

Comments of Katherine Pruitt – As Prepared for Delivery
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On The U.S. Environmental Protection Agency's Reconsideration of the National Ambient Air Quality Standards for Particulate Matter Docket ID No. EPA-HQ-OAR-2015-0072

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Good morning. My name is Katherine Pruitt – **KATHERINE PRUITT**. I am National Senior Director for Policy with the American Lung Association. I appreciate the opportunity to offer comments on EPA's proposed rule for the Reconsideration of the National Ambient Air Quality Standards for Fine Particulate Matter.

This proposal must be strengthened in a number of ways to protect Americans' health. The Lung Association continues to urge EPA to follow the science and finalize the annual standard at no higher than 8 micrograms per cubic meter and the 24-hour standard at no higher than 25 micrograms per cubic meter.

You have heard from some of my colleagues about other aspects of this rule. My comments today will focus on the impact that failing to adopt standards that are adequately protective of public health will have on the value of the Air Quality Index.

The Air Quality Index, or AQI, is recognized internationally as a well-designed, easy-to-understand resource to communicate air quality information to the public. Since its inception in 1999, the AQI has become embedded in weather and air quality forecasting, including on our smartphones, and is literally at-hand to help people plan their outdoor activities, and make decisions about when they need to take measures to protect themselves from exposure to levels of air pollution that could put their health at risk.

Although the AQI is not part of the NAAQS, it is, in a way, the public face of air quality standards, and is how most Americans interact with information about the healthfulness of the air they're breathing. I would suggest it is also where most people learn about the health effects of air pollution, and who is considered to be most at risk.

The breakpoints for the AQI categories for Moderate (code yellow), Unhealthy for Sensitive Groups (code orange) and Unhealthy (code red) are tied to the 24-hour standard. This only works as the public health tool it is intended to be if the standard is strengthened to reflect what we have learned about the health impact of PM across populations at these lower concentrations.

The AQI suggests that only exposures of more than 35 micrograms per cubic meter are unhealthy for sensitive groups and designated code orange. Days with levels from 12 to as high as 35 micrograms per cubic meter are considered “moderate” or code yellow days. This provides an inaccurate picture of the health risks of daily exposure to particle pollution.

EPA’s official caution for a code yellow moderate day for PM2.5 includes:

- “Who Needs to be Concerned? Some people who may be unusually sensitive to particle pollution.”
- What Should I Do? **Unusually sensitive people:** *Consider reducing* prolonged or heavy exertion. **Everyone else:** It’s a good day to be active outside.”

Millions of people all over the country, including children, the elderly, pregnant people those living with chronic disease and people of color are at risk of a range of health harms, including death, from particle pollution at levels that the AQI considers “moderate”. Setting a more protective standard will not only drive pollution cleanup, but also provide more accurate information so families, teachers, coaches and others can make decisions to reduce or prevent exposures to PM2.5 at levels that we know do indeed threaten health.

If this administration does not take this opportunity to strengthen the 24-hour standard to protect the public from this deadly pollutant, how much longer will we have to wait?

Thank you.