



April 22, 2009

Mary D. Nichols, Chairman
 California Air Resources Board
 Headquarters Building
 1001 "I" Street
 Sacramento, CA 95812

Re: Support for a Strong Low Carbon Fuel Standard

Dear Chairman Nichols:

The undersigned medical and public health organizations of the Health Network for Clean Air are in strong support of the California Air Resources Board's (CARB) proposal to adopt the Low Carbon Fuel Standard (LCFS) to reduce the carbon content of transportation fuels by 10 percent by 2020 and urge the board to proceed without delay. At the same time we are requesting changes to strengthen the LCFS by requiring review and mitigation of air quality and health impacts and by requiring increased use of the cleanest fuels. This precedent-setting fuel standard will help the state kick its petroleum addiction and move to a cleaner, more sustainable transportation system.

As health and medical organizations, we are alarmed by the public health crisis caused by air pollution in California and consider the LCFS an important step toward improving air quality and reducing serious health threats in our communities. Californians are exposed to some of the nation's worst air quality and suffer serious health impacts, including lung cancer, asthma attacks, chronic obstructive pulmonary disease, heart attacks, strokes, increased hospitalizations from breathing problems, and premature death. According to CARB, air pollution causes nearly 20,000 premature deaths annually in California. A March 2009 study published in the *New England Journal of Medicine* found that people living in the smoggiest cities are 30 percent more likely to die from respiratory disease. As temperatures rise from global warming, California will face serious challenges to protect its air quality and the health of residents.

We believe it is particularly important that the regulation account for all greenhouse gas emissions throughout the entire fuel cycle, including conversion of land to produce biofuels, and therefore we support CARB's proposal to include consideration of indirect

land use in the standard. Without these provisions, the LCFS would not be effective in reducing greenhouse gas emissions and achieving the targets in AB 32.

The LCFS is a key component of California's overall strategy to combat global warming and will be the model for similar efforts at the state and federal levels. For these reasons, we must ensure that this regulation moves California toward a low carbon future as quickly as possible while addressing air quality and health concerns. Following are our specific recommendations for strengthening the standard:

1. Strengthening Air Quality And Public Health Review

- CARB should develop guidelines for local air district review of the health and air quality effects associated with the introduction of new fuels and infrastructure into California under the LCFS, and ensure that mitigation measures are adopted to address any adverse effects.
- CARB should commit to conducting a public health analysis of fuels and infrastructure used to comply with the LCFS as new assessment tools are developed and additional data become available.
- CARB should ensure that each fuel introduced is carefully reviewed as to whether it will help or hinder attainment of air quality standards on the state or local level, and adopt mitigation measures where necessary.

2. Promoting Ultra-Low Carbon Fuels

- CARB should either require that a percentage of fuels included in the LCFS be ultra-low carbon fuels, or provide sufficient incentives for increased development of these fuels over the course of the program. Encouraging the cleanest, ultra-low carbon fuels such as electricity and hydrogen from renewable sources will be key to California achieving both 2020 and 2050 greenhouse gas reduction targets.

The Health Network for Clean Air is counting on the Low Carbon Fuel Standard to take California a giant step forward toward reaching the state's global warming reduction targets. We support the California Air Resources Board's leadership in developing the LCFS and recognize this groundbreaking rule as a key tool in the fight against global warming pollution and over-dependence on polluting petroleum fuels.

We urge you to proceed with the adoption of a strong, effective Low Carbon Fuel Standard without delay, to help California achieve its ambitious greenhouse gas reduction goals while protecting public health.

Sincerely,

Bonnie Holmes, Senior Policy Director
American Lung Association of California

Eva K. Lean, President and CEO
American Cancer Society

Andy Katz, Government Relations Director
Breathe California

Martin Martinez, MPP, Policy Director
California Pan-Ethnic Health Network

Bonnie Castillo, Government Relations Director
California Nurses Association

David Claman, M.D., President
California Thoracic Society

Jeanne Rizzo, R.N., President and CEO
Breast Cancer Fund

Gerardo Gomez, MBA, Director
Long Beach Alliance for Children with Asthma

Kevin Hamilton, RRT, RCO, Co-Director
Medical Advocates for Healthy Air (Fresno)

Robert Gould, MD, President
Physicians for Social Responsibility, San Francisco Bay Area Chapter

Jeremy Cantor, MPH
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Robin Salsburg, Senior Staff Attorney
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Mary Pittman, Dr.P.H., President and CEO
Public Health Institute

Al Lerma, MPA, Director
Sonoma County Asthma Coalition

Anne Kelsey-Lamb, Director
RAMP (Regional Asthma Management and Prevention)

cc: Governor Arnold Schwarzenegger