



AMERICAN LUNG ASSOCIATION IN CALIFORNIA
 333 HEGENBERGER ROAD, SUITE 450, OAKLAND, CA 94621
 phone: 510.638.5864 | fax: 510.638.8984

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Mary Nichols, Chair
 California Air Resources Board
 1001 I Street
 Sacramento, CA 95814

Subject: Comments on the Proposed 2030 Scoping Plan

Dear Chairman Nichols,

On behalf of the American Lung Association in California, I am writing to submit the following comments as the California Air Resources Board develops the 2030 Scoping Plan to curb climate change pollution. California’s ongoing leadership in setting the standard for global action on climate change is invaluable and must continue at an accelerated pace.

It is vital to the future of public health in California and across the globe that we continue to demonstrate that strong climate actions support health, the environment and the economy. The Proposed Scoping Plan offers a strong start in achieving California’s climate and air quality goals, and we support strengthening key programs to maximize greenhouse gas reductions and community health benefits going forward, including:

- Accelerating local emission reductions from industrial sources
- Increasing ZEV technologies in light and heavy duty on- and off-road sectors
- Accelerating low carbon fuels requirements in the transportation sector and renewable energy deployment in the electricity sector
- Aligning land use and transportation policies and funding with pollution reduction goals

These actions are urgently needed. The National Oceanic and Atmospheric Administration recently reported 2016 as the warmest year the planet has experienced since record-keeping began in 1880.¹ We view the 2030 Scoping Plan as a critical opportunity to set the path forward for combatting climate change and its many health impacts, particularly for communities most affected by poor health and environmental conditions today. As noted in the 2015 *Lancet Commission* report, “Responding to climate change could be the greatest global health opportunity of the 21st century.” The American Public Health Association has declared 2017 as the “Year of Climate Change and Health” to raise awareness of the serious threats posed by climate change, providing more significance to CARB’s actions this year.

We encourage the Air Resources Board to maintain the necessary sense of urgency in its global climate leadership and focus on local public health improvements through the 2030 Scoping Plan document. We appreciate the work of the staff to increase awareness of these health considerations through the development of the public health evaluation and quantification of the health costs and benefits of the various proposed and alternative elements of the plan. In this spirit, we offer the following recommendations:

Industrial Pollution Reductions to Benefit Local Communities. With the passage of Assembly Bill 197 (E. Garcia, 2016) promoting local emission reductions should be a key foundation of California's climate policies. We encourage CARB to take serious note of the recent reports^{1,2} highlighting the disproportionate siting and impacts of industrial pollution sources in low income communities of color. While preliminary, these studies point to the need for ongoing attention and correction as new data becomes available:

- **Cap and Trade:** Maintain the Board's direction to reduce free allowance allocation under the Cap and Trade program amendments now being developed. If the program is to remain in place, CARB must provide more assurance that facilities in the program will continue to modernize and ratchet down emissions, and CARB must require sources to track and fully mitigate any localized pollution increases caused by the Cap and Trade program through Adaptive Management or other programs. CARB should develop possible regulatory amendments to reduce local impacts of trading, offsets or other factors. The cap and trade program should include fewer free allowances together with limits on offsets to ensure more local emission reductions.
- **Refinery efficiency:** We support the proposal to establish refinery efficiency regulations and encourage the Board to consider the higher end efficiency target of the 20%-30% goals included in the alternatives.
- **Oil and Gas:** We support the implementation of CARB's recently adopted oil and gas regulation as a part of the overall plan to reduce methane, black carbon and other short lived pollutants.
- **Power Sector:** California is a leader in reducing the impacts of power generation emissions through renewable energy and energy efficiency efforts. Now, further work is underway in support of the Senate Bill 350 targets, including the target of 50% renewables by 2030. We support CARB's efforts to promote renewable energy strategies that reduce greenhouse gases through power sector GHG targets. We also encourage CARB to work with the Public Utilities Commission and Energy Commission to accelerate and exceed current renewable energy standards and begin work to establish a greenhouse gas reduction target for the power sector, and ensure ongoing progress, through its leadership role in coordinating and managing renewable energy integration efforts.

Accelerating Zero Emission Vehicle technologies: The Proposed Scoping Plan, the Mobile Source Strategy, State Implementation Plan, Mid-Term Review of vehicle standards and the Sustainable Freight Strategy all demonstrate to the need for widespread vehicle electrification if California is to meet its air quality and climate change goals.

- **Light Duty:** We support the proposal to target 4.2 million light-duty ZEVs on the road by 2030 as an interim step to achieving 100% ZEV sales no later than 2050. We encourage the Board to

¹ Cushing, et al. [A Preliminary Environmental Equity Assessment Of California's Cap-and-Trade Program](#). Sep. 2016.

² California Office of Health Hazard Assessment. [Benefits and Impacts of Greenhouse Gas Limits on Disadvantaged Communities](#). Feb. 2017.

work closely with the Public Utilities Commission, Energy Commission and other state and local partners to target investments and public education campaigns that support the regulatory requirements needed to guarantee vehicle volumes.

- In addition to vehicle and fuel technologies, we encourage CARB to develop a program for fuel-efficient replacement tires for passenger vehicles to improve fuel economy, reduce carbon and support local air quality improvements.
- **Medium and Heavy Duty:** We urge the Board to increase the proposed 100,000 minimum zero emission vehicle and equipment goal for heavy duty sector. We support the Board's efforts to establish a Phase 2 Standard for GHG emissions in the trucking sector, and to establish a strong zero emission transit bus standard to ensure full electrification in this sector.

Extend and Strengthen the Pace of the Low Carbon Fuel Standard: Given the need to accelerate emission reductions in the transportation sector and the actions in Oregon and Canada to embrace the low carbon fuel standard, we believe that California must continue to lead by establishing a new, higher target for carbon pollution reductions from transportation fuels as a key element of the 2030 Plan.

- We support extending and strengthening the LCFS to go beyond the pace of 10 percent reduction in carbon intensity over ten years and urge CARB to pursue the 25% target included in plan alternatives. The 2030 Plan should underscore the need to increase the stringency of the LCFS to achieve greater reductions sooner to protect our climate and public health through a cleaner fuel system.

Align Sustainable Community Goals with the 2030 Scoping Plan and Accelerate VMT Reduction

- We strongly support the implementation of SB 375 Sustainable Communities Strategies and believe that the Board should establish new and stronger targets aligned with California's 2030 climate goal. We support efforts outlined in the Mobile Source Strategy indicating the need to achieve a 7% VMT reduction by 2030 and 15% by 2050. These goals should guide the SB 375 target-setting process.
- Even with stronger targets, it is likely that additional VMT reduction measures will be needed to meet state climate goals. We urge the board to review best practices pioneered around the state and develop new recommendations and strategies to further VMT reduction efforts, including recommendations for better aligning state and local transportation expenditures with climate goals.
- We urge the board to work closely with local officials to identify funding needs along with further tools and strategies to achieve regional GHG reductions.

We look forward to working with the board and staff to ensure the greatest possible health improvements are incorporated into the 2030 Scoping Plan and subsequent rulemaking processes.

Sincerely,

Bonnie Holmes-Gen
Senior Policy Director, Air Quality and Climate Change

