



South Coast Air Quality Management District

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Review of the Draft Environmental Impact Report (Draft EIR) for the Proposed Newport Banning Ranch Project

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document included with an extended review period. The following comments are meant as guidance for the lead agency and should be incorporated into the final environmental impact report (final EIR) as appropriate.

Based on a review of the draft EIR the AQMD staff is concerned about the project's operational air quality impacts, greenhouse (GHG) emissions impacts and potential for odor impacts. Specifically, the lead agency has determined that the project's operational emissions will exceed the AQMD's CEQA significance thresholds for VOC's and CO resulting in significant regional air quality impacts. Further, the project will have significant GHG emissions impacts that are primarily from mobile sources related to a substantial increase of vehicle trips associated with the proposed project's operations. However, the lead agency does not adequately address this increase in mobile source emissions and does not require sufficient mitigation measures to address mobile source emissions reductions. Therefore, the AQMD staff recommends that the lead agency minimize the project's significant air quality impacts and GHG emissions impacts by requiring additional mitigation pursuant to Section 15126.4 of the CEQA Guidelines. Also, given the project's mix of land uses (e.g., an oilfield facility within 200 feet of residences) the AQMD staff is concerned about potential odor impacts from the proposed project and recommends that the lead agency adopt an odor minimization plan for the project. Details regarding these comments are attached to this letter.

AQMD staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,



Ian MacMillan

Program Supervisor, CEQA Inter-Governmental Review
Planning, Rule Development & Area Sources

Attachment

[IM:DG](#)

ORC110913-04
Control Number

Mitigation Measures for Mobile Source Emissions

1. Based on a review of the air quality and GHG emissions analyses (Sections 4.10 and 4.11 of the draft EIR) the AQMD staff is concerned about the project's significant impacts due to mobile source emissions. Specifically, the lead agency determined that a significant amount of VOC, CO, and GHG emissions will be emitted during the project's operational phase from transportation sources. Although the lead agency determined that the project would be consistent with regional transportation strategies (e.g., SCAG Compass Blueprint) intended to reduce vehicle miles traveled (VMT), the lead agency still concludes that the project's substantial emissions, primarily from mobile sources, will result in significant impacts.

Further, under SB 375 SCAG is required to develop a sustainable community strategy (SCS) as a part of the 2012 RTP that achieves regional GHG reduction targets of 8% per capita for the planning year 2020 and 13% per capita for 2035. However, the lead agency has not stipulated specific mitigation measures or targets to reduce the substantial (i.e., approximately 50%) increase in mobile source emissions allowed under the proposed project. Therefore, pursuant to Section 15126.4 of the CEQA Guideline and consistent with the SCS the lead agency should minimize the project's significant air quality impacts by incorporating the transportation mitigation measures found in the greenhouse gas quantification report¹ published by the California Air Pollution Control Officer's Association in the final EIR.

Odor Minimization

2. On page 4.10-32, odor impacts, the lead agency states that field observations at the existing oilfield operations did not detect objectionable odors and future sensitive uses (i.e., residences and parks) would be at least 200 feet from the oilfields, therefore, detectable odors from oilfield operations would be few or none. However, the existing oilfield operation has previously been issued odor complaints. As a result, AQMD staff is concerned that bringing future residential uses substantially closer and downwind to oilfield operations could generate additional odor impacts. Therefore, the AQMD staff requests that the lead agency provide additional information on the potential for odor impacts from the proposed project in the final CEQA document and ensure that odor impacts are insignificant by requiring an odor minimization plan that includes guidelines to minimize or eliminate odors from the proposed project and provides a mechanism to address odor impacts in the future should they arise.

¹ California Air Pollution Control Officer's Association. August 2010. Quantifying Greenhouse Gas Mitigation Measures. Accessed at: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>