



April 24, 2020

Paul Van Konyneburg, Chair and Members
California Transportation Commission
1120 N Street, MS 52
Sacramento CA, 95814

Submitted via email: CTC@catc.ca.gov

Subject: Comment on COVID-19 Informational Items (Agenda Reports 7-12)

Dear Chair Van Konyneburg and members of the Commission:

The American Lung Association appreciates that the California Transportation Commission is hosting informational updates on the impacts of COVID-19 during its April 29 hearing. Ending this lung health pandemic is a top priority for our organization and we have launched major new initiatives to that end. We have also dedicated significant time and resources to educating the public via our online resources, staffed help line and weekly webinars to answer lung health questions and concerns. These resources are available at www.lung.org/covid19.

As the Commission considers the impacts of COVID-19 on the transportation sector, the recent reductions in traffic and pollution must also be considered as a learning opportunity towards a cleaner future. The transportation sector is the largest source of both harmful air pollutants and carbon pollution in California. This week, the American Lung Association released the annual *State of the Air* report¹ which documented widespread increases in ozone and particle pollution in California and across the United States. The California Air Resources Board estimates that 80 percent of California's smog-forming emissions are caused by the transportation sector, and approximately 5,400 Californians die prematurely each year due to particle pollution.² Further, exposures to unhealthy air add to risks for people with asthma, COPD, heart disease and especially for children, seniors, low income communities and people of color.

Despite decades of air quality improvements and life-saving policies reducing harmful emissions, we have a long way to go and a harder job ahead as our climate changes. The *State of the Air* 2020 report found 98 percent of Californians live in counties affected by unhealthy air. Seven of the ten most ozone-polluted cities in the United States are in California, along with six of the ten most impacted by unhealthy year-round levels of particle pollution. Correcting course requires significant reductions in transportation pollution through advanced technologies, reductions in diesel freight exhaust and healthier transportation choices that reduce vehicle miles traveled and associated traffic pollution.

The increases documented in the 2020 report were also driven by extreme heat, wildfires and other climate-related impacts. The most recent inventory of statewide greenhouse gas emissions noted ongoing increases in carbon pollution from the transportation sector – which is responsible for over 40 percent of California's climate pollution.³ Climate change is making it harder to protect public

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

² California Air Resources Board. 2020 Mobile Source Strategy Workshop Presentation. March 2020. https://ww3.arb.ca.gov/planning/sjp/2020mss/pres_marwbnr.pdf

³ California Air Resources Board. 2019 Edition: California Greenhouse Gas Emissions for 2000 to 2017. https://ww3.arb.ca.gov/cc/inventory/pubs/reports/2000_2017/ghg_inventory_trends_00-17.pdf

health and ensure healthy air for all Californians, again requiring specific focus on reducing transportation pollution.

Recent research is pointing to troubling correlations between unhealthy air and higher death rates due to COVID-19.^{4,5} These analyses add to the decades of scientific research into the harms of air pollution generally⁶ and transportation pollution specifically.⁷ We also know that these negative impacts fall disproportionately on communities most impacted by nearby sources of transportation pollution, including our ports, railyards, freight distribution centers, freeways and other hotspots of diesel exhaust.

Current reductions in harmful pollution and traffic caused by health-protective shelter in place orders provide an opportunity to evaluate the role of transportation choices on health. In the Commission's efforts to provide a sustainable transportation system, the current air quality conditions due to reduced transportation emissions can offer lessons for longer term health protection and sustaining clean air for all Californians.

High priority must be placed on envisioning a healthier, more sustainable transportation system as envisioned in Governor Newsom's Executive Order N-19-19. We see today what reductions in harmful pollution and vehicle miles traveled can mean to air quality, but we know that this temporary pause in fossil-fueled transportation impacts on public health will not last without strong actions to preserve these benefits. We must ensure the shift toward "funding transportation options that can contribute to the overall health of Californians and reduce greenhouse gas emissions"⁸ through alternatives to road expansion and other projects that increase traffic and associated negative air quality outcomes. We need greater efforts to rapidly shift transportation dollars toward healthier ends that offer greater mobility options, active transportation and zero emission infrastructure and that support transit systems now and as we come through the pandemic to ensure access and mobility for all Californians. We also know that standards to reduce harmful emissions from the freight sector must continue to be developed and implemented on schedule to protect lung health and build public health resiliency.

Given the fact that transportation sources are the leading source of pollution that threatens the health of Californians and makes communities more vulnerable to negative health and climate endpoints, we cannot delay in putting in place life-saving programs to reduce diesel hotspots, curb local air pollution and protect California's future.

We look forward to working with the Commission and staff to ensure a sustainable, healthy transportation system for all Californians.

Sincerely,



Will Barrett
Clean Air Advocacy Director
American Lung Association in California

⁴ 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>

⁵ 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>

⁶ American Lung Association. Health Effects of Ozone and Particle Pollution. <http://www.stateoftheair.org/health-risks/>

⁷ *Ibid.* Health Effects of Living Near Highways and Air Pollution. <https://www.lung.org/clean-air/outdoors/who-is-at-risk/highways>

⁸ Governor Gavin Newsom. Executive Order N-19-19. Sept. 2019. <https://www.gov.ca.gov/wp-content/uploads/2019/09/9.20.19-Climat-EO-N-19-19.pdf>