

January 4, 2016

Michael T. Huguenin, A.B. (physics, WU), M.Sc. (management, MIT)
IEc Co-Founder and Special Consultant
mikehuguenin@indecon.com

Dear IEc Co-Founder Huguenin,

I am writing you because IEc President Andrew M. Schwarz has not responded to my December 23, 2015 email letter or to my December 29, 2015 telephone message (<http://scientificintegrityinstitute.org/IEcP122315.pdf>) regarding my December 15, 2015 letter to IEc Principal Henry A. Roman (<http://scientificintegrityinstitute.org/Roman121515.pdf>). Thus, I request that you and/or Mr. Schwarz convince Mr. Roman that the final IEc documents prepared for the 2016 SCAQMD AQMP must properly summarize the overwhelming evidence since 2000 that there are NO premature deaths in the SCAB or California caused by PM2.5 or ozone and thus must base the health benefits and socioeconomic assessments on NO premature deaths. Indeed, the SCAB has an age-adjusted total death rate that is among the lowest in the United States and the entire world and does not have premature or excess deaths due to air pollution!

Please carefully read my email letters to Mr. Schwarz and Mr. Roman for detailed documentation of the NULL evidence. SCAQMD Health Effects Officer (HEO) Jean Joseph Ospital, Dr.P.H., is fully aware of this NULL evidence, which includes all the results from the 2007-2013 SCAQMD Agreement No. R06-337 project involving George D. Thurston, Sc.D. Also, HEO Ospital knows that this NULL evidence needs to be properly presented to the SCAQMD Governing Board at a 2016 hearing on “the health impacts of particulate matter air pollution in the South Coast Air Basin”, as per CHSC Section 40471(b) (<http://scientificintegrityinstitute.org/Ospital073115.pdf>).

Until I receive an email response or telephone call from you confirming that final IEc documents will fully comply with my above request, I will continue taking the measures described in my email letters to Mr. Schwarz and Mr. Roman. Because you have basic knowledge of physics like I do, I want you to know that as of January 16, 2016, “critical mass” will be achieved on the SCAQMD Governing Board. This “critical mass” will make possible a “nuclear chain reaction” against scientifically unjustified PM2.5 and ozone regulations in the SCAB. Also, I predict that there will be a “thermonuclear explosion” on November 8, 2015 that will lead to the destruction of all scientifically unjustified PM2.5 and ozone regulations in the United States.

Thank you for your consideration of my important request. Please take it very seriously!

Sincerely yours,

James E. Enstrom, B.S. (physics, HMC), M.S. (physics, Stanford),
Ph.D. (physics, Stanford), M.P.H. (epidemiology, UCLA)
UCLA and Scientific Integrity Institute
jenstrom@ucla.edu
(310) 472-4274

cc: IEC President Andrew M. Schwarz <ams@indecon.com>
IEC Principal Henry A. Roman <har@indecon.com>
SCAQMD HEO Jean J. Ospital <jospital@aqmd.gov>

December 23, 2015

Andrew M. Schwarz, M.S.T. (Antioch), M.F.S. (Yale), M.B.A. (GWU)
President
Industrial Economics, Incorporated (IEc)
ams@indecon.com

Dear President Schwarz,

In his December 18, 2015 reply to me, IEc Principal Henry A. Roman refuses to properly modify draft IEc documents prepared for socioeconomic justification of the 2016 SCAQMD AQMP (<http://www.scientificintegrityinstitute.org/Roman121815.pdf>). My December 15, 2015 email letter requests that he properly cite the massive evidence that there are NO deaths due to PM2.5 and ozone in California (<http://www.scientificintegrityinstitute.org/Roman121515.pdf>). The draft IEc documents are not simply “a different interpretation of the air pollution health effects literature,” but they include “deliberate misrepresentations and exaggerations.” I believe the draft documents violate IEc policies (<http://www.indecon.com/iecweb/AboutUsValues.aspx>): “Our Values--IEc has been delivering unbiased work products for more than 30 years” and “Committed to Objective Analysis--We believe that the most intellectually honest basis for decision making is to let the evidence speak.”

Thus, I request that you and the other IEc Principals immediately review the overwhelming NULL evidence described in my December 15, 2015 email letter and its eight weblinks. Then, I request that you notify me via email that all final IEc documents prepared for the 2016 SCAQMD AQMP will cite this overwhelming NULL evidence and will state that PM2.5 and ozone have NO relationship to total mortality in the SCAB or California. Until I receive such a notification from you, I will continue the efforts that I began this week to explain the deliberate misrepresentations and exaggerations contained in the draft IEc documents to SCAQMD Board Members, the U.S. House Science Committee, and others who are interested in having regulatory policy in the SCAB and California based on the truth. If the final IEc documents do not include a complete and accurate presentation of the NULL mortality evidence regarding PM2.5 and ozone, I will make the case that all 22 IEc Principals, Dr. George D. Thurston, and EPA are conspiring with SCAQMD EO Barry Russell Wallerstein, D.Env., in a deliberate effort to impose scientifically unjustified and economically destructive EPA regulations on 17 million SCAB residents.

In order to understand how the ground is shifting under EPA-support groups like IEc, please read the December 23, 2015 Wall Street Journal editorial “Brushing Back a Lawless EPA” (<http://www.wsj.com/articles/brushing-back-a-lawless-epa-1450829307>).

I hope you take my request seriously, because it is very serious and I am a very serious scientist.

Thank you very much for your consideration.

Sincerely yours,

James E. Enstrom, Ph.D. (Stanford), M.P.H. (UCLA)

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INDUSTRIAL ECONOMICS, INCORPORATED

18 December 2015

Dr. James Enstrom
UCLA Pub Hlth
BOX 951772, A1-295 CHS
Los Angeles, CA 90095-1772

Dear Dr. Enstrom:

We received your telephone message of December 11, 2015 and your email dated December 15, 2015 in which you cite papers and other information you would like us to consider as part of our work supporting the South Coast Air Quality Management District (SCAQMD). We will review the referenced materials.

We understand from both communications that you have a different interpretation of the air pollution health effects literature than the one presented in our review. As you know, there is a formal process by which the public can submit comments to SCAQMD regarding the development of the Air Quality Management Plan. I believe that is the appropriate forum for you to present your concerns for consideration by SCAQMD.

Regarding your request that IEc amend our documents to state “that PM2.5 and ozone have NO relationship to total mortality in the SCAB or California,” IEc respectfully declines. IEc has a well-established reputation for conducting objective analyses. We disagree with your allegation that our work contains “deliberate misrepresentations and exaggerations.”

If you choose to continue this discussion, we request that you direct your comments through the systems established by SCAQMD. Written comments may be submitted to SCAQMD’s Executive Officer, Dr. Barry R. Wallerstein (BWallerstein@aqmd.gov; 909-396-3131).

Sincerely,

Henry Roman
Principal

cc:
Mr. Eric Ruder, IEc;
Dr. George Thurston, NYU Medical School

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Date: Tuesday 12/15/2015 10:08 AM
To: Henry A. Roman <har@indecon.com>
From: James E. Enstrom <jenstrom@ucla.edu>
CC: George D. Thurston <George.Thurston@nyumc.org>;
Lisa A. Robinson <robinson@hsph.harvard.edu>; Eric D. Ruder <er@indecon.com>
Re: Request to Modify IEc Documents re 2016 SCAQMD AQMP

December 15, 2015

Henry A. Roman, M.S. (HSPH)
Principal
Industrial Economics, Incorporated (IEc)
har@indecon.com

Dear Mr. Roman,

This email letter is a follow-up to my unanswered December 11, 2015 telephone message to you regarding your December 10, 2015 SCAQMD STMRP Socioeconomic Session Presentation “Recommendation for Health Effects C-R and Valuation Function”

(http://www.aqmd.gov/home/library/meeting-agendas-minutes/agenda?title=STMPR_Socio_121015). I have overwhelming evidence that your draft IEc documents misrepresent and exaggerate the relationship of PM2.5 and ozone to total mortality in the South Coast Air Basin (SCAB) and California.

I am particularly concerned about the “IEc Literature Review of Air Pollution-Related Health Endpoints and Concentration-Response Functions for Particulate Matter: Results and Recommendations Draft Report December 4, 2015” (http://www.aqmd.gov/docs/default-source/Agendas/STMPR-Advisory-Group/december-2015/3a_draft_pm.pdf?sfvrsn=4) and the PPT “IEc Review of Health Endpoints and Economic Valuation for Socioeconomic Report on 2016 South Coast AQMP” (http://www.aqmd.gov/docs/default-source/Agendas/STMPR-Advisory-Group/december-2015/3f_stmpr_presentation_121015.pdf?sfvrsn=4).

In 2012 I and other doctoral-level scientists submitted detailed public comments to SCAQMD, which are shown on pages 213-254 of the 2012 AQMP Appendix I Health Effects Document (<http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2012-air-quality-management-plan/final-carb-epa-sip-dec2012/2012-aqmp-carb-epa-sip-submittal-appendix-i.pdf>). These comments provide overwhelming evidence as of 2012 that there is NO relationship between PM2.5 and total mortality in California. The evidence that “Particulate Matter Does Not Cause Premature Deaths” is now even stronger, as summarized in my August 17, 2015 submission to *Science* (<https://www.nas.org/images/documents/PM2.5.pdf>).

You cited some of this NULL evidence in the September 21, 2006 IEc EPA Expert Elicitation Report (http://www3.epa.gov/ttnecas1/regdata/Uncertainty/pm_ee_report.pdf) and Dr. George Thurston has been well aware of this NULL evidence ever since he and I attended the February

26, 2010 CARB Symposium “Estimating Premature Deaths from Long-term Exposure to PM2.5” (http://www.arb.ca.gov/research/health/pm-mort/pm-mort-ws_02-26-10.htm). Furthermore, the September 15, 2015 *EHP* paper by Thurston, et al., found NO relationship between PM2.5 and total mortality during 2000-2009 in the publicly available NIH-AARP Diet and Health cohort (<http://ehp.niehs.nih.gov/1509676/>).

Thus, I request that you and/or Dr. Thurston notify me by December 21, 2015 that all final IEC documents prepared for the 2016 SCAQMD AQMP will cite the overwhelming NULL evidence described above and will state that PM2.5 and ozone have NO relationship to total mortality in the SCAB or California. If I do not receive such a notification by December 21, 2015, I will immediately thereafter begin explaining the deliberate misrepresentations and exaggerations contained in the draft IEC documents to SCAQMD Board Members, certain SCAQMD staff members, impacted SCAB business leaders, the U.S. House Science Committee, scientific colleagues, the press, and others who are interested in having regulatory policy in the SCAB and California based on the truth.

Thank you for your prompt attention to this important request.

Sincerely yours,

James E. Enstrom, Ph.D. (Stanford), M.P.H. (UCLA)
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(310) 472-4274

cc: George D. Thurston, D.Sc. (HSPH) <George.Thurston@nyumc.org>
Lisa A. Robinson, M.P.P. (Harvard) <robinson@hsph.harvard.edu>
Eric D. Ruder, M.S. (HSPH) <er@indecon.com>

Date: Fri, 31 Jul 2015 14:20:44 -0700

To: Jean J. Ospital <jospital@aqmd.gov>

From: "James E. Enstrom" <jenstrom@ucla.edu>

Subject: SCAQMD Health Effects Officer Will Be Held Accountable

Cc: Philip M. Fine <pfine@aqmd.gov>, Mohsen Nazemi <mnazemi@aqmd.gov>,

Ian MacMillan <imacmillan@aqmd.gov>, C. Arden Pope III <cap3@byu.edu>,

Jane V. Hall <jhall@fullerton.edu>

July 31, 2015

Jean J. Ospital, Dr.P.H.

SCAQMD Health Effects Officer

jospital@aqmd.gov

Dear Dr. Ospital,

I understand that you are retiring from SCAQMD today. I am going to make every effort to see that the next SCAQMD Health Effects Officer is a doctoral level epidemiologist or statistician who honestly and objectively evaluates and summarizes air pollution health effects evidence, particularly the evidence that applies to the South Coast Air Basin (SCAB). I plan to continue my efforts to correct the false and out of context health effects evidence contained in the 2003, 2007, and 2012 AQMPs and the 2008 MATES III and 2015 MATES IV. You are personally responsible for the inaccurate and exaggerated health effects contained in all of these documents. This faulty evidence has been used as the basis for countless SCAQMD regulations that are not justified on a scientific, public health, or economic basis. These SCAQMD regulations have had a severe adverse impact on the Exide Battery Recycling Plant in Vernon, the Exxon Mobil Refinery in Torrance, the World Logistics Center in Moreno Valley, thousands of truckers at the Ports of Los Angeles and Long Beach, and thousands of manufacturers throughout the SCAB.

The SCAB has age-adjusted total death rates and total cancer death rates that are lower than the corresponding rates in almost all of the 50 states. Furthermore, it has been known since the 2000 HEI Reanalysis Report, particularly by PM2.5 experts like Dr. Pope, that Los Angeles area residents have a relatively low absolute PM2.5 mortality risk. You have been fully aware of my concerns at least since our April 29, 2011 and July 6, 2011 personal meetings at UCLA and SCAQMD. In spite of this, you have continued to make exaggerated claims about the health effects of PM2.5, diesel PM, and ozone in the SCAB. Furthermore, you have never complied with California Health and Safety Code Section 40471 (b), which requires that before an AQMP is finalized and approved, the SCAQMD 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."

Eventually, you and the others who have exaggerated the health effects of PM2.5, diesel PM, and ozone will be held accountable. Part of this accounting will come through the U.S. Congress, particularly by use of the Secret Science Reform Act, which has been approved by the House of Representatives and is awaiting a vote by the Senate. More details are provided in my June 11, 2015 Tenth International Conference on Climate Change Panel 8 presentation (<http://www.ustream.tv/recorded/63542583>).

Sincerely yours,

James E. Enstrom, Ph.D., M.P.H.
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