April 10, 2017

**RE: Proposed Scoping Plan 2030**

Dear Chair Nichols and Staff:

Thank you for the opportunity to comment on the Scoping Plan Update, and for your continued leadership in addressing climate change. The plan provides a critically important opportunity to reduce the risk of catastrophic climate change - the greatest health threat of the 21st century - and to optimize the health co-benefits of climate action.

**Conduct a comprehensive health and health equity assessment.** The Board has previously received requests to integrate a comprehensive independent assessment of the health impacts of the strategies and scenarios outlined in the Scoping Plan, but the document provides only a cursory overview of potential health benefits that accompany reductions in toxic air pollution associated with greenhouse gas emission reductions.

We again urge you to fund a more comprehensive independent analysis of the health and health equity risks and potential benefits of each of the strategies and scenarios, as well as of the various options for implementation. The analysis should (a) include the expected direction, magnitude, and distributional aspects of the impacts and associated costs; (b) quantify health impacts and benefits to the extent feasible; (c) assess the full range of health impact pathways, including for example increases in physical activity associated with active transportation; and (d) consider whether additional GHG reduction strategies not incorporated in the current draft would add significant health benefits (eg reduced meat consumption.

A more robust consideration of health impacts and health opportunities is required by CEQA, AB 32, and AB197, and could ensure more emphasis on health and health equity as implementation options are considered. Health savings should also be integrated into the economic analysis; failure to do so artificially inflates the costs of climate mitigation. Relevant health and health equity metrics should be identified and tracked as the Plan is implemented.

**Place greater emphasis on reducing vehicle miles traveled**. Transportation contributes a higher proportion of GHG than any other sector, and active transportation provides the greatest opportunity for health co-benefits. Even modest shifts from vehicle travel to active transportation are associated with highly significant reductions in many chronic diseases. Yet the Plan inadequately integrates SB 375, and sets no targets for VMT reductions. We recommend that CARB incorporate ambitious and specific goals for VMT reduction, and include in the Plan itself specific strategies for meeting them. These targets and strategies should be included in the environmental analysis. VMT targets must also be aligned with state transportation investments, and with more stringent and enforceable GHG reduction targets in the SB 375 target-setting process.

**Assess and incorporate strategies to reduce carbon pollution associated with California’s own fossil fuels industry.** The Plan makes no recommendations for reducing the extraction, production, transport, or export of fossil fuels, although doing so could have significant long-term global health impact.

**Reduce reliance on cap and trade to fill emissions reduction gap.** Direct regulation offers the most straightforward path toward reducing greenhouse gas emissions and co-pollutant emissions from refineries and other large stationary sources, thus reducing the potential disproportionate and cumulative co-pollutant exposures in fence-line communities. Other strategies to further minimize community toxics exposures include reduction or elimination of the allocation of free allowances, and re-examination of the potential for further restriction of offsets - either geographic or sectoral. More ambitious goals for renewables and diesel emissions reductions are also technically achievable, and would reduce the greenhouse gas emissions gap that the Plan currently fills through cap and trade.

**Strengthen the link between climate change mitigation and adaptation, and prioritize actions that promote climate resilience while reducing greenhouse gas emissions.** Climate change impacts are already evident and more severe impacts are now inescapable. By prioritizing strategies that serve to both mitigate and adapt, health impacts of climate change can be reduced. Cool roofs, urban greening and green infrastructure, and weatherization that incorporate healthy homes upgrades for renters are but a few examples.

**Implement a funded, coordinated and coherent communications campaign that emphasizes the urgency of climate action and the health and economic benefits of climate action across all sectors**. While Californians are currently supportive of climate action, few understand the urgency with which we must decarbonize, the nature of the systems transformations required to do so, or the associated health benefits. And few are aware that relatively simple changes (e.g. modest increases in the use of active transportation and modest decreases in consumption of industrially produced meat) can bring significant health benefits and climate pollution reductions. A well-funded coordinated communications campaign could enhance support for significant climate action at all levels.

We look forward to working with you as you finalize and implement the updated Scoping Plan, and again appreciate your commitment to addressing climate change.



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