Health Professional Comments on September 30 Workshop

on SB 32 Scoping Plan Scenario Input

Thank you for the opportunity to comment on the SB 32 update scenarios. While there are multiple pathways to net zero, as health professionals we believe solutions which have the greatest power to improve health and increase environmental justice should be given priority. Health impact analyses repeatedly show that the value of health benefits from choosing healthy and just solutions almost always exceeds their cost. It disturbs us to see that so many of those just and healthy solutions appear only in Alternative 1, a scenario which also contains extremely impractical elements like closing down all cement plants and restricting 100% of light duty vehicle sales to ZEVs in 3 years. Alternative 1 also allows continued emission of methane from landfills, the largest source of methane emissions in California. Alternative 4 is equally disturbing as it reneges on multiple existing state targets.

In the face of a climate emergency every scenario should be about achieving the maximum possible speed and magnitude of emissions reduction. Differences between alternatives should be about strategy, not plausibility or urgency. No actions should be delayed without a good reason, and none should move us backward. Where there is a choice, we should choose the option which benefits those who experience environmental injustice and disproportionate climate impacts and provides the biggest health benefits. But if we take Alternative 1 off the table, the remaining alternatives are unhealthy and unjust.

Biogas, biofuels, combustion with CCS, and ongoing oil and gas extraction all leave low income communities of color with continued exposure to air pollution. Electrification without retrofits leaves a shrinking pool of low income customers shouldering the cost of an aging gas distribution system. Failure to maximize VMT reduction forgoes multiple health benefits: decreased air pollution and motor vehicle accidents, increased physical activity and expanded transportation options for non car owners.

We believe CARB should go back to the drawing board and create a viable high road alternative which takes the best from Scenarios 1 and 2. This Alternative 1.5 would include:

METHANE

Increased landfill gas capture.

No expansion of dairy biodigesters.

LFG and biogas delivered exclusively to hard-to-electrify industries.

Large expansion of alternative manure management.

Deployment of enteric fermentation suppression in the largest dairies by 2030, with dairies footing the bill.

Divert 75% of organics from landfill by 2025 (=SB 1383).

INDUSTRY

Achieve greater than 6% increase in efficiency.

Decrease production in hard to electrify industries by recycling building materials.

Power hard -to-electrify industries with landfill gas and existing biogas.

Electrify other industries 50% by 2030 and 100% by 2035.

No investment in CCS. Mitigate with natural sequestration and support for decarbonizing other sectors.

BUILDINGS

All appliance sales electric by 2030. (The Kigali Amendment reduces HFCs 85% by 2036.)

Retrofit 50% of existing buildings to electric ready by 2035 and 100% by 2045, starting with multifamily and low income residential.

OIL and GAS

Phase out extraction by 2030.

ALTERNATIVE FUELS

No biofuels.

Only green hydrogen.

Limit aviation flights to whatever hydrogen and electric can provide (most air travel is for leisure trips and a small percentage of very wealthy people, and can be dispensed with).

VEHICLE ELECTRIFICATION

100% of light and heavy duty sales by 2035.

ELECTRICITY

100% clean by 2035, with hydrogen but without nuclear and CCS (no biomass or fossil fuel).

PORT OPERATIONS

100% electric shore power by 2030.

CARBON DIOXIDE REMOVAL

Natural and working lands only.

RNG

No increase in biogas production.

No injection of biogas into general gas pipelines.

Prune natural gas pipeline and retire when buildings reach 100% electrification.

Thanks for the opportunity to comment,

Sincerely,

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