

**Misrepresentation and Exaggeration of Health Impacts
in South Coast Air Quality Management District
Revised Draft 2012 AQMP Appendix I Health Effects Version 2**

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 extensive and repeated criticism of the scientific and public health basis for the 2012 AQMD Air Quality Management Plan (AQMP), including my September 28, 2012 American Statistical Association JSM Proceedings Paper “Particulate Matter is Not Killing Californians” (<http://www.scientificintegrityinstitute.org/ASA092812.pdf>), the October 9, 2012 Revised Draft AQMP Appendix I Health Effects Version 2 continues to seriously misrepresent and exaggerate the health impacts of particulate matter in the South Coast Air Basin (SCAB) (<http://www.aqmd.gov/aqmp/2012aqmp/RevisedDraft/AppI-v2.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. This evidence has not been properly recognized or used by AQMD in its assessment of the health impacts of particulate matter in the SCAB since 2000.
- 3) Since 2001 the Appendix I Health Effects for the AQMP has never complied with various clearly written provisions of California Health and Safety Code (CHSC) Section 40471 (b) (<http://www.leginfo.ca.gov/cgi-bin/displaycode?section=hsc&group=40001-41000&file=40460-40471>). In particular, Appendix I does not focus on “the health impacts of particulate matter air pollution in the South Coast Air Basin;” Appendix I has not been prepared “in conjunction with a public health organization or agency;” the AQMD Advisory Council did not “undertake peer review concerning the report,” using a standard definition of peer review; the AQMD Governing Board has not complied with the requirement to “hold public hearings concerning the report and the peer review.”
- 4) Before the 2012 AQMP is finalized and approved, the AQMD must be required to comply with all provisions of CHSC Section 40471 (b). In particular, the AQMD Governing Board must hold at least one public hearing that focuses on “the report and the peer review” regarding “the health impacts of particulate matter air pollution in the South Coast Air Basin.”