

April 18, 2026

Honorable Members of the San Diego City Council  
Sitting as the Housing Authority of the City of San Diego  
202 C Street  
San Diego, CA 92101

**Re: Opposition to the Mercado Apartments Expansion (MAAC) — Main Street & Evans, Barrio Logan**

Dear Council President and Members of the Housing Authority:

I write in respectful but firm opposition to the Mercado Apartments expansion now advancing to the City Council, sitting as the Housing Authority, for consideration. I would note for the record that this project reaches you without a recommendation from the San Diego Housing Commission. At Thursday's hearing, the Commission's motion to approve failed to secure the four affirmative votes required for an endorsement, and the item moves forward with no position from the body whose charge it is to evaluate exactly this kind of proposal. That absence of endorsement is itself meaningful, and I would urge the Housing Authority to weigh it accordingly.

Let me be clear at the outset about what this letter is and is not. It is not opposition to affordable housing, to MAAC, or to the families who would occupy these units. This is the right project. It is simply in the wrong place.

Barrio Logan is one of the most polluted areas of San Diego County and ranks among the top 5% of California's most polluted areas, and it carries the highest diesel pollution in San Diego County. According to the EPA, Barrio Logan residents face an 85% to 95% higher risk of developing cancer than the rest of the United States. The California Air Resources Board has attributed roughly 84% of that cancer risk from air pollution to diesel emissions generated by the surrounding port operations, the 10th Avenue Marine Terminal, rail activity, Navy and NASSCO facilities, and the freeways that frame the neighborhood. These are not my numbers. They are the regulatory record.

The Port of San Diego deserves real credit. The Maritime Clean Air Strategy, the Health Risk Assessment for the marine terminals, the doubling of the Maritime Industrial Impact Fund, the restricted truck routing ordinance, and the 2023 Barrio Logan Community Plan's zoning buffers all represent serious, good-faith work. But the honest assessment is that the Port and Interstate 5 remain the problem, and they will remain the problem for years to come regardless of how well-intentioned the mitigation. Approving 92 additional units directly inside that exposure zone — before the exposure has been materially and verifiably reduced — is a policy decision to place more people into the measured path of a known carcinogen. Overwhelmingly, those people will

be our most economically vulnerable working families, because rent is the only variable they can control.


My heart goes out to the workers and families who already live in this neighborhood. They are there because the rent is all they can afford, and that economic reality cannot be allowed to quietly become the City's public health policy. What we call "affordable" in this location is not actually affordable at all — the discount on the rent is being paid by the residents themselves in a currency the pro forma does not capture: their health. Chronic exposure to diesel particulate matter at the levels documented in Barrio Logan produces a well-established burden of asthma, chronic obstructive pulmonary disease and emphysema, lung cancer, cardiovascular disease, and elevated rates of developmental and cognitive harm in children. These are lifetime costs — borne by the family in suffering and lost earnings, and borne by the taxpayer through Medi-Cal, emergency room utilization, special education, and disability services. A fully loaded accounting of this project would recognize that every dollar of rent subsidy delivered at this site is partially offset, and in many cases entirely overwhelmed, by the downstream public health expenditure it guarantees. "Affordability" should not be the justification used to concentrate disadvantaged households in the most hazardous airshed in the region. That is the definition of the environmental injustice this City has spent more than two decades formally acknowledging.

I would respectfully urge the Housing Authority to take one of three paths:

1. Defer action until the Port's clean-air milestones are independently verified as achieved, not merely adopted on paper.
2. Redirect the equivalent subsidy to produce 92 affordable units at a site with comparable transit access and materially lower air-quality risk — portions of the Midway District, Mission Valley, and the Sports Arena redevelopment area are obvious candidates.
3. At minimum, condition any approval on enforceable protections: MERV-16 or HEPA filtration with sealed building envelopes, independent third-party indoor air monitoring, and long-term health-outcome reporting funded by the project.

The Housing Commission could not muster four votes for this project. The Housing Authority should not supply them either. Good intentions do not neutralize diesel, and we owe the residents of Barrio Logan a housing decision that takes the air they will breathe as seriously as the rent they will pay.

Respectfully,

Signed by:  
  
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Stephen P. Cushman  
Scripps Ranch, San Diego