

August 8, 2018

Andrew Wheeler
Acting Administrator, USEPA
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Dear Acting Administrator Wheeler:

Those of us signing this letter have each had the honor to lead the US Environmental Protection Agency's Office of Air, the office within EPA responsible for implementing the federal Clean Air Act. Decades of scientific research show that exposure to air pollution causes or exacerbates asthma, heart disease, cancer, and premature death and that reductions in air pollution save lives and improve daily quality of life for millions of Americans. We worked for both democratic and republican administrations, and are proud of the progress this country has made towards cleaner air.

As your time as Acting Administrator begins, you have the opportunity to clearly set the direction of the agency and return to its core statutory mission of protecting public health. We urge you to take that opportunity, and any of us would be happy to talk with you further about the issues we raise in this letter.

In the 1960s and 70s, this country realized that the waste products associated with an industrial economy endangered clean air and water. In 1970, faced with the kind of smoggy skies most Americans alive today have never seen in our country, Congress recognized as national policy the importance of clean air to this country's health and economic vitality. It established the USEPA to implement the Clean Air Act and other foundational public health laws. In the 1970 Clean Air Act, and then again in 1990, it established safeguards to ensure that no matter where you live in this country, the air you breathe should not make you sick.

In both 1970 and 1990, Congress, and the republican presidents who signed the laws, recognized three important things:

- Protecting public health is neither partisan nor political, and must be based on good science. Setting a standard for healthy air is not a matter of opinion, no more than determining a healthy blood pressure or cholesterol level.
- Science is always improving. As our scientific knowledge improves, we understand more about how air pollution affects human health and ecosystems, and we may need to change how we define healthy air. As technology improves, we are able to reduce or prevent harmful air emissions more efficiently and at lower cost. With the Clean Air Act,

Congress wisely recognized that EPA should review its rules regularly so they would reflect current science.

- Congress wisely told EPA to set health standards on health science alone and it told EPA to take cost and other impacts into account as we work to meet the scientifically established goal of clean and healthy air. Thus, the Clean Air Act requires USEPA to consider the state of technology, the cost to business, potentially adverse impacts on water, energy, and other issues as well as the impacts on human health and the environment, as it carries out the law.

These foundational principles seem to be lost in recent rhetoric that is trying to make Americans believe that an agency founded to protect Americans from smog, polluted drinking water and hazardous waste in their communities, is somehow an enemy of the American people and our economy.

All of us realize that improvements can be made to programs that have been put in place as we learn from implementation, facts on the ground change and new technology is developed. In that spirit we have looked at the many Trump Administration Clean Air Act proposals and policies announced under the Clean Air Act since January 2017, including the most recent proposal to freeze fuel economy and tailpipe CO₂ standards. We are hard pressed to find a single one that finds a different or better way to reduce air pollution. Some, like the effort to restore the loophole for super-polluting glider trucks, will unquestionably lead to more public health impacts.

One of the areas that requires strong attention and can always benefit from new thinking is the challenge to reduce carbon and methane emissions. The proposals we have seen, rather than finding better ways to meet the challenge, are stepping back from addressing harmful carbon pollution. The time invested in stepping back and the litigation likely to follow will impair our nation's ability to deal with the inevitable hardships that are coming with a changed climate—hotter temperatures, more violent storms and flooding, more drought and wildfires. Again, the recent proposal on tailpipe and fuel standards is a compelling example. By all accounts, the auto industry, the state of California and other stakeholders are willing to discuss flexibilities and adjustments that will allow the industry to make continued progress towards cleaner, more efficient vehicles and improved public health, safety and economic vitality. We urge you to advocate strongly for those discussions to take place, constructively, before any final determination is made.

Other policies that are focused on improving the efficient implementation of key Clean Air Act programs must find a balance between streamlining and adequate oversight. We have to take care to not undermine the architecture that has enabled EPA to deliver cleaner air to all Americans without adversely affecting the economy over the past fifty years.

While in office, each one of us was exposed to strong advocacy from the full range of stakeholders interested in EPA's air quality work and did our best to make decisions that reflected thoughtful consideration of all viewpoints, an objective factual record, and EPA's

public health mission and statutory responsibilities. As you assume leadership, we urge you to reconsider some of the proposals that seem to be motivated by a reckless drive to de-regulate, no matter the cost, or in response to requests by industries or individuals motivated by their own bottom line or political leanings, not by what is best for the American people.

Thank you for your consideration of these issues, and please contact any of us if you would like to discuss them further.

Sincerely yours,

/s/

Roger Strelow, 1974-1977

David Hawkins, 1977-1981

Bob Perciasepe, 1998-2001

Gina McCarthy, 2009-2013

Janet McCabe (Acting), 2013-2017

Cc: Bill Wehrum, OAR