February 15, 2022

To Whom It May Concern,

My name is Manijeh Berenji, a board-certified occupational and environmental medicine physician practicing and residing in Long Beach. I am also Health Sciences Clinical Assistant Professor of Medicine and Public Health at UC Irvine.

Being in Long Beach, which represents one of the states’ most polluted communities, I will continue to advocate for the strongest and most effective climate policy. I know that the most effective emissions reductions policy is the one that protects our collective health and wellbeing while addressing the climate crisis with the urgency and scale it demands.

Californians need a robust climate Scoping Plan that protects our health and brings us closer to an economy that works for all.

My 3 main comments:

1. There needs to be a comprehensive health analysis framework embedded within the Scoping Plan Update to actively monitor what’s happening in real-time so can methodically evaluate and advance our climate, health and environment justice goals. Without such a framework, CARB cannot assess any potential health risks - especially to already impacted communities - of strategies deployed to reduce climate pollution. CARB also cannot identify which solutions have the greatest power to simultaneously reduce greenhouse gas emissions and improve health, reduce health inequities, and advance environmental justice.
2. The Scoping Plan Update needs a fine-tuned health equity analysis which includes:
	* Designing all climate policies to achieve the greatest health benefits possible and evaluating which set of measures would provide the greatest health and health equity benefits.
	* Integrating processes for evaluation and incorporation of health and health equity impacts and benefits of various climate policy options into the fabric of scoping plan & rulemaking activities from the start.
	* Considering health outcomes of proposed measures individually and assessing interactions and combinations of various policies.
	* Incorporating considerations of socioeconomic, race, ethnicity, gender and other indicators of health inequities.
	* Incorporating geographic analyses that assess differential impacts on different communities
	* Including qualitative metrics when necessary.
	* Include the economic costs of health impacts or benefits.
	* Establishing a Health Advisory Committee including stakeholders with public health and academic health research expertise. The committee should inform the scope and conduct of comprehensive health analyses and CARB should engage outside experts and provide opportunity for external peer review.
3. Carbon capture & storage (CCS) technology is a climate solution that simply doesn't work. It will only make harmful emissions worse, straining our communities’ health and delaying our progress toward meaningful climate solutions.
* CCS would continue to unjustly harm the health of low-income communities and communities of color, where existing oil infrastructure is currently placed.
* The existing fossil fuel infrastructure that would host future CCS technology is disproportionately placed in low-income neighborhoods and communities of color, increasing their risk of exposure to harmful chemicals and pollution from natural gas turbine-powered CCS equipment. Increased emissions of hazardous air pollutants coming from power plants including Nitrous Oxide, Particulates (PM2.5), Ozone, which lead to decreased lung function, asthma onset, asthma exacerbation, increased response to allergens, cardiovascular disease, bronchitis, cognitive decline, dementia, preterm birth, birth defects and more.
* There is a chance that the sequestered CO2 could rupture and be released into the atmosphere putting vulnerable communities at great health risk and risking a climate disaster.
* During the CCS process, CO2 is pressurized and turned into liquid for transport. These pipelines are placed near fossil fuel industrial sites. The pressurized pipelines used to transport CO2 during the CCS process may leak or rupture, causing a dangerous accident that asphyxiates nearby residents. Recent studies show that CO2 could permanently contaminate underground aquifers, poisoning precious drinking water for millions of people. In the event of a technological failure or earthquake, CO2 would immediately be released back to the atmosphere.

We can imagine a different California - a state where all residents can breathe easily, where our communities don’t suffer from excess rates of cancer, neurological or auto-immune disease. In 2022, it’s time to systematically plan for environmental health and climate safety. It’s time for a new and improved Scoping Plan that will benefit working class communities, people of color, the elderly and the young.

Thank you.

Sincerely,

Manijeh Berenji MD MPH FACOEM