

From: Raoul Renaud
To: Docket Optical System
Date: 9/22/2008 8:38 AM
Subject: Fwd: I don't believe hra meets this criteria nor does the health analysis in the FSA

please docket 07-AFC-4

Raoul A. Renaud
Hearing Adviser II
California Energy Commission
1516 9th Street
Sacramento, CA 95814
(916)651-2020

DOCKET	
07-AFC-4	
DATE	SEP 22 2008
RECD.	SEP 22 2008

CONFIDENTIALITY NOTICE: This message and any attachments are confidential and privileged. They are intended for the sole use of the addressee.

>>> THERESA ACERRO <thacerro@yahoo.com> 9/19/2008 8:59 PM >>>

--- On Fri, 9/19/08, Rajiv Bhatia <Rajiv.Bhatia@sfdph.org> wrote:

From: Rajiv Bhatia <Rajiv.Bhatia@sfdph.org>
Subject: Re: Air Quality info referred by Tanya from HEAC
To: thacerro@yahoo.com
Cc: jch@humanimpact.org
Date: Friday, September 19, 2008, 3:24 PM

Theresa

The 2005 Bakersfield Citizens Decisions specifically required CEQA analysis to include analysis of health effects related to air pollutants.

Adequate significance determination under ceqa cannot rely only on state / federal standards under the 2002 decision on Communities for a Better Environment, et al. v. California Resources Agency,

A health risk assessment in this case requires at minimum an analysis of air pollutant concentrations using a dispersion model and then a HRA based on those concentrations. The concentration response (dose-response) function for particulate matter does not have a lower threshold, meaning that it operates below the regulatory threshold.

The air board (CARB) published a consensus report in may 2008 that says that every 1 ug/m3 increase in PM 2.5 results in a 1% increase in pre-mature mortality from all causes. CARB also says these effects occur below the state PM 2.5 threshold.

Some updated information on air quality modeling and health assessments is in a guidance document on our website at

<http://www.sfdph.org/dph/EH/Air/default.asp>

Happy to speak to you more. I'm also copying Jonathan Heller a colleague at the non-profit human impact partners which also works on health impact assessments.

Rajiv

