

## **Draft Priorities For CARB on HIA on C&T:**

### **A. Process Issues:**

- Put in “placeholders” in the draft C&T regulations for results from HIA “to be provided” at a later date similar to what was done with PDR re: EAAC report.
- Some groups suggest that the release of the next iterative draft C&T regulation be postponed at least until the CARB/DPH HIA is completed. We understand there is additional health impact analysis underway through assistance from foundation funding that also should be taken into consideration, however, this analysis will not be completed until Summer 2010.
- Integrate HIA analyses into the rulemaking document and ensure that similar analyses be performed each time the rule gets modified or changed.

### **B. Prioritization Areas:**

#### **Communities:**

- Integrate the Cumulative Impacts and Disadvantaged Communities study with the HIA. The HIA should include evaluation of 3-4 communities identified as most at risk through utilizing Pastor et al.’s method that combines the three factors – pollution burden, land use and socio economic vulnerability.

#### **Policy Levers:**

- Evaluate a scenario in which an emitter under the C&T regulatory scheme would be able to actually pollute more (through buying allowances/offsets; producing more, etc.) as compared to the baseline scenario.
- Analyze a “worst case” offset scenario (i.e. a facility uses the maximum amount of offsets it is allowed (4% of compliance obligation) and is allowed to buy additional allowances that become available in the system through offset-allowance arbitrage.
- We recommend a two step process in the HIA:
  - 1) Evaluate scenarios based on percent of allowances auctioned and offset limits.
  - 2) Analyze scenarios that could boost the health benefits of the regulation such as:
    - a. Adaptation and mitigation investments
    - b. Provisions to maximize co-benefits (i.e. trading restrictions)
- Insure that each alternative scenario includes appropriate bounding – i.e. include a study of worst case situations from a public health perspective.

#### **Health Outcomes:**

- Provide estimated co-pollutant levels under each alternative scenario.
- Include listing and some evaluation of non-air related health outcomes, even if it is only qualitative.
- Analysis should include a “no change” scenario (e.g., things stay as bad as they are) in communities overburdened by pollution. Need to include in the HIA methods of measuring/identifying health impacts of “lost opportunities for improvements” and continuation of health inequities.

**Sectors:**

- Refineries, cement and power plants are key priorities.