

May 29, 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). By a vote of 20-0, with one abstention, at the May 26, 2020 Portside Steering Committee Meeting, the CSC agreed to send this communication as a formal request for consideration. Although the committee has made tremendous progress in the short time that it launched the CERP effort and it is working well together, 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. We collectively applaud the APCD's vision, leadership, and efforts. However, the multiple challenges outlined below require a response from CARB for how it will ensure that the development timeline of this CERP is fair.

Challenge #1 – 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 resulted in further reductions in APCD staff capacity for the CERP.

Challenge #2 – 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 affecting community residents disproportionately due to the effects of income insecurity, housing stability, and individual family health and well-being ranking high as priorities.

Challenge #3 – Compressed timeline. Currently, the CERP schedule necessitates a draft CERP by August 2020 in order to move forward for APCB and CARB approvals. With a complete loss of approximately 45 days due to COVID-19 and the 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.

Challenge #4 – The San Diego APCD will have two important vacancies for the leading roles of the Portside CERP due to APCD staff transitions. One occurred in January at the outset of the CERP planning phase; the CSC has also learned that there will be an APCD chief transition in June. These adjustments create additional stress on staffing levels for the current responsibilities of the APCD and the development of the CERP. Filling these positions will also take months because of the fact that the APCD human resources is within the San Diego County Government.

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 urge an additional 6-month be allowed for the benefit of the many residents of the San Diego Portside Communities.

Respectfully,

The San Diego Portside Steering Committee

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