Comment to NASEM DELS-BEST NAAQS Committee re July 19-20 NASEM Meetings
"Assessing Causality from a Multidisciplinary Evidence Base for National Ambient Air Quality Standards"
https://www.nationalacademies.org/our-work/assessing-causality-from-a-multidisciplinary-evidence-base-for-national-ambient-air-quality-standards
https://www8.nationalacademies.org/pa/feedback.aspx?type=project&key=DELS-BEST-20-06

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I request the following considerations for integrating, documenting, and evaluating scientific evidence to assess causality of health and welfare effects by air pollutants as part of National Ambient Air Quality Standards (NAAQS) reviews conducted by the Environmental Protection Agency (EPA).

1. Assess the causality of air pollutant health effects using ONLY the evidence obtained from studies of US subjects, since the NAAQS only apply to the US. US EPA regulations should be based on US evidence.

2. Assess the causality of air pollutant health effects using ALL the evidence obtained from studies of US subjects. Published studies showing no air pollutant health effects are often ignored or minimized by EPA and many null studies are never published. My comprehensive meta-analyses that show NO relationship between PM2.5 and total mortality in the US and California must be considered.

3. Assess the causality of air pollutant health effects based on the quality and integrity of the US evidence. Consider the many points made in my Review of air pollution and mortality in 69 million Medicare beneficiaries (http://scientificintegrityinstitute.org/estjeeadd070821.pdf). My Review describes the severe flaws of ecological epidemiology and provides evidence that Medicare records have been improperly accessed and used. If given the opportunity, many Medicare beneficiaries, including myself, would refuse to have their confidential medical records used for severely flawed ecological epidemiology. Furthermore, in violation of their confidentiality, I believe that many individual beneficiaries can be identified based on the amount of information that has been released.

4. When assessing the causality of air pollutant health effects, incorporate the extensive evidence that the Linear No Threshold (LNT) Model is severely flawed. Dr. Edward Calabrese is the leading expert on the flaws in LNT (https://doi.org/10.1016/j.envres.2021.111025).