

**August 25, 2010 Comments on the EPA CASAC Particulate Matter Review Panel Draft Letter on  
Policy Assessment for the Review of Particulate Matter National Ambient Air Quality Standard—  
Second External Review Draft (June 2010)**

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My name is Michael Lewis. I represent the Construction Industry Air Quality Coalition, which is an organization of the major construction associations in California, which represents probably several thousand contractors and certainly most of the largest contractors in the state. And we have been for the last 20 years involved in air quality issues that effects construction activity. And I guess I wanted to, to comment on a couple of things in your letter.

One was, I think a recognition that there's a certain amount of scientific uncertainty and perhaps a great deal of it in some of this data. We in California have had a rough experience with that in the last couple of years and I think many of us who are lay people and not scientists have come to learn more about PM2.5 and PM10 than we ever thought possible and are struggling to try to deal with the scientific end of the decision making and policy setting process because it was something we just assumed was absolute in its determinations and I think what we've come to learn is, that's not the case.

There's a great deal of disagreement amongst the scientists that sometimes the data is cherry picked for purposes of coming to a conclusion that not all of the data gets included in the evaluation, I think as Dr. Enstrom has mentioned. We learned in California that despite research that was done by specific studies that perhaps some of the data was tortured to reach a conclusion in particularly with premature death. And when CARB assembled all these scientists in one room, earlier this year, and they were in a public forum presenting their positions I think that all of them finally concluded that they couldn't establish, at least in California, a link between 2.5 and premature death. And I think that was a revelation that surprised many of us and I think it's something that, that needs some extra consideration on your part in reaching the conclusions that you are attempting to get to.

Obviously there are regional differences in the impacts of 2.5. A one size fits all standard may not be the appropriate conclusion and we would ask you to at least recognize those differences and those impacts and recognize the breadth of the research that's being done, has been done and make sure that it all gets included in your consideration. Thank you.