



June 23 , 2022

Chair Liane M. Randolph  
California Air Resources Board  
1001 “I” Street  
Sacramento, CA 95814

To Chair Randolph and California Air Resources Board Members,

We are health organizations, health professionals and students from across the United States, urging the California Air Resource Board (CARB) to adopt an ambitious and just climate action plan in line with the urgency of the climate crisis, centered in and driven by health and equity.

The California Air Resource Board (CARB) [Draft 2022 Climate Change Scoping Plan](#) is a blueprint that will guide the next 20 years of climate policy in California and could potentially be used as a blueprint for other states and federal climate policy. Our response to climate change provides a huge opportunity to improve health and redress health inequities, since many climate solutions have immediate and significant health benefits. California, where [historical discriminatory housing policies](#) have trapped communities of color, particularly Black, Brown, Indigenous, Asian, Pacific Islander, and low-income communities in [overpolluted neighborhoods](#), where [more than 7 million people live within a mile of an an operational oil and gas well](#), must lead the way with solutions to the climate crisis that are centered in and driven by health and equity.

We urge you to:

1. Plan for a full, coordinated **phase out of fossil fuels**, with targets for oil refining by 2045 and oil and gas extraction by 2035 (starting within 3200 foot setback from homes, schools, hospitals and other sensitive receptors).
2. Transition to **clean, non-polluting zero-emission electric grid** by 2035.
3. Develop 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.
4. Accelerate and scale up investments in **clean vehicles and mass 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.
5. **Eliminate reliance on climate policy dead ends**, such as expensive, risky and unproven carbon capture, storage and utilization (CCUS) and Carbon Capture and Storage (CCS) which introduce a new set of public health hazards.

6. Prioritize strategies that lead to **urgent direct emission reductions** rather than relying on ‘carbon neutrality’ based on climate policy deadends and **unrealistic levels of direct air capture** in 2045.
7. Implement a **just transition** for every worker, and community, to ensure a healthy and sustainable future for all.

Unfortunately, the CARB 2022 Climate Change Scoping Plan (Draft Scoping Plan), despite legal mandate, has not incorporated a **public health equity analysis** in the process of evaluation, selection, and prioritization of strategies and policies to address climate change and requires little to no immediate action to reduce pollution, and even worse, relies on expensive and unproven technologies to meet its emission reduction targets. This is disastrous for climate and public health and leaves working class Californians and frontline communities behind.

Health professionals across the globe recognize that [climate change is a public health crisis](#) which impacts the health of people now and to a greater degree in the future. The science is clear, [we have a terrifying short time frame](#) to stop burning fossil fuels and must not invest in building new fossil fuel infrastructure. A [path to a green economy](#) exists, and it's more affordable now than ever. Existing and currently planned fossil fuel projects are [already more than the climate can handle](#). We are deeply concerned that **the Draft Scoping Plan calls for increasing gas-fired power generation** by 10 gigawatts (equivalent to 30 new, mid-sized gas-fired power plants) and instead of fast tracking strategies that result in direct emission reduction, it heavily relies on unproven technologies such as Carbon Capture, Storage (CCS) and Direct Air Capture with unrealistic expectations and [prohibitive social cost](#).

CARB should ensure the portfolio used to power decarbonized buildings is **non-polluting and renewable**. In addition to mandating building electrification in new constructions, CARB needs to develop an **equitable pathway for building decarbonization** retrofits to existing residential and commercial buildings with the goal to decarbonize all existing buildings by 2045. CARB must consider the **air quality and public health impacts of electricity generation** in assessing each policy’s social equity costs and must preclude use of [blue or gray hydrogen](#) to power the electricity grid and instead incentivize investment in community-controlled and community-owned microgrids, powered by **community solar with battery storage**. “Natural gas” (aka methane) is a [potent greenhouse gas](#) (GHG) and [escapes into the atmosphere across its entire supply chain](#), from the extraction, processing, and distribution systems and from [inactive and abandoned wells](#). CARB should plan to fully decommission the gas distribution system by 2045 to meet its climate goals. CARB must eliminate another climate policy dead end, hydrogen blending. Truly low-carbon hydrogen (“green” hydrogen) is not available on a commercial scale and should be reserved for use in hard-to-electrify industrial sectors. [“Blue” hydrogen](#) (derived from methane in addition to using CCS ) is not in fact climate friendly. Blending hydrogen with methane will not significantly reduce GHGs at levels of blending that are feasible with today’s infrastructure and does little-to-nothing to avert indoor air pollution from gas stoves. A blend of a fossil fuel still results in the use of the fossil fuel and investing in new fossil fuel infrastructure and continued use of fossil fuel as an energy source has no place in a climate resilient home.

CARB’s staff and contractors do not fully account for the **avoided costs of climate and health damages** in their cost assessment for mitigation strategies and there is no analysis of the cost of delay in climate action. A new report from Consumer Watchdog estimates the economic cost of greenhouse gasses resulting mainly from the combustion of fossil fuels and of the effects of their toxic emissions on public

health in California is more than [\\$400 billion](#) a year. Fossil fuel companies, capitalizing off current international conflicts, are [raising fuel prices](#) and [making record profits](#). Yet CARB has no target date or plan for phaseout of oil refining and paves the way for billions of dollars in **public subsidies for risky and ineffective carbon capture and storage** (CCS). CCS, in fact, extends the life of oil refineries and creates [public health hazards at every step of the way](#)— capture, transport and storage. CARB has not performed life cycle analysis of CCS, which in fact, as currently practiced, [is a net CO2 producer](#). At the CO2 capture site, CCS increases the levels of other deadly pollutants associated with poor birth outcomes, asthma, heart attack, and stroke in frontline communities, exacerbating stark health inequities in California. The liquid CO2 pipeline network required by CCS would [extend severe health threats to additional communities](#). The transported CO2 is proposed to be injected in underground vaults or chambers which have to remain leak-proof for hundreds of years; despite the fact that the injection process potentially could [increase the occurrence of earthquakes](#) (as it is observed with injection of fracking wastewater in underground disposal wells).

CARB Draft 2022 Climate Change Scoping Plan represents an alarming adherence to the status quo that in effect extends the life of fossil fuel extraction and perpetuates environmental racism. It is inconsistent with IPCC recommendations and the goals of AB 32 and AB 197, and does not protect public health.

Climate change is a public health emergency that demands bold and immediate action. That is why we, as health professionals and students across the country, are calling on CARB to adopt a climate action plan that meets the scale of the climate crisis, promotes public health, and advances health equity and environmental justice.

Sincerely,

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