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December 6, 2019

Ms. Mary D. Nichols, Chair  
 California Air Resources Board  
 1001 I Street  
 PO Box 2815  
 Sacramento, CA 95812-2815

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Dear Chair Nichols: *Nancy*

Subject: Assembly Bill 617 Community Air Protection Program – Selection of 2019 Communities

The San Diego Association of Governments (SANDAG) appreciates the opportunity to comment on the proposed selection of Assembly Bill 617 (AB 617) Community Air Protection program 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 is also charged with identifying transportation strategies to reduce pollution exposure in disadvantaged communities, as designated pursuant to Health and Safety Code Section 39711. With this in mind, SANDAG would like to comment on the following components of the "Community Air Protection Program: 2019 Community Recommendations Staff Report."

IV.a. The Portside Environmental Justice Neighborhoods Community

SANDAG participates as a member on the AB 617 Community Air Protection Program Portside Environmental Justice Neighborhoods (Portside Community) Steering Committee and has worked with the San Diego County Air Pollution Control District (SDAPCD) and the Steering Committee to develop a community air monitoring plan. Through this effort, the Portside Community has identified the area's need for emissions reductions through a mobile source monitoring effort, and the SDAPCD has continued support in emissions inspections and compliance efforts while encouraging emissions reductions through incentive funding. Consistent with the recommendations from the Steering Committee, SANDAG therefore supports the California Air Resources Board (CARB) staff recommendation to transition the Portside Community to develop and implement a community emissions reduction program. Providing funds to help develop achievable emissions reductions, performance metrics, and an enforcement plan will help to implement the Portside Community's community air monitoring plan, and the information identified in this community emissions reduction program will be an important resource for the implementation of the region's Sustainable Communities Strategy and related efforts.

Appendix A: 2019 Community Nominations

SANDAG supports the SDAPCD nomination to select the International Border Community, which includes the communities of San Ysidro and Otay Mesa, for a community air monitoring program and community emissions reduction program. The International Border Community has not been recommended by CARB staff for selection as a new community in this program cycle; however, the International Border Community has the highest traffic percentile in the state and its PM2.5 levels are in the 95+ percentile. Additional monitoring is needed to reduce the elevated pollution levels and better protect the residents of San Ysidro.

In fact, recognizing the air quality impacts from idling vehicles at the U.S.-Mexico border, SANDAG and Caltrans District 11 received funding from the Senate Bill 1 Trade Corridor Enhancement program to implement Phases I through III of their California Sustainable Freight Action Plan "Advanced Technology Corridors at Border Ports of Entry" pilot project, which includes a real-time border wait times system near the Land Ports of Entry for the traveling public and air quality monitors in the Otay Mesa community to compile emissions data. SANDAG hopes to coordinate with the SDAPCD and other stakeholders on integrating these air monitors into a future community air monitoring program and community emissions reduction program.

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. SANDAG commends CARB on its Community Air Protection program and will seek opportunities to leverage AB 617 investments in the development of San Diego Forward: The 2021 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 Ray Traynor at (619) 699-6987 or ray.traynor@sandag.org.

Sincerely,



HASAN IKHRATA  
Chief Executive Officer

HIK/KRO/mmo