

Warehouse & Distribution Center Indirect Source Rule



San Diego’s Portside and Border communities breathe some of the most cancer-causing diesel-polluted air in California. However, there are no current regulations to stop diesel pollution coming from highway traffic, warehouses, distribution centers, and in particular the diesel-emitting trucks they attract. In 2025, Congress used the Congressional Review Act to block California’s Advanced Clean Trucks regulation that would have reduced diesel pollution by transitioning heavy-duty-diesel trucks to zero-emission vehicles.

On May 14th, the San Diego Air Pollution Control District (SD APCD) Board will hold a special meeting to vote on developing an indirect source rule (ISR) for warehouses and distribution centers to make them reduce their emissions . This comes after the governing board’s last meeting, on April 9th, when it voted to postpone the vote.

What’s In Our Lungs? Toxic Pollution

- In 2026, San Diego was ranked the **5th worst** year-round particle polluted region in the US.¹
- In 2026, San Diego was ranked the **7th worst** ozone-polluted region in the US.²
- Barrio Logan, West National City, and parts of Otay Mesa breathe **more diesel pollution than 90%** of communities in CA.³

Diesel pollution is bad for our health.

¹ <https://www.lung.org/research/sota/city-rankings/most-polluted-cities>

² <https://www.lung.org/research/sota/city-rankings/most-polluted-cities>

³ https://experience.arcgis.com/experience/11d2f52282a54cee6184203/page/CalEnviroScreen-4_0

- Diesel pollution is known to cause cancer, contribute to premature death, hospitalizations and emergency room visits for worsening chronic heart and lung disease, including asthma, increased respiratory problems, and decreased lung function in children. ⁴
- Diesel emissions cause **84% of the cancer risk** from air pollution in Portside neighborhoods, and **79% of the cancer risk** from air pollution in Border neighborhoods.⁵
- Portside residents have a **higher risk of developing cancer from air toxins** than 93% of the nation.⁶
- Barrio Logan’s rate of **asthma-related hospital visits is higher than 95%** of census tracts throughout the state. ⁷
- **Children in Logan and National City have more than double the rate of asthma emergency room visits** than San Diego County as a whole.⁸
- **Children in San Ysidro and Otay Mesa have almost double the rate of the asthma hospitalization** than the San Diego County as a whole.⁹

Where is diesel pollution coming from? Heavy-duty Diesel Trucks are a Major Contributor.

- On-road mobile sources are the second highest emitters of diesel pollution in the Portside area, with heavy-duty trucks emitting the most in this group at 43%.¹⁰
- Medium and heavy-duty trucks make up only 1% of all vehicles in San Diego County but emit 13% of all diesels particulate matter.¹¹
- The International Border Community has the most warehouses and distribution centers in the county, concentrated in only 24 square miles.¹²
- The Otay Mesa port of entry is the busiest heavy-duty truck crossing in the state and one of the busiest in the country. ¹³

What is an Indirect Source Rule?

Only the federal government has the authority to regulate mobile sources of pollution, like a delivery truck. Until the Trump Administration, the federal government had granted California permission to regulate mobile sources in the form of a waiver, but this current administration denied the waiver to California. However, local air districts can regulate stationary sources, like warehouses and distribution centers.

⁴ ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health

⁵ <https://www.arcgis.com/apps/dashboards/8e81372402f64665a4569f690e4b6e15>

⁶ EPA EJSCREEN Report (Version 2020) AB617 Portside

⁷ <https://experience.arcgis.com/experience/ed5953d89038431dbf4f22ab9abfe40d/>

⁸ CA's Department of Health Care Access & Information (HCIA) 2024 Patient Discharge & Emergency Dept. Databases

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¹⁰ Community Emission Reduction Plan, Phase II, July 2021. Page 41.

¹¹ www.sdapcd.org/content/dam/sdapcd/documents/rules/rule-workshops/060823/ISR-Framework-English.pdf

¹² APCD Warehouse ISR Framework Supplement, page A-2:

<https://www.sdapcd.org/content/dam/sdapcd/documents/rules/warehouse-work-group/april-2025/isr-framework-supplement.pdf>

¹³ <https://ww2.arb.ca.gov/capp/com/cip/international-border-community>

An indirect source rule (ISR) is a way for government to reduce the amount of pollution warehouses, distribution centers and other industries, generate from operations, energy generation, and the vehicles (or mobile sources) that service them - for example, a delivery truck. An ISR can require a warehouse to reduce air pollutants through multiple options including transitioning diesel trucks to zero-emission trucks, electrifying operational equipment, and installing vehicle charging infrastructure.

Why an Indirect Source Rule?

- With the federal government’s aggressive assault on clean air, a local ISR is one of the last tools available to reduce diesel emissions from mobile sources in the county’s most polluted communities.
- The federal government has blocked California’s nation-leading clean vehicle rules. This prevents the state from regulating diesel emissions from mobile sources.¹⁴
- CARB rescinded their Advanced Clean Fleets rule waiver request to the EPA, because the Trump EPA would have rejected it. The Advance Clean Fleet rule would have required drayage and goods movement fleets to reduce emissions by increasing the use of Zero-Emission Vehicles (ZEVs)¹⁵
- An ISR is a proven method for improving air quality, public health, and reducing air pollution. In 2024, the South Coast Air Quality Management District’s warehouse indirect source rule achieved approximately 1.47 tons per day of NOx reductions and 0.035 tons per day of DPM reductions.¹⁶
- An ISR for warehouse and distribution center operations is complementary to stationary source and transportation rules by recognizing the pollution created by sources required by the warehouse to do business.
- The Portside and International Border Community Emission Reduction Plans (CERP) both include an ISR as a strategy to meet their goals.
- State level actions such as AB 98 and potentially AB 1777 are no substitutes for a countywide ISR. AB 98 only applies to new or expanded warehouses and AB 1777 only restates CARB’s authority to enact an ISR but doesn’t create one.

Key Links:

- Webpage: bit.ly/sdcleanairrule
- Send email to SD APCD: bit.ly/SDCleanAirISR

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¹⁴ <https://calmatters.org/environment/2025/05/california-electric-car-mandate-senate-revoke-waiver/>

¹⁵ <https://www.reuters.com/business/environment/california-withdraws-clean-truck-epa-waiver-request-ahead-trump-inauguration-2025-01-15/>

¹⁶ https://www.aqmd.gov/docs/default-source/planning/fbmsm-docs/3rd-annual-report-for-the-waire-program.pdf?sfvrsn=1526a7e_2