

Alford, Patrick

From: James Heumann [jamesheumann@hotmail.com]
Sent: Tuesday, November 01, 2011 2:15 PM
To: Alford, Patrick
Cc: Banning Ranch Conservancy
Subject: DEIR for Banning Ranch - Comments

Mr Alford,

Please see the below comments regarding the DEIR for the Banning Ranch project dated September 2011 (State Clearinghouse No. 2009031061) .

1. The air quality (AQ) section which stated that all remediation would be finished within 3 years of the start – I serious doubt that. The remediation section did not specify, but implied the remediation work would take much longer than 3 years.
2. The document also mentions numerous closed wells and the California agency responsible for drilling new wells and closing old wells. Nowhere does it specifically state that ALL old wells would be located and closed according to agency procedures and requirements.
3. The other concern is all of these docs describe the PLAN. Things never go to plan. What are the contingencies, who will provide the oversight and approve the modified plans?
4. The AQ section describes mitigation measures for PM from grading and soil piles, but there is no discussion in the remediation section of anti PM measures for soil piles.
5. The AQ section also states that the benefit for using all Tier 4 offroad/construction equipment could not be calculated using the model. Why not? They don't explain.
6. There is little mention of the urban heat island effect of the project, other than PDF 4.11-1/2 and SC 4.11-1 that make general reference to meeting LEED or similar standards. There has been talk within the project to meet LEED Platinum, but it is not written into the DEIR. Specific mentions should be made to increase the albedo (solar reflectivity) of the project so as to minimize local warming effects of the project (*Eric Berger, Science Writer, Houston Chronicle, Saturday, 06/07/03, Section A, Page 1*). The USEPA has studied Houston, for example, ascertaining that the urban heat island effect has actually increased the temperature of the local climate from 3 F to 6 F. While the area of Newport Beach is not expected to be as warm as Houston, It is vitally important, both to the health of our populations vulnerable to extreme heat and to the larger phenomenon of global warming to include cooling practices in the proposed development.

One might expect that for a project that builds on some last remaining developable land for an area, there would be relatively modern expectations, such as a written commitment in the EIR ensuring this proposed project is minimally insignificant to the environment, objectively qualifying for at least LEED Platinum status since the first residential project to do so was back in 2006. While the project cites a commitment to LEED practices, specific items are not mentioned in the DEIR to ensure that the project is using all cooling technologies reasonably available. The proposed development should specifically mention include already existing practices to ensure a high solar reflectivity, using mitigation efforts such as cool roofs (eg planted roofs or white roofs), reflective pavement (as opposed to plain asphalt), and other cooling projects such as ensuring a higher ratio of unpaved land to paved land or built-over land. The cooling topic is insufficiently, non-specifically addressed in the

DEIR. The DEIR needs to include specific plans and sufficient goals to mitigate warming effects of the project so as to at least protect the more vulnerable among us.

Regards,

James Heumann
Costa Mesa resident