

December 21, 2023

The President
The White House
Washington, DC 20500

Dear Mr. President:

We write to you today on behalf of the National Association of Clean Air Agencies (NACAA)¹ to reinforce our association's support for swift action by your Administration to finalize more protective National Ambient Air Quality Standards (NAAQS) for particulate matter (PM).

Fine particulate matter (PM_{2.5}) is linked with tens of thousands of premature deaths annually as well as serious respiratory and cardiovascular impacts, cancer and other detrimental health effects. Based on the currently available science, no level of PM_{2.5} is known to be safe. However, the Clean Air Act requires that the NAAQS for PM_{2.5}, like the NAAQS for each criteria pollutant, undergo constant science-based reviews by highly qualified experts to ensure they keep pace with the most current scientific research to protect public health with an adequate margin of safety.

From the outset of this Administration, NACAA has encouraged EPA's reconsideration of the agency's December 18, 2020, final decision to retain, without revision, the 2012 PM NAAQS. We have done so because after closely observing the review process that led to the April 30, 2020, proposal of that decision we concluded that the review process was flawed; that it resulted in a flawed proposed decision by the EPA Administrator, particularly with respect to the health-based (primary) PM_{2.5} standards; that the Administrator's proposed action should be withdrawn; and that a revised review process should be undertaken.

With respect to implementation of more protective standards, it is imperative that EPA maintain a strong firewall between setting or revising health-based NAAQS and addressing issues related to implementing those NAAQS. We do, however, acknowledge that any decisions EPA makes to revise the PM NAAQS will have a profound impact on the work of state and local air pollution control agencies. Toward this end, we urge that the Administration recognize this fact and take timely action on several fronts, as articulated in NACAA's March 28, 2023, comments on EPA's January 27, 2023, proposed rule, *Reconsideration of the National Ambient Air Quality Standards for Particulate Matter*.²

Also regarding implementation, we note that some have expressed concern over potential impacts on U.S. supply chains, manufacturing and infrastructure. Based on decades of experience, NACAA has confidence that even with more protective standards the economy will continue to grow as air quality and public health improve. In *Our Nation's Air: Status and Trends Through 2022*, published on May 23, 2023, EPA states, "Between 1970 and 2022, the combined emissions of the six common [criteria] pollutants (PM_{2.5}

¹ NACAA is the national, nonpartisan, nonprofit association of 157 air pollution control agencies in 40 states, including 117 local air agencies, the District of Columbia and five territories. The air quality professionals in our member agencies have vast experience dedicated to improving air quality in the U.S. This letter is based upon that experience. The views expressed in this letter do not represent the positions of every state and local air pollution control agency in the country.

² https://www.4cleanair.org/wp-content/uploads/NACAA_Comments-EPA_Proposed_PM_NAAQS_Recon-032823-lh.pdf, pp. 6-8.

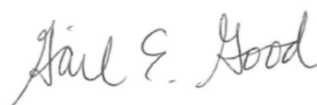
and PM₁₀, SO₂, NO_x, VOCs, CO and Pb) dropped by 78 percent. This progress occurred while the U.S. economy continued to grow, Americans drove more miles and population and energy use increased.”³

NACAA’s mission is to protect clean air and public health and improve the capability and effectiveness of state and local air agencies as we work tirelessly to fulfill our responsibility under the Clean Air Act to prevent and control air pollution so that our constituents will breathe clean, healthful air. We cannot succeed unless our federal regulatory partners make well-informed, thoughtfully considered policy decisions. NACAA believes that the PM NAAQS reconsideration proposal reflects such policy decisions and we urge the Administration to finalize the rule promptly to put in place the more protective standards that are now long overdue. If you have any questions, please contact us or Miles Keogh, Executive Director of NACAA.

Sincerely,



Wayne Natri
Los Angeles, CA
Co-Chair
NACAA Criteria Pollutants Committee



Gail Good
Wisconsin
Co-Chair
NACAA Criteria Pollutants Committee

cc: The Honorable Michael S. Regan, Administrator, U.S. Environmental Protection Agency

³ https://gispub.epa.gov/air/trendsreport/2023/documentation/AirTrends_Flyer.pdf.