



November 15, 2011

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Dear Board Members,

On November 14, 2011 I learned of the November 16, 2011 APCD Hearing to Consider Adoption of New Rule 1001, Coastal Dunes Dust Control Requirements (<http://www.slocleanair.org/air/PMStudyData.php>). Also, I have just received a copy of the November 14, 2011 letter to APCD regarding Rule 1011 from Penny Borenstein, M.D., M.P.H., San Luis Obispo County Health Officer.

I have not had time to study Rule 1001 or the South County Phase 2 Particulate Study in any detail. However, based on my relevant scientific expertise as a California epidemiologist, I strongly recommend that you carefully assess the current health effects of particulate matter and carefully assess the validity of the South County Phase 2 Particulate Study before making a final decision on Rule 1001.

I would like to comment on several aspects of Dr. Borenstein's letter. First, I strongly disagree with her statement "Particulate matter, especially that comprised of particles 10 microns in diameter or less (PM<sub>10</sub>), is a known health hazard." The December 2009 US EPA Integrated Science Assessment for Particulate Matter concluded that the scientific evidence on the long-term health effects of coarse particles (PM<sub>10-2.5</sub>) was "inadequate" to make a "causality determination" with regard to cardiovascular effects, respiratory effects, reproductive and developmental effects, cancer, and mortality. Furthermore, the US EPA National Ambient Air Quality Standard (NAAQS) for PM<sub>10</sub> includes the statement "Due to a lack of evidence linking health problems to long-term exposure to coarse particle pollution, the agency revoked the annual PM<sub>10</sub> standard in 2006 (effective December 17, 2006)" (<http://www.epa.gov/pm/standards.html>).

Second, Dr. Borenstein's statement, "The California health standard for PM<sub>10</sub> is often exceeded in this area of our county where residents and visitors are exposed," needs proper perspective, because the national 24-hour PM<sub>10</sub> standard is rarely exceeded in the Coastal Dunes area. The California 24-hour PM<sub>10</sub> standard (50 µg/m<sup>3</sup>) is only one-third of the national 24-hour PM<sub>10</sub> standard (150 µg/m<sup>3</sup>) (<http://www.arb.ca.gov/research/aaqs/aaqs2.pdf>). The California standard is not scientifically justified based on current PM<sub>10</sub> health effects in California or the US. The California standard, which was established by a special right granted to the California Air Resources Board (CARB), needs to be reassessed and it should not be more restrictive than the national standard.

Third, Dr. Borenstein's statement, "The medical and epidemiologic literature is replete with documented human health effects from PM<sub>10</sub>," is misleading because the health effects that she is cites are not necessarily applicable to the people who are exposed to PM<sub>10</sub> from the Coastal Dunes. Furthermore, after assessing all the available evidence on the health effects on PM<sub>10</sub> and finding it wanting, the US EPA revoked its annual PM<sub>10</sub> standard in 2006.

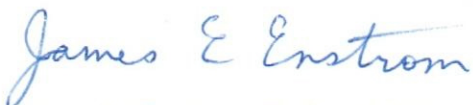
If you agree to postpone your decision on Rule 1001, I would be willing to communicate with Dr. Borenstein and APCD staff in order to update them on the latest evidence regarding particulate matter (PM<sub>2.5</sub> and PM<sub>10-2.5</sub>) health effects in California. I believe that this new evidence needs to be incorporated into the South County Phase 2 Particulate Study and needs to be clearly explained to APCD Board Members. I believe that this new health effects information would improve your decision making process regarding Coastal Dunes dust.

I can make a strong case that California is one of the healthiest states in American and that current air pollution health effects in California have been greatly exaggerated by CARB. These exaggerations need to be explained to local air pollution control districts throughout the state. Also, I can make a strong case that there are many health issues in San Luis Obispo County that are far more important than the alleged adverse health effects of Coastal Dunes dust.

For your information, I am a Research Professor at the UCLA School of Public Health and I have been conducting epidemiologic research and publishing peer reviewed epidemiologic papers at UCLA since 1974. I have been a Fellow, American College of Epidemiology since 1981. I am the author of the largest, most detailed journal publication on the relationship of fine particulate air pollution and mortality in California. For more background on me and my research, please watch the April 4, 2011 ReasonTV YouTube (<http://reason.com/blog/2011/04/04/the-green-politics-of-reprisal>) and read the September 7, 2011 LandLineMag.com article ([http://www.landlinemag.com/todays\\_news/Daily/2011/Sep11/090511/090711-06.shtml](http://www.landlinemag.com/todays_news/Daily/2011/Sep11/090511/090711-06.shtml)). For more information on the health effects of particulate matter and, please examine my September 16, 2011 US Small Business Administration Presentation (<http://www.scientificintegrityinstitute.org/Enstrom091611.pdf>).

Thank you very much for your consideration

Sincerely yours,



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