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**Preferred Scenario:**

Due to the urgency of meeting climate targets as soon as possible, I urge CARB to select Alternative One, direct regulation without cap and trade, as the basis for the scoping plan.

* California's most clear-cut successes in emissions reduction to date have come from measures such as the RPS and energy efficiency, which involve direct interventions to reduce emissions
* the mandate of AB197 for Environmental Justice is most readily fulfilled through the direct California based emissions reduction measures in Alternative One
* Since Alternative One includes direct emission reductions in California, resulting in decreased criteria and toxic air pollutants and decreased diesel emissions in California (compared with cap and trade scenarios) this scenario will have greater direct health cost savings compared to the other scenarios due to decreased California health costs.

**Incorporate cost savings of health co-benefits in economic analyses:**

CARB should identify obvious well-documented direct health co-benefits of scoping plan measures. The costs savings from these direct health co-benefits should be incorporated into the economic analyses. Specifically:

* CARB should improve the accuracy of the cost figures by including direct health benefits of avoided criteria and toxic air pollutants, especially in the Pathways analysis which is critical for comparing feasibility and cost of different measures to achieve GHG reductions (eg Scoping Plan table III-3, page 65 the cost of refinery controls and the RPS would be substantially lower if the cost savings for decreased medical care costs were included).
* CARB should include cost savings from avoided cardiovascular diseases, breast cancer, diabetes, depression and premature mortality due to increased physical activity from effective active transportation solutions more accurately valuing active transportation.
* CARB’s cost analysis of different measures and scenarios should include the savings from avoided cancer cases due to decreased diesel particulates.

**Coordination and Accountability:**

CARB working with partner agencies should establish processes which assure policy goals are incorporated into agency actions.

* **Specifically CEC and CPUC should be held accountable for their role in meeting California’s climate goals. For example,** the default approach in California should be **no further approvals of new fossil fuel generating and/or gas storage capacity without a required review** to assure projects fully incorporate updated demand forecasts and the latest information on Distributed Energy Resources that could meet the accurately estimated demand.  Such a proactive approach could both avoid unnecessary fossil fuel generation emissions, and save ratepayer funds.