



Office of Information and Regulatory Affairs
Office of Management and Budget
Executive Office of the President
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Dear Mr. Chad Whiteman:

Thank you for the opportunity to meet with members of your team and the Environmental Protection Agency regarding the Tier III rule, Ozone rules and the Urban air toxics report to Congress that is currently under review by your Agency. I thought it would be useful to capture our verbal comments in a formal correspondence, on behalf of my organization, WE ACT for Environmental Justice, a 25-year old community based environmental justice organization with the mission of building healthy communities for communities of color, and/or low income.

I am sure you have heard from several mainstream environmental groups, private industry, health organizations, and others over the past couple of months in regards to Tier III. I'm sure they have shared with you data, facts, and statistics on the impacts of this ruling. What I'd like to share with you is my perspective, as a Mother, a researcher and my current role as a federal policy analyst for an environmental justice organization.

As a mom of two, and someone that has always cared for the most vulnerable in some aspect of my career, I just want to emphasize that the decisions that are made in Washington DC impact everyone – in various cities and town across the US, in many different ways. While I am not originally from Harlem, New York where WE ACT for Environmental Justice is based, I am originally from Detroit, Michigan that shares many of the same challenges as Harlem, from an economic and environmental standpoint. While Detroit is primarily known as the Motor City, it is also home to one of the largest international crossings that connect the United States and Canada, the Ambassador Bridge. The Ambassador Bridge is a major source of truck and vehicular traffic that pours numerous emissions in many of the neighborhoods where my family and friends live in Southwest Detroit. These emissions can impact the community in more ways than one.

As a teenager, I worked in our family business - in workforce development for those residents moving from welfare to work, as well as providing child care services, across the city of Detroit. Through our



anecdotal observations, we could tell a distinct difference between the health of our children that were in our Detroit-based child care centers, versus our children in our suburban centers. The burden of asthma and other respiratory related concerns was more prevalent in our children and parent's in our Detroit-based centers, compared to our suburban child care centers. Consequently, it is important to note that any rules or new standards that are promulgated will improve the health and the welfare of some of communities that are already overburdened in many ways. The days of missed school and work, and the cost of health care associated with maintaining chronic respiratory and cardiovascular diseases, and asthma, are crucial for our communities. Air quality, or the lack thereof - especially in already highly trafficked areas, in communities of color – becomes an additional social stressor for the families we have encountered in Detroit, Michigan, Harlem, New York, and many other similar communities.

As an engineer and a researcher, there are numerous studies that show a “disproportionate pollution burden” on low-income, communities of color. A 2012 study in the International Journal of Environmental Research and Public Health, takes a stab at understanding the health burden with air pollution, but also encapsulating the social factors that also shape the health profile of a community into the analysis. Those social factors, better known as social determinants of health include population, economic activity, unemployment and other variables. What this study has attempted to do – like few others – is to understand the cumulative burden of pollution risks on the hearts of communities. Ozone, Particulate Matter and other pollutants do not operate in silos. Therefore, when we come to a point where we can properly characterize the burden on the public, specifically environmental justice communities, we will probably have an even better understanding of the importance of the rules your team is working on. One particular point that I'd like to amplify is that ‘differential exposure equals differential response’. In most risk assessments, the baseline human is not a person that has been exposed to the stressors in an environmental justice community. So the proposed standards in Tier III will have the opportunity to shift the public health protections – in a major way – for these vulnerable communities.

It is also very important that we move on these standards before the end of the year because of our changing climate. Climate change is exacerbating the health burdens on our communities that come with all of these pollutants. As a climate change researcher, my work has really focused on the urban elderly and how their exposure and adaptation is challenged by extreme heat, or ‘heat waves’. If you add in the fact that it's harder for people to breathe in-general, due to physiological challenges and the current pollution landscape, when you add in the layer of heat waves, Tier III and other clean air standards will help reduce the health burdens.

Finally, we are all concerned with the ‘costs’ of making these rules happen – improved technology, more monitoring, stronger regulations to reduce criteria pollutant and Greenhouse Gas emissions. However, a recent white paper by a Columbia University professor that WE ACT has collaborated with on several research efforts, provides some interesting discussion about the costs and benefits of air regulations.



First, the health benefits for the 6 air rules proposed and enacted over the past couple of years have definitely outweighed the costs. Secondly, most people in the general public care about clean air, want regulation and agree with investments to make this happen. Third, there is no 'standard practice' yet by the EPA to incorporate environmental justice considerations into its assessment of cost and benefits. So if we just look at the minimum benefits for a regular community – these continued clean air efforts would be even more impactful for low income, communities of color.

Again, thank you for this opportunity to share an environmental justice perspective on the proposed standards. I hope that your team will move expeditiously and cautiously to complete the review of the Tier III so standards can be finalized by December 2013, as well as moving forward with Ozone and the Urban Air Toxics report to Congress.

Sincerely,

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