

SENT VIA E-MAIL:

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Notice of Intent to Prepare the Draft Environmental Impact Statement¹
/Environmental Impact Report (EIS/EIR)² for the Pier T Marine
Terminal Redevelopment Project (Proposed Project)
(SCH #: 2026061282)

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to comment on the above-referenced document for the Proposed Project. The following comments provide observations and recommendations regarding the analysis of potential air quality and greenhouse gas impacts from the Proposed Project that should be addressed in the Draft EIS/EIR. Upon its completion and public release, please transmit a copy of the Draft EIS/EIR directly to South Coast AQMD to the contacts provided in the closing remarks of this letter. **In the transmittal, please also provide electronic versions of all appendices and technical documents related to the air quality, health risk, and greenhouse gas analyses in their original format (e.g., not in .pdf), including but not limited to emission calculation spreadsheets, air quality modeling files, and health risk assessment input and output files.**

General Conformity Compliance

Pursuant to federal Clean Air Act Section 176(c) (42 U.S.C. 7506) and the United States Environmental Protection Agency's (U.S. EPA) implementing regulations (40 CFR Part 93, Subpart B and 40 CFR Part 51, Subpart W), general conformity is required for federal actions located within South Coast AQMD jurisdiction due to its designation of nonattainment with multiple National Ambient Air Quality Standards (NAAQS).³ General Conformity requirements are intended to prevent federal actions from: 1) causing or contributing to new violations of

¹ Notice of Intent to Prepare an Environmental Impact Statement/Scoping Meeting, Permit Application No. SPL-2024-00634-JAZ. U.S. Army Corps of Engineers, Los Angeles District. Accessed at <https://thehelm.polb.com/download/3210/pier-t-marine-terminal-redevelopment-project/27545/polb-piert-pn-spl-2024-00634-6-july-2026-final.pdf>

² Notice of Preparation of An Environmental Impact Report and Notice of Public Scoping Meetings for Pier T Marine Terminal Redevelopment Project. Port of Long Beach Accessed at: https://thehelm.polb.com/download/3210/pier-t-marine-terminal-redevelopment-project/27299/20260622_nop-pier-t-project-scoping.pdf

³ U.S. EPA, "What is General Conformity?", <https://www.epa.gov/general-conformity/what-general-conformity>

NAAQS; 2) interfering with provisions in the applicable SIP for maintenance of any NAAQS; 3) increasing the frequency or severity of existing violations of any standard; or 4) delaying the timely attainment of any standard. Federal agencies must perform a conformity evaluation and make a determination that a federal action conforms to an applicable state implementation plan by demonstrating that the anticipated emission increases from the project would not interfere with the State's effort to attain or maintain applicable NAAQS.

40 CFR Section 93.152 defines federal action as any activity engaged in by a department, agency, or instrumentality of the federal government, or any activity that a department, agency or instrumentality of the federal government supports in any way, provides financial assistance for, licenses, permits, or approves, other than activities related to transportation plans, programs, and projects developed, funded, or approved under Title 23 U.S.C. or the Federal Transit Act (49 U.S.C. 1601 et seq.). Because the Proposed Project has a federal component, the NEPA Lead Agency should conduct a general conformity analysis. The anticipated emission increases from the Proposed Project should be compared to the applicable De Minimis thresholds defined in the U.S. EPA's general conformity rule.⁴ If the emissions exceed the thresholds and are not accounted for in the applicable state implementation plan, the entirety of the increased emissions should be offset or mitigated. Please transmit the general conformity analysis via email to South Coast AQMD, to the attention of Sang-Mi Lee, Ph.D., Planning & Rules Manager, Planning, Rule Development & Implementation, at slee@aqmd.gov. For general information about other projects located within South Coast AQMD jurisdiction that are subject to general conformity requirements, please visit South Coast AQMD's webpage.⁵

Air Quality and Greenhouse Gas Analysis

The Proposed Project would involve approximately 17 years of construction while the existing terminal remains operational. Construction would involve substantial use of diesel-fueled heavy-duty trucks, off-road construction equipment, and other diesel-fueled equipment and processes, including potentially the need for an on-site concrete batch plant. For the air quality and greenhouse gas (GHGs) analysis of these potential emission sources in the upcoming Draft EIS/EIR, the CEQA Lead Agency is recommended to rely on the guidance provided in South Coast AQMD's CEQA Air Quality Handbook and website⁶, including the South Coast AQMD air quality significance thresholds, and use the California Air Pollution Control Officers Association's California Emissions Estimator Model (CalEEMod)⁷ software to quantify emissions from each construction and operation phase of the Proposed Project. Moreover, the Draft EIS/EIR should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. The potential emissions from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment used for grading, earth-loading/unloading, paving, architectural coatings, on-site concrete batch plants, off-road mobile sources (e.g., heavy-duty construction equipment) and on-

⁴ 40 Code of Federal Regulations (CFR), Part 93, Subpart B, General Conformity Regulations, <https://www.ecfr.gov/current/title-40>

⁵ General conformity projects occurring in South Coast AQMD: <https://www.aqmd.gov/home/rules-compliance/ceqa/general-conformity>

⁶ South Coast AQMD's CEQA Handbook and other resources for preparing air quality analyses can be found at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>.

⁷ CalEEMod is available free of charge at: www.caleemod.com.

road mobile sources (e.g., construction worker vehicle trips, material transport trips, and hauling trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., emergency engines and air pollution control devices), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). The analysis should also include air quality impacts from indirect sources, such as sources that generate or attract vehicular trips.

Since construction is anticipated to span 17 years and will require large quantities of mobile sources, the analysis in the Draft EIS/EIR should clearly delineate each phase of the Proposed Project (e.g., construction only, construction overlapping with operation, and operation) and conduct the air quality and GHG emissions analysis for each phase. Furthermore, when overlapping construction and operational activities occur, the emissions from both construction and operation should be combined and compared to South Coast AQMD's air quality significance thresholds for operation when determining the level of significance.

In addition to the South Coast AQMD's regional air quality significance thresholds⁸, the South Coast AQMD also adopted localized significance thresholds (LST).⁹ The LST methodology provides screening tables for evaluating localized air quality impacts from typical small projects; however, the screening tables are not applicable to project sites larger than five acres, projects requiring more than one shift, or projects where emissions are distinctly non-uniform across the site, among other limitations as indicated in Table 3-2 of the South Coast AQMD LST methodology. Projects that exceed these limitations should conduct a site-specific localized significance analysis.

The Proposed Project would involve multiple, concurrent construction activities and require the use of a substantial number of emission sources distributed across a large terminal area over an approximately 17-year construction period. Given the substantial size, scale and complexity of the Proposed Project in light of its long-term construction activities, reliance on the LST screening tables for the analysis in the Draft EIS/EIR would not be appropriate. Instead, a tailored air quality analysis which relies on air dispersion modeling should be performed to evaluate the localized impacts during construction and operations of the Proposed Project.

Health Risk Assessment

The South Coast AQMD Multiple Air Toxics Exposure Study (MATES V), completed in August 2021, concluded that the largest contributor to cancer risk from air pollution is emissions of diesel particulate matter (DPM).¹⁰ According to the MATES V carcinogenic risk interactive map, the area surrounding the Proposed Project has an estimated baseline cancer risk of over 700 cases in one million.¹¹

⁸ South Coast AQMD's air quality significance thresholds can be found at: <https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf>

⁹ South Coast AQMD's guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

¹⁰ South Coast AQMD. August 2021. *Multiple Air Toxics Exposure Study in the South Coast Air Basin V*. Available at: <http://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v>.

¹¹ South Coast AQMD. MATES V Data Visualization Tool. Accessed at: [MATES Data Visualization \(arcgis.com\)](https://arcgis.com).

The South Coast AQMD acknowledges the ongoing efforts by the Ports of Long Beach and Los Angeles to reduce emissions from port-related mobile sources through the November 2025 Cooperative Agreement and the August 2026 Addendum to the Cooperative Agreement between South Coast AQMD and the Ports of Long Beach and Los Angeles.^{12,13} The November 2025 Cooperative Agreement established a framework for developing and implementing zero-emission infrastructure plans for port sources, including cargo-handling equipment, drayage trucks, locomotives, harbor craft, and ocean-going vessels, while the August 2026 Addendum provided additional measures to achieve near-term and interim emission reductions. However, these broader ongoing emission reduction efforts for the Ports' areas do not eliminate the need to evaluate the Proposed Project's project-specific health risk impacts. Given the unusually long construction period combined with the substantial number of diesel-fueled trucks and other equipment that will be needed, and the high existing background cancer risk in and surrounding the Port area, the Draft EIS/EIR should include a quantitative evaluation of the potential health risk impacts associated with both construction and operation of the Proposed Project. The health risk assessment should evaluate emissions from all relevant construction- and operation-related sources and assess the potential cancer risk to the nearby sensitive receptors over the construction and operation periods. For guidance on performing a health risk assessment including a mobile source health risk assessment, please refer to South Coast AQMD's website.¹⁴

Mitigation Measures

In the event that the Proposed Project results in significant adverse air quality and GHG emission impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize, prevent or eliminate these impacts. Any impacts resulting from mitigation measures must also be analyzed. Several resources are available for assistance with identifying potential mitigation measures for the Proposed Project including but not limited to the general principles found in the South Coast AQMD CEQA Air Quality Handbook,¹⁵ and more specifically and recently in the Mitigation Monitoring and Reporting Plan for the South Coast AQMD 2022 Air Quality Management Plan.¹⁶

In addition, the following mitigation measures are recommended for the Proposed Project:

- Requiring 100 percent Alternative Maritime Power (AMP) infrastructure and use by AMP-capable vessels;
- Transitioning cargo handling equipment to zero-emission equipment consistent with the Ports' 2030 goal;
- Requiring the cleanest available harbor craft during construction, using Tier 4 Final or cleaner switch locomotives with a transition to zero-emission locomotives;
- Encouraging cleaner ocean-going vessels and compliance with applicable International Maritime Organization (IMO) emission standards;

¹² South Coast AQMD, November 2025 Cooperative Agreement between South Coast AQMD and the Ports of Long Beach and Los Angeles. Access at: <https://www.aqmd.gov/docs/default-source/agendas/governing-board/2025/2025-nov7-030.pdf>

¹³ South Coast AQMD, August 2026 Addendum to Cooperative Agreement Between South Coast AQMD and Ports of Long Beach and Los Angeles: <https://www.aqmd.gov/docs/default-source/agendas/governing-board/2026/2026-aug7-030.pdf>

¹⁴ South Coast AQMD guidance for performing a mobile source health risk assessment can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

¹⁵ South Coast AQMD, CEQA Air Quality Handbook, Available at: <https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>

¹⁶ South Coast AQMD, 2022 Air Quality Management Plan, Chapter 4 - Control Strategy and Implementation, Available at: <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan>.

- Implementing a phased transition to zero-emission drayage trucks with sufficient charging infrastructure consistent with the Ports' 2035 goal; and
- Prioritizing direct onsite GHG reductions before relying on GHG offsets.

Other helpful resources for identifying potential mitigation measures are the Mitigation Monitoring and Reporting Plan for the Southern California Association of Governments (SCAG) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy,¹⁷ and the California Air Pollution Control Officers Association (CAPCOA) GHG mitigation handbook.¹⁸

Any mitigation measures incorporated in the Draft EIS/EIR to address significant air quality and GHG impacts that may result from the Proposed Project should be fully enforceable through legally-binding instruments and incorporated into a Mitigation Monitoring and Reporting Program to ensure that the measures are implemented as required and that compliance is appropriately monitored and documented.

Technology Advancement Office and Ports' Technology Advancement Program

The Technology Advancement Office (TAO) in South Coast AQMD works closely with the Ports, industry, and technology developers through the Ports' Technology Advancement Program (TAP) to develop, demonstrate, and deploy cleaner technologies that reduce emissions from goods movement activities. TAO also administers a broad portfolio of existing incentive and technology programs that support emission reductions at and around the Ports, including Proposition 1B, the Carl Moyer Program, INVEST CLEAN, the Clean Fuels Program, and other state- and federally funded initiatives. These programs have supported projects involving heavy-duty trucks, marine vessels, cargo-handling equipment, locomotives, and charging and fueling infrastructure.

Recent projects demonstrate the breadth of this work. The Sustainable Terminals Accelerating Regional Transformation (START) project deployed zero-emission technologies at the Port of Long Beach, including 33-yard tractors, five Class 8 trucks, nine rubber-tired gantry cranes, and a battery-electric tugboat. Other efforts include the Port of Long Beach Zero-Emission and Hybrid Terminal Equipment Deployment and Demonstration Project, as well as advanced marine vessel projects involving multi-fuel engine retrofits, selective catalytic reduction, diesel particulate filters, waste heat recovery, and technologies designed to enable future use of lower- and zero-carbon fuels.

Continued coordination with TAO is recommended to help identify and prioritize projects, determine appropriate funding sources, quantify emission reductions, leverage available public and private funding, and accelerate technologies from demonstration to broader deployment. Consistent with TAP objectives, projects would be structured to maximize feasible emission reductions and prioritize the use of zero-emission technologies wherever technically and operationally practicable, while incorporating the most effective available control strategies for applications where zero-emission solutions are not yet commercially viable. This approach can

¹⁷ SCAG, 2020-2045 RTP/SCS can be found at: <https://scag.ca.gov/connect-socal>, https://www.connectsocal.org/Documents/PEIR/certified/Exhibit-A_ConnectSoCal_PEIR.pdf.

¹⁸ California Air Pollution Control Officers Association (CAPCOA), Quantifying Greenhouse Gas Mitigation Measures: A Resource for Local Government to Assess Emission Reductions from Greenhouse Gas Mitigation: https://www.airquality.org/ClimateChange/Documents/2024%20Handbook%20Update_AB434.pdf

help ensure that available funding delivers the greatest achievable air quality benefits and supports mitigation of emissions associated with the Proposed Project.

Proposed Project is Located in the Designated AB 617 Wilmington, Carson, West Long Beach (WCWLB) Community

The Proposed Project area is located within the AB 617-designated WCWLB community, which 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 coordinated with the Community Steering Committee (CSC) which developed a Community Emission Reduction Plan (CERP) that identifies the air quality priorities and related actions needed to reduce air pollution in this community. The South Coast AQMD Governing Board adopted the WCWLB CERP on September 6, 2019.¹⁹ Both Lead Agencies are recommended to review the actions in Chapter 5 of the WCWLB CERP to ensure that the Proposed Project comports with the air pollution reduction priorities in this community. Both Lead Agencies are also recommended to continue working with South Coast AQMD to explore whether additional measures to mitigate or further reduce emissions can be implemented at the Proposed Project site to support actions in the WCWLB CERP.

Cumulative Impacts

Both Lead Agencies are recommended to provide a comprehensive evaluation of the Proposed Project's potential cumulative air quality and transportation impacts in the Draft EIS/EIR. Given the Proposed Project's approximately 17-year construction period and its potential to handle up to approximately 6.1 million TEUs annually at full buildout, construction and operation could overlap with other major port development projects in the Ports of Long Beach and Los Angeles, including but not limited to other ongoing and proposed projects such as Pier B On-Dock Rail Support Facility Project,²⁰ Pier S Battery Energy Storage System (BESS) Project,²¹ Pier Wind Terminal Development Project,²² the Berths 121-131 Container Terminal Redevelopment Project,²³ Pier 500 Marine Container Terminal Project,²⁴ Vincent Thomas Bridge Deck Replacement Project in the Ports of Long Beach and Los Angeles area,²⁵ and the zero-emission infrastructure projects to be laid out in each Port's Zero-Emission Infrastructure Plans (as discussed in the following section of this letter).

Therefore, in accordance with CEQA Guidelines Section 15130,²⁶ the Draft EIS/EIR is required to identify and evaluate the cumulative impacts resulting from the Proposed Project in combination with the effects of these and other past, present, and reasonably foreseeable future projects, including potential increases in heavy-duty truck and rail activity, vessel activity, cargo-handling

¹⁹ South Coast AQMD. September 2019. Assembly Bill 617 Wilmington, West Long Beach, Carson (WCWLB) Community Emissions Reduction Plan (CERP). Accessed at: <https://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/wilmington/cerp/final-cerp-wcwlw.pdf>.

²⁰ Port of Long Beach, Pier B On-Dock Rail Support Facility Project: <https://ceqanet.lci.ca.gov/2009081079/13>

²¹ Port of Long Beach, Pier S Battery Energy Storage System (BESS) Project: <https://ceqanet.lci.ca.gov/2024120596/2>

²² Port of Long Beach, Pier Wind Terminal Development Project: <https://ceqanet.lci.ca.gov/2023110696>

²³ Port of Los Angeles, Berths 121-131 Container Terminal Redevelopment Project: <https://ceqanet.lci.ca.gov/2014041050/2>

²⁴ Port of Los Angeles, Pier 500 Marine Container Terminal Project: https://portoflosangeles.org/references/2025-news-releases/news_100125_pier_500_rfp

²⁵ Vincent Thomas Bridge Deck Replacement Project: <https://ceqanet.lci.ca.gov/2023040301/2>

²⁶ CEQA Guidelines Section 15130: Cal. Code Regs. Tit. 14, § 15130 - Discussion of Cumulative Impacts | State Regulations | US Law | LII / Legal Information Institute

equipment, and other mobile and stationary emission sources. The cumulative impacts analysis should also evaluate the cumulative impacts on communities located along the applicable freight corridors, including the AB 617-designated WCWLB community. Where significant cumulative impacts are identified, the Draft EIS/EIR should analyze whether the Proposed Project's incremental contribution would be cumulatively considerable and identify all feasible mitigation measures to reduce such impacts.

Consistency with the Ports' Zero-Emission Infrastructure Planning

The Lead Agencies are recommended to evaluate and ensure the Proposed Project's consistency with the November 2025 Cooperative Agreement and August 2026 Addendum to the Cooperative Agreement between South Coast AQMD and the Ports of Long Beach and Los Angeles (Cooperative Agreement and Addendum) and the associated zero-emission infrastructure planning requirements. The Cooperative Agreement and Addendum require the Ports to develop comprehensive zero-emission infrastructure plans, including a Phase 1 Plan addressing infrastructure for container-terminal cargo-handling equipment and drayage trucks, due by December 31, 2027.

Given the Proposed Project's stated objective to transition to zero-emission equipment, the Lead Agencies are recommended to coordinate with South Coast AQMD, and other relevant entities including but not limited to permitting agencies and electrical utilities, to ensure that the Proposed Project's design, equipment, and supporting infrastructure are consistent with applicable elements of the Cooperative Agreement and Addendum as well as the Phase 1 Plan. The Draft EIS/EIR should identify the infrastructure needed to support the proposed transition to zero-emission equipment and evaluate the associated environmental impacts.

In addition, the design of the Proposed Project should also align with the upcoming Phase 2 Plan for on-port switcher locomotives and harbor craft, as well as Phase 3 Plan for ocean-going vessels, to ensure the Proposed Project is designed to support the implementation of these upcoming plans where applicable.

Responsible Agency and 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. Moreover, it is important to note that if a Responsible Agency determines that a CEQA document is not adequate to rely upon for its discretionary approvals, the Responsible Agency must take further actions listed in CEQA Guideline Section 15096(e), which could have the effect of delaying the implementation of the Proposed Project. In its role as CEQA Responsible Agency, the South Coast AQMD is obligated to ensure that the CEQA document prepared for this Proposed Project contains a sufficient project description and analysis to be relied upon in order to issue any discretionary approvals that may be needed for air permits.

For these reasons, the Draft EIS/EIR should 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 GHG emission 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). For questions regarding what types of equipment would require air permits, please contact South Coast AQMD's Engineering and Permitting Division at (909) 396-3385. For more general information on permits, please visit South Coast AQMD's webpage at <https://www.aqmd.gov/home/permits>.

South Coast AQMD staff are available to work with the Lead Agencies to ensure that impacts to air quality, GHG emissions, and health risk from the Proposed Project are accurately evaluated and mitigated to the greatest extent possible. Please contact Sahar Ghadimi, Air Quality Specialist, at sghadimi@aqmd.gov or me at SWang1@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

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MK:IM:BR:SL:ES:VP:SC:SW:JL:MH:SG
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