

November 8, 2011

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

RE: DEIR Newport Banning Ranch Project No 2009031061

Dear Mr. Alford:

Please accept these comments in response to Draft Environmental Impact Report (DEIR), for the Newport Banning Ranch Project No 2009031061. I am an ecologist and have conducted numerous native and non-native vegetation surveys in Orange County over the past four and a half years and am proficient in Orange County plant identification.

I agree with inadequacies and omissions pointed out in response to the DEIR from Robert Hamilton, Barry Nerhus, Scott Thomas, and Terry Welsh. Another example of such inadequacies is listed below.

Section 4.6.3 of the dEIR states that one species of concern, southern tarplant (*Centromadia parryi* ssp. *australis*), flowers in late summer and early fall, but "focused plant surveys" for southern tarplant were not completed during the tarplant flowering season of 2007, 2008, or 2009. It is difficult to, first, find the species and, second, discern specific species from one another without the flowering parts. More focused plant surveys should be conducted during the actual flowering season of the southern tarplant in successive years to create an accurate and acceptable map of tarplant cover.

This is only one in a number of examples of failures in the DEIR to completely consider the biological resources on the Banning Ranch property. Without complete knowledge of the full extent of these resources, the full impact of the proposal cannot be known.

I appreciate the opportunity to respond to the DEIR.

Thank you for your time,
Margaret Royall
Ecologist
Concerned citizen