

Section 3.8 Ground Transportation

1
2
3

4 SECTION SUMMARY

5 Section 3.8, Ground Transportation, provides the following:

- 6 • A description of existing ground transportation conditions in the study area;
- 7 • A description of applicable program and regulations regarding ground transportation;
- 8 • A discussion on the methodology used to determine whether the Proposed Project or
9 alternatives would result in significant impacts on ground transportation;
- 10 • An impact analysis of the Proposed Project and alternatives; and
- 11 • A description of feasible mitigation measures proposed to reduce significant adverse impacts,
12 as applicable.

13 Key Points of Section 3.8

14 Impacts of the Proposed Project were qualitatively assessed in relation to potential conflicts with area
15 plans, design features, and emergency access, and quantitatively assessed for the vehicle miles traveled
16 (VMT) indexed to the number of employees as prescribed in the Los Angeles Department of
17 Transportation's (LADOT) Transportation Assessment Guidelines (LADOT 2022). The VMT analysis
18 required for purposes of CEQA is focused on employee-generated auto trips related to the Project, not on
19 heavy-duty drayage trucks serving the Ecocem Facility. However, for informational purposes, this Draft
20 Environmental Impact Report (EIR) includes a qualitative discussion of the potential effects of Project-
21 related truck traffic on local roadways (see Section 3.8.6).

22 The Proposed Project and both alternatives would not conflict with local or regional plans or policies
23 related to circulation, would not increase roadway hazards, and would not result in inadequate emergency
24 access. Impacts of the Proposed Project and the alternatives related to auto VMT would be less than
25 significant, and no mitigation is required.

3.8.1 Introduction

Transportation impacts associated with construction and operation of the Proposed Project and alternatives are assessed by their effect on ground transportation resources in the immediate area of the Proposed Project and the surrounding region. This section provides a summary of the transportation impact analysis. The transportation analysis includes assessment of:

- Potential conflicts with programs, plans, ordinances, or policies addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities;
- Vehicle miles traveled conditions;
- Hazards due to a geometric design feature or incompatible use; and
- Emergency access.

3.8.2 Environmental Setting

The Proposed Project would generate vehicular traffic as a result of employee commutes and truck trips transporting the facility's product (ground granulated blast furnace slag [GGBFS], a low-carbon construction binder). Formerly occupied by a succession of water-related uses, including a yacht club, a terminal for steamship passengers, and small tank farms, the site is now largely vacant. Although, a small portion of the site is occupied by a boat restoration operation, loading and unloading of supplies for barges, tugs, and work vessels, and a Port equipment storage site. As such, the CEQA baseline of the site includes no transportation activity.

The Project site is located at Berth 191 and in the backlands of Berths 192-194 in the Port of Los Angeles and is northeast of Mormon Island. The Project site is within the Port of Los Angeles Community Plan area in the City of Los Angeles, which is adjacent to the communities of San Pedro and Wilmington, and approximately 20 miles south of downtown Los Angeles.

Access to and from the current, vacant Project site is provided by a network of arterial routes and freeways. Local access is provided by Avalon Boulevard, Canal Street, and Yacht Street. The arterial street network that serves the Proposed Project area includes: Harry Bridges Boulevard, Figueroa Street, Alameda Street, and Henry Ford Avenue. The freeway network consists of the Harbor Freeway (Interstate [I]-110), the Long Beach Freeway (I-710), and the Terminal Island Freeway (State Route [SR]-103/SR-47).

3.8.3 Applicable Regulations

Transportation analysis in the state of California is guided by policies and standards set at the state level under the California Environmental Quality Act (CEQA) Guidelines and local jurisdictions as lead agencies. Since the Proposed Project is in the City of Los Angeles, it would adhere to the City's adopted Los Angeles Department of Transportation, Transportation Assessment Guidelines.

3.8.4 Impacts and Mitigation Measures

3.8.4.1 Methodology

Impacts of the Proposed Project were qualitatively assessed relative to potential conflicts with area plans, design features, and emergency access, and quantitatively assessed relative to VMT as prescribed by the LADOT Transportation Assessment Guidelines (LADOT 2022). The VMT analysis is therefore applicable for the CEQA assessment of the Project's potential transportation impacts.

Automobile Vehicle Miles Traveled Analysis

The Port of Los Angeles is an integral participant in regional collaboration for air quality and transportation conformity, achievement of Senate Bill (SB) 375 greenhouse gas emissions targets, and other long range transportation planning activities. The baseline and future forecasted conditions for the Port of Los Angeles and assessed as part of the Southern California Association of Governments Regional (SCAG) Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The parent model of the PortTAM travel model is the SCAG RTP/SCS travel demand model developed using the TransCAD software. It includes several of the same assumptions for regional population, employment and transportation system growth and contains key elements of the PorTAM model.

Employee trip lengths used for mass emission analysis were extracted from the Port of Los Angeles's PortTAM.

Table 3.8-1 shows the automobile VMT per trip for the baseline, Proposed Project, and alternatives as derived from the PortTAM Model. The analysis assumes two daily one-way trips per employee during a working year of 350 days.

Table 3.8-1: Orcem Project Employee Autos Trip Generation

Activity	CEQA Baseline	Proposed Project	Alternative 1 No Project Alternative	Alternative 2 Reduced Project	Alternative 3 Product Import Terminal
Work Force (number of employees)	0	26	0	26	12
Daily Auto Trips (one-way trips/day)	0	52	0	52	24
Annual Auto Trips (one-way trips/year)	0	18,200	0	18,200	8,400
Average trip length (VMT, miles/one-way trip)	N/A	10.1	N/A	10.1	10.1

3.8.4.2 CEQA Baseline

The Project site is currently vacant with limited to no automobile or vehicular activity. Accordingly, the number of auto trips in the baseline is zero.

3.8.4.3 Thresholds of Significance

A project in the Port is considered to have a significant transportation/circulation impact if the project would result in one or more of the following occurrences. These criteria are based on the CEQA Guidelines Appendix G and the LADOT Transportation Assessment

1 Guidelines (LADOT 2022), are used as the basis for determining the impacts of the
2 Proposed Project and alternatives under CEQA.

3 **TRANS – 1: Would the Project conflict with a program, plan, ordinance or policy**
4 **addressing the circulation system, including transit, roadway, bicycle**
5 **and pedestrian facilities?**

6 The LADOT Transportation Assessment Guidelines state that a project that “generally
7 conforms with and does not obstruct the City’s development policies and standards will
8 generally be considered to be consistent” and are not in conflict with applicable
9 programs, plans, ordinances, or policies addressing the circulation system. The LADOT
10 Guidelines provide three screening criteria questions that must be answered in order to
11 determine a project’s potential impacts under this threshold and whether the project
12 conflicts with City circulation policies:

- 13 • Does the project require a discretionary action that requires the decision maker to
14 find that the project would substantially conform to the purpose, intent, and
15 provisions of the General Plan?
- 16 • Is the project known to directly conflict with a transportation plan, policy, or
17 program adopted to support multimodal transportation options or public safety?
- 18 • Is the project required to or proposing to make any voluntary modifications to the
19 public right-of-way (i.e., dedications and/or improvements in the right-of-way,
20 reconfigurations of curb line, etc.)?

21 If the answer is “no” to all of these questions, a “no impact” determination can be made.

22 **Project Construction Screening Criteria**

23 The LADOT Transportation Assessment Guidelines Section 3.4 addresses the analysis of
24 Project construction and includes screening criteria for activities associated with Project
25 construction and major in-street construction of infrastructure projects.

26 If the answer is “yes” to any of the following questions, further analysis would be
27 required in this document to assess whether the Project or Project construction could
28 negatively affect existing pedestrian, bicycle, transit, or vehicle circulation:

- 29 • Would the project require construction activities to take place within the right-of-
30 way of a Boulevard or Avenue (as designated in the City’s Mobility Plan 2035)
31 which would necessitate temporary lane, alley, or street closures for more than
32 one day (including day and evening hours, and overnight closures if on a
33 residential street)?
- 34 • Would the project require construction activities to take place within the right-of-
35 way of a Collector or Local Street (as designated in the City’s Mobility Plan
36 2035) which would necessitate temporary lane, alley, or street closures for more
37 than seven days (including day and evening hours, and including overnight
38 closures if on a residential street)?
- 39 • Would in-street construction activities result in the loss of regular vehicle,
40 bicycle, or pedestrian access, including loss of bicycle parking to an existing land
41 use for more than one day, including day and evening hours and overnight
42 closures if access is lost to residential units?

- 1 • Would in-street construction activities result in the loss of regular Americans
2 with Disabilities Act (ADA) pedestrian access to an existing transit station, stop,
3 or facility (e.g., layover zone) during revenue hours?
- 4 • Would in-street construction activities result in the temporary loss for more than
5 one day of an existing bus stop or rerouting of a bus route that serves the project
6 site?
- 7 • Would construction activities result in the temporary removal and/or loss of on-
8 street metered parking for more than 30 days?
- 9 • Would the project involve a discretionary action to construct new buildings or
10 additions of more than 1,000 square feet that require access for hauling
11 construction materials and equipment from streets of less than 24-feet wide in a
12 hillside area?

13 **TRANS – 2: Would the Project conflict or be inconsistent with CEQA Guidelines**
14 **section 15064.3, subdivision (b)(1)?**

15 CEQA Guidelines Section 15064.3 subdivision (b)(1), provides criteria for analyzing
16 transportation impacts. The Guidelines state that a significant impact may occur if vehicle
17 miles traveled (VMT) exceed an applicable threshold of significance. The section defines
18 "vehicle miles traveled" for home-work trips (employee commute trips) as the amount
19 and distance of automobile travel attributable to a project (Guidelines § 15064.3, subd.
20 (a)). While heavy-duty trucks could be included for modeling convenience, that analysis
21 is not required under CEQA. Therefore, for the purposes of this analysis and as required
22 by CEQA, the VMT analysis for this Project focuses on employee auto trips related to the
23 Project, not on trips by heavy-duty drayage trucks. However, because the City has
24 discretion to choose its methodology for analyzing such impacts, this EIR) analyzes
25 impacts of these drayage vehicles on other resource areas within their respective chapters,
26 including the Air Quality, Greenhouse Gas Emissions, Noise, and Energy chapters. This
27 EIR also includes a qualitative vehicular circulation assessment for informational
28 purposes, and as contemplated by Guidelines § 15064.3.

29 The intent of Section 15064.3 and Threshold T-2.1 in the 2022 LADOT Transportation
30 Assessment Guidelines is to assess whether a land use or office project would have a
31 potential impact. Two screening criteria questions must be answered in order to
32 determine consistency with Section 15064.3, and the 2022 LADOT Transportation
33 Assessment Guidelines state that if the answer is “no” to either question, then further
34 analysis will not be required for this threshold, and a “no impact” determination can be
35 made.

36 (1) Would the land use project generate a net increase of 250 or more daily
37 vehicle trips?

38 (2) Would the project generate a net increase in daily VMT?

39 The LADOT threshold of 250 daily vehicle trips was proposed for automobiles (as OPR
40 does not require VMT analysis of commercial trucks in CEQA documents).

41 **TRANS – 3: Would the Project substantially increase hazards due to a geometric**
42 **design feature (e.g., sharp curves or dangerous intersections) or**
43 **incompatible uses (e.g., farm equipment)?**

1 The LADOT Transportation Assessment Guidelines provide two screening criteria
 2 questions that must be answered in order to determine assess whether the Project would
 3 result in impacts due to geometric design hazards or incompatible uses.

- 4 • Is the project proposing new driveways, or introducing new vehicle access to the
 5 property from the public right-of-way?
- 6 • Is the project proposing to make any voluntary or required modifications to the
 7 public right-of-way (i.e., street dedications, reconfigurations of curb line, etc.)?

8 In addition to the screening questions above, if the answer is “yes” to all of the following
 9 questions, further analysis will be required to assess whether the project would result in
 10 impacts due to queuing from a freeway off-ramp that could lead to unsafe differential
 11 travel speeds:

- 12 • Does the land use project involve a discretionary action that would be under
 13 review by the Department of City Planning?
- 14 • Would the land use project generate a net increase of 250 or more daily vehicle
 15 trips?
- 16 • Would the land use project add 25 or more trips to any off ramp in either the
 17 morning or afternoon peak hour?

18 **TRANS – 4: Would the Project result in inadequate emergency access?**

19 The LADOT Transportation Assessment Guidelines do not provide guidance for the
 20 assessment of inadequate emergency access, however this analysis includes a
 21 determination based on any potential modifications to baseline emergency access to the
 22 Project site, including alterations to the existing configuration of local access roads or
 23 blocking any access points.

24 **TRANS – 5: Would the Project result in a change in marine vessel traffic 25 patterns, including either an increase in traffic levels or a change in location that 26 results in substantial safety risks?**

27 The Initial Study/Notice of Preparation (IS/NOP) for the Proposed Project concluded that
 28 the addition of 24 vessels would constitute a small fraction of anticipated future Port
 29 vessel traffic. Additionally, given the navigational safety procedures and systems
 30 currently in place, the addition of these vessels would not require a change in vessel
 31 traffic patterns or increase safety risks. Because the Proposed Project would not require a
 32 change in vessel traffic patterns of increase safety risks, the IS/NOP determined that
 33 impacts would be less than significant. Accordingly, this issue is not discussed further in
 34 the Draft EIR.

35 **3.8.4.4 Impact Determination**

36 **Proposed Project**

37 **Impact TRANS-1: Would the Proposed Project conflict with a 38 program, plan, ordinance or policy addressing the circulation 39 system, including transit, roadway, bicycle and pedestrian facilities?**

40 The Proposed Project does not result in any conflict with the existing City Mobility
 41 Element of the General Plan nor does it have any impacts on transit, roadway, bicycle,
 42 and pedestrian facilities as demonstrated in the previous discussion pertaining to vehicle

1 trips. The Proposed Project requires approval by the Board of Harbor Commissioners
2 which is by definition a discretionary action. However, this discretionary action does not
3 require the decisionmaker to amend any project component to conform to the purpose,
4 intent, or provision of any City General Plan. Therefore, the Proposed Project would
5 comply with all required City Plans. In addition, the Proposed Project would not alter
6 existing transportation routes or transportation options, nor would it alter access to public
7 safety.

8 The Proposed Project would not require any modifications or closures to the public right-
9 of-way and there would be no in-street construction activities. The Berth 200 Roadway
10 Expansion Project is planned for completion prior to the commencement of the
11 operations associated with the Proposed Project. The Los Angeles Harbor Department
12 (LAHD) does not foresee that this expansion project would conflict with the Proposed
13 Project. Further, the development and operation of the Proposed Project would not
14 prevent street closures that result from the construction of other projects. Therefore, the
15 Proposed Project would not directly conflict with a transportation plan, policy or program
16 adopted to support multimodal transportation options or public safety.

17 The Proposed Project does not include any modifications to existing roadways that
18 support current or future bike lanes or bus stops and is not required to make any
19 voluntary or required modifications to the public right-of-way. The Proposed Project does
20 not propose to include dedications or physical modifications to the public right-of-way,
21 nor is it required to make such modifications. There would be no in-street construction
22 activities as a result of the Project.

23 The Project is also consistent with the SCAG RTP/SCS as all of the Port of Los
24 Angeles's vehicle trips (truck and auto) are contained within the RTP model. Also it is
25 consistent, as the SCAG RTP/SCS states "SCAG supports a world-class, coordinated
26 Southern California goods movement system that accommodates growth in the
27 throughput of freight to the region and nation in ways that support the region's economic
28 vitality, attainment of clean air standards, and quality of life for our communities,"
29 (SCAG 2020). All responses to the screening criteria questions are "no." Accordingly,
30 the Project does not require further analysis of this criteria and therefore does not conflict
31 with a program, plan, ordinance or policy addressing the circulation system, including
32 transit, roadway, bicycle and pedestrian facilities.

33 **Project Construction Screening Criteria**

34 The Proposed Project's construction activities would be primarily limited to the site
35 boundaries and would not enter into any right-of-way. Existing access to the site would
36 be maintained during construction by adherence to a project-specific traffic management
37 plan approved by LAHD. Pedestrian access, bus routes, and metered parking do not exist
38 on the streets adjacent to the site.

- 39 • Would the project require construction activities to take place within the right-of-
40 way of a Boulevard or Avenue (as designated in the Mobility Plan 2035) which
41 would necessitate temporary lane, alley, or street closures for more than one day
42 (including day and evening hours, and overnight closures if on a residential
43 street)? **No, the Project would not require construction activities to take**
44 **place within the right-of-way of a Boulevard or Avenue.**
- 45 • Would the project require construction activities to take place within the right-of-
46 way of a Collector or Local Street (as designated in the Mobility Plan 2035)
47 which would necessitate temporary lane, alley, or street closures for more than

1 seven days (including day and evening hours, and including overnight closures if
2 on a residential street)? **No, the Project would not require construction**
3 **activities to take place within the right-of-way of a Collector or Local Street.**

- 4 • Would in-street construction activities result in the loss of regular vehicle,
5 bicycle, or pedestrian access, including loss of bicycle parking to an existing land
6 use for more than one day, including day and evening hours and overnight
7 closures if access is lost to residential units? **No, the Project would not include**
8 **in-street construction activities.**
- 9 • Would in-street construction activities result in the loss of regular ADA
10 pedestrian access to an existing transit station, stop, or facility (e.g., layover
11 zone) during revenue hours? **No, because the Project would not include in-**
12 **street construction activities, there would be no loss of ADA pedestrian**
13 **access to an existing transit station, stop, or facility during revenue hours.**
14 **Additionally, there is no bus service on the adjacent roadways.**
- 15 • Would in-street construction activities result in the temporary loss for more than
16 one day of an existing bus stop or rerouting of a bus route that serves the project
17 site? **No, the Project construction activities would not result in the**
18 **temporary loss of an existing bus stop or rerouting of a bus route as there is**
19 **no bus service on the adjacent roadways.**
- 20 • Would construction activities result in the temporary removal and/or loss of on-
21 street metered parking for more than 30 days? **No, the Project construction**
22 **activities would not result in the temporary loss of on-street metered**
23 **parking as there is no metered parking available on the adjacent roadways.**
- 24 • Would the project involve a discretionary action to construct new buildings or
25 additions of more than 1,000 square feet that require access for hauling
26 construction materials and equipment from streets of less than 24- feet wide in a
27 hillside area? **No, the Project construction activities would not require access**
28 **for hauling construction materials from streets less than 24-feet wide in a**
29 **hillside area.**

30 **Impact Determination**

31 Because the Proposed Project would not conflict with an established program, plan,
32 ordinance or policy addressing the circulation system, including transit, roadway, bicycle
33 and pedestrian facilities, there would be no impacts associated with the Project
34 construction or operations. Also as described in Section 3.8.6, infrastructure to improve
35 pedestrian access to and from the Wilmington Waterfront area is currently under
36 construction and is scheduled to be completed by 2027. The Proposed Project would be
37 located east of those pedestrian facilities and would therefore not have any impact.

38 **Mitigation Measures**

39 No mitigation is required.

40 **Residual Impacts**

41 There would be no impacts.

1 **Impact TRANS-2: Would the Proposed Project conflict or be**
2 **inconsistent with CEQA Guidelines section 15064.3, subdivision**
3 **(b)(1)?**

4 The Proposed Project operation would not generate more than 52 additional automobile
5 trips per day from the maximum of 26 employees to the site. That number of trips is
6 much lower than the LADOT Transportation Assessment Guidelines threshold of 250 or
7 more daily automobile vehicle trips (LADOT 2022) during operation of the Proposed
8 Project, and thus does not require further VMT analysis. While heavy-duty trucks could
9 be included for modeling convenience, that analysis is not required under CEQA.

10 Therefore, for the purposes of this analysis and as required by CEQA, the VMT analysis
11 for this Project focuses on employee auto trips related to the Project, not on trips by
12 heavy-duty drayage trucks. Although the VMT analysis is not required, it should be noted
13 that the estimated average employee commute trip of 10.1 miles is less than the LADOT
14 Transportation Assessment Guidelines prescribed impact threshold amount of 12.3 miles.

15 **Impact Determination**

16 The Proposed Project would generate less than 250 daily home-to-work vehicle trips and
17 the average employee trip length would be less than the LADOT threshold cited above.
18 Therefore, there would be no impacts.

19 ***Mitigation Measures***

20 No mitigation is required.

21 ***Residual Impacts***

22 There would be no impacts.

23 **Impact TRANS-3: Would the Proposed Project substantially increase**
24 **hazards due to a geometric design feature (e.g., sharp curves or**
25 **dangerous intersections) or incompatible uses (e.g., farm**
26 **equipment)?**

27 The Proposed Project's construction activities would be primarily limited to the site
28 boundaries and would not enter into the right-of-way. Existing access to the site would be
29 maintained by adherence to a project-specific construction traffic management plan that
30 would be approved by LAHD. Pedestrian access, bus routes, and metered parking do not
31 exist on the streets adjacent to the site.

32 The Proposed Project's access driveways are designed to safely accommodate large
33 trucks without any impacts to the public right of way. Also, as previously discussed, the
34 Proposed Project is not proposing or required to make any modifications to the public
35 right-of-way.

36 The Proposed Project does not involve a discretionary action that would be under review
37 by the Department of City Planning. Additionally, daily passenger vehicle trips to the site
38 during Proposed Project operation would not generate more than 52 additional
39 automobile trips per day from the maximum of 26 employees to the site. While there are
40 26 employees on site, it is unlikely that all employees would travel to/from the site during
41 peak hours.

1 **Impact Determination**

2 Because the Proposed Project would not cause changes to public rights-of-way relative to
3 the CEQA baseline, there would be no impacts.

4 ***Mitigation Measures***

5 No mitigation is required.

6 ***Residual Impacts***

7 There would be no impacts.

8 **Impact TRANS-4: Would the Proposed Project result in inadequate
9 emergency access?**

10 The Proposed Project would not alter or close existing roadways, the configuration of
11 local access roads, or block or emergency access points. Emergency access would
12 therefore remain adequate for the site, and impacts would be less than significant.

13 **Impact Determination**

14 Because the Proposed Project would not cause changes in emergency access relative to
15 the CEQA baseline, impacts would be less than significant.

16 ***Mitigation Measures***

17 No mitigation is required.

18 ***Residual Impacts***

19 There would be no impacts.

20 **Alternative 1 - No Project**

21 Under the No Project Alternative (Alternative 1), no facilities would be constructed at the
22 Project site and no operational activities beyond those occurring in the baseline would
23 take place. Accordingly, as described in Table 3.8-1, there would be no automobile trips
24 by worker vehicles. Therefore, there would be no impact.

25 **Alternative 2 – Reduced Project Alternative**

26 The Reduced Project Alternative (Alternative 2) would differ from the Proposed Project
27 in the amounts of raw materials and product that would be handled (530,000 tons of
28 ground granulated blast-furnace slag [GGBFS] per year rather than 775,000 tons).
29 However, because the number of employees would be the same, as described in Table
30 3.8-1, it would be identical to the Proposed Project in terms of number of worker
31 commutes. Furthermore, the physical modifications to the site would be the same as for
32 the Proposed Project. Therefore, impacts would be the same or less than those of the
33 Proposed Project.

34 **Alternative 3 – Product Import Terminal Alternative**

35 In the Product Import Terminal Alternative (Alternative 3), raw material storage,
36 handling, and milling facilities would not be built. Instead, the facility would consist
37 entirely of product storage and truck loading facilities. The facility would unload finished
38 product from vessels, store and handle it on site, and, like the Proposed Project, load
39 trucks for product distribution to the region. Although the facility's throughput would be
40 the same as the Proposed Project's (750,000 tons per year), it would not need as many

1 workers as the Proposed Project (12 versus 26), as shown in Table 3.8-1, with the result
2 that there would be fewer worker commute trips. Therefore, impacts would be the same
3 or less than those of the Proposed Project.

4 **3.8.4.5 Proposed Project and Alternatives Summary of Impact** 5 **Determinations**

6 Table 3.8-2 summarizes the impact determinations of the Proposed Project and
7 alternatives.

Table 3.8-2: Summary Matrix of Potential Impacts and Mitigation Measures for Ground Transportation Associated with the Proposed Project and Alternatives

Alternative	Environmental Impacts	Impact Determination	Applied Mitigation/Lease Measures or Controls	Residual Impacts
Proposed Project	TRANS-1: Would the Proposed Project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	No Impact	No mitigation is required	No Impact
	TRANS-2: Would the Proposed Project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	No Impact	No mitigation is required	No Impact
	TRANS-3: Would the Proposed Project substantially increase hazards due to a geometric design feature or incompatible uses?	No Impact	No mitigation is required	No Impact
	TRANS-4: Would the Proposed Project result in inadequate emergency access?	No Impact	No mitigation is required	No Impact
Alternative 1 – No Project	TRANS-1: Would Alternative 1 conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	No Impact	Not applicable	No Impact
	TRANS-2: Would Alternative 1 conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	No Impact	Not applicable	No Impact
	TRANS-3: Would Alternative 1 substantially increase hazards due to a geometric design feature or incompatible uses?	No Impact	Not applicable	No Impact
Alternative 2 – Reduced Project	TRANS-1: Would Alternative 2 conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	No Impact	No mitigation is required	No Impact
	TRANS-2: Would Alternative 2 conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	No Impact	No mitigation is required	No Impact
	TRANS-3: Would Alternative 2 substantially increase hazards due to a geometric design feature or incompatible uses?	No Impact	No mitigation is required	No Impact

Table 3.8-2: Summary Matrix of Potential Impacts and Mitigation Measures for Ground Transportation Associated with the Proposed Project and Alternatives

Alternative	Environmental Impacts	Impact Determination	Applied Mitigation/Lease Measures or Controls	Residual Impacts
Alternative 3 – Product Import Terminal	TRANS-1: Would Alternative 3 conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	No Impact	No mitigation is required	No Impact
	TRANS-2: Would Alternative 3 conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	No Impact	No mitigation is required	No Impact
	TRANS-3: Would Alternative 3 substantially increase hazards due to a geometric design feature or incompatible uses?	No Impact	No mitigation is required	No Impact

1 **3.8.4.6 Mitigation Monitoring**

2 Because the Proposed Project and the alternatives would not result in significant
3 transportation impacts under CEQA, there would be no mitigation measures requiring
4 monitoring.

5 **3.8.5 Significant Unavoidable Impacts**

6 There would be no significant and unavoidable impacts.

7 **3.8.6 Local Traffic Circulation (Informational)**

8 CEQA no longer requires that an EIR analyze the effects of a project's truck traffic on the
9 transportation system, but instead focuses on passenger vehicle travel. However,
10 comments on the (IS/NOP) for the Proposed Project expressed concern that the truck
11 traffic generated by the Proposed Project and alternatives would adversely affect
12 circulation in the vicinity of the Project. Accordingly, although not required by CEQA or
13 the City of Los Angeles CEQA guidelines, this Draft Environmental Impact Report (EIR)
14 presents, for informational purposes, an assessment of the potential effects of Project-
15 related truck traffic on local intersections and arterial road segments. The assessment of
16 roadway traffic operations was made by Port of Los Angeles (POLA) traffic engineers
17 using April 2023 traffic counts and a traffic operating conditions assessment, known as
18 level of service (LOS), provided by Caltrans (2023) for one of their on-going projects. As
19 shown in Table 3.8-3, all the adjacent intersections currently operate at an acceptable
20 LOS D or better except for Alameda Street/Anaheim Street during the afternoon peak
21 hour.

1 **Table 3.8-3. Year 2023 Intersection Operating Conditions**

Intersection	AM Peak Hour		2-3 PM		PM Peak Hour	
	Delay (sec/Vehicle)	LOS	Delay (sec/Vehicle)	LOS	Delay (sec/Vehicle)	LOS
I-110 ramps at John S Gibson Boulevard/W Harry Bridges Boulevard	26	C	25	C	25	C
Alameda Street/E Anaheim Street	49	D	41	D	80	E
E Anaheim Street/N Hendry Ford Avenue (SR-47)	39	D	22	C	42	D
Harry Bridges Blvd/Avalon Blvd	31	C	31	C	28	C
Harry Bridges Blvd/N Access Road	16	B	15	B	15	B

Source: Caltrans (2023)

Note: LOS Criteria as defined by the Highway Capacity Manual (TRB 2022):

Level of Service	Average Delay (sec/vehicle)	General Description
A	≤10	Free Flow
B	>10 - 20	Stable Flow (slight delays)
C	>20 - 35	Stable Flow (acceptable delays)
D	>35 - 55	Approaching Unstable Flow (tolerable delay, occasionally wait through more than one signal cycle to proceed)
E	E >55 - 80	Unstable Flow (intolerable delay)
F	F >80	Forced Flow (jammed)

2

3 **Table 3.8-4: Truck Trip Generation by the Proposed Project and Alternatives**

Activity	CEQA Baseline	Proposed Project	Alternative 1 – No Project Alternative	Alternative 2 – Reduced Project	Alternative 3 – Product Import Terminal
Annual Truck trips (one-way trips/year)	0	66,000	0	44,500	62,000
Daily Truck Trips (one-way trips/day)	0	263	0	178	248
Average trip length (VMT, miles/one-way trip)	0	73	N/A	73	73

Note: number of trips represent at-capacity operations of the facility.

Daily trips derived from annual trips divided by 50 weeks per year, 5 days per week.

4
5
6
7
8
9

Trucks serving the Proposed Project and the build alternatives (Reduced Project Alternative [Alternative 2] and Product Import Terminal Alternative [Alternative 3]) would use public roads within and outside the Port. These roads have been designed to accommodate heavy-duty trucks in terms of geometry, signal timing, signage, and pavement design. Additionally, LAHD is planning to construct the projects listed in Table 3.8-4 and depicted in Figures 3.8-1 through 3.8-3. Those projects will alter local

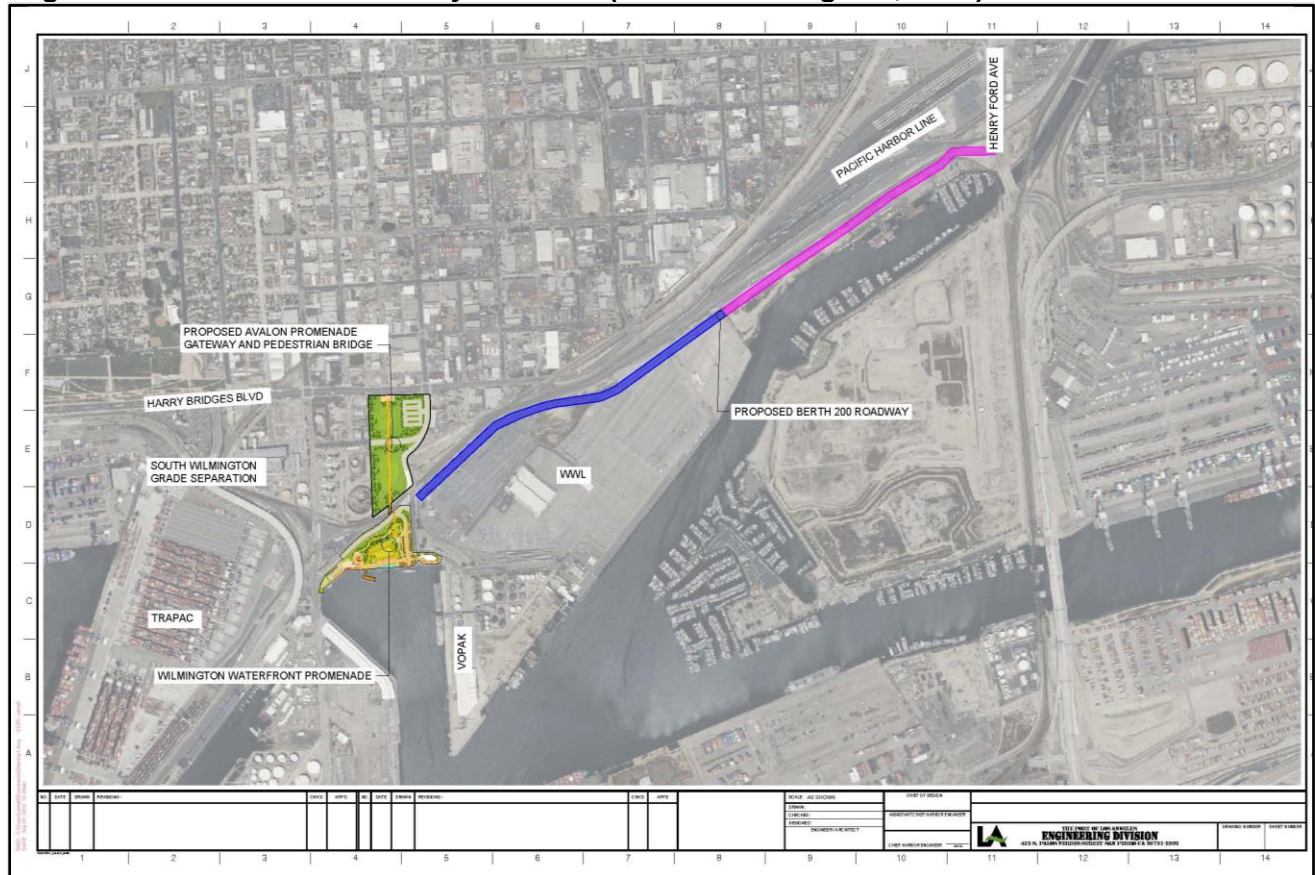
1 access routes and lessen truck traffic volumes on Avalon Boulevard and Harry Bridges
 2 Boulevard. For additional information, please see www.portoflosangeles.org/ceqa for
 3 environmental analyses of these projects.

Table 3.8-5: Planned Transportation Improvement Projects in the Project Area

Project	Construction Start	Construction Completion
Ecocem Project (operational Q1 2026)	07/2024	12/31/2025
Berth 200 Roadway ¹	06/2025	01/01/2027
Closed Avalon Bl., Harry Bridges Bl. to S. Broad Av. (part of Avalon Gateway project currently under design) ¹	03/2026	
Realigned Water Street ¹	Completed	
Closed Avalon Bl., S. Broad Av. to Water St.	12/31/2026	
Avalon Pedestrian Bridge & Gateway	12/2024	01/2027

Source: ¹Port of Los Angeles (2023)

4 **Figure 3.8-1. Berth 200 Roadway Site Plan (Port of Los Angeles, 2023)**



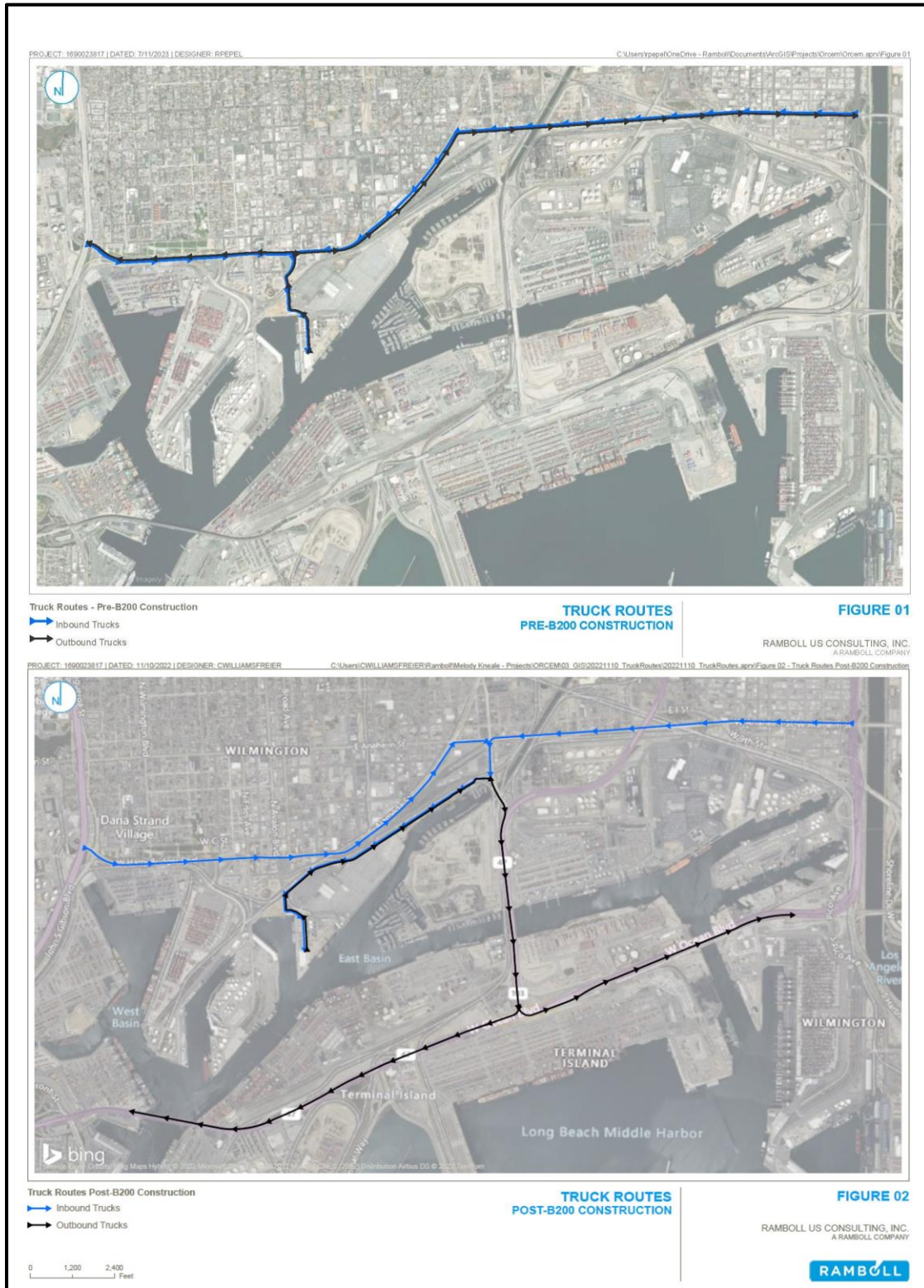
5

1 **Figure 3.8-2. Wilmington Waterfront Transportation Circulation (Port of Los Angeles,**
 2 **(2023)**



3
 4 During construction of the Proposed Project and during operations until the end of 2026, all Project-
 5 related traffic would use Avalon Boulevard (between Water Street and Broad Avenue), and Broad
 6 Avenue northerly to Harry Bridges Boulevard. This would help divert truck traffic from the Wilmington
 7 community recreational uses. In January 2027, project truck traffic would use the planned Berth 200
 8 Roadway (Figure 3.8-4-01). Traffic signage would be installed by LAHD to re-route truck traffic as
 9 shown in Figure 3.8-4-02. Furthermore, the projected low number of Project-generated daily auto and
 10 truck trips (and particularly during roadway peak hours) and the aforementioned LOS data provided by
 11 Caltrans (2023) indicate that traffic operating conditions on surrounding regional routes, such as Harry
 12 Bridges Boulevard (which is part of the federally designated National Highway Freight Network –
 13 Primary Highway Freight System), Henry Ford Avenue/Alameda Street, I-110 (via Ocean Boulevard),
 14 and I-710 (via Ocean Boulevard), would not be substantially affected by the Proposed Project.

1 **Figure 3.8-4: Orcem Truck Routes After Construction of the Berth 200 Roadway**



2
3

References

- 1
2
3 Caltrans. 2023. Year 2023 Traffic Operating Conditions. Unpublished data
4 communicated to LAHD. April.
- 5 LADOT (Los Angeles Department of Transportation). 2022. Transportation Assessment
6 Guidelines. [https://ladot.lacity.org/sites/default/files/documents/2020-transportation-](https://ladot.lacity.org/sites/default/files/documents/2020-transportation-assessment-guidelines_final_2020.07.27_0.pdf)
7 [assessment-guidelines_final_2020.07.27_0.pdf](https://ladot.lacity.org/sites/default/files/documents/2020-transportation-assessment-guidelines_final_2020.07.27_0.pdf).
- 8 Port of Los Angeles. 2023. Current Projects. [https://www.lawaterfront.org/invest/current-](https://www.lawaterfront.org/invest/current-port-projects)
9 [port-projects](https://www.lawaterfront.org/invest/current-port-projects).
- 10 SCAG (Southern California Association of Governments). 2020. The 2020-2045
11 Regional Transportation Plan/Sustainable Communities Strategy of the Southern
12 California Association of Governments. [https://scag.ca.gov/sites/main/files/file-](https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial-plan_0.pdf?1606001176)
13 [attachments/0903fconnectsocial-plan_0.pdf?1606001176](https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial-plan_0.pdf?1606001176).
- 14 Transportation Research Board. 2022. Highway Capacity Manual 7th Edition.