

January 16, 2025

Enstrom Email and Dunn Letter re scientifically and economically unjustified 9 µg/m<sup>3</sup> PM<sub>2.5</sub> NAAQS to CARB Research Division Chief Elizabeth Scheehle (<https://www.linkedin.com/in/elizabethscheehle/>).

----- Forwarded message -----

From: **James E. Enstrom** <[jenstrom@ucla.edu](mailto:jenstrom@ucla.edu)>

Date: Thu, Jan 16, 2025 at 1:00 PM

Subject: Fwd: Response CARB proposed Implementation of 9 µg/m<sup>3</sup> PM<sub>2.5</sub> NAAQS

To: Elizabeth Scheehle <[Elizabeth.Scheehle@arb.ca.gov](mailto:Elizabeth.Scheehle@arb.ca.gov)>

Cc: John Dunn <[jddmdjd@web-access.net](mailto:jddmdjd@web-access.net)>

Dear Ms. Scheehle,

I greatly appreciate our detailed discussion of CARB and the PM<sub>2.5</sub> NAAQS today. I have given you my scientific perspective. I strongly recommend that you speak with John D. Dunn, MD, JD, who can give you his medical and legal perspective over the phone. Please read his January 2 email message below, which was copied to you. For the past 20 years Dr. Dunn and I assembled and presented strong evidence that PM<sub>2.5</sub> does not cause premature deaths. We have shown that the PM<sub>2.5</sub> NAAQS is scientifically unjustified. Dr. Dunn has provided pro bono help and expertise to me and numerous California businessmen regarding the PM<sub>2.5</sub> issue. Dr. Dunn would be pleased to speak with you.

Thank you for your consideration.

James E. Enstrom, PhD, MPH

----- Forwarded message -----

From: **John Dunn** <[jddmdjd@web-access.net](mailto:jddmdjd@web-access.net)>

Date: Thu, Jan 2, 2025 at 8:26 PM

Subject: Response CARB proposed Implementation of 9 µg/m<sup>3</sup> PM<sub>2.5</sub> NAAQS

To: James E. Enstrom <[jenstrom@ucla.edu](mailto:jenstrom@ucla.edu)>, Jason G. Su PhD <[jasons@berkeley.edu](mailto:jasons@berkeley.edu)>

Cc: Max Aung PhD MPH <[maxaung@usc.edu](mailto:maxaung@usc.edu)>, Sandrah Eckel PhD <[eckel@usc.edu](mailto:eckel@usc.edu)>, Elizabeth Kamai MSPH PhD <[kamai@usc.edu](mailto:kamai@usc.edu)>, Marianthi-Anna Kioumourtoglou ScD <[mk3961@cumc.columbia.edu](mailto:mk3961@cumc.columbia.edu)>, Michael Benjamin <[michael.benjamin@arb.ca.gov](mailto:michael.benjamin@arb.ca.gov)>, Elizabeth Scheehle <[Elizabeth.Scheehle@arb.ca.gov](mailto:Elizabeth.Scheehle@arb.ca.gov)>, Mark Hixson <[mark.hixson@arb.ca.gov](mailto:mark.hixson@arb.ca.gov)>, Sylvia Vanderspek <[sylvia.vanderspek@arb.ca.gov](mailto:sylvia.vanderspek@arb.ca.gov)>, Alicia Kindred <[alicia.adams@arb.ca.gov](mailto:alicia.adams@arb.ca.gov)>, ARB SIP Planning <[SIPPlanning@arb.ca.gov](mailto:SIPPlanning@arb.ca.gov)>

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January 5, 2025

Ladies and Gents of the CARB and its researchers,

I respond to the CARB invitation to a workshop public comment session, apparently intended to explain and justify another reduction in small particle allowable levels. I am reminded of a similar event in 2010 when CARB was engaged in a debate with members of the scientific and business community in the midst of a CARB campaign to show small particles were lethal and harmful and CA must control small particle air pollution to reduce the deaths and toxic effects.

CARB lost that debate when their all-star panel couldn't prove its case. They lost the debate because a bunch of us who know junk science when we see it came to the party and showed up the CARB shills. However, not to be deterred CARB and its designated science officials and operatives licked their wounds and commissioned Dr. Jarrett and others to gin up another study to prove they were right and the critics were wrong. Jarrett did a typical uncontrolled population study and data dredged temporal-spatial data to get a small non-proof relative risk/hazard ratio--it was a joke study that cost 750 K.

I am a physician attorney and I know how multiple sampling (data dredging) in uncontrolled population studies can create "associations" measured as relative risk. I am familiar with CARB scientist use of small associations from big studies cobbled together so that the researcher can claim a small p value and sacred "statistical significance." Jarrett [et.al](#) ginned up small associations by data dredging combined with p hacking to produce a hilarious repeat of other CARB studies, but the researchers proudly announced that the study results were "statistically significant" pretending that was the equivalent of material, relevant, competent and probative evidence. The magic proposed was that statistical significance is equivalent to reliable truth on the issue of causation. Stop the music--that is not so and everyone who reads this email knows that it is not so. Even a college level student of epidemiological methods would know what CARB was doing--big uncontrolled studies, multiple sampling, p hacking, bragging on inadequate relative risk results, Richard Feynman called it cargo cult science.

Best part of the story is publishing results with confidence intervals that included a RR of 1.0, the researchers putting lipstick on a statistical pig.

Here are the commentary and letters I wrote in 2011, not new because CARB is still the same junk science research and policy/regulation making machine, popping out bad studies and regs like a PEZ dispenser while beating the big scare drum:

- Critiques of Final Report for CARB Contract No. 06-332  
(<http://www.scientificintegrityinstitute.org/JerrettCriticism102811.pdf>)  
(<http://www.scientificintegrityinstitute.org/Dunn060911.pdf>)
- October 26, 2011 Second Dunn Critique  
  
(Summary read by Hank de Carbonel on October 28, 2011  
(<http://www.scientificintegrityinstitute.org/Dunn102611.pdf>)
- June 9, 2011 verbal comments by Dr. Enstrom, Dr. Matthew A. Malkan of UCLA, Mr. Brown, and Dr. Dunn as read by Hank de Carbonel  
(<http://www.scientificintegrityinstitute.org/CARBRSC060911.mp3>)
- October 28, 2011 verbal comments read for Drs. Enstrom, Malkan, Dunn, Lipfert, and Fulks, and Mr. Brown (<http://www.scientificintegrityinstitute.org/CARBRSC102811.mp3>)  
or(<http://www.cdtoa.org/CARBdocs/2011-10-28-SRatCARBreJerret.MP3>)

In these commentaries I point out Michael Jarrett's team's creative effort to do spatial-temporal jiggering and sampling to produce small no proof but positive associations. I think it a shame and disgrace that CARB and its hired research operatives have no respect for the rules advocated in the *Reference Manual on Scientific Evidence*, published by the Federal Judicial Center that advocates respecting the Bradford Hill rules on proving causation and basic rules on how to manage and evaluate data. Small relative risks in uncontrolled population studies are well known to be no proof and legitimate epidemiology requires Relative Risks of 3 or more as robust enough. CARB continues to just pretend they are sponsoring good science in the public interest--nonsense, they are promoting junk science so they can promote regulations they want to see burden citizens, business and industry.

I know the well credentialed and educated readers of this letter know the rules that they are violating by sponsoring and promoting these enviro scare studies about killer this or that, including the focus of this letter, CARB sponsored small particles studies used to justify CARB's aggressive recommendations on small particles regulations. How is it that the new small particle proposal and its supporting science would be shown to fail with a letter I wrote in 2011--well because the CARB and USC small particle fanatics haven't improved on their junk science methods and their treacherous perfidious policy advocacy?

I would gladly show up for another debate to show that CARB produces the same junk research now as it did more than 10 years ago that I discussed in my letter of 2011 that details the same criticisms and exposes the same silliness of today. CARB and its paid "scientists" lost the old debate convincingly and the risible Jarrett study that followed on was an effort to rehabilitate but it came a cropper, another undisciplined effort to make small particles out to be a lethal threat to civilization and the human race.

Political tyrants can't let a scare/crisis go to waste. The regs proposed now are just as misguided and inappropriate as the ones proposed in 2010. The new ones will pile on more negative economic impact and be evidence that CARB continues to be mendacious, malignant, misanthropic and destructive in its regulatory conduct and policies.

I have no hope CARB and its scientists will withdraw from this latest regulatory move; however a new administration in Washington and a new EPA may be the therapy that people at USC and CARB need. I would skip a meal or two to help deliver that cure for CARB's addiction to junk science and misguided policies. The addressees on this email would be well advised to shut down the project to promote new more stringent and certainly unnecessary new regulations, retire to reconsider their scientific misconduct, however if they insist they should be required to engage a debate, not the usual sleep walking public comment event, and another debate will remove all doubt that that CARB sponsors and promotes junk science and bad policies and regulations because it is motivated by perverse environmentalist ideological agendas.

Set a date for the debate and remove all doubt about CARB research's lack of scientific integrity. It won't take me but a few minutes to update my letter of 2011 since CARB still engages in the same small particle research scientific fraud. I may ask cement pumper/writer-columnist Hank de Carbonel to read my updated letter into the debate record so I don't have to endure the depressing experience of spending time in a failing state that once represented the American dream and success story. There was a time in my life that traveling to CA was a pleasure. No longer--CA is failing fast, thanks to the apparatchiks and nomenklatura in CA government and academia.

Cordially,

/JDunn MD/

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