



May 21, 2014

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

Public Health and Medical Support and Recommendations for AB 32 Scoping Plan Update

Dear Chairman Nichols,

On behalf of the undersigned members of California’s public health community, we write to provide comments on and to support the adoption of the AB 32 Scoping Plan Update. We appreciate the staff’s hard work on the draft plan and recent efforts strengthen the draft and increase protections for all Californians from the worst impacts of climate change. We believe that the Scoping Plan is an important public health document because it sets the course for steady, strong climate actions that will move California away from polluting energy sources, reduce the risk of public health emergencies and maintain California’s leadership on climate change into the future.

As noted in the draft Scoping Plan Update, “Climate change has been identified as the greatest health threat of the twenty-first century.” Evidence to support this statement grows clearer by the day. In March, the United Nations Intergovernmental Panel on Climate Change released its Fifth Climate Assessment report explaining the many challenges and unsettling future we now

face due to climate change. And, just this month, the United States Global Change Research Center issued its third National Climate Assessment focusing on the grave threats climate change is presenting in the United States:

Key weather and climate drivers of health impacts include increasingly frequent, intense, and longer-lasting extreme heat, which worsens drought, wildfire, and air pollution risks; increasingly frequent extreme precipitation, intense storms, and changes in precipitation patterns that lead to drought and ecosystem changes; and rising sea levels that intensify coastal flooding and storm surge. Key drivers of vulnerability include the attributes of certain groups (age, socioeconomic status, race, current level of health...) and of place (floodplains, coastal zones, and urban areas), as well as the resilience of critical public health infrastructure.¹

Our organizations view California's leadership as critical to protecting and preparing Californians against the worst health impacts of climate change. We support CARB's efforts to bring forward the next chapter in California's climate efforts and offer the following recommendations to enhance the health protections of strong climate actions.

Protecting health through a 2030 emission reduction target The draft Scoping Plan Update highlights the need to move forward with overall and sector-specific greenhouse gas (GHG) reduction targets beyond 2020. We believe that an overall 2030 emission reduction target is needed to ensure long-term protections for all communities and to ensure that near term actions keep California on the right track for achieving long term climate protection goals. In order to safeguard health in the long-term, we must ensure rapid reductions over the next 35 years.

Evaluate and broadcast the co-benefits of AB 32 programs CARB should expand its work to quantify and highlight the public health co-benefits of AB 32 measures, especially in our most disadvantaged communities. Zero emission energy, transportation, smart growth planning, reductions in black carbon and other climate pollutants all hold the possibility of local, near-term health benefits to Californians. For example, the Strategic Growth Council's ongoing review and update of the *UrbanFootprint* land use planning model to better inform local planning decisions on the health benefits of strong SB 375 implementation strategies is a key tool to be supported and used to provide the public with tangible benefits of California's climate leadership. The Scoping Plan Update should clearly support state, regional and local jurisdictions' use of health evaluation tools for all policies, and to broadcast those benefits to the public.

Protect health through clean, healthy transportation options The Scoping Plan should move California forward as quickly as possible to zero-emission transportation. We

¹ Luber, G., K. Knowlton, J. Balbus, H. Frumkin, M. Hayden, J. Hess, M. McGeehin, N. Sheats, L. Backer, C. B. Beard, K. L. Ebi, E. Maibach, R. S. Ostfeld, C. Wiedinmyer, E. Zielinski-Gutiérrez, and L. Ziska, 2014: Ch. 9: Human Health. Climate Change Impacts in the United States: The Third National Climate Assessment, J. M. Melillo, Terese (T.C.) Richmond, and G. W. Yohe, Eds., U.S. Global Change Research Program, p. 221. doi:10.7930/JOPN93H5.

appreciate that the draft Scoping Plan Update plans for a near term review of greenhouse gas reduction targets for the transportation sector. Transportation programs like the SB 375 sustainable communities strategies and regional targets and the Low Carbon Fuel Standard are critical to reducing the harms of traffic pollution and dependence on dirty fossil fuels, early action is clearly needed to ensure long-term air quality, active transportation and overall health benefits to Californians. These include reductions in air pollution related diseases such as asthma, emphysema, heart disease, diabetes and cancer.

In addition to the much needed transition to zero emission passenger technologies, the Scoping Plan Update should also strongly support the rapid development of zero and near-zero emission technologies in our heavy duty freight sector through a strong Sustainable Freight Strategy and increased investment in clean transit buses and programs to increase transit ridership for all income levels. Clean air benefits of transportation sector climate actions must be targeted to California's most disadvantaged communities most impacted by pollution from freeways, port traffic, rail yards and distribution centers.

Move forward now to reduce black carbon, methane and other short lived climate pollutants

CARB should move forward quickly to bring together advisors to formulate the path forward on regulating Short Lived Climate Pollutants that threaten air quality and our climate today. We applaud the Draft Scoping Plan's focus on further reducing black carbon from diesel and other combustion sources, methane, ozone and refrigerant gases. We need to act quickly to account for and remove these pollutants from neighborhoods throughout California and from our atmosphere. Doing so will provide immediate health benefits and provide a boost to California's leading efforts to protect the health of all Californians, including disadvantaged communities, against the worst impacts of climate change by quickly eliminating these potent pollutants.

Target zero emission energy solutions as quickly as possible California must pursue all clean energy options in the near term. We cannot afford to continue to install and rely on fossil-fueled energy sources if we are to protect against the worst impacts of climate change. The Draft Scoping Plan should move California quickly toward more energy efficiency programs, renewable energy integration and storage and other innovative approaches to clean energy. California should establish a clear target and plan to achieve zero emission energy sources as quickly as possible to support near- and long-term climate and air quality goals.

As members of California's health and medical community, we believe that we must take all actions to rapidly transition to clean energy and transportation solutions to protect the public from climate impacts. We support the California Air Resources Board's leadership in developing strong programs to reduce climate pollution and look forward to working toward continued efforts to protect all Californians through cleaner technologies and healthier communities more prepared for our current and future climate challenges.

Sincerely,

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