July 9, 2021
Liane M. Randolph, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: 2022 Scoping Plan Update

Dear Members of the California Air Resources Board

The California Leadership Council of the Alliance of Nurses for Healthy Environments submits these comments with the intention of emphasizing the importance of examining every issue before you through a health lens. Climate change is the greatest public health issue before California, the US and the Global community.

We are pleased that the goals of the 2022 Scoping plan include not only measures to decrease greenhouse gas emissions and increase carbon sequestration but also to prioritize actions that result in multiple benefits to public health and the environment. It is essential that the 2022 Scoping Plan incorporate a comprehensive health analysis framework to provide an overview of the breadth of health impacts and health benefits that may accrue from the outcomes in the scoping plan. The upfront investment in health analysis will provide generous returns on the investment in the form of improving public health and reducing health care costs.

We believe that well-crafted climate policies can simultaneously reduce greenhouse gas emissions (GHGEs) and reduce the burden of chronic illnesses. Well-crafted policies will simultaneously reduce health inequities (driven by chronic disease and injuries) because the systems that cause chronic disease and drive stark and persistent health inequities are the same systems responsible for greenhouse gas emissions (GHGEs) largely the same: oil & gas extraction, transportation, and agriculture. The cost estimates do not include the cost to families of time lost from work, chronic illness related to the stress of caregiving and the loss of children being able to play outdoors in a clean temperate environment.

California has already broken heat wave records and the summer months have just begun. The Governor and the State Legislature are focused on heat resilience to develop programs to protect both urban and rural residents from extreme heat. When it’s hot, we tell people to drink water. Unfortunately, the drought has meant that many communities have not water and those that do need subsidies to pay their water bills. In the midst of this drought, fire prevention is a high priority.

The Equity and Environmental Justice workshop was refreshingly transparent. Low-income communities, communities of color and children experience the worst health outcomes due to pollution from tailpipe emissions, as well as from oil and gas production, pesticides & fumigants and direct climate change impacts. Climate change, who it endangers, who is exposed to pollution, whose health is harmed is an Environmental Justice Issue.
We would like to associate ourselves with the remarks of The Climate Center. We know that CARB is planning for scenarios where California could meet Climate targets by 2045 and believe that the state should try to meet these goals sooner. The science is there, and a more realistic target of 2030 should be considered.

CA ANHE is involved in advocacy related to climate change including: clean air and ZEVs, fire prevention and air pollution prevention, elimination oil and gas extraction (with “just transitions”) and until we can completely phase out OG extraction the implantation of safety setbacks for the frontline communities made up of predominantly people of color exposed to air and water pollution linked to serious chronic illness and death, immediate capping of abandoned wells to protect communities and to eliminate methane seepage, insisting steps to clean refinery emissions (entirely located in vulnerable communities of color), solar and wind energy, supporting a circular economy to decrease waste and landfill which brings with it off gassing of methane and other greenhouse gases (GHGs), eliminating the use of highly fluorinated chemicals in all sectors (PFAS family), supporting farming practices which promote carbon sequestration, and protect farmworkers, promoting environments in which to play and safe streets to walk and bike, and greening our hospitals and clinics to name just a few.

California has approximately 100 million acres of land, of which 27 million acres are cropland. California produces about 80% of all fruits and vegetables in the United States. Providing for the needs of the rest of the country has extracted a high cost to the quality and future of our soil and its ability to sequester carbon. Protecting this vast source of carbon sequestration, from 25% of our state’s land should be a priority.

CARB must consider working across departments to reduce pesticides. Pesticides not only pose harm to our soil but have serious adverse health consequences which disproportionately hurt communities of color: Latinx and farmworker communities. The links between pesticides, which are petrochemicals and cancer, chronic pulmonary disease, asthma in children that continues through the life span, Parkinson’s, autism, developmental harm, preterm labor and still birth and decreased sperm viability and infertility. Pesticide specifically fumigant exposures (300 times more potent than carbon dioxide and resulting in dramatic increases in nitrous oxide) pollute the air children try to play in and endanger their health.

The 2022 scoping plan should promote organic farming and soil resilience without using synthetic pesticides and fertilizers so carbon can be sequestered from our vast farmland, farmworkers can be protected, air pollution and nitrous oxide emissions decreased, and healthy food produced. It’s very important that decreasing pesticide use included in the Scoping Plan as a significant mitigation to GHGEs. The Department of Pesticide Reform is an important partner in these efforts along with other departments which CARB can coordinate the identification of alternatives to pesticides which are dangerous for public health, destroy soil and contribute to declining biodiversity.

The Scoping plan can also recommend that all state food procurement (school meals, senior meals, prison meals) increase the percentage of certified organic California grown produce over the next 5 years and beyond.

Thank you for taking on the work of crafting our very future. Every action will make a difference. Please consider these.

Sincerely,

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