



California Air Resources Board  
Sacramento, CA

RE: Comments on Framework for incorporating health analysis into the climate change scoping plan (Health-7-13-18-ws)

We appreciate the framing that health is most driven by social determinants such as living conditions: physical, social, economic, and services. All climate change policies will have an impact on the social determinants of health and should be considered in the holistic and inter-sectoral framework. This is a great opportunity for improving the health and wellbeing of Californians, and we encourage CARB to take full advantage of this effort.

We applaud that the scope of the framework includes: An acknowledgement that all programs and policies in the Scoping Plan are drivers of health, pathways from these programs to changes in exposures to their health outcomes, regional and local health impacts, examination of both positive and negative impacts, include qualitative and quantitative, a broad range of upstream factors that impact health (social inequities, economic inequities, and living conditions). We agree that the vast majority of population health outcomes and health inequities in California are from chronic diseases, which can be mitigated by climate strategies that prioritize physical activity, healthy food, and healthy homes.

We would like to offer the following comments:

1. Climate change is a cross-cutting challenge and therefore requires coordination and collaboration across government agencies. In addition, health drivers are also cross-cutting and are not experienced as separate from each other (e.g., housing, land use, transportation). The holistic framework put forward by CDPH provides a starting point for CARB to ensure a comprehensive approach. We want to encourage CARB to make this an inter-sectoral and inter-agency approach to be inclusive of all drivers of health implicated in the program or policy under examination. We appreciate the collaboration among CARB, CDPH, and OEHHA, and encourage expanding the collaboration to bring in experts versed in diverse aspects of health as defined in the framework.
2. Through workshops and engagement, we encourage CARB to bring in stakeholders not only versed in the diverse aspects of social determinants of health policy but also program administrators and implementers as appropriate to provide context and on the ground experience for realizing benefits.
3. The matrix on Scoping Plan Programs and impacts on health is a good starting point to analyze the impact of these programs. We would be interested in seeing more analysis that supports this matrix, as that analysis should inform the plan and policy recommendations that can be implemented to improve the health co-benefits of the Scoping Plan.
4. We applaud the creation of a broad social determinants of health framework for the Scoping Plan programs. Potential outcomes from this effort that we think would be

beneficial are: a policy or practices to overcome funding and practice silos to support analysis and improvement of health impacts in the Scoping Plan Programs; metrics to support and demonstrate benefits and impacts; or implementation of Scoping Plan Programs that improve health and wellbeing, while slowing and preparing for climate change.

Respectfully,

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Build It Green