



June 6, 2024

City of National City  
Attn: David Welch, Associate Planner – Planning Department  
1243 National City Boulevard, National City, CA 91950  
[dwelch@nationalcityca.gov](mailto:dwelch@nationalcityca.gov)

Re: San Diego Clean Fuels Facility LLC Project

Dear Mr. Welch,

The San Diego County Air Pollution Control District (APCD) appreciates the opportunity to provide comments on the San Diego Clean Fuels Terminal LLC Project, and scoping meeting held on May 23, 2024, at the National City Public Library. The APCD would like to reiterate our previously submitted comments<sup>1</sup> regarding potentially significant air quality impacts.

### **General Comment on Project Location**

The project is proposed to be located in the Portside Environmental Justice Community (Portside Community), which was selected as an Environmental Justice community under the California Air Resources Board (CARB) Community Air Protection Program (Program) (established in response to Assembly Bill 617 [C. Garcia, Chapter 16, Statutes of 2017]). The Program requires new community-focused and community-driven actions to reduce air pollution and improve public health in communities that experience disproportionate burdens from exposure to air pollutants. The Program's mission is to reduce pollution exposure in communities based on environmental, health and socioeconomic information, and it establishes new strategies to improve air quality in California environmental justice communities.

The Portside Community includes the neighborhoods of Barrio Logan, Logan Heights, and Sherman Heights in the City of San Diego, and West National City within National City. The Portside Community was selected under the Program since it includes twelve (12) census tracts with some of the highest CalEnviroScreen 4.0 (CES 4.0) ratings in California. Specifically, four (4) census tracts are in the 90<sup>th</sup> percentile for CES 4.0 and seven (7) within National City are in the 80<sup>th</sup> percentile for CES 4.0., with the project site registering in the 97<sup>th</sup> percentile of pollution burden communities across California. This environmentally burdened and vulnerable community has over 56,000 residents.

The CERP, adopted by the APCD and CARB, includes several emission reduction strategies for mobile sources of air pollution (which include diesel trucks) as they are the driver for diesel particulate matter (DPM) emissions, a known carcinogen, in the community. Eleven (11) of the twelve (12) census tracts in the Portside Community (over 45,000 people) have an exposure risk to DPM greater than 80 percent of census tracts statewide (i.e., the 95<sup>th</sup> percentile) according to CES 4.0. Four (4) of the census tracts (over 15,000 people) are in the 95<sup>th</sup> percentile for DPM. In addition to these environmental burdens, residents

---

<sup>1</sup>[https://www.sdapcd.org/content/dam/sdapcd/documents/grants/planning/ceqa\\_comment\\_letters\\_2023/APCD\\_Comments\\_SD\\_Clean\\_Fuels.pdf](https://www.sdapcd.org/content/dam/sdapcd/documents/grants/planning/ceqa_comment_letters_2023/APCD_Comments_SD_Clean_Fuels.pdf)



of the Portside Community also face significant health and socioeconomic challenges. CalEnviroScreen scores for the asthma indicator show five census tracts (20,000 residents) in the 90<sup>th</sup>+ percentile. With the high asthma indicator and significant pollution exposure, residents that suffer from asthma are especially vulnerable to the health effects of air pollution.

For these reasons, the APCD recommends the analysis also consider other project locations outside of the region's Environmental Justice designated communities.

## **Emission Reduction Strategies**

### Transfer Point Facility

In an effort to minimize operational emissions we recommend considering an enclosed facility with exhaust treatment systems around the fuel transfer points, to minimize exposure and risk to the surrounding community due to potential fugitive emissions.

### Zero Emissions Technologies

As noted in the Initial Study (Section 4.6.2), this project conservatively estimates 138 daily heavy-duty truck trips, in addition to the transporting of materials during the construction phase of this project. As business and activities increase within and around the Portside community significant environmental impacts could be greater without concerted action. The California Air Resources Board and APCD have taken many actions to reduce truck pollution through regulation, enforcement, and incentive programs.

At minimum projects within National City should remain consistent with the Portside Community Emissions Reduction Plan<sup>2</sup>. Specific to the CERP, the APCD asks the project proponents consider deployment of zero emission vehicle (ZEV) heavy duty trucks, as outlined in the Heavy-Duty Truck Strategy sections noted below.

1. Action E1: Advance the deployment of heavy-duty on-road electric trucks to demonstrate operational feasibility and reduce emissions within the Portside Community and other disadvantaged communities.
2. Action E3: Support dedicated truck route and avoid truck impacts to local community.

Additionally, the project will involve operational emissions from on-site diesel equipment, specifically from locomotive and switching engines. The APCD notes that this type of equipment is likely a good candidate to consider for emission reductions because the project proponent has more direct control over what equipment is used, and there are known emission reducing technologies for this equipment. We recommend considering adding zero emission locomotives and switching engines.

---

<sup>2</sup> <https://www.sdapcd.org/content/dam/sdapcd/documents/capp/cerp/Portside-Environmental-Justice-CERP-July-2021.pdf>



## General Comment on Odors

Reference of odor complaints in the Initial Study in Section 4.3.5 indicate a less than significant impact, with no additional analysis during the EIR process. The primary risk exposure cited, is due to diesel exhaust in the immediate vicinity from both truck and locomotive activity, as well as offensive odors associated transloading of biodiesel, sustainable aviation fuel and ethanol containing additives—and particularly when these fuels combust. Combustion and accidental leaks have occurred within the Portside Community, and as such is a primary concern for the residents in the area. It is important to emphasize, as already noted in the Portside CERP, nearly 40% of air quality complaints are due to odor emissions within the anticipated project area. The number of complaints from the Portside Community has been increasing since the adoption of AB 617 in July 2017, doubling from 4 percent of countywide complaints to 8 percent.

The APCD takes complaint investigations seriously and prioritizes these investigations and recommends the EIR seriously consider odor emissions. It should be noted that APCD has enhanced its outreach and investigative efforts to further serve the Portside Community and is committed to continuing to expand and evolve its enforcement program.

For your consideration, we are including a link to The District's [Nuisance Complaint Program](#), along with references to [APCD's Rules & Regulations](#) page. In addition to SDAPCD rules cited in the Initial Study, Section 4.3.4.1, we recommend the project team to review the following rules during the EIR process.

- Rule 51. Nuisance
- Rule 54. Dust & Fumes
- Rule 61.2. Transfer of Organic Compounds into Mobile Transport Tanks
- Rule 1200(b)(2). Exemptions to Exemptions for Toxic Air Contaminates

Should you have any questions about these comments or APCD requirements please contact Supervising Air Resources Specialist, Eric Luther (858) 586-2893 or [eric.luther@sdapcd.org](mailto:eric.luther@sdapcd.org).

Sincerely,

*Eric Luther*

Eric Luther  
Supervising Air Resources Specialist