



October 22, 2021

Supervisor Nora Vargas  
Chair, San Diego APCD Governing Board  
County Administration Building  
1600 Pacific Highway  
San Diego, CA 92101

**SENT VIA EMAIL**

Re: Final Comments regarding the Proposed amendments to Rule 1210 – Toxic Air Contaminant Public Health Risks-Public Notification and Risk Reduction, Version October 2021

Dear Chair Vargas,

Thank you for the opportunity to provide comments to the District's Final Draft of Proposed Amendments to Rule 1210. This letter supersedes our letter of August 13, 2021, which raised a number of issues regarding the August 5, 2021, version of Draft amendments to Rule 1210.

IEA would like to acknowledge APCD staff for their availability over the past several months to meet and discuss our member's concerns regarding this complex and important rule. We also appreciate the challenges faced by APCD in their efforts to reduce risk in the community without causing unnecessary job loss or unintended economic consequences.

In due course, APCD staff responded to every issue raised in our August 13 letter. Having now reviewed the revised draft (October 2021), we appreciate the clarifications provided by the District, especially that staff will continue to monitor and update risk levels against changing land use conditions around businesses, as well as regulatory and legislative changes and any scientific updates regarding emissions and sources from CARB and other agencies. Therefore, IEA removes its opposition to the proposed Rule 1210.

IEA would also like to express our appreciation for the completion of a Socioeconomic Impact Assessment (SIA) to assess the local impacts of this proposed Rule. For the members of the Governing Board, we would like to draw your attention to Tables 6 and 7 (page 21) which predict a loss of 61 jobs annually over the next 10 years. A third of

those jobs are expected to occur in the shipbuilding and repair sector, and it is important to consider that a significant percentage of shipbuilding and repair jobs belong to residents of the Portside Community.

All IEA members and their 55,000 employees residing in San Diego County appreciate APCD's contribution to preserving our quality of life in this region, and breathing clean air is a critical part of that. Should you have any questions, please feel free to contact me. In the meantime, thank you for your consideration.

Best regards,

A handwritten signature in black ink that reads "Jack Monger". The signature is fluid and cursive, with the first name "Jack" being more prominent than the last name "Monger".

Jack Monger  
CEO

cc: All Governing Board members  
Paula Forbis, APCO  
Mahiany Luther, APCD  
Mohsen Nazemi, APCD  
David Flores, Office of Supervisor Vargas