

March 28, 2023

Mr. Michael S. Regan
Administrator
U.S. Environmental Protection Agency
Washington, DC 20460

Subj: Docket ID No. EPA-HQ-OAR-2015-0072-1543

Dear Mr. Regan,

As religious organizations from diverse faith traditions, we are united in our commitment to working towards a world in which God's sacred earth, our communities, and all individuals can flourish. At the most basic level, this requires clean air to sustain us.

Currently, more than four in ten Americans live in places where the air they breathe is harmful to their health.¹ An estimated 100,000 deaths each year in the United States can be attributed to human-caused emissions of soot pollution, also known as particulate matter or PM 2.5.² A dangerous and deadly pollution, soot has devastating public health impacts that can lead to premature death, shorter life expectancy, greater rates of diabetes and lung disease, adverse health effects on children,³ premature births, increased stillbirths and low birth weight in newborns.⁴ These impacts are felt disproportionately by low-income communities and communities of color, largely due to historic redlining and ongoing environmental injustices.⁵

The Environmental Protection Agency's (EPA) proposed soot standard is an important step forward in regulating PM 2.5 pollution. To correct environmental injustices and protect the health of God's earth and all communities, the EPA should set the annual pollution standard at the most stringent level under consideration, to 8 micrograms per cubic meter,⁶ which according

¹ American Lung Association, "State of the Air report" November 17, 2022.

<https://www.lung.org/research/sota/key-findings>

² Thakrar et al., "Reducing Mortality from Air Pollution in the United States by Targeting Specific Emission Sources", July 15, 2020.

<https://pubs.acs.org/doi/10.1021/acs.estlett.0c00424>

³ Boston College Global Observatory, "Children's Health".

<https://www.bc.edu/content/bc-web/centers/schiller-institute/sites/masscleanair/articles/children.html>

⁴ Jong-Tae Lee, "Review of epidemiological studies on air pollution and health effects in children", January 2021.

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7806407/>

⁵ Industrial Economics, "Analysis-of-PM2.5-Related-Health-Burdens-Under-Current-and-Alternative-NAAQS", April 15, 2022.

<https://globalcleanair.org/files/2022/05/Analysis-of-PM2.5-Related-Health-Burdens-Under-Current-and-Alternative-NAAQS.pdf#page=9>

⁶ The EPA rule proposes a PM2.5 "annual standard to a level of 9.0 to 10.0 mg/m³," while soliciting "public comment on alternative annual standard levels down to 8.0 mg/ m³ and up to 11.0 mg/m³, [and] on an alternative 24-hour standard level as low as 25 mg/m³." See, Reconsideration of the National Ambient Air Quality Standards for Particulate Matter, 88 Fed. Reg. 5558 (proposed January 27, 2023).

to one study would save an estimated 19,600 lives from PM-attributable deaths.⁷ The EPA should also tighten the daily standard to 25 micrograms per cubic meter to protect those who are most vulnerable.

The EPA has an opportunity to save thousands of American lives now and for generations to come. As people of faith who recognize and uplift the inherent dignity of all individuals and the simple right to breathe without risk of harm, we urge the EPA to issue stricter standards and help correct environmental injustices, promote public health, and protect God's Creation.

Sincerely,

Coalition on the Environment and Jewish Life
Committee on Domestic Justice and Human Development, United States Conference of
Catholic Bishops
Creation Justice Ministries
Franciscan Action Network
Dayenu: A Jewish Call to Climate Action
The Episcopal Church
Evangelical Lutheran Church in America
Green Chalice
Interfaith Power & Light
Lutherans for Restoring Creation
National Religious Partnership for the Environment
North Carolina Council of Churches
North Carolina Interfaith Power & Light
Sisters of Mercy of the Americas Justice Team
United Church of Christ, Justice and Local Church Ministries
The United Methodist Church – General Board of Church and Society
Unitarian Universalists for Social Justice

⁷ Industrial Economics, "Analysis-of-PM2.5-Related-Health-Burdens-Under-Current-and-Alternative-NAAQS", April 15, 2022. <https://globalcleanair.org/files/2022/05/Analysis-of-PM2.5-Related-Health-Burdens-Under-Current-and-Alternative-NAAQS.pdf>