August 31, 2012

The Honorable Lisa Jackson, Administrator
Environmental Protection Agency
Room 3000, Ariel Rios Building
1200 Pennsylvania Avenue
Washington, D.C. 20460

Attention Docket No. EPA–HQ–OAR–2007–0492. Re: National Ambient Air Quality Standards for Particulate Matter

Dear Administrator Jackson,

We, the undersigned organizations, strongly support the proposed revisions to the National Ambient Air Quality Standards for Particulate Matter and respectfully urge that the agency further strengthen the standards to protect public health and vulnerable communities with an adequate margin of safety.

Consistent with the most recent health science, we urge you to strengthen the annual standard for fine particulate matter to 11 micrograms per cubic meter and we recommend the 24-hour standard be strengthened to 25 micrograms per cubic meter, due to the public health threat posed by short-term exposure. Particulate matter is a deadly pollutant that causes asthma attacks, heart attacks, strokes, and premature deaths.[1] Children, older adults, people with lung and heart disease, and low-income individuals face the greatest risk of health consequences.[2] Strengthening the particulate matter health standards as demanded by science will prevent thousands of premature deaths, heart attacks, and visits to the hospital and emergency room each year.[3] Particulate matter is also the main cause of reduced visibility and haze which casts a pall over the scenic vistas in our revered National Parks, iconic natural areas that we must protect today and as vital legacies for future generations.

Particulate pollution exacts a heavy burden on human health. There are serious health risks associated with diverse sources of particulate matter pollution.

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[1] U.S. Environmental Protection Agency. Integrated Science Assessment for Particulate Matter, December 2009. EPA 600/R-08/139F.

[2] *See* Sacks, Jason D. *et al.*, Particulate Matter—Induced Health Effects: Who is Susceptible, 119 *Envt'l Health Perspectives* 446, 446 (Apr. 2011).

[3] American Lung Association, Clean Air Task Force, and Earthjustice, *Sick of Soot: How the EPA Can Save Lives by Cleaning Up Fine Particulate Air Pollution*, 2011. Available at: http://www.catf.us/resources/publications/view/159 and U.S. Environmental Protection Agency, Proposed National Ambient Air Quality Standards for Particulate Matter, 77 Fed. Reg. 126 (June 29, 2012).

Some of the largest sources of fine particulate matter are coal-fired power plants, diesel vehicles and equipment,[4] and residential wood smoke.[5]

Monitors with the highest measured concentrations of fine particulate matter tend to be located in areas where the population is more likely to be lower-income, have lower education levels, and minority.[6] Furthermore, lower socioeconomic populations may be more vulnerable to fine particulate matter because of proximity to roadways and industry, higher rates of pre-existing diseases, less access to health care, and nutritional deficiencies.[7] At the same time, rural areas are at high risk because of significant gaps in air monitoring.

Further, numerous scientific studies have now identified increased health risks in association with traffic-generated air pollution, including fine particulate matter. With more than 45 million Americans living less than 300 feet from a highway, there is growing concern about the health impacts of living near heavily traveled roads. One of the most significant aspects of the EPA proposal relates to the proposed extension of the fine particle monitoring network to the near road environment. Motor vehicle traffic is a major and undisputed source of emissions of ultrafine, fine and coarse particles. In order to protect all citizens' right to a safe and healthy air supply, as mandated by the Clean Air Act, it is imperative that our nation's air pollution air quality monitoring network require measurement of particulate concentrations near highways and other significant sources of particulate pollution. This protection is long overdue and it is critical that that these monitored concentrations, or the modeled equivalent, be considered in the designation of nonattainment areas and the development of associated air pollution control programs.

These crucial public health standards have been delayed far too long. Every year of delay has resulted in thousands of avoidable deaths, numerous heart attacks, asthma attacks, and other health impacts. The Clean Air Scientific Advisory Committee, EPA's independent science advisors, concluded that the current standards do not protect human health and should be strengthened. The American Thoracic Society, the American Academy of Pediatrics, the American Medical Association, the American Public Health Association and others have all called for more protective particulate matter standards.

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[4] American Lung Association, Clean Air Task Force, and Earthjustice, *Sick of Soot: How the EPA Can Save Lives by Cleaning Up Fine Particulate Air Pollution*, 2011. Available at: http://www.catf.us/resources/publications/view/159 and U.S. Environmental Protection Agency, Proposed National Ambient Air Quality Standards for Particulate Matter, 77 Fed. Reg. 126 (June 29, 2012).

[5] U.S. Environmental Protection Agency, "Residential Wood Heaters, New Source Performance Standards, Current Draft Revisions," Residential Wood Smoke Workshop, March 1, 2011. Available at: http://www.epa.gov/burnwise/workshop2011/NSPS-DraftRevisions-Wood.pdf

[6] U.S. Environmental Protection Agency, *Policy Assessment for the Review of the Particulate Matter National Ambient Air Quality Standards*, April 2011.

[7] *Ibid.*

We respectfully urge the agency to finalize strong standards that protect human health and the environment by no later than December 14, 2012, in accordance with the proposed consent decree.

Sincerely,

Air Alliance Houston
Alliance for Affordable Energy
Alliance for Heath Promotion
American Bottom Conservancy
Center for Biological Diversity
Chelsea Board of Health
Chelsea Collaborative
Citizens for Pennsylvania's Future
Clean Air Carolina
Clean Air Task Force
Clean Air Watch
Clean Water Action
Clean Water Action Michigan
Clean Water Action Rhode Island
Communities for a Better Environment
Conservation Law Foundation
Environment & Human Health, Inc.
Environment Illinois
Environment Northeast
Environmental and Energy Study Institute
Environmental Defense Fund
Fresh Energy
Green For All
Greenpeace USA
Hoosier Environmental Council
Improving Kids' Environment
Kentucky Resources Council
Massachusetts Climate Action Network
Midwest Environmental Advocates
Mining Impact Coalition of Wisconsin
Moms Clean Air Force
Mothers & Others for Clean Air
NAACP
National Resources Defense Council
National Wildlife Federation
New York Public Interest Research Group
Powder River Basin Resource Council
Respiratory Health Association
Safe Air for Everyone
Save Our Sky Blue Waters
Save the Dunes
Sierra Club
Southern Alliance for Clean Energy
Uranium Watch
US Climate Action Network
Valley Watch
Wasatch Clean Air Coalition
Western Environmental Law Center