

**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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I'm the executive director of the CA Dump Truck Owners Association. We are a statewide trade association that has represented businesses in the construction transportation industry since 1941. We presently represent 850 members ranging in size from one truck to over 400 diesel powered trucks that have been immensely affected by the diesel CARB rules. Three years ago, we had 1,700 members. We have lost 50% of our members and the remaining members are frankly under-employed in our state and industry.

Today, California has the highest unemployment and under-employment rate for all states with a large population and density. And I believe much of that can be traced directly back to the contrived science and policies of the UC Scientific Review Panel (SRP) here, that through its activist's positions which have led to draconian regulations of every shape and type has made it virtually impossible to build or manufacture anything in this state economically.

In this EPA CASAC report, we see many similarities between the science and claims that CARB used in their reports headed and written by an employee that was an academic fraud. We see that many of the same techniques of suppressing, manipulating and obfuscating data are in this CASAC report.

We're also disturbed by CARB's Executive Officer, James Goldstene's recent response to an editorial in a San Diego newspaper a month ago, he stated that the science related to particulate matter and its health effects are NOT 'uncertain' yet within the 2nd external review draft (June 2010) on page 2-21, the report (you all) state "we recognize that **important uncertainties remain** in this review related to understanding the temporal and spatial variable in PM2.5 concentrations, including PM2.5 components, and associated health impacts across geographic areas." We have been asking HEI, ACS and Dr. Krewski to perform a California specific analysis from his 2009 report for the last 7 months and we have been basically ignored. A report that should have taken **one day to perform**. Why, we believe, in fact know, there are no effects here in a state with supposedly the worst PM2.5 problems in the U.S. Why is that?

Secondly, CARB's Goldstene states or at least implies that this CASAC report is already "approved" as if it were finalized, finished, completed which would mean that this entire meeting today is an exercise in futility. What exactly is going on here? I want to know if this process is that compromised.

Finally, in his rebuttal, Goldstene eludes to the fact that within this "finalized" CASAC report there is a "new factor" for estimating premature deaths associated with PM2.5. We are curious as to what that means. We would hope that this "light extinction" concept, is not a "new factor." We look forward to hearing from this committee, as to exactly what, this new factor may be that Goldstene was alluding to.

Thanks.