

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



Dear Mr. Alford:

In the Air Quality section of the Banning Ranch DEIR, I was struck by the significance of Threshold 4.10-3, not just because the Project's criteria pollutant emissions will negatively impact Newport Beach and surrounding communities such as Costa Mesa, but because they will impact attainment issues for the entire Southern California basin (SoCAB).

Threshold 4.10-3 reads as follows:

"Threshold 4.10-3 Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable NAAQS or CAAQS (including releasing emissions that exceed quantitative thresholds for ozone precursors)?

The Project region is in nonattainment for O₃, NO₂, PM₁₀, and PM_{2.5}. As described above, after 2020, implementation of the Project could result in long-term emissions of the O₃ precursor VOC and short-term emissions of the O₃ precursor NO_x, which would exceed the SCAQMD mass emissions thresholds for those pollutants. Long-term NO_x emissions would not exceed the threshold but are forecasted to be just less than the threshold. Therefore, emissions of VOC and NO_x would be cumulatively considerable and the proposed Project would have a significant cumulative air quality impact."

If the Project does not meet Threshold 4.10-3, then perhaps the Project Applicant should go back to the drawing board and rethink the design. This is not acceptable in terms of health risks or quality of life to either the existing residents or to the new ones who will be buying homes from the Project Applicant. Perhaps the Project is too ambitious in scale? Perhaps the planned population density is too great and will lead to overcrowding?

Is the development, no matter how valuable the land or profitable the enterprise, worth adversely impacting the lives and the health of so many Newport Beach residents? Are extra tax revenues for the city worth such impacts? Are they worth the potential of law suits from the health risks associated with the criteria pollutants, which include cancer and lung disease? There are too many significant and unavoidable impacts with this Project and if these pollutants and polluting conditions really cannot be mitigated, then isn't it time to consider that the Project has not been well envisioned or well planned, especially given that Newport Beach is already heavily over-populated with traffic and visitors whenever the mercury rises above seventy degrees, and freeway and local traffic to the beach will also expose the city of Costa Mesa to traffic congestion and excessive noise and air pollution?

I do not have email and would appreciate a response by regular mail.

Thank you,

A handwritten signature in blue ink that reads "Mary Lee".

Mary Lee
7 Summerwind Court
Newport Beach, CA 92663