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September 24, 2018

File Number 7300400

Ms. Mary D. Nichols, Chair
California Air Resources Board
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Dear Chair Nichols:

Subject: Assembly Bill 617 Community Air Protection Program – Community Selection and Program Requirements

The San Diego Association of Governments (SANDAG) appreciates the opportunity to comment on the proposed Assembly Bill 617 (AB 617) Community Air Protection Program requirements and selection of initial communities.

As the Metropolitan Planning Organization for the San Diego region, SANDAG is responsible for preparing a Sustainable Communities Strategy that integrates the region's land use and transportation plans to show how future investments and policies will reduce greenhouse gas emissions. SANDAG also is charged with identifying transportation strategies to reduce pollution exposure in disadvantaged communities, as designated pursuant to Health and Safety Code Section 39711. As such, the AB 617 Community Air Protection Program will be an important resource for the implementation of the region's Sustainable Communities Strategy and related efforts.

With this in mind, SANDAG would like to comment on the following components of the 2018 Community Recommendations Staff Report and Final Draft Blueprint.

2018 Community Recommendations Staff Report – Portside Environmental Justice Neighborhoods

SANDAG supports the staff recommendation to include the Portside Environmental Justice Neighborhoods in the San Diego County Air Pollution Control District in the selection of initial communities for air monitoring efforts. Providing funds to help better identify baseline air pollution levels and the emissions sources contributing to air pollution exposure in these neighborhoods will help inform local and regional planning efforts as well as position the Portside Environmental Justice Neighborhoods to move into the AB 617 emissions reduction program in subsequent years.

Final Draft Blueprint

SANDAG supports the community-focused framework that will be used to implement the Community Air Protection Program. With an increasing number of state funding opportunities available to address air pollution, it is critical that AB 617 investments be coordinated with other government agency policies and investments, including the California Air Resources Board, California Energy Commission (CEC), California Public Utilities Commission, and Caltrans, to reduce air pollution in the San Diego region. For example, the San Diego Port Tenants Association currently has a CEC grant-funded project underway as part of the California Sustainable Freight Action Plan and SANDAG is making investments throughout the region to support the transition to zero-emission mobility options. The steering committees envisioned under AB 617 will be an important forum to help leverage these investments to advance locally driven solutions. SANDAG appreciates the inclusion of land use and transportation agencies on the Steering Committee and looks forward to working with the Portside Environmental Justice Neighborhoods Steering Committee to advance balanced solutions in support of the region's mobility and sustainability goals.

SANDAG also encourages the Air Resources Board to use these steering committees to help inform the development of future regulations that integrate practical strategies with available technologies, leading to a balanced, community-based emissions management program. Having both public and private stakeholders at the table will enable the best ideas from the community to be vetted by the implementing parties, thereby ensuring that the solution fits the problem and that the technologies are indeed implementable.

SANDAG has a long history of working closely with local jurisdictions and stakeholders to reduce greenhouse gas emissions through sustainable transportation projects, programs, and services. The Community Air Protection Program is an opportunity to enhance these efforts. In particular, AB 617 investments will inform San Diego Forward: The 2019-2050 Regional Plan by helping to identify strategies that will mitigate air pollution in an effective and impactful way.

Thank you in advance for your consideration of these comments. If you have any questions or comments, please contact Robyn Wapner at (619) 699-1994 or robyn.wapner@sandag.org.

Sincerely,



KIM KAWADA
Chief Deputy Executive Director

KKK/RWA/mmo