



# San Diego County Air Pollution Control District

October 7, 2025

City of National City  
Attn: Mayor and City Council Members  
1243 National City Boulevard  
National City, CA 91950

**Subject:** Consideration of Air Quality Impacts in Overburdened Communities and Portside CERP Goals –  
*San Diego Clean Fuels Terminal LLC Project*

Dear Mayor and City Council Members,

We appreciate the opportunity to provide comments on the consideration of the San Diego Clean Fuels Terminal LLC Project (Project) proposed within West National City, 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 San Diego County Air Pollution Control District (SDAPCD) under Assembly Bill 617 (AB 617) as one of California's most overburdened areas for air pollution exposure and related health impacts.

In 2018, the Portside Community was selected by CARB and SDAPCD as a community air monitoring area, and in 2019, it was designated for the development of a Community Emissions Reduction Program (CERP)—a community-driven roadmap to reduce diesel particulate matter (DPM) and other toxic air pollutants. Adopted by SDAPCD and CARB in 2021, the CERP outlines targeted strategies to protect public health and improve air quality in this vulnerable region.<sup>1</sup> The CERP 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 95 percent of census tracts statewide (i.e., the 95th percentile) according to CalEnviroScreen. Four (4) of the census tracts (over 15,000 people) are in the 99th percentile for DPM. In addition to these environmental burdens, residents of the Portside Community also face significant health and socioeconomic challenges.

As you consider the proposed Project, we urge you to consider the goals and strategies identified in the Portside CERP to help reduce diesel emissions in the Portside Community. Specifically, the Portside CERP calls for aggressive emission reductions from diesel sources through Action E1, which advances the deployment of zero-emission (ZEV) heavy-duty trucks to reduce emissions in disadvantaged communities. Additionally, CERP Goal 1 calls to reduce diesel particulate matter by 80% by 2031. Other CERP actions call for reducing community exposure to pollution, such as supporting a dedicated truck route and avoid truck impacts to local community (Action E3), reducing exposure for sensitive receptors within 500ft of Port, freeway, and industries (Action F2), and reducing exposure for public schools (Action F4).

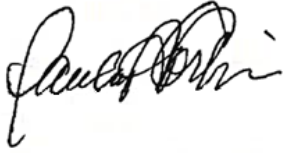
As the Portside Community continues to make progress in implementing the CERP, it is important to protect the years of work to reduce emissions and to prevent exacerbating existing pollution burdens in a

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<sup>1</sup> [Portside Community Emissions Reduction Program](#)

community already facing disproportionate health and environmental impacts. We ask that you carefully consider and address any potential impacts from this Project that would conflict with the CERP goals.

Sincerely,

A handwritten signature in black ink, appearing to read "Paula Forbis", is positioned above the typed name.

Paula Forbis  
Air Pollution Control Officer  
San Diego County Air Pollution Control District

***Further References***

- SDAPCD USDG Fuels Project [Comment Letter 6.28.23](#)
- SDAPCD USDG Fuels Project [Comment Letter 6.06.24](#)
- SDAPCD USDG Fuels Project [Comment Letter 01.23.25](#)
- CARB USDG Fuels Project [Comment Letter 7.20.23](#)
- CARB USDG Fuels Project [Comment Letter 6.07.24](#)
- [Portside Community Emissions Reduction Program](#)
- [Portside Project and Lease Expectations](#)