



June 21, 2022

Chair Liane Randolph
 California Air Resources Board
 1001 I Street
 Sacramento, CA 95814

Public Health Comments on Draft 2022 Scoping Plan

Dear Chair Randolph and Board members:

On behalf of the undersigned health and medical organizations, we are writing to comment on the Draft 2022 Scoping Plan Update. Climate change is a true health emergency - the greatest health threat of this century. Conversely, addressing the climate crisis is one of the most significant opportunities to improve public health and the final Scoping Plan must meet this opportunity head-on to improve health today while setting a path to a stable climate and opportunities for healthy generations to follow.

Like many advocates, health and medical organizations have weighed in throughout the public process to identify our concerns with the health analysis process, to speak to our preferred emission reduction strategies and to underscore the need for alignment of the Scoping Plan with near-term public health and health equity benefits as central to California’s climate strategy. We remain deeply concerned with elements of the draft plan being built on Scenario 3, which is focused on the longest time horizon under consideration and offers fewer overall health benefits than rejected scenarios. Our comments follow our

previous recommendations,¹ and address the opening lines of the Draft Scoping Plan as we seek to continue to provide constructive and actionable feedback on the draft plan:

This said, as the CARB Board and other stakeholders carefully consider the Draft 2022 Scoping Plan, they might find there is value in importing aspects of other alternative scenarios in order to improve upon the staff-proposed alternative.²

We offer the following recommendations to improve the health benefits of the Scoping Plan:

Overall Comment

The Draft 2022 Scoping Plan fails to illustrate pathways to maximize the near-term health and equity benefits of climate policies and certain strategies included in the draft may have the opposite outcomes. The focus of the Scoping Plan should prioritize near-term emission reductions that meet and exceed California's 2030 climate standards while also offering near-term benefits to impacted communities across a variety of health outcomes.

Incomplete and Limited Role of Health Analysis of the Scoping Plan

Since 2009, the California health community has advocated for the integration of a comprehensive health analysis into the design of the Scoping Plan so that CARB could optimize the health benefits of a suite of actions to reduce greenhouse gas emissions. We have recently weighed in with letters, testimony and comments during the CARB workshop processes and it remains deeply concerning that the analysis appears disconnected from design of the draft plan. Instead, the health analysis comes after the design of scenarios – rather than assessing which actions are likely to have the most significant health and health equity benefits and intentionally integrating them into scenario planning. Because the illustration of health outcomes in 2045 does not provide adequate information on the design of the Scoping Plan or associated measures, we call on CARB to better examine what scenarios and strategies would maximize health benefits and differentiate potential health impacts and benefits associated with meeting statutory 2030 standards versus the 2045 goal. We continue to believe that the approach taken does not provide guidance to reaching the most health protective strategies to inform the draft plan.

While we appreciate that the outputs of the analysis have been expanded to include more air quality-related health impacts and qualitative information, there are still gaps in the understanding of which policies could be combined to maximize health benefits, reduce health impacts and address ongoing disparities in community health impacts.

As noted in previous comments, the health analysis is both limited in scope and incomplete. For example, both CARB and the California Department of Public Health have supported development of and been trained in the use of Cal-iTHIM (Integrated Transportation and Health Impacts Model) to model the health impacts and monetized health costs associated with increased physical activity from active transport and reduced vehicle miles traveled. These analyses have repeatedly shown that even

¹ Health coalition comments on Scoping Plan. October 2021, January 2022, March 2022. https://www.lung.org/getmedia/7d2dc040-5348-4634-b049-4b27ba6ccd42/Health_Comments_Scoping-Plan-workshop-10-22-21.pdf; <https://www.lung.org/getmedia/d612297b-5d8f-4436-8d10-dbf5e2df0d9c/Health-Evaluation-Comments-from-Health-Groups.pdf>; [https://www.lung.org/getmedia/8811048a-5dad-40bb-be36-427c047cb559/Health-Group-Comments-on-the-Scoping-Plan-%e2%80%93-Health-Analysis-\(2\).pdf](https://www.lung.org/getmedia/8811048a-5dad-40bb-be36-427c047cb559/Health-Group-Comments-on-the-Scoping-Plan-%e2%80%93-Health-Analysis-(2).pdf)

² California Air Resources Board. Draft 2022 Scoping Plan Update at p. iv. <https://ww2.arb.ca.gov/sites/default/files/2022-05/2022-draft-sp.pdf>

modest increases in active transportation yield health benefits and averted health costs that far eclipse the total costs of implementation of Scenario 3 in 2045. Failure to integrate VMT health benefits into the analysis significantly skews the cost analyses by failing to include the very significant averted health costs associated with VMT reduction. We strongly urge CARB to move to a more comprehensive health analysis process to inform planning processes of such importance.

Certainty in Emission Reductions: Focus on Direct Emissions Reductions over Emissions Trading, Carbon Capture programs that extend Fossil Fuel Dependence

The Draft Scoping Plan relies heavily on carbon capture technologies, and the role of the Cap-and-Trade program in the plan remains undefined. Given the uncertainties and capacity for each to extend local pollution impacts, we restate our view that CARB should pursue more rapid and ambitious direct emissions reductions that would (as the health analysis suggests) have significant health benefits particularly in the low-income communities and communities of color who are disproportionately burdened by the health impacts of transportation, industrial, agricultural, and fossil fuel extraction emissions.

We recognize that there are many forms of carbon capture and sequestration and believe that natural and working lands should be the priority alongside strategies that reduce dependence on fossil fuels and associated pollution impacts. Any carbon capture technologies must be accompanied by clear guidelines and guardrails to protect against ongoing local health impacts, project failure and other elements.³ Given the climate and health imperative to rapidly reduce fossil dependence, the use of carbon capture technologies that extend dependence on fossil fuels should be excluded from the final Scoping Plan.

Vehicle Technologies and Fleet Turnover: Alignment with 2020 Mobile Source Strategy

The CARB 2020 Mobile Source Strategy (MSS) was completed in 2021 and was intended to inform the development of the Scoping Plan. While there are areas of alignment, the Draft 2022 Scoping Plan Update does not reference the 2020 MSS at all, and many elements of the Scoping Plan draft do not track with important assumptions made in the MSS. For example, the 2020 MSS assumptions included more ambitious timeframes for zero-emission sales and legacy fleet retirements:

- 100% ZEV sales starting 2035 for Medium-Duty vehicles
- 100% of model year 2035 and newer Heavy-Duty vehicles registered in California will be ZEV
- Accelerated turnover of older trucks⁴

We appreciate that CARB has rulemakings underway related to zero-emission trucks and passenger cars and are actively participating in those efforts. We believe that the earlier years of the programs are critical to accelerating zero-emission transportation health benefits, and those regulations can be improved to yield greater results, including by matching the trajectories noted in the MSS. We are concerned, however that CARB has not yet indicated a pathway to retirement requirements for heavy-

³ CARB Draft 2022 Scoping Plan Update at p. 70 indicates that significant stakeholder processes must follow any inclusion of carbon capture as a strategy given the health, air quality and equity concerns raised by environmental justice advisors, the Council on Environmental Quality and academic researchers. While the academic [report](#) cited in the draft Scoping Plan notes that application of carbon capture “could reduce emissions of criteria air pollutant emissions from certain facilities”, [page 67] the paper also notes that “the local community benefits and impacts will vary by project and location”, [page 107] and that it “is possible that the installation of a CCS plant could lead to an increase in air pollutants other than CO2...” and “may have to undergo significant revisions” to its air pollution permit to accommodate increased emissions. [A-5]

⁴ CARB, 2020 Mobile Source Strategy at p. 68. October 28, 2021. https://ww2.arb.ca.gov/sites/default/files/2021-12/2020_Mobile_Source_Strategy.pdf

duty trucks reaching their useful life as defined by Senate Bill 1 (Beall, 2017) and called for repeatedly by health organizations.⁵ The draft State Implementation Plan (SIP) and elements of the Advanced Clean Fleets (ACF) program indicate interest in retirement in limited circumstances, but a robust retirement program for heavy-duty trucks reaching useful life per SB 1 is a critical clean air and climate reduction opportunity that cannot be missed.

Sustainable Communities: Alignment of Transportation Funding with Emission Reductions

The Scoping Plan is more ambitious on VMT reduction projections than were included in the MSS but achieving even existing sustainable communities strategies remains out of reach. Continuing to increase the targets for curbing pollution from land use and transportation decisions without meaningful accountability has not yielded intended results to date. The Scoping Plan Draft provides detailed information on elements needed to move toward more sustainable communities, but these pathways face obstacles and are also yet to yield results.

As noted in the Sustainable Communities Appendix: the “most critical step of this realignment will be reimagining roadway projects that increase VMT ...”⁶ Ensuring the alignment of transportation resources and funding with meeting pollution reduction, public health, equity and conservation targets must be a central state agency action in the final Scoping Plan.⁷ CARB must clearly illustrate accountability for actions that state agencies can take to support sustainable communities and protect against ongoing investment in projects that work at cross-purposes to our clean air, sustainability and equity.

Energy Assumptions: Investing in Non-Combustion versus New Generations of Fossil Fuels

The assumed investment in new fossil-fueled energy infrastructure is at odds with climate and health protection and should not be part of the Scoping Plan. We are concerned that the assumptions of ongoing fossil fuel infrastructure and the buildout of new facilities will result in ongoing reliance on – and combustion of – fossil fuels and bring associated health consequences well beyond even the long-term intended phase-down of harmful fuels envisioned in the Draft Plan. CARB must not incorporate new fossil fuel infrastructure that interferes with deployment of non-combustion resources and that will likely lock in additional fossil fuel use well beyond the life of the plan. Further, it does not appear that CARB’s draft SIP measure calling for 100 percent zero-emission space and water heater sales (for both new and existing buildings) in California by 2030 is fully incorporated in the infrastructure analysis.⁸

In summary, we urge CARB to adopt a more ambitious plan that better optimizes health and health equity, minimizes risks to already disproportionately burdened communities, and protects the health of

⁵ Health community comments in re: useful life retirement programs. September 30, 2021.

<https://www.lung.org/getmedia/f0ac43ec-41bf-4eaa-8caf-a2250c4aaf37/Health-Group-comment-on-MSS-9-30-21.pdf>

⁶ CARB Draft 2022 Scoping Plan. Sustainable and Equitable Communities, Appendix E, p. 12.

https://ww2.arb.ca.gov/sites/default/files/2022-05/2022-draft-sp-appendix-e-sustainable-and-equitable-communities_0.pdf

⁷ Specific, trackable measures to ensure progress on alignment of transportation funding with climate, health, equity goals and targets were included in the California State Transportation Agency’s Climate Action Plan for Transportation Infrastructure (CAPTI). The intent of this framework is to align state funds with various goals, including the Scoping Plan, through investment in Active Transportation, Transit, reducing vehicle miles traveled and improving health in overly burdened communities. See Guiding Principles, pp. 16-17 and Appendix A, pp. 35-45. July 2021. <https://calsta.ca.gov/-/media/calsta-media/documents/capti-july-2021-a11y.pdf>

⁸ CARB. Draft State Implementation Plan measures, pp. 86-88. Jan. 2021. https://ww2.arb.ca.gov/sites/default/files/2022-01/Draft_2022_State_SIP_Strategy.pdf

California's future generations to the greatest extent possible. We look forward to working with the Board and staff throughout the process and thank you for considering our comments.

Sincerely,

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