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U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

June 21, 2022

**Re: EPA's Good Neighbor Plan regarding the Federal Implementation Plan Addressing Regional Ozone Transport for the 2015 Primary Ozone National Ambient Air Quality Standard**

Dear Administrator Regan,

As epidemiologists, we know that human health is negatively affected by air pollution exposures, including ozone. Ozone is a highly irritating gas that is formed in the atmosphere in the presence of sunlight from other "precursor" air pollutants, including NO<sub>x</sub> and hydrocarbons that are emitted by industrial and combustion sources, such as fossil fuel burning power plants. The adverse health consequences of breathing ozone are serious and well documented. This documentation includes impacts demonstrated in controlled chamber exposures of humans and animals, and observational epidemiology showing consistent associations between ozone and adverse impacts across a wide range of human health outcomes, as documented in the attached comments made by our North American Chapter members to the Office of Management and Budget in December, 2020.

Since air pollution crosses state lines, the scope of the ozone problem requires coordinated multi-state action, as EPA now proposes. Thus, given the known harmful effects of ozone air pollution, we are in full support of the EPA's proposed Good Neighbor Plan to address inter-state transport of ozone pollution and its precursors.

Sincerely,

George D. Thurston, NYU School of Medicine, New York, NY  
Abiodun Oluyomi, Baylor College of Medicine, Houston, TX  
On behalf of the North American Chapter of the International Society for Environmental Epidemiology (ISEE)