

polluting sources..., where emissions can be highly variable.”⁹ *See also Friends of Buckingham*, 947 F.3d at 91 (rejecting state agency’s conclusion that meeting air quality standards justified dismissing environmental justice concerns).

Environmental Justice Communities Are Particularly Vulnerable to Increased Pollution

Environmental justice populations are likely to be “more susceptible to pollution and environmental degradation (e.g., reduced access to health care)...” EPA Guidance at § 5.0. FERC acknowledged in the EIS for the Sabal Trail Pipeline that “it is reasonable to assume that, where African American populations are present, they have an increased risk of experiencing adverse impacts from decreased air quality.” Sabal Trail Final EIS at 3-214. *See also* Atlantic Coast Pipeline Final EIS (Accession No. 20170721-4000) at 4-514 (recognizing that due to “compressor station emissions, African American populations near [a pipeline project] could experience disproportionate health impacts due to their susceptibility to asthma.”); *Friends of Buckingham*, 947 F.3d at 88 (“FERC’s analysis ... outlined all the risks to African Americans from the Compressor Station, e.g., increased risk of asthma and lung cancer, and even noted that African Americans were an ‘especially sensitive’ community for these conditions.”).

In addition, residents of Albany are already overburdened with polluting industrial facilities and infrastructure. *See Sierra Club*, 867 F.3d at 1370 (“A letter to FERC from four members of Georgia’s congressional delegation cites the grim statistics: southern Dougherty County has 259 hazardous-waste facilities, 78 air-polluting facilities, 20 toxic-polluting facilities, and 16 water-polluting facilities.”).

Air Pollution Has Been Linked to Higher Covid-19 Death Rates

Researchers have discovered a link between air pollution and Covid-19 death rates. *See* Xiao Wu et al., *Exposure to air pollution and COVID-19 mortality in the United States* (April 2020).¹⁰ Researchers at the Harvard University T.H. Chan School of Public Health found that an increase of only one microgram per cubic meter in PM_{2.5} is associated with a 15% increase in the Covid-19 death rate.¹¹ The Albany compressor station has the potential to emit 9.14 tons per year of particulate matter (PM₁₀/PM_{2.5}). Sabal Trail Final EIS at 3-257.

⁹ Southwest Pennsylvania Environmental Health Project, Summary on Compressor Stations and Health Impacts 6 (Feb. 24, 2015),

<https://www.environmentalhealthproject.org/sites/default/files/assets/downloads/summary-compressor-station-emissions-and-health-impacts-02.24.2015.pdf>.

¹⁰ https://projects.iq.harvard.edu/files/covid-pm/files/pm_and_covid_mortality.pdf

¹¹ *Id.* *See also* Lisa Friedman, *New Research Links Air Pollution to Higher Coronavirus Death Rates*, N.Y. Times, April 7, 2020, <https://www.nytimes.com/2020/04/07/climate/air-pollution-coronavirus-covid.html> (“Dr. John R. Balmes, a spokesman for the American Lung Association and a professor of medicine at University of California, San Francisco, said the findings were particularly important for hospitals in poor neighborhoods and communities of color....”).