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Date: September 14, 2018 at 10:25:11 AM PDT
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Subject: Misrepresentations in SJVAPCD Draft 2018 Plan for PM2.5

September 14, 2018

Samir Sheikh <Samir.Sheikh@valleyair.org>
Jaime Holt <Jaime.Holt@valleyair.org>
San Joaquin Valley Air Pollution Control District Leadership

Re: Misrepresentations in SJVAPCD Draft 2018 Plan for PM2.5

Dear SJVAPCD Leadership,

I am writing to point out very inaccurate statements in the SJVAPCD *Draft 2018 Plan for 1997, 2006, and 2012 PM2.5 Standards* (<http://www.valleyair.org/pmplans/>). I am an accomplished epidemiologist and physicist with a long academic career at UCLA. Since 2005 have published peer-reviewed evidence that challenges the validity of the EPA PM2.5 NAAQS, which is the focus of the *Draft 2018 Plan*. I have shown that PM2.5 does not cause premature deaths in California or the San Joaquin Valley (SJV), contrary to the claims of CARB and an agricultural economist named Pope. In 2017 I published a major reanalysis that provides strong evidence that PM2.5 does not cause premature deaths in the US or California. I have identified serious errors in the 1995 *AJRCCM* article by Pope and the American Cancer Society that played a primary role in the establishment of the 1997 PM2.5 NAAQS ([https://yosemite.epa.gov/sab/sabproduct.nsf/D41456F68B9F91658525829D004DBD73/\\$File/88483770.pdf](https://yosemite.epa.gov/sab/sabproduct.nsf/D41456F68B9F91658525829D004DBD73/$File/88483770.pdf)). My evidence, along with much additional evidence from other accomplished experts, challenges the validity of and justification for compliance with the 1997, 2006, and 2012 PM2.5 NAAQS. Since 2008 I have presented much of this evidence to the CARB Chair and top CARB scientists like 'Dr.' Hien T. Tran. Unfortunately, CARB has ignored and suppressed my evidence and other similar evidence and has NEVER presented it to the SJVAPCD Board and Citizens Advisory Committee (CAC).

I cite two of the many inaccurate statements in the 1,342-page SJVAPCD *Draft 2018 Plan for the 1997, 2006, and 2012 PM2.5 Standards* (<http://www.valleyair.org/pmplans/documents/2018/pm-plan/2018-PM-25-Plan.pdf>). Section 3.2 Health Impacts of PM2.5 on page 51 inaccurately states: "Many studies have quantified and documented the health benefits of attaining the U.S. Environmental Protection Agency (EPA) air quality standards for PM." The Supplement to the State SIP Strategy on page 1290 inaccurately states: "The health and economic impacts of exposure to elevated levels of ozone and PM2.5 in California are considerable and meeting federal standards will pay substantial dividends in terms of reducing costs associated with emergency room visits and hospitalization for heart and lung related causes, lost work and school days and reducing incidences of asthma. Most critically, exposure to PM2.5 and ozone is also associated with increased risk of premature mortality, which has been estimated to contribute to 7,500 premature deaths each year in California." These statements are inaccurate and inappropriate because they DO NOT APPLY to the SJV, which has been known for 20 years to be at very low risk for PM2.5 health effects.

Some of my early findings documenting the healthiness of the SJV regarding PM2.5 are summarized in the November 16, 2009 "legitimacy of CARB" letter by former CARB and SJVAPCD Board Member John

G. Telles, MD, of Fresno (<http://www.scientificintegrityinstitute.org/Telles111609.pdf>) and the October 10, 2010 “investigate CARB for fraud” Bakersfield Californian column by Lois Henry (<http://scientificintegrityinstitute.org/Henry101010.pdf>). Air quality in the SJV, California, and the US is at healthy levels, as shown in EPA Maps of PM2.5 and Ozone in the US (<https://www.airnow.gov/>). Indeed, WHO World Maps (see below) show that unhealthy levels of PM2.5 are in China, India, Africa, and Europe, not in the US (<http://www.who.int/airpollution/data/en/>).

The next version of the *Draft Plan for PM2.5* must include the extensive evidence of the flaws in the PM2.5 NAAQS and must emphasize the healthiness of the SJV regarding PM2.5. The SJVAPCD Board and CAC must fully assess this evidence before any further PM2.5 regulations are considered or implemented in the SJV. I request that SJVAPCD Leadership invite me and other highly qualified experts to explain to the SJVAPCD Board and CAC all the flaws with the PM2.5 NAAQS, the *Draft 2018 Plan for PM2.5*, and CARB claims about PM2.5. Please respond promptly to my request. The SJV is too important to the economy of California and the US to continue to be adversely impacted by multi-billion-dollar PM2.5 regulations that are scientifically and economically unjustified.

Thank you very much for your consideration.

Sincerely yours,

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World Health Organization Map 2015 Annual Mean Ambient PM_{2.5} (µg/m³)

