Western States TRUCKING ASSOCIATION

334 N. Euclid Avenue • Upland, CA 91786
(909) 982-9898 • Fax (909) 985-2348
www.westrk.org

January 5, 2018

Environmental Protection Agency
Air and Radiation Docket Information Center
EPA/DC, EPA WJC West Building
1301 Constitution Ave. NW., Room 3334
Washington D.C.

RE: EPA-HQ-OAR-2014-0827 – Repeal of Emissions Requirements for Glider Vehicles, Glider Engines, and Glider Kits

The *Western States Trucking Association* ("WSTA")[1] supplies these comments in response to a proposed rule to repeal emissions requirements for glider vehicles, glider engines, and glider kits published in the Federal Register on November 16, 2017.

The WSTA is supportive of the Environmental Protection Agency ("EPA" or "Agency") repealing requirements on glider kitted truck originally finalized in the EPA's Fuel Efficiency Standards for Medium and Heavy-Duty Engines and Vehicles Phase 2.

Our primary reasoning behind supporting the repeal is that we believe EPA overstepped its legal authority under section 202(a) of the Clean Air Act ("CAA") and illegally extended its authority to regulate glider kits as new vehicles – which they are not - by reinterpreting what constitutes a new motor vehicle.

Secondarily, EPA relies on outdated emissions data and secretive (and flawed) health affects studies to attempt and make specious justifications of negative health effects from the continued use of glider kitted commercial motor vehicles.

Finally, even if EPA were to affirm its authority under the CAA to regulate glider kits as new motor vehicles, all it would accomplish, besides destroying a boutique manufacturing business model, is to cause an entirely new enterprise to develop focused on completely rebuilding existing older model trucks to meet market demands for less expensive trucks and more reliable engines.

Section 202(a) of the Clean Air Act

Glider kitted trucks have been utilized for decades by truck owners as a way to salvage valuable drive line componentry when the vehicle chassis has either aged beyond usefulness or been damaged as a result of a vehicle crash. Mostly the end users of glider kits are small-businesses. The EPA in Phase 2 sought to placate environmentalist fear mongering that recycling existing drive line componentry somehow has/will result in decreased air quality and hypothesized increased mortality claims from their use.

A glider kit is nothing more than a new vehicle chassis, something section 202(a) of the CAA doesn't allow the EPA to regulate since without an engine it is not a motor vehicle.[2] The engine installed in a

[1] The *Western States Trucking Association* is the oldest, independent nonprofit trucking association in the U.S. founded in 1941. We are headquartered in Upland, CA. Our nearly 6,000 member and affiliated motor carriers are engaged in virtually every mode of trucking including construction, port drayage, cross-border, general freight, heavy-haul and agricultural operations. The majority of our members are classified as small-businesses.

glider may or may not have been rebuilt but in any case the engine was originally manufactured under EPA requirements. Whether the engine is rebuilt within the existing chassis that it was originally installed in, or transferred to another vehicle chassis (even a glider kit), regulating glider kits is nothing more than a backdoor attempt by the EPA to place an illegal "shelf-life" on all diesel engines in order to placate environmentalist and new truck dealerships publicly opposed to glider kits for nothing more than economic reasons – they don't sell them and don't want the competition in the marketplace.

Emissions and health effects

The EPA's modeling for the original rulemaking was based on emissions data from 1998. Utilizing data that is nearly 20 years old would never suffice in any legitimate analysis and yet the EPA thought it was sufficient here. Another problem with using this data was that it meant the Phase 2 Rule did not account for lower emissions resulting from EPA's own ultra-low-sulfur diesel rule. Beginning in 2006, EPA required that diesel fuel refiners produce fuels with a 97% lower sulfur content. This reduction of sulfur significantly reduced the amount of NOx, PM, and other pollutants emitted from diesel engines, including gliders and other heavy-duty truck tractors. In its zeal to gin up an illusory cost-benefit justification, the EPA utilized old, inapplicable emission data from 1998.

The docket has studies alleging a corollary exists between exposure to diesel exhaust and increased mortality. These studies are used to further an objective to generate a favorable cost-benefit analysis – something we've witnessed in many state and federal environmental regulatory proposals. There is an assumption evident in the docket that a linkage exists and its accepted science equating diesel exhaust exposure with increased mortality since opposing research is clearly disregarded by EPA. Thoughtful, contradictory, and openly transparent studies showing no relationship to $PM_{2.5}$ exposure and increased mortality are ignored by EPA because absent the relationship preferred by environmental agencies it's difficult to attempt and justify many onerous rules and their costs on society.

We have appended our comments with letter by James E. Enstrom. Ph.D., M.P.H, UCLA and Scientific Integrity Institute to the South Coast Air Quality Management District regarding his extensive and well cited work finding no relationship between $PM_{2.5}$ exposure and increased mortality in California. He is not alone as a researcher in questioning the base assumptions utilized by environmental agencies to regulate many facets of everyday life using research solely funded by the same agencies wishing to regulate - even congress is stepping into this debate regarding clear conflicts of interests by researchers beholden financially to government agencies for their research that is used as the basis to regulate.

On March 8th, 2017, H.R. 1431 - EPA Science Advisory Board Reform Act of 2017 was introduced in congress. The bill would amend the Environmental Research, Development, and Demonstration Authorization Act of 1978 to revise the process of selecting members of EPA's Science Advisory Board, guidelines for participation in board advisory activities, and terms of office. The board is supposed to provide scientific advice to the Environmental Protection Agency (EPA). This bill requires the board to independently provide that advice.

It's beyond ironic that researchers who must rely on private sector funding for their research have their objectivity questioned and dismissed out-of-hand because of who funded it, yet researchers completely reliant on funding from the EPA (and other environmental groups/agencies) are somehow beyond reproach and not influenced or beholden to their paymasters?

[2] We'd note that EPA has also attempted to regulate "trailers" as motor vehicles in Phase 2. In October 2017 the Truck Trailer Manufacturers Association was successful in getting the Court of Appeals for the District of Columbia to halt implementation of Phase 2 as it relates to regulating trailers for the first time as "motor vehicles."

Many commenters in the docket have clearly echoed "talking points" related to negative health effects of glider kitted trucks, in some instance making outlandish claims about "thousands of premature deaths" should EPA reverse itself and not regulate these types of vehicles.

One of the myriad of reasons many American's don't take seriously concerns of climate change from environmental agencies is the very obvious practice of shutting out dissent, especially with regard to transparent scientific studies that are subject to extensive peer review – both pro and con. Another reason is the consistency in making bold overstatements related to facts.

An example of a complete overstatement of fact found in the docket are California air quality regulators making ludicrous claims of how reversing EPA's original decision in Phase 2 related to glider kitted trucks will somehow make it difficult for them to meet air quality goals. These claims are ludicrous precisely because the trucks in question cannot be legally operated within California without having a diesel particulate filter installed. A reversal by EPA related to glider kits has zero environmental effect in California because of the Air Resources Board Statewide Truck and Bus regulation.

We believe that EPA's conclusions related to negative health effects from glider kits in this docket are at best an opinion not rooted in meaningful science.

Rebuilding existing trucks

Since a glider is nothing more than a new truck chassis with older drive line componentry added, should EPA reaffirm its authority to regulate these types of vehicles, truck owners would logically simply choose to rebuild existing older trucks and EPA would destroy an industry employing thousands for little or no appreciable effect on air quality.

The process of rebuilding an existing truck is no different than automobile enthusiast who take old vintage cars and bring them back to "like new" condition. Glider kits simply allow a truck owner to maximize their investment in driveline componentry. Absent the ability to purchase and use a newer chassis – very often a chassis much more aerodynamic than the vehicle it replaced (reducing GHG from continued operation), older trucks will simply be utilized and reconditioned.

Conclusion

Small-business truck owners support many clean air goals – they don't want dirty air, they just have a different way than their larger competitors at achieving emissions reductions while maintaining business viability. However, the past 8-9 years has seen their business model under assault from a wide range of groups; air quality regulators, environmentalists, union activists, and not so ironically – their larger fleet competitors and their representatives who all share a similar vision: eliminate small-businesses.

The original EPA regulation of glider kits is nothing more than a grand example of government overreach absent legal authority by simply choosing to expand its interpretations of the CAA in order to unnecessarily regulate (and harm) small-businesses.

We encourage EPA to rescind its authority over glider kitted trucks.

Respectfully submitted,

Joe Rajkovacz

Joe Rajkovacz
Director of Governmental Affairs

INTEGRITY ◊ PROFESSIONALISM ◊ EDUCATION ◊ SAFETY

August 15, 2016

Jo Kay Chan Ghosh, Ph.D.
Health Effects Officer
South Coast Air Quality Management District
jghosh@aqmd.gov

Dear Dr. Ghosh,

I am writing to express serious concern that my July 26, 2016 public comments below regarding the health effects/impacts of particulate matter in the South Coast Air Basin (SCAB) are not being addressed. In particular, the August 16, 2016 PPT by Dr. Elaine Shen Update on the Preliminary Draft Socioeconomic Report claims that there will be 2,111 premature deaths due to PM2.5 in 2023. This is the same number of deaths shown in the attached July 28, 2016 PPT slide by Dr. Anthony Oliver Preliminary Public Health Benefits of the Draft 2016 AQMP . This scientifically invalid claim does not provide valid public health justification for a 2016 AQMP that will impose an estimated $38.2 billion in compliance costs on the SCAB economy.

Since 2006 I have repeatedly presented to CARB and SCAQMD strong epidemiologic evidence that there is no relationship between PM2.5 and total mortality in California. The latest version of this evidence is the attached table with 16 null results and 1 essentially null result from six different California cohorts (http://scientificintegrityinstitute.org/NoPMDeaths081516.pdf). Seven of the null results come from studies that were partially funded by SCAQMD. In addition, a very strong case has recently been made by nine accomplished experts, including myself, that "Particulate Matter Does Not *Cause* Premature Deaths" (https://www.nas.org/articles/nas_letter). Furthermore, I have now submitted for publication a manuscript with null findings that invalidate the positive nationwide relationship between PM2.5 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 PM2.5 premature death claims in the PPTs of Drs. Oliver and Shen.

All epidemiologic evidence relevant to the SCAB must be properly presented and summarized in the revised Draft 2016 AQMP Appendix I Health Effects (http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/DRAFT2016AQMP/appi.pdf?sfvrsn=2). Indeed, Appendix I must be finalized in strict compliance with all provisions of California Health and Safety Code (CHSC) Section 40471 (b): "On or before December 31, 2001, and every three years thereafter, as part of the preparation of the air quality management plan revisions, 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. The south coast district board shall submit its report to the advisory council appointed pursuant to Section 40428 for review and comment. The advisory council shall undertake peer review concerning the report prior to its finalization and public release. The south coast district board shall hold public hearings concerning the report and the peer review, and shall append to the report any additional material or information that results from the peer review and public hearings." (http://www.leginfo.ca.gov/cgi-bin/displaycode?section=hsc&group=40001-41000&file=40460-40471).

As I have previously requested, the 2016 AQMP must present current data on the average human exposure levels for PM2.5, ozone, and NOx in the SCAB. My evidence dating back decades indicates that the actual human exposure levels are far below the EPA National Ambient Air Quality Standards (NAAQS) and well below the levels for which there are proven adverse health effects. Furthermore, the tiny health effects of air pollution must be put into perspective with all the factors that influence human health, such as, employment, and with the fact that the SCAB has 2014 age-adjusted death rates for all causes, all cancer, and all respiratory diseases that are among the lowest in the entire US. These low death rates are summarized the attached table.

The ultimate scientific and regulatory fate of the 2016 depends upon the scientists who have conducted air pollution epidemiology research and upon the SCAQMD scientists who summarize these research findings in Appendix I Health Effects. We will soon find out if the SCAQMD scientists have the honesty and integrity to state that air pollution *does not cause* premature deaths in the SCAB, that the average daily human exposures to PM2.5, ozone, and NOx in the SCAB are well below the levels that *cause* adverse health effects, and that tougher air pollution regulations in the already healthy SCAB are not justified on a public health or socioeconomic basis.

In closing, please read my attached July 19, 2016 statement to the BizFed Southern California Business Coalition "AQMD Must Reassess Its Air Quality Regulations" and the attached page summarizing my scientific credentials and academic career.

Thank you very much for your consideration.

Sincerely yours,

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

cc: Elaine Shen <eshen@aqmd.gov>
Shah Dabirian <sdabirian@aqmd.gov>
Anthony Oliver <aoliver@aqmd.gov>
Philip M. Fine <pfine@aqmd.gov>
Wayne Nastri <wnastri@aqmd.gov>
Henry A. Roman <har@indecon.com>
George D. Thurston <George.Thurston@nyumc.org>
Kevin R. Cromar <kevin.cromar@nyu.edu>
AQMP Comment <aqmp@aqmd.gov>

July 26, 2016

Anthony Oliver, Ph.D.
SCAQMD Air Quality Specialist
aoliver@aqmd.gov

Dear Dr. Oliver,

I am an environmental epidemiologist and physicist who has had a long career at UCLA and I am an expert in the health effects of air pollution in California. I am writing regarding your planned presentation "Item #3: Preliminary Public Health Benefits of the Draft 2016 AQMP" at the July 28, 2016 SCAQMD Scientific, Technical & Modeling Peer Review Advisory Group (STMPR) Socioeconomic Meeting (http://www.aqmd.gov/home/library/meeting-agendas-minutes/agenda?title=STMPRSocio_072816). I challenge the validity of your "Preliminary Health Impacts – Mortality" and your selective use of Jerrett 2005, Jerrett 2009, and Jerrett 2013.

Key aspects of my prior criticism of SCAQMD STMPR claims regarding the health impacts of PM2.5 and ozone in the South Coast Air Basin (SCAB) are contained in these three documents:

November 16, 2015 Enstrom Email to Cassmassi and SMTPR Staff re Ozone and PM in SCAB (http://www.scientificintegrityinstitute.org/Cassmassi111615.pdf)
November 22, 2015 Enstrom Table with 2000-2015 Results Showing NO PM2.5 Premature Deaths in CA (http://www.scientificintegrityinstitute.org/NoPMDeaths112215.pdf)
December 15, 2015 Enstrom Email to Roman Requesting NO IEc PM2.5 and Ozone Deaths for 2016 AQMP (http://www.scientificintegrityinstitute.org/Roman121515.pdf)

I strongly recommend that you carefully read all three documents, as well as all the weblinks that they contain. Then I strongly recommend that you discuss these documents with me, as well as with SCAQMD Health Effects Officer Jo Kay Chan Ghosh and IEc Principal Henry A. Roman. Finally, I strongly recommend that you announce during your presentation that several highly qualified doctoral-level scientists, including myself, are challenging the validity of your presentation, particularly your claims of "Premature Mortalities" in the SCAB.

Thank you very much for your attention to this important matter.

Sincerely yours,

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

cc: Jo Kay Chan Ghosh <jghosh@aqmd.gov>
Henry A. Roman <har@indecon.com>
George D. Thurston <George.Thurston@nyumc.org>
Elaine Shen <eshen@aqmd.gov>
Philip M. Fine <pfine@aqmd.gov>
Wayne Nastri <wnastri@aqmd.gov>

Preliminary Health Impacts - Mortality

- Health impacts for mortality are based on the previous data and:
  - Ozone: Pooling of L.A.-specific NMMAPS and meta-analysis estimates from Bell et al. (2005).
  - $PM_{2.5}$: Pooling of Jerrett et al. (2005), Jerrett et al. (2013), and Kriging and LUR estimates from Krewski et al. (2009).

- No threshold effects assumed for either pollutant
  - IEc recommendation based on latest scientific evidence
  - U.S. EPA's practice

> In the absence of substantial information in the scientific literature on alternative forms of C-R functions at low O3 concentrations, the best estimate of the C-R function is a linear, no-threshold function.
>
> U.S. EPA, 2014 Health Risk and Exposure Assessment for Ozone

Note: Confidence intervals provided on supplementary handout.

Preliminary Health Impacts – Mortality (cont'd)

Premature Mortalities Avoided		
	2023	2031
Mortality, All Cause	2193	2563
Short-term Ozone Exposure	51	87
Los Angeles	22	40
Orange	10	14
Riverside	11	16
San Bernardino	9	15
Long-term $PM_{2.5}$ Exposure	2111	2425
Los Angeles	1481	1707
Orange	321	356
Riverside	141	166
San Bernardino	169	197

Note: Confidence intervals provided on supplementary handout.

Summary Table. Epidemiologic cohort studies of PM2.5 and total mortality in California, 2000-2016
Relative risk of death from all causes (RR and 95% CI) associated with increase of 10 μg/m³ in PM2.5
(http://scientificintegrityinstitute.org/NoPMDeaths112215.pdf)

Krewski 2000 & 2010 CA CPS II Cohort N=40,408 RR = 0.872 (0.805-0.944) 1982-1989
(N=[18,000 M + 22,408 F]; 4 MSAs; 1979-1983 PM2.5; 44 covariates)

McDonnell 2000 CA AHSMOG Cohort N~3,800 RR ~ 1.00 (0.95 – 1.05) 1977-1992
(N~[1,347 M + 2,422 F]; SC&SD&SF AB; M RR=1.09(0.98-1.21) & F RR~0.98(0.92-1.03))

Jerrett 2005 CPS II Cohort in LA Basin N=22,905 RR = 1.11 (0.99 - 1.25) 1982-2000
(N=22,905 M & F; 267 zip code areas; 1999-2000 PM2.5; 44 cov + max confounders)

Enstrom 2005 CA CPS I Cohort N=35,783 RR = 1.039 (1.010-1.069) 1973-1982
(N=[15,573 M + 20,210 F]; 11 counties; 1979-1983 PM2.5) RR = 0.997 (0.978-1.016) 1983-2002

Enstrom 2006 CA CPS I Cohort N=35,783 RR = 1.061 (1.017-1.106) 1973-1982
(11 counties; 1979-1983 & 1999-2001 PM2.5) RR = 0.995 (0.968-1.024) 1983-2002

Zeger 2008 MCAPS Cohort "West" N=3,100,000 RR = 0.989 (0.970-1.008) 2000-2005
(N=[1.5 M M + 1.6 M F]; Medicare enrollees in CA+OR+WA (CA=73%); 2000-2005 PM2.5)

Jerrett 2010 CA CPS II Cohort N=77,767 RR ~ 0.994 (0.965-1.025) 1982-2000
(N=[34,367 M + 43,400 F]; 54 counties; 2000 PM2.5; KRG ZIP; 20 ind cov+7 eco var; Slide 12)

Krewski 2010 (2009) CA CPS II Cohort
(4 MSAs; 1979-1983 PM2.5; 44 cov) N=40,408 RR = 0.960 (0.920-1.002) 1982-2000
(7 MSAs; 1999-2000 PM2.5; 44 cov) N=50,930 RR = 0.968 (0.916-1.022) 1982-2000

Jerrett 2011 CA CPS II Cohort N=73,609 RR = 0.994 (0.965-1.024) 1982-2000
(N=[32,509 M + 41,100 F]; 54 counties; 2000 PM2.5; KRG ZIP Model; 20 ind cov+7 eco var; Table 28)

Jerrett 2011 CA CPS II Cohort N=73,609 RR = 1.002 (0.992-1.012) 1982-2000
(N=[32,509 M + 41,100 F]; 54 counties; 2000 PM2.5; Nine Model Ave; 20 ic+7 ev; Fig 22 & Tab 27-32)

Lipsett 2011 CA Teachers Cohort N=73,489 RR = 1.01 (0.95 – 1.09) 2000-2005
(N=[73,489 F]; 2000-2005 PM2.5)

Ostro 2011 CA Teachers Cohort N=43,220 RR = 1.06 (0.96 – 1.16) 2002-2007
(N=[43,220 F]; 2002-2007 PM2.5)

Jerrett 2013 CA CPS II Cohort N=73,711 RR = 1.060 (1.003–1.120) 1982-2000
(N=[~32,550 M + ~41,161 F]; 54 counties; 2000 PM2.5; LUR Conurb Model; 42 ind cov+7 eco var+5 metro; Table 6)

Jerrett 2013 CA CPS II Cohort N=73,711 RR = 1.028 (0.957-1.104) 1982-2000
(same parameters and model as above, except including co-pollutants NO2 and Ozone; Table 5)

Ostro 2015 CA Teachers Cohort N=101,884 RR = 1.01 (0.98 -1.05) 2001-2007
(N=[101,881 F]; 2002-2007 PM2.5) (all natural causes of death)

Thurston 2016 CA NIH-AARP Cohort N=160,209 RR = 1.02 (0.99 -1.04) 2000-2009
(N=[~95,965 M + ~64,245 F]; full baseline model: PM2.5 by zip code; Table 3) (all natural causes of death)

Enstrom 2016 unpub CA NIH-AARP Cohort N=160,368 RR = 1.001 (0.949-1.055) 2000-2009
(N=[~96,059 M + ~64,309 F]; full baseline model: 2000 PM2.5 by county)

2014 Age-Adjusted Death Rates by State and County

Deaths per 1,000 persons (age-adjusted using 2000 U.S. Standard Population)
with 95% Confidence Interval shown in parentheses
(http://wonder.cdc.gov/ucd-icd10.html)

August 6, 2016

Location	2014 Age-Adjusted Death Rate (95% Confidence Interval)		
	All Causes	All Cancer	All Respiratory
	ICD-10=All Codes	ICD-10=C00-D48	ICD-10=J00-J98
United States (50 States + DC)	7.25 (7.24-7.26)	1.66 (1.65-1.66)	0.71 (0.71-0.71)
California (2nd lowest State)	6.06 (6.03-6.08)	1.48 (1.46-1.49)	0.57 (0.56-0.57)
South Coast Air Basin (Los Angeles, Orange, Riverside, and San Bernardino Counties)	5.93	1.46	0.55
Hawaii (Lowest State)	5.89 (5.77-6.00)	1.44 (1.38-1.49)	0.53 (0.50-0.56)
Los Angeles County	5.71 (5.66-5.75)	1.42 (1.40-1.44)	0.53 (0.52-0.55)
Orange County	5.48 (5.40-5.56)	1.38 (1.34-1.42)	0.47 (0.45-0.49)

Presentation to Southern California Business Coalition on SCAQMD and 2016 AQMP

"AQMD Must Reassess Its Air Quality Regulations"

James E. Enstrom, Ph.D., M.P.H.
UCLA and Scientific Integrity Institute
jenstrom@ucla.edu

July 19, 2016

The South Coast Air Quality Management District (AQMD), one of the most powerful regulatory agencies in the United States, has just proposed tightening its regulations. During the past 40 years it has implemented strong air quality regulations in the 11,000 square-mile South Coast Air Basin (SCAB), which includes the 17 million people who live in the populated areas of Los Angeles, Orange, Riverside, and San Bernardino counties. These increasingly aggressive and costly regulations have impacted all sectors of the economy, from utility power plants, oil refineries, the ports, and all manufacturers to restaurants, dry cleaners, printers, and auto repair shops. While these regulations have improved air quality substantially, they have been excessive and have contributed to the loss of more than half of the manufacturing jobs in Southern California.

The regulation of fine particulate matter ($PM_{2.5}$), ozone (O_3), and nitrogen oxides (NO_x) has been largely justified on a cost-benefit basis by the claim that air pollution causes 5,000 premature deaths per year in the SCAB. This claim relies on the implausible and unproven hypothesis that inhalation over a lifetime of about one teaspoon of $PM_{2.5}$ (particles less than 2.5 microns in diameter) causes premature death. For perspective, inhaling this amount of $PM_{2.5}$ is roughly equivalent to smoking two cigarettes a year, certainly not a lethal dose. Moreover, there is overwhelming epidemiological evidence, including two large 2011 AQMD-funded epidemiological studies, that air pollution does not cause any premature deaths in California. Furthermore, the SCAB has an age-adjusted total death rate that is lower than the death rate in every state except Hawaii. It has a similarly low total cancer death rate.

Regarding exposures, the average ambient levels of 8-hour ozone and 24-hour $PM_{2.5}$ in the SCAB, as measured by AQMD monitors, are below the current Environmental Protection Agency (EPA) National Ambient Air Quality Standards (NAAQS) for ozone and $PM_{2.5}$. Furthermore, the average personal exposures to ozone and $PM_{2.5}$ among SCAB residents are much lower than the ambient levels measured by AQMD monitors. These average personal exposure levels are far below the levels associated with adverse health effects. Air pollutants are now at record low levels and close to natural background levels. The last Stage 3 smog alert was in 1974 and the last Stage 2 smog alert was in 1988. Much of the remaining SCAB pollution comes across the Pacific Ocean from China, which ignores air pollution regulations and which does much of the manufacturing that used to be done here.

Unfortunately, the AQMD staff, led since 1997 by Executive Officer Barry R. Wallerstein, has ignored the extremely positive air quality evidence above. Instead of acting in the best public health and socioeconomic interest of the SCAB residents, AQMD staff has implemented scientifically unjustified regulations in conjunction with the EPA, the California Air Resources Board, and powerful environmental activist groups (like Coalition for Clean Air, American Lung Association, Natural Resources Defense Council, and Sierra Club). The AQMD Board justifiably fired Wallerstein on March 4. There is now an opportunity for the remaining AQMD staff to work with numerous qualified experts like myself in order to reassess the scientific validity of all their regulations. The REgional CLean Air Incentives Market (RECLAIM), the Multiple Air Toxics Exposure Study (MATES), and the 2012 Air Quality Management Plan (AQMP) all need to be reassessed. These reassessments must be made before the 2016 AQMP is finalized and, if they are not made, the AQMD Board should not approve the 2016 AQMP. It is time to stop unjustified regulations in Southern California and to bring manufacturing jobs back.

Guest Speaker: James E. Enstrom, Ph.D., M.P.H.

Dr. Enstrom is a native Californian who has lived most of his life in Los Angeles County. In 1965 He graduated co-valedictorian of his class at Harvey Mudd College in Claremont, CA, where he obtained a B.S. in physics. In 1970 Dr. Enstrom obtained his Ph.D. in experimental elementary particle physics at Stanford University from Nobel Laureate Melvin Schwartz. During 1971-1973 he worked as a physicist at the Lawrence Berkeley Laboratory in research group of Nobel Laureate Luis Alvarez. He then came to the UCLA School of Public Health as a postdoctoral fellow in cancer epidemiology and received an M.P.H. and postdoctoral certificate in 1976 from renowned public health epidemiologist Dr. Lester Breslow.

He then joined the UCLA School of Public Health faculty as a Research Professor / Researcher and he held that position for 36 years until June 2012. He currently retains a similar affiliation with UCLA, although he is now drawing retirement. He has been a Fellow of the American College of Epidemiology since 1981, he has been listed in Who's Who in America since 1990, and he has been President of the Scientific Integrity Institute in Los Angeles since 2005.

During his long career, he has explored many important epidemiological issues, particularly focusing on California. A major theme of his research has been identifying healthy lifestyles. He has shown that it is possible to reduce mortality risk from cancer and heart disease by 70% in the middle age range and to increase longevity by as much as 10 years. Examples of healthy populations that he has examined include religiously active California Mormons, California Cancer Prevention Study subjects, California PREVENTION Magazine Readers, and California and national samples of adults adhering to good health practices.

He has also examined the influence of environmental factors on mortality. In December 2005 he published a major paper on fine particulate matter and mortality in California and he has numerous other fm. Since then he has conclusively documented that fine particulate matter does not cause premature death in California. Since 2013, following the lead of the US House Science Committee, he has been involved with efforts to obtain the access to the "secret science" data that EPA has used to justify its fine particulate and ozone air pollution regulations in California and the United States. These efforts include the August 1, 2013 House subpoena of EPA, as well as the Secret Science Reform Acts of 2014 and 2015.

He is currently conducting important new air pollution epidemiology research that is relevant to the EPA, CARB, and SCAQMD regulations. More information can be found at his Scientific Integrity Institute website (http://www.scientificintegrityinstitute.org/).