

DEPARTMENT OF TRANSPORTATION

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April 4, 2022

Governor's Office of Planning & Research

Apr 04 2022

STATE CLEARINGHOUSE

Lisa Wunder
Los Angeles Harbor Department
425 South Palos Verdes Street
San Pedro, CA 90731

RE: Berth 191-194 (Ecocem) Low-Carbon
Cement Processing Facility Project
Notice of Preparation (NOP)
SCH # 2022030294
Vic. LA-Multiple
GTS # 07-LA-2022-03885

Dear Lisa Wunder:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced NOP. The project involves construction and operation of a new processing facility on the backlands adjacent to Berths 192-194 that would import raw materials by ship and truck to produce a low-carbon binder (an alternative to Portland cement) and load third-party trucks that would transport the product to local consumers. The Los Angeles Harbor Department is the Lead Agency under the California Environmental Quality Act (CEQA).

The nearest State facilities to the proposed project are State Route 1, 47, 103, I-110, and I-710. After further review of the NOP, Caltrans has the following comments:

Caltrans concurs with the submitted NOP that an EIR should be prepared for this proposed project. The project may conduct its own analysis to determine significant traffic safety impact. Currently no significant impact is indicated for the NOP however if potential safety impacts are identified during the EIR, the following preferred traffic safety impact mitigation may be recommended as mitigation:

- Transportation demand management program(s) to reduce the traffic safety impacts, which may include increased transit access, commute trip reductions such as rideshare programs, shared mobility facilities (bicycle or vehicular), increased bicycle and pedestrian infrastructure.
- Investments to existing active transportation infrastructure, or transit system amenities (or expansion) to reduce the project's traffic safety impacts; and/or

- Potential change(s) to the intersection operations including, but not limited to lane reassignment, traffic signalization, signal phasing or timing modifications, turn lane extensions to mitigate safety impacts from project traffic;
- Any proposed changes to any infrastructure within Caltrans right of way will require an encroachment permit. This work will require additional review and may be subject to additional requirements to ensure current design standards and access management elements are being addressed.

According to the Initial Study:

1. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities will have no impact.
2. Conflict or inconsistency with CEQA Guidelines section 15064.3, subdivision (b) will have no impact.
3. Substantially increased hazards because of a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment) will have no impact.
4. Result in inadequate emergency access will have a less than significant impact.

Per the Initial Transportation/Traffic Study, the project is presumed to have a less than significant VMT impact due to multiple factors, primarily because it would not generate near the 250 daily automobile trips threshold. However, this project does expect an increase of 112 freight vehicle trips per day (roughly 35,000 annually) directly related to its operation.

The project also includes an 18-month construction schedule prior to normal operation, during which time there will be increased traffic due to material deliveries and soil hauling (both imports and exports).

To better assess the impact this increase of heavy vehicle traffic will have on the I-710/Anaheim Street on- and off-ramps (and nearby state facilities) it is requested that the owner/developer/contractor provide both construction hauling routes and expected hauling routes of their operational imports/exports.

If there are any significant traffic-related impacts, the implementation of multimodal mitigation measures and other Traffic Demand Management (TDM) should be considered to reduce the number of vehicle trips generated by the project thereby eliminating or minimizing traffic safety impacts. Also, traffic synchronization and other Traffic System management (TSM) should be considered to improve the flow of traffic.

We look forward in reviewing the Project's Environmental Impact Report (EIR). Any work that will be done within the State Right of Way (ROW) will need an encroachment permit. No further action is recommended at this time.

The following information is included for your consideration.

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 codified into CEQA law and mandated that CEQA review of transportation impacts of proposed development be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts for all future development projects. You may reference the Governor's Office of Planning and Research (OPR) for more information:

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

As a reminder, VMT is the standard transportation analysis metric in CEQA for land use projects after July 1, 2020, which is the statewide implementation date.

You can also refer to the 2010 *Quantifying Greenhouse Gas Mitigation Measures* report by the California Air Pollution Control Officers Association (CAPCOA), which is available online at:

<http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

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, please feel free to contact Karen Herrera, the project coordinator, at Karen.Herrera@dot.ca.gov and refer to GTS # 07-LA-2022-03885.

Sincerely,



MIYA EDMONSON
LDR Branch Chief

cc: State Clearinghouse