



January 22, 2014

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

Subject: 2014 Recommendations to Maximize Public Health Benefits of SB 375

On behalf of the undersigned public health and medical organizations, we write to provide our recommendations for maximizing the health benefits of California’s landmark Sustainable Communities and Climate Protection Act, SB 375. Achieving the health benefits of SB 375 is a top priority for our organizations in 2014, and we encourage the California Air Resources Board to consider additional strategies to ensure we move toward healthier communities for all Californians.

California’s public health community is dedicated to the success of SB 375 because this landmark law gets to the heart of so many of the health challenges Californians face today, challenges that have the greatest impacts on our most vulnerable and disadvantaged residents and communities. Changing the way that our communities and transportation systems are designed and built can dramatically improve air quality and reduce our chronic disease burdens. Efforts to reduce vehicle dependency will help curtail preventable air pollution-related cardiac

and respiratory diseases, cancers and other health emergencies that end in ER visits, hospitalizations and even death. Evidence also shows that communities where residents can take part in daily physical activity and active transportation can result in significant reductions in cancers, diabetes, heart disease, obesity and stroke, as well as billions of dollars in associated health costs.

Sustainable planning should also include a focus on developing local sustainable food systems, urban greening and green infrastructure to not only mitigate air pollution and greenhouse gases but to help local communities adapt to climate change.

As CARB meets this month to discuss the implementation of SB 375, our organizations offer the following recommendations to consider in the coming year in order to maximize the public health benefits associated with more sustainable community planning.

We urge CARB to review progress and consider updating the targets in 2014 for the second round of SB 375 planning. The first round of SB 375 Sustainable Community Strategies (SCS) have met or exceeded regional targets established in 2010, indicating that more ambitious targets would remain achievable. The first round SCS plans generated a tremendous amount of learning and set the stage for future plans that contribute even more significantly to critical climate change goals. This update should address lessons learned, challenges to success, modeling improvements, treatment of interregional travel and other key technical items. To support this review, CARB may wish to reconvene the Regional Targets Advisory Committee to update its original technical guidance and evaluate any regional targets that should be strengthened. For example, while the 2013 SCS adopted by the Santa Barbara COG projects a 15.4 per capita emission reduction, the 2010 target established by CARB was a zero percent change in emissions, indicating that initial targets were overly conservative and ripe for review. We look forward to the release of the next iteration of the AB 32 Scoping Plan Update draft for further discussion of how SB 375 can help meet California's longer-term climate policy goals.

CARB must address the modeling and methodology questions related to several San Joaquin Valley business-as-usual scenarios that far exceed regional targets. At least three San Joaquin Valley COGs could significantly exceed their 10 percent per capita targets for 2035 – even under baseline scenarios (*e.g.*, San Joaquin COG's base case achieves a 22.6 percent per capita reduction while Kern COG's base case achieves a 14.3 percent reduction in 2035). Given the vast over-performance of baseline scenarios in a region with some of the most significant air quality and chronic disease burdens in California, CARB should evaluate the greenhouse gas calculation modeling and assumptions, ensure their accuracy, explain any unexpected results, and develop guidance for COGs to clearly illustrate emission reductions directly attributable to ambitious local actions.

All MPOs should be encouraged and supported in utilizing health evaluation tools such as those under development by the Strategic Growth Council. In December 2013, the Strategic Growth Council voted to direct funding to evaluate and develop the public health capabilities of the *Urban Footprint* planning tool. This vote was supported by over 25 public health and medical organizations because elected officials and the public need to better understand the health benefits and impacts of planning decisions, including impacts on respiratory health, physical activity-related chronic illness, and bicycle and pedestrian safety. We encourage CARB to assist in the development of this important tool so that all regional planning agencies, and eventually local governments, health departments and other stakeholders, can quantify health effects of planning decisions before they are final.

We encourage CARB to work closely with state agencies to ensure funding is available to support and build more sustainable communities throughout California. As initial SCS plans have been adopted, and the San Joaquin Valley COGs move forward with initial plans this year, it is important that local agencies have support in implementing these plans and achieving the benefits of healthier community planning as quickly as possible. This funding could enable local agencies to update their land use and transportation policies and ordinances. This can better foster sustainable transportation, food systems, urban greening and green infrastructure to assist with climate change adaptation and help California communities become more healthy, equitable, and sustainable.

We look forward to working with CARB, as well as the Strategic Growth Council, to support investments in sustainable community efforts throughout California, including through the allocation of Cap and Trade auction proceeds as outlined in the Governor's draft 2014 budget and CARB's May 2013 AB 32 Cap and Trade Auction Proceeds Investment Plan.

Thank you for considering our health perspectives on SB 375 in 2014. We look forward to working with you in the coming year to help further the goals of SB 375 and create healthier, more equitable and sustainable communities for all Californians.

Sincerely,

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