



MASSACHUSETTS MEDICAL SOCIETY

Every physician matters, each patient counts.

October 7, 2021

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Rebecca Tepper, Esq.
Chief, Energy and Environment Bureau
Office of the Attorney General
One Ashburton Place, 20th Floor
Boston, MA 02108

Dear Chief Tepper:

The Massachusetts Medical Society (MMS), a professional association of over 25,000 physicians, residents, and medical students across all clinical disciplines, organizations, and practice settings, is committed to advocating on behalf of patients for a better health care system, and on behalf of physicians, to help them to provide the best care possible.

Over the past many years, through the thoughtful leadership of the Medical Society's physician Committee on Environmental and Occupational Health, the Society has increased its policymaking and advocacy on issues at the critical intersection of environmental justice and public health. MMS has passed policy on environmental health issues relating to climate change, air pollution, water quality, as well as a broad list of energy policies. The MMS recognizes the vital correlation of environmental justice and public health and the critical impact that environmental policy has on the health of the residents of the Commonwealth.

We write to encourage your continued vigilance in upholding of our ambient air quality standards, as your office plays a key role in the enforcement of environmental laws that protect our air. The Medical Society deeply appreciates the commitment and the dedication of your office to protecting public health by ensuring compliance with longstanding environmental laws. We commend your advocacy with other state attorneys general to the U.S. EPA last year calling on the agency to rescind its harmful policies rolling back environmental standards. We applaud your recognition of the potential impact of the EPA's policy on public health, especially the health of low income and historically marginalized racial and ethnic communities who are greater risk of suffering adverse outcomes from COVID-19. This is particularly important in light of a report issued by researchers at the Harvard T.H. Chan School of Public Health linking long term exposure to fine particulate matter with increased COVID-19 death rates.

While environmental oversight and enforcement has remained vigorous in Massachusetts, generally enforcement of the Clean Air act dropped by 50% during the first two years of the Trump Administration.¹ According to National Bureau of Economic (NBER) research out of Cambridge, after declining by 24.2% from 2009 to 2016, annual average fine particulate matter (PM2.5) in the United States in counties with monitors increased by 5.5% between 2016 and 2018 while at the same time we saw a dramatic decrease in oversight. Given the instability of consistent enforcement on the federal law, we must remain vigilant on the state level and therefore encourage you to continue to prioritize enforcement of clean air standards in Massachusetts.

¹ Environmental Crimes Project Report, 2020, available at https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3710109#.

Thank you for consideration of these important public health issues. We'd be most happy to connect to discuss further at your convenience.

Sincerely,

Carole E. Allen, MD, MBA, FAAP