

November 8, 2011

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

Attention: Patrick Alford  
[palford@newportbeachca.gov](mailto:palford@newportbeachca.gov)



Dear Mr. Alford:

In going through the Air Quality section of the Banning Ranch DEIR, I came across areas under the heading Operational Emissions that need some clarification.

On page 4.10-23, under Operational Emissions, *Mass Emissions Thresholds*, it says that regional emissions of VOC, NOx and CO resulting from Project operation would exceed SCAQMD CEQA significance thresholds in 2023 and that vehicle emissions would be the primary source of the pollutants.

What will make vehicle emissions so high that they will exceed SCAQMD CEQA thresholds in 2023? Will they continue to exceed the significance thresholds beyond 2023? What percentage increase in vehicles will be operating compared to 2017 and 2011 when the thresholds will not be exceeded? How many more vehicles will be on the roads in 2023 than are today in 2011?

On page 4.10-26, as shown in Table 4.10-15, forecasted Project buildout emissions of VOCs and CO in 2023 would exceed the SCAQMD CEQA significance thresholds.

Please define buildout emissions? What is the source of these pollutant emissions? What can be done to mitigate them?

On page 4.10-26 under Total Operational Emissions, it says "the analysis of anticipated operational emissions shows that Project emissions would be less than the SCAQMD CEQA significance thresholds in 2017 and 2020, as shown in Tables 4.10-10 and 4.10-14; the impact over that period would be less than significant. As Project development continues beyond 2020, the continuing growth would result in emissions of VOCs and CO that would exceed the significance thresholds and the impact would be significant."

What does continuing growth mean specifically? Will the source of emissions primarily be vehicles?

And last, on page 4.10-27 under Concurrent Construction and Operations Emission, it talks about not adding together construction and operational emissions:

“From the beginning of occupancy of the first residences (estimated for late 2015) until the completion of construction (estimated for late 2023), there would be concurrent construction and operational emissions. For impact analysis, construction and operational emissions are not added together because the SCAQMD has separate thresholds for each type of emissions.

Isn't this a flaw in the analysis? How can we know what the total impact is if the values aren't added together, and if we don't know the total impact, how do we know what the health effects are? Also, how can mitigation be adequately addressed without knowing what the total impact and the health effects are?

Thanks for whatever clarification you can provide.



Mr. and Mrs. Don Bruner  
11 Serena Ct.  
Newport Beach, CA 92663