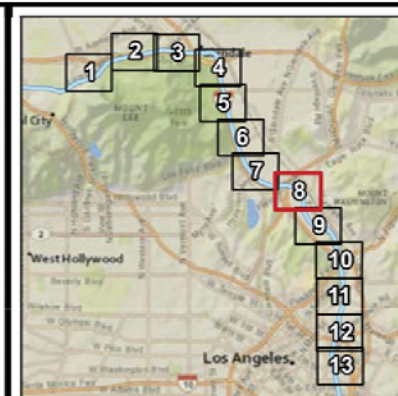
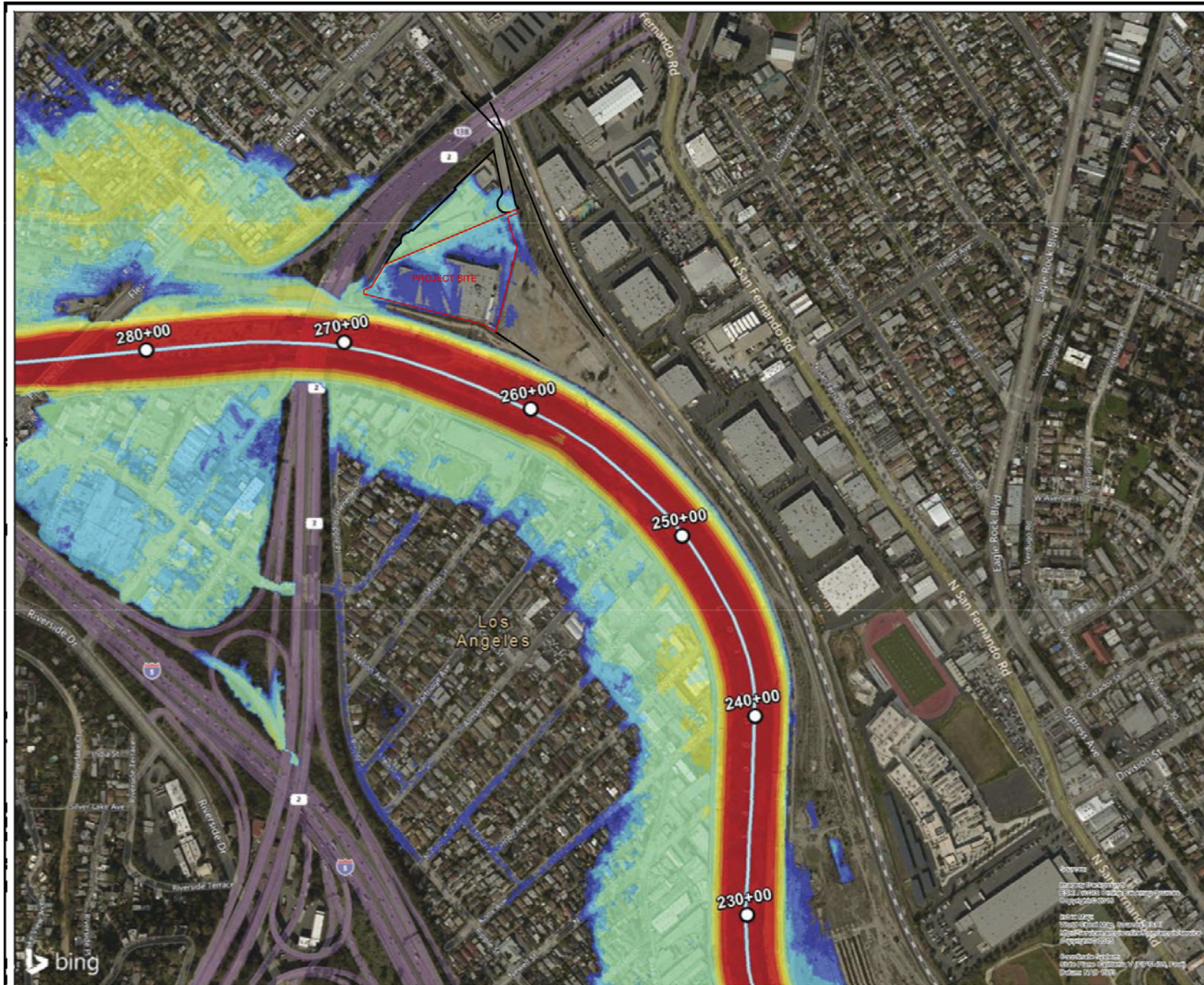
* Flood depths are based on the 1% ACE flood depth.



FLOODPLAIN MANAGEMENT SERVICES
SPECIAL STUDY LOS ANGELES RIVER
FLOODPLAIN ANALYSIS

LOS ANGELES RIVER
1% ACE FLOODPLAIN
FPMS REACH
GRID INDEX 8

U.S. ARMY CORPS OF ENGINEERS
LOS ANGELES DISTRICT



Legend

- Station
- Levee
- Los Angeles River
- City Limits

0.2% ACE Floodplain (ft)

	1 - 2		10 - 15
	2 - 3		15 - 20
	3 - 5		20 - 25
	5 - 10		25 - 35

* Flow depths less than 1 foot are not shown



1 in = 500 ft

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0.2% ACE FLOODPLAIN
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LOS ANGELES DISTRICT**