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August 26, 2015

California Coastal Commission
45 Fremont Street,
Suite 2000
San Francisco, CA 94105

RE: Banning Ranch Proposal, Newport Beach

Honorable Chair Kinsey, Commissioners and Staff:

Friends of Harbors, Beaches, and Parks (FHBP) is a regional non-profit organization that works to protect the natural lands, waterways, and beaches of Orange County. We have numerous concerns with the proposed project of the Banning Ranch property in the City of Newport Beach. These concerns include:

- Banning Ranch is the only remaining large unprotected coastal open space in Orange County. If it is developed, it is gone forever.
- 2.5 million cubic yards of soil are proposed to be excavated and stockpiled to prepare the land for development, destroying a unique coastal environment and exposing the public to unknown levels of oil field contaminants.
- The project proposes destruction of environmentally sensitive habitat areas, threatened wildlife species, coastal wetlands and vernal pools— that are all considered irreplaceable by the Coastal Act.
- The proposed project's water demands will place a significant burden on scarce water supplies, increasing groundwater withdrawals.
- The Water Supply Assessment Report is flawed and outdated by its own admission.
- Traffic and emissions will be significantly increased with 15,000+ additional vehicle daily trips on our roads that have not been upgraded for such congestion.
- The air pollution from the project construction and the long-term traffic loading will exceed state standards.
- The noise impacts from traffic and other sources from the coastal bluff will be double allowable noise thresholds and extend beyond the project site.
- The project is far from any significant existing or proposed transit facilities thus contributing considerably to the Greenhouse Gas Inventory, accelerating global climate change and rising sea levels.



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Too many of the above impacts exceed regulatory standards and are designated "significant and unavoidable" in the Newport Banning Ranch Environmental Impact Report (<http://www.newportbeachca.gov/index.aspx?page=2096>).

Despite the City's own General Plan, approved by the voters in 2006, which states in the Land Use Element "Prioritize the acquisition of Banning Ranch as an open space amenity for the community and region -----", and despite the number and severity of these impacts, the Newport Beach City Council approved the proposed Banning Ranch project in July of 2012, resorting to a "Statement of Overriding Considerations" to rationalize away the "significant and unavoidable" impacts cited throughout the EIR. These impacts would put the health and safety of the public at risk—and will result in the destruction of the rare and finite natural resources at this unique coastal location.

To conclude, FHBP urges the Commission to reject the proposed development at Banning Ranch. We found that there is not a public benefit from development at this location, while the value of a preservation-focused use of the property would be extremely beneficial and popular to the surrounding communities and the region. This land is situated at the Pacific Ocean terminus of the Santa Ana River which has recently been recognized as a statewide resource through the formation of the Santa Ana River Conservancy. Through concerted action by the State's Coastal Commission and Coastal Conservancy along with all other parties of interest including the 17 agency Southern California Wetlands Recovery Project, the Banning Ranch in its entirety should be valued as the one remaining opportunity for a coastal public resource. We ask your Commission to do the right thing by rejecting this current project in its entirety.

Sincerely,

Jean H. Watt
President