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Comments to California Air Resources Board on its [Draft 2022 Scoping Plan](#)  
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My name is Patrice Sutton, I am a public health professional, a collaborating research scientist at UC San Francisco, and Co-Chair of the Environmental Health Committee of S.F. Bay Physicians for Social Responsibility.

As you know, [the latest Intergovernmental Panel on Climate Change report warns us in stark terms that it is “now or never”](#). Without immediate and deep emissions reductions, it will be impossible to limit global warming. Your current scoping plan falls far short from this imperative. We implore CARB to fulfill its legal mandates by leaving the status quo that permeates your plan, and that has brought us to this brink, behind.

SF Bay PSR urges you to adopt a climate action plan that is commensurate with the problem at hand, that specifically and demonstrably prioritizes public health over a fossil fuel pathway to certain death, and that specifically advances health equity and environmental justice. The draft plan includes no public health equity analysis to systematically and transparently guide the evaluation, selection, and prioritization of strategies. Rather than calling for immediate action to reduce pollution, it relies on expensive and unproven technologies to meet its emission reduction targets.

To align CARB’s plan with its goals and legal imperatives CARB should:

1. Plan for **NO MORE OIL**. Keeping fossil fuels on life support is antithetical to our survival. Establish the target of near zero greenhouse gas emissions by **2035** (starting with at least a 3200 foot setback from homes, schools, hospitals and other sensitive receptors). Transition to clean, non-polluting zero-emission electric grid by 2035.
2. Plan for an **equitable pathway to building decarbonization retrofits** in addition to mandating building electrification in new construction. Phase out sales of new gas appliances by 2030 and ensure a full decommissioning of the gas distribution system by 2045.
3. Accelerate and scale up investments in **clean vehicles and mass transit**. Accelerate the path to 100% electric vehicles, alongside a massive expansion of infrastructure for clean public transit. Plan for 100% zero emission transit buses and drayage trucks by 2030 and 100% zero emission medium- and heavy-duty truck sales by 2035. Plan for 30% **reduction in vehicle mile traveled (VMT)** by 2035, and incorporate health cost savings from VMT reduction (increased physical activity) in your cost analysis.
4. Eliminate reliance on climate policy dead ends, such as expensive, risky, and unproven carbon capture, storage and utilization (CCUS) which introduce a new set of public health hazards. Prioritize strategies that lead to urgent direct emission reductions rather than relying on ‘carbon neutrality’ based on climate policy dead ends and unrealistic levels of direct air capture in 2045.
5. Plan for and implement a **just transition** for every worker, and community.
6. Build a **health equity evaluation process into the design of the Scoping Plan** to inform the selection and prioritization of strategies. Ensure that actual health outcomes are monitored and

evaluated throughout policy implementation. Address pollution and related health impacts of its strategies in already overburdened communities. As above, CARB shall prioritize strategies that reduce direct emissions and local criteria air pollutants and toxics.

You have the opportunity to support the health and survival of Californians, and well beyond, given the market signals your decisions will influence. Please take the leap and forge a plan that can truly serve as a pathway to survival, health, and justice for all.

Thank you.

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