11-2-4
Hank de Carbonel

Comments for the April 2011 Board Meeting regarding PM 2.5

04/27/11

CARB continues to use reports, studies and science from select and questionable sources. Even when problems and shortcomings with the data are revealed.

The conclusions that are acceptable to the Board come from a pool of reliable sources. The reliable sources would appear to have a vested interest due to funding and grants received from the Board. Funding goes to pay for studies etc and studies conclude the desired results of the Board. Thus once revered institutions become sullied.

Even the selection of the subjects and studies and who will do them is conflicted. The panels and experts are not appointed as per the policies and procedures governing the operation of Air Resources Board. The stagnation that comes from long held positions may lead to poor practices and skewed awards. Cronyism replaces clarity and transparency.

The refusal to respond to violations of the spirit as well as the intent of AB 32 leads us to a body without public trust and without respect in the scientific community. The California Air Resources Board lives in a closed atmosphere and suffers from a lack of fresh air and clear thinking. It is a closed loop of self-inspection and self-reflection. That is not good governance nor good science.

A board that is supposed to be driven by science must show a basic understanding of the foundations of science. Arithmetic would be the start of that foundation. The Board has repeatedly shown an inability to perform accurately simple percentages and subtraction as well as addition.

The data and studies used in the March 29 2011 report are dated, flawed and are not site specific for California Much of the information and justification comes from data acquired in 1993 and 1995. We have been promised a current site-specific report for over a year. The board has not delivered this report despite repeated request and repeated commitments from the board to release this report.

In the last few days we have gotten reports regarding new science suggesting that CARB has failed to accomplish their mandate regarding clean air. If the science from the EPA and the American Lung Association is to be believed then the Board must submit the most current and accurate report to the EPA. They may be suggesting poor methods or management of the California Air Resources Board. The EPA and American Lung Association seem to doubt the science of the board.

As of today the Board has a reputation for:

Lack of due diligence in employment screening

Conspiracy to hide the lack of due diligence

Lied to fellow board members and the public

Failed to follow the policy and procedures required of the board regarding terms of service and overall transparency.

Suppressed contrary studies and reports. Impugned the credibility of those critical reports.

For these reasons the Board should reject this report.

Hank de Carbonel