



August 2, 2023

City of San Diego Planning Commission
City Administration Building, 12th Floor
202 C Street
San Diego, CA 92101

Subject: Homes for All of Us: Housing Action Package 2.0 – SUPPORT WITH AMENDMENTS

Dear City of San Diego Planning Commissioners:

Environmental Health Coalition (EHC) believes that all people and communities have the right to live, work and play in a clean and safe environment regardless of their ZIP code. Environmental Health Coalition has fought to advance environmental justice in San Diego County for over 40 years; however, residents in San Diego’s portside communities continue to be disproportionately impacted by industrial pollution. Industrial operations in the Barrio Logan neighborhood have caused harm to resident’s health and quality of life, which requires meaningful intervention by elected officials and regulatory agencies.

We are generally in support of the Homes for All of Us: Housing Action Package 2.0 (HAP 2.0), which among other things, calls for the phasing out of harmful land uses; and write this letter today to respectfully request that you approve HAP 2.0 with the following amendments:

1. Expand the “harmful use” designation to include Municipal Code Categories prohibited in the “transition zone” of the Barrio Logan Community Plan Update;
2. Expand the “harmful use” designation to include polluting businesses within 1,000 feet from homes (instead of 50 feet), and include all other sensitive receptor locations (e.g., schools, medical facilities, and parks) to conform with California Air Resources Board recommendations; and
3. Cease permitting operations of previously conforming harmful uses after seven (7) years (instead of 15 years) to advance the goals of the Community Emissions Reduction Plan.

BARRIO LOGAN AND THE EFFECTS OF INCOMPATIBLE LAND USES.

The City of San Diego is home to approximately 1.4 million people.¹ The neighborhoods within the City are diverse and have unique histories that influence the zoning landscape. Mayor Todd Gloria’s Office is

¹ <https://www.census.gov/quickfacts/fact/table/sandiegocitycalifornia/PST045222>

currently engaged in efforts to improve overall quality of life for San Diegans, and through the 2022 Strategic Plan, they have identified the importance of using targeted policy to provide air quality improvements and other core benefits in vulnerable communities.²

One San Diego community, Barrio Logan, is especially affected by poor air quality and other health impacts. Barrio Logan is a predominantly Latinx community located along the industrialized portion of the San Diego Bay. Between 1910 and 1920, this area saw a large influx of immigrants from the Mexican revolutionary war. Following this migration, Barrio Logan became one of the largest Mexican-American communities in California and today is seen by many as San Diego's "beating heart of Latin-American and Mexican heritage and culture."³

As San Diego grew, racist zoning laws in the 1950s through the 1970s led to the re-zoning of this residential, low-income community of color, into an industrial area; and approved the construction of two Interstates and a State Soute through the community. A series of junk yards, recycle yards, as well as other industries, including plating, furniture, woodworking, warehouses, auto body, welding shops, began operating next to homes and schools.

Barrio Logan and the Portside communities have become the most pollution-burdened communities in the state of California due to these historical injustices. Residents are surrounded by pollution sources, including the Port of San Diego's Tenth Avenue Marine Terminal, large shipyards, San Diego Naval Stations, the I-5 freeway, the Coronado Bridge, the BNSF railyard, as well as many smaller industries within the residential community itself.

The health consequences on Barrio Logan residents are well documented by CalEnviroScreen - California's tool to identify communities most burdened by pollution.⁴ According to Cal EnviroScreen 4.0, census tracts in Barrio Logan are consistently ranked number one in the county for most impacted by Diesel Particulate Matter (DPM), toxic releases and other harmful pollutants. Barrio Logan's rate of asthma-related hospital visits is higher than 95% of census tracts throughout the state, with about 109 visits per 10,000 people.⁵ Cancer is also a major health hazard for residents; Barrio Logan's cancer risk is in the 85th-95th percentile nationally.⁶

This community has long fought for environmental justice by reclaiming land under the bridge to create Chicano Park, planting gardens, banning methyl bromide and chrome plating. Most recently, despite an industry-led referendum, community members advanced the Barrio Logan Community Update through City Council approval and finally separated industrial uses from sensitive uses – a historic win. However, without any requirement for previously conforming, polluting businesses to relocate, the improvements in air quality can be lifetimes away.

² Relevant sections of the Strategic plan can be found in the Champion Sustainability section.

<https://performance.sandiego.gov/champion-sustainability/>

³ <https://www.sandiego.org/campaigns/happiness-is-calling/barrio-logan.aspx>

⁴ https://experience.arcgis.com/experience/11d2f52282a54ceebcac7428e6184203/page/CalEnviroScreen-4_0/

⁵ https://experience.arcgis.com/experience/ed5953d89038431dbf4f22ab9abfe40d/page/Indicators/?data_id=dataSource_33-17c3d380fd6-layer-3%3A2588&views=Asthma

⁶ <https://www.environmentalhealth.org/communities/logan/>

THE DEFINITION OF “HARMFUL USES” IS TOO LIMITED IN SCOPE.

HAP 2.0 proposed language states that previously conforming industrial uses in areas zoned for homes and mixed- use development can “negatively affect community members and reduce the quality of life in these neighborhoods,” resulting in serious environmental justice conflicts.⁷

To address this problem, HAP 2.0 identifies the following operations as “harmful-uses” when located within 50 feet to residential areas, and when rezoned to allow residential, proposes to no longer permit operations after 15 years.

Junk Yards, Wrecking and Dismantling of Motor Vehicles, Very Heavy Industrial Uses, and the following types of Recycling Facilities: Large Collection Facilities, Large Construction and Demolition Debris Recycling Facility, Large Processing Facility Accepting at least 98% of Total Annual Weight of Recyclables from Commercial and Industrial Traffic, Large Processing Facility Accepting All Types of Traffic, and Tire Processing Facilities.

While we applaud the City of San Diego’s inclusion of these harmful facilities, limiting applicability to only the listed operations will result in a failed opportunity to meaningfully improve quality of life for Barrio Logan residents and provide additional housing opportunities during a housing crisis.

In the portside communities, 84% of the cancer risk is attributed to diesel particulate matter (DPM) pollution.⁸ Phasing out industrial operations that rely heavily on diesel equipment like heavy duty trucks should be a priority. The “harmful use” designation as currently defined does not include warehouses or distribution centers, which directly contribute to heavy duty trucks in the neighborhood. The designation also omits welding facilities and auto body shops, both businesses that emit toxic pollution and are numerous in Barrio Logan.

EHC recommends expanding the operations designated as “harmful operations” to include other sources of pollution and suggests looking to past efforts by the City of San Diego as a blueprint. In the Barrio Logan Community Plan Update, the following Municipal Code Land Use Categories are prohibited in the “transition zone” to limit pollution near sensitive uses. **EHC recommends also including these operations as “harmful uses” in the HAP 2.0 amendments.**

- Heavy/light Manufacturing;
- Commercial/Personal Vehicle Repair and Maintenance;
- Commercial/Personal Vehicle Sales and Rentals;
- Vehicle Equipment and Supplies Sales and Rentals;
- Equipment and Materials storage yards;
- Agricultural processing;
- Building supplies and equipment;
- Building services;

⁷ Page 4. https://www.sandiego.gov/sites/default/files/hap_2.0_revised_code_language_5.26.23_0.pdf

⁸ <https://www.sdapcd.org/content/dam/sdapcd/documents/capp/meetings/portside-csc/031621/031621-V-CARB-Prelim-Air-Toxics-Risk-Modeling-Results.pdf>

- Maintenance and Repair;
- Recycling facilities;
- Welding;
- Trucking and transportation terminals; and
- Distribution facilities.

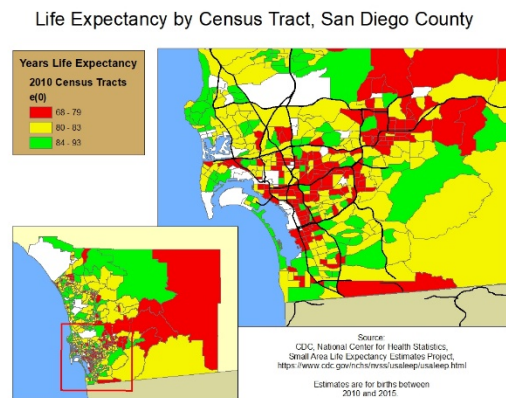
DISCONTINUING HARMFUL USES 50 FEET AWAY FROM HOMES IS NOT ENOUGH TO PROTECT AGAINST TOXIC EXPOSURE.

To reduce exposure to DPM, the California Air Resource Board’s (CARB) Air Quality and Land Use Handbook recommends buffer zones of 500 feet between busy roadways and sensitive receptor locations (schools, residences, health clinics, senior centers, daycares, parks etc.), 1,000 feet from busy distribution centers and rail yards, and generally downwind of busy ports.⁹ At this distance, exposure to pollutants decreases dramatically. Based on these state recommendations, **EHC recommends applying the 1000 ft threshold instead of the 50ft threshold, and to include all sensitive receptor locations, including schools, medical facilities, and parks.**

RESIDENTS SHOULD NOT HAVE TO WAIT 15 YEARS TO LIVE IN TOXIC FREE NEIGHBORHOODS

Average life expectancy for residents living in the Portside are substantially lower than other census tracts in the county of San Diego. As mentioned, Barrio Logan is among the communities most burdened by DPM in the State; DPM attributes for 84% of the cancer risk in the area. The longer a person is exposed to carcinogenics, the more likely they are to develop cancer. After successfully overturning decades of unjust and racist zoning policy, Barrio Logan residents should not have to wait 15 years to see impact. A child born today would breath the highest levels of DPM in the state into adolescents. We need to do better.

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, San Diego’s Portside Environmental Justice Community, comprised of Barrio Logan, Logan Heights, Sherman Heights, and National City, was selected as a monitoring community and 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 quality for inclusion in the CERP.



⁹ <https://files.ceqanet.opr.ca.gov/221458-6/attachment/UNr-g159CW-r0G4DR8q6daNdAKT3RJTd8gQCfz4wqFfl-eNdZNOEqif8tfls1x6Gsae7YqpXwtFIZBd0>

The CERP identifies several goals to reduce air pollution and improve health outcomes, including:

- Goal 1 – By the end of 2030, reduce Diesel PM from 2018 levels by 80% in ambient air at all Portside Community locations.
- Goal 8 - By 2026 reduce cancer risk below 10/million for each permitted stationary source, including portable equipment, in the Portside Environmental Justice Community.

EHC suggests amending HAP 2.0 language to cease permitting operations of previously conforming harmful uses after seven (7) years to advance the CERP goals and meet the 2026 and 2030 timelines.

HAP 2.0 presents a historic opportunity to bring justice to communities long impacted with shorter lifespans and chronic illness to do toxic pollution. We urge the Commissioners to approve HAP 2.0 with suggested amendments, and secure a healthier future for all San Diegans.

Thank you for the opportunity to submit our comments. For any questions or comments, please feel free to contact Julie Corrales at juliec@environmentalhealth.org.

Sincerely,

A handwritten signature in black ink, appearing to be 'Julie Corrales', written in a cursive style.

Julie Corrales
Policy Advocate, Barrio Logan

cc: Councilmember Vivian Moreno, City of San Diego, District 8
Heidi Vonblum, Planning Director, City of San Diego