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Orange County Register Opinion June 4, 2012

Published: June 4, 2012 Updated: June 7, 2012 4:03 p.m.

Reader Rebuttal (James Enstrom): Air pollution in L.A. region

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The April 25, 2012, Register article "Smog report: L.A. region still among the nation's worst" is highly misleading because it uncritically relies upon two reports that exaggerate the air pollution problem in Los Angeles and Orange Counties. The air pollution problem is also exaggerated by the California Air Resources Board, and the South Coast Air Quality Management District, the two agencies that have responsibility for air quality in Southern California.

The first report, "State of the Air 2012" by the American Lung Association (ALA) (<http://www.stateoftheair.org/2012/assets/state-of-the-air2012.pdf>), focuses on two major air pollutants, ozone and fine particulate matter (PM2.5). The counties of Los Angeles and Orange and the Los Angeles South Coast Air Basin are listed as "Fail" and given a ranking of "F" based on the ALA assessment of the number of days that measured levels of ozone and PM2.5 exceed the National Ambient Air Quality Standards (NAAQS). The NAAQS were set by the US Environmental Protection Agency (EPA) in 1997 and 2006 based on the EPA assessment of the national health effects associated with these pollutants. However, extensive new evidence has been published since 2006 indicating that the health effects of these pollutants in California are substantially less than the national health effects. Also, in spite of the fact that air pollution in the South Coast Air Basin is at a record low level and that the associated health effects are minimal, the ALA report calls for "the passage of stricter pollution standards."

The second report, the April 2012 "California's Progress Toward Clean Air" by the California Air Pollution Control Officers' Association (CAPCOA), makes inaccurate claims about air pollution (<http://www.capcoa.org/wp-content/uploads/downloads/2012/04/CAPCOA-Progress-Toward-Clean-Air-2012.pdf>). The claim "For the South Coast ... the annual health costs of air pollution have been estimated to total \$22 billion (\$1,250 per person). . ." comes from an unpublished 2008 cost-benefit analysis done by CSU Cal State Fullerton professor Jane Hall (<http://business.fullerton.edu/centers/iecs/reports/Benefits%20of%20Meeting%20Clean%20Air%20Standards.pdf>). The claim "9,200 annual cases of premature cardiopulmonary deaths could be avoided if the national annual standard for PM2.5 was attained." comes from an unpublished 2010 CARB report on premature deaths associated with PM2.5 in California (http://www.arb.ca.gov/research/health/pm-mort/pm-report_2010.pdf). Both the Hall and CARB reports rely primarily on the small positive relationship between PM2.5 and total mortality found in one nationwide study. This is the American Cancer Society's 1982 Cancer Prevention Study (CPS II) that examined PM2.5-related deaths during the 1980s and 1990s. This study has also been used by EPA to set the NAAQS for PM2.5.

The ALA and CAPCOA reports should be modified to reflect the vast amount of null California-specific evidence that now exists. Ten separate analyses of five major cohorts of Californians show that there is no relationship between PM2.5 and total mortality (also known as "premature deaths") in California (www.scientificintegrityinstitute.org/Enstrom081111.pdf). Additional evidence shows that ozone does not cause "premature deaths" in California. For instance, during 2007-11 CARB and AQMD paid \$750,000 for a major epidemiologic study, headed by UC Berkeley professor Michael Jerrett that examined air pollutants and death in the California subjects within ACS CPS II (<http://www.arb.ca.gov/board/books/2007/012507/07-1-4pres.pdf>). The results of this study are contained in an October 2011 final report that found PM2.5 and ozone were not related to total mortality during 1982-2000 among about 75,000 California adults, although the authors of the report have made a somewhat different conclusion about their own findings (<http://wmbriggs.com/blog/?p=4587>).

Thus, a strong case can be made that the current NAAQS are not applicable to California and the South Coast Air Basin and that there are no significant adverse health effects associated with existing pollution levels. Furthermore, any effort to lower the existing levels of ozone and PM2.5 requires very expensive emissions control regulations which have adverse impacts on the California economy. These regulations can be only justified on a cost-benefit basis only if the air pollutants cause "premature deaths." But, as explained above, there are no such deaths in California. Thus, further regulations from CARB and AQMD are not scientifically and economically justified. Nevertheless, CARB has recently implemented multibillion-dollar diesel vehicle regulations designed to reduce PM2.5 (www.forbes.com/2010/06/08/california-diesel-regulation-pollution-opinions-columnists-henry-i-miller-james-e-enstrom.html).

Bonnie Holmes-Gen, executive director of Air Quality and Health for ALA in California, and Dr. Barry Wallerstein, executive officer of AQMD and South Coast APCO, are well-aware of the null California-specific evidence that has been presented to them since 2008. Yet, their latest reports do not contain this evidence and continue to exaggerate the air pollution problem in California. Future versions of these reports should accurately describe the California-specific evidence. Also, the California-specific evidence should be incorporated into the 2012 AQMD Air Quality Management Plan (www.aqmd.gov/aqmp/2012aqmp/index.htm). This plan will be finalized this year, and it is very important that it accurately reflect air pollution health effects in California and fully justify additional air pollution control measures in the South Coast.