



# San Diego County Air Pollution Control District

July 11, 2025

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San Diego Association of Governments  
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San Diego, CA 92101

## **Subject: Community-Supported Priorities for SANDAG's Draft 2025 Regional Plan**

Dear SANDAG Board Members,

Thank you for the opportunity to comment on the Draft 2025 Regional Plan Transportation Network. Mobile sources account for the majority of air pollution emissions in the region, particularly in environmental justice communities. As such, the selection and prioritization of transportation projects and policies in the proposed 2025 Regional Plan represent a meaningful opportunity to significantly improve community health and quality of life for those most impacted by air pollution. This letter outlines specific community-supported programs and projects that we recommend be included in the final 2025 Regional Plan for completion by 2035.

The San Diego County Air Pollution Control District (SDAPCD) works to improve air quality for communities most affected by air pollution sources. This effort includes participation in the Community Air Protection Program (CAPP or AB 617), a collaborative initiative involving residents, SDAPCD, the California Air Resources Board (CARB), industry representatives, and other public agencies. Through Community Steering Committees (CSCs), these stakeholders work together to develop and implement strategies that reduce air pollution and improve public health. We appreciate SANDAG's partnership in this effort and the active participation of SANDAG staff in the Portside and International Border CSCs.

In the San Diego region, two communities participate in CAPP due to their disproportionate exposure to air pollution sources: the **Portside Community** (West National City, Barrio Logan, Logan Heights, and Sherman Heights) and the **International Border Community** (San Ysidro and Otay Mesa East). These communities have developed community-led **Community Emission Reduction Plans (CERPs)** to address air pollution from industrial and commercial activities, transportation, and other sources. CERP strategies are community-supported and include air quality rule development, incentives for zero- and near-zero-emission technologies, and land use and transportation planning recommendations.

The Portside Communities are traversed by the I-5 freeway, bordered by SR-94 to the north, and are adjacent to the Port of San Diego and freight-related industries (e.g., the Navy, shipbuilding, warehouses). The International Border Community includes the San Ysidro Port of Entry—North America’s busiest land border crossing—and is surrounded by I-5, I-805, and SR-905. According to CalEnviroScreen, San Ysidro ranks in the highest percentile for vehicle traffic in the State and is in the 95th percentile or higher for PM2.5 levels. As such, the transportation-related projects prioritized in the Portside and International Border CERPs have strong potential to reduce emissions in these communities and regionwide.

There are two key strategies at the center of International Border’s CERP transportation strategies: 1) *Support local, regional, and state plans that reduce vehicle miles traveled (VMT) and greenhouse gas (GHG) emissions throughout the community;* 2) *Support transit, pedestrian and bicycle infrastructure as a funding priority for local, regional and state transportation authorities.* SDAPCD would like to see these two guiding strategies to be the focal point and goal of the 2025 Regional Plan. There are also a variety of specific community-supported transportation programs and projects in the Portside and International Border CERPs. SDAPCD is pleased to see that several community-supported CERP priorities are already included in the Draft 2025 Regional Plan for completion by 2035 and would like to see them remain in the final 2025 Regional Plan. These include flexible fleet services, improvements to Blue Line and Rapid Bus services, and the development of a Smart Mobility Hub in San Ysidro (see **Appendix A** for a full list).

However, several other CERP priorities are included in the Draft 2025 Regional Plan but are currently scheduled for implementation beyond 2035. ***We respectfully request that the following projects, already listed in the Draft Regional Plan, be moved to Phase 1 for implementation by 2035:***

- Rapid Bus Service: New Rapid bus service connecting the border to the rest of the region (specifically, Project #19: Rapid 227: Otay Mesa East POE to Imperial Beach via 905).
- Implement New Rail Service: e.g., Purple Line to connect between the border, National City, City Heights, Kearny Mesa, and Sorrento Mesa (specifically, Project #11: Purple Line).
- Cross border Trolley: Extension of Blue Line Trolley service 1-mile into Tijuana. Coordinated customs inspection processing for vetting traveler information in advance of trip (specifically, Project #10: U.S.-Mexico Border Transit Connection).

In addition, several community-supported CERP projects and programs are not currently reflected in the Draft Regional Plan or its proposed network. ***We respectfully request that the following be explicitly included in the Plan and designated for Phase 1 implementation by 2035:***

COMMUNITY-SUPPORTED INTERNATIONAL BORDER CERP ACTIONS	RECOMMENDATION
Transit Demand Management (TDM) ordinance throughout the San Diego region with the intention to provide greater access to healthy foods, healthcare, recreational spaces, etc.	It is understood that SANDAG directly administers many Transportation Demand Management (TDM) programs and supports related policies both directly and indirectly. However, the Regional Plan does not propose a cohesive, region-wide ordinance to unify these efforts.
Coordinated Traffic signals to enhance the flow of traffic	While the Regional Plan supports many multimodal transportation improvements across the region, it typically does

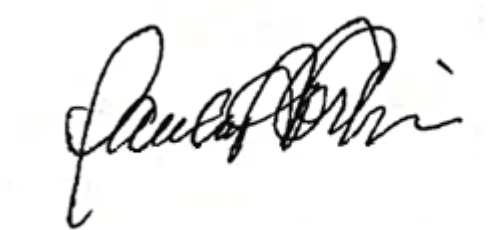
particularly at Dairy Mart, Calle Primera, and San Ysidro Boulevard.	not address specific local streets and arterial roads. It is also understood that local jurisdictions coordinate with SANDAG and other regional and state partners when their local projects include a regional component. However, given the binational context and the fact that San Ysidro ranks in the highest percentile for vehicle traffic in the state—contributing significant economic benefit to the region—the Plan should include a specific focus on improving local streets and arterials in San Ysidro. This should be explicitly listed as a near-term action in the Draft 2025 Regional Plan (page 31).
Evaluate and address the impacts of border traffic on local streets (i.e., the onramp to Mexico from Camino De La Plaza) and determine the best course of action to reduce idling vehicles on City streets.	
Evaluate transportation planning around Plaza de las Americas and support recommendations that improve traffic flow, reduce VMT, support walking, biking, and taking public transit, and reduce emissions from passenger vehicles.	
Pedestrian and Cyclist Amenities/Benefits: Amenities may include installation of shade and cool zones, landscaping to offset the emissions from cars, charging stations and seating, lighting, safety hotline, and patrolling officers to increase perception of safety at the POEs. All facilities would be ADA accessible. Real-time information and signage placed at key points can enhance wayfinding and keep travelers informed of travel and wait time changes.	While the Regional Plan supports multimodal transportation, it does not identify pedestrian and cyclist amenities as standalone projects. There is a missed opportunity to explicitly prioritize the improvement of amenities for people walking or biking—such as shade, cool zones, landscaping to offset vehicle emissions, seating, and lighting—as a performance measure under the goal area of "Safe transportation network for all users" (page 29 of the Draft Regional Plan).
Increase frequency of transit service to 10 mins during evening and weekend service at the Border in San Ysidro. (County of San Diego Regional Decarbonization Framework)	Although Project #13: Blue Line Improvements would evaluate options to increase service frequency, which could address this issue, there is a missed opportunity to include increased transit frequency as a performance measure under the goal area of "Convenient and reliable movement of people and goods" (page 29 of the Draft Regional Plan).
Provide real-time transit information.	While transit user amenities such as real-time information are considered and planned for in many transit projects, this is not identified as a standalone initiative. There is a missed opportunity to include real-time transit information as a performance measure under the goal area of "Convenient and reliable movement of people and goods" (page 29 of the Draft Regional Plan).
Cross border Transit Fare Incentives: Program to coordinate transit fare systems in both San Diego (via MTS) and Tijuana (via SITT) to incentivize use of transit by cross border travelers. Fares would be discounted (i.e., reduced price, free transfer onto either system) for trips taken via the	It is understood that while this isn't specifically called out as a standalone project, SANDAG continues to collaborate with partners in the U.S. and Mexico on joint strategies and advancement of programs and policies that could include fare incentives. However, this action item should be listed in the "near-terms" action list (page 31 of the Draft Regional Plan).

SITT system and MTS system on the same day and/ or specified time.	
Electrify transit equipment and vehicles.	We are pleased to see that the Draft 2025 Regional Plan Network includes electric transit fleets through new Neighborhood Electric Vehicle service areas. While it is understood that management of transit equipment and vehicle fleets is the responsibility of the transit operating agencies (such as MTS), and that SANDAG supports them through actions like securing funding for new vehicle purchases, there is a missed opportunity to explicitly commit to the transition to zero-emission transit vehicles and supporting infrastructure in the performance metrics under "Healthy communities and environment for everyone" (page 29 of the Draft Regional Plan).
Implement pedestrian and cyclist amenities which may include installation of shade and cool zones, landscaping to offset the emissions from cars, seating, lighting, sidewalks, crosswalks, bike lanes, ADA accessible, etc. (Specifically within San Ysidro and Otay Mesa).	While it is understood that these improvements are developed as part of broader regional transportation improvements at the project-level and that the Regional Plan proposes and supports many multimodal transportation improvements throughout the region, it does not specifically call out amenities as a standalone project. This makes it difficult for communities to know what specific improvements they should anticipate in their communities as part of the adoption of the Regional Plan.

We look forward to continuing to work in partnership with you and the communities we serve to ensure that the 2025 Regional Plan supports the sustainable movement of people and goods while protecting the health of residents most overburdened by transportation-related air pollution.

If you have any questions, please feel free to contact Shalem Aboody-López, Program Coordinator, at [Shalem.Aboodylopez@sdapcd.org](mailto:Shalem.Aboodylopez@sdapcd.org). We look forward to your response.

Sincerely,



Paula Forbis, Air Pollution Control Officer

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## Appendix A

### CERP Actions included in Draft 2025 Regional Plan to be Completed by 2035

COMMUNITY-SUPPORTED INTERNATIONAL BORDER CERP ACTIONS	PROJECTS INCLUDED IN DRAFT REGIONAL PLAN MARKED AS "BY 2035"
Smart Mobility Center/Mobility Hub: Multimodal transportation hub with amenities for travelers and to facilitate seamless travel connections. Primary amenities include, but are not limited to, secure bicycle storage, cross border bike share, transit and mobility services, internet access, travel information desks, clean restrooms, and Border Kiosks. Secondary amenities, include but are not limited to, park and ride facilities (with reservation options), safe pick up and drop off locations for shared mobility options (including scooters and bicycles), safe drop-off locations for travelers dropped off in passenger vehicles (including personal vehicles or taxis), rental cars, coffee shops, duty free shopping, and restaurants. All these amenities would be ADA accessible.	Project #36: San Ysidro Mobility Hub
Mobility Hubs: Implement near-term improvements to the San Ysidro Transit Center to enhance access, safety, and efficiency, while developing long-term investments in a future San Ysidro Mobility Hub to accommodate more robust mobility options (i.e., new rail and bus services) to ultimately induce mode shift away from personal vehicle travel through the port of entry. Longer term solutions integrate shared mobility services, transit supportive land uses, and supporting technology to increase mobility options and enhance equity, safety, and accessibility.	Project #36: San Ysidro Mobility Hub
Rapid Bus Service: New Rapid bus service connecting the border to the rest of the region (e.g., between San Ysidro and Downtown San Diego).	Project #29 Rapid 638: Iris Trolley to Otay Mesa; Project #30: San Ysidro to Santa Fe Depot; Project #31: Rapid 688: San Ysidro to UTC via 805; Project #42: Circulator Route 193: Iris Transit Center to San Ysidro High School; Project #43: Circulator Route 661: Otay Mesa Loop
Improve Existing Rail Service: e.g., Blue Line improvements to enhance accessibility, travel times/speeds, capacity, and frequencies for the most constrained segments of the Blue Line corridor. This would also include grade separations at key locations such as 28th St, 32nd St, E St, H St, Palomar St, and Blue/ Orange Track Connections at 12th/ Imperial	Project #13: Blue Line Improvements

Flexible Fleet Services: Implement flexible fleet programs to improve first/last mile connections in the border community (e.g., a free electric shuttle service to key locations to and from the border). This program could also supplement gaps in school shuttle and bus networks, business and work shuttles, shopping district shuttles, etc. Implementation could include public subsidies and public-private partnerships.	Project #50: NEV Service Area: San Ysidro/ U.S.-Mexico Border
<b>COMMUNITY-SUPPORTED INTERNATIONAL BORDER CERP ACTIONS</b>	<b>PROJECTS INCLUDED IN DRAFT REGIONAL PLAN MARKED AS "BY 2035"</b>
Beardsley St & Harbor Dr: Modification of raised median to restrict EB and SB left turns.	Project# 34: Harbor Dr Multimodal Corridor Improvements
CERP Measure: Prioritize implementation of Blue line trolley grade separation at 28th St and 32nd St (SANDAG MMAS project L-83, & HDMCS project 62 & project 22)	Project #13: Blue Line Improvements

