



401 B Street, Suite 800  
San Diego, CA 92101-4231  
(619) 699-1900  
Fax (619) 699-1905  
sandag.org

February 20, 2017

File Number 7300400

Mr. Matthew Rodriquez, Secretary  
California Environmental Protection Agency  
1001 I Street  
P.O. Box 2815  
Sacramento, CA 95812-2815

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

Dear Secretary Rodriquez and Chair Nichols:

**SUBJECT:** Comments on Senate Bill 535 (De Leon, 2012) and Assembly Bill 1550 (Gomez, 2016) Implementation

The San Diego Association of Governments (SANDAG) appreciates the opportunity to comment on the California Environmental Protection Agency's identification of disadvantaged communities, as well as how to determine project benefits to these and other communities and households.

As the Metropolitan Planning Organization for the San Diego region, SANDAG serves as the forum for regional decision-making and is committed to promoting social equity and environmental justice in the regional planning process. SANDAG makes significant efforts to ensure meaningful public involvement to help bridge the gap between policy makers and traditionally underrepresented communities.

Implementation of Senate Bill 535 and Assembly Bill 1550 requirements will have a direct impact on the ability of SANDAG and other community partners to utilize certain funding streams in support of San Diego's most impacted communities.

**SB 535: Disadvantaged Communities**

SANDAG recommends the California Environmental Protection Agency (CalEPA) consider census tracts with the highest 30 percent of CalEnviroScreen (CES) scores as disadvantaged. While SANDAG appreciates the efforts taken by CalEPA to incorporate more information regarding San Diego's communities along the border, it appears that some of the new indicators in CES 3.0 have introduced additional data gaps that may prevent an accurate representation of asthma and cardiovascular disease rates throughout the region. Providing a higher threshold would enable communities that may have been unfairly scored to be represented.

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In particular, it appears that data from Veterans Administration and military hospitals are not included in the calculation of asthma and heart attack prevalence; nor are hospital visits across the border taken into account. Approximately 9.2 percent of San Diego residents are veterans compared to 5.5 percent statewide. Similarly, San Diego has a disproportionately high number of residents insured by the Department of Defense (DOD) that are eligible for emergency care at military hospitals and clinics. In fact, one-third of California residents covered by TRICARE live in San Diego (including 60,000 children). Many of these individuals are eligible for medical care from the Veterans Administration or DOD and thus may not seek emergency treatment from a hospital that reports data to the State of California to be used in the current CES 3.0 calculations.

In addition, research indicates that San Diego residents travel to Tijuana for medical care. A UCLA study of the California Health Interview Study found that 264,000 California residents traveled to Mexico for medical care in 2001. The same report indicates California residents seeking Mexican medical care are most likely living within 15 miles of the border. Supportive of these findings is the fact that several U.S. insurance groups offer plans with primary medical services in Tijuana and Mexicali.

As shown in Attachment 1, a 30 percent threshold will provide for a more geographically equitable representation of communities throughout the San Diego region.

#### AB 1550: Project Benefits

When considering transportation project investments, SANDAG encourages the Air Resources Board to: (1) focus on the access provided rather than the location of the actual project; and (2) include the entirety of any census tracts that fall within a half-mile of a disadvantaged or low-income community. Notwithstanding the physical location of investment, a transportation project should be determined beneficial as long as it can demonstrate mobility and/or accessibility improvements for a community or household that falls within the AB 1550 geographic boundaries.

The objective of transportation projects is to provide enhanced mobility between key destinations; solely geographic-based criteria does not allow for these access and connectivity benefits to be accurately recognized. As shown in Attachment 1, many residents in San Diego's state-designated disadvantaged communities commute outside of their neighborhoods for work. Limiting projects to those based entirely within a particular geographic space could preclude more impactful and sustainable transportation projects that connect disadvantaged/low-income communities and/or low-income households to education and employment centers in other parts of the region.

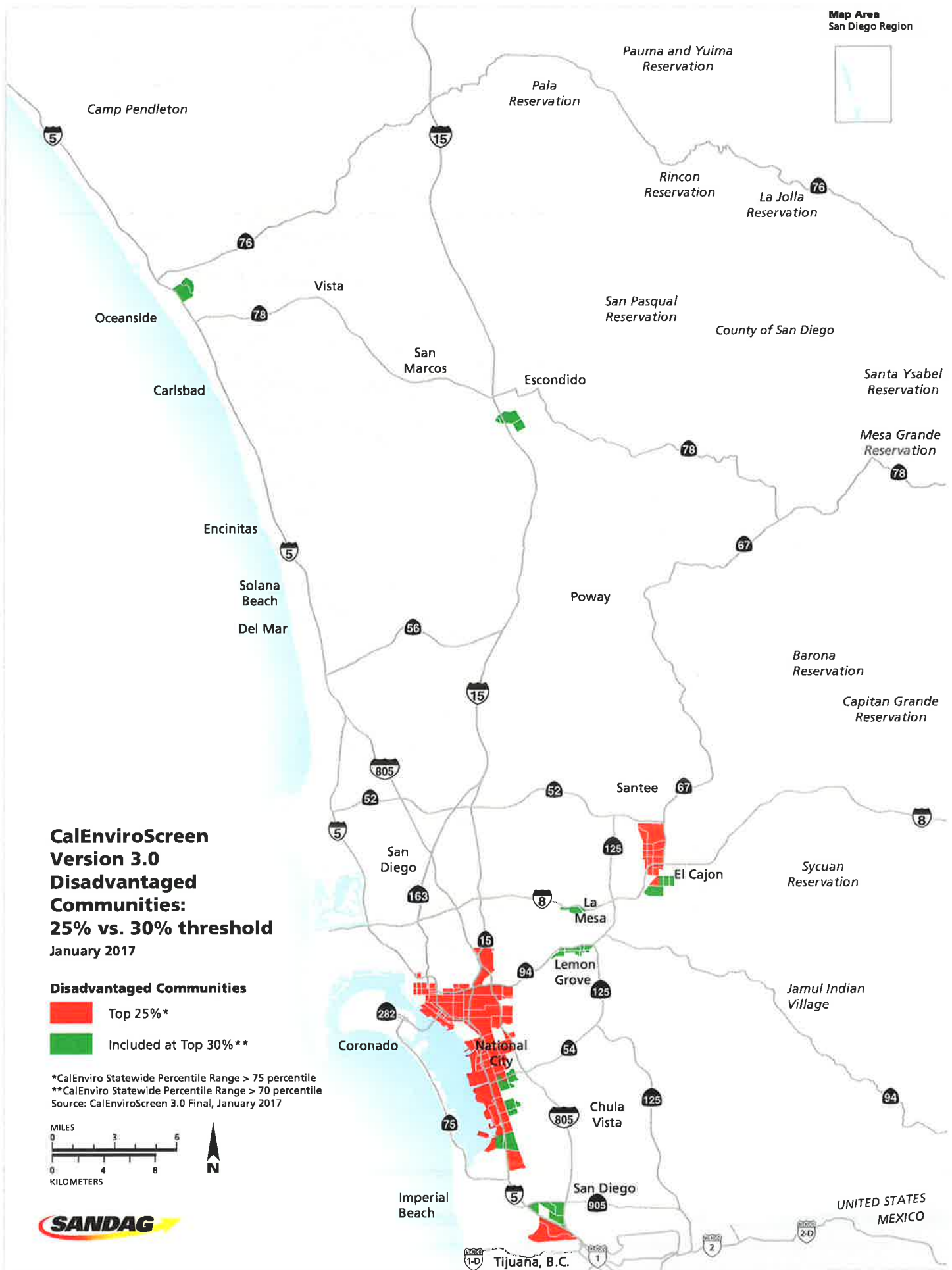
Thank you for the opportunity to comment on the implementation of SB 535 and AB 1550. If you have any questions, please feel free to contact Robyn Wapner, Senior Government Relations Analyst, at (619) 699-1994 or by email at [robyn.wapner@sandag.org](mailto:robyn.wapner@sandag.org).

Sincerely,

  
GARY L. GALLEGOS  
Executive Director

GGA/RWA/asa

Attachments: 1. CES 3.0 Disadvantaged Communities: 25% vs. 30% threshold  
2. Commuters from Disadvantaged Communities Place of Work

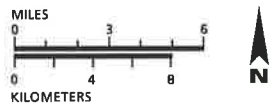


**CalEnviroScreen  
Version 3.0  
Disadvantaged  
Communities:  
25% vs. 30% threshold  
January 2017**

**Disadvantaged Communities**

- Top 25%\*
- Included at Top 30%\*\*

\*CalEnviro Statewide Percentile Range > 75 percentile  
 \*\*CalEnviro Statewide Percentile Range > 70 percentile  
 Source: CalEnviroScreen 3.0 Final, January 2017



**Map Area**  
San Diego Region

