

**An Agenda for  
Clean Air**

**Protect the Air We Breathe**

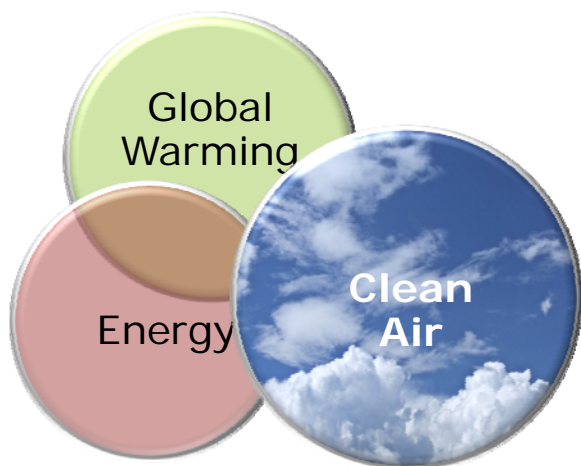


February 2009

# Protect the Air We Breathe

## Introduction

Even as the nation explores the complex challenges of global warming and energy, air pollution remains widespread and dangerous. Millions of Americans live in areas



of the country with recognized air pollution problems. Grave health effects—including premature death—stemming from dirty air are all too common. And the threat is not just to people: Dirty air sickens and kills plants and animals and creates ugly haze that obscures what should be spectacular views in many of our national parks.

The need to reduce global warming and our dependence on foreign oil

means that America has the opportunity to cut air pollution as these changes are made, but improvement in air quality will not happen automatically. Some proposals could actually worsen air quality. Now as the nation rightfully turns its attention to solving the global warming crisis and the need for energy, we risk overlooking the serious air pollution problems that continue to harm public health and the environment. **Steps to fight air pollution must be central to any work that targets energy and global warming.**

We represent a group of public health and environmental organizations<sup>1</sup> recommending steps to save lives and protect the air we breathe. These steps will improve the health of millions of people across the nation, save thousands of lives, protect ecosystems and reduce the impact on the nation's most precious places.

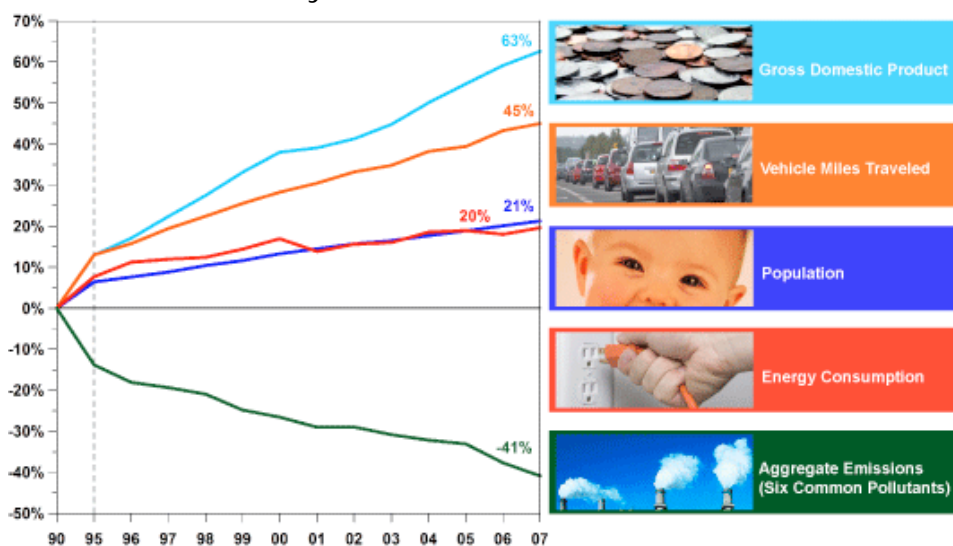
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<sup>1</sup> A list of all groups is included on the last page.

## Great Progress, Great Needs

Clean air remains one of our nation's great public health and environmental challenges. Since 1990, emissions of the six most widespread and dangerous air pollutants have dropped by over 40 percent, all while the economy, population, and energy use have grown, as shown in this EPA chart, below.<sup>2</sup> However, well over 150 million Americans live in areas with unhealthy levels of one or more of these pollutants.<sup>3</sup>

Furthermore, this chart reveals two important lessons. First, cleaning the air does not hurt economic growth, despite the repeated claims by polluters. Even in these days of severe economic challenge, we must continue to reduce air pollution. Second, rapid growth continued in the



consumption of energy and in the annual number of miles that Americans drive. The steps taken to reduce air pollution did not prevent urban sprawl or reduce energy consumption. **Progress towards one goal does not automatically ensure progress towards the other goals.**

Some steps do have multiple benefits. Greater use of energy conservation would have reaped even greater public health and climate benefits. Had the nation incorporated stronger measures to reduce the demand for electricity in the eastern US, the old, dirty coal-fired power plants could be run less, producing less sulfur dioxide, nitrogen oxide, mercury and carbon dioxide emissions. Further, reducing the most widespread air pollutants can benefit the climate. For example, ozone is a potent greenhouse gas, and black carbon also plays a prominent negative role in climate change.

**Climate, energy and clean air are inexorably linked. Solutions that lead to cleaner air must be included in any approach to cleaner, more efficient energy use and reductions in global warming.**

America must continue to clean up air pollution as it faces these other long-delayed challenges. The life and health for millions and the ecosystem depend on it.

<sup>2</sup> U.S. Environmental Protection Agency. *National Air Quality: Status and Trends Through 2007*. November 2008. Available at <http://www.epa.gov/air/airtrends/2008/index.html>.

<sup>3</sup> U.S. EPA. *National Air Quality Status and Trends through 2007*.

The health risks of air pollutants are well-documented. The list is long—and growing—as is the list of people who face higher risk from air pollution.

### Harm to Health

- Infant deaths
- Low birth weight
- Impaired brain development
- Wheezing & coughing
- Asthma attacks
- Lower lung function
- Higher risk of infection
- Heart attacks and strokes
- Premature death

### People At Risk

- Infants and children
- Teens
- Pregnant women
- Older Adults
- People with Lung Disease, including Asthma, COPD
- People with Cardiovascular Disease
- Diabetics

The impacts to the environment are also widespread and well-documented.

### Harm to the Environment

- Acid Rain
- Mercury contamination of wildlife
- Ozone "burning" of foilage
- Suffocation of aquatic life
- Obliterated scenic vistas

### Places at Risk

- National Parks , wildernesses and refuges
- Forests, fish and wildlife
- Rivers and lakes
- Bays and estuaries

## The law and the science: Too often ignored, neglected—or subverted

Since 1970, the Clean Air Act has driven the achievements made in air pollution reduction. However, the rules have eroded, as political decisions took the place of scientific ones, and delay after delay undermined enforcement of the law. Below are just a few examples of the systemic breakdown in carrying out the nation's clean air laws:

- The Bush White House and the EPA set national air standards for ozone that ignored the unanimous agreement among the independent scientific advisory

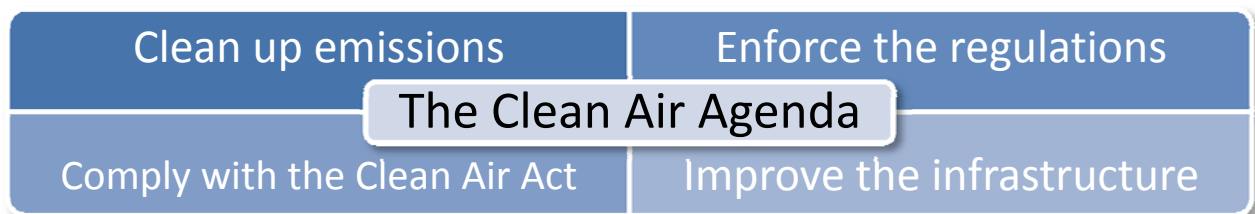
committee on the need for much more protective new standards, despite the Clean Air Act's clear requirements to establish science-based standards that protect public health. This came on the heels of similar dismissal of the committee's near-unanimous recommendations on particulate matter.

- The Bush Administration tried to weaken provisions of the Clean Air Act by issuing regulations that would have allowed large pollution sources to expand and emit more pollution without pollution control measures. After the courts tossed out some of these regulations, the EPA persisted in weakening these same safeguards in the form of two new midnight regulations issued in January 2009.<sup>4</sup>
- The Bush Administration EPA created harmful exemptions for heavily polluted areas that would have allowed polluters to do nothing to reduce emissions. The courts called that illegal and ordered EPA to strengthen its rules.

The list is much longer, but these few examples show the continued pattern of pursuing delays, ignoring the science, and trying to weaken clean air safeguards. By restoring a commitment to science and law, the nation can make great strides in protecting human health and the environment from air pollution.

## The Clean Air Agenda

In late 2008, public health and environmental groups began preparing for the transition to a new administration. The groups compiled this list of measures that would help ensure that America can protect the air everyone breathes, as the nation invests in clean energy solutions and reduces global warming.



### Clean up emissions

**Clean up coal-fired power plants, a major source of air pollution.** Action should be taken immediately to reduce nationwide power plant emissions of sulfur

<sup>4</sup> The two examples cited here are changes to the New Source Review aggregation rule and the New Source Review fugitive emissions rule, issued in December, 2008 and up to the morning of January 20, 2009. For more information, go to [www.epa.gov/nsr/actions.html](http://www.epa.gov/nsr/actions.html).

dioxide, nitrogen oxides, and air toxics including mercury to levels sufficient to solve these public health and environmental threats once and for all. Coal-fired power plants are among the largest contributors to particulate matter, ozone, toxics including mercury, lead and arsenic, as well as global warming pollution. An analysis released in 2004 attributed 24,000 premature deaths *each year* to power plant pollution, as well as tens of thousands of asthma attacks, hospital admissions and emergency room visits.<sup>5</sup> Greater reductions in power plant pollution levels are essential to enable states and local governments to reduce air pollution to safe levels. Carbon dioxide emissions are a primary global warming concern, and coal-fired power plants contribute to the formation of ozone, itself a potent climate change pollutant, and to particulate matter. Through smart policies, the nation must ensure that measures to cut global warming pollution will reduce these other emissions as well.

Industrial, commercial, and institutional boilers must also be subjected to strong emission limits for fine particles, ozone-forming pollutants and air toxics.

**Prevent major new power plants and factories from making air quality worse.** A rule adopted in the last year of the Bush Administration will allow huge new power plants and factories to be built for the next three years even where they will cause or contribute to violation of clean air health standards for fine particulate matter (PM<sub>2.5</sub>). The rule also waives regulation of “condensable” PM<sub>2.5</sub>—the lion’s share of PM<sub>2.5</sub> emissions. These illegal waivers, adopted without public notice or comment opportunity, will needlessly allow exposure of millions of people to air pollution levels linked to premature deaths, serious lung and heart disease, and other severe health impacts. And once built, these plants will continue to pollute for decades. EPA should immediately reconsider and overturn these harmful illegal actions.

EPA also needs to adopt long overdue “increments,” or caps, on increases in PM<sub>2.5</sub> pollution in areas currently meeting standards. The Bush Administration proposed such increments, but the proposal is marred by illegal exemptions and loopholes that would effectively waive compliance with the increments and allow new plants to violate clean air standards. EPA must reject these illegal exemptions, which threaten public health and welfare throughout much of the nation. The agency must also reject the prior administration’s illegal proposal to repeal increments for PM<sub>10</sub> that provide important additional protection for health and the environment.

**Clean up ocean-going vessels.** Ocean-going vessels, like cruise ships, container ships and tankers deliver staggering amounts of smog-forming oxides of nitrogen,

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<sup>5</sup> Abt Associates. *Power Plant Emissions: Particulate Matter-Related Health Damages and the Benefits of Alternative Emission Reduction Scenarios for the Clean Air Task Force*. June 2004. Available at [www.catf.us](http://www.catf.us).



particle pollution, including the global warming pollutant black carbon, sulfur dioxide, and heat-trapping carbon dioxide. By 2030 these vessels will produce approximately 45 percent of the national inventory of mobile source fine particulate emissions, harming health, worsening global warming and creating acid rain. New evidence shows that pollution from these vessels reaches parts of the country far inland from the 40 port cities that have recognized air pollution problems. The U.S. Government must promptly submit a request to create an Emissions Control Area in American waters, including Alaska and Hawaii, to maximize the clean air protections under international agreements, carrying out faster and deeper cuts in particulate- and smog-forming pollutants.

**Clean up the existing fleet of dirty diesel vehicles and heavy equipment.**

Rules EPA put in effect over the past several years mean that new diesel vehicles and equipment must be much cleaner. Still, the vast majority of the diesel fleet will likely be in use for thousands more miles, spewing dangerous diesel exhaust into communities and neighborhoods. The good news is that affordable technology exists to virtually eliminate this problem. Congress should fully fund programs to retrofit diesel trucks, buses, heavy equipment (such as tractors and bulldozers) and other existing sources of dirty diesel exhaust. Funding and requirements for these retrofits should be part of federal transportation funding. The economic recovery legislation invests \$300 million at EPA for the voluntary diesel retrofit program. Further, EPA should require that long-haul trucks upgrade their emissions controls whenever their engines are rebuilt, similar to new requirements that just went into effect for locomotive and marine diesel engines.

**Clean up cars, light trucks, and SUVs.** Beginning in the 1970s, the EPA has taken periodic steps to reduce motor vehicle emissions, one of the largest sources of pollution nationwide. Cleaner engines are clearly possible under existing technology. Not only does the public need these pollution reductions to protect health, but the states need these emission reductions to meet their requirements to attain the national air quality standards and restore healthy air. In 2009, EPA should cut light duty vehicle nitrogen oxide emissions in half starting with Model Year 2012, and regulate particulate emissions from gasoline vehicles. EPA should eliminate sulfur in gasoline and cap sulfur levels at no more than 5 ppm at the pump.

**Reduce emissions of wood smoke.** Residential wood smoke contains many toxic air emissions and contributes 420,000 tons of direct PM<sub>2.5</sub> emissions each year. EPA estimates that nearly 80 percent of those emissions come from the roughly 10 million units currently in use, most of which do not meet the 1988 EPA standards.<sup>6</sup>

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<sup>6</sup> Air Quality Management Work Group, Recommendations to the Clean Air Act Advisory Committee. January 2005. P. 23. Available at <http://www.epa.gov/air/caaac/aqm/report1-17-05.pdf>.

Some communities, especially some Tribes, are particularly affected by wood smoke and must reduce wood smoke to meet the new 24-hour PM<sub>2.5</sub> standard. EPA has operated a voluntary wood stove change-out program since 2004, and should use that experience to provide guidance to the states to help them implement similar programs. EPA also needs to update its 1988 New Source Performance Standards (NSPS) for wood stoves to reduce emissions and improve efficiency in the future. Furthermore, current federal regulations do not require sufficient emission reductions from other wood burning devices, including outdoor wood boilers (hydronic heaters) or small commercial or institutional wood boilers. These products are marketed as a way to reduce fuel costs and, too often, have replaced natural gas-fired boilers that were much cleaner. A voluntary program has helped to move manufacturers in the right direction, but EPA must begin to require that the manufacturers build lower emitting devices and stop selling the new boilers that use the old, dirty technology.

**End amnesty for factory farms.** Large confined animal feeding operations (or factory farms) can be significant sources of ammonia, hydrogen sulfide and other noxious pollutants. The Bush Administration blocked efforts to require such operations to monitor and report their emissions, and instead granted this industry amnesty from the Clean Air Act and “right to know” laws, pending completion of a voluntary study of emissions at a handful of facilities. Study results are due in 2009. Meanwhile, however, the Bush Administration finalized a rule eliminating these requirements for these polluters altogether. The Obama Administration should reverse that decision as soon as possible. EPA should publish the data that has already been collected, end the amnesty program, and start enforcing the law. The initiative will have significant support in rural communities, which have been impacted by pollution from factory farms.

**Protect national parks and forests from pollution from nearby development.** To keep air in national parks and forests relatively clean in the face of increasing development outside their boundaries, Congress established ceilings on additional amounts of pollution over baseline conditions that existed in 1977. Known as “increments,” these pollution ceilings are intended to allow some growth in emissions from new development near national parks and forests, but not so much as to make their air unacceptably dirty. The increments established for nitrogen oxides and sulfur dioxide have proven inadequate to protect national park and forest ecosystems, which continue to suffer significant damage from acid rain. Scientists and policy-makers have called for the establishment of science-based “critical loads” that limit the amount of pollutants that are deposited to prevent harm to natural systems.

**Prevent increases in air pollution from alternative energy choices.** The combustion of fossil fuels for energy forms the largest block of human-generated



air pollution. Some alternatives to reduce the use of fossil fuels or to reduce our use of foreign oil have a mixed impact on air pollution or can even increase emissions. For example, low levels of ethanol incorporated into fuel can actually increase the ozone in a community and the conversion of coal to liquid fuels can result in a suite of harmful airborne contaminants. The full life-cycle of fuel production needs to be considered in evaluating the impact on air pollution, global warming or energy. For instance, the choice of raw materials and the method of production may increase the emissions.

## **Enforce the regulations against polluters**

**Insulate enforcement from politics.** EPA's new leadership should resurrect a policy that prohibits communication about enforcement cases with outside parties unless enforcement counsel is present. Reissuing this policy would signal that political interference with enforcement actions will not be tolerated. The same announcement should also make clear that the Agency will enforce the laws as they are written in a nonpartisan manner, and not be guided by political concerns or new policies that lack the force of law.

**Invest strategically in enforcement.** Resources will be limited, but even a small move to increase the allocation for enforcement will be a welcome sign—one of the Bush Administration's first actions upon taking power was to propose a drastic reduction in the EPA enforcement staff (an action that was ultimately rejected by Congress). The enforcement program's contract and travel budget has shrunk in recent years, limiting the ability of enforcement staff to get out on site, conduct lab analyses, and investigate compliance. An increased appropriation (e.g., \$3 million) would go a long way, as would the addition of 15 or 20 full time employees. The budget could specify that additional funds should be used to hire the kind of investigators and experts that EPA needs to develop cases.

**Target TVA and other power plants.** The Administration should pursue existing "New Source Review" cases against some of the nation's largest utilities. The Justice Department has previously refused to pursue a judicial enforcement action against TVA, based on its long-standing "unitary executive" theory that supposedly prevents the department from suing other federal agencies. However, decisions from both the 4th and 11th Circuits establish that TVA is not immune from suit. Given these decisions and the fact that TVA is one of the largest sources of air pollution in the Southeast, Administrator Jackson should instruct the Justice Department to bring an action against TVA in federal court for violations of the Clean Air Act.

In addition, several cases referred by EPA to the Justice Department during the Bush Administration were placed on hold due to that administration's efforts to

undermine NSR enforcement via regulatory changes. Those regulations are no longer effective and these cases are ripe for filing. The EPA needs to immediately instruct the Justice Department to bring enforcement actions on the remaining cases.

**Audit and repair EPA's regional enforcement system.** Most enforcement resources are housed in EPA's ten regional offices. The quality and commitment of regional programs vary widely, for a variety of reasons that include lack of support for strong enforcement in some regions, and a critical shortage of technical and legal expertise in others. Enforcement programs are organized differently in each regional office, and report directly to the Regional Administrator, rather than to enforcement headquarters. New EPA leadership should conduct an audit of regional capacity and effectiveness, and remedy the problems identified through strategic hiring, resource allocation and management decisions. This is a critical problem that will continue to hamper enforcement's effectiveness if it is not addressed.

**Speed up the enforcement process.** Justice delayed is justice denied, and that may be especially true in environmental cases, where delay can leave the public exposed to dangerous levels of illegal pollution for many years after the date for complying with environmental laws and standards has passed. Almost every enforcement case eventually settles, but the negotiations can plod on for years (more than 8 years for some New Source Review cases). The Obama Administration should make it a priority to bring these cases to quick conclusion, and make violators assume the cost of delay. For example, penalty assessments could include a provision to recover the government's costs in prosecuting civil or criminal cases. Any amounts recovered would be returned to the U.S. Treasury, and not directly to EPA or the Justice Department, to avoid conflict with the Appropriations Act. Violators would have an incentive to settle, knowing that delay could significantly increase penalties.

## Comply with the Clean Air Act

**Restore scientific integrity to the standard-setting process.** Central to the Clean Air Act are the National Ambient Air Quality Standards, which define what constitutes air that is healthy to breathe and safe for the environment for the most common and widespread air pollutants. The standards establish the health-based framework for the states' pollution control plans and drive much of EPA's air pollution regulation. The Bush Administration rewrote the process for setting the standards, adding redundant layers and political interference to the process, shuttering the expert opinions of the EPA staff scientists and reducing the opportunity for transparent scientific deliberations between these scientists and the independent Clean Air Scientific Advisory Committee (CASAC). The Obama

Administration should return the staff recommendations to the public process, while still reserving the appropriate policy decisions for the Administrator, as the law requires. This can be done by either reinstating the former "Staff Paper" or by adding staff recommendations to the Risk and Environmental Assessment. The process should also return the CASAC to its proper role as scientific partner in the review. One easily-completed improvement is to drop the advanced notice of proposed rule-making (ANPR), a bureaucratic layer which has added nothing to the product but delay.

**Strengthen the 2008 ozone standards.** The EPA issued new national air quality standards for ozone in March 2008. Unfortunately, the Bush Administration chose to disregard the unanimous recommendations of the CASAC and adopted standards that fail to meet the requirements of the Clean Air Act, including a decision by the President himself to overturn recommendations from key EPA staff for stronger protections for forests, vegetation and natural systems. These standards are still in the early stage of implementation and have been challenged in court by states, public health and environmental groups. The EPA should accept a voluntary remand of its March rule, and issue a new rule that meets the recommendations of the CASAC and the nation's leading public health organizations. And the Agency should adopt a secondary ozone standard consistent with recommendations of CASAC and the National Park Service to protect plant life and forested ecosystems. A voluntary remand can be designed to maintain clean air progress while transitioning to more protective standards.

**Strengthen the particulate matter standard.** Fine particulate air pollution (PM<sub>2.5</sub>) is responsible for tens of thousands of premature deaths each year in the U.S., as well as a cascade of other adverse health effects ranging from increased hospitalization and emergency room visits to decreased lung function in children. Scientific studies show that long-term exposures to fine particles can shorten life by months to years. In addition, one kind of fine particle, black carbon, has been shown to be the second most important contributor to global warming and a major factor in the melting of glacial and Arctic ice and snow. In 2006, EPA failed to strengthen the annual standard for fine particles, despite the near unanimous recommendation of the Clean Air Scientific Advisory Committee. On February 24, 2009, the U.S. Court of Appeals ruled that the 2006 clean air standards were deficient, sending them back to EPA for corrective action. EPA can save thousands of lives each year by moving swiftly to dramatically strengthen the annual average standard.

**Require all appropriate counties to clean up fine particulate matter.** A key step to reducing the burden of air pollution around the nation is EPA officially determining where air pollution poses a threat to public health. The EPA issues a formal rule listing the counties that fail to meet or "attain" the national air quality

standards. The counties that violate the standards (“nonattainment” areas) must take steps to reduce emissions and meet the standards by a certain date. Historically, that process has fallen short in failing to include areas with unhealthy pollution levels. In December 2008, the EPA failed to take any action to designate counties that had violated the annual standard for fine particulates (PM<sub>2.5</sub>), a pollutant found to increase the risk of premature death. EPA’s most egregious omission was Houston, where EPA’s own calculations show that the year-round level of PM<sub>2.5</sub> are growing and clearly violate the standard. This omission means that the Houston area will not have to reduce its PM<sub>2.5</sub> pollution to restore healthy air. EPA also failed to designate many other counties that should have been included in the list of those not meeting the 24-hour PM<sub>2.5</sub> standard. EPA currently has the final rule held for review by the Obama Administration. EPA should revise the final rule to include a commitment to promptly make nonattainment designations for the annual standard and designate all appropriate counties for the 24-hour standard.

**Enforce the law’s mandates for state plans to reduce regional haze.** The 1977 Clean Air Act amendments declared the national goal of restoring clean air to national parks and wilderness areas. Unfortunately, implementation has lagged far behind and clean air progress has been sluggish. For example, current rules give the states until 2060 to restore clean air to these areas. States across the country were required to submit detailed plans to cut the haze obscuring America’s crown jewels by December 2007. On January 15, 2009, EPA published its official finding that 37 states, the District of Columbia and the Virgin Islands failed to submit clean air plans for protecting America’s national parks and wilderness areas.<sup>7</sup> Within two years, EPA must enforce the law and develop a federal plan for delinquent states to require the “best available retrofit technology” at power plants and major industrial sources and comprehensive measures to clean the air in our national parks.

**Regularly review and adopt national air quality standards that protect health and the environment.** The Clean Air Act tells EPA to base the national air quality standards strictly on the science, a declaration affirmed in a unanimous Supreme Court decision in 2001. The Act requires that EPA regularly review the science and the standards. Despite that, the reviews rarely happen on time and too rarely follow the science, endangering the health of the public and the environment. Currently under review are the standards for sulfur dioxide (SO<sub>2</sub>) and nitrogen dioxide (NO<sub>2</sub>), which have not been updated since 1971. Short-term standards for both pollutants are urgently needed to protect public health (primary standards) and the environment (secondary standards). Short-term exposure—even for one hour—to SO<sub>2</sub> and NO<sub>2</sub> places people with asthma at higher risk for asthma attacks and need of medical care. The primary SO<sub>2</sub> and NO<sub>2</sub> standards must protect against

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<sup>7</sup> 74 *Federal Register* 10: 2392-2395.

these spikes. SO<sub>2</sub> and NO<sub>2</sub> are prime contributors to the acidification of lakes, streams and forests. The secondary standards to protect the environment should be based on critical load deposition limits that protect the most sensitive ecosystems. To get the Agency to act, organizations have had to take legal action, as is the case with these two reviews. Under the court order, the EPA must propose the NO<sub>2</sub> standards by May 28, 2009 and the SO<sub>2</sub> standards by July 30, 2009 and secondary standards for both pollutants by October 2010.

**Set implementation guidance that follows the law.** In 2004, the Bush Administration issued rules governing how states were to implement the 1997 ozone standard. Among other things these rules set requirements for the stringency of pollution controls in areas violating the new standard. In December 2006, the court ruled unanimously against EPA for its failure to follow the Clean Air Act requirements in these rules. All industry appeals failed. Now, two years later, EPA has still not developed rules to replace those thrown out by the court. Complicating this is the need to help the states prepare to meet the tighter 2008 ozone standard. The Obama Administration needs to push to get guidance that meets the legal requirements out to the states as soon as possible. A second set of rules to implement the ozone standard is currently the subject of a court challenge by environmental groups, as are rules to implement the fine particle standards. One of these rules allows major power plants and factories to spew out pollution without any emission controls at all in communities with unhealthy air, as long as the plant buys emission credits from factories that can be as much as 1000 miles away. Another allows construction of huge new power plants that will cause or contribute to violation of fine particle health standards. These Bush-era rules all suffer from the same basic type of flaw: waiver or weakening of clear statutory mandates for pollution control. The Obama Administration should make full implementation of the Clean Air Act's requirements its guiding principle, rather than resorting to the exemptions and "flexibility" approaches used by the prior administration to circumvent the law.

**Control Air Toxics Emissions.** Power plants, cement plants, chemical plants and other major industrial facilities emit vast quantities of mercury, lead, arsenic, dioxins, polychlorinated biphenyls and other highly toxic substances that can cause cancer, birth defects and other devastating health effects. Congress mandated highly protective standards for these pollutants, but the standards EPA has set fall far below legal requirements. EPA needs to redo its outdated and unlawful standards for air toxics to ensure that they reduce emissions by the maximum degree that is achievable and adequately protect public health.

## Improve the Clean Air Infrastructure

**Improve the decaying monitoring network.** The nation's network of air pollution monitors forms the infrastructure that enables us to protect our health and our environment. Monitors provide the most reliable and consistent information on air pollution in our communities and in our national parks. Monitoring tracks both the levels of pollution in the outside air as well as emissions from specific sources. Monitoring also enables policymakers and the public to see what measures are effective and where air quality management efforts have fallen short.

Unfortunately, states have recently had to reduce their already limited existing network of monitors and staff to accommodate cuts in funding. However, even before those cuts, the monitoring network had been reduced, weakening the ability to identify air pollution problems and track emissions. Further, emerging science warns that the air quality in areas with no monitoring carries serious health risks, like the areas adjacent to major highways or in poorer neighborhoods. Without monitors in place, pollution in those areas will not be tracked and effectively reduced. To protect populations at risk and to assess the efficacy of pollution control programs, EPA must work with scientists and state officials to lower the costs of monitoring and expand its reach. To protect our nation's outdoor treasures, the National Park Service should implement monitoring of all major air pollutants in every one of the national parks that the Clean Air Act afforded special protection (the "Class I" parks).

### **Increase significantly federal grants for state and local air pollution work.**

State and local air pollution agencies monitor emissions, inspect sources of pollution, oversee and enforce laws, and develop specific strategies to reduce air pollution and protect the health of their communities. The Clean Air Act authorizes the federal government to provide grants of up to 60 percent of the cost of state and local air quality programs, while state and local agencies must match most programs up to 40 percent. The estimated federal funding needed for the state and local air pollution control programs is \$600 million annually. However, recent appropriations have totaled \$200 million to \$220 million—far short of what is needed.<sup>8</sup> Now, drastic cuts in state and local government budgets mean that some states face still greater compromises in their ability to protect and improve air quality.<sup>9</sup> State and local air quality programs need substantial increases in federal funding to protect the health of everyone in their communities.

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<sup>8</sup> National Association of Clean Air Agencies, *Change is in the Air: Recommendations from the National Association of Clean Air Agencies to President-Elect Obama's Administration on Improving Our Nation's Clean Air Program*. December 16, 2008.

<sup>9</sup> Farenthold, David A. "Environmental Protections Take Hit in Fiscal Crunch." *Washington Post*, January 26, 2009. P. B01. <http://www.washingtonpost.com/wp-dyn/content/article/2009/01/25/AR2009012501995.html>.



## **For more information**

For more information, see the contact persons in the groups in support of these recommendations.

## Supporting Organizations

**American Lung Association** [www.lungusa.org](http://www.lungusa.org)

Contact: Paul Billings or Janice Nolen, 202-785-3355

**Appalachian Mountain Club** [www.outdoors.org](http://www.outdoors.org)

Contact: Georgia Murray (603) 466-2721

**Chesapeake Bay Foundation** [www.cbf.org](http://www.cbf.org)

Contact: John Mueller (410) 268-8816

**Clean Air Task Force** [www.catf.us](http://www.catf.us)

Contact: Conrad Schneider (207)721-8676

**Clean Air Watch** [www.cleanairwatch.org](http://www.cleanairwatch.org)

Contact: Frank O'Donnell (202)558-3527

**Earthjustice** [www.earthjustice.org](http://www.earthjustice.org)

Contact: David Baron (202) 667-4500

**Environmental Defense Fund** [www.edf.org](http://www.edf.org)

Contact: Vickie Patton (303) 440-4901

**Environmental Integrity Project** [www.environmentalintegrity.org](http://www.environmentalintegrity.org)

Contact: Eric Schaeffer (202)296-8800

**National Parks Conservation Association** [www.npca.org](http://www.npca.org)

Contact: Mark Wenzler (202) 454-3335

**Natural Resources Defense Council** [www.nrdc.org](http://www.nrdc.org)

Contact: John Walke (202) 289-2406

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