

April 21, 2025

Lee M. Zeldin
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Dear Administrator Zeldin:

We, the undersigned 100 organizations, write to urge you to maintain and promptly implement a vital, lifesaving protection—the national ambient air quality standard for fine particulate matter (PM_{2.5} or soot) that was established in 2024. EPA has announced that it is revisiting the rule to decide what, if anything, to seek to change about the rule. The rule should remain because it is fully consistent with the Clean Air Act and the evidence. EPA followed all applicable legal requirements in promulgating it, it is exceedingly well-supported by a wealth of science, and it advances the Clean Air Act’s promise—which you have embraced—of providing clean air to every American. In your confirmation hearing, we were heartened to hear your commitment to “uphold EPA’s mission” to “protect the environment and public health.” The soot standard does exactly that—it saves lives. Weakening or delaying it will cost them.

Soot pollution kills people and causes or is linked to a wide range of other health challenges, including increases in hospitalization rates and emergency room visits, cases of asthma, heart attacks, strokes, heart disease, lung cancer, chronic obstructive pulmonary disease, Parkinson’s disease, dementia, low birth weight, preterm birth, and infant mortality. As the Supreme Court unanimously confirmed, in an opinion by Justice Scalia, the Clean Air Act clearly requires that, for air pollutants like soot, EPA must ensure that national ambient air quality standards protect public health, with an adequate margin of safety.¹

EPA painstakingly abided by the law in 2024. Its staff and independent outside experts—including one working for the State of Georgia’s Environmental Protection Division—unanimously agreed the prior soot standard was too weak. After years of work and thoughtful, public consideration, EPA updated the annual standard in line with recommendations from those same internal and external experts. There is no legally viable basis for weakening it.

The 2024 update will improve the lives of millions in our country by reducing the harms of deadly air pollution for communities across the country, including for those

who already experience disproportionate pollution burdens, such as Latino, Black, and low-income populations. EPA estimates that this new, health-protective standard will save 4,500 lives annually, avoid nearly 1 million cases of asthma-related health complications, avoid 290,000 lost work days, and generate up to \$46 billion in public health benefits by 2032.² So, EPA's 2024 action fits with the first pillar you said guides EPA's work—"Clean Air, Land, and Water for Every American."³

Standards like these are the core of EPA's mission. They have resulted in cleaner air and better lives for millions of Americans. And, with careful collaboration between the federal and state governments, and leveraging American business's ingenuity, this environmental success story is paired with economic success: since 1970, as air pollution has plummeted, economic growth has soared. You don't have to take our word for it—it's what your own agency finds.⁴

We believe in America's promise, including its promise of clean air for all and government of the people, by the people, and for the people. The vast majority of Americans regardless of political party support a strong EPA and public health protections.⁵ Our nation can have the clean air the 2024 soot standard promises along with economic growth, just as we have achieved repeatedly over time. The standard rests on firm legal and scientific footing, while weakening it or delaying its implementation would be unlawful and arbitrary. Accordingly, we urge you to ensure EPA moves ahead to realize the full promise of the 2024 soot standard by maintaining and fully and timely implementing it as the Clean Air Act requires.

Sincerely,

350 New Orleans
New Orleans, Louisiana

Air Alliance Houston
Houston, Texas

A Community Voice
New Orleans, Louisiana

Alaska Community Action on Toxics
Anchorage, Alaska

A Just Harvest
Chicago, Illinois

Allegheny County Clean Air Now
Pittsburgh, Pennsylvania

Accelerate Climate Solutions
Naperville, Illinois

Alliance of Nurses for Healthy
Environments
Mount Rainier, Maryland

Adirondack Council
Elizabethtown, New York

Animals Are Sentient Beings, Inc.
Watertown, Massachusetts

Appalachian Voices
Boone, North Carolina

Asthma and Allergy Foundation of
America
Arlington, Virginia

Atchafalaya Basinkeeper
Plaquemine, Louisiana

Between the Waters
Dayton, Ohio

Breathe Project
Pittsburgh, Pennsylvania

California Communities Against Toxics
Rosamond, California

California Safe Schools
Los Angeles, California

Center for Biological Diversity
Tucson, Arizona

Center for Environmental Health
Oakland, California

Center for Healthy Environments &
Communities, University of Pittsburgh
School of Public Health
Pittsburgh, Pennsylvania

Center for Progressive Reform
Washington, District of Columbia

Central Illinois Healthy Community
Peoria, Illinois

Cherokee Concerned Citizens
Pascagoula, Mississippi

Chesapeake Climate Action Network
Takoma Park, Maryland

Church Women United in New York
State
Rochester, New York

Citizens Coal Council
Washington, Pennsylvania

Clean Air Action Network of Glens Falls
Glens Falls, New York

Clean Air Coalition of Greater Ravena-
Coeymans
New Baltimore, New York

Clean Air Council
Philadelphia, Pennsylvania

Climate Action Campaign
Bayside, California

Climate Justice Alliance
National

Climate Reality Project Chicago Metro
Chapter
Chicago, Illinois

Conservation Northwest
Seattle, Washington

Creation Justice Ministries
Washington, District of Columbia

Defend Our Health
Portland, Maine

Don't Waste Arizona
Phoenix, Arizona

Earthjustice Action
Washington, District of Columbia

Eco-Justice Collaborative
Champaign, Illinois

EcoMadres
Washington, District of Columbia

Elevate
Chicago, Illinois

Environmental Defense Fund
New York, New York

Environmental Justice Health Alliance
for Chemical Policy Reform
National

Environmental Justice Law Society at
Vermont Law & Graduate School
South Royalton, Vermont

Environmental Law & Policy Center
Chicago, Illinois

Environmental Protection Network
Washington, District of Columbia

Equity in Health Advisors Network
Naperville, Illinois

FreshWater Accountability Project
Grand Rapids, Ohio

Friends of the Earth
Washington, District of Columbia

Go Green Illinois
Illinois

Green America
Washington, District of Columbia

Green Science Policy Institute
Berkeley, California

Greenlatinos
Washington, District of Columbia

Group Against Smog & Pollution
Pittsburgh, Pennsylvania

Hispanic Access Foundation
Washington, District of Columbia

It's Electric!
Michigan

Kentucky Resources Council, Inc.
Frankfort, Kentucky

League of Conservation Voters
National

Long Beach Alliance for Clean Energy
Long Beach, California

Memphis Community Against Pollution
Memphis, Tennessee

Metro East Green Alliance
Alton, Illinois

Midwest Sustainability Group
Grayslake, Illinois

Moms Clean Air Force
Washington, District of Columbia

Moms for a Nontoxic New York
Albany, New York

Montana Environmental Information
Center
Helena, Montana

Mothers & Others For Clean Air
Georgia

National Parks Conservation
Association
Washington, District of Columbia

National Wildlife Federation
Washington, District of Columbia

Natural Resources Defense Council
Washington, District of Columbia

New Mexico Environmental Law Center
Albuquerque New Mexico

New Virginia Majority
Richmond, Virginia

North American Climate, Conservation
and Environment
Roosevelt, New York

Northeast Ohio Black Health Coalition
Cleveland, Ohio

Ocean Conservation Research
San Rafael, California

Oil and Gas Action Network
Berkeley, California

Oregon Environmental Council
Portland, Oregon

Partnership for Policy Integrity
Amherst, Massachusetts

Physicians for Social Responsibility
Pennsylvania
Philadelphia, Pennsylvania

Plastic Pollution Coalition
Washington, District of Columbia

Progressives for Climate
Denver, Colorado

Protect All Children's Environment
Chapel Hill, North Carolina

Protect PT
Harrison City, Pennsylvania

Putnam Progressives
Putnam County, New York

Resource Renewal Institute
Fairfax, California

Respiratory Health Association
Chicago, Illinois

RiSE for Environmental Justice
Kansas City, Kansas
Kansas City, Missouri

Santa Cruz Climate Action Network
Santa Cruz, California

Sierra Club
National

Silvix Resources
Portland, Oregon

Social Eco Education
Los Angeles, California

Southern Environmental Law Center
Atlanta, Georgia

Terra Advocati
San Antonio, Texas

The Last Beach Cleanup
Laguna Beach, California

The Last Plastic Straw
Santa Cruz, California

Tri-Valley Communities Against a
Radioactive Environment
Livermore, California

Unitarian Universalists for a Just
Economic Community
National

Vermont Law & Graduate School's
Environmental Law Society
South Royalton, Vermont

Virginia Clinicians for Climate Action
Fairfax Station, Virginia

Warehouse Workers for Justice
Joliet, Illinois

West Berkeley Alliance for Clean Air
and Safe Jobs
Berkeley, California

West End Revitalization Association
Mebane, North Carolina

CC: Aaron Szabo, nominee, Assistant Administrator for the Office of Air and
Radiation;
Adam Gustafson, Principal Deputy Assistant Attorney General, ENRD

¹ *Whitman v. Am. Trucking Ass'ns*, 531 U.S. 457, 462-71 (2001).

² EPA, Final Rule to Strengthen the National Air Quality Health Standard for Particulate Matter: Health Sheet 1 (Feb. 7, 2024), <https://www.epa.gov/system/files/documents/2024-02/pm-naaqs-overview.pdf>.

³ EPA, EPA Administrator Lee Zeldin Announces EPA's "Powering the Great American Comeback" Initiative (Feb. 4, 2025), <https://www.epa.gov/newsreleases/epa-administrator-lee-zeldin-announces-epas-powering-great-american-comeback>.

⁴ EPA, Our Nation's Air: Air Quality Improves as America Grows, https://gispub.epa.gov/air/trendsreport/2024/documentation/AirTrends_Flyer.pdf (since 1970, emissions of pollutants subject to national ambient air quality standards have dropped 78%, while gross domestic product has increased by 321%)

⁵ Environmental Protection Network, 2024 Voter Priorities, <https://www.environmentalprotectionnetwork.org/wp-content/uploads/2024/11/2024-Post-Election-Poll-EPN-Questions-Deck.pdf>.