

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 STM RP Socioeconomic Session Presentation “Recommendation for Health Effects C-R and Valuation Function”

(<http://www.aqmd.gov/home/library/meeting-agendas-minutes/agenda?title=STM RP Socio 121015>). I have overwhelming evidence that your draft IEc documents misrepresent and exaggerate the relationship of PM_{2.5} 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/STM RP-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/STM RP-Advisory-Group/december-2015/3f_stm pr 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 PM_{2.5} 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,

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