


Visit the new Regulations.gov Beta site today at <https://beta.regulations.gov>



Your comment was submitted successfully!

The **Environmental Protection Agency (EPA)** Proposed Rule: [Strengthening Transparency in Regulatory Science](#)

For related information, [Open Docket Folder](#) 

3 Your Receipt

Your Comment Tracking Number: **1k4-9fmj-jgzf**

Your comment may be viewable on Regulations.gov once the agency has reviewed it. This process is dependent on agency public submission policies/procedures and processing times. Use your tracking number to find out the status of your comment.

[Email Receipt](#)



Your comment:

Comment:

March 18, 2020

To:

Docket ID No. EPA-HQ-2018-01-0259; FRL-10004-72-ORD
Supplemental Proposed Rule "Strengthening Transparency in Regulatory Science"
<https://www.regulations.gov/comment?D=EPA-HQ-OA-2018-0259-9322>
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

From:

James E. Enstrom, Ph.D., M.P.H.
UCLA and Scientific Integrity Institute
907 Westwood Boulevard #200
Los Angeles, CA 90024
<http://www.scientificintegrityinstitute.org>
jenstrom@ucla.edu
(310) 472-4274

Attached is my January 14, 2020 EPA Science Advisory Board Comment, which strongly supports the Supplemental Proposed EPA Rule "Strengthening Transparency in Regulatory Science." My Comment includes my detailed independent March 28, 2017 Dose-Response reanalysis of the 1982 ACS Cancer Prevention Study (CPS II) cohort. My reanalysis found no robust relationship between fine particulate matter (PM2.5) and total mortality in this cohort, contrary to the positive relationship found in the seminal March 1, 1995 AJRCCM Pope article. No errors have been identified in my reanalysis in the three years since its publication and my reanalysis has been strengthened by my May 29, 2018 response to December 13, 2017 criticism by Pope and ACS. I have identified serious problems in what EPA defines as "pivotal regulatory science": the dose response data and models in the CPS II cohort that were largely responsible for the establishment of the 1997 EPA PM2.5 NAAQS. Finally, my Comment documents the importance of independent access to underlying data and transparency in regulatory science and it challenges the scientific validity of EPA PM2.5 regulations.

Uploaded File(s) (Optional)

- Enstrom Comment to SAB Supporting EPA Transparency Rule 011420.pdf: **success**