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Department of Health
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Department of Public Health

City of Pasadena
Public Health Department

County of Riverside
Department of Public Health

Santa Barbara County
Public Health Department

County of San Bernardino
Department of Public Health

County of San Diego
Health and Human Services
Agency

Ventura County
Public Health

Mary Nichols, Chairperson
California Air Resources Board
1001 I Street
Sacramento, CA 95814
CC: Clerk of the Board

Re: AB 32 Scoping Plan Comments

March 10, 2017

Dear Chairperson Nichols and Members of the Board,

The Public Health Alliance of Southern California is a coalition of 9 local health departments. Collectively, the members have statutory responsibility for the public health of 60% of California's population. We strive to prevent the conditions that cause poor health, well before residents must visit the doctor's office. The prestigious British medical journal, the Lancet, has identified climate change as the biggest global health threat of the 21st century". As public health professionals charged with protecting and promoting the health of the population, the Alliance is particularly committed to addressing the disproportionate health impacts of climate change on vulnerable populations.

The Alliance strongly supports the leadership that the California Air Resources Board (CARB) has taken in developing the proposed 2030 Scoping Plan. This plan represents an unmatched opportunity to protect California residents from the health impacts of Climate Change. To achieve this goal, and maximize the health benefits of the plan, we recommend that CARB:

- 1. Evaluate the health impacts of Scoping Plan measures and scenarios in both the plan document and Environmental Impact Report, and**
- 2. Integrate clear and ambitious Vehicle Miles Traveled (VMT) Reduction targets from the SB 375 target-setting process into the Scoping Plan.**

A rationale to support each recommendation is provided as follows:

Recommendation #1: Evaluate the health impacts of Scoping Plan measures and scenarios in both the plan document, and Environmental Impact Report (EIR):

We are pleased that CARB has included high-level health and equity discussions in the 2030 Scoping Plan. Although these statements provide a good general overview of the connections between health and the scoping plan, this overview does not currently analyze specific health impacts of the differing strategies and scenarios. It is also missing an analysis on the relative contributions of both health benefits and impacts as they affect population sub-groups. Because of the significance of the Scoping Plan as a guidance document, we urge you to fund an independent

contractor with experience in comprehensive analysis of health impacts of programs and policies to conduct a health equity assessment of the strategies and alternatives in the Scoping Plan. This study should assess the expected magnitude and distribution of health costs and benefits for each strategy. It should include projected changes to physical and mental health resulting from the strategies proposed in the scoping plan, including land use and transportation patterns, green infrastructure, energy efficiency, building design, and air quality. It is also fundamentally important that the analysis assess the distributional impacts and benefits of strategies and scenarios in different sub-groups of California's population.

A strong, independent analysis of public health impacts of the Scoping Plan is important in fulfilling statutory requirements. AB 197 stipulates that CARB consider the social costs, including impacts to public health, of emissions reduction measures included in this scoping plan. Additionally, CEQA states that public projects that may cause substantial adverse effects on human beings, either directly or indirectly, must prepare an Environmental Analysis (EA) that discusses health and safety problems caused by the physical changes. The Scoping Plan EA should consider the full range of potential health impacts, assess the cumulative impacts of these health effects, and analyze the likely distribution of potential impacts among population sub-groups. As written, the scoping plan section on Public Health (III.C, page 76) is primarily a qualitative description, and does not provide goals and policies. As a result, the EA lacks clear health impacts in the Mandatory Findings section page 171.

To fulfill AB 197 and CEQA requirements, a stronger health analysis should be included. The Alliance will be happy to serve in an advisory role, assisting CARB's contractor in identifying the parameters of these health analyses. We would also recommend that CARB routinely include a comprehensive health impact analysis on future scoping plans due to the significant reach and impact on public health. We believe this critical information will provide CARB and the public with a clearer sense of the health and equity benefits and impacts to aid in more informed decision-making.

Recommendation #2: Integrate clear and ambitious VMT Reduction targets from the SB 375 target-setting process into the Scoping Plan.

The Scoping Plan notes that VMT reductions are necessary to achieve the 2030 target, and includes reductions in the proposed scenario. The Plan further notes that these reductions will come from stronger SB 375 targets, as well as additional strategies identified in the Appendix C: *Vibrant Communities and Landscapes and Potential VMT Measures* document. Prior research indicates that Greenhouse Gas (GHG) reduction strategies that replace car trips with active transportation and transit use deliver extremely strong health co-benefits.¹ These strategies must be a key piece of California's climate change efforts.

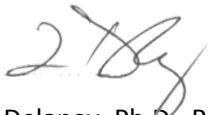
The Scoping Plan however, does not appear to set specific targets for VMT reductions for either of these programs. We recommend that CARB set ambitious targets for both SB 375 and for Appendix C—strong enough to meet our climate goals—and clearly spell out these targets in the Scoping Plan document. Additionally, we recommend that the Scoping Plan include additional detail regarding the steps that will be necessary to meet these targets. The plan includes ambitious active transportation goals (four-fold and nine-fold increases respectively for walking and biking). We strongly support these goals, and applaud the overall direction of the strategies included in Appendix C. However, neither the Scoping Plan nor Appendix C currently provides feasible strategies to achieve these targets. Stronger policy and funding commitments with clear implementation actions are needed.

¹ Maizlish, Neil, et. Al. "Health Cobenefits and Transportation-Related Reductions in Greenhouse Gas Emissions in the San Francisco Bay Area." *American Journal of Public Health* 103(2013): 703-709.

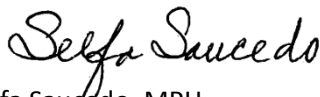
Similar specificity is needed for SB 375 and Appendix C in the EA. The EA includes “Increased Stringency of SB 375 2035 Targets for Sustainable Communities Strategies” as a measure within the project description. However, the project description does not contain adequate detail (numerical targets) to accurately determine environmental impacts. Additionally, while the Plan relies on the strategies proposed in Appendix C to meeting GHG reduction goals, these strategies do not appear in the EIR’s project description, and it is not clear whether they are included in the alternatives analysis. We encourage the many strong suggestions and strategies given in Appendices A and C to be clearly integrated into the Environmental analysis.

The Public Health Alliance of Southern California is deeply thankful for your efforts to address climate change and protect the health of California residents. We are pleased that the State has affirmed health co-benefits as a clearly stated goal of California’s climate policy. As such, it is our recommendation that all plans and policy documents should analyze health cost/benefit as a matter of course, and use this analysis to inform the resulting decision-making.

Thank you for your leadership on this issue, and your consideration of our recommendations. We look forward to continued work with you to ensure a sustainable and healthy future for our state.
Thank you,



Tracy Delaney, Ph.D., R.D.
Executive Director, Public Health Alliance of Southern California
tdelaney@phi.org
office: 619.452.1180
direct: 619.722.3403



Selfa Saucedo, MPH
Manager, Public Health and Behavioral Health Departments
Ventura County Health Care Agency
Chair, Public Health Alliance of Southern California
selfa.saucedo@ventura.org
office: 805.677.5231



S. Michael Johnson, MPA
Director, Public Health
City of Pasadena Public Health Department
michael.johnson@cityofpasadena.net
office: 626.744.6166