

March 28th, 2023

Docket ID No. EPA-HQ-OAR-2015-0072

President Joseph R. Biden, Jr.
The White House
1600 Pennsylvania Ave, NW

Washington, DC 20500

The Honorable Michael S. Regan
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

Dear President Biden and Administrator Regan,

We the undersigned 180 groups write to express support for stronger National Ambient Air Quality Standards (NAAQS) for fine particulate matter pollution (PM 2.5), also known as soot. While we applaud the EPA's work to update the current standards, we are concerned that the draft proposal does not align with the recommendations of the majority of the Clean Air Scientific Advisory Committee (CASAC). Adoption of strong standards at the lowest end of the recommended range would make tremendous strides in delivering on your administration's promise to prioritize environmental justice in your decision making. We urge you to finalize, without delay, standards no higher than 8 $\mu\text{g}/\text{m}^3$ for the annual standard and 25 $\mu\text{g}/\text{m}^3$ for the 24-hour standard. We also urge the agency to finalize stronger secondary standards to protect our ecosystems and natural resources.

Exposure to fine particle pollution causes a range of health harms, such as increased infant mortality, cardiovascular and respiratory disease, asthma attacks, diabetes, dementia, and premature death. These health impacts disproportionately impact communities of color, fenceline communities, and lower-income households who are already overburdened by pollution and healthcare costs.

Standards no higher than 8 $\mu\text{g}/\text{m}^3$ (annual) and 25 $\mu\text{g}/\text{m}^3$ (24-hour) would be consistent with law and firmly supported by science. They would also provide substantially greater benefits over and do more to reduce mortality disparities across racial and ethnic groups than even the lowest end of the range EPA has proposed. Adopting the most stringent annual standard proposed by EPA - 9 $\mu\text{g}/\text{m}^3$ - would save more than 4,200 lives, but adopting the standard recommended by the majority of CASAC - 8 $\mu\text{g}/\text{m}^3$ - would save more than twice that number in the year 2032. Under current standards, Black Americans over 65 are 300 percent more likely to die from air pollution than White Americans. EPA's proposed standards, however, would barely begin to address these disparities. As EPA's own analysis shows, it could save seven times more Black

lives every year with a standard of 8 $\mu\text{g}/\text{m}^3$ compared to a standard of 10 $\mu\text{g}/\text{m}^3$. And an annual standard of 8 $\mu\text{g}/\text{m}^3$ would also essentially eliminate racial disparities in exposures to particulate matter pollution. The net benefits that could be realized under an annual standard of 8 $\mu\text{g}/\text{m}^3$ were estimated by EPA to total \$44-93 billion annually, higher than the benefits under an annual standard of 9 $\mu\text{g}/\text{m}^3$.

EPA must strengthen *both* the annual and 24-hour primary standards because both are critical for protecting public health. Communities that live closest to pollution sources like industrial facilities and heavily trafficked roads are disproportionately affected by short-term spikes in air pollution. Because of historically racist planning practices like redlining, these communities are often communities of color. Research suggests that people of color are disproportionately exposed to short-term spikes in soot pollution across all EPA regions, and that racial disparities in short-term soot pollution exposure may even be larger than disparities in long-term soot exposure. A majority of CASAC members recommended tightening the 24-hour standard, citing numerous scientific studies that support the decision. Strengthening only the annual standard is not enough to protect communities from dangerous short-term pollution spikes. EPA must act to right long-standing environmental and health injustices faced by frontline communities, and it can do so by finalizing the most protective standard.

Millions of Americans are counting on the EPA to advance solutions for pollution that protect our environment and right to clean air. We urge you to move quickly to finalize stronger, more protective primary and secondary standards (no higher than 8 $\mu\text{g}/\text{m}^3$ for the annual and 25 $\mu\text{g}/\text{m}^3$ for the 24-hour) for particle pollution.

Sincerely,

350 Humboldt

Hispanic Federation

Illinois Association of School Nurses

48217 Zip Code Air Monitoring Committee

Institute for a Progressive Nevada

Adirondack Council

Interfaith Power & Light

AFGE Local 704

Interreligious Eco-Justice Network

Air Alliance Houston

Iowa Environmental Council

Alliance of Nurses for Healthy Environments	Ironbound Community Corporation
Alternatives for Community and Environment	Kenwood Oakland Community Organization
American Academy of Pediatrics	La Mujer Obrera
American Society of Landscape Architects	League of Conservation Voters
American Sustainable Business Network	Learning Disabilities Association of America
ANA-California	LULAC Council 22387
	LULAC Council 4703
ANA-Illinois	LULAC Florida
ANA-New York	Macedonia Development Corporation, NFP
Animals Are Sentient Beings, Inc.	Metro east green alliance
Appalachian Mountain Club	MI Air MI Health
Appalachian Voices	Michigan Climate Action Network
Arizona Climate Action Coalition	Michigan Clinicians for Climate Action
Arizona Interfaith Power & Light	Michigan League of Conservation Voters
Asthma and Allergy Foundation of America	Michigan Sustainable Business Forum
Aytzim: Ecological Judaism	Missouri Nurses Association
Between the Waters	Moms Clean Air Force
Black Millennials 4 Flint	Moms Clean Air Force - Arizona

Breathe Project	Moms Clean Air Force Georgia
California Communities Against Toxics	Moms Clean Air Force, Michigan
California Safe Schools	Montana Environmental Information Center
Carolina Advocates for Climate, Health, and Equity	Montana Health Professionals for a Healthy Climate
Center for Biological Diversity	Mothers And Others For Clean Air
Center for Community Action and Environmental Justice	
Center for Progressive Reform	MoveOn Hoboken RESIST
Central California Asthma Collaborative	National Association of Neonatal Nurses
Central Valley Air Quality Coalition	
Chesapeake Climate Action Network	National Association of Pediatric Nurse Practitioners
Chicago Area Progressives	National Association of School Nurses
Chicano Latino Caucus of San Bernardino County	National Environmental Health Association
Chispa AZ	
Church Women United in New York State	National Parks Conservation Association
Citizens for Arsenal Accountability	National Student Nurses' Association, Inc.
	National Wildlife Federation
Citizens for Safe Water Around Badger (CSWAB)	Natural Resources Defense Council
Clean Air Task Force	NC100BW Inc. Greater Cleveland Chapter

Cleveland Lead Advocates for Safe Housing (CLASH)	Nevada Conservation League
Climate Action PA	New Hampshire Nurses Association
Climate Action Campaign	Commission on Planetary Health
Climate Crisis Policy Digest	New Jersey Audubon
Climate Reality Project Chicago Metro	New Mexico Environmental Law Center
Coalition for a Safe Environment	
Coalition to Protect America's National Parks	New Mexico Wild
Coalition to Protect New York	North American Climate, Conservation and Environment (NACCE)
COCO-Coalition of Community Organizations	Northeast Ohio Black Health Coalition
Comite Pro Uno	Old Southwest Inc. – Green Committee
Community Activist	OLÉ Education Fund
Community In-power & Development Association Inc.	One APIA Nevada
Coney Island Beautification Project, Inc.	Parents Engaging Parents PEPNJ
Conservation Voters of PA	Partnership for Policy Integrity
Cuyahoga County Section-NCNW	PennEnvironment
Dayenu: A Jewish Call to Climate Action	PennFuture
Defend Our Future	Pennsylvania Interfaith Power & Light

Delaware Nurses Association

Physicians for Social Responsibility,
AZ Chapter

Dogwood Alliance

Physicians for Social Responsibility

Don't Waste Arizona

Pitzer College Robert Redford
Conservancy

Downwinders at Risk

Poder Latinx

EARTHDAY.ORG

Powder River Basin Resource
Council

Earthjustice

Progressives for Climate

Earthworks

ProgressNow New Mexico

Prosperity Works

Ecology Center

Public Citizen

Elders Climate Action

Rachel Carson Council

Elected Officials to Protect America

Rep GA Institute Inc.

Environment America

Responsible Alpha, Inc.

Environmental Community Advocates of Galena Park

Environmental Defenders of McHenry County

Sierra Club

Environmental Defense Fund

Sierra Club - Grand Canyon Chapter

Environmental Integrity Project

Southern Alliance for Clean Energy

Environmental Law & Policy Center

Southwest Energy Efficiency Project

Evergreen Action

Extinction Rebellion US

Extinction Rebellion San Francisco Bay Area

Faith in Place

First Focus on Children

Florida Rising

Forest Keeper

FreshWater Accountability Project

Fridays for Future Charlotte

Friends of the Earth (FOE) - USA

GASP

Georgia Conservation Voters

Georgia Interfaith Power and Light

Great Lakes Business Network

Green The Church

Southwest Detroit Community
Benefits Coalition

South Fontana Concerned Citizens
Coalition

Sustainable Roanoke

Terra Advocati

The Clean Air Coalition of WNY

The Climate Reality Project:
Philadelphia and Southeastern PA
Chapter

The Michael J. Fox Foundation for
Parkinson's Research

The Union for Reform Judaism

Unlimited Potential

US Partnership for Education for
Sustainable Development

Utah Physicians for a Healthy
Environment

V Martin Environmental Justice
Consultant LLC

Valley Watch, Inc.

Virginia Clinicians for Climate Action

Vote Solar

Green the Church Louisiana

GreenLatinos

Health & Medicine Policy Research Group
Health & Medicine Policy Research Group

Health Babies Bright Futures

Health Care Without Harm

Healthy Environment Alliance of Utah

Healthy Schools Network

Hispanic Access Foundation

Warehouse Workers for Justice

Webb County LULAC #22387

Western Clean Energy Campaign

Western Resource Advocates

Wisconsin Green Muslims

Womxn From The Mountain