



Science at the heart of medicine

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Dr. William A. Burke, Chairman and
Other Members of the Governing Board
South Coast Air Quality Management District
21865 Copley Drive
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2012aqmpcomments@aqmd.gov

Dear Board Members:

I am writing to convey my emphatic support a 2012 Air Quality Management Plan (AQMP) Appendix I Health Effects that focuses on “the health impacts of particulate matter air pollution in the South Coast Air Basin,” in accord with California Health and Safety Code Section 40471(b). In addition, I urge you to hold a Board hearing on the health impacts report and its peer review, in accord with this Code Section.

In particular, please address the September 25 public comments of Jonathan M. Samet, M.D., and the August 30 and September 20 public comments of James E. Enstrom, Ph.D. I have been a cancer epidemiologist for over 30 years, and I have been aware of the important research of these outstanding epidemiologists during this entire period. In addition, I have personally worked with Dr. Enstrom on environmental epidemiology issues. You need to take their criticism of Appendix I very seriously.

My own examination of the PM_{2.5} epidemiologic findings of Dr. Samet, Dr. Enstrom, and two dozen other highly qualified scientists, convincingly shows that there is no relationship between PM_{2.5} and total mortality in California and that the current US EPA National Ambient Air Quality Standard (NAAQS) for PM_{2.5} is not applicable to California or the South Coast Air Basin (SCAB). Therefore, the AQMP should request a waiver from this NAAQS, rather than proposing stricter emission controls.

In conclusion, the final 2012 AQMP must be based on the actual health impacts of particulate matter in the SCAB. Otherwise, I believe that it can be vigorously challenged on scientific, economic, and legal grounds. I am following this issue from New York because the PM_{2.5} NAAQS has national epidemiologic and regulatory significance and because the exaggeration of PM_{2.5} risks fits the pattern of examples described in my 2008 book “Hyping Health Risks.”

Thank you for your attention to my comments.

Sincerely yours,

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