

January 30, 2017

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Dear Dr. Ghosh,

I am writing to express my extreme disappointment with your December 8, 2016 Final Draft 2016 AQMP [Appendix I Health Effects](#). Your January 3, 2017 198-page document, [Responses to Comments on Appendix I](#), DOES NOT address the numerous critical comments that I submitted to you on [January 11, 2016](#) and [July 26, 2016 and August 15, 2016](#). Below I describe six major problems with the final version of Appendix I.

1. Appendix I DOES NOT comply with [California Health and Safety Code Section 40471 \(b\)](#). Instead of satisfying the requirement “the south coast district board, in conjunction with a public health organization or agency, shall prepare a report on the health impacts of particulate matter air pollution in the South Coast Air Basin,” you stated on page 188 of your Responses document “it is not the intention of this Appendix to assess whether there is or is not an effect of a specific air pollutant on any particular health endpoint” Instead of satisfying the requirement to prepare Appendix I “in conjunction with a public health organization or agency,” you instead prepared it in conjunction with two aggressive regulatory agencies within CalEPA: OEHHA and CARB. Instead of satisfying the requirement that the “south coast district board shall hold public hearings concerning the report and the peer review,” you held four November 2016 public hearings which were conducted without the SCAQMD Board Members
2. Appendix I and your Responses document DO NOT describe the overwhelming evidence of NO relationship [relative risk (RR) = 1.00] between PM_{2.5} and total mortality in California. The weighted average of the most recent results from six different California cohorts show RR = 0.999 (0.988-1.010), which means there are NO premature deaths caused by PM_{2.5} in California. An appended table shows this null California evidence. This table, which is page 5 of my August 15, 2016 comments, was deliberately omitted from your Responses document.
3. Appendix I and your Responses document completely ignore this statement in my August 15, 2016 comments: “I have now submitted for publication a manuscript with null findings that invalidate the positive nationwide relationship between PM_{2.5} and total mortality published in the seminal Pope 1995 paper, which is based on the American Cancer Society Cancer Prevention Study II (CPS II) cohort. My null CPS II cohort findings raise serious doubts about validity of the positive CPS II cohort findings in Jerrett 2005, Jerrett 2009, and Jerrett 2013, which have been used as the basis for the PM_{2.5} premature death claims in the PPTs of Drs. Oliver and Shen.” My manuscript, entitled “Fine Particulate Matter and Total Mortality in Cancer Prevention Study II Reanalysis,” is now in press in a PubMed recognized scientific journal and should appear online in February 2017. This paper provides important new evidence that PM_{2.5} does not cause premature deaths anywhere in the United States, including California.

4. Appendix I and the [2016 AQMP SES Report](#) rely heavily the PM_{2.5}-mortality publications by Dr. Michael Jerrett and his co-authors. You have co-authored with Jerrett seven air pollution related publications during 2011-2016. This co-authorship raises serious doubts about your objectivity, particularly since you have ignored null PM_{2.5}-mortality results and have ignored my challenges to the validity of the Jerrett publications. On November 11, 2016 I made a [US Office of Research Integrity allegation](#) that Jerrett 2013 falsified and exaggerated the relationship between PM_{2.5} and total mortality in California. An ORI Investigator agreed that the Jerrett 2013 results “do not provide evidence that air pollution is directly responsible for mortality.” My US ORI allegation and a table showing NO PM_{2.5}-mortality relationship in California are appended.

5. Appendix I does not describe the ACTUAL human exposures to PM_{2.5}, ozone, and NO_x in the SCAB. The human exposures to these pollutants are much lower than the ambient levels recorded at SCAQMD monitors and the average human exposures are well below the level of measurable health effects for these air pollutants. SCAQMD Board Members and SCAB residents must be informed of their actual exposures to pollutants. Furthermore, they must be informed that these levels are well below the corresponding US EPA NAAQS.

6. Appendix I provides no context regarding the impact of air pollution and other risk factors on the overall health of SCAB residents. An appended table shows low 2014 age-adjusted death rates from all causes, all cancer, and all respiratory disease in California and the SCAB. These death rates are among the lowest in the United States and the World. This table, which is page 6 of my August 15, 2016 comments, was deliberately omitted from your Responses document.

If the 2016 AQMP is approved by the SCAQMD Board on February 3, 2017, I will make a strong case to the new US EPA Administrator, the US House Science Committee, the US House Energy Committee, and the US Senate Environment Committee that the AQMP should not be implemented because it is NOT justified on a scientific or public health basis. Also, I will make a strong case to business and taxpayer groups in Southern California that the 2016 AQMP is scientifically unjustified and should not be funded. Many concerned scientists like myself are doing everything we can to stop SCAQMD from implementing new unjustified environmental regulations in Southern California, as part of a national effort to reduce unjustified regulations.

Finally, I am sending this email letter to all UCLA School of Public Health faculty members who have been involved with SCAQMD and/or with your 2011 Ph.D. in Epidemiology. I request that these faculty members assess my above comments and inform SCAQMD whether they believe the 2016 AQMP is justified on a public health basis. These faculty members are directly responsible for your training as an environmental epidemiologist and you, as a prominent public health official, are a direct reflection of the values and integrity of the School of Public Health.

Thank you for taking this message seriously, because it is a VERY SERIOUS message.

Sincerely yours,

James E. Enstrom, Ph.D., M.P.H.

UCLA and Scientific Integrity Institute

<http://climateconferences.heartland.org/james-enstrom-iccc10-panel-8/>

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