



## ALAMEDA-CONTRA COSTA MEDICAL ASSOCIATION

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February 23, 2021

David Joe  
Assistant Manager of the Rule Development Section  
Bay Area Air Quality Management District  
375 Beale Street, Suite 600  
San Francisco, CA 94105

Dear Mr. Joe,

The Alameda-Contra Costa Medical Association (ACCMA), representing over 5,000 East Bay physicians, is concerned about the negative health impacts that particulate matter (PM), especially PM<sub>2.5</sub>, has on our patients and community. PM<sub>2.5</sub> is hazardous to health; it is linked to lung damage, asthma, heart disease, cancer, adverse birth outcomes, cognitive impairment, and premature death along with increases in hospitalization, emergency department visits, and lost days of work and school.<sup>1</sup> Evidence shows that even with small increases in chronic PM<sub>2.5</sub> exposure, which is known to be emitted in substantial quantities from refineries, there is an associated 8% increase in county-level COVID-19 mortality rates after accounting for many area-level confounders.<sup>2</sup>

The California Environmental Protection Agency, World Health Organization, and other institutions have specified that there is no clear lower limit of safe levels of exposure to PM<sub>2.5</sub> particles, suggesting that current federal regulatory standards for PM<sub>2.5</sub> may not be adequate to protect public health. An estimated 2,000-3,000 lives are lost in the Bay Area each year from PM<sub>2.5</sub>.<sup>3</sup> In addition, the health impacts of PM<sub>2.5</sub> exacerbate existing racial- and socioeconomic-associated health disparities and disproportionately impact residents living in close proximity to refineries<sup>4</sup>, who already experience some of the worst health outcomes in our community.

As medical professionals who care for vulnerable and at-risk populations, including babies, children, young adults, and the elderly throughout the East Bay, we urge BAAQMD to protect the health of our patients and our community by requiring refineries to take steps to meaningfully and substantially reduce PM<sub>2.5</sub> emissions.

If you have any questions or wish to discuss these concerns, please contact Joseph Greaves, ACCMA Executive Director, at 510-654-5383 or [jgreaves@accma.org](mailto:jgreaves@accma.org).

Sincerely,

Suparna Dutta, MD  
ACCMA President

1. <https://ww2.arb.ca.gov/resources/inhalable-particulate-matter-and-health>
2. Wu, X., et al., 2020. Air pollution and COVID-19 mortality in the United States: Strengths and limitations of an ecological regression analysis. *Science advances*, 6(45), p.eabd4049.
3. <https://www.baaqmd.gov/~media/files/planning-and-research/research-and-modeling/cost-analysis-of-fine-particulate-matter-in-the-bay-area.pdf>
4. [https://www.baaqmd.gov/~media/files/board-of-directors/2020/ssc\\_presentations\\_12172020v2-pdf.pdf?la=en](https://www.baaqmd.gov/~media/files/board-of-directors/2020/ssc_presentations_12172020v2-pdf.pdf?la=en)