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February 8, 2002

SCAQMD
EXECUTIVE OFFICE

FILE NO. 01 8282-0000

Dr. Barry Wallerstein
Executive Officer
South Coast Air Quality Management District
21865 E. Copley Drive
Diamond Bar, California 91765

Dear Dr. Wallerstein.

We have reviewed the Draft Air Quality Management Plan Appendix I, Health Effects, dated December 19, 2001 ("Draft Health Effects Report"), and provide the following comments on behalf of the Regulatory Flexibility Group.

As currently written, the Draft Health Effects Report fails to satisfy the needs of the District and the public. The Report is conclusory in nature, and comprised of generalized and unsupported statements regarding potential health effects of air pollution. The report declares that air pollution is bad, and both short and long term exposure to air pollution can result in serious health effects. These declaratory statements are not adequate. Detailed and specific information regarding the scientific study of the health effects of air pollution must be provided, and statements in the report concerning the health impacts of air pollution must be supported with citations to valid scientific studies. The report should also attempt to reconcile the findings of the studies that have been completed, rather than a simple recitation of the findings of each study without further analysis.

While the Draft Health Effects Report includes a brief discussion of new developments in the study of particulate matter, detailed information is not provided. New information on this subject is available. For example, on November 29, 2001, the California Air Resources Board and the California Office of Environmental Health Hazard Assessment released a draft report "Review of the California Ambient Air Quality Standards for Particulate Matter and Sulfates," containing a review of the health impacts of particulate matter. The Draft Health Effects Report mentions the review, but provides only summary information. *See* Draft Health Effects Report at pp. I-6 to I-7. A detailed discussion of the review and its impact on proposed AQMP control measures would be beneficial, and should be included in the final version of the report.

Finally, the Draft Health Effects Report also fails to relate what is known about the health effects of air pollution based on the scientific literature, to potential health effects in the SCAB based on existing ambient levels. It would be very helpful to put the scientific

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literature into the context of the SCAB. Without this context, the report is too abstract to be helpful in formulating public policy.

Given that the Draft Health Effects Report may serve as the basis for the introduction of new and expensive regulatory measures aimed at reducing pollution in the SCAB, it is critical that it be a detailed and complete analysis. We urge the District to incorporate the suggestions contained in this letter as it prepares the final document.

Truly yours,

A handwritten signature in black ink, appearing to read "Michael J. Carroll". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Michael J. Carroll
of LATHAM & WATKINS

cc: Robert Wyman
Regulatory Flexibility Group