



California Coastal Commission  
South Coast Area Office  
5234 Chesebro Rd, Suite 200  
Agoura Hills, CA 91301

Attention: Mr. John Del Arroz

Subject: Response to Comments for Application No. 5-11-302 (Sunset Ridge Park)  
Site Address: 4850 West Coast Highway, Newport Beach, Orange County  
Existing and Proposed Storm Drain Alignment

Dear Mr. Arroz,

This letter is in response to the project's existing and proposed storm drain system along the west side of the property adjacent to and within the 50-foot buffer to the potentially significant vegetation areas. We believe that maintaining the current alignment of the existing open concrete channel for the proposed underground storm drain system is the most appropriate solution for the site based on the opportunities and constraints associated with the project site and the hydraulic concerns of the storm drain system as follows.

There is an existing 12-foot wide concrete trapezoidal channel that runs through the property from the southwest corner to the northwest corner of the site. The centerline of the channel is approximately 70-feet east of the westerly property line, and the entire drainage structure is located within a 35-foot wide storm drain easement dedicated to the City of Newport Beach. This open channel collects water from our site, portions of the Newport Banning Ranch (NBR) property that surface drain onto our property, and the large drainage area from the Condominium project to the north. The condominium drainage is conveyed within a 36" underground RCP storm drain that outlets to the open concrete channel on our property. The open channel continues to flow westerly as it leaves our site in the southwest corner of the property and extends across the NBR property for an ultimate connection to a Caltrans Box Storm Drain structure within Pacific Coast Highway. The 35-foot wide storm drain easement extends through the NBR property as well.

Although this existing open concrete channel could remain in its existing condition while providing the proper storm water conveyance system for the existing drainage areas it covers, the City of Newport Beach determined that replacing the open channel with an underground storm drain system would greatly benefit the environmental conditions and functionality of the proposed park and the existing adjacent habitat areas. Continuing the underground storm drain from the condominium project underground through our site offers many more opportunities to introduce proper landscape planting that both enhances the park and compliments the adjacent vegetation areas. This proposed underground storm drain would outlet into a proposed landscaped open channel prior to transitioning back to the existing open concrete channel before

the storm water leaves our property. The nature of the underground storm drain pipe will also provide opportunities to provide detention and water quality features that work in conjunction with an underground piping system.

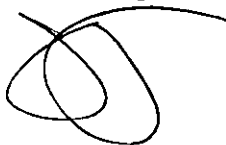
With a fixed point of connection with the existing condominium storm drain line inlet, a fixed point of connection with the existing open concrete channel that will remain on the NBR property, and an existing 35-foot wide storm drain easement that is already dedicated to the City of Newport Beach for the conveyance of these drainage areas; we believe it is appropriate that the proposed underground storm drain line maintain the current alignment of the existing open channel and storm drain easement. This alignment will have the least impact to the hydraulic system, maintains the existing easement, and will only disturb an area that previously was improved with the open concrete channel. In addition, an existing sanitary sewer mainline runs parallel to the existing open channel approximately 11 feet to the east. This sewer is in a 30-foot easement that overlaps the storm drain easement. If we tried to relocate the proposed underground storm drain out of the 50-foot buffer, then we would have to cross the existing sewer mainline in two locations. This greatly increases the constraints on the design based on the gravity flow nature of each pipe system and may not be able to work based on elevations of the existing sewer pipe.

By the sure nature of the existing alignment of the open concrete channel and the associated surface drainage patterns of the site, the existing and proposed storm drain alignments have historically always been and will be located within the 50-foot buffer to the potentially significant vegetation areas. The proposed underground storm drain will reduce the impacts to the potentially significant vegetation areas by removing the existing impervious concrete channel and introducing proper vegetative planting that will complement and enhance the adjacent vegetation areas. Based on the existing site drainage patterns and the grading required to complete the park project, there will always be some drainage structures within the 50-buffer per any grading design, and the underground storm drain that collects these structures will have a minimal impact the this zone.

As you will see in the updated park design plans, we have made many efforts to remove all surface improvements from within the 50-foot buffer to the potentially significant vegetation areas. We believe that maintaining the current alignment of the existing open concrete channel for the proposed underground storm drain system is the most appropriate solution for the site based on the opportunities and constraints associated with the project site and the hydraulic concerns of the storm drain system. Thank you for taking the time to review this letter and please call with any questions or comments.

Sincerely,  
Urban Resource Corporation

Jay Ruby  
President

A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.