

Alford, Patrick

From: Don Bruner [don_bruner@hotmail.com]
Sent: Saturday, November 05, 2011 5:44 PM
To: Alford, Patrick
Cc: suzanne forestar; alec parker; farid ghanem; dorothy kraus
Subject: Banning Ranch DEIR Air Quality Section Questions

November 5, 2011

City of Newport Beach
3300 Newport Boulevard
Newport Beach, California 92663

Attention: Patrick Alford
palford@newportbeachca.gov

Dear Mr. Alford:

I'd like to submit the following questions regarding the Air Quality Section of the Banning Ranch DEIR:

On page 1 of the INTRODUCTION (4.10-1) under the heading "Toxic Air Contaminants," it states the following:

[...] **Toxic air contaminants (TACs)** are a diverse group of air pollutants that may cause or contribute to an increase in deaths, that may cause serious illness, or that may pose a present or potential hazard to human health. TACs include both organic and inorganic chemical substances that may be emitted from a variety of common sources, including gasoline stations, motor vehicles, dry cleaners, industrial operations, painting operations, and research and testing facilities. TACs are different from the "criteria" pollutants in that ambient air quality standards have not been established for TACs. TACs occurring at extremely low levels(*) may still cause adverse health effects, and it is typically difficult to identify levels of exposure that do not produce adverse health effects.(**)

(*) What is meant by "extremely low levels"? What are these levels and what adverse health effects are they referring to?

(**) Is the following statement from the same paragraph a contradiction? "Ambient air quality standards may not have been established for TACs." In 4.10-2 Regulatory Environment, it says:

"CARB, a part of the California Environmental Protection Agency, is responsible for the coordination and administration of both federal and State air pollution control programs in California. In this capacity, **CARB conducts research; sets the California Ambient Air Quality Standards (CAAQS)** shown in Table 4.10-1."

What are the impacts of TACs on the biological resources of Banning Ranch and especially on the critical habitat that is necessary to establish and sustain endangered species like the California Gnatcatcher? What impact does it have on vernal pools that are home to the San Diego fairy

shrimp? What is the danger of the water in the vernal pools becoming contaminated with TACs or other contaminants from the oil field operations?

In the Air Quality Section under the heading of Methodology on p4.1-6, it states:

“Local Concentrations of Criteria Pollutants from On-Site Sources

As part of the SCAQMD's environmental justice program(*), attention has focused on local air quality impacts from nearby sources. The SCAQMD developed the localized significance threshold (LST) look-up tables to allow the evaluation of localized impacts for many projects and scenarios without the complex task of dispersion modeling(**). The tables show the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable federal or State ambient air quality standard. The LST methodology is recommended for project sites that are five acres or less. However, the method may be used for construction on larger sites if it is demonstrated that the area of daily disturbance is not substantially larger than five acres and calculated project emissions for the larger site would not exceed the five acre site emissions limits (***) ; For the Newport Banning Ranch Project site, this methodology is used for the analysis in Section 4.10.7.”

(*) What is SCAQMC's “environmental justice program?”

(**) Where does the data in the LST look-up tables come from? How current is the data? How reliable is the data? How does it compare to dispersion modeling for accuracy in emission estimation?

(***) How was the five-acre “area of daily disturbance” determined and by whom? What does “substantially larger than five acres” mean?

Your consideration of these questions is very much appreciated. When can I expect a response to my questions and concerns?

Respectfully submitted,
Don Bruner
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