



Asthma and Allergy  
Foundation of America



The Medical Society Consortium on  
**CLIMATE & HEALTH**



December 1, 2025

Lee Zeldin, Administrator  
U.S. Environmental Protection Agency  
William J. Clinton Building  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Cc: Ms. Paige Wantlin  
Air Quality, Policy Division  
Office of Air Quality Planning and Standards  
Environmental Protection Agency,  
109 TW Alexander Drive,  
Research Triangle Park, NC 27711

**Re: Comments on EPA's Advance Notice of Proposed Rulemaking on "Visibility Protection: Regional Haze State Plan Requirements Rule Revision" (Docket #: EPA-HQ-OAR-2025-1477)<sup>1</sup>**

Dear Administrator Zeldin:

The undersigned health and medical organizations offer the following comments on the Environmental Protection Agency's (EPA's) Advance Notice of Proposed Rulemaking (ANPRM) on potential restructuring of the Regional Haze Rule.

Our organizations serve patients and populations who are at disproportionate risk of harm from outdoor air pollution, including the pollutants controlled under the Regional Haze Program. Everyone deserves to breathe clean, healthy air in national parks and wilderness areas. We are concerned that this ANPRM could lead to changes that put visitors' health at further risk from poor air quality.

Section 169A of the Clean Air Act (CAA) requires states to develop plans to reduce air pollution that impairs visibility in federal Class I areas such as national parks and wilderness areas. Pursuant to this statutory mandate, the Regional Haze Rule (RHR) was

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<sup>1</sup> [Federal Register :: Visibility Protection: Regional Haze State Plan Requirements Rule Revision](#)

first promulgated in 1999 with the goal of achieving natural visibility conditions in the 156 Class I areas across the country. To meet this long-term goal, the RHR requires all states to make "reasonable progress" in reducing haze that impacts Class I areas. To demonstrate their progress, states are required to prepare a State Implementation Plan (SIP) every 10 years that identifies and implements emission reduction measures based on four statutory factors: cost of compliance, time necessary, energy and non-air environmental impacts, and remaining useful life of sources.

### **Undermining Clean Air Act requirements to reduce haze**

While visibility has significantly improved in some Class I areas over the past two decades, none of those areas has yet achieved the statutory goal of natural visibility conditions. Since its enactment, EPA has periodically revised the Haze Rule and the agency guidance on plan development. But this ANPRM represents an unprecedented dismantling of a core clean air program and an alarming shift away from the Clean Air Act mandate to restore natural visibility in federal Class I areas by holding polluting sources accountable.

EPA's proposed "alternative approaches" outlined in the ANPRM could fundamentally weaken the Regional Haze Rule by reinterpreting its requirements and dismantle decades of progress towards natural conditions. In the alternative approaches, EPA suggests that states might not need to consider the four statutory factors or submit SIPs at all. These "approaches" would allow states to avoid pollution reduction obligations entirely which is a stark departure from EPA's prior interpretations of RHR. These "alternative approaches" could directly undermine the statutory requirement under 40 CFR §51.308 for states to demonstrate reasonable progress toward natural visibility conditions.<sup>2</sup>

The ANPRM is unclear on the "development of criteria used to determine when a SIP revision is necessary" and in "determining SIP content requirements". By not specifying the criteria the agency is proposing on when SIP revisions would be triggered (such as by major visibility degradation, or by measurable lack of progress) and not explaining which elements in SIP content (such as number of source analyses, enforceable emission limits, or public engagement opportunities) would be reduced or removed, EPA's approaches could reduce transparency, accountability and the rigor of pollution control planning.<sup>3</sup>

In short, the "alternative approaches" in the ANPRM could effectively nullify the requirement of the states to develop regional haze SIPs, to assess reasonable progress, and to implement enforceable controls. They could render the haze provisions meaningless, violating both the letter and spirit of Section 169A of the Clean Air Act, which a bipartisan Congress enacted to remedy existing and prevent future visibility impairment from manmade pollution.<sup>4</sup>

### **Health benefits of reducing haze**

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<sup>2</sup> [eCFR :: 40 CFR 51.308 -- Regional haze program requirements.](#)

<sup>3</sup> [Federal Register: Visibility Protection: Regional Haze State Plan Requirements Rule Revision](#)

<sup>4</sup> [Regional Haze Rule – Environmental and Energy Law Program](#)

There is more to the RHR than improving visibility and preserving scenic views in iconic national parks and wilderness areas. The public health imperative in reducing haze,<sup>5</sup> coupled with the direct health benefits offered by these Class I areas, must not be overlooked.

These unique areas are increasingly threatened by haze pollution, which not only obscures scenic vistas and degrades visitor experience, but also poses serious health risks. Haze-causing air pollutants such as fine particulate matter, sulfur dioxide, nitrogen oxides and ozone cause or are linked to various health harms, including respiratory illnesses such as decreased lung function, asthma, and chronic obstructive pulmonary disease, cardiovascular complications, and even premature death.<sup>6</sup> Nearly all national parks are affected by haze caused by these pollutants, which are transported hundreds of miles downwind from their emission sources.<sup>7</sup> Haze-related air pollution disproportionately impacts communities near these protected public lands who are generally low-income and historically marginalized populations, just as those living near pollutant emission sources.<sup>8</sup>

The federally protected Class I areas offer unmatched, affordable and accessible recreational opportunities including hiking, biking, camping and enjoying solitude to people irrespective of their socioeconomic status.<sup>9</sup> Such outdoor activities enable a deeper connection to nature, which has been proven to reduce stress, improve physical health, and support mental resilience, underscoring the growing recognition of nature's role in public health.<sup>10</sup> These areas are important to the physical and mental wellbeing of millions of Americans.

Protecting the ecosystems in federal Class I areas from haze-related pollution is not only a legal obligation under the Clean Air Act, but a moral imperative to ensure access to clean air and health-restorative natural areas.

**Conclusion:** EPA must abandon the “alternative approaches” in the ANPRM, which could weaken the RHR and run counter to the Clean Air Act mandate. Instead, we ask that the agency reaffirm its commitment to the Act's visibility protection goals by strengthening the RHR and enforcing its implementation through SIPs that prioritize robust pollution reduction strategies and address both ecological and human health impacts. Visibility protection is public health protection. Ensuring continued progress toward restoring clean air and clear skies over the unique landscapes of federal Class I areas to natural conditions is required under the Clean Air Act. This progress safeguards not only ecosystems, but the health and well-being of the people who visit them and the communities that live near them.

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<sup>5</sup> Chen, Y. (2025). [The Impact of Atmospheric Haze on Human Health](#). *Geoscience and Remote Sensing*, 8(1).

<sup>6</sup> Manisalidis, I. *et al.* (2020). [Environmental and Health Impacts of Air Pollution: A Review](#). *Frontiers in Public Health*, 8:14.

<sup>7</sup> [Air & Climate Report - National Parks Conservation Association](#)

<sup>8</sup> Nelson, P. (2019). [Demographic Dynamics in Public Lands Counties, 1990-2016](#). *Headwaters Economics; Study Finds Exposure to Air Pollution Higher for People of Color Regardless of Region or Income | US EPA*

<sup>9</sup> Foderaro, L. W. & Klein, W. (2023). [The Power of Parks to Promote Health](#). *Trust for Public Land*

<sup>10</sup> Jimenez, M. P. *et al.* (2021). [Associations between Nature Exposure and Health: A Review of the Evidence](#). *Int. J. Environ. Res. Public Health*, 18:4790.

Signed,

Alliance of Nurses for Healthy Environments  
American Lung Association  
Asthma and Allergy Foundation of America  
Medical Society Consortium on Climate and Health  
Physicians for Social Responsibility