



April 23, 2020

Mary Nichols, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Maintain Clean Air Progress to Protect Public Health

Dear Chair Nichols,

As health and medical organizations, we are intensely focused on slowing the spread and devastating health impacts of COVID-19. In these challenging times, we know how important public health precautions and protections are to all of us, and are encouraged by California's leadership in slowing the curve to protect our state.

In that vein, we also remain focused on, and committed to, protecting our communities from the ongoing threats of unhealthy air including as a protection against negative COVID-19 outcomes. This year marks the 50th anniversary of the Clean Air Act that has driven decades of progress and we know we have a long way to go so that all Californians can breathe clean air. For these reasons, we are extremely discouraged to see increasing – and familiar – calls by polluting industries to weaken, stall and delay critical clean air programs under the banner of COVID-19. At this time, we call on your continued leadership in protecting public health through strong, science-based and health protective clean air measures.

We know the air pollution burden falls greatest on our most disadvantaged communities and the challenges of climate change are making it harder to continue clean air progress. Released this week, the American Lung Association's State of the Air 2020 report is a clear indicator of the need for stronger actions to protect the public.¹ The report finds that almost all Californians – 98 percent – live in counties affected by unhealthy ozone and particle pollution, and 40 counties saw increased levels of pollution compared with last year's report. Extreme heat, catastrophic wildfires and other climate effects exacerbate the everyday burdens of diesel hotspots, gridlock and other major sources of pollution affecting Californians' health – and posing disproportionate risk to many Californians.

¹ American Lung Association. State of the Air 2020. April 21, 2020. www.lung.org/sota.

Children, seniors, people with respiratory and cardiovascular illnesses, lower income communities and people of color face heightened risks due to unhealthy air. The risks of unhealthy air to these and broader populations are well established,² and emerging evidence points to connections between harmful pollution and increased death rates due to COVID-19 infections:

- Harvard University's School of Public Health research from early April points to connections between long term exposures to particle pollution and elevated death rates due to COVID-19, concluding that "A small increase in long-term exposure to PM2.5 leads to a large increase in COVID-19 death rate, with the magnitude of increase 20 times that observed for PM2.5 and all-cause mortality."³
- Research published this week in Europe evaluated the correlation between high levels of nitrogen dioxide (NO₂) and COVID-19 deaths, noting that "...long-term exposure to [NO₂] may be one of the most important contributors to fatality caused by the COVID-19 virus..."⁴

These analyses add to the decades of research into the harms caused by poor air quality and the need for greater actions to reduce harmful pollution and exposures.

Our organizations encourage you to continue on with the implementation and development of the strongest possible controls on harmful air and climate pollutants to protect public health and secure ongoing progress toward healthy air for all Californians. Specifically, we ask that you maintain strong focus on reducing daily pollution burdens in our most vulnerable and disadvantaged communities which too often face a barrage of negative impacts of diesel freight pollution. The following programs now under development will make significant gains in reducing high levels of particle pollution and toxic air contaminants:

- **Ocean Going Vessels at Berth** and **Commercial Harbor Craft** rules will reduce cancer risk and premature deaths through stronger controls on ships at California ports and harbors.
- **Advanced Clean Truck** standards will spur the transition off of harmful combustion and toward more zero emission trucks, eliminating local impacts from drayage trucks at ports, local delivery vehicles and more.
- **Transportation Refrigeration Units** standards will tighten harmful exhaust limits and increase levels of zero emission equipment and operations to curb neighborhood-level diesel exhaust impacts.
- **Low NO_x Omnibus** truck emission standards will reduce the levels of pollutants allowed from heavy duty trucks to ensure this major source of harmful emissions is reduced to support attainment of health protective clean air standards.

Among other existing and planned rules, these programs represent hope for healthy air and reductions in harmful pollution caused by the transportation sector. We cannot slow our progress in the development of life-saving and health protective standards as we pursue a path to clean, healthy air for all Californians.

Sincerely,

² American Lung Association. Health Effects of Ozone and Particle Pollution. <http://www.stateoftheair.org/health-risks/>

³ Exposure to air pollution and COVID-19 mortality in the United States. Xiao Wu, Rachel C. Nethery, Benjamin M. Sabath, Danielle Braun, Francesca Dominici. <https://doi.org/10.1101/2020.04.05.20054502>

⁴ Assessing nitrogen dioxide (NO₂) levels as a contributing factor to coronavirus (COVID-19) fatality. Ogen, Yaron. Science of The Total Environment Volume 726, 15 July 2020, 138605 <https://doi.org/10.1016/j.scitotenv.2020.138605>

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