

July 31, 2008

RE: Comments on Climate Change Draft Scoping Plan

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

We commend the California Air Resources Board (CARB) for its groundbreaking efforts to develop a comprehensive plan to reduce greenhouse gas emissions. CARB is at the forefront of the world's efforts to address climate change, and we applaud its visionary and courageous leadership. We strongly support the need for a comprehensive plan to set goals and describe programs to reduce greenhouse gas emissions.

But the plan does not go far enough. Several key policy approaches that could have important co-benefits by reducing greenhouse gas emissions while improving public health have been overlooked or given little emphasis. Although the plan estimates the health benefits of reducing air pollutants, this only scratches the surface of the real opportunities to prevent chronic disease while mitigating climate change. We urge you to refine the plan to include the following:

- **Public health impacts must be fully evaluated.**
The draft plan limits its public health assessment to asthma and respiratory disease from air pollution. CARB must undertake a more robust and comprehensive analysis to account for *all* the potential public health *benefits and costs* related to the various mitigation strategies. As written, the scoping plan *significantly* underestimates the public health costs from failure to take action and the savings realized from an effective mitigation strategy. The public health community is eager to become a full partner in the analysis of the plan and the implementation of the adopted measures. We encourage CARB to reach out to the California Department of Public Health, local Health Officers, and other public health professionals to assist in these efforts.
- **Ensure protection for already over-impacted communities.**
Mitigation strategies, such as cap-and-trade programs or siting of new “green” facilities, must not exacerbate already existing health inequities in low-income communities. Such communities are already unequally burdened by extremely poor environmental conditions and poor health. This plan must include adequate safeguards for these communities.

- **Land use and transportation policies that reduce greenhouse gas emissions and improve public health must be included.**

Adding land use and public transit planning strategies to create walkable, bikeable, and transit-oriented communities is key to impact both greenhouse gas emissions and California's obesity and chronic illness rates. For example, almost one-third of Americans who commute via public transit meet their daily requirement for physical activity (30 or more minutes per day) by walking as part of their daily life, including to and from the transit stop. Requiring better land use and transportation planning will improve air quality and physical activity levels and reduce obesity-related illnesses such as diabetes and cardiovascular disease. By assigning only minimal emission reduction targets to land use and transit policies, CARB misses a critical opportunity to spur meaningful change in the built environment to mitigate climate change and improve the public's health.

- **Strong regional greenhouse gas reduction targets must be set.**

Establish regional greenhouse gas reduction targets to encourage cities and counties to pursue smarter land use planning that facilitates walking, biking, and transit use. While local governments should be authorized to choose from a suite of policy options to meet these targets, measures that improve community health should be prioritized. CARB must provide support—both financial and technical—to local governments to achieve these emission reduction targets. This would include developing model best practices for emission reduction programs and disbursing financial resources to fund these efforts. A meaningful portion of the funds generated from the cap and trade, carbon tax, Carbon Trust, or other revenue streams should be directed towards local programs.

Thank you for considering these suggestions.

Sincerely,



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Director
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