

## **Comment 1 for PM2.5 Area Designation Recommendations for the Revised Federal Annual PM2.5 Standard (pm2.5fed9ugstandard) - Non-Reg.**

First Name: Brian

Last Name: Centeno

Email Address: invinoetveritas@gmail.com

Affiliation: Citizen

Subject: Elimination of private farming, transport

Comment:

It is evident that the activities of this committee serve the interests of the CARB, which in turn serves the interests of the ecology lobby. A narrative of global calamity is being used to promulgate coercive policies that will impoverish and repress the California public, as well as the citizens of the states that adhere to California's outrageous environmental regulations. You are unelected bureaucrats and assigned political toadies, who reveal your fanatical pseudo religious motives with ad absurdum studies of dust being raised by tractors in the production of food. In the meantime, China and India spew coal dust and particulates, VOCs all, into the atmosphere, and the planet itself spews volcanic toxins into the atmosphere. I and many others oppose you in the legal and public sphere for your demoniacal stupidity. May your efforts be met with the derision they deserve.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-12-19 14:29:14

No Duplicates.

**Comment 2 for PM2.5 Area Designation Recommendations for the Revised Federal Annual PM2.5 Standard (pm2.5fed9ugstandard) - Non-Reg.**

First Name: Yushuo  
Last Name: Chang  
Email Address: ychang@placer.ca.gov  
Affiliation: PCAPCD

Subject: PCAPCD Support Letter  
Comment:

The support letter from PCAPCD for this Board item is attached.

Sincerely,

Yushuo Chang  
Planning and Monitoring Section Supervisor  
Placer County Air Pollution Control District

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/2-pm2.5fed9ugstandard-USECZwBgBSZVMARg.pdf>'

Original File Name: PCAPCD - Dr. Steven Cliff CARB Support Ltr 1-3-25.pdf

Date and Time Comment Was Submitted: 2025-01-03 11:37:20

No Duplicates.

**Comment 3 for PM2.5 Area Designation Recommendations for the Revised Federal Annual PM2.5 Standard (pm2.5fed9ugstandard) - Non-Reg.**

First Name: Yushuo  
Last Name: Chang  
Email Address: ychang@placer.ca.gov  
Affiliation: PCAPCD

Subject: PCAPCD Support Letter  
Comment:

The Placer County Air Pollution Control District supports the proposed State Area Designation Recommendation for the revised Federal annual PM2.5 standard.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/3-pm2.5fed9ugstandard-AXEHYIMzBSZQNQVh.pdf>'

Original File Name: PCAPCD - Dr. Steven Cliff CARB Support Ltr 1-3-25.pdf

Date and Time Comment Was Submitted: 2025-01-06 09:14:53

No Duplicates.

**Comment 4 for PM2.5 Area Designation Recommendations for the Revised Federal Annual PM2.5 Standard (pm2.5fed9ugstandard) - Non-Reg.**

First Name: Benjamin  
Last Name: Beattie  
Email Address: bbeattie@ysaqmd.org  
Affiliation: Yolo-Solano AQMD

Subject: YSAQMD Support Letter  
Comment:

On behalf of Gretchen Bennett, Air Pollution Control Officer for the Yolo-Solano Air Quality Management District, please accept this support letter for the PM2.5 Area Designation Recommendation for YSAQMD.

Sincerely,

Benjamin Beattie  
Engineering Manager  
Yolo-Solano Air Quality Management District

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/4-pm2.5fed9ugstandard-UjFVMgFyBTQDWgl6.pdf>'

Original File Name: CARB Support Letter 2024 PM NAAQS\_Final.pdf

Date and Time Comment Was Submitted: 2025-01-07 15:26:36

No Duplicates.

# Comment 1 for PM2.5 Area Designation Recommendations for the Revised Federal Annual PM2.5 Standard (pm2.5fed9ugstandard). (At Hearing)

First Name: John  
Last Name: Dunn  
Email Address: jddmdjd@web-access.net  
Affiliation: Heritage Foundation, Heartland Institute

Subject: New small particle regs proposed by EPA  
Comment:

On 1/13/2025 5:28 PM, ARB SIP Planning wrote:

>  
> John Dale Dunn MD JD  
>  
> Diplomate ABEM, ABLM  
>  
> Admitted but inactive, Texas and Louisiana Bars  
>  
> Texas Courts Certified Mediator  
>  
> Consultant Emergency Services, Peer Review  
>  
>  
> Rocky Hill Road 401  
Lake Brownwood, Texas 76801  
>  
> Phone 325 784-6697  
>  
> E-mail jddmdjd@web-access.net  
>  
>  
> January 5, 2025  
>  
> Ladies and Gents of the CARB and its researchers,  
>  
> I respond to the CARB invitation to a workshop public comment session, apparently intended to explain and justify another reduction in small particle allowable levels. I am reminded of a similar event in 2010 when CARB was engaged in a debate with members of the scientific and business community in the midst of a CARB campaign to show small particles were lethal and harmful and CA must control small particle air pollution to reduce the deaths and toxic effects.  
>  
> CARB lost that debate when their all-star panel couldn't prove its case. They lost the debate because a bunch of us who know junk science when we see it came to the party and showed up the CARB shills. However, not to be deterred CARB and its designated science officials and operatives licked their wounds and commissioned Dr. Jarrett and others to gin up another study to prove they were right and the critics were wrong. Jarrett did a

typical uncontrolled population study and data dredged temporal-spatial data to get a small non-proof relative risk/hazard ratio--it was a joke study that cost 750 K.

>

> I am a physician attorney and I know how multiple sampling (data dredging) in uncontrolled population studies can create "associations" measured as relative risk. I am familiar with CARB scientist use of small associations from big studies cobbled together so that the researcher can claim a small p value and sacred "statistical significance." Jarrett et.al ginned up small associations by data dredging combined with p hacking to produce a hilarious repeat of other CARB studies, but the researchers proudly announced that the study results were "statistically significant" pretending that was the equivalent of material, relevant, competent and probitive evidence. The magic proposed was that statistical significance is equivalent to reliable truth on the issue of causation. Stop the music--that is not so and everyone who reads this email knows that it is not so. Even a college level student of epidemiological methods would know what CARB was doing--big uncontrolled studies, multiple sampling, p hacking, bragging on inadequate relative risk results, Richard Feynman called it cargo cult science.

>

> Best part of the story is publishing results with confidence intervals that included a RR of 1.0, the researchers putting lipstick on a statistical pig.

>

> Here are the commentary and letters I wrote in 2011, not new because CARB is still the same junk science research and policy/regulation making machine, popping out bad studies and regs like a PEZ dispenser while beating the big scare drum:

>

> . Critiques of Final Report for CARB Contract No. 06-332

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(<http://www.scientificintegrityinstitute.org/JerrettCriticism102811.pdf>)

> (<http://www.scientificintegrityinstitute.org/Dunn060911.pdf>)

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> . October 26, 2011 Second Dunn Critique

>

> (Summary read by Hank de Carbonel on October 28, 2011

(<http://www.scientificintegrityinstitute.org/Dunn102611.pdf>)

>

> . June 9, 2011 verbal comments by Dr. Enstrom, Dr. Matthew A. Malkan of UCLA, Mr. Brown,

>

> and Dr. Dunn as read by Hank de Carbonel

(<http://www.scientificintegrityinstitute.org/CARBRSC060911.mp3>)

>

> . October 28, 2011 verbal comments read for Drs. Enstrom, Malkan, Dunn, Lipfert, and Fulks, and Mr. Brown

(<http://www.scientificintegrityinstitute.org/CARBRSC102811.mp3>)

or(<http://www.cdtoa.org/CARBdocs/2011-10-28-SRatCARBreJerret.MP3>)

>

> In these commentaries I point out Michael Jarrett's team's creative effort to do spatial-temporal jiggering and sampling to produce small no proof but positive associations. I think it a shame and disgrace that CARB and its hired research operatives have no respect for the rules advocated in the Reference Manual on Scientific Evidence, published by the Federal Judicial Center that advocates respecting the Bradford Hill rules on proving causation and basic rules on how to manage and evaluate data. Small relative risks in uncontrolled population studies are well known to be no

proof and legitimate epidemiology requires Relative Risks of 3 or more as robust enough. CARB continues to just pretend they are sponsoring good science in the public interest--nonsense, they are promoting junk science so they can promote regulations they want to see burden citizens, business and industry.

>

> I know the well credentialed and educated readers of this letter know the rules that they are violating by sponsoring and promoting these enviro scare studies about killer this or that, including the focus of this letter, CARB sponsored small particles studies used to justify CARB's aggressive recommendations on small particles regulations. How is it that the new small particle proposal and its supporting science would be shown to fail with a letter I wrote in 2011--well because the CARB and USC small particle fanatics haven't improved on their junk science methods and their treacherous perfidious policy advocacy?

>

> I would gladly show up for another debate to show that CARB produces the same junk research now as it did more than 10 years ago that I discussed in my letter of 2011 that details the same criticisms and exposes the same silliness of today. CARB and its paid "scientists" lost the old debate convincingly and the risible Jarrett study that followed on was an effort to rehabilitate but it came a cropper, another undisciplined effort to make small particles out to be a lethal threat to civilization and the human race.

>

> Political tyrants can't let a scare/crisis go to waste. The regs proposed now are just as misguided and inappropriate as the ones proposed in 2010. The new ones will pile on more negative economic impact and be evidence that CARB continues to be mendacious, malignant, misanthropic and destructive in its regulatory conduct and policies.

>

> I have no hope CARB and its scientists will withdraw from this latest regulatory move; however a new administration in Washington and a new EPA may be the therapy that people at USC and CARB need. I would skip a meal or two to help deliver that cure for CARB's addiction to junk science and misguided policies. The addressees on this email would be well advised to shut down the project to promote new more stringent and certainly unnecessary new regulations, retire to reconsider their scientific misconduct, however if they insist they should be required to engage a debate, not the usual sleep walking public comment event, and another debate will remove all doubt that that CARB sponsors and promotes junk science and bad policies and regulations because it is motivated by perverse environmentalist ideological agendas.

>

> Set a date for the debate and remove all doubt about CARB research's lack of scientific integrity. It won't take me but a few minutes to update my letter of 2011 since CARB still engages in the same small particle research scientific fraud. I may ask cement pumper/writer-columnist Hank de Carbonel to read my updated letter into the debate record so I don't have to endure the depressing experience of spending time in a failing state that once represented the American dream and success story. There was a time in my life that traveling to CA was a pleasure. No longer--CA is failing fast, thanks to the apparatchiks and nomenklatura in CA government and academia.

>

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Cordially,

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>

/JDunn MD/

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John Dale Dunn MD JD  
401 Rocky Hill Road  
Brownwood, Texas 76801  
(325) 784-6697

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2025-01-23 09:38:12

No Duplicates.

**Comment 2 for PM2.5 Area Designation Recommendations for the Revised Federal Annual PM2.5 Standard (pm2.5fed9ugstandard). (At Hearing)**

First Name: James

Last Name: Enstrom

Email Address: jenstrom@ucla.edu

Affiliation: Scientific Integrity Institute & UCLA

Subject: Enstrom Emails to Benjamin & Su re Invalid PM2.5 NAAQS 011325

Comment:

Attached January 13, 2025 PDF includes James E. Enstrom, PhD, emails to CARB AQ Planning Chief Michael Benjamin, DEnv, and UCB Researcher Jason Su, PhD, that provide Evidence that Invalidates the 2024 EPA 9  $\mu\text{g}/\text{m}^3$  PM2.5 NAAQS in California.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/6-pm2.5fed9ugstandard-VjNUPFwuVXIBdQBv.pdf>

Original File Name: Enstrom Emails to Benjamin & Su re PM2.5 NAAQS 011325.pdf

Date and Time Comment Was Submitted: 2025-01-23 09:55:46

No Duplicates.

**Comment 3 for PM2.5 Area Designation Recommendations for the Revised Federal Annual PM2.5 Standard (pm2.5fed9ugstandard). (At Hearing)**

First Name: James

Last Name: Enstrom

Email Address: jenstrom@ucla.edu

Affiliation: Scientific Integrity Institute & UCLA

Subject: Enstrom Email & Dunn Letter to Scheehle re Invalid PM2.5 011625

Comment:

Attached January 16, 2025 PDF includes Enstrom Email and Dunn Letter re scientifically and economically unjustified 9 µg/m<sup>3</sup> PM2.5 NAAQS to CARB Research Division Chief Elizabeth Scheehle (<https://www.linkedin.com/in/elizabethscheehle/>).

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/7-pm2.5fed9ugstandard-VTAGbgByACcDdwJt.pdf>

Original File Name: Enstrom Email & Dunn Letter to Scheehle re PM2.5 011625.pdf

Date and Time Comment Was Submitted: 2025-01-23 10:07:34

No Duplicates.

**Comment 4 for PM2.5 Area Designation Recommendations for the Revised Federal Annual PM2.5 Standard (pm2.5fed9ugstandard). (At Hearing)**

First Name: James

Last Name: Enstrom

Email Address: jenstrom@ucla.edu

Affiliation: Scientific Integrity Institute & UCLA

Subject: WSTA Letter to ACS Showing NO PM2.5 Deaths in CPS II 120624

Comment:

Attached is December 6, 2024 Western States Trucking Association Letter to the American Cancer Society Providing Strong Evidence that there are NO PM2.5 Deaths in the 1982 ACS Cancer Prevention Study (CPS II). This Evidence invalidates the 1997 PM2.5 NAAQS and the 2024 PM2.5 NAAQS, particularly for California.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/8-pm2.5fed9ugstandard-VCNdKAN2WGoAWVU5.pdf>

Original File Name: WSTA Letter to ACS re PM2.5 Deaths in CPS II 120624.pdf

Date and Time Comment Was Submitted: 2025-01-23 10:13:00

No Duplicates.

**Comment 5 for PM2.5 Area Designation Recommendations for the Revised Federal Annual PM2.5 Standard (pm2.5fed9ugstandard). (At Hearing)**

First Name: craig

Last Name: thomas

Email Address: craigthomas068@gmail.com

Affiliation:

Subject: Written Comment

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/9-pm2.5fed9ugstandard-UTJdKQZmVG4GZwF1.pdf>

Original File Name: craigthomas.pdf

Date and Time Comment Was Submitted: 2025-01-23 10:45:45

No Duplicates.

**Comment 6 for PM2.5 Area Designation Recommendations for the Revised Federal Annual PM2.5 Standard (pm2.5fed9ugstandard). (At Hearing)**

First Name: Christian  
Last Name: Bisher  
Email Address: christian.bisher@ccejn.org  
Affiliation: CCEJN

Subject: 25-1-4 PM2.5 Area Designations  
Comment:

Comment file attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/11-pm2.5fed9ugstandard-VTcBbgZ0BD9WNQh6.pdf>

Original File Name: Bisher Comments Jan 23, 2025 CARB Governing Board Meeting.pdf

Date and Time Comment Was Submitted: 2025-01-23 10:48:41

No Duplicates.