

Mr. Patrick Alford, Planning Manager
City of Newport Beach
3300 Newport Boulevard
Newport Beach, California 92663



NOTE: I object to the approval of the Banning Ranch DEIR in its present form. The comments below and all references contained therein are hereby incorporated into the official record of proceedings of this project and its successors.

Dear Mr. Alford:

I'm submitting additional comments to the Banning Ranch DEIR on the Air Quality section.

On page 4.10-11, it says that the Costa Mesa monitoring station does not monitor PM10 and PM2.5, so the data was supplemented from the Mission Viejo Station (Saddleback Valley). It also says that data from 2008 to 2010 from these stations are summarized in Table 4.10-2 and those data show exceedances of the federal 8-hour O3 standard in 2008 and the State 8-hour O3 standard in 2008 and 2009 at the Costa Mesa Monitoring Station. At the Mission Viejo Monitoring Station, the State PM10 24-hour and annual standards were exceeded in 2009 and the federal PM2.5 24-hour standard was exceeded in 2009.

How is the monitoring done and where? If the monitoring is done at the station location, how can a station in Mission Viejo accurately measure TACs at the Project Site on Banning Ranch?

Also, what time of day were the 2008 and 2009 samples taken and what were the weather and wind conditions? It's known that ozone levels are higher in the afternoon, but how does weather impact concentrations of low-level pollutants like ozone?

Table 4.10-2 shows exceedances of O3 in 2008 and 2009 and exceedances of PM10 and PM2.5 in 2009. Is the current station monitoring being done in accordance with the new national one-hour standards for Nitrogen Dioxide that require monitors at locations where maximum NO2 concentrations are expected to occur, i.e. within 50 meters of major roadways? Has the computer modeling to estimate future emissions been done with data from monitoring stations that meet this standard?

See the following clarifications from the EPA and the Federal Register:

"Strengthened National Standards for Nitrogen Dioxide
<http://www.epa.gov/oaqps001/nitrogenoxides/actions.html#jul11>

January 22, 2010 – The Environmental Protection Agency strengthened its national ambient air quality standards (NAAQS) for nitrogen dioxide. The new standard will protect public health, including the health of sensitive populations - people with asthma, children, and the elderly.”

“[Final Rule \(PDF\)](#) (65pp, 418k) - Federal Register - Feb 9, 2010
<http://www.epa.gov/ttn/naaqs/standards/nox/fr/20100209.pdf>

Specifically, EPA is establishing a new 1-hour standard at a level of 100 ppb, based on the 3-year average of the 98th percentile of the yearly distribution of 1-hour daily maximum concentrations, to supplement the existing annual standard. **EPA is also establishing requirements for an NO2 monitoring network that will include monitors at locations where maximum NO2 concentrations are expected to occur, including within 50 meters of major roadways, as well as monitors sited to measure the area-wide NO2 concentrations that occur more broadly across communities.”**

Also, the 2009 9th Conference on Air Quality Modeling raised concerns about the proximity of monitoring stations to locations where maximum pollution is expected to occur:

“9th Conference on Air Quality Modeling – A&WMA AB-3
Comments on AERMOD Study

http://www.epa.gov/scram001/9thmodconf/awma9thmodelingconference_aermod_schewe.pdf

Modeling of Roadway Sources

- Short-term NO2 ,PM10 and PM2.5 concentrations are dominated by mobile source impacts near major roadways
- Roadways are characterized by enhanced turbulence and low wind speeds generated by traffic itself
- Review of data from tracer studies and adjustments to AERMOD modeling procedures for roadway is an important issue for EPA to pursue
- **Problems - few long-term monitors near roadways & quantification of emissions, especially PM, is questionable”**

Do the monitoring stations used for the data in this DEIR address the above concerns about proximity and conform to the new national standards for NO2? If not, how can it be held that the analyses of pollutant emissions are accurate and reflect their true impact?

I appreciate your attention to these areas of concern and I look forward to your response.

Thank you in advance,



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