



July 8, 2016

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

Subject: Comments on Draft Scoping Plan Concept Paper

Dear Chairman Nichols,

On behalf of the American Lung Association in California and the Center for Climate Change and Health at the Public Health Institute, we are writing to provide our response to the 2030 Target Scoping Plan Concept Paper released on June 17, 2016. We view the upcoming Scoping Plan process as a critical next step in ensuring a healthy, sustainable future for all Californians.

Californians today face the most difficult air pollution challenges in the United States, and the health impacts fall disproportionately on our most vulnerable populations. The added health burdens of climate change impacts ranging from reduced air quality, threatened food and water resources, increased extreme heat and weather events, wildfires, disease burdens and others make the urgency of setting a strong course through the Scoping Plan that much more important. Our comments below provide our initial views on how the California Air Resources Board should move forward with drafting the 2030 Scoping Plan for public review later this year:

Public Health Assessment. We view improving and increasing public health to be at the heart of the Scoping Plan, and strongly support the inclusion of a public health analysis in the draft 2030 Scoping Plan. Similar to the detailed economic analyses undertaken by CARB over the course of implementing AB 32, we believe that a thorough analysis, designed and reviewed by health assessment experts with stakeholder engagement will ensure that the plan carefully considers the potential benefits or impacts of the draft plan and associated policy approaches. Toward that end, we are recommending the following elements be included in an updated health assessment:

- **Independent Assessment:** CARB should work closely with the California Department of Public Health to determine the most appropriate external institution or organization to conduct an independent and thorough evaluation of the impacts and benefits of the 2030 Scoping Plan and associated policies.
- **Adequate resources:** The Public Health Assessment should be adequately funded to ensure a comprehensive review of community health impacts and benefits can be conducted.
- **Community engagement:** The assessment process should utilize a variety of mechanisms to actively engage public health stakeholders, environmental justice and health community organizations, impacted communities, and other interested parties in the design and conduct of the public health assessment.
- **Comprehensive assessment:** The Public Health Assessment should be comprehensive, addressing a broad range of factors influencing health, including but not limited to criteria

air pollutants and air toxics, built environment impacts on chronic illness and other health outcomes, among others.

- **Evaluate Concept Paper outcomes** - We would also like to express our concern that health and health equity impacts must be considered in the selection by CARB of the conceptual framework, which will precede the development of the scoping plan itself. Without that early consideration of health, we are concerned opportunities for elevating health outcomes may be missed and unintended consequences may result.

Focus on active and zero emission transportation. While all existing programs will need to do more to reduce climate change health impacts and achieve the 2030 target, stronger actions taken in the transportation sector can drive down petroleum use, improve air quality and promote healthier, safer communities. The Scoping Plan should emphasize greater emission reductions in the transportation sector, including:

- **Sustainable Communities Strategy targets** should ramp up local efforts to build healthier communities and ensure that all communities can safely and equitably access ample zero emission and low carbon transportation options, whether walking, biking or transit. The initial targets set were achievable, but in many cases not as ambitious as needed given the urgency of climate change and chronic illness rates impacted by community design.
- **Zero Emission Vehicles and Low Carbon Fuels** – in order to reduce health damages caused by petroleum dependence in California and beyond, targets for zero emission technologies and fuels should be increased to promote the cleanest possible technologies and fuels as quickly as possible. Existing and planned carbon reduction targets for the Low Carbon Fuel Standard and technology targets for passenger vehicles, transit buses, goods movement and other mobile sources should be strengthened, both in terms of schedule and stringency.

Elevate state and local level coordination to fight climate change. A sustained, coordinated effort across all levels of government will be needed to comprehensively address climate change and prevent the most damaging local health impacts. This priority should be expressed clearly in the draft 2030 Scoping Plan:

- **State level coordination:** Stronger multi-agency coordination to achieve state climate targets and reduce dependence on polluting fossil fuels while improving health is essential. State transportation, air, energy, health and other agencies must work together to ensure state infrastructure plans and investments promote positive health outcomes.
- **Local level coordination:** In the 2015 Paris Climate talks, local actions to fight climate change were recognized as having a significant role in the global fight against climate change. The draft 2030 Scoping Plan should map out a larger role for California cities, counties and regions to achieve state climate targets for 2030 and beyond, including consideration the concept of local climate targets. While the Concept Paper notes the role and potential for exploring local climate actions, the draft Scoping Plan should clearly illustrate the role and resources - and potential targets - needed to achieve well-coordinated, local efforts to fight climate change. Air Quality Management Districts, Public Health Departments and other local and regional government agencies should be highlighted in the upcoming draft 2030 Scoping Plan as partners with the Air Resources Board and other state agencies in achieving climate goals.

We look forward to working with staff and the Board as the plan is drafted and the public process continues.

Sincerely,

Bonnie Holmes-Gen
Senior Director, Air Quality and Climate
Change
American Lung Association in California

Linda Rudolph, MD
Director
**Center for Climate Change and Health
Public Health Institute**