



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178

(909) 396-2000 • www.aqmd.gov

E-Mailed: December 12, 2013
agulick@templecity.us

December 12, 2013

Mr. Adam Gulick
9701 Las Tunas Drive
Temple City, CA 91780

Review of the Draft Mitigated Negative Declaration (Draft MND) for the Proposed Olsen Project

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The comments in this letter are based on a cursory review of the Draft MND as we only received notice of the document after conversation with Mr. Paul Diebel in early December. The letter itself replicates comments we sent to Mr. Diebel in an email on December 9, 2013 and in previous phone calls.

SCAQMD staff notes that the Health Risk Assessment (HRA) conducted to evaluate potential impacts from diesel locomotives travelling along a nearby rail line uses a number of assumptions that may not provide an accurate assessment of project specific impacts. In particular, the HRA compares risks uses an analysis conducted for another project, the Guasti Specific Plan, to determine potential impacts at this site. The Guasti HRA was not available for review in the documents made available online so SCAQMD staff cannot verify the validity of this comparison. This simplifying assumption may either overestimate or underestimate impacts at the proposed project site. Key parameters that would be needed to determine site-specific impacts include the number of locomotives per train, their notch setting while passing the site, locomotive type (switcher vs. line-haul), etc.

In addition, the HRA assumed an exposure period of only 30 years. Although the Draft MND may conclude that this exposure duration may be more applicable to the project site than the more typical 70 year assumption used for risk assessments, SCAQMD thresholds are based on 70 year exposures. As SCAQMD thresholds were developed in conjunction with our recommended HRA methodologies, if the lead agency chooses to use an alternative methodology then the lead agency should also develop an alternative threshold based on substantial evidence, consistent with CEQA guidelines 15064.7.

Finally, while filtration has been recommended as a mitigation measure, its effectiveness has not been quantified in the Draft MND. If impacts are found to be significant, the Final MND should quantify how these impacts could be reduced to a less than significant level, including considering how the mitigation can be implemented and enforced in the long term.

Please provide SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. Further, staff is available to work with the lead agency to address these issues and any other air quality questions that may arise. Please contact me at (909) 396-3244, if you have any questions regarding the enclosed comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Ian V. MacMillan".

Ian MacMillan

Program Supervisor, CEQA Inter-Governmental Review
Planning, Rule Development & Area Sources

LAC131205-04
Control Number

Cc: Paul Diebel