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November 21, 2018

Lea Choum  
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Email copy to: [EIR627@ocair.com](mailto:EIR627@ocair.com)

Subject: DEIR Comments – John Wayne Airport General Aviation Improvement Program

Dear Ms. Choum:

We are submitting the following comments on the Draft Environmental Impact Report 627 (DEIR) for the John Wayne Airport General Aviation Improvement Program on behalf of residents of Corona del Mar, a neighborhood within the City of Newport Beach. The Corona del Mar Residents Association (CdMRA) is a residents' advocacy group which covers roughly 6,300 homes between Jamboree Road on the west, Cameo Highlands/Shores on the east, Bayside Drive on the south and San Joaquin Hills on the north.

Based on the information in the DEIR, it appears that while general aviation operations are expected to increase due to the proposed project, the impacts of noise, air quality and traffic all resulting from increased flights and frequencies have not been sufficiently addressed. The following provides our specific comments.

1. The DEIR appears to be understating the potential impacts of the project on air quality, noise, and traffic. No substantial evidence was provided in the DEIR to support the assumptions that by 2026 40% of the Boeing 737 and Airbus A320 aircraft utilizing the airport will include newer Boeing 737-MAX and Airbus A320-NEO with substantially quieter engines. Since this assumption cannot be supported by facts, the DEIR must use assumptions that err on the side of worst-case or maximum impacts for environmental analyses that include noise and air quality. The DEIR must provide a thorough analysis of these issues and the impacts associated with different fleet mixes, to provide an adequate analysis of the environmental impacts, should the assumed fleet mix not be achieved.
2. The existing and proposed flight patterns for general aviation are not discussed in detail. Therefore, the potential impact of a change in flight patterns cannot be determined.

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3. Sensitive Receptors: There are several areas near the airport where applications for new development of residential areas have been proposed and have undergone or are in the process of undergoing environmental review including: (1) the Koll Center Residences project (located within the Koll Center Newport) proposed for up to 260 residential units; (2) Newport Crossings (located at in the Newport Place Planned Community, adjacent to the airport) proposed for 250 residential dwelling units. Also, Uptown Newport (at 4311-4321 Jamboree Road) is currently under construction for up to 1,244 residential units, plus 11,500 square feet of neighborhood-serving retail space, and two acres of park space. The addition of these residential developments would add sensitive receptors to the airport area and the potential impact of the project of these developments must be evaluated as part of the project-specific and cumulative impact analysis for all environmental resources including air quality, health risks, noise, and traffic.
4. The health risk assessment is inadequate and does not provide any analysis of the potential increase in toxic air contaminants associated with the increase in GA flights. The HRA must evaluate the potential increase in emissions associated with the proposed project as well as other cumulative projects including DEIR 617. Further, the HRA must consider the potential increase in sensitive receptors (new residential developments) adjacent to the airport which are undergoing environmental review and should be considered in the analysis. DEIR 627 did not evaluate these as potential sensitive receptors.
5. Appendix E of the DEIR includes the Air Quality Technical Report (AQ Report) and indicates that the emission calculations were completed using the CalEEMod model. The AQ Report indicates that the CalEEMod output files are included in Attachment 2 to Appendix E. However, Attachment 2 to Appendix E was not provided on the website as part of the Draft DEIR (not in the file with the individual Appendix and not as part of the "Complete DEIR 627 Files"). Without Attachment 2, the emission factors, hours of use, type of equipment, engine load, and other related assumptions are unknown and the air quality analysis does not contain sufficient evidence to support the conclusions. Therefore, we are requesting a copy of the CalEEMod output files and an additional 30 days to review those files.
6. The DEIR has used the wrong analysis to estimate localized emissions impact. The DEIR indicates that it is acceptable to use the SCAQMD's screening tables for projects greater than 5 acres in size (see DEIR Appendix E, page 18 and DEIR Chapter 4.2 page 4.2-15). The SCAQMD recommends using the screening tables only for projects that are less than or equal to five acres. The SCAQMD states in their Localized Significance Threshold Methodology (revised July 2008)<sup>1</sup>: "It is recommended that lead agencies perform project-specific air quality modeling for larger projects." Therefore, the SCAQMD does not concur with the conclusion in the DEIR that the LST methodology can be applied to projects greater than 5 acres. Project-specific modeling is required to estimate the potential localized air

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<sup>1</sup> SCAQMD Final Localized Significance Threshold Methodology, July 2008, available at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf?sfvrsn=2>

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quality impacts as the SCAQMD's screening tables do not apply to sites greater than 5 acres. The SCAQMD in fact provides guidance for larger projects to determine localized impacts either through dispersion modeling of onsite emission sources or other appropriate SCAQMD-approved methodologies (see SCAQMD, 2008). Project-specific dispersion modeling results determine whether or not a larger project generates pollution concentrations that cause or contribute to an exceedance of the applicable ambient air quality standards or the localized significance thresholds at sensitive receptor sites. The DEIR should be revised with project-specific air quality modeling provided for localized air quality impacts.

7. Noise impacts have been underestimated. The DEIR doesn't address the fact the GA aircraft are not subject to the same requirements as commercial airlines. Since the proposed project will add GA jet aircraft, the DEIR must address the potential increase in noise during the evening and nighttime periods.

For years, our residents have been impacted by eastbound flights leaving JWA, especially when flight paths and patterns change. Noise, air pollution, traffic become more of a problem with each of these changes. We also deal with safety concerns created by lower-altitude aircraft turning eastward over our homes rather than proceeding to the waypoint over the ocean, all because of fuel efficiencies and on-time arrival objectives set by the airlines with no regard to the impact on residential neighborhoods below the flight path.

We believe that an increase in general aviation flights, without adequately addressing their environmental impact on households near the airport or under the flight paths, is unacceptable and should be remedied by a rigorous study of these issues before proceeding with any changes in general aviation traffic at John Wayne Airport.

Thank you for your consideration of CdMRA's concerns. Please provide our organization with a copy of any public notices issued in connection with this project, including the revised DEIR, Notice of Availability of the Final EIR and any public meetings.

Feel free to contact me if you have any questions.

*Debbie Stevens*

CdMRA President

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