

June 10, 2021

President Joe Biden
The White House
1600 Pennsylvania Avenue
Washington, DC 20500

Administrator Michael Regan
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

RE: Strengthen the National Ambient Air Quality Standards for Ozone and Particulate Matter

Dear Mr. President and Administrator Regan,

On behalf of our millions of members and supporters, we urge you to move swiftly to set stronger primary and secondary National Ambient Air Quality Standards for dangerous particulate matter (PM) and ozone pollution. The latest science and medical data demonstrate the urgent need for tighter limits on these harmful and pervasive pollutants, particularly to protect vulnerable populations including children, older Americans, people with asthma, pregnant people, people with underlying health conditions and sensitive ecosystems.

Our organizations thank you for your early actions and leadership to begin rebuilding the Environmental Protection Agency and return the agency to its critical work of protecting public health and the environment. We are encouraged by your commitments to address historic environmental injustices and to restore the role of science in setting federal health and environmental standards. We urge you to prioritize updates to the ozone and particulate matter primary and secondary standards as a central part of EPA's plan to build back better. Stronger standards for ozone and particulate matter will significantly benefit public health and the environment, while also helping advance efforts to combat climate change. This is important for all Americans, but particularly fenceline and environmental justice communities who are more likely to live in areas with dirty air and bear heavier burdens from the effects of climate change and extreme weather.

Too many Americans suffer health harms and premature death because the air where they live is unsafe to breathe. Study after study has shown that the areas with the dirtiest air continue to be disproportionately lower-income communities and Black or Latinx neighborhoods. The American Lung Association's 2021 "State of the Air" report found that more than 40% of Americans currently live in places with unhealthy levels of ozone and PM pollution. Additionally, the COVID-19 pandemic shined a spotlight on the legacies of environmental racism. Communities with poor air quality, disproportionately lower-income families and people of color, experienced higher than average rates of sickness and death from the virus.

In its last months, the previous administration finalized its review of the national standards for ozone and particulate matter. The review process was seriously undermined by sustained curtailment of public participation as well as the sidelining of scientific input. Despite robust scientific evidence indicating that current standards are too weak to adequately protect Americans from the health and environmental harms of pollution, as well as strong public opposition to the anti-science proposals, the previous administration declined to strengthen these pollution protections and finalized do-nothing primary and secondary standards that fail to protect people and ecosystems.

On behalf of the 74 undersigned organizations and our millions of members of supporters across the nation, we ask you to prioritize fixing this major public health and environmental problem by reconsidering and updating these standards based on the latest available science. We urge the agency to draw on the advice of newly formed panels of independent experts regarding the health and welfare effects of these harmful pollutants. We urge you to move aggressively to finalize reconsideration of the particulate matter standards by summer 2022 and the ozone standards by winter 2022/spring 2023.

Americans need our leaders to act boldly and decisively to clean up deadly air pollution and ensure communities have access to information about their local air quality conditions. The previous administration shirked its responsibility to follow the science and strengthen the particulate matter and ozone standards and suppressed the contributions of scientists and experts to the process. The previous administration's inaction cost lives and let pass an opportunity to make measurable improvements in air quality in communities and sensitive ecosystems across the country.

Fine particulate matter, or soot, is an extremely dangerous pollutant, a deadly mix of metals, organic chemicals, and acidic substances that are so small they can be inhaled deeply into the lungs and enter the bloodstream. Soot comes from many sources, including fuel combustion and industrial processes that result in greater exposure for communities of color. In addition to increases in overall mortality rates, hospitalization rates, and emergency room visits, fine particle pollution is linked to many serious health harms, including asthma, heart attacks, stroke, heart disease, COPD, Parkinson's disease, dementia, low birth weight, preterm birth, and infant mortality. There are ample peer-reviewed studies, including a number of important advanced studies the previous administration ignored in the last review, that clearly show that stronger annual and daily standards are needed and would save many lives. EPA's data estimates that even if the air quality around the country met the existing fine particulate matter standards, 50,000 lives would still be prematurely lost, and a recent study estimated that fine particulate matter is responsible for between 85,000-200,000 excess deaths annually.

Ground-level ozone, or smog, is a result of industrial emissions from power plants, refineries, factories, and vehicle emissions combining with sunlight in the atmosphere. Ozone pollution can trigger asthma attacks and increase the risk of heart and lung diseases, particularly in children, older adults, and people who are active outside, like outdoor workers. When the national standard for smog was updated in 2015, EPA's independent science advisors warned that it might not be adequately protective, and after six more years of research, there is increasing

evidence that a more protective, science-based standard is necessary to adequately protect the health of our communities.

These pollutants do not just harm public health: they also damage the environment, diminishing breathtaking views, curbing tree and plant growth (including crops), and even damaging whole ecosystems. For well over a decade, EPA's independent scientific advisors have made clear that these harms occur even at pollution levels the current standards allow. The science underlying those expert findings has strengthened over time, yet the standards have failed to keep up. Indeed, EPA's 2008 and 2015 attempts at setting environment-protective secondary ozone standards were rejected in court because they violated the Clean Air Act and failed to rationally follow the science. Especially with climate change's threat to our environment, it is long past time for EPA to set strong, independent ozone and particulate matter secondary standards that follow the evidence and protect the environment against these damaging pollutants.

EPA's mission is to protect public health and the environment, and strengthening these standards based on sound scientific and medical evidence will do just that by saving lives and cleaning up dirty air for over 135 million Americans. Stronger particulate matter and ozone standards will also help protect the great outdoors, improving vistas, enhancing forests' carbon sequestration, protecting our crops, and strengthening entire ecosystems. Reductions in these pollutants will also likely have important carbon reduction co-benefits. The benefits of stronger standards will undoubtedly benefit the health and well-being of our natural environment, all people across the country, and particularly those who have been disproportionately burdened by these harmful air pollutants. We urge EPA to quickly act to set evidence-based primary and secondary standards that will begin to right environmental injustices and protect all Americans from these dangerous pollutants.

Sincerely,

Adirondack Council
Air Alliance Houston
Alliance of Nurses for Healthy Environments
American Academy of Pediatrics
American College of Obstetrics and Gynecology
Appalachian Mountain Club
Asthma and Allergy Foundation of America
California Communities Against Toxics
California Safe Schools
Cease Fire Campaign
Center for Progressive Reform
Center for Reproductive Rights
Central California Asthma Collaborative
Central Valley Air Quality Coalition

Chesapeake Bay Foundation
Citizens for Safe Water Around Badger
Clean Air Carolina
Clean Air Task Force
Clean Water and Air Matter
Coalition for Clean Air
Coalition to Protect America's National Parks
Coney Island Beautification Project, Inc.
Conservation Law Foundation
Downwinders at Risk
Dream Corps Green For All
Earthjustice
Earthworks
Environmental Defense Fund
Environmental Integrity Project
Environmental Law & Policy Center
First Focus on Children
Food Integrity Campaign
Fresh Air Vallejo
Greater-Birmingham Alliance to Stop Pollution (GASP)
Greenaction for Health and Environmental Justice
GreenLatinos
Healthy Babies Bright Futures
Huntington Breast Cancer ACTION Coalition, Inc
Interfaith Power & Light
Leadership Counsel for Justice and Accountability
League of Conservation Voters
Little Manila Rising
Moms Clean Air Force
Mothers & Others For Clean Air
MountainTrue
National Center for Environmental Health Strategies
National Center for Health Research
National Parks Conservation Association
Natural Resources Council of Maine
Natural Resources Defense Council
North Carolina Conservation Network
Northeast Black Health Coalition
Oregon Environmental Council
PennFuture
Physicians for Social Responsibility AZ Chapter
Progressive Democrats of America, Tucson, AZ Chapter
San Juan Citizens Alliance
San Luis Valley Ecosystem Council

Seventh Generation
Sierra Club
Southern Alliance for Clean Energy
Southern Environmental Law Center
Southern Utah Wilderness Alliance
Texas Environmental Justice Advocacy Services
The CLEO Institute
The Climate Reality Project
The Michael J. Fox Foundation for Parkinson's Research
Toxic Free North Carolina
Tri-Valley Communities Against a Radioactive Environment
Union of Concerned Scientists
Utah Physicians for a Healthy Environment
West Berkeley Alliance for Clean Air and Safe Jobs
West End Revitalization Association (WERA)
WildEarth Guardians