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**Draft Supplemental Environmental Impact Report (Draft SEIR) for the
Pier B On-Dock Rail Support Facility Project (Proposed Project)
(SCH No: 2009081079)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to review the above-mentioned document. The Port of Long Beach is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff has provided a brief summary of the project information and prepared the following comments which are organized by topic of concern.

Summary and History of Proposed Project

The Pier B On-Dock Rail Support Facility Project (Proposed Project) was originally approved and certified by the Port of Long Beach Board of Harbor Commissioners in January 2018.¹ The approved Pier B Project was designed to expand and modernize the existing Pier B Rail Yard to improve efficiency, reduce truck traffic, and enhance on-dock rail capacity at the Port of Long Beach. Key elements of the approved project included: 1) rail yard expansion; 2) construction of new support facilities; 3) infrastructure improvements; and 4) roadway modifications.² The 2018 Final EIR selected the 12th Street Alternative as the Proposed Project, which involved expanding the yard from 12 to 48 total tracks, widening the existing rail bridge over the Dominguez Channel, and realigning Anaheim Way and Edison Avenue. Because the Pier B Rail Yard was expected to remain operational during construction, the EIR prepared at that time also evaluated overlapping construction and operational emissions.

In April 2022, the U.S. Maritime Administration issued a Record of Decision formally selecting the 12th Street Alternative as both the Selected Project and the Environmentally Preferred Alternative, authorizing the project to proceed with federal participation.³

In August 2023, the Port of Long Beach prepared an Addendum to the certified 2018 Final EIR to evaluate additional modifications which included a temporary expansion of the project boundary

¹ Draft SEIR, page 1-1.

² *Ibid.*

³ Record of Decision, Accessed at: <https://polb.com/documents/#ceqa-nepa>.

by approximately 90 acres to accommodate utility relocation, construction access, staging, and traffic control, as well as the acquisition of several additional parcels.⁴ The Addendum also introduced the use of horizontal directional drilling in place of traditional trenching to relocate the oil pipelines operated by Long Beach Energy Resources. This modification reduced surface disturbance, traffic disruption, and environmental impacts while consolidating the pipeline system from approximately 108,900 to 66,360 linear feet.⁵

The Draft SEIR, released in September 2025, evaluates proposed additions and refinements to the previously approved project and incorporates the 2023 Addendum by reference. According to the Draft SEIR, the proposed modifications involve expanding the previously approved project boundary in seven discrete locations to support construction logistics but do not represent a substantial increase in construction duration or equipment use. The Modified Project includes the following components:⁶ 1) modifications to the Berths D52–D54 transit shed to facilitate Pico Avenue realignment; 2) installation of a new West 12th Street sewer line using trenchless micro-tunneling; 3) relocation of the Control Point Foote Wye track and extension of associated rail signal infrastructure; 4) installation of new utility connections along West Water Street; 5) establishment of a temporary construction staging area for the Dominguez Channel Rail Bridge; 6) pavement restriping and signage improvements near the I-710 Exit 1B and Queen’s Wharf Restaurant; and 7) creation of an Anaheim Street construction staging and laydown area. Construction of the Modified Project is anticipated to occur in 12 months generating less than 110 trips per day,⁷ with no trips generated thereafter, as there are no post-construction operation associated with proposed modifications.⁸

South Coast AQMD Comments

Inadequate Construction Information and Need for Re-examination of Air Quality Impacts

CEQA Guidelines Section 15144 requires a degree of forecasting, and the lead agency must use its best efforts to find out and disclose all it reasonably can. However, the Draft SEIR does not include a detailed construction schedule, equipment list, or estimated duration for each construction phase or activity associated with the proposed modifications. As such, an independent verification of the potential construction-related air quality impacts cannot be conducted. Moreover, without an estimate of the emissions of criteria pollutants and toxic air contaminants (TACs), the conclusion that the Modified Project would not result in new or more severe impacts beyond those disclosed in the certified 2018 Final EIR is not supported by evidence in the record.

As stated in the Draft SEIR, construction of the proposed modifications is anticipated to occur over approximately 12 months in multiple phases and would generate up to 110 daily vehicle trips. These additional trips represent a temporary but potentially substantial increase in daily construction activity and associated emissions. Further, the construction activities may overlap with other regional projects, including the Vincent Thomas Bridge (VTB) Deck Replacement Project, which is anticipated to be under construction from October 2025 through March 2027.⁹

⁴ EIR Addendum, page 2-3.

⁵ *Ibid.*

⁶ Draft SEIR, Chapter 2.3.

⁷ Draft SEIR, Page 4-9.

⁸ *Ibid.*

⁹ *Ibid.*

Overlapping construction schedules could result in worsened cumulative impacts in the form of compounded emissions, increased localized air quality impacts, greater traffic congestion than what was previously analyzed.

In addition, South Coast AQMD did not have the opportunity to review or comment on the 2023 Addendum to the Final EIR prior to its adoption, even though the Addendum introduced substantial project modifications including but not limited to the expansion of the project boundary by 90 acres and the use of Horizontal Directional Drilling, that could have adverse air quality impacts during construction from mobile sources and increased soil disturbances.

As such, the Lead Agency is recommended to revise the construction-related air quality analysis in the Draft SEIR to include emission estimates based on the following:

1. A detailed construction schedule, including phasing and duration of each major activity;
2. A complete list of construction equipment, including horsepower ratings, load factors, and daily usage; and
3. A revised construction emissions analysis that accounts for potential overlap with nearby projects, such as the VTB Deck Replacement Project.

Incorporating this information is necessary to provide a complete and transparent evaluation of construction-related air quality impacts. If, upon reexamination, the updated analysis identifies new or more severe impacts than previously disclosed, recirculation of the Draft SEIR pursuant to CEQA Guidelines Section 15088.5 may be warranted.

Need for Substantial Evidence Regarding Post-Construction Operations

The Draft SEIR indicates that construction of the Modified Project is anticipated to occur over approximately 12 months in multiple phases and would generate up to 110 daily trips. However, during operation of the Modified Project, the Draft SEIR concludes that there will no trips or operational emissions without providing substantial evidence to support this assertion.

If the modifications include new infrastructure, equipment, or facilities that may require long-term maintenance, inspections, or periodic operations, then personnel would be needed and there would be operational trips associated with these activities. This information should be disclosed and analyzed as part of post-construction activities.

Therefore, the Lead Agency is recommended to provide additional details in the Final SEIR which demonstrates why the Modified Project will not generate operational trips and associated emissions by providing additional information including but not limited to project design documentation, operational plans, or contractual restrictions limiting post-construction uses. Providing such evidence is necessary to ensure that the Draft SEIR accurately characterizes the project's potential environmental impacts and complies with CEQA's requirement for a complete and transparent analysis.

Consideration of Zero-Emission Rail Technologies

For rail-related components of the Proposed Project, South Coast AQMD recommends that the Lead Agency evaluate the feasibility of incorporating zero-emission (ZE) switch locomotives and developing the necessary charging or fueling infrastructure to support their deployment. Implementing such measures would be consistent with South Coast AQMD's ongoing efforts to accelerate the transition to cleaner rail technologies within the South Coast Air Basin.

Potential Cooperative Agreement with the Ports of Long Beach and Los Angeles

The Lead Agency is also encouraged to review the *Proposed Draft Cooperative Agreement Between South Coast AQMD and the Ports of Long Beach and Los Angeles* (October 10, 2025) for guidance on potential strategies, mitigation measures, and commitments to reduce emissions. Information and related materials on the potential cooperative agreement are available at: <https://www.aqmd.gov/home/air-quality/air-quality-management-plans/air-quality-mgt-plan/facility-based-mobile-source-measures/comm-ports-wkng-grp/potential-cooperative-agreement-with-the-ports-of-long-beach-and-los-angeles>.

Information on the CERP for the Designated AB 617 Wilmington, Carson, West Long Beach (WCWLB) Community

The Proposed Project area includes the AB 617-designated Wilmington, Carson, West Long Beach (WCWLB) community and is heavily impacted by air pollution generated from sources such as ports, refineries, oil and gas industry, heavy-duty diesel trucks, warehouses, and railroad activities. As part of the AB 617 process, South Coast AQMD is required to work with a Community Steering Committee (CSC) to develop a Community Emission Reduction Plan (CERP) that identifies air quality priorities and related actions to reduce air pollution in the community. The South Coast AQMD Governing Board adopted the WCWLB CERP on September 6, 2019.¹⁰ South Coast AQMD staff recommends that the Lead Agency review the actions to reduce air pollution in the community included in Chapter 5 of the WCWLB CERP, which can be found here: <https://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/wilmington/cerp/final-cerp-wcwlb.pdf>.

South Coast AQMD recommends the Lead Agency evaluate how the Proposed Project aligns with emission reduction objectives in the WCWLB CERP, particularly those addressing rail, port, and truck sources. South Coast AQMD also recommends the Lead Agency continue working with our agency to explore whether additional measures to mitigate or further reduce emissions can be implemented at the Proposed Project to support actions in the WCWLB CERP.

¹⁰ South Coast AQMD. September 2019. Assembly Bill 617 Wilmington, West Long Beach, Carson Community Emissions Reduction Plan. Accessed at: <https://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/wilmington/cerp/final-cerp-wcwlb.pdf>.

Additional Recommended Air Quality and Greenhouse Gases Mitigation Measures and Project Design Considerations

South Coast AQMD staff notes that the mitigation measures relied upon in the Draft SEIR are largely carried over from the 2018 Final EIR. Since that time, regulatory requirements, construction practices, and available emission reduction technologies have evolved substantially. CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse air quality impacts. Given To further reduce the Proposed Project's air quality impacts, South Coast AQMD recommends incorporating the following mitigation measures and project design considerations into the Final SEIR.

Mitigation Measures for Operational Air Quality Impacts

Mobile Sources

1. Require zero-emission (ZE) or near-zero emission (NZE) on-road haul trucks, such as heavy-duty trucks with natural gas engines that meet the CARB's adopted optional NOx emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr), if and when feasible.

Note: Given the state's clean truck rules and regulations aiming to accelerate the utilization and market penetration of ZE and NZE trucks, such as the Advanced Clean Trucks Rule and the Heavy-duty Low NOx Omnibus Regulation, ZE and NZE trucks will become increasingly more available to use.

2. Require a phase-in schedule to incentivize the use of cleaner operating trucks to reduce any significant adverse air quality impacts.

Note: South Coast AQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency.

3. Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the Final SEIR. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the Proposed Project through CEQA prior to allowing this higher activity level.
4. Provide electric vehicle (EV) charging stations or, at a minimum, provide electrical infrastructure, and electrical panels should be appropriately sized. Electrical hookups should be provided for truckers to plug in any onboard auxiliary equipment.

Other Area Sources

1. Maximize the use of solar energy by installing solar energy arrays.
2. Use light-colored paving and roofing materials.
3. Utilize only Energy Star heating, cooling, and lighting devices and appliances.

Design Considerations for Reducing Air Quality and Health Risk Impacts

1. Clearly mark truck routes with trailblazer signs so that trucks will not travel next to or near sensitive land uses (e.g., residences, schools, daycare centers, etc.).
2. Design the Proposed Project such that truck entrances and exits are not facing sensitive receptors and trucks will not travel past sensitive land uses to enter or leave the Proposed Project site.
3. Design the Proposed Project such that any truck check-in point is inside the Proposed Project site to ensure no trucks are queuing outside.
4. Design the Proposed Project to ensure that truck traffic inside the Proposed Project site is as far away as feasible from sensitive receptors.
5. Restrict overnight truck parking in sensitive land uses by providing overnight truck parking inside the Proposed Project site.

Lastly, the South Coast AQMD also suggests that the Lead Agency conduct a review of the following references and incorporating additional mitigation measures as applicable to the Proposed Project in the Final SEIR:

1. State of California – Department of Justice: Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act¹¹
2. South Coast AQMD 2022 Air Quality Management Plan,¹² specifically:
 - a) Appendix IV-A – South Coast AQMD’s Stationary and Mobile Source Control Measures
 - b) Appendix IV-B – CARB’s Strategy for South Coast
 - c) Appendix IV-C – SCAG’s Regional Transportation Strategy and Control Measure
3. United States Environmental Protection Agency (U.S. EPA): Mobile Source Pollution - Environmental Justice and Transportation.¹³

¹¹ State of California – Department of Justice, Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act. Available at: <https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf>

¹² South Coast AQMD, 2022 Air Quality Management Plan (AQMP). Available at: <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan>

¹³ United States Environmental Protection Agency (U.S. EPA), Mobile Source Pollution - Environmental Justice and Transportation. Available at: <https://www.epa.gov/mobile-source-pollution>.

South Coast AQMD Air Permits and Role as a Responsible Agency

If implementation of the Proposed Project would require the use of new stationary and portable sources, including but not limited to emergency generators, fire water pumps, boilers, etc., air permits from South Coast AQMD will be required. The final CEQA document, should include a discussion about the potentially applicable rules that the Proposed Project needs to comply with. Those rules may include, for example, Rule 201 – Permit to Construct,¹⁴ Rule 203 – Permit to Operate,¹⁵ Rule 401 – Visible Emissions,¹⁶ Rule 402 – Nuisance,¹⁷ Rule 403 – Fugitive Dust,¹⁸ Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,¹⁹ Rule 1113 – Architectural Coating,²⁰ Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil,²¹ Rule 1179 – Publicly Owned Treatment Works Operations,²² Regulation XIII – New Source Review,²³ Rule 1401 – New Source Review of Toxic Air Contaminants,²⁴ Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities,²⁵ Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants,²⁶ Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines,²⁷ etc. It is important to note that when air permits from South Coast AQMD are required, the role of South Coast AQMD would change from a Commenting Agency to a Responsible Agency under CEQA. In addition, if South Coast AQMD is identified as a Responsible Agency, per CEQA Guidelines Sections 15086, the Lead Agency is required to consult with South Coast AQMD.

CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of the process for conducting a review of the Proposed Project and issuing discretionary approvals.

For these reasons, the final CEQA document should be revised to include a discussion about any and all new stationary and portable equipment requiring South Coast AQMD air permits, provide the evaluation of their air quality and greenhouse gas impacts, and identify South Coast AQMD as a Responsible Agency for the Proposed Project as this information will be relied upon as the basis for the permit conditions and emission limits for the air permit(s). Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions regarding what types of equipment would require air permits. For more general information on permits, please visit South Coast AQMD's webpage at <https://www.aqmd.gov/home/permits>.

¹⁴ South Coast AQMD. Rule 201 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>

¹⁵ South Coast AQMD. Rule 203 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>

¹⁶ South Coast AQMD. Rule 401 available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf>

¹⁷ South Coast AQMD. Rule 402 available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>

¹⁸ South Coast AQMD. Rule 403 available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403>

¹⁹ South Coast AQMD. Rule 1110.2 available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf

²⁰ South Coast AQMD. Rule 1113 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf>

²¹ South Coast AQMD. Rule 1166 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>

²² South Coast AQMD. Rule 1179 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1179.pdf>

²³ South Coast AQMD. Regulation XIII available at: <https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii>

²⁴ South Coast AQMD. Rule 1401 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf>

²⁵ South Coast AQMD. Rule 1403 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1403.pdf>

²⁶ South Coast AQMD. Rule 1466 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf>

²⁷ South Coast AQMD. Rule 1470 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf>

Conclusion

As set forth in California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b), the Lead Agency shall evaluate comments from public agencies on the environmental issues and prepare a written response at least 10 days prior to certifying the Final SEIR. As such, please provide South Coast AQMD written responses to all comments contained herein at least 10 days prior to the certification of the Final SEIR. In addition, as provided by CEQA Guidelines Section 15088(c), if the Lead Agency's position is at variance with recommendations provided in this comment letter, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided.

Thank you for the opportunity to provide comments. South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Jivar Afshar, Air Quality Specialist, at jafshar@aqmd.gov should you have any questions.

Sincerely,

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