
From: Emily Nelson <dremilyn@comcast.net>
Sent: Friday, August 19, 2016 11:46 AM
To: John J. Benoit (GBM)
Cc: Jo Kay Ghosh; Philip Fine; Barbara Baird
Subject: Draft AQMP 2016 Appendix I Health Effects Advisory Council Comment

Dear Supervisor Benoit,

Thank you for the opportunity to participate on the Advisory Council for the review of the Draft 2016 AQMP Appendix I Health Effects. Our meeting yesterday was meaningful and I believe the SCAQMD staff have done an excellent job. Since I have participated on the AQMD review of Health Effects for the third or fourth time, I just have a few conceptual comments to contribute to the Final Draft.

Dr. Jo Kay Ghosh, SCAQMD Health Effects Officer, and her staff have admirably expanded the prior Health Effects summaries to include the latest research available. This job was made more difficult since the U.S. EPA is also updating their Integrated Science Assessment review for Particulate Matter which was last completed in 2009. Their soon to be published more recent review would have made the job much easier. Since I was once the only biologist on staff at the District and served as the prototype for Health Effects Officer, I know that I would not want to tackle some of this work with this matter of timing.

Overall, my comments are:

- 1) Explain the purpose of this appendix more clearly in the Introduction. Also state that it is not the purpose of this appendix to present data on ambient air quality statistics, attainment status, air pollution geographic distribution, environmental justice, socioeconomic impacts, preferred control strategies, or cost effectiveness. All of these discussions can be found in the complete AQMP document and its other appendices. Unfortunately, some of the Advisory Council members seemed to be unclear on the purpose of Appendix I and there was much discussion that did not belong to yesterday's meeting.
- 2) Since most of the readers of Appendix I will not have scientific health effects background, it might be most useful to define some additional regulatory and medical terms. Specifically, EPA's designations for weight of evidence presented in Table I-1 were apparently unclear to some Advisory Council members. Perhaps a statement that these are determined by EPA and are a result of scientific evaluation of the research studies they have reviewed. I'm still waiting for a creative numbering system that would more clearly identify weight of evidence that the public would understand. Perhaps a Richter scale of weight of evidence? Also, a quick definition of FEV1 could be very useful for some readers.
- 3) The introduction should also describe the legislative and regulatory mandates for each agency involved in this scientific review. It should be clear that the SCAQMD, while commenting on and contributing to proposed ambient air quality standards, must do all in its power to attempt to attain those standards once they are adopted by EPA. Once the CA state standards are mentioned, it would be useful to quote the Health and Safety Code that only requires the SCAQMD to attain these usually more stringent standards at the earliest practicable time with no specific deadlines codified.

One final comment would be to carefully select the Advisory Council members for each appendix based on their expertise. I truly was hoping for more discussion of the latest health effects research from others such as DRI or Dr. Froines.

Again, thank you for this opportunity to be a small part of your AQMP review process.

Sincerely, Emily Nelson, D.Env.

Health and Environmental Risk Consultant