

DEPARTMENT OF TRANSPORTATION

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7/2/2020

Governor's Office of Planning & Research

Jul 07 2020

*Making Conservation
a California Way of Life.*

July 7, 2020

STATE CLEARINGHOUSE

John Carver
Planning Director
City of Paramount
16400 Colorado Avenue
Paramount, CA 90723

RE: Paramount Petroleum Alt-Air
Renewable Fuels Project – Notice
of Preparation (NOP)
SCH # 202006901
GTS # 07-LA-2020-03279
Vic. LA-19/PM: 7.653

Dear John Carver:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-mentioned project's Notice of Preparation (NOP). The modifications to the Renewable Fuels Project will convert the Paramount crude oil refinery into a renewable fuels production facility, eliminating the refining of crude oil. The project modifications will include a new Pretreat Unit, modifications to the existing Renewables Fuels Units, a new Renewable Fuels Unit, a new Hydrogen Generation Unit, a new Hydrogen Recovery Unit, a new Propane Recovery Unit, upgrades to the existing wastewater treatment system, a new Hydrogen Sulfide Recovery Unit, a second Sour Water Stripper, a new flare, modifications to the truck and rail loading/unloading racks, and new pipelines within the facility. In addition, some existing tanks will be upgraded/repared and be permitted to handle different products (e.g., non-edible vegetable oils and beef tallow). The Project also includes utilizing two existing 55,000-barrel storage tanks at the Lakewood Tank Farm.

Under Senate Bill 743 (2013), CEQA review of transportation impacts of a proposed development are adapting to eliminate consideration of delay-and capacity-based metrics such as level of service (LOS) and are instead focusing analysis on another metric of impact, "Vehicle Miles Traveled (VMT)". Effective July 1st, 2020, Caltrans is replacing LOS with VMT when evaluating traffic impacts.

For any future project, like the proposed SEIR, we encourage the Lead Agency to adopt or develop a verifiable performance-based Vehicle Miles Travelled (VMT) criteria as required by SB 743.

After reviewing the project's NOP Caltrans has the following comments:

- The NOP indicates that a potentially significant impact may occur to the transportation/circulation system. In the future SEIR please consider including a Construction Traffic Management Plan and Truck Haul Route Program for Caltrans approval.

- Please consider including a VMT analysis that looks at potential safety concerns to Caltrans facilities as part of the proposed SEIR.
- If the project develops VMT analysis please consider utilizing the latest version of the Technical Advisory and Guidelines on Evaluating Transportation Impacts in CEQA by the Governor's Office of Planning and Research, and the latest version of Caltrans' Transportation Impact Study Guide (TISG).
- Please consider scheduling the construction working hours during off peak hours to the maximum extent possible. This may minimize congestion and provide higher levels of safety to the pedestrians and vehicular traffic on the streets and freeway.

Further information included for your consideration:

Please consider integrating transportation and land use in a way that reduces VMT and Greenhouse Gas (GHG) emissions by facilitating the provision of more proximate goods and services to shorten trip lengths and achieve a high level of non-motorized travel and transit use.

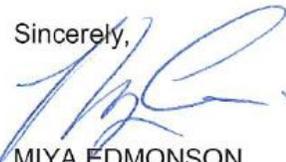
Caltrans seeks to promote safe, accessible multimodal transportation. Methods to reduce pedestrian and bicyclist exposure to vehicles improves safety by lessening the time that the user is in the likely path of a motor vehicle. Caltrans recommends the project consider the use of methods such as, but not limited to, the construction of physically separated facilities such as sidewalks, raised medians, refuge islands, and off-road paths and trails, or a reduction in crossing distances through roadway narrowing.

Additionally, pedestrian and bicyclist warning signage, flashing beacons, crosswalks, signage and striping can be used to indicate to motorists that they should expect to see and yield to pedestrians and bicyclists. Visual indication from signage can be reinforced by road design features such as lane widths, landscaping, street furniture, and other design elements.

Also, storm water run-off is a sensitive issue for Los Angeles County. Please be mindful that projects should be designed to discharge clean run-off water. Discharge of storm water run-off is not permitted onto State Highway facilities without a storm water management plan.

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

If you have any questions regarding these comments, please contact project coordinator Reece Allen, at reece.allen@dot.ca.gov and refer to GTS# 07-LA-2020-03279

Sincerely,


MIYA EDMONSON
IGR/CEQA Branch Chief
cc: Scott Morgan, State Clearinghouse