

September 28, 2020

U.S. Environmental Protection Agency
EPA Docket Center, Air and Radiation Docket
Mail Code 28221T
1200 Pennsylvania Avenue NW
Washington, DC 20460

Docket ID No. EPA-HQ-OAR-2018-0279

To Whom It May Concern:

We are submitting this letter on behalf of North Brooklyn Neighbors (NBN), a grassroots nonprofit organization serving the Greenpoint and Williamsburg sections of Brooklyn. We advance community-based solutions on issues of public space and the environment – through activism, education, and collaboration – to create a more just, healthy, and safe place to live and work. As such, we urge the EPA to strengthen the primary and secondary ozone National Ambient Air Quality Standards (NAAQS), most recently updated in 2015.

Current standards are not fully protective of human or ecosystem health, especially for our most vulnerable populations. One study, published since the most recent standard update found that even short-term exposures to ozone, “even at levels much lower than the current daily standards, are associated with increased mortality, particularly for susceptible populations.”¹ The Clean Air act requires that the EPA standards are set not to only protect the majority of the US population, but to protect sensitive subgroups.

In fact, there is a great deal of evidence that there is no safe threshold for ozone exposure.² We ask the EPA strengthen the ozone standards to 60 ppb or fewer in the current round of reviews, with the intention to continue ratcheting down in the years to come as new scientific evidence becomes available.

The EPA has previously put out a report that stated that, “On average, compared with air quality adjusted to just meet the existing standard, mortality and respiratory hospitalization risks decrease by 5% or less for where ambient concentrations are adjusted to meet a standard level of 70 ppb, 10% or less for meeting a level of 65 ppb, and 15% or less for meeting a level of 60 ppb. Larger risk reductions are estimated on days with higher O₃.³” In addition, this standard is more in line with standards set by some of the United

¹ Di Q, Dai L, Wang Y, Zanobetti A, Choirat C, Schwartz JD, Dominici F. Association of Short-Term Exposure to Air Pollution with Mortality in Older Adults. *JAMA*. 2017; 318: 2446-2456.

² Bell ML, Peng RD, Dominici F. The exposure-response curve for ozone and risk of mortality and the adequacy of current ozone regulations. *Environ Health Perspect*. 2006;114(4):532-536. doi:10.1289/ehp.8816

³ <https://nepis.epa.gov/Exec/ZyPDF.cgi/P100KCYL.PDF?Dockey=P100KCYL.PDF>

States' closest allies, such as Canada. The Canadian Ambient Air Quality Standard value for ozone is 63 ppb.⁴

Here in North Brooklyn, we have significant air quality issues, which takes its toll on both individual and community health. Our community is located in King's County, which is and has long been an area of nonattainment for the Clean Air Act, including 8-hour ozone limits. Our community's children and other vulnerable populations are already dealing with a number of air pollution issues which exacerbate respiratory problems, among other health issues. Even within New York City, which itself is an area of concern in relation to air quality,⁵ parts of our community are dealing with some of the worst health burdens from ozone in the city. Areas of Williamsburg and Bushwick, for example, have a 66% higher rate of asthma emergency department visits attributable to ozone levels for children under 18 than the average in Brooklyn. Meanwhile adults are also affected, with an 87% higher rate than the Brooklyn average and fully twice as high as the city average.⁶

Health Burden: Ozone (O3) Estimated health events attributable to ozone (O3) exposures, (average annual rate per 100,000 residents), April through September	Williamsburg - Bushwick			Williamsburg - Bushwick	
	Williamsburg - Bushwick	Brooklyn	NYC	Compared with other NYC neighborhoods*	Trend over time
Attributable asthma emergency department visits among children under 18 years of age, 2015-2017	145.3	87.3	101.9	Worse	Not Available
Attributable asthma emergency department visits among adults ages 18 years and older, 2015-2017	96.7	51.7	48.3	Worse	Not Available
Attributable asthma hospitalizations among children under 18 years of age, 2015-2017	20.5	16.5	18.7	Worse	Not Available
Attributable asthma hospitalizations among adults ages 18 years and older, 2015-2017	4.6	3.1	3.9	Worse	Not Available

Thus, while it is important to strengthen the ozone air quality standards, it is also vital that all areas of the United States attain compliance with the Clean Air Act. These standards are only as protective of health as they exist in the real world.

In addition to the primary standard, we must also consider the secondary NAAQS.

We are no longer living in a world in which the health of our ecosystems can be considered separately from the health of our communities. Ozone pollution is acknowledged by the EPA to be damaging to vegetation⁷ and lowering ambient ozone levels have been shown to improve carbon sequestration and to increase the removal of pollution. In cities, a healthy urban forest can counteract some of the urban heat

⁴ Environmental Reporting BC. Online at <http://www.env.gov.bc.ca/soe/indicators/air/ozone.html#:~:text=The%20Canadian%20Ambient%20Air%20Quality%20Standard%20value%20for%20ozone%20is,levels%20are%20%E2%89%A463%20ppb>

⁵ <https://nepis.epa.gov/Exe/ZyPDF.cgi/P100KCYL.PDF?Dockey=P100KCYL.PDF>

⁶ NYC Health, found at <http://a816-dohbsep.nyc.gov/IndicatorPublic/Report/ServerSideReport.aspx?reportid=78&geotypeid=3&geoentityid=211&boroughid=2>

⁷ <https://www.epa.gov/ground-level-ozone-pollution/ecosystem-effects-ozone-pollution>

island effect, keeping these vulnerable areas cooler during the hot summer months. In addition, wildfires may be more likely with exposure to higher levels of ozone⁸ and so a dangerous pattern begins. Increased tropospheric ozone leads to reduced vegetation growth and carbon sequestration which leads to increases in global temperature and heat stress for many communities.

In fact, it is impossible to consider air quality without looking at the state of our country today. Ozone pollution does not exist in a bubble. With the onslaught of COVID-19, respiratory health is an everyday conversation and many survivors of the virus, in addition to many others, may deal with ongoing respiratory issues for years to come. 2020 has also been a year of heavy smoke from wildfires in the western United States. With continued climate change, wildfires of this magnitude are increasingly likely to become the norm rather than the exception to the rule.⁹ These factors combine to make more important than ever that the baseline levels of ozone in the air are as protective of health as possible.

Again, we strongly urge the EPA to establish the primary and secondary ozone NAAQS that are much more protective of human health and the health of our planet.

Thank you again for considering our comments and we appreciate the opportunity to share our perspective.

Sincerely,



Anthony Buissereth
Executive Director



Lael K. Goodman
Environmental Justice Program Manager

⁸ <https://nepis.epa.gov/Exe/ZyPDF.cgi/P100KQLJ.PDF?Dockey=P100KQLJ.PDF>

⁹ <https://www.c2es.org/content/wildfires-and-climate-change/#:~:text=Climate%20change%20has%20been%20a,in%20the%20Western%20United%20States.&text=Research%20shows%20that%20changes%20in,these%20increases%20in%20wildfire%20risk.>