

**Misrepresentation and Exaggeration of Health Impacts  
in South Coast Air Quality Management District  
Revised Draft 2012 Air Quality Management Plan Appendix I Health Effects  
and  
Request for California Health and Safety Code Section 40471 (b) Hearing on  
Health Impacts of Particulate Matter Air Pollution in South Coast Air Basin**

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- 1) In spite of my repeated submissions to AQMD since 2008 of overwhelming evidence of no mortality impacts, including the evidence in my August 30, 2012 Criticism of the Draft 2012 AQMP (<http://scientificintegrityinstitute.org/AQMP083012.pdf>), the September 7, 2012 Revised Draft AQMP Appendix I Health Effects continues to seriously misrepresent and exaggerate the mortality impacts of criteria pollutants, like particulate matter, in the South Coast Air Basin (<http://www.aqmd.gov/aqmp/2012aqmp/RevisedDraft/AppI.pdf>).
- 2) Since 2000, overwhelming epidemiologic evidence that fine particulate matter is not killing Californians has been published by 26 accomplished doctoral level scientists (Ph.D. or M.D.), including myself. Since 2008, extensive written and/or verbal comments by 16 doctoral level critics, including myself, have been submitted to US EPA, CARB, and/or AQMD and these comments strongly criticize the way the California-specific evidence has been characterized by the three regulatory agencies. The names of the scientists and critics are listed on the next page.
- 3) The 2012 AQMP (<http://www.aqmd.gov/aqmp/2012aqmp/index.htm>) does not comply with California Health and Safety Code (CHSC) Section 40471 (b): “On or before December 31, 2001, and every three years thereafter, as part of the preparation of the air quality management plan revisions, the south coast district board, in conjunction with a public health organization or agency, shall prepare a report on the health impacts of particulate matter air pollution in the South Coast Air Basin. The south coast district board shall submit its report to the advisory council appointed pursuant to Section 40428 for review and comment. The advisory council shall undertake peer review concerning the report prior to its finalization and public release. The south coast district board shall hold public hearings concerning the report and the peer review, and shall append to the report any additional material or information that results from the peer review and public hearings.” (<http://www.leginfo.ca.gov/cgi-bin/displaycode?section=hsc&group=40001-41000&file=40460-40471>).
- 4) Before the 2012 AQMP is finalized and approved, the AQMD Governing Board must hold a public hearing on “the report and the peer review” regarding “the health impacts of particulate matter air pollution in the South Coast Air Basin,” as required by CHSC Section 40471 (b).

Twenty-Six Doctoral Level Scientists Who Have Published Epidemiologic Findings Since 2000 That Show NO Relationship Between PM2.5 and Total Mortality in California

David E. Abbey, Ph.D., Loma Linda University (2000)  
Michal Abrahamowicz, Ph.D., McGill University (2000)  
Leslie Bernstein, Ph.D., City of Hope National Medical Center (2011)  
Richard T. Burnett, Ph.D., Health Canada, Canada (2000, 2011)  
Ellen T. Chang, Sc.D., Cancer Prevention Institute of California (2011)  
George Christakos, Ph.D., San Diego State University (2011)  
Francesca Dominici, Ph.D., Harvard University (2008)  
James E. Enstrom, Ph.D., University of California, Los Angeles (2005, 2006, 2010)  
Mark S. Goldberg, Ph.D., University of Quebec (2000)  
Katherine D. Henderson, Ph.D., Cancer Prevention Institute of California (2011)  
Edward Hughes, Ph.D., Edward Hughes Consulting, Canada (2011)  
Michael Jerrett, Ph.D., University of California Berkeley (2000, 2010, 2011)  
Daniel Krewski, Ph.D., University of Ottawa, Canada (2000, 2010, 2011)  
Michael J. Lipsett, M.D., California Department of Public Health (2011)  
Aidan McDermott, Ph.D., Johns Hopkins University (2008)  
William F. McDonnell, Ph.D., US Environmental Protection Agency (2000)  
Bart D. Ostro, Ph.D., California Office of Environmental Health Hazard Assessment (2011)  
C. Arden Pope III, Ph.D., Brigham Young University (2011)  
Peggy J. Reynolds, Ph.D., Cancer Prevention Institute of California (2011)  
Jonathan M. Samet, M.D., University of Southern California (2008)  
Yuanli Shi, M.D., University of Ottawa, Canada (2011)  
Jack Siemiatyck, Ph.D., University of Quebec (2000)  
Michael J. Thun, M.D., American Cancer Society (2011)  
George D. Thurston, Ph.D., New York University (2011)  
Warren H. White, Ph.D., Washington University (2000)  
Scott L. Zeger, Ph.D., Johns Hopkins University (2008)

Sixteen Doctoral Level Critics Who Have Criticized Since 2008 the Relationship Between PM2.5 and Total Mortality in California as Characterized by US EPA, CARB, and AQMD

William M. Briggs, Ph.D., Statistician, New York City & Cornell University  
John D. Dunn, M.D., J.D., Physician & Attorney, Darnall Army Medical Center, Texas  
James E. Enstrom, Ph.D., Epidemiologist, University of California, Los Angeles  
Anthony Fucaloro, Ph.D., Chemist, Claremont McKenna College, California  
Gordon J. Fulks, Ph.D., Astrophysicist, Oregon  
Michael E. Ginevan, Ph.D., Statistician, M.E. Ginevan & Associates, Maryland  
Thomas W. Hesterberg, Ph.D., Toxicologist, Navistar, Illinois  
Frederick W. Lipfert, Ph.D., Environmental Scientist, New York  
Geoffrey C. Kabat, Ph.D., Epidemiologist, Einstein College of Medicine, New York  
Matthew A. Malkan, Ph.D., Astrophysicist, University of California, Los Angeles  
Roger O. McClellan, D.V.M., Toxicologist, New Mexico  
Henry I. Miller, M.D., Physician, Hoover Institution, Stanford University  
Suresh H. Moolgavkar, M.D., Ph.D., Epidemiologist, University of Washington  
D. Warner North, Ph.D., Risk Analyst, NorthWorks & Stanford University  
Robert F. Phalen, Ph.D., Toxicologist, University of California, Irvine  
S. Stanley Young, Ph.D., Statistician, National Institute of Statistical Sciences