

California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

March 8, 2013

Re: Cap and Trade Auction Revenue: Achieving Legislative Public Health Mandates and Optimizing Health Co-benefits

Dear Chairperson Nichols and Board members:

The Public Health Alliance of Southern California is a collaboration of local health departments in Southern California, which together are statutorily responsible for the health of nearly 50% of California's population. Our vision is that all Southern California communities are healthy, vibrant and sustainable places to live, work and play. We appreciate the opportunity to provide recommendations for your consideration; the comments below are supported by the majority of our members.

In the interests of public health, we strongly support measures to reduce greenhouse gas (GHG) emissions. We are also deeply concerned about health inequities in our communities, which lead to significant differences in health outcomes and life expectancy in different neighborhoods. We believe that the implementation of the Cap and Trade revenue program provides an important opportunity to identify and support strategies that will simultaneously reduce GHG emissions and improve the health of California's most vulnerable residents. For example, physical activity contributes to the prevention of many chronic diseases, the treatment of which currently accounts for over 75% of all health care spending. An increase in active transportation (walking, biking, and using public transit) will yield very significant health benefits through incorporation of physical activity in the daily routines of more Californians. One recent study suggests that for a typical resident, an increase from 4.4 minutes to 22 minutes of active transportation each day in the San Francisco-Bay area (SF) would substantially reduce cardiovascular disease and diabetes by 14%, reduce dementia and depression by 6-7%, and reduce breast and colon cancers by 5% (Maizlish et al, Am J Public Health: e1-e7. doi:10.2105/AJPH.2012.300939). According to the model's projections, an increase in active transportation mode share in the SF area alone would deliver substantial savings in health care expenditures and increased productivity, conservatively estimated at \$1.4 billion per year.

We strongly urge you to prioritize funding of such win-win strategies, and provide more specific recommendations below to optimize the health benefits of Cap and Trade revenues.

Recommendations:

- **Improve Active Transportation Infrastructure:** Funding to increase non-automotive, active transportation is critical for reducing transport-related GHG emissions; it is also likely to be the single greatest health-promoting measure within the scope of the Cap and Trade Auction Revenue program.
 - Enhanced and expanded pedestrian and bicycle infrastructure
 - Enhanced, expanded and more affordable public transit
 - Connectivity between public transit and bike and pedestrian infrastructure
- **Increase Connectivity and Access to Healthy Lifestyle Opportunities:** Active transportation/transit is most viable when it allows access to high quality destinations. Transit, bike and pedestrian infrastructure investments should provide aesthetic, convenient and affordable access to opportunities for healthy lifestyles. Infill development supported with Cap and Trade Auction revenues should also prioritize the development of healthy lifestyle destinations, including:
 - Healthy foods (grocery stores, community gardens, farmers markets)
 - Parks, recreation facilities, green space
 - Clinics/ medical services
 - Employment centers and workforce development for low-income and disadvantaged communities and households
- **Enhance Safety:** As we expand bike and pedestrian infrastructure as well as public transit investments, it is important to incorporate strategies to protect public safety in projects and through policies. Research suggests that increased biking and walking can lead to increased injuries. Careful attention to incorporation of proven bike/pedestrian injury prevention strategies, many of which are already included in the State's complete streets policies, can help mitigate this risk. We suggest the incorporation of injury prevention strategies into all projects, especially in light of California's increasing elderly population, and for the protection of our children. Strategies include:
 - Complete streets implementation
 - Traffic calming
 - Signage and way finding
 - Safe Routes to Schools initiatives
 - Crime prevention through environmental design (CPTED)
 - Well-lighted crosswalks and sidewalks
 - Transit stations designed for universal ease of use and access
- **Promote Transit-oriented development (TOD) and affordable housing:** Efforts to increase active transportation, and to ensure that active transportation is accessible to all, will also

require investments to develop and rehabilitate public transit and affordable housing. Investments will require an increase in affordable housing in close proximity to transit and active transportation infrastructure, while protecting and improving the health of disadvantaged communities. We fully support the recommendations of the “Cap and Trade Auction Revenue Proposal: Funding for transportation choices and homes affordable to core transit riders” to utilize Cap and Trade revenue for support of these uses.

- **Include Heat Island Mitigation / Community Greening** The California heat wave of 2006 resulted in over 650 excess deaths. In addition to risks due to heat illness and heat stroke, heat waves can also exacerbate chronic disease such as cardiovascular or respiratory disease. It is important that infill and transit-oriented developments are built with heat island mitigation in mind, through use of measures such as cool pavements, cool roofs, and, we believe most importantly, community greening. The resulting communities will both be more livable, and lower-carbon as urban green space absorbs CO₂ (and other pollutants), cools neighborhoods, reduces the heating and cooling needs of buildings, and can change behavior to further reduce GHG emissions. We strongly recommend the inclusion of funding for:
 - Tree canopies
 - Pocket parks
 - Community and school gardens/ urban agriculture
 - Green roofs / cool roofs / cool pavements
 - Covered transit stops
 - Building siting and orientation
 - Sustainable agriculture

- **Promote Air Quality Improvements / Mitigation** Air quality, both outdoors and indoors, affects human health and related respiratory disease outcomes. We support investments that decrease harmful air pollution exposures and ensure that disadvantaged communities don't experience a disproportionate burden of GHG and co-pollutants. Examples of these strategies include:
 - Achieve state and federal clean air standards
 - Expand clean passenger vehicles, car-share, carpools and vanpools with incentives for disadvantaged, low-income communities and households
 - Promote clean transit and freight transport
 - Provide weatherization/energy efficiency/green building materials in new construction with incentives for affordable housing

We recommend that all projects and programs applying for funding should be evaluated using criteria that demonstrate how the project or program will:

- Maximize public health
- Mitigate public health risks
- Support the health of disadvantaged communities and vulnerable populations

Public Health Alliance

of Southern California

Suggested Next Steps:

- Incorporate the above recommendations into the Cap and Trade Auction Revenue Program.
- Include representation of public health agencies in Cap and Trade Revenue Program decision-making, criteria identification, implementation, and evaluation processes to maximize health co-benefits.
- Incorporate ongoing health data collection and monitoring into projects and policies to determine if they achieve stated health goals and outcomes; modify projects and policies as needed to achieve stated public health outcomes.
- Provide resources to support local health department engagement to optimize health considerations and co-benefits.

The Public Health Alliance of Southern California stands ready to assist in Cap and Trade Revenue Program planning, implementation and evaluation to help ensure that health co-benefits are maximized and the health of our communities is protected and enhanced.

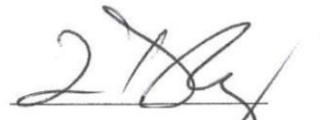
Sincerely,



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