



August 8, 2023

San Diego Association of Governments

401 B Street, Suite 800

San Diego, CA 92101

RegionalPlanAmendment@sandag.org

Re: 2021 Regional Plan Amendment

The San Diego County Air Pollution Control District (District) appreciates the opportunity to comment on the 2021 Regional Plan Amendment (Plan). The District understanding of the Plan Amendment is that it consists of the removal of the Road User Charge (RUC) and updated revenue assumptions, but the projects and timelines remain the same as in the original 2021 plan. It is also the understanding of the District that the Conformity determination of the Plan is not changed.

Although the District understands the need to re-evaluate the RUC, it is unfortunate for the region that it will result in decreased transit boardings (page 10), decreased physical activity for the region's population (page 11), and increased exposure to particulate matter (PM) (page 11), potentially impacting the health of residents. There is an increased need to further reduce PM emissions to the extent possible in anticipation of the Environmental Protection Agency (EPA) review and likely lowering of the primary annual PM_{2.5} standard.

The 2035 regional growth modeling for the amendment shows removal of the RUC will contribute to more driving in the region, which will impact communities, particularly low-income communities in El Cajon and Escondido, with higher levels of particulates compared to the original plan. The increased PM in El Cajon and Escondido is due primarily to road dust from increased freeway driving from the removal of the RUC. These higher exposures translate to increased health risks for residents in those communities, and according to the Plan's Environmental Impact Report are significant and unavoidable, even with the proposed mitigation measures.

While overall emissions of criteria pollutants like reactive organic gases and nitrogen oxides (NO_x) are reduced by the Plan, the emission reductions in the amendment are not as large as the original plan in the near term (increased daily emissions of NO_x between 0.1- 0.3 tons per day between 2023-2026). These increases will contribute to ozone generation in the region (4.1 Air Quality Analysis Table 4.1-1)). These impacts do not rise to the level of significance for the regional analysis, but any increase in pollutants makes it more difficult to meet the region's air quality goals. The San Diego Region is currently non-attainment for both the 2008 and 2015 National Ambient Air Quality Standards (NAAQS). In our 2020



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Control District**

Plan¹ to meet the NAAQS the San Diego region was reclassified to severe non-attainment for both the 2008 and 2015 standards because of our inability to attain the standards in accordance with the requirements of the previous classifications. These reclassifications to severe non-attainment require the San Diego Region to meet the 2008 standard by 2027 and the 2015 standard by 2033. The increase in short term NOX will make achieving these goals more difficult.

Although the District acknowledges implementation of a RUC has generated equity concerns on the fairness of road pricing, we encourage SANDAG to continue evaluating alternatives through careful planning, phased implementation and ongoing public outreach to achieve emission reductions. We welcome the opportunity to continue working with SANDAG and other member agencies on this Plan and upcoming efforts to create a 2025 Plan that is making our transportation system faster, more equitable, and protective of air quality and the health of residents in the region.

Should you have any questions about these comments please contact Eric Luther, (858) 586-2893 or eric.luther@sdapcd.org.

Sincerely,

Eric Luther

Eric Luther

Supervising Air Resources Specialist

¹ <https://www.sdapcd.org/content/sdapcd/planning.html>