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Comments of Bonnie Holmes-Gen  
Senior Policy Director, American Lung Association of California  
Re: Draft CARB Scoping Plan Release  
June 26, 2008

The mission of the  
**AMERICAN LUNG**  
**ASSOCIATION®**

California is to prevent  
lung disease and promote  
lung health.

Improving Life,  
One Breath At A Time

The American Lung Association of California applauds the California Air Resources Board's (CARB) tremendous dedication and effort to bring this draft Scoping Plan to the board today. This Scoping Plan is a first key step toward moving our society toward a sustainable energy economy and clean and healthy air. We strongly oppose the proposals by the Senate Republican Caucus and the oil companies to delay efforts to reach our AB 32 goals. Without dramatic changes in our society and economy to reduce global warming, California's already severe pollution problems will only get worse.

The public health crisis in California caused by the state's dependence on polluting petroleum fuels is a key reason why we must move forward quickly. Moving away from petroleum fuels through strategies to clean up vehicles and fuels, change land use patterns, promote alternative transportation modes and other greenhouse gas reduction strategies can have tremendous co-benefits in attacking our smog and toxic air pollution problems while reducing the warming of the planet. With asthma at epidemic levels and thousands of premature deaths, hospitalizations and illnesses caused by pollution each year, California must move forward quickly. The cost of doing nothing is too great.

The American Lung Association appreciates that the draft scoping plan incorporates many strong and forward-looking elements. We are especially pleased to see a significant commitment to renewable power production in California through the inclusion of a goal of achieving 33% of the state's power through renewable sources. We are also pleased to see that the plan has a strong foundation in regulatory approaches that provide the most certainty with regard to achieving greenhouse gas emission reductions and providing the most accountability to the public. In addition, the plan anticipates further reductions in vehicle greenhouse gas emissions through an updated Clean Cars law.

As the board moves forward toward public discussion and further refinement of the draft scoping plan, we urge the board to ensure that the plan is solidly based on the premise of public health protection. We believe that protection of public health should be the key test applied to the various policy tools and



strategies that are part of the scoping plan, and more work should be done to better evaluate and quantify, where possible, the public health benefits. The board should pay particular attention to the following:

- 1) Ensuring that the plan contributes to faster progress toward meeting the state's clean air commitments with regard to smog and particle pollution, and ensuring that no elements of the plan allow for backsliding on achievement of state and federal air quality standards.
- 2) Maximizing the air quality and public health co-benefits of all regulations and strategies for greenhouse gas reduction included in the plan, and
- 3) Paying particular attention to measures that can achieve early reductions and improve air quality in communities already suffering from high levels of exposure to smog and toxic pollution from ports, goods movement, industrial polluters and other hot spots.

A strong emphasis on public health protection also calls for a very cautious approach to inclusion of any market-based measures. If the board does choose to include market-based measures to achieve greenhouse gas reductions, we believe these measures should be limited in scope, carefully designed to provide real, quantifiable and surplus reductions, maximize criteria air pollutant co-benefits, provide near-term benefits to local communities in terms of emission reductions and mitigation funds and include a strong enforcement program.

Finally, I would like to comment that we believe the board should commit to stronger measures in the transportation sector to meet 2020 greenhouse gas reduction targets and to lay the groundwork for the state's 2050 targets. We support strong regional greenhouse gas reduction targets for the land use sector to push regional and local governments to step up their efforts to change land use patterns, support transportation alternatives and reduce vehicle miles travelled and petroleum use. We also strongly support the need for accelerated efforts to introduce zero emission vehicles and bring ultra-low carbon fuels into the California market.

The American Lung Association applauds CARB's effort to date on this groundbreaking state greenhouse gas plan and looks forward to continue working with you to ensure the plan is strong, health protective, and provides a solid framework for success in reaching the state's 2020 goals.