



June 19th, 2020

The Honorable Gavin Newsom
Governor, State of California
Capitol Building
Sacramento, CA 95814

Honorable Bob Wieckowski, Chair
Senate Budget Subcommittee 2 - Resources, Environmental Protection, Energy and
Transportation
Capitol Building
Sacramento, CA 95814

Honorable Richard Bloom, Chair
Assembly Budget Subcommittee 3- Resources and Transportation
Capitol Building
Sacramento, CA 95814

Re: Support for AB 617 Implementation Funding

Dear Governor Newsom, Chair Wieckowski, and Chair Bloom:

The undersigned organizations appreciate your willingness to consider \$50 million in implementation funding for Assembly Bill 617 (AB 617). In this letter, we describe the need for AB 617 to continue, especially under the COVID-19 pandemic. We detail the current status of various Community Emissions Reduction Programs (CERPs) across the state, and why implementation funding is critical to communities engaged in the process.

Underserved communities we work with are breathing some of the most polluted air in California and the country, and we are bearing the severe health, social, and economic costs associated with that pollution. Many recent studies show that these communities bear a higher risk of dying from COVID-19 because they breathe the highest levels of dangerous air pollution in the country. In particular, a recent study by Harvard University's School of Public Health found that a small increase in long-term exposure to particulate matter was associated with a 15 percent increase in the COVID-19 death rate.¹ The study further suggests that areas with higher

¹ See Xiao Wu, Exposure to Air Pollution and COVID-19 Mortality in the United States (preprint) <http://doi.org/10.1101/2020.04.05.20054502>; See <https://www.hsph.harvard.edu/news/hsph-in-the-news/air-pollution-linked-with-higher-covid-19-death-rates/>. We cite preprint studies undergoing peer-review due to the recency of COVID-19 pandemic.

pollution levels will have higher rates of hospitalization and death, and thus are where resources should be concentrated.² Another analysis found that nearly 80% of the deaths in Italy, Spain, France, and Germany occurred in the five most polluted regions based on nitrogen dioxide concentrations. The study concluded that long-term exposure to nitrogen dioxide “may be one of the most important contributors to fatality caused by the COVID-19 virus in these regions and maybe across the whole world.”³ Another study examining data from China, Italy, and the United States also found a correlation of higher mortality with poor air quality.⁴ Several other analyses conducted in England,⁵ China,⁶ and Italy⁷ have come to the same conclusion: air pollution increases the risk of dying from COVID-19. This significant and mere first wave of scientific literature points to the urgency and necessity of the state’s next actions: air pollution must be reduced to protect and save lives in the most vulnerable communities.

Most recently, the 2020 State of the Air Report by the American Lung Association found that California has the six most polluted cities in the country for ozone, the five most polluted cities in the country for year round particle pollution, and five of the top seven polluted cities for short-term particle pollution.⁸

As you are aware, the core purpose and intent of AB 617 is to reduce emissions and improve the air in the most impacted communities throughout California. This improvement is urgently needed now to address the significant health disparities and disproportionate impacts of COVID-19. Implementation funding is critical for ensuring that CERP planning and implementation processes across the state continue. Communities have invested and continue to invest significant resources into working on their CERPs, and losing implementation funding at this stage in the process would be a terrible step backwards at a time when we need to be urgently improving air quality in the most impacted communities. Not only is this funding crucial for reducing emissions, this funding is critical for providing the resources necessary to maintaining and strengthening adequate public processes, strong community involvement, and administrative support from CARB in CERP planning and implementation. Below, you will find

² See <https://www.hsph.harvard.edu/news/hsph-in-the-news/air-pollution-linked-with-higher-covid-19-death-rates/>.

³ See <https://www.sciencedirect.com/science/article/pii/S0048969720321215>.

⁴ See Riccardo Pansini, et. al., Initial Evidence of Higher Morbidity and Mortality Due to SARS-CoV-2 in Regions with Lower Air Quality, (preprint) <https://www.medrxiv.org/content/10.1101/2020.04.04.20053595v2>.

⁵ See Marco Travaglio, et. al, Links Between Air Pollution and COVID-19 in England, (preprint), doi: <https://www.cam.ac.uk/research/news/covid-19-severity-associated-with-increased-levels-of-air-pollution-in-england-preliminary-study> (finding that levels of some air pollutants are linked to COVID-19 cases and morbidity);

⁶ See Ye Yao, et. al, Spatial Correlation of Particulate Matter Pollution and Death Rate of COVID-19, (preprint) doi: <https://doi.org/10.1101/2020.04.07.20052142> (finding that “COVID-19 held higher death rates with increasing concentration of PM2.5 and PM10 in the spatial scale, which may affect the process of patients developed from mild to severe and finally influence the prognosis of COVID-19 patients”); Huaiyu Tian, et. al., Risk of COVID-19 Is Associated with Long-Term Exposure to Air Pollution (preprint), doi: <http://doi.org/10.1101/2020.04.21.20073700> (finding that an increase of 10 $\mu\text{g}/\text{m}^3$ in NO₂ or PM_{2.5} was found to be associated with an increase in the number of COVID cases and an increase in severe infection).

⁷ See Mario Coccia, Two Mechanisms for Accelerated Diffusion of COVID-19 Outbreaks in Regions with High Intensity of Population and Polluting Industrialization: the Air Pollution-to-Human and Human-to-Human Transmission Dynamics (preprint), doi: <http://doi.org/10.1101/2020.04.06.20055657> (finding that “[t]he accelerate and vast diffusion of COVID-19 in North Italy has a high association with air pollution”).

⁸ <http://www.stateoftheair.org/city-rankings/most-polluted-cities.html>

detailed information on various CERPs across the state that our members are engaged in, and why implementation funding is a critical component to success for these disadvantaged communities under the AB 617 program.

- **Boyle Heights / East Los Angeles / West Commerce Community CERP:** The community of East Los Angeles, Boyle Heights, West Commerce identified emissions from neighborhood and freeway traffic from trucks and automobiles, railyards, metal processing facilities, rendering facilities, and auto body shops as air quality priorities. The community also cited general concerns about industrial facilities in the community, including waste transfer stations. Thus, the CERP developed by the Community Steering Committee identifies some measures to reduce emissions, so it is critical that the AQMD has adequate funding to support the implementation of the CERP to improve public health in this heavily impacted community.
- **Richmond CERP & East Oakland CERP:** Communities in Richmond and East Oakland are looking forward to getting CERPs, and are doing pre-CERP work with the BAAQMD now. They will need state implementation funding to make sure the rug doesn't get pulled out from under them, as they have invested many resources into moving forward in the process and have had to wait in line for a CERP, despite being heavily impacted communities.
- **San Diego Portside CERP:** The San Diego Portside Environmental Justice Communities (“Portside”) CERP include the San Diego communities of Barrio Logan, Logan Heights, and Sherman Heights, and the west National City community. The Portside Steering Committee includes residents, medical experts, organized labor, environmental and social justice organizations, local industry, SDG&E, and representatives of local governmental agencies including the cities, the Port, our regional planning organization (SANDAG), and CalTrans. This Steering Committee has been meeting since October of 2018. For the first year of the program, the San Diego Air Pollution Control District (SDAPCD) set up an intensive monitoring program and compiled information on air emissions. This undoubtedly presents valuable air pollution data to drive decision-making. This year, the Portside Steering Committee is actively engaged in the important work of developing the CERP. *This work is in its most active phase*, as the groups are working together to identify regulatory, land use, technological, programmatic, and other strategies to reduce the impact of air pollution in Portside. *A failure to fund AB 617 implementation would pull the plug on this work and this collaboration, at the exact moment when it is most important that it continues in order to complete the CERP.* The CERP will guide the region in reducing the disproportionate and unjust burden of air pollution on these disadvantaged communities.

- **Shafter CERP:** Shafter is currently in the preliminary stages of implementing its CERP. The Community Steering Committee recognizes Valley Air's staff time and resources, and that these are needed to properly implement the CERP measures the Steering Committee spent countless hours advocating for. For example, the Steering Committee achieved both a pesticide pilot notification program and a pilot program designed to reduce emissions. The Steering Committee is committed to working closely with Valley Air in shaping and implementing both of these programs, and it is imperative that there is funding for Valley Air to do so. A failure to adequately fund the implementation of AB 617 would directly and negatively impact concerned community members who attended over 100 meetings in the past two years to achieve their CERP.
- **SouthEast Los Angeles CERP:** Communities in Southeast Los Angeles, which is in the CalEnviroscreen Red Zone, were just recently selected to start a CERP in their community and need implementation funding to support the development of strong measures to reduce emissions and an adequate air monitoring plan. Currently, the Community Steering Committee is identifying strategies and actions that address the main community concerns regarding rendering facilities, general industrial facilities, metal processing facilities, and railroads and locomotives. It is critical that the Air Districts are funded so they can provide strong support to the communities to ensure the CERP is truly guided by the communities main concerns and includes implementation of regulations and enforcement to generate real emissions reductions.
- **Wilmington / Carson / W. Long Beach CERP:** This area has the highest concentration of oil refineries and associated pollutants on the entire West Coast, and won a CERP for significant oil refinery emission cuts. However, the plan will mean nothing if it is not implemented, and will leave this community with continuing and expanding extreme fossil fuel pollution. Implementation funds are critical to realizing the emissions reductions these communities fought for in the CERP.

While the above communities need implementation funding to continue in their CERP processes, many other communities in dire need of air quality improvements have yet to be selected by this program. Additional funding, for implementation and otherwise, is needed to support successful execution of the mission of the AB 617 Community Air Protection Program. We appreciate the opportunity to support this program as it moves through the budget process, and look forward to continued collaboration with CARB to ensure significant emissions reductions and improvements in air quality in our communities and many others across California.

If you have any questions about this letter, please contact Neena Mohan, CEJA Action's Climate Justice Program Associate, at neena@caleja.org.

Sincerely,

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Paulina Torres, Center on Race, Poverty, and the Environment

David Flores, Environmental Health Coalition

Paula Torrado, Physicians for Social Responsibility - Los Angeles

CC: Rachel Wagoner, Deputy Legislative Secretary, Office of Governor Gavin Newsom
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