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August 1, 2013

David Mallory
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814
P.O. Box 2815
Sacramento, CA 95812

Re: Public Health Coalition Comments on 2013 Scoping Plan Update

Dear Mr. Mallory:

On behalf of the American Lung Association in California I am writing to provide our comments on the 2013 update of the AB 32 Scoping Plan. The American Lung Association in California has been a strong supporter of AB 32 as critical to improving air quality and public health in California and we look forward to engaging in this update process. We believe this update should have a strong focus on the effectiveness of AB 32 programs to date, the need for continuing strong action moving forward beyond 2020 and the critical importance of AB 32 for improving the health of the people of California, especially our most disadvantaged communities.

The Scoping Plan update must tell the story of why the strongest possible climate programs are so important to public health, especially to our most vulnerable citizens and communities both today and for future generations. Clearly, it is vital to the success of AB 32 that all Californians understand the real and growing threats facing our state and the health of its residents, including increased air pollution, devastating wildfires and smoke impacts, more frequent and severe heat waves and other health emergencies associated with climate change.

It is also vital that Californians understand the tremendous record of success already established with AB 32. Since its adoption, AB 32 has been very successful in beginning the necessary transition to clean alternative fuels, technologies, and energy sources. The 2013 Scoping Plan update needs to both document and build on this initial success. Major AB 32 programs, including the Low Carbon Fuel Standard, the Advanced Clean Cars program, SB 375 and others provide significant climate benefits and a wide range of benefits from cleaner air to reductions in chronic illnesses through healthier, more sustainable communities.

In support of these goals, we offer the following recommendations for developing a Scoping Plan update that illustrates and maximizes the health benefits of taking the strongest possible action on climate change:

Overall Scoping Plan Comments

An in-depth assessment of the health benefits of existing AB 32 programs to date, and the health benefits of measures going beyond 2020, must be conducted. As with the first Scoping Plan, the 2013 update should seek to quantify the health benefits in monetary and human health terms of AB 32 implementation. The 2008 Scoping Plan was projected to remove 76 tons per day of harmful ozone-forming and particulate pollutants, avoiding over 700 premature deaths, 76,000 lost work days and more than \$4 billion in annual health costs. A more complete evaluation of the benefits of AB 32 programs, as well as the health costs of inaction due to extreme heat events, wildfires, increased ozone and pollen, and impacts on allergies and asthma, and other health disasters is needed to illustrate the importance of strong climate action.

In conducting this evaluation, it is critical that the 2013 Scoping Plan project health benefits of both existing and new programs that extend beyond 2020. For example, the Scoping Plan should evaluate the full suite of health benefits associated with the Advanced Clean Cars program (fully implemented in 2025) and SB 375 Sustainable Communities Strategies, and other programs that extend beyond the 2020 timeframe. The American Lung Association's 2011 "Road to Clean Air" report found that the 2025 Advanced Clean Cars package could result in over \$7 billion in annual health and other societal benefits when fully implemented. Similarly, traffic pollutant reductions under SB 375 could prevent at least 16,000 asthma attacks and \$16 billion in health and other societal costs between now and 2035 in Southern California. The health benefit assessment of SB 375 should not be limited to respiratory health benefits, but should account for reductions in chronic disease rates in such areas as obesity, heart disease and cancer associated with more active transportation options. CARB should support the development of tools and methodologies, including the Urban Footprint model, to assist local governments in quantifying the health and climate benefits and impacts of transportation and land use decision making.

Cap and Trade Revenues

Plan for Investment of AB 32 Cap and Trade revenue benefits in the Scoping Plan Update. As the state moves forward in the discussion of the use of Cap and Trade auction revenues to support greenhouse gas reduction programs, it is important that the Scoping Plan update provide the expectation that these funds will provide additional benefits to local communities and to the state as a whole. The Scoping Plan should demonstrate the benefits that will accrue to disadvantaged communities through compliance with SB 535 investment requirements, greater investment in clean vehicle programs like the California Vehicle Rebate Program and focused investment to support local government implementation of regional SB 375 Sustainable Community Strategies.

Transportation and Land Use Sector

Emphasize and support early commercialization of zero emission transportation technologies and low carbon fuels. This is a major goal of the public health community due to the great opportunities to protect and improve lung health through the fundamental transition away from dirty fuel choices and toward advanced biofuels and battery electric and hydrogen-fueled vehicles. Early commercialization and deployment of alternative fueling infrastructure, more efficient and zero emission freight technologies, a growing diversity in the low carbon fuels market and maintaining the stringency of the Advanced Clean Car and ZEV programs through 2025 will have immediate health benefits and set the stage for long-term success. The Scoping Plan update should provide a vision for early commercialization, opportunities for investment in new zero emission technologies, incentives and stronger targets for cleaner fuels and vehicles in the interim decades between 2020 and 2050.

Support higher SB 375 regional targets and greater reductions as land use plans are implemented. The initial Sustainable Communities Strategies have been adopted in most regions of the state, and are being now developed in the Valley for adoption in the spring of 2014. The first round of SB 375 implementation has demonstrated that the regions are working together and able to plan for healthier communities. To date, several regional SCS plans have even exceeded their SB 375 targets for per capita greenhouse gas reductions, and early modeling runs indicate that several Valley SCS plans will do the same.

Clearly, these targets are achievable and must be re-evaluated to ensure that the regions are achieving long term greenhouse gas reductions from driving and are continuing to push for innovative ways to promote alternatives, and reduce sprawl and associated pollution. The Scoping Plan update should clearly reflect that the regions are building off of a foundation that did not exist in 2008, and should stress the importance of local implementation of those plans. The Scoping Plan should set the expectation that the regional targets being reviewed in 2014 will achieve greater GHG reductions in future plans and CARB should commit to even greater coordination with the regions to achieve this goal.

Short-Lived Climate Pollutants

Report on progress to date and establish a framework for additional reductions in short-lived climate pollutants. Reducing short-lived climate pollutants is critical to fighting climate change and offers real, local, near-term climate and public health benefits. The Scoping Plan update should include a section focused on this important greenhouse gas reduction priority. The plan should both evaluate and highlight the efficacy of existing California pollution reduction programs in reducing short-lived climate pollutants and recommend areas where additional reductions in short-lived pollutants are feasible. In addition, the Scoping Plan should provide a list of additional regulations and strategies needed to eliminate short-lived climate pollutants from our atmosphere along with existing carbon dioxide-based programs.

Focusing on these pollutants will achieve immediate, local health and climate benefits which will provide the greatest benefit to environmental justice communities most affected by air pollution, a key priority of the scoping plan goals. It will also provide a strong educational tool to educate the public and policy-makers on the near term benefits of reducing non-CO2 gases. The Scoping Plan should focus on progress to reduce methane, carbon monoxide, ozone, black carbon, F-gases and other non-CO2 gases, and identify concrete action steps (*e.g.* a scientific advisory panel) to move forward with additional programs in the near future.

Thank you for considering these recommendations as you prepare the draft Scoping Plan update. We look forward to reviewing the draft document in August and to working with you as the planning process moves forward.

Sincerely,

A handwritten signature in black ink that reads "Bonnie Holmes-Gen". The signature is written in a cursive, flowing style.

Bonnie Holmes-Gen
Senior Director, Policy and Advocacy