

May 27, 2020

Vernon Hughes, Acting Director
Office of Community Air Protection
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Via email to: vernon.hughes@arb.ca.gov

Re: Request for Time Extension for the San Diego Portside Community Emissions Reduction Plan

Dear Mr. Hughes:

The San Diego Portside Community Steering Committee (CSC) urges CARB to allow a 6 month extension for the continuing development of the Portside Communities Community Emissions Reduction Plan (CERP). The past six months have been fraught with unprecedented challenges for both the CERP and the SD Air Pollution Control District (APCD). Moving beyond the speed at which CERPs need to be developed in the typical timeframe, the CSC is identifying the following additional instability and bring this request forward with urgency.

The time available for community engagement has been compromised during the COVID-19 pandemic. This means that the process for developing the CERP is, from our perspective, unfair, and presents big challenges to cross agency collaboration and response as each agency is also pivoting for the economic and programmatic impact. As such, additional time for being able to develop the best emissions reduction plan possible during these unprecedented times would be required.

Challenge #1 - The APCD lead for the development of the Portside community, Mr. Jon Adams retired in January. This created instability from the outset of the CERP due to transition & APCD staff adjustments, and loss of contact information for CSC members and others interested in the CERP.

Challenge #2 – Stay-at-home order. On March 19th Governor Newsom issued a stay at home order to protect the health and well-being of all Californians and to slow the spread of COVID-19. APCD was directed to emergency operations status in order to assist County government. This forced the cancellation of the March 24, 2020 steering committee meeting and loss of time.

Challenge #3 – Community engagement and participation transition to virtual platform. The stay at home order presented the new challenge of transitioning public meetings to virtual platforms and this continues to be a challenge moving forward as families, individuals, and agencies adapt and use multiple platforms and become familiar with virtual engagement processes. Adaptation strategies for ensuring technology access, online platform training, and language interpretation are impacting community residents more

disproportionately due to the effects of income insecurity, housing stability, and individual family health and well-being ranking high as priorities.

Challenge #4 – Pending APCD chief retirement. On May 11, 2020 the SD Air Pollution Control Officer, Mr. Bob Kard, submitted his formal retirement notice from the district. Mr. Kard's last day at his post will be June 19, 2020. We applaud Mr. Kard's vision, leadership, and efforts, however, this again is a big moment of instability, internal APCD staff adjustment during the CERP development time, and leaves the APCD with two important vacancies.

Challenge #5 – Compressed timeline. Currently, the CERP schedule presents a draft CERP by August 2020 before it has to move forward for APCB and CARB approvals. With a complete loss of approximately 45 days due to COVID-19 and stay at home order before a process was re-established, it is unfair for the San Diego Portside CERP to be expected to provide the best strategies it can put forth. The timeline is now ultra-compressed with the development of strategies just beginning, and only having the months of June and July for completion.

In sum, focus for the development of the CERP is at its most critical moment and while we understand that work must, and will, continue, we also urge a sensible adjustment time for an additional 6 months be allowed for the benefit of the many residents of the San Diego Portside Communities.