



August 26, 2020

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

Re: Comment Period Extension for proposed rulemaking – Docket No. EPA-HQ-OAR-2018-0279

Dear Administrator Wheeler:

On March 13, 2020, the President declared a national emergency in response to the COVID-19 pandemic. Many health professionals including nurses, physicians, researchers, and other public health professionals continue to be focused on response to the pandemic, as cases continue to rise nationally. The undersigned health and medical organizations respectfully request that the U.S. Environmental Protection Agency (EPA) extend the comment deadline on the proposal to “Retain the Ozone National Ambient Air Quality Standards” to at least 60 additional days after the end of the national emergency, or 60 additional days after the close of the currently scheduled comment period, whichever is later. We thank EPA for scheduling public hearings on August 31 and September 1, but we are troubled that the public was given less than two weeks to register for the hearings. We respectfully request that that an additional round of at least 2 hearing days for public testimony are provided later in September with additional notice to permit the public to participate in the hearings.

The National Ambient Air Quality Standards (NAAQS) for ozone is vital for public health. The proposed comment period of only 45 days is far too limited. Past EPA reviews of NAAQS have had 60 day or longer comment periods. The 2015 ozone NAAQS review included a 90-day public comment period.

In addition, a comment period for a rule such as this merits full public participation, especially from health and medical professionals who treat patients suffering from health issues related to air pollution and/or perform research on air pollution impacts. Since many health professionals are focused on the COVID-19 pandemic, more time is required to ensure they can engage.

We also request that EPA provide additional opportunities for public input. EPA's recent public hearings on its proposal to maintain the existing National Ambient Air Quality Standards for Particulate Matter garnered strong public interest, requiring EPA to add two additional hearing days to the schedule, even amid the pandemic. It is critical that members of the public from across the country have the opportunity to provide oral comments on this proposal.

An extension of this comment period of at least 60 additional days after the end of the national emergency, or 60 additional days after the close of the currently scheduled comment period (whichever is later), and additional public hearings will provide us and other stakeholders, particularly those in the health and medical community, greater opportunity for full and meaningful public participation. Thank you for your consideration of this request.

Sincerely,

Allergy & Asthma Network  
Alliance of Nurses for Healthy Environments  
American Academy of Pediatrics  
American Lung Association  
American Thoracic Society  
American Public Health Association  
Association of Schools and Programs of Public Health  
Asthma and Allergy Foundation of America  
Children's Environmental Health Network  
Health Care Without Harm  
International Society for Environmental Epidemiology -- North American Chapter  
Medical Society Consortium on Climate and Health  
National Association of County and City Health Officials  
National Association of Pediatric Nurse Practitioners  
Physicians for Social Responsibility