

**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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Hello. Thank you for allowing me to speak. My name is James Enstrom. I am an epidemiologist at UCLA, specifically the Jonsson Comprehensive Cancer Center.

I'm quite concerned that the section of the Second External Review Draft on health effects associated with long term PM2.5 exposure (page 2-15 and Figure 2-4 on page 2-62) does not accurately reflect all the available epidemiologic evidence, particularly the evidence specific to California. My 2005 paper, using the California Cancer Prevention Study, is entirely omitted, as is every paper from the California Adventist Health Study of smog (AHSMOG). These studies were included in the First External Review Draft of March 8, 2010 and in the February 26, 2010 presentation made by Dr. Mary Ross at the CARB symposium on PM2.5 and premature deaths in Sacramento. These studies and other available evidence should be included in the final versions of the EPA policy and risk assessments for PM2.5 and they should be fully and accurately described. And these studies should be included in Figure 2-4. In particular, this figure should be expanded to include one section devoted to all causes of death and another section devoted to specific causes of death.

In addition, the section entitled, "Uncertainties in the Evidence," on page 2-20, should be revised in order to accurately and adequately discuss the geographic variation in PM2.5 mortality risk across the United States. All the uncertainties involved in establishing a casual relationship between PM2.5 and mortality should be adequately discussed. I intent to submit my specific comments regarding the Second External Review Draft in writing to EPA and I thank you for this opportunity to speak.