

**Serious Flaws in 2012 Air Quality Management Plan That Must Be Addressed
and Corrected by SCAQMD Governing Board Before Implementation of
2012 AQMP and Before Proceeding with Development of 2015 AQMP**

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- 1) The Final December 2012 SCAQMD Air Quality Management Plan (AQMP) (<http://aqmd.gov/aqmp/2012aqmp/Final/index.html>) should comply with all provisions of California Health and Safety Code (CHSC) Section 40471 (b) before it is implemented. Particularly important is the provision for at least one SCAQMD Governing Board hearing specifically devoted to the "report and peer review" of "the health impacts of particulate matter air pollution [PM] in the South Coast Air Basin [SCAB]." (<http://www.leginfo.ca.gov/cgi-bin/displaycode?section=hsc&group=40001-41000&file=40460-40471>). No such hearings were held before the full Board in 2001, 2004, 2007, and 2010. The Board hearing required in 2013 should be held as soon as possible, particularly before proceeding with the 2015 AQMP.
- 2) The Final 2012 AQMP Chapter 2 Health Effects and Appendix I Health Effects (<http://aqmd.gov/aqmp/2012aqmp/Final/AppI.pdf>) seriously misrepresents and exaggerates the health effects and health impacts of PM in the SCAB and does not properly recognize the overwhelming evidence, by 26 doctoral level scientists, of NO relationship between PM (PM2.5 and PM10) and total mortality ("premature deaths") in the SCAB and California. This evidence is summarized in my September 28, 2012 ASA JSM paper, which is in Appendix I comments.
- 3) The Final 2012 AQMP Socioeconomic Report (<http://aqmd.gov/aqmp/2012aqmp/Final/FinalSocioeconomicReport.pdf>) is severely flawed and must be redone by objective statisticians and economists. Table 3-5 on page 3-10 claims to show "the quantifiable health benefit of improved air quality associated with the 2012 AQMP for PM2.5 morbidity and mortality relative to air quality without the Plan." However, 99% of \$2.247 billion per year in health benefits is illusory because no PM2.5 mortality will be avoided by implementation of the 2012 AQMP. The Health Benefit Assessment for the 2012 AQMP SES Report by former US EPA economist Leland Deck must be redone because he was improperly awarded sole-source contract in 2006 based on incorrect use of "endangerment of public health" provision in Consultant Selection Policy (<http://aqmd.gov/hb/2006/October/06103a.html>).
- 4) Based on CHSC Section 40420 (a)(5) former Riverside Mayor Ronald O. Loveridge should have been replaced as the SCAQMD representative of the cities in Riverside County soon after December 11, 2012, when his term as Mayor ended (<http://www.leginfo.ca.gov/cgi-bin/displaycode?section=hsc&group=40001-41000&file=40420-40428>). His replacement, Mayor Ben Benoit, was selected on November 19, 2012, but he did not become a Board Member until about February 7, 2013. All Board motions after December 11, 2012 that involved Mayor Loveridge, particularly the February 1, 2013 motions, should be revoked by the new Board.
- 5) The Board needs to put the implementation of the Final 2012 AQMP into perspective in light of three factors, which are highly relevant to the public health and economic health of the SCAB:
 - 1) as of 2009 the SCAB had an age-adjusted total death rate lower than the death rate in every state except Hawaii;
 - 2) as of September 2012 the SCAB had an unemployment rate higher than every state except Nevada and Rhode Island;
 - and 3) as of 2013 PM2.5 levels in Communist China have been reported to be over 50 times the PM2.5 levels in the SCAB.