Chapter 10
Responses to Comments

10.1. Distribution of the Draft EIR and Partially Revised and Recirculated Draft EIR

The Draft Environmental Impact Report (EIR) prepared for the Los Angeles Harbor Department (LAHD) was distributed to the public and regulatory agencies on September 15, 2025, for a 45-day review period, which ended on October 30, 2025. Printed copies of the Draft EIR were available for review at the Los Angeles Harbor Department, Environmental Management Division, 425 South Palos Verdes Street, San Pedro, California 90731.

In addition to printed copies of the Draft EIR, digital copies were made available. Due to the size of the document, the 12 digital copies were prepared as a series of PDF files to facilitate downloading and printing and were available on the Port website at https://www.portoflosangeles.org/ceqa. Interested parties were required to provide written comments on the Draft EIR, which must have been postmarked by October 30, 2025. The LAHD conducted a public hearing regarding the Draft EIR on October 1, 2025, to provide an overview of the Proposed Project and alternatives and to accept public comments on the Proposed Project, alternatives, and environmental document. No verbal comments were made at the public hearing. The LAHD received five comment letters on the Draft EIR during the public review period. Table 10-1 presents a list of the agencies that commented on the Draft EIR. No organizations or individuals commented on the Draft EIR.

Table 10-1. Public Comments Received on the Draft EIR

Letter Code	Date	Organization	Page
State, Regional, and Local Government			
CCC	10/30/2025	California Coastal Commission	10-4
CALTRANS	10/30/2025	California Department of Transportation	10-8
CARB	10/24/2025	California Air Resources Board	10-11
DTSC	10/22/2025	Department of Toxic Substances Control	10-22
SCAQMD	10/30/2025	South Coast Air Quality Management District	10-28
ASA	02/20/2026	American Soybean Association	10-44

Following the close of the Draft EIR public comment period, and in response to comments received on the Draft EIR from the California Air Resources Board (CARB) and South Coast Air Quality Management District (SCAQMD) regarding the

methodologies employed in the Draft EIR to calculate proposed Project emissions, the emissions basis was revised and updated emissions modelling conducted. As a result, a Partially Revised and Recirculated Draft EIR was prepared and circulated to government agencies, organizations, and interested individuals for a 45-day review period beginning on January 26, 2026 and ending on March 11, 2026. Printed copies of the Partially Revised and Recirculated Draft EIR were available for review at the Los Angeles Harbor Department, Environmental Management Division, 425 South Palos Verdes Street, San Pedro, California 90731; and a digital copy was available on the Port's website at https://www.portoflosangeles.org/ceqa. One comment letter from the American Soybean Association was received during the Partially Revised and Recirculated Draft EIR review period. No other agencies, organizations, or individuals commented on the Partially Revised and Recirculated Draft EIR.

10.2. Responses to Comments

In accordance with CEQA (State CEQA Guidelines §15088), the LAHD has evaluated the comments on environmental issues received from commenters and has prepared written responses to each comment pertinent to the adequacy of the environmental analyses contained in the EIR (Draft EIR and Partially Revised and Recirculated Draft EIR). Comment letters and responses to the comments are presented in Section 10.3 (*State, Regional, and Local Governments*).

In compliance with State CEQA Guidelines Section 15088(b), the written responses address the environmental issues raised. In addition, where appropriate, the basis for incorporating or not incorporating specific suggestions into the Proposed Project is provided. In each case, the LAHD has expended a good faith effort, supported by reasoned analysis, to respond to comments. Some comments have prompted revisions to the text of the EIR, which are reflected in the respective issue area sections of this Final EIR. A copy of each comment letter is provided, and responses to each comment letter immediately follow. All of the comments received and the responses to those comments will be considered by the decision-makers prior to taking any action on the Proposed Project.

A lead agency is required to recirculate a Draft EIR when the agency adds "significant new information" to the EIR after the close of the public comment period but prior to certification of the Final EIR (Public Resources Code, §21092.1; State CEQA Guidelines, §15088.5). "New information added to an EIR is not 'significant' unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement." (State CEQA Guidelines §15088.5(a)) "Significant" new information includes information showing that "(1) [a] new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented [;] or (2) [a] substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance" (State CEQA Guidelines §15088.5 (a)(1), (a)(2)). In response to comments received from CARB and SCAQMD regarding the methodologies employed in the Draft EIR to calculate proposed Project emissions, the emissions basis was revised and updated emissions modelling conducted. As a result, a new significant, unavoidable impact pertaining to operational emissions that exceed SCAQMD peak day regional

emission thresholds of significance was identified for the Reduced Project Alternative (Alternative 2) in Section 3.1 (*Air Quality and Health Risk*), and a new potentially significant but mitigable impact pertaining to the generation of GHG emissions during Project construction and operations was identified for the Proposed Project in Section 3.3 (*Greenhouse Gas Emissions*). Accordingly, a Partially Revised and Recirculated Draft EIR was prepared and circulated to government agencies, organizations, and interested individuals for a 45-day review period beginning on January 26, 2026 and ending on March 11, 2026. The LAHD received one comment letter on the Partially Revised and Recirculated Draft EIR during the public review period, from the American Soybean Association, which is presented below in Section 10.4 (*Organizations*).

The responses to comments provided herein contain the following information:

- First and foremost, the responses address the environmental concerns raised by the commenters, and describe how they are addressed in the document;
- They point to the adjusted methodologies used to recalculate Project emissions in the Partially Revised and Recirculated Draft EIR;
- They provide corrections to the text, where such corrections are warranted; and,
- They expand on or provide minor clarifications to information already included in the Draft EIR in those instances where comments question this information.

LAHD staff, therefore, find that this Final EIR, which encompasses the Draft EIR, Partially Revised and Recirculated Draft EIR, and all supporting studies, is adequate and supported by substantial evidence as required by CEQA.

10.3. State, Regional, and Local Governments

California Coastal Commission

Comment Letter

STATE OF CALIFORNIA - NATURAL RESOURCES AGENCY GAVIN NEWSOM, *Governor*

CALIFORNIA COASTAL COMMISSION

South Coast Area Office
301 E Ocean Blvd, Suite 300
Long Beach, CA 90802
(562) 590-5071

October 30, 2025

Lisa Wunder, Director of Environmental Management
Port of Los Angeles

SENT VIA ELECTRONIC MAIL

RE: Terminal Island Maritime Support Facility Project, Port of Los Angeles
Coastal Commission Staff Comments on Draft Environmental Impact Report

Lisa Wunder,

Thank you for the invitation to comment on the Draft Environmental Impact Report (EIR) for the Terminal Island Maritime Support Facility Project (project) at 740 Terminal Way in the Port of Los Angeles (Port). As described in the EIR, the project would be located within the Port's coastal development permit jurisdiction and subject to the requirements of the Port's Port Master Plan (PMP). Commission staff agree with the conclusion from the EIR that the proposed project would require a PMP amendment for the redesignation of the site's current land use designations of Container, Liquid Bulk, and Maritime Support to a dual land use designation of Container and Maritime Support.

As proposed, the project involves grading and paving of the approximately 80-acre site for construction and operation of a chassis support and container storage facility. The following comments and questions are intended to inform future environmental review, PMP amendment, and permitting for the proposed project to be consistent with the Coastal Act.

With the amount of hazardous soils identified in the EIR as being present on the project site from previous development, one question raised is the amount of hazardous soils that will be left unremediated by the proposed development of the site. The Port should assess whether residual contaminants in the soil could be susceptible to mobilization and impact water quality in the future as sea levels and groundwater levels may rise. Per the Port of Los Angeles PMP policy 2.1, the Port must address any potential water quality impacts that could occur during the anticipated design life of the project. **CCC-1**

Also relating to soils, it is important that the Port thoroughly reviews the sourcing and usage of sediment being removed or used in port projects. Any clean beach compatible material present on the project site should be preserved for use on beaches in the area that are threatened by sea level rise, and the development should avoid use of such material for fill or capping of this site. **CCC-2** Finally, the sediment that would be affected by ground disturbing activities should be analyzed for potential to contain archaeological, paleontological, and tribal cultural resources. California Native American Tribes should be consulted with to confirm potential presence of tribal cultural resources. If there is potential for the discovery of such resources, it is recommended to require Tribal cultural monitoring during construction activities. **CCC-3**

Please note that the comments provided herein are preliminary in nature. Coastal Commission staff requests notification of any future activity associated with this project to provide more specific comments as the project develops. Staff also recommends early coordination on any associated PMP Amendment. Thank you for the opportunity to comment on the Draft EIR. Please contact me at seth.villanueva@coastal.ca.gov with any questions.

Terminal Island Maritime Support Facility Project
Coastal Commission Staff Comments on Draft Environmental Impact Report
Page 2 of 2

Sincerely,

S Villanueva

Seth Villanueva
Coastal Program Analyst

Responses

Response to Comment CCC-1:

LAHD has completed soil, soil gas, and groundwater testing at the Project site and is consolidating historical data to determine if deeper sampling is needed. Under the Proposed Project, construction would involve routine site preparation, grading, excavation, and infrastructure and building construction, during which known or not previously identified contaminated soils, soil vapor, and/or groundwater not previously remediated may be encountered. As outlined in mitigation measure (MM) HAZ-1, preconstruction sampling and testing would be completed within the area of Project disturbance, and where Project buildings and structures would be built, allowing for implementation of the Soil Management Plan (SMP), which has been included as Appendix D to the Final EIR. These data will be analyzed with respect to estimated groundwater level rise in response to sea level changes to evaluate future impacts to water quality given the 25-year Term Permit.

Soils outside the area of Project disturbance would not be disturbed or remediated – this is an existing condition that is not related to the Project.

A review of the mapped sea level rise (SLR) scenarios – 12, 24, 37, and 66 inches – evaluated under two tide conditions: (1) daily high tide and (2) storm tide, shows that the Project site would not be inundated as a result of SLR and there would be no overtopping of the shoreline in the Project area (POLA, 2018 – Figure E-4). Therefore, no impacts related to SLR would occur. The maps also show low-lying areas (in green) which are below the mapped water surface elevation but remain hydraulically disconnected from the flood source and highlight possible vulnerability to stormwater ponding, elevated groundwater, and backflow into stormwater systems. Two such areas are within the loop, at the northeast corner and southwest corner; however, the loop would be covered with asphalt pavement as part of the Proposed Project limiting the potential for infiltration and mobilization of any residual soil contamination.

Response to Comment CCC-2:

Although the Proposed Project does not include dredging that could generate sediment or clean sand, site preparation would generate excess soil for export. MM-HAZ-1 includes a Project-specific SMP to outline the procedures for handling, storage, transport, reuse or disposal of contaminated soil (see Final EIR Appendix D). Implementation of the SMP would determine the proper reuse or disposal of impacted soil. In addition, the LAHD Environmental Management Division has conducted a qualitative assessment of the soil proposed to be removed from the Project site during remediation, and has determined that this soil is not suitable for beach replenishment due to grain size, etc. Port Master Plan Policy 3.3 requires the Port to consider all impacts involving filling in compliance with California Coastal Act 30705.

Response to Comment CCC-3:

The Notice of Preparation/Initial Study (NOP/IS) (Final EIR Appendix A) evaluated whether the Proposed Project would affect archaeological, paleontological, or tribal cultural resources. As documented in the NOP/IS, the Native American Heritage Sacred Lands File search conducted in 2022 was negative. The Port also conducted AB 52 tribal outreach in 2023. One response for consultation as received on January 20, 2023, from

the Gabrieleño Band of Mission Indians-Kizh Nation (Kizh Nation). Formal consultation with the Kizh Nation was initiated on February 21, 2023, during which the Port informed the Kizh Nation that the Project was located entirely on artificial fill soil. It was determined that no formal meeting was necessary, and consultation was concluded. Because the Project site is located on harbor dredged material and industrial-grade artificial fill, ground-disturbing activities would have no impact on archaeological, paleontological, or tribal cultural resources. Therefore, a more detailed analysis of these topics was not included in the Draft EIR and a tribal monitor during construction activities is unnecessary.

California Department of Transportation

Comment Letter

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY Gavin Newsom, Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 7- OFFICE OF REGIONAL PLANNING
100 S. MAIN STREET, SUITE 100
LOS ANGELES, CA 90012
PHONE (213) 266-3574
FAX (213) 897-1337
TTY 711
www.dot.ca.gov

Making Conservation a California Way of Life.

October 30, 2025

Director of Environmental Management
Los Angeles Harbor Department
425 S. Palos Verdes Street
San Pedro, CA 90731

RE: Terminal Island Maritime Support Facility Project – Draft Environmental Impact Report (DEIR)
SCH# 2023120181
GTS# 07-LA-2023-04902
Vic. LA 47 PM: 2.142

Dear Lisa Wunder,

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed Terminal Island Maritime Support Facility Project (Project) involves the development and operation of a chassis support facility on an approximately 89-acre site at 740 Terminal Way, San Pedro, CA 90731 at the Port of Los Angeles. The Project would construct and install office trailers, maintenance and repair facilities, chassis stalls, and appurtenant water and electrical infrastructure. The existing vacant Eldridge Street office building (750 Eldridge Street, San Pedro, CA 90731) would also be refurbished to support operations. The chassis support facility could be operated by multiple companies, each of which would likely conduct chassis support operations out of separately built infrastructure. While not certain at this time, it is assumed that up to four different companies could operate on the site at once; however, use of the site by a single operator would yield higher throughput. For the purposes of the California Environmental Quality Act (CEQA), the Project operations assume as a worst-case use of the Project site as a chassis support facility and ancillary empty wheeled container storage, operated by a single operator. The Draft EIR evaluates the Project as a facility that involves the storage, repair, and maintenance of chassis as well as the operation of supporting office space(s), including office trailers and the Eldridge Street office building. The Project would be operated for up to 25 years.

After reviewing the DEIR, Caltrans has the following comments:

Due to the project's adjacency to SR 47, please be aware that any project work occurring within, or abutting Caltrans ROW will require an encroachment permit, and all | **CALTRANS-1**

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concerns and requirements must be addressed. This includes any grading, topography, or equipment work that will change the pattern or direction of water runoff in a way that will impact State facilities or ROW. **CALTRANS-1 (cont'd)**

If evidence of the above is discovered during the Lead Agency's review of the project's various permit and design approvals, a condition of approval for issued entitlements shall include a requirement to work with Caltrans' Office of Permits to obtain the appropriate encroachment permits. Final design requirements for any proposed changes to infrastructure within or along Caltrans Right-of-way will be determined by the Office of Permits. At the time of permit application there will be rounds of review and corrections to ensure all design, Right-of-way, access management, water runoff, environmental, and statutory requirements are being addressed.

Caltrans District 7 Office of Permits contact information:
Mailing Address: 100 S Main Street, Ste 100 Los Angeles, CA 90012
Office Hours: 8:00 a.m. to 5:00 p.m. Monday-Friday
Phone: 213-897-3631 | Fax: 213-897-0420 | E-mail: D7.Permits@dot.ca.gov

Please also be aware that the Vincent Thomas Bridge (VTB) Deck Replacement Project is expected to be under construction from October 2025 to March 2027. If the Terminal Island Maritime Support Facility Project will be in construction at the same time as the VTB and/or other projects in the area, coordination with Caltrans and a traffic handling/detour study needs to be done to mitigate impacts. **CALTRANS-2**

Finally, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will require a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods. **CALTRANS-3**

If you have any questions, please contact project coordinator Anthony Higgins, at anthony.higgins@dot.ca.gov and refer to GTS# 07-LA-2023-04902.

Sincerely,

Miya Edmonson

Miya Edmonson
LDR Branch Chief

Cc: State Clearinghouse

"Provide a safe and reliable transportation network that serves all people and respects the environment"

Responses

Response to Comment CALTRANS-1:

Table 2-1 of the Final EIR has been revised to identify Caltrans' role as the permitting authority for an Encroachment Permit for any Project work occurring within the Caltrans ROW for SR 47.

Response to Comment CALTRANS-2:

Table 4-1 of the Final EIR has been revised to update the anticipated construction schedule for the Vincent Thomas Bridge Deck Replacement Project. As construction of the Proposed Project is likely to overlap with the Vincent Thomas Bridge Deck Replacement Project, LAHD shall perform all necessary coordination with Caltrans. LAHD has been coordinating closely with Caltrans (including issuance of permits to Caltrans) on their traffic management plan for the planned construction on the Vincent Thomas Bridge from 2026 to 2029.

Response to Comment CALTRANS-3:

LAHD would obtain all necessary permits for the transport of oversized vehicles on State highways. LAHD acknowledges Caltrans' recommendation for large-sized trucks to utilize State highways during off-peak commute periods to the maximum extent feasible.

California Air Resources Board

Comment Letter

CALIFORNIA AIR RESOURCES BOARD

Gavin Newsom, Governor
Yana Garcia, CalEPA Secretary
Lauren Sanchez, CARB Chair

October 24, 2025

Uriel de los Reyes
Environmental Specialist
Los Angeles Harbor Department
Port of Los Angeles
425 South Palos Verdes Street
San Pedro, CA 90731
udelosreyes@portla.org

Sent via email

Dear Uriel de los Reyes:

Thank you for providing the California Air Resources Board (CARB) with the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Terminal Island Maritime Support Facility Project (Project), State Clearinghouse No. 2023120181. The Project is located within the Port of Los Angeles (Port), which is the lead agency for California Environmental Quality Act (CEQA) purposes.

The Project consists of the construction and operation of a chassis support facility on an approximately 89-acre site in the Port. The Project includes the construction of office and welfare buildings, canopy structures, restrooms, guard booths, maintenance and repair facilities, chassis parking areas, and supporting utility infrastructure. The existing Eldridge Street office building, located within the Project site, would be refurbished for operational use. The facility would support chassis storage, repair, and maintenance activities, as well as related office functions, for up to 25 years. The Project could serve up to an estimated 3,682 and 6,838 truck trips per day, under opening year (year 2027) and year 2046 conditions, respectively. The Port claims these are not new truck trips.

Residences are located to the east of the Project site, with the closest residence located within 6,000 feet of the Project's eastern boundary. In addition to residences, Cabrillo Avenue Elementary School, Mary Star of the Sea Elementary School, and Port of Los Angeles High School are located within a mile of the Project. These residences and schools are located within boundaries of the Wilmington, Carson, West Long Beach community (WCWLB) which is a designated disadvantaged community[1] and was selected for the Community Air Protection Program under Assembly Bill (AB) 617 (C. Garcia, Chapter 136,

[1] A disadvantaged community is defined as an area disproportionately affected by environmental pollution and other hazards that can lead to negative public health effects, exposure, or environmental degradation. (California Health and Safety Code section 39711, subdivision (a).)

Statutes of 2017)[2] because of high cumulative exposure to air pollution. AB 617 requires CARB and air districts to take actions to reduce these exposures and improve air quality. To date, CARB and air districts have invested a cumulative total of 3.7 billion dollars to implement community identified air quality priorities.

To protect the health of the community and nearby sensitive receptors (e.g., residents and school students),[3] CARB urges the Port to (1) provide substantial evidence demonstrating that Project operations will not increase heavy-duty truck activity beyond baseline conditions, (2) substantiate the assumptions used in the DEIR regarding the average 1.87-mile diversion trip distance and the 20-mile heavy-duty truck trip distance during the Project's grading phase, and (3) include a new mitigation measure or project design feature requiring the phased adoption of zero-emission drayage trucks serving the Project.

The Project Must Evaluate the Impact of Increased Exposure to Air Pollution in a Disadvantaged Community

CARB-1

California has committed to address cumulative air quality impacts in communities already facing high pollution burdens, such as the one surrounding the Project, and has adopted legislation to achieve this commitment. AB 617 was signed into law in 2017, and CARB established the Community Air Protection Program to translate AB 617 into action. AB 617 (beginning in 2017), along with additional legislation, AB 197 in 2016, and AB 1749 (beginning in in 2022), requires CARB and air districts to develop and implement emissions reporting and monitoring, and to create plans to reduce exposures and emissions in the communities that are the most impacted by poor air quality– these plans are known as Community Emission Reduction Programs (CERPs).

The California Environmental Protection Agency (CalEPA) is responsible for identifying disadvantaged communities based on geographic, socioeconomic, public health, and environmental hazard criteria. Using the California Communities Environmental Health Screening Tool (CalEnviroScreen 4.0), CalEPA defines disadvantaged communities as those ranking within the top 25% of census tracts most burdened by pollution and socioeconomic stressors. The Project site is located in a census tract with a CalEnviroScreen 4.0 score of 99%, placing it among the most highly impacted areas in the state.

Due to its high cumulative pollution burden, CARB selected WCWLB community to be a part of the Community Air Protection Program and to write a CERP to reduce air pollution

[2] Assembly Bill 617, Garcia, C., Chapter 136, Statutes of 2017, modified the California Health and Safety Code, amending § 40920.6, § 42400, and § 42402, and adding § 39607.1, § 40920.8, § 42411, § 42705.5, and § 44391.2.
[3] California Health and Safety Code Section 42705.5, subdivision (a)(5): *leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=42705.5.&lawCode=HSC*

within the community. This Project is within the borders of Wilmington, West Long Beach, and Carson CERP.[4] **CARB-1 (cont'd)**

The WCWLB CERP Steering Committee identified its primary concerns as emissions from Refineries, Ports, Neighborhood Truck Traffic, Oil Drilling and Production, and Railyards. To address these concerns, particularly neighborhood truck traffic, the CERP prioritizes reducing emissions from idling heavy-duty diesel trucks and diesel-powered equipment at freight facilities. The CERP includes several incentive projects to reduce the impact of heavy-duty trucks, including incentives to help replace diesel powered trucks with zero- and near-zero emission technology.

To protect the health of people living, working, and attending school in the WCLCB community, the applicant must evaluate the impact of all foreseeable uses for the entire Project area and ensure that its land use decisions, including its decision on this Project, are consistent with the WCWLB CERP in its entirety.

The Port Must Include Substantial Evidence that the Project Would Not Increase Truck trips **CARB-2**

The Port does not provide substantial evidence in the DEIR demonstrating that the Project would not increase heavy-duty truck trips traveling to and from the Port. As stated in Chapter 2.5.3 (Operation) of the DEIR, the proposed chassis yard would "serve up to an estimated 3,682 33 and 6,838 truck trips per day, under opening year (year 2027) and year 2046 conditions, respectively."[5] These projected truck volumes represent a substantial level of heavy-duty vehicle activity that could exacerbate air pollution exposures in nearby communities already burdened by some of the highest cumulative concentrations of diesel particulate matter (diesel PM) and nitrogen oxides (NOx).

The DEIR asserts that Project operations would not generate new truck activity but would rather result in a "minor geographic diversion of existing bobtails, as trips are already occurring within the complex."[6] However, this conclusion is unsupported by substantiating evidence. The DEIR does not present any baseline truck trip data, quantitative traffic counts, or modeling results demonstrating that total heavy-duty truck volumes within the Port complex would remain constant following Project implementation. In the absence of a

[4] South Coast Air Quality Management District, Community Emissions Reduction Plan. 2019. Accessible at: *http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2019/2019-sep6-025c.pdf?sfvrsn=6*
[5] Port of Los Angeles. Terminal Island Maritime Support Facility Project. September 2025. Page 2-11. Accessible at *https://kentico.portoflosangeles.org/getmedia/4b91ce71-500e-4e6b-acd8-bcd90d9941ea/Maritime-Support-Facility-DEIR-2-0-Project-Description*
[6] Port of Los Angeles. Terminal Island Maritime Support Facility Project. September 2025. Page 2-11. Accessible at *https://kentico.portoflosangeles.org/getmedia/4b91ce71-500e-4e6b-acd8-bcd90d9941ea/Maritime-Support-Facility-DEIR-2-0-Project-Description*

comprehensive, data-driven analysis of current and projected truck activity, the assumption of trip diversion cannot be independently verified. CARB-2 (cont'd)

Given that heavy-duty trucks are the dominant source of operational air pollutant emissions associated with the Project, it is critical that the Final Environmental Impact Report (FEIR) provide substantial evidence demonstrating that the Project will not result in a net increase in total truck trips within the Port area.

The Trip Length Distances Used to Estimate the Project Air quality Impact are Unsubstantiated CARB-3

The Project's construction and operational mobile source air pollutant emissions may have been underestimated in the DEIR by using vehicle trip lengths unsupported by substantial evidence. For construction, the DEIR assumes that haul trucks exporting approximately 270,000 cubic yards of soil during the grading phase would travel a 20-mile one-way distance, which reflects a default parameter in the California Emissions Estimator Model (CalEEMod); rather than project-specific data. The DEIR provides no documentation identifying the landfill or disposal sites where the soil would be transported. Without this information, it cannot be determined whether the 20-mile assumption reasonably represents real-world conditions or whether longer hauls are more likely.

For operations, the DEIR assumes that approximately 3,682 daily heavy-duty truck trips serving the proposed Project in the opening year would travel an off-site "diversion distance" of 1.87 miles. This distance was derived from the unverified assumption that these trips would represent a "geographic diversion" of existing heavy-duty truck activity within the San Pedro Bay Ports complex, rather than newly generated truck trips. However, the DEIR provides no data or analytical evidence demonstrating that this assumption accurately reflects actual truck routing or operational patterns. In practice, travel distances between marine terminals and the proposed facility could vary significantly and, in many cases, exceed 1.87 miles, depending on terminal location and roadway configuration. CARB-4

By relying on default and unsubstantiated trip distance assumptions, the DEIR may have underestimated the Project's mobile-source air pollutant emissions. To fully disclose potential air quality impacts, the FEIR should provide substantial evidence supporting both the construction and operational heavy-duty truck travel distances used in the Project's air quality analysis. If further analysis determines that haul or diversion distances are greater than those assumed in the DEIR, the Port must remodel the Project's construction and operational air quality impacts using updated trip length distances and present the revised results in the FEIR.

The Port Must Include Meaningful Mitigation Measures to Reduce the Project's Impact on Air quality

CARB-5

The Port concluded in Chapter 3.1 (Air Quality and Health Risk) of the DEIR that the operation of the Project would result in a significant impact on air quality. According to Table 3.1-7 (Maximum Daily Unmitigated Operation Emissions, Regional Thresholds), the operation of the fully built Project would emit approximately 73 pounds per day of NOx, which was found to exceed the South Coast Air Quality Management District's (SCAQMD) threshold for significant impact on air quality. To mitigate the Project's operational air quality impact, the DEIR included MM AQ-1 (Zero-Emission Cargo-Handling Equipment). MM AQ-1 requires the tenant to use zero-emission cargo-handling equipment (CHE) at the start of Project operations. The mitigation measure states that if specific CHE types are determined to be infeasible due to operational or infrastructure constraints, the tenant must submit a written feasibility report within 90 days, which will be reviewed and agreed upon by the Board of Harbor Commissioners. After the implementation of MM AQ-1, the Port concluded in the DEIR that the Project's air quality impact would still result in a significant and unavoidable impact under CEQA.

CARB appreciates the inclusion of Mitigation Measure MM AQ-1 in the DEIR; however, the Port must strive to include additional measures to further reduce air pollutant emissions and protect nearby communities. Drayage trucks are among the largest sources of diesel PM and NOx in the region and contribute significantly to localized air quality and health impacts in surrounding neighborhoods. To minimize these impacts, CARB urges the Port to incorporate a new mitigation measure or project design feature in the FEIR that mandates a phased transition to an all zero-emission drayage fleet. This measure should include provisions for installing on-site zero-emission fueling or charging infrastructure and ensuring adequate capacity to support zero-emission truck operations.

In Chapter 3.1 (Air Quality and Health Risk) of the DEIR, the Port acknowledges CARB's Advanced Clean Trucks and Advanced Clean Fleets "may lead to accelerated turnover of older trucks, as electric or other zero-emission models of heavy-duty vehicles become available to the market in the future."[7] The DEIR further notes that, depending on the availability of these technologies and the enforcement of the regulations, a growing fraction of the regional truck fleet could become zero-emission prior to the Project's buildout year. Despite this recognition, the DEIR concludes that "controlling truck technologies is not a feasible mitigation."[8]

[7] Port of Los Angeles. Terminal Island Maritime Support Facility Project. September 2025. Page 3.1-19. Accessible at *https://kentico.portoflosangeles.org/getmedia/2b24c617-5196-486d-9322-b36799fe5a47/Maritime-Support-Facility-DEIR-3-1-Air-Quality-and-Health-Risk*

[8] Port of Los Angeles. Terminal Island Maritime Support Facility Project. September 2025. Page 3.1-19. Accessible at *https://kentico.portoflosangeles.org/getmedia/2b24c617-5196-486d-9322-b36799fe5a47/Maritime-Support-Facility-DEIR-3-1-Air-Quality-and-Health-Risk*

CARB respectfully disagrees with this conclusion. The DEIR's acknowledgment of these statewide regulations and emerging market trends demonstrates that the transition to zero-emission drayage trucks is both foreseeable and achievable within the Project timeframe. The Port has both the authority and opportunity to require project-specific commitments that align with these statewide initiatives and accelerate emission reductions in a community already burdened by diesel PM. **CARB-5 (cont'd)**

A list of commercially available zero-emission trucks can be obtained from the Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project (HVIP).[9] The HVIP is a part of California Climate Investments to incentivize the purchase of zero-emission trucks. Based on CARB's review of the zero-emission trucks listed in the HVIP, there are commercially available electric trucks that can meet the freight transportation needs of individual industrial uses under the proposed Project today.

In addition to the mitigation modifications recommended above, the Port should add the air pollutant emission reduction measures listed below in the FEIR. **CARB-6**

- In construction contracts, include language that requires all heavy-duty trucks entering the construction site during the grading and building construction phases be model year 2014 or later. All heavy-duty haul trucks should also meet CARB's lowest optional low-NOx standard starting in the year 2022.[10]
- Include contractual language in tenant lease agreements restricting trucks and support equipment from idling longer than two minutes while on site.

Conclusion

CARB remains concerned about the Project's potential air quality impacts on nearby residents and schools within the WCWLB community. The Port has a critical responsibility to ensure that the Project does not further burden these communities with toxic air pollution. To adequately assess and mitigate the Project's impacts, the FEIR must provide substantial evidence demonstrating that Project operations will not increase heavy-duty truck activity beyond baseline conditions. In addition, the Port should substantiate the assumptions used in the DEIR regarding the average 1.87-mile diversion trip distance and the 20-mile heavy-duty truck trip distance during the Project's grading phase. Finally, CARB strongly recommends that the FEIR include a new mitigation measure or project design feature

[9] Zero-Emission Truck and Bus Voucher Incentive Project. Accessible at: *https://californiahvip.org/*
[10] In 2013, CARB adopted optional low-NOx emission standards for on-road heavy-duty engines. CARB encourages engine manufacturers to introduce new technologies to reduce NOx emissions below the current mandatory on-road heavy-duty diesel engine emission standards for model-year 2010 and later. CARB's optional low-NOx emission standard is available at: *https://ww2.arb.ca.gov/our-work/programs/optional-reduced-nox-standards*

requiring the phased adoption of zero-emission drayage trucks serving the Project to minimize exposure to harmful diesel PM emissions in nearby communities.

Given the breadth and scope of projects subject to CEQA review throughout California that have air quality and greenhouse gas impacts, coupled with CARB's limited staff resources to substantively respond to all issues associated with a project, CARB must prioritize its substantive comments here based on staff time, resources, and its assessment of impacts. CARB's deliberate decision to substantively comment on some issues does not constitute an admission or concession that it substantively agrees with the lead agency's findings and conclusions on any issues for which CARB does not submit substantive comments.

CARB appreciates the opportunity to comment on the DEIR for the Project and can provide assistance with emission reduction strategies, as needed. Please include CARB on your list of selected State agencies that will receive the FEIR. If you have questions, please contact Stanley Armstrong, Air Pollution Specialist, via email at *stanley.armstrong@arb.ca.gov*

Sincerely,



Matthew O'Donnell, Chief, Risk Reduction Branch

cc: State Clearinghouse
state.clearinghouse@lci.ca.gov

Sam Wang, Program Supervisor- CEQA IGR, South Coast Air Quality Management District
swang1@aqmd.gov

Alejandro (Alex) Sanchez, Air Pollution Specialist, Risk Reduction Branch

Stanley Armstrong, Air Pollution Specialist, Risk Reduction Branch

Responses

Response to Comment CARB-1:

CARB identifies that the Proposed Project is in an area of high cumulative pollution burden and within the borders of the Wilmington, Carson, West Long Beach Community Emissions Reduction Plan (CERP). However, as an introduction to this comment, CARB incorrectly states that there are residences within 6,000 feet of the Project's eastern boundary. East of the Project site is the West Basin and Long Beach Middle Harbor in the Port of Long Beach. The Draft EIR identifies closer sensitive receptors as liveaboards at marinas located 1 mile north. Residences west of the Project site in San Pedro are at least 1.1 miles away. Because the residential portion of San Pedro was described in Draft EIR Section 3.1.2 (*Environmental Setting*), as 1.3 miles away, the Final EIR includes revisions to reflect the shorter distance. Draft EIR Section 3.1.2 (*Environmental Setting*), also identified existing land uses within a 1,000-foot radius of the Project site to identify sensitive receptors based on City of Los Angeles, Department of City Planning (City of Los Angeles, 2019), and CARB (CARB, 2005) recommendations for the separation of sensitive land uses from freeways, high-traffic roads, and distribution centers. Section 3.1.2 (*Environmental Setting*), of the Final EIR has been revised to clarify the names of the nearest schools and proximity of San Pedro neighborhoods, which are located more than 1 mile from the Project site.

Draft EIR Section 3.1 (*Air Quality and Health Risk*), Impact AQ-6 reviews Project consistency with *Chapter 5c: Ports*, of the September 2019 Final CERP (SCAQMD, 2019). The Proposed Project was found to be consistent with the CERP based on the air quality priorities identified for the Ports. With the design of the Proposed Project including PF AQ-1 (*Zero-Emissions Operational Equipment*) and MM AQ-1 (*Zero-Emissions Cargo-Handling Equipment*), and with Clean Truck Program requirements in place for trucks accessing the site, no conflict would occur with the priorities of the CERP (SCAQMD, 2019). The CERP does not govern land use decisions, and land use authority is governed within the Port Master Plan, which includes the land use designation that is compatible for this Project. There are no other reasonably foreseeable uses identified within this Project footprint. No further analysis is necessary.

Response to Comment CARB-2:

The Draft EIR relied on travel forecasting by LAHD Goods Movement Division (GMD) for heavy-duty truck travel patterns, including the changes in travel patterns that could occur with the Proposed Project. By nature of being a proposed chassis yard, the Project itself would not increase truck trips or create a new origin or destination for truck trips. Rather, the Project would divert existing trucks to frequent the Project site as opposed to other existing locations as described in Draft EIR Section 2.5.3 (*Operation*). Stated differently, there is no substantial evidence to support an assumption that overall truck trips would potentially increase by nature of creating additional chassis/container storage space and ancillary uses. This is because the number of containers and resulting truck trips are driven by TEUs, not storage.

To illustrate this further, under 'No Project' conditions, bobtails would travel directly to a container terminal to retrieve a chassis, have an import or empty container placed onto the chassis, and then transport this container to a facility outside the Port Complex. With the Proposed Project, the same bobtail would first stop at the Project site to obtain a chassis, then would travel to the terminal to retrieve a container, and finally would

transport the container to its destination facility. As such, the Project is an ancillary use in the truck drayage operations that does not produce a unique new truck trip. Impact AQ-3 in the Final EIR Section 3.1.5 (*Impact Analysis*), has been revised to clarify the source of data used for travel forecasting and the change in truck trip lengths as a result of trip diversions.

Response to Comment CARB-3:

The Draft EIR recognizes that soil contamination exists at varying degrees and handling, managing, and transport of soil would depend on additional site characterization, including study required by mitigation measure (MM) HAZ-1. Prior investigation of the site indicates generally low levels of contamination (LAHD, 2017). Accordingly, the excavation design reflects that most of the soils would be non-hazardous under both state and federal law. Site delineation and additional data collection within the Project site would determine any portions of exported soil requiring disposal at a Port-approved Class 1 hazardous waste facility.

In response to CARB's comment and to quantify emissions from the potential for longer hauling distances needed for treatment and disposal of contaminated soils, the Partially Revised and Recirculated Draft EIR reflected new assumptions for hauling trip lengths during site preparation. Specifically, approximately 20 percent of haul truck travel are assumed to be up to 200 miles to either the Class I Buttonwillow or Kettleman Hills hazardous waste disposal facilities in the San Joaquin Valley, and the remaining 80 percent would be likely to find a Class II or III disposal site within 50 miles of Terminal Island (e.g., to Azusa); reuse of soil onsite is not accounted for in analysis of truck trips. The revised assumptions presented in the Partially Revised and Recirculated Draft EIR (Impact AQ-1) and this Final EIR include up to 100 daily round trips for haul trucks during soil export. On this basis, the air pollutant and GHG emissions estimates in Final EIR Section 3.1 (*Air Quality and Health Risk*), and Section 3.3 (*Greenhouse Gas Emissions*), have been revised to reflect the potential for soil exports to travel an average distance of 80 miles per one-way trip. This updated analysis was presented in the Partially Revised and Recirculated Draft EIR and are reflected in Section 3.1 (*Air Quality and Health Risk*) and Section 3.3 (*Greenhouse Gas Emissions*) of this Final EIR.

Response to Comment CARB-4:

The EIR (Draft EIR and Partially Revised and Recirculated Draft EIR) quantifies emissions during Project operations as caused by heavy-duty truck trips. The quantification includes three components: off-site travel, on-site travel, and on-site idling. With respect to the incremental distance of off-site travel caused by diverting existing vehicles into the Project site, the travel forecasting by LAHD GMD considers the changes in travel patterns that could occur with the Proposed Project. The analysis from LAHD GMD considered changes in vehicle-miles traveled for detouring inbound and outbound Project trips between the Port terminals and the surrounding region and determined that the average potential change in vehicle miles traveled would be 1.87 miles per one-way trip. To conservatively determine the Project-related changes in vehicle miles traveled, the LAHD GMD analysis does not take credit for or quantify the benefit of reducing inefficient truck trips. The calculations supporting the LAHD GMD estimation appear in the administrative record (LAHD, 2023).

The Partially Revised and Recirculated Draft EIR reevaluated the internal circulation based on the preliminary site plan, the grade separation design, and potential need for

idling to arrive at greater levels of on-site emissions than shown in the Draft EIR. As a result, the severity of an existing significant, unavoidable impact (Impact AQ-3) in Section 3.1 (*Air Quality and Health Risk*) was increased, and a new potentially significant but mitigable impact (Impact GHG-1) in Section 3.3 (*Greenhouse Gas Emissions*) was identified in the Partially Revised and Recirculated Draft EIR. Two additional impacts (Impact AQ-4 and Impact AQ-5) in Section 3.1 (*Air Quality and Health Risk*) were revised to show the increased emissions, but impacts remain less than significant. Impact AQ-3 in the Final EIR Section 3.1.5 (*Impact Analysis*), has been revised to clarify the source of data used for travel forecasting and the change in truck trip lengths as a result of trip diversions. No additional analysis is needed.

See also Response to Comment CARB-2 regarding the numbers of trips.

Response to Comment CARB-5:

As described in Draft EIR Section 3.1 (*Air Quality and Health Risk*), Impact AQ-3, controlling truck technologies (such as requiring a phased transition to an all zero-emission drayage fleet) is not a feasible mitigation measure and furthermore, the Port does not have the legal authority to mandate a phased transition to an all zero-emission drayage fleet for the Project which would interfere with the price, route, and service of non-zero-emission trucks, and would likely be preempted by the Federal Aviation Administration Authorization Act (See 49 USC Section 14501, subd. (c)(1)).

Mandating the use of a particular technology in drayage service at a single facility is also legally and technically infeasible. Neither LAHD nor prospective tenant(s) would own or control the drayage trucks that would utilize the proposed maritime support facility (MSF). The Port acknowledges the availability of the Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project; however, requiring and enforcing all third-party drayage truck operators to participate in this program would be outside the scope of the Proposed Project.

The CAAP acknowledges that trucks remain a significant source of air pollution and has committed the Ports to a goal of transitioning the drayage fleet to zero-emissions technologies by 2035. This is an aggressive goal and will require substantial effort and financial support by all parties involved – the ports, the regulatory agencies, the drayage industry, and the truck manufacturing industry – because the issue must be addressed on a port-wide basis, not a project-by-project basis. The CAAP requires the Ports to periodically review the deployment status of commercially available zero-emission trucks for drayage and charging infrastructure. As acknowledged in the most recent 2024 Update: Feasibility Assessment for Drayage Trucks, significant progress has occurred since 2018 with the commercialization of zero-emission drayage trucks and improved infrastructure for charging and refueling, but there is still a long way to go to achieve full market maturity and widespread adoption (San Pedro Bay Ports, 2025). Partially Revised and Recirculated Draft EIR Section 3.1.4 (*Impacts and Mitigation Measures*) notes that the statewide Advanced Clean Trucks and Advanced Clean Fleets regulations are not yet enforceable, and widespread adoption of zero-emissions technologies remains challenging in this regulatory context. The Final EIR also points out that PF AQ-1 (*Zero-Emission Operational Equipment*) and MM AQ-1 (*Zero-Emission Cargo-Handling Equipment*) would result in the incorporation of zero-emissions technologies into the Project's operational equipment by January 1, 2030, and modified those measures to provide more certainty in their implementation. The EIR also notes that tenants responsible for operations would not likely own or control the truck fleets of future

customers using the site. Therefore, the Proposed Project would not have control over the technology or composition of the truck fleet that would use the facility. No revisions are needed.

Response to Comment CARB-6:

The comment suggests additional project-specific mitigation for inclusion in the construction contracts and in tenant lease agreements. The Proposed Project construction emissions would not exceed applicable thresholds, and accordingly, the Draft EIR did not identify a need for mitigation of on-road heavy-duty trucks used during construction. Upon reviewing the recommendations, LAHD considered CARB's recommendation to require use of lower emitting haul trucks. The LAHD standard Site Construction Performance Requirements include provisions to require that on-road trucks used during construction meet or exceed CARB on-road vehicle emission requirements, and backup documentation requirements will be incorporated with construction contracts issued by LAHD. As part of a best management practice in Project approval, LAHD may also consider adding fleet modernization requirements; for example, requiring trucks used on site or to transport materials to and from the site to comply with 2015 emission standards, or newer, where available. Additional mitigation for construction phase emissions would not be necessary. Across all operations, the LAHD encourages restricting idling of heavy-duty vehicles, and this is a standard provision of tenant lease agreements. Although enforcement of specific idling limits is not feasible, terminals normally require engines to be turned off during roadability inspections (WBCT, 2025). No revisions to the EIR are needed.

Department of Toxic Substances Control

Comment Letter

Department of Toxic Substances Control

Yana Garcia
Secretary for
Environmental Protection

Katherine M. Butler, MPH, Director
8800 Cal Center Drive
Sacramento, California 95826-3200
dtsc.ca.gov

Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

October 22, 2025

Uriel de los Reyes
Environmental Specialist
Port of Los Angeles
425 S Palos Verdes Street
San Pedro, CA 90731
udelosreyes@portla.org

RE: DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE TERMINAL ISLAND MARITIME SUPPORT FACILITY PROJECT DATED SEPTEMBER 15, 2025, STATE CLEARINGHOUSE NUMBER 2023120181

Dear Uriel de los Reyes,

The Department of Toxic Substances Control (DTSC) reviewed the Draft Environmental Impact Report (DEIR) for the Terminal Island Maritime Support Facility Project (Project). The proposed Project involves the development and operation of a chassis support facility on an approximately 89-acre site at 740 Terminal Way, San Pedro, CA 90731 at the Port of Los Angeles. The Project would construct and install office trailers, maintenance and repair facilities, chassis stalls, and appurtenant water and electrical infrastructure. The existing vacant Eldridge Street office building (750 Eldridge Street, San Pedro) would also be refurbished to support operations. DTSC recommends and requests consideration of the following comments:

1. The proposed Project is located in the vicinity of the former Long Beach Naval Complex (LBNC). Perfluoroalkyl and polyfluoroalkyl substance (PFAS) investigation is ongoing at the former LBNC. Substantial PFAS was detected in the groundwater below the former LBNC. Because fuel tank farm and storage were located at the Project site, testing for PFAS must be included in the Mitigating Measures section.

DTSC-1

2. In addition, Naval Air Base was located on Terminal Island. Based on the information available in EnviroStor, ordinance and explosive materials were stored in four separate buildings or sheds along the seaplane lagoon. The site also housed a machine-gun butt and skeet range. DTSC recommends performing additional research on the Naval Air Base boundaries in relation to the Project site. Although it is not anticipated that munitions, munitions debris, or other explosive hazards associated with the Naval Air Base site will be identified within the boundaries of the Project site, DTSC recommends performing additional research on the Formerly Used Defense Sites (FUDS) boundaries in relation to the Project site. Should a suspected military munition be encountered at the Project site: **DTSC-2**

    a. **Recognize** that munitions are dangerous;
    b. **Retreat** do not approach, touch, move or disturb it, but carefully leave the area; and,
    c. **Report** immediately what you saw and where you saw it to local law enforcement — call 911.

3. The Port of Los Angeles should prepare a health and safety plan for the construction workers protection; transport excavated excess soil for treatment and disposal at an appropriately permitted landfill and not transport soil to a residential development for reuse as fill material. **DTSC-3**

4. The Port of Los Angeles must follow DTSC advisory for testing imported fill material to prevent a new source of soil contamination. If previously not found underground storage tanks or discolored soil is encountered during grading activities, the Port of Los Angels must notify DTSC. All imported soil/fill material should be tested to assess any contaminants of concern meet screening levels as outlined in DTSC's Preliminary Endangerment Assessment Guidance Manual. **DTSC-4**

   Additionally, DTSC advises referencing the DTSC Information Advisory Clean Imported Fill Material Fact Sheet if importing fill is necessary. To minimize the possibility of introducing contaminated soil/fill material there should be documentation of the origins of the soil/fill material and, if applicable, sampling be **DTSC-5**

conducted to ensure that the imported soil/fill material are suitable for the intended land use. The soil sampling should include analysis based on the source of the fill and knowledge of prior land use. Additional information can be found by visiting DTSC's Human and Ecological Risk Office (HERO) webpage.

DTSC-5 (cont'd)

DTSC would like to thank you for the opportunity to comment on the DEIR for the Terminal Island Maritime Support Facility Project. Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances. If you have any questions regarding these comments, please contact us via our CEQA Review email.

Sincerely,

Tamara Purvis

Tamara Purvis
Associate Environmental Planner
HWMP - Permitting Division – CEQA Unit
Department of Toxic Substances Control
Tamara.Purvis@dtsc.ca.gov

cc: (via email)

Governor's Office of Land Use and Climate Innovation
State Clearinghouse
state.clearinghouse@lci.ca.gov

Lisa Blewitt
Project Manager / Consulting Firm
Aspen Environmental Group
lblewitt@aspeneg.com

Irena Edwards
Environmental Scientist
SMRP – Cleanup - Cypress
Department of Toxic Substances Control
Irena.Edwards@dtsc.ca.gov

Christie Bautista
Senior Environmental Scientist (Supervisor)
SMRP – Cleanup - Cypress
Department of Toxic Substances Control
Christie.Bautista1@dtsc.ca.gov

Uriel Reveles
Engineering Geologist
SMRP – Cleanup – Chatsworth
Department of Toxic Substances Control
Uriel.Reveles@dtsc.ca.gov

Dave Kereazis
Associate Environmental Planner
HWMP-Permitting Division – CEQA Unit
Department of Toxic Substances Control
Dave.Kereazis@dtsc.ca.gov

Scott Wiley
Associate Governmental Program Analyst
HWMP - Permitting Division – CEQA Unit
Department of Toxic Substances Control
Scott.Wiley@dtsc.ca.gov

Responses

Response to Comment DTSC-1:

The commenter notes that the Project site is near the former Long Beach Naval Complex (LBNC), where an ongoing investigation has detected perfluoroalkyl and polyfluoroalkyl substance (PFAS) in groundwater at the former LBNC. The commenter states that given the historical presence of fuel storage and tank farms at the Project site, PFAS testing should be included in the mitigation measures section of the Final EIR.

The Port would conduct PFAS testing at the Project site in accordance with DTSC's comment. MM HAZ-1 has been revised to specify PFAS testing as part of its requirements for characterization of soil, soil vapor, and groundwater contamination within the Project site.

Response to Comment DTSC-2:

The commenter notes that the Naval Air Base was located on Terminal Island and that EnviroStor indicates the presence of ordnance and explosive materials. The commenter requests additional research to confirm the boundaries of the Naval Air Base in relation to the Project site. The commenter notes that munitions or explosive hazards are not expected on the Project site but recommends further research on the Formerly Used Defense Sites (FUDS) boundaries relative to the Project site. The commenter requests that procedures be in place in the event a suspected military munition is encountered during Project activities and includes specific recommended procedures.

Draft EIR Section 3.4.2 (*Environmental Setting*) states that the Naval Air Base is mapped within the Project site and covers the Project area. The Final EIR has been updated to include additional information regarding the FUDS boundaries in relation to the Project site, specifically Naval Air Base and the Former Long Beach Naval Complex. The Port is not aware of any ordnance or explosive materials at the Project site; however, the Final EIR has been updated to include procedures to follow if such materials are encountered.

Additionally, the Final EIR has been revised to incorporate information from the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Five-Year Review regarding environmental cleanup activities at the Former LBNC located approximately 1,200 feet east of the eastern boundary of the Project site.

Response to Comment DTSC-3:

The commenter requests a health and safety plan for construction workers and proper treatment and disposal of excavated soil at permitted facilities, with no reuse for residential purposes.

Construction bid specifications for Port projects include a requirement for a health and safety plan. The Final EIR has been updated to state that the Project's bid specifications would require a health and safety plan and appropriate disposal of the excavated soil with no reuse for residential purposes.

Response to Comment DTSC-4:

The commenter requests that POLA follow DTSC guidance for testing imported fill to prevent introducing contaminated soil. The commenter requests that DTSC be notified if unknown underground storage tanks or discolored soil are found during grading. The

commenter states that all imported fill should be tested for contaminants per DTSC's *Clean Imported Fill Material Fact Sheet* (DTSC, 2001) and *Preliminary Endangerment Assessment Guidance Manual* (DTSC, 2015). The commenter states that the Port should document the origin of all imported soil and conduct sampling based on the source and prior land use to ensure suitability.

The Proposed Project and alternatives do not include importing fill material to the site. The Final EIR has been updated to clarify that the Project would comply with both LAHD's Import Fill Guidance, which is based on DTSC's Information Advisory Clean Imported Fill Material Fact Sheet (DTSC, 2001), and the screening level requirements of DTSC's Preliminary Endangerment Assessment Guidance Manual (DTSC, 2015). The Final EIR has also been updated to state that LAHD would notify DTSC immediately if previously unknown underground storage tanks, discolored soil, or other indications of potential contamination are encountered during grading or excavation activities.

Response to Comment DTSC-5:

As discussed in Response to Comment DTSC-4, the Proposed Project would not involve the import of fill material.

South Coast Air Quality Management District

Comment Letter

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:
ceqacomments@portla.org
udelosreyes@portla.org
Uriel de los Reyes, Environmental Specialist
Los Angeles Harbor Department
425 S. Palos Verdes Street
San Pedro, CA 90731

October 30, 2025

Draft Environmental Impact Report (EIR) for the Proposed Terminal Island Maritime Support Facility Project (Proposed Project) (SCH No.: 2023120181)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The City of Los Angeles Harbor Department 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, organized by topic of concern.

Summary of Project Information in the Draft EIR

Based on the Draft EIR, the Proposed Project involves the improvement and expansion of approximately 89.2 acres, including approximately 73 acres of chassis/empty wheeled container storage that could potentially be used by 12 container terminals located in the Ports of Los Angeles and Long Beach.[1] Specifically, the Proposed Project would construct and install up to two office/welfare buildings, four canopy structures, eight restrooms, eight guard booths, maintenance and repair facilities, chassis stalls, appurtenant water and electrical infrastructure, and refurbish the existing vacant Eldridge Street office building.[2] The Proposed Project is located at 740 Terminal Way in San Pedro.[3] The land use designation of the site is proposed to be changed to a dual designation of Container and Maritime Support via a Port Master Plan amendment.[4] Based on a review of an aerial photograph, the nearest sensitive receptors (e.g., residences) are approximately 1.3 miles west of the Proposed Project site. Construction would occur over 24 months, and operation would commence in 2027.[5]

[1] Draft EIR. p. 2-1.
[2] *Ibid.* p. 2-2.
[3] *Ibid.* p. 2-3.
[4] *Ibid.* p. 2-5.
[5] *Ibid.* p. 2-11.

-1-

Uriel de los Reyes, Environmental Specialist October 30, 2025

South Coast AQMD Comments

Export Information During Construction

SCAQMD-1

Section 3.1 (Air Quality and Health Risk) of the Draft EIR states that approximately 270,000 cubic yards of soil would be exported from the site during the grading phase.[6] However, the Draft EIR does not identify the specific disposal facility or landfill designated to receive the exported soil, nor does it specify the haul distance between the site and the disposal location. In the California Emissions Estimator Model (CalEEMod) analysis, a default one-way haul distance of 20 miles was assumed. Should the actual disposal site be located at a greater distance from the site, the current modeling analysis may have underestimated the criteria air pollutants and greenhouse gas emissions associated with material hauling. To improve the accuracy of the emission estimates, the Lead Agency is recommended to identify the anticipated disposal site(s), quantify the actual haul distance(s), and revise the CalEEMod[7] assumptions to reflect project-specific conditions in the Final EIR.

Potentially Underestimated Construction Emissions

SCAQMD-2

Chapter 2 (Project Description) of the Draft EIR acknowledges that soil and groundwater at the site are known to contain contamination at varying levels, and that due to the extent of proposed ground improvement activities, it is likely that contamination would be encountered during construction.[8] In addition, Section 3.4 (Hazards and Hazardous Materials) references prior environmental investigations identifying elevated concentrations of total petroleum hydrocarbons (TPH), volatile organic compounds (VOC), semi-volatile organic compounds (SVOC), polycyclic aromatic hydrocarbons (PAH), and pesticides in soil, as well as TPH, arsenic, copper, nickel, and polychlorinated biphenyls (PCB) in groundwater, exceeding applicable regulatory screening levels at the time of assessment.[9]

While Mitigation Measure (MM) HAZ-1 proposes pre-construction soil and groundwater sampling and analysis to characterize the nature and extent of the contamination,[10] the Draft EIR does not provide an evaluation of potential air quality impacts associated with the cleanup/remediation activities, including the potential emissions of fugitive dust, VOC, and other hazardous air pollutants that may be released during disturbance, excavation, or treatment of contaminated materials. Due to the potential presence of contaminated soils, the Lead Agency is recommended to review and ensure compliance with all applicable requirements of South Coast AQMD Rule 1166 — Volatile Organic Compound Emissions from Decontamination of Soil[11] and Rule 1466 — Control of Particulate Emissions from Soils with Toxic Air Contaminants,[12] during all soil disturbance, handling, and remediation activities. Compliance with these rules will ensure that potential emissions of VOC and toxic particulates are minimized and appropriately controlled in accordance with South Coast AQMD regulations.

[6] *Ibid.* p. 3.1-15.
[7] CalEEMod free of charge available at https://www.caleemod.com/
[8] *Ibid.* p. 2-10.
[9] *Ibid.* p. 3.4-17.
[10] *Ibid.* p. 3.4-17.
[11] South Coast AQMD, Rule 1166 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf
[12] South Coast AQMD, Rule 1466 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf

Cleanup activities will likely involve the use of heavy-duty, diesel-fueled trucks for soil export and result in emissions from truck hauling activities and vehicle trips by workers that will be required to conduct cleanup/remediation activities. Additionally, the cleanup/remediation activities will likely require the use of additional equipment that may be different from typical equipment for grading and site preparation for construction. Based on the emission calculations from the CalEEMod detailed report, a one-way truck trip length of 20 miles was relied upon to quantify the construction emissions from hauling activities. If the cleanup/remediation activities include the removal and disposal of contaminated soil, depending on the type of contamination, contaminated soil may need to be transported to a permitted hazardous waste disposal facility located outside Los Angeles County, which could require a one-way trip that would have a substantially greater travel distance beyond 20 miles. **SCAQMD-3**

To ensure an accurate quantification of construction-related emissions, including the cleanup activities, particularly for regional criteria pollutants and greenhouse gases, the Lead Agency is recommended to revise the CalEEMod model inputs to reflect the actual distance to a specified permitted hazardous waste disposal facility. The selected trip length should be clearly disclosed and explained in the Final EIR. Should the Lead Agency elect not to revise the 20-mile haul distance, a detailed rationale supported by substantial evidence in the administrative record must be provided to demonstrate the appropriateness of the assumption in the context of the project-specific conditions.

Inappropriate Use of South Coast AQMD's Mass Rate Localized Significance Threshold Look-Up Table to Analyze the Proposed Project's Localized Air Quality Impact **SCAQMD-4**

The analysis of localized significance thresholds (LSTs) in the Draft EIR appears to inappropriately rely on the South Coast AQMD LST screening tables to assess localized air quality impacts associated with both construction and operational activities. However, as outlined in Table 3-2 of the South Coast AQMD Final LST Methodology guidance,[13] the screening tables are not intended for projects with a disturbed area exceeding five acres. Given that the Proposed Project encompasses approximately 89.2 acres, the reliance on the screening tables is inappropriate because the localized pollutant concentrations are likely underestimated.

To ensure an accurate and technically robust assessment of potential localized air quality impacts, the Lead Agency is recommended to: 1) conduct project-specific air dispersion modeling, which quantifies the concentrations of criteria pollutants at sensitive receptor locations during both the construction and operational phases; and 2) incorporate the results into the Final EIR.

Truck Idling Duration and Emissions Modeling **SCAQMD-5**

According to the technical file provided by the Lead Agency labeled *AQ GHG Appendix v250908*, an assumption of nine minutes of idling per truck per day was used to estimate diesel particulate matter (DPM) emissions for the health risk assessment (HRA).[14] The application of the nine-minute idling duration contains a reference in the Draft EIR that this assumption is consistent with the Port of Los Angeles Inventory of Air Emissions for Calendar Year 2017. However, in light of

[13] South Coast AQMD's Final LST Methodology available at https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf
[14] Provided Technical File labeled as _AQ GHG Appendix v250908.

the increased activities and truck volumes at the Port of Los Angeles over the past eight years, the actual idling times may be longer in duration since the Proposed Project is anticipated to involve 3,682 and 6,838 diverted truck trips per day in the opening year 2027 and buildout 2046, respectively.[15] Moreover, it is reasonable to expect that individual trucks may experience extended periods of idling due to on-site queuing, security checks, staging, loading, and unloading operations, among other factors, particularly during peak hours or in congested circulation areas. As such, a nine-minute idling duration may underestimate actual on-site idling behavior and, consequently, DPM emissions, which are a key contributor to localized health risks.

SCAQMD-5 (cont'd)

While the California Air Resources Board (CARB) limits diesel truck idling to five minutes as set forth in the Airborne Toxic Control Measure (ATCM), an exemption from this requirement is allowed for trucks equipped with engines that meet the optional low-NOx idle emission standard, which is typically applicable to model year 2008 and newer trucks. These vehicles, often referred to as "clean idle" certified, are permitted to idle longer than five minutes when situated more than 100 feet from sensitive land uses such as homes and schools.[16] Furthermore, CARB's EMFAC2021 Volume III Technical Document (Table 4.4.2-5) indicates that heavy-duty trucks may idle for up to five hours at a single location under certain conditions.[17] For these aforementioned reasons, as a practical matter, the idling duration for onsite heavy-duty trucks visiting the Proposed Project site could idle for a much longer duration than what was analyzed in the Draft EIR. Thus, the HRA may have substantially underestimated the full extent of operational health risks associated with the DPM emissions from the anticipated onsite heavy-duty truck activities.

Accurate characterization of idling activity is essential to fully assess the potential health risk impacts, particularly for nearby sensitive receptors. Therefore, to ensure the HRA provides an accurate and health-protective estimate of potential exposure, the Lead Agency is recommended to either: 1) revise the operational emissions modeling in the Final EIR to assume a minimum of 30 minutes of idling per truck per day, unless site-specific data or operational constraints justify a shorter duration; or 2) provide empirical evidence, such as facility-specific queuing and processing time studies, vehicle circulation modeling, or comparable industry data, to substantiate the nine-minute assumption as representative of expected operations of the Proposed Project.

Emission Rate Calculations Used in Health Risk Assessment Modeling

SCAQMD-6

Section 3.1 (Air Quality and Health Risk) of the Draft EIR states that on-site construction-related DPM emissions are estimated to average 0.11 ton per year (tpy) over the 24-month construction period. For operational activities, DPM emissions are projected to be approximately 0.09 tpy in the opening year, 2027.[18]

[15] *Ibid.* p. 3.1-17.
[16] CARB, Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling was promulgated in Chapter 13 of the California Code of Regulations, Section 2485: Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling, https://ww2.arb.ca.gov/sites/default/files/2022-06/13_CCR_2485_OAL_06222022-2_ADA_06272022_0.pdf
[17] CARB, EMFAC2021 Volume III Technical Document, Table 4.4.2-5, p. 161., available at https://ww2.arb.ca.gov/sites/default/files/2021-03/emfac2021_volume_3_technical_document.pdf
[18] *Ibid.* p. 3.1-20.

However, a review of the supporting documentation provided by the Lead Agency, specifically, the technical file titled *AQ GHG Appendix v250908*, reveals methodological inconsistencies in the estimation of DPM emissions for both construction and operational phases. Notably, operational-year emissions were derived by converting maximum daily emissions in pounds per day (lb/day) to annualized values, whereas construction-phase emissions were calculated as a multi-year average. This inconsistent approach may compromise the comparability and accuracy of the emission estimates used in the HRA. **SCAQMD-6 (cont'd)**

Furthermore, the Draft EIR states that "the Proposed Project was assumed to permanently increase on-site DPM emissions by up to 0.11 tpy, rather than limiting this level of emissions to the 24-month construction period.[19]" This assumption leads to the use of averaged annual emissions in the HRA, rather than modeling based on peak or maximum exposure values, which may underestimate potential health risks to nearby sensitive receptors.

Given these discrepancies, the Lead Agency is recommended to: 1) apply and clearly state a consistent and technically supported methodology for calculating DPM emissions across all phases of the Proposed Project; 2) revise the HRA modeling accordingly; and 3) disclose the updated emission estimates and associated HRA results in the Final EIR.

Outdated Meteorological Data in the HRA Modeling **SCAQMD-7**

Section 3.1 (Air Quality and Health Risk) of the Draft EIR indicates that the worst-case ambient downwind concentrations are estimated in the HRA analysis by applying a five-year record from 2012 to 2016 of modeled-ready meteorological data from Long Beach Airport (KLGB).[20] In addition, based on the technical files provided by the Lead Agency, the MET data used in modeling is the KLGB version 9.

It should be noted that this data corresponds to Version 9 of South Coast AQMD's AERMOD-ready MET dataset, which is no longer available or recommended for use. South Coast AQMD released an updated version of AERMOD-ready meteorological data (Version 11) in October 2024.[21] This updated dataset was developed using the U.S. EPA's AERMET processor (Version 22112), along with AERMINUTE (Version 15272) and AERSURFACE (Version 20060), and reflects current regulatory guidance and processing methodologies.

To ensure technical accuracy, transparency, and consistency with the current South Coast AQMD recommendations, the Lead Agency is recommended to:

- Reassess the selection of meteorological data using the latest Version 11 dataset;
- Revise the HRA modeling inputs accordingly; and
- Include updated air quality modeling results in the Final EIR

This approach will ensure that air dispersion modeling is based on the most recent and appropriate meteorological data, thereby supporting a robust and defensible environmental analysis.

[19] *Ibid.* p. 3.1-21.
[20] *Ibid.*
[21] South Coast AQMD AERMOD-Ready MET Data Files available at https://www.aqmd.gov/assets/aermet/AERMET_files_And_HRA_Tool.html

Unsupported Truck Trip Distance On and Off-site

SCAQMD-8

Section 3.1 (Air Quality and Health Risk) of the Draft EIR indicates that diverted truck trips associated with the Proposed Project may involve up to 1.87 additional miles per one-way trip to access the site and approximately 0.35 miles of each one-way trip will occur on-site.[22] According to the technical file provided by the Lead Agency, the 1.87-mile estimate is based on the "Port of Los Angeles Goods Movement Division, spreadsheet 20230112," while the 0.35-mile estimate is described as "from gate to extent of site." However, the Draft EIR did not include: 1) the referenced spreadsheet or other supporting documentation to explain how these trip length assumptions were derived; 2) a clear description of the route methodology; 3) assumptions about vehicle travel patterns; 4) supporting explanation for how these distances reflect actual operational conditions for truck trips; and 5) a traffic analysis.

Given the importance of the truck trip lengths when quantifying criteria pollutant emissions, toxic air contaminant exposure, and associated health risks (e.g., DPM impacts) from the Proposed Project, it is imperative that the analysis be supported by transparent and verifiable data. Without detailed documentation or substantial evidence to support these input values, the air quality analysis and HRA may be inaccurate by underestimating emissions from the Proposed Project.

In addition, construction of the Vincent Thomas Bridge Deck Replacement Project (SCH No. 2023040301) is anticipated to commence in late 2025, with the bridge closure scheduled for fall 2026 and its reopening before the 2028 Olympic Games.[23] Given that the bridge closure period overlaps with the anticipated construction schedule of the Proposed Project, it is reasonable to expect temporary detours, delays, and associated increases in traffic volumes along alternate routes. Consequently, the assumed off-site travel distance of 1.87 miles may not accurately represent actual travel conditions or vehicle activities during the construction period, potentially underestimating the associated air quality emission estimates. Such changes in travel behavior and roadway utilization result in an increase of estimated emissions of criteria air pollutants and greenhouse gases associated with construction worker commutes, material and export hauling, equipment transport, etc. Therefore, the air quality analysis should include a scenario that analyzes this potential variability in off-site travel patterns due to regional construction activities to more accurately characterize potential emissions under modified traffic conditions.

To ensure compliance with CEQA requirements for disclosure and substantiation of assumptions used in impact analyses, the Lead Agency is recommended to provide the following in the Final EIR:

- A detailed explanation of the methodology used to calculate the 1.87-mile and 0.35-mile truck trip distances, including all assumptions, data sources, and any applicable traffic modeling or routing considerations.
- Inclusion of the referenced spreadsheet or relevant excerpts demonstrating how the trip distances were derived.
- A revision, as necessary, of the truck trip distance assumptions to account for potential detours and rerouting associated with the Vincent Thomas Bridge closure, ensuring that

[22] *Ibid.* p. 3.1-17.
[23] Vincent Thomas Bridge Deck Replacement Project available at https://dot.ca.gov/caltrans-near-me/district-7/district-7-projects/d7-vincent-thomas-bridge-bridge-deck-replacement

modeled trip lengths reflect reasonably foreseeable travel conditions during concurrent regional construction activities.

- A discussion of how the assumed trip lengths reflect realistic operational conditions, accounting for potential variability in truck origin-destination patterns, roadway access constraints, and on-site circulation characteristics.

SCAQMD-8 (cont'd)

Providing this information in the Final EIR will enhance the transparency and robustness of the air quality analysis and ensure that the conclusions reached are supported by substantial evidence, as required under CEQA.

SCAQMD-9

Additional Recommended Air Quality and Greenhouse Gas Mitigation Measures and Project Design Features for Consideration

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. To further reduce the Proposed Project's air quality impacts, in addition to the Project Feature PF AQ-1 (Zero-Emissions Operational Equipment) and Mitigation Measure MM AQ-1 (Zero-Emission Cargo-Handling Equipment), the following mitigation measures and project design considerations are recommended to be incorporated into the Final EIR.

Mitigation Measures to Reduce Operational Air Quality Impacts from 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 CARB'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 for 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 are 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 EIR. 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.

Mitigation Measures to Reduce Operational Air Quality Impacts from 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.

SCAQMD-9 (cont'd)

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.

SCAQMD-10

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

1. State of California – Department of Justice: Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act[24]
2. South Coast AQMD 2022 Air Quality Management Plan,[25] 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) Transportation, Air Quality, and Climate Change.[26]

[24] 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
[25] 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
[26] United States Environmental Protection Agency (U.S. EPA) Transportation, Air Quality, and Climate Change available at https://www.epa.gov/transportation-air-pollution-and-climate-change

Information on the CERP for the Designated AB 617 WCWLB Community

SCAQMD-11

The Proposed Project is located within the AB 617-designated Wilmington, Carson, and West Long Beach (WCWLB) community, which is heavily impacted by air pollution generated from sources such as ports, refineries, the 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.[27] The Lead Agency is recommended to review the air quality priorities and related actions in Chapter 5 of the WCWLB CERP in order to reduce air pollution in this community. The Lead Agency is also recommended to continue working with the South Coast AQMD to explore whether additional measures to mitigate or further reduce emissions can be implemented at the site.

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

SCAQMD-12

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. The South Coast AQMD Governing Board is scheduled to consider this item at its Public Hearing on November 7, 2025. The agenda item may be accessed 72 hours prior to the Public Hearing at: https://www.aqmd.gov/home/news-events/meeting-agendas-minutes.

South Coast AQMD Air Permits and Role as a Responsible Agency

SCAQMD-13

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., one or more air permits from South Coast AQMD will be required. The Final EIR should include a discussion about the South Coast AQMD rules that may be applicable to the Proposed Project. Those rules may include, for example, Rule 201 – Permit to Construct,[28] Rule 203 – Permit to Operate,[29] Rule 401 – Visible Emissions,[30] Rule 402 – Nuisance,[31] Rule 403 – Fugitive Dust,[32] Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,[33] Rule 1113 – Architectural Coatings,[34] Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil,[35]

[27] 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.
[28] South Coast AQMD, Rule 201 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf
[29] South Coast AQMD, Rule 203 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf
[30] South Coast AQMD, Rule 401 available at https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf
[31] South Coast AQMD, Rule 402 available at https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf
[32] South Coast AQMD, Rule 403 available at https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403
[33] South Coast AQMD, Rule 1110.2 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf
[34] South Coast AQMD, Rule 1113 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf
[35] South Coast AQMD, Rule 1166 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf

Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants,[36] and Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines,[37] etc. **SCAQMD-13 (cont'd)**

It is important to note that if air permits from the South Coast AQMD are required, South Coast AQMD's role under CEQA will become the Responsible Agency of the Proposed Project. Per CEQA Guidelines Section 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. Also, as set forth in CEQA Guidelines Section 15096(h), the Responsible Agency is required to make Findings in accordance with CEQA Guidelines Section 15091 for each significant effect of the project and issue a Statement of Overriding Considerations in accordance with CEQA Guidelines Section 15093, if necessary. Lastly, as set forth in CEQA Guidelines Section 15096(i), the Responsible Agency may file a Notice of Determination.

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 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.

Conclusion **SCAQMD-14**

As set forth in Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b), the Lead Agency shall evaluate comments from public agencies on environmental issues and prepare a written response at least 10 days prior to certifying the Final EIR. 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 EIR. 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,

[36] South Coast AQMD, Rule 1466 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf
[37] South Coast AQMD, Rule 1470 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf

detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided.

SCAQMD-14 (cont'd)

Thank you for the opportunity to provide comments. South Coast AQMD staff are available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Danica Nguyen, Air Quality Specialist, at dnguyen1@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

Sam Wang
Program Supervisor, CEQA IGR
Planning, Rule Development & Implementation

BR:SW:DN
LAC250916-01
Control Number

Responses

Response to Comment SCAQMD-1:

The air pollutant and GHG emissions estimates for the construction phase were revised and updated in the Partially Revised and Recirculated Draft EIR to reflect soil exports occurring over an average distance of 80 miles per one-way trip. See Response to Comment CARB-3.

Response to Comment SCAQMD-2:

The Draft EIR recognized that soil contamination exists at varying degrees and handling, managing, and transport of soil would depend on additional site characterization, including pre-construction soil and groundwater sampling and analysis required by mitigation measure (MM) HAZ-1. Depending on the outcome of this analysis, the construction contractor would be required to adhere to all applicable soil treatment, reuse, and/or disposal standards, the Project-specific Soil Management Plan (Final EIR Appendix D), and the Project-specific health and safety plan. See Response to Comment DTSC-3.

The Partially Revised and Recirculated Draft EIR included clarifications to indicate the potential applicability of SCAQMD rules governing volatile organic and toxic contaminants in contaminated soils to ensure that potential emissions of VOC and toxic particulates are minimized and controlled. See Final EIR Section 3.1 (*Air Quality and Health Risk*). No additional revisions to the EIR (Draft EIR and Partially Revised and Recirculated Draft EIR) are required.

Response to Comment SCAQMD-3:

The Draft EIR recognizes that soil contamination exists at varying degrees. Excavation activities and export of soil are included in the site preparation and grading phases, which include emissions estimates for off-road diesel-powered equipment and on-highway haul trucks for material handling. The Partially Revised and Recirculated Draft EIR revised quantification of construction phase emissions to reflect the potential for soil exports to travel an average distance of 80 miles per one-way trip. See Final EIR Section 3.1 (*Air Quality and Health Risk*). See Response to Comment CARB-3.

Response to Comment SCAQMD-4:

While LST screening tables are not intended for projects with disturbed areas exceeding five acres, the EIR (Draft EIR and Partially Revised and Recirculated Draft EIR) analysis points to the reference guidance for the screening tables and compares all Project emissions to the mass rate thresholds in the look-up tables. All emissions from across the entire site and also off-site emissions are summed for the Project's mass rates shown in Final EIR Table 3.1-6 and Table 3.1-8 (Impact AQ-2 and Impact AQ-4). This approach results in overestimating the localized impacts as follows. The LST screening tables are based on pollutants being emitted into a relatively small five-acre airspace, when in fact Project emissions would be widely dispersed at the larger Project site. Because the proposed Project would emit into the larger airspace of the site, downwind Project concentrations would be more diluted and lower than those that make the basis for the mass rate LST screening look-up tables. For toxic air contaminants (Impact AQ-5), the dispersion modeling is based on DPM being emitted across the area of the site. Given that

the criteria pollutant analysis utilizing the LST tables falls below the emissions thresholds, no additional analysis is needed.

Response to Comment SCAQMD-5:

As noted, truck idling may vary across the truck fleet depending on on-site queuing, security checks, staging, loading, and unloading operations, among other factors. The 2025 Draft EIR recognized the current CARB five-minute limitation on diesel truck idling and included nine minutes per visit to quantify these emissions in a manner consistent with prior studies for the Port. The Partially Revised and Recirculated Draft EIR revised this idling assumption upward to approximately 20 minutes per visit based on the existing maximum "time on terminal" documented for similar chassis yards, which are non-container terminal operations in the port-wide inventory (POLA, 2025). Recent years of emissions inventories and methodology reports use "low idle" emission factors and indicate that recent model year distributions of trucks at San Pedro Bay Ports have not included trucks older than model year 2007 (San Pedro Bay Ports, 2025). The updated idling assumptions are reflected in the Partially Revised and Recirculated Draft EIR Appendix B1, and in Section 3.1 (*Air Quality and Health Risk*). These revisions are also captured in this Final EIR. The severity of an existing significant, unavoidable impact (Impact AQ-3) in Section 3.1 (*Air Quality and Health Risk*) was increased, and a new potentially significant but mitigable impact (Impact GHG-1) in Section 3.3 (*Greenhouse Gas Emissions*) was identified in the Partially Revised and Recirculated Draft EIR. Two additional impacts (Impact AQ-4 and Impact AQ-5) in Section 3.1 (*Air Quality and Health Risk*) were identified as having increased emissions, but impacts remained less than significant. These updated results, as well as the associated updated significance conclusions, were presented in the Partially Revised and Recirculated Draft EIR and are reflected in Section 3.1 (*Air Quality and Health Risk*) and Section 3.3 (*Greenhouse Gas Emissions*) of this Final EIR. No additional analysis is needed.

Response to Comment SCAQMD-6:

As appropriate for a screening-level analysis, the Draft EIR included certain assumptions to ensure that potential health risks were overpredicted. In this case, the average annual rate of on-site DPM emissions during construction was found to be greater than the annual rate of DPM during operational years. The Partially Revised and Recirculated Draft EIR included updated screening of health risks by separating the different years of construction and operation. The results were reflected in Section 3.1 (*Air Quality and Health Risk*) and Partially Revised and Recirculated Draft EIR Appendix B2, Health Risk Assessment. These revisions are also captured in this Final EIR (Impact AQ-5).

Because this Final EIR includes revisions to construction-phase emissions (for exporting soil) and also revisions to operational emissions for clarifying the anticipated onsite travel and idling, the HRA has been revised. See Final EIR Section 3.1 (*Air Quality and Health Risk*).

Response to Comment SCAQMD-7:

As mentioned, the SCAQMD issued a revised edition of AERMOD-compatible meteorological data in October 2024. This occurred after completion of the proposed Project analysis by LAHD for the Draft EIR.

LAHD notes that the dispersion modeling in the Draft EIR was performed in early 2024 using the most recent publicly available versions of AERMOD (version 23132) and

SCAQMD's meteorological data, as they were at that time. The Draft EIR used the SCAQMD's meteorological data from the Long Beach Airport. The Partially Revised and Recirculated Draft EIR revised the dispersion modeling for downwind DPM concentrations to use AERMOD-ready data, compiled from actual hourly observations collected from January 1, 2012 through December 31, 2016, at the Wilmington Community Station (WCS) at Saints Peter and Paul School. This meteorological data set was processed by the Port in 2018 using the most recent version of AERMET at the time, version 16216.

The WCS is part of the Port's site-specific monitoring network and is located about 2.1 miles north of the Project site. It is considered the most representative meteorological station for the Project, in accordance with the "Sphere of Influence" analysis conducted by POLA and POLB as part of the Bay-Wide Regional Human Health Risk Assessment supporting the 2010 Update to the Clean Air Action Plan (San Pedro Bay Ports, 2010). The purpose of the "Sphere of Influence" analysis was to fully characterize the varying conditions found in different areas of the Ports' operations. The study evaluated over 15 meteorological stations (including stations processed by the SCAQMD for use in AERMOD) located within a 20-kilometer radius of the Ports and investigated several selection criteria, including the influence of geographic features on prevailing wind patterns to determine representativeness of the surface meteorological stations. Based on the results of that analysis, the WCS was recommended for projects in the inner harbor area for CEQA purposes; the same station has been used for other Port projects in the same area in past EIRs.

The USEPA's Guideline on Air Quality Models does not set an age limit on meteorological data used in dispersion modeling (published as Appendix W of 40 CFR Part 51). Rather, the guideline places the most emphasis on geographical representativeness and data completeness, both of which are satisfied by the 2012-2016 WCS data set. Because the collection, validation, missing data handling, and AERMET processing tasks are rigorous, agencies typically don't re-process meteorological data every time a new year of data is collected or a new version of AERMET is released. For example, the SCAQMD re-processes meteorological data for use in AERMOD approximately every five years even though AERMET is often updated more frequently. Similarly, the Port also periodically updates its meteorological data sets and is currently in the planning stage for a new update.

The Partially Revised and Recirculated Draft EIR updated the modeling for the Proposed Project to use the most recent and representative AERMOD-ready meteorological data set from the WCS. Although the AERMET meteorological data processor has been updated since 2016, the AERMET updates included various enhancements, bug fixes, and minor corrections but did not include substantial changes to the main meteorological data processing algorithms. As a result, the Port expects that the 2012-2016 WCS meteorological data set and resulting health risk results would not change substantially if the same meteorological data were re-processed with the most recent version of AERMET.

Because the WCS is the most representative geographically, LAHD has revised the dispersion modeling and health risk analysis to use meteorological data from WCS and the updated release of AERMOD (version 24142). See Final EIR Section 3.1 (*Air Quality and Health Risk*) and Final EIR Appendix B1.

Response to Comment SCAQMD-8:

The Partially Revised and Recirculated Draft EIR quantifies emissions during Proposed Project operations including those associated with heavy-duty truck trips traveling offsite and onsite. See Response to Comment CARB-2 regarding the numbers of truck trips and Response to Comment CARB-4 regarding the basis for the length of diverted trips for off-site travel distances.

The typical truck travel distance on site was included in the Draft EIR based on a preliminary review of the site plan and dimensions of the site. The one-way average travel length on site represents a typical segment of travel between the chassis stalls, roughly in center of the parking area within the loop, and the Ferry Street/Terminal Way intersection. The Partially Revised and Recirculated Draft EIR included a reevaluation of the site plan and the distance of travel over the new grade separation (Figure 2-3, Project Site Plan), the typical on-site circulation was found to be greater than shown in the Draft EIR. The Partially Revised and Recirculated Draft EIR included revisions to clarify the basis for on-site travel distances and to account for additional on-site emissions. The revisions include updated quantification of criteria air pollutants, DPM, and GHG. See also Final EIR Section 3.1 (*Air Quality and Health Risk*).

Planning for the future Vincent Thomas Bridge Deck Replacement and other temporary detours or traffic delays would be accommodated through traffic management. As construction of the Proposed Project is likely to overlap with the Vincent Thomas Bridge Deck Replacement Project, LAHD shall perform all necessary coordination with Caltrans. LAHD has been coordinating closely with Caltrans (including issuance of permits to Caltrans) on their traffic management plan for the planned closure of the Vincent Thomas Bridge from 2026 to 2029. No additional analysis is necessary.

Response to Comment SCAQMD-9:

A range of mitigation measures to reduce operational air quality impacts from mobile sources related to drayage truck technologies and infrastructure are presented by SCAQMD. LAHD has considered these recommendations; however, none were determined to be feasible. For example, LAHD considered and rejected the recommendation to limit the daily number of trucks allowed at the facility. Neither LAHD nor prospective tenant(s) would own or control the drayage trucks used by the that would utilize the proposed MSF, and the facility would be placed at a severe competitive disadvantage if forced to turn away vehicles. Similarly, the Port does not have the legal authority to require specific engine technologies or mandate a phased transition to an all zero-emission drayage fleet for the Project. These recommendations would be infeasible as they would interfere with the price, route, and service of non-zero-emission trucks. The Proposed Project would include the necessary charging infrastructure.

See Response to Comment CARB-5 regarding phase-in of cleaner operating trucks, and CARB-6 regarding additional limitations on idling.

Response to Comment SCAQMD-10:

Various statewide and regional documents providing potential mitigation measure options designed to manage air quality impacts from transportation-related activities and mobile sources in general are recommended by SCAQMD for consideration, including the SCAQMD 2022 AQMP.

The Draft EIR's analysis for consistency with the 2022 AQMP under Impact AQ-6 includes a discussion of the various control measures related to ports, including measures to deploy zero-emission and low NOx technologies for trucks and cargo-handling equipment. The analysis concludes that the Proposed Project would not conflict with or obstruct implementation of the 2022 AQMP control measures.

The LAHD notes that the 2022 AQMP is a regional, programmatic document that does not specifically incorporate or mention each and every project in the region. Instead, the SCAQMD relies on growth and activity forecasts provided by local entities, including the Port of Los Angeles, to develop its forecasts of future regional emissions, necessary emissions reductions, and general strategies to achieve those reductions. The LAHD provides its forecasts of anticipated cargo growth and activity levels from all Port terminals, including the Proposed Project, to the Southern California Association of Governments (SCAG), which in turn provides them to SCAQMD via the Regional Transportation Plan. The SCAQMD, employing its own modeling tools and assumptions, uses those forecasts to develop the AQMP. No additional analysis is necessary.

Response to Comment SCAQMD-11:

While SCAQMD recommends a review of the air quality priorities and related actions within Chapter 5 of the CERP, the Draft EIR included a review of Chapter 5c: Ports of the September 2019 Final CERP (SCAQMD, 2019) and concluded that the Proposed Project would not conflict with the CERP (page 3.1-24).

See also Response to Comment CARB-1. No additional analysis is necessary.

Response to Comment SCAQMD-12:

The comment encourages a review of the *Proposed Draft Cooperative Agreement*. No additional analysis is necessary.

Response to Comment SCAQMD-13:

SCAQMD has identified the possibility of new stationary and portable sources, including emergency generators, fire water pumps, or boilers, that may trigger air permitting requirements. If air permits from the SCAQMD are required for the Proposed Project, the role of SCAQMD under CEQA will be as a Responsible Agency. The Project Description (Draft EIR Table 2-1) identifies this responsibility of the SCAQMD. However, the Proposed Project does not include any stationary sources or portable equipment that would require SCAQMD air permits.

The comment indicates certain SCAQMD rules could become applicable depending on the leaseholder activities or the handling and treatment of contaminated soils. The Final EIR includes revisions to clarify the scope of rules governing these types of sources. See Final EIR Section 3.1 (*Air Quality and Health Risk*).

Response to Comment SCAQMD-14:

As required by State CEQA Guidelines Section 15088 (a-b), LAHD will provide responses to SCAQMD's comments at least 10 days prior to certification of the Final EIR. Detailed reasons supported by substantial evidence have been provided in the above responses to comments.

10.4. Organizations

American Soybean Association

Comment Letter

February 20, 2026

Lisa Wunder
Director of Environmental Management
Lost Angeles Harbor Department
425 South Palos Verdes Street
San Pedro, CA 90731

Comments submitted electronically via: ceqacomments@portla.org

Re: Port of Los Angeles Comments on the Revised and Recirculated Draft Environmental Impact Report (RDEIR) - Terminal Island Maritime Support Facility Project

Dear Director Wunder:

The following comments from the American Soybean Association (ASA) are submitted in response to the Partially Revised and Recirculated Draft Environmental Impact Report (RDEIR) for the proposed Terminal Island Maritime Support Facility Project. ASA represents approximately 500,000 U.S. soybean farmers on domestic and international policy issues important to the soybean industry and has 26 affiliated state associations representing 30 soybean-producing states. U.S. soybean growers have long been committed to producing the world's food, feed, fuel, and thousands of bioproducts in a sustainable and climate-smart way.

ASA recognizes that communities near California's ports, many of which are disadvantaged, continue to experience disproportionate public health burdens from emissions such as nitrogen oxides (NOx), particulate matter (PM), reactive organic gases (ROG), and greenhouse gases (GHGs). Addressing emissions is therefore essential to improving air quality, meeting state and federal air quality standards, and achieving California's climate goals. ASA supports the Port's efforts to reduce greenhouse gas and criteria pollutant emissions from freight operations.

As the Port evaluates feasible pathways to achieve these reductions, we recommend that the Final Environmental Impact Review (EIR) acknowledge the role that low-carbon liquid fuels, including soy-based biodiesel and renewable diesel, can play as complementary emissions-reduction technologies alongside zero-emission equipment. These fuels are commercially available today, require no new vehicle turnover, and are recognized under state and federal clean fuel programs for delivering meaningful lifecycle greenhouse gas reductions. Maintaining a technology-neutral framework will help ensure the Port can deploy the full suite of solutions needed to achieve near- and long-term climate goals while improving operational and logistical throughput. **ASA-1**

Finally, recognizing the role of U.S. agriculture in decarbonizing transportation fuels offers a pathway that balances environmental integrity with economic opportunity. With thoughtful project implementation, the Port of LA can lead the way in promoting clean fuels while supporting U.S. farmers and the rest of the value chain. We appreciate the Port of LA's leadership and look forward to continued engagement in the future.

Sincerely,



Scott Metzger
President, American Soybean Association

Responses

Response to Comment ASA-1

The comment pertains to use of low carbon liquid transportation fuels, including soy-based biodiesel and renewable diesel, as a means of achieving GHG emissions reductions. The proposed facility and facility users would use California fuels that are subject to the Low Carbon Fuel Standard regulations, as noted in Final EIR Section 3.3, *Greenhouse Gas Emissions*, Table 3.3-4. No further discussion is necessary.