

December 11, 2017

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

Re: Support for Scoping Plan Implementation

Dear Chair Nichols:

On behalf of the American Lung Association, I am writing to offer our support for the adoption of the 2030 Scoping Plan and to provide comments on key implementation steps we believe are necessary to improve public health. We offer the following recommendations to support the next steps for consideration as the Board meets to adopt and advance California's clean air and climate leadership.

Complete the Health Evaluation of the 2030 Scoping Plan and Measures

We urge the Board to establish clear processes and timelines to complete comprehensive public health and economic analysis for Scoping Plan measures. This work can help to raise the profile of the many co-benefits of climate policies, and protect against unanticipated consequences. We support CARB working to complete a more robust analysis in concert with the California Department of Public Health, the California Office of Environmental Health Hazard Assessment and other relevant state agencies. Specifically, we urge the Board to provide specific direction to staff moving beyond the adoption of the Plan and into implementation:

- **CARB should lay out a clear plan for developing elements of the public health analysis that could not be included in the current Scoping Plan, including both a broader evaluation of health outcomes and related economic impacts.** As noted in the proposed Scoping Plan, "CARB will convene a public meeting in Spring 2018 to solicit input on how best to incorporate health analyses into our policy development."¹ We believe that this is a positive step, but must be incorporated into a process with a clear timeline to complete a health analysis of the Scoping Plan and identify next steps for review of health impacts in each regulatory process.
- **CARB should work with state agency partners and the Legislature to ensure the key partners (e.g. Department of Public Health, Office of Environmental Health Hazard Assessment) has adequate resources to participate in the health analysis and the ongoing evaluation of measures needed to achieve the 2030 climate goal.**

¹ California Air Resources Board. 2030 Scoping Plan. p 50.

Maintain ambitious and achievable Sustainable Communities Targets

We urge the Board to direct staff to review and monitor availability of federal, state and regional funding resources, including existing and new funds that can support the most transformative land use and transportation projects and assist in SB 375 implementation. We supported - and called for increasing - the initial SB 375 regional greenhouse gas reduction targets proposed by staff in October 2017. We are disappointed that the targets presented in the October proposal will not be adopted during the December 2017 hearing, but look forward to working with the staff to ensure that the update of the targets is in line with the greenhouse gas and vehicle miles traveled reductions needed to achieve our clean air and climate goals. As noted in the Scoping Plan, the regional plans created to achieve the targets will not achieve the full 25 percent reduction needed in greenhouse gases from this effort and more work must be done across state agencies and in partnership with regional and local governments to advance healthy, equitable and sustainable communities.

Evaluation of a more stringent 2030 Low Carbon Fuel Standard Target

We urge the Board to direct staff to evaluate higher carbon intensity reduction targets within the rulemaking process for the 2030 Low Carbon Fuel Standard. As with the 2020 LCFS program, we anticipate significant health and climate benefits will follow stronger 2030 requirements. We support the proposals being considered in the 2030 LCFS rulemaking to increase zero emission, renewable fuel credits and believe that these efforts and greater investments in zero emission and other cleaner fuels will support reductions of over 20 percent in the 2030 timeframe.

The American Lung Association stands ready to partner with the Board and staff to ensure the greatest public health outcomes are achieved through the adoption and implementation of the 2030 Scoping Plan.

Sincerely,

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

