

**DEPARTMENT OF TRANSPORTATION**

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*Making Conservation  
a California Way of Life*

Governor's Office of Planning & Research

May 24, 2021

**May 24 2021**

**STATE CLEARINGHOUSE**

Ms. Erin Sheehy  
Harbor Department  
City of Los Angeles  
425 S. Palos Verdes Street  
San Pedro, CA 90731

RE: Berth 163-164 Marine Oil Terminal  
Wharf Improvement Project  
Vic. LA-110/PM 2.8, LA-01/PM 10.54  
SCH # 2021050263  
GTS # LA-2021-03589AL-MND

Dear Ms. Sheehy:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The wooden wharf will be replaced with a new, concrete wharf and associated equipment to comply with Marine Oil Terminal Engineering and Maintenance Standards seismic and safety standards.

The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. Senate Bill 743 (2013) has been codified into CEQA law. It mandates that CEQA review of transportation impacts of proposed developments be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts. As a reminder, Vehicle Miles Traveled (VMT) is the standard transportation analysis metric in CEQA for land use projects after the July 1, 2020 statewide implementation date. You may reference The Governor's Office of Planning and Research (OPR) website for more information.

<http://opr.ca.gov/ceqa/updates/guidelines/>

Also, Caltrans has published the VMT-focused Transportation Impact Study Guide (TISG), dated May 20, 2020 and Caltrans Interim Local Development Intergovernmental Review Safety Review Practitioners Guidance, prepared on December 18, 2020.

<https://dot.ca.gov/programs/transportation-planning/office-of-smart-mobility-climate-change/sb-743>

In the Draft Initial Study and Negative Declaration, it states that “the Office of Planning and Research (OPR) has confirmed that heavy-duty truck trips need not be included in this transportation analysis, but are analyzed in other resource areas, such as Air Quality, Greenhouse Gas Emissions, Energy, and Noise (OPR, 2020)....Construction of the proposed Project would generate approximately 40 vehicle trips during a peak day, and operation would not generate more trips than under baseline conditions because there would be no additional employees.”

The document also states that “the Los Angeles City Council approved the LADOT Transportation Assessment Guidelines for CEQA projects in July 2019 (LADOT, 2019). These guidelines state that a VMT analysis is not required if a project generates less than 250 daily trips. The LADOT threshold is proposed for automobiles (as OPR does not require VMT analysis of commercial trucks in CEQA documents). Therefore, based on OPR verbal guidance, heavy-duty truck trips are not included in this transportation analysis, but are analyzed in other resource areas, such as Air Quality, Greenhouse Gas Emissions, Noise, and Energy. (OPR, 2020).”

For this project, transportation of heavy construction equipment and/or materials, which requires the use of oversized-transport vehicles on State highways, will require a transportation permit from Caltrans. It is recommended that large size truck trips be limited to off-peak commute periods and idle time not to exceed 10 minutes.

If you have any questions, please feel free to contact Mr. Alan Lin the project coordinator at (213) 269-1124 and refer to GTS # LA-2021-03589AL-MND.

Sincerely,

*Frances Duong*

FRANCES DUONG  
Acting IGR/CEQA Branch Chief

email: State Clearinghouse