



April 20, 2021

Ms. Stephanie Hengesbach
Michigan Department of Environment, Great Lakes and Energy
Air Quality Division, State Implementation Plan Development Unit
P.O. Box 30260
Lansing, Michigan 48909-7760

Dear Ms. Hengesbach,

For the protection of residents from ozone pollution, and as justice for those who have suffered and died from it, we, the 13 undersigned, ask the Michigan Department of Environment, Great Lakes and Energy (EGLE) to withdraw the Exceptional Event Demonstrations for Ground Level Ozone in West Michigan. Alternatively, we request the EPA not concur with EGLE's Exceptional Event Demonstrations. Ultimately, we believe EGLE should be responsible for taking additional actions to protect West Michigan residents from ozone pollution. We support the Allegan, Berrien and Muskegon ozone nonattainment areas being reclassified from marginal to moderate nonattainment given the excessive ozone pollution levels that continue to plague them.

Air pollution weakens our circulatory systems. When we breathe in pollution, we can experience difficulty breathing, damaged airways, asthma exacerbations and susceptibility to lung disease. When our lungs take pollutants into our bloodstream, irregular heartbeats and heart attacks follow. Among those at greatest risk: our children, elderly adults, outdoor workers, people burdened by multiple sources of air pollutants, and residents with circulatory diseases like emphysema or long-term COVID conditions.

In 2019, the [American Thoracic Society](#) found an estimated 132 Michiganders die from air pollution annually. Another 304 or so suffer from grave illness, thousands more are sickened and 313,000 work and school days are lost from those illnesses. The Society ranks Michigan among the 10 deadliest states for air pollution and Allegan, Berrien and Muskegon as its most dangerous counties. These are the very communities that need additional ozone protections, not less.

EGLE makes three claims in its case: 1) Four days' high pollution levels in the ozone nonattainment areas of Allegan, Berrien and Muskegon counties were caused by California and Arizona wildfires, 2) Ozone pollution would have met National Ambient Air Quality Standards absent the wildfires' ozone pollution, and, 3) these

wildfires should be deemed Exceptional Event Demonstrations and should thus not be tallied.

If these wildfires events are accepted as exceptional events, the Allegan and Berrien counties' ozone nonattainment areas would be eligible for attainment status despite pollution in these areas remaining largely unchanged. The ozone design values in 2018 for Allegan and Berrien counties' monitors were 63 and 72 parts per billion respectively. In 2020, they were 73 and 72 parts per billion respectively. If wildfire events were deemed Exceptional Event Demonstrations in Muskegon's nonattainment area, it would be given a one-year extension to meet National Ambient Air Quality Standards. The Muskegon nonattainment area's ozone value in 2020 was 76, the same as it was in 2018. *Ozone values for all three counties have never been below the threshold standard, 70 parts per billion, since 2005.*

Accepting these wildfires as Exceptional Event Demonstrations, and changing the nonattainment statuses within the three counties because of it, would halt additional efforts to lower ozone pollution and result in no progress toward cleaner, healthy air for residents and visitors alike. This filing in questions would be in stark contrast to strong, just precedents the state of Michigan has set in safeguarding public health.

Michigan has become a national, if not international, leader at fighting climate change in the name of human health. It has committed to carbon neutrality by 2050 to reduce pollution from fossil fuels, and the decision has sparked a rapid transition to clean, renewable energy and clean, electric vehicles. It has surely saved lives.

It is also clear that wildfires are no longer extraordinary due to climate change. They occur with more intensity and frequency because of hotter, drier days. If EGLE claims days of wildfire should be Exceptional Event Demonstrations, the state would effectively deny climate change's inevitable, reoccurring effects on society, and it would deny action to be taken on such events as residents suffer from the air pollution the events create.

Furthermore, whether a day can be classified as an "exceptional event" or not does not change the fact ozone levels were above healthy levels and people were harmed because of it. Choosing to discount those days and future days of inevitable wildfire impacts caused by climate change is an injustice and not an argument we should make to avoid cleaning up the air we breathe.

It is our contention that all instances of ozone exceedances must be counted, and we must do everything we can to protect people from its devastating health effects now and in the future, in Allegan, Berrien, Muskegon and in every other Michigan county.

Let us not kick the can down the road. Instead, let us put practices in place to protect the health of vulnerable populations. We urge EGLE to not file an Exceptional Event Determination and instead channel that time and energy into protecting Michigan communities from high ozone days.

Sincerely,

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