



A Voice for Nurses. A Vision for Healthcare.



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May 19, 2014

California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

Dear Governor Brown, ARB Chairman Nichols and ARB Board,

On behalf of 86,000 California registered nurses and our patients, we write in support of the five priority recommendations of the Environmental Justice Advisory Committee (EJAC) to the AB32 Scoping Plan Update. Integrating these elements into the fabric of the State's climate program would aid in fulfilling the stated intent of the legislation and at the same time address some of its deficiencies, particularly as regards the disparate health and environmental burdens of those communities most adversely impacted by industrial pollution, environmental contamination, and climate change.

In addition to the specific recommendations outlined below, CNA firmly believes that no scoping plan would be complete without addressing the fundamental need to preserve and fully fund our state's public health and emergency services infrastructure. This dimension should be factored into the consideration and implementation of the above recommendations as well as all applicable elements of the final AB32 Scoping Plan Update.

Briefly, the priority recommendations that should be adopted are the following:

1. Assess the benefits and problems of AB32 in the most impacted communities:
Collect, assemble and distribute the data on GHGs, criteria pollutants, air toxics, allowances and offsets from over 800 reporting stationary sources by the end of 2014 and complete the analysis by June of 2015. Share data with OEHHA, DPH, CEC and other agencies as appropriate to explore options and determine present and potential impacts on disadvantaged communities using various indicators and establish a baseline for future comparisons. One critical indicator among assessment criteria must be access to health care, particularly hospital emergency services.
2. Set an aggressive and accelerated reduction curve beyond 2020 because of the critical importance of pursuing early reductions. California should establish 2030 (a minimum reduction of 40% of 1990 levels) and 2040 (a minimum reduction of 60% of 1990 levels) emissions reduction targets.
3. California must reduce its energy use and transition to 100% renewable energy. Prevent new oil and gas operations (refineries, power plants) and unconventional fuels (fracking, tar sands, oil by rail, biomass incineration, waste to energy, artificially induced geothermal wells) from coming online because it adds GHGs and pollution rather than reduces them. Unanticipated consequences of currently deemed renewable energy under the RPS must be evaluated (life cycle emissions, co-pollutants) by the CEC to ensure they do not create new problems in overburdened communities. The CEC should then render ineligible those technologies that

increase air quality burdens. The CEC should ensure that imported renewable energy, including that from Tribal lands, is consistent with California requirements.

4. Financially support transit operations and restoration of transit service and routes in disadvantaged communities. The Plan should recognize and promote the GHG reduction and co-benefits of providing free youth transit passes for public school students and low cost transit service for low-income families.
5. Reduce the weaknesses of the Cap-and-Trade program by selling all allowances, not extending transition assistance to the industrial sector with free allowances, canceling or disallowing the offsets program (especially REDD, methane capture from dairy digesters and coal mines, rice, forestry clear cutting) and not exporting this scheme to other jurisdictions.

We urge you to incorporate the EJAC recommendations into the final Scoping Plan and work with the EJAC to ensure we achieve the multiple goals of AB 32. In so doing, you can count on the support and engagement of CNA nurses, for whom environmental and climate justice is of vital importance and fundamental to our mission of advocacy for the health and wellbeing of all.

Sincerely,

A handwritten signature in black ink that reads "Fernando Losada" with a small mark at the end.

Fernando Losada, Director of Environmental Health and Climate Justice