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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 community¹ 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

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 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.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

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

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://kentic.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://kentic.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.

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

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.

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

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 NO_x, 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 NO_x 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.

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.

- 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,

A handwritten signature in blue ink, appearing to read "Matthew O'Donnell".

Matthew O'Donnell, Chief, Risk Reduction Branch

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