



August 15, 2008

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 are especially concerned about impacts to vulnerable individuals including seniors, people with heart or lung disease, children and infants. We greatly appreciate the hard work of CARB staff in developing the draft-scoping plan to implement AB 32 and address these problems, but believe the plan needs substantial strengthening.

Air pollution already drives high mortality and morbidity numbers and global warming will only make this situation worse. The state is currently experiencing up to 24,000 premature deaths, 350,000 asthma attacks, thousands of hospitalizations and emergency room visits, and millions of missed school and work days from respiratory and cardiac illnesses caused by pollution. In addition, research shows that children in polluted areas of the state are growing up with reduced lung capacity due to pollution exposures that slow and stunt lung growth and development.

Global warming will pose a range of other health challenges to our communities at the same time we are dealing with the severe air pollution problems. Global warming is expected to increase sickness and death from heat waves and weather extremes, water pollution, increased and more widely distributed vector populations, increased potential for food-borne illness and other environmental challenges.

Clearly, public health must be a key consideration in the development of the scoping plan and other AB 32 related implementation activities. In order to make this happen, there needs to be a much higher level of engagement with the public health community, through both public health agencies and organizations. While we appreciate that CARB has committed to do a public health analysis of individual scoping plan measures, we are concerned that this is only a beginning. We urge the board to take the following actions:

- 1) Establish a broader role for the public health community in the development of the scoping plan and broader implementation of AB 32.** State and local public health agencies and organizations should have a formal and ongoing role in reviewing plans and strategies for greenhouse gas reduction and provide input on both the broader public health impacts of the

mix of proposed measures (including gaps where additional measures could improve public health benefits) and the specific health benefits and concerns related to individual measures. Public health input is needed at every step in the process of developing mitigation measures and strategies to reduce global warming, both prior to and after the adoption of the scoping plan. When implementation begins, public health support can facilitate the public and community support needed for the local and regional changes.

2) Change the priorities and commitments in the scoping plan to better reflect public health concerns and provide a higher level of public health protection:

- **Elevate the priority of significant shifts in transportation and land use in the scoping plan.**
Given that 40% of greenhouse gases emanate from vehicles and vehicles are also a strong source of smog precursors, contributing to respiratory and heart disease, the state should place a much higher priority on efforts to reduce personal driving and commercial transportation. 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.
- **Establish measures to promote healthier communities including a stronger focus on reduction of vehicle miles traveled.**
The scoping plan must include a stronger statewide goal for reducing vehicle emissions and stronger measures to promote transit and changes in land use and transportation patterns that reduce personal driving.
- **Set strong regional goals for greenhouse gas reduction**
As part of the push toward healthier communities, the state should establish strong regional goals to spur local action backed up by increased state resources to revise local and regional plans to support AB 32 goals.
- **Take a cautious approach toward cap and trade**
CARB should approach market-based measures cautiously, limit their use and apply appropriate safeguards to ensure emission reductions are real, verifiable, surplus and permanent. In addition, CARB should ensure that pollution sources pay for emission allocations rather than allow free distribution. Cap and trade must not lead to further adverse impacts on communities already disproportionately impacted by the regulated industries and sectors, chronic disease and injury, and little or no access to health care.
- **Focus on local health benefits of scoping plan measures, especially with regard to environmental justice communities.**
The plan must not only prevent creation of pollution “hot spots” and real “heat islands”, but should also demonstrate that measures will improve air quality and health conditions in local communities. Communities especially affected include those near ports, goods movement, power plants, agricultural and other industrial pollution sources.
- **Direct revenues to assist community-level mitigation efforts.**

CARB should ensure that additional state revenues raised through greenhouse gas fees or cap and trade programs are directed to assist local community global warming mitigation and adaptation efforts, especially in environmental justice communities.

3) Engage the public health community in development of strategies for public outreach and messaging on global warming and mitigation strategies. Building public support for mitigation strategies will be critical to the success of the state's efforts. Public health forces have considerable expertise and experience in reaching out to and educating diverse communities, as well as helping structure the policies and environments to motivate and support healthy behavior change.

The CARB scoping plan currently estimates health benefits valued at \$2 billion, including reductions of premature deaths, asthma attacks and respiratory symptoms. While these numbers are significant, 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.

Californians are in the middle of a public health crisis as evidenced by high levels of air pollution related illness, chronic disease associated with obesity and physical inactivity, and other health issues. The serious environmental challenges brought on by global warming will quickly overwhelm health service systems, particularly for low-income communities. 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 development of a strong, health protective, greenhouse gas reduction plan.

Sincerely,

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