



March 12, 2021

Richard W. Corey
California Air Resource Board (CARB)
Office of Community Air Protection
1001 I Street
Sacramento, CA 95814

Re: Request for Flexibility to Adopt Phase II of the San Diego Portside Community Emissions Reduction Plan

Dear Mr. Corey,

The San Diego Portside Environmental Justice Steering Committee (Portside Committee) is writing to respectfully request flexibility for an additional two-months to adopt Phase II of the Community Emissions Reduction Plan (CERP), which is currently due in June 2021. At its meeting on February 16, 2021 the Portside Committee discussed and unanimously voted in favor of sending this formal request for review and consideration. The Portside Committee and the San Diego County Air Pollution Control District (SDAPCD) have been diligently working together to implement Assembly Bill (AB) 617 (C. Garcia, 2017) and develop community-driven actions to reduce air pollution and improve public health in the San Diego Portside Community. In November 2020, the Air Pollution Control Board was presented with a draft CERP and a set of early-action strategies (Phase I) that were adopted for immediate implementation, while additional CERP strategies and actions continued to be developed and finalized (Phase II). This phased approach was the result of a six-month extension to finalize the CERP requested by the Portside Committee on May 29, 2020. The additional flexibility presently requested to adopt Phase II of the CERP will support the Portside Community in achieving a comprehensive final plan that meets the Community Air Protection Blueprint.

The Portside Committee and SDAPCD have made tremendous progress despite the challenges posed by the continued COVID-19 Stay-at-Home order. The Portside Committee and SDAPCD continue to meet monthly to identify strategies that focus on community priorities. Implementation of Phase I strategies (please refer to attached document: Approved Phase I Strategies) has initiated and progress is being made in the areas of outreach and community engagement, incentive programs, rule development, enforcement, and others. Additionally, monitoring efforts continue in the Portside Community with four active monitoring sites, four sites in the process of being established, and an additional four in the initial planning stages.

With the current deadline of June 2021 for the final CERP, the scheduled community engagement efforts, which include monthly meetings and two public workshops, are overlapping with CARB's outreach efforts regarding its review of SDAPCD's response to the July 2020 USS Bonhomme Richard Fire

that affected the Portside communities. Pushing the current timeline two months out will help lessen community burden caused by the competing engagement and document review requests and it would increase public and stakeholder participation.

Additionally, as of March 1, 2020 SDAPCD transitioned to an independent agency outside of the County of San Diego organizational structure as required by Assembly Bill 423 (Gloria, 2019) which amended State law to restructure and expand SDAPCD's governing board. The 5-member County of San Diego Board of Supervisors has served as the SDAPCD's governing board for over 65 years and as of March 1, 2021, AB 423 requires the appointment of a new 11-member governing board, which includes three members of the public. SDAPCD is working relentlessly to make this a smooth transition and to bring the new board members up to speed with the air district principles and operations. Extending the final CERP submission two months out would provide the new SDAPCD board with sufficient time to be fully seated, onboarded, and familiarized with SDAPCD's operations to better assess, evaluate, and consider the CERP for approval as required by the Community Air Protection Blueprint.

The proposed next steps for the Portside Committee and SDAPCD staff are to continue finalizing CERP strategies and actions in the areas of transportation and land use and continue to develop overall goals and associated timelines for the CERP. Milestones will include conducting a couple of public workshops in April and providing an update on CERP development to the APCD Board in May with the goal of presenting a final CERP for adoption in August 2021.

In closing, the Portside Committee and SDAPCD are highly committed to conducting meaningful community engagement to finalize a comprehensive CERP with strategies and actions that will reduce air pollution in our community. Your flexibility will ensure the accuracy, attention, and commitment the CERP demands will be met in benefit to the many residents of the Portside Communities.

Thank you for your consideration and we look forward to hearing from you.

Respectfully,

The San Diego Portside Steering Committee

Cc: Robert Reider, San Diego County Air Pollution Control District
Domingo Vigil, San Diego Air Pollution Control District
Deldi Reyes, California Air Resources Board
Vernon Hughes, California Air Resources Board
David Salardino, California Air Resources Board
Liliana Nunez, California Air Resources Board

Attachment: Approved Phase I Strategies