



March 16, 2026

San Diego Unified Port District
P.O. Box 120488
San Diego, CA 92112-0488
Attn: Peter Eichar, Principal Planner.
Climate and Sustainability Department

SUBJECT: Tidelands Avenue Electric Truck Hub Project Draft EIR

Dear Mr. Eichar:

The San Diego County Air Pollution Control District (SDAPCD) appreciates the opportunity to provide comments on the Tidelands Avenue Electric Truck Hub Project (project) Draft Environmental Impact Report (EIR). The project is located at 1640 Tidelands Avenue, National City, California, located in the Portside Environmental Justice Community (Portside Community). This community – which includes Barrio Logan, Logan Heights, Sherman Heights, and West National City – was identified by the California Air Resources Board (CARB) and the SDAPCD under Assembly Bill 617 (AB 617, also known as the Community Air Protection Program or CAPP) as an overburdened area for air pollution exposure and related health issues.

The proposed project includes zero-emissions truck charging and parking stalls; a photovoltaic canopy, a battery energy storage system (BESS), a convenience store, and infrastructure improvements. The project would serve electric trucks that frequently visit and serve the nearby marine terminals and other related storage facilities, encouraging the use of Zero Emission Vehicle (ZEV) trucks, which advances the deployment of ZEV heavy-duty trucks to reduce emissions in disadvantaged communities. The Portside Community Steering Committee¹, as participants in the CAPP, developed a Community Emissions Reduction Program (CERP) that outlines specific emission-reduction goals and strategies to improve local air quality.² One key goal is to reduce diesel particulate matter (Diesel PM) from 2018 levels by 80 percent by 2031 in ambient air across all Portside community locations, as well as to establish zero-emission medium- and heavy-duty truck charging infrastructure within the Portside area. The proposed project, once completed, has the potential to support progress toward these community-identified goals. However, some elements of the project, if not properly addressed during development and implementation, may result in additional impacts on surrounding communities.

The SDAPCD is providing the following comments for your consideration

- Toxic Air Contaminant (TAC) Emissions: The project includes the potential use of a 891 horsepower (hp) diesel generator for up to 10 hours per day during the start of operations, but prior to the installation of the onsite solar generating facilities, the BESS, and the equipment to use electricity from the electrical grid.

The SDAPCD's permitting program has been established to minimize air pollution by specifying operating and compliance requirements for stationary and portable sources that emit air contaminants. SDAPCD [Rule 10](#) requires that any person building, erecting, altering or replacing any article, machine, equipment or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate or reduce or control the issuance of air contaminants,

¹ The Portside Community Steering Committee is comprised of community residents, industry representatives, academia, public health representatives, local jurisdictions, and transportation and planning agencies.

² [Portside Community Emissions Reduction Program](#)

shall first obtain written authorization for such construction and operation from the SDAPCD. Examples of air contaminants include, but are not limited to, carbon monoxide, lead, nitrogen dioxide, ozone, particulate matter, sulfur dioxide or toxic air contaminants, which can negatively impact public health. SDAPCD [Rule 11](#) lists exemptions for equipment or processes that do not emit a significant amounts of air pollutants.

- The diesel generator would be subject to SDAPCD Regulation XII: Toxic Air Contaminants; Rule 1200: Toxic Air Contaminants New Source Review. The rule requires new or modified stationary source units with the potential to emit TACs above rule threshold levels to demonstrate that they will not increase the maximum incremental cancer risk above 1 in 1 million at every receptor location.
- The diesel generator is a source of diesel particulate matter, which has been calculated as part of the Draft EIR. However, health risk calculations were not included as part of the Draft EIR. For completeness and to provide substantial evidence, we would recommend that health risk calculations be included in the Final EIR, especially since the proposed project is located adjacent to an Environmental Justice community. Health risk calculations should be based on the latest Office of Environmental Health Hazard Assessment's (OEHHA) guidance. This analysis should be included as part of the project as well as part of the cumulative project impacts.
- TAC Emission Thresholds (page 3.1-22): The SDAPCD notes the selection of a ten in one million significance threshold for cancer risk. However, please note that SDAPCD Rule 1200 allows for a maximum increased cancer risk of one in one million for stationary sources, unless the project implements Toxics Best Available Control Technology (T-BACT). For this reason, the appropriate significance threshold for cancer risk should be one-in-one-million, as established by Rule 1200.
- While construction emissions will not exceed the significance thresholds, the SDAPCD strongly recommends implementation of zero emission equipment wherever feasible and the use of cleanest available combustion off-road equipment (Tier 4 Final) whenever zero emissions equipment is not feasible to minimize emissions from project construction activities to the maximum extent practicable. At a minimum, projects within National City should remain consistent with the Portside Community Emissions Reduction Plan.
- Chapter 6, Alternatives: Alternative 2 would eliminate the use of the interim diesel generator during the initial operational phase and instead rely solely on the photovoltaic arrays, BESS and utility grid connection from the outset of the project. This alternative would eliminate the emissions associated with an interim diesel generator use and better align with the project's sustainability objectives and the Port's Maritime Clean Air Strategy (MCAS) by avoiding on-site diesel combustion-based energy sources entirely. This is the environmentally superior alternative and the preferable alternative to the SDAPCD to further minimize TAC emissions and their related health effects to environmental justice communities.

Asbestos Renovation or Demolition

Asbestos is a known human carcinogen and the primary route of exposure is through inhalation of asbestos fibers. More information on the health effects of asbestos may be found at www.epa.gov/asbestos . As such, SDAPCD [Rule 1206](#) incorporates the requirements of the federal asbestos requirements found in National Emission Standards for Hazardous Air Pollutants (NESHAP) and includes additional requirements to minimize exposure to asbestos fibers.

SDAPCD [Rule 1206](#) requires a facility survey for certain projects to determine if asbestos is present prior to commencement of renovation or demolition. Persons conducting facility surveys shall have taken and passed a current EPA-approved Building Inspector Course. The asbestos content shall be analyzed by a laboratory certified by the National Voluntary Laboratory Accreditation Program (NVLAP).

If more than 100 square feet of asbestos containing materials will be disturbed or a demolition will occur a notification must be submitted to the SDAPCD and procedures for asbestos emission control and waste handling and disposal must be in compliance with SDAPCD Rule 1206.

Dust

Projects or operations that can generate fugitive dust emissions may be subject to the following SDAPCD rules:

- SDAPCD [Rule 50](#), *Visible Emissions*, which states air contaminants shall not be discharged into the atmosphere for a period or periods aggregating more than three minutes in any period of 60 consecutive minutes which is darker in shade than a number 1 on the Ringelmann Chart (20% opacity).
- SDAPCD [Rule 51](#), *Nuisance*, which states “*a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health or safety of any such persons or the public or which cause or have a natural tendency to cause injury or damage to business or property*”

In addition to the rules listed above, any commercial construction or demolition activity capable of generating fugitive dust emissions may be subject to SDAPCD [Rule 55](#), *Fugitive Dust Control*. This rule has restrictions for airborne dust beyond the property line and visible roadway dust as a result of active operations, spillage from transport trucks, erosion, or track-out/carry-out.

While the proposed project has environmental benefits, it is important to protect the years of work to reduce emissions and to prevent exacerbating existing pollution burdens in a community already facing disproportionate health and environmental impacts. As such we encourage the ongoing maintenance of the ZEV charging stations beyond the 20-year lease period. The proposed decommissioning of ZEV infrastructure could impede furthering progress toward regional emission reduction strategies, and reducing the pollution burden for portside communities.

We appreciate your consideration.

Sincerely



Eric Luther
Supervising Air Resources Specialist