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Date: September 14, 2018 at 10:25:11 AM PDT
To: SJVAPCD Comment <airqualityplans@valleyair.org>
Cc: Samir Sheikh <Samir.Sheikh@valleyair.org>, Jaime Holt <Jaime.Holt@valleyair.org>, C. Arden Pope III <cap3@byu.edu>, Susan M. Gapstur <susan.gapstur@cancer.org>, Alpa V. Patel <alpa.patel@cancer.org>, W. Ryan Diver <ryan.diver@cancer.org>
Subject: Misrepresentations in SJVAPCD Draft 2018 Plan for PM2.5

September 14, 2018

Samir Sheikh <Samir.Sheikh@valleyair.org>
Jaime Holt <Jaime.Holt@valleyair.org>
San Joaquin Valley Air Pollution Control District Leadership

Re: Misrepresentations in SJVAPCD Draft 2018 Plan for PM2.5

Dear SJVAPCD Leadership,

I am writing to point out very inaccurate statements in the SJVAPCD *Draft 2018 Plan for 1997, 2006, and 2012 PM2.5 Standards* (<http://www.valleyair.org/pmplans/>). I am an accomplished epidemiologist and physicist with a long academic career at UCLA. Since 2005 have published peer-reviewed evidence that challenges the validity of the EPA PM2.5 NAAQS, which is the focus of the *Draft 2018 Plan*. I have shown that PM2.5 does not cause premature deaths in California or the San Joaquin Valley (SJV), contrary to the claims of CARB and an agricultural economist named Pope. In 2017 I published a major reanalysis that provides strong evidence that PM2.5 does not cause premature deaths in the US or California. I have identified serious errors in the 1995 *AJRCCM* article by Pope and the American Cancer Society that played a primary role in the establishment of the 1997 PM2.5 NAAQS ([https://yosemite.epa.gov/sab/sabproduct.nsf/D41456F68B9F91658525829D004DBD73/\\$File/88483770.pdf](https://yosemite.epa.gov/sab/sabproduct.nsf/D41456F68B9F91658525829D004DBD73/$File/88483770.pdf)). My evidence, along with much additional evidence from other accomplished experts, challenges the validity of and justification for compliance with the 1997, 2006, and 2012 PM2.5 NAAQS. Since 2008 I have presented much of this evidence to the CARB Chair and top CARB scientists like 'Dr.' Hien T. Tran. Unfortunately, CARB has ignored and suppressed my evidence and other similar evidence and has NEVER presented it to the SJVAPCD Board and Citizens Advisory Committee (CAC).

I cite two of the many inaccurate statements in the 1,342-page SJVAPCD *Draft 2018 Plan for the 1997, 2006, and 2012 PM2.5 Standards* (<http://www.valleyair.org/pmplans/documents/2018/pm-plan/2018-PM-25-Plan.pdf>). Section 3.2 Health Impacts of PM2.5 on page 51 inaccurately states: "Many studies have quantified and documented the health benefits of attaining the U.S. Environmental Protection Agency (EPA) air quality standards for PM." The Supplement to the State SIP Strategy on page 1290 inaccurately states: "The health and economic impacts of exposure to elevated levels of ozone and PM2.5 in California are considerable and meeting federal standards will pay substantial dividends in terms of reducing costs associated with emergency room visits and hospitalization for heart and lung related causes, lost work and school days and reducing incidences of asthma. Most critically, exposure to PM2.5 and ozone is also associated with increased risk of premature mortality, which has been estimated to contribute to 7,500 premature deaths each year in California." These statements are inaccurate and inappropriate because they DO NOT APPLY to the SJV, which has been known for 20 years to be at very low risk for PM2.5 health effects.

Some of my early findings documenting the healthiness of the SJV regarding PM2.5 are summarized in the November 16, 2009 "legitimacy of CARB" letter by former CARB and SJVAPCD Board Member John

G. Telles, MD, of Fresno (<http://www.scientificintegrityinstitute.org/Telles111609.pdf>) and the October 10, 2010 “investigate CARB for fraud” Bakersfield Californian column by Lois Henry (<http://scientificintegrityinstitute.org/Henry101010.pdf>). Air quality in the SJV, California, and the US is at healthy levels, as shown in EPA Maps of PM2.5 and Ozone in the US (<https://www.airnow.gov/>). Indeed, WHO World Maps (see below) show that unhealthy levels of PM2.5 are in China, India, Africa, and Europe, not in the US (<http://www.who.int/airpollution/data/en/>).

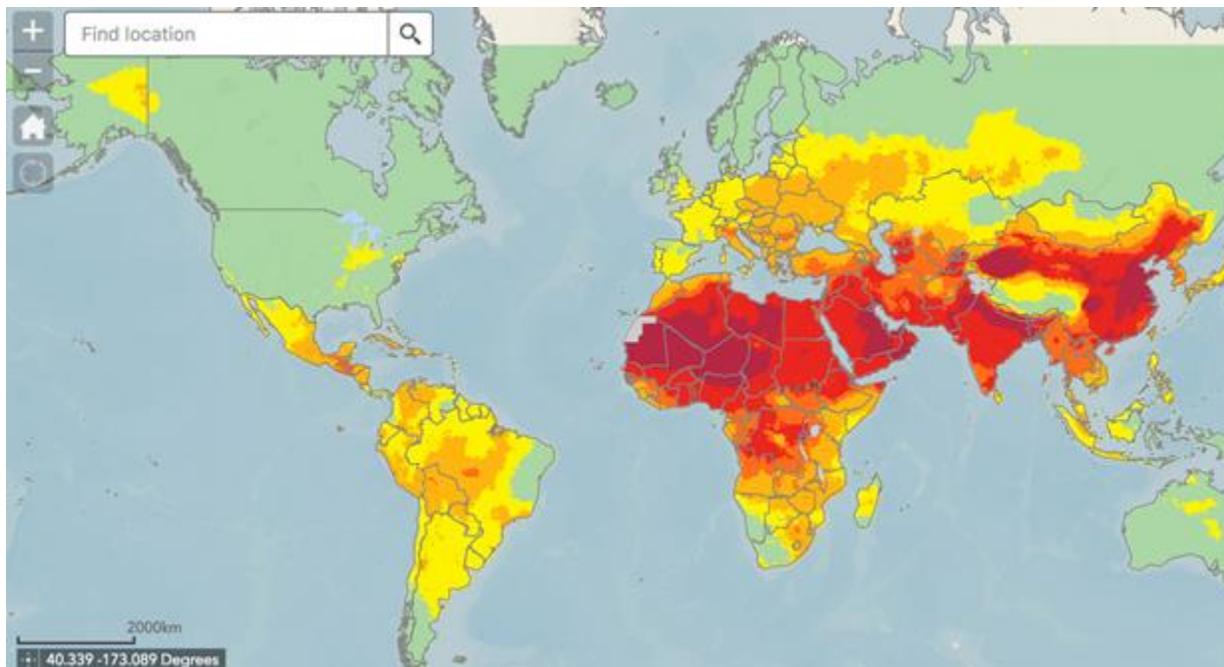
The next version of the *Draft Plan for PM2.5* must include the extensive evidence of the flaws in the PM2.5 NAAQS and must emphasize the healthiness of the SJV regarding PM2.5. The SJVAPCD Board and CAC must fully assess this evidence before any further PM2.5 regulations are considered or implemented in the SJV. I request that SJVAPCD Leadership invite me and other highly qualified experts to explain to the SJVAPCD Board and CAC all the flaws with the PM2.5 NAAQS, the *Draft 2018 Plan for PM2.5*, and CARB claims about PM2.5. Please respond promptly to my request. The SJV is too important to the economy of California and the US to continue to be adversely impacted by multi-billion-dollar PM2.5 regulations that are scientifically and economically unjustified.

Thank you very much for your consideration.

Sincerely yours,

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World Health Organization Map 2015 Annual Mean Ambient PM_{2.5} (µg/m³)



August 14, 2018

To:

Docket ID No. EPA-HQ-OA-2018-0259

“Strengthening Transparency in Regulatory Science”

<https://www.regulations.gov/document?D=EPA-HQ-OA-2018-0259-0001>

U.S. Environmental Protection Agency

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From:

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My public comments below strongly support the importance of the proposed EPA Rule “Strengthening Transparency in Regulatory Science.” My comments consist of my independent March 28, 2017 reanalysis of the 1982 ACS Cancer Prevention Study (CPS II) cohort, which found no robust relationship between fine particulate matter (PM_{2.5}) and total mortality. No errors have been identified in my reanalysis since its publication, as explained in my May 29, 2018 response to the December 13, 2017 criticism by Pope and ACS. Additional details are contained in my Spring 2018 article “Scientific Distortions in Fine Particulate Matter Epidemiology.” My comments identify serious problems in what EPA defines as “pivotal regulatory science”: the dose response data and models in the CPS II cohort that were largely responsible for the establishment of the 1997 EPA PM_{2.5} NAAQS. Finally, my comments are a highly relevant example of the importance of independent access to underlying data and transparency in regulatory science.

1) My March 28, 2017 *Dose-Response* article “Fine Particulate Matter and Total Mortality in Cancer Prevention Study Cohort Reanalysis”

(<http://journals.sagepub.com/doi/full/10.1177/1559325817693345>) found NO significant relationship between PM_{2.5} and total mortality during 1982-1988 in the ACS CPS II cohort, except for replication of the selective positive relationship published in the 1995 *AJRCCM* Pope article. My peer-reviewed results are based on my independent reanalysis of an original 1982-1988 version of the de-identified CPS II cohort data, as explained in my article.

2) My null relationship findings challenge the robustness and integrity of the positive relationship between PM2.5 and total mortality in the 1995 *AJRCCM* Pope article, the 2000 HEI Reanalysis Report, and the 2009 HEI Research Report 140. My findings were criticized in the December 13, 2017 *Dose-Response* Letter “Fine Particulate Air Pollution and Mortality: Response to Enstrom’s Reanalysis of the American Cancer Society Cancer Prevention Study II Cohort” by Pope, HEI Krewski, ACS Gapstur, and three HEI collaborators (<http://journals.sagepub.com/doi/full/10.1177/1559325817746303>). However, in the 17 months since publication of my article, Pope and ACS have failed to assess the validity of my null findings and have identified no errors. Even more troubling, they have shown no willingness to cooperate with me in addressing a matter that is very important to the integrity of both air pollution epidemiology and EPA regulatory policy.

3) My May 29, 2018 *Dose-Response* Letter “Response to Criticism of ‘Fine Particulate Matter and Total Mortality in Cancer Prevention Study Cohort Reanalysis’” (<http://journals.sagepub.com/doi/pdf/10.1177/1559325818769728>) addresses the Pope and ACS criticism of my March 28, 2017 Reanalysis, provides additional evidence of a null PM2.5-total mortality relationship, and includes detailed county-level CPS II data that does not violate subject confidentiality. The validity of my 2017 Reanalysis is further supported by my Spring 2018 *JAPS* article “Scientific Distortions in Fine Particulate Matter Epidemiology” (<http://www.jpands.org/vol23no1/enstrom.pdf>). It is extremely important that all four items included below be examined in great detail, including text, tables, figures, and references. These items clearly demonstrate the value of independent reanalysis and transparency in air pollution epidemiology and regulatory science.

4) Since my repeated requests to Pope, ACS, HEI, and other CPS II investigators have been rejected, EPA formally should ask ACS to cooperate with transparent analyses of the CPS II data, such as, the analyses that I have conducted and requested. If ACS fully cooperates with EPA, then it might be useful to modify the EPA Transparency Rule to include a full cooperation option that does not require releasing actual data. If ACS fails to cooperate with EPA and other legitimate investigators like myself, then their CPS II research results should not be used for EPA regulations. I am certainly willing to cooperate with EPA on analyses using the 1982-1988 CPS II cohort data that I possess.

Fine Particulate Matter and Total Mortality in Cancer Prevention Study Cohort Reanalysis

Dose-Response:
An International Journal
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James E. Enstrom¹

Abstract

Background: In 1997 the US Environmental Protection Agency (EPA) established the National Ambient Air Quality Standard (NAAQS) for fine particulate matter (PM_{2.5}), largely because of its positive relationship to total mortality in the 1982 American Cancer Society Cancer Prevention Study (CPS II) cohort. Subsequently, EPA has used this relationship as the primary justification for many costly regulations, most recently the Clean Power Plan. An independent analysis of the CPS II data was conducted in order to test the validity of this relationship.

Methods: The original CPS II questionnaire data, including 1982 to 1988 mortality follow-up, were analyzed using Cox proportional hazards regression. Results were obtained for 292 277 participants in 85 counties with 1979-1983 EPA Inhalable Particulate Network PM_{2.5} measurements, as well as for 212 370 participants in the 50 counties used in the original 1995 analysis.

Results: The 1982 to 1988 relative risk (RR) of death from all causes and 95% confidence interval adjusted for age, sex, race, education, and smoking status was 1.023 (0.997-1.049) for a 10 µg/m³ increase in PM_{2.5} in 85 counties and 1.025 (0.990-1.061) in the 50 original counties. The fully adjusted RR was null in the western and eastern portions of the United States, including in areas with somewhat higher PM_{2.5} levels, particularly 5 Ohio Valley states and California.

Conclusion: No significant relationship between PM_{2.5} and total mortality in the CPS II cohort was found when the best available PM_{2.5} data were used. The original 1995 analysis found a positive relationship by selective use of CPS II and PM_{2.5} data. This independent analysis of underlying data raises serious doubts about the CPS II epidemiologic evidence supporting the PM_{2.5} NAAQS. These findings provide strong justification for further independent analysis of the CPS II data.

Keywords

epidemiology, PM_{2.5}, deaths, CPS II, reanalysis

Introduction

In 1997 the US Environmental Protection Agency (EPA) established the National Ambient Air Quality Standard (NAAQS) for fine particulate matter (PM_{2.5}), largely because of its positive relationship to total mortality in the 1982 American Cancer Society (ACS) Cancer Prevention Study (CPS II) cohort, as published in 1995 by Pope et al.¹ The EPA uses this positive relationship to claim that PM_{2.5} causes premature deaths. However, the validity of this finding was immediately challenged with detailed and well-reasoned criticism.²⁻⁴ The relationship still remains contested and much of the original criticism has never been properly addressed, particularly the need for truly independent analysis of the CPS II data.

The EPA claim that PM_{2.5} causes premature deaths is implausible because no etiologic mechanism has ever been established and because it involves the lifetime inhalation of

only about 5 g of particles that are less than 2.5 µm in diameter.⁵ The PM_{2.5} mortality relationship has been further challenged because the small increased risk could be due to well-known epidemiological biases, such as, the ecological fallacy, inaccurate exposure measurements, and confounding variables like copollutants. In addition, there is extensive evidence of spatial and temporal variation in PM_{2.5} mortality risk (MR) that does not support 1 national standard for PM_{2.5}.

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In spite of these serious problems, EPA and the major PM_{2.5} investigators continue to assert that their positive findings are sufficient proof that PM_{2.5} causes premature deaths. Their premature death claim has been used to justify many costly EPA regulations, most recently, the Clean Power Plan.⁶ Indeed, 85% of the total estimated benefits of all EPA regulations have been attributed to reductions in PM_{2.5}-related premature deaths. With the assumed benefits of PM_{2.5} reductions playing such a major role in EPA regulatory policy, it is essential that the relationship of PM_{2.5} to mortality be independently verified with transparent data and reproducible findings.

In 1998, the Health Effects Institute (HEI) in Boston was commissioned to conduct a detailed reanalysis of the original Pope 1995 findings. The July 2000 HEI Reanalysis Report (HEI 2000) included "PART I: REPLICATION AND VALIDATION" and "PART II: SENSITIVITY ANALYSES."⁷ The HEI Reanalysis Team lead by Daniel Krewski successfully replicated and validated the 1995 CPS II findings, but they did not analyze the CPS II data in ways that would determine whether the original results remained robust using different sources of air pollution data. For instance, none of their models used the best available PM_{2.5} measurements as of 1995.

Particularly troubling is the fact that EPA and the major PM_{2.5} investigators have ignored multiple null findings on the relationship between PM_{2.5} and mortality in California. These null findings include my 2005 paper,⁸ 2006 clarification,⁹ 2012 American Statistical Society Joint Statistical Meeting Proceedings paper,¹⁰ and 2015 International Conference on Climate Change presentation about the Clean Power Plan and PM_{2.5}-related cobenefits.⁶ There is now overwhelming evidence of a null PM_{2.5} mortality relationship in California dating back to 2000. The problems with the PM_{2.5} mortality relationship have generated substantial scientific and political concern.

During 2011 to 2013, the US House Science, Space, and Technology Committee (HSSTC) repeatedly requested that EPA provide access to the underlying CPS II data, particularly since substantial Federal funding has been used for CPS II PM_{2.5} mortality research and publications. On July 22, 2013, the HSSTC made a particularly detailed request to EPA that included 49 pages of letters dating back to September 22, 2011.¹¹ When EPA failed to provide the requested data, the HSSTC issued an August 1, 2013 subpoena to EPA for the CPS II data.¹² The ACS refused to comply with the HSSTC subpoena, as explained in an August 19, 2013 letter to EPA by Chief Medical Officer Otis W. Brawley.¹³ Then, following the subpoena, ACS has refused to work with me and 3 other highly qualified investigators regarding collaborative analysis of the CPS II data.¹⁴ Finally, HEI has refused to conduct my proposed CPS II analyses.¹⁵ However, my recent acquisition of an original version of the CPS II data has made possible this first truly independent analysis.

Methods

Computer files containing the original 1982 ACS CPS II deidentified questionnaire data and 6-year follow-up data on deaths from September 1, 1982 through August 31, 1988, along

with detailed documentation, were obtained from a source with appropriate access to these data, as explained in the "Acknowledgments." This article presents my initial analysis of the CPS II cohort and it is subject to the limitations of data and documentation that is not as complete and current as the data and documentation possessed by ACS.

The research described below is exempt from human participants or ethics approval because it involved only statistical analysis of existing deidentified data. Human participants' approval was obtained by ACS in 1982 when each individual enrolled in CPS II. Because of the epidemiologic importance of this analysis, an effort will be made to post on my Scientific Integrity Institute website a version of the CPS II data that fully preserves the confidentiality of all of participants and that contains enough information to verify my findings.

Of the 1.2 million total CPS II participants, analysis has been done on 297 592 participants residing in 85 counties in the continental United States with 1979 to 1983 EPA Inhalable Particulate Network (IPN) PM_{2.5} measurements.^{16,17} Among these participants, there were 18 612 total deaths from September 1, 1982 through August 31, 1988; 17 329 of these deaths (93.1%) had a known date of death. Of the 297 592 participants, 292 277 had age at entry of 30 to 99 years and sex of male [1] or female [2]. Of the 292 277 participants, 269 766 had race of white [1,2,5] or black [3,4]; education level of no or some high school [1,2], high school graduate [3], some college [4,5], college graduate [6], or graduate school [7]; and smoking status of never [1], former [5-8 for males and 3 for females], or current [2-4 for males and 2 for females]. Those participants reported to be dead [D, G, K] but without an exact date of death have been assumed to be alive in this analysis. The unconfirmed deaths were randomly distributed and did not impact relative comparisons of death in a systematic way. The computer codes for the above variables are shown in brackets.

CPS II participants were entered into the master data file geographically. Since this deidentified data file does not contain home addresses, the Division number and Unit number assigned by ACS to each CPS II participant have been used to define their county of residence. For instance, ACS Division 39 represents the state of Ohio and its Unit 041 represents Jefferson County, which includes the city of Steubenville, where the IPN PM_{2.5} measurements were made. In other words, most of the 575 participants in Unit 041 lived in Jefferson County as of September 1, 1982. The IPN PM_{2.5} value of 29.6739 µg/m³, based on measurements made in Steubenville, was assigned to all CPS II participants in Unit 041. This PM_{2.5} value is a weighted average of 53 measurements (mean of 33.9260 µg/m³) and 31 measurements (mean of 29.4884 µg/m³) made during 1979 to 1982¹⁶ and 53 measurements (mean of 27.2473 µg/m³) and 54 measurements (mean of 28.0676 µg/m³) made during 1983.¹⁷ The IPN PM_{2.5} data were collected only during 1979 to 1983, although some other IPN air pollution data were collected through 1984. The values for each county that includes a city with CPS II participants and IPN PM_{2.5} measurements are shown in Appendix Table A1.

Table 1. Summary Characteristics of CPS II Participants in (1) Pope 1995 Table 1,¹ (2) HEI 2000 Table 24,⁷ and (3) Current Analysis Based on CPS II Participants in 50 and 85 Counties.

Characteristics	Pope 1995 Table 1	HEI 2000 Table 24	Current CPS II Analysis		
			n = 50 HEI PM _{2.5}	n = 50 IPN PM _{2.5}	n = 85 IPN PM _{2.5}
Number of metro areas	50	50			
Number of counties	Not stated	Not stated	50	50	85
Age–sex-adjusted participants			212 370	212 370	292 277
Fully adjusted participants	295 223	298 817	195 215	195 215	269 766
Age–sex-adjusted deaths			12 518	12 518	17 231
Fully adjusted deaths	20 765	23 093	11 221	11 221	15 593
Values below are for participants in fully adjusted results					
Age at enrollment, mean years	56.6	56.6	56.66	56.66	56.64
Sex (% females)	55.9	56.4	56.72	56.72	56.61
Race (% white)	94.0	94.0	94.58	94.58	95.09
Less than high school education, %	11.3	11.3	11.71	11.71	11.71
Never smoked regularly, %			41.69	41.69	41.57
Former smoker, %			33.25	33.25	33.67
Former cigarette smoker, %	29.4	30.2	30.43	30.43	30.81
Current smoker, %			25.06	25.06	24.76
Current cigarette smoker, %	21.6	21.4	21.01	21.01	20.76
Fine particles, µg/m ³					
Average	18.2	18.2	17.99	21.37	21.16
SD	5.1	4.4	4.52	5.30	5.98
Range	9.0-33.5	9.0-33.4	9.0-33.4	10.77-29.67	10.63-42.01

Abbreviations: CPS, Cancer Prevention Study; HEI, Health Effects Institute; IPN, Inhalable Particulate Network; PM_{2.5}, fine particulate matter.

To make the best possible comparison with Pope 1995 and HEI 2000 results, the HEI PM_{2.5} value of 23.1 µg/m³ for Steubenville was assigned to all participants in Unit 041. This value is the median of PM_{2.5} measurements made in Steubenville and is shown in HEI 2000 Appendix D “Alternative Air Pollution Data in the ACS Study.”⁷ Analyses were done for the 50 counties containing the original 50 cities with CPS II participants and HEI PM_{2.5} values used in Pope 1995 and HEI 2000. Additional analyses were done for all 85 counties containing cities with both CPS II participants and IPN PM_{2.5} data. Without explanation, Pope 1995 and HEI 2000 omitted from their analyses, 35 cities with CPS II participants and IPN PM_{2.5} data. To be clear, these analyses are based on the CPS II participants assigned to each Unit (county) that included a city with IPN PM_{2.5} data. The original Pope 1995 and HEI 2000 analyses were based on the CPS II participants assigned to each metropolitan area (MA) that included a city with HEI PM_{2.5} data, as defined in HEI 2000 Appendix F “Definition of Metropolitan Areas in the ACS Study.”⁷ The MA, which was equivalent to the US Census Bureau Standard Metropolitan Statistical Area (SMSA), always included the county containing the city with the HEI PM_{2.5} data and often included 1 or more additional counties.

The SAS 9.4 procedure PHREG was used to conduct Cox proportional hazards regression.¹⁸ Relative risks (RRs) for death from all causes and 95% confidence intervals (CI) were calculated using age–sex adjustment and full adjustment (age, sex, race, education, and smoking status, as defined above). Each of the 5 adjustment variables had a strong relationship to total mortality. Race, education, and smoking status were the

3 adjustment variables that had the greatest impact on the age–sex-adjusted RR. The Pope 1995 and HEI 2000 analyses used 4 additional adjustment variables that had a lesser impact on the age–sex-adjusted RR.

In addition, county-level ecological analyses were done by comparing IPN PM_{2.5} and HEI PM_{2.5} values to 1980 age-adjusted white total death rates (DRs) determined by the Centers for Disease Control and Prevention (CDC) WONDER¹⁹ and mortality risks (MRs) as shown in Figures 5 and 21 of HEI 2000.⁷ Death rates are age adjusted to the 2000 US Standard Population and are expressed as annual deaths per 100 000 persons. The SAS 9.4 procedure REGRESSION was used to conduct linear regression of PM_{2.5} values with DRs and MRs.

Appendix Table A1 lists the 50 original cities used in Pope 1995 and HEI 2000 and includes city, county, state, ACS Division and Unit numbers, Federal Information Processing Standards (FIPS) code, IPN average PM_{2.5} level, HEI median PM_{2.5} level, 1980 DR, and HEI MR. Appendix Table A1 also lists similar information for the 35 additional cities with CPS II participants and IPN PM_{2.5} data. However, HEI PM_{2.5} and HEI MR data are not available for these 35 cities.

Results

Table 1 shows basic demographic characteristics for the CPS II participants, as stated in Pope 1995,¹ HEI 2000,⁷ and this current analysis. There is excellent agreement on age, sex, race, education, and smoking status. However, the IPN PM_{2.5} averages are generally about 20% higher than the HEI PM_{2.5} medians, although the differences range from +78% to –28%.

Table 2. Age–Sex-Adjusted and Fully Adjusted Relative Risk of Death From All Causes (RR and 95% CI) From September 1, 1982 Through August 31, 1988 Associated With Change of 10 $\mu\text{g}/\text{m}^3$ Increase in $\text{PM}_{2.5}$ for CPS II Participants Residing in 50 and 85 Counties in the Continental United States With 1979 to 1983 IPN $\text{PM}_{2.5}$ Measurements.^a

$\text{PM}_{2.5}$ Years and Source	Number of Counties	Number of Participants	Number of Deaths	RR	95% CI Lower Upper	Average $\text{PM}_{2.5}$
Age–sex adjusted RR for the continental United States						
1979-1983 IPN	85	292 277	17 321	1.038	(1.014-1.063)	21.16
1979-1983 IPN	50	212 370	12 518	1.046	(1.013-1.081)	21.36
1979-1983 HEI	50	212 370	12 518	1.121	(1.078-1.166)	17.99
Fully adjusted RR for the continental United States						
1979-1983 IPN	85	269 766	15 593	1.023	(0.997-1.049)	21.15
1979-1983 IPN	50	195 215	11 221	1.025	(0.990-1.061)	21.36
1979-1983 HEI	50	195 215	11 221	1.082	(1.039-1.128)	17.99
Age–sex adjusted RR for Ohio Valley States (IN, KY, OH, PA, WV)						
1979-1983 IPN	17	56 979	3649	1.126	(1.011-1.255)	25.51
1979-1983 IPN	12	45 303	2942	1.079	(0.951-1.225)	25.76
1979-1983 HEI	12	45 303	2942	1.153	(1.027-1.296)	22.02
Fully adjusted RR for Ohio Valley states (IN, KY, OH, PA, WV)						
1979-1983 IPN	17	53 026	3293	1.096	(0.978-1.228)	25.51
1979-1983 IPN	12	42 174	2652	1.050	(0.918-1.201)	25.75
1979-1983 HEI	12	42 174	2652	1.111	(0.983-1.256)	22.02
Age–sex adjusted RR for states other than the Ohio Valley states						
1979-1983 IPN	68	235 298	13 672	0.999	(0.973-1.027)	20.11
1979-1983 IPN	38	167 067	9576	0.983	(0.946-1.021)	20.18
1979-1983 HEI	38	167 067	9576	1.045	(0.997-1.096)	16.90
Fully adjusted RR for states other than the Ohio Valley states						
1979-1983 IPN	68	216 740	12 300	0.994	(0.967-1.023)	20.09
1979-1983 IPN	38	153 041	8569	0.975	(0.936-1.015)	20.15
1979-1983 HEI	38	153 041	8569	1.025	(0.975-1.078)	16.89

Abbreviations: CI, confidence interval; CPS, Cancer Prevention Study; HEI, Health Effects Institute; IPN, Inhalable Particulate Network; $\text{PM}_{2.5}$, particulate matter.
^aAnalysis includes continental United States, 5 Ohio Valley states, and remainder of the states. Appendix Table A1 lists the 85 cities and counties with $\text{PM}_{2.5}$ measurements.

Table 2 shows that during 1982 to 1988, there was no significant relationship between IPN $\text{PM}_{2.5}$ and total mortality in the entire United States. The fully adjusted RR and 95% CI was 1.023 (0.997-1.049) for a 10 $\mu\text{g}/\text{m}^3$ increase in $\text{PM}_{2.5}$ in all 85 counties and 1.025 (0.990-1.061) in the 50 original counties. Indeed, the fully adjusted RR was not significant in any area of the United States, such as, the states west of the Mississippi River, the states east of the Mississippi River, the 5 Ohio Valley states (Indiana, Kentucky, Ohio, Pennsylvania, and West Virginia), and the states other than the Ohio Valley states. The age–sex-adjusted and fully adjusted RRs in the states other than the Ohio Valley states are all consistent with no relationship and most are very close to 1.00. The slightly positive age–sex-adjusted RRs for the entire United States and the Ohio Valley states became statistically consistent with no relationship after controlling for the 3 confounding variables of race, education, and smoking status.

However, the fully adjusted RR for the entire United States was 1.082 (1.039-1.128) when based on the HEI $\text{PM}_{2.5}$ values in 50 counties. This RR agrees quite well with the fully adjusted RR of 1.067 (1.037-1.099) for 1982 to 1989, which is shown in Table 34 of the June 2009 HEI Extended Follow-up Research Report (HEI 2009).²⁰ Thus, the positive nationwide RRs in the CPS II cohort depend upon the use of HEI $\text{PM}_{2.5}$ values. The nationwide RRs are consistent with no effect when based on IPN $\text{PM}_{2.5}$ values. The findings in Table 2 clearly demonstrate the large influence of $\text{PM}_{2.5}$ values and geography on the RRs.

Table 3 shows that the fully adjusted RR in California was 0.992 (0.954-1.032) when based on IPN $\text{PM}_{2.5}$ values in all 11 California counties. This null finding is consistent with the 15 other findings of a null relationship in California, all of which are shown in Appendix Table B1. However, when the RR is based on the 4 California counties used in Pope 1995 and HEI 2000, there is a significant inverse relationship. The fully adjusted RR is 0.879 (0.805-0.960) when based on the IPN $\text{PM}_{2.5}$ values and is 0.870 (0.788-0.960) when based on the HEI $\text{PM}_{2.5}$ values. This significant inverse relationship is in exact agreement with the finding of a special analysis of the CPS II cohort done for HEI by Krewski in 2010, which yielded a fully adjusted RR of 0.872 (0.805-0.944) during 1982 to 1989 in California when based on HEI $\text{PM}_{2.5}$ values.²¹ In this instance, the California RRs are clearly dependent upon the number of counties used.

Table 4 shows that the ecological analysis based on linear regression is quite consistent with the proportional hazard regression results in Tables 2 and 3, in spite of the fact that the regression results are not fully adjusted. Using 1980 age-adjusted white total DRs versus HEI $\text{PM}_{2.5}$ values in 50 counties, linear regression yielded a regression coefficient of 6.96 (standard error [SE] = 1.85) that was statistically significant at the 95% confidence level. Pope 1995 reported a significant regression coefficient for 50 cities of 8.0 (SE = 1.4). However, this positive coefficient is

Table 3. Age–Sex-Adjusted and Fully Adjusted Relative Risk of Death From All Causes (RR and 95% CI) From September 1, 1982 Through August 31, 1988 Associated With 10 µg/m³ Increase in PM_{2.5} for California CPS II Participants Living in 4 and 11 Counties With 1979 to 1983 IPN PM_{2.5} Measurements.^a

PM _{2.5} Years and Source	Number of Counties	Number of Participants	Number of Deaths	RR	95% CI of RR		Average PM _{2.5}
					Lower	Upper	
Age–sex adjusted RR for California during 1982 to 1988							
1979-1983 IPN	11	66 615	3856	1.005	(0.968-1.043)		24.08
1979-1983 IPN	4	40 527	2146	0.904	(0.831-0.983)		24.90
1979-1983 HEI	4	40 527	2146	0.894	(0.817-0.986)		18.83
Fully adjusted (age, sex, race, education, and smoking status) RR for California during 1982 to 1988							
1979-1983 IPN	11	60 521	3512	0.992	(0.954-1.032)		24.11
1979-1983 IPN	4	36 201	1939	0.879	(0.805-0.960)		25.01
1979-1983 HEI	4	36 201	1939	0.870	(0.788-0.960)		18.91
Fully adjusted (44 confounders) RR for California during 1982 to 1989 as per Krewski ²¹							
“Same” Standard Cox Model 1979-1983 HEI	4	40 408		0.872	(0.805-0.944)		~ 19
“Different” Standard Cox Model 1979-1983 HEI	4	38 925		0.893	(0.823-0.969)		~ 19

Abbreviations: CI, confidence interval; CPS, Cancer Prevention Study; HEI, Health Effects Institute; IPN, Inhalable Particulate Network; PM_{2.5}, particulate matter.
^aAlso, fully adjusted RR for California participants in 4 counties from September 1, 1982 through December 31, 1989 as calculated by Krewski.²¹

Table 4. Linear Regression Results for 1979 to 1983 IPN PM_{2.5} and 1979 to 1983 HEI PM_{2.5} Versus 1980 Age-Adjusted White Total Death Rate (DR) for 85 Counties With IPN PM_{2.5} Data and for 50 HEI 2000 Counties With IPN PM_{2.5} and HEI PM_{2.5} data.

DR or MR, PM _{2.5} Years and Source	Number of Counties	DR or MR Intercept	DR or MR Slope	95% CI of DR or MR Slope		P Value
				Lower	Upper	
Entire continental United States						
DR and 1979-1983 IPN	85	892.68	6.8331	3.8483	9.8180	0.0000
DR and 1979-1983 HEI	50	910.92	6.9557	3.2452	10.6662	0.0004
MR and 1979-1983 IPN	50	0.6821	0.0102	0.0044	0.0160	0.0009
MR and 1979-1983 HEI	50	0.6754	0.0121	0.0068	0.0173	0.0000
Ohio Valley states (IN, KY, OH, PA, and WV)						
DR and 1979-1983 IPN	17	941.77	6.0705	−0.0730	12.2139	0.0524
DR and 1979-1983 HEI	12	1067.29	1.3235	−7.3460	9.9930	0.7408
MR and 1979-1983 IPN	12	0.8153	0.0077	−0.0054	0.0208	0.2202
MR and 1979-1983 HEI	12	0.9628	0.0020	−0.0080	0.0121	0.6608
States other than the Ohio Valley states						
DR and 1979-1983 IPN	68	921.45	4.8639	0.9093	8.8186	0.0167
DR and 1979-1983 HEI	38	934.66	4.8940	−0.4337	10.2218	0.0706
MR and 1979-1983 IPN	38	0.8111	0.0020	−0.0054	0.0094	0.5891
MR and 1979-1983 HEI	38	0.7334	0.0072	0.0000	0.0144	0.0491
States west of the Mississippi river						
DR and 1979-1983 IPN	36	920.10	4.0155	−0.9396	8.9706	0.1088
DR and 1979-1983 HEI	22	930.11	4.1726	−5.2015	13.5468	0.3642
MR and 1979-1983 IPN	22	0.8663	−0.0025	−0.0162	0.0112	0.7067
MR and 1979-1983 HEI	22	0.6413	0.0134	−0.0018	0.0285	0.0807
California						
DR and 1979-1983 IPN	11	921.71	3.6516	−1.8230	9.1262	0.1656
DR and 1979-1983 HEI	4	992.50	1.9664	−46.6929	50.6256	0.8780
MR and 1979-1983 IPN	4	0.9529	−0.0074	−0.0600	0.0453	0.6072
MR and 1979-1983 HEI	4	0.8336	−0.0021	−0.0618	0.0576	0.8935

Abbreviations: CI, confidence interval; HEI, Health Effects Institute; IPN, Inhalable Particulate Network; MR, mortality risk; PM_{2.5}, particulate matter.

^aLinear regression results are also shown for 1979 to 1983 IPN PM_{2.5} and 1979 to 1983 HEI PM_{2.5} versus MR for the 50 “cities” (metropolitan areas) in figures 5 and 21 in HEI 2000.

misleading because both DRs and PM_{2.5} levels are higher in the East than in the West. Regional regression analyses did not generally yield significant regression coefficients. Specifically, there were no significant regression coefficients

for California, the 5 Ohio Valley states, or all states west of the Mississippi River. These findings reinforce the CPS II cohort evidence of statistically insignificant PM_{2.5} MR throughout the United States.

Conclusion

This independent analysis of the CPS II cohort found that there was no significant relationship between $PM_{2.5}$ and death from all causes during 1982 to 1988, when the best available $PM_{2.5}$ measurements were used for the 50 original counties and for all 85 counties with $PM_{2.5}$ data and CPS II participants. However, a positive relationship was found when the HEI $PM_{2.5}$ measurements were used for the 50 original counties, consistent with the findings in Pope 1995 and HEI 2000. This null and positive evidence demonstrates that the $PM_{2.5}$ mortality relationship is not robust and is quite sensitive to the $PM_{2.5}$ data and CPS II participants used in the analysis.

Furthermore, the following statement on page 80 of HEI 2000 raises serious doubts about the quality of the air pollution data used in Pope 1995 and HEI 2000: "AUDIT OF AIR QUALITY DATA. The ACS study was not originally designed as an air pollution study. The air quality monitoring data used for the ACS analyses came from various sources, some of which are now technologically difficult to access. Documentation of the statistical reduction procedures has been lost. Summary statistics for different groups of standard metropolitan statistical areas had been derived by different investigators. These data sources do not indicate whether the tabulated values refer to all or a subset of monitors in a region or whether they represent means or medians."⁷

The Pope 1995 and HEI 2000 analyses were based on 50 median $PM_{2.5}$ values shown in Appendix A of the 1988 Brookhaven National Laboratory Report 52122 by Lipfert et al.²² These analyses did not use or cite the high quality and widely known EPA IPN $PM_{2.5}$ data in spite of the fact that these data have been available in 2 detailed EPA reports since 1986.^{16,17} Lipfert informed HEI about the IPN data in 1998: "During the early stages of the Reanalysis Project, I notified HEI and the reanalysis contractors of the availability of an updated version of the IPN data from EPA, which they apparently obtained. This version includes more locations and a slightly longer period of time. It does not appear that the newer IPN data are listed in Appendix G, and it is thus not possible to confirm if SMSA assignments were made properly."²³

Thus, the HEI Reanalysis Team failed to properly "evaluate the sensitivity of the original findings to the indicators of exposure to fine particle air pollution used by the Original Investigators" and failed to select "all participants who lived within each MA for which data on sulfate or fine particle pollution were available."⁷ Furthermore, HEI 2009 did not use these data even though the investigators were aware of my 2005 null $PM_{2.5}$ mortality findings in California,⁸ which were based on the IPN data for 11 California counties, instead of the 4 California counties used in Pope 1995 and HEI 2000. Indeed, HEI 2009 did not cite my 2005 findings, in spite of my personal discussion of these findings with Pope, Jerrett, and Burnett on July 11, 2008.²⁴ Finally,

HEI 2009 did not acknowledge or address my 2006 concerns about the geographic variation in $PM_{2.5}$ MR clearly shown in HEI 2000 Figure 21,⁷ which is included here as Appendix Figure C1. HEI 2009 entirely avoided the issue of geographic variation in $PM_{2.5}$ MR and omitted the equivalent to HEI 2000 Figure 21.

Since 2002, HEI has repeatedly refused to provide the city-specific $PM_{2.5}$ -related MR for the 50 cities included in HEI 2000 Figure 21.¹⁵ I estimated these MRs in 2010 based on visual measurements of HEI 2000 Figure 5, and my estimates are shown in Appendix Table A1.²⁵ Figure 21 and its MRs represented early evidence that there was no $PM_{2.5}$ -related MR in California. Appendix Table B1 shows the now overwhelming 2000 to 2016 evidence from 6 different cohorts that there is no relationship between $PM_{2.5}$ and total mortality in California. Indeed, the weighted average RR of the latest results from the 6 California cohorts is $RR = 0.999$ (0.988-1.010).²⁶

The authors of the CPS II $PM_{2.5}$ mortality publications, which began with Pope 1995, have faced original criticism,²⁻⁴ my criticism,^{6-10,14,15} and the criticism of the HSSTC and its subpoena.¹¹⁻¹³ Now, my null findings represent a direct challenge to the positive findings of Pope 1995. All of this criticism is relevant to the EPA claim that $PM_{2.5}$ has a *causal* relationship to total mortality. The authors of Pope 1995, HEI 2000, and HEI 2009 need to promptly address my findings, as well as the earlier criticism. Then, they need to cooperate with critics on transparent air pollution epidemiology analyses of the CPS II cohort data.

Also, major scientific journals like the *New England Journal of Medicine (NEJM)* and *Science*, which have consistently written about the positive relationship between $PM_{2.5}$ and total mortality, need to publish evidence of no relationship when strong null evidence is submitted to them. In 2015, *Science* immediately rejected without peer reviewing 3 versions of strong evidence that $PM_{2.5}$ does not *cause* premature deaths.⁵ In 2016, *Science* immediately rejected without peer reviewing this article. Indeed, this article was rejected by *NEJM*, *Science*, and 5 other major journals, as described in a detailed compilation of relevant correspondence.²⁷ Most troubling is the rejection by the *American Journal of Respiratory and Clinical Care Medicine*, which has published Pope 1995 and several other $PM_{2.5}$ mortality articles based on the CPS II cohort data.

In summary, the null CPS II $PM_{2.5}$ mortality findings in this article directly challenge the original positive Pope 1995 findings, and they raise serious doubts about the CPS II epidemiologic evidence supporting the $PM_{2.5}$ NAAQS. These findings demonstrate the importance of independent and transparent analysis of underlying data. Finally, these findings provide strong justification for further independent analysis of CPS II cohort data.

Appendix A

Table A1. List of the 85 Counties Containing the 50 Cities Used in Pope 1995, HEI 2000, and This Analysis, as well as the 35 Additional Cities Used Only in This Analysis.^a

State	ACS Div-Unit	FIPS Code	IPN/HEI County Containing IPN/HEI City	IPN/HEI City With PM _{2.5} Measurements	1979-1983 IPN PM _{2.5} , µg/m ³ , (Weighted Average)	1979-1983 HEI PM _{2.5} , µg/m ³ (Median)	1980 Age-Adj White Death Rate (DR)	HEI Figure 5 Mortality Risk (MR)
AL	01037	01073	Jefferson	Birmingham	25.6016	24.5	1025.3	0.760
AL	01049	01097	Mobile	Mobile	22.0296	20.9	1067.2	0.950
AZ	03700	04013	Maricopa	Phoenix	15.7790	15.2	953.0	0.855
AR	04071	05119	Pulaski	Little Rock	20.5773	17.8	1059.4	0.870
CA	06001	06001	Alameda	Livermore	14.3882		1016.6	
CA	06002	06007	Butte	Chico	15.4525		962.5	
CA	06003	06013	Contra Costa	Richmond	13.9197		937.1	
CA	06004	06019	Fresno	Fresno	18.3731	10.3	1001.4	0.680
CA	06008	06029	Kern	Bakersfield	30.8628		1119.3	
CA	06051	06037	Los Angeles	Los Angeles	28.2239	21.8	1035.1	0.760
CA	06019	06065	Riverside	Rubidoux	42.0117		1013.9	
CA	06020	06073	San Diego	San Diego	18.9189		943.7	
CA	06021	06075	San Francisco	San Francisco	16.3522	12.2	1123.1	0.890
CA	06025	06083	Santa Barbara	Lompoc	10.6277		892.8	
CA	06026	06085	Santa Clara	San Jose	17.7884	12.4	921.9	0.885
CO	07004	08031	Denver	Denver	10.7675	16.1	967.3	0.925
CO	07047	08069	Larimer	Fort Collins	11.1226		810.5	
CO	07008	08101	Pueblo	Pueblo	10.9155		1024.1	
CT	08001	09003	Hartford	Hartford	18.3949	14.8	952.0	0.845
CT	08004	09005	Litchfield	Litchfield	11.6502		941.5	
DE	09002	10001	Kent	Dover	19.5280		959.4	
DE	09004	10003	New Castle	Wilmington	20.3743		1053.7	
DC	10001	11001	Dist Columbia	Washington	25.9289	22.5	993.2	0.850
FL	11044	12057	Hillsborough	Tampa	13.7337	11.4	1021.8	0.845
GA	12027	13051	Chatham	Savannah	17.8127		1029.6	
GA	12062	13121	Fulton	Atlanta	22.5688	20.3	1063.5	0.840
ID	13001	16001	ADA	Boise	18.0052	12.1	892.6	0.600
IL	14089	17031	Cook	Chicago	25.1019	21.0	1076.3	0.945
IL	14098	17197	Will	Braidwood	17.1851		1054.0	
IN	15045	18089	Lake	Gary	27.4759	25.2	1129.8	0.995
IN	15049	18097	Marion	Indianapolis	23.0925	21.1	1041.2	0.970
KS	17287	20173	Sedgwick	Wichita	15.0222	13.6	953.4	0.890
KS	17289	20177	Shawnee	Topeka	11.7518	10.3	933.7	0.830
KY	18010	21019	Boyd	Ashland	37.7700		1184.6	
KY	18055	21111	Jefferson	Louisville	24.2134		1095.7	
MD	21106	24510	Baltimore City	Baltimore	21.6922		1237.8	
MD	21101	24031	Montgomery	Rockville	20.2009		881.9	
MA	22105	25013	Hampden	Springfield	17.5682		1025.3	
MA	22136	25027	Worcester	Worcester	16.2641		1014.6	
MN	25001	27053	Hennepin	Minneapolis	15.5172	13.7	905.3	0.815
MN	25150	27123	Ramsey	St. Paul	15.5823		935.7	
MS	26086	28049	Hinds	Jackson	18.1339	15.7	1087.4	0.930
MO	27001	29095	Jackson	Kansas City	17.8488		1090.3	
MT	28009	30063	Missoula	Missoula	17.6212		938.0	
MT	28011	30093	Silver Bow	Butte	16.0405		1299.5	
NE	30028	31055	Douglas	Omaha	15.2760	13.1	991.0	0.880
NV	31101	32031	Washoe	Reno	13.1184	11.8	1049.5	0.670
NJ	33004	34007	Camden	Camden	20.9523		1146.9	
NJ	33007	34013	Essex	Livingston	16.4775		1072.7	
NJ	33009	34017	Hudson	Jersey City	19.9121	17.3	1172.6	0.810
NM	34201	35001	Bernalillo	Albuquerque	12.8865	9.0	1014.7	0.710
NY	36014	36029	Erie	Buffalo	25.1623	23.5	1085.6	0.960
NY	35001	36061	New York	New York City	23.9064		1090.4	
NC	37033	37063	Durham	Durham	19.4092	16.8	1039.2	1.000

(continued)

Table A1. (continued)

State	ACS Div-Unit	FIPS Code	IPN/HEI County Containing IPN/HEI City	IPN/HEI City With PM _{2.5} Measurements	1979-1983 IPN PM _{2.5} , µg/m ³ , (Weighted Average)	1979-1983 HEI PM _{2.5} , µg/m ³ (Median)	1980 Age-Adj White Death Rate (DR)	HEI Figure 5 Mortality Risk (MR)
NC	37064	37119	Mecklenburg	Charlotte	24.1214	22.6	932.8	0.835
OH	39009	39017	Butler	Middletown	25.1789		1108.3	
OH	39018	39035	Cuyahoga	Cleveland	28.4120	24.6	1089.1	0.980
OH	39031	39061	Hamilton	Cincinnati	24.9979	23.1	1095.2	0.980
OH	39041	39081	Jefferson	Steubenville	29.6739	23.1	1058.6	1.145
OH	39050	39099	Mahoning	Youngstown	22.9404	20.2	1058.4	1.060
OH	39057	39113	Montgomery	Dayton	20.8120	18.8	1039.5	0.980
OH	39077	39153	Summit	Akron	25.9864	24.6	1064.0	1.060
OK	40055	40109	Oklahoma	Oklahoma City	14.9767	15.9	1050.4	0.985
OR	41019	41039	Lane	Eugene	17.1653		885.5	
OR	41026	41051	Multnomah	Portland	16.3537	14.7	1060.8	0.830
PA	42101	42003	Allegheny	Pittsburgh	29.1043	17.9	1115.6	1.005
PA	42443	42095	Northampton	Bethlehem	19.5265		998.6	
PA	43002	42101	Philadelphia	Philadelphia	24.0704	21.4	1211.0	0.910
RI	45001	44007	Providence	Providence	14.2341	12.9	1006.1	0.890
SC	46016	45019	Charleston	Charleston	16.1635		1023.5	
TN	51019	47037	Davidson	Nashville	21.8944	20.5	981.9	0.845
TN	51088	47065	Hamilton	Chattanooga	18.2433	16.6	1087.9	0.840
TX	52811	48113	Dallas	Dallas	18.7594	16.5	1024.9	0.850
TX	52859	48141	El Paso	El Paso	16.9021	15.7	903.5	0.910
TX	52882	48201	Harris	Houston	18.0421	13.4	1025.7	0.700
UT	53024	49035	Salt Lake	Salt Lake City	16.6590	15.4	954.3	1.025
VA	55024	51059	Fairfax	Fairfax	19.5425		925.7	
VA	55002	51710	Norfolk City	Norfolk	19.5500	16.9	1139.3	0.910
WA	56017	53033	King	Seattle	14.9121	11.9	943.6	0.780
WA	56032	53063	Spokane	Spokane	13.5200	9.4	959.2	0.810
WV	58130	54029	Hancock	Weirton	25.9181		1094.8	
WV	58207	54039	Kanawha	Charleston	21.9511	20.1	1149.5	1.005
WV	58117	54069	Ohio	Wheeling	23.9840	33.4	1117.5	1.020
WI	59005	55009	Brown	Green Bay	20.5462		931.0	
WI	59052	55105	Rock	Beloit	19.8584		1019.4	

^aEach location includes State, ACS Division Unit number, Federal Information Processing Standards (FIPS) code, IPN/HEI county, IPN/HEI city with PM_{2.5} measurements, 1979-1983 IPN average PM_{2.5} level, 1979-1983 HEI median PM_{2.5} level, 1980 age-adjusted white county total death rate (annual deaths per 100 000), and HEI 2000 figure 5 mortality risk for HEI city (metropolitan area). List also includes 35 additional counties containing cities with IPN PM_{2.5} data used in this analysis. These 35 counties do not have HEI PM_{2.5} data.

Appendix B

Table B1. Epidemiologic Cohort Studies of PM_{2.5} and Total Mortality in California, 2000 to 2016: Relative Risk of Death From All Causes (RR and 95% CI) Associated With Increase of 10 µg/m³ in PM_{2.5} (<http://scientificintegrityinstitute.org/NoPMDeaths081516.pdf>).

Krewski 2000 and 2010 ^{a,b}	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 PM _{2.5} ; 44 covariates)				
McDonnell 2000 ^c	CA AHSMOG Cohort	N ~ 3800	RR ~ 1.00 (0.95-1.05)	1977-1992
(N ~ [1347 M + 2422 F]; SC&SD&SF AB; M RR = 1.09 (0.98-1.21) & F RR ~ 0.98 (0.92-1.03))				
Jerrett 2005 ^d	CPS II Cohort in LA Basin	N = 22 905	RR = 1.11 (0.99-1.25)	1982-2000
(N = 22 905 M and F; 267 zip code areas; 1999-2000 PM _{2.5} ; 44 cov + max confounders)				
Enstrom 2005 ^e	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 PM _{2.5})				
Enstrom 2006 ^f	CA CPS I Cohort	N = 35 783	RR = 1.061 (1.017-1.106)	1973-1982
(N = [15 573 M + 20 210 F]; 11 counties; 1979-1983 and 1999-2001 PM _{2.5})				
Zeger 2008 ^g	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 PM _{2.5})				

(continued)

Table B1. (continued)

Jerrett 2010 ^b (N = [34 367 M + 43 400 F]; 54 counties; 2000 PM _{2.5} ; KRG ZIP; 20 ind cov + 7 eco var; slide 12)	CA CPS II Cohort	N = 77 767	RR ~ 0.994 (0.965-1.025)	1982-2000
Krewski 2010 ^b (2009) (4 MSAs; 1979-1983 PM _{2.5} ; 44 cov) (7 MSAs; 1999-2000 PM _{2.5} ; 44 cov)	CA CPS II Cohort	N = 40 408 N = 50 930	RR = 0.960 (0.920-1.002) RR = 0.968 (0.916-1.022)	1982-2000 1982-2000
Jerrett 2011 ⁱ (N = [32 509 M + 41 100 F]; 54 counties; 2000 PM _{2.5} ; KRG ZIP Model; 20 ind cov + 7 eco var; Table 28)	CA CPS II Cohort	N = 73 609	RR = 0.994 (0.965-1.024)	1982-2000
Jerrett 2011 ⁱ (N = [32 509 M + 41 100 F]; 54 counties; 2000 PM _{2.5} ; Nine Model Ave; 20 ic + 7 ev; Figure 22 and Tables 27-32)	CA CPS II Cohort	N = 73 609	RR = 1.002 (0.992-1.012)	1982-2000
Lipsett 2011 ^j (N = [73 489 F]; 2000-2005 PM _{2.5})	CA Teachers Cohort	N = 73 489	RR = 1.01 (0.95-1.09)	2000-2005
Ostro 2011 ^k (N = [43 220 F]; 2002-2007 PM _{2.5})	CA Teachers Cohort	N = 43 220	RR = 1.06 (0.96-1.16)	2002-2007
Jerrett 2013 ^l (N = [~32 550 M + ~41 161 F]; 54 counties; 2000 PM _{2.5} ; LUR Conurb Model; 42 ind cov + 7 eco var + 5 metro; Table 6)	CA CPS II Cohort	N = 73 711	RR = 1.060 (1.003-1.120)	1982-2000
Jerrett 2013 ^l (Same parameters and model as above, except including co-pollutants NO ₂ and Ozone; Table 5)	CA CPS II Cohort	N = 73 711	RR = 1.028 (0.957-1.104)	1982-2000
Ostro 2015 ^m (N = [101 881 F]; 2002-2007 PM _{2.5}) (all natural causes of death)	CA Teachers Cohort	N = 101 884	RR = 1.01 (0.98-1.05)	2001-2007
Thurston 2016 ⁿ (N = [~95 965 M + ~64 245 F]; full baseline model: PM _{2.5} by zip code; Table 3) (all natural causes of death)	CA NIH-AARP Cohort	N = 160 209	RR = 1.02 (0.99-1.04)	2000-2009
Enstrom 2016 unpublished (N = [~96 059 M + ~64 309 F]; full baseline model: 2000 PM _{2.5} by county)	CA NIH-AARP Cohort	N = 160 368	RR = 1.001 (0.949-1.055)	2000-2009

^aKrewski D. "Reanalysis of the Harvard Six Cities Study and the American Cancer Society Study of Particulate Air Pollution and Mortality: HEI Special Report. July 2000". 2000. Figure 5 and Figure 21 of Part II: Sensitivity Analyses <http://www.scientificintegrityinstitute.org/HEIFigure5093010.pdf>.

^bKrewski D. August 31, 2010 letter from Krewski to Health Effects Institute and CARB with California-specific PM_{2.5} mortality results from Table 34 in Krewski 2009. 2010. http://www.arb.ca.gov/research/health/pm-mort/HEI_Correspondence.pdf

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Appendix C

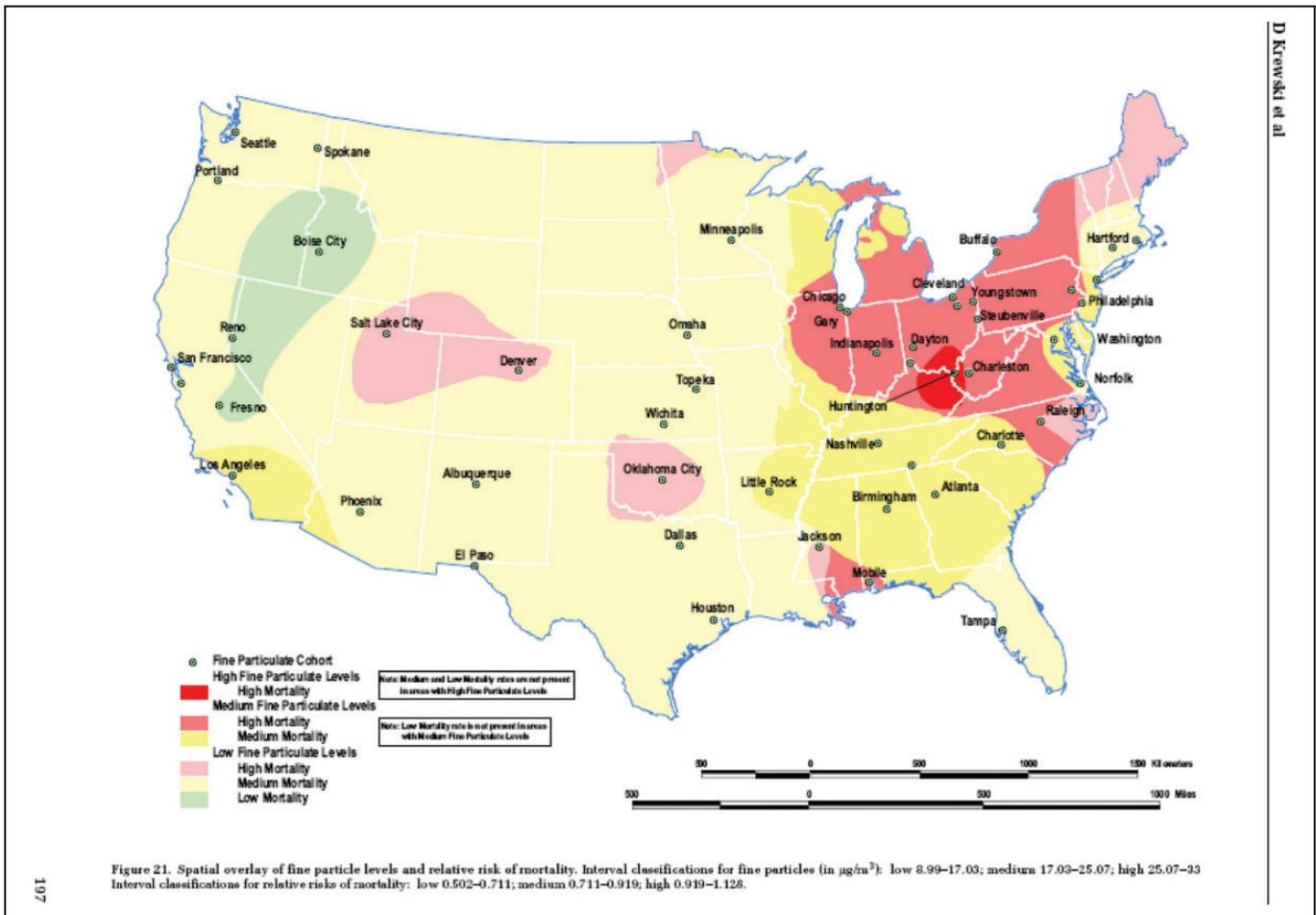


Figure C1. 1982 to 1989 $\text{PM}_{2.5}$ mortality risk (MR) in 50 cities (metropolitan areas) shown in Figure 21 on page 197 of HEI 2000^{7,9} and listed in Appendix Table B1. Figure 21. Spatial overlay of fine particle levels and relative risk of mortality. Interval classifications for fine particles (in g/m^3): low 8.99 to 17.03; medium 17.03 to 25.07; high 25.07 to 33. Interval classifications for relative risks of mortality: low 0.052 to 0.711; medium 0.711 to 0.919; high 0.919 to 1.128.

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Supplemental Material

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Fine Particulate Air Pollution and Mortality: Response to Enstrom's Reanalysis of the American Cancer Society Cancer Prevention Study II Cohort

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Background

The first analysis of long-term exposures to air pollution and risk of mortality using the American Cancer Society Cancer Prevention Study II (ACS CPS-II) cohort was published in 1995.¹ Subsequently, extensive independent reanalysis² and multiple extended analyses³⁻⁷ were conducted. These studies have consistently demonstrated that exposure to fine particulate matter air pollution (PM_{2.5}) is associated with increased risk of mortality, especially cardiopulmonary or cardiovascular disease mortality. A recent analysis by Enstrom, based on early data from the ACS CPS-II cohort, reports no significant relationship between PM_{2.5} and total mortality.⁸ The author asserts that the original analyses, reanalyses, and the extended analyses found positive PM_{2.5}-mortality relationships because of selective use of CPS-II and PM_{2.5} data.

Expanded Analyses of the ACS CPS-II Cohort

The assertion regarding selective use of the CPS-II and PM_{2.5} data is false. The scope of analyses of the ACS CPS-II cohort conducted over more than 2 decades were explicitly expanded over time to characterize population health risks of PM_{2.5} in more detail and with greater accuracy. Table 1 provides an outline of key published studies of this expansive body of air pollution research. The highlights of the obvious progress made during the course of these studies include the following:

- 1) increased mortality follow-up from 7 to 22 or 26 years;
- 2) increased number of participants included in the analyses from approximately 295 000 to 670 000;
- 3) increased number of deaths (a key determinant of study power) included in the analyses from approximately 21 000 to 237 000;

- 4) improved assessment of PM_{2.5} exposures (and exposures of co-pollutants) from metro-level averages for cities with air pollution monitoring to modeled PM_{2.5} exposures at geocoded residential addresses throughout the United States; and
- 5) improved statistical models, including improved control for individual and ecological covariates, and better representation of spatial patterns in the data.

As shown in Figure 1, estimates of the percentage increase in mortality risk per 10 µg/m³ increase in PM_{2.5} for all-cause and for cardiovascular disease mortality from studies using the ACS CPS-II cohort have been remarkably consistent across the expanded analyses over the last 20+ years. The recent analysis by Enstrom⁸ shows an estimated PM_{2.5}-mortality association that is smaller than observed in the original analysis, the

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Table 1. Overview of Key Studies of Particulate Matter Air Pollution and Risk of Mortality Using the ACS CPS-II Cohort.

Citation	Authors	Approx. No. Participants (Deaths) for Key PM Measures	Geographic Units of Exposure	Years of Follow-Up	Comments
<i>Am J Respir Crit Care Med.</i> 1995;151:669-674. ¹	Pope et al	PM _{2.5} : 295 000 (21 000) SO ₄ : 550 000 (39 000)	50 metro areas 151 metro areas in the United States	7 (1982-1989)	Original analysis: Mortality, especially cardiopulmonary, associated with PM _{2.5} and SO ₄
Health Effects Institute 2000; HEI Special Report. ²	Krewski et al	PM _{2.5} : 300 000 (23 000) SO ₄ : 559 000 (43 000)	50 metro areas 151 metro areas in the United States	7 (1982-1989)	Independent reanalysis that substantively reproduced original results, developed improved modeling, and provided substantial sensitivity analysis
<i>JAMA.</i> 2002;287:1132-1141. ³	Pope et al	PM _{2.5} : 500 000 SO ₄ : 560 000	116 metro areas 149 metro areas in the United States	16 (1982-1998)	All-cause, lung-cancer, and cardiopulmonary mortality, associated with PM _{2.5} and SO ₄ . Improved statistical modeling, including random effects
<i>Circulation.</i> 2004;109:71-77. ⁹	Pope et al	PM _{2.5} : 500 000	116 metro areas in the United States	16 (1982-1998)	PM _{2.5} associated with cardiovascular mortality. Evidence of pathophysiological pathways of disease explored
<i>Epidemiology.</i> 2005;16:727-736. ¹⁰	Jerrett et al	PM _{2.5} : 23 000 (6000)	267 zip code areas in metro Los Angeles	18 (1982-2000)	Relatively large PM _{2.5} associations with all-cause, lung-cancer, and cardiopulmonary mortality
<i>Lancet.</i> 2009;374:2091-2103. ¹¹	Smith et al	PM _{2.5} , SO ₄ , and elemental carbon: 350 000 (93 000)	86 metro areas in the United States	18 (1982-2000)	Cardiopulmonary mortality was associated with PM _{2.5} , SO ₄ , and elemental carbon. Correlations across pollutants make independent estimates difficult
Health Effects Institute 2009; Research Report Number 140. ⁴	Krewski et al	PM _{2.5} : 500 000 SO ₄ : 560 000	116 metro areas 147 metro areas in the United States	18 (1982-2000)	All-cause, lung-cancer, and cardiopulmonary mortality associated with PM _{2.5} and SO ₄ even controlling for ecologic covariates
<i>N Engl J Med.</i> 2009;360:1085-1095. ⁵	Jerrett et al	PM _{2.5} : 450 000 (118 000)	86 metro areas in the United States	18 (1982-2000)	Evaluated associations with ozone, independent of PM _{2.5} ; however, PM _{2.5} -mortality associations were observed as in previous studies
<i>Am J Respir Crit Care Med.</i> 2011;184:1374-1381. ¹²	Turner et al	PM _{2.5} : 178 000 never smokers (1000 lung cancer deaths)	117 metro areas in the United States	26 (1982-2008)	Long-term exposure to PM _{2.5} pollution was associated with small but significant increase in risk of lung cancer mortality
<i>Am J Respir Crit Care Med.</i> 2013;188:593-599. ¹³	Jerrett et al	PM _{2.5} : 74 000 (20 000)	Modeled exposures at geocoded home addresses throughout California	18 (1982-2000)	Based on individualized exposure assignments at home addresses, mortality risk was associated with air pollution, including PM _{2.5}
<i>Am J Epidemiol.</i> 2014;180:1145-1149. ¹⁴	Turner et al	PM _{2.5} : 430 000	Modeled PM _{2.5} exposures at geocoded home addresses throughout the United States	6 (1982-1988)	Evaluated the interactions between cigarette smoking and PM _{2.5} exposures for lung cancer mortality
<i>Circulation Res.</i> 2015;116:108-115. ⁶	Pope et al	PM _{2.5} : 670 000 (237 000)	Modeled PM _{2.5} exposures at geocoded home addresses throughout the United States	22 (1982-2004)	The associations between all-cause and cardiovascular mortality and PM _{2.5} were similar to previous studies but, given the very large cohort and large number of deaths, the statistical precision of the estimate was remarkable
<i>Environ Health Perspect.</i> 2016;124:785-794. ¹⁵	Thurston et al	PM _{2.5} : 446 000	100 metro areas in the United States	22 (1982-2004)	Evaluated source-related components of PM _{2.5} . Exposures from fossil fuel combustion, especially coal burning and traffic were associated with increased ischemic heart disease mortality
<i>Am J Respir Crit Care Med.</i> 2016;193:1134-1142. ¹⁶	Turner et al	PM _{2.5} : 670 000 (237 000)	Modeled PM _{2.5} exposures at geocoded home addresses throughout the United States	22 (1982-2004)	The focus of this study was on ozone exposure but mortality was associated with PM _{2.5} (both near-source and regional) as observed previously
<i>Environ Res.</i> 2017;154:304-310. ¹⁷	Turner et al	PM _{2.5} : 429 000 (146 000) Current or never smokers	Modeled PM _{2.5} exposures at geocoded home addresses throughout the United States	22 (1982-2004)	Evaluated interactions between cigarette smoking and PM _{2.5} . PM _{2.5} was associated with all-cause and cardiovascular mortality in both smokers and never smokers with evidence for a small additive interaction
<i>Environ Health Perspect.</i> 2017;125:552-559. ⁷	Jerrett et al	PM _{2.5} : 670 000 (237 000)	Modeled PM _{2.5} exposures at geocoded home addresses throughout the United States	22 (1982-2004)	PM _{2.5} exposures assigned to using 7 exposure models and 11 exposure estimates. PM _{2.5} -mortality risks were observed using all of the exposure models. Smaller associations observed using remote sensing exposure estimates; larger effects observed using exposure models that included ground-based information
<i>Dose-Response.</i> 2017;15(1):1-12. ⁸	Enstrom	PM _{2.5} : 270 000 (16 000)	85 counties in the United States	6 (1982-1988)	Asserted no significant mortality associations using "best" PM _{2.5} data

Abbreviations: ACS CPS II, American Cancer Society Cancer Prevention Study II; PM_{2.5}, particulate matter air pollution.

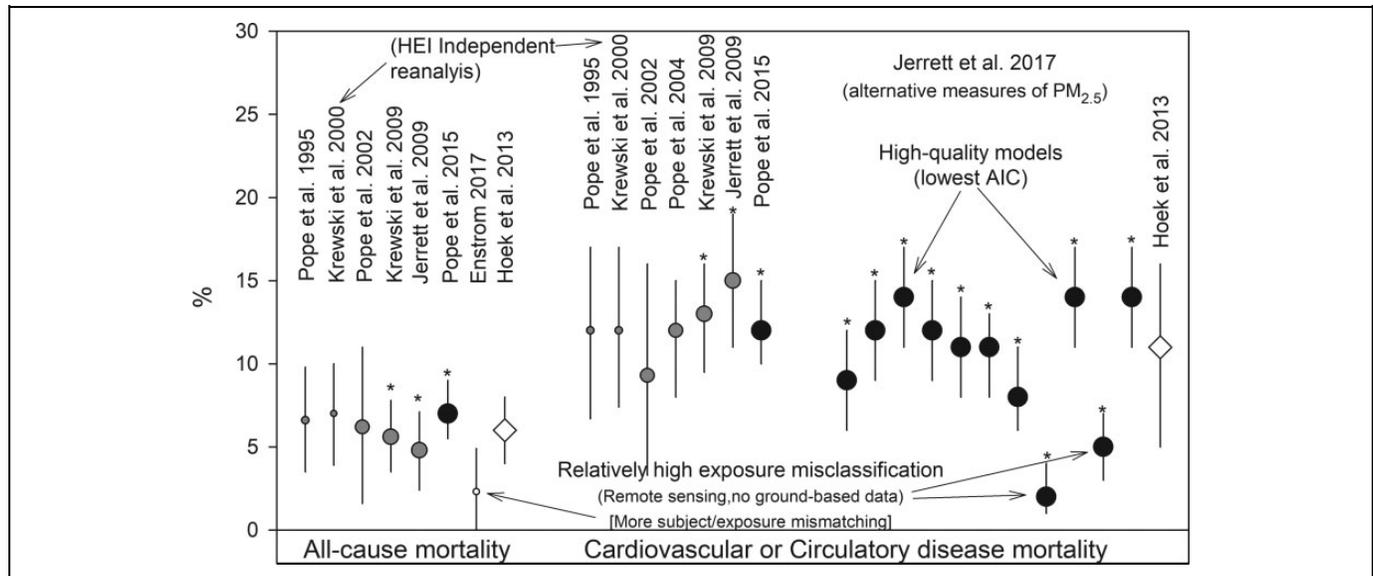


Figure 1. Nationwide estimates of percentage increase in mortality risk per $10 \mu\text{g}/\text{m}^3$ increase in $\text{PM}_{2.5}$ from various published studies using the ACS CPS-II cohort (indicated by circles) with comparison estimates from meta-analysis of the literature (indicated by diamonds). The size of the circles is relative to the length of the follow-up period. Gray and white circles indicate metro-level and county-level geographic units of exposure, respectively. Black circles indicate that exposures were modeled at geocoded residential addresses. Asterisks indicate that, in addition to controlling for individual covariate, the models also controlled for ecological covariates. Note. (1) Krewski et al.² report the results of an independent, confirmatory reanalysis of the ACS cohort organized by the Health Effects Institute. (2) In the investigation of alternative measures of $\text{PM}_{2.5}$ conducted by Jerrett et al.,⁷ the highest quality models (those with the lowest AIC) produced the highest risk estimates; remote sensing models with no ground-based data produced the lowest risk estimates, likely because of greater exposure misclassification. (3) The lowest risk estimate reported by Enstrom⁸ is based on a dated and short follow-up of the ACS cohort and is likely subject to exposure mismatching. ACS CPS II indicates American Cancer Society Cancer Prevention Study II; $\text{PM}_{2.5}$, particulate matter air pollution.

reanalysis, multiple subsequent extended analyses, or meta-analyses of studies throughout the world.¹⁸

Deficiencies in Enstrom's Reanalysis

Enstrom's recently published analysis⁸ is the least advanced analysis of the ACS CPS-II cohort to date (see Table 1). The Enstrom's analysis uses a data set with a shorter follow-up period, fewer participants, and fewer deaths than any previous $\text{PM}_{2.5}$ -mortality analyses that used the CPS-II cohort, including the original 1995 analysis. He controls for a relatively limited number of individual-level covariates and does not control for any ecologic covariates. Moreover, the key deficiency in the Enstrom's reanalysis is the absence of advanced modeling approaches for exposure assessment that have been developed over the last 2 decades. Estimates of $\text{PM}_{2.5}$ -mortality associations are affected by the quality of the $\text{PM}_{2.5}$ data and the accuracy of matching participants and exposures. In a recent analysis,⁷ we evaluated $\text{PM}_{2.5}$ exposures using multiple exposure assessment methods. Figure 1 illustrates that there were significant $\text{PM}_{2.5}$ -mortality risk associations for all $\text{PM}_{2.5}$ measures, but the associations were lower for the presumably less accurate measures that used remote sensing without ground-based data. Based on measures of model quality, the $\text{PM}_{2.5}$ exposure values that best fit (lowest Akaike Information Criteria, AIC) the data resulted in relatively larger $\text{PM}_{2.5}$ -mortality associations (see Figure 1). In contrast,

Enstrom⁸ asserts that he estimates smaller $\text{PM}_{2.5}$ -mortality associations because he uses the "best" $\text{PM}_{2.5}$ data. He provides neither evidence in support of this assertion nor any measures of the relative quality of models using alternative $\text{PM}_{2.5}$ data. It is not clear how or why his "IPN" $\text{PM}_{2.5}$ data differ from the "Health Effects Institute" $\text{PM}_{2.5}$ data—especially given that these data come from the same monitoring network.

Furthermore, Enstrom's $\text{PM}_{2.5}$ exposure assessment is likely subject to greater exposure misclassification because of inadequate assignment of geographic units of exposure. Although other published ACS CPS-II studies assigned geographic areas of exposure based on participants' residence information, the Enstrom's analysis used the ACS Division and Unit numbers to assign $\text{PM}_{2.5}$ exposures (see letter from ACS). The ACS Division and Unit numbers, however, were for the ACS volunteers that recruited the participants. These volunteers did not always live in the same area or even in the same state as the participants. Enstrom does not document the extent of this participant-exposure mismatching, but it has the potential for substantial exposure misclassification and resultant attenuation bias. Our published research using the ACS CPS-II data is based on participant-exposure matching that is accurate, includes highly spatially resolved exposure models, and utilizes ground-based monitoring and land use data.

An inexplicable deficiency of the Enstrom's article is its inadequate documentation of the relevant and extensive peer-reviewed literature. References provided in the article largely

include an unconventional mix of unpublished and non-peer-reviewed correspondence (including letters, e-mails, and transcript of a teleconference call), presentation slides, press releases, and a compilation of manuscript rejections. Key published extended analyses of the ACS CPS-II cohort,^{3,5,6,7,9-17} studies of other cohorts,¹⁸⁻³¹ or even major reviews and evaluations of the literature^{32,33} are not cited or discussed.

Broader Evidence

The PM_{2.5}-mortality associations observed from the various analyses of the ACS CPS-II cohort are consistent with a much broader body of evidence from other studies. As examples, these include studies of other cohorts from the United States¹⁹⁻²⁶ Europe,²⁷⁻²⁹ and Canada.^{30,31} In addition, meta-analytic estimates of the PM_{2.5}-mortality associations based on a 2013 meta-analysis of the overall literature¹⁸ are also provided for comparison purposes in Figure 1.

Previous studies of the ACS CPS-II cohort consistently demonstrated PM_{2.5}-mortality associations with cardiovascular mortality.^{7,9} There has also been substantial work in exploring and understanding the biological pathways and mechanisms linking PM_{2.5} exposures and cardiovascular disease and death.³²⁻³⁵ Similarly, the ACS CPS-II cohort has demonstrated PM_{2.5}-mortality associations with lung cancer mortality,^{3,12,14} and recently, the International Agency for Research on Cancer concluded, based on multiple sources of evidence, that particulate matter in outdoor air pollution is a cause of human lung cancer (group 1).³⁶ Enstrom⁸ presents no results for cardiovascular or lung cancer mortality and largely dismisses the substantial and growing literature regarding relevant pathophysiological pathways and related biological mechanisms.

The Global Burden of Diseases, Injuries, and Risk Factors Study 2015 (conducted by the Institute for Health Metrics and Evaluation) identified ambient PM_{2.5} air pollution as the 5th leading risk factor for global mortality, contributing to approximately 4.2 million deaths in 2015.^{37,38} These results are based on recent and comprehensive estimates from ACS CPS-II cohort studies and 23 other peer-reviewed studies of long-term exposure to PM_{2.5} and mortality from cause-specific cardiovascular and respiratory disease and lung cancer. These results underscore the importance of PM_{2.5} as a substantial determinant of mortality in the general population. Consequently, these results also suggest substantial health benefits from further reductions in ambient air pollution.

In summary, we welcome thoughtful criticism of our research. But the study by Enstrom does not contribute to the larger body of evidence on the health effects of PM_{2.5}, as it does not utilize adequate approaches for exposure assessment, suitable methods for linking participants to exposure, and sufficient statistical control for potential confounding factors and fails to recognize the larger body of evidence on PM_{2.5} exposure and disease risk.

Declaration of Conflicting Interests

The author(s) provided the following declaration of interests with respect to the research, authorship, and/or publication of this article:

Daniel Krewski reports to serving as Chief Risk Scientist and CEO at Risk Sciences International (<http://www.risksciences.com>), a Canadian company established in 2006 in partnership with the University of Ottawa conducting work in air quality risk assessment for both public and private sector clients. He also holds an Industrial Research Chair in Risk Science under a peer-reviewed university-industry partnership program administered by the Natural Sciences and Engineering Research Council of Canada, which involves methodological research in air pollution risk assessment. He also recently served as Chair of the US Health Effects Institute Diesel Epidemiology Panel, which conducted an evaluation of recent epidemiological evidence on quantitative risk assessment of diesel emissions and lung cancer. Michelle C. Turner reports personal fees from ICF Incorporated, LLC, outside this work.

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Response to Criticism of “Fine Particulate Matter and Total Mortality in Cancer Prevention Study Cohort Reanalysis”

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James E. Enstrom¹

Keywords

epidemiology, PM2.5, deaths, CPS II, reanalysis

Response to Criticism by CPS II Investigators

Drs C. Arden Pope III (Pope), Daniel Krewski (Krewski), Susan M. Gapstur (Gapstur), Michelle C. Turner (Turner), Michael Jerrett (Jerrett), and Richard T. Burnett (Burnett),¹ as well as Gapstur and Otis W. Brawley (Brawley)² strongly criticized my *Dose-Response* article, Enstrom,³ but they did not identify a single error, particularly regarding my findings of no relationship between fine particulate matter (PM2.5) and total (all-cause) mortality. Thus, my peer-reviewed findings showing no PM2.5-related deaths during 1982 to 1988 in the 1982 American Cancer Society (ACS) Cancer Prevention Study (CPS II) cohort stand unchallenged. In particular, my null findings indicate that the positive findings in 3 seminal publications by these investigators: Pope⁴ and Health Effects Institute, HEI (2000)⁵ and HEI (2009),⁶ are not robust and not supportive of the claim that PM2.5 causes premature deaths. Instead of assessing the validity of my findings, these investigators focused on other aspects of their many analyses of CPS II data.

Their “Expanded Analyses of the ACS CPS-II Cohort” section inaccurately questions the validity of my findings: “The assertion regarding selective use of the CPS-II and PM2.5 data is false.” I published *prima facie* evidence that their 1982 to 1989 PM2.5 mortality findings were indeed sensitive to selective use of PM2.5 and CPS II data. My evidence can be easily checked with minor modifications to the SAS programs that they used to calculate the findings in Table 34 of HEI (2009).⁶ Instead of confirming or refuting my evidence, these investigators reiterated their various published analyses of PM2.5 deaths in CPS II, as summarized in their Table 1 and their Figure 1. All of their analyses could be just as sensitive to selective use of PM2.5 and CPS II data as the results in Pope,⁴ HEI (2000),⁵ and HEI (2009).⁶

Their “Deficiencies in Enstrom’s Reanalysis” section does not identify a single error in my findings and suggests that they did not examine the data and findings in my article. For instance, they state, “In contrast, Enstrom⁸ asserts that he

estimates smaller PM2.5-mortality associations because he uses the ‘best’ PM2.5 data. He provides no evidence in support of this assertion nor does he provide any measures of the relative quality of models using alternative PM2.5 data.” Strong evidence supporting my assertion is clearly presented in Tables 2 and 3 of my article and is described in the “Results” section on page 4. Then, they state, “It is not clear how or why his ‘IPN’ PM2.5 data differ from the ‘HEI’ PM2.5 data—especially given that these data come from the same monitoring network.” The differences between the Inhalable Particulate Network (IPN) PM2.5 and HEI PM2.5 data are clearly shown in my Appendix Table A1 and discussed in the “Conclusion” section on page 6. To make sure that these differences are fully recognized and understood, an expanded version of Appendix Table A1 is shown in Table 1.

Their “Broader Evidence” section is not relevant to the validity of my findings and diverts attention away from my challenge to the PM2.5 death findings in Pope,⁴ HEI (2000),⁵ and HEI (2009).⁶ Their last paragraph contains the following inaccurate statement: “But the study by Enstrom does not contribute to the larger body of evidence on the health effects of PM2.5 . . .” In conclusion, the authors have not assessed the validity of my peer-reviewed evidence of no relationship between PM2.5 and total mortality in the CPS II cohort and have not been willing to engage with me in addressing the substantive points of my findings.

Response to Criticism by ACS Officials

The ACS Vice President of Epidemiology Susan M. Gapstur and ACS Executive Vice President and Chief Medical Officer

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Table 1. List of the 85 Counties Containing the 50 Cities Used in Pope,⁴ HEI (2000),⁵ and HEI (2009),⁶ As Well As the 35 Additional Counties Used in Enstrom (2017).^a

State	ACS Division-Unit	FIPS Code	IPN/HEI County Containing IPN/HEI City	IPN/HEI City With PM2.5 Measurements	1979–1983		1979–1983	1980	HEI Figure 5 Mortality Risk (MR)
					IPN	HEIDC	HEI	Age- Adjusted White Death Rate (DR)	
					PM2.5	PM2.5	PM2.5		
$\mu\text{g}/\text{m}^3$	$\mu\text{g}/\text{m}^3$	$\mu\text{g}/\text{m}^3$							
Alabama	01037	01073	Jefferson	Birmingham	25.6016	28.7	24.5	1025.3	0.760
Alabama	01049	01097	Mobile	Mobile	22.0296	22.0	20.9	1067.2	0.950
Arizona	03700	04013	Maricopa	Phoenix	15.7790	18.5	15.2	953.0	0.855
Arkansas	04071 + 2	05119	Pulaski	Little Rock	20.5773	20.6	17.8	1059.4	0.870
California	06001	06001	Alameda	Livermore	14.3882			1016.6	
California	06002	06007	Butte	Chico	15.4525			962.5	
California	06003	06013	Contra Costa	Richmond	13.9197			937.1	
California	06004	06019	Fresno	Fresno	18.3731	10.3	10.3	1001.4	0.680
California	06008	06029	Kern	Bakersfield	30.8628			1119.3	
California	06051 + 4	06037	Los Angeles	Los Angeles	28.2239	26.8	21.8	1035.1	0.760
California	06019	06065	Riverside	Rubidoux	42.0117			1013.9	
California	06020	06073	San Diego	San Diego	18.9189	18.9		943.7	
California	06021	06075	San Francisco	San Francisco	16.3522	16.4	12.2	1123.1	0.890
California	06025	06083	Santa Barbara	Lompoc	10.6277			892.8	
California	06026	06085	Santa Clara	San Jose	17.7884	17.8	12.4	921.9	0.885
Colorado	07004	08031	Denver	Denver	10.7675	10.8	16.1	967.3	0.925
Colorado	07047	08069	Larimer	Fort Collins	11.1226			810.5	
Colorado	07008	08101	Pueblo	Pueblo	10.9155	19.9		1024.1	
Connecticut	08001	09003	Hartford	Hartford	18.3949	18.4	14.8	952.0	0.845
Connecticut	08004	09005	Litchfield	Litchfield	11.6502			941.5	
Delaware	09002	10001	Kent	Dover	19.5280			959.4	
Delaware	09004 + 2	10003	New Castle	Wilmington	20.3743	20.4		1053.7	
District of Columbia	10001 + 2	11001	District of Columbia	Washington	25.9289	25.9	22.5	993.2	0.850
Florida	11044	12057	Hillsborough	Tampa	13.7337	13.7	11.4	1021.8	0.845
Georgia	12027 + 4	13051	Chatham	Savannah	17.8127	17.8		1029.6	
Georgia	12062	13121	Fulton	Atlanta	22.5688	22.6	20.3	1063.5	0.840
Idaho	13001	16001	Ada	Boise	18.0052	18.0	12.1	892.6	0.600
Illinois	14089 + 4	17031	Cook	Chicago	25.1019	23.0	21.0	1076.3	0.945
Illinois	14098	17197	Will	Braidwood	17.1851			1054.0	
Indiana	15045	18089	Lake	Gary	27.4759	27.5	25.2	1129.8	0.995
Indiana	15049	18097	Marion	Indianapolis	23.0925	23.1	21.1	1041.2	0.970
Kansas	17287	20173	Sedgwick	Wichita	15.0222	15.0	13.6	953.4	0.890
Kansas	17289	20177	Shawnee	Topeka	11.7518	11.8	10.3	933.7	0.830
Kentucky	18010	21019	Boyd	Ashland	37.7700			1184.6	
Kentucky	18055	21111	Jefferson	Louisville	24.2134			1095.7	
Maryland	21106 + 1	24510	Baltimore City	Baltimore	21.6922	21.7		1237.8	
Maryland	21101	24031	Montgomery	Rockville	20.2009			881.9	
Massachusetts	22105 + 1	25013	Hampden	Springfield	17.5682	17.6		1025.3	
Massachusetts	22136	25027	Worcester	Worcester	16.2641	16.3		1014.6	
Minnesota	25001 + 2	27053	Hennepin	Minneapolis	15.5172	15.5	13.7	905.3	0.815
Minnesota	25150 + 5	27123	Ramsey	St Paul	15.5823			935.7	
Mississippi	26086	28049	Hinds	Jackson	18.1339	18.1	15.7	1087.4	0.930
Missouri	27001 + 3	29095	Jackson	Kansas City	17.8488	17.8		1090.3	
Montana	28009	30063	Missoula	Missoula	17.6212			938.0	
Montana	28011	30093	Silver Bow	Butte	16.0405			1299.5	
Nebraska	30028	31055	Douglas	Omaha	15.2760	15.3	13.1	991.0	0.880
Nevada	31101	32031	Washoe	Reno	13.1184	13.1	11.8	1049.5	0.670
New Jersey	33004	34007	Camden	Camden	20.9523			1146.9	
New Jersey	33007	34013	Essex	Livingston	16.4775			1072.7	
New Jersey	33009	34017	Hudson	Jersey City	19.9121	19.9	17.3	1172.6	0.810
New Mexico	34201	35001	Bernalillo	Albuquerque	12.8865	12.9	9.0	1014.7	0.710
New York	36014	36029	Erie	Buffalo	25.1623	26.5	23.5	1085.6	0.960
New York	35001	36061	New York	New York City	23.9064	23.9		1090.4	
North Carolina	37033	37063	Durham	Durham	19.4092		16.8 ^b	1039.2	1.000
North Carolina	37064	37119	Mecklenburg	Charlotte	24.1214	24.1	22.6	932.8	0.835
Ohio	39009	39017	Butler	Middletown	25.1789			1108.3	

(continued)

Table 1. (continued)

State	ACS Division-Unit	FIPS Code	IPN/HEI County Containing IPN/HEI City	IPN/HEI City With PM2.5 Measurements	1979-1983		1979-1983	1980	HEI Figure 5 Mortality Risk (MR)
					IPN PM2.5	HEIDC PM2.5	HEI PM2.5	Age- Adjusted White Death Rate (DR)	
					$\mu\text{g}/\text{m}^3$ (Weighted Average)	$\mu\text{g}/\text{m}^3$	$\mu\text{g}/\text{m}^3$ (Median)		
Ohio	39018	39035	Cuyahoga	Cleveland	28.4120	27.9	24.6	1089.1	0.980
Ohio	39031	39061	Hamilton	Cincinnati	24.9979	25.0	23.1	1095.2	0.980
Ohio	39041	39081	Jefferson	Steubenville	29.6739	29.7	23.1	1058.6	1.145
Ohio	39050	39099	Mahoning	Youngstown	22.9404	22.9	20.2	1058.4	1.060
Ohio	39057	39113	Montgomery	Dayton	20.8120	20.8	18.8	1039.5	0.980
Ohio	39077	39153	Summit	Akron	25.9864	26.0	24.6	1064.0	1.060
Oklahoma	40055	40109	Oklahoma	Oklahoma City	14.9767	15.0	15.9	1050.4	0.985
Oregon	41019 + 1	41039	Lane	Eugene	17.1653	17.2		885.5	
Oregon	41026	41051	Multnomah	Portland	16.3537	19.8	14.7	1060.8	0.830
Pennsylvania	42101 + 1	42003	Allegheny	Pittsburgh	29.1043	30.0	17.9 ^b	1115.6	1.005
Pennsylvania	42443	42095	Northampton	Bethlehem	19.5265			998.6	
Pennsylvania	43002 + 11	42101	Philadelphia	Philadelphia	24.0704	24.1	21.4	1211.0	0.910
Rhode Island	45001 + 6	44007	Providence	Providence	14.2341	14.2	12.9	1006.1	0.890
South Carolina	46016 + 1	45019	Charleston	Charleston	16.1635			1023.5	
Tennessee	51019 + 5	47037	Davidson	Nashville	21.8944	22.6	20.5	981.9	0.845
Tennessee	51088	47065	Hamilton	Chattanooga	18.2433	20.4	16.6	1087.9	0.840
Texas	52811 + 2	48113	Dallas	Dallas	18.7594	18.8	16.5	1024.9	0.850
Texas	52859 + 3	48141	El Paso	El Paso	16.9021	16.9	15.7	903.5	0.910
Texas	52882 + 2	48201	Harris	Houston	18.0421	18.0	13.4	1025.7	0.700
Utah	53024	49035	Salt Lake	Salt Lake City	16.6590	17.5	15.4	954.3	1.025
Virginia	55024	51059	Fairfax	Fairfax	19.5425			925.7	
Virginia	55002	51710	Norfolk City	Norfolk	19.5500	19.5	16.9	1139.3	0.910
Washington	56017	53033	King	Seattle	14.9121	14.9	11.9	943.6	0.780
Washington	56032	53063	Spokane	Spokane	13.5200	13.5	9.4	959.2	0.810
West Virginia	58130	54029	Hancock	Weirton	25.9181			1094.8	
West Virginia	58207	54039	Kanawha	Charleston	21.9511	21.7	20.1	1149.5	1.005
West Virginia	58117	54069	Ohio	Wheeling	23.9840		33.4 ^b	1117.5	1.020
Wisconsin	59005	55009	Brown	Green Bay	20.5462			931.0	
Wisconsin	59052	55105	Rock	Beloit	19.8584			1019.4	

Abbreviations: ACS, American Cancer Society; HEI, Health Effects Institute; IPN, Inhalable Particulate Network; PM, particulate matter.

^aEach location includes State, primary ACS Division-Unit number and an indication of additional numbers, Federal Information Processing Standards (FIPS) code, IPN/HEI county, IPN/HEI city with PM2.5 measurements, 1979-1983 IPN-weighted average PM2.5 level, 1979-1983 HEIDC [PM2.5 (DC)] weighted average PM2.5 level, 1979-1983 HEI [PM2.5 (OI, MD)] median PM2.5 level, 1980 age-adjusted white county total death rate (annual deaths per 100 000), and HEI (2000) Figure 5 Mortality risk for HEI city (metropolitan area). All 85 counties have IPN PM2.5 data, 58 counties have HEIDC PM2.5 data, and 50 counties have HEI PM2.5 data. However, 3 cities used in HEI, (2000)⁵ (Raleigh, North Carolina; Allentown, Pennsylvania; and Huntington, West Virginia) were not part of IPN and origin of the HEI PM2.5 data in HEI (2000)⁵ Appendix D for these 3 cities (indicated with superscript letter "b") is unknown. As an approximation, the Raleigh NC PM2.5 value has been assigned to Durham, North Carolina; the Allentown, Pennsylvania, PM2.5 value to Pittsburgh, Pennsylvania, and the Huntington, West Virginia, PM2.5 value to Wheeling West Virginia.

Otis W. Brawley have not assessed the validity of my peer-reviewed findings that challenge the validity of 3 seminal CPS II-based publications: Pope,⁴ HEI (2000),⁵ and HEI (2009)⁶. They can easily check the accuracy of the results in Tables 1 to 3 of Enstrom³ and they can determine whether I have correctly identified 85 counties using the ACS Division-Unit numbers shown in Appendix Table A1. Instead, they have made statements about my article like, "we cannot confirm the data are from the CPS-II cohort" and "we cannot substantiate the claim that we provided funding for the preparation of the computerized files and documentation for this research."

I want to address the statements that ACS officials Gapstur and Brawley made about my article. In my acknowledgments, I have never stated or implied that the current ACS endorsed or

participated in my article or my use of CPS II data, because they did not endorse or participate. However, former ACS staff made it possible for me to obtain access to individual level data on both CPS I and CPS II participants, as I stated in my article. I received ACS external research support during the period 1973 to 1994. None of this ACS external research support was used for this article. However, ACS internal research support paid for all aspects of the 1982 to 1988 CPS II data that I possess: 1982 questionnaire data collection, 1982 to 1988 mortality follow-up, preparation of computer files, and preparation of detailed documentation.

The genuine version of the 1982 to 1988 CPS II data and detailed documentation that I possess did not come from the current ACS. My version was prepared by ACS many years ago, and I obtained it from a source with appropriate access to

Table 2. ACS CPS II Cohort Participants in Unit 41 (Jefferson County) of Division 39 (Ohio) Showing the Number of Researchers, Families, Participants, and Confirmed 1982 to 1988 Deaths for Each Group and for Each Researcher in Group 1.

Group Number	Researcher Number(s)	Number of Researchers	Family Codes	Number of Families	Number of Participants	Number of Confirmed 1982-1988 Deaths
1	5		1-15	15	29	2
1	6		1-17	14	20	3
1	7		1-15	15	30	1
1	8		1-10	9	19	3
1	9		1-16	15	26	1
1	10		1-14	14	27	2
1	5-10	6		82	151	12
2	1-8	7		41	78	1
3	1-4	3		25	36	1
4	1-9	8		91	168	7
5	1-9	8		82	105	16
6	4-10	4		36	37	9
Total		36		357	575	46

Abbreviations: ACS, American Cancer Society.; CPS, Cancer Prevention Study.

Table 3. Fully Adjusted Relative Risk (RR) of Death From All Causes (RR and 95% CI) From September 1, 1982, Through August 31, 1988, Associated With Change of 10 $\mu\text{g}/\text{m}^3$ Increase in PM_{2.5} for CPS II Participants Residing in 47 to 85 Counties in the Continental United States With 1979-1983 IPN PM_{2.5}, HEIDC PM_{2.5}, and HEI PM_{2.5} Measurements.^{a,b}

PM _{2.5} Years and Source	Number of Counties	Number of Participants	Number of Deaths	RR	95% CI (Lower-Upper)	Average PM _{2.5}
Fully adjusted RR for the Continental United States						
1979-1983 IPN	85	269 766	15 593	1.023	(0.997-1.049)	21.15
1979-1983 HEIDC	58	216 897	12 505	1.024	(0.987-1.061)	21.09
1979-1983 IPN	50	195 215	11 221	1.025	(0.990-1.061)	21.36
1979-1983 HEI	50	195 215	11 221	1.082	(1.039-1.128)	17.99
1979-1983 HEIDC, N = 47	47	189 676	10 836	1.023	(0.984-1.064)	20.95
1979-1983 IPN, N = 47	47	189 676	10 836	1.021	(0.984-1.058)	21.13
1979-1983 HEI, N = 47	47	189 676	10 836	1.081	(1.036-1.128)	18.01
Fully adjusted RR for the Ohio Valley Continental United States						
1979-1983 IPN	17	53 026	3293	1.096	(0.978-1.228)	25.51
1979-1983 HEIDC	10	43 945	2749	1.048	(0.922-1.191)	25.78
1979-1983 IPN	12	42 174	2652	1.050	(0.918-1.201)	25.75
1979-1983 HEI	12	42 174	2652	1.111	(0.983-1.256)	22.02
Fully adjusted RR for the non-Ohio Valley Continental United States						
1979-1983 IPN	68	216 740	12 300	0.994	(0.967-1.023)	20.09
1979-1983 HEIDC	48	172 952	9756	0.960	(0.919-1.003)	19.90
1979-1983 IPN	38	153 041	8569	0.975	(0.936-1.015)	20.15
1979-1983 HEI	38	153 041	8569	1.025	(0.975-1.078)	16.89

Abbreviations: CPS, Cancer Prevention Study; CI, confidence interval; HEI, Health Effects Institute; IPN, Inhalable Particulate Network; PM, particulate matter. ^aAnalysis includes continental United States, 5 Ohio Valley states, and remainder of the States. Table 1 lists up to 85 cities and counties with PM_{2.5} measurements ^b1979-1983 PM_{2.5} data source: IPN = EPA Inhalable Particulate Network → yields insignificant RRs; HEIDC = HEI (2000)⁵ Appendix D “PM_{2.5} (DC)” → yields insignificant RRs (apparently conducted but not reported in HEI 2000⁵); and HEI = HEI (2000)⁵ Appendix D “PM_{2.5} (OI, MD)” → yields significant RRs, used in HEI (2000)⁵.

an authorized copy of this version. I have confirmed the validity of this version by showing that (1) the numbers of participants by ACS Division agree almost exactly with the numbers shown in the Fall 1984 CPS II Newsletter (Volume 2, Number 2) Table “Final Numbers of Researchers and Participants by Division”; (2) Table 1 of Enstrom³ has age at enrollment, sex, race, and education distributions of CPS II participants that agree almost precisely with the same distributions shown in

Pope⁴ and HEI (2000)⁵; and (3) the CPS II data file information on the participants that I personally enrolled in CPS II agrees with the data that I submitted to ACS in 1982. The ACS epidemiologists can confirm the version of the CPS II data used in my article by confirming my findings in Tables 1 to 3 and Appendix Table A1.³

They claim that “when classified using the Division and Unit numbers, the geographically-defined exposure measure

will be highly inaccurate for some participants.” Actually, the Division-Unit number accurately identifies the county of residence for most CPS II participants. For instance, ACS Division 39 represents the state of Ohio, and its Unit 041 represents Jefferson County, which includes the city of Steubenville, where the PM_{2.5} measurements were made. Based on information I have obtained, at least 90% of the 575 CPS II participants in Unit 041 lived in Jefferson County as of September 1, 1982, and ACS can confirm this. In addition, ACS can confirm the detailed information that I have shown in Table 2, regarding the 575 CPS II participants in ACS Unit 041 of ACS Division 39. Table 2 shows the number of researchers, families, participants, and confirmed 1982 to 1988 deaths for the 6 ACS groups within ACS Unit 041. In addition, Table 2 shows these same numbers for each of the 6 researchers in ACS group 1. Thus, as of now, all of the findings in Enstrom³ stand unchallenged. The ACS has not produced any evidence that invalidates my CPS II cohort findings.

Additional Evidence of No PM_{2.5} Deaths in CPS II

Since the above investigators criticized my article and did not assess my null findings, I searched their 3 seminal publications for more evidence that supports my null findings. I found evidence in HEI (2000)⁵ that I had not previously recognized. Table 29 and Appendix D in HEI (2000)⁵ describe 2 key sets of 1979 to 1983 PM_{2.5} measurements: (1) PM_{2.5} (OI MD), which is “median fine particle mass from Original Investigators” for 50 cities and designated by me as HEI PM_{2.5} and (2) PM_{2.5} (DC), which is “mean fine particle fraction from dichotomous sampler” values for 58 IPN cities and designated by me as HEIDC PM_{2.5}. The PM_{2.5} (OI MD) values are the ones used in Pope.⁴ I now realize that most of the HEIDC PM_{2.5} [PM_{2.5} (DC)] values are the same to 1 decimal point as the IPN PM_{2.5} values in Enstrom.³

Table 1 shows that the IPN PM_{2.5} and HEIDC PM_{2.5} are identical for 45 cities and somewhat different for 13 cities in HEI (2000)⁵ Appendix D. Three cities with PM_{2.5} (OI MD) values (Raleigh, North Carolina; Allentown, Pennsylvania; and Huntington, West Virginia) were not part of IPN and it is not clear how the PM_{2.5} values for these 3 cities were measured. As an approximation, the Raleigh NC PM_{2.5} value has been assigned to Durham, North Carolina, and the Allentown, Pennsylvania, PM_{2.5} value has been assigned to Pittsburgh, Pennsylvania, and the Huntington, West Virginia, PM_{2.5} value has been assigned to Wheeling, West Virginia. Two cities in HEI (2000)⁵ Appendix D (Boston, Massachusetts and St Louis, Missouri) were not used because of unclear ACS Division-Unit numbers. Table 1 is an expanded version of Appendix Table A1 in Enstrom.³ Table 3 shows relative risks (RRs) based on IPN PM_{2.5}, HEIDC PM_{2.5}, and HEI PM_{2.5} values for 85, 58, 50, and 47 cities/counties. The RRs based on the HEIDC PM_{2.5} values are essentially identical to the null RRs based on the IPN PM_{2.5} values. Only the RRs based on HEI PM_{2.5} values are significantly positive, as shown in Enstrom.³ I find

it surprising that the null RRs based on the HEIDC PM_{2.5} values were not included in HEI (2000)⁵ or HEI (2009).⁶

The HEI (2000)⁵ Sensitivity Analysis “Risk Estimates Based on Alternative Air Quality Data” section states on page 170, “The means or medians of various indices of air pollution are summarized in Table 30.” The data included in this section reveal that the investigators seemed to be aware of the differences in mortality risk associated with PM_{2.5} (OI MD) and PM_{2.5} (DC). Table 31 shows RR (all causes) = 1.18 (1.09-1.26) based on PM_{2.5} (OI MD) values for 50 cities. This value is reduced to RR (all causes) = 1.12 (1.06-1.19) based on PM_{2.5} (DC) values for 63 cities. Both of these RRs are based on a maximum change in PM_{2.5} of 24.5 µg/m³. I did not previously recognize the similarity between the PM_{2.5} (DC) values and the IPN PM_{2.5} values because the only mention of IPN in HEI (2000)⁵ occurs in the footnote at the end of Appendix D of Table D.1. Everywhere else in HEI (2000),⁵ the term Inhalable Particulate Monitoring Network is used.

It appears that the investigators themselves found no relationship between PM_{2.5} and total mortality in CPS II in the 2007 *SERRA* article authored by Jerrett et al.⁷ Although they cited 16 of their CPS II analyses in their Table 1, they did not cite Jerrett.⁷ Figure 2 from Jerrett⁷ shows no relationship between PM_{2.5} and total (all-cause) deaths during 1982 to 2000 in the CPS II cohort. The following quote accompanies Figure 2 “3.1 Health effects The RRs of mortality across the period of follow-up based on the subset of the 51 cities considered were smaller than in the full air pollution cohort considered in the previously full ACS cohort For example, all-cause mortality was significantly elevated by 6% in the larger cohort, but generally was not significantly elevated in these sub analyses.” In addition, Figure 3 (A and B) from Jerrett⁷ shows no relationship between PM_{2.5} and total (all-cause) deaths during 1982 to 1986, 1987 to 1990, 1991 to 1994, 1995 to 1998, and 1999 to 2000. Furthermore, they found low RRs outside the Ohio Valley, as they state in the Discussion section on page 518, “Overall estimated RRs in the 51 cities used in this study were lower than in previous national studies. The lower RR estimates probably resulted from the exclusion of cities in the Ohio River Valley, which tended to demonstrate larger RRs from air pollution than other geographic regions” Figures 2 and 3 (A and B) from Jerrett⁷ are reprinted here.

On June 12, 2017, HEI President Daniel Greenbaum (Greenbaum) provided me with the July 25, 1997 HEI Reanalysis Project Request for Qualifications (RFQ) (<http://www.scientificintegrityinstitute.org/Greenbaum061217.pdf>). This RFQ specifies the background and requirements for the HEI Reanalysis Project: “HEI is seeking applications representing teams consisting of 2-4 epidemiologists, statisticians and air pollution exposure experts.” According to Greenbaum, responses to the RFQ were received from 13 teams and HEI selected the 31-member Krewski team based at the University of Ottawa in Canada, apparently the only foreign-based team. The RFQ objectives and scope include this sentence: “(2) Conduct sensitivity analyses to test the robustness of the original

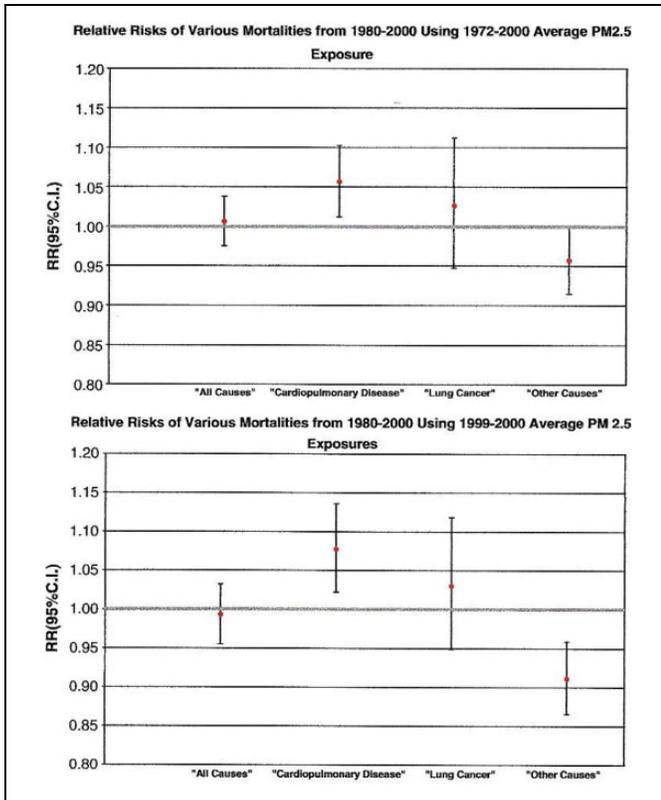


Figure 2 (Jerrett⁷). Summary of risks for different exposures over the entire follow-up.

findings and interpretations to alternative analytic approaches” (<http://www.scientificintegrityinstitute.org/HEIRFQ072597.pdf>). The Enstrom³ findings challenge whether the robustness of the Pope⁴ findings was properly tested with alternative PM_{2.5} data, such as IPN PM_{2.5} data, or alternative cities and counties and metropolitan areas within the CPS II cohort. I first published in 2005 the total mortality RRs for all 11 California counties in the CPS I cohort with IPN PM_{2.5} data.⁸

Cohen, Pope, and Burnett provided indirect support for my findings in their May 13, 2017, *Lancet* “Global Burden of Disease” article, which went online April 10, 2017.⁹ Table 2 from this article shows that, based on their own PM_{2.5} deaths evidence, the United States had a very low 2015 annual PM_{2.5}-related death rate (18.5 deaths per 100 000 persons) and very low average ambient PM_{2.5} exposure (8.4 $\mu\text{g}/\text{m}^3$). This table also shows that PM_{2.5} pollution is concentrated in other parts of the world, particularly China, India, and Africa, and not in the United States. In addition to the evidence of no PM_{2.5}-related deaths in the CPS II cohort, there is null evidence in 2 other national cohorts: the NIH-AARP cohort¹⁰ and the Veterans cohort.¹¹

The null PM_{2.5} total mortality evidence is further described in my August 12, 2017, Doctors for Disaster Preparedness talk “Scientific Misconduct in PM_{2.5} Epidemiology” (<https://www.youtube.com/watch?v=DaFUhJxMNco>), my October 12, 2017, NEJM letter “Air pollution and mortality in the Medicare population,”¹² my November 9, 2017, America First Energy Conference talk “ACS Promotes Air Pollution

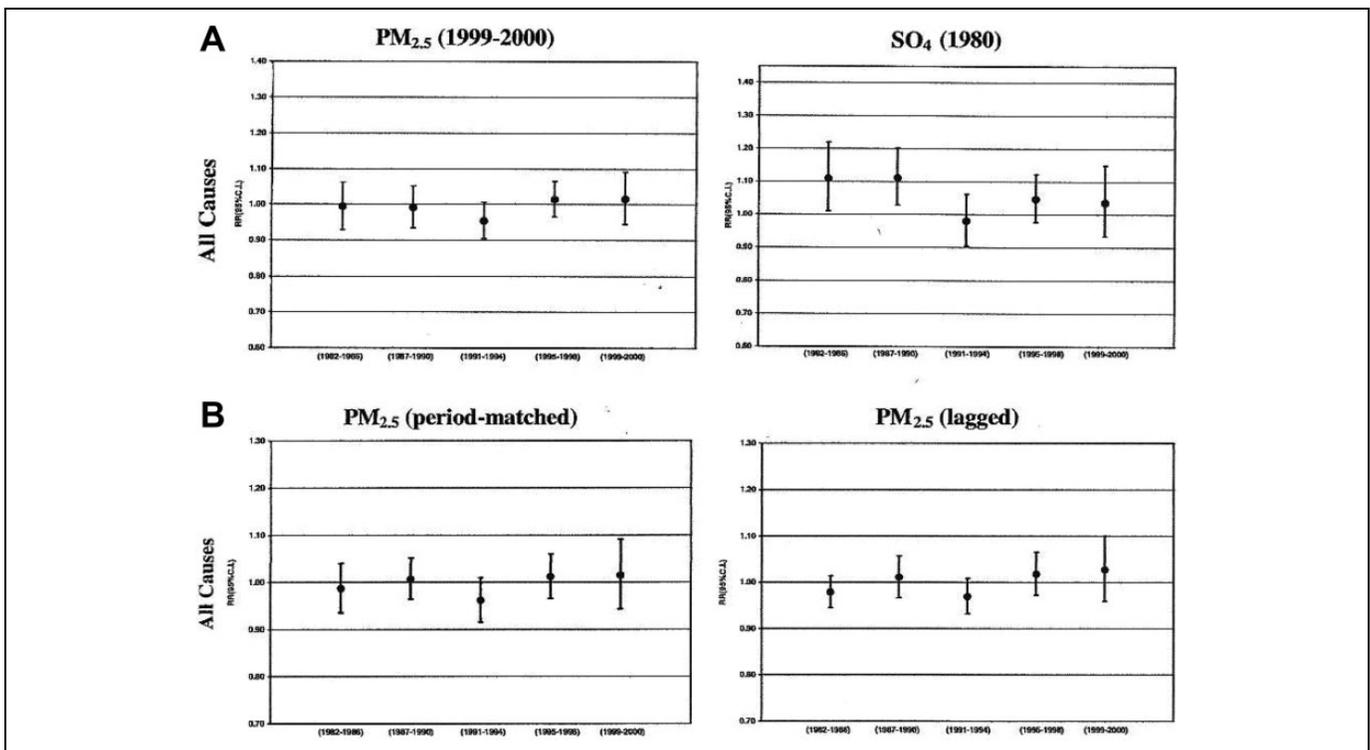


Figure 3 (Jerrett⁷). (A) Relative risks for all-cause, cardiopulmonary and lung cancer deaths estimated for five time periods of the follow-up (1982–1986, 1987–1990, 1991–1994, 1995–1998, and 1999–2000) with measured exposures. (B) Relative risks for all-cause, cardiopulmonary and lung cancer deaths estimated for five time periods of the follow-up (1982–1986, 1987–1990, 1991–1994, 1995–1998, and 1999–2000) with imputed exposures.

Pseudoscience” (<http://americafirstenergy.org>), and my key 2017 correspondence with the above investigators (<http://www.scientificintegrityinstitute.org/DREmails101317.pdf>).

Conclusions

My findings of no PM_{2.5}-related deaths during 1982 to 1988 in the CPS II cohort, which are based on my peer-reviewed reanalysis of the CPS II data, stand unchallenged.³ In addition, my null findings challenge the positive findings in 3 seminal publications by Pope,⁴ HEI 2000,⁵ and HEI 2009⁶ as not robust and not supportive of the claim that PM_{2.5} causes premature deaths. The responses by Pope¹ and Gapstur² have failed to assess the validity or significance of my null findings,³ but letters supporting the validity of my null findings have been published by Drs S. Stanley Young,¹³ Frederick W. Lipfert,¹⁴ and John D. Dunn.¹⁵

Every effort is being made to encourage ACS, HEI, and the CPS II investigators to cooperate in transparent and verifiable analyses of the CPS II cohort data. However, given the unchallenged null findings in Enstrom,³ the Environmental Protection Agency (EPA) must reassess all CPS II evidence relating PM_{2.5} to mortality as part of the current integrated science assessment of the PM_{2.5} National Ambient Air Quality Standard (NAAQS).

Declaration of Conflicting Interests

The author(s) declared no potential conflicts of interest with respect to the research, authorship, and/or publication of this article.

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Scientific Distortions in Fine Particulate Matter Epidemiology

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

ABSTRACT

The theoretical prevention of premature deaths from the inhalation of fine particulate matter is being used by the U.S. Environmental Protection Agency (EPA) to justify the National Ambient Air Quality Standard (NAAQS) and multibillion dollar regulations across the U.S., including the EPA Clean Power Plan and the California Air Resources Board (CARB) Truck and Bus Regulation. The epidemiology is severely flawed. Fine particulates probably make no significant contribution to premature mortality in the U.S. The publication of null findings has been blocked or marginalized and studies claiming excess mortality need to be reassessed.

Basics of Fine Particulate Matter

Fine particulate matter (PM_{2.5}) is defined by its size (≤ 2.5 μm diameter), not its composition. Major sources in the U.S. are forest fires, commercial and residential burning, and diesel engines. In California, a major source is China; on some days up to 30% of fine particulates had crossed the Pacific Ocean.

Of these invisible particles, the average adult in the U.S., based on actual 2015 exposure levels, would inhale about 1 gram in an 80-year lifespan, assuming that he breathes about 10,000 liters of air a day at rest. For comparison, the amount inhaled while smoking 100 cigarettes is about 4 grams.¹

In 1997, the EPA established the NAAQS for PM_{2.5} as 15 $\mu\text{g}/\text{m}^3$. This was lowered to 12 $\mu\text{g}/\text{m}^3$ in 2012. This standard has been largely justified on the basis of secret science epidemiology. These regulations are very powerful and impose huge costs on American businesses. The PM_{2.5} NAAQS, has been used to justify several multi-billion-dollar rules, such as the EPA Clean Power Plan and the CARB Truck and Bus Regulation.

Although a significant effect from such extremely low levels is on its face highly implausible, the stringent EPA regulations are justified primarily by a claim of preventing premature deaths, assuming a value of \$10 million per statistical life saved. The controversy over the issue was brought to general attention in 2002 by Professor Robert Phalen.²

Epidemiology of Fine Particulate Matter

The EPA claim that PM_{2.5} causes "premature deaths" is based on epidemiologic cohort studies purporting to show that the relative risk (RR) for total mortality is slightly greater than 1.0 in U.S. populations exposed to higher levels of PM_{2.5}. No etiologic mechanism has been established, and there is no experimental evidence that inhalation of 1 g or 5 g of PM_{2.5} can cause death. Weakly positive RRs do not prove causality. Major difficulties include: (1) geographic and temporal variation in PM_{2.5} mortality risk; (2) exaggeration of actual human exposure by PM_{2.5} monitors, which measure ambient outdoor levels

far from the subjects; and (3) confounding variables such as co-pollutants. Moreover, the key study relied on by EPA, the American Cancer Society (ACS) 1982 Cancer Prevention Study (CPS II)³ is seriously flawed.

Reanalysis of the American Cancer Society Cancer Prevention Study II (ACS CPS II)

CPS II began in 1982 and is similar to the original CPS I, which began in 1959. The seminal paper published by Pope et al. in 1995³ was so controversial that the Health Effects Institute (HEI) sought applications from teams consisting of two to four epidemiologists, statisticians, and air pollution exposure experts to conduct a reanalysis, including "sensitivity analyses to test the robustness of the original findings and interpretations to alternative analytic approaches."⁴ The HEI Reanalysis published in 2000 did not complete the mandated sensitivity analysis to assess the effect of alternate data.⁵ HEI published a report in 2009,⁶ which extended the mortality follow-up of the study from 1989 to 2000, but it did not incorporate the EPA Inhalable Particulate Network (IPN) PM_{2.5} data^{7,8} that I had called to the authors' attention in my 2005 paper.⁹

In 2016 I was able to obtain access to data in an original 1982-1988 version of CPS II. The data had been previously inaccessible since 1995 despite a congressional subpoena and repeated requests by different agencies. I am the only independent scientist who has gained access to the individual level data in both CPS I and CPS II. I was able to reproduce the same key results as Pope et al. by doing exactly what the authors did in 1995.³ However, their results were sensitive to the PM_{2.5} data that they used and to their particular analysis.

HEI did not follow its own mandate to conduct a comprehensive reanalysis. In particular, their sensitivity analysis was not done properly. Of the 13 teams that submitted reanalysis applications, HEI selected a 31-member team based in Canada, headed by statistician Daniel Krewski. It included a geographer, Michael Jerrett, and another statistician, Richard Burnett, but only had one epidemiologist, Yue Chen. Chen's degree was from Shanghai Medical University, and he was not a coauthor on either the 2000 HEI report⁵ or the 2009 HEI report.⁶ Thus, to reanalyze a major U.S. epidemiological study, HEI used a Canadian team that had essentially no epidemiologist.

An early clue to the existence of problems is seen in Figure 21 in the 2000 HEI Reanalysis Report.⁵ (Figure 1 in this article.) This map shows that in 50 cities across the U.S. the level of PM_{2.5} mortality risk varies. Higher risks were found mainly in the Rust Belt or the Ohio Valley, and levels were actually reasonably low in California and throughout most of the western part of the U.S. Beginning in 2002, I asked the head of HEI, Daniel Greenbaum, and its principal scientist, Aaron Cohen, to send me the underlying data for that map. For 16 years, they have consistently refused to reveal this data to me.

2000 Krewski HEI Reanalysis Report Figure 21 1982-1989 CPS II PM_{2.5} Mortality Risk Varies in US

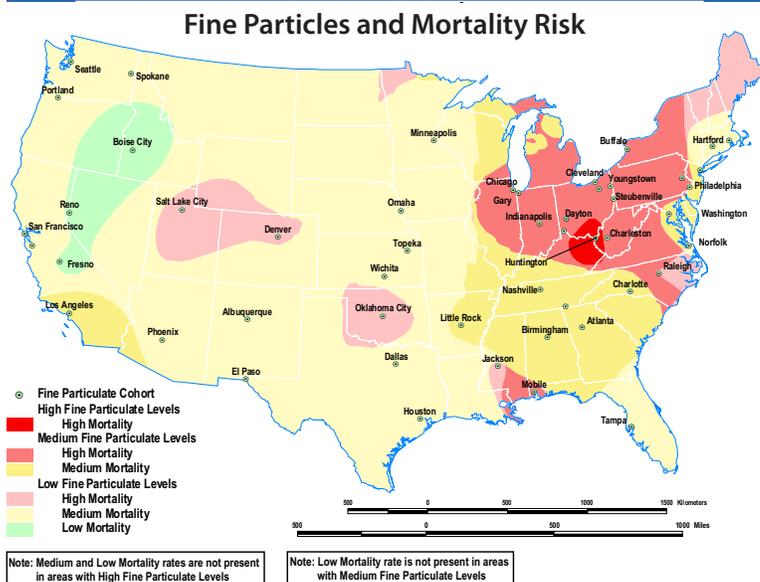


Figure 1. PM_{2.5} Levels and Mortality Risk in the U.S. [Reprinted from 2000 HEI Reanalysis Report,⁵ with permission.]

My analysis of the CPS II data revealed that the county of residence of subjects could be approximated based on the ACS Division and Unit numbers. The CPS II data were collected by about 70,000 researchers, including myself, who enrolled 1.2 million subjects in Fall 1982. I performed an analysis comparable to the HEI Reanalysis, as shown in Table 1. The PM_{2.5} data labeled IPN in the table was published in EPA reports from the Inhalable Particulate Network (IPN) by David Hinton et al. in 1984⁷ and 1986.⁸ Because of the evasions that I have experienced in attempting to obtain information from HEI, I took a closer look at the 2000 HEI Reanalysis Report and found it actually contains the data that I used, although in a mislabeled and somewhat altered form. I have designated that data as HEIDC, which is labeled PM_{2.5} DC in the 2000 Report. This data was indirectly referred to in a couple of places in the 2000 HEI report, although it was not analyzed.

Enstrom 2017 Analysis of PM _{2.5} and Total Mortality During 1982-1988 in ACS CPS II Cohort: HEIDC		
1979-83 PM _{2.5}	Subjects	Relative Risk (95% CI)
Fully Adjusted for 50 Counties in Continental US		
IPN [Hinton]	195,215	1.025 (0.990-1.061)
HEIDC [PM _{2.5} DC]	216,897	1.024 (0.987-1.061)
HEI [PM _{2.5} OI MD]	195,215	1.082 (1.039-1.128)
Fully Adjusted for Ohio Valley (IN,KY,OH,PA,WV)		
IPN	42,174	1.050 (0.918-1.201)
HEIDC	43,945	1.048 (0.922-1.191)
HEI	42,174	1.111 (0.983-1.256)
Fully Adjusted for States Other Than Ohio Valley		
IPN	153,041	0.975 (0.936-1.051)
HEIDC	172,952	0.960 (0.919-1.003)
HEI	153,041	1.025 (0.975-1.078)

Table 1. Enstrom Analyses of ACS CPS II Data Using Three Sources of PM_{2.5} Data

Thus, using the HEI PM_{2.5} data of Pope et al.,³ there is a statistically significant slight increase in RR of 1.082. That means that if the PM_{2.5} level increases by 10 µg/m³, the risk of dying goes up by about 8%. But, using the IPN PM_{2.5} data, the effect is nonsignificant, RR = 1.025 (95% CI, 0.990-1.061). Note that if one divides the U.S. into the Ohio Valley (Indiana, Kentucky, Ohio, Pennsylvania, and West Virginia) and the rest of the country, the RR is indistinguishable from 1.0, no matter what PM_{2.5} data is used. Only by combining the Ohio Valley, which has both a higher mortality risk and a higher level of PM_{2.5}, with the rest of the country can HEI show a statistically significant effect.

My reanalysis¹⁰ has been published online since Mar 28, 2017, and so far its validity has not been challenged.

The selection of data by HEI was also very interesting, as seen in Table 2. There were actually 11 counties in California that were part of the IPN network, and the HEI analyses omitted 7 of the 11 counties for reasons the authors have not explained. HEI had data from 50 different cities, and the only ones they included from California were Fresno, Los Angeles, San Francisco, and San Jose (in Santa Clara County). Two other counties that represent the extremes in PM_{2.5} levels are highlighted in the table. The Pope 1995 paper³ was based primarily on these extremes. HEI had Albuquerque, N.M., at 9 µg/m³, as the lowest value, and Huntington, W.V., at 34.4 µg/m³, as the highest value. This is curious because the data that comes from the IPN network actually shows different high and low values. In fact, there is no measurement in the IPN for Huntington, W.V., but rather for Wheeling, W.V., listed in the IPN column. From the table, both the low and the high values are in California, both of which omitted from the HEI analysis. The low value is 10.6 µg/m³ in Santa Barbara County, and the high value is 42.0 µg/m³ in Riverside County. The PM_{2.5} DC data that I found in the 2000 HEI Report appendix table, labeled HEIDC by me, had more than 50 cities, but only five of the 63 total cities were from California. The IPN network as a whole has about 85 cities. These major inconsistencies need to be addressed by these investigators. And so far, there is nothing but silence. This is only one of the issues that must be addressed if the investigators want to maintain any credibility.

CA NM WV Counties with PM _{2.5} Values Used in Pope 1995, HEI 2000, HEI 2009, Enstrom 2017					
State	ACS Div-Unit	County	1979-83 PM _{2.5} (µg/m ³)		
			IPN (N=85)	HEIDC (N=63)	HEI (N=50)
CA	06001	Alameda	14.3882		
CA	06002	Butte	15.4525		
CA	06003	Contra Costa	13.9197		
CA	06004	Fresno	18.3731	10.3	10.3
CA	06008	Kern	30.8628		
CA	06051	Los Angeles	28.2239	26.8	21.8
CA	06019	Riverside	42.0117		
CA	06020	San Diego	18.9189	18.9	
CA	06021	San Francisco	16.3522	16.4	12.2
CA	06025	Santa Barbara	10.6277		
CA	06026	Santa Clara	17.7884	17.8	12.4
NM	34201	Bernalillo	12.8865	12.9	9.0 ⁴
WV	58117	Ohio	23.9840		[33.4]

Table 2. Comparison of Data on PM_{2.5} and Mortality from Enstrom and HEI⁹

Relationship between PM_{2.5} and Mortality in California

Because of the Feb 26, 2010, conference in Sacramento, which I attended along with Professor Robert Phalen, other prominent scientists, and impacted business groups, we were able to get an analysis done by HEI that dealt with the California portion of the national CPS II results. The California data was partitioned out from the national analysis in the 2009 HEI Report.⁶ Based on the four HEI California counties shown in Table 2, the RR is about 0.9, significantly below 1.0, as shown in Table 3. This inverse relationship was reproduced using either the HEI data or the IPN data. Of course, this relationship cannot be etiologically correct, but it shows what can result from data omission and manipulation.

Enstrom 2017 Analysis of PM_{2.5} and Total Mortality During 1982-1988 in California ACS CPS II Cohort Compared with Krewski 2010 HEI Special Analysis

<u>1979-83 PM_{2.5}</u>	<u>Subjects</u>	<u>Relative Risk (95% CI)</u>
Enstrom 2017 Fully Adjusted For 1982-1988 Deaths		
IPN (4 Counties)	36,201	0.879 (0.805-0.960)
HEI (4 Counties)	36,201	0.870 (0.788-0.960)
Krewski 2010 Fully Adjusted For 1982-1989 Deaths		
"Same" Standard Cox Model		
HEI (4 Counties)	40,408	0.872 (0.805-0.944)
"Different" Standard Cox Model		
HEI (4 Counties)	38,925	0.893 (0.823-0.969)

Table 3. Relative Risk for PM_{2.5} and Mortality in California Based on Four Counties

There are actually six California cohorts that have been used to analyze the relationship between PM_{2.5} and total mortality, as shown in Table 4. The cohort that I initially used is labeled CA CPS I;⁹ the cohort used by Jerrett et al.¹¹ is labeled CA CPS II. The Adventist Health Study of Smog (AHSMOG) was the original cohort study in California.¹² There are also the California Teachers Cohort,¹⁰ the "West" portion of the Medicare Cohort Air Pollution Study (MCAPS),¹³ and the National Institutes of Health-American Association of Retired Persons (NIH AARP) cohort, which was published in 2016 by Thurston et al.¹⁴ The NIH AARP cohort is supposed to be an open access database, but is apparently currently controlled by Thurston. I have been able to get access to only the California portion of the data, and my analysis shows no effect in California. Averaging all six cohorts gives an RR of exactly 1.00, which means no relationship between PM_{2.5} and total mortality.

The lack of an effect in California might explain why Pope et al.³ omitted seven California cities from the national analysis. As Figure 1 shows, there is tremendous variation across the country. Yet the most severe regulations are in California, despite the clear absence of mortality risk there!

PM_{2.5} and Total Mortality in California: Six Cohorts

<u>Author & Year</u>	<u>CA Cohort</u>	<u>Relative Risk (95% CI)</u>
McDonnell 2000	AHSMOG	RR ~ 1.03 (0.95-1.12)
Enstrom 2005	CA CPS I	RR = 1.00 (0.98-1.02)
Zeger 2008	MCAPS "West"	RR = 0.99 (0.97-1.01)
Jerrett 2011 9 RRs	CA CPS II	RR = 1.00 (0.99-1.01)
Ostro 2015	CA Teachers	RR = 1.01 (0.98-1.05)
Thurston 2016	CA NIH AARP	RR = 1.02 (0.99-1.04)
Weighted Average (Six Cohorts)		RR = 1.00 (0.99-1.01)

(<http://scientificintegrityinstitute.org/ORI111116.pdf>)

Table 4. PM_{2.5} and Total Mortality in Six California Cohorts

Both my analysis and that by Thurston et al. on the NIH AARP cohort,¹⁴ summarized in Table 5, show no effect nationwide or in California.

PM_{2.5} and Total Mortality in US and California: Enstrom 2017 re 1982-1988 ACS CPS II Cohort Thurston 2016 re 2000-2009 NIH AARP Cohort

<u>Geographic Area</u>	<u>Subjects</u>	<u>Relative Risk (95% CI)</u>
United States		
Enstrom Analysis Fully Adjusted for 1982-1988 Deaths		
85 Counties	269,766	1.023 (0.997-1.049)
Thurston Analysis Fully Adjusted for 2000-2009 Deaths		
6 States & 2 Cities	517,041	~1.025 (1.000-1.049)
California		
Enstrom Analysis Fully Adjusted for 1982-1988 Deaths		
11 Counties	60,521	0.992 (0.954-1.032)
Thurston Analysis Fully Adjusted for 2000-2009 Deaths		
58 Counties	160,209	~1.017 (0.990-1.040)

Table 5. Comparison of Enstrom and Thurston Analyses for U.S. and California

An International Perspective on PM_{2.5}

Despite the null effect shown by their own data and analyses, prominent advocates of drastic measures to reduce PM_{2.5} levels state in a major paper in the May 13, 2017, *Lancet* that ambient PM_{2.5} was the fifth-ranking mortality risk factor worldwide in 2015. Aaron J. Cohen, until recently HEI Principal Scientist, is the lead author, and Pope is a coauthor. The study is part of the World Health Organization (WHO) Global Burden of Disease (GBD) Project and was largely funded by HEI. The article claims that PM_{2.5} causes 4.2 million deaths annually worldwide, with 88,000 deaths in the U.S. (see Table 6). The mean PM_{2.5} level is 8.4 µg/m³ in the U.S. and 58.4 µg/m³ in China. Clearly, the PM_{2.5} level and premature deaths are low in the U.S. and high in China, India, and Africa.

**May 13, 2017 (on line April 10, 2017) *Lancet*
'Global Burden of Disease' by Cohen & Pope**

2015 Deaths Attributed to PM_{2.5}

Table 2

<u>Country</u>	<u>Deaths</u>	<u>Death Rate</u> (per 100,000)	<u>Mean PM_{2.5}</u> (µg/m ³)
USA	88,400	18.5	8.4
China	1,108,100	84.3	58.4
India	1,090,400	133.5	74.3
Pakistan	135,100	136.3	65.0
Bangladesh	122,400	133.2	89.4
World	4,200,000		

Table 6. Global Deaths Attributed to PM_{2.5}¹⁵

Agenda-driven Science

Since publishing my 2005 critique of the relationship between PM_{2.5} and total mortality⁹ and my 2017 critique,¹⁰ I have sent numerous requests to Pope, ACS, HEI, and others, inviting a rebuttal. I have received no response that confirms or refutes any of my analyses. It has, however, been incorrectly asserted that, "The study by Enstrom does not contribute to the larger body of evidence on the health effects of PM_{2.5}." ACS has criticized me for having CPS II data that they have deliberately tried to keep secret. My invitations to authors and ACS officials to attend meetings, teleconferences, and symposia have simply been ignored. They even ignored an August 1, 2013, subpoena from the U.S. House Science, Space, and Technology Committee.

The control over air pollution research and assessments that is recognized by EPA is not based on special expertise in epidemiology. Pope, the self-proclaimed "world's leading expert on the effects of air pollution on health," is a professor of economics at Brigham Young University and holds a 1981 Ph.D. in agricultural economics from Iowa State University, where he studied the dynamics of crop yields. Michael Jerrett, who is one of the most prolific publishers and a member of the HEI reanalysis team, has a 1996 Ph.D. in geography from the University of Toronto, and no formal training in epidemiology. Aaron J. Cohen, until recently HEI's Principal Scientist, does hold a 1991 D.Sc. degree in epidemiology from Boston University, but he has badly misused the principles and standards of epidemiology. Although he supervised the 1998-2000 HEI Reanalysis Project, he has refused to clarify findings from this project and has refused to confirm or refute the findings in my 2017 CPS II reanalysis. It is very disturbing that ACS has allowed CPS II data to be used for more than 20 years for research that misuses the principles and standards of epidemiology and that has nothing significant to do with cancer.

The principal qualification for admission to the elite circle of influence appears to be dedication to the agenda of global controls on economic activity via air pollution regulations. The conclusion reached by researchers is

apparently predetermined, as stated in the last paragraph of the GBD study on ambient air pollution: "As the experience in the U.S. suggests, changes in ambient PM_{2.5} associated with aggressive air quality management programmes, focused on major sources of air pollution including coal combustion, household burning of solid fuels, and road transport, can lead to increased life expectancy over short timeframes."¹⁵

What is the state of scientific integrity? It is very dangerous to one's career to criticize views backed by powerful interests, and I do it only because I believe current trends are anti-science and dangerous to our country. Simply being a passive observer is no longer acceptable.

To disclose my own background, I obtained a Ph.D. in physics in 1970, but I became an epidemiologist starting in 1973 in order to apply the rigorous principles of physics to observational epidemiology. I had a long career as a research professor and researcher at the UCLA School of Public Health. My research has examined the influence of environmental and lifestyle factors on mortality, and has on occasion reached politically incorrect conclusions. My research in air pollution epidemiology has been strongly influenced by Dr. Frederick Lipfert and Professor Robert Phalen. In February 2010 I was terminated from UCLA without warning and told that my "research is not aligned with the academic mission of the Department." In February 2015 I settled a three-year federal whistleblower retaliation lawsuit against UCLA and my termination was reversed. My case and some of the issues related to my air pollution epidemiology research have been discussed in this journal.¹⁶

My background and publications, including rejections of my research, often without peer review, are documented on my website, www.scientificintegrityinstitute.org. I believe that major journals simply will not accept articles that challenge the established view. Moreover, authors of the papers promoting PM_{2.5} premature deaths omit null results, even their own. For example, Jerrett is the lead author of a 2007 study that shows no increased mortality associated with PM_{2.5} in the CPS II cohort if the results are divided into five time periods.¹⁷ Although researchers are paid millions of dollars, they're not under any obligation to address any of the concerns about their work. Those who disagree with the agenda are denied research funding.

We must prevent American science from following historical examples like that of Trofim Denisovich Lysenko. He was a phony plant geneticist, who gained the favor of Joseph Stalin because he didn't believe in Mendelian genetics. Lysenko's views controlled much of Soviet agriculture in the 1930s, 1940s, and 1950s, with devastating effect. False crop statistics were published, and dissenting scientists were purged. Nikolai Vavilov, a renowned plant geneticist, was imprisoned by Stalin and died of malnutrition.

Concerns about integrity in Western science are being raised. Richard Horton, editor of *The Lancet*, writes: "The case against science is straightforward: much of the scientific literature, perhaps half, may simply be untrue. Afflicted by studies with small sample sizes, tiny effects, invalid exploratory analyses, and flagrant conflicts of interest, together with an obsession for pursuing fashionable trends of dubious importance, science has taken a turn towards darkness."¹⁸

A U.S. House of Representatives bill called the Secret Science Reform Act was passed in 2014 and 2015 in order “to prohibit the Environmental Protection Agency from proposing, finalizing, and disseminating regulations or assessments based upon science that is not transparent or reproducible.” The bill was revived in 2017 as the Honest and Open New EPA Science Treatment (HONEST) Act, labeled H.R. 1430, and was passed by the U.S. House of Representatives.

American science needs to guard against the heirs of Sinclair Lewis’s protagonist in his 1927 novel *Elmer Gantry*, an itinerant preacher who is able to sell false religion to gullible people. We have prominent scientists who have successfully sold the notion that inhaling 1 g of invisible particles over an 80-year lifetime can cause premature death.

Conclusions

There is strong evidence from two large national cohorts that PM_{2.5} does not cause premature deaths in the US. There is strong evidence that this relationship has been falsified by EPA, the Health Effects Institute, and leading researchers for more than 20 years. Better oversight to assure scientific integrity, such as access to data, transparency, and consideration of opposing views, is imperative.

James E. Enstrom, Ph.D., M.P.H., a physicist and epidemiologist, is a retired research professor from the University of California, Los Angeles, and president of the Scientific Integrity Institute in Los Angeles. Contact: jenstr@ucla.edu

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John Telles

November 16, 2009

Ellen Peters, Chief Counsel
Office of Legal Affairs
California Air Resources Board

Dear Ellen,

My review of the events and circumstances preceding the December 12, 2008 vote on the Truck Rule has revealed documented facts and pertinent information not brought to the attention of Board Members prior to the Vote on the Truck Rule. Key CARB personnel knew that the Project Coordinator and Lead Author (the Individual) of the report, "Methodology for Estimating Premature Death Associated with Long-term Exposure to Fine Airborne Particulate Matter in California" had misrepresented his credentials by falsely claiming that he had a Ph.D. in Statistics from the University of California at Davis. Key CARB personnel failed to inform the full Board and the public of this information.

In CARB's own internal documents this information was deemed pertinent. CARB, in a communication sent to the Individual stated, "your dishonesty regarding your education has called into question the validity of the report "Methodology for Estimating Premature Death Associated with Long-Term Exposure to Fine Airborne Particulate Matter in California" in which you were the Project Coordinator and Lead Author. This report in turn supports other controversial and critical regulations adopted by Air Resources Board." (Exhibit #1) The Methodology Report was pertinent to the Truck Rule because it supports Appendices D (Health Impacts from On-Road Diesel Vehicles) and Appendices E (Health Risk Assessment Methodology) which make the fundamental argument for the reason for rule making (Exhibit #2).

This information is material to the Vote because had I as a Board Member been informed of this information, I would have and perhaps other Board members would have moved to suspend the Vote. I believe that it is the ethical if not legal obligation for Staff and Board Members to inform the whole Board of all pertinent information prior to a Vote on a State Regulation so that a Board Member may make an informed decision when casting a vote.

The following is a brief outline of information that came to the attention of key CARB personnel prior to the Vote:

In a letter dated July 7, 2008 sent to Governor Schwarzenegger, Dr. Stanley Young of the National Institute of Statistical Science stated that none of the authors of the draft "Methodologies for Estimating Premature Death Associated with Long-Term Exposure

to Fine Airborne Particulate Matter in California” are professional statisticians (Exhibit #3). The duty of drafting a response to this inquiry was given to the Project Coordinator and Lead Author of the Report, the very person who later confesses that he misrepresented his credentials. (Exhibit #4). In this draft, the Lead Author falsely claims that he has a Ph.D. from University of California at Davis. This drafted letter, dated November 4, 2008, was signed by the Secretary of the California EPA and was sent to Dr. Young (Exhibit #5). To date, Dr. Young has not received a letter from the Secretary of the California EPA correcting this false claim (Exhibit #6).

On December 3rd and 4th, 2008, a professor from UCLA communicated to three CARB Board members alleging that the Individual did not have a Ph.D. in Statistics from UC Davis (Exhibit #7). At least one Board Member called Senior Staff at CARB and an investigation was initiated. On December 8, 2008, the Chief of the Research Division asked the Individual if he had a Ph.D. in Statistics from UC Davis (Exhibit #8). The Individual on the evening of December 10, 2008, confessed to the Chief of the Research Division that he did not have such a credential. The following morning, the day the ARB had convened to deliberate on the Truck Rule, this Chief informed the Executive Officer, the Chief Deputy Executive Officer, the Deputy Executive Officer, the Chief of the Heavy Duty Diesel In-Use Strategies, the Chief of the Mobil Source Control Division, the Chief of the Health and Exposure Assessment Branch and at least one Board Member of the Individual’s confession (Exhibit #9). This information was not, however, relayed to the full Board.

It was not until nine months later at the public meeting of CARB in Diamond Bar on September 24, 2009, after public testimony raised this issue, that Staff informed the Board for the first time that the Project Coordinator and Lead Author of a supporting document of the Truck Rule had falsified his credentials (Exhibit #11). At that time Staff made no mention of the fact that they possessed this information prior to the Vote on the Truck Rule. Last week, on November 11, 2009, I learned that the Chair of CARB was also aware of this information prior to the Vote (Exhibit #10). Thus, neither the Staff nor the Board Chair informed the full board of this discovery prior to the Vote. The Public, of course, was also not informed.

In a recent personal communication to me from a Board Member who knew at the time of the Vote that this information was withheld, the Board Member stated, “I also realize that it was wrong not to have informed you and other Board Members about the situation before we acted on the Truck Rule, and at least given you the chance to decide for yourselves whether a delay was needed.” (Exhibit #10).

As a Board Member of the California Air Resources Board I realize that the State of California has vested in me the responsibility to review and vote on regulations that may have a significant impact on the economy and the health of the people of California. To

Ellen Peters
November 16, 2009
Page 3

execute my duties it is imperative that I be informed of all pertinent matters relating to regulations upon which I will be voting.

Based upon the foregoing facts documenting that key CARB personnel withheld pertinent information from the Board and the Public I believe the legitimacy of the Vote may be in question. The scientific validity of the Report is not the issue, but rather at issue is a fundamental violation of procedure. Failure to reveal this information to the Board prior to the vote not only casts doubt upon the legitimacy of the Truck Rule but also upon the legitimacy of CARB itself.

As legal counsel for the Board and in view of your wisdom, experience and knowledge, I seek your opinion on this matter. Not taking action seems unacceptable in light of what appears to be a violation of procedure with both ethical and perhaps legal implications. How we handle this challenge will reflect on the future credibility of CARB. I believe that CARB needs to seize the initiative and take steps to protect and preserve the integrity of CARB, its Board Members and the decision making process.

I await your response.

Sincerely,

John G. Telles, M.D., Board Member
California Air Resources Board

Cc: California Air Resource Board Members

Statement of Fact Exhibits

- Exhibit # 1 Notice of Adverse Action Dated April 9, 2009
- Exhibit # 2 Proposed Regulation For In-Use On-Road Diesel Vehicles, October 2008
- Exhibit # 3 Letter to Governor Schwarzenegger from Dr. Stanley Young, July 7, 2008
- Exhibit # 4 Assignment to Draft response by Individual
- Exhibit # 5 Letter to Dr. Stanly Young from Secretary Adams, November 4, 2008
- Exhibit #6 Communication from Dr. Stanly Young, November 2008
- Exhibit #7 Communication from Chief Research Division, December 8,2008
- Exhibit #8 Communication from James E. Enstrom, Ph.D., October 28, 2008
- Exhibit #9 Communication from Chief of Research Division, December 11 2008
- Exhibit #10 Personal communication from Board Member
- Exhibit #11 Minutes to Board Meeting, September 9, 2009.

Need exhibit #

NOTICE OF ADVERSE ACTION

Hien T. Tran
Air Pollution Specialist
California Air Resources Board
1001 I Street, Sacramento, CA 95812

XXX-XX-0295

You are hereby notified that, pursuant to Government Code Section 19574, adverse action is being taken against you as follows:

I

NATURE OF THE ADVERSE ACTION

You are hereby suspended in your position as an Air Pollution Specialist (APS) position with the California Air Resources Board for a period of sixty days.

II

EFFECTIVE DATE

This suspension shall be effective start of business April 22, 2009 and shall end at the close of business on June 19, 2009.

III

STATEMENT OF CAUSES

This action is taken against you for reasons relating to Government Code section 19572:

- (a) Fraud in Securing Employment
- (f) Dishonesty.
- (t) Other failure of good behavior either during or outside of duty hours which is such a nature that it causes discredit to the appointing authority or the person's employment.

Exhibit #1

IV

STATEMENT OF FACTS

The general qualifications required for all employees in the state civil service include honesty, integrity, and good judgment. You have failed to demonstrate these qualifications in your position as an Air Resources Supervisor I. Your dishonesty regarding your education has called into question the validity of the report "Methodology for Estimating Premature Deaths Associated with Long-term Exposure to Fine Airborne Particulate Matter in California," in which you were the project coordinator and lead author. This report in turn supports other controversial and critical regulations adopted by Air Resources Board (ARB). Your actions could create a long lasting and damaging reflection on ARB and the California Environmental Protection Agency.

1. In February 2003, you joined the ARB Research Division's Health and Ecosystems Assessment Section, as an Air Pollution Specialist (APS). On the application for this APS position, dated December 23, 2002, you listed an expected Ph.D. from UC Davis. (Exhibit #1)
2. On or about July 18, 2007, you submitted a signed STD 678 State of California Examination and/or Employment Application (Application) for the Air Resources Supervisor I (ARS1) position in the Health and Ecosystems Assessment Section of the Research Division. On the Application, you listed a Ph.D. in Statistics and indicated that it was completed from the University of California, Davis (UC Davis) in 2007. The Application contains a certification with the following statement:

I certify under penalty of perjury that the following information I have entered on this application is true and complete to the best of my knowledge. I further understand that any false, incomplete, or incorrect statements may result in my disqualification from the examination process or dismissal from employment with the State of California. I authorize the employers and educational institutions identified on this application to release any information they may have concerning my employment or education to the State of California. (Exhibit #2)

Because you had not actually completed the Ph.D. from UC Davis in 2007, by signing the application under penalty of perjury and certifying that the information contained on it was true, you consequently falsified your application and therefore misrepresented the facts regarding your education.

ARB did not discover until December 10, 2008, that you had received an on-line Ph.D. from Thornhill University on June 28, 2007 (Exhibit #4). The fact is that you obtained a Ph.D. from Thornhill University on June 28, 2007,

prior to signing and submitting your Application for the ARS 1 position and you did not include this information on your Application.

3. On or about August 10, 2007, you interviewed for the Air Resources Supervisor I position. During the interview you stated that you planned to submit two papers for publication and clarified either you had just submitted your dissertation for the Ph.D. or were in the process of submitting the Ph.D. dissertation to UC Davis (or words to that effect). (Exhibit #5, #6, and #7)
4. On September 10, 2007, you were appointed to the ARS1 position. Soon after, you told your supervisor, Linda Smith, Chief of the Health & Exposure Assessment Branch, that you had recently received your Ph.D. You also began using the Ph.D. title on two staff reports (Initial Statement of Reasons for proposed Rulemaking and Proposed Regulation for Dryage Trucks and Regulations to Reduce Emissions from Diesel Auxiliary Engines on Ocean-Going Vessels While AT-Berth at a California Port) (Exhibit, #8, #9), and on your business cards and e-mail signature (Exhibit #9a, & #9b).

Your Supervisor, Linda Smith, posted an announcement to all ARB Staff on the Air Resources Board Inside (ARB's intranet site). The posting, dated September 12, 2007, announced your appointment as manager in the Health and Ecosystem Assessment Section in the Research Division and stated you recently earned a Ph.D. in Statistics from UC Davis (Exhibit #10). Because you told your supervisor that you had recently earned your Ph.D., she logically assumed that the degree was from UC Davis. In addition, that was the information listed on your application and what was discussed at the hiring interview. Once your appointment was posted, you made no attempt to correct the misinformation.

5. On or about September 5, 2008, you were assigned to draft a response letter for Cal/EPA Secretary Linda Adams' signature to Stanley Young of the National Institute of Statistical Sciences (Exhibit #11). Mr. Young stated in a letter to Governor Schwarzenegger dated July 7, 2008 (Exhibit #12), that none of the authors of the draft "Methodology for Estimating Premature Deaths Associated with Long-term Exposure to Fine Airborne Particulate Matter in California," in which you were the project coordinator and lead author, are professional statisticians. (Exhibit #13)

The draft response that you prepared for ARB's Agency Secretary to sign dealt, among other things, directly with the issue of the professional background of the authors of the report including yourself. Specifically, the final reply letter signed by Secretary Adams stated that you, as the lead author and project coordinator, held a doctorate degree in statistics from UC Davis (Exhibit #14). The Assignment Tracking Form for the draft reflects your initials dated September 9, 2008, when you first drafted the response and again September 10, 2008, when you revised it for review by Research Division Chief, Bart Croes (Exhibit #11). The final letter indicates that you

received a blind carbon copy. At no time did you correct the inaccuracy of your degree contained in the final letter.

6. Dr. James Enstrom, along with Dr. Anthony Fucaloro, Dr. Matthew A. Malkan, and Dr. Robert F. Phalen, placed into the Regulation record on December 3, 2008, a request to postpone and reassess California Air Resources Board Diesel Regulations (Exhibit #16). Specifically, Dr. Enstrom's comments list his concerns regarding the final October 24, 2008, CARB Staff Report "Methodology for Estimating Premature Deaths Associated with Long-term Exposure to Fine-Airborne Particulate Matter in California" (PM2.5 Mortality Report) in that the authors have no relevant peer reviewed publications and lead author (Hien Tran) has misrepresented his Ph.D. (Exhibit #17). Since you were the lead author and project coordinator of this report which was used to support the Regulation, your lack of credibility has called into question the credibility of the entire Regulation.
7. On Friday, December 5, 2008, Bart Croes, ARB's Research Division Chief (Chief) was informed by James Goldstene, ARB's Executive Officer, that Professor James Enstrom, an epidemiologist with the Jonsson Comprehensive Cancer Center at UCLA, had raised an issue regarding the validity of your Ph.D. in a briefing for Board Member John Balmes on the proposed In-Use On-Road Diesel Vehicles Regulation (herein after Regulation) (a.k.a. Statewide Truck and Bus Regulations). (Exhibit #15) The proposed Regulation is a regulation to help reduce emissions of diesel particulate matter, other criteria pollutants, and greenhouse gases from in-use heavy-duty diesel-fueled vehicles. Because the implications of the Regulation place additional requirements on truck and bus companies, it is critical that the research behind the regulation is considered valid.
8. On Monday morning, December 8, 2008, the Chief left a voicemail for you to call him while you were attending an off-site management training session. In addition, the Chief did some internet searching to try and find your Ph.D. from UC Davis, but was unsuccessful. You later e-mailed the Chief and stated you had called the person in charge of the alumni web page at UC Davis to have the information updated and you were told it should be ready in one or two days. The Chief replied with an e-mail asking for a paper copy of your Ph.D. degree or a signed thesis page. You responded by saying you would make some phone calls and get back to him the next day, after which he requested that you call him the following morning (or words to that effect). (Exhibit #18)

You continued to avoid telling the Chief the truth concerning your lack of a Ph.D. from UC Davis by indicating you were still working on getting the verification documentation he was requesting from UC Davis, perpetuating the deception.

9. On December 10, 2008, you called the Chief and requested to meet with him in the late afternoon, after your training class. At that time, you admitted that you did not have a Ph.D. from UC Davis, but rather an on-line Ph.D. in Applied Statistics from Thornhill University, dated June 28, 2007, or words to that effect. In addition, you stated that you received the certificate from Thornhill University after listing your accomplishments and paying a \$1,000 fee (or words to that effect).

You later provided a copy of this on-line degree to the division (Exhibit #4). A review of the Council for Higher Education Accreditation (CHEA) website of the listing of colleges and universities revealed that Thornhill University is not accredited by CHEA (Exhibit #20). In addition, you stated that while you had obtained your Master's Degree in Statistics from UC Davis, passed the Ph.D. qualifiers, and had some publications with your advisor, you had not worked on your Ph.D. for the past year because you were unable to satisfy the requirements for a break through in some theoretical aspects of statistics or words to that effect.

10. On or about December 10, 2008, in a comment letter for the Regulation, James Enstrom, a UCLA Professor, submitted a seven page analysis to ARB titled "Scientific Reasons to Postpone Adoption of Proposed STATEWIDE TRUCK AND BUS REGULATIONS." Specifically, he called into question your credentials. Mr. Enstrom stated that he searched and found no evidence of a Ph.D. in Statistics from UC Davis or any dissertation on any subject from any university for you or words to that effect. He stated this issue has direct relevance to the honesty of Tran and the scientific integrity of the draft and final reports on which you were the lead author or words to that effect. (Exhibit#21)

In an internal response, titled "ARB Staff Response on Scientific Integrity of the Report on the Relationship between Diesel Soot and Premature Death in California," dated December 19, 2008, ARB stated they stood by the data and conclusions contained in the PM 2.5 Mortality Report supporting the Regulation" due to the rigorous internal as well as external peer review that was done. (Exhibit #22)

ARB firmly stands behind the integrity of our report, having gone through an independent peer review, with all reviewers finding our methodology scientifically sound and reasonable. However, because the report provides input into the Regulation, which in turn results in increased regulations to the trucking industry (whose affects are far reaching), the credibility of the lead author and project coordinator is paramount. Due to your misrepresentation of your Ph.D., management was led to believe that you had attained your Ph.D. from UC Davis. Consequently, when your credentials were called into question, ARB was placed in an untenable position to defend your credentials with inaccurate information.

11. On December 11, 2008, Professor Samanlego from UC Davis called the Chief back and confirmed your Master's degree and that you had also passed the quallifiers for the Ph.D. He also stated that he had published a paper with you as well as you had worked on some presentations together. Furthermore, although he still considered you an active student, he could not recall the last time he had seen you, but that it had been at least a couple of years, or words to that effect. On December 12, 2008, a follow up letter was sent from the UC Davis Graduate Programs Coordinator confirming you advanced to Ph.D. candidacy in 1998 but that you did not complete the doctoral dissertation. (Exhibit #23)

12. Beginning on or about December 17, 2008, ARB's Office of Communication received numerous contacts from the media as described below. The Director of the Office of Communication (Director) Leo Kay was contacted by Chris Reed, Editorial Writer of the San Diego Union Tribune on December 18 & 19, 2008, regarding Dr. Enstrom's comments that an ARB Research Division Supervisor (Hien Tran) who worked on the report falsified claims that he had a Ph.D. from UC Davis and asked what ARB was planning to do about it (Exhibit #24). On December 18, 2008, Dr. Enstrom's comments were posted on SignONSanDiego.com, a blog site on San Diego's Union Tribune in an article titled "Breaking News: Air Board Investigating Whether Scientist on Diesel Regs Lied About His Ph.D." (Exhibit #25). An additional article was posted by Mr. Reed titled "CARB Ignored Well-Credentialed Experts on Diesel Regs, Too—and Its Own Expert May Have a Scandal of His Own" (Exhibit #26). On January 6 & 20, 2009, the Director received additional e-mails from Mr. Reed inquiring about the investigation into your Ph.D. from UC Davis. Subsequently he posted an article titled "Nichols Acknowledges Deception Affects 'Credibility' of Air Board—but Won't Say What She's Doing about It" on January 21, 2009 (Exhibits #27 & #28).

On February 3, 2009, ARB's Deputy Ombudsman, Phil Loder, received a call from Mr. Anthony Fucaloro inquiring about your academic qualifications. Mr. Fucaloro was one of the individuals that placed into the Regulation record on December 3, 2008, a request to postpone and reassess California Air Resources Board Diesel Regulations (Exhibit #29). In addition, on February 12 & 13, 2009, Mr. Reed contacted the Director again for an update on the investigation and to ask whether your work has been double-checked. Then on February 12, 2009, he posted an article titled "Deceptive Scientist Still Has Job at Air Board, Which Still Stonewalls on the Scandal" (Exhibits #30 & #31).

On March 11 & 13, 2009, Mr. Reed made several inquiries in response to the Director notifying him that you do not have a Ph.D. in Statistics from UC Davis but rather one from Thornhill University (Exhibit #32). Then on March 14, 2009, a blog titled "Air Board's Shame" released this information and referred to Thornhill University as a "distant learning" diploma mill and again

questioned the scientific integrity of the PM 2.5 Mortality Report in which you were the lead author, or words to that effect (Exhibit #33).

On March 9, 2009, the Director was contacted by a Lois Henry, an editor at the Bakersfield Californian to inquire about ARB's peer review process. During the following week the Director spoke with and emailed this editor more than a dozen times. On March 15, 2009, she posted an article titled "Dodgy Science Strangles Industry" on the paper's blog site. It stated that "CARB's lead researcher, Hien Tran, who wrote the report on which diesel rules are based lied about having a Ph.D. in Statistics from University of California, Davis" (Exhibit #34).

Because of your dishonesty, as the lead author on a critical report, titled "Methodology for Estimating Premature Deaths Associated with Long-term Exposure to Fine Airborne Particulate Matter in California," and the rules and regulations it directly affects, ARB's credibility has been called into question. Although ARB firmly stands behind both their methodology and the rigorous peer and scientific review process, your dishonesty has opened the door to unnecessary criticism due to the impact the rules and regulations have on a variety of industries.

13. On or about December 17, 2008, after meeting with the Chief concerning the issue of your Ph.D., and in particular the article on the web, you sent an e-mail stating you were leaning towards stepping down for the sake of the agency's reputation and admitted that this lapse in judgment was the biggest error you've ever made or words to that effect. (Exhibit #35)
14. On December 19, 2008, you submitted a voluntary resignation from your managerial position as an ARS1 under the condition that you could continue your employment in ARB's Research Division as an Air Pollution Specialist, Range C, a two-level demotion. In addition, in your resignation letter to your supervisor Linda Smith, you apologized for the current circumstances or words to that effect. (Exhibit #36)
15. On December 23, 2008, Sheryl Brooks, Chief of ARB's Human Resources Branch, sent a memo in response to your conditional resignation. In it she stated that she had accepted your voluntary demotion to an APS, Range C, however she also advised that pending further investigation, ARB may pursue further action up to and including dismissal. (Exhibit #37)

V

APPEAL RIGHTS

1. Right to respond to appointing power.

In accordance with the state Personnel Board 52.3 (Skelly Rule), you are entitled to at least five (5) working days within which to respond to this notice. You may respond orally or in writing to prior to April 22, 2009, which is the effective date of this action. If you wish to respond you may do so to:

Vicki Vandergriff
Deputy Director, Administrative Services Division
Department of Toxic Substance Control
Office Location: 1001 I Street, 21st Floor
Sacramento, 95812
Phone Number: (916) 327-1192

You are entitled to a reasonable amount of State time to prepare your response to the charges. You are not entitled to a formal hearing with examination of witnesses at this stage of the proceedings. However, you may be represented by another in presenting your response. The appointing power may sustain, amend, modify, or revoke the adverse action in whole or in part.

2. Right to Appeal to the State Personnel Board.

Regardless of whether you respond to these charges to the appointing power, you are advised that you have the right to file a written answer to this notice with the State Personnel Board, 801 Capitol Mall, Sacramento, California 95814, not later than thirty (30) calendar days after the effective date of this action. An answer shall be deemed to be a request for hearing or investigation as provided in Section 19575 of the Government Code. If you answer as provided, the Board or its authorized representative shall, within a reasonable time, hold a hearing and shall notify the parties of the time and place thereof. If you fail to answer within the time specified, the adverse action taken by the appointing power shall become final.

You are responsible for notifying the State Personnel Board and your appointing power of any changes in your address that occur after the effective date of this adverse action.

3. Right to Inspect Documents.

Copies of any documents or other materials giving rise to this adverse action are attached for your inspection. This documentation is not being provided to the State Personnel Board in advance of any appeal hearing which may be scheduled.

Dated: April 9, 2009

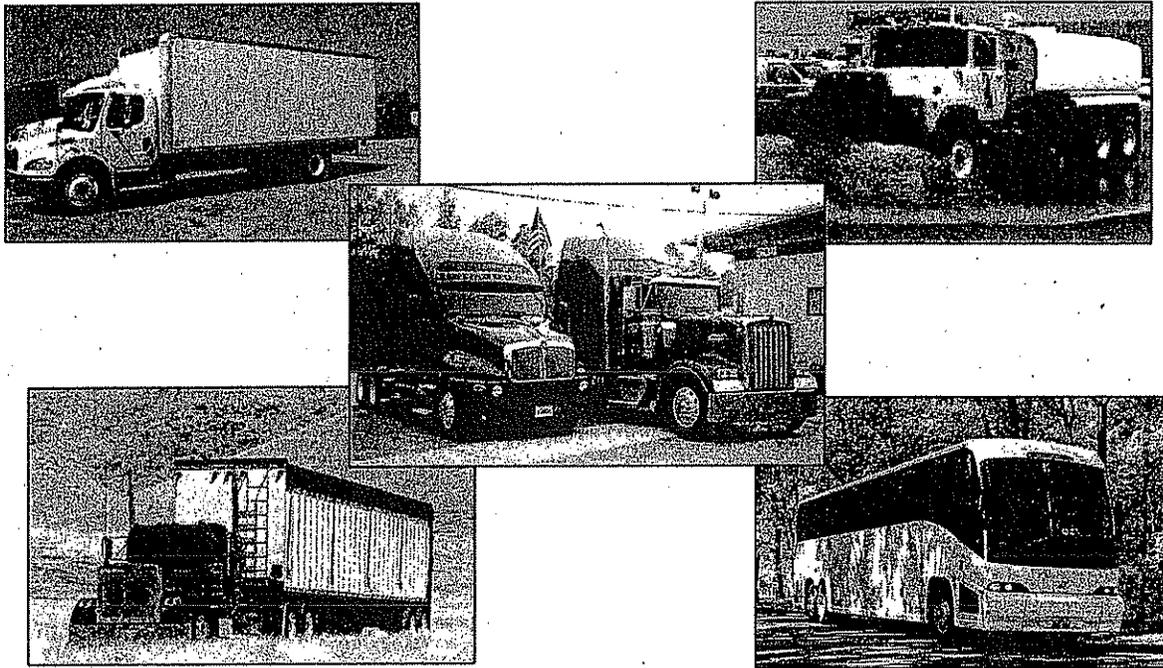


Linda Smith, Chief, Health & Exposure
Assessment Branch, Air Resources Board

California Environmental Protection Agency
AIR RESOURCES BOARD

**STAFF REPORT: INITIAL STATEMENT OF REASONS FOR PROPOSED
RULEMAKING**

PROPOSED REGULATION FOR IN-USE ON-ROAD DIESEL VEHICLES



Mobile Source Control Division
Heavy-Duty Diesel In-Use Strategies Branch

October 2008

Exhibit #2

NISS

National Institute of Statistical Sciences
PO Box 14006, Research Triangle Park, NC 27709-4006
Tel: 919.685.9300 FAX: 919.685.9310
www.niss.org

7 July 2008

Governor Arnold Schwarzenegger
State Capitol Building
Sacramento, CA 95814

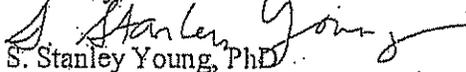
Dear Governor Schwarzenegger:

I am a statistician and I specialize in the analysis of complex data sets. A draft report from the Air Resources Board, Mary D. Nichols, Chairman, "Methodology for Estimating Premature Deaths Associated with Long-term Exposures to Fine Airborne Particulate Matter in California," has come to my attention. I note that none of the authors are professional statisticians. Some are trained in epidemiology. It is useful to know that the track record of epidemiologists in the use of statistics to make claims that are reproducible is very poor. Their claims fail to replicate 80-90% of the time, Ioannidis, JAMA, 2005. Their recommendations, most likely wrong, are projected to be very costly.

I suggest that you consider having the report vetted by professional statisticians for data quality, completeness of cited literature, an appropriate use of statistical methods. California is blessed with outstanding statisticians. One to consider is Professor David Freedman, UC Berkeley. He co-wrote a report on the use of statistics as evidence for the US Justice Department.

The analysis of observational environmental data is very complex. Given the importance of the recommendations, it would seem essential that skilled, professional statisticians using the best methods be employed for the analysis and interpretation of this body of data.

Sincerely,


S. Stanley Young, PhD

Assistant Director of Bioinformatics
National Institute of Statistical Sciences
Fellow, American Statistical Association

Exhibit #3

DIRECTIONS:

1. Anyone can originate. Use for memos, letters, briefing papers, Board items, etc. Generally, not RSC items/contracts.
2. Have support staff log into Access database. Each person should initial, set date/time when distributed to next person.
3. Seek clarification on expected product. Some due dates are negotiable, but this needs to be done as early as possible.
4. Route completed assignments to appropriate manager or support staff. Support staff will close out the assignment.

Quality Field Studies & Admin Branch
 Climate Change Mitigation Branch
 Health & Exposure Assessment Branch
 Research & Economics Studies Branch

RD Assignment # 1595 Date Assigned 9/5/08
 EO Assignment # 14232

SECTION ASSIGNED:
 Administrative
 Air Quality and Climate Science Section
 Atmospheric Processes Research
 Climate Change Mitigation & Emissions Research
 Economic Studies
 Greenhouse Gas Reduction Strategy
 Greenhouse Gas Technology & Field Testing
 Health & Ecosystems Assessment
 Indoor Exposure Assessment
 Library
 Population Studies
 Research Planning & Climate Change Outreach

ASSIGNMENT TYPE:
 AAQS
 AB 32/Climate Change
 Administrative
 Atmospheric Deposition
 Benefit / Cost
 Board Item
 Contracts / RSC
 Children's Health
 Diesel
 Economic Impact Analysis
 Environmental Justice

ORIGINATED BY:
 RD - Croes
 RD - Corey
 RD - _____
 RD - _____
 Div - _____
 EO - Sal
 CO - _____
 AWEAU
 Cal/EPA
 Governor

ASSIGNMENT: Reply for - Sec Adams Sig.

Please prepare draft response for sec sig - Please do not use word "Recent" letter in opening paragraph as letter is over two months old

DATE DUE 9/10/08 To Division Chief 9/9/08 To Branch Chief _____ To Section Manager _____
 Staff Assigned To _____

SIGNATURE BLOCK Sawyer Witherspoon Scheible Croes Corey Other _____

Other Division/Agency Coordination _____ Final Signed _____ Released/Mailed _____

COMMENTS / INSTRUCTIONS:
Concerns regarding a draft report from ARB "Methodology for Estimating Premature deaths Associated w/ long-term exposures to Fine Airborne Particulate Matter in CA"

File Name & Path: _____

ROUTING							Distribute To	Comments
Date	Time	Initial	Proofed	Revised	Approved			
9/5	10:30	VF				Hien	please respond.	
9/9	11:30	H				LTS	Pls review my draft response	
9/9	4:40	AS				AT	for revision	
9/10	4:10	H				BPEC	For your review.	
9/15	noon	BL				VF	Good letter! Please submit.	

Exhibit # 4



CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY



1001 I STREET, SACRAMENTO, CALIFORNIA 95814 • P.O. BOX 2815, SACRAMENTO, CALIFORNIA 95812-2815
(916) 323-2514 • (916) 324-0908 FAX • WWW.CALEPA.CA.GOV

LINDA S. ADAMS
SECRETARY FOR
ENVIRONMENTAL PROTECTION

ARNOLD SCHWARZENEGGER
GOVERNOR

November 4, 2008

S. Stanley Young, PhD
Assistant Director of Bioinformatics
National Institute of Statistical Sciences
Post Office Box 14006
Research Triangle Park, North Carolina 27709-4006

Dear Dr. Young:

Thank you for your letter to Governor Schwarzenegger regarding the May 22, 2008, draft report "Methodology for Estimating Premature Deaths Associated with Long-Term Exposures to Fine Airborne Particulate Matter in California" from the California Air Resources Board (CARB). Governor Schwarzenegger asked that I respond to your specific concerns and describe both the qualifications of the authors and the review process for the report.

Regarding the professional background of the authors, the lead author and project coordinator, Hien Tran, holds a doctorate degree in statistics from the University of California at Davis, and he has fourteen years of experience in advanced analysis of complex air quality data sets and methods for quantifying health impacts associated with exposure to air pollution. In 2006, his work on the health benefits of reducing tropospheric ozone levels in California was published in the Journal of Air and Waste Management Association (JAWMA 2006 56:1007-1021). In addition, the contributing authors hold advanced degrees in fields including toxicology, biology, atmospheric chemistry, physical chemistry, and mathematics.

As part of the review process, three scientific advisors have thoroughly reviewed and approved the CARB report. These individuals are well-known epidemiologists in the field of air pollution and public health: Professor Jonathan I. Levy of Harvard University, Professor Clive Arden Pope of Brigham Young University, and Dr. Bart Ostro of the Office of Environmental Health Hazard Assessment. These advisors are highly experienced in analyzing epidemiologic studies on the health effects of air pollution. They use advanced statistical techniques in conducting their own studies and make significant contributions to numerous peer-reviewed journals such as Environmental Health Perspectives, Epidemiology, the Journal of the American Medical Association, the Journal of the Air and Waste Management Association, Lancet, and Toxicology. Professor Levy has published

AIR RESOURCES BOARD • DEPARTMENT OF PESTICIDE REGULATION • DEPARTMENT OF TOXIC SUBSTANCES CONTROL
INTEGRATED WASTE MANAGEMENT BOARD • OFFICE OF ENVIRONMENTAL HEALTH HAZARD ASSESSMENT
STATE WATER RESOURCES CONTROL BOARD • REGIONAL WATER QUALITY CONTROL BOARDS

♻️ Printed on Recycled Paper

Exhibit #5

CARB CPRA 2009-11-23b000016

S. Stanley Young, PhD
November 4, 2008
Page 2

more than 30 articles from 2002 to 2008, Professor Pope has published over 50 articles (1983-2007, with several more in review), and Dr. Ostro has published more than 20 articles from 1980 to 2008. In short, they are well-respected by their peers in the scientific community.

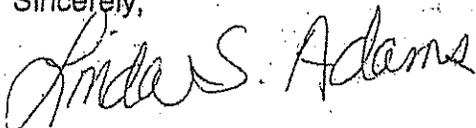
The draft report subsequently underwent an external peer review, utilizing California Environmental Protection Agency's (Cal/EPA) process that ensures a completely independent review of proposed rules and other documents. First, reviewer candidates were independently identified by the University of California at Berkeley, Institute of the Environment, in consultation with University of California (UC) colleagues. Each candidate was required to complete a Conflict of Interest Disclosure form, which was reviewed by the Cal/EPA Project Director for the independent peer review. Candidates were accepted as reviewers only if the disclosure information showed they had no conflict of interest related to the report.

The six reviewers identified by UC Berkeley and selected by the Cal/EPA Project Director to review the proposed methodology in the report are: Dr. Jeff Brook from Environment Canada, Professor Mark D. Eisner of UC San Francisco, Professor Richard C. Flagan of the California Institute of Technology, Professor Alan Hubbard of UC Berkeley, Professor Joel Kaufman of the University of Washington, and Professor Joel Schwartz of Harvard University. Collectively, their expertise is based on research in the areas of chronic obstructive pulmonary disease related to air pollution, statistical analysis of epidemiological data, particle formation and measurements in air, air quality risk management, air pollution and daily mortality associations, and epidemiology. These reviewers evaluated whether CARB staff correctly interpreted the results published in the scientific literature, and whether staff has correctly developed methods for estimating premature deaths associated with public exposure to ambient particulate matter. The peer reviewers provided written comments, which staff addressed and incorporated into the draft report that was released on May 22, 2008, for public comment.

As you can see, this report has benefited from the outstanding qualifications and experience embodied in the authors, the advisors, and the independent peer reviewers. It should be without doubt that the report has made correct use of statistical tools and sound scientific judgment to arrive at the conclusions.

Should you have further questions on this regard, please feel free to contact Bart E. Croes, P.E., Chief, Research Division, California Air Resources Board, at bcroes@arb.ca.gov or (916) 323-4519.

Sincerely,



Linda S. Adams
Secretary for Environmental Protection

cc: Bart E. Croes, P.E.
Chief, Research Division
Air Resources Board

ReviewersPeople

CALEPA

Jeffrey Brook
Environment Canada
4905 Dufferin Street
Downsview, Ontario M3H 5T4
Canada. Phone:
Email: jeff.brook@ec.gc.ca

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415-476-7351

Richard C. Flagan
Executive Officer of Chemical Engineering
Irma and Ross McCollum-William H. Corcoran Professor of Chemical Engineering and
Professor of Environmental Science & Engineering
*B.S.E., Mechanical Engineering, University of Michigan, 1969; S.M. and Ph.D.,
Massachusetts Institute of Technology, 1971, 1973*
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flagan@cheme.caltech.edu

Alan Hubbard
Assistant Professor of Biostatistics

School of Public Health
University of California, Berkeley
101 Haviland Hall, MC 7358
Berkeley, CA 94720

PHONE: 510-643-6160
FAX: 510-643-5163
OFFICE: 113B Haviland
EMAIL: hubbard@stat.berkeley.edu

S. Stanley Young, PhD
November 4, 2008
Page 3

bcc: Linda Smith, RD
Hien Tran, RD

X:\\! RD - Current Staff\\HienTran\\Draft response to NISS on PM mortality report authors' qualifications 2008-09-10
ht.doc

Subj: **Re: From a California Air Resources Board member in regards to letter Governor**
Date: 11/9/2009 1:38:06 P.M. Pacific Standard Time
From: young@niss.org
To: johngt103@aol.com

Dr. Telles: Let me know if you have questions or where I might help. Stan

> Thank you for your prompt reply. I will see what we can do about this
> and get back to you.
>
> J Telles
>
> Sent from my iPhone
>
> On Nov 9, 2009, at 5:32 AM, young@niss.org wrote:
>
>> Dear Dr. Teller:
>>
>> Thank you for making your concerns known to me.
>>
>> I questioned the report as the reasoning appeared too flawed to be
>> done by
>> a capable statistician. Many of the arguments used are highly
>> statistical
>> so having good statistical talent seems essential. Fortunately,
>> there are
>> very good statisticians in California that could be called in.
>>
>> I did correspond a bit with Mr. Tran and asked if he and scientists at
>> CARB had access to the raw data used in papers they relied upon. He
>> replied that the papers were peer reviewed and that, no, they did
>> not have
>> access to the data. My experience with the analysis of observational
>> studies is that most often the analysis given in the paper can not be
>> relied upon. (I can support this statement in the medical area and I'm
>> reasonably sure the statement holds for the environmental area.) My
>> institute, www.niss.org, examined data used in an environmental
>> observational study in 1995 (work done for the EPA) and the original
>> claims were not supported. Others have reported similar experiences
>> to me.
>>
>> A long way around, but Yes the report should be redone. Where
>> possible,
>> key original data should be obtained and re-analyzed. The process
>> should
>> be as transparent as possible with data being made public. Serious
>> scientists outside the environmental area should be involved, MDs,
>> physics,
>> statistics, etc.
>>
>> I am not an economists, but the economic analysis used by CARB seemed
>> superficial. I think you made the point, access to good medical help
>> requires money and if a person is without a job, they will suffer.
>>
>> Etc.
>>
>> I'm happy to answer questions or talk on the phone. I'm traveling
>> Mon and
>> Tues, but should be mostly available after that.

Exhibit #6

>>
>> I was never sent a correction letter. I did learn that Mr. Tran did
>> not
>> have a PhD in statistics from UC Davis. They have a fine statistics
>> department.
>>
>> Stan Young
>> Assistant Director of Bioinformatics
>> National Institute of Statistical Sciences
>> 919 685 9328
>> Home 919 782 2759
>> Cell 919 219 2030
>>
>>
>>> Dear Dr. Young,
>>>
>>> I am a Board Member of the California Air Resources Board that is
>>> worried
>>> about the scientific integrity of the the report "Methodology for
>>> Estimating Premature Deaths Associated with Long Term Exposure PM
>>> 2.5." In your
>>> letter or July 7, 2008 to Governor Schwarzenegger you questioned
>>> whether
>>> or not any of the authors of this report were professional
>>> statisticians.
>>> On November 4, 2008 you received an answer to your letter signed
>>> by the
>>> California State Secretary for Environmental Protection that the
>>> lead
>>> author
>>> and project coordinator holds a doctorate degree in statistics
>>> from the
>>> University of California at Davis. Since that time it has been
>>> discovered that
>>> this gentleman misrepresented his credentials and does not hold
>>> such a
>>> degree. In light of this fact the staff of the California Air
>>> Resources
>>> Board
>>> has contacted the report's scientific advisors and peer
>>> reviewers. In
>>> general, all of these advisors and reviewers feel that the
>>> methodology
>>> was
>>> reasonably sound. In your opinion do you think this report should
>>> be
>>> submitted to other review? Were you ever sent a correction to the
>>> November 4
>>> letter? I thank you for your concern shown in regards to this
>>> important
>>> report.
>>>
>>>
>>> Sincerely,
>>>
>>> John G. Telles MD
>>> Board Member
>>> California Air Resources Board
>>>
>

Subject: Re: Links

From: Bart Croes <bcroes@arb.ca.gov>

Date: Tue, 09 Dec 2008 21:25:59 -0800

To: "Tran, Hien@ARB" <htran@arb.ca.gov>

BCC: Linda Tombras Smith <lsmith@arb.ca.gov>

Thanks, Hien. Please call me at 798-9540 in the morning. I'd like to know how to best deal with this before the Board hearing.

Tran, Hien@ARB wrote:

Bart,
I'll need to make some phone calls and get back to you tomorrow.
Thanks.
--Hien

-----Original Message-----

From: Bart Croes [mailto:bcroes@arb.ca.gov]
Sent: Mon 12/8/2008 8:43 PM
To: Tran, Hien@ARB
Subject: Re: Links

Thanks, Hien. Please let me know when it is up so I can send the link to John. Do you have a paper copy of the degree or signed thesis page? I couldn't find your thesis on the UC Davis Library page. Has it been submitted? Sorry again about this bother!

Bart

Tran, Hien@ARB wrote:

>
> Bart,
> It's all right. I've called the person in charge of the alumni web
> page to have the info updated. She said it should be ready in 1 or 2
> days.
> --Hien

> -----Original Message-----

> From: Bart Croes [mailto:bcroes@arb.ca.gov]
> Sent: Mon 12/8/2008 5:15 PM
> To: Tran, Hien@ARB
> Subject: Links

>
> Hi Hien -- Sorry that you have to go through this, and it shouldn't
> matter to Enstrom whether or not you have a PhD, but I'd like to respond
> to John Balmes. The UC Davis graduates in stats are listed at
> <http://www.stat.ucdavis.edu/people/alumni-info> and Francisco Samaniego's
> CV is here <<http://www.stat.ucdavis.edu/%7Esamanieg/>>.

> Thanks, Bart.
>

Bart E. Croes, P.E. <bcroes@arb.ca.gov>

Chief

Research Division

California Air Resources Board

Exhibit #7

Subj: **Loveridge, Riordan, and Balmes Informed of Tran "Ph.D."**
 Date: 10/28/2009 12:32:15 P.M. Pacific Standard Time
 From: jenstrom@ucla.edu
 To: JohnGT103@aol.com

Dear Dr. Telles,

Thank you very much for investigating Hien Tran's "Ph.D." and problems with CARB diesel science. CARB members Loveridge, Riordan, and Balmes were informed of problems with Tran's credentials well before December 12. Please read the email messages below which describe the meetings that were set up with members Loveridge, Riordan, and Balmes. On December 3, 2008 at 3 PM, UC Irvine Professor Robert F. Phalen, UCLA Professor Matthew A. Malkan, and CMC Professor Anthony Fucaloro and I met for 30 minutes with Mayor Ronald Loveridge at his Riverside office and presented him with the December 3, 2008 Enstrom-Fucaloro-Malkan-Phalen "Request to Postpone and Reassess CARB Diesel Regulations." The seventh item on this Request dealt with Tran and his "Ph.D." Then on December 3, 2008 at 3:45 PM the four of us discussed our Request with Barbara Riordan for 30 minutes via a teleconference arranged by Mayor Loveridge's staff. Then on December 4, 2008 at 4 PM Professor Phalen and I discussed our Request with UCSF Professor Balmes for 30 minutes via a teleconference from my UCLA office. Finally, on December 8, 2008 I send our Request and other supporting documentation to Professor Balmes via UPS (see the attached UPS record that sent to you previously). To reiterate, CARB members Loveridge, Riordan, and Balmes were clearly and directly informed on December 3 and 4 of serious problems with "Dr." Tran and CARB diesel science by four California professors with a combined total of 130 years of relevant scientific experience.

The December 3, 2008 "Request to Postpone and Reassess CARB Diesel Regulations" was formally submitted as a public comment to CARB on December 10, 2008 at 11:47:54 AM (http://www.arb.ca.gov/lispub/comm/bccomdisp.php?listname=truckbus08&comment_num=902&virt_num=418). My detailed seven-page December 10, 2008 document "Scientific Reasons to Postpone Adoption of Proposed STATEWIDE TRUCK REGULATIONS," which discusses the Tran "Ph.D." in detail on pages 1 and 2, was formally submitted to CARB on December 10, 2008 at 11:41:30 AM (http://www.arb.ca.gov/lispub/comm/bccomdisp.php?listname=truckbus08&comment_num=897&virt_num=413). Copies of both submission notices are shown below and can be found among all public comments regarding the on-road diesel vehicle regulations (<http://www.arb.ca.gov/lispub/comm/bccommlog.php?listname=truckbus08>). Furthermore, I was told by a CARB staff member that a printed copy of these public comments would be given to all CARB members, including you, before the December 12 vote on the on-road diesel vehicle regulations.

Please call me if you would like to personally discuss this matter. If helpful, I would be willing to meet with you in Fresno to review the many complex details contained in my December 10, 2008 comments to CARB.

Best regards,

James E. Enstrom, Ph.D., M.P.H.
 (310) 825-2048

Subject: RE: December 3 Meeting with Barbara Riordan
 Date: Mon, 1 Dec 2008 12:29:37 -0800
 From: "Frazier, Charlyn@ARB" <cfrazier@arb.ca.gov>
 To: "James E. Enstrom" <jenstrom@ucla.edu>

Exhibit # 8

Thanks for your message. Mrs. Riordan will also have ½ hour available for call at 3:45 on Dec. 3. I've also heard from Dr. Balmes and he has ½ hour available for a call on December 4 at 4:00 p.m. You can call him at (510) 643-4702.

Please confirm that this schedule of calls works with your schedule. Thanks.

Charlyn Frazier
Board Member Liaison
Air Resources Board
(916) 327-6247

From: James E. Enstrom [<mailto:jenstrom@ucla.edu>]
Sent: Monday, December 01, 2008 12:12 PM
To: Frazier, Charlyn@ARB
Subject: RE: December 3 Meeting with Barbara Riordan

Dear Charlyn,

I appreciate the clarification regarding my December 3 meeting with Mayor Loveridge. I now plan to call Board Member Riordan at 3:45 PM on December 3, as originally scheduled. Please let me know how long I will be able to speak with her. Also, let me know if I can call Board Member John Balmes this week or can send him an email message.

Thank you very much for your assistance.

Best regards,

Jim Enstrom

At 11:44 AM 12/1/2008, you wrote:

Please be advised that Mayor Loveridge has ½ hour available on December 3 at 3P for meeting with you. So 3:45 p.m. call with Board member Riordan should work for you. Please confirm that you will be calling Mrs. Riordan at 3:45 p.m. so I can reconfirm this time with her. Thanks.

Charlyn Frazier
Board Member Liaison
Air Resources Board
(916) 327-6247

From: James E. Enstrom [<mailto:jenstrom@ucla.edu>]
Sent: Wednesday, November 26, 2008 2:29 PM
To: Frazier, Charlyn@ARB
Subject: RE: December 3 Meeting with Barbara Riordan

Dear Charlyn,

Thank you very much for setting up the December 3 at 3:45 PM telephone appointment with CARB Member Riordan. However, I have a personal appointment in Riverside with CARB Member Loveridge on December 3 from 3 PM to 4 PM. Thus, I would like to call Member Riordan on December 3 at about 4 PM from my cell phone and speak for up to 30 minutes, if this is acceptable to her. Please confirm this time change.

Best regards,

Jim Enstrom
(310) 825-2048 UCLA
(310) 903-8639 cell

At 01:24 PM 11/26/2008, you wrote:

Professor Enstrom:

Following up on your request to meet with ARB Board Member Riordan, she is available for a call on December 3 at 3:45 p.m. Please call her at (909) 792-6190. If you get her answering machine, please leave your number and she will call you right back. She will be there and will get message.

Please confirm that this works for you.

Thank you.

Charlyn Frazier
Board Member Liaison Air Resources Board
(916) 327-6247

-----Original Message-----

From: James E. Enstrom [mailto:jenstrom@ucla.edu]
Sent: Friday, October 17, 2008 8:43 AM
To: Frazier, Charlyn@ARB
Subject: Request for Meeting with Ronald O. Loveridge

Charlyn Frazier
cfrazier@arb.ca.gov
(916) 327-6247

Dear Charlyn,

As per our conversation yesterday, I request a personal meeting in Riverside with CARB member Major Ronald O. Loveridge, as soon as it is convenient for him. As a 35-year epidemiologist at UCLA, I would like to discuss with him the epidemiologic evidence associating diesel particulate matter with mortality in California and its relationship to the pending CARB "truck rule." I am representing myself as a scientist and as a lifelong California who is extremely concerned about the scientific integrity of this "truck rule."

Thank you very much for your assistance.

Best regards,

James E. Enstrom, Ph.D., M.P.H.
Jonsson Comprehensive Cancer Center
University of California, Los Angeles
Los Angeles, CA 90095-1772
www.cancer.ucla.edu
jenstrom@ucla.edu
(310) 825-2048

CARB Comment Log Display

(http://www.arb.ca.gov/lispub/comm/bccomdisp.php?listname=truckbus08&comment_num=897&virt_num=413)

**Below is the comment you selected to display.
Comment 413 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45 Day.**

First Name: James
Last Name: Enstrom
Email Address: jenstrom@ucla.edu
Affiliation: University of California, Los Angeles

Subject: Scientific Reasons to Postpone STATEWIDE TRUCK REGULATIONS
Comment:

Please carefully consider my attachment "Scientific Reasons to Postpone Adoption of Proposed STATEWIDE TRUCK AND BUS REGULATIONS".
Thank you very much.

Attachment: www.arb.ca.gov/lists/truckbus08/897-carb_enstrom_comments_on_statewide_truck_regulations_121008.pdf

Original File Name: CARB Enstrom Comments on Statewide Truck Regulations 121008.pdf

Date and Time Comment Was Submitted: 2008-12-10 11:41:30

If you have any questions or comments please contact COTB at (916) 322-5594.

(http://www.arb.ca.gov/lispub/comm/bccomdisp.php?listname=truckbus08&comment_num=902&virt_num=418)

**Below is the comment you selected to display.
Comment 418 for Statewide Truck and Bus Regulation 2008 (truckbus08) - 45
Day.**

First Name: James
Last Name: Enstrom
Email Address: jenstrom@ucla.edu
Affiliation: University of California, Los Angeles

Subject: Request to Postpone CARB Diesel Regulations
Comment:

Please carefully consider the attached petition "REQUEST
TO
POSTPONE AND REASSESS CARB DIESEL REGULATIONS." Thank you
very
much.

Attachment: [www.arb.ca.gov/lists/truckbus08/902-
request_to_postpone_and_reassess_carb_diesel_regulations_120308.pdf](http://www.arb.ca.gov/lists/truckbus08/902-request_to_postpone_and_reassess_carb_diesel_regulations_120308.pdf)

Original File Name: Request to Postpone and Reassess CARB Diesel Regulations 120308.pdf

Date and Time Comment Was Submitted: 2008-12-10 11:47:54

If you have any questions or comments please contact COTB at (916) 322-5594.

At 09:42 PM 10/27/2009, you wrote:

Dr. Enstrom

Thank you for sending this info. I am investigating this matter. Did you send a comment to the regulation on December 3 2008 ? If so did you happen to notice if this comment was posted? If you have documentation that you sent a comment on Dec 3 please forward such documentation.

Thank you.

John Telles,

Also did you talk to any board members in person about Tran's credentials prior to the board meeting of Dec 10 2008?

In a message dated 10/20/2009 11:12:22 P.M. Pacific Daylight Time, jenstrom@ucla.edu writes:

Dear Dr. Telles,

Please read the October 21, 2009 Bakersfield Californian column below by Lois Henry "CARB Can't Ignore Credibility Problems". You are extensively quoted. Also, please read my attached UPS record and handwritten note describing damning evidence about Hien Tran and CARB diesel science that I send to CARB member John R. Balmes on December 8, 2008. Furthermore, UC Irvine Professor Robert F. Phalen and I spoke with UCSF Professor Balmes on December 4, 2008 at 4 PM for 30 minutes about the December 3, 2008 Enstrom-Fucaloro-Malkan-Phalen "Request to Postpone and Reassess CARB Diesel Regulations" (http://www.arb.ca.gov/lists/truckbus08/902-request_to_postpone_and_reassess_carb_diesel_regulations_120308.pdf) or (<http://www.scientificintegrityinstitute.org/CARBPC120308.pdf>). In addition, immediately following his June 4, 2008 confirmation hearing before the Senate Rules Committee in Sacramento, I spoke in person with Dr. Balmes about many of these same problems. Thus, for over 16 months Dr. Balmes has known about serious problems with CARB diesel science and the CARB Scientific Review Panel on Toxic Air Contaminants. As far as I can determine, he has failed to acknowledge or discuss these problems with other CARB members. By my ethical standards, this deception by Dr. Balmes has seriously damaged his credibility as an objective and honest CARB member.

Since you are the board member most concerned about the credibility of CARB, I would very much like to talk with you further about these issues.

Thank you very much for your consideration

Sincerely yours,

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

(310) 825-2048

<http://www.bakersfield.com/news/columnist/henry/x1260873480/LOIS-HENRY-CARB-cant-ignore-credibility-problems> .

LOIS HENRY: CARB can't ignore credibility problems

The Bakersfield Californian | Tuesday, Oct 20 2009 07:03 PM

Last Updated Tuesday, Oct 20 2009 07:03 PM

Subject: Enstrom and Hien Tran

From: Bart Croes <bcroes@arb.ca.gov>

Date: Thu, 11 Dec 2008 10:34:23 -0800

To: James Goldstene <jgoldste@arb.ca.gov>, Mike Scheible <mscheibl@arb.ca.gov>, John Balmes <john.balmes@ucsf.edu>, Tom Cackette <tcackett@arb.ca.gov>

CC: Linda Tombras Smith <lsmith@arb.ca.gov>, Erik White <ewhite@arb.ca.gov>, Bob Cross <rcross@arb.ca.gov>

James, John, Mike, Tom -- A head's up in case you're using your Blackberries, but we'll try to catch you at the lunch break.

Hien confessed last night that he does not have a PhD from UCD. He was in the program, passed his qualifiers, and has some pubs with his advisor, but hasn't worked on it for the past year. I'm trying to confirm with his advisor. Unfortunately, he's listed as holding a PhD as the lead author on the PM2.5 mortality report, and in a letter of response from Linda Adams to Stanley Young of the National Institute of Statistical Sciences in a letter last month

We learned this morning that James Enstrom is questioning the integrity of the PM2.5 report due to Hien in a comment letter on the truck rule. Linda's revising her Q+A to respond to this and other issues he's raised. We'll show you at noon as I would expect Enstrom to testify today or tomorrow.

Bart

Bart E. Croes, P.E. <bcroes@arb.ca.gov>

Chief

Research Division

California Air Resources Board

Exhibit #9

Subj: **Re: Thank you from J Telles**
Date: 11/10/2009 6:56:33 A.M. Pacific Standard Time
From: mnichols@arb.ca.gov
To: johngt103@aol.com

Dear John,

I did know, though I can't remember exactly when I was told. At the time I was told I recall thinking it was a very annoying distraction but not a fundamental problem for the truck rule, since Tran's work had been supervised and reviewed by others and he was not the source of any original research, but really just a compiler.

I think it was a mistake not to have informed you and the rest of the Board about this issue. At the time, I thought that Tran's voluntary demotion and removal from the project would be sufficient to insulate the rest of the ARB until we could proceed to disciplinary action and obtain a new review of the mortality report. Basically I was guilty of thinking that since I "knew" the underlying truth of the information we should not allow this stupid personnel problem to derail a critical rulemaking.

While the relentless criticism has been a distraction, frankly I think it is manageable. But as I reflect on our conversation, I also realize that it was wrong not to have informed you and other Board members about the situation before we acted on the truck rule, and at least given you the chance to decide for yourselves whether a delay was needed.

Tran's conduct was both illegal and unethical. I truly believe that the staff response was a matter of poor judgment, but not deceptive or irresponsible. In any case, I want to apologize to you personally for failing to convey information you were entitled to have.

Best regards,
Mary

From: JohnGT103@aol.com <JohnGT103@aol.com>
To: Nichols, Mary D. @ARB
Sent: Mon Nov 09 21:59:42 2009
Subject: Thank you from J Telles

Dear Mary,

Thank you for taking the time to listen to my concerns. It occurred to me after I hung up that it was not clear to me whether or not you knew prior to the December 12th Truck Rule vote that Hein Tran had misrepresented his PhD. Did the Staff inform you prior to the December 12th vote? If you were not informed, do you think that the Staff should have informed you and all Board members and the public prior to the Vote?

John T

Exhibit #16

Subj: **RE: The misrepresented PhD**
Date: 11/11/2009 6:39:04 A.M. Pacific Standard Time
From: jbalmes@medsfgh.ucsf.edu
To: JohnGT103@aol.com

Dear John:

Thanks for asking. As a newcomer to a policymaking role, I have tried to learn some lessons along the way since I was appointed to the Board. I have certainly learned from the Tran episode something that I should have already known, that transparency in policymaking is necessary.

When James Enstrom, an epidemiologist from the UCLA Cancer Center and an activist against regulation of diesel emissions, told me on a phone call sometime during Fall 2008 that Hien Tran did not have a PhD, I immediately e-mailed James Goldstene and Mary about this allegation.

I was not particularly worried about the content of the report Tran had written because I know the studies that were reviewed and feel that the evidence for a PM2.5-mortality association can speak for itself. Despite what some critics of CARB have said, the report is not a "study" presenting new data, nor even a formal meta-analysis of other studies. It is a distillation of exposure-response functions from multiple studies of the PM2.5-mortality association to come up with an overall PM2.5-mortality ERF to be used to support CARB policies.

The Tran report had been peer-reviewed by appropriately qualified scientists from outside of the agency who felt that the report's overall ERF was reasonable. I don't think that the Tran report is seriously flawed, although I went on record at the May or June 2008 meeting in Fresno when it was presented to the Board as saying something to the effect that while there is no doubt that the published data support a PM2.5-mortality association, there is a range of uncertainty about the slope of the exposure-response relationship, i.e., it depends on what studies one looks at.

Mary and James told me at the November or December 2008 Board meeting that their investigation had shown that Tran did not have a PhD; rather, he was a graduate student at UC Davis who had passed his qualifying exam, but not finished his dissertation. They told me that he would be subject to disciplinary action and that what that action would be was the subject of ongoing evaluation following state civil service rules.

Frankly, I don't think the Tran ERF is all that important to passing the truck rule. As I said above, I think the epidemiological data re: PM2.5 and health support controlling emissions from combustion sources, including diesel engines. Any independent review of the data will show the presence of associations with PM2.5 and health. The strength of the evidence has prompted the US EPA, the EU, and the WHO to promulgate increasingly strict air quality standards for PM2.5. The US EPA is currently considering a lower annual standard for PM2.5 because of the epidemiological evidence. If enacted the air quality of the SJV will be considered even more out of attainment than it already is.

I don't think the argument about whether CARB's new diesel emissions regulations are too tough should be about the science – I think the science is clear. To me, an appropriate discussion is about what level of regulation California society can afford during this time of economic recession.

That said, I think CARB leadership, including me (because I am a Board member who knew about the Tran PhD misrepresentation), should have handled the Tran report differently. Even though I don't think the Tran report is flawed, the credibility of the agency is jeopardized by the perception that the truck rule was based on a "study" conducted by an unqualified liar. In retrospect, I think that CARB should have withdrawn the Tran report and commissioned a new effort to develop an ERF. I now think that I should have pushed for such an action last Fall – this is the lesson that I have learned. When I discussed this with Mary recently, she told me she agrees that we should have a new independent review of the PM2.5-mortality ERF to replace the Tran report.

The US EPA is in the process of public review of a new Risk and Exposure Assessment for PM that uses an ERF that CARB could adapt. The WHO also has an expert panel working on developing an ERF to support the comparative risk assessment of the health impacts of outdoor air pollution as part of the update of their global burden of disease effort. The ERFs that come out of both of these efforts will support policies to control emissions of fine PM.

I did not vote for the truck rule based on the Tran report, but on what I know of the scientific evidence about the health effects of fine PM. However, I also support transparency in public policymaking and regret that information about Tran was not given to the Board at an earlier time.

I'm not entirely satisfied with this e-mail discussion so I'm happy to talk with you over the phone or in person.

Best,

JB

From: JohnGT103@aol.com [mailto:JohnGT103@aol.com]

Sent: Tuesday, November 10, 2009 9:26 PM

To: Balmes, John

Subject: The misrepresented PhD

Dear John,

From my review of "the misrepresented PhD" affair, it appears that you were informed before the Truck Rule vote that Hien Tran had misrepresented his PhD. If you had this knowledge before the Vote was there a reason that you did not make the whole board aware of this fact?

Sincerely

John T.

Board testimony on peer review process.

ARB 9-24-09.txt

19 Before I open it up to the Board, staff, I think
20 I'm going to let staff respond, because I think the
21 speakers are co-related.

22 EXECUTIVE OFFICER GOLDSTONE: First of all, I'll
23 ask Bart to talk about the research and the effort we put
24 into all the research we do in a general way and
25 specifically talk about the report in question, just about

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1 the peer review and process we went through on that.
2 RESEARCH DIVISION CHIEF CROES: Good morning.
3 I'll address two issues.
4 One is the peer review of the research itself.
5 So as you know, you have the legislatively required
6 Research Screening Committee, which consists of respected
7 academics from the University of California system, from
8 private colleges, and people from some funding
9 organizations like U.S. EPA, the South Coast AQMD, and the
10 Coordinating Research Council, which is the research arm
11 of the auto and oil industry. And basically this research
12 plan, every proposal has to go through this committee
13 before it can come to the Board. So this is an oversight
14 committee, not an advisory committee. If they reject the
15 research plan or the proposal, we would never be able to
16 take it to you. And they also review the final report.

Page 56

Exhibit # 11

14 Also we went through a formal peer review process
15 managed by the University of California Office of the
16 President. They brought in six peer reviewers from all
17 over the country that agreed with the results of the
18 report.

19 The diesel industry asked us to include a seventh
20 peer reviewer, Phil Hopkey from Clarks University. He
21 also agreed with the conclusions of the report.

22 And, again, I went back to these peer reviewers
23 about six months ago, and they're still in agreement with
24 the report.

25 In addition, Chairman Nichols asked us to reach

54

1 worldwide to academics and organizations to see if they
2 agreed with the reports. So we went to the World Health
3 Organization, Environment Canada, U.S. EPA, brought them
4 all to California either in person or on a telephone
5 conference, ~~went over the results of the report~~, and they
6 were in agreement.

7 Since our report's ~~come out~~, a group of European
8 researchers has basically come out with the same result.
9 Before we put our report out, U.S. EPA went through a
10 process with 12 academics that also came to the same
11 conclusions that we did. So we feel this has had a pretty

17 So we consider that a very strong peer review.

18 Also, we require all our research to go through a
19 formal peer review process with scientific journals. And
20 generally each project generates one to five research
21 publications.

22 The speakers also questioned the peer review of
23 this report that we put out in 2008 identifying the
24 relationship between exposure to PM2.5 and premature
25 death. The person that managed some aspects of the

53

1 project turned out to have falsely claimed that he had a
2 Ph.D. from an accredited college. And we had several
3 levels of peer review for that report. And after it was
4 discovered they falsified his Ph.D., we went back to this
5 peer review committee, gave them that information, and
6 asked if they had any changes in their review of the
7 report. And we had three academic advisors: Arden Pope
8 from Brigham Young University; Jonathan Levy from Harvard;
9 and Bart Ostro from our sister agency, OEHHA. And they
10 oversaw every aspect of Hein Tran's work of the entire
11 report. We relied on 78 peer review publications, and
12 they basically agreed with the -- basically it was their
13 recommendation that we brought to the Board.

14 Also we went through a formal peer review process
15 managed by the University of California Office of the
16 President. They brought in six peer reviewers from all
17 over the country that agreed with the results of the
18 report.

19 The diesel industry asked us to include a seventh
20 peer reviewer, Phil Hopkey from Clarks University. He
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22 And, again, I went back to these peer reviewers
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54

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4 all to California either in person or on a telephone
5 conference, went over the results of the report, and they
6 were in agreement.

7 Since our report's come out, a group of European
8 researchers has basically come out with the same result.
9 Before we put our report out, U.S. EPA went through a
10 process with 12 academics that also came to the same
11 conclusions that we did. So we feel this has had a pretty

12 rigorous peer review.

13 ACTING CHAIRPERSON RIORDAN: Thank you for that
14 response. Board members, let me -- Dr. Sperling.

15 BOARD MEMBER SPERLING: You know, I think it's
16 always healthy to be raising questions about quality of
17 research and access to information and review and so on.
18 But I have to say, you know, in the years I've observed
19 ARB, this is the most extraordinary agency I've ever seen
20 anywhere in terms of the transparency, in terms of the
21 technical competence of the staff, in terms of outreach
22 and workshops that are conducted. I'm just inundated in
23 my mailbox with workshops every day on all of these
24 topics -- and the amount of peer review that goes on in
25 all the publications.

55

1 So it's great that people are paying attention,
2 are concerned about these issues. And certainly we can
3 always, you know, do it better. But, you know, I have not
4 seen any government agency that does -- that manages the
5 technical parts and the review parts of these agendas
6 better than ARB. So I want to praise the staff for doing
7 such a good job.

8 ACTING CHAIRPERSON RIORDAN: Okay. Any other

<http://www.bakersfield.com/news/local/x618251275/Air-board-must-be-held-accountable>

The Bakersfield Californian October 10, 2010

LOIS HENRY: Air board must be held accountable

The Bakersfield Californian | Saturday, Oct 09 2010 09:49 PM

Last Updated Saturday, Oct 09 2010 10:07 PM

Here's a topic for the next governor's debate: If elected, would you investigate the California Air Resources Board for fraud?

Oh, did I say the "f" word?

Absolutely.

This agency is out of control and, I believe, has perpetrated an outright fraud on the people of this state.

And, no, I'm not just talking about how the agency was recently forced to admit it was wrong about the amount of diesel emissions that heavy construction contributes to air pollution.

(They were off by 340 percent and had even "overestimated" how much diesel fuel was being used per year, saying the industry used 1 billion gallons a year when it was closer to

250,000 gallons a year. The correct information was readily available through the Franchise Tax Board, by the way.)

Nor the fact that, per its own report on Aug. 31, the number of people who supposedly die prematurely due to exposure to PM2.5, tiny particulate matter such as dust and soot, inexplicably dropped from 18,000 to 9,200.

(In two CARB reports from 2006 and 2008, used to justify regulations of off-road construction equipment and on-road diesel trucks, premature deaths were pegged at 18,000. About 3,500 of those were supposedly due specifically to diesel PM2.5. CARB's Aug. 31 report claims the number of premature deaths is now 9,200 with no explanation for the decrease and no mention of the 3,500 supposed diesel PM2.5 deaths. Curious.)

And, though this is reason enough for a fraud investigation, I'm not referring to revelations that the man who wrote those 2006 and 2008 reports lied about his credentials.

(When that issue was brought to the attention of CARB board chairwoman Mary Nichols and at least three other board members, it was not shared with the full board until after a critical vote for draconian new rules limiting emissions from on-road truck emissions. Can you say coverup?)

And I'm not even using the "f" (fraud! Come on, this is a family paper!) word because more and more science is showing there is little to no evidence of premature deaths in California caused by exposure to PM2.5.

(Last February, Michael Jerrett a UC Berkeley scientist hired by CARB to look at California specifically, gave preliminary results showing zero effect of PM2.5 on all mortality. Oh, and that new CARB health report put out Aug. 31 relies on a 2009 national study that shows there is no mortality effect in California from these emissions.)

Incredibly, there's more.

Remember James Enstrom? He's the UCLA scientist who did a study in 2005 of older Californians that showed few if any premature deaths from PM2.5 exposure and tried to get someone, anyone's, attention over at CARB.

Not only was his study essentially thrown away, his employment at UCLA is now under threat. He's apparently in trouble for voicing concerns about CARB's recklessness. Well, while Enstrom's been waiting for the appeals of his dismissal to run their courses, he's done a little digging, specifically into the 2009 Health Effects Institute report that CARB and the Environmental Protection Agency used to gin up this new PM2.5 death toll of 9,200.

The study was actually an extended follow-up of a 2000 Health Effects Institute report looking at PM2.5's effects nationally. It was done by Daniel Krewski and co-authored by Jerrett, who's now doing the California-specific study for CARB, which Krewski is also working on, by the by.

At the urging of the California Dump Truck Owner's Association, Krewski did a separate analysis that teased out the California specific information from his 2009 Health Effects Institute follow-up study. Statistically, this analysis showed hardly any premature deaths from these particulates.

In a letter to CARB, Krewski warned that because so few areas in California were used (Fresno, San Francisco, San Jose and Los Angeles counties), the information was statistically limited.

Even so, Enstrom was curious about Krewski's information and delved more deeply into the numbers.

Using as much of Krewski's data and methodology as he could glean from the 2000 Health Effects Institute report, Enstrom ranked the areas that were monitored for levels of PM2.5 and assessed their relative risk for premature deaths.

Fresno ranked third lowest for levels of PM2.5. Hmmm. We're not even allowed to light fires on cold winter nights in the Central Valley for fear of the dreaded PM2.5. San Francisco and San Jose ranked eighth and ninth lowest, respectively, and Los Angeles was 39th out of the 49 areas originally monitored (in 2009 Krewski extended the study to include 116 cities).

When he assessed relative risk of premature death and averaged it for each geographic region, Enstrom found that California ranked well below the national average for risk. He double-checked his numbers using other studies, including Jerrett's preliminary results and two other independent studies, and found them consistent.

All of Entstrom's number-crunching also fits perfectly with a map in the original 2000 Krewski Health Effects Institute report, which showed levels of PM2.5 and mortality risk for the 49 areas across the U.S. Then using another Krewski chart showing PM2.5 and mortality risk, Enstrom ranked each area. In that ranking, Fresno is 2nd lowest in mortality risk and Los Angeles is fifth lowest of the 49 areas.

That compliments another study of Medicare enrollees in the western U.S., by Scott Zeger, 2008, that showed while Los Angeles is high in PM2.5, its total associated death rate is low.

"What this means is there absolutely is geographic variation in PM2.5 mortality risk and I think Krewski and Jerrett must have known this for at least the last 10 years," Enstrom said. "Instead of bringing it to someone's attention they've watched their work be used in ways that are unacceptable."

Not only by CARB. The EPA is about to lower the national standard for PM2.5 from 15 micrograms per cubic meter to 11.

"Which just makes no sense considering the obvious geographic variation," Enstrom said. "And it certainly makes no sense in California when there's no relationship between PM2.5 and premature death.

"It's a complete misrepresentation of the science."

And that's where I believe fraud comes into play.

Some people -- especially CARB's leadership -- must have known about this information for years. But these are the same people holding the state's regulatory reins. That means power.

And power, as we all know, is far more toxic than even the most deadly PM2.5.

Opinions expressed in this column are those of Lois Henry, not The Bakersfield Californian . Her column appears Wednesdays and Sundays. Comment at <http://www.bakersfield.com>, call her at (661) 395-7373 or e-mail lhenry@bakersfield.com.