David Mallory

California Air Resources Board

1001 "I" Street

Sacramento, CA 95814

P.O. Box 2815

Sacramento, CA 95812

**Re: 2014 Scoping Plan Update Comments**

Dear Mr. Mallory:

On behalf of Regional Asthma Management and Prevention, We are writing to offer our recommendations based on the latest draft of the 2014 AB 32 General Scoping Plan update. Regional Asthma Management and Prevent project based in Oakland, California has been an ardent supporter of AB 32 programs since its inception. We seek to strengthen it goals and objectives to provide clean air for all Californians. We are particularly concerned with the implementation and enforcement AB32 as it applies to low income communities and communities of concern. It is important that the most disadvantaged communities and impoverished citizens benefit directly from the investments that are part of the generated revenue established to address community interests. We greatly appreciate the good work that California Air Resources Board (CARB) and et al have done to establish and implement AB 32. The goal is to get it right and be willing to make the hard choices of steering the ship in the right direction by changing course as needed to better serve those disadvantaged communities. Since its adoption, we have seen programs SB 375, Zero Emissions Vehicles, Low Carbon Fuels Standards and Complete Streets as essential in creating a strong foundation for building healthy communities. The General Scoping Plan update offers an opportunity to both examine programs that are working and programs that need to be reevaluated for feasibility to best serve the public’s interest.

We thank the CARB and multi-agencies for all of their efforts to keep us informed and to update in this process. We have recommendations that focus on the following:

***Community Benefits Investments*:** Ensure the priority of CT revenues go directly to the areas where disadvantage communities will benefit from public safety programs, healthy community programs such as the bikes, weatherization and energy appliances, without having to move from the invested communities. This strategy achieves 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.

***Inclusion of health promoting language as criteria in the 2030 Interim Targets*:** Establishing clear strong health promoting language as criteria for evaluating investments in transportation infrastructure and residential developments. This strategy will ensure feasibility of investments based upon health criteria and achieve interim targets beyond 2020. California maintains momentum to achieving its 2050 climate goals. The development of the interim target should be a clearly defined, public process.

We offer the following recommendations to promote enhanced protection of public health while ensure strong, clear climate action through the 2014 Scoping Plan update.

* **Invest Carbon Trading Auction Revenues**

Last year the Governor’s action of appropriating $500 million of revenues for the General Fund seriously impaired the needed investments in programs, technologies, and developing industries that could have been used the funds to promote green tech companies, sound mitigation and adaptation programs in disadvantaged communities as it was intended.

* ***Specifically invest in the Sustainable Communities Strategies that focus on the transportation sector and potential land use conflicts as it applies to priority development areas and the adverse impacts of displacement of existing communities. This would create healthy development for disadvantaged communities to benefit from investments and achieve interim and long-term climate goals at the same time*:** Revenues generated by the Cap and Trade program should be invested in programs that actually reduce Vehicle Miles Traveled and promote Active Transport alternative programs. The transportation sector is expected to generate 40% of greenhouse gas emissions for the state. We should prioritize public health and safety investments in existing disadvantaged communities, those communities in need that have been targeted for transit oriented and infill development. Health consequences from transportation and fuel sources have been long overlooked and not factored in when considering investments. RAMP supports investing a commensurate share of Cap and Trade auction revenues in projects that link land use and public health. This strategy will generate better long-term outcomes and higher GHG emission reductions.

***Create a Community Investment Board (CIB) chaired by selected community members to oversee the CT revenue investment program to reduce GHG emissions in disadvantage communities and meet AB 32 Goals***: **T**his CIB will have the authority to review ALL developments, infrastructure projects, mitigation and adaptation programs, technologies and strategies that are eligible to receive Carbon Trading Revenue funding. The CIB should have the authority to make recommendations about whether projects or programs should be approved based on actual verifiable emission reductions, mitigation and adaptation benefits in designated disadvantaged communities. The CIB will work with ARB staff and technical experts to review all proposed and eligible projects and programs.

The CIB members should have a 2-year term limit and be selected by communities of concern. The goal is to establish a third party to ensure oversight of validation of investments and GHG reductions.

* **Evaluate adverse local impacts that may develop from Offset investments**:

Pending current research from FOE unpublished report.

Through SB 375, regional agencies throughout the state have developed Sustainable Community Strategies to leverage these coordinated transportation and land use strategies and meet long term GHG reduction goals.

This will be key in both meeting the state’s 2050 goals and creating efficient and well-maintained transportation networks statewide.

Thank you for considering these recommendations as you prepare this Scoping Plan update. We are available for a more in depth discussion regarding our recommendations. We look forward to working with you toward improved public health and safety and strengthen productive strategies that promote community benefits for disadvantage communities during the next phase of the implementation of AB 32.

Respectfully Submitted by

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*Working together to reduce the burden of asthma*