

1 Supplemental Information

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3 Title: Climate Policy Reduces Racial Disparities in Air Pollution from Transportation and Power
4 Generation

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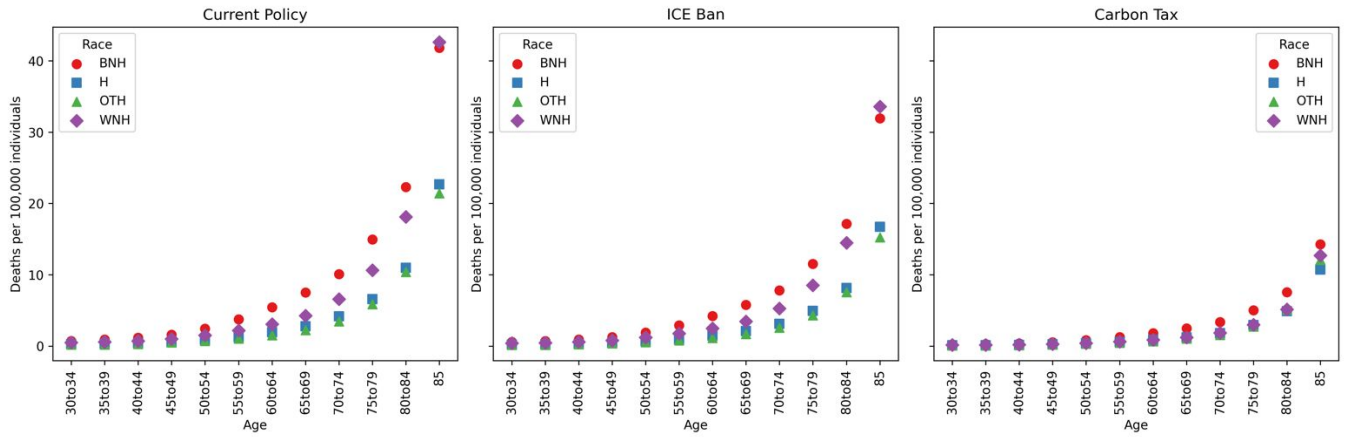
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17 Pages: 20
18 Figures: 7
19 Tables: 5

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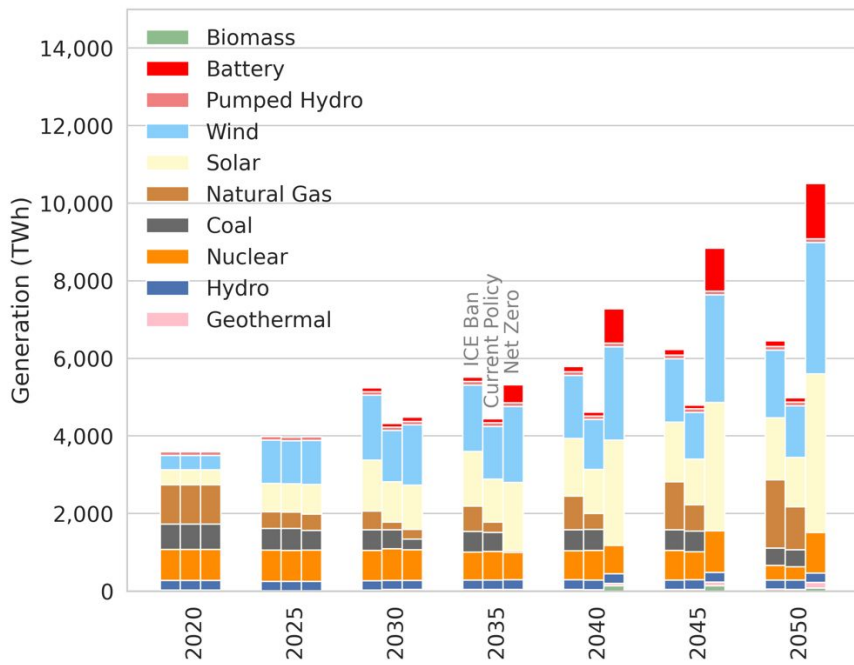
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I. Supplemental Figures

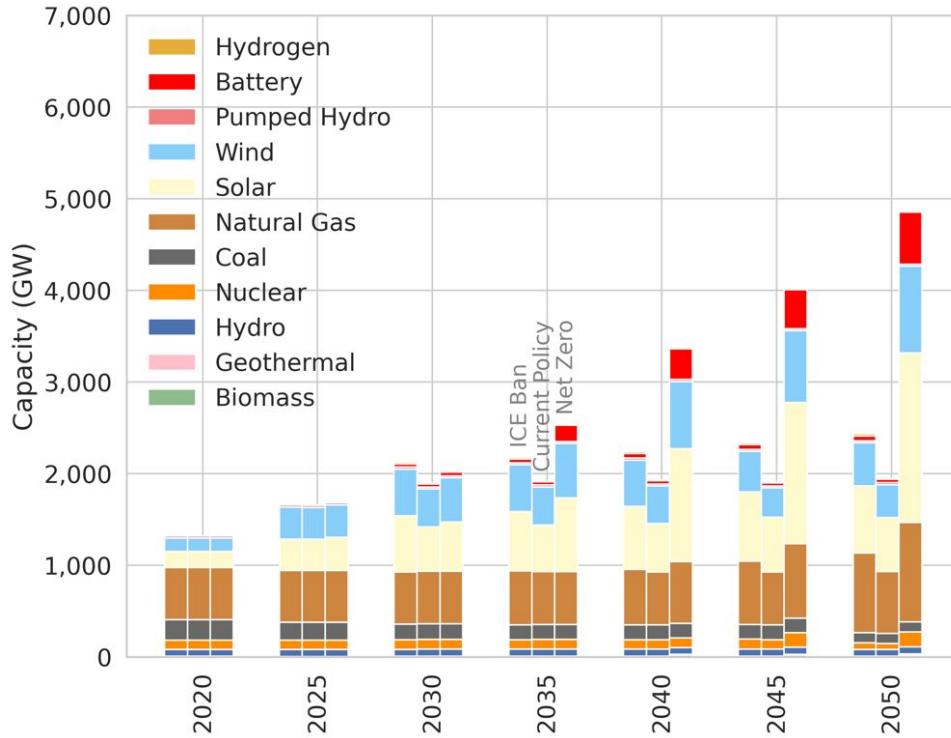


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5 *Figure S.1: Age- and race-specific deaths per 100,000 individuals for three select scenarios.*

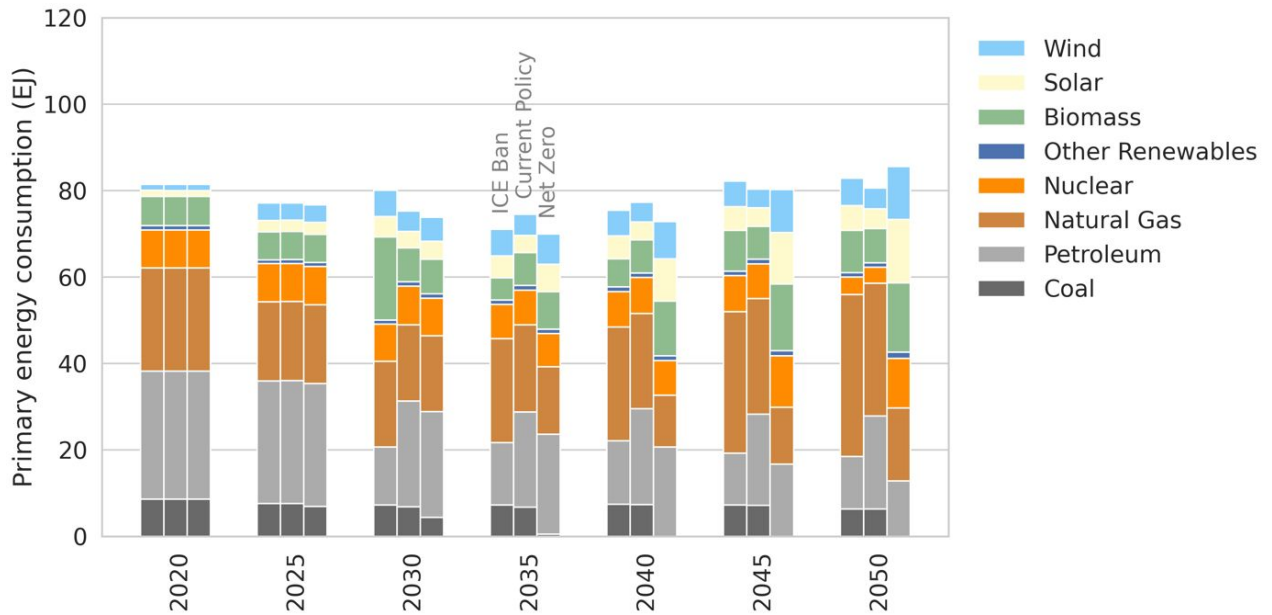
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8 *Figure S.2: Electricity generation by source under the ICE Ban, Current Policy, and Net Zero*
9 *scenarios*



1
2 *Figure S.3: Electric capacity by source under the ICE Ban, Current Policy, and Net Zero*
3 *scenarios*



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5 *Figure S.4: Final energy consumption by source under the ICE Ban, Current Policy, and Net-*
6 *Zero scenarios.*

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1 **II. Details on EGU Downscaling**

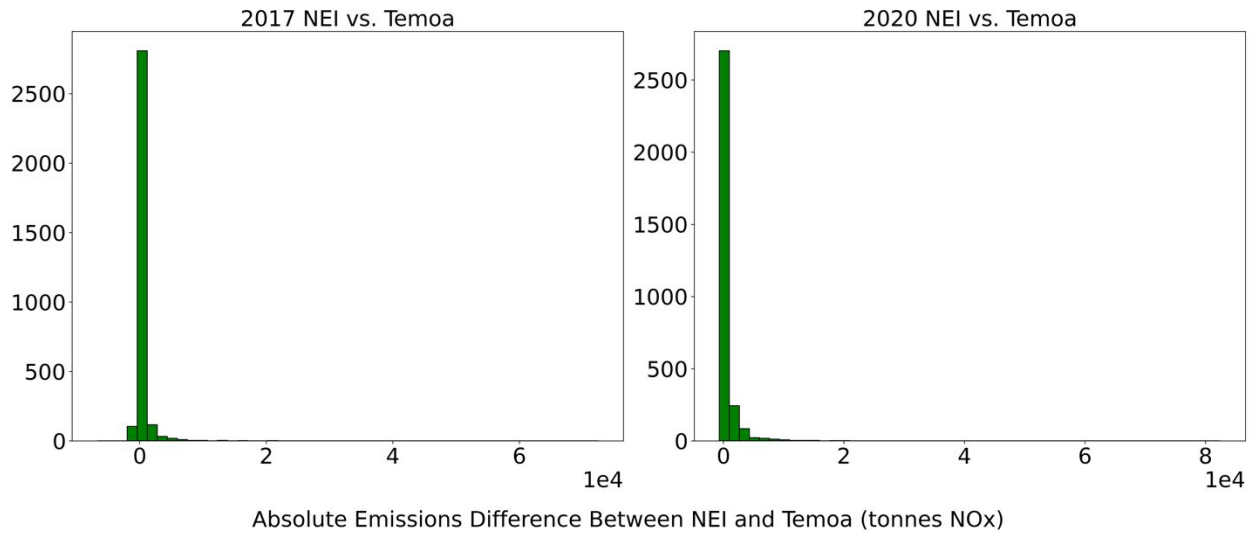
2 To determine the location of future capacity, we implement a grow-in-place heuristic. We
3 use data on planned EGUs and EGUs that have retired since 2002 from December 2021’s Form
4 EIA-860M ‘Monthly Update to Annual Electric Generator Report’ to map existing and planned
5 facilities to Temoa’s capacity ¹. We use this dataset's geographical data, energy source code, and
6 the nameplate capacity (MW) of plants. We then pull new fossil capacity (MW) from Temoa by
7 fuel and cluster. To estimate the new capacity’s location, we pull all planned EGUs in the
8 cluster’s region from Form EIA-860M, irrespective of plant type (combined cycle, combustion
9 turbine, etc.). If the sum of the planned capacity in that region is greater than the new cluster’s
10 capacity from Temoa, we choose a random group of the planned plants whose capacities sum to
11 between 0.75x and 1.25x the capacity required by the Temoa cluster. We assume the new
12 capacity is built at the same sites as this list of planned sites. If planned capacity is insufficient,
13 we repeat the process, adding in retired capacity from the region. If the sum of the planned and
14 retired capacity in the region is less than the new cluster’s capacity, we assign all of the planned
15 and retired plants in that region to the new cluster. This implicitly assumes that some of the new
16 plants will have a higher capacity than planned (if the plant is planned) or than it had when
17 operating (if the plant is retired). We do not have data on average annual generation for the
18 retired or planned plants, so we assume that generation scales with capacity in each cluster. That
19 is, if a plant’s capacity is equal to 5% of the cluster’s total capacity, we assume the new plant
20 generates 5% of the total electricity generated in that cluster.

21 **III. Downscaling Algorithm Evaluation**

22 Models with a multi-decadal time horizon cannot be validated ². However, to better
23 understand the uncertainty present within the downscaling framework, we compare modeled
24 county-level emissions from the transportation and electric sectors to existing data on emissions.
25 This exercise should not be viewed as a direct comparison, but rather as a sanity check on the
26 downscaling method. Temoa’s first time period spans from 2020 to 2024. Even under the
27 Current Policy scenario, Temoa simulates a changing energy landscape. For example, in 2022,
28 US coal-fired powerplants generated 828 TWh of electricity ³. Temoa simulates 654 TWh of
29 coal-fired electricity generation in the first time period. These differences are unsurprising since
30 Temoa assumes a unitary decision-maker and does not account for behavioral and market
31 dynamics that occur in the real world.

32 In this exercise, we compare county-level NO_x emissions in the electric and transportation
33 sectors from Temoa to the EPA’s National Emissions Inventory (NEI) ⁴. The EPA publishes the
34 NEI approximately every three years. The most recent data comes from 2020, but due to effects
35 from COVID-19, 2020 is likely not a representative year. As a result, we compare modeled
36 downscaled emissions to both the 2020 and 2017 NEI. In the electricity sector, we also compare
37 our results to the EPA’s Emissions & Generation Resource Integrated Database (eGRID) ⁵. We
38 compare our results and NEI results to the most recent eGRID release, which contains data from
39 2021.
40

1 Figure S.4 compares Temoa’s simulated on-road transportation emissions to the NEI in 2017
 2 and 2020, showing the absolute difference between the two datasets. We compare NEI results
 3 aggregated to the county-level to our downscaled simulation. In the figures, a positive value
 4 indicates that Temoa projected higher emissions than the NEI reported. We expected Temoa’s
 5 emissions projections to be lower than the 2017 projections due to increased vehicle
 6 electrification and improvements to vehicle efficiency. We anticipated that NEI 2020 emissions
 7 may be lower than Temoa’s simulated emissions due to effects from COVID-19. Figure S.4
 8 shows strong agreement between the NEI and Temoa, with the distribution shifting slightly
 9 between the two NEI data years, in line with our hypotheses.
 10



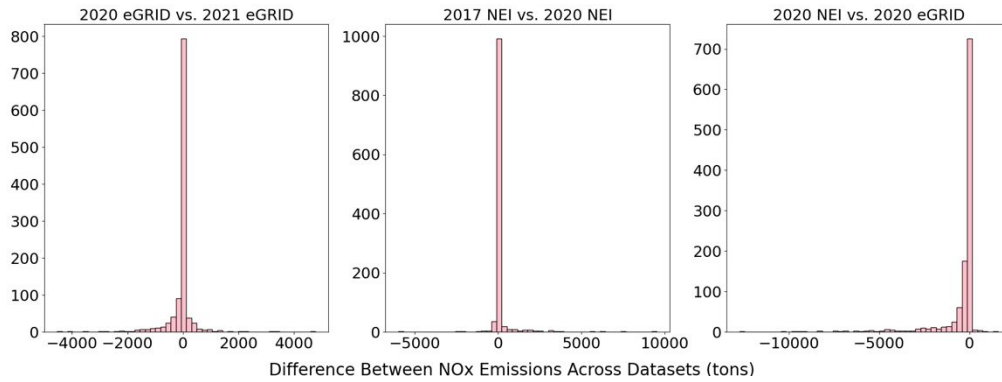
11 Absolute Emissions Difference Between NEI and Temoa (tonnes NO_x)
 12 *Figure S.5: Difference between NO_x emissions reported by the National Emissions Inventory*
 13 *and emissions simulated by Temoa and downscaled to US counties. Emissions reported in metric*
 14 *tons. Left: 2017 NEI vs. Temoa. Right: 2020 NEI vs. Temoa.*

15 Both histograms are centered near zero, indicating broad alignment with the NEI. The
 16 most significant outliers represent counties including Los Angeles and Maricopa counties, where
 17 total emissions are high, so a small percent difference appears large in absolute magnitude.

18 Next, we compare simulated NO_x emissions from electric power generation to reported
 19 emissions from the NEI and eGRID. The NEI and eGRID datasets required some data filtration.
 20 To select only EGUs from the NEI data, we filtered the column ‘naics_description’ to include
 21 only sources described as ‘Fossil Fuel Electric Power Generation’ or ‘Electric Power
 22 Generation.’ We also specified that ‘facility_source_type’ must be ‘Electricity Generation via
 23 Combustion.’ For the eGRID data, while all sources are powerplants, we filtered ‘Plant primary
 24 fuel category’ to include only ‘GAS’ and ‘COAL.’

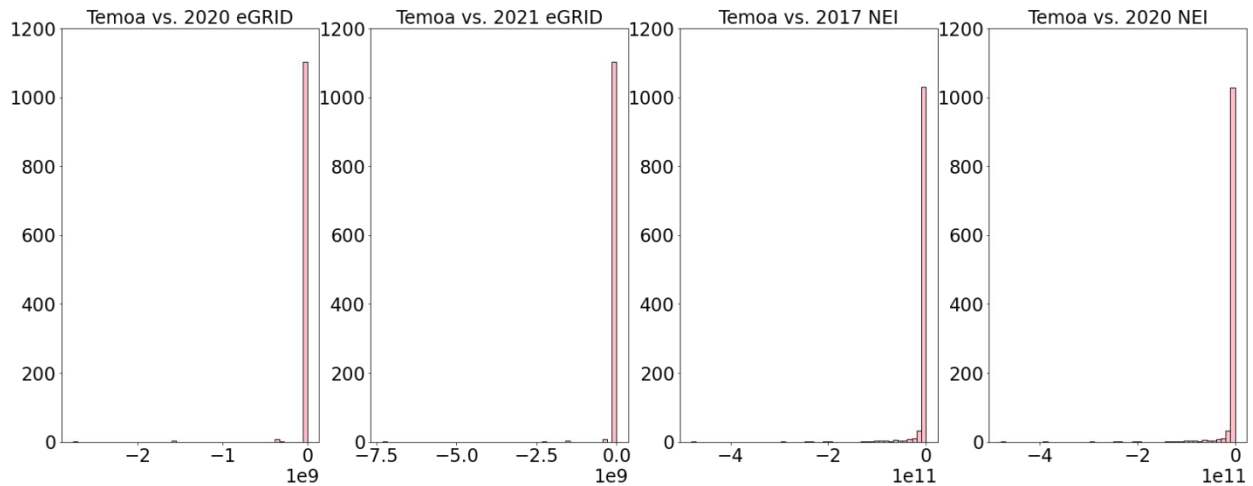
25 We began by comparing the 2017 and 2020 NEI datasets to 2020 and 2021 eGRID to
 26 understand both interannual variability and variability between data sources (Figure S.4). This
 27 inter-dataset comparison reveals two trends. First, in counties where both datasets report
 28 emissions, there is general agreement across datasets and time periods. Second, there are many
 29 counties where either eGRID or NEI reports positive emissions, but not both. Figure S.5
 30 illustrates this trend, showing the distribution of the percent difference between the different
 31 datasets. In order to avoid positive or negative infinities, we replace all 0 values with 1E-4. This

1 leads to large outliers, all of which are displayed in the figure. The top row of Figure S.4 shows
2 the raw data and the bottom row shows a zoomed in version to highlight outliers.
3

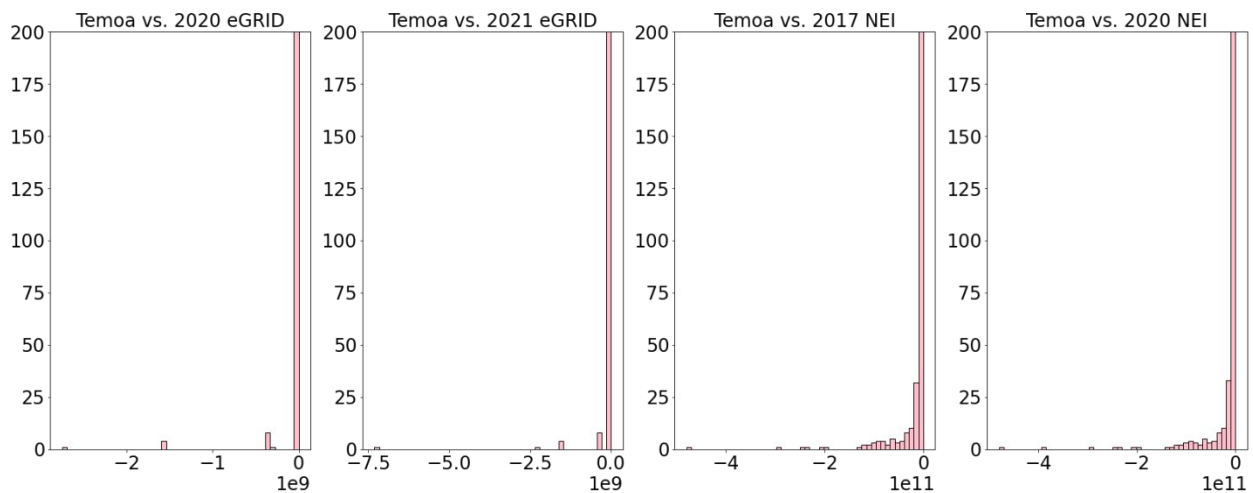


4
5 *Figure S.6: Absolute emissions comparison between eGRID and the National Emissions*
6 *Inventory [kt].*
7

8 When both Temoa and NEI or eGRID report emissions, there is largely agreement, but there are
9 many counties where one source (Temoa, NEI, eGRID) reports emissions and at least one other
10 does not. The downscaled emissions from Temoa align most closely with the NEI, demonstrated
11 in Figure S.6
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Percent Difference Between NO_x Emissions: Temoa vs. eGRID and NEI Datasets



Percent Difference Between NO_x Emissions: Temoa vs. eGRID and NEI Datasets (zoomed in)

Figure S.7: Percent difference between NO_x emissions from power generation simulated by Temoa and reported by existing data source. Columns: (1) Temoa vs. 2020 eGRID (2) Temoa vs. 2021 eGRID (3) Temoa vs. 2017 NEI (4) Temoa vs. 2020 NEI. Rows: (1) Raw data (2) Zoomed in to more clearly display outliers.

IV. Air Quality Modeling

We use select modules of the AP3 integrated assessment model to connect emissions to PM_{2.5} exposure and mortality risk for three criteria air pollutants: primary PM_{2.5}, SO₂, and NO_x. We summarize AP3 herein; however, more details can be found in Dennin & Muller (2024)'s supplementary information⁶ as well as in Clay et al. (2019)⁷ and Tschofen et al. (2019)⁸. AP3⁹ is the third iteration of the Air Pollution Emissions Experiments and Policy analysis (APEEP) model^{10,11}. AP3 uses all emissions of primary PM_{2.5}, SO₂, and NO_x and also NH₃ and VOCs, provided by the EPA's NEI, to estimate baseline concentrations of ambient PM_{2.5} in every county in the contiguous US¹². We use the 2017 NEI to compute a baseline against which we assess the PM_{2.5} concentrations from marginal emissions (i.e., one additional short ton). This baseline accounts for ambient PM_{2.5} levels resulting from nationwide emissions, including directly emitted PM_{2.5}, organic aerosols from VOCs, ammonium sulfate ((NH₄)₂SO₄) from NH₃ and SO₂, sulfate (SO₄²⁻) from SO₂, and ammonium nitrate (NH₄NO₃) from NH₃ and NO_x. The

1 formation of each subspecies of PM_{2.5} is dependent on the unique atmospheric dispersion and
2 chemistry processes associated with the release of its source criteria air pollutant.

3 AP3 models ground-level sources differently than point sources. Moreover, the model treats
4 point sources differently, a function of their effective heights (physical stack height plus the
5 plume rise of released emissions)¹³. Effective heights are calculated following Turner (1994)¹³.
6 Stack and discharge parameters are obtained from the Sparse Matrix Operator Kernel Emissions
7 (SMOKE) flat files, provided by the Environmental Protection Agency (EPA)¹⁴. Weather
8 parameters come from reanalysis data provided by the National Centers for Environmental
9 Prediction (NCEP), with data sourced from the Physical Sciences Laboratory of the National
10 Oceanic and Atmospheric Administration (NOAA)¹⁵. We compute the annual average of
11 surface-level temperatures and horizontal wind speeds using daily average data, spatially
12 resolved in a 2.5-degree latitude by 2.5-degree longitude grid. Each county is assigned the
13 weather data from the grid cell in which it is located. If a county spans multiple grid cells, the
14 data are averaged based on the area of each cell. Our methodology assumes stable conditions, an
15 average lapse rate of -0.0065 K/m, and considers that, for each facility, the dominant rise
16 mechanism is the one producing the greater rise between buoyant and momentum effects.

17 AP3 models three bins for point sources: low, medium, and tall¹¹. For low and medium,
18 emissions are modeled as being released from the population-weighted centroid of the county in
19 which they are released. (Ground-level emissions are also assumed to be released at the counties'
20 population-weighted centroids.):

- 21
- 22 • The low bin contains facilities with effective heights of less than 250 meters.
- 23 • The medium bin is designed for facilities with effective heights greater than 250
- 24 meters and less than 500 meters.
- 25 • When the APEEP) model was first developed¹⁰, facilities with effective heights
- 26 greater than 500 meters were uniquely modeled—making up the “tall stacks bin
- 27 inventory.”
- 28

29 The tall bin’s emissions are modeled from the coordinates of the facility and the effective heights
30 of its stacks. However, any new facility with an effective height greater than 500 meters is not
31 modeled in the tall bin but is instead placed in the medium bin. For this study, all transportation
32 emissions are modeled from the ground-level bin. All EGU emissions are modeled from the
33 medium stacks bin. This methodology for EGU emissions allows us to work at the county level,
34 the spatial resolution of our downscaled simulated emissions, and avoid matching (and
35 potentially mismatching) simulated emissions to specific facilities in the tall bin.

36 It is important to understand the implications of this assumption and its limitations. Hence,
37 we categorize the “existing fleet” of EGUs into bins based on available data. We analyze point
38 source data provided by the NEI for facilities involved in power generation in 2017¹². This
39 dataset is then filtered to include only facilities located in counties modeled by Temoa in 2020.
40 Out of the 1,105 observed EGUs in the resulting dataset, 35% lack the necessary data to compute
41 effective heights. These facilities do not have smokestack parameters reported in EPA’s SMOKE
42 flat files¹⁴, which we can hypothesize corresponds with facilities that do not have tall
43 smokestacks. This gives us justification to assign them to the low stacks bin of AP3. Still, given
44 the uncertainty associated with this assumption, we exclude these facilities from the low stacks
45 bin in Table S.1 (tracking them instead a *NA*), which summarizes the number of facilities by AP3
46 bin and sums total emissions for each.

1 Table S.1 shows that, in 2017, most effective heights among EGUs were below 500 meters
 2 (again, corresponding with AP3's tall bin), with only about 3% exceeding that height. However,
 3 the distribution of emissions tells a different story: no more than 10% of any pollutant was
 4 emitted from facilities with effective heights under 250 meters (corresponding with AP3's low
 5 bin). About one-third of facilities had effective heights between 250 and 500 meters
 6 (corresponding with AP3's medium bin), yet these accounted for roughly two-thirds of total
 7 emissions. Overall, most facilities do not have tall stacks, but most emissions are not from low
 8 stacks.

9
 10
 11 *Table S.1: Electric generating units and NO_x, primary PM_{2.5}, and SO₂ emissions by effective height
 12 and corresponding AP3 bin. Note: facilities and emissions characterize 2017 and are from the
 13 National Emissions Inventory¹². Smokestack parameters are from SMOKE flat files¹⁴.*

| Effective Height | Corresponding AP3 Bin | Electric Generating Units | Emissions | | | Percentage by Bin | | | |
|------------------|-----------------------|---------------------------|-----------------|-------------------|-----------------|-------------------|-------------------|-----------------|------|
| | | | NO _x | PM _{2.5} | SO ₂ | NO _x | PM _{2.5} | SO ₂ | |
| < 250 meters | Low | 327 | 30% | 56.1 | 6.32 | 53.4 | 9.1% | 10% | 6.5% |
| 250-500 meters | Medium | 361 | 33% | 419 | 43.6 | 513 | 68% | 71% | 62% |
| > 500 meters | Tall | 34 | 3.1% | 141 | 11.0 | 258 | 23% | 18% | 31% |
| NA | Unknown | 383 | 35% | 1.96 | 0.650 | 0.154 | 0.3% | 1.1% | 0.0% |

14
 15 Notably, effective heights change over time because plume rise depends on varying
 16 parameters such as exit velocity, gas temperature, and atmospheric conditions¹³. As a result,
 17 some facilities with 2017 effective heights under 500 meters are still categorized in AP3's tall
 18 stacks bin inventory due to the model's original structure^{10,11}. The 52 EGUs that are included in
 19 (1) the 1,105 observed EGUs in Table S.1 and (2) AP3's tall stacks bin inventory are evaluated
 20 in the top panel of Table S.2. These 52 EGUs are included in AP3's tall stacks bin because of
 21 taller effective heights that characterized the plants at previous points in time that may not still be
 22 applicable or were otherwise not applicable in 2017. We summarize these EGUs below:

- 23
- 24 • 42 EGUs, accounting for 72% to 73% of emissions from these 52 EGUs, have 2017
 25 effective heights corresponding with the medium bin (250 to 500 meters)
- 26 • 4 EGUs, accounting for 10% to 12% of emissions from these 52 EGUs, have 2017
 27 effective heights corresponding with the low bin (less than 250 meters)
- 28 • 6 EGUs, accounting for 16% to 19% of emissions from these 52 EGUs, have 2017
 29 effective heights corresponding with the tall bin (more than 500 meters)

30
 31 Conversely, several facilities with 2017 effective heights above 500 meters are not included in
 32 AP3's tall stacks bin inventory. This may be due to fluctuating effective heights over time or
 33 because newer facilities with heights over 500 meters have been defaulted to AP3's medium
 34 stacks bin. Of the 34 EGUs with 2017 effective heights exceeding 500 meters in Table S.1, 28
 35 EGUs (82%) are not in AP3's tall stacks bin inventory and therefore are defaulted to the medium
 36 stacks bin. These EGUs and the others outside of AP3's tall stacks bin inventory are summarized

1 in the bottom panel of Table S.2. AP3’s inflexible structure for tall stack (mostly EGU) facilities
 2 is a limitation of the model, which is currently being addressed in ongoing research developing
 3 its successor, AP4 ¹⁶.

4
 5 *Table S.2: Electric generating units within and outside of AP3’s tall stacks bin inventory. Note:*
 6 *facilities with effective heights > 500 meters were modeled distinctly upon APEEP’s development*
 7 *10,11.*

| Tall Stacks Bin Inventory | Effective Height | Electric | | Emissions | | | Percentage by Bin | | |
|------------------------------|------------------------|------------------|------|-----------------|-------------------|-----------------|-------------------|-------------------|-----------------|
| | | Generating Units | | NO _x | PM _{2.5} | SO ₂ | NO _x | PM _{2.5} | SO ₂ |
| 52 EGUs Within | Low: < 250 meters | 4 | 0.4% | 12.2 | 1.00 | 16.3 | 2.0% | 1.6% | 2.0% |
| | Medium: 250-500 meters | 42 | 3.8% | 110 | 6.95 | 118 | 18% | 11% | 14% |
| | Tall: > 500 meters | 6 | 0.5% | 24.3 | 1.30 | 24.1 | 3.9% | 2.1% | 2.9% |
| 1,053 EGUs Outside | Low: < 250 meters | 323 | 29% | 43.9 | 5.32 | 37.1 | 7.1% | 8.6% | 4.5% |
| | Medium: 250-500 meters | 319 | 29% | 310 | 36.6 | 395 | 50% | 59% | 48% |
| | Tall: > 500 meters | 28 | 2.5% | 116 | 9.71 | 234 | 19% | 16% | 28% |
| | NA | 383 | 35% | 1.96 | 0.650 | 0.154 | 0.3% | 1.1% | 0.0% |

8
 9 The takeaway is that bin assignment uncertainty and limitations exist whether or not we
 10 specifically distribute facilities to different bins by effective heights. Since our Temoa modeling
 11 does not operate at the facility level, assigning all EGU emissions to the medium stacks bin is the
 12 most logical approach. This bin is the best representative for EGUs given the limited facility-
 13 specific information available. Moreover, even if we attempted to allocate emissions from EGUs
 14 with effective heights over 500 meters to AP3’s tall stacks bin, many would still default to the
 15 medium stacks bin (Table S.2’s bottom panel). Additionally, many facilities that could be
 16 assigned to the tall stacks bin are better suited for the medium stacks bin based on 2017 effective
 17 heights (Table S.2’s top panel). The primary potential for missing effective height differentiation
 18 lies with the low stacks bin, but these facilities contribute significantly fewer emissions than
 19 those with effective heights greater than 250 meters, making facility-specific distribution a
 20 persistent challenge.

21 AP3 uses source-receptor (S-R) matrices to model pollution concentrations in every receptor
 22 contiguous US county from all sources of emissions. These matrices are built using Gaussian
 23 plume mathematics, which characterizes three-dimensional atmospheric dispersion from the
 24 point of release ¹⁷⁻¹⁹. AP3 acts as a representation of annually averaged atmospheric conditions;
 25 see Turner (1994) for a further explanation ²⁰.

26 The following equations depict the air quality modeling of AP3. First, as shown in Equation
 27 S.1, emissions (e) from each source (S) are loaded in as vectors (E) by pollutant (p) and bin
 28 height (h). The S-R matrices, shown in Equation S.2, model the transport (t) of a short ton of
 29 pollution from each source to each receptor (R), again by pollutant and bin height. This transport
 30 is specific for each pollutant, accounting for relevant chemistry and deposition processes.
 31 Multiplying the emissions vectors by their associated S-R matrices, shown in Equation S.3,
 32 provides speciated concentrations (C) of pollution, by pollutant and bin height, in each
 33 contiguous US county resulting from all sources’ emissions. The concentrations are then added

1 across the different bin heights for total speciated ambient pollution in every county resulting
 2 from emissions of NH₃, NO_x, primary PM_{2.5}, SO₂, and VOCs.

$$3 \quad E_{p,h} = \begin{bmatrix} e_1 \\ \vdots \\ e_S \end{bmatrix} \quad (\text{Equation S.1})$$

$$4 \quad SR_{p,h} = \begin{bmatrix} t_{1,1} & \cdots & t_{1,R} \\ \vdots & \ddots & \vdots \\ t_{S,1} & \cdots & t_{S,R} \end{bmatrix} \quad (\text{Equation S.2})$$

$$5 \quad C_{p,h} = (E_{p,h})^T \times (SR_{p,h}) \quad (\text{Equation S.3})$$

6 The formation of (NH₄)₂SO₄, SO₄²⁻, and NH₄NO₃ depends on the equilibrium between total
 7 (gaseous plus particulate) ammonia, particulate sulfate, and total nitrate.¹ Specifically, AP3
 8 models the interpollutant chemistry between ambient ammonia (ambient NH₃), sulfuric acid
 9 (H₂SO₄), and nitric acid (HNO₃) as they form particulates²¹⁻²³. AP3 then aggregates all
 10 subspecies of ambient PM_{2.5} to determine total concentrations in each county.

11 Ambient NH₃ reacts preferentially with H₂SO₄ to form (NH₄)₂SO₄. Any remaining, or free,
 12 ambient NH₃ can then react with HNO₃ to form NH₄NO₃.² Two regimes affect this formation:
 13 (1) nitrate-limited, where ambient NH₃ is in surplus, and (2) ammonium-limited, where HNO₃ is
 14 in surplus. The efficiency with which marginal emissions of NH₃ and NO_x form NH₄NO₃
 15 depends on the regime in which a receptor county resides. Unlike emissions of NH₃ and NO_x,
 16 emissions of SO₂ will always contribute to ambient PM_{2.5} formation, regardless of the
 17 availability of ambient NH₃, because SO₄²⁻ is always in the particulate phase.

18 A critical caveat for this study is that we only use marginal PM_{2.5} concentrations considering
 19 a 2017 baseline. In other words, we assess simulated future emissions in their respective future
 20 years, but the marginal PM_{2.5} concentrations per short ton of future emissions are those modeled
 21 in AP3 for 2017. Our use of a constant 2017 pollution baseline is based on data availability. The
 22 NEI is released every three years, which determines the years that can be modeled using the
 23 APEEP model (e.g., AP3 can model 2008, 2011, 2014, and 2017)^{6,8,25}. Although the 2020 NEI
 24 was released last year²⁶, the development of this version of AP3 occurred before that release.
 25 Even if we were to use the 2020 NEI (or the 2023 NEI, expected to be released in 2026),
 26 concerns about changes in atmospheric chemistry profiles through 2050 would remain. The key
 27 issue is the potential for substantial changes in the relative concentrations of one or more
 28 pollutants between 2017 and 2050, which could significantly impact atmospheric chemistry in
 29 the U.S. For the sake of our methods (i.e., a constant 2017 pollution baseline to which marginal
 30 emissions contribute), it is ideal for the relative concentrations of the pollutants from emissions
 31 of SO₂, NO_x, and NH₃ to remain consistent over time. That said, these relative concentrations are
 32 likely to change in the future. For example, the policies evaluated in our study, which focus on
 33 heavy sources of SO₂ and NO_x emissions, would contribute to this change, *ceteris paribus*.

34 Evidence suggests that we should anticipate a future with abundant ambient NH₃ relative to
 35 H₂SO₄ and HNO₃. Since the 2000s, SO₂ and NO_x emissions in the U.S. have declined, while
 36 NH₃ emissions have remained steady²⁷. These trends are mostly expected to persist through

1

² SO₂ and NO_x form H₂SO₄ and HNO₃ when they react with oxygen (O₂) and water (H₂O). For example, 2SO₂ + O₂ + 2H₂O → 2H₂SO₄. For more information on the atmospheric behavior of the family of NO_x compounds, see²⁴.

1 mid-century under the Representative Concentration Pathway (RCP) 4.5 scenario, although NH₃
2 emissions are likely to increase^{28–30}. These contrasting trends are driven by expectations for key
3 sectors. Tschofen et al. (2019) identified that SO₂, NO_x, and NH₃ damages were greatest from
4 the utilities, transportation, and agriculture sectors, respectively⁸. While emissions reductions
5 from the power sector and transportation are projected to continue^{31,32}, research suggests that
6 NH₃ emissions will rise due to higher temperatures from climate change³³ and increased
7 agricultural activity to support a growing population³⁴. However, there are existing methods to
8 reduce NH₃ emissions from agriculture³⁵, and Gu et al. (2021) found that NH₃ abatement is
9 relatively cost-effective compared to NO_x abatement³⁶.

10 These expected changes are significant when considering the marginal concentrations (μ
11 g/m³) we anticipate from SO₂ and NO_x emissions (and NH₃, though it is not the focus of this
12 study). Below is a summary of the key points:

- 14 • In the future, we expect reductions in SO₂ and NO_x emissions and increases in NH₃
15 emissions²⁸. This will alter the relative concentrations influencing the ammonium,
16 sulfate, and nitrate balance.
- 17 • As a result, SO₂ and NO_x emissions are likely to become more damaging on the margin
18 due to the relative surplus of ambient NH₃.
- 19 • Pollution from SO₂ emissions will contribute to ambient PM_{2.5} regardless of the presence
20 of ambient NH₃. Without ambient NH₃, SO₂ will form particulate H₂SO₄ at a minimum
21 ²³. However, with higher NH₃ emissions, the formation of (NH₄)₂SO₄ becomes more
22 likely.³
- 23 • In contrast, NO_x emissions will not contribute to ambient PM_{2.5} without free ambient
24 NH₃.⁴ As NH₃ emissions increase, HNO₃ is more likely to form NH₄NO₃, which
25 contributes to ambient PM_{2.5}.

26
27 In conclusion, SO₂ and NO_x emissions are more damaging per ton on the margin in an NH₃-
28 saturated environment compared to an NH₃-limited environment.

29
30 Hernandez (2023), which examined the sensitivity of health damages to changes in
31 atmospheric chemistry, provides relevant insights²⁸. Using a chemical transport model, the study
32 projected that marginal annual damages from ambient PM_{2.5} associated with SO₂ and NO_x
33 emissions are expected to increase by 16% and 17%, respectively, from 2005 to 2055 when
34 accounting only for interactions between sulfate, nitrate, and ammonium PM_{2.5} components.
35 These are relatively modest changes in marginal damages, supporting the use of RCMs even for
36 analyses decades in the future with different emissions baselines. Additionally, since our focus is
37 on changes from 2017 to 2055, we need to account for the fact that over a decade of emissions
38 reductions from SO₂ and NO_x already influences AP3's baseline. This period includes the most

³ (NH₄)₂SO₄ is more damaging than H₂SO₄ when derived from the same quantity of SO₂ emissions. This is best illustrated by comparing their molecular weights: 132 g/mol for (NH₄)₂SO₄ and 98 g/mol for H₂SO₄.

⁴ AP3 assumes that all NO_x emissions contribute to ambient PM_{2.5}, even in the absence of free ambient NH₃ (based on the modeled reaction between H₂SO₄ and NH₃). Since AP3 models annual average concentrations, it would be inaccurate to assume that no ambient PM_{2.5} from NO_x would occur without modeled free NH₃. For instance, there may be periods during the year with high levels of ambient NH₃ and low levels of H₂SO₄, contrary to more typical conditions. On such days, HNO₃ could react with the available NH₃ to form NH₄NO₃. The statistics used in AP3 for this calculation are derived from calibration efforts involving the Comprehensive Air Quality Model with extensions (CAMx) model^{37,38}.

1 significant decrease in SO₂ and NO_x emissions relative to future years²⁸. By 2017, AP3’s
 2 baseline indicated that most counties had some level of free ambient NH₃, based on annual
 3 average concentrations. Therefore, by 2017, SO₂ was likely already forming more damaging
 4 (NH₄)₂SO₄. The formation of NH₄NO₃ from NO_x would vary by county depending on the extent
 5 of the availability of free NH₃. As a result, the expected increases in damages from SO₂ and NO_x
 6 emissions from 2017 to 2055 (rather than from 2005 to 2055) are likely to be less than the
 7 projected 16% and 17% increases.

8 Importantly, Hernandez (2023) also examined the extent to which NO_x contributes to
 9 tropospheric ozone in 2005 versus 2055²⁸. Ozone is a significant oxidant for VOCs, which form
 10 ambient PM_{2.5} as secondary organic aerosols (SOAs). The study found that the marginal
 11 damages from NO_x emissions related to ozone formation are expected to increase by more than
 12 500% from 2005 to 2055. This represents a limitation of the AP3 model and our study, as they
 13 do not account for the ambient PM_{2.5} impacts of ozone on SOA formation or the health impacts
 14 of tropospheric ozone itself^{39,40}. On the whole, Hernandez found that NO_x damages (including
 15 both organic and inorganic sources) would approximately double from 2005 to 2055.

16 Conversely, our analysis does not factor in the benefits associated with reduced ambient
 17 PM_{2.5} from marginal NH₃ emissions due to fewer SO₂ and NO_x emissions. These co-benefits will
 18 accrue because ambient NH₃ will not contribute to PM_{2.5} formation without H₂SO₄ or HNO₃ to
 19 react with. In fact, marginal damages from NH₃ emissions are projected to decline by 67% from
 20 2005 to 2055²⁸.

21 In summary, assuming that ambient NH₃ remains as relatively abundant as it was in 2017 is a
 22 straightforward and reasonable approach given the discussion above. The marginal ambient
 23 PM_{2.5} concentrations from SO₂ emissions are likely to be associated with (NH₄)₂SO₄, both in
 24 2017 and in the future. However, we can assert with confidence that these will not increase by
 25 more than 16% by mid-century. For NO_x emissions, the impacts vary by receptor location
 26 depending on the availability of free ambient NH₃, but we can reasonably assume that the net
 27 damages may double by mid-century. While adjusting our baseline for future assessments could
 28 provide more precise estimates, it would introduce significant complexities and potential
 29 distortions in our results.

30 We again note that our work is comparative in nature. As with our 2017 concentrations, we
 31 can assume that any errors in our future projections will be uniformly distributed (e.g., if NO_x
 32 becomes more damaging, it will be more damaging “everywhere”). The primary concern is
 33 whether there is a systematic link between agricultural activity (and NH₃ emissions) and (1)
 34 changes in emissions from electric generating units and transportation or (2) the locations of the
 35 subpopulations assessed in our study. We leave such investigations and further efforts to project
 36 atmospheric chemistry conditions to future research.

37 AP3 is calibrated using EPA Air Quality System (AQS) monitoring data⁴¹. Key statistics are
 38 the mean fractional error (MFE) and mean fractional bias (MFB), defined below—Equations S.4
 39 and S.5, respectively. Model predictions of ambient concentrations ($C_{m,i}$) are compared to
 40 observed levels of ambient concentrations ($C_{o,i}$) for receptor county locations with AQS
 41 monitoring data (i):

$$42 \quad MFE = \frac{1}{n} \sum_{i=1}^n \frac{|c_{m,i} - c_{o,i}|}{\left(\frac{c_{m,i} + c_{o,i}}{2}\right)} \quad (\text{Equation S.4})$$

$$43 \quad MFB = \frac{1}{n} \sum_{i=1}^n \frac{c_{m,i} - c_{o,i}}{\left(\frac{c_{m,i} + c_{o,i}}{2}\right)} \quad (\text{Equation S.5})$$

1
2 AP3 is calibrated using the observed data. The procedure compares AP3-modeled ambient
3 PM_{2.5} concentrations to those measured at monitors and conducts several calibration steps to
4 improve the prediction-observation fit. The primary calibration step is an iterative approach that
5 reduces the MFE and the MFB by adjusting calibration coefficients applied alongside the source-
6 receptor matrices. A secondary calibration step is also taken to adjust the share of ambient PM_{2.5}
7 from primary PM_{2.5} emissions for the 2.5th percentile of counties with the greatest absolute
8 difference between modeled and monitored pollution. Subsequently, in a tertiary calibration step,
9 neighboring counties surrounding the secondary calibration-adjusted counties are also considered
10 for adjustment, where monitoring data and modeling estimates support such decisions.

11
12
13 *Table S.3: Performance metrics for AP3 following calibration. Note: monitored data are*
14 *from the Environmental Protection Agency’s Air Quality System*⁴¹. *r = Pearson’s correlation*
15 *coefficient. n = number of AQS-monitored counties for each pollutant. Calibration efforts are*
16 *from*^{42,43}.

| Year | Ambient Pollutant | Performance Metrics | | | |
|------|-------------------------------|---------------------|--------------|--------------|------------|
| | | MFE | MFB | r | n |
| | Total PM_{2.5} | 0.292 | 0.012 | 0.523 | 603 |
| 2017 | Sulfate | 0.329 | -0.105 | 0.699 | 255 |
| | Nitrate | 0.492 | 0.070 | 0.624 | 251 |
| | Organic Aerosols | 0.398 | -0.043 | 0.450 | 247 |
| | Ammonium | 0.996 | 0.995 | 0.546 | 132 |

17
18 These calibration efforts were conducted as part of the 2017 NEI update to AP3. We attribute
19 the calibration work to Tschofen et al. (2023)⁴² and Tschofen (2023)⁴³. Furthermore, the
20 calibration procedure built upon previous work^{25,37,44}. Table S.3 summarizes the performance
21 metrics for AP3 following calibration. AP3 performs within the performance standards set by the
22 literature and summarized below^{45,46}:

23 Boylan & Russell (2006): According to⁴⁵, a MFE ≤ +50% and a MFB ≤ ±30% suggests that
24 a model has met its performance goal.⁴⁵ also notes that an MFE ≤ +75% and an MFB ≤ ±60%
25 are acceptable for modeling and that minor species should have less stringent requirements. The
26 Intervention Model for Air Pollution (InMAP) model⁴⁷ also considers this performance
27 standard.

- 28 • Morris et al. (2005): According to⁴⁶, an MFE ≤ +35% and an MFB ≤ ±15% suggests that
29 a model achieves “excellent” performance.⁴⁶ also classified an MFE ≤ +50% and an
30 MFB ≤ ±30% (i.e., the main standard from⁴⁵) as “good” performance. The Estimating
31 Air pollution Social Impact Using Regression (EASIUR) model⁴⁸ also considers this
32 performance standard.

33
34 For total PM_{2.5} and sulfate, AP3 meets the “excellent” performance standard from Morris et
35 al. (2005)⁴⁶. Nitrate and organic aerosols meet the standard from Boylan & Russell (2006)⁴⁵.
36 Ammonium is the one subspecies that has a lower performance. We again emphasize that⁴⁵

1 noted that minor species should have less stringent requirements and that ammonia is not a focus
2 of this study.

3 AP3 builds out a pollution baseline, but its outputs are the marginal impacts of emissions—
4 e.g., additional PM_{2.5} concentrations in downwind locations from a small increase in emissions
5 from a particular source. In other words, once the baseline concentrations are determined by
6 modeling all emissions¹², policy analyses are conducted by running emissions experiments as
7 outlined in the following steps:

- 8
- 9 1. Set the model to its baseline (i.e., PM_{2.5} in every county from all emissions).
- 10 2. Add one short ton of emissions for one pollutant from an individual source.
- 11 3. Compute the marginal concentrations in every receptor county by subtracting baseline
12 concentrations from the new concentrations with the marginal short ton added.
- 13 4. Reset the model to its baseline.
- 14 5. Repeat 2-4 for each source and pollutant combination.

15

16 Marginal concentrations of PM_{2.5} are the output of AP3's air quality modeling for this study.
17 Then, we multiply total (avoided) emissions by their associated marginal concentrations for total
18 (avoided) PM_{2.5} concentrations in every receptor county. This is an approach based on that
19 conducted in previous work—e.g.,^{6,8,25,49}.

20

21 V. Mortality Risk and Scenarios

22 We use a dose-response function from the epidemiological literature, shown in Equation S.6,
23 to associate exposure to ambient PM_{2.5} with premature mortality risk. The dose-response
24 function models the expected change in mortality rates across populations from a change in
25 PM_{2.5}. The inputs to the function are a β coefficient, the baseline mortality rate of the exposed
26 population (y_0), and the change in ambient PM_{2.5} pollution (ΔPM). β is further defined in
27 Equation S.7. β is the natural log of the relative risk (RR) with a change in PM_{2.5}. Multiplying the
28 expected change in mortality rate (Δy) by the corresponding population, depicted in Equation
29 S.8, yields the premature mortality associated with the change in PM_{2.5}.

$$30 \quad \Delta y = y_0 \left(1 - \frac{1}{\exp(\beta \times \Delta PM)} \right) \quad (S.6)$$

$$31 \quad \beta = \frac{\ln(RR)}{\Delta PM} \quad (S.7)$$

$$32 \quad \Delta Mortality = \Delta y \times Population \quad (S.8)$$

33 Table S.4 shows the mortality scenarios used in this study. Krewski et al. (2009) reported
34 information for populations of 30 or older⁵⁰. The study reported relative risk (i.e., the chances of
35 an event occurring in an exposed group vs. the chances of it happening in a control group) of all-
36 cause mortality associated with a 10 $\mu\text{g}/\text{m}^3$ increase in ambient PM_{2.5} exposure. This relative risk
37 is used in Scenario 1 of Table S.4.

1 *Table S.4: Input parameters for concentration-response function. Note: relative risk and*
 2 *baseline mortality are held constant across model time periods due to data availability.*

| | Relative risk [source] | Baseline mortality |
|------------|-----------------------------------|-------------------------------------|
| Scenario 1 | 1.06 [ACS: Krewski et al. (2009)] | Changes with race-ethnicity and age |
| | Black non-Hispanic: 1.208 | |
| | White non-Hispanic: 1.063 | |
| Scenario 2 | Hispanic: 1.116 | |
| | Other: 1.096 | Changes with race-ethnicity and age |
| | [Di et al. (2017)] | |
| Scenario 3 | 1.06 [ACS: Krewski et al. (2009)] | Changes with age |

3
 4 Di et al. (2017) reported information for populations of 65 or older ⁵¹. The study also
 5 reported relative risk of all-cause mortality associated with a 10 µg/m³ increase in ambient PM_{2.5}
 6 exposure. However, Di et al. (2017) also reported relative risk differentiated by race/ethnicity
 7 subpopulation. As discussed in the manuscript, we assume these differentiated relative risks to
 8 apply not only to the studied population (i.e., 65 or older) but also to other adults found to
 9 experience damage by Krewski et al. (2009) (i.e., 30 or older). We assert that this methodology
 10 is not informed by the epidemiological literature but rather by the reasonable assumption that
 11 disparities existing for older age intervals may also exist for younger age intervals. These relative
 12 risks are used in Scenario 2 of Table S.4.

13 County-level mortality rate data are derived using population and mortality data from the
 14 CDC’s WONDER ^{52,53}. Data are reported by county, age group, and, optionally, race/ethnicity.
 15 Where data are not available to compute mortality rates, first the state average, then the US
 16 Health and Human Services region average, and then the national average mortality rates are
 17 substituted in, as necessary. Table S.4’s Scenario 1 and Scenario 2 consider mortality rates by
 18 county, age group, and race/ethnicity. Table S.4’s Scenario 3 considers mortality rates by only
 19 county and age group.

20 A critical caveat for this study is that we only use mortality rates in 2017. Since our analysis
 21 extends far into the future, we miss potentially notable changes in baseline mortality rates. These
 22 could be related to various trends (e.g., changes in the health care system). Future work could
 23 further incorporate expected future mortality rates into prospective analyses such as that
 24 conducted herein.
 25

26 **VI. Marginal Damages by Effective Height**

27 Because we model all EGUs from the medium stacks bin of AP3 (250 meters < effective
 28 height < 500 meters), it is important to explore the differences in impacts from various bin
 29 heights and consider how our results might change when using the low stacks or tall stacks bins
 30 instead of our default medium stacks procedure. Table S. presents emissions-weighted marginal
 31 damages (in deaths per short ton) for NO_x, primary PM_{2.5}, and SO₂ from all sources of pollution
 32 across the contiguous U.S. in 2017, as reported by the NEI ¹². The concentration-response

1 function uses relative risk from Krewski et al. (2009)⁵⁰ and all-person population counts and
 2 baseline mortality rates, both differentiated by age, provided by the CDC^{52,53}.

3
 4 *Table S.5: Marginal damages (in deaths per short ton) by AP3 bin. Note: marginal damages are*
 5 *emissions-weighted from all sources of pollution across the contiguous U.S. in 2017 as reported*
 6 *by the National Emissions Inventory*¹².

| Variable | AP3 Bin | Pollutant | | |
|--|---------|-----------------|-------------------|-----------------|
| | | NO _x | PM _{2.5} | SO ₂ |
| Marginal Damages (Deaths/Short Ton) | Low | 1.89E-03 | 1.54E-02 | 7.44E-03 |
| | Medium | 1.05E-03 | 8.77E-03 | 4.29E-03 |
| | Tall | 9.55E-04 | 5.00E-03 | 4.11E-03 |
| Versus Medium | Low | +80% | +76% | +73% |
| | Tall | -9.0% | -43% | -4.2% |

7
 8 Facilities in AP3’s low bin have significantly higher marginal damages on average
 9 compared to the medium bin. Specifically, deaths per ton of NO_x, primary PM_{2.5}, and SO₂ are
 10 81%, 76%, and 73% greater, respectively. Conversely, facilities in the tall bin have lower
 11 marginal damages on average than those in the medium stacks bin, with deaths per ton of NO_x,
 12 primary PM_{2.5}, and SO₂ being 9%, 43%, and 4% lower, respectively. Marginal damages from
 13 taller facilities are typically lower because their smokestacks are designed to disperse
 14 concentrated pollution away from ground-level populations, whereas lower facilities tend to have
 15 the opposite effect.

16 While Table S.5 demonstrates that low or tall facilities/emissions attributed to the
 17 medium bin could be notably mischaracterized, we again highlight that the goal of our paper is
 18 comparative in nature. Our focus is on how air quality changes for different populations under
 19 different pathways. In short, where we error, we error the same for all pathways. While the
 20 marginal concentrations and marginal damages from EGUs with lower effective heights may be
 21 higher and from EGUs with higher effective heights may be lower, we can assume that they will
 22 do so uniformly or randomly. We note that this is not a strictly valid assumption if there is a
 23 correlation between low or tall facilities/emissions and (1) where EGU emissions change
 24 (relative to other EGU emissions) or (2) where the subpopulations assessed herein live.
 25 However, we leave that investigation as well as any further efforts to evaluate our atmospheric
 26 transport assumptions to future work.

27
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