



ORANGE COUNTY SANITATION DISTRICT

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November 7, 2011

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DEVELOPMENT
CITY OF NEWPORT BEACH

SUBJECT: Draft Environmental Impact Report for the Newport Banning Ranch Project

This letter is in response to the above-referenced Draft Environmental Impact Report (DEIR) for a project within the City of Newport Beach (City). The project site is located in the southwest portion of the City's sphere of influence adjacent to the Santa Ana River in unincorporated Orange County.

The Newport Banning Ranch Project (Project) would allow for the development of the approximately 401.1-acre site with 1,375 residential dwelling units (du); 75,000 square feet (sf) of commercial uses, a 75-room resort inn with ancillary resort uses, and approximately 51.4 gross acres for active and passive park uses including a 26.8 gross-acre public Community Park. Approximately 252.3 gross acres (approximately 63 percent) would be retained in permanent open space. The Project site's existing surface oil production activities located throughout the site would be consolidated into approximately 16.5 acres. The remaining surface oil production facilities would be abandoned/re-abandoned, remediated for development, and/or remediated and restored as natural open space. The proposed Project includes the development of a vehicular and a non-vehicular circulation system for automobiles, bicycles, and pedestrians, including a pedestrian and bicycle bridge from the Project site across West Coast Highway. The Project site is within the jurisdiction of the Orange County Sanitation District (OCSD).

The DEIR indicates the sewer service for the site will be provided by a new sewer that will connect to the OCSD Bitter Point Pump Station along Pacific Coast Highway. The DEIR indicates that the new sewer will traverse through open space area south and west of the development and connect directly to the Bitter Point Pump Station. The DEIR also indicates that the dry weather flow from the area will be 0.259 mgd.

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OCSD requests that the following items be clarified as part of the DEIR review process:

- 1) OCSD staff would like to review both the proposed sewers for the site and the existing sewers serving the existing oil field to ensure that OCSD has a clear understanding of the new sewer service connection(s) to serve the area.
- 2) The DEIR does not indicate who will own the new sewers being constructed under the Project. Please indicate the intended owners of the sewers. OCSD is the regional sewer service provider and will only allow new connections to a designated local retail agency that will be responsible for the upstream sewers.
- 3) OCSD staff suggests incorporating the trail system and public right-of-ways into the design for accessing and cleaning the new and existing sewers, proposed by the Project. The DEIR indicates that some of the new sewers will be in open space areas that could limit future access for maintenance.
- 4) The Project should include dedicated public right-of-way to allow OCSD to continue to have access to the Bitter Point Pump Station and related forcemain pipelines that are within the Project area. Exhibit 4.15-3 indicates that the existing access will be removed and replaced with open space. This includes the protection of existing OCSD easements for access and maintenance.
- 5) The Project includes a bridge across Pacific Coast Highway. OCSD also has facilities in Pacific Coast Highway. The project should include a discussion about protecting utilities in Pacific Coast Highway and include a figure for the proposed location with the location of the existing utilities.
- 6) OCSD currently operates dry-weather urban runoff facilities along the coast. Please indicate any requests to connect drainage systems to the sewer system in that area. The report should also indicate the estimated volume and water quality from the storm water system(s) discharging to the adjacent receiving water.
- 7) The DEIR indicates that 0.259 mgd will be needed for the Project. OCSD has recently completed testing of the Bitter Point Pump Station. The test results show that the station has a rated capacity of 39.43 mgd, and OCSD estimated that the total projected max peak inflow to the pump station for Year 2020 was 37.95 MGD. Thus, the pump station has sufficient capacity to serve the Project.



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- 8) The DEIR indicates additional sewer flows may be tributary to the Bitter Point Pumping Station, see Section 4.15, Page 29
An off-site connection would be required on 16th Street, adjacent to the Newport-Mesa Unified School District property. However, the connection would occur within an existing oil access road and would not result in significant environmental effects beyond those addressed as part of this EIR.

If additional flows will be directed or redirected to the Bitter Point Pump Station, this should be identified and quantified prior to a complete determination of the sewer capacity availability as indicated in item 6 above.

- 9) OCSD requests the landscaping for the Project area be designed to limit the views to OCSD Treatment Plant No. 2, west across the river and direct the views towards the ocean. There are lights and noises at night that are necessary to operate the treatment plant during normal and emergency operations.
- 10) OCSD requests that the Project include mitigation offsets for the future use of the Public Right of Way from the terminus of 19th Street to the Santa Ana River. The County of Orange shows this as a future road and OCSD would also like to consider this alignment for a future sewer.
- 11) OCSD requests that baseline odor studies are done at the site to determine the levels and types of odors that are naturally generated at the site. The site has several potentially odorous sources that can be confused with the adjacent treatment plant and sewerage pumping station. This baseline data will be used by OCSD to determine the nature of any future odor complaints from residents and businesses within the Project area. The baseline data analysis should then be included in any final environmental documents as part of the environmental setting. OCSD staff is available for consultation of how to perform these studies.
- 12) Also, please note that any construction dewatering operations that involve discharges to the local or regional sanitary sewer system must be permitted by OCSD prior to discharges. OCSD staff will need to review/approve the water quality of any discharges and the measures necessary to eliminate materials like sands, silts, and other regulated compounds prior to discharge to the sanitary sewer system.



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- 13) Section 4.15, Page 27, should be updated to 104 mgd for reclamation. "The OCSD also provides up to ~~40~~ 104 mgd of treated wastewater to the OCWD for further processing for landscape irrigation and injection into the groundwater seawater intrusion barrier."
- 14) Finally, OCSD is currently investigating a sewer deficiency in the OCSD sewer system in Fairview Boulevard in the City of Costa Mesa. The current efforts include investigating alternative alignments within the Project area. A potentially new sewer would redirect flows from southwest Costa Mesa and an area of Newport that is adjacent to the Project site, to relieve the trunk sewers in Fairview Boulevard. OCSD continues to work with the City of Newport Beach and Costa Mesa Sanitary District on this effort because it will allow them to abandon a number of sewage pumping stations. OCSD staff recommends that any alignments being considered in the Banning Ranch Project area continue to be closely coordinated between the three agencies and within the Departments within those agencies.

Thank you for the opportunity to comment on the proposed development. If you have any questions regarding sewer connection fees, please contact Wendy Smith at (714) 593-7880. For planning issues regarding this project, please contact me at (714) 593-7335.

A handwritten signature in black ink, appearing to read "JL Burror", with a long, sweeping underline.

James L Burror, Jr., P.E.
Engineering Supervisor

JB:sa
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