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December 11, 2023

Ms. Lisa Wunder  
Interim Director  
Environmental Division  
Port of Los Angeles

Via: [ceqacomment@portla.org](mailto:ceqacomment@portla.org)

Dear Ms. Wunder,

Thank you for the opportunity to comment on the Ecocem project DEIR.

As outlined herein, the Central San Pedro Neighborhood Council voted that the “no project” alternative is the only feasible alternative due to the air quality, health risks, and traffic impacts. At the same time, we voted that a modification of Alternatives 2 and 3 to provide for import and throughput of the raw granulated blast furnace slag via rail car addresses those impacts and could be environmentally acceptable.

### THE “NO PROJECT” ALTERNATIVE

Granulated blast furnace slag [GBFS] is similar to sand. Ecocem proposes to grind the product into a very fine dust material similar to the cement used in concrete, and loading it onto trucks for distribution throughout southern California.

The import, grinding, storage, truck loading and truck transport of the very fine product produces considerable PM 10's [particles smaller than 10 microns in size] and PM 2.5's [smaller than 2.5 microns in size]. Particles that small can lodge in the lungs and can even pass cell walls in the lungs and lodge in the brain.

Table 3.1-13 in the DEIR shows the levels of the particle emissions for the years 2025, 2027, and 2049, and compares them with the AQMD threshold limits. **These are the predicted emissions after all feasible mitigations are applied and are for the project itself without including any ambient levels.** The predictions are based on what the levels would be at the property line. Predictions for what they would be in the surrounding area, from trucks and product dust for example, are not computed.

**Table 3.1-13: Maximum Localized Off-site Ambient PM<sub>10</sub> and PM<sub>2.5</sub> Concentrations — Proposed Project Operation**

Pollutant	Averaging Time	Analysis Years	Ground-Level Concentration (µg/m <sup>3</sup> ) <sup>a,d</sup>	SCAQMD Threshold (µg/m <sup>3</sup> ) <sup>b</sup>	Concentration above Threshold?
PM <sub>10</sub>	24-hour	2025	<b>10.9</b>	2.5	<b>Yes</b>
		2027	<b>21.6</b>	2.5	<b>Yes</b>
		2049	<b>21.5</b>	2.5	<b>Yes</b>
	Annual	2025 <sup>c</sup>	<b>1.6</b>	1	<b>Yes</b>
		2027	<b>7.0</b>	1	<b>Yes</b>
		2049	<b>7.0</b>	1	<b>Yes</b>
PM <sub>2.5</sub>	24-hour	2025	<b>3.3</b>	2.5	<b>Yes</b>
		2027	<b>6.6</b>	2.5	<b>Yes</b>
		2049	<b>6.6</b>	2.5	<b>Yes</b>

Notes:

<sup>a</sup> Exceedances of the thresholds are indicated in **bold**.

<sup>b</sup> Because the thresholds for PM<sub>10</sub> and PM<sub>2.5</sub> are incremental thresholds, background concentrations are not added to the Maximum Modeled Project Concentration.

<sup>c</sup> 2025 annual average concentrations include construction impacts from January 2025 through July 2025 and operational impacts from August 2025 through December 2025.

<sup>d</sup> 24-hr concentrations were evaluated for off-site locations where persons may be exposed to the emissions from project activities, based on SCAQMD's Final Localized Significance Threshold Methodology (SCAQMD 2008). Commercial and industrial land uses were conservatively included for all averaging times.

These emissions exceed the threshold standards by 60% up to 864%. This alone is sufficient to require a finding that the “no project” alternative is the only feasible alternative. There are a few others.

**Figure 3.1-2: Isoleths of 30-Year Residential Cancer Risk – Proposed Project**



Health risks are also a concern. CEQA does not require evaluating health risks unless they exceed more than 10 per million cancer cases. The DEIR found no cancer risk requiring an assessment. However, Figure 3.1–2 in the DEIR shows two risk outlines, one encompassing the project site as well as the adjacent Vopak terminal and another encompassing numerous residences in Wilmington, at least four terminals in the Port, plus the adjacent marinas. Given the claim that the project does not exceed the CEQA impact requirement, this should be clarified. The DEIR also ignores the considerable data available that shows various important pulmonary impacts, especially on workers and children, such as COPD and asthma.

The identified air quality impacts alone are more than enough to indicate the “no project” alternative should be selected as the only feasible alternative because, as the DEIR indicates, they cannot be mitigated to a level of insignificance.

There is also the impact of truck traffic. Large hopper trucks will be used to import gypsum to the site for use in the crushing process, and to transport finished products from the site to various locations, apparently mostly in Southern California. There will be approximately 66,000 truck trips per year, averaging 73 miles each trip, or about the distance from the site in Wilmington to San Bernardino.

Ecocem believes that CEQA does not require analysis of the environmental impact of these truck trips. They believe that analyzing the vehicle trips of their 26 employees is all that is required, and included those trips, averaging 10 miles each, in their DEIR.

They do address the truck transport issue but declare that it is for informational purposes only. See Section 3.8.6, starting at page 3.8-14. In doing so however, they counted each truck as if it were a regular vehicle and only calculated the impact of the level of service at intersections in and around Wilmington. This is called a “Level of Service” [LOS] analysis and they use it rather than the “Vehicle Miles Traveled” [VMT] method. The average one-way truck trip is estimated to be 73 miles, or 4,818,000 miles per year. Since they assert that VMT only applies to cars, not trucks, they don’t analyze the VMT for trucks.

Each truck is 72 feet long, length occupied by 2 1/2 cars. If the trucks are counted as if they were 2 1/2 cars each, it would impact on numerous intersections in around the area, degrading them to a level of service requiring modification of those intersections. Further, the informational limitation ignores things like impact on the neighborhood of the 263 hopper trucks rolling through the neighborhoods each day, ignores the impact on the condition of the roadways of the very heavy trucks on the pavement, does not discuss the impact on the new Wilmington Waterfront Park currently under construction, the increase in accidents, and the like.

These are the impacts and omissions that indicate the “no project” alternative should be the preferred alternative. As a note, Ecocem points out that it was unable to secure a site in Long Beach or Port Hueneme, and we know from previous news reports that they were turned down in Vallejo as well. We strongly suggest that the comments in the following links, particularly those related to toxic chemicals in the GBFS product, be taken into consideration.

[https://web.archive.org/web/20220625160749/https://www.voicesofvallejo.com/not-so-harmless,](https://web.archive.org/web/20220625160749/https://www.voicesofvallejo.com/not-so-harmless)

<https://www.voicesofvallejo.com/fugitive-dust>

We do believe that a modification of Alternatives 2 and 3 might result in an environmentally acceptable project.

Alternative 2 is for a reduced product alternative and Alternative 3 is for a finished product import terminal.

Alternative 2 lowers the volume of the project, reducing the ship calls from 24 per year to 23 per year, but retains the on-site crushing and processing operation and still would distribute the finished product by truck. This does not materially reduce the air quality and truck transport impacts.

Alternative 3 is a product import terminal, where the slag would be processed before import, off-loaded and distributed it from the site. It does not really reduce much of the air quality impact and would have all the truck transport issues.

There is a combination/modification of Alternatives 2 and 3 that eliminates most if not all of the air quality impacts and truck transport impacts. That alternative would have the site used as an import terminal for the granulated blast furnace slag [GBFS] and transporting it out of the terminal area by rail car to a remote site where the GBFS could be processed and distributed as Ground Granulated Blast Furnace Slag [GGBFS].

Ecocem understands that raw product import and export via rail eliminates the truck transport and air quality issues, but says it is not feasible because it would require permits from others. Interestingly, they say that 20 rail cars per day would equal the 263 trucks per day that they hope to use.

Next door to the site is the Vopak terminal. Vopak has a rail line into the terminal as well as a fully enclosed and well-ventilated product storage barn, now unused but currently rented to Portland Cement Company.

Ecocem says that a rail line to its site would require extending the track that now runs through Vopak, would require road crossing agreements a double track would be needed to accommodate the 20 rail cars per day. This ignores the fact that the Port owns all the track in the Port, that the streets are not dedicated public streets, and the Pacific Harbor Lines is owned by the Port as well. The Port could easily construct an industrial sidetrack down Canal Street to the proposed terminal.

Under this proposed modification of Alternatives 2 and 3, the raw product would be imported through the site, loaded onto rail cars and transported to a more acceptable, non-waterfront grinding mill, then distributed throughout Southern California.

In summary, the Council believes that the no project alternative is the only reasonable and feasible option that meets the project objectives in the least environmentally impactful way and is the one that should be selected, as required by Cal. Code Regs. Title 14 Sec. 15126.6, Cal. PRC Secs. 21002, 21081. We also note that the project to manufacture GGBFS in the manner proposed by Ecocem requires use of waterfront property for a non-waterfront dependent use. The Port has traditionally rejected uses that are not waterfront dependent. Perhaps that is why this project was rejected by the Port of Long Beach, Vallejo and Port Hueneme.

We believe the Port should explore the rail transport option in greater depth. We propose, and are willing to participate in, a study group with Port staff and PHL staff to explore this option. Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Dillon Clark".

Dillon Clark, President  
On behalf of the Central San Pedro Neighborhood Council  
(Passed by the CeSPNC Board on December 11, 2023)  
cc: Board of Harbor Commissioners  
Council 15 Office