

November 7, 2011

Patrick J. Alford, Planning Manager
City of Newport Beach, Community Development Department
3300 Newport Boulevard
P.O. Box 1768
Newport Beach, California 92658-8915

Re: Draft Environmental Impact Report (EIR) (State Clearinghouse No. 2009031061)
for the proposed Newport Banning Ranch Project

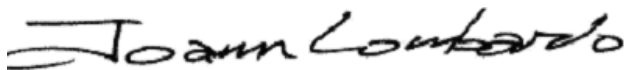
Dear Mr. Alford:

In April 2009, I submitted a comment letter in response to the project NOP. In that letter, I requested that the project EIR consider a number of environmental issues including potential traffic impacts on Clay Street and consideration of mixed-use alternatives at lower densities. None of these comments are addressed in the EIR.

The EIR does not explore a reasonable range of alternatives that could eliminate or reduce the unavoidable adverse impacts associated with the project. The alternatives offered in the EIR adhere too closely to a very narrowly defined set of objectives. CEQA does not require that the alternatives meet all the project objectives, just some of them. None of the EIR alternatives make an earnest effort to reduce project densities. The project proposal for 1,375 dwelling units is the maximum density permitted in the General Plan. Of the three reduced density alternatives, only one reduces residential density and only by 12%.

Please revise the alternatives section of the EIR to more fully explore alternatives that could reduce project impacts to the community. An alternative that would reduce residential densities by 25% to 50% would go a long way to reducing project impacts associated with land use, traffic, aesthetics and noise.

Thank you.



Joann Lombardo
2916 Clay Street
Newport Beach, CA 92663