

Scott Pruitt, Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

February 5, 2018

RE: 2015 Ozone NAAQS Designations – Docket Number: EPA-HQ-OAR-2017-0548

Dear Administrator Pruitt,

On behalf of the undersigned health, faith, environmental justice, and conservation organizations, we write to respectfully urge that the U.S. Environmental Protection Agency prioritize protection of public health and finalize science-based “designations” for the 2015 ozone standard. Only once EPA finalizes these “designations”—formal identifications of whether every community has healthy or unhealthy levels of ozone—do the Clean Air Act’s protections designed to clean up unhealthy air kick in. Thus, the designations at issue here are vitally important to realizing the clean air improvements, and the resulting health benefits, from the health-based 2015 ozone standard. We oppose any designations that do not accurately reflect the air quality monitoring data and that would withhold critical local air quality information from communities and states. We further oppose any designations that irrationally and illegally cut down on the size of the “nonattainment” areas that must reduce their air pollution levels, which must include not just areas with unhealthy air, but also those areas that contribute to unhealthy air in nearby communities.

Since passage of the 1990 Clean Air Act amendments, our country has made tremendous progress improving air quality and reducing deadly ozone, or smog, pollution. Unfortunately, however, these improvements have not been enjoyed equitably and the health burdens of ozone pollution are not evenly distributed. Too many communities remain overburdened with dirty air and are regularly exposed to unsafe levels of ozone pollution. Lower-income communities and communities of color bear a disproportionate share of the health harms from air pollution. Seniors, children, outdoor workers and people with pre-existing respiratory ailments are also particularly vulnerable.

Americans are counting on EPA to enforce the Clean Air Act and take strong action to clean up ozone pollution and protect our families. You yourself have called “ensuring that more Americans are living and working in areas that meet national air quality standards” “one of the most important areas of EPA’s work,” and have committed EPA to continuing “to work with states, tribes, and local air agencies to help more areas of the country come into compliance.” Accordingly, consistent with legal requirements and your own statements, we urge the agency to uphold science and transparency, while prioritizing public health, at every stage of the implementation process. Anything less would fall short of what Congress has required, would violate the law, and would be irrational.

We look forward to monitoring your actions and appreciate your consideration of our views.

Sincerely,

Air Alliance Houston
Alliance for Climate Education (ACE)
Alliance of Nurses for Healthy Environments
American Public Health Association
Appalachian Mountain Club
Center for Biological Diversity
Connecticut Coalition for Environmental Justice
Defend Our Future
Earthjustice
Earthworks
Environment Texas
Gasp
Good Neighbor Steering Committee
GreenLatinos
Harambee House - Citizens for Environmental Justice
Hip Hop Caucus
Jesus People Against Pollution
League of Conservation Voters
League of Women Voters of the United States
Little Village Environmental Justice Organization
Moms Clean Air Force
Natural Resources Defense Council
North Carolina Environmental Justice Network
Physicians for Social Responsibility
Respiratory Health Association
Sierra Club
Southern Environmental Law Center
Texas Environmental Justice Advocacy Services (T.E.J.A.S.)
Utah Physicians for a Healthy Environment
WE ACT for Environmental Justice