



October 22, 2021

Rajinder Sahota
Deputy Executive Officer
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Subject: Scoping Plan Scenario Inputs Technical Workshop Comments

Dear Ms. Sahota,

On behalf of the undersigned health and medical organizations, we are writing to provide comments on the September 30, 2021 Scoping Plan workshop. Californians know too well the local, direct health risks posed by climate change, and we believe that there is urgency in acting now to approve and implement a Scoping Plan that maximizes greenhouse gas emissions reductions through programs that also mitigate present-day health risks and prevent disproportionate impacts on disadvantaged communities.

Central to the 2022 Scoping Plan must be a scenario that relies on direct, near-term emission reduction strategies that cut harmful pollution to achieve and exceed California's 2030 climate reduction targets. The priority must be on reducing greenhouse gas emissions and local air pollutants in disadvantaged communities through new direct emission reduction measures and accelerating existing programs that increase health benefits such as sustainable communities built around healthier, active transportation choices.

- The strategies must favor ramping down all combustion sources as quickly as possible, exceeding 2030 statutory standards and achieving Carbon Neutrality (CN) as rapidly as possible.
- The final measures – and their development – must be informed by evaluations that shed light on health benefits and potential health risks of strategies deployed to reduce climate pollution.

As the process for developing scenarios for broader evaluation of the Scoping Plan continues, we offer the following comments and questions for your consideration:

- The Scoping Plan scenarios must favor strategies that meet and exceed the 2030 climate target through direct emission reductions and that phase combustion out in California as rapidly as possible.

- CARB should select the strongest direct emission reduction strategy possible within each category to achieve the 2030 carbon target and CN as rapidly as possible. A “menu approach” may result in a draft Scoping Plan scenario that achieves CN between 2035 and 2045. Ultimately, the strongest, most health protective and health beneficial strategies should be prioritized and should come online as soon as possible.
- Health Evaluations of the scenarios should allow comparison of the health benefits and risks, including health equity impacts, of various strategies and scenarios so that CARB can incorporate both climate and health equity considerations into its deliberations. The California Department of Public Health, Office of Environmental Health Hazard Assessment, and external public health experts should be engaged in the health evaluations.
- Health evaluations of the scenarios must provide meaningful indications of the benefits or disbenefits associated with strategies outlined in the draft scenarios. To what extent will the health evaluations support answers to questions about the interactions between programs or health outcomes in California communities, such as:
 - What would the inclusion of carbon capture technologies mean for lost reductions in local air toxics and criteria air pollutant emissions, specifically in low-income and disadvantaged communities? Can carbon dioxide removal technologies and carbon capture and storage technologies be implemented in ways to ensure they do not sustain or increase reliance on fossil fuels or have an adverse impact on local air quality and public health, particularly in low-income and disadvantaged communities?
 - What would various design changes or expansion/contraction of program scale for the Cap-and-Trade program mean for local emissions of air toxics and criteria air pollutants, specifically in low-income and disadvantaged communities? Are there health benefits or risks associated with the use of any allowed offsets?
 - What health benefits would be lost through continued increases in vehicle miles traveled (VMT) and single-occupant vehicle use? What would continued development/ encroachment into natural and working lands mean for reliance on carbon capture technologies and local emissions?
- As noted in past workshops, the Health Evaluation intends to provide information on improvements in outdoor air pollution, scenarios to maximize health benefits and insight into health savings within disadvantaged communities. Health Evaluations of the scenarios must include estimated benefits of reducing VMT.
 - The Integrated Transport and Health Impact Model (ITHIM) housed on the California Department of Public Health’s website notes that achieving the 2017 Scoping Plan metrics for active transportation could yield significant health benefits through reduced chronic illness and avoid over 10,000 premature deaths.¹ ITHIM metrics should be included in the Scoping Plan Health Evaluation section.
- A range of VMT reduction targets were presented within the scenario discussions. The fact is that a decade of implementation of California’s law to address greenhouse gas emissions through land use and transportation planning is not generating anticipated

¹ Maizlish N, Tomari K, Jiang C, Weiher A, Grajdura S, London JK, Rudolph L. California ITHIM, R/Shiny Version. User’s Guide and Technical Manual. Davis, CA: University of California; 2019. Integrated Transport and Health Impact Model (ITHIM). <https://skylab.cdph.ca.gov/HealthyMobilityOptionTool-ITHIM/>

results. In fact, CARB's own assessment noted that "real-world results are falling significantly short of the SB 375 targets and are moving in the wrong direction."² Further, the Annual California Greenhouse Gas Emission Inventory for 2021 noted: "*while progress around deployment of cleaner vehicle technology and fuels was significant, it was also dampened by continued increases in per capita vehicle miles travelled from passenger vehicles.*"³

- CARB should include a clear checklist of actions to be taken by all relevant local, regional and state agencies to provide accountability and tracking. As an example, a tracking and reporting approach was included in the California State Transportation Agency's Climate Action Plan for Transportation Infrastructure.⁴
- For zero-emission vehicles, CARB should follow strategies that, at a minimum, track with the modeling performed for the Mobile Source Strategy. The rapid and widespread transition to zero-emission cars, buses and trucks is critical to achieving clean air and climate standards. CARB should not include strategies in the Scoping Plan or adopt standards that are weaker than the Mobile Source Strategy modeling that envisions robust early markets and full zero-emission vehicle and truck sales by 2035.

The measures that follow from the Scoping Plan must be crafted, adopted and implemented quickly to protect public health to the greatest extent possible using the most robust health evaluation tools available. We look forward to our ongoing work together on this important process.

Sincerely,

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Will Barrett
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² California Air Resources Board. *2018 Progress Report: California's Sustainable Communities & Climate Protection Act* at p. 21. November 2018. https://ww2.arb.ca.gov/sites/default/files/2018-11/Final2018Report_SB150_112618_02_Report.pdf

³ California Air Resources Board. *California Greenhouse Gas Emissions for 2000 to 2019: Trends of Emissions and Other Indicators* at p. 12. July 2021. https://ww3.arb.ca.gov/cc/inventory/pubs/reports/2000_2019/ghg_inventory_trends_00-19.pdf

⁴ California State Transportation Agency. *Climate Action Plan for Transportation Infrastructure, Appendix A: Implementation Strategies & Actions Matrix*. July 2021. <https://calsta.ca.gov/-/media/calsta-media/documents/capti-2021-calsta.pdf>