



ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY
PUBLIC HEALTH DEPARTMENT

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

On behalf of the Alameda County Public Health Department, I would like to extend my appreciation for your hard work on developing a multi-faceted and comprehensive approach to reducing greenhouse gas emissions. We were pleased with many of the changes presented in the final version of the Scoping Plan. We are especially grateful for the final version's emphasis on the role of land use planning and local government in meeting the goals of the plan, as well as the inclusion of the California Department of Public Health on the Climate Action Team.

As presented in our July 30, 2008 comments on the Draft Scoping Plan, our Department serves a community that is plagued with health and social inequities. After controlling for genetics, access to health care, and risk behaviors, the remainder of the gap in health outcomes between rich and poor is a consequence of health and social conditions. These conditions are a product of historical, institutional forces. Because of the lasting impact that public policy can have on the health of the communities we serve, we are committed to making sure that any state-wide plan for reducing greenhouse gas emissions does not do so at the expense of our most medically vulnerable communities.

Before the board adopts the final plan, we are urging you to take the following actions to protect the health of the communities that we here at ACPHD are committed to improving:

1. Establish and formalize a role for Public Health in the implementation of AB 32 regulatory and market strategies.

While I applaud your inclusion of CDPH on the Climate Action Team, as well as your in-depth public health analysis in the appendix of the scoping plan, it is imperative that in implementing a market-based strategy for GHG reduction (such as Cap and Trade), public health has a place in the discussion. Cap and Trade's emphasis on efficient outcomes could have a negative impact on equitable outcomes if environmental justice concerns are not recognized. There are ways to pursue both equity and efficiency within a Cap and Trade system. Many of the details of the actual implementation of this program are still debatable, and as this discussion moves forward, public health voices must be sought out.

We ask that you direct your staff to come back in three months with recommendations for establishing a formal process to include state and local public health agencies and organizations in the development and review of all proposed GHG reduction measures, including proposed regulatory and market mechanisms.

2. **Ensure protection for already over-burdened communities.**

As mentioned in the previous point, mitigation strategies such as cap-and-trade or siting of new “green” facilities must not exacerbate already existing health inequities in low-income communities. In other words, there is no reason to sacrifice equity for efficiency. In our July 30, 2008 comments on the draft scoping plan, we showed that residents living in one of our most environmentally oppressed communities, West Oakland, can expect to die, on average, more than a decade before their more affluent counterparts in the Oakland Hills. People living in West Oakland breathe three times more diesel particulates than other Bay Area residents. While we understand that there are no proven localized health impacts of GHG emissions, our concern is with the co-pollutants that are also emitted from these facilities, as well as the pollution created by industry in the non-capped sectors. We ask that you establish additional measures in the scoping plan to identify and ensure protection of the vulnerable and low-income communities through the following actions:

- Establish within one year a cumulative impacts screening protocol, in cooperation with public health and environmental justice organizations, to identify those communities in the state most impacted by air pollution.
- Increase the percentage of permits to be auctioned in the cap-and-trade program. Re-allocate funds collected so that high-impact communities benefit from the permits sold. The ARB itself contends that 100% auction is a “worthwhile goal”. These funds can be used for improving communities and achieving further reductions in GHG emissions by funding public transit programs, walking and biking infrastructure, and vehicle efficiency subsidies. Furthermore, funds from permits sold must be diverted towards the career and technical education recommendation offered in the final version of the scoping plan.
- Include provisions to establish rigorous local emissions caps in addition to regional caps to ensure that the identified “hot spots” will not experience increased emissions levels.
- Technical and Financial Assistance to small businesses, especially those owned by people of color and women, to ensure that these businesses are able to reduce emissions without high financial strain.
- Ensure that “green” jobs created through the implementation of GHG reduction strategies are paid a living-wage, are safe, and are available to California residents who do not hold a college degree. It is important that the ARB recognize and report the number of jobs created that are “new” vs. the number of jobs created that are “transfers.”

3. **Set a higher target for GHG emission reductions from the land use sector.**

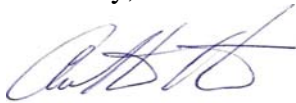
The new plan more than doubles the goal for emissions reductions from the land use sector. While this is great news, the current target of five million metric tons (MMT) is not in concert with achieving our 2050 GHG reduction goals. We should be reducing our Vehicle Miles Traveled by 10% by 2020, but the current target equates to only a 4% reduction in VMT. Reducing VMT not only contributes to a reduction in harmful GHG emissions, it also *greatly* reduces harmful particulate matter. The majority of particulate matter in the air comes not from the tailpipe, but from the dust and dirt kicked up from a car or truck tire. Communities like West Oakland bear the brunt of this poor air quality. This community in particular is situated directly next to the Port of Oakland and sits between two heavily traveled freeways, I-880 and I-580. This is another example of public policy having a significant health impacts throughout generations—they have the highest rates of asthma-related hospitalization within the entire county, and West Oakland children under five years of age have ER asthma visits at a rate of three times the county average.

Smart land-use planning that gives residents *viable* alternatives to driving can reduce GHG emissions, improve air quality, increase physical activity levels, and reduce obesity-related illnesses such as diabetes and cardiovascular disease. Well-designed communities also have the added benefit of increased social capital and lower crime. More powerful incentives for smart growth must be implemented as a part of this plan.

CARB should increase the goal for emissions reductions due to smart land use planning to 11-14 MMT. This would send an important signal to create communities that enable people to get out of their cars and walk, bike, or take public transit—improving their own health while improving the health of the planet.

Thank you for all your hard work on this plan, and for considering our suggestions. California has always been a pioneer in environmental, health and social protections, and the passage of this plan will cement our place as a leader in fighting climate change and health inequities.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Anthony Iton', written in a cursive style.

Anthony Iton, MD, JD, MPH
Director and Health Officer
Alameda County Public Health Department