



# San Diego County Air Pollution Control District

June 29, 2022

The City of San Diego  
The Department of Sustainability

To [Sustainability@sandiego.gov](mailto:Sustainability@sandiego.gov),

The San Diego County Air Pollution Control District (District) appreciates the opportunity to provide comments on the City of San Diego's Climate Action Plan (CAP) Draft. The District is mandated under federal and state law to regulate criteria air pollutant emissions from stationary sources such as commercial and industrial facilities and improve air quality to protect public health and the environment. Accordingly, the District operates countywide air quality permitting, monitoring, and enforcement programs to ensure compliance with applicable air pollution regulations for healthful air quality. The District's jurisdiction covers all of San Diego County, including both the incorporated and unincorporated areas.

As noted in the CAP, The District "works to improve the health and well-being of San Diegans through air quality improvements by ensuring commercial, industrial, transportation and agricultural businesses are permitted and comply with air pollution control laws; incentivizing cleaner technologies through grant opportunities; and monitoring, sampling and recording air quality using a network of equipment stationed around the county and alerting the region of air quality conditions."

In addition to regulating emissions from stationary sources the District conducts inspections of both on-road and off-road vehicles and equipment to ensure compliance with state regulations under a Memorandum of Understanding with the California Air Resources Board (CARB). The inspections range from heavy-duty trucks, busses, commercial vehicles operating on our roads and those vehicles transporting cargo to the Port of San Diego. The inspections are intended to ensure newer cleaner engines are being used and that pollution control devices such as diesel particulate filters (DPF) are installed and operating correctly. The District also enforces truck and bus idling regulations to prevent unnecessary emissions (idling greater than 5 minutes) and to prevent any idling around restricted areas (housing units, schools, hotels, motels, hospitals, senior care facilities or childcare facilities). There are also inspections conducted for commercial harbor craft and equipment being used at construction sites and other off-road operations.

Grants and Incentives - The District administers a number of state, federal, and local funding programs to reduce emissions from mobile sources including the Carl Moyer Program, Community Air Protection Program, Goods Movement Emission Reduction Program, Voucher Incentive Program and the Scrap Car Reimbursement Assistance Program. The District also plans to open a Clean Cars 4 All incentive program which will provide incentive funding for qualifying low-income residents of state-designated disadvantaged communities to trade in older passenger cars and trucks and replace them with newer



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hybrid and electric vehicles or other transportation options. Since 1999, the District has distributed over \$127 million dollars which has reduced total pollutants (VOC, NOx, CO, PM) by more than 1,700 tons per year.

Community Air Protection Program (CAPP) (AB 617) – The CAPP mission is to reduce pollution exposure in communities based on environmental, health and socioeconomic information. This first-of-its-kind statewide effort will require community air monitoring, community emission reduction plans, and incentive funding to deploy the cleanest technologies in the most impacted areas. The District currently has two communities as part of our CAPP program: the Portside Community (parts of Barrio Logan, Logan Heights, Sherman Heights, and National City) was selected in 2018 and in 2022 the International Border Community (encompasses parts of San Ysidro and Otay Mesa East) was selected to be part of the CAPP. The District appreciates the City's commitments embodied in the Portside Community Emissions Reduction Plan (CERP) and looks forward to working with the City and other partners to develop appropriate strategies for the International Border CERP. Implementation funding for this important program have not been increased since its inception, despite the addition of more communities, including the International Border Community, and expanding the CAPP program to other communities will certainly require additional resources. The District is working with other California air districts and stakeholders to attempt to bring more state funding to the CAPP program and would appreciate any actions the City can take to advocate for additional funds.

## Comments on the Clean Air Section of the CAP

The District has primary responsibility to reduce air pollutants and promote air quality in San Diego County and works in partnership with other agencies to reach our clean air goals. The District supports the City of San Diego's Climate Action Plan actions that can be taken to reduce air pollutants and greenhouse gases in the region, including:

- Integrate new codes to transition appliances from gas to electric energy use in both existing buildings and new developments (Strategy 1.1 and 1.2).
- Increase urban greening and tree planting, including in existing parks (Strategy 5.2).
  - The District recommends that the City consider integrating this strategy with Strategy 3.2 which promotes transit shelters/shade.
- The District appreciates the City support to reduce cancer risk below 10 per million from current risk of 100 per million for each stationary source of toxic air pollution, including portable equipment, in Environmental Justice Communities. District rule 1210 was recently revised to include this requirement for all sources of toxic air pollutants throughout San Diego County.

The Clean Air section of the CAP notes that the City has an important role to play and a responsibility to improve the health of our residents even though this has not traditionally been a focus or delegated responsibility under municipal jurisdiction. Through the City's authority over land use within the jurisdiction there are many opportunities to explore additional actions that could have a positive impact on air quality. As such, the District would also recommend considering the following land use strategies for inclusion in the CAP:



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- Include incentives/reduce permitting fees for rooftop solar (Strategy 1.1 and 2.1).
- Increasing indoor air quality standards for new construction through permitting with a focus on residential areas within 1,000 feet of freeway/highways.
- Set goals for weatherization and home improvement programs for older housing stock/communities.
- Incorporate new requirements in zoning/permitting to ensure the cleanest facilities, highest construction techniques for controlling emissions through the design/permitting process and regularly review/update community plans and zoning codes and policies to ensure that incompatible emissions sources such as industrial facilities are not located in neighborhoods where they pose a detrimental impact on air quality to residents.
- Strategies 1.3, 2.2, 4.2 and 4.5 include measures to reduce impacts from City controlled facilities, properties, and vehicle fleets. The District recommends providing sustainability metrics in the CAP to track emissions reductions from these and other measures including building decarbonization, ZEV fleet transitions, etc.

The District looks forward to our continued partnership with the City of San Diego and our shared goal of promoting public health in the region. Should you have any questions about these comments or District requirements please contact Air Quality Specialist, Eric Luther (858) 586-2806 or [eric.luther@sdapcd.org](mailto:eric.luther@sdapcd.org).

Sincerely,

*Eric Luther*

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