

November 8, 2011

City of Newport Beach
3300 Newport Boulevard
Newport Beach, California 92663

Attention: Patrick Alford
palford@newportbeachca.gov



Dear Mr. Alford:

The calculations for the Cancer Burden referred to on pages 4.10-31 and 32 of the Air Quality second of the DEIR appear to be based on incorrect distances of the nearest receptors to the Project fence line. The Tier 1 analysis under "Threshold 4.10-4 refers to off-site receptors 100 meters from the Project fence line. One hundred meters is 328 feet. What happens to people who are closer than 100 meters from the Project fence line?

Based on the DEIR's "Community Transitions and Interface Key Map," which includes a series of exhibits that depict the distances between Newport Crest residences "immediately contiguous to the Project" and the Community Park and Bluff Road, the distances of the nearest receptors to the Project fence line will be much closer than 100 meters or 328 feet. Exhibit 4.1-2g "Central Community Park Interface with Newport Crest" Section E1-E1 depicts the interface of Bluff Road with the most northwestern portion of the Newport Crest complex. According to Section E1-E1 the narrowest point of Community Park separating Newport Crest residences from Bluff Road is twenty-two feet (22 ft).

Virtually all of the 52 perimeter courtyards are within 328 feet of the Project fence line, which means that this will impact between 300 to 400 people, if just two people live in each condo. None of these people are included in the Tier 1 analysis. It also appears that Carden Hall School may be within the 100 meter distance. The analysis only applies to people beyond 100 meters. What is the cancer burden for those who are inside the boundaries?

On page 4.10-31, what does "provide reductions of cancer risk at 40 percent of the fence line receptors" mean? Also, "reduction of chronic non-cancer risk at 29 percent of the receptors?" How does this apply to the hundreds within the 100-meter distance?

On page 4.10-31 and 32, under "Cancer Burden," it refers to 19 census tracts with a combined population of just over 86,000 people. It then says that if everyone in the tracts was exposed to a 4 in 1 million incremental cancer risk, the cancer burden would be 0.34, which is less than the SCAQMD significance threshold of 0.5."

What conditions would create a 4 in 1 million incremental cancer risk? It seems the cancer burden at 0.34 is uncomfortably close to the SCAQMD significance threshold of 0.5. At 0.34, how many people of the 86,000 could be expected to get cancer? And what about the Newport Crest residents who are inside the 100-meter boundary used for the calculations? How many of them could be expected to get cancer?

Thank you for taking the time to review my letter. In your response, would you please advise if these calculations will be redone using figures that actually reflect the distances of the nearest receptors from the Project fence line?

Yours truly,



Mr. and Mrs. Don Bruner
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