

January 16, 2024

Mr. John Podesta  
Senior Advisor to the President for Clean Energy Innovation and Implementation  
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 Senior Advisor Podesta and Administrator Regan,

We, the undersigned organizations, once again call for you to finalize a substantial strengthening of EPA's National Ambient Air Quality Standards (NAAQS) for fine particulate matter pollution (PM 2.5), also known as soot. EPA's review of the science shows 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. But these harms are not equitably spread: they are most acute in the communities that we live and work in. EPA's own analysis shows that Black populations and Latino/a populations die from fine particle pollution at up to 3 times the rate than other populations.

The scientific evidence supporting our request has only grown stronger since the proposed rule was published. A recent study published in the *New England Journal of Medicine* by researchers at Harvard's T.H. Chan School of Public Health analyzing Medicare data has highlighted the critical role that a strong soot standard would have in saving lives in our communities<sup>1</sup>. According to the study, while lower PM2.5 exposure was associated with lower mortality in the full population, historically marginalized subpopulations, both in terms of race and income, benefited more as PM2.5 levels decreased from 12 to 8 µg/m<sup>3</sup>. Put simply, the stronger the PM2.5 NAAQS, the more the environmental health disparities narrow.

As organizations that have dedicated our work to improving environmental justice in our communities, we are concerned that delay in issuing the final rule might signal a potential waver in the Administration's commitment to protecting vulnerable communities from air pollution. As we have said in prior comments and letters, and as the White House Environmental Justice Advisory Council wrote in June<sup>2</sup>, adoption of strong standards at the lowest end of the recommended range would make

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<sup>1</sup> Josey K P, Delaney S W, Wu X, Nethery R C, DeSouza P, Braun D and Dominici F. 2023. Air Pollution and Mortality at the Intersection of Race and Social Class, *New England Journal of Medicine*, <https://doi.org/10.1056/NEJMsa2300523>.

<sup>2</sup> Letter from Richard Moore & Peggy M. Shepard, Co-Chairs, White House Environmental Justice Advisory Council, to Brenda Mallory, Chair, Council on Environmental Quality (June 27, 2023), <https://www.epa.gov/system/files/documents/2023-07/Final%20WHEJAC%20Recommendations%20Letter%20on%20NAAQS%2020230627.pdf>.

tremendous strides in delivering on your administration's promise to prioritize environmental justice in your decision making. Finalizing a rule at 10 µg/m<sup>3</sup>—the highest end of EPA's proposal—would be seen as a major disappointment.

It has been over three months since EPA sent its final soot rule to OMB for interagency review. And we know that since it has been there, the Administration has been the target of a considerable pressure campaign from industry against the rule. That campaign rests on erroneous premises<sup>3</sup>. The Administration must not yield to it. Instead, the Administration must keep its commitments, follow the science, and, in doing so, promote environmental justice. EPA's decision on the soot standard is a generational chance to save lives and fulfill the promise of the Clean Air Act to communities that historically been overlooked by clean air standards. Millions of Americans are counting on the EPA to advance solutions for pollution that protect our environment and right to clean air<sup>4</sup>. We urge you to move this year to finalize stronger, more protective primary standards for particle pollution.

Sincerely,

350 Bay Area Action

350 Chicago

7 Directions of Service

7th Generation Advisors

Action Now

Adirondack Council

Alliance of Nurses for Healthy Environments

American Academy of Family Practice

Animals Are Sentient Beings, Inc

Appalachian Voices

Asian Pacific Environmental Network

Breathe Project

California Communities Against Toxics

California Interfaith Power and Light

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<sup>3</sup> Seth Johnson, Chamber of Commerce's Dubious Analysis of Clean Air Rules Is Wrong (Dec. 4, 2023), <https://earthjustice.org/experts/seth-johnson/chamber-of-commerces-dubious-analysis-of-clean-air-rules-is-wrong>; Robyn Winz, Putting Industry Claims to Rest: Data Reveals Economic Success Amidst Clean Air Rules (Oct. 10, 2023), <https://earthjustice.org/experts/robyn-winz/putting-industry-claims-to-rest-data-reveals-economic-success-amidst-clean-air-rules>.

<sup>4</sup> Earthjustice, Breathing in Danger: Mapping soot and smog pollution in the United States (Nov. 29, 2023), <https://earthjustice.org/feature/soot-smog-air-map-united-states-county>.

California Safe Schools  
Cease Fire Campaign  
Center for Biological Diversity  
Central California Asthma Collaborative  
Change the Chamber  
Clean Air Action Network  
Clean Air Action Network of Glens Falls  
Clean Air Coalition of Greater Ravena-Coeymans  
Clean Air Council  
Clean Water Action Council of NE WI  
Coalition For A Safe Environment  
Coalition for Clean Air  
ColorBrightonGreen  
Comité Diálogo Ambiental  
Comite Poro Uno  
Community Advocate  
Concerned Health Professionals of Pennsylvania  
Congressman Troy A. Carter  
Connecticut Coalition for Environmental Justice  
Dayenu: A Jewish Call to Climate Action  
Delaware Riverkeeper Network  
Don't Waste Arizona  
Downwinders at Risk  
Earth Ethics, Inc.  
East Yard Communities for Environmental Justice  
Ecology Center  
Endangered Species Coalition  
Environmental Integrity Project  
Environmental Justice Health Alliance for Chemical Policy Reform

Extinction Rebellion Delaware  
Extinction Rebellion San Francisco Bay Area  
Fossil Free Tompkins  
Franciscan Action Network  
GASP  
George Washington University  
Grassroots Environmental Education  
Green New Deal Virginia  
Green The Church  
GreenFaith  
GreenLatinos  
Ironbound Community Corporation  
JF Environmental Trust Foundation  
Kentucky Environmental Foundation  
Locust Point Community Garden  
Long Beach Alliance for Clean Energy  
Maine Youth Action  
Michigan Clinicians for Climate Action  
Moms Clean Air Force  
M-W & Associates  
Natural Resources Council of Maine  
New York Public Interest Research Group  
Northeast Ohio Black Health Coalition  
Partnership for Policy Integrity  
Passionist Solidarity Network  
People Demanding Action, NJ Chapter  
Port Arthur Community Action Network  
Port of Los Angeles High School  
Rachel Carson Council

Rise St. James

Rise Up West Virginia

Rise4EJ

San Pedro & Peninsula Homeowners Coalition

Santa Fe Forest Coalition

SEE (Social Eco Education)

Sisters of Mercy of the Americas Justice Team

Slingshot

Society of Native Nations

Southern Environmental Law Center

Stand.earth

Stop OAK Expansion Coalition

Stop the Algonquin Pipeline Expansion (SAPE)

Sunflower Alliance

Terra Advocati

texas environmental justice advocacy services

The Descendants Project

The Michael J. Fox Foundation for Parkinson's Disease

The Plastic Solutions Fund

The Quantum Institute

Turtle Island Restoration Network

Union for Reform Judaism

Unitarian Universalists for a Just Economic Community

United Church of Christ, Justice and Local Church Ministries

United Wilmington Youth Foundation

Valley Watch, Inc.

West Berkeley Alliance for Clean Air and Safe Jobs

West Long Beach Association

White Rabbit Grove RDNA

Zero Waste Ithaca