



January X, 2025

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Re: USDG Fuels Terminal Facility Project

Dear Mayor Morrison and Councilmembers:

On behalf of the individuals and organizations signed onto this letter, the Environmental Health Coalition (EHC) urges you to reject approval of the USDG Fuels project proposal that calls for the development and operation of a fuel transfer facility on the 830 West 18<sup>th</sup> Street property in West National City.

### **USDG is Bad for Residents' Lungs**

USDG's project will concentrate Diesel Particulate Matter (DPM) emissions from over 2100 additional truck trips in West National City each month, where residents breathe more polluted air than 91% of the state.<sup>1</sup> Diesel emissions are responsible for 85 percent of the cancer risk associated with air pollution in Barrio Logan and National City.<sup>2</sup> DPM contributes to other adverse health outcomes including premature death, hospitalizations, and emergency department visits for heart and lung disease, asthma, increased respiratory symptoms, and decreased lung function in children.

At maximum capacity, USDG's activities would add up to 72 more heavy-duty daily truck trips in National City.<sup>3</sup> The fuel transfer facility would transfer 13,800 barrels of fuel per day or 402 gallons per minute – less than 600 feet from residential homes, and within 0.3 miles of Kimball Elementary School and St Anthony Padua church.<sup>4</sup> Children in National City already experience 1.5 times more emergency room visits for asthma than the county average and the introduction of more heavy-duty trucks into the neighborhood will only worsen an already dangerous situation.<sup>5</sup>

### **USDG Fuels jeopardizes the CERP and National City's Health and EJ Goals**

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<sup>1</sup> Census Tract 6073021900 ranks higher than **91%** of the census tracts in California for diesel particulate matter pollution.  
[https://experience.arcgis.com/experience/ed5953d89038431dbf4f22ab9abfe40d/page/Indicators/?views=Diesel-Particulate-Matter#data\\_s=id%3AdataSource\\_7-17c3d6dce45-layer-2%3A2672](https://experience.arcgis.com/experience/ed5953d89038431dbf4f22ab9abfe40d/page/Indicators/?views=Diesel-Particulate-Matter#data_s=id%3AdataSource_7-17c3d6dce45-layer-2%3A2672)

<sup>2</sup> [https://www.sdapcd.org/content/dam/sdapcd/documents/capp/meetings/portside-csc/042523/CARB%20Portside%20Toxic%20Modeling\\_OA\\_Final.pdf](https://www.sdapcd.org/content/dam/sdapcd/documents/capp/meetings/portside-csc/042523/CARB%20Portside%20Toxic%20Modeling_OA_Final.pdf)

<sup>3</sup> Page 78. [https://files.ceqanet.opr.ca.gov/299875-2/attachment/xKQpvBR6U7qC4a1tsOf5hqY5WcqZd-E9uT1mLMVZvsOfBU89CWZvo5ejK08xfOba\\_d2cXI47pUzC6wPX0](https://files.ceqanet.opr.ca.gov/299875-2/attachment/xKQpvBR6U7qC4a1tsOf5hqY5WcqZd-E9uT1mLMVZvsOfBU89CWZvo5ejK08xfOba_d2cXI47pUzC6wPX0)

<sup>4</sup> Page 77. [https://files.ceqanet.opr.ca.gov/299875-2/attachment/xKQpvBR6U7qC4a1tsOf5hqY5WcqZd-E9uT1mLMVZvsOfBU89CWZvo5ejK08xfOba\\_d2cXI47pUzC6wPX0](https://files.ceqanet.opr.ca.gov/299875-2/attachment/xKQpvBR6U7qC4a1tsOf5hqY5WcqZd-E9uT1mLMVZvsOfBU89CWZvo5ejK08xfOba_d2cXI47pUzC6wPX0)

<sup>5</sup> Data Source: California's Department of Health Care Access and Information (HCAI) 2022 Patient Discharge and Emergency Department Databases

In addition to these very real health risks, USDG's Fuel Transfer Facility puts at risk years of policy work and clean air progress in the Portside EJ community. In response to Assembly Bill (AB) 617 (C. Garcia, 2017), the California Air Resources Board (CARB) established the Community Air Protection Program (Program). The Program's mission is to reduce pollution exposure in communities based on environmental, health and socioeconomic information. In 2018 the Portside Community was selected as a monitoring community and in 2019 was selected to develop a Community Emissions Reduction Plan (CERP). Since 2018, the Air District has been working with the Portside Steering Committee made up of local businesses, community groups, and residents to develop strategies to improve the air quality for all. As a part of the CERP, the Portside community steering committee advanced a commitment to reduce Diesel Particulate Matter from 2018 levels by 80% in ambient air at all Portside Community locations by 2031. The USDG fuels project will add more diesel pollution to an already heavily burdened community and would reverse years of clean air progress in the community. Additionally, National City was one of the first cities to adopt a Health and Environmental Justice Element in their General Plan. USDG Fuels not only jeopardizes the goals outlined in the Health and EJ Element, but it goes against multiple policies implemented to protect residents of the Westside.

### **USDG Fuels is Bad for the Environment**

Medium and heavy-duty trucks alone make up only 1% of all vehicles in San Diego County but emit 13% of all diesel particulate matter (DPM), a major component of fine particulate matter (PM) in the region, which contributes to lung cancer and aggravates asthma.<sup>6</sup> Moreover, medium and heavy-duty trucks emit 15% of all oxides of nitrogen (NOx), which is a precursor to regional Ozone and particulate pollution and contributes to respiratory and other illnesses.<sup>7</sup> San Diego County does not yet meet the federal or State ozone standards or the State fine PM standard and must further reduce air pollution to reach attainment. Tractors and other construction equipment during the grading and site prep phases of the project will undoubtedly result in an increase in DPM levels in the Portside as well. This project plan doesn't mention any use of any ZEV trucks for delivery of fuel to retailers which goes against the community expectation document voted on by the CSC in late 2024.

In addition to the diesel trucks that will be transporting fuels from the transfer facility – the types of fuels they will be transporting are not good for the environment. The fuel facility will be transporting diesel fuel, a combination of renewable diesel fuel and up to 20-percent bio-diesel fuel, ethanol, and aviation fuel. All of which (at varying degrees) contribute to global warming. It is no secret that California is leading the country in transitioning to a cleaner/greener future. Recent legislation like the Advanced Clean Fleets (ACF) rule signal towards a future where the transportation sector in CA is fully transitioned to zero emission technologies by 2045.<sup>8</sup> Despite this clear trend, USDG Fuels continues to prop up biofuels as a fuel source to power our transportation sector.

The USDG Fuel transfer facility is dangerous and poses a serious threat to the goal of clean air in one of San Diego's most pollution burdened neighborhoods. We ask National City leadership to take a stance for community health, preserve community efforts of the CERP, defend the integrity of the city's Health and Environmental Justice Element, and reject the USDG Fuels project proposal.

Thank you for your time,

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<sup>6</sup> Page 2. <https://www.sdapcd.org/content/dam/sdapcd/documents/rules/rule-workshops/060823/ISR-Framework-English.pdf>

<sup>7</sup> Page 2. <https://www.sdapcd.org/content/dam/sdapcd/documents/rules/rule-workshops/060823/ISR-Framework-English.pdf>

<sup>8</sup> <https://ww2.arb.ca.gov/resources/documents/zero-emission-road-medium-and-heavy-duty-strategies>