



COASTAL SAN PEDRO NEIGHBORHOOD COUNCIL

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April 20, 2022

Environmental Management Division
City of Los Angeles Harbor Department
425 S. Palos Verdes Street
San Pedro CA 90733-0151

Subject: Comments Submittal for the Notice of Preparation RE Berth 191-194 (Ecocem) Low-Carbon Cement Processing Facility Project

To whom it may concern,

The Coastal San Pedro Neighborhood Council requests that the Environmental Management Division consider the four Comments below for the Berth 191-194 (Ecocem) Low-Carbon Cement Processing Facility Project Notice of Preparation.

Due to the forecasted truck trips per year of 17,000 in 2025, 25,000 in 2026, and 35,000 in 2027, please include consideration of the resulting Transportation and Traffic impacts. As the NOP states that the trailer/tractors/18-wheel semi-trailer rigs would use designated truck routes in the Port area including Alameda Street, State Route 103, Henry Ford Avenue, the planned Berth 200 Roadway Extension, Avalon Boulevard, Water Street and Yacht Street, the following impacts will exceed reasonable expectations of the threshold of significance established under CEQA and require evaluation:

- The significant traffic impacts to the adjacent Harbor area communities currently highly affected by POLA heavy duty truck traffic;
- The likely consequential impact to the transit of freight on heavy duty trucks travelling to and from the Ports; and,
- The increased road maintenance on the referenced public roadways resulting from the heavy duty truck traffic serving the Project and the costs to the public.

As the proposed project includes outdoor storage of the Ecocem low-carbon binder product (ground granulated blast furnace slag), we request that physical covers or barriers be required over the product in storage and transit to minimize the potential for distribution of particulate matter by wind or other means and to reduce Air Quality impacts.

Further regarding Traffic and Air Quality Impacts, we request that a rail line or industrial side-track be included within the project to allow for closed hopper rail car transportation, thereby significantly reducing the traffic impacts, the air emissions from heavy duty trucks, and the particulate matter of the binder product more likely to escape if transported by truck.

We observe that the Cement Processing Facility proposed requires no immediate access to precious waterfront or harbor and is inconsistent with uses prevalent in the Tidelands Trust Area and as intended by the Public Trust Doctrine.

We will appreciate your consideration and response.

Sincerely,

A handwritten signature in black ink that reads "Douglas Epperhart". The signature is written in a cursive style with a long, sweeping horizontal line extending from the end of the name.

Doug Epperhart, President
On behalf of the Coastal San Pedro Neighborhood Council Board