

# City of Huntington Beach

CALIFORNIA 92648

## DEPARTMENT OF PLANNING AND BUILDING www.huntingtonbeachca.gov

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October 31, 2011

Patrick Alford, Planning Manager City of Newport Beach Community Development Department 3300 Newport Blvd. Newport Beach, CA 92658-8915 COMMUNITY
NOV 1 4 2011

OF NEWPORT BERGY

Subject: Draft EIR - Newport Banning Ranch Project

Dear Mr. Alford:

The City of Huntington Beach has reviewed the Draft Environmental Impact Report (EIR) for the Newport Banning Ranch Project and recommends that the following comments be addressed in the Final EIR/Response to Comments that will be prepared for this project.

#### Recreation

• Section 4.8 of the Draft EIR lists City of Huntington Beach parks within two miles of the project site. Two City parks, Gisler and Bauer, were left off the list. Please see the enclosed map for locations of the two parks. In addition, it should be noted that Bauer Park is a newly constructed park and is not yet open to the public.

#### Traffic and Circulation

The following comments refer to Section 4.9 of the Draft EIR as well as Appendix F: Traffic Impact Analysis.

- The study intersections in the City of Huntington Beach require an assumption of 1,700 vehicles per hour per lane (vphpl) for ICU analysis. Although Section 4.9 of the Draft EIR states that 1,700 vphpl was assumed for the City of Huntington Beach study intersections, it appears that a value of 1,600 vphpl was used for the ICU worksheets in Appendix F. Please clarify and, if necessary, correct this discrepancy.
- The draft EIR and Traffic Impact Analysis (TIA) identify three City of Huntington Beach intersections as deficient under various scenarios for the General Plan build-out analysis: Pacific Coast Highway/Magnolia Street, Brookhurst Street/Hamilton Avenue, and Pacific Coast Highway/Brookhurst Street.

- Section 4.9 of the Draft EIR and TIA indicate that the Pacific Coast Highway (PCH)/Magnolia Street intersection would be deficient (LOS F) in the PM peak hour under the General Plan Build-out Without Project analysis. However, the current Huntington Beach Traffic Model forecasts this intersection to operate at LOS C during the PM peak hour under the General Plan.
  - Therefore, the traffic analysis under the following scenarios would not be expected to deteriorate to LOS F when accounting for project trip generation: General Plan Build-out with Project; General Plan Build-out Bluff Road Alternative (Alternative C); General Plan Build-out Open Space Alternative with Bluff Road (Alternative B); and General Plan Build-out Open Space Alternative without Bluff Road (Alternative B). Additionally, the analysis forecasts the intersection to operate at LOS F during the PM peak hour under the General Plan Build-out With Project and Full MPAH Network scenario. However, with implementation of the MPAH, it appears that more project trips are assigned at the critical movements than would be expected considering the alternative routes available. Please clarify these issues in the Final EIR.
- Under the General Plan Build-out With Project and 19<sup>th</sup> Street Bridge and General Plan Build-out Bluff Road Alternative with 19<sup>th</sup> Street Bridge (Alternative C) scenarios, a disproportionate number of southbound (PCH) left turns has been assigned at PCH/Magnolia than at PCH/Brookhurst affecting the LOS results. Please address why the assigned trips are not more evenly distributed and/or correct the data and analysis as appropriate. This same issue occurs at the Brookhurst/Hamilton intersection, which was assigned a disproportionate number of left turns compared to the Brookhurst/19<sup>th</sup> Street intersection during the PM peak hour.

### Cumulative Impact Analysis

- Exhibit 5-4 incorrectly denotes the location of several City of Huntington Beach cumulative projects (see attached mark-up). Please correct in the Final EIR.
- Table 5-2 should be corrected as follows:
  - o Huntington Beach Downtown Specific Plan Update: discretionary actions also included Zoning Map and Zoning Text Amendments;
  - Newland Street Residential: The project has been completed is under construction. Please note that this project is now commonly referred to as Pacific Shores.
  - o Newland Street Widening: The project is under construction has been completed.
- Table 5-3 incorrectly denotes the significance of impacts for several City of Huntington Beach Cumulative Projects that are listed. For instance, the Beach and Edinger Corridors Specific Plan Program EIR did not conclude Significant and Unavoidable impacts due to Greenhouse Gases as indicated in the table. However, a Significant and Unavoidable impacts was concluded for cumulative population impacts, which is not specified in the table. Additionally, The Ridge project included biological mitigation measures; however,

the table lists the project as less than significant (assuming no mitigation per the write-up on page 5-23 of the Draft EIR). Please verify each of the Huntington Beach projects in the table with the project's impacts and correct the table as necessary. You may find most of the environmental documents at the following link: http://www.huntingtonbeachca.gov/government/departments/Planning/. If you need assistance, please feel free to contact me.

Thank you for the opportunity to comment on the Draft EIR for the proposed project. The City of Huntington Beach looks forward to reviewing the Final EIR when it becomes available.

Sincerely,

Jennifer Villasenor Senior Planner

Cc: Scott Hess, Planning and Building Director

Mary Beth Broeren, Planning Manager



