



June 22, 2021

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

Dear Administrator Regan:

As national health, medical and nursing organizations, we are writing to urge you to move swiftly to set stronger National Ambient Air Quality Standards for particulate matter and ozone pollution. The latest science and medical data demonstrate the urgent need for tighter limits on these harmful and pervasive pollutants, particularly to protect vulnerable populations including children, older Americans, people living with asthma and other chronic health conditions, pregnant people and communities of color. Our organizations are deeply concerned by the health threats from breathing ozone and particle pollution and have a strong interest in standards that adequately protect health.

Too many Americans suffer health harms and premature death because the air where they live is unsafe to breathe. The American Lung Association's "State of the Air" 2021 report finds that despite some nationwide progress on cleaning up air pollution, more than 40% of Americans—over 135 million people—are living in places with unhealthy levels of ozone or particle pollution.<sup>1</sup> The burden of living with unhealthy air is not shared equally. People of color are over three times more likely to be breathing the most polluted air than white people.

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<sup>1</sup> American Lung Association. State of the Air. Apr 2021. [www.lung.org/sota](http://www.lung.org/sota)

Fine particulate matter, or soot, is an extremely dangerous pollutant, a deadly mix of metals, organic chemicals, and acidic substances that are so small they can be inhaled deeply into the lungs and enter the bloodstream. Soot comes from many sources, including fuel combustion and industrial processes that result in greater exposure for communities of color. In addition to increases in overall mortality rates, hospitalization rates, and emergency room visits, fine particle pollution is linked to many serious health harms, including asthma, heart attacks, stroke, heart disease, COPD, Parkinson's disease, dementia, low birth weight, preterm birth, and infant mortality. The latest science shows that stronger annual and daily standards would save many lives. By EPA's own estimates, even if the air quality around the country met the existing standards, 50,000 lives would still be prematurely lost, and a recent study estimated that fine particulate matter is responsible for between 85,000-200,000 excess deaths annually.<sup>2</sup>

Ground-level ozone, or smog, is a result of industrial emissions from power plants, refineries, factories, and vehicle emissions combining with sunlight in the atmosphere. Ozone pollution can trigger asthma attacks and increase the risk of heart and lung diseases, particularly in children, older adults, and people who are active outside, like outdoor workers. It also contributes to the acceleration of climate change which brings its own physical and mental health impacts. When the national standard for smog was updated in 2015, EPA's independent science advisors warned that it might not be adequately protective, and after six more years of research, there is increasing evidence that a more protective, science-based standard is necessary to adequately protect the health of our communities.

In establishing National Ambient Air Quality Standards, the Clean Air Act requires that EPA sets standards that protect public health with an adequate margin of safety. In other words, health-based air quality standards must be set at levels that protect all people, especially sensitive groups. Ozone and particulate matter air pollution tend to affect vulnerable individuals more, which is why it is particularly important to build a margin of safety into air quality standards so that at-risk groups such as the elderly, children, and people with lung, heart and other chronic diseases are adequately protected.

The previous administration finalized its review of the national standards for both ozone and particulate matter during its final months. In both cases, the review process was seriously undermined by limiting the review of evidence, minimizing scientific input, rushing the timeline and curtailing public participation. Despite robust scientific evidence indicating that current standards are too weak to adequately protect Americans from the health harms of pollution, as well as strong public opposition to the anti-science proposals, the previous administration declined to strengthen these pollution protections and finalized do-nothing standards that fail to protect public health.

EPA's mission is to protect public health and the environment, and strengthening these standards based on sound scientific and medical evidence will do just that by saving lives and cleaning up dirty air for all Americans. Reductions in these pollutants will also likely have important carbon reduction co-benefits that are desperately needed if the nation is to achieve its climate objectives.

We thank you for recently announcing the reconsideration of the 2020 NAAQS for particulate matter. We urge you to reconsider the 2020 NAAQS for ozone. We appreciate the stated intentions of the Biden

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<sup>2</sup> Christopher W. Tessum, David A. Paoletta, Sarah E. Chambliss, Joshua S. Apte, Jason D. Hill, Julian D. Marshall. PM2.5 pollutants disproportionately and systemically affect people of color in the United States. *Science Advances* (Apr 28 2021); EABF4491 <https://advances.sciencemag.org/content/7/18/eabf4491>

Administration and EPA to restore the role of sound science, transparency and community engagement in government, as well as its actions to prioritize health and environmental justice in its actions. Together we call on you to act on those stated priorities by making updates to the ozone and particulate matter standards a central part of EPA's plan to build back better by moving expeditiously to finalize the reconsideration of the particulate matter standards, and to promptly announce the reconsideration of the ozone NAAQS and to finalize those standards by Winter 2022/Spring 2023.

Sincerely,

Allergy & Asthma Network

Alliance of Nurses for Healthy Environments

American Academy of Pediatrics

American Heart Association

American Lung Association

American Public Health Association

American Psychological Association

American Thoracic Society

Association of Schools and Programs of Public Health

Asthma and Allergy Foundation of America

Children's Environmental Health Network

Climate for Health

Health Care Without Harm

Medical Society Consortium on Climate and Health

Medical Students for a Sustainable Future

National Association of Pediatric Nurse Practitioners

National Hispanic Medical Association

National League for Nursing

Physicians for Social Responsibility

Public Health Institute