



# San Diego County Air Pollution Control District

December 12, 2022

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**Chairman Dan Malcolm**  
**Port of San Diego**  
3165 Pacific Highway  
San Diego, CA 92101

Dear Chairman Malcolm,

The San Diego County Air Pollution Control District (SDAPCD) would like to express its concerns with the Mitsubishi Cement Corporation (MCC) proposed bulk cement warehouse facility at the Tenth Avenue Marine Terminal. While we understand the proposal will not be heard at the December 13, 2022, Board of Port Commissioners meeting, we would like to provide input in the event the project is brought to your board for consideration in the near future.

MCC proposes to construct and operate a cement import, storage, and distribution facility at Warehouse C. The proposed project would distribute up to 600,000 metric tons of cement annually and generate approximately 24,000 heavy-duty truck trips per year, adding to the approximately 38,000 heavy-duty diesel truck trips per year currently servicing the marine terminal. The SDAPCD is concerned with the project's potential impacts to the surrounding community, which is already disproportionately burdened by multiple pollution sources and is home to some of the most vulnerable neighborhoods in California as analyzed by the California Communities Environmental Health Screening Tool Version 4.0 (CalEnviroScreen). The neighborhoods of Barrio Logan, Logan Heights, Sherman Heights, and west National City were selected by the California Air Resources Board (CARB) for the development of a Community Emissions Reduction Program (CERP) as a disadvantaged community under Assembly Bill 617 (Statutes of 2017). Most (84%) of the cancer risk from air pollution in the Portside Community is due to diesel particulate matter (DPM), therefore reducing DPM emissions is key to improving public health in this community.

The SDAPCD worked with a Community Steering Committee, including representatives from the Port of San Diego, to develop the Portside Community CERP, which was adopted by the SDAPCD Board and CARB in 2021. The CERP identifies goals and strategies to achieve air pollutant emissions and exposure reductions throughout the Portside Community, including an 80% reduction in ambient DPM levels by 2030 and a 100% reduction in DPM emissions from medium and heavy-duty trucks servicing the Port five years in advance of regulatory requirements. These goals are supportive of the Port's 2021 Maritime Clean Air Strategy (MCAS), which calls for 40% of the Port's annual cargo truck trips being performed by zero-emission trucks by 2026 and 100% by 2030.

Absent clear commitments from MCC to zero-emission trucks at the levels specified in the CERP and MCAS, project-related increases in diesel truck trips would be inconsistent with the Portside Community CERP and the MCAS and would hinder progress toward the CERP's health-based targets set by the Steering Committee, the SDAPCD, and CARB. We thus urge the Port to consider consistency with the CERP and MCAS in any decisions on the proposed project.

Additionally, as your Board considers this project and related documents for approval, SDAPCD believes it is imperative to allow sufficient time for community members and agencies to review project documents on such an impactful project. We thus recommend that the Port and MCC continue to engage with the Portside Community Steering Committee as more details of the project are developed to help the community understand the impacts of the project and consider their concerns with sufficient time in advance of any action by your Board.

We appreciate your partnership as we work together to reduce air pollutant emissions and health risks in our most vulnerable neighborhoods. Should you have any questions, please feel free to contact me at (858) 586-2706.

Respectfully,

Paula Forbis  
Air Pollution Control Officer