

REQUEST TO POSTPONE AND REASSESS CARB DIESEL REGULATIONS

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General Concerns Regarding Air Pollution Health Effects and Regulations

- 1) Pollution levels are much lower today than in previous decades and current health risks are small.
- 2) Small epidemiologic associations are often spurious, rather than cause-and-effect relationships.
- 3) Regulations designed to solve one problem may have consequences that do more harm than good.
- 4) Scientists who are not popular activists are often marginalized and their important research is ignored.
- 5) Conflict of interest regarding power and funding exists between regulators and conforming scientists.
- 6) New regulations must be based on a fair evaluation of all available evidence from diverse sources.

Specific Concerns Regarding October 24, 2008 CARB Staff Report on PM2.5 and Premature Deaths

- 1) Authors have no relevant peer reviewed publications and lead author has misrepresented his "Ph.D."
- 2) Report and public comments were never shown to outside reviewers as stated in Executive Summary.
- 3) Five independent sources indicate no current relationship between PM2.5 and deaths in California.
- 4) California has fourth lowest total age-adjusted death rate among US states and few "premature deaths."
- 5) Diesel toxicity and fine particulate air pollution in California are currently at record low levels.
- 6) Before approving new diesel regulations, CARB should fully evaluate PM2.5 and deaths in California.

Conclusion

Important epidemiologic and toxicologic evidence does not support adverse health effects of diesel claimed by CARB and new diesel regulations should be postponed until above issues are fully and fairly evaluated.