



**AIR POLLUTION CONTROL DISTRICT GOVERNING BOARD
AGENDA
THURSDAY, MAY 14, 2026, AT 3:00 PM
1600 PACIFIC HIGHWAY ROOM 302 SAN DIEGO, CA 92101**

SPECIAL MEETING

Members of the public can attend the meeting in-person or access the meeting using the following Zoom meeting credentials below:

Phone Numbers:	Meeting ID:
(877) 853-5257 (Toll Free) (888) 475-4499(Toll Free)	837 5414 8704

ORDER OF BUSINESS

A. Roll Call

B. Agenda Items

1. UPDATE ON STRATEGIES TO REDUCE INDIRECT SOURCE EMISSIONS FROM WAREHOUSES AND DISTRIBUTION CENTERS IN SAN DIEGO COUNTY

Item Type: Action

Recommended By: Michael Watt, Chief, Emission Reduction Strategies

Overview: This item was continued from the 4/9/26 Governing Board meeting.

In 2019, California Assembly Bill 423 (Gloria, 2019) (AB 423) amended State law to include a requirement for the San Diego County Air Pollution Control District (District) to “consider adopting an indirect source rule to address pollution from mobile sources that is associated with stationary sources, such as ports, warehouses, and distribution centers.” The Clean Air Act defines an indirect source as “...a facility, building, structure, installation, real property, road, or highway which attracts, or may attract, mobile sources of pollution” but does not include direct sources of emissions associated with these locations (42 U.S.C. §7410(a)(5)(C)), as codified in California Health and Safety Code Section 40100.6.5(a)(6). Pursuant to AB 423, starting in November 2021, staff began evaluation of potential strategies to reduce emissions from indirect sources such as ports, warehouses, and distribution centers located

throughout San Diego County.

In April 2025, the District released a report titled “Warehouse Indirect Source Rule (ISR) Framework Supplement”, also referred to as the “Supplement” (Attachment B). The Supplement presented an update to pertinent sections found in the initial ISR report titled “Options and Considerations for Reducing Indirect Source Emissions at Warehouses, Distribution Centers, and Ports”, also referred to as the “ISR Framework” (Attachment A) for warehouses and distribution centers. The Supplement also provided new or updated information through analysis that was either directed by the Governing Board, Planning and Policy Committee, and/or discussed through the Warehouse Working Group (WWG).

The Supplement and the in-depth technical analysis it contains helped inform the District’s current evaluation of the feasibility of adopting a warehouse ISR in San Diego County. To present this evaluation, on January 16, 2026, the District released a final report titled “Strategies to Reduce Indirect Source Emissions at Warehouses and Distribution Centers White Paper”, also referred to as the “White Paper” (Attachment C). The follow is a summary of the findings and considerations that informed the conclusions of the White Paper. See the referenced sections for more detailed discussions on each item.

- The estimated emission reductions from a potential warehouse ISR in San Diego County are projected to be significantly less than the reductions anticipated from other rulemakings (White Paper, Section 3.1).
- The estimated public health benefits, both regionwide and in under-resourced communities, of a potential warehouse ISR are less than the benefits anticipated from recent and potential future rulemakings (White Paper, Section 3.2).
- The estimated compliance costs of a potential warehouse ISR are greater than the costs anticipated from other rulemakings (White Paper, Section 3.3).
- The estimated cost-effectiveness values of a potential warehouse ISR significantly exceed those for other District rulemakings, as well as cost-effectiveness thresholds used in other air districts (White Paper, Section 3.4).
- A substantial percentage of the facilities identified as “warehouses” in the District’s inventory may not be conducting warehousing activities. This will likely reduce the number of facilities that would potentially be subject to a potential warehouse ISR (White Paper, Section 3.5).
- The estimated one-time and on-going District costs for rule development and administration are substantial, in light of current fiscal uncertainty (White Paper, Section 3.6).
- A warehouse ISR in San Diego County modeled after the South Coast Air Quality Management District (SCAQMD) Rule 2305, which is the only warehouse ISR that has withstood litigation to date, is anticipated to require significant District staff effort for program implementation, outreach, and compliance/enforcement activities (White Paper, Section 3.7).
- SCAQMD Rule 2305 was developed with the goal of reducing regional emissions to attain the federal and State Ozone and PM_{2.5} ambient air quality standards while achieving localized emission reductions as a co-benefit (White Paper, Section 4.1).
- The District considered applicable comments received (White Paper, Section 4.2).
- An analysis of warehouse buildings located in under-resourced communities compared

to the rest of the county demonstrated that a majority of potential warehousing locations (over 70%) are located outside of identified under-resourced communities (White Paper, Section 4.3.2).

- Other State activities, such as Assembly Bill 98 and a possible statewide ISR if adopted in the future, would likely achieve and support mobile source emission reductions from warehousing operations (White Paper, Section 4.4).
- Other potential non-regulatory alternatives for consideration, such as a focused Transport Refrigeration Unit (TRU) incentive program, may provide comparable emission reductions at lower costs and/or resources than anticipated with an ISR (White Paper, Section 5.0).

As detailed above and in the White Paper, the District's analysis supports prioritizing the alternative strategies detailed in Section 5.0 of the report. These strategies offer a practical, efficient, and cost-effective path to achieving emission reductions, advancing compliance with State and federal air quality standards, and improving conditions in communities most impacted by pollution.

One alternative evaluated in Section 5.0 includes a focused Transport Refrigeration Unit (TRU) incentive program, which if successful, could provide comparable emission reductions, both regionally and at the community level, to those anticipated with a warehouse ISR. The District believes such a strategy could be administered more quickly than an ISR, at a lower cost, and could potentially achieve comparable diesel emission reductions in areas where the public congregates (i.e., grocery stores, restaurants, schools, healthcare facilities, etc.).

Given the relatively high estimated cost of implementing a local rule, staff believes that focusing on these alternatives represents the most efficient use of resources at this time. To maintain flexibility and transparency, the District will designate a potential warehouse ISR as a "Further Study Measure" in the upcoming District-prepared plan to attain State ozone standards (i.e., Regional Air Quality Strategy (RAQS)). This ensures the measure remains under active review, with status updates provided to stakeholders as part of the regular RAQS development process. If future evaluations confirm that the measure is both feasible and cost-effective, formal rulemaking activities would commence when appropriate and it may be considered for adoption.

Should the selected alternative strategies encounter delays or fail to deliver expected results, the District can reassess the need for a local warehouse ISR, taking into account statewide developments and implementation progress. This approach balances immediate action with long-term adaptability, ensuring the District remains positioned to achieve air quality goals efficiently and equitably.

Requested Action: Pursuant to the District's analysis in the Warehouse Indirect Source Rule (ISR) Framework Supplement and Strategies to Reduce Indirect Source Emissions at Warehouses and Distribution Centers White Paper, direct the Air Pollution Control Officer to prioritize alternative strategies (as detailed in Section 5.0 of the White Paper) to reduce emissions from indirect sources at warehouses and distribution centers to advance compliance with state and federal air quality standards and improve conditions in communities most impacted by air pollution.

- C. **Air Pollution Control Officer Report**
- D. **Planning and Policy Committee Report**
- E. **Adjournment**

Supporting Documents: Attachments and supporting documentation for items listed on this agenda can be viewed online on the [Air Pollution Control District Governing Board webpage](#) or at the San Diego County Air Pollution Control District, 10124 Old Grove Road, San Diego, CA 92131

Virtual Access Option: Members of the public who wish to attend the meeting virtually may visit the [Air Pollution Control District Governing Board online](#) for meeting information and participation instructions or, send an email to APCDPublicComment@sdapcd.org

In-Person Public Comments: Any person wishing to speak to the Governing Board on a specific agenda item must file a Request to Speak form with the Clerk prior to the scheduled start time of the meeting (for non-agenda public comments) or prior to the time the item is called for discussion (for specific agenda items). Hardcopy forms can be obtained at the meeting from the Clerk.

Virtual Public Comments: Any person wishing to speak to the Governing Board on a specific agenda item must file a Request to Speak form with the Clerk prior to the scheduled start time of the meeting (for non-agenda public comments) or prior to the time the item is called for discussion (for specific agenda items). Persons attending the meeting virtually who wish to address the Governing Board on an item to be considered at this meeting, or on non-agenda items, may submit a Request to Speak form by visiting the [Air Pollution Control District Governing Board online webpage](#).

Written Public Comments: Written comments may be submitted to the [Air Pollution Control District Governing Board online webpage](#). Any written materials to be shared with the Board may be emailed to APCDPublicComment@sdapcd.org to the San Diego County Air Pollution Control District, 10124 Old Grove Road, San Diego, CA 92131. When emailing your comments, please include the meeting date and agenda item. All written comments received prior to the close of the meeting will be made part of the meeting record. Comments received 24 hours prior to the start of the meeting will be posted online with the meeting materials.

Language Interpreter Assistance: Spanish language interpreter services are offered at Board meetings. Additional language interpreter services for public speakers are available upon request to the San Diego County Air Pollution Control District at least 72 hours prior to the meeting. Please contact the Air Pollution Control District Governing Board Clerk at (858) 586-5600 or via e-mail at APCDPublicComment@sdapcd.org if interpreter services are needed.