CALIFORNIA
AIR RESOURCES BOARD

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Sent via email

Dear Peter Eichar:

Thank you for providing the California Air Resources Board (CARB) with the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Tidelands Avenue Electric Truck Hub Project (Project), State Clearinghouse No. 2025060903. The Project is located within the San Diego Unified Port District (Port), which is the lead agency for California Environmental Quality Act (CEQA) purposes.

CARB appreciates the significant investment and opportunity that the Project represents, and the Port's commitment to accelerating the transition from diesel-powered heavy-duty trucks to zero-emission electric trucks. The addition of electric truck charging infrastructure in an area burdened by diesel pollution is particularly noteworthy; this project has the potential to play a meaningful role in improving California's air quality. Although the Project will promote the use of zero-emission electric trucks, CARB is concerned that the construction of the Project could contribute to cumulative air quality impacts in the nearby Portside Community, which has been identified as a community overburdened with air pollution under Assembly Bill 617 (AB 617) (C. Garcia, Chapter 136, Statutes of 2017).[1] Residences within the Portside Community are located east of the Project site, with the closest residence located approximately 1,300 feet east of the Project site. In addition to residences, Kimball Elementary School, John A. Otis Elementary School, and National City Middle School are all located within a mile of the Project site. The Portside community is surrounded by existing toxic diesel particulate matter (diesel PM) emission sources, which include many industrial uses, Port equipment emissions, rail traffic along existing rail lines, and vehicular traffic along Interstate 5.

California has committed to address cumulative air quality impacts in communities already facing high pollution burdens, such as the one surrounding the Project, and has adopted legislation to achieve this commitment. AB 617 was signed into law in 2017, and CARB

[1] Assembly Bill 617, Garcia, C., Chapter 136, Statutes of 2017, modified the California Health and Safety Code, amending § 40920.6, § 42400, and § 42402, and adding § 39607.1, § 40920.8, § 42411, § 42705.5, and § 44391.2.

established the Community Air Protection Program to translate AB 617 into action. AB 617 (beginning in 2017), along with additional legislation, AB 197 in 2016, and AB 1749 (beginning in in 2022), requires CARB and air districts to develop and implement emissions reporting and monitoring, and to create plans to reduce exposures and emissions in the communities that are the most impacted by poor air quality – these plans are known as Community Emission Reduction Programs (CERPs).

CARB approved the Portside Community CERP in July 2021, which describes strategies to achieve emission and exposure reductions throughout this community, including significantly reducing or eliminating emissions from heavy-duty mobile sources and industrial stationary sources, with strategies aimed at reducing emissions from marine vessels, trucks, and rail activities associated with the Ports. While the operation of an electric truck hub as proposed under the Project will help the Portside Community achieve many of the goals listed in the CERP, CARB remains concerned that the construction of the Project could pose significant health risk impacts to the Portside Community. To this end, CARB urges the Port to:

- Not rely on modeling defaults when evaluating the Project construction air quality impacts,
- Prepare a health risk assessment (HRA) in the Final Environmental Impact Report (FEIR) evaluating the Project's potential health risk impacts during its construction, and
- Participate in CARB's Clean Construction California (CCC) program.

Project Description

The Project proposes redeveloping an approximately 4.8-acre portion of an existing paved site at 1640 Tidelands Avenue in National City into a dedicated electric truck charging hub. The site is currently used for overflow roll-on/roll-off yard and chassis storage and would be repurposed to support zero-emission goods movement serving nearby marine cargo terminals. The electric truck hub would include 70 electric truck charging stalls, photovoltaic canopy structures, a battery energy storage system, and a small convenience store. The Project also proposes a Trucking-as-a-Service program (TaaS) to support fleet operators in transitioning to electric vehicles. According to the DEIR, up to 30 trucks are anticipated to use the site during the initial operating year as part of the TaaS program, a service where a standard monthly fee is charged and in return the truck operator gets a fully charged and maintained truck to go to work. Once fully built out, the Project would result in 672 daily vehicle trips along local roadways, including 525 electric trucks. The DEIR concludes that construction and operation of the project would result in less-than-significant environmental impacts, with no mitigation measures required.

Unsupported Reliance on CalEEMod Defaults for Construction Air Quality Analysis

The Project's construction air quality analysis relies on a construction phasing schedule and equipment assumptions that do not appear to be supported by substantial evidence in the DEIR. Chapter 3.1 (Air Quality) of the DEIR states that the number and type of off-road construction equipment and heavy-duty truck trips were based on default assumptions from the California Emissions Estimator Model (CalEEMod).[2,3] The DEIR assumes construction would occur over a 10-month period and include trenching, building construction, paving, and architectural coating phases, which were identified by the project applicant.[4] However, the DEIR does not include Project-specific documentation showing that the CalEEMod default equipment mixes, truck trips, or the provided construction phasing schedule accurately reflects how construction of the Project would occur. CalEEMod default equipment and truck trip assumptions are based on generalized construction scenarios and may not represent the specific conditions of an individual project site. Reliance on these defaults without supporting information can result in emissions estimates that do not reflect actual construction activities. CARB therefore recommends that the Port revise the construction air quality analysis in the FEIR to include a construction schedule and list of off-road equipment provide with substantial evidence or provide documentation demonstrating that the CalEEMod default assumptions used in the analysis are conservative and appropriate for the Project.

The Port Does Not Fully Evaluate Construction-Related Cancer Risk Impacts

The Port does not fully evaluate the Project's potential construction-related health risk impact on the nearby Portside Community in the DEIR. In Chapter 3.1 (Air Quality) of the DEIR, the Port concludes that construction would not result in a significant impact from toxic air contaminants (TAC) to nearby sensitive receptors.[5] This conclusion is based on the assertion that construction activities would be temporary and that the nearest residences are

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[2] San Diego Unified Port District. Tidelands Avenue Electric Truck Hub Project Draft Environmental Impact Report. January 2026. Page 3.1-19. Accessible at: *https://ceqanet.lci.ca.gov/2025060903/2/Attachment/f00-VV*

[3] CalEEMod (California Emissions Estimator Model) is a free statewide computer model designed to quantify criteria pollutants and greenhouse gas emissions for land use projects.

[4] San Diego Unified Port District. Tidelands Avenue Electric Truck Hub Project Draft Environmental Impact Report. January 2026. Appendix C. Page 27. Accessible at: *https://ceqanet.lci.ca.gov/2025060903/2/Attachment/jLQsRy*

[5] San Diego Unified Port District. Tidelands Avenue Electric Truck Hub Project Draft Environmental Impact Report. January 2026. Page 3.1-26. Accessible at: *https://ceqanet.lci.ca.gov/2025060903/2/Attachment/f00-VV*

approximately 1,300 feet from the Project site. However, the DEIR does not include an HRA to substantiate this finding.

While the Project's long-term operation would support zero-emission electric trucks and likely not result in operational cancer risk impacts, construction activities will involve the use of diesel-powered off-road equipment and haul trucks which will expose nearby residences to diesel PM, a TAC identified as a carcinogen. Guidance from the California Office of Environmental Health Hazard Assessment (OEHHA) recommends evaluating cancer risk for construction projects lasting longer than 2 months.[6] Because construction of the Project would occur over a 10-month period, beyond that 2-month guideline, a construction HRA is appropriate for the Project. Furthermore, the Project's proximity to the Portside Community supports the need for the preparation of an HRA, as residents could be exposed to diesel PM emissions during construction activities. Without an HRA, the record does not demonstrate that construction-related cancer risks would be less than significant. To this end, CARB urges the Port to prepare a construction HRA and disclose the results in the FEIR.

CARB Urges the Port to Participate in CARB's California Clean Construction Program

The Port concluded in Chapter 3.1 (Air Quality) of the DEIR that the Project's operation and construction would result in a less-than-significant impact on regional air quality. As shown in Tables 3.1-6 (Estimated Maximum Daily Construction Criteria Air Pollutant Emissions) and 3.1-7 (Estimated Maximum Daily Operational Criteria Air Pollutant Emissions) of the DEIR, all air pollutants modeled for Project construction and operation would be below the San Diego County Air Pollution Control District's (SDCAPCD) significance thresholds. Consequently, the Port did not include additional mitigation measures to reduce the Project's construction and operational air pollutant emissions.

Although the Project would not exceed the SDCAPCD's significance thresholds, it should be the Port's goal to reduce the Project's air quality impacts as much as possible. The construction of the Project would temporarily expose nearby residences to harmful air pollution and would contribute to the existing significant air pollution burden in the Portside Community. To reduce these impacts, CARB urges the Port to include a project design measure in the FEIR requiring the Port to participate in CARB's California Clean Construction (CCC) program for the Project.

The CCC program is a voluntary initiative administered by CARB to accelerate the deployment of zero-emission and advanced clean off-road construction equipment across California. The program was developed as part of CARB's broader strategy to meet State Implementation Plan commitments and improve air quality in communities

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[6] California Office of Environmental Health hazard Assessment. Risk Assessment Guidelines. February 2015. Page 8-18. Accessible at:
https://oehha.ca.gov/sites/default/files/media/downloads/crnr/2015guidancemanual.pdf

disproportionately burdened by diesel pollution, such as the Portside Community. The program serves as a voluntary framework that recognizes and encourages fleets to go beyond existing regulations, such as CARB's In-Use Off-Road Diesel-Fueled Fleets Regulation. The program prioritizes the use of battery-electric, hydrogen fuel cells, and other zero-emission construction equipment where those technologies are commercially available, and where not, encourages the use of the cleanest available diesel equipment.

CARB maintains a Zero-Emission Equipment List identifying eligible equipment models, and it provides guidance to awarding bodies on how to integrate clean construction criteria into bid specifications and contract documents.[7] To participate in the CCC program and earn project recognition, if the following equipment types are used in the Project, the Port would be required to use the following zero-emission off-road equipment:

- Aerial lift (scissor and personnel)
- Compact/mini excavator (up to 15,000 pounds operating weight)
- Compact/mini track and wheel loaders (up to 15,000 pounds operating weight)
- Dumper/buggy
- Forklift (up to 5,000 pounds lift capacity)
- Light cart/tower/stand
- Power generation systems, Battery Energy Storage Systems, and hybrid gensets
    - On project diesel generators are only allowed if incorporated into hybrid genset systems (as defined in the program section titled Definitions)
- Tampers/mini-compacters/mini-rollers
- Walk-behind concrete saw

The construction of the Project will likely use many of the off-road equipment listed in the Zero-Emission Equipment List. As presented in Table 3.1-4 (Construction Scenario Assumptions), the Port assumed in their construction emission modeling that the Project construction would require the use of trenchers, tractors/loaders/backhoes, rollers, forklifts, and generator sets, all of which can be provided as zero-emission in the Zero-Emission Equipment List.

In addition to participating in the CCC program, CARB urges the Port to include the following recommended emission reduction strategies as project design features in the DEIR.

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[7] California Clean Construction Program. Accessible at: *California Clean Construction Zero-Emission Equipment List | California Air Resources Board*.

- Ensure the cleanest possible construction practices and equipment are used. This includes eliminating the idling of diesel-powered equipment and providing the necessary infrastructure (e.g., electrical hookups) to support zero and near-zero equipment and tools.
- In construction contracts, include language requiring all off-road diesel-powered equipment used during construction to be equipped with Tier 4 final engines with a diesel particulate filter or cleaner engines, except for specialized construction equipment for which such engines are not available. Information on finding Tier 4 final equipment with diesel particulate filter is available on CARB's website.[8]
- In construction contracts, include language requiring that all off-road equipment with a power rating below 19 kilowatts (e.g., plate compactors, pressure washers) used during project construction be battery-powered.
- In construction contracts, include language that requires all heavy-duty trucks entering the construction site during the grading and building construction phases be model year 2014 or later.

Conclusion

CARB appreciates the Port's leadership in advancing infrastructure that supports the transition to zero-emission freight and recognizes the Project as an important step toward reducing diesel emissions associated with goods movement in the Port. Projects that enable the deployment of zero-emission trucks can play a meaningful role in improving air quality and supporting the goals of the Portside Community CERP. At the same time, ensuring that the Project's construction activities are carefully evaluated and that feasible measures are incorporated to minimize temporary emissions will help ensure that nearby existing residents and schools are protected from additional pollution burdens. CARB therefore encourages the Port to provide additional documentation supporting assumptions used in the Project's construction emissions analysis, prepare a construction HRA, and add a project design feature requiring participation in CARB's CCC program and related emission reduction measures.

Given the breadth and scope of projects subject to CEQA review throughout California that have air quality and greenhouse gas impacts, coupled with CARB's limited staff resources to substantively respond to all issues associated with a project, CARB must prioritize its substantive comments here based on staff time, resources, and its assessment of impacts. CARB's deliberate decision to substantively comment on some issues does not constitute an admission or concession that it substantively agrees with the lead agency's findings and conclusions on any issues for which CARB does not submit substantive comments.

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[8] Optional Tier 4 Final + Diesel Particulate Filter Equipment. Accessible at *Optional Tier 4 Final + Diesel Particulate Filter Equipment* | California Air Resources Board.

CARB appreciates the opportunity to comment on the DEIR for the Project and can provide assistance with emission reduction strategies, as needed. Please include CARB on your list of selected State agencies that will receive the FEIR. If you have questions, please contact Stanley Armstrong, Air Pollution Specialist, via email at *stanley.armstrong@arb.ca.gov*

Sincerely,

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