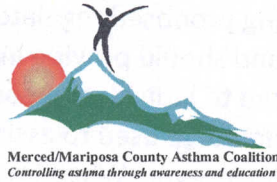


Medical Advocates For Healthy Air



November 19, 2008

Chairman Mary Nichols and Members,
California Air Resources Board
1001 I Street,
Sacramento, CA 95818

RE: Proposed Global Warming Scoping Plan

Dear Chair Nichols and Members of the California Air Resources Board:

As health and medical organizations, we are extremely concerned about the crisis of global warming and the reality that global warming will lead to serious public health problems and increase rates of illness, hospitalizations and premature death. Our health professionals are on the front lines dealing with the direct effects of global warming in daily interactions with the affected public and patients in hospitals and emergency rooms. We believe strong action is needed to reduce global warming emissions and protect California communities from multiple health threats.

With rising temperatures, individuals and communities will be dealing with a wide range of health threats ranging from air pollution, heat waves and weather extremes, water pollution, increased and more widely distributed vector populations, increased potential for food-borne illness and infectious disease and other health challenges. We are especially concerned about impacts to low-income communities and vulnerable individuals and communities including seniors, people with heart or lung disease, children and infants

We applaud the tremendous work of CARB staff in developing the proposed scoping plan to implement AB 32 and address these problems through measures to reduce greenhouse gases and co-pollutants including criteria pollutants and air toxics. In

addition, we recommend the following strengthening changes to boost public health benefits to individuals and communities throughout the state:

1) Establish a formal role for public health in AB 32 implementation

State and local public health agencies and organizations should have a formal and ongoing role in reviewing proposed regulatory and market strategies for greenhouse gas reduction and should provide input on the specific health benefits and concerns related to individual measures. New tools, such as “health impact analyses” should be used to assist in evaluation of individual measures at the state and local level. When implementation begins, public health support can facilitate the public and community support needed for the local and regional changes.

2) Strengthen land use element - Changing land use and transportation patterns at the local level to reduce driving is critical to achieving healthier communities and moving toward a carbon-free society. A stronger statewide goal for reducing vehicle emissions will help spur near term action at the local and regional level to promote more compact land uses, facilitate alternatives to driving and avoid sprawl. Promoting use of transportation alternatives such as walking, biking and public transit will lead to healthier lifestyles, less obesity and less chronic illness and injury.

- **CARB should establish a stronger statewide goal to reduce greenhouse gas emissions by 11-14 MMT from the land use and transportation sector.**
- **CARB should require air districts to adopt “indirect source” rules for greenhouse gas emissions to reduce emissions from development projects. CARB should also provide guidance to air districts in the development of these regulations.**
- **CARB should require staff to report back on additional effective tools and strategies available to reduce vehicle use.**

3) Protect vulnerable communities – It is critical that the state’s efforts to tackle global warming contain strong public health protections for vulnerable individuals such as infants and children, the elderly, individuals with existing heart and lung illnesses as well as low income communities that are often faced with limited access to health care, multiple sources of pollution, and higher rates of lung and heart disease.

- **Formalize CARB’s commitment to establish a cumulative impacts screening protocol within one year to identify vulnerable communities most impacted by air pollution.**

- Establish a process to identify and analyze any potential negative air quality or health impacts of proposed AB 32 regulations or measures in vulnerable communities.
- Direct CARB staff to design market-based compliance mechanisms to achieve maximum emission reductions and co-benefits in vulnerable communities.
- Direct CARB staff to initiate a public process within three months to recommend how resources generated through AB 32 implementation can be directed to assist in adaptation and emission reduction measures in the most vulnerable communities.

4) Strengthen GHG reduction measures on industrial facilities - Industrial facilities such as cement manufacturing plants and petroleum refineries can have major impacts on local communities in addition to being large statewide sources of greenhouse gas emissions.

- **CARB should ensure co-pollutant reductions and health benefits at the local community level by strengthening the industrial element of the plan to set a 10 MMT greenhouse gas reduction target for all large industrial sources.**

The CARB scoping plan currently estimates that the health benefits of greenhouse gas reduction measures will result in billions of dollars saved through reductions of premature deaths, illnesses, hospitalizations, asthma and respiratory symptoms, and reductions in lost workdays. We believe these health benefits could be increased significantly by strengthening the plan as discussed above and focusing on measures with large air quality co-benefits.

Reducing global warming is a vital strategy that will help Californians breathe easier and prevent suffering from lung and heart disease, as well as promote community and transportation design change that can reduce the risk of chronic disease and injury.

We look forward to working with you toward the adoption and implementation of a strong, health protective, greenhouse gas reduction plan.

Sincerely,

Bonnie Holmes
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American Lung Association of California

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