



January 17, 2017

Chairman Mary Nichols  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95819

**Re: Support for SLCP Strategy Proposal**

Dear Chairman Nichols and Members of the Board:

On behalf of the American Lung Association in California, Public Health Institute and Center for Climate Change and Health, we write in support of the Short Lived Climate Pollution (SLCP) Reduction Strategy and call for the California Air Resources Board to move as quickly as possible to adopt the plan and act to cut these super pollutants that threaten our climate and the health of local communities. We believe that CARB has prepared a strong plan and that the Legislature's passage of Senate Bill 1383 (Lara) set California on a strong path to take on this unique and urgent public health.

***Implementing the SLCP Strategy provides an important opportunity to reduce local health burdens while safeguarding our climate.*** The role of black carbon, methane and fluorinated gases in accelerating climate change call for strong and immediate action to reduce these harmful pollutants. In addition to the well-documented threats posed by particle and ozone pollution, the growing scientific research and knowledge of the threats posed by unmitigated climate change support the need for strong and elevated action. ARB's SLCP Strategy is an important response to this growing realization that climate change is first and foremost a public health issue.<sup>1</sup> We believe the SLCP Strategy can provide significant local health benefits, including:

- improved local air quality through reductions in ozone and particle pollution
- reducing local health impacts of direct residential wood smoke and diesel emissions
- reducing food insecurity and food waste through organic diversion from landfills

***We encourage CARB to implement the SLCP Strategy and associated measures to achieve these and other associated health benefits, as quickly as possible.*** All efforts should be made to achieve the super pollutant targets established in Senate Bill 1383 in advance of 2030. Given the urgency of the climate challenge, we encourage CARB to:

- ***Work closely with local air districts to pursue the phase out of residential wood burning*** as a key step to reduce climate and local air quality impacts.

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<sup>1</sup> The 2016 US Global Change Research Program report "The Impacts of Climate Change on Human Health in the United States: A Scientific Assessment" detailed many climate change public health threats due to: increasing air pollution, extreme heat, drought, wildfires, water and food security, expanded diseases, extreme weather and mental health impacts.

- Incentive funds available to reduce emissions caused by residential wood burning should be used on non-wood burning devices given the long life of wood burning devices, maintenance requirements and user behavior that drive the effectiveness of emission levels – even in US EPA-certified devices. CARB should follow the lead of the Bay Area Air Quality Management District and move toward prohibiting the use of incentive funds for wood burning devices and prioritizing funds for the most climate-friendly heating technologies, such as electric heat pumps.
- ***Adopt strong regulatory solutions for cleaning up diesel pollution***, including strengthening and finalizing the Sustainable Freight Plan to support the widespread electrification of the freight sector and capping reductions at freight facilities that draw significant diesel emissions burdens to local communities.
  - Incentive funds will play an important role in achieving emissions reductions in advance of 2030 and should be deployed early and efficiently to reduce emissions in advance of regulations, especially in the dairy methane sector.
- ***Finalize the oil and gas regulation*** to reduce methane emissions leaks through thorough and regular monitoring and maintenance of pipelines and infrastructure that can emit other harmful pollutants and contribute to the formation of ozone.
- ***Move forward as soon as possible with critical dairy methane emission reduction programs***, including the development of dairy methane reduction regulations and implementation of dairy methane reduction pilot projects that demonstrate the mix of strategies available to reduce methane, including pasture-based management projects.
- ***Coordinate closely with CalRecycles to successfully achieve key reductions in methane emissions from landfills***, including recovering 20% of edible food to advance the fight against food insecurity and the overall goal of 75% diversion of organic waste from landfills.

The American Lung Association in California, Public Health Institute and Center for Climate Change and Health look forward to working closely with the Air Resources Board as the SLCP Strategy is implemented.

Sincerely,

Bonnie Holmes-Gen  
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**American Lung Association in California**

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Director  
**Center for Climate Change and Health**

Matthew Marsom  
Vice President for Public Policy and Programs  
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