

February 13, 2019

Interim President Wanda M. Austin

[president@usc.edu](mailto:president@usc.edu)

Provost Michael W. Quick

[uscprovost@usc.edu](mailto:uscprovost@usc.edu)

University of Southern California

Los Angeles, CA 90089

Re: USC Professors Support SCAQMD and Costly Unjustified Regulations

Dear President Austin and Provost Quick,

I am an accomplished epidemiologist who has had a long academic career at UCLA. In particular, I am an expert on air pollution health effects in California. Since 2005 I have published strong evidence that fine particulate matter (PM2.5) is NOT harmful to Californians and that multi-billion-dollar CARB and SCAQMD PM2.5 regulations are NOT justified. On January 30, 2017 I submitted very detailed null evidence to SCAQMD showing that there is NO scientific, public health, or economic justification for the costly new SCAQMD PM2.5 regulations contained in their 2016 Air Quality Management Plan (<http://scientificintegrityinstitute.org/GhoshAll013017.pdf>).

However, instead of engaging in a professional dialog in order to understand my detailed null evidence, key USC professors simply ignore it and continued to support SCAQMD and its regulations. For example, twelve USC Preventive Medicine professors signed a March 4, 2016 SCAQMD support letter (<https://junkscience.com/2016/09/university-of-california-profs-demand-continuation-of-air-pollution-gravy-train/>). The September 5, 2016 JunkScience analysis of these USC professors reveals that seven of them have received at least \$268 million in air pollution research funding from EPA and NIEHS. I believe that this massive amount of research funding has influenced their research findings and their continuing support for SCAQMD regulations. My belief is reinforced by USC Preventive Medicine Professors Duncan C. Thomas and Kiros T. Berhane, who have failed to respond to my January 3, 2019 and June 27, 2018 email messages shown below. These messages summarize the latest epidemiologic evidence that PM2.5 does not cause premature deaths and that there is NO justification for new SCAQMD regulations.

We are now at a critical point where all Southern California taxpayers may be forced to comply with new unjustified SCAQMD regulations that are paid for with the a one-half-cent sales tax being promoted by SCAQMD (<http://www.dailybulletin.com/aqmd-considers-seeking-a-one-half-cent-sales-tax-in-four-counties-for-clean-air-programs>). If a new regressive sales tax is approved, it will hurt every Southern California taxpayer, particularly the struggling blue collar workers who surround the two USC campuses.

Thus, I request the opportunity to discuss the above issues with you or an appropriate person within your offices. I have copied the relevant USC Preventive Medicine Professors with the hope that they will finally examine and understand my null evidence and publicly oppose the proposed SCAQMD sales tax.

Thank you very much for your consideration.

Sincerely yours,

James E. Enstrom, PhD, MPH, FFACE  
UCLA and Scientific Integrity Institute  
[http://www.scientificintegrityinstitute.org/  
jenstrom@ucla.edu](http://www.scientificintegrityinstitute.org/jenstrom@ucla.edu)  
(310) 472-4274

cc: Duncan C. Thomas <dthomas@usc.edu>  
Kiros T. Berhane <kiros@usc.edu>  
Edward S. Avol <avol@usc.edu>  
W. James Gauderman <jimg@usc.edu>  
Frank D. Gilliland <gillilan@usc.edu>  
Rob S. McConnell <rmcconne@usc.edu>  
Constantinos Sioutas <sioutas@usc.edu>  
Andrea M. Hricko <jfroines@ucla.edu>

----- Forwarded Message -----

From: **James E. Enstrom** <jenstrom@ucla.edu>  
Date: Thu, Jan 3, 2019 at 10:44 AM  
Subject: Request to Assess Evidence of NO PM2.5 Deaths in US  
To: Duncan C. Thomas <dthomas@usc.edu>  
Cc: Kiros T. Berhane <kiros@usc.edu>

January 3, 2019

Duncan C. Thomas, PhD  
Department of Preventive Medicine  
USC School of Medicine  
[dthomas@usc.edu](mailto:dthomas@usc.edu)

Re: Request to Assess Evidence of NO PM2.5 Deaths in US

Dear Dr. Thomas,

I request that you ask Dr. Berhane to respond to my unanswered June 27, 2018 email message regarding my overwhelming evidence of NO PM2.5 Deaths in the US. On October 1, 2018, I presented six sources of null evidence to the PM2.5 Working Group in Washington, DC (<http://www.scientificintegrityinstitute.org/PM25WGJEE100118.pdf>). If Dr. Berhane continues to refuse to reply, then I request your assessment of this evidence. This request is important because the multi-billion-dollar PM2.5 regulations imposed upon Californians by EPA, CARB, SCAQMD, and SJVAPCD are scientifically and economically unjustified. USC professors have played a major role in the research and interpretation of evidence that has led to these unjustified regulations. If I receive no response from you or Dr. Berhane, then I will assume that your unwillingness to address unethical PM2.5 science and regulations is consistent with the recent lack of ethics at the USC School of Medicine (<https://www.latimes.com/local/lanow/la-me-usc-dean-harassment-20171005-story.html>).

Thank you very much for your serious consideration of my serious request.

Sincerely yours,

James E. Enstrom, PhD, MPH, FFACE  
Current EPA SAB Candidate  
UCLA and Scientific Integrity Institute  
[jenstrom@ucla.edu](mailto:jenstrom@ucla.edu)  
(310) 472-4274

**Subject:**FW: Request to Examine Enstrom Evidence of NO PM2.5 Deaths in US  
**Date:** Wed, 27 Jun 2018 14:00:38 -0700  
**From:** James E. Enstrom <[jenstrom@ucla.edu](mailto:jenstrom@ucla.edu)>  
**To:** 'Kiros T. Berhane' <[kiros@usc.edu](mailto:kiros@usc.edu)>

June 27, 2018

Kiros T. Berhane, PhD  
USC Department of Preventive Medicine  
HEI Review Committee  
[kiros@usc.edu](mailto:kiros@usc.edu)

Dear Dr. Berhane,

Dr. Steven N. Goodman, Co-Director of METRICS, has declined my June 13, 2018 request below to have METRICS examine my strong evidence of NO PM2.5 deaths in the US, in spite of the fact that he spoke at the April 30, 2018 HEI Session "Can We Rely on Environmental Health Research?" Since you co-chaired this HEI Session and have extensive expertise in air pollution biostatistics and epidemiology, I request that you examine my evidence, as explained below and in the two attachments. Please let me know if there is a convenient time when we can discuss this evidence via telephone.

Thank you very much for your consideration of this important request.

Sincerely yours,

James E. Enstrom, PhD, MPH, FFACE  
UCLA and Scientific Integrity Institute  
[jenstrom@ucla.edu](mailto:jenstrom@ucla.edu)  
(310) 472-4274

**From:** James E. Enstrom <jenstrom@ucla.edu>  
**Sent:** Wednesday, June 13, 2018 12:11 PM  
**To:** 'Steven N. Goodman' <steve.goodman@stanford.edu>  
**Subject:** Request to Examine Enstrom Evidence of NO PM2.5 Deaths in US

June 13, 2018

Steven N. Goodman, MD, PhD  
Co-Director, METRICS  
[steve.goodman@stanford.edu](mailto:steve.goodman@stanford.edu)

Dear Dr. Goodman,

I am writing as a follow-up to my telephone call Tuesday afternoon regarding your April 30, 2018 HEI Presentation "What Does Research Reproducibility Mean?" Your Slide 3 shows that the first "Criteria for reproducible epidemiologic research" is "Analytical data set is available." As explained in my attached March 28, 2017 Dose-Response article, I obtained an analytical data set for the ACS CPS II cohort and showed that there is NO robust relationship between PM2.5 and total mortality in the CPS II cohort. My findings challenge the validity of the 1995 AJRCCM Pope article, the 2000 HEI Reanalysis Report, and the 2009 HEI Research Report 140, as described in the attachment. The April 30, 2018 HEI Presentation by Richard T. Burnett "Particulate Matter Reproducibility and Air Pollution Epidemiology" OMITTS all reference to my Dose-Response article and other relevant research since 2005. His Slide 12 deliberately exaggerates the relationship between PM2.5 and total mortality in the US. My second attachment presents my reanalysis of Burnett's Slide 12 and shows that there is NO current relationship between PM2.5 and total mortality in the US. I want to present my Dose-Response article to HEI staff and affiliates, but HEI will not allow me to do so.

All of this casts doubt upon the reliability of air pollution epidemiology which has been used to establish EPA regulations. Please make a preliminary assessment of my attachments, both of which are relevant to the proposed EPA Rule "Strengthening Transparency in Regulatory Science." Hopefully, a METRICS Team Member can examine these attachments in detail and give me their assessment.

Thank you very much for your consideration and assistance.

Sincerely yours,

James E. Enstrom, PhD, MPH, FFACE  
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[jenstrom@ucla.edu](mailto:jenstrom@ucla.edu)  
(310) 472-4274