August 14, 2026

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Sent via email

Dear Alyssa Rodriguez:

Thank you for providing the California Air Resources Board (CARB) with the opportunity to comment on the Notice of Preparation (NOP) for the Pier T Marine Terminal Redevelopment Project (Project) Draft Environmental Impact Report (DEIR), State Clearinghouse No. 2026061282. The Project is located within the jurisdiction of the Port of Long Beach (POLB), which is the lead agency for California Environmental Quality Act (CEQA) purposes.

The proposed Project would expand and modernize the existing marine terminal from approximately 382 acres to 500 acres to improve cargo-handling efficiency, accommodate larger container vessels, and support the transition to zero-emission terminal operations.[1] The Project includes both waterside and landside improvements, such as reconstructing and extending the existing wharf, dredging navigation areas, upgrading bollards and fenders, expanding the on-dock rail yard, constructing a new truck gate complex, and installing supporting utilities. Construction would be phased over approximately 17 years while terminal operations continue. Upon completion, the redeveloped terminal would have the capacity to handle up to 3.3 million containers annually, approximately 6.1 million twenty-foot equivalent units (TEU), with the expanded on-dock rail yard designed to move at least one-third of the terminal's container throughput by rail.

Residences are located to the north, east, and west of the Project site, with the closest residence located approximately 6,590 feet from the Project's eastern boundary. These residences are located within boundaries of the Wilmington, Carson, West Long Beach community (WCWLB) which is a designated disadvantaged community[2] and was selected for the Community Air Protection Program under Assembly Bill (AB) 617 (C. Garcia, Chapter

[1] Port of Long Beach. Notice of Preparation of an Environmental Impact Report and Notice of Public Scoping Meetings. July 2, 2026. Accessible at: *https://ceqanet.lci.ca.gov/2026061282/Attachment/Pj1-Cf*

[2] 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).)

136, Statutes of 2017)[3] 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 protect the residences near the Project site from toxic diesel particulate matter (diesel PM) exposure, CARB urges the POLB to plan for the use of zero-emission technologies within the Project site as recommended in this letter.

The Project Will Increase 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 in 2017, along with additional legislation, AB 197 in 2016, and AB 1749 in 2022, requires CARB and air districts to develop and implement emissions reporting, monitoring, and plans to reduce exposures and emissions in the communities that are the most impacted by poor air quality—known as Community Emission Reduction Programs (CERP).

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 5.0), 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 near a census tract with a CalEnviroScreen 5.0 score of 91%, placing it among the most highly impacted areas in the state.

Due to its high cumulative pollution burden, the South Coast Air Quality Management District (SCAQMD) nominated the WCWLB to be a part of the Community Air Protection Program (Program). SCAQMD established a Community Steering Committee (CSC) to help develop the CERP to reduce air pollution emissions and exposure in the community. The WCWLB CSC voted to approve the CERP, which was then adopted by the SCAQMD Governing Board, and finally approved by the CARB for selection into the Program. This Project is located within the borders of the WCWLB community.[4]

As part of developing the CERP, the WCWLB CSC identified its primary concerns, including 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

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[3] 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.

[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*

equipment at freight facilities. The CERP includes several incentive projects to reduce the impact of heavy-duty trucks, including incentives to help replace trucks with zero- and near-zero emission technology.

It is imperative 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 to ensure that its land use decisions, including its decision on this Project, are consistent with the WCWLB CERP in its entirety.

The DEIR Must Fully Evaluate the Project's Air Quality and Health Risk Impacts

CARB is concerned that the proposed Project improvements could have significant adverse impacts on public health. As described in the NOP, the proposed improvements to the existing Pier T Marine Terminal would be implemented over an estimated 17-year period. Upon full buildout, the redeveloped terminal would have the capacity to handle approximately 6.1 million TEUs annually, with at least one-third of that throughput expected to be processed through the proposed on-dock railyard. Although the NOP does not quantify these increases, the Project would likely result in a substantial increase in locomotive, heavy-duty truck, and cargo handling equipment (CHE) activity serving the POLB. This increased activity would generate additional air pollutant emissions that could disproportionately affect neighboring disadvantaged communities.

CEQA requires the lead agency to "determine whether a project may have a significant effect on the environment based on substantial evidence in light of the whole record." (See Title 14, Cal. Code of Regs., § 21082.2, subd. (a)). To fully evaluate the Project's air quality and health risk impacts, the POLB must analyze all direct and reasonably foreseeable air quality and health risk impacts associated with the operation of the Project. This analysis must include emissions from on-site activities involving diesel-powered equipment, including on-site locomotives, marine vessels, heavy-duty trucks, and trucks and trailers equipped with transport refrigeration units (TRU), as these emission sources will substantially contribute to cancer risk impacts and therefore must be included in the Project's health risk assessment (HRA).

The HRA prepared for the Project should be based on the latest Office of Environmental Health Hazard Assessment's (OEHHA) guidance (2015 Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments).[5] The on-road and off-road Diesel PM emissions used to estimate the proposed Project's cancer risk impacts should be

[5] Office of Environmental Health Hazard Assessment (OEHHA). Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments. February 2015. Accessed at: *https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf*.

based on CARB's latest 2025 Emission Factors model (EMFAC2025) and OFFROAD2021, respectively.[6,7]

CEQA also requires lead agencies to consider whether the incremental effects of a proposed project are cumulatively considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects. (See Title 14, Cal. Code of Regs., § 15064, subd. (h)(1)). The POLB must consider the combined air quality and health risk impacts of the Project, and other reasonably foreseeable projects that may arise because of the Project. Should the DEIR find that the Project would result in a cumulatively significant impact, CEQA requires that the POLB must implement all feasible mitigation measures to reduce those impacts to a less-than-significant level.

The DEIR Should Include All Feasible Mitigation Measures

To reduce the Project's potential air quality impacts, CARB urges the POLB to incorporate into the DEIR either a project design feature or a mitigation measure requiring the installation of infrastructure necessary to support zero-emission technologies. CARB also recommends that the DEIR requires the phased deployment of zero-emission heavy-duty trucks, locomotives, and on-site CHE within the Project area.

Zero-emission locomotive technologies are rapidly advancing and are expected to be capable of meeting the operational needs of the Project. Based on emerging battery-electric and hydrogen fuel cell technologies, CARB estimates that commercially available zero-emission switcher locomotives will be available by 2030, with freight line-haul locomotives expected by 2035.[8] CARB has sponsored, and continues to sponsor, demonstration projects that accelerate the deployment of clean freight technologies and reduce emissions associated with goods movement throughout California. For example, CARB's Zero- and Near Zero-Emission Freight Facilities Program has successfully demonstrated battery-electric locomotive technologies that could be deployed as part of the Project.[9]

Zero-emission drayage trucks are already commercially available and could be incorporated into Project operations at the outset. The Hybrid and Zero-Emission Truck and Bus Voucher

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[6] CARB. Emission Factors model Web Platform. Accessible at: *https://arb.ca.gov/emfac/emissions-inventory/7fbbb7c961d621ffc05eb5e5f8dfd175c8cff0fc*

[7] CARB. OFFROAD2021 Web Platform. Accessible at: *https://arb.ca.gov/emfac/offroad/*

[8] CARB. Public Hearing to consider the Proposed In-Use Locomotive Regulation Staff Report: Initial Statement of Reasons. Appendix F. Page 52, 57. Accessible at: *https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2022/locomotive22/appf.pdf*

[9] California Air Resources Board (CARB), 2020. CARB's Zero and Near Zero-emission Freight Facility Program. Accessible at *https://ww2.arb.ca.gov/news/carb-announces-more-200-million-new-funding-clean-freight-transportation#:~:text=The%20goal%20of%20CARB's%20Zero,commercialization%20of%20these%20technologies%20statewide*

Incentive Project (HVIP), a California Climate Investments program, maintains a list of commercially available zero-emission trucks and provides incentives to accelerate fleet adoption.[10] Current HVIP vehicle specifications indicate that battery-electric trucks typically provide a range of approximately 125 to 330 miles, while hydrogen fuel cell trucks offer ranges of approximately 350 to 500 miles. Additionally, data from the 2013 CALSTART I-710 Project Key Performance Parameters for Drayage Trucks survey found that approximately 81% of drayage trucks serving California seaports operate on routes shorter than 60 miles.[11] These operating characteristics demonstrate that commercially available zero-emission trucks are capable of meeting the drayage operations anticipated for the Project.

Similarly, zero-emission CHE is commercially available for many terminal applications. Project operators can leverage incentive funding through CARB's Clean Off-Road Equipment Voucher Incentive Project (CORE), administered by CALSTART, as well as other applicable state incentive programs, to accelerate the deployment of zero-emission CHE throughout the terminal.[12,13,14]

Given the Project's 17-year construction and buildout schedule, the POLB has a significant opportunity to plan for the deployment of zero-emission freight technologies over the life of the Project. The DEIR should therefore include enforceable project design features or mitigation measures that require the installation of infrastructure necessary to support the use of zero-emission heavy-duty trucks, locomotives, and on-site CHE.

CARB Urges the POLB to Participate in CARB's California Clean Construction Program

The construction of the Project would temporarily expose nearby residences to harmful air pollution and would contribute to the existing significant air pollution burden in the WCWLB community. To reduce these impacts, CARB urges the POLB to include a project design measure in the DEIR requiring the POLB to participate in CARB's California Clean Construction (CCC) program for the Project.

The CCC program is a voluntary initiative administered by CARB to accelerate the deployment of zero-emission and advanced clean off-road construction equipment across California. The program was developed as part of CARB's broader strategy to meet State

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[10] Zero-Emission Truck and Bus Voucher Incentive Project. Accessible at: *https://californiahvip.org/*
[11] CALSTART, Performance Parameters for Drayage Trucks Operating at the Ports of Los Angeles and Long Beach, 2013. Accessible at *https://calstart.org/wp-content/uploads/2018/10/I-710-Project_Key-Performance-Parameters-for-Drayage-Trucks.pdf*
[12] CARB Cargo Handling Equipment Commercial Availability List. Accessible at: *https://ww2.arb.ca.gov/our-work/programs/cargo-handling-equipment/zero-emission-che-availability*
[13] Clean Off-Road Equipment Voucher Incentive Project. Accessible at: *https://californiacore.org/how-toparticipate/*
[14] Zero-Emission Truck and Bus Voucher Incentive Project. Accessible at: *https://californiahvip.org/*

Implementation Plan commitments and improve air quality in communities disproportionately burdened by diesel pollution, such as the WCWLB Community. The program serves as a voluntary framework that recognizes and encourages fleets to go beyond existing regulations, such as CARB's In-Use Off-Road Diesel-Fueled Fleets Regulation. The program prioritizes the use of battery-electric, hydrogen fuel cells, and other zero-emission construction equipment where those technologies are commercially available, and where not, encourages the use of the cleanest available diesel equipment.

CARB maintains a Zero-Emission Equipment List identifying eligible equipment models, and it provides guidance to awarded bodies on how to integrate clean construction criteria into bid specifications and contract documents.[15] To participate in the CCC program and earn project recognition, if the following equipment types are used in the Project, the POLB would be required to use the following zero-emission off-road equipment:

- Aerial lift (scissor and personnel)
- Compact/mini excavator (up to 15,000 pounds operating weight)
- Compact/mini track and wheel loaders (up to 15,000 pounds operating weight)
- Dumper/buggy
- Forklift (up to 5,000 pounds lift capacity)
- Light cart/tower/stand
- Power generation systems, Battery Energy Storage Systems, and hybrid gensets
    - On project diesel generators are only allowed if incorporated into hybrid genset systems (as defined in the program section titled Definitions)
- Tampers/mini-compacters/mini-rollers
- Walk-behind concrete saw

In addition to participating in the CCC program, CARB urges the POLB to include the following recommended emission reduction strategies as project design features in the DEIR.

- Ensure the cleanest possible construction practices and equipment are used. This includes eliminating the idling of diesel-powered equipment and providing the necessary infrastructure (e.g., electrical hookups) to support zero and near-zero equipment and tools.
- In construction contracts, require all off-road diesel-powered equipment used during construction to be equipped with Tier 4 Final engines with a diesel particulate filter or

[15] California Clean Construction Program. Accessible at: *California Clean Construction Zero-Emission Equipment List | California Air Resources Board*.

cleaner engines, except for specialized construction equipment for which such engines are not available. Information on finding Tier 4 final equipment with diesel particulate filter is available on CARB's website.[16]

- In construction contracts, require that all off-road equipment with a power rating below 19 kilowatts (e.g., plate compactors, pressure washers) used during construction be battery powered.
- In construction contracts, require all heavy-duty trucks entering the construction site during the grading and building construction phases to be zero-emission where feasible; if zero-emission trucks are not feasible, trucks must be model year 2017 or later. All heavy-duty haul trucks should also meet CARB's lowest optional low-NOx standard. [17]

Conclusion

Given the Project's location within the AB 617-designated WCWLB community, the POLB has a critical responsibility to ensure its development does not further burden residents with toxic air pollution. To this end, the Project should serve as a model for modern, zero-emission logistics and commercial development. CARB strongly urges the POLB to incorporate the emission reduction measures provided in this letter.

CARB appreciates the opportunity to comment on the NOP for the DEIR. Given the breadth and scope of projects subject to CEQA review throughout California that have air quality and GHG 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 on which CARB does not submit substantive comments.

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[16] Optional Tier 4 Final + Diesel Particulate Filter Equipment. Accessible at *Optional Tier 4 Final + Diesel Particulate Filter Equipment* | California Air Resources Board.

[17] 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*

CARB staff can provide assistance with zero-emission technologies and emission reduction strategies, as needed. Please include CARB on your list of selected State agencies that will receive the DEIR. 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

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