

Congress of the United States
Washington, DC 20515

July 10, 2023

The Honorable Michael S. Regan
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Dear Administrator Regan,

As you consider the revisions to the National Ambient Air Quality Standards (NAAQS) for particulate matter (PM) 2.5, we request you take into consideration numerous factors that are unique to Arizona and the direct economic impacts to the Arizona economy associated with the PM2.5 standard.

We urge the Environmental Protection Agency (EPA) to consider the challenges, especially in Arizona, to achieve the NAAQS that are outside of air agencies' control. Specifically, Arizona is concerned about two potential issues: exceptional events due to wildfire and international transport.

As a dry, desert state, Arizona is concerned about the impact of wildfire on air quality. Arizona, along with other western states, is experiencing an increase in severe wildfires, which presents a significant challenge to air quality in the western U.S.

Therefore, the EPA should consider additional methods to streamline exceptional event demonstrations related to wildfire events. According to the Arizona Department of Environmental Quality (ADEQ), submitting exceptional event demonstrations is a resource- and time-intensive process for both the State and the EPA. With a lowered annual PM2.5 standard, ADEQ believes that the regulatory burden will increase.

Additionally, we are concerned about the impact of a changed PM2.5 NAAQS on border communities. If the NAAQS is lowered, communities along the U.S.-Mexico border will face significant challenges in meeting the new standard due to the lack of similar environmental standards in Mexico. We demand that the final standard selected by the EPA be more sensitive to international air pollution.

Finally, at a time of economic uncertainty and record inflation, the EPA's PM2.5 proposal will increase costs for businesses and consumers. The EPA's own analysis projects that the application of emission controls necessary for compliance with the new rule will cost industry

billions of dollars annually. These are resources better utilized by businesses to expand facilities, hire employees, and invest in research and development.

Unfortunately, the EPA's new one-size-fits-all proposal threatens to punish states like Arizona. The fact is, air quality in Arizona, and nationwide, has made tremendous strides in recent decades. According to the EPA itself, the prevalence of six common NAAQS pollutants declined by 78% between 1970 and 2020. PM2.5 levels have dropped 44% since 2000.

Arizona faces unique air quality challenges, including windblown dust in our desert regions, wildfire impacts, as well as proximity to less-regulated emissions sources in Mexico. Some Arizona communities are non-attainment areas under current EPA guidelines. The new rule proposed for PM2.5 takes none of these factors into account.

We urge you to give serious consideration to these factors as you revise the National Ambient Air Quality Standards (NAAQS) for particulate matter (PM) 2.5.

Sincerely,



Debbie Lesko
Member of Congress



Andy Biggs
Member of Congress



Paul A. Gosar
Member of Congress



Eli Crane
Member of Congress



Juan Ciscomani
Member of Congress