

From: James E. Enstrom [mailto:jenstrom@ucla.edu]
Sent: Monday, November 16, 2015 9:46 AM
To: 'Joe Cassmassi' <jcassmassi@aqmd.gov>
Cc: 'Xinqiu Zhang' <xzhang@aqmd.gov>; 'Kalam Cheung' <kcheung@aqmd.gov>;
'Sang-Mi Lee' <slee@aqmd.gov>; 'Chung Liu' <cliu@aqmd.gov>; 'Yifang Zhu' <yifang@ucla.edu>
Subject: Important Request re November 17 SCAQMD STMPR AG Agenda

November 16, 2015

Joe Cassmassi
Planning and Rules Director
SCAQMD 2016 Air Quality Management Plan (AQMP)
Scientific, Technical & Modeling Peer Review (STMPR) Advisory Group
jcassmassi@aqmd.gov

Dear Mr. Cassmassi,

I am submitting these written public comments to the STMPR Advisory Group and to the SCAQMD staff members who are presenting at the November 17, 2015 Modeling Session Meeting. I make four basic points that are highly relevant to the preparation of the 2016 AQMP, although none of these points are on the Modeling Session Agenda. I request that all four of my points be addressed by the STMPR Advisory Group and SCAQMD staff as soon as possible.

1) There is overwhelming evidence that the ambient levels of 8-hour ozone and 24-hour fine particulate matter (PM_{2.5}) throughout the South Coast Air Basin (SCAB), as measured by SCAQMD (<http://www.aqmd.gov/home/library/air-quality-data-studies>), are substantially below the current USEPA NAAQS of 75 ppb for 8-hour ozone and of 35 µg/m³ for 24-hour PM_{2.5} (<http://www3.epa.gov/ttn/naaqs/criteria.html>). For instance, on November 15, 2015, the entire SCAB had an ambient 8-hour maximum ozone exposure of 53 ppb. The November 15, 2015 forecast for ambient 24-hour PM_{2.5} exposure at 38 monitoring stations throughout the SCAB ranged from 10 to 21 µg/m³, with an average of 12.9 µg/m³.

2) There is overwhelming evidence that personal exposure to ozone and PM_{2.5} among the residents of the SCAB is much lower than the ambient exposure levels cited above. For instance, from June 1995 to May 1996 the average personal exposure of school children was 11.4 ppb in Upland and 13.9 ppb in mountain towns between Crestline and Running Springs (<http://www.ncbi.nlm.nih.gov/pmc/articles/PMC1637960/pdf/envhper00304-0121.pdf>).

3) There is strong evidence that China is the source of a significant portion of the ozone (<http://news.sciencemag.org/earth/2014/09/china-blamed-u-s-ozone>) and PM_{2.5} (<http://blogs.wsj.com/chinarealtime/2010/12/01/california-pollution-made-in-china/>) in the SCAB and throughout California. Sources of ozone and PM_{2.5} that are outside of the SCAB need to be addressed in the 2016 AQMP.

4) Public hearings need to be held as soon as possible before the SCAQMD Board regarding the latest report and peer review on “the health impacts of particulate matter air pollution in the South Coast Air Basin,” in accordance with California Health and Safety Code Section 40471(b)

<http://www.leginfo.ca.gov/cgi-bin/displaycode?section=hsc&group=40001-41000&file=40460-40471>). Such hearings have been mandated every three years since 2001, but they have never been held before the SCAQMD Board Members. There is strong evidence that the health impacts of particulate matter in the SCAB are very minimal, as I have repeatedly stated to SCAQMD during the past decade.

In order to understand the importance of my request, please read recent comments critical of EPA, CARB, and SCAQMD (<http://www.scientificintegrityinstitute.org/BC110115091215.pdf>). These comments address both ozone and PM2.5 and have been published in the Wall Street Journal, the Los Angeles Daily News, the Bakersfield Californian, and the San Bernardino Sun. They include an op-ed by an SCAQMD Board Member and statements of concern by San Joaquin Valley Air Pollution Control Officer Seyed Sadredin.

Thank you very much for your prompt attention to my request.

Sincerely yours,

James E. Enstrom, Ph.D., M.P.H.
UCLA and Scientific Integrity Institute
jenstrom@ucla.edu
(310) 472-4274

cc: Xinqiu Zhang <xzhang@aqmd.gov>
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Sang-Mi Lee <slee@aqmd.gov>
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Yifang Zhu <yifang@ucla.edu>