



May 26, 2016

Chairman Mary Nichols
California Air Resources Board
1001 I Street
Sacramento, CA 95819

Re: Public Health Urges Strong SLCP Action

Dear Chairman Nichols and Members of the Board:

On behalf of the undersigned health and medical organizations, we are writing to support the draft Short Lived Climate Pollution (SLCP) Reduction Strategy and call for bold targets for cutting these “super pollutants” by 2030. California’s leadership in reducing super pollutants is not only critical to the overarching fight for climate health, but also to reducing local smog and soot pollution that leads to illnesses, hospitalizations and even premature death. The climate crisis we are facing now, and the important role of black carbon, methane and f-gases in accelerating climate change call for strong and immediate action to reduce these pollutants. The targets, goals and measures in the draft strategy provide an important opportunity to make real progress in reducing harmful climate pollutants.

The growing scientific research and knowledge of the threats posed by unmitigated climate change support the need for state action. For example, the recent US Global Change Research Program report *“The Impacts of Climate Change on Human Health in the United States: A Scientific Assessment”* highlights current and future climate change impacts on public health. The report, released in April 2016, documents a growing list of climate impacts including air pollution, extreme heat, drought, wildfires, water and food security, expanded diseases, extreme weather and mental health impacts of climate change. These impacts will cause disproportionate harm to certain vulnerable populations that already suffer worse mental and physical health outcomes than the population as a whole, such as low-income residents, communities of color and seniors. ARB’s SLCP Strategy is an important response to this growing documentation of immediate and future climate health impacts.

We support the proposed combination of regulatory measures, incentive funding, and phase out of harmful pollutants that represent immediate health risks and long-term climate health impacts. Black carbon is a component of diesel exhaust, which remains the greatest outdoor air pollution cancer risk

factor facing Californians and contributes to a wide range of respiratory and cardiovascular impacts, including premature death. Black carbon generated by residential wood burning represents another serious local health risk in terms of respiratory and cardiac health and even new EPA certified wood stoves can emit significant levels of pollution. Reducing methane emissions can provide important reductions in other harmful co-pollutants as well as cutting the formation of ozone. Reducing emissions from these and other super pollutant sources will result in health benefits including the following:

- cutting heart and lung disease, cancer risk and premature deaths associated with diesel exhaust
- improved local air quality through reductions in ozone and particle pollution
- reducing local health impacts of residential wood smoke
- reducing food insecurity and food waste through organic diversion from landfills
- improvements in groundwater quality that improve health

As you move forward toward adoption of the SLCP strategy, we urge you to consider the following:

1) We urge CARB to maintain a strong focus on regulatory approaches that cut super pollutants and improve health. We applaud the plan's reliance on regulatory approaches as these strategies will provide the most certain and ongoing emission benefits for California and provide a strong model for action by other jurisdictions. We continue to support Governor Brown's \$215 million budget proposal to support incentives for short lived climate pollutant reductions (wood smoke, commercial refrigeration, organic waste diversion and healthy soils) as a complement to a strong regulatory program.

2) We urge a strong emphasis in the strategy on transitioning the freight and off-road equipment sectors to zero emission technologies as broadly and rapidly as possible. The freight and off-road equipment sectors are the major sources of black carbon emissions and health impacts that slow our progress to meet health based federal standards and impact communities now.

3) We support action to reduce wood burning for residential heating and applaud CARB's recommendation to work with air districts to move away from wood burning devices altogether. We encourage CARB to work with local air districts to align regulatory efforts and *incentive programs with the goal of replacing wood burning with cleaner alternatives as the Bay Area Air Quality Management District has done.* Toward this end, we request that CARB focus incentive funding on these cleaner alternatives, including electric heating devices, instead of wood burning devices. As in the freight sector, we support a system-wide shift to the cleanest zero-emission technologies everywhere possible.

4) We urge CARB to move forward quickly with regulatory requirements to achieve critical methane reductions from the dairy, waste and oil and gas sectors. While committing to help accelerate early actions in advance of regulatory requirements, regulatory certainty is critical to ensuring that methane emissions reductions are achieved as rapidly as possible from all major sources, and in ways that protect local health. We support CARB's plans to move forward to finalize methane reduction regulations for the oil and gas sector as planned in 2016 and to begin developing health and climate-protective regulations as soon as possible to reduce methane from dairy and landfill operations.

5) Health leaders strongly support legislative action to codify the strategy's goals. Over 34 health organizations and health experts have expressed strong support for SB 1383 (Lara) that would place

CARB's proposed super pollutant targets into statute and underscore the priority of these efforts, while providing a clear legislative model for other jurisdictions to follow.

We appreciate the state's leadership and the ARB's continued focus and recognition that the climate and local air quality challenges are intertwined and must be addressed simultaneously to reduce the risk of respiratory, cardiac, cancer and other health impacts from climate change. The SLCP Strategy highlights this convergence and we look forward to continuing to work with the ARB as the plan is developed and finalized.

Sincerely,

Bonnie Holmes-Gen
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American Lung Association in California

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