

Public Hearing Comments- February 24, 2010

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3	GERALD DESMOND BRIDGE
4	REPLACEMENT PROJECT
5	PUBLIC HEARING
6	PORT OF LONG BEACH
7	CALIFORNIA DEPARTMENT OF TRANSPORTATION
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11	REPORTER'S TRANSCRIPT OF PROCEEDINGS
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16	City Council Chambers
17	Long Beach City Hall
18	333 West Ocean Boulevard
19	Long Beach, California
20	Wednesday, February 24, 2010
21	6:30 P.M. - 7:35 P.M.
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23	Reported By:
24	Natalie Rodriguez, CSR No. 12851
25	JOB NO. 118621

1 LONG BEACH, CALIFORNIA, WEDNESDAY, FEBRUARY 24, 2010

2 PROCEEDINGS

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4 MR. CAMERON: Good evening everybody. We're
5 going to go ahead and get started. Just a couple --
6 first of all, thank you for being here tonight. My name
7 is Rick Cameron. I'm the director of Environmental
8 Planning for the Port of Long Beach. Tonight we're here
9 to have the public hearing -- this is the second public
10 hearing for the Gerald Desmond Bridge Replacement
11 Project. I want to go over a little bit of housekeeping
12 before we start.

13 One, I'm going to give a presentation and
14 lights -- we're going to kind of see how the lights are
15 with the screen. So we may play around with the lights
16 as I get going. So bear with us on that. If you have
17 any cell phones, please put them on vibrate or turn them
18 off. I'll appreciate that. We do have a court reporter
19 who's taking transcripts of this proceeding this evening.
20 So when you come up to the podium to make your comments,
21 if you could speak clearly and not too fast, so she can
22 pick up on that. I'll appreciate that.

23 I have to check myself on that. We also have a
24 sign language interpreter if there's anybody in the
25 audience who needs any assistance. We also have a

1 Spanish translation here this evening if anybody needs
2 some assistance as well. So one last thing is I would
3 appreciate -- this is a public hearing. We will be
4 taking public comments after my presentation and I would
5 ask that everybody be respectful of all the comments and
6 if you can keep any type of reaction at a minimum. Be
7 respectful. I would appreciate that.

8 With that tonight we're holding this public
9 hearing to solicit input on the proposed Gerald Desmond
10 Bridge Replacement Project. The Port of Long Beach in
11 cooperation with the California Department of
12 Transportation, Cal Trans, has produced an Environmental
13 Impact Report/Environmental Assessment for the proposed
14 project. The Port is the state lead under the California
15 Environmental Quality Act and Cal Trans is the federal
16 lead under the National Environmental Policy Act.

17 The purpose of tonight's meeting is to present
18 the proposed project and its alternatives, describe the
19 impacts associated with the proposed project, and
20 measures to mitigate those impacts. We'll also be
21 evaluating four alternatives, which are included in the
22 revised draft document. This is the second of several
23 opportunities for you to provide any comments you may
24 have on the proposed project. This is the second public
25 hearing we've had. We had the first public hearing last

1 Wednesday at city hall. And the comment period for this
2 will end on March 22.

3 That's the conclusion of the 45 day public
4 review period. A draft EIR/EA for the proposed project
5 was circulated in June 2004, after which time the Port's
6 environmental documents were put on hold pending
7 development of its environmental protocols. The 2004
8 EIR/EA considered three alternatives: The North-Side
9 Alignment, which is the preferred proposed project; the
10 South-Side Alignment, and No Project. The 2010 revised
11 draft EIR/EA includes an additional alternative, the
12 rehabilitation of the existing bridge.

13 So this is the fourth alternative. Because the
14 length of time that had passed the traffic analysis and
15 air quality and several other special technical studies
16 were updated to support the analysis that's presented in
17 the revised draft EIR. The overall need for the project.
18 As with all bridges of that area and high seismic regions
19 when the bridge was built, its original construction has
20 performed to -- that do not meet current seismic
21 standards required by the American Association of State
22 Highways and Transportation officials and Cal Trans
23 seismic criteria.

24 There are also other needs and deficiencies such
25 as traffic capacity and overall roadway capacity as well

1 as the overall height of the bridge from a vessel
2 navigation standpoint. The Port has three objectives in
3 proposing the project. A, provide a structurally
4 seismically sound bridge. Second, improve roadway
5 capacity and safety so that the bridge can handle the
6 predicted growth and regional traffic. And lastly,
7 increase the height of the bridge to allow the next
8 generation of larger, greener, and more efficient ships
9 to access the terminals that are north of the bridge.

10 I'm going to be going over the four alternatives
11 that are within the document. The four alternatives that
12 are considered I've described; the North-Side Alignment,
13 South-Side Alignment, Bridge Rehab, and the CEQA No
14 Project or No Action. The North-Side Alignment
15 Alternative would provide a new bridge located
16 approximately 140 feet north of the existing bridge. The
17 new bridge would be a cable-stayed design, 200 feet above
18 the Back Channel, and have a five percent grade with
19 three lanes, plus shoulders, in each direction.

20 The project would also include reconstruction of
21 the existing horseshoe ramp interchange on Pier T, which
22 is on the Terminal Island side, and the reconstruction of
23 the connectors to the I-710 and Pico Avenue. The
24 South-Side Alignment Alternative would include the same
25 basic elements as I've just described and would be

1 approximately 177 feet south of the existing bridge.
2 Following construction of the new bridge on either the
3 North- or South-Side Alignments, the existing bridge
4 would be demolished.

5 During construction of either one of those new
6 bridge alternatives, the existing bridge would be in
7 operation. There would be -- this is analyzed in the
8 environmental document as part of the construction phase
9 and would also have traffic control plans in place to
10 deal with the overall connections after the new bridge is
11 ready to be connected to the island and to the I-710.
12 The Rehabilitation and the No Project. With the Bridge
13 Rehabilitation Alternative the existing bridge would be
14 rehabilitated to improve its seismic performance and
15 extend its life span.

16 No new lanes would be added and the height of
17 the bridge would remain at 156 feet. Rehabilitation
18 would include replacement of the bridge deck, expansion
19 joints, and sway bracings, painting of all the members,
20 seismic retro of the foundations, columns, bent caps,
21 abutments, and superstructure. The overall
22 rehabilitation life would extend the existing bridge by
23 approximately 20 years, after which time the bridge would
24 have to be reevaluated for replacement and/or more retro.
25 The No Project Alternative, as the name implies, would

1 not result in any changes.

2 The approach ramps and the interconnections,
3 everything would stay in place. It would just be as is
4 now, how it's currently operated today with the ongoing
5 maintenance activity. Replacement concepts. The bridge
6 replacement parameters included different types of
7 bridges. When we went through an evaluation with Cal
8 Trans, there were different concepts of the types of
9 bridges that could be evaluated. Bridge roadway
10 geometry, height and span, dimension of major structural
11 members, location, aesthetics, cost, constructability,
12 seismic performance, right-of-way issues, schedule,
13 impact to Port operations, and maintenance.

14 Based on all of these parameters a single mast
15 tower, cable-stayed bridge design was chosen to move
16 forward with. I will now highlight some of the impacts
17 associated with the project and -- which is the preferred
18 project either the North Alignment and South Alignment
19 have very similar overall impacts that we've analyzed as
20 well as some of the mitigation measures. The
21 Rehabilitation Alternative had less impacts associated
22 with it by virtue of the construction as well as some of
23 the operation. And the No Project has ongoing operation
24 evaluated.

25 There would be impacts to intersections during

1 construction including the Pier B Street, 9th Street,
2 Pico Avenue intersection and the Pico Avenue, Pier D
3 Street intersection. That's a lot to take in one
4 sentence there. The impacts associated with construction
5 would be temporary but mitigation measures such as
6 widening, re-striping, and installation of a traffic
7 signal would help lessen these impacts. Those are all
8 described in the revised draft document in the traffic
9 section described in those mitigation measures.

10 By 2015, traffic volumes would be such that
11 there would be a significant adverse impact during
12 operations at the Navy Way, Seaside Avenue intersection.
13 There is no mitigation within the Port's control that
14 could be implemented. However, the Port of Los Angeles
15 is proposing improvements that would reduce the impact to
16 insignificant. Until that time, the impact would remain
17 significant. There was proposed mitigation measures for
18 the Port of Los Angeles projects that I'm referring to
19 there.

20 There would be air quality impacts during
21 construction. The Port would use mitigation measures
22 similar to those that were adopted in the Middle Harbor
23 Projects for construction in terms of clean equipment to
24 be used during the construction project as well as those
25 measures prescribed by the South Coast Air Quality

1 Management District, such as dust suppression. Kind of
2 the standard mitigation measures that a lot of
3 construction projects utilize. There would also be
4 significant cumulative air impacts during operation of
5 the bridge.

6 From a biological standpoint for wildlife, we
7 have Peregrine falcons occasionally use the existing
8 bridge for nesting. They also use the Heim Bridge, which
9 is located just west on Terminal Island. They utilize
10 Koch Carbon, which is one of our terminal operators on
11 Pier F. They have silos and they utilize the height on
12 those silos as well as city hall. We have nesting at
13 city hall on the top of the building.

14 The Port is working with California Fish and
15 Game to establish a monitoring program, which is
16 contained within the document, which lays out no work
17 zones and the placement of nesting platforms on the new
18 bridge. So there's actually going to be a transition.
19 Once the new bridge project is approved in one of the
20 alignments they would be new nesting that would be
21 provided and there would be kind of a transition to try
22 to get the birds over there. Since the old bridge will
23 not be demolished until the new one is finished there's
24 going to be a lot of time to get these nesting in place.

25 The current bridge also has bats. Bats are also

1 protected and we have a full evaluation in the
2 environmental analysis and we've also established
3 mitigation measures that would provide a transition from
4 the old bridge to the new one for the bats. Another
5 issue of concern that we've analyzed or have laid out is
6 encountering historic hazardous materials and hazardous
7 waste. In the past, hazardous materials and waste
8 handling and disposal from formal Port operations in the
9 project area that -- have dealt with as well and we're
10 going to be working with the responsive regulatory
11 agencies for any of those cleanup plans as necessary.

12 In summary, the existing bridge is nearing the
13 end of its useful life. There have been many studies
14 contained within the environmental document whether in
15 the executive summary or in Chapter one which highlights
16 a lot of the studies that have been performed that
17 highlight the deficiencies of the bridge. It was built
18 in 1968 and the standards for these bridges have evolved.
19 The new bridge would have a hundred year life span and
20 would be structurally sound, seismically resistant, and
21 it almost certainly would become a signature for the City
22 of Long Beach.

23 The grades on the existing bridge make it
24 difficult for trucks to make the climb resulting in much
25 slower speeds on the bridge. This in and of itself

1 creates traffic as well as air quality impacts. The
2 projected future car and truck volumes could overwhelm
3 the capacity of the existing bridge. The existing bridge
4 which currently has three climbing lanes and two
5 descending lanes on each side and while the additional
6 climbing lanes help flow traffic, it's only a Band-Aid at
7 best in terms of keeping the circulation going.

8 The shoulders that are being proposed on two of
9 the alternatives would help maintain traffic flow on the
10 bridge, since breakdowns and accidents could be moved to
11 the side out of traffic lanes, helping maintain flow.
12 The current bridge doesn't have that. If any of you have
13 been stuck on the bridge, you know what it's like. One
14 lane gets held up and there you go. Another important
15 factoid that's contained in the document is that 75
16 percent of the traffic volume is commuter traffic.

17 I go over that bridge twice a day. 15
18 percent -- actually, 25 percent is actually truck traffic
19 or heavy truck traffic either from the Port or other
20 operations. From both ports not just the Port of Long
21 Beach. Raising the bridge would help accommodate the new
22 generation of ships. This is the third objective for
23 this project -- which currently are being built or
24 already in service in many of the terminals south of the
25 bridge. The new bridge height would help the newer,

1 larger ships transit the Back Channel safely as well. As
2 a bonus new ships have cleaner engines.

3 If there are any questions -- if there's any
4 questions, here's the contacts. Stacey Crouch, who's not
5 here this evening, but she's the project manager. She
6 works as part of my staff for the environmental document.
7 This is her contact information. My contact information
8 has also been provided, my e-mail address where you can
9 get a hold of me. Cal Trans, our partner, Karl Price, is
10 in the room and he's in the back and he's the project
11 lead with Ron Kazinski as well. Ron is here.

12 Karl can be reached -- this is his e-mail
13 address and phone number as well if there's any questions
14 of Cal Trans. Overall the next steps; after the close of
15 the comment period on March 22, the Port and Cal Trans
16 will be preparing the final EIR/EA. The preparation of
17 the final EIR/EA is to review all comments that are
18 received. That we receive during the comment period.
19 Including the comments that you'll be providing tonight
20 here in the public comment period.

21 We go through those comments. We're obligated
22 to respond to every comment, and we will go through and
23 respond to the comments, make those changes to the
24 environmental document to the final that are a result of
25 those comments, and then we will -- basically, put the

1 final touches on the environmental document. Following
2 that completion, the environmental document is released,
3 report our responsive comments to those who commented,
4 and we submit the final environmental -- EIR/EA for the
5 10 days prior to the Board of Harbor Commissioners
6 considering the certification and adoption of the
7 environmental document approval of either one of the
8 alternatives.

9 Following the preparation of the final, it will
10 be distributed to all those who commented. After our
11 Board of Harbor Commissioners weighed in on the project,
12 Cal Trans' also has -- the next step would be to prepare
13 a finding of no significant impact and approve or
14 disprove the project. They have to go through their
15 final consideration as well. At this point in time just
16 like we did with Middle Harbor we have a request for
17 extending the comment period. We will consider those.

18 We'll be in consideration for our Board of
19 Harbor Commissioners and Cal Trans for an extension. So
20 there may be an extension. If there is an extension of
21 the comment period, we will put out the public notice and
22 let everybody know of that extension. With that just
23 once again submitting the comments, you can submit to my
24 attention at this address. You can find all of the
25 documents, the technical studies on the Port of Long

1 Beach Web site. It's under polb.com under the
2 environmental documentation tab. It's the first big
3 laundry list of documents.

4 If you'd like a hard copy or a CD, you can
5 contact my staff or myself and we'll make sure you get
6 that. We did not distribute hard copies of the
7 environmental document. We're trying to be as green as
8 possible, be sustainable, but if there's anybody in need
9 of a hard copy, we'll be happy to provide that. With
10 that I'm going to close my presentation and open it up
11 for public comment. Last week I butchered a couple of
12 names, so bear with me. Please correct me and I'll do my
13 best. The first speaker will be Tim Lee and the second
14 speaker after Tim will be Brian Mineshino.

15 PUBLIC SPEAKER: You didn't butcher my name.
16 Tim Lee. I'm Deputy District of Record for Congresswoman
17 Laura Richardson. And I actually have a statement to
18 read from the Congresswoman. I want to express my
19 appreciation and support for the continued focus of the
20 community and its focus on the Gerald Desmond Bridge. As
21 we all know the Gerald Desmond Bridge is a central part
22 of the Port's operations and thus a central part of our
23 national infrastructure.

24 Interstate 710 and the Gerald Desmond Bridge
25 carry approximately 15 percent and 10 percent of all US



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1 waterborne container volume respectively. While the
2 recently opened Alameda Corridor can be thought of as a
3 trade railway gateway to the nation, the 710 Gerald
4 Desmond Bridge gateway is the de facto trade highway to
5 the nation. However, the Gerald Desmond Bridge is
6 presently experiencing serious performance problems due
7 to a number of interrelated reasons including traffic,
8 congestion, and safety. As you all know the bridge
9 contains a diaper to catch falling debris which is a
10 telling sign that it's time for a new bridge.

11 I recently met with Long Beach Port officials
12 and Transportation Infrastructure Committee Chairman
13 Oberstar in Washington DC to talk about this bridge.
14 Chairman Oberstar already knew about the importance of
15 this bridge, but explaining to him and letting him know
16 that this bridge is sufficiently worse than the one that
17 recently collapsed in his home state of Minnesota helped
18 to reinforce how urgent our situation is. The bridge
19 currently has a level of service rating of F during peak
20 periods. And while the current situation is serious if
21 we do not act now, things are only going to get worse.

22 While we currently see congestion on the bridge
23 these poor existing traffic conditions will be further
24 exacerbated due to the forecast's robust growth and
25 international trade and growth here in the region.

1 Standing path is not an option and the time to act is now
2 while the port is experiencing a temporary reduction in
3 traffic due to the economy and thus can better cope with
4 a large scale construction project. I've been working
5 hard in Washington to get every dime I can to help fund
6 this project.

7 I know that we need to start construction as
8 soon as possible. It's a sad fact with large scale
9 construction projects that necessary funding can be a
10 moving target as time goes on and construction costs
11 escalate. It's disheartening to know that project costs
12 have already doubled over the past five years and we have
13 worked to raise money, but this fact only strengthens my
14 resolve to find funding as soon as possible. The bridge
15 has already received funding from several federal
16 government sources.

17 They include one hundred million dollars in the
18 2005 Surface Transportation Organization Bill and almost
19 six million dollars in annual earmark. I'm looking
20 forward to the reauthorization of the surface
21 transportation project that congress is currently
22 considering to find the remaining funds for the bridge.
23 For the current reauthorization requested 375 million
24 dollars to the Gerald Desmond Bridge back in May, which
25 would go a long way towards fully funding the project.

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1 Beyond the specific dollar requests I am excited that
2 there seems to be congressional resolve for this
3 reauthorization bill to include both programs and a large
4 amount of money to be awarded through the competitive
5 process.

6 I am very confident that the merits of this
7 project will be understood in Washington and the
8 Department of Transportation and large sums of money
9 would be awarded to this project and other important
10 goods movements projects in this area due to projects of
11 national significance and freight improvement programs.
12 To leave as little as possible to chance I have already
13 worked with the committee to change no less than 80
14 different sections of their draft reauthorization bill,
15 so that when these competitive programs are established,
16 the particular needs of this area and this particular
17 bridge will be fully considered.

18 To ensure that officials who work to make
19 funding decisions fully understand the needs of this area
20 and the acute importance of this particular bridge, over
21 the past year I have brought dozen of federal officials
22 to come visit the bridge to better understand what a key
23 component it is for our nation's goods movement
24 infrastructure. These visitors have included Deputy
25 Transportation Secretary Ricarie, Acting Administrator

1 Masuta, Chairman of the Federal Maritime Commission
2 Richard Densky, and more than a dozen of my fellow
3 members of congress.
4 I also know that we must be careful in planning
5 the bridge to ensure that the communities near the port
6 and along the 710 freeway are not negatively impacted by
7 increased freight traffic that will likely come with this
8 expansion. I work hard in congress to help the ports
9 expand their business because they are such an important
10 economic drive for our area, but at the same time I work
11 to ensure that every time the port expands efforts are
12 made to mitigate environmental impacts of this expansion
13 and to ensure that the quality of life and the health of
14 those in the area do not suffer. I want to thank all of
15 you again for coming out to discuss this project and I
16 express my regrets that I am not able to be here in
17 person with you today to give these remarks, but
18 unfortunately my schedule and voting obligations do not
19 allow me to be here.
20 Please feel free to reach out to me or any of my
21 staff to ask questions or if you have any requests that
22 we may be able to help with. Thank you, Congresswoman
23 Laura Richardson.
24 MR. CAMERON: Thank you. Brian.
25 PUBLIC SPEAKER: My name is Brian Mineshino.

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1 I'd like to read a statement on behalf of Assemblyman
2 Warren Furutani. On behalf of Assemblyman Furutani I'd
3 like to express our strong support for the Gerald Desmond
4 Bridge Replacement Project. We'll be submitting a more
5 detailed letter within the coming days outlining the
6 reasons for our support. In short, the project is long
7 overdue. As our economy begins its road to recovery it's
8 important to ensure that our products leaving to and from
9 the ports are safe and efficient.

10 This project does both. Additionally, this
11 project is a much needed boost for the local economy with
12 the prospect of new jobs being created through the
13 construction -- activity -- it's with great pride that
14 labor and business in support of the project. Thank you.

15 MR. CAMERON: Thank you. I know -- if you
16 could just kind of keep the -- at a low level, I'd
17 appreciate it. The next two speakers: Bartlett Patton
18 and the next speaker will be Anthony Wayne Ford.

19 PUBLIC SPEAKER: Good evening. My name is
20 Bartlett Patton. I am part owner in a business that
21 operates an office and laboratory in Long Beach -- in the
22 City of Long Beach and our people are affected daily by
23 the traffic delays that are currently experienced on the
24 bridge. I'm aware that the bridge is not sufficient to
25 at least handle today's traffic and the traffic

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1 projections for the future. I'm also aware that the
2 bridge is deteriorating and I'm concerned about the
3 delays that the community will experience -- definitely
4 will experience if those -- if that deterioration
5 continues and, you know, we have to make repairs.

6 I'm also aware that the bridge is seismically
7 deficient and I'm very concerned about the disruption
8 that would occur and the economic impacts that would
9 occur should the bridge be severely damaged and have to
10 be repaired. I have reviewed the mitigation measures
11 that were proposed in the documents, and I'm impressed by
12 the efforts that have been made, and on behalf of our
13 employees in Long Beach and myself, I am strongly in
14 support of the project. Thank you.

15 MR. CAMERON: Thank you.

16 PUBLIC SPEAKER: Good afternoon. My name is
17 Anthony Wayne Ford. I'm from Local Union 95 as you can
18 see from my hat. I represent all unions because we're
19 all brothers number one. You said the construction alone
20 would support an average of 4,000 jobs a year for five
21 years. So my question is who will be filling these 4,000
22 jobs? California union workers or outside state of
23 California workers? And can you make a promise here that
24 these jobs will go to local union workers instead of
25 non-union workers and will union workers be maintaining

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1 the upkeep on this property so it won't deteriorate the
2 next 40 years? Thank you.

3 MR. CAMERON: Thank you. The next two speakers
4 John Schafer and Kevin Bass.

5 PUBLIC SPEAKER: Good evening. Local pile
6 drivers bridge dock local 2375 (inaudible.) I guess the
7 basic thing that I want to try to get across is why there
8 are so many people here. What's happened several times
9 in the past EIRs, particularly, large infrastructure
10 projects is that they get proposed, the congress people
11 get the money to go do it, and they just linger in the
12 environmental due process and never actually occur. What
13 happens is many times our electives hire consultants and
14 reviewers and so forth.

15 They'll spend the initial 10, 20, 30, 40, 50
16 million dollars to study it after they've gotten all the
17 support from the building trades and other workers to try
18 to build it, but really in reality they don't have any
19 intention of actually building it. What they do is they
20 have the money to consult and look and everything else to
21 get it done, but I think representing 900 workers who
22 live primarily within the local area, what we're
23 concerned in is the work that's involved. We take pride
24 in our work. We try to build it right. There is a need.

25 If you look at any economic depression,

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1 infrastructure projects generate economy. They build
2 jobs locally and get things going. And to continue to
3 propose and then discuss and look over and think about it
4 and then ultimately not build it because the electives
5 now have gone into other posts and isn't concerned about
6 it anymore is an insult to the community and particularly
7 workers who are counting on that job to feed their
8 families and to be able to work close to home.

9 So if you're going to be serious about building
10 this project, then continue. But if this is an attempt
11 to get money from the federal government to try to bring
12 it home on other things that try to deal with and never
13 actually build this project, don't waste our time. We
14 want this project to go forward because it has real
15 impact and is necessary. This bridge is getting old. It
16 needs to be built.

17 And I hope that you take it seriously and build
18 it the best you can because that's what we will do once
19 that project gets started. Thank you for your time.

20 PUBLIC SPEAKER: Good evening. My name is
21 Kevin Bass. I'm with the Painters and Allied Trades
22 District Council 36. We represent 11,000 workers
23 basically from Bakersfield to the border in four
24 different trades and about 15 different unions. I work
25 in the governmental affairs department. And I'm here to

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1 support this project, but more importantly not just this
 2 project because it's obvious something needs to be done
 3 with this bridge.
 4 As the lady said last week, if it has diapers,
 5 it's obvious that something needs to be changed. What
 6 I'm really here to speak about is how this needs to occur
 7 and it needs to happen with a project labor agreement
 8 ensuring local hire and union labor. All of these people
 9 here -- you guys can stand. These are all craftsmen from
 10 some of our various trades. I have probably about 500
 11 people in this area alone that could find work in this
 12 project and not only my union, as the brother said
 13 earlier, it's all the other unions.
 14 We're all brothers together. We work closely
 15 together. We're all trying to do the same thing. It's
 16 to get these people working, stimulate the economy. The
 17 more money they make, the more money they spend, other
 18 businesses thrive. And we just want your assurance that
 19 it's going to be done that way and, again, not bring in
 20 out of state labor which I don't know because everybody
 21 doesn't speak of it but that money doesn't even
 22 contribute to our taxes. So it really behooves everyone
 23 for this to be a union project under a project labor
 24 agreement. Thank you.
 25 MR. CAMERON: The next two speakers: Jesse

1 Marquez and Mark Mendonga.

2 PUBLIC SPEAKER: My name is Jesse Marquez. I'm

3 here to speak both as an individual resident from the

4 Harbor Community; I'm also executive director of the

5 Coalition for a Safe Environment. I've not had time yet

6 to review the whole environmental impact report, but I do

7 have some concerns that I do wish to share with you. We

8 do support building a new bridge but without any truck

9 capacity. We do support the bridge rehabilitation

10 alternative that is included in the EIR.

11 We do not support building a new bridge that

12 would increase truck traffic capacity and support future

13 capacity like the addition of additional truck lanes. We

14 do support building additional terminals that have on

15 dock rail capacity in order to decrease bridge usage. We

16 do support increase in the Alameda Corridor usage in

17 order to decrease bridge usage. We support the Port's

18 adoption -- adopt and incorporate the use of electric

19 train rail -- (inaudible.) Linear train alternative zero

20 polluting cargo transportation systems, which, if you

21 disclose the truth, they can actually triple the speed

22 and increase the impact capacity and triple the capacity

23 of the delivery of containers and cargo.

24 We request that the Port include feasibility

25 information of these alternative technologies in the

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JMa-3

1 environmental impact report. That you contact the
2 companies so they can validate their feasibility for
3 these applications that I have mentioned. We request
4 that a health impact assessment be included in the final
5 EIR. I request that the Port disclose significant
6 benefits and additional public health impact information
7 contained in a health impact assessment that is not
8 contained in a health risk assessment.

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9 And the last point is we request that the EIR
10 include information assessments of the benefits of
11 allowing only electric trucks and hydrogen fuel cell
12 trucks to use the bridge for local deliveries and
13 prohibit diesel fuel trucks, which pose risk in public
14 health and environmental global warming and biological
15 impacts. And we will be submitting more extensive
16 documentation in written comment form. Thank you.

17 MR. CAMERON: Thank you.

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18 PUBLIC SPEAKER: Mark Mendonga. I'm a local
19 resident of Long Beach, also a proud member of Local
20 Union No. 12, International Union of Operating Engineers.
21 I'd like to encourage this project go forward as new
22 construction of the bridge. Long Beach has, as well as
23 LA Harbor, vastly increased their capacity. The bridge
24 is, as has already been stated, just past its capacity,
25 past its life span. It's time to go ahead and upgrade

1	our infrastructure.	} MMe
2	The great nations of the world will always	
3	upgrade their infrastructure whether it be the	
4	information pipeline or the product pipeline, getting	
5	trucks here to there with goods and services that are	
6	needed. If we don't do this, we're going to start	
7	falling behind and we need to take a leadership role on	
8	that. The whole country is looking to California in many	
9	instances to see what's being done and infrastructure, I	
10	think, we need to take a lead in and not shy away from.	
11	Thank you very much for your time.	
12	MR. CAMERON: Thank you. The next two	}
13	speakers: Joel Thurwachter and Clay Sandidge.	
14	PUBLIC SPEAKER: Good evening. My name is Joel	} IOE12
15	Thurwachter. I'm a business representative for the	
16	International Operating Engineers Local 12. Local 12 is	
17	in support of the Gerald Desmond Bridge Replacement	
18	Project and would also like to see a project labor	
19	agreement that ensures local hire. Thank you.	
20	PUBLIC SPEAKER: Good evening. My name is Clay	} FP(B)
21	Sandidge. I'm here representing Future Ports. I am the	
22	current president of Future Ports, which is a local	
23	community based organization that represents hundreds of	
24	employees in and around the ports of LA and Long Beach.	
25	We are here to support this EIR and concept. We are	

FP(B)

1 still going through the EIR with our committee -- our
2 review committee.
3 That is a very extensive document and we are not
4 through it to date, but we will be presenting our final
5 written comments by the deadlines. But I wanted to
6 ensure that Future Ports membership is behind this
7 project. We'd like to see it go forward. Some of the
8 highlights, obviously, are the jobs, supply chain
9 movement, goods movement in a safe environment, commuter
10 safety. I travel across that bridge at least three or
11 four times a week and it's certainly a concern of mine.
12 Traffic flow and environment stewardship is obviously a
13 very key concern.
14 So we know the Port does its part on the
15 environmental stewardship program. We greatly applaud
16 your efforts and we'd like to see this project move
17 forward. Thank you very much.
18 MR. CAMERON: Thank you. Our next two
19 speakers: Simi McMoore and Tommy not Tammy Faavae.
20 PUBLIC SPEAKER: Good evening. My name is Simi
21 McMoore. I'm a current resident of Long Beach. 180 East
22 Morgan Street. I'm currently a summer helper with IBEW
23 Local 11. I'm here today basically to move this project
24 forward, you know. I think it would give a lot of
25 opportunity to a lot of people in the city and it will,

SM

1 you know, help us get into the apprenticeship program.
2 And we're here to just move this project forward. Thank
3 you.

4 PUBLIC SPEAKER: Good evening. Tommy Faavae.
5 I represent the International Brotherhood of Electrical
6 Workers Local 11 in the Los Angeles area. I'm a
7 stakeholder in Long Beach. I live in the City of Carson
8 though but my area covers the whole South Bay and Harbor
9 area. I just would like to say that this project means a
10 lot to our community. It means that -- it gives
11 opportunity for our young men and women to come into the
12 trades, especially our electrical apprenticeship program,
13 which gives them a leg up to go through apprenticeship
14 program and reek the really good benefits and wages so
15 they can support their families and move forward.

16 And that's all these gentlemen and women want to
17 do. They want to be role models to pursue those careers
18 and hopefully have their nephews and nieces and kids to
19 come up into the trades also. I know this bridge has
20 been -- has been around for a long time. You know, I
21 traveled that bridge back and forth and, you know, put a
22 lot of mileage on that bridge. But what it means is that
23 when we can build this bridge, it means -- it means
24 history to all these young men and women.

25 And lastly, I would like to say that with the

IBEW11

IBEW11

1 federal funding that's coming from the federal government
2 there needs to be a federal project labor agreement under
3 this project because there is a federal PLA. When
4 President Obama came into office, the second month when
5 he was in office, he lifted the restrictions on a federal
6 PLA, so he can make sure that federal PLA are practiced
7 all over the state -- all over the country. So there is
8 language in place to have a project labor agreement. We
9 just need to push this forward. We need to create real
10 good construction jobs and that's all we look forward to.
11 Thank you.

12 MR. CAMERON: Thank you. The next two
13 speakers: Tyrone Taaga and Davis Teofilo.

14 PUBLIC SPEAKER: Tyrone Taaga residing in Long
15 Beach area over 20 years with the IBEW Local 11, summer
16 helper program. I'm trying to get into the
17 apprenticeship program. My father was a hardworking man.
18 He was in the union over 20 years and he provided for a
19 family of nine and I have family of my own as well now
20 and I'm trying to do the same thing as my father did when
21 he was in the union. Pushing this project forward would
22 also give us an opportunity to get into the
23 apprenticeship program.

24 It would help our families immensely. I also
25 have brothers that are working down in the ports, a lot

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1 of relatives that I grew up with. They're always using
2 that bridge daily, the Desmond Bridge. It would also be
3 safe if we push this project forward. I would appreciate
4 it a lot and thank you very much.

5 PUBLIC SPEAKER: My name is Davis Teofilo. I
6 reside here in the City of Long Beach. I'm also a summer
7 helpers for the IBEW Local 11. We're here today to push
8 forward on this project. We also want to be a part of
9 the history with this bridge. A lot of us want to jump
10 into this apprenticeship program. The PLA put forth in
11 this program -- project will give a lot of opportunity
12 for a lot of local people who live here in Long Beach,
13 put them to work for, you know, to better their families
14 and put food on the table. That's especially why we're
15 here. So push forward on this project and have PLA on
16 the project. Thank you.

17 MR. CAMERON: The next two speakers: Elizabeth
18 Warren and Ken Fredrickson.

19 PUBLIC SPEAKER: Good evening. My name is
20 Elizabeth Warren. I'm the executive director of Future
21 Ports and also Harbor area resident. I would thank you
22 for the opportunity to speak this evening and we applaud
23 the Port's staff for producing this document. We're
24 eager to move forward with the final EIR. On behalf of
25 Future Ports and its members we are pleased to provide

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1 some comments, however, as Clay mentioned earlier due to
2 the short time period between the issuance of the
3 document and the appearance, we've not had a chance to
4 adequately review the draft document and will submit
5 formal comments before March 22.

6 So as Clay mentioned we do agree in concept with
7 the goals cited by the Port in the FAQs for this
8 document. However, it is not only important to our
9 region to replace this bridge, it's urgent that we move
10 forward and replace it as soon as possible for many
11 reasons. Number one, it's structurally deficient. This
12 bridge is literally falling apart before us and it graded
13 as poor by Cal Trans inspectors. It has tons of concrete
14 falling off of it. We need to keep our port competitive.

15 The Port of Long Beach is the busiest seaport in
16 the United States and this bridge has the lowest vertical
17 clearance in the nation. At a time when shippers are
18 looking for reasons to abandon Southern California ports,
19 we need to do everything we can to keep our goods
20 movement industry here in Southern California, keep the
21 cargo and the hundreds of thousands of jobs supported by
22 that cargo here and not in Canada, Mexico, or Panama
23 Canal. Number three, greening our ports. Replacing this
24 bridge will allow cleaner, greener ships to access the
25 inner harbor where they can plug in to electric shore

1 power.

2 Modernizing the port and greening the port go
3 hand in hand. This project is another example of how the
4 Port of Long Beach can modernize and go green at the same
5 time. Number four, safety. Lack of safety of emergency
6 lanes is a huge problem. Many of us has been stuck on
7 the bridge when there's been a breakdown or accident that
8 can cause traffic problems, it can delay emergency
9 responders and divert traffic to residential
10 neighborhoods.

11 And the last point, jobs, jobs, and jobs. This
12 project will create 2.8 billion in economic activity
13 resulting in thousands of permanent jobs in the goods
14 movement industry. The construction of this project will
15 create 4,000 jobs a year for five years. The goods
16 movement industry and construction industry both provide
17 good jobs that provide benefits such as health insurance,
18 paid vacations. The San Pedro Port complex is critical
19 to a successful economy in Southern California. When the
20 Port of Long Beach is doing well, the City of Long Beach
21 benefits from increased revenues generated by that
22 economic activity.

23 The residents of Long Beach benefit because they
24 have access to the good jobs generated by the port or the
25 benefit of those good jobs generated by the economic

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1 stimulus provided by the port. It's a win win for all of
2 us. This project is a key component and is critical to
3 the future development of the Port of Long Beach. We
4 must move forward with this project and expedite the
5 final EIR. Thank you.

KF(B)

6 PUBLIC SPEAKER: I'm Ken Fredrickson. I'm a
7 San Pedro resident who uses the Terminal Island cross
8 through and the bridge routinely. One of the things
9 we've seen in the past is that as we improve the roads
10 through Terminal Island traffic flow has greatly
11 improved. We no longer see trucks lined up for miles.
12 We no longer see trucks idling. The Port has done a
13 great job to improve the process we have to get cargo in
14 and out of the ports.

15 We need to look at the bridge as the next step
16 of doing that. The ports are going to continue to grow.
17 The fact is it's an economic benefit for us. We're
18 coming back out of a recession. We're going to start to
19 see traffic in the ports again. We need to make sure
20 that the infrastructure continues to improve along with
21 the way the ports are going to grow. We need to look at
22 these kinds of projects as positive developments for the
23 environment.

24 The port is going to grow and we need to move
25 the infrastructure along with that, so that in fact we

1 still have the smooth moving traffic that we see right
2 now. Thank you.

3 MR. CAMERON: The next two speakers: John
4 Sommers and then John Taleifi. I apologize.

5 PUBLIC SPEAKER: Good evening. My name is John
6 Sommers. I'm a local businessman and architect in Long
7 Beach, former president of the American Institute of
8 Architects in Long Beach and a leading certified
9 architect. I'm kind of ambivalent about the project. I
10 feel at this point I have not read the EIR. All I've
11 read is the various newspaper accounts and seen some of
12 the renderings, things like that, and I have a lot of
13 questions going on for what's going on.

14 One of the big points that has been raised is
15 the creation of 4,000 jobs and I'm really quite amazed to
16 see the turn out of local labor unions here to lobby for
17 their portion of the work that's going to be handed out,
18 but I have to tell the unions that in a way we've been
19 kind of already sold out by the creators of this project
20 because from my point of view as an architect and an
21 engineer, the Port has hired an architect and engineer
22 that is not local to Long Beach.

23 And while the labor unions here tonight
24 represent a lot of sweat equity and hard work in the
25 process the actual mind work of the process by the

} KF(B)

} JSo-1

JSo-1

1 architects and engineers is not being done in Long Beach.
2 Mayor Foster has a great program going at Jordan High
3 School, the Ace Program, training young architects and
4 engineers and if they could apprentice to the firm that
5 is actually designing the project, they would get a
6 wonderful opportunity. So this is something I'd like to
7 see; is more of the mind equity in the project coming
8 locally. Another issue I have has to do with the overall
9 planning process that's going on.

JSo-2

10 Besides this very large capital improvement
11 there are several other large capital improvements that
12 are planned or ongoing in the port. There's a new rail
13 yard that's proposed only a few hundred yards from where
14 we are tonight. A big multimillion dollar rail yard. Of
15 course the new extension of the Mid Harbor dock is one of
16 many hundreds of millions of dollars. There's been
17 proposals to upgrade the lift bridge that is part of the
18 Terminal Island Freeway. And all these things are
19 contingent on the traffic and situations that take place
20 in the harbor.

21 I'm not sure if the EIR really addresses the
22 impacts of these various other big capital projects.
23 Just some of the common sense things that I've seen, and
24 again it's only from newspaper articles, I can understand
25 the need to upgrade to a six lane bridge, but in reality

1 the Vincent Thomas Bridge is a four lane bridge and I do
2 not see them or have not heard that they're going to make
3 that bridge any wider. So the -- some of the thinking
4 this goes on is it's going to attract more traffic or
5 whatever by the fact that it's six lanes while the
6 Vincent Thomas is only four lanes. It just doesn't make
7 sort of common sense to me.

8 Lastly, I'd like to -- I have a question about
9 some of the costs. The number that's been going on is
10 1.1 billion dollars, which is a lot of money and -- but
11 these things kind of tend to mushroom, and I'd like to
12 make sure that this 1.1 billion is much more transparent.
13 For instance, does that 1.1 billion allow for additional
14 purchase of right-of-way. The new bridge is going to
15 stand to the side of the old bridge on property that I'm
16 not sure if Long Beach or the state currently owns.
17 So -- and as well as realignment of say the 710 freeway
18 with new on-ramps and off-ramps with that. So I'd like
19 to know if those are part of the 1.1 billion. Thank you.

20 MR. CAMERON: Thank you.

21 PUBLIC SPEAKER: Good evening Rick and staff.
22 Thank you for the great job and literature you've
23 provided. My name is John Taleifi. I'm a resident of
24 West Long Beach and also president of West Long Beach.
25 Although, we all agree it seems that there must be

JSo-3

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1 changes or a new structure placed to replace this, I'd
2 like to say a couple things. Number one, I do support
3 and endorse the labor request to keep the labor forces
4 working on the project when that project is, of course,
5 in motion forward.
6 The other is I'd like to request, if we could,
7 in fact, have an official meeting. I want to go on
8 record to actually request that if time -- if your time
9 frame allows. Specifically, for the West Long Beach
10 Association. I'll tell you why. We are the first
11 community in all of Long Beach that is impacted by the
12 change or the additions or the improvements on this
13 bridge.
14 So Rick knows very well, West Long Beach, our
15 association is very, very cordial, if you will, in
16 working with the ports and if time allows in the future
17 with your ability to come out, we would like to have an
18 informal session such as this. So I want to thank you.
19 MR. CAMERON: Mr. Carlson or Ms. Carlson. Mr.
20 Carlson, sorry.
21 PUBLIC SPEAKER: Good evening. My name is Thor
22 Carlson. I'm a citizen of Long Beach. I'm here to talk
23 about the design of the bridge. We have an opportunity,
24 a once in a lifetime opportunity here in Long Beach to
25 create an international icon for our city. Something

TC

1 that is going to be here for the next hundred years. I
2 think we've really shortchanged ourselves on the design
3 of this bridge. There are phenomenal architects who can
4 design a much better bridge, have proved it again and
5 again.

6 Just one name I'd like to throw out there is
7 Santiago Calitrambo who is an international architect,
8 sculptor, and artist and has created icons for cities
9 around the world that generate tourist dollars and
10 economic development for the cities that have his
11 bridges. I think that's something we deserve. We've got
12 to stop shortchanging ourselves with second rate mediocre
13 architecture and actually design a world class bridge for
14 our city. Thank you.

15 MR. CAMERON: Thank you. The last name is
16 Salera.

17 PUBLIC SPEAKER: Oh, my goodness. I'm so
18 nervous with all these men. (Inaudible.) I live here in
19 west side alongside the freeway. Who's over here? The
20 ladies? Oh, my God. I'm getting nervous. May I have my
21 card. (Inaudible.) Well, you know since 2003 we've been
22 having these meetings. We started with the 710. That's
23 the first project that we had a meeting here and now
24 later on we shout go to the air pollution. Okay. But my
25 property alongside the 710 -- south 710 freeway right

TC

S-1

S-1

1 here on -- by 7th Street. But I know everybody need
2 jobs. I need job too. But anyway. Okay.

3 I face you because I'm talking to you guys.
4 (Inaudible.) Okay. Fine. I want job but first think of
5 us the 710 south freeway. My property is there. I'm
6 really 24 hours I'm living there. The trucks making me
7 nervous. I live there 40 years. I'm going to die. I
8 don't know when. My birthday was this week, 77, anyway.
9 I want the job too, but don't work on the 710 south. You
10 folks have the money. Come on. 710 south first.

S-2

11 Get the trucks one lane so you don't -- we get
12 accident. We get death. The other one was killed. At
13 the bridge did anybody die in there? Nobody died in
14 there; right? The trucks -- they go with the cars.
15 Okay. So I want one lane for the trucks because you
16 getting too much business all the time and all that stuff
17 coming here. So I'm looking for the future. So now
18 build the 710 before you proceed with the bridge. I'm
19 telling you. (Inaudible.)

20 I know meeting the people living there and the
21 air we breathing our fine. We get the pollution, but you
22 don't guarantee that we're not going to get cancer from
23 there or whatever. Okay. Now can you reroute the bridge
24 make the trucks or whatever go off to 710, maybe some of
25 them. Select truck and put them on Pico or Alameda, you

1 know. Get -- you build a bridge and make a ramp for the
2 other trucks getting off the load on the 710 freeway
3 south. That's my backyard. That's why I'm worried about
4 that. Well, as far as the business is going -- she came
5 over.

6 She fight me for the bridge but how about fight
7 for 710 south. I want the trucks one way. I don't want
8 to be driving when the truck is coming behind me. I'm so
9 small, but I'm still driving. (Inaudible.) 40 years now
10 I live there. My husband is retired. I guess I got to
11 put in the record. I want 710 south before bridge. Do
12 not work on the bridge until you do my 710.

13 MR. CAMERON: Okay. Thank you everybody. I
14 don't have anymore speaker cards. Anybody who has not
15 spoken who would like to come up and provide some
16 comments please do so. Going once, going twice -- when
17 you're done, could you fill out a speaker card.

18 PUBLIC SPEAKER: Gary Anderson. I live in Long
19 Beach. I've noticed recently the open bay bridge they
20 are rebuilding and they say in the news a couple weeks
21 ago they were showing the pavement they were installing
22 comes from China. I don't want a bridge with anything
23 from China or any where else other than the United
24 States.

25 MR. CAMERON: Thank you. Okay. Once again,

S-2


GA

1 going once, going twice. I'm going to close the public
2 hearing. I do want to remind everybody, first of all,
3 thank you for coming this evening and being here and
4 providing your comments. I would also like to remind
5 everybody that the official comment period at this time
6 closes on March 22.

7 You can find the materials on our Web site. My
8 staff is roaming around. You have our contact
9 information, if you'd like to contact us. I would
10 strongly recommend that you provide written comments.
11 This is on the record, but I think written comments help
12 us when we're finalizing the environmental document to
13 make sure all your comments have been addressed. And
14 with that have a good evening. Thank you.

15 (The proceedings were
16 concluded at 7:35 p.m.)

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2 CERTIFIED COPY CERTIFICATE
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7
8 I, Natalie Rodriguez, CSR No. 12851, a Certified
9 Shorthand Reporter in the State of California, certify
10 that the foregoing transcript constitutes a true and
11 correct copy of the original transcript taken on February
12 24, 2010.
13 I declare under penalty of perjury under the laws of
14 California that the foregoing is true and correct.
15
16 Executed at Covina, California this 8th day of
17 March, 2010.
18
19 
20
21 Natalie Rodriguez, CSR No. 12851
22
23
24
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**4.4 RESPONSES TO COMMENTS ON DRAFT EIR/EA AND PUBLIC HEARING
COMMENTS**

Responses to Comments from Elected Officials

Congresswoman Laura Richardson, 37 District, Dated 2/24/2010

LR(A): Your comments are acknowledged and will be transmitted to the Board of Harbor Commissioners.

Assemblyman Warren Furutani, 55th District, Dated 3/19/2010

WF(A): Your comments are acknowledged and will be transmitted to the Board of Harbor Commissioners.

Long Beach City Council Member Robert Garcia, Dated 3/19/2010

RG: The Port and Caltrans agree that the new bridge should be architecturally significant and aesthetically relevant. It will be an important structure that will serve as a signature landmark for the City of Long Beach. For this reason, bridge architecture and aesthetics were evaluated during aesthetics workshops that considered various design options based on aesthetics, cost, constructability, seismic performance, and other factors.

As shown in the night simulation in the EIR/EA (Exhibit 2.1.7-17), aesthetic lighting is included in the preliminary design, and the potential impacts from the lighting have been analyzed in the EIR/EA. A final lighting plan will be developed during the final design phase of the project. The Port and Caltrans understand the iconic nature of the bridge, and the final lighting design will be in keeping with that understanding and should not require additional environmental review beyond the analysis contained in Section 2.1.7.3 of the EIR/EA.

Responses to Comments from State Government

California Department of Fish and Game, Dated 3/15/2010

CDFG: The Port and Caltrans acknowledge the fee requirement and will submit the filing fee to the California Department of Fish and Game at the time the Notice of Determination for the EIR/EA is filed with the Los Angeles County Clerk. The potential impacts on the biological environment are set forth in Sections 2.3 and 3.2.3 of the Draft EIR/EA.

Responses to Comments from Regional Government

Southern California Association of Governments, Dated 3/10/2010

SCAG-1: The Port and Caltrans acknowledge that the project is one of regional significance, as is noted in the comment. Responses to detailed comments are provided below.

SCAG-2: The horizon year for the Traffic Study was determined when the traffic study was undertaken in December 2005. At that time, the SCAG horizon year was 2030 and the 2008 RTP travel forecasting data for year 2035 were not available. Implicit in the comment is that the use of the 2035 data may yield different traffic forecast volumes and potentially different traffic impacts. The sensitivity analysis described below demonstrates that there would be no difference in adverse traffic effects. The sensitivity analysis was performed to determine if there were meaningful differences between traffic forecasts and analytical results for years 2030 and 2035. A roadway link operations analysis and ramp junction analyses for year 2035 were performed. Results of these analyses indicate that the traffic findings and conclusions based on the year 2030 traffic still apply for year 2035 and that the proposed design will accommodate the projected year 2035 traffic volumes. The year 2035 analysis is presented in Appendix J of the Draft Project Report and is summarized in the EIR/EA in Section 2.1.5.3 in a new subsection at the end of the section headed "Adverse Effects to Traffic during Operation of the Bridge Replacement Alternatives". The text to be added to the EIR/EA is as follows:

Sensitivity Analysis for Year 2035 Traffic Forecasts

This section summarizes the analysis and findings of year 2035 traffic conditions. The rate of growth in traffic along the Ocean Boulevard corridor within the study area would be 0.5 percent annually or a total of 2.5 percent for the 5 years from year 2030 to 2035. The growth rate was developed using traffic projections from the latest Port Area Model, which is based on the SCAG 2008 RTP model, with refinements made in the port area, and uses the forecasts recited in the comment.

Using the 2.5 percent growth rate, the roadway segment densities for year 2030 were adjusted upward to reflect a 2.5 percent increase. Similarly, the densities developed for the ramp junction analyses were adjusted upward. The roadway segment densities for years 2005, 2015, 2030, and 2035 for both the No Action/Rehabilitation and Bridge Replacement Alternatives are presented in Table 1 below. The table also shows the roadway segment results with and without the EB-to-NB SR 47 flyover ramp analyzed in the traffic study.

The results show that the only reduction in LOS to a condition worse than LOS D would be on the EB uphill side of the Gerald Desmond Bridge for the PM peak hour for the Bridge Replacement Alternatives with the SR 47 flyover ramp, which is projected to operate at LOS E, even though the density value increased by only 0.8 pc/mi/ln from 2030 to 2035.

The higher densities on this roadway segment are related to the convergence of EB through traffic, the on-ramp from the SR 47 interchange, and the on-ramp from Pier T all occurring on an uphill grade; however, the results indicate that the proposed design can adequately accommodate the projected year 2035 traffic.

For the ramp junction analysis, as shown in Table 2 below, none of the ramp junctions are projected to operate at a level worse than LOS C in year 2035.

In summary, none of the roadway segments or ramp junctions is expected to operate at a failing level of service (LOS F) in 2035. With either Bridge Replacement Alternative or the SR 47 flyover ramp in place, only one roadway segment would operate at LOS E; therefore, the findings and conclusions reached for year 2030 would also apply for year 2035.

Table 2
Year 2015, 2030, and 2035 Forecast Peak-Hour LOS at Ramp Junctions

Ramp Location	AM Peak		MD Peak		PM Peak	
	Density (pc/mi/ln)	LOS ¹	Density (pc/mi/ln)	LOS ¹	Density (pc/mi/ln)	LOS ¹
Year 2015 No Action/Rehabilitation Alternatives						
<i>WB Ocean Boulevard</i>						
Pico Avenue On-Ramp Merge to Ocean Boulevard	16.8	B	16.0	B	17.7	B
Horseshoe Off-Ramp to Pier T Avenue	24.9	C	23.3	C	24.5	C
<i>EB Ocean Boulevard</i>						
Horseshoe On-Ramp from Pier T Avenue	16.9	B	17.8	B	20.2	C
Ocean Boulevard to SR 710/Downtown Diverge	14.2	B	15.6	B	20.0	B
Ocean Boulevard to Pico Avenue Off-Ramp	6.9	A	5.6	A	13.7	B
Year 2015 Bridge Replacement Alternatives						
<i>WB Ocean Boulevard</i>						
Pico Avenue On-Ramp Merge to Ocean Boulevard	17.0	B	14.4	B	16.4	B
Horseshoe Off-Ramp to Pier T Avenue	21.5	C	20.3	C	20.4	C
<i>EB Ocean Boulevard</i>						
Horseshoe On-Ramp from Pier T Avenue	18.9	B	19.8	B	22.9	C
Ocean Boulevard to SR 710/Downtown Diverge	22.5	C	24.6	C	25.8	C
Ocean Boulevard to Pico Avenue Off-Ramp	17.6	B	20.3	C	18.0	B
Year 2030 No Action/Rehabilitation Alternatives						
<i>WB Ocean Boulevard</i>						
Pico Avenue On-Ramp Merge to Ocean Boulevard	17.9	B	17.0	B	18.6	B
Horseshoe Off-Ramp to Pier T Avenue	26.8	C	25.0	C	26.2	C
<i>EB Ocean Boulevard</i>						
Horseshoe On-Ramp from Pier T Avenue	17.4	B	18.2	B	21.3	C
Ocean Boulevard to SR 710/Downtown Diverge	15.0	B	16.2	B	21.9	C
Ocean Boulevard to Pico Avenue Off-Ramp	6.9	A	6.6	A	13.8	B
Year 2030 Bridge Replacement Alternatives						
<i>WB Ocean Boulevard</i>						
Pico Avenue On-Ramp Merge to Ocean Boulevard	18.8	B	16.7	B	19.6	B
Horseshoe Off-Ramp to Pier T Avenue	23.1	C	22.0	C	22.5	C
<i>EB Ocean Boulevard</i>						
Horseshoe On-Ramp from Pier T Avenue	20.1	C	21.5	C	24.7	C
Ocean Boulevard to SR 710/Downtown Diverge	24.0	C	27.6	C	28.6	D
Ocean Boulevard to Pico Avenue Off-Ramp	18.9	B	23.5	C	20.3	C
Year 2035 No Action/Rehabilitation Alternatives						
<i>WB Ocean Boulevard</i>						
Pico Avenue On-Ramp Merge to Ocean Boulevard	18.3	B	17.4	B	19.1	B
Horseshoe Off-Ramp to Pier T Avenue	27.5	C	25.6	C	26.9	C
<i>EB Ocean Boulevard</i>						
Horseshoe On-Ramp from Pier T Avenue	17.8	B	18.7	B	21.8	C
Ocean Boulevard to SR 710/Downtown Diverge	15.4	B	16.6	B	22.4	C
Ocean Boulevard to Pico Avenue Off-Ramp	7.1	A	6.8	A	14.1	B
Year 2035 Bridge Replacement Alternatives						
<i>WB Ocean Boulevard</i>						
Pico Avenue On-Ramp Merge to Ocean Boulevard	19.3	B	17.1	B	20.1	C
Horseshoe Off-Ramp to Pier T Avenue	23.7	C	22.6	C	23.1	C
<i>EB Ocean Boulevard</i>						
Horseshoe On-Ramp from Pier T Avenue	20.6	C	22.0	C	25.3	C
Ocean Boulevard to SR 710/Downtown Diverge	24.6	C	28.3	D	29.3	D
Ocean Boulevard to Pico Avenue Off-Ramp	19.4	B	24.1	C	20.8	C

EB – eastbound; LOS – level of service; pc/mi/ln – passenger cars per mile per lane; WB – westbound
¹ LOS criteria for ramp junction areas are in density (pc/mi/ln). Density ranges for different LOS types: LOS A, 0 – 10; LOS B, 10.1 – 20; LOS C, 20.1 – 28; LOS D, 28.1 – 35; LOS E, 35.1 – 43; LOS F, > 43.

- SCAG-3:** The Port and Caltrans concur that the project would not result in permanent employment or associated population growth (see EIR/EA Section 2.1.3.1.3).
- SCAG-4:** The Port and Caltrans agree that regional traffic is expected to increase, with or without the proposed bridge replacement. The Port also acknowledges that SCAG considers the project to be consistent with RTP Goals G1-G4 and G6.
- SCAG-5:** The Port and Caltrans acknowledge that exceedances of SCAQMD daily emissions thresholds and GHG emissions cannot be fully mitigated; therefore, only partial consistency with RTP Goal G5 can be achieved.
- SCAG-6:** Although the comment indicates that Goal G7 (maximize the security of the transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies) does not apply, construction of either of the Bridge Replacement Alternatives will include intelligent transportation system (ITS) components, such as closed-circuit television (CCTV) cameras that will feed directly into the Port's Security Command and Control Center. Furthermore, either Bridge Replacement Alternative will also be designed to endure more intense seismic activity than the existing bridge, thus improving recovery planning after a major seismic event. The Bridge Replacement Alternatives would therefore enhance Goal G7 within the project area.
- SCAG-7:** The Port and Caltrans concur that the project is located within industrial-zoned areas of the Port and that Growth Visioning Policies GV1.2, GV1.3, and GV1.4 are not applicable to the proposed project. The Port also acknowledges that the project is consistent with Policy GV1.1
- SCAG-8:** The Port and Caltrans agree that the project is located within industrial-zoned areas of the Port and is intended to improve Port and non-Port-related traffic within the project area; therefore, Policies GV 2.1, 2.2, 2.3, and 2.4 are not applicable to the proposed project.
- SCAG-9:** The Port and Caltrans agree that the project is located within industrial-zoned areas of the Port and is intended to improve Port and non-Port-related traffic within the project area; therefore, Policies GV 3.1, 3.2, 3.3, 3.4, and 3.5 are not applicable to the proposed project.
- SCAG-10:** The Port and Caltrans concur that the project is located within industrial-zoned areas of the Port and that the proposed project will mitigate project effects on sensitive species to less than significant. The proposed project is not sited in an area that contains agriculture, rural, recreational, or environmentally sensitive areas; therefore, Policy GV P4.1 is not applicable.
- SCAG-11:** The Port and Caltrans concur that the project is located within industrial-zoned areas of the Port and will focus development within urban areas and will not affect sensitive areas or habitats; therefore, the proposed project is consistent with Policy GV P4.2.
- SCAG-12:** The Port and Caltrans concur that the project adequately addresses project-related impacts and avoidance/minimization and mitigation measures with regard to additional impervious surface water runoff and treatment, construction debris recycling, and reduction of impacts to air quality; therefore, it is generally consistent with Policies GV 4.3 and 4.4.
- SCAG-13:** As required by CEQA, the EIR/EA identifies feasible mitigation measures that can minimize potentially significant adverse impacts of the project. In the course of seeking to identify feasible mitigation measures that could reduce the significant effects associated with the project, the Port and Caltrans surveyed a wide variety of source materials, including the Mitigation Monitoring and Reporting Program (MMRP) accompanying SCAG's 2008 RTP Final EIR (SCAG, May 2008). Certain measures, such as those pertaining to Aesthetics and Visual Impact, Air Quality, Geology, Hazardous Materials, and Noise, have been incorporated, in whole or in part, in the project's list of applicable mitigation measures. Based on information obtained from this survey and other efforts, the Port and Caltrans have developed the list of mitigation measures that the EIR/EA

recommends for the project. A comprehensive MMRP will be adopted and implemented as required by CEQA. In accordance with your request, a copy of the MMRP will be provided to SCAG.

South Coast Air Quality Management District, Dated 4/2/2010

SCAQMD-1: The comment is noted. Responses to detailed comments are provided below.

SCAQMD-2: Regarding vessel traffic, there will be some construction activities that would affect properties adjacent to the bridge, but this would have no effect on ship access to Port facilities or piers (EIR/EA Section 2.1.6.3). Both before and after construction and operation of the Build Alternatives considered in the EIR/EA, the only access to the Cerritos Channel terminals in the Port is and will be through the Back Channel under the bridge. This access will be maintained throughout construction and operation of the project. Because rerouting of vessel movements would not be required during construction, the EIR/EA does not contain an analysis of air emissions that might result from such rerouting of vessels.

The Port does not anticipate that there would be any quantifiable additional vessel-related air emissions associated with an increased bridge height for two reasons: (1) navigational constraints in the Back Channel limit the size of ships that can pass under the bridge, and (2) the limited capacities of the Cerritos Channel terminals do not allow for a mix of vessel calls that would increase air emissions. A detailed discussion of the potential effects of the bridge height increase on vessel traffic is provided in EIR/EA Section 2.1.2.3. As is noted in that discussion (under Overall Capacity/Maritime Growth Inducement Potential), only the existing Pier A and planned Pier S container terminals would be potentially affected by the bridge replacement. While the bridge replacement would make it possible for the largest ships (11,000 - 11,999 TEU capacity) to gain access to these two piers, it is not likely that they would call at Pier S because it would be one of the smallest container terminals in the Port and would therefore not provide adequate on-dock container storage capacity. It is possible that in the future Pier A could receive an estimated one call per week for a ship of the largest size; but even if the additional increased air draft is provided, there are still navigational constraints that make this currently infeasible. Current navigational safety concerns are such that widening the channel would be needed, as well as increasing the channel depth. Neither of these improvements is currently proposed; therefore, the largest ships able to navigate the channel safely even with the increased clearance from the new bridge would be of the 8,000 - 8,999 TEU capacity. As a result of the above-described conditions, the bridge replacement would not meaningfully increase the capacity of Pier A, even though it eliminates the air draft constraint for the largest ships.

Regarding emissions associated with partial closing of road or rail lines during construction, as explained in more detail in the response to SCAQMD-9, there will be only minimal localized rerouting of truck traffic, none of which would require the use of alternate routes, and the rerouting that would be necessary would occur only within the immediate project vicinity. Similarly, there will be only minimal impact on a single rail line for which a temporary replacement (called a "shoofly") will be constructed. Because traffic would continue to use current routes and because the affected rail line would remain operational during the construction period, no additional air quality analysis related to detours is necessary.

SCAQMD-3: The proposed project would not have any effect on existing rail lines, including all rail lines serving on-dock facilities. As discussed in the response to SCAQMD-9 below, a short section of one existing sparsely used rail line will require realignment, but a temporary "shoofly" would be provided and no interruption of service would occur. The Bridge Replacement Alternatives, including all related structures, were designed taking into account the Port's rail plans so that neither of the Bridge Replacement Alternatives would limit the Port's ability to expand on-dock rail capacity.

SCAQMD-4: In accordance with CEQA requirements, responses to SCAQMD comments will be provided prior to certification of the EIR by the Board of Harbor Commissioners.

SCAQMD-5: Please see the response to SCAQMD-2.

SCAQMD-6: Please see the response to SCAQMD-3.

SCAQMD-7: The “Trend Analysis” discussion is provided as part of the NEPA-required project-level conformity analysis following FHWA and EPA Guidelines in their March 2006 guidance: *Transportation Conformity Guidance for Qualitative Hot-Spot Analysis in PM_{2.5} and PM₁₀ Nonattainment and Maintenance Areas* (Guidelines). EIR/EA Exhibit 2.2.5-3 is provided based on those guidelines for national standards. The included discussion is intended to show the overall change or “trend” of ambient pollutant concentrations in the project area over time. A review of this supporting data/information demonstrates that any increase in the emissions due to traffic changes associated with the project would be offset by decreasing background concentrations, as well as decreases in on-road vehicle emissions trends (reference: Guidelines - Section 4.3, part A). A comparison with state standards is included in Table 2.2.5-4 (EIR/EA). It should be noted that the declining “trend in pollutant ambient concentrations” would be the same whether compared to federal or state standards. This information helps the reader to better understand the context in which the project is being evaluated, as well as being required under the conformity requirements.

Data taken from the North Long Beach air monitoring station (ARB site #70072; start date 5/7/1969) is presented in Table 2.2.5-4. This information was used for trend analysis because it provides the most complete and continuous data recording throughout the years. This station has continuous records for all criteria pollutants (except lead) for every year from 1999 to the present. The other monitoring station in the area mentioned by the commenter (i.e., South Long Beach Station; 1305 E Pacific Coast Highway, ARB #70110) only started operation in 2003 (8/7/2003); it monitors PM concentrations and has only incomplete records of annual average data. Since the point of the information presented in Table 2.2.5-4 is to illustrate an historical trend of recorded ambient data for criteria pollutants, the choice of station noted above best fulfills that purpose. Furthermore, data from the nearest Port monitoring station (start date: 2006) is provided in Table 2.2.5-5 of the Draft EIR/EA for comparison with data from the North Long Beach station.

SCAQMD-8: Responses to the three bulleted items are as follows:

- Release heights of 3 ft (for passenger cars) and 15 ft (for heavy duty trucks) were initially established in the AERMOD model for the line sources representing passenger cars and heavy trucks, respectively. Each line source (representing a segment of the project corridor) was then mathematically converted into equivalent volume sources by AERMOD for use in the dispersion modeling. In addition, the terrain digital elevation coordinates of the bridge and approach roads were also developed (using the AERMAP module of the model) for use in the dispersion model.

To use the results of dispersion modeling in the health risk model, HARP on-ramp and HARP, the following steps were taken:

- Generated source pathway was exported; a file with .p1 extension was created
- All references to the line source (e.g, “source group ALL” were edited out to leave only the information on the volume sources
- The source pathway was imported back to project setting in AERMOD – a set of individual volume sources generated that overlap the original line sources
- The length of the side of all new volume sources were changed to the value of the original line source segment
- The initial lateral dispersion of each new volume source was changed to the value of the source generated in original line source

- The original line sources were then deleted from the source list
- The terrain data (using AERMAP module) was imported again into the project.

Because the individual volume sources were generated as part of each line source segment (with original release heights of 3 ft and 15 ft for autos and trucks, respectively) and the terrain elevation data were incorporated, the model input information therefore faithfully represents the locations and characteristics of the emission sources relative to the bridge/highway and the bridge/highway relative to its surroundings.

- The calculations using speciated emissions are shown in Attachment D2 to the Air Quality Technical Study (AQTS) and were carried in the modeling through the files with the names ended in ".ems", as is described in the "Notes_CD.doc" included in the HRA CD that was provided as Attachment D3 to the AQTS Report. The CARB speciation tables were provided in an attachment to Appendix D (HRA).
- The only source names that do not match are those for the Pico ramps. Table D-2 includes: ONPICO (Pico on-ramp), and OFFPICO (Pico off-ramp). These names in the model appear without the last letter: ONPIC (Pico on-ramp), and OFFPIC (Pico off-ramp). The correction has been provided in the Final EIR/EA. A footnote has also been added to the table explaining that for AERMOD modeling, each "link ID followed by letter A" is used for passenger car (automobile).

SCAQMD-9: Temporary changes to local traffic flow in the immediate vicinity of the bridge would be needed during several stages of the construction period, as described in EIR/EA Section 2.1.5.3. The SB-to WB connector from I-710 to Ocean Boulevard would be closed during the second stage of construction, but would be replaced with a temporary ramp connection using Pico Avenue. Also during the second and third stages of construction, WB traffic on Ocean Boulevard desiring access to Pier T would be directed by signage to proceed westerly to the interchange with SR 47, make a U-turn, and then proceed back easterly along Ocean Boulevard to the EB exit to Pier T.

The interim detour alignments would not require diversion of traffic to alternate routes, add a considerable length to the traveled road, or move traffic closer to any sensitive receptor. Minor variations in traffic behavior would occur during the construction period, but they would be isolated to specific construction zones and would be limited to very short durations of time during which vehicles might be queuing. These effects would be very small in the context of the overall impact assessment and would not be of sufficient magnitude to cause a measurable change in the results of the emissions analysis.

There is a short portion of an existing rail line that crosses from northwest to southeast beneath the existing bridge's west approach road just east of the horseshoe ramps that would require temporary relocation while bridge-related construction is occurring. This is an infrequently used rail line with an estimated 4 to 5 movements per day. A temporary "shoofly" would be constructed adjacent to the existing track prior to relocating the affected portion of the rail line, thereby allowing continued service during the construction period. The change in rail movements associated with the construction period activity would be minimal and therefore would not change the results of the emissions analysis. Because traffic would continue to use current routes and because the affected rail line would remain operational during the construction period, no additional air quality analysis related to detours is necessary.

SCAQMD-10: The Final EIR/EA Section 2.2.5.3 includes the requested refined analysis for localized construction impacts related to NO_x emissions for years 2 and 3 of the project construction period using dispersion modeling. The modeling results, summarized in Table 3, show that the concentrations of NO₂ at the nearest sensitive receptors remain below the CAAQS for 1-hour NO₂ during the peak construction activities; therefore, no change in impact conclusions would occur.

Table 3 Localized NO₂ Concentration during Peak Construction Activities					
Receptor Type	Nearest Receptors	Project Impact at the Nearest Sensitive Receptors (µg/m³)	Distance from Construction Site Boundary (m)	Maximum Project Impact + Background (µg/m³)	SCAQMD Threshold (µg/m³)
School	Cesar Chavez Elementary	31	457	269	338
	Edison Elementary	27	488	265	338
Daycare	Childtime Learning Center	41	663	279	338
	Lucy's Baby Care	64	1,178	302	338
Hospital	St Mary Medical Center	52	2,200	290	
Convalescent	The Breakers of Long Beach	27	1,557	265	

a As recommended by the SCAQMD, offsite haul truck transport emissions are considered offsite emissions and were not included in the modeling; however, onsite truck emissions were included in the modeling (SCAQMD 2005).

b NO₂ concentrations were calculated using the conversion rate from NO_x to NO₂ based on the distance of receptor from the construction site boundary (SCAQMD, 2003).

Table 2-4. NO₂-to-NO_x Ratio as a Function of Downwind Distance

Downwind Distance (m)	NO ₂ /NO _x Ratio
20	0.053
50	0.059
70	0.064
100	0.074
200	0.114
500	0.258
1000	0.467
2000	0.75
3000	0.9
4000	0.978
5000	1

c Background concentration of 238 µg/m³ was estimated based on the ambient concentration trends and the last 3 years of monitored data at the Port of Long Beach Inner Harbor Monitoring Station (<http://polb.airsis.com/HistoricalSummary.aspx>). These data are preliminary; however, the estimate provides a conservative value that is higher than the North Long Beach Monitoring Station (215 µg/m³).

SCAQMD-11: Responses to the three bulleted items are as follows:

- All feasible mitigation measures, including measures imposed by SCAQMD and measures prescribed by the Port, have been included in the impact analysis. For purposes of estimating the effectiveness of construction period mitigation measures, a conservative approach was taken in which the estimated reduction of 15 percent for NO_x was used (URBEMIS 2007; Version 9.2) because it is only regional NO_x emissions for which an exceedance of the significance threshold is estimated. Further reductions in emissions, resulting from the EPA Tier 4 non-road engine standards, while they may occur, cannot be guaranteed; therefore, credit for those additional benefits were not taken to present a conservative portrayal of impacts. However, it should be noted that the project construction specifications will include a provision requiring the use of Tier 4 equipment should such equipment become available for general use at the time of bridge construction. Tier 4 equipment is expected to begin to become available in the 2011-2012 time frame, which may permit some amount of such equipment to be used for construction work on the bridge; however, because it is not known how much Tier 4 equipment can be utilized on the project, an estimate of the emissions reduction benefit cannot be reliably calculated. For this reason, credit for the additional likely reduction attributable to the use of Tier 4 equipment has not been taken.
- The emission estimates presented in the Final EIR/EA air quality analysis have been calculated using the latest available data, assumptions, and emission factors taken from the OFFROAD 2007 Model. This source incorporates the estimated benefits from improvements in engine technology to the level of Tier 3 equipment, which

constitutes the inventory of equipment expected to be universally available for work on the project. Offsite haul truck emissions, used for purposes of estimating trips hauling away construction debris, were estimated using the EMFAC2007 model, which is also the most recent data set for that emissions source.

- Electric power would be needed to power a variety of construction equipment. Diesel-powered generators would be primarily used to power hand tools and compressors that would be needed at various unspecified locations throughout the construction period, whereas power taken from temporary stationary power poles would more likely be used for stationary construction equipment, such as power saws, drill presses, or similar fixed equipment. Electricity taken from fixed power poles will be used to the extent practicable, rather than from generators, but such application will not be universally applicable, due to not only the need for mobile equipment to be used at many locations, but also because a substantial portion of the construction activity will be occurring over water, which would make such use infeasible. During the final design stage of project development, the Port will determine where fixed power sources may be feasibly used and will require the contractor to take power from existing or temporary fixed power sources in lieu of generators, as required in Mitigation Measure AQ-C4. Because the particulars of the application of fixed source power cannot be known at the present time, an estimate of associated emissions reduction would be speculative; therefore, it has not been calculated.

SCAQMD-12: Responses to the three bulleted items are as follows:

- The historical data reported in the document were taken from the CARB, EPA, and/or SCAQMD Web sites. At the time of preparation of the draft report, the available data for 2008 had 48 percent coverage of the collected data (i.e., processed and validated sufficient to be reported on the Web site). Currently, the data reported on the same Web site has 98 percent coverage; therefore, they are different from those that were reported earlier. The Final AQTS and EIR/EA include the latest data available from the monitoring sites.
- The Final EIR/EA includes the most recent available data.
- The Final EIR/EA has been updated to reflect the most recent SCAQMD LST threshold for NO_x. It should be noted that the refined analysis of the maximum NO_x emissions from peak construction activities (Years 2 and 3 of project construction) was conducted using dispersion modeling, which concludes that no localized significant impact would be anticipated from construction-related pollutant emissions. Please also see the response to SCAQMD-10.

Responses to Comments from Local Government

City of Long Beach, Department of Development Services, Dated 3/22/2010

- LBDS-1:** Your comments are acknowledged and will be transmitted to the Board of Harbor Commissioners.
- LBDS-2:** Responses regarding your comments and concerns to accommodate non-motorized access are addressed below in responses LBDS-3 through LBDS-8.
- LBDS-3:** The proposed bridge and Ocean Boulevard are currently designated as the future extension of SR 710 by the California legislature in Section 622.1(a) of the State of California Streets and Highways Code as described below:

622.1. (a) Route 710 shall also include that portion of the freeway between Route 1 and the northern end of Harbor Scenic Drive, that portion of Harbor Scenic Drive to Ocean Boulevard, that portion of Ocean Boulevard west of its intersection with Harbor Scenic Drive to its junction with Seaside Boulevard, and that portion of Seaside Boulevard from the junction with Ocean Boulevard to Route 47.

The reference in the Draft EIR/EA to this area being part of SR 710 was not intended to act as a designation, but it was instead merely describing the legislature's designation.

Subsequent to opening of the new bridge, it will be transferred from the Port to Caltrans upon completion of the route adoption by the California Transportation Commission (CTC), consistent with California law. CVC Section 21960 does not automatically prohibit bicycle use on designated freeways or expressways but instead leaves it to the discretion of the department or local agency as described below.

21960. (a) The Department of Transportation and local authorities, by order, ordinance, or resolution, with respect to freeways, expressways, or designated portions thereof under their respective jurisdictions, to which vehicle access is completely or partially controlled, **may** (Bold added) prohibit or restrict the use of the freeways, expressways, or any portion thereof by pedestrians, bicycles or other non-motorized traffic or by any person operating a motor-driven cycle, motorized bicycle, or motorized scooter.

The Port supports the use of the bridge by cyclists and has no intention of taking any action in the future to prohibit that use. Caltrans has determined that at least initially, bicyclists will not be prohibited from using the proposed bridge. The path that a cyclist would take to cross the bridge is shown in Final EIR/EA Exhibit 2.1.5-3. The new bridge will provide a 10-ft-wide shoulder for use by cyclists to cross the bridge. Currently, cyclists are required to climb a series of stairs at either end of the bridge to access the sidewalk or to share the travel lane with vehicles due to the lack of shoulders. Cyclists will be prohibited from using the Ocean Boulevard ramps due to safety concerns associated with a required merge from the Ocean Boulevard connection (center/left lanes of the bridge) across high-speed freeway traffic to get to the safety of the right-hand shoulder; however, as previously discussed, the bridge will be adopted into the State Highway System (SHS), and consistent with CVC Section 21960, Caltrans at some point in the future could prohibit future bicycle access on the bridge for safety or other reasons.

Having the City retain jurisdiction over the bridge is not feasible. If the City chooses not to relinquish the bridge to the State, the project would not be eligible for \$250 million in Proposition 1 Trade Corridor Infrastructure Funds (Prop. 1 TCIF) and \$49.8 million in State Highway Operation and Protection Plan (SHOPP) funds that have been allocated to the project pending transfer of the facility to Caltrans. As stated in 4.4.3 of the TCIF Baseline Agreement between the Port and the CTC dated September 29, 2008, and signed by CTC Executive Director on November 21, 2008, the State of California intends to use the SHOPP funds financed with Grant Anticipation Vehicle Revenue (GARVEE) bonds for the project. As a condition of eligibility for SHOPP funds, the CTC must adopt the bridge route into the SHS prior to the start of construction.

- LBDS-4:** The policies set forth in Caltrans Deputy Directive (DD)-64 Complete Street – Integrating the Transportation System apply to the project. Caltrans is the lead NEPA agency, the Port’s partner for the Gerald Desmond Bridge Replacement Project, and is responsible for implementation of the DD on all projects consistent with the guidelines and responsibilities as outlined in the DD. The Caltrans District 7 Bike Advocacy Department has been actively involved in the development of the project and concurs that neither designation (e.g., signing, striping) of a bicycle route nor replacement of the pedestrian walkway is required for the reasons discussed in Final EIR/EA Section 2.1.5.3. As described in DD-64, a complete street is a “transportation facility that is planned, designed, operated, and maintained to provide safe mobility for all users, including bicyclists, pedestrians, transit riders, and motorists **appropriate to the function and context of the facility.**” (Bold added) Caltrans and the Port have considered the requirements of DD-64 in balancing the multimodal alternative needs for this project with the function and context of the facility. In consideration of those needs, bicyclists will not be prohibited from using the bridge (see also LBDS-3). In the future, if a bicycle route from San Pedro to Long Beach was designated, the 10-ft-wide shoulders provide an area for use by cyclists that could function as a Class III bikeway. Additionally, the current configuration of the existing walkway is accessible by stairs only, has 6 percent grade, and does not comply with the ADA. Pedestrian access on the new bridge is not feasible. Such access could not exceed a 5 percent grade, would require a separated flat resting area for every 2 ft of rise, and would have to be accessible by all handicapped persons. Construction of an ADA-compliant pedestrian access is also not consistent with the function and context of the facility. No pedestrian walkway will be provided for either of the Bridge Replacement Alternatives because there is no other connecting pedestrian infrastructure on Terminal Island, no pedestrian attractions, and no feasible way to provide an ADA-compliant pedestrian walkway
- LBDS-5:** State and federal regulations require the inclusion of non-motorized routes in roadway improvement projects only if the facility already includes an existing major non-motorized route. The current Gerald Desmond Bridge has a walkway, but the walkway is not considered “major” per federal guidelines. The CVC (Sections 21200-21212) and Streets and Highways Code (Sections 890-894.2) identify the rights of bicyclists and pedestrians, and they establish legislative intent that people of all ages using all types of mobility devices are able to travel roads, unless prohibited under CVC Section 21960. The Port addressed this issue in a report in January 2004 in consideration of federal statute Title 23, Section 217, as amended by the Transportation Equity Act for the 21st Century (TEA-21) and the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), which states, “The Secretary shall not approve any project or take any regulatory action that will sever an existing major non-motorized route or adversely affect the safety of non-motorized traffic and light motorcycles, unless a reasonable alternate route exists or is established. [1202(c)]”.
- LBDS-6:** In addition to adding a travel lane, the new bridge would add 10-ft-wide outside shoulders. In the future, as required, the shoulder could function as a Class III bikeway should other segments of a bike route be developed in the future. The I-710 Freeway and Ocean Boulevard merge east of the bridge, with Ocean Boulevard traffic entering via the inside lanes and I-710 traffic entering via the outside lanes. Traffic traveling from I-710 is traveling at high speeds, and for the safety of the traveling public, bicycle access to the bridge or from the bridge via the Ocean Boulevard ramps will be prohibited.
- On August 10, 2006, the PDT made the determination that further consideration of a designated bicycle route on a new bridge was not warranted at this time. PDT representation at the meeting included the bikeway modal lead and staff from Los Angeles County Metropolitan Transportation Authority (Metro), City of Long Beach Public Works staff, the Senior Bicycle Program Coordinator, and staff from the City of Los Angeles and the bridge design team.
- Designating the bridge as a bicycle route would require three key steps, including Caltrans approval, designation of a safe connection to the bridge from downtown Long

Beach, and an amendment to the City's Bicycle Master Plan to designate the route. As stated, I-710 merges onto the bridge using the outside lanes. At the meeting, it was determined that it would not be safe for bicyclists connecting to the bridge from downtown Long Beach via Ocean Boulevard because bicyclists would be required to traverse two lanes of heavy traffic traveling at speeds in excess of 55 mph. In addition to high speeds and volumes entering from the I-710 freeway, the bridge currently accommodates a significant amount of heavy-duty truck traffic that uses the bridge to access marine terminals on Terminal Island and in the POLA.

As a result of the meeting, all meeting participants jointly concluded that further consideration of a dedicated bicycle route or pedestrian walkway is not compatible with this project, because: (1) The project area is within the highly industrialized areas of the Ports with no current or planned infrastructure supporting non-motorized or pedestrian uses on Terminal Island and (2) planned future improvements and existing conditions on the other adjacent bridges (Vincent Thomas and existing or proposed Schuyler Heim Bridges) also do not include dedicated facilities for pedestrian or non-motorized use.

However, in recognition of the desire to maintain continued access for bicycles, and in accordance with discussions during project development meetings, bicyclists will be allowed to use the bridge as previously discussed. In the future, as appropriate, should a future bike route connecting downtown Long Beach and San Pedro via Terminal Island be designated, the shoulders on the bridge could be designated as a Class III bikeway and function as a supporting component of a future designated route within the project area; however, due to safety concerns for cyclists due to the previously discussed traffic merges, any future designated route would likely have to be the same as described in Final EIR/EA Section 2.1.5.3 and shown in Exhibit 2.1.5-13.

LBDS-7: The Port and Caltrans have considered all applicable federal and state policies regarding accommodation of bicycles and pedestrians during the development of the Gerald Desmond Bridge Replacement Project. The 10-ft-wide shoulder could function as a Class III bikeway in the future, as required to supplement any planned future non-motorized access between Long Beach and San Pedro; however, pedestrian use/access within the POLB/POLA on Terminal Island is not compatible with Port and other industrial activities. The Ports, through efforts formalized in the San Pedro Bay CAAP, are aggressively working at reducing port-related emissions, which will greatly enhance enjoyment and health benefits of walking, biking, and all other healthy lifestyle activities.

LBDS-8: The Port agrees that other major bridges have been designed to accommodate pedestrian and bicycle access; however, the need to accommodate bicycle and pedestrian access is associated primarily with the surrounding land uses, densely populated urban areas separated by water from major employment centers and city attractions, and few reasonable alternative routes. The George Washington Bridge is located in one of the most densely populated areas in the United States and separates New Jersey from New York City. The Golden Gate Bridge is a tourist attraction itself with demands for non-motorized travel that are very different from those of the proposed bridge. Cyclist (weekday 80 to 1,600; weekend/holiday 125 to 5,000) and pedestrian (weekday up to 3,800; weekend/holiday 5,000 to 6,600) demands on the Golden Gate Bridge are substantially higher than on the Gerald Desmond Bridge (<http://goldengatebridge.org/bikesbridge/GoldenGuidelines.php>). Port staff notes only occasional use of the pedestrian walkway by pedestrians and cyclists. As indicated above, upper ranges for cyclists and pedestrians on one peak weekend would very likely be more than the entire year for the existing or proposed new bridge. Other than the proposed size of the bridges, there is little validity in the comparison of current or potential future use of these bridges by pedestrians or cyclists to the uses of the bridges cited in the comment. Nevertheless, bicyclists will not be prohibited from using the proposed bridge, and the 10-ft-wide shoulders could be designated as a Class III bikeway as necessary in the future.

Long Beach Unified School District, Dated 3/22/2010

LBUSD-1: Your comments are acknowledged and will be transmitted to the Board of Harbor Commissioners; responses to the detailed comments are provided below.

LBUSD-2: The Port acknowledges the presence of the two schools noted in the comment. The distances of the two schools (Cesar Chavez and Thomas Edison) from the project, as stated in the comment, are inaccurate. As is noted in the response to comment LBUSD-7, the distances from Cesar Chavez Elementary School to the nearest pile-driving activity would be 1,535 to 1,610 ft, and the distances from Thomas Edison Elementary would be 2,260 to 2,626 ft. Both of these schools have been taken into account in the impact analyses presented in the EIR/EA. Please see responses to LBUSD-3 through -10 for detailed responses to concerns raised regarding TAC exposure, health risk, and noise.

LBUSD-3: The primary source of TACs from construction activities would be the emission of DPM from operating heavy-duty construction equipment on the construction site. The analysis of construction impacts on air quality, provided in Section 2.2.5.3 of the EIR/EA, shows that the peak daily emissions for PM₁₀ (a recognized surrogate for DPM) (OEHHA, 2003) would be expected to be below the thresholds established by SCAQMD for impact significance at both the regional and localized levels. This indicates that, even under worst-case daily assumptions, construction-related DPM emissions are not expected to reach a level constituting a significant impact, as defined by SCAQMD.

Furthermore, it is useful to put the amount of construction emissions into an appropriate context. As discussed in the HRA section of the EIR/EA, an estimate of total construction emissions of DPM for the 5-year duration of project construction (using the worst-case daily emissions for each construction year), only amount to 2 to 2.3 percent of operational emissions, when compared with the 70-year exposure period used for purposes of HRA analysis. Because nearly all construction activities would occur prior to the opening year of the new bridge, the year-by-year risk from construction emissions would be smaller than the risk from operational emissions from the project corridor on an annual basis.

Moreover, it should be noted that the analysis procedure employed for the project used the more conservative 'Derived Method' for point-estimate of exposure to calculate project-related cancer risk, rather than the less conservative 'Derived Adjusted Method'. The former uses the 95th percentile (i.e., high-end) breathing rate for assessment of cancer risk by the inhalation pathway, whereas the latter recommends the use of the 80th percentile value (i.e., the mid-point value for breathing pathway), to assess risk. The Derived Method provides a more conservative approach, the result of which is an estimated order of magnitude higher estimate than would be produced using the Derived Adjusted Method. The approach utilized for the EIR/EA analysis, therefore, represents a worst-case, most-conservative approach to estimating cancer risk, and even under these extreme assumptions, the results show a risk level below the level of significance.

Additionally, the analysis further used the sensitive receptor module of the HARP model, which provides a conservative algorithm to predict relative health risk for sensitive receptors, including schools, daycare centers, eldercare facilities, and hospitals.

To reflect the most recent information on the subject – using the methodology provided in the recently released OEHHA guidance (Technical Support Document for Cancer Potency Factors: Methodologies for derivation, listing of available values, and adjustments to allow for early life stage exposures; OEHHA, May 2009), the cancer risk values in the Final EIR/EA have been revised to consider OEHHA-recommended adjustments for the early life-stage exposures. The results of these revised estimated risk values are provided in Table 4 below. As the table shows, the conclusions are not changed, and even with these adjustments, the project's incremental impacts are still below the significance threshold.

Table 4 Estimate of Maximum Cancer Risk^a Impacts (with Adjustments for Early Life Stage Exposure)					
Receptor Type	Scenario/Alternative			Increment	
	CEQA Base Year	No Action	Proposed Project	CEQA	Project-Related
Residential	8.87 x 10 ⁻⁶	3.52 x 10 ⁻⁶	4.94 x 10 ⁻⁶	-3.93 x 10 ⁻⁶	1.42 x 10 ⁻⁶
Occupational ^b	2.79 x 10 ⁻⁶	1.11 x 10 ⁻⁶	1.44 x 10 ⁻⁶	-1.35 x 10 ⁻⁶	3.30 x 10 ⁻⁷
Sensitive	3.34 x 10 ⁻⁶	1.32 x 10 ⁻⁶	1.82 x 10 ⁻⁶	-1.52 x 10 ⁻⁶	4.99 x 10 ⁻⁷

^a The estimated cancer risks include OEHHA default age sensitivity factors (ASF) to adjust for higher risks to infants and children as follows:

<u>Risk adjustment period</u>	<u>ASF</u>
third trimester to age 2 years	10
age 2 to age 16 years	3
age 16 to 70 years (for residential)	1

Source: OEHHA, 2009 – page 61

^b No adjustments used for occupational risk estimates.

It should be further noted that the 2004 OEHHA Guidance proposes a year-by-year annual risk estimate to be summed (for the duration of construction) to obtain the aggregate risk for any multi-year period (Guidance for Assessing Exposures and Health Risks at Existing and Proposed School Sites Pursuant to Health and Safety Code §901(f): Final Report; OEHHA, February 2004, page 29). This proposed consideration has been included in the methodologies provided in the subsequent 2009 OEHHA document (OEHHA, May 2009). The 2009 document presents age-sensitivity adjustment factors (ASF) (based on toxicological and epidemiological studies) to account for the effect of age exposure on cancer potency. The updated cancer risk estimates presented in Table 4 include the adjustments that provide the age-sensitivity factors for sensitive receptors (including schools and daycare centers). The results indicate that, taking into account age sensitivity, the conclusions of the risk analysis remain the same, namely that the maximum project-related increment for residential cancer risk, as well as the maximum increment for cancer risk at the sensitive receptor locations (including schools and day care centers), remain well below the adverse effect criterion of 10 in one million (10 x 10⁻⁶) excess cancer risk.

It should be noted that the model-generated cancer risk estimates for sensitive receptors considers a 9-year exposure at the operational emission levels. As explained above: (1) the maximum annual emissions of toxics (mainly DPM) from construction activities are less than the average annual operational emissions (approximately 28 percent of operational DPM emissions on an annual basis); (2) the main portion of construction activities occur prior to the opening year of the new replacement bridge; (3) the duration of construction activities is only 5 years; and (4) when compared over the 70-year exposure period, construction DPM emissions only account for an estimated 2.3 percent of operational emissions; therefore, the risk from toxics produced by construction activities would be considerably less than the estimated sensitive receptor risk and thus construction emissions would not cause adverse risk impacts to the nearby schools and other sensitive receptors.

LBUSD-4: The reference exposure level (REL) of 5 µg/m³ for the DPM inhalation exposure pathway, is the currently accepted REL for use in HRA analyses. The OEHHA Web site (<http://www.oehha.ca.gov/air/allrels.html>) states that the value is developed using the revised methodology (OEHHA, 2008) and all posted RELs are updated as of December 18, 2008. The Draft EIR/EA Section 2.2.5.4 includes a section entitled Uncertainties in Risk Evaluation Results, which discusses some of the limitations of the project-level

HRA. It is true that the non-cancer REL for DPM approved by the OEHHA was not specifically based upon the considerations referenced in this comment (e.g., the potential greater sensitivity of children to toxic effects of diesel exhaust, such as allergic response, exacerbation of asthma, and developmental effects). Section 2.2.5.4 has been revised in the Final EIR/EA to include this additional information. In addition, the discussion about uncertainty in the HRA has been expanded to provide more explanation about the limitation of accurate health factors and the effect on the uncertainty in the results. Please also see the response to LBUSD-3.

LBUSD-5: As described in the response to LBUSD-3, the project HRA identifies the maximum health impacts to the sensitive receptor group, which includes schools, daycare centers, convalescent homes, and hospitals. These maximum impacts identified by the HRA can be used as indicators of the relative impact of the proposed project to LBUSD school locations. Furthermore, the cancer risk values in the Final EIR/EA have been revised to follow recent guidance from OEHHA to consider recommended adjustments for early life-stage exposure (including the weighting factor recommended by the OEHHA for children ages 2 to 15 years). Please see response to LBUSD-3.

LBUSD-6: The following is a summary of the ambient noise information presented in Table 3.9-5 from the Middle Harbor Redevelopment EIS/EIR.

Readings (with the results shown parentheses) were taken for 15-minute intervals, at the following times of day on April 17 and 18, 2006: (a) 4/17 at 17:10 (61 dBA); (b) 4/17 at 22:40 (56 dBA); (c) 4/17 at 02:25 (47 dBA); (d) 4/18 at 08:35 (57 dBA); and (e) 4/18 at 15:20 (68 dBA). Averaging (on a logarithmic basis) these five readings yields an average overall value of 62 dBA. Removing the late night reading (47 dBA) and averaging yields an average value of 63 dBA. The representative daytime readings (i.e., a, d, and e, above) yield an average of 64 dBA. The representative nighttime readings (i.e., b and c, above) yield an average of 54 dBA. Based upon this information, the text shown in the Gerald Desmond Replacement Bridge Final EIR/EA in Section 2.2.6.2 was revised as follows (**bold text** indicates changes):

" ... existing peak daytime ambient noise levels (Year 2006) ... ranged from 61 to **68** dBA (rather than 67 dBA); nighttime noise levels ranged from **47** dBA to **56** dBA (rather than 58 to 65 dBA)."

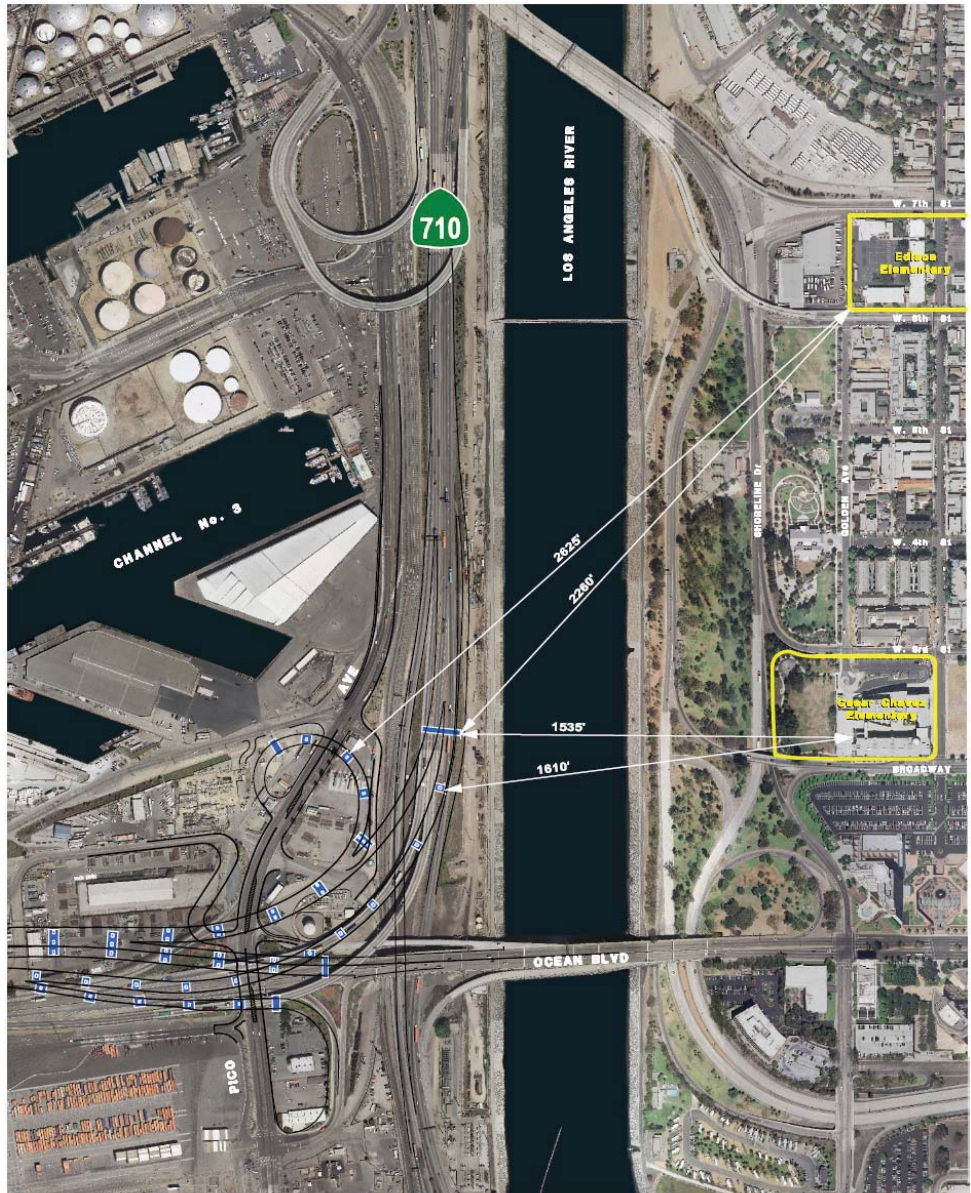
To re-establish current ambient conditions in the context of the Gerald Desmond Bridge environmental process, new ambient readings (over a 20-minute duration; one taken in the morning and another in the afternoon) were taken in the same vicinity as the previous Middle Harbor measurements. These new measurements differ from the previous ones in two key respects. First, the new measurements (taken in July 2009) were taken on the site of Cesar Chavez Elementary School, whereas the previous Middle Harbor measurements were taken on Golden Avenue immediately east of Cesar Chavez Park, between 4th and 5th Streets, which is five blocks north of the elementary school; therefore, the 2009 readings are more representative of conditions at the school, as opposed to the vicinity. Second, the 2009 readings are more representative of current ambient noise conditions in general, compared with conditions 4 years prior.

The measured ambient noise level at the school was averaged to be 62 dBA. It is appropriate to use averaged values to represent a given time period, not only because such averaging is mathematically acceptable, but also because the construction noise is also based upon averages at the sources onsite over the course of the day (Construction Site Noise Control Cost-Benefit Estimating Procedures, Construction Engineering Research Laboratory, 1978).

Please also see Noise Exhibit 01, which is attached to the response to LBUSD-7, below, for location of Cesar Chavez Elementary School in relation to the project location across the river.

Location	Date	Time	L_{eq} Noise Level, dBA
Cesar Chavez Elementary School	7/16/2009	11:29 – 11:49	59.3
	7/16/2009	13:12 – 13:32	64.0
Overall/Average			62

LBUSD-7: As explained in response to LBUSD-6, the more current baseline noise level at Cesar Chavez Elementary School was measured to be 62 dBA. As illustrated on the attached Noise Exhibit 01, Caesar Chavez Elementary School is located at distances of approximately 1,535 to 1,610 ft from the closest proposed pile-driving locations. Thomas Edison Elementary School, on the other hand, is located substantially farther away, between approximately 2,260 and 2,626 ft away from the pile-driving locations (see Noise Exhibit 01). As predicted and shown in Table 2.2.6-2 of the EIR/EA, the anticipated noise level at Cesar Chavez Elementary School associated with the pile-driving activity is estimated to be 60 dBA, which is below the ambient level; therefore, no impact is expected as a result of the construction activity. With Thomas Edison Elementary School being roughly another 700 to 1,000 ft farther away, the anticipated noise level there would be approximately 8 to 15 dB lower than the predicted 60 dBA at Caesar Chavez Elementary School, due to distance propagation attenuation and shielding provided by building structures; therefore, noise impacts at Thomas Edison Elementary School would be less than significant as well.



NOISE EXHIBIT 01

05 / 04 / 2010

LBUSD-8: Please see the response to LBUSD-7. Because Edison Elementary School is farther from the project site than Caesar Chavez Elementary School, the noise impacts at Thomas Edison Elementary School will be less than those at Caesar Chavez Elementary School, which would be less than significant.

LBUSD-9: Appendix C to the Middle Harbor document, at Table C-1, shows the "Estimated Usage Factor" for a pile driving hammer as 0.30. Footnote 2 to the table references Parsons, 2006, as the source of this assumption. Parsons, 2006, is the San Pedro Bay Ports Rail Study Update; Executive Summary; prepared for the Ports of Los Angeles and Long Beach. This study was done for a completely different type of project; the data and assumptions are not directly transferrable. The Estimated Usage Factor shown in Middle Harbor Appendix C, Table C-1, is associated with wharf construction. Construction of wharf facilities would logically require many more piles, spaced at fairly close intervals, to be installed; whereas, freeway structures require far fewer piles to support above-grade freeway columns. This could explain why the Middle Harbor usage factor is higher than that which is assumed for the Gerald Desmond Bridge Replacement Project. Secondly, the referenced Middle Harbor usage factor may be a maximum factor, not taking into account the actual usage over the course of the working day, whereas the Gerald Desmond analysis was done based upon engineering estimates of certain engineering activities organized on a typical daily basis.

The acoustical usage factor (20 percent for a pile driver) and referenced noise level (at 50 ft) used for purposes of the Gerald Desmond analysis is conservative and consistent with published data and measurements taken from other similar projects conducted previously by Parsons. For example, from the reference source Noise from Construction Equipment and Operations, Building Equipment, and Home Appliances (USEPA; 1971), the recommended acoustical usage factor for a pile driver is 4 percent; therefore, the 20 percent usage factor used in this analysis is conservative. The referenced noise level at 50 ft (97 dBA) used in the calculations is the same as that used in the Middle Harbor Redevelopment Project EIS/EIR; however, the overall noise levels for each construction activity would be different for each project, depending on the construction schedule; the extent of the construction activity; and various other operating parameters, such as the mixture of construction equipment fleet for the activity, hours of operation, and type and number of pieces of equipment utilized simultaneously, etc., as explained above. It is therefore not appropriate that assumptions used on one form of construction be arbitrarily applied to another; each project's unique construction requirements, processes, and schedule must be taken independently into account.

The 0.15 effective usage factor shown in Table 2.2.6-2 of the EIR/EA takes into account the number of pieces of equipment and the expected hours of operation. For this particular case, one pile driver operating 6 hours out of an 8-hour work day ($6/8 = 0.75$ usage factor) was given.

The following is a sample calculation:

$$\begin{aligned}
 \text{Effective usage factor} &= \text{number of pieces of equipment} \times \text{equipment usage factor} \\
 &\quad \times \text{acoustical usage factor} \\
 &= 1 \times (6/8) \times 0.20 \\
 &= 0.15
 \end{aligned}$$

LBUSD-10: According to the analysis conducted in the EIR/EA (see Section 2.2.6.3), no significant noise or vibration impacts are anticipated as a result of either construction or operation of the proposed project; therefore, mitigation measures are not required. However, in the interest of maintaining a noise environment that results in as little intrusion as practicable, the Port and Caltrans have committed to including additional noise control measures for pile-driving activities into the contract specifications, as described in Section 2.2.6.3 and

provided below. In addition, other noise-reduction practices will be incorporated into the construction specifications, as outlined in Section 2.2.6.3 of the Final EIR/EA.

- The Contractor will install temporary noise barriers between pile-driving activities and Cesar Chavez Elementary School at all pile-driving locations within 0.5-mi (2,640 ft) of the school; and
- Pile-driving activities will be limited to the hours of 7:00 a.m. to 7:00 p.m. on weekdays, between 9:00 a.m. and 6:00 p.m. on Saturdays, and prohibited anytime on Sundays and holidays, as prescribed by Section 8.80.202 of the LBMC.

LBUSD-11: We apologize for inadvertently omitting LBUSD from the distribution list. LBUSD has been added to the distribution list for all POLB projects, including the Gerald Desmond Bridge Replacement Project. In addition, as soon as it is available, the Port will provide LBUSD with the construction schedule for this project, and LBUSD will be given notice of all public meetings on this project.

LBUSD-12: Please see responses to LBUSD-2 through LBUSD-11 for specific responses to LBUSD concerns.

Responses to Comments from Community Groups

Long Beach Coalition For A Safe Environment, Dated 3/22/2010

CSE-1: The EIR/EA has been prepared in conformance with all applicable regulatory requirements and guidance pursuant to both NEPA and CEQA, as well as other related federal and state requirements that pertain to the proposed project and its potential impacts. In addition, the EIR/EA was prepared by Caltrans in the context of the NEPA delegation authority given to Caltrans under Section 6005 of SAFETEA-LU, following the procedures and guidance as directed by Caltrans' Standard Environmental Reference. Please see the detailed responses to CSE-2 through CSE-32 for the reasons the EIR/EA is not deficient, as alleged in this comment.

CSE-2: Consistent with CEQ Regulations and CEQA Guidelines Section 15124(b), the EIR/EA includes a discussion of the project purpose and need and objectives that are used to explain the underlying reasons why Caltrans and the Port are proposing the project. As stated in EIR/EA Sections 1.1.1 and 1.1.2, the overall purpose of the proposed project is to provide a bridge that will be structurally sound and seismically resistant, reduce approach grades, provide additional capacity to handle current and future car and truck traffic volumes, and provide vertical clearance that would afford safe passage of existing container ships and in the future for the new-generation larger vessels currently being constructed. It should be noted, as discussed in SCQAMD-2, that there are additional constraints other than vertical clearance that will continue to preclude vessels larger than those that can currently access the Cerritos Channel Terminals due to existing navigational constraints. Justification for the project purpose, based upon stated needs, is documented in Section 1.1.2.2.

In addition, all potentially significant impacts have been analyzed using widely accepted methodologies and have been thoroughly discussed and documented in the EIR/EA. Moreover, for all potentially significant impacts, all feasible mitigation measures have been imposed on the project to reduce the significant effects to the extent possible. For impacts that cannot be fully avoided, minimized, or mitigated, such impacts have been acknowledged (see EIR/EA Section 3.2). This approach fully satisfies the requirements of CEQA and NEPA.

Below are responses to the remaining detailed comments.

CSE-3: **a.** The Port of Long Beach is the correct lead agency under CEQA, and Caltrans is the correct lead agency under NEPA. Table 1-4 of the EIR/EA outlines all of the permits and approvals needed for the project. In accordance with the criteria for identifying the lead agency set forth in CEQA Guidelines Section 15051(a), the Port is the correct CEQA lead agency because it is the entity that will carry out the project. The project is located wholly within the boundaries of the City of Long Beach. The POLA is not funding or carrying out this project and has no discretionary authority over the project, so it cannot serve as the lead agency.

b. As discussed in EIR/EA Section 2.1.5 (beginning on page 2-74), the traffic study completed for the project considered all port-related (POLB and POLA) and regional traffic volumes in the impact analysis. Vehicles with origins and destinations within the San Pedro Bay Ports will use the proposed bridge, as will other users traversing through the area. The origins and destinations of traffic using the Bridge Replacement Alternatives are not relevant to the determination of the CEQA lead agency role.

c. Bridge traffic associated with both San Pedro Bay Ports has been included in the traffic analysis for the proposed project. For purposes of assessing the potential traffic impacts of the proposed project, it is neither necessary nor relevant to separately consider traffic from each port. While it is possible that POLA-related usage will exceed POLB-related usage, it has no bearing on the lead agency designation.

d. The traffic impact analysis in the EIR/EA accounted for all port-related (both POLA and POLB) and regional traffic impacts within the study area. Once potentially significant impacts were identified, it was the responsibility of the lead agencies to determine

whether feasible mitigation measures were available that could eliminate or reduce the significant impact. For all Build Alternatives considered in the EIR/EA, the lead agencies have identified the feasible mitigation measures and have included them in the project. See Section 2.1.5.4 of the EIR/EA for a description of the mitigation measures incorporated to reduce potentially significant traffic impacts.

CSE-4: a. Please see the response to CSE-3a.

b. Please see the response to CSE-3b.

c. Please see the response to CSE-3d.

CSE-5: The EIR/EA acknowledges that the bridge will carry a substantial amount of regional, non-Port related traffic, as well as Port-related traffic, and that growth in traffic will come from a variety of sources, both local and regional in context. Table 1-1 of the Draft EIR/EA shows that only 25 percent of traffic on the Gerald Desmond Bridge in year 2005 was trucks; the text on the same page of the Draft EIR/EA states that, in year 2030, 39 percent of bridge traffic is expected to be regional through traffic, meaning that it has neither an origin nor a destination on Terminal Island. The Gerald Desmond Bridge thus serves a wide range of travel needs. The comment provides no support for its assertion that the existing bridge was built to serve only the two categories of travelers identified in the comment. Given the bridge's location adjacent to the San Pedro Bay Ports, it is reasonable to assume that one of its primary functions would be to facilitate the movement of goods to and from the Ports. Likewise, the comment provides no support regarding the source of funds for construction of the existing bridge. The EIR/EA does not contain a discussion regarding the funds used in the 1960s to construct the existing bridge, as that information has no relevance to the potential environmental effects of the various Bridge Replacement Alternatives.

See also response to CSE-6.

CSE-6: a. With the advent of containerization of cargo at the POLB in 1962, improved shipping access to the inner terminals was necessary. Construction of the Gerald Desmond Bridge provided a permanent structure that improved shipping access, navigational safety, and access for Port-related and regional traffic. The Gerald Desmond Bridge was built and paid for by the POLB in 1968, at a cost of \$14 million to replace a pontoon bridge that previously provided access for port-related and regional traffic from the City of Long Beach to Terminal Island. In 1982, Caltrans identified the Port-owned portion of SR 710 and Ocean Boulevard as a future extension of I-710 and formalized the intent to adopt the project area into the SHS in the California Streets and Highways Code. Ship calls and cargo volumes continued to increase and, in 1989, the Gerald Desmond Bridge was connected via the existing ramps to SR 710. Partial funding for the ramp connections to SR 710 was provided by FHWA.

The Gerald Desmond Bridge is currently the Gateway to 10 percent of all waterborne goods entering the U.S. and no longer provides sufficient roadway capacity to meet forecasted increases in Port-related or regional traffic volumes within the project area and is not sufficient to meet navigational requirements of future generation vessels. As noted in Section 2.1.2.3 of the EIR/EA, increasing the vertical clearance of the bridge would provide sufficient air draft to allow future (larger) generation vessels into the Back Channel, but until additional navigational improvements are made by the Port, such passage would not be possible. Moreover, as is also noted in the EIR/EA, neither Pier A nor Pier S is projected to attract the larger future vessels. Thus, the original purpose of the bridge was about improving movement of people and goods, the same as the proposed new bridge will do in the future. As noted above, Table 1-1 of the Draft EIR/EA shows that only 25 percent of traffic on the Gerald Desmond Bridge in year 2005 was trucks; the text on the same page of the Draft EIR/EA states that, in year 2030, 39 percent of bridge traffic is expected to be regional through traffic, meaning that it has neither an origin nor a destination in the port area. The Gerald Desmond Bridge thus serves a wide range of travel needs. Furthermore, Ocean Boulevard is designated as Overweight Vehicle Special Permit Route by the City of Long Beach, Department of

Public Works (see map at <http://www.longbeach.gov/pw/traffic/projects/ovs.asp>) and as designated as a truck route in the City of Long Beach General Plan from the western City limit on Terminal Island to Magnolia Street.

b. The existing Gerald Desmond Bridge was constructed by and is owned by the POLB. The original construction cost was \$14 million and came from Port revenues. Port funds are generated from Port leasing and other activities, and they do not come from the City's general fund (see also CSE-6c below).

c. As discussed in EIR/EA Chapter 1 Section 1.5, under the Bridge Replacement Alternatives, the bridge and Ocean Boulevard would become part of SR 710 and would operate as a freeway facility with controlled access. The improvements between the existing SR 710 and SR 47, including the bridge, would be transferred to Caltrans by easement following route adoption and execution of a freeway agreement.

Funding for the project will come from POLB revenues and state, federal, and possibly private sources. POLB continues to seek funding from all available sources for construction of one of the Bridge Replacement Alternatives. Port revenues for the project are generated from terminal leasing and other operations within the POLB; the Port does not receive funding from the City general fund. Thus, the Port contribution for the project does come directly from Port tenants and indirectly from importers and exporters who pay to move goods through the Port to/from their facilities.

CSE-7:

a. The Gerald Desmond Bridge is one of the major entry and exit points into the local, regional, statewide, and national goods movement network. Neither Caltrans nor the Port has the authority to restrict access to the bridge. It is the responsibility of the California Highway Patrol to enforce the usage restrictions imposed by the CVC on state or federal highways and local law enforcement agencies on other public roadways. In addition, the Port cannot prohibit trucks from using the bridge because it is a designated truck route in the City's General Plan Circulation Element and part of the City/Port Overweight Vehicle Special Permit Route; it is also a National Highway System Intermodal Connector Route and, upon the anticipated relinquishment of the bridge to Caltrans, it will become part of the Interstate Highway System. It should be noted that the Port has implemented measures to alleviate traffic congestion on the Bridge during peak hours, such as PierPass. This program has successfully diverted 40 percent of Port traffic to off-peak hours. Additionally, if trucks were prohibited from using the bridge, as suggested by the comment, there would not be adequate capacity leaving Terminal Island on the Vincent Thomas and Schuyler Heim bridges to handle the diverted traffic without substantial delays and congestion. In addition, trucks diverted from the bridge would likely use alternative parallel roadways on local neighborhood streets, thereby transferring impacts to city streets and local neighborhoods, which would not be acceptable to the City, the Port, or the affected communities.

b. The comment provides no support for the assertion that "old trucks" present significant traffic and safety problems on the Gerald Desmond Bridge. Even if such support were available, regulation of motor vehicles using the highway system and local roadways is within the jurisdiction of the Department of Motor Vehicles (DMV), not Caltrans or the Port; however, through implementation of the Ports' Clean Trucks Program, all trucks serving the Port must meet 2007 emission standards. In 2012, trucks serving both Ports will be required to meet 2010 emission standards. Thus, the Clean Trucks Program will result in a newer, cleaner truck fleet operating within the project area.

c. Neither the Port nor Caltrans maintains statistics quantifying vehicle "breakdowns" by type of vehicle, and no such statistics have been located. Moreover, the comment provides no support for its allegation that trucks are the "cause of breakdowns" on the bridge. One of the objectives of the project is to provide a safer bridge so that a breakdown of any vehicle, new or old, passenger car or truck, will not cause delays and congestion that result from breakdowns on the current bridge, which has no shoulders for such emergency situations.

CSE-8:

Please see the responses to CSE-7a, CSE -7b, and CSE-7c.

- CSE-9:**
- a. The need to raise and/or relocate the SCE transmission lines is disclosed in EIR/EA Section 2.1.4.2. At this time, the cost to raise and/or relocate the transmission lines cannot be determined until further study is completed by SCE and additional coordination with the POLB occurs during the final design phase. The allocation of the costs is an economic issue that is beyond the scope of this EIR/EA pursuant to CEQA Guideline 15131(a). Allocation of costs to relocate and/or raise the transmission lines will be completed in accordance with SCE, CPUC, and Port policy.
 - b. Costs associated with raising and/or relocating the transmission lines cannot be determined until further study is completed by SCE and additional coordination with the POLB during the final design phase is completed. See response to CSE-9a.
 - c. As stated in the response to CSE-9a, it has not been determined how the cost for raising and/or relocating the transmission lines will be allocated. Should SCE be responsible for all or a portion of the cost, it would appear likely that such cost would be accommodated by an existing SCE capital improvement account. Given the magnitude of the SCE operation in the southern California region, it appears unlikely that the cost of relocating the affected transmission lines, while substantial, would be of such significance as to cause a change in the rates charged to SCE customers. SCE has not indicated the need for such a change in its comments on the EIR/EA.
 - d. See response to CSE-6 for a discussion regarding Port revenues that may be used to fund construction of any of the Build Alternatives.

Please also see the responses to SCE-1 through SCE-3.

CSE-10: Please see the responses to CSE-9a, CSE-9b, CSE-9c, and CSE-9d.

CSE-11: a. This comment is factually inaccurate. The existing bridge was seismically upgraded in 1995, and the Port has continued to maintain the bridge as necessary. For example, in the last 3 years, the Port has spent approximately \$1.6 million on maintenance of the Gerald Desmond Bridge. The work included:

- Deck seal 300,000 square feet;
- Replace cable restraint plates (70);
- Repair fingers on expansion joints;
- Install joint seals (30) to prevent stormwater from reaching deck supports;
- Repair 3 overhead beams by heat straightening that were damaged by high trucks;
- Restriping;
- Paint lower chords; and
- Fix several hundred potholes. Since deck sealing, there have not been any new potholes.

In addition, reports on the bridge's condition were prepared in 2002 (*Load Rating Report*) and 2005 (*Inspection Report*), both of which indicated conditions requiring replacement of either certain structural components or the entire bridge within the near future. Accordingly, a study was initiated in 2002 to consider possible actions. In April 2002, the Port prepared a Conceptual Study to determine an "order of magnitude" cost for replacing the existing bridge. Project studies were initiated in early 2002 to develop viable alternatives for a Project Study Report (PSR) for the project.

Due to potential funding constraints, as well as the potential for reduced impacts to the environment, the Port included in the EIR/EA the Rehabilitation Alternative, which would include a full seismic upgrade of the Gerald Desmond Bridge, as an alternative to replacement. As described in Section 1.6 of the EIR/EA, the Rehabilitation Alternative would only postpone for a time the need to replace the bridge; based on a lifecycle cost and net present value analysis, rehabilitation would only extend the service life for

another 30 years. In addition, the Rehabilitation Alternative would not satisfy one important project need, namely accommodating expected future traffic.

b. This comment is factually inaccurate. The POLB has applied for “stimulus funds” for the bridge but has been unsuccessful in its applications. For example, the POLB application for Transportation Investment Generating Economic Recovery (TIGER) funds, which are discretionary grants under the American Recovery and Reinvestment Act (ARRA), for the Gerald Desmond Bridge Replacement Project was unsuccessful at least in part because ARRA stimulus funding for transportation projects is available only for projects that can be completed within 3 years and that are located in economically distressed areas. This project is not within an economically distressed area and could not be completed within 3 years (<http://www.fhwa.dot.gov/economicrecovery/guidancedistressed.htm>). Meeting these criteria for any of the proposed Build Alternatives was not possible; however, the Port will continue to pursue all available federal and state funding sources for the project.

c. See responses to CSE-5, CSE-6, and CSE-7.

d. See responses to CSE-5, CSE-6, and CSE-7.

e. The 100-year design life of the replacement bridge makes it necessary to consider likely developments in the vessel fleet that may occur in the future. As noted in EIR/EA Section 2.1.6.2, the next generation of vessels likely will not increase their air draft due to limitations in the on-deck stack heights of containers and major bridge clearances around the world; however, even larger ships are being considered for the future (upwards of 12,500 container capacity), which would increase air draft to 180 ft, and even larger vessels (18,000 container capacity) also are being discussed. It is, therefore, prudent to provide for such potential future conditions because they may come to fruition within the bridge's design life. The proposed replacement bridge would have an air draft of 200 ft, thereby allowing for potential increases in vessel size. It should be noted, however, that channel depth issues currently limit such larger ships from calling at the Port; therefore, improvements to the Port's channels would also be needed at some point in the future before such larger vessels could proceed through the Back Channel.

CSE-12:

a. A detailed seismic study will be performed as part of the final design activities for the selected alternative. Such detailed studies would be duplicative and, therefore, wasteful if done for several alternatives during the preliminary design phase of project development.

b. The Caltrans-required Project Report documents the engineering development of the project to this point in time. The Project Report was prepared by Parsons/HNTB professional engineers, which includes engineers with expertise in every aspect of the project design, including seismic design. The Project Report was reviewed and approved by Caltrans professional engineers, who also have expertise in every aspect of the project design, including seismic design. In addition, professional engineering opinions regarding seismic performance of the proposed Build Alternatives have been considered and incorporated into the preliminary designs of all of the Build Alternatives. This includes the opinions of Caltrans, FHWA, the project Technical Advisory Panel (TAP) and the following professional engineering firms: Parsons and HNTB. The TAP includes five experts from USC, UCSD, TYLIN, McNary Bergeron, and John Clark Consulting Engineers. During final design, the plans and specifications for the selected alternative will undergo rigorous review by all members of the PDT to ensure that the project meets or exceeds all federal and state seismic design requirements.

CSE-13:

a. Please see response to CSE-12a.

b. Please see response to CSE-12b.

c. The purpose of the EIR/EA is to disclose the potentially significant environmental effects of the Build Alternatives. The Port and Caltrans believe that all necessary studies have been completed to evaluate and disclose the potential effects of the project on the environment in accordance with both CEQA and NEPA and that no additional seismic studies are required at this time to evaluate environmental effects. Additional detailed

seismic engineering studies will be conducted during the final design phase of the project, such that all applicable and current seismic safety requirements are incorporated into the project. For purposes of the environmental document, however, the level of information presented in the EIR/EA (see Section 2.2.2) is sufficient to determine whether seismic impacts would occur that would affect the proposed project and also indicate the differences among the alternatives, if any, as related to that factor. As described in EIR/EA Section 2.2.2, seismic design standards will be imposed upon the project. No additional seismic studies would be required for purposes of the EIR/EA, nor is recirculation of the document required. Such studies would only be warranted if the proposed project is approved. Pursuant to CEQA Guideline Section 15004, lead agencies are encouraged to complete the CEQA review prior to preparation of final design and construction documents.

CSE-14:

a. The EIR/EA considers and evaluates a reasonable range of feasible project alternatives. For each of the Build Alternatives, forecasted traffic volumes are provided and were considered in the traffic impact study consistent with CEQA and NEPA requirements. The existing Gerald Desmond Bridge is and will continue to be a major gateway to the local, regional, state, and interstate goods movement network. Restricting or prohibiting truck use of the bridge is likely to divert traffic to local streets and neighborhoods, which would increase the environmental impacts associated with truck traffic in the project area. In accordance with CEQA Guidelines Section 15126.6(a), a truck limitation on the bridge was not considered a reasonable alternative because, among other reasons, it would increase, rather than decrease or lessen the significant effects of the proposed project. See also responses to CSE-7 and CSE-8.

b. Please see response to CSE-14a.

c. The San Pedro Bay Ports have been and are pursuing an aggressive program to shift container cargo from trucks to rail using on-dock and near-dock rail facilities; however, a certain amount of cargo coming into the Ports is destined locally to accommodate direct demand in southern California. This cargo will continue to be carried by trucks to local destinations that cannot be accessed by rail. The travel demand modeling that was done for purposes of the traffic analysis in the EIR/EA is based on regional projections that include projections related to the amount of cargo forecasted to go by rail and truck; therefore, the suggested "option" described in the comment already is included as part of the analyses in the EIR/EA.

d. Construction of a new system to facilitate goods movement to the near- and/or off-dock railyards, such as commenter's suggested Zero Emission Electric MagLev Train System by American MagLev, is not a feasible project alternative. The bridge currently carries 25 percent of port truck traffic, which includes a mix of trucks destined for intermodal railyards, as well as warehouses, distribution centers, factories, etc. throughout the region. The remaining traffic consists of commuters, domestic delivery trucks, transit buses, visitors, etc. Construction of a new goods movement system that would connect the marine terminals to nearby intermodal railyards would only address less than 10 percent of the traffic congestion on the bridge. Furthermore, such an alternative would not address the existing safety concerns, such as the lack of emergency shoulders, the lane drop at the crest of the bridge, the seismic condition, or the lack of air draft that has resulted in ships clearing the bridge with just a few feet to spare.

Although a Zero Emission Container Mover System (ZECMS) is not a feasible project alternative, it is being investigated as a possible option for transporting containers between the port marine terminals and the near- and/or off-dock railyards. The ports of Long Beach and Los Angeles have set a goal to minimize combustion emissions resulting from port operations. To date, their clean air action initiatives have led to reduced emissions from ships, harbor craft, on-terminal handling equipment, and port drayage diesel trucks. In addition, both ports have jointly invested more than \$1 million to date to identify promising zero-emission container conveyance technologies and investigate their readiness for commercial deployment by issuing a Request for Concepts

and Solutions (RFCS) for a ZECMS. The purpose of the RFCS was to determine the practicality of available systems in a demanding port environment, as well as to determine the financial feasibility of a consortium deploying a complete ZECMS. It was envisioned that the ports could develop and release a Request for Proposals (RFP) based on one or more promising concept(s) at the conclusion of the RFCS process. This RFP would contain detailed requirements for the design, construction, and long-term operation and maintenance of a ZECMS, and the issuance of the RFP would be administered by the ACTA on behalf of both ports.

The ports of Long Beach and Los Angeles, and ACTA are currently evaluating concept documents submitted by American Maglev, Bombardier, Flight Rail Corp., Freight Shuttle Partners, Innovative Transportation Systems Corp. in partnership with General Atomics, Magna Force, Inc., and Tetra Tech, Inc. The findings will be released in summer 2010.

- CSE-15:**
- a. Please see response to CSE-14a.
 - b. Please see response to CSE-14d.

With regard to the comment that American Maglev Company has volunteered to build the test facility, American Maglev submitted an unsolicited proposal to the POLB and POLA in early 2008. While the proposer claimed it would build this facility at its own expense, it also asked the Ports to grant it the use of land for the train alignment connecting Pier A and ICTF. A preliminary review by Port staff on the alignment proposed by American Maglev revealed that a significant number of parcels are not owned by the Port. The unsolicited proposal did not assess the cost of land acquisition, permitting process, and potential environmental impact on sensitive uses along its proposed alignment. The financial plan included in the unsolicited proposal had not been fully audited by any financial institutions. Additionally, the American Maglev project does not meet the project purpose and need and does not address any of the project objectives discussed in EIR/EA Sections 1.1.1 and 1.1.2. Although the Port is committed to a pollution-free cargo-moving system as described in CSE-14d, evaluation or implementation is not within the scope of the Gerald Desmond Bridge Replacement Project and would not reduce the magnitude of any significant and unavoidable impact; therefore, discussion of the proposal within the environmental document is not required.

- c. Please see response to CSE-15b.

Additionally, the commenter is incorrect. The Port has not refused to grant a 20-ft ROW to build a demonstration MagLev project at no cost to the public. The Port is in the process of evaluating seven proposals received through the ZECMS RFCS (see response to CSE-14d). The results will be presented in summer 2010. No decisions, including a decision of whether to grant ROW for a demonstration project, have been made by the Board of Harbor Commissioners as of this date.

- d. The Port is not aware of any such offer by a Long Beach marine terminal operator to place 400 containers per day onto a MagLev Train; however, assuming that the 400 containers referenced in the comment were to use the demonstration project described in CSE-15b, based on the location of Pier A in relation to the ICTF and associated transportation routes shipping, few if any of these eliminated trips would translate into fewer trips on the bridge. The Port is actively pursuing alternatives and technologies that will reduce Port-related truck volumes; however, implementation of alternative goods movement technology at the required scale to substantially reduce truck trips will likely be employed after the design horizon year (2030) for the proposed project. Additionally, the comment fails to consider that decreasing truck trips through alternative goods movement technology is governed not only by the destination of the goods, but how the goods are shipped.

At present, approximately 60 percent of the containerized goods coming into the Ports are destined for points east of the Rocky Mountains, including transloaded cargo, whereas the balance are local goods destined for the local region and elsewhere in the Southwest. Local goods are not transported via rail for financial and operational reasons.

Upgrading the roadways, including the proposed project, within and connecting to the Port is essential to local regional goods movement. An alternative goods movement technology at an appropriate scale to reduce truck trips to off-dock rail yards or to local destinations that would change the financial or operational paradigm, making local goods movement by truck prohibitive, has not yet been identified. The American Maglev proposal would have a limited impact by reducing truck trips between Pier A and one near-dock rail yard. The American Maglev proposal would have no effect on reducing truck trips within the project area or use of trucks in transporting the 40 percent of goods within the local region.

- CSE-16:**
- a. Please see responses to CSE-7 and CSE-14.
 - b. Please see responses to CSE-14d and CSE-15.
 - c. Please see response to CSE-14d and CSE-15b.
- CSE-17:**
- a. Please see responses to CSE-7, CSE-14, and CSE-15.
 - b. Please see responses to CSE-14d and CSE-15.
 - c. Please see responses to CSE-14d and CSE-15.
 - d. Please see response to CSE-15b.
- CSE-18:**
- a. As described in Section 1.7 (page 1-28) in the EIR/EA, the Toll-Operation Alternative was considered but not carried forward for analysis. Potential environmental effects of the Toll-Operation Alternative are discussed in Section 1.7.1. This alternative was dropped from further consideration because it would have resulted in substantially more environmental and social impacts associated with traffic diversion when compared to the three non-tolling build alternatives evaluated in the EIR/EA.
 - b. Please see response to CSE-18a.
 - c. Please see responses to CSE-5, CSE-6, and CSE-20.
 - d. Please see responses to CSE-5 and CSE-6.
 - e. Please see responses to CSE-5 and CSE-6.
- CSE-19:**
- a. Please see response to CSE-18a.
 - b. Please see response to CSE-18a.
 - c. Please see responses to CSE-5 and CSE-6.
 - d. Please see responses to CSE-5 and CSE-6.
 - e. Please see responses to CSE-5 and CSE-6.
- CSE-20:**
- The information noted in the comment is clearly stated in EIR/EA Section 2.1.2 Growth Inducement (page 2-16). The quoted information in the comment comes from the section discussing "Land-Side Indirect Growth Inducement Potential." This section discusses whether the congestion relief benefits associated with Bridge Replacement Alternatives would result in indirect growth inducement through diversion of cargo to or from POLB/POLA.
- In January 2008, POLB and POLA approved tariff items that established an Infrastructure Cargo Fee (ICF) of \$15 per TEU, effective January 1, 2009. On December 15, 2008, however, due to the severe economic recession that resulted in significant declines in cargo volumes through the ports, the Board postponed the collection of that fee for 6 months to July 1, 2009, and reduced the fee to \$6 per TEU due to lack of project readiness. On May 4, 2009, the economic recession continued, so the Board again postponed the collection of the fee, for 1-year, until July 1, 2010. Recognizing the nation's economic downturn continued to persist; on April 20, 2010, the Board of Harbor Commissioners approved the recommendation of the Trade Relations and Port Operations Committee to further postpone collection of the fee until January 1, 2012. Unless additional Board action is taken, the collection of the ICF tariff will commence on

January 1, 2012. The Gerald Desmond Bridge Replacement project is one of the projects identified to receive funding from the ICF when implemented.

a. As stated above, the source of the funding for this project is beyond the scope of this EIR/EA. Nonetheless, the following information is provided to the commenter. Funding for construction of the selected alternative could come from POLB revenues, state, regional, and federal funds, and possibly private funding. Additionally, if implemented, the ICF on containerized cargo will supplement funding for critical highway and rail projects within the San Pedro Bay area, including the Gerald Desmond Bridge Replacement Project. The Port will use the ICF revenue to match funds from Proposition 1B and to help pay for major port-related transportation infrastructure and air quality improvements. The ICF funds could also help leverage other local, state, and federal monies, as necessary.

Funding sources currently programmed for the project include the following:

- Federal Highway Bridge Program: \$10 million (prior to FY 2010)
- SAFETEA-LU: \$90 million
- Federal Appropriation: \$6.1 million (prior to FY 2009)
- Federal Highway Bridge Program: \$201.9 million (Programmed through “Advanced Construction” Authority)
- Prop 1B TCIF: \$250.0 million (SHOPP through GARVEE)
- Los Angeles County Call for Projects: \$28.6 million
- Local Funds: \$112.5 million (estimated at 10 percent of total project cost)

f. (sic) The studies mentioned in the comment are described in the EIR/EA at Section 2.1.2.3. In recognition of the study results, the Port adopted the ICF that is described in response to CSE-20a. When implemented, the ICF will apply to each loaded import or export container moved through the ports’ terminals by truck or rail. While it may be true that the ICF could fully fund the project, doing so would be counter to the intent of the ICF. Not only would it redirect ICF allocations from other important rail projects that will increase rail usage and decrease truck drayage, but it would also contradict the adopted ICF tariff language that cargo interests shall not pay more than their fair share of the project. See the introduction to the response to CSE-20 for a discussion of the status of the ICF. Also see responses to CSE-5 and CSE-6 regarding bridge usage.

b. The purpose of the EIR/EA is to evaluate the potentially significant environmental impacts of the proposed Build Alternatives. Because there is no evidence of environmental impacts resulting from any of the identified sources of possible funding for any of the alternatives, the EIR/EA does not contain a recommendation regarding a container fee. See also the discussion in the introduction to the response to CSE-20.

c. The Gerald Desmond Bridge Replacement Project is considered to be of State and national importance. Both the state and federal governments have identified the project as critical for mobility for all motorists, as demonstrated by its designation as a high-priority project recommended for Proposition 1B bond funding; by its inclusion in the State of California Business, Transportation, & Housing Agency/Cal EPA Goods Movement Action Plan; its designation as a “Project of National & Regional Significance” in the federal SAFETEA-LU by Congress; and as a regionally significant project by Metro. As discussed in CSE-5, 39 percent of the forecast traffic volumes using the bridge will be regional traffic, with neither an origin nor destination in the Ports. Contrary to the allegation in the comment, Caltrans and the Port are carrying out their responsibilities by proposing to improve bridge safety and reliability for all users of the bridge.

CSE-21:

- a.** Please see response to CSE-20.
- b.** Please see response to CSE-20.
- d. (sic)** Please see the response to comment 20b, above.

c. Caltrans is a division for the State's Business, Transportation, and Housing Agency and is responsible for maintaining, construction, and operating the SHS and all other duties assigned to the agency pursuant to Sections 14030-14053 of the California Government Code. The POLB is a department of the City of Long Beach charged with managing the Harbor District in accordance with Article XII of the Charter of the City of Long Beach, the tidelands grant, and all applicable local, state, and federal laws.

CSE-22:

a. The comment asserts "that there is an abundant [sic] of Port data that will clearly disclose that there has always been increased growth when there have been transportation infrastructure improvements". The comment does not, however, identify or provide the data that would allow quantification of the growth-related impacts or otherwise reduce the level of speculation described in the EIR/EA. The potential for growth inducement is discussed in EIR/EA Section 2.1.2. The potential for the bridge to result in additional growth is acknowledged as an indirect effect (under Land-side Indirect Growth Inducement); however, the nature and extent of such indirect growth and, therefore, the precise impacts of that growth, cannot be identified or quantified at this time. Therefore, in accordance with CEQA Guidelines Section 15145, the lead agency determined that any analysis beyond what is included in the EIR/EA would be too speculative to provide meaningful information.

b. Expert consultant assistance was extensively used in the preparation of the EIR/EA. See Chapter 5 of the EIR/EA for the list of experts who assisted in the preparation of the document.

As is noted in EIR/EA Section 2.1.2.3 and the response to comment SCAQMD-2, it is acknowledged that there is some potential for growth to be affected indirectly by improved project-related transportation conditions that reduce congestion. This type of growth is highly speculative and extremely difficult to quantify in an urban environment that is already developed. The future traffic projections used for purposes of the traffic impact analysis account, in part, for this added increment of growth, because they are based upon future projections of regional population and employment through 2030, which includes Port-related trips at build-out. It should also be noted that, when compared with the overwhelming economic forces that occur on a global scale, the transportation-related effects would be very small in comparison with overall traffic movement. For the reasons stated above, it is determined that identification of the proposed project's potential indirect effects on growth and quantifying the related environmental effects would be speculative.

CSE-23:

a. Please see response to CSE-22.

b. A detailed analysis of the potential for growth inducement is provided in Section 2.1.2. The project is acknowledged to potentially indirectly affect growth, although the quantification of such growth is considered speculative. Accordingly, the second-order environmental consequences resulting from an additional increment of growth would also be too speculative to quantify; however, regional travel projections, which are based on adopted socioeconomic growth forecasts, have been used for purposes of determining the likely impacts resulting from increased traffic handling made possible by the bridge replacement. In that sense, the effects associated with indirect growth are accounted for. All other potentially significant effects of the project have been fully disclosed in the EIR/EA.

c. Although the comment requests additional mitigation to address negative environmental, public health, public safety, and socioeconomic impacts, no additional measures were recommended by the commenter for consideration. For all potentially significant impacts of the proposed project, all feasible mitigation measures have been identified and incorporated to reduce, minimize, or lessen the identified impact. See Table ES-1 of the EIR/EA for a summary of the significant impacts of the project and the mitigation measures imposed to reduce those impacts. See Final EIR/EA Sections 2.1.5, 2.2.3, 2.2.4, 2.2.5, 2.3, and Chapter 3 for complete analysis of the related topics. Chapter 3 also includes the final contribution amounts to the Port's grant programs and

methodology utilized to calculate the contributions as described in CEQA (AQ)-1 and CEQA (GHG)-1.

CSE-24: a. The EIR/EA has been prepared in accordance with requirements of both CEQA and NEPA. Final EIR/EA Section 2.1.2 (Growth Inducement) contains a detailed, thorough analysis of growth inducement and, based on the evidence set forth in Section 2.1.2.4 and the cited studies, concludes that no mitigation measures are required. In addition, the EIR/EA discloses and considers all known potential project effects on the environment and has proposed avoidance, minimization, and/or all reasonable and feasible mitigation measures to avoid, minimize, or mitigate project-related effects to the maximum extent practicable. For the reasons set forth in response to CFASE comments, Caltrans and the Port do not believe that CFASE has identified any deficiencies in the EIR/EA.

b. Please see response to CSE-24a.

CSE-25: Please see response to CSE-24. In addition, Caltrans and the Port believe that the EIR/EA contains a reasonable range of potentially feasible project alternatives and includes all feasible mitigation measures to reduce the significant effects of the project.

CSE-26: a. Regarding the appropriateness of study areas, each of the impact categories (e.g., air quality and noise) discussed in the environmental document were considered individually, and study areas were identified for each category based upon a due consideration of the extent to which impacts of the proposed project would occur (see also NRDC-3 below). The determination of appropriate study areas is described in each of the technical sections in Chapter 2 of the EIR/EA. Appropriate study areas vary by subject based upon the area of influence or extent of the expected effects. The study areas identified in the Draft EIR/EA are based on the above considerations, along with expert consultation and guidance from various agencies (e.g., SCAQMD); therefore, the scope of the study areas are not arbitrary. Community impacts, which encompass one of the larger study areas, are discussed in EIR/EA Section 2.1.3. As is noted in this section, traffic impacts were taken as the impact category likely to have the broadest geographic effect. Using this to define the study area for community impacts, an area encompassing 11 surrounding census tracts was defined. This area includes portions of both the City of Long Beach and the Wilmington area of the City of Los Angeles. The geographic area circumscribed by this definition of study extends beyond 0.75-mi from the project site. The comment indicates that entire communities and cities will be impacted, but it fails to provide any information that would support the comment. The commenter has not demonstrated that any consideration of modified study areas is called for.

b. The proposed project is a transportation infrastructure project, and completion of either of the Bridge Replacement Alternatives would not directly generate any additional new trips. As discussed in Sections 2.1.5 and 2.1.3.3.3, operation of the Bridge Replacement Alternatives is expected to result in some local redistribution of traffic as Port and regional traffic modify travel paths to take advantage of the congestion-relief benefits of either of the Bridge Replacement Alternatives. This redistribution would most likely occur from parallel roadways north of the Ports, such as Anaheim Street, PCH, and Willow Street. Some trips that would otherwise seek local street routes may use the new bridge, thereby acting to improve local circulation and reduce port-related traffic in the referenced communities. Port transportation demand is generated at the terminal, and completion of any Build Alternative would have no effect on the origin of goods that pass through the Port, the destination of those goods, or demand for goods. Additionally, due to other navigational constraints within the Back Channel, larger ships referenced in the comment still would not be able to transit the back channel (see response to similar comment CSE-11).

It is unclear what communities the commenter is referring to as "transportation corridor communities" and "warehouse distribution center communities," and the commenter has not provided evidence as to what impacts would be expected to occur on those communities beyond those identified in the EIR/EA. Careful thought was put to the selection of each study area, such that potential impacts resulting from the proposed

project would be captured and also that potentially affected persons and locations would also be identified (see also NRDC-3 below).

CSE-27:

1. The comment requests that the Final EIR/EA include "...all of Wilmington, Carson, North San Pedro, and all of the City of Long Beach Transportation Corridor Communities and Warehouse Distribution Center Communities." However, the comment does not provide any reasons for considering additional areas than what were included in the EIR/EA. As is noted in EIR/EA Section 2.1.3.1.2, the entire document was reviewed to determine the broadest area subject to potential impacts to define the community impacts study area. Traffic was determined to be that area, with the affected area being determined on the basis of a change in travel amounting to 50 or more peak-hour trips (City of Long Beach traffic impact analysis guidelines). Using that as a basis, the community impact study area was defined to be the area shown in the dotted line on Figure 2.1.3-1, but it was enlarged to encompass 11 surrounding census tracts. This area includes a portion of the POLA, a portion of the City of Los Angeles Wilmington community, and the southwesternmost portion of the City of Long Beach, extending to PCH on the north. This area also includes the southernmost reach of SR 710. The study area had a year 2000 population estimate of 31,000. Community impacts (as discussed in Section 2.1.3.1.3) were evaluated across four categories: community facilities and services, recreation, population, and housing. The evaluation concluded that no adverse effects would occur to communities within that study area.

The commenter references "transportation corridor communities" and "warehouse distribution center communities" but provides no explanation of what communities are included in the terms. A search of the City of Long Beach General Plan was conducted for the terms "transportation corridor communities" and "warehouse distribution center communities," and no information was found; therefore, it is unclear to what area of geography the commenter is referring. The effects of the proposed project are judged to not extend beyond the area described above and shown in Figure 2.1.3-1 (see also NRDC-3).

2. The comment suggests that the commenter may be considering the project as though it were a cargo terminal expansion improvement project that directly resulted in additional truck or train trips, which trips may have impacts that could extend some distance from the terminal project; however, the project is a bridge replacement project that does not itself generate any new trips. Although the project does provide additional roadway capacity within the study area, it will have no effect on the demand for goods or on the origin or destination of the goods that pass through the Port. The unidentified communities referred in the comment as being within a 50-mi radius of the proposed project would be well out of the range of potential effects associated with this project, as described in the response to comment CSE-27 (1.) above; therefore, they are not required to be evaluated in the document.

CSE-28:

a. The lead federal agency environmental justice policies and procedures were applied in preparing the environmental justice analysis. Caltrans, in accordance with FHWA environmental justice policy and procedure, oversaw and assisted in the preparation of the environmental justice analysis, which is consistent with FHWA Region 9 (California) Guidance, "Addressing Environmental Justice in the Environmental Assessment (EA)/Impact Statement." Caltrans is experienced in completing environmental justice analyses for transportation projects and has environmental justice experts both in the District and at Headquarters. The environmental justice analysis was completed in accordance with DOT and FHWA policy and is consistent with the requirements of EO 12898. Additionally, Caltrans, through its commitment to its Title VI policy and consistent with the Executive Order, ensures that no person in the State of California shall, on the grounds of race, color, national origin, sex, disability, or age, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity it administers.

Caltrans, both as a state agency and as a department whose funding is substantially tied to federal programs, has long been a leader in understanding environmental justice,

since the inception of President Clinton's EO 12898. Caltrans does have special advocates in both Planning and Environmental Divisions. This includes a dedicated full-time environmental justice senior-level statewide coordinator in HQ Division of Planning since 2001, and a designated staff representative in the Division of Environmental Analysis since 1997. In recognizing the importance of local expertise, Caltrans HQ designated an environmental justice coordinator in each of the 12 districts' planning units in 2004. Furthermore, as Environmental Justice is largely encompassed within Title VI of the Civil Rights Act, the Caltrans Headquarters Division of Civil Rights works closely with its Planning and Environmental staff, as well as the other programs, to not only prohibit discrimination, but actively promote fair treatment and the meaningful involvement of people of all races, cultures, and income levels, including minority and low-income populations. Caltrans was the first California state agency to issue its own Director's Policy on Environmental Justice (2001) and in that same year began an Environmental Justice Grant Program that distributed \$3 million in each 2-year cycle. It has also developed and distributed guidance products for both planners and the public, including *Environmental Justice in Transportation Planning and Investments* (2003) and *Community Primer on Environmental Justice and Transportation Planning* (2009).

b. Other than the Port's consultant, Parsons, no other consulting firm or outside organization was requested to provide advice or guidance on Environmental Justice or analysis for purposes of considering potential project effects on Environmental Justice populations. Caltrans HQ and Districts are experts in analyzing and determining Environmental Justice impacts in accordance with FHWA policy and guidance. According to the independent *California Planning and Development Report*, "Caltrans might be farther along in actually carrying out its Environmental Justice policies than any other state agency (April 2003)." Caltrans has conducted environmental justice analyses as part of its environmental compliance process for well over a decade; in fact, Caltrans Headquarters conducts a 2-day training workshop for its environmental and transportation planners specifically on Community Impact Assessment, which includes a 4-hour module on the topic of Environmental Justice, including in-house exercises. HQ staff are national experts and have served on not only the California's Governor's Office of Planning and Research's Environmental Justice Task Force, but were active members of two National Academies Transportation Research Board studies helping to shape the state of the art: *Technical Methods to Support Analysis of Environmental Justice Issues* (2002) and *Effective Methods for Environmental Justice Assessment* (2004).

c. The environmental justice analysis included in EIR/EA Section 2.1.3.3 meets all requirements of the Executive Order, FHWA and DOT environmental justice policy and procedure, and applicable requirements of NEPA and CEQA. Cumulative effects related to environmental justice were also considered in Section 2.4.3.3. As described in the EIR/EA, construction and operation of the Bridge Replacement Alternatives would not directly or indirectly affect residences. The proposed project would not result in disproportionately high and adverse effects on minority and/or low-income populations and, when considered with other past, present, or reasonably foreseeable projects, would not result in cumulatively considerable significant or disproportionately high and adverse effects within the study area as it relates to EO 12898.

Separate and apart from this project, the Port has developed two programs in an effort to mitigate potential cumulative air quality and noise impacts of Port projects: (1) Schools and Related Sites Program -- Guidelines for the Port of Long Beach Grant Programs and (2) Healthcare and Seniors' Program-- Guidelines for the Port of Long Beach Grant Program. These programs are specifically aimed at sensitive populations (i.e., school-age children, senior citizens, and persons with specific respiratory illnesses), which have been identified by state and local air agencies as being particularly sensitive to air pollutants. The Schools and Related Sites Program focuses on school-age children and identifies schools, preschools, and daycare centers as eligible applicants for the funding opportunities of the program. The Health Care and Seniors' Facility Program is focused on specific prevention, education, and outreach programs, as well as direct mitigation projects, for schools, hospitals, healthcare facilities, retirement homes, senior centers,

and convalescent homes that help sensitive receptors such as children, senior citizens, and people with respiratory illnesses in areas near the Port.

The eligibility criteria for these programs have been developed to take into account that cumulative air quality and noise impacts are a function of distance from the Port and the Port's transportation routes. Accordingly, three zones of impact have been established for purposes of ranking each applicant based on the distance of each facility to the Port or the Port's transportation routes (e.g., I-710 and SR 47). Facilities within 1-mi of the Port or these transportation routes are defined to be in Zone 1, facilities within 2 mi are in Zone 2, and facilities within 3 mi are in Zone 3. In addition, because areas downwind (to the north and east) of the Port would be more heavily affected by pollution from Port and related goods movement activities, the guidelines in the two Port programs give preference to receptors and individual facilities located downwind.

The implementation guidelines for the two programs are: (1) establish eligibility criteria for potential applicants based on the facility type and proximity to the Port; (2) provide metrics that assess a proposed project's air quality, noise and/or health mitigation potential; and (3) explain how the Port Board of Harbor Commissioners should choose among eligible proposals and approve funding. As described in Chapter 3, Section 3.2.2.4, Mitigation CEQA (AQ)-1, the project will contribute \$1 million to each of the Schools and Related Sites Program and the Healthcare and Seniors Program.

d. Please see response to CSE-14d.

e. For the reasons stated above in response to CSE-28.b, Caltrans and the Port did not deem it necessary to retain an additional expert with regard to Environmental Justice issues. Moreover, Caltrans and the Port did an exhaustive review of potential project alternatives and mitigation measures and thoroughly considered and evaluated all known alternatives and mitigation technologies. The commenter has not explained how a consulting firm hired to research "Environmental Justice Community recommended alternatives" would be able to identify any additional technological approaches not already considered. Caltrans and the Port believe that their analysis is thorough and complies fully and in good faith with the spirit and intent of the laws and policies. Please see response to CSE-14d.

f. Please see responses to CSE-7, CSE-8, CSE-14, and CSE-15.

g. Please see the responses to similar comments CSE-7, CSE-8, CSE-14, and CSE-15; however, at the terminal level where the Port does have authority to restrict access based on equipment type, implementation is guided by the CTP, which utilizes existing regulatory emission requirements versus requiring Best Available Control Technologies; which are often financially infeasible on a large scale. However, a component of the Technology Advancement Program is development of "Green Container" Transport Solutions. The Ports will be investing in hybrid, alternative-fueled, and electrical trucks for moving containers from the Ports. Once proven as feasible, the technologies will be moved forward as mitigation measures in future CAAP updates.

h. Please see responses to CSE-7, CSE-8, CSE-14, and CSE-15. At the terminal level, where the Port does have authority to restrict access based on equipment type, all trucks currently serving the Port must meet 2007 emission standards in accordance with the CTP. Starting in 2012, all pre-2007 trucks will be banned from serving Port terminals. On trucks built in 2007 or later, fuel combustion efficiency equipment and high-efficiency pollution control devices are standard.

i. As set forth in Section 2.1.6.3 of the EIR/EA, until improvements are made to the Back Channel, ships larger than those that currently pass under the Gerald Desmond Bridge will not be able to access the terminals behind the bridge (see response to CSE-11 and SCAQMD-2). Thus, this project would not result in any direct increase in marine vessel air emissions as described in Section 2.2.5.3. For these reasons, there was no need for the EIR/EA to consider the AMECS for ship stack emissions as part of a bridge replacement project. Moreover, the Port is investing a significant amount of capital in

cold-ironing technology to achieve the greatest emission reductions in the long-term consistent with the CAAP. Consideration of technologies to reduce vessel emission is beyond the scope of this project.

CSE-29:

a. Please see response to CSE-28a.

b. The Port has provided the opportunity for affected communities, individuals, organizations, and groups to participate in the EIR/EA process by providing public notifications about preparation and availability of the EIR/EA. The Port has held public scoping meetings and public hearings to inform the public about the project, the alternatives, and the associated impacts. Meetings were held in evening hours in surrounding communities in locations that were as close as practical to areas most affected by the project. Most of the public comments received during the public comment period and at the public hearings were in favor of the project. A separate project-specific advisory committee is not necessary; however it should be noted that the Port has formed a community advisory committee in connection with implementation of the Port's mitigation grant programs that the project will be contributing to. The grant program advisory committees include an industry representative, a regulatory agency representative, and three Long Beach community representatives, appointed by the Mayor's Office, and will advise Port staff on the development of application materials, review of project applications, and award recommendations based on ranking criteria outlined in each of the three grant programs.

c. Please see response to CSE-28c.

d. Please see responses to CSE-7, CSE-8, CSE-14, CSE-15, and CSE-28.

CSE-30:

A. The EIR/EA does not include an assessment of public health impacts that would be covered in a Health Impact Assessment (HIA), as noted in the comment. The EIR/EA does, however, address public health impacts in the context of the HRA that was performed for the proposed project, following the analytical methods and guidance prescribed by the OEHHA and SCAQMD. The HRA used accepted mathematical models based upon a detailed set of technical assumptions and factors, applied to a broad study area in which potential residential, occupational, and sensitive receptors were identified. Applying these procedures resulted in findings that cancer risk and hazard indices are all below the established impact significance thresholds for all receptors. The above process is described in detail in EIR/EA Section 2.2.5.4.

The analysis of air quality health effects provided in the EIR/EA is not intended or required to be an exhaustive toxicological study; it does, however, disclose the potential air quality/health risk impacts/benefits from implementation of the proposed project. To address the list of 13 public health impacts noted in the comment would require toxicological studies that are beyond the bounds of typical project-level impact determinations required under NEPA and CEQA. Moreover, a study of this scope is not warranted because the analyses in the EIR/EA demonstrate the absence of health risk effects above established significance thresholds.

HIA approaches to evaluating impacts are, by definition, holistic, taking into account a broad range of factors. As stated in *A Health Impact Assessment Toolkit* (Human Impact Partners; April 2010) -- "The scope of a HIA assesses physical and mental health outcomes like mortality and disability, and also assesses behavioral, neighborhood, environmental and economic factors, as well. A broad definition of health is necessary because most social decisions affect health indirectly through effects on social or environmental conditions." To address such effects on a holistic basis would require a series of assumptions regarding second- and third-order effects that would be considered speculative. Moreover, potential outcomes affecting mental health and disability cannot be determined as a direct effect of a given project, would require the use of methodologies that are not generally agreed upon, and would produce results that would be speculative. Such analyses are not required under NEPA or CEQA, nor are they generally suited to the procedural and substantive requirements of NEPA or CEQA. Such studies tend to be longer term than HRAs, whereas the environmental review process is

supposed to have a beginning and end to facilitate informed and prompt decision making in a manner that does not unduly stifle project progression. For example, CEQA sets a 1-year time period for completing EIRs (see, e.g., PRC Section 21151.5).

Nonetheless, the underlying intent of the HIA approach – namely a comprehensive view of potential impacts on persons – is addressed in the EIR/EA in the sense that effects are considered and documented across a broad range of topics relating to the human environment. Included among these are land use, parks and recreation facilities, growth inducement, community character and cohesion, community facilities and services, relocations, environmental justice, traffic and circulation (including pedestrian and bicycle travel), visual and aesthetic considerations, hazardous waste/materials, public health and safety, air quality, noise, and energy. Therefore, a substantial portion of the subjects that would be examined in an HIA already are included in the EIR/EA.

B. The HRA was prepared using the methods recommended by Cal-EPA's OEHHA and the SCAQMD. The OEHHA develops guidelines to evaluate cancer and non-cancer effects from TAC exposure based on information available from published animal and human studies. Preparation of a public health status baseline study is not part of the recommended protocol to analyze health risks. The HRA prepared for purposes of this project assesses the impact of the proposed project as the risk increment related to the project (incremental decrease or increase). A baseline public health assessment of the area/region of the project is not an appropriate scope for the project. The HRA in the Draft EIR/EA provides adequate discussions of project health impacts for NEPA/CEQA purposes and complies with the current requirements for such an analysis.

C. The HRA conducted for the proposed project evaluated a broad geographic area within which sensitive receptors were identified (see EIR/EA Exhibit 2.2.5-1). A detailed grid was also used for purposes of estimating cancer risk within the study area (see Figure D-1; Appendix D; Revised Air Quality Technical Study; January 2010). The HRA analysis grid encompassed an area extending outward in all directions from the project site a distance of 5 km (3.125 mi).

In accordance with OEHHA recommendation, and consistent with other Port projects environmental studies (e.g., Middle Harbor), the study area for receptors (including the residents and offsite workers) extended approximately 5 km (3.125 mi) in all directions from the project corridor. Sensitive receptors, including schools, daycare centers, convalescent facilities, and hospitals, were identified within this distance using Internet searches, Long Beach School District maps, and state database information.

D. As described in Appendix D (HRA) to the Air Quality Technical Study, page D-10, the AERMET-processed meteorological data from the St Peter and Paul School Monitoring Station (a POLA monitoring station). This station is the most suitable for dispersion modeling in the Port area and was incorporated into the AERMOD model for conducting dispersion modeling for the project

- CSE-31:**
- a. Please see response to CSE-30a.
 - b. Please see response to CSE-30b.
 - c. Please see response to CSE-30b.
 - d. Please see response to CSE-30c.
 - e. Please see the response to comment 30d, above.

CSE-32:

a. As described in Section 2.2.5.4 of the EIR/EA, and as discussed in CSE-15, there are no significant public health impacts associated with construction or operation of the Build Alternatives. For this reason, mitigation is not required.

b. This comment requests that the Port establish a Public Health Care Mitigation Trust Fund based on a \$10.00 per TEU fees for every ship that passes beneath the new bridge. As explained above, this is not a terminal improvement project. Moreover, the Port already has established two programs to mitigate potential cumulative air quality and

noise impacts of Port projects: (1) Schools and Related Sites Program -- Guidelines for the Port of Long Beach Grant Programs and (2) Healthcare and Seniors Facility Program-- Guidelines for the Port of Long Beach Grant Program. As described in the Final EIR/EA, the proposed project will contribute \$1.0 million to each of these programs to fund projects specifically aimed at sensitive populations (i.e., school-age children, senior citizens, and persons with specific respiratory illnesses), which have been identified by state and local air agencies as particularly sensitive to air pollutants. The Schools and Related Sites Program focuses on school-age children and identifies schools, preschools, and daycare centers as eligible applicants for the funding opportunities of the program. The Healthcare and Seniors Facility Program is focused on specific prevention, education, and outreach programs, as well as direct mitigation projects, for schools, hospitals, healthcare facilities, retirement homes, senior centers, and convalescent homes that help sensitive receptors, such as children, senior citizens, and people with respiratory illnesses in areas near the Port.

The eligibility criteria for these programs have been developed to take into account that cumulative air quality and noise impacts are a function of distance from the Port area and the related goods movement transportation routes, including I-710 and SR 47. The most recent SCAQMD MATES III, the CARB DPM Exposure Assessment Study for the POLB and POLA Study, and recent modeling work completed in connection with development of the CAAP San Pedro Baywide Standard, have shown that areas downwind (north and east) of the Port are most heavily impacted by pollution from Port and related goods movement activities. For this reason, the guidelines in the two Port programs give preference to facilities closer to the Port because the sensitive receptors at these facilities would likely be exposed to greater cumulative air and noise impacts.

Natural Resources Defense Council, Dated 3/22/2010

NRDC-1: Both the Port and Caltrans believe that the EIR/EA complies with the requirements of both NEPA and CEQA and all relevant associated mandates. The document provides a thorough and comprehensive assessment of impacts, identifies those impacts deemed significant under CEQA, and prescribes reasonable and feasible mitigation measures for such impacts. A discussion of the project alternatives is also provided (see EIR/EA Sections 1.6, 1.7, and 1.8, including both physical and operational alternatives and design variations).

The proposed project is not a "massive freight expansion project" (as it is described in the comment) but is rather a project that is intended to provide a replacement bridge to address existing seismic deficiencies and provide sufficient capacity to accommodate anticipated future demand. The bridge has no direct relationship to expanded Port capacity, other than accommodating local and regional travel demand through the corridor. The replacement bridge would continue an existing linkage between Terminal Island and Long Beach/I-710.

The Port and Caltrans are not aware of crucial information that has been omitted, impacts that are underestimated, nor impacts or other relevant facts that have been ignored. The analyses and underlying assumptions throughout the document have been implemented and chosen to deliberately reflect a conservative (i.e., estimating greater, rather than fewer, impacts) view of likely impacts resulting from the project.

An open public comment and review process has been conducted, during which comments from all parties have been encouraged and accepted, including written comments and oral comments delivered at two widely advertised public hearings. It is the opinion of the Port and Caltrans that the EIR/EA is sufficient and that the review process has been satisfactory.

The commenter also states that, "this project will be funded by taxpayers to the tune of \$1.125 billion dollars..." As described in Section 1.6.1.1 of the Final EIR/EA, the most recent estimate for the preferred alternative is \$983 million dollars. The assertion that the project is funded solely by taxpayers does not acknowledge the substantial financial

contribution by the POLB from Port revenues. As described in CSE-6c, POLB revenues for the project are generated from terminal leasing and other operations within the POLB and not from taxpayers via the City general fund (see CSE-6).

Responses to detailed comments are provided below.

NRDC-2:

Caltrans, as the federal lead agency, has been delegated discretionary authority under SAFETEA-LU Section 6005 to determine which type of environmental document is required for projects under NEPA. Based on the information contained in, and the public comments received on, both the original EIR/EA (circulated in 2004) and the Revised Draft EIR/EA (circulated in February 2010), Caltrans has determined that an EA was the appropriate level of environmental document under NEPA for the proposed project.

The comment states that an EIS should have been prepared because the project is “highly controversial.” However, the public comments that have been received on both the original and the Revised EIR/EA have predominantly been supportive of the project; there has not been substantial debate or disagreement expressed over the project, indicating that in Caltrans’ judgment, it is not “highly controversial.”

The comment further states that an EIS should have been prepared for this project because it will result in significant impacts to the environment. The impacts referred to were determined to be significant under CEQA. As indicated in Chapter 3 Section 3.1 of the EIR/EA, the way in which significance is determined is one of the major differences between CEQA and NEPA. Under CEQA, the CEQA lead agency, in this case the POLB, is required to identify each “significant effect on the environment” resulting from the project. If the project may have a significant effect on any one or more environmental resources, then an EIR must be prepared. In addition, the CEQA Guidelines list a number of mandatory findings of significance, which also require the preparation of an EIR.

Under NEPA, an EIS must be prepared when the proposed project as a whole has the potential to “significantly affect the quality of the human environment.” The determination of significance is based on context and intensity. The severity of the impact must be examined in terms of the type, quality, and sensitivity of the resource involved; the location of the proposed project; the duration of the effect (short- or long-term) and other considerations of context. Significance of the impact will vary with the setting of the proposed action and the surrounding area. Some impacts determined to be significant under CEQA may not be of sufficient magnitude to be determined significant under NEPA. In addition, there are no types of actions under NEPA that parallel the findings of mandatory significance of CEQA.

It is therefore often the case that impacts are identified as significant under CEQA (requiring preparation of an EIR), but the project as a whole is not considered significant under NEPA (allowing preparation of an EA/FONSI). Examples of recent EIR/EAs completed by Caltrans can be reviewed on the Web at <http://www.dot.ca.gov/dist07/resources/envdocs/>. Based on the context and intensity of the impacts as described in Chapter 2 of the EIR/EA, it has been determined that the project will not result in a significant impact on the environment pursuant to NEPA, and an EA is the appropriate level of document.

NRDC-3:

The comment references studies prepared by others indicating that the traffic to and from the POLB is a major contributor to traffic congestion on the SR/I-710 freeway. It is not disputed that both San Pedro Bay Ports (Los Angeles, as well as Long Beach) account for the totality of the port-related traffic on the SR/I-710, and it should further be noted that it is the policy of both Ports to aggressively pursue an increased modal shift of cargo transport from trucks to rail, to the extent made practical by virtue of available handling facilities, consistent with mode choice and cargo destination; however, because the operation of the two Ports contributes to the congestion on SR/I-710 is not the issue at hand, which instead is: What are the impacts of modifying the existing Gerald Desmond Bridge as proposed? The modification of the bridge is not a terminal development or redevelopment project that directly generates new vehicle trips. It is a transportation project, which, while it will improve the flow of traffic, will not itself generate additional

traffic trips (apart from construction-related trips during construction). Thus, for example, the Institute of Traffic Engineers (ITE) Trip Generation Manual does not include trip generation rates for bridge replacement projects. This is no doubt because a bridge is not a destination, although it could affect route of travel that drivers choose to get to their destination.

The comment further asserts that the study area selected for the Gerald Desmond Bridge Replacement Project is too narrow and confined, and that explanations for the selection of the study area are lacking. Traffic and air quality are cited as primary examples of impacts pertaining to these assertions.

As required by both CEQA and NEPA, the purpose of the EIR/EA is to identify and disclose the potentially significant impacts (under CEQA) and/or major adverse effects (under NEPA) of the proposed Gerald Desmond Bridge Replacement Project, across a full spectrum of environmental factors. CEQA and NEPA do not mandate that agencies conduct a broad study addressing effects associated with activities not connected with the project being examined in the environmental document. Accordingly, the purpose of the EIR/EA is narrower in scope than the studies referenced in the comment. The EIR/EA for the proposed project is intended to examine those impacts that would logically occur as a result of replacing the existing bridge with a new bridge; therefore, comments illustrating impacts of general port activities as a whole are not relevant to the requirements of this environmental document, but are rather more appropriately directed to subregional and regional studies conducted for other purposes. The studies referenced in the comment – Los Angeles County Metropolitan Transportation Authority Study entitled I-710 Major Corridor Study and the Port of Los Angeles Baseline Transportation Study prepared by Meyer, Mohaddes & Associates – are examples of studies conducted for purposes different from that which this EIR/EA is required to fulfill.

Regarding the appropriateness of study areas, each of the impact factors considered in the environmental document were considered individually and study areas were identified for each, based upon a due consideration of the extent to which impacts of the proposed project would occur. A few examples illustrate this approach:

Land Use, Recreation, and Coastal Zone (Section 2.1.1) – The study area was defined as the Port's Northeast Planning District, within which the proposed project is entirely located and within which all affected land use impacts are contained.

Community Impacts (Section 2.1.3) – The study area was defined on the basis of potential effects circumscribed within an area of 11 adjacent census tracts. This study area definition touches portions of both Ports, the Wilmington community, and the southwestern portion of the City of Long Beach, to the east of the Los Angeles River.

Visual and Aesthetics (Section 2.1.7) – Both local and regional visual settings were defined, the former being confined to the immediate Port surroundings and the latter including distant views experienced by residents, recreational users, businesses, workers, and motorists.

Hazardous Materials/Wastes (Section 2.2.3) – An area extending 0.25-mi from the proposed project was considered and the effects pertaining to surrounding uses were also considered.

Public Health and Safety (Section 2.2.4) – The study area was defined to encompass the nearest emergency service responders and included both fire and police.

Noise (Section 2.2.6) – The study area was chosen based upon FHWA guidance and included the nearest areas of frequent human use, which were residential, park, and school uses east of the Los Angeles River.

Air Quality Study Area (Section 2.2.5.2) – Several study areas were defined, corresponding to the particular impact considered. For example, the SCAB, inclusive of some 6,745 square miles, is the context for criteria pollutant evaluation. The study area for addressing localized impacts extended as far as 1.3 mi from the project site to capture

potentially affected receptors. This definition resulted in the inclusion of 61 child-care centers, 24 convalescent homes, 49 schools, and 5 hospitals, as well as nearby residential areas (see Exhibit 2.2.5-1).

Traffic Study Area (Section 2.1.5.2) – The traffic study area defined in Section 2.1.5.2 of the Draft EIR/EA is appropriate to assess the potential traffic impacts of the project. The traffic study area includes those locations with sufficient additional traffic resulting from the operation of the replacement bridge or its construction activity to have a significant impact. The traffic study area was determined by evaluating the forecast changes in traffic for increases attributable to a replacement bridge that would potentially result in any of the following:

- Significant impacts at CMP monitoring locations where impact would be measured based on the criteria in the 2004 CMP for Los Angeles County;
- The addition to a signalized intersection of 50 or more vehicles during a peak hour as required by the City of Long Beach traffic impact analysis guidelines available from the City of Long Beach Department of Public Works Traffic and Transportation Bureau; and
- LOS F (over capacity) conditions on SR 710 north of the project to 9th Street or SR 47 (Seaside Avenue) west of Navy Way.

The study area extends to the east into downtown Long Beach as far as needed to include intersections expected to receive an additional 50 entering vehicles during a peak hour, consistent with the City of Long Beach traffic impact analysis guidelines cited above. To the west, the study area includes the intersection of Navy Way and Seaside Avenue. Farther west, the forecast volumes on Seaside Avenue are well within its capacity as a four-lane controlled-access roadway, and no LOS F conditions or significant impacts are expected. To the north, the additional volumes redistributed to I-710 do not create a significant impact at the CMP monitoring location at the Willow Avenue interchange with I-710. Nor do they create LOS F conditions or a significant impact on the portion of SR 710 south of 9th Street. Because the portion south of 9th Street has fewer lanes than portions to the north, it was concluded that there would be no significant impacts to SR 710 or I-710 farther north where the highway has more lanes.

As can be seen from the above examples careful thought was used to define each subject study area, such that potential impacts resulting from the proposed project would be captured and also that potentially affected persons and locations would also be identified. Accordingly, the various study areas were selected to be sufficiently broad to be sure that impacts of significance would be identified.

While it is true that traffic passing over the bridge can be found on I-710 as far north as I-105 and at other locations in the region, the EIR/EA is only concerned with changes in traffic attributable to the replacement bridge that would potentially result in significant traffic impacts. No changes in traffic attributable to the replacement bridge and potentially resulting in significant traffic impacts are expected outside the traffic study area because no significant impacts are expected:

- To the north of the project on I-710 at the CMP monitoring location at the Willow interchange or south of 9th Street;
- To the west of the project on SR 47 (Seaside Avenue) west of Navy Way; or
- To the east of the project at signalized intersections in downtown Long Beach because all intersections with a potentially significant impact are included within the study area.

The “I-710 Major Corridor Study” and the “Port of Los Angeles Baseline Transportation Study” referenced in the comment are studies that examine very different trip generation and trip redistribution potential than the bridge replacement. The former study involves potential capacity additions along I-710 for 18 mi north of the Ports. The latter considered

all traffic from all terminals and properties in both POLA and POLB. The EIR/EA for the bridge replacement properly examines only the potential for traffic impacts that might occur when a new bridge is constructed to replace the existing bridge.

Using the study areas described above, the EIR/EA identifies potential impacts associated with the proposed project and, where available, corresponding mitigation measures are offered to lessen such impacts. For example, traffic impacts accruing to the project along study area roadways, for both project construction and operations, are identified in Section 2.1.5 of the EIR/EA. Given the 50-trip criterion used to assess affected roadways, all potential impacts directly associated with the proposed project have been identified and addressed. Similarly, construction and operational air quality impacts have been identified and mitigation measures have also been identified (see Section 2.2.5).

The project is not a “freight expansion project” as stated in the comment. As is noted in Section 2.1.5 of the EIR/EA, the project is a bridge replacement and does not generate any additional new traffic in and of itself. Because the project provides more capacity than the existing bridge and thereby may reduce congestion on the bridge, some traffic avoiding the bridge under the No Action or Rehabilitation conditions may change travel path and use the new bridge. Such changed travel paths are identified and discussed in the EIR/EA as traffic redistributions. While it is true that traffic ultimately traveling across the bridge can be found on I-710 as far north as I-105 and at other locations in the region, the Bridge Replacement Alternatives would affect only the localized paths in the Port area to access these freeways and not the destination or origin of the goods being hauled. Thus, the traffic impact analysis within the EIR/EA is concerned with changes in traffic attributable to a replacement bridge and the potential impacts associated with these changes. No changes in traffic attributable to the replacement bridge and potentially resulting in significant traffic impacts are expected outside the traffic study area.

NRDC-4:

The EIR/EA analyzes all potentially significant effects of the proposed project and, where possible, identifies mitigation measures that would reduce those impacts to less than significant levels; however, even after incorporation of these measures, certain unavoidable significant impacts remain as defined by CEQA.

Regarding traffic, the CEQA analysis identifies temporary unavoidable significant impacts at four intersections during the construction phase and a significant unavoidable impact at one intersection after the new bridge is put into service. No other significant impacts were identified and each is described below (see Chapter 3, Section 3.14).

Regarding the four intersections affected during construction, two are the intersections of the Ocean Boulevard EB and WB service roads with the Terminal Island Freeway described in Section 2.1.5.3 under the heading “Construction Impacts.” During construction stages when the Terminal Island East Interchange (i.e., the Horseshoe Ramps) is closed, these two intersections are along the detour route. WB traffic on the bridge bound to Pier T, which would normally exit Ocean Boulevard at the Horseshoe Ramps, will be detoured west along the WB Ocean Boulevard service road to complete a “u-turn” at the Terminal Island Freeway by making left turns at both of the referenced intersections and passing beneath the Ocean Boulevard overcrossing. Similarly, traffic from Pier T to Ocean Boulevard EB, which would normally enter Ocean Boulevard at the Horseshoe Ramps, will be detoured through the same two intersections. These detours will increase the traffic volumes at the two intersections on the Terminal Island Freeway beneath the Ocean Boulevard overcrossing. The overcrossing span limits the ability to provide additional lanes to service the increased volume on the detour. Other alternative detour routes were considered, but none were deemed acceptable.

The other two intersections affected during construction are the intersections of Pico Avenue with Pier B Street/9th Street and Pier D Street. During Construction Stages 3 and 4, the connector between EB Ocean Boulevard and NB SR 710 will be closed. Traffic on that movement will be detoured along NB Pico Avenue. At the intersection of Pico

Avenue, Pier B Street, 9th Avenue, and the SR 710 ramps, the detoured traffic must make a left turn onto the SR 710 NB entrance ramp, thereby congesting the intersection. The following intersection mitigations are identified in Section 2.1.5.4 of the EIR/EA:

- Add dual NB right-turn lanes;
- Restripe EB through/right lane to a right-turn lane;
- Provide one EB through lane;
- Continue two SR 710 SB off-ramp lanes to Pico Avenue;
- Restripe NB through lane to a NB left-turn lane;
- Widen SB approach and provide two left-turn lanes and one through lane; and
- Continue two on-ramp lanes to NB SR 710.

These measures exhaust the improvements that are feasible at the intersection; however, they are not sufficient to fully mitigate the significant impact during Construction Stages 3 and 4. Other alternative detour routes were considered, but none were deemed acceptable. Because of their temporary nature, the impacts were considered minor for purposes of NEPA but significant for purposes of CEQA because CEQA looks at each impact on a standalone basis.

The intersection of Pico Avenue and Pier D Street is affected by the closure of the connector between EB Ocean Boulevard and NB SR 710 described above. The additional traffic on NB Pico Avenue at Pier D Street would be partially mitigated by installation of a traffic signal, as noted in Section 2.1.5.4 of the Draft EIR/EA. If sufficient green time is allocated to the heavy NB detour traffic volume, there would be insufficient green time available to serve Pier D Street. Additional mitigation measures, including adding a NB lane, was considered, but ROW was determined to be inadequate.

The EIR/EA identifies only one long-term significant traffic impact that is not mitigated under CEQA at the intersection of Navy Way and Seaside Avenue. The impact is addressed under NEPA. Several alternative mitigation measures are identified for the intersection. The impact is not mitigated under CEQA because the Port has no authority to implement improvements at the intersection because it lies outside the Port's jurisdiction. If mitigation measure TC-5 (described in Section 2.1.5.4) is implemented under NEPA, or if any of the other improvements identified for the intersection as described in Section 2.1.5.4 are implemented, the impact would be addressed.

The commenter states that "increasing transit service to the Port would obviously reduce traffic impacts." The evidence shows that there is currently transit service in the vicinity of the project's sole long-term significant traffic impact at the intersection of Navy Way and Seaside Avenue. The commenter states that "increasing transit service to the Port would obviously reduce traffic impacts." Increased public transit at the Port facilities would not take trips off Ocean Boulevard. The general public does not travel to the Port. The vehicle traffic generated by the Port will be largely truck traffic that would not involve public transit, and terminal operators currently operate shuttles to transport longshoremen to the terminals when ships arrive. This practice will continue and is part of the CAAP that the Port will continue to enforce through leases with the terminal operators; therefore, increased transit service to the Port would not address traffic impact issues.

Implementing transit routes is primarily a business decision that Long Beach Transit (LBT) would make based on the demand along a certain route. Based on information about ridership on the Los Angeles Department of Transportation (LADOT) Commuter Express Route 142, demand is low and there is sufficient capacity on the buses serving this route, so additional service would not be prudent. Currently, only 15 passengers per hour use this service during the weekdays, with a daily ridership of 147 passengers. This shows that there is not much demand on the route. The service is operated daily from approximately 5:30 a.m. to 11:00 p.m. and provides service on Navy Way south of

Seaside Avenue in the immediate area of the project's sole long-term significant traffic impact. Additional transit service at this location would not reduce this impact.

The commenter argues that transit improvements would mitigate air quality and GHG impacts. There is also no evidence that additional transit service would reduce vehicular traffic or serve as effective measures for air quality and/or GHGs in the vicinity of the Port; however, as discussed in Section 3.3.2 of the EIR/EA, the Port is developing a Climate Change/GHG Strategic Plan that will examine GHG impacts for all activities within the Harbor District and strategies for reducing the overall carbon footprint of these activities. The Port has already undertaken many activities described in Section 3.3.2 of the EIR/EA to address climate change and GHGs.

The commenter states that the Port can improve truck efficiency and thereby reduce truck traffic by requiring all trucks accessing the Port to be owned by an asset-based trucking company. The commenter further claims that this Port trucking model would reduce the amount of commute-only trips. Neither of these conclusionary assertions is supported by facts of any kind. Moreover, neither assertion can be substantiated because they are untrue.

As part of the CAAP, the POLB and POLA implemented a Clean Trucks Program (CTP). The CTP currently bans from the ports all 1993 and earlier truck engines and nearly all 1994-2003 truck engines. Although the CTP is almost identical at POLB and POLA, the two ports opted to implement the truck ban and the other requirements of the CTP in slightly different manners. POLB requires truck operators to sign a registration agreement and allows both independent owner operators and asset-based trucking companies to access its terminals. In contrast, POLA's program as adopted allows only asset-based trucking companies with driver employees to access its terminals and requires such companies to sign a concession agreement rather than a registration agreement. The "employee mandate" component of the POLA program has been controversial and was enjoined by a federal court in April 2009 in *American Trucking Associations v. Los Angeles, Long Beach, et al.*, United States District Court, Central District of California, Case No. CV 08-04920 CAS (CTx).

The current drayage system at both of the ports is overwhelmingly based on owner operators. POLB determined that allowing this model to continue while requiring newer trucks and subsidizing their purchase would be the best mechanism to move to a clean and sustainable drayage fleet. Claims that the "employee mandate" model is more efficient or somehow reduces truck traffic as compared to the POLB approach are unsubstantiated by the commenter. There have been no comprehensive studies supporting a finding that the "employee mandate" model reduces commute-only trips, nor have there been documented findings on efficiency differential, especially since an owner-operated truck also could be used for multiple shifts. In fact, the POLA "employee mandate" model may result in more total passenger and truck trips because employee truck drivers would be required to commute to and from worksites for their shifts. Whether a truck enters a terminal pursuant to a registration agreement or a concession agreement is irrelevant to the environmental impact of that truck trip. Similarly, whether the driver is an owner operator or an employee also is irrelevant to the environmental impact of the truck trip; therefore, even if the employee mandate had not been enjoined by a federal court, such a requirement for drivers would not function to reduce or mitigate any environmental impact of the proposed project or the alternatives.

NRDC-5: As noted in the comment, the Port has developed mitigation grant programs to address impacts of Port projects in the surrounding communities. See response to CSE-28, CSE-29, CSE-32, and NRDC-6 for more information about two of the grant mitigation programs. Regarding project contributions to these programs, the comment inappropriately attempts to calculate this project's contribution to those programs based on the estimated construction cost of the project compared to the Port's Middle Harbor Redevelopment Project. Construction costs are irrelevant to the impacts of a project; however, the methodology for determining the funding amount associated with the project has been adjusted to better take into account a number of factors, including the Ports'

progress in reducing emissions through implementation of the CAAP, as a measure of cumulative impacts, and project-specific impacts when compared to established significance thresholds. The net result of this revision is an increase in total funding for the programs, although the nature of the projects and activities that would be funded by the contributions to the programs is unchanged.

For these reasons, the Gerald Desmond Bridge Replacement Project will contribute \$1 million each to the POLB Schools and Related Sites Program -- Guidelines for the Port of Long Beach Grant Programs and Healthcare and Seniors' Facility Program--Guidelines for the Port of Long Beach Grant Program. Methodology for this calculation is provided below, as described in the refined Mitigation Measure CEQA (AQ)-1 in Final EIR/EA Chapter 3 Section 3.2.2.4. The adjusted methodology is described below.

CEQA (AQ)-1: Cumulative Air Quality Impact Reduction Program. To help reduce air quality impacts associated with the project, the Port will require the project to make a contribution to the Schools and Related Sites Guidelines for the Port of Long Beach Grant Programs and to the Healthcare and Seniors Facility Program Guidelines for the Port of Long Beach Grant Programs. Although all feasible mitigation measures that would lessen significant environmental effects have been incorporated into the project, contributions to these grant programs are intended to fund projects or activities that could provide additional emission or exposure reductions in the communities surrounding the Port beyond what can be achieved through incorporation of all feasible mitigation measures. The types of projects that will be funded through these programs are described in detail in the guidelines for the Schools and Related Sites Program and the guidelines for the Healthcare and Seniors Facility Program, which are available by request from the Director of Environmental Planning or on the Port's Web site at <http://www.polb.com/grants>. While the guidelines identify the projects that can be funded from contributions to the programs, the project takes no specific credit for any emission reductions that may result from any funded projects because it is not possible to quantify any emission reductions until such time as grants are awarded. Instead, the EIR/EA analyzes all environmental impacts, identifies all feasible mitigation measures, and reaches conclusions regarding unavoidable significant effects of the project without taking into account any specific benefits that may result from contributions to the programs.

Project Air Quality Impacts. As discussed in previous sections of this document, the project would contribute to local and regional air quality impacts in the following ways: First, it would produce emissions of criteria pollutants during the project's 5-year project construction period, which includes demolition of the existing bridge. Such emissions have been estimated to exceed the SCAQMD threshold of significance for only one pollutant – NO_x. That exceedance has been estimated to occur on a peak daily basis during years 2 and 3 of the construction period.

Second, operation of the new bridge would result in daily operational emissions that would be expected to be below the SCAQMD significance threshold for all but one criteria pollutant – NO_x. Based on the analysis presented in Section 2.2.5 of the EIR/EA, operation of the project would yield an estimated daily exceedance of the SCAQMD significance threshold for NO_x in the opening year (2015), but it would not show an exceedance of that threshold by the year 2030. Assuming that a straight line decline in emissions would occur over the intervening time, the SCAQMD significance threshold would be reached approximately 13 years after opening of the new bridge, or by 2028. When compared with CEQA Baseline (year 2005) conditions, years 2015 and 2030 show substantial declines in NO_x emissions under both the No Project and Project scenarios. It is only when compared to the NEPA Baseline (i.e., against No Project) conditions that the project shows an estimated small increase in NO_x emissions. Because the bridge carries a combination of Port-related and regional traffic, it is a conservative assumption to associate all of the increased NO_x emissions with the proposed project.

Third, the project would have a very small contribution to MSAT production. Again, when comparing against the CEQA Baseline, both the 2015 and 2030 No Project and Project

conditions show substantial estimated reductions; however, when compared with the NEPA Baseline/No Project conditions, the project would result in additional daily contributions of total MSATs on the order of 1.4 pounds per day and 0.9 pounds per day, in 2015 and 2030, respectively. PM_{2.5} production, compared to the NEPA Baseline/No Project Alternative, is estimated to be 11 pounds per day in 2015 and 6 pounds per day in 2030.

Fourth, while all CEQA estimates for cancer risk, chronic hazard indices, and acute hazard indices for residential, occupational, and sensitive receptor exposure show decreases when compared to the CEQA Baseline, there are small estimated increases, none of which rise above established thresholds of significance, when the project is compared to the NEPA Baseline/No Project conditions.

Grant Funding Level Methodology and Formulas: This section describes the methodology and related formulas that will be used to establish the project's contribution to the two grant programs. There are three steps in calculating the grant funding level, each of which is explained in more detail below:

1. Using the Middle Harbor Redevelopment Project funding levels as a baseline, calculate a base funding level that reflects ports-wide air quality and health risk impacts at the start of project construction.
2. Using project-specific PM_{2.5} incremental emission impacts, adjust the amount from Step 1 to account for project-specific contributions to cumulative air quality impacts.
3. As appropriate and justified based on other factors that have not been captured in Steps 1 and 2, adjust grant funding levels.

Step 1: The baseline funding is the \$10 million contributed by the Middle Harbor Redevelopment Project for both the Schools Grant Program and the Healthcare and Seniors Grant Program. This baseline is appropriate because, as additional CAAP measures are implemented over time that result in emission reductions, it is anticipated that a project that begins construction in a future year will result in lower cumulative air emission impacts than the Middle Harbor project, which began construction in 2009. While cumulative air quality impacts are traditionally evaluated qualitatively as part of most CEQA/NEPA project evaluations, the CAAP allows the ports to comprehensively look at current and future expected port-related projects and their expected air quality impacts. By forecasting emissions and taking into account pre-recession Ports' growth estimates, future terminal development, implementation of CAAP emission reduction strategies, and adopted regulations, the CAAP allows the Ports' to quantitatively assess risk from future port-related operations and establish long-term goals that reduce long-term cancer risk and "achieve an appropriate 'fair share' of necessary pollutant emission reductions" to achieve regional attainment of federal ambient air quality standards (CAAP Technical Report, page 11). While other non-port-related sources contribute to air pollution and the cumulative burden, Port-related sources contribute a significant portion of local air quality impacts; therefore, changes in Port-related emissions directly affect the cumulative burden experienced by communities surrounding the Ports.

This baseline funding amount is therefore adjusted to account for the forecasted reductions in DPM emissions at the anticipated construction start date for the project. Because DPM has been identified as a TAC by the State of California and is the primary driver of Port-related cancer risk, the Ports use changes in Port-related DPM inventories to assess changes in risk, as described in the draft 2010 CAAP update. The Ports have DPM emission inventories for 2005 through 2009 and have forecasted DPM emissions for 2020. Based on recent updates to the CAAP, the following cumulative emission reductions have been achieved as of 2009 compared to the 2005 baseline: 52 percent reduction in DPM, 35 percent reduction in NO_x, and 46 percent reduction in SO_x (CAAP, 2006; Draft 2010 CAAP Update; 2009 Emissions Inventory).

Table 3-3 summarizes the percent reduction in DPM emissions achieved as of 2009 compared to the 2005 baseline year. In addition, the forecasted reductions in DPM emissions from the 2005 baseline were estimated in the 2010 CAAP Update for 2009 through 2014 and for 2023, as summarized in Table 3-3.

This step of the grant contribution calculation is designed to address the amount of Port-related DPM emission reductions not yet achieved as of the project construction start date (i.e., 1-% CAAP DPM Reduction Achieved/100). When the DPM reduction factor is applied to the base funding amount, the calculation for Step 1 is \$10 million x (1-% CAAP DPM Reduction for Project Construction Year/100).

Table 3-3 Anticipated CAAP Diesel Particulate Matter Emission Reductions								
Emission Reductions Compared to 2005 Baseline	Actual	CAAP Forecast						
	2008	2009	2010	2011	2012	2013	2014	2023
DPM	22%	25%	60%	60%	68%	68%	72%	75%

Using the construction start date for the Gerald Desmond Bridge Replacement Project, the following forecasted CAAP DPM emissions compared to the 2005 baseline are applicable.

Project	Construction Start Date	CAAP DPM Reduction (%) Compared to 2005 at Construction Start Date
Gerald Desmond Bridge	2011 (see Table 3-3)	60

Using these figures in the Step 1, the calculation is

$$\$10 \text{ million} \times (1 - 60/100) = \$4 \text{ million}$$

Step 2: To account for the varying contributions by different types of projects to cumulative impacts, the Step 1 funding amount determined above is adjusted for project-specific impacts. The project-specific adjustment is based on the project-specific impacts compared to the CEQA Baseline and the No Build/No Project Alternative. The purpose of this step is to require greater funding from projects with significant project emissions and to require less funding from projects that do not exceed SCAQMD significance thresholds. Consistent with Step 1 and the discussions above, PM_{2.5} emissions, which are typically DPM for Port-related projects, are used as a surrogate. The project-specific adjustment is then determined by comparing the operational DPM emissions increase relative to the CEQA Baseline and the No-Build/No Project Alternative to the values included in Table 3-4. These factors account for projects in which the incremental PM_{2.5} emissions (compared to the CEQA Baseline and/or the future No-Project Alternative) are below or significantly above SCAQMD’s CEQA significance threshold (55 pounds per day). Under this scenario, the project-specific funding amount would be decreased by 50 percent for projects with PM_{2.5} emissions relative to the NEPA No Project baseline that are less than the SCAQMD significance threshold.

Table 3-4 Project-Specific Adjustment Factors Relative to DPM Emission Increases	
Project-Specific PM_{2.5} Emissions Increase (pounds per day)*	Project-Specific Adjustment (A_{PS})
< 55	50%
55 - 100	100%
101 – 150	150%
> 150	200%

* As compared to the No-Build or No Project Alternative.

This adjustment is then applied to the Step 1 amount. Overall, the combined Schools Grant Program and the Healthcare and Seniors Grant Program funding contribution methodology entails the following calculation:

$$\text{Total (Schools and Healthcare/Seniors Programs) (\$)} = \text{Step 1 amount} \times \text{Step 2 percentage}$$

As discussed above, the project-specific PM_{2.5} emissions increase relative to the No Project Alternative (NEPA baseline) for the Gerald Desmond Bridge Replacement Project is 11 pounds per day (2015) and 6 pounds per /day (2030); there is a net decrease compared to the CEQA Baseline. Comparing this number to Table 3-4 provides a project-specific adjustment factor of 50 percent. This adjustment is then applied to the Step 1 amount to give a final combined funding contribution amount for the Schools Grant Program and the Healthcare and Seniors Grant Program.

Gerald Desmond Bridge potential combined funding contribution

$$= \$4 \text{ million} \times 50\%$$

$$= \$2 \text{ million total (\$1 million each to the Schools and Healthcare/Seniors Programs)}$$

Step 3: The Board may also want to consider other unique factors, which may cause the calculation above to not reflect project circumstances, in determining the final amount of the contribution to the grants programs; however, no adjustments to the calculated amounts appear to be needed for purposes of the project, so the \$2 million set forth at the end of Step 2 remains the appropriate recommendation.

Distribution of Funding Contributions

The distribution of the funds being contributed to the Schools and Related Sites and Healthcare and Seniors Facility Programs to potential applicants and projects will be determined in accordance with guidelines for the two programs. The process includes evaluation by an advisory committee established to make recommendations to Port staff and then approved by the Board of Harbor Commissioners. The timing of the payments pursuant to this mitigation measure shall be made by the latter of the following two dates: (1) the date that the Port issues a Notice to Proceed or otherwise authorizes commencement of construction on the project; or (2) the date that the Gerald Desmond Bridge Replacement Project Final EIR/EA is conclusively determined to be valid, either by operation of PRC Section 21167.2 or by final judgment or final adjudication.

NRDC-6:

As is noted in the response to comment NRDC-3 above, several study areas were defined for purposes of analyzing different types of air quality impacts (see EIR/EA Section 2.2.5) that were evaluated in the environmental document. For example, the SCAB, inclusive of some 6,745 square miles, is the context for evaluation of criteria pollutants. Project-related criteria pollutant emissions were calculated (see Table 2.2.5-9) along the project corridor, because that is where the effects of the project would occur, based upon a criterion of 50 or more trips per peak hour being added to roadway intersections (see the response to comment NRDC-3 above for an explanation of the

traffic corridor study area). The results displayed in Table 2.2.5-9 demonstrate that this study area was chosen appropriately because the analysis revealed no impacts when compared with the SCAQMD significance thresholds. It is therefore reasonable to conclude that no impacts would occur in a larger study area.

Similarly, the study area for localized emissions analysis (NO_x, CO, and PM) also corresponded to the traffic corridor study area, for the same reason as is stated above. Review of Tables 2.2.5-15, 2.2.5-16, and 2.2.5-19 indicate that the proposed project would not generate substantial amounts of CO or PM; therefore, it is reasonable to conclude that this finding also would hold true for any larger study area.

In addition, local area MSATs were evaluated within the project corridor and again the results (see Exhibit 2.2.5-5) showed that: (a) future year baseline emissions of DPM, acetaldehyde, benzene, 1,3-butadiene, acrolein, and formaldehyde are expected to be substantially lower than at present, and (b) additional emissions associated with the project are expected to be small. Again, the choice of a larger study area would not yield different results.

For purposes of the HRA, a broad study area was defined that extended over 1-mi distant from the project. This definition circumscribes 61 child-care centers, 24 convalescent homes, 49 schools, and 5 hospitals, as well as nearby residential areas (see Exhibit 2.2.5-1). Again, the results presented in Table 2.2.5-22 show impacts below the established significance threshold.

Neither the analysis of GHGs nor the proposed mitigation is "deeply hidden" as asserted by the comment. The mitigation measure can be found in Section 3.2.2.4 and analysis can be found in Section 3.3. Regarding the study area, as is described in EIR/EA Section 3.3.4, the project corridor was again chosen as the appropriate study area within which to calculate GHG production because the corridor has already been demonstrated to be appropriate for purposes of the traffic analysis and localized air quality analysis. The corridor is also appropriate because the project merely accommodates trips within it; no new trips are generated by the project and therefore a logical argument cannot be made for a capture area extending beyond the immediate vicinity.

Furthermore, as discussed in EIR/EA Section 3.3.4, although California law now states that climate change is a topic subject to disclosure under CEQA, no guidance has as of yet been promulgated to determine project-level significance for transportation projects. In the absence of guidance to prescribe an appropriate measure of significance, as well as study area, those decisions are left to the discretion of the CEQA lead agency. It is important to note that the recently adopted CEQA Guideline Section 15064.4 instructs lead agencies to focus on GHG emissions "resulting from" the project. This was specifically modified from an earlier draft of the section, which had referenced the need to study GHG emissions "associated with" a project. Given this "resulting from" language, and the fact that the traffic consequences are reasonably circumscribed by the transportation analysis corridor, and further given that the expected project versus no project differences are captured within that corridor, it is reasonable to use that same corridor as the study area for GHG estimation.

As can be seen from the above information, the study areas chosen for the air quality analyses, including GHGs, have been selected carefully to capture the effects of the project and to include the likely receptors of those effects.

Regarding GHG mitigation measures, the following is our response:

Chapter 9 and Appendix B of the CAPCOA reference (*CEQA & Climate Change; January, 2008*) reveal the following: (1) Chapter 9 discusses example mitigation measures to be applied to residential and commercial development projects, General and Specific Plans, Air District Plans and Rules, and RTPs – no examples are discussed pertaining to transportation projects; and (2) Appendix B offers a broad range of mitigation measures, but none are applicable to a project such as the Gerald Desmond Bridge Replacement Project, with one exception (MM M-1 on page B-33). Transportation

measures include pedestrian and bicycle enticements and parking restrictions. There are two measures noted under the heading of Regional Transportation Plan Measures - HOV lanes and tolls/user fees (the latter is discussed in EIR/EA Section 1.7.1). Under Circulation, the measures include providing for safe and convenient local travel and enhancing the regional transportation network, both of which the project would do. Also under this heading are measures addressed to public transit and pedestrian/bicycle strategies; the former does not pertain to the proposed project and the latter is discussed in responses to other comments (see responses to Comment Nos. 3-8 from LBDS). Under Land Use, one measure asks that roads be made safe, accessible, and attractive for use day or night, which the project would do. Under Miscellaneous, Measure MM-1 identifies "off site mitigation fee program". Other than these measures, no others are offered that pertain to transportation projects.

Regarding the Attorney General document referenced in the comment (*Addressing Climate Change at the Project Level*; 1/6/2010), the following mitigation measures are offered:

1. Meet an identified benchmark for reducing GHGs (e.g., VMT per capita).
2. Adopt a comprehensive parking policy that discourages private vehicle use.
3. Build transit stops.
4. Provide public transit incentives.
5. Promote "least polluting" ways for people to travel.
6. Incorporate bicycle lanes into street systems.
7. Require amenities for non-motorized transportation.
8. Ensure that projects do not disrupt or create barriers to the use of non-motorized transportation.
9. Connect parks and open space.
10. Improve bicycle and pedestrian access to schools.
11. Institute teleconferencing, telecommuting, and flexible work hours.
12. Provide information on alternative transportation options.
13. Educate consumers about GHGs.
14. Purchase or create incentives for zero-emissions vehicles.
15. Create/promote ride-sharing programs and vanpools.
16. Create local networks for electric vehicles.
17. Enforce vehicular idling time restrictions.

Items 6 and 8 are addressed in the response to comments LBDS-2, LBDS -6, LBDS-7, and LBDS -8, and Item 14 is addressed in the response to comment CSE-28d. All of the others are either program-level measures (some of which the Port is pursuing) or are not relevant to the proposed project.

On page 17 of the document, the Off-Site Mitigation is recommended:

If, after analyzing and requiring all reasonable and feasible on-site mitigation measures for avoiding or reducing greenhouse gas-related impacts, the lead agency determines that additional mitigation is required, the agency may consider additional off-site mitigation. The project proponent could, for example, fund off-site mitigation projects that will reduce carbon emissions, conduct an audit of its other existing operations and agree to retrofit, or purchase verifiable carbon "credits" from another entity that will undertake mitigation.

The EIR/EA does, in fact, include recommendations for applicable feasible GHG reduction measures; specifically, Section 3.2.2.4 includes a prescribed reduction measure entitled *CEQA (GHG)-1: Greenhouse Gas Emission Reduction Program*, which provides funding for the project to the Ports' GHG Emission Reduction Program. The GHG Emission Reduction Grant Program addresses ways that the Port can reduce the impacts of GHGs. Often, as is the case with the Gerald Desmond Bridge Replacement Project, GHGs cannot be mitigated on a project site and, as a result, the GHG Emission Reduction Program funds projects that can be implemented outside the boundaries of the development or operation emitting the GHGs. Control and/or avoidance or reduction of project-related GHG sources associated with the Gerald Desmond Bridge Replacement Project (tailpipe emissions) are controlled/regulated at the State and federal levels and are outside of Port or Caltrans jurisdiction. As described in the Final EIR/EA CEQA (GHG)-1, the Port will require the project to contribute \$400,000 to the Port's GHG Emission Reduction Program. Projects funded by contribution to the GHG Emission Reduction Program are intended to partially offset the incremental effects of the Gerald Desmond Bridge Replacement Project's cumulative contribution to increases in GHGs. As is noted, and consistent with the discussion above, the CAPCOA document indicates that contribution to an "offsite mitigation fee program" (MM M-1 on page B-33) is an effective measure applicable to transportation projects such as the Gerald Desmond Bridge Replacement Project. Additionally, other measures applicable (directly or indirectly) to construction or operation of the proposed project are also discussed in EIR/EA Section 3.3.4 under the heading "Mitigation Measures," which includes measures recommended in the CARB Scoping Plan and by the Caltrans CAP (see Table 7, below).

The POLB recognizes the potential adverse effects of climate change and is pursuing a proactive approach to controlling GHG emissions within the Port's jurisdiction. As is noted in EIR/EA Section 3.2.2 (beginning on page 3-2), based upon an action by the Port's Board of Harbor Commissioners, a number of specific actions have been undertaken to address this issue. The Port believes that a programmatic approach will yield the most effective methods of addressing GHG production. As previously discussed, there are no other feasible measures for application to individual transportation projects, and a contribution of \$400,000 to the Port's GHG Emission Reduction Program, as required by mitigation measures CEQA (GHG)-1 described below, would partially offset the project contribution to cumulative GHGs emissions; however, as discussed in detail in Chapter 3, the Port nonetheless concludes that these cumulative impacts remain significant and unavoidable.

Contributions to the GHG Emission Reduction Program are intended to fund projects or activities that could provide additional emission reductions in the communities surrounding the Port beyond what can be achieved through incorporation of all feasible mitigation measures. The types of projects that will be funded through this program are described in detail in the guidelines for the GHG Emission Reduction Grant Program, which are available by request from the Director of Environmental Planning or on the Port's Web site at <http://www.polb.com/grants>. While the guidelines identify the projects that can be funded from contributions to the programs, the Project takes no specific credit for any emission reductions that may result from any funded projects because it is not possible to quantify any emission reductions until such time as grants are awarded. Instead, the EIR/EA analyzes all environmental impacts, identifies all feasible mitigation measures, and reaches conclusions regarding unavoidable significant effects of the project without taking into account any specific benefits that may result from contributions to this program. It should be noted that there was a mathematical error in the Draft EIR/EA, which previously stated that the contribution would be \$647,000. While the methodology described was presented correctly, the mathematical error resulted in a misstatement of the proposed funding amount, which should have been presented as \$400,000. An explanation as to how the funding amounts for the project contribution to the GHG Emission Reduction Program were calculated utilizing the same methodology from the Draft EIR/EA is provided below:

Table 7. Climate Change Strategies

Strategy	Program	Partnership		Method/Process	Estimated CO ₂ Savings (MMT)	
		Lead	Agency		2010	2020
Smart Land Use	Intergovernmental Review (IGR)	Caltrans	Local Governments	Review and seek to mitigate development proposals	Not Estimated	Not Estimated
	Planning Grants	Caltrans	Local and regional agencies & other stakeholders	Competitive selection process	Not Estimated	Not Estimated
	Regional Plans and Blueprint Planning	Regional Agencies	Caltrans	Regional plans and application process	0.975	7.8
Operational Improvements & Intelligent Trans. System (ITS) Deployment	Strategic Growth Plan	Caltrans	Regions	State ITS; Congestion Management Plan	.007	2.17
Mainstream Energy & GHG into Plans and Projects	Office of Policy Analysis & Research; Division of environmental Analysis	Interdepartmental effort		Policy establishment, guidelines, technical assistance	Not Estimated	Not Estimated
Educational & Information Program	Office of Policy Analysis & Research	Interdepartmental, Cal-EPA, CARB, CEC		Analytical report, data collection, publication, workshops, outreach	Not Estimated	Not Estimated
Fleet Greening & Fuel Diversification	Division of Equipment	Department of General Services		Fleet Replacement B20 B100	0.0045	0.0065 0.45 .0225
Non-vehicular Conservation Measures	Energy Conservation Program	Green Action Team		Energy Conservation Opportunities	0.117	.34
Portland Cement	Office of Rigid Pavement	Cement and Construction Industries		2.5 % limestone cement mix 25% fly ash cement mix > 50% fly ash/slag mix	1.2 .36	3.6
Goods Movement	Office of Goods Movement	Ca- EPA, CARB, BT&H, MPOs		Goods Movement Action Plan	Not Estimated	Not Estimated
Total					2.72	18.67

Source: Climate Action Program at Caltrans

CEQA (GHG)-1: Greenhouse Gas Emission Reduction Program Guidelines (GHG Program). To address the cumulative GHG impacts of the Gerald Desmond Bridge Replacement Project, the Port will require the project to provide funding for the GHG Program. The Gerald Desmond Bridge Replacement Project is estimated to result in 47,169 metric tons per year of CO_{2e} in 2015 and 55,999 tons per year of CO_{2e} in 2030. When compared with the CEQA Baseline (year 2005) condition, these estimates show increases of 14,291 metric tons per year (2015) and 23,121 metric tons per year, respectively. When compared with the NEPA Baseline (i.e., No Project) condition, the estimated increases are smaller, namely 5,618 metric tons per year (2015) and 6,383 metric tons per year (2030), respectively. These increases are considered by the Port to be cumulatively considerable, although specific thresholds to establish significance have not been adopted for transportation projects. It should be noted that, similar to the discussion under Mitigation Measure AQ-1, the new bridge will carry both Port-related and regional trips, as are being carried on the existing bridge. Because the above figures include Port-related and regional trips, they represent conservative estimates of potential impacts.

The calculation of the contribution to be made to the GHG Emission Reduction Program is based upon a consideration of the contribution to daily cumulative emissions occurring from the project, as compared with the CEQA Baseline condition. This is consistent with the approach used for the Middle Harbor Redevelopment EIS/EIR. Research has indicated that the cost of verified emission reductions from established mitigation measures ranges between \$5 and \$14 per ton of CO_{2e} reduced. SCAQMD has taken this research and, in Rule 2702 (adopted February 6, 2009), has established a “fair upper range” fee of \$15 per ton of CO_{2e} produced. This conservative rate has been applied to GHG emissions associated with the Gerald Desmond Bridge Replacement Project. Using the difference between year 2030 Project versus CEQA Baseline quantity calculations yields the following:

$$\begin{aligned} \text{GHG Mitigation Contribution} &= \text{Gerald Desmond total annual contribution (year 2030)} - \text{CEQA Baseline (2005) value} \times \$15 \text{ per metric ton} \\ &= (55,999 \text{ metric tons per year} - 32,878 \text{ metric tons per year}) \times \$15 \text{ per metric ton} \\ &= 23,121 \text{ metric tons per year} \times \$15 \text{ per metric ton} = \$346,816, \rightarrow \$400,000 \end{aligned}$$

This contribution will be used to pay for measures pursuant to the GHG Emission Reduction Program Guidelines, which include, but are not limited to, generation of green power from renewable energy sources, ship electrification, goods movement efficiency measures, cool roofs to reduce building cooling loads and the urban heat island effect, building upgrades for operational efficiency, tree planting for biological sequestration of CO₂, energy-saving lighting, and purchase of renewable energy certificates (RECs).

The timing of the payments pursuant to this mitigation measure shall be made by the latter of the following two dates: (1) the date that the Port issues a Notice to Proceed or otherwise authorizes commencement of construction on the project; or (2) the date that the Gerald Desmond Bridge Replacement Final EIR/EA is conclusively determined to be valid, either by operation of PRC Section 21167.2 or by final judgment or final adjudication.

NRDC-7:

The comment asserts that the EIR/EA does not consider an adequate range of alternatives based on failure to identify an alternative that reduces significant and unavoidable GHG impacts. Later the comment states, “The most important aspect of this alternative [an alternative that would reduce project GHGs] would be the reduction of the Port’s dependence on diesel trucks.” The project is a transportation infrastructure project designed to address the seismic performance and deterioration of the bridge, insufficient current and future roadway capacity, traffic operations, and navigational safety. The project does not create new vehicle trips (apart from temporary construction trips) and would not affect the origin or destination of goods received or shipped from the Port. No mention is made in the comment of trips using the bridge for purposes other than

container movement. In 2005, at the time of the NOP, it was estimated that 38 percent of all traffic on the Gerald Desmond Bridge had an origin or destination within the San Pedro Bay Ports (*Gerald Desmond Bridge Replacement Project Draft Traffic Analysis Report*, October 2009). This means that an estimated 62 percent of the bridge traffic was regional in nature, rather than port-related. That same study estimated that 25 percent of vehicles using the bridge were trucks and 75 percent were autos. Based on these figures, it is clear that the bridge serves both regional and local roles, and trucks, while constituting a substantial portion of traffic using the bridge, do not dominate its use.

As described in Final EIR/EA Chapter 3 Section 3.3, project-related increases in GHGs are associated with forecasted increased traffic demand that occurs with or without the project as shown in Final EIR/EA Table 3-3 (e.g., No Project also results in increased GHG emissions). Given the project's purpose and objectives set forth in Chapter 1, as well as the information regarding GHG emissions in Section 3.3 of the Final EIR/EA, the commenter's suggestion regarding an alternative that reduces the Port's dependence on diesel trucks, and the alternatives recommended on pages 10 to 11 of the comment letter do not constitute feasible alternatives to the project. The suggested alternatives would not improve the condition of the existing bridge, eliminate the need to rehabilitate or replace the existing bridge, or provide the additional capacity necessary to accommodate forecasted increases in both Port-related and regional traffic volumes that will occur with or without the project (Iteris, 2009).

The commenter also asserts that the EIR/EAR must consider a reasonable range of alternatives that avoids or substantially lessens this impact while feasibly attaining most of the projects objectives; however, instead of recommending such an alternative, the commenter recommends alternative container movement technologies. The Ports are already evaluating those technologies under their CAAP Alternative Technology Program, as noted in the comment. Those technologies focus narrowly on the smallest component of traffic within the project study area – intermodal trips. They do not address the project's objectives.

As previously discussed, these technologies are primarily focused on reducing intermodal trips ([http://www.portoflosangeles.org/DOC/Zero Emissions Container Mover System Pres_090607.pdf](http://www.portoflosangeles.org/DOC/Zero_Emissions_Container_Mover_System_Pres_090607.pdf)). Although the Port is committed to development and implementation of ZECMS, such implementation would have no effect on reducing truck use in the movement of 40 percent of the goods moved through the Port for ultimate distribution within the local region, as discussed in CSE-15. Goods within that local region are hauled by truck and will continue to be hauled by truck until movement of these goods by other means becomes economically feasible and/or operationally practicable.

Caltrans and the Port believe that the EIR/EA (see Sections 1.6, 1.7, and 1.8) has considered an appropriate range of alternatives to address both the purpose and need (see Section 1.1.2) of the project pursuant to NEPA and the project objectives pursuant to CEQA. Briefly, the purpose of the project is to provide a bridge that would: (1) be structurally sound and seismically resistant, (2) reduce approach grades, (3) provide sufficient roadway capacity to accommodate expected future demand, and (4) provide vertical clearance for safe passage of existing and future vessels beneath the bridge. In attempting to determine the appropriate range of alternatives to consider in the environmental document, 12 alternatives were considered, including a Toll-Operation Alternative, two Tunnel Options, two Bridge Design Options, two Horseshoe Interchange Variations, two Route 710 Interchange Variations, a Bridge Rehabilitation Alternative, and two Bridge Replacement Alternatives, in addition to the No Project Alternative. Of these, for reasons stated in EIR/EA Section 1.7, four alternatives were deemed worthy of being carried forward – No Project, a Bridge Rehabilitation Alternative, and two Bridge Replacement Alternatives. Both decisions – which alternatives to carry forward and which ones to no longer consider – were firmly governed by the alternative's ability to satisfy the project purpose and need. For those alternatives that were carried forward, they were examined at an equal level of detail in the EIR/EA.

The comment makes reference to mitigation measures "aimed at SCAQMD thresholds... [which] utilize technologies that decrease diesel fuel use and corresponding use of greenhouse gases," and goes on to state that "these measures can form the basis of an alternative project design aimed at improving the efficiency of ships, trucks, locomotives, and cargo-handling equipment..." None of the objectives noted in the comment, while intended to address the management of GHGs, would also address the primary purposes of the project, namely improving the seismic performance and forestalling further deterioration of the bridge and providing sufficient roadway capacity.

The comment goes on to offer up several technologies as alternatives that should be considered, including a magnetically levitated system, a linear induction motor system, and electric dual-mode trams. Systems using magnetic levitation to move vehicles may have some future potential (although not yet demonstrated) to be applied to the movement of cargo containers, and this could perhaps play a role in localized container movements within the Port complex, at some future date, if demonstrated to be technologically feasible, cost effective, and capable of handling high volumes of transfers. It is unclear how or why such a technology would be applied to traffic moving across the Gerald Desmond Bridge, however. Systems powered by linear induction motors, as the comment notes, could be used on railroad tracks. This may be a worthy technology to explore for the movement of rail traffic, but rail traffic does not use the Gerald Desmond Bridge. Electric dual-mode trams may perhaps offer some benefit in future applications, if and when they are demonstrated to function in a cost-effective manner, but such trams are not now available and their use, to be effective, would need to be implemented over a network of routes, not just the Gerald Desmond Bridge.

Again, it should be noted that all of the technologies that are identified by the commenter as "alternatives" in the comment are being evaluated separately for further development and implementation by the Ports through their CAAP Alternative Technology Program. However, once again, development and implementation of alternative container movement technologies is beyond the scope of the project and currently, although all of the recommended alternatives were considered more feasible and more ready, none of these alternatives address the project's purpose and need or project objectives, and none of these options are currently available for widespread use.

The Ports will continue to work towards implementation of ZECMS; however, implementation of ZECMS is not an alternative to the project or a reasonable or feasible mitigation measure that would substantially lessen or avoid project GHG emissions and is not currently technically or economically feasible. See also CSE-14 and CSE-15.

NRDC-8:

As discussed in EIR/EA Section 1.7.1 at pages 1-28 through 1-30, the Toll-Operation Alternative was not carried forward for detailed analysis in the EIR/EA because the *Terminal Island Traffic and Toll Revenue Study* (POLB 2005) (T&R Study) found that the alternative would cause a substantial traffic diversion that would cause additional adverse environmental consequences likely to be greater in magnitude than the impacts of the proposed project.

The rationale for not carrying the Toll-Operation Alternative forward that was provided in the EIR/EA was taken from the T&R Study prepared for the two San Pedro Bay Ports. The T&R Study evaluated tolling as a method of capital cost recovery. In the T&R Study, the new bridge was considered both as an independent tolled facility and also as part of a tolling district that would include tolling all three bridges providing access to Terminal Island (Gerald Desmond Replacement Bridge, Vincent Thomas Bridge and Schuyler Heim Bridge). Both tolling scenarios assumed tolls to be imposed on all autos and trucks using the facilities. The study concluded that all three bridges would need to be tolled, at similar rates; otherwise traffic would avoid the new bridge; therefore, tolling only the Gerald Desmond replacement bridge was removed from consideration.

Traffic analysis that assumed that the tolling district would be in place found the following traffic diversion effects attributable to toll avoidance:

(1) Traffic increases during peak periods would be experienced on the I-405, I-110, and SR 91 freeways, ranging from 3 to 5 percent on I-405 to as much as 20 percent in one direction on I-110, with peak-hour increases in trucks on I-110 up to 41 percent.

(2) Traffic decreases during peak periods would be expected on SR 710 (16 percent) and SR 47/103 (11 to 28 percent).

(3) Peak-period traffic increases would be expected on PCH and Anaheim Street (24 percent) and Ocean Boulevard/Seaside Avenue (40 to 45 percent).

Due to the traffic diversion effects noted above, additional travel lanes (54.8 lane-miles altogether) would be needed on the affected facilities. Such additions to the highway system would require substantial additional capital funding and the participation of multiple agencies, resulting in a program of improvements beyond the intended purpose and need associated with the bridge replacement project.

The required improvements on the local arterial streets would necessitate either on-street parking removal or street widening with attendant ROW impacts in some locations. On Anaheim Street, acquisitions affecting upwards of 50 apartment complexes, 50 businesses, 40 auto wrecking/repair yards, and encroachment into the Saints Peter and Paul School would occur. On PCH, 10 apartment complexes, 35 businesses, 30 auto wrecking/repair yards, Banning High School, and a Senior Citizen Community Center would be affected.

Because of the expected traffic diversion, required lane additions and attendant ROW impacts, the tolling option was dropped from further consideration.

All of the traffic diversion discussed in the EIR/EA assumes the imposition of tolls on all three bridges. The diversion resulting from tolling all three bridges is associated principally with regional traffic – traffic with neither an origin nor a destination on Terminal Island, but simply passing through the island. Some regional traffic passing through Terminal Island with free bridges is induced to avoid Terminal Island when tolls are imposed on the bridges. Little diversion of traffic with one trip end on Terminal Island results from tolling all three bridges because this traffic must cross one of the three bridges. The Final EIR/EA has been revised to clarify that the discussion of the traffic diversion and potential effects is diverted regional traffic with little impact on port traffic with a trip end on Terminal Island.

The commenter questions why diverted traffic could not be serviced by public transit. There is no evidence that such diversion would affect the modal distribution of those trips; however, assuming that additional transit service might affect the modal distribution and capture 5 percent of the diverted trips, that capture would not result in sufficient reduction of diverted vehicles to materially change the impacts to I-405, I-110, or SR 91. U.S. Census data show that approximately 5 percent of journey to work trips, the prevalent trip type during morning and evening peak hours, are by transit in the Los Angeles, Riverside, Orange County Consolidated Metropolitan Statistical Area (see <http://www.fhwa.dot.gov/ctpp/jtw/jtw8.htm>). A 10 percent transit capture of diverted trips is therefore unlikely but would result in transit capture of:

- 150 to -260 of the 1,500 to 2,600 autos diverted to I-405 if tolls were imposed;
- 350 of the 3,500 autos diverted to one direction of I-110 if tolls were imposed; and
- 200 of the 2,000 autos diverted to SR 91 if tolls were imposed.

Increased transit would have no impact on truck trips. Based on the conservative 10 percent potential transit capture identified above, the associated reduction in vehicles is still insufficient to change the mitigations identified in Section 1.7.1.2 of the Draft EIR/EA for the three roadways listed above. Those mitigations are an additional travel lane in each direction on I-405 between SR 710 and I-110, on I-110 south of SR 91, and on SR 91 between SR 710 and I-110.

As noted in Section 1.7.1.2 of the EIR/EA, the diverted traffic would create significant traffic impacts requiring capacity improvements along five roadways identified in Section 1.7.1.3 of the EIR/EA. Those impacts exceed the impacts of the Bridge Replacement Alternatives included in the EIR/EA. As the commenter points out, the tolling alternative decreases traffic along SR 710 and I-710 south of I-405; however, the Build Alternatives included in the EIR/EA do not have adverse/significant impacts on SR 710 or I-710. As noted in the response to NRDC-3, forecast traffic data for SR 710 and I-710 north of the project were examined in defining the traffic study area, and it was determined that these segments would not be adversely affected by the project. In summary, the Toll-Operation Alternative would have significant traffic impacts along five roadways and reduce traffic on a roadway where the Bridge Replacement Alternatives would not have significant traffic impacts. In electing not to carry the tolling alternative forward, substantial traffic impacts were avoided.

The commenter suggests that port-related heavy-duty trucks are responsible for deterioration of the existing bridge. While it is generally true that trucks and heavy vehicles are responsible for substantially more damage to roadways than passenger cars and lightweight vehicles, that observation is not relevant to the current condition of the Gerald Desmond Bridge. The reports cited in Section 1.1.2.2 of the EIR/EA (1989 Fatigue Memorandum, a 2002 Load Rating Report and a 2005 Inspection Report) indicate that rust and the presence of seawater are the major factors contributing to the bridge's deterioration. Rust and seawater are not a function of truck and heavy vehicle usage of the bridge. There has been some damage of some main span sway struts due to collisions with traffic, which is likely due to trucks because the sway struts are above the bridge's roadway and would be struck by vehicles exceeding the height limit. Other than this information, there is no evidence to suggest that "industry" has had a disproportionate impact on the bridge.

The Propeller Club of Los Angeles – Long Beach, Dated 2/23/2010

PCLA: Your comments are acknowledged and will be transmitted to the Board of Harbor Commissioners.

Southern California Environmental Health Sciences Center, Dated 3/22/2010

SCEHSC-1: The Port considers seriously its responsibility to comply with all applicable federal and State requirements concerning the management of hazardous waste and the potential adverse public health implications of exposure to such materials. LBP and asbestos abatement and handling requirements are heavily regulated and require procedures to be carried out by contractors certified in abatement specialties. The Port and Caltrans regularly encounter these issues on projects; therefore, they have long-standing experience with them. While very detailed and specific measures are prescribed for the removal, handling, transport, and disposal of hazardous materials encountered in the field, such measures typically are not recounted in the environmental document for a project so long as it is made clear that such procedures are in place and will be adhered to; such is the case with the Gerald Desmond Bridge Replacement Project. The general requirement to comply with all applicable State and federal laws will be referenced in the CEQA-required MMRP, and the details themselves will be incorporated into the contract specifications governing construction of the project; however, recognizing the level of concern raised in some of the commenter's more-detailed comments, provided below is an example of the specific requirements for LBP management, taken from the contract specifications for a similar project. Requirements similar to (and as stringent as) these will be incorporated into the construction contract documents to ensure compliance with all applicable State and federal laws. It should be noted that LBP is now prohibited in Caltrans specifications regarding bridge paint and yellow highway striping.

Debris/Water Containment and Collection Program

Prior to starting work, the Contractor shall submit a debris/water containment and collection program to the Engineer in conformance with the provisions in Section 01330,

"Shop Drawings/Submittals," of the General Requirements 5-1.02, "Plans and Working Drawings," of the Standard Specifications, for debris/water produced when the existing paint system is disturbed. The program shall identify materials, equipment, and methods to be used when the existing paint system is disturbed and shall include working drawings of containment systems, loads applied to the bridge by containment structures, and provisions for ventilation and air movement for visibility and worker safety.

If the measures being taken by the Contractor are inadequate to provide for the containment and collection of debris/water produced when the existing paint system is disturbed, the Engineer will direct the Contractor to revise the operations and the debris/water containment and collection program. The directions will be in writing and will specify the items of work for which the Contractor's debris containment and collection program is inadequate. No further work shall be performed on the items until the debris/water containment and collection program is adequate and, if required, a revised program has been approved for the containment and collection of debris/water produced when the existing paint system is disturbed.

The Engineer will notify the Contractor of the approval or rejection of the submitted or revised debris containment and collection program within 2 weeks of submittal of the Contractor's program or revised program.

Safety and Health Provisions

Attention is directed to Section 00308, "Injury and Illness Prevention – Safety Measures", of the General Conditions.7-1.06, "Safety and Health Provisions," of the Standard Specifications. Work practices and worker health and safety shall conform to the California Code of Regulations, Title 8, Construction Safety Orders, including Section 1532.1, "Lead."

The Contractor shall furnish the Engineer a written Code of Safe Practices and shall implement an Injury and Illness Prevention Program and a Hazard Communication Program in conformance with the requirements of Construction Safety Orders, Sections 1509 and 1510.

Prior to starting work that disturbs the existing paint system, and when revisions to the program are required by Section 1532.1, "Lead," the Contractor shall submit the compliance programs required in subsection (e)(2), "Compliance Program," of Section 1532.1, "Lead," of the Construction Safety Orders to the Engineer in conformance with the provisions in Section 01330, "Shop Drawings/Submittals", of the General Requirements. 5-1.02, "Plans and Working Drawings," of the Standard Specifications. The compliance programs shall include the data specified in subsections (e)(2)(B) and (e)(2)(C) of Section 1532.1, "Lead." The compliance programs shall be reviewed and signed by a Certified Industrial Hygienist (CIH) who is certified in comprehensive practice by the American Board of Industrial Hygiene (ABIH). Copies of all air monitoring or jobsite inspection reports made by or under the direction of the CIH in conformance with Section 1532.1, "Lead," shall be furnished to the Engineer within 10 days after the date of monitoring or inspection.

Debris Handling

Debris produced when the existing paint system is disturbed shall not be temporarily stored on the ground. Debris accumulated inside the containment system shall be removed before the end of each work shift. Debris shall be stored in approved, leak-proof containers and shall be handled in such a manner that no spillage will occur.

Disposal of debris produced when the existing paint system is disturbed shall be performed in conformance with all applicable Federal, State, and Local hazardous waste laws. Laws that govern this work include:

- A. Health and Safety Code, Division 20, Chapter 6.5 (California Hazardous Waste Control Act).
- B. Title 22; California Code of Regulations, Division 4.5, (Environmental Health Standards for the Management of Hazardous Waste).
- C. Title 8, California Code of Regulations.

Except as otherwise provided herein, debris produced when the existing paint system is disturbed shall be disposed of by the Contractor at an approved Class 1 disposal facility in

conformance with the requirements of the disposal facility operator. The debris shall be hauled by a transporter currently registered with the California Department of Toxic Substances Control using correct manifesting procedures and vehicles displaying current certification of compliance. The Contractor shall make all arrangements with the operator of the disposal facility and perform any testing of the debris required by the operator.

At the option of the Contractor, the debris produced when the existing paint system is disturbed may be disposed of by the Contractor at a facility equipped to recycle the debris, subject to the following requirements:

A. Copper slag abrasive blended by the supplier with a calcium silicate compound shall be used for blast cleaning.

B. The debris produced when the existing paint system is disturbed shall be tested by the Contractor to confirm that the solubility of the heavy metals is below regulatory limits and that the debris may be transported to the recycling facility as a non-hazardous waste.

C. The Contractor shall make all arrangements with the operator of the recycling facility and perform any testing of the debris produced when the existing paint system is disturbed that is required by the operator.

Work Area Monitoring

The Contractor shall perform work area monitoring of the ambient air and soil in and around the work area at the bridge site to verify the effectiveness of the containment system. The work area monitoring shall consist of collecting, analyzing, and reporting air and soil test results and recommending the required corrective action when specified exposure levels are exceeded. The work area monitoring shall be carried out under the direction of a CIH. The samples shall be collected at locations designated by the Engineer.

Air samples shall be collected and analyzed in conformance with National Institute for Occupational Safety and Health (NIOSH) methods. Air samples for lead detection shall be collected and analyzed in conformance with NIOSH Method 7082, with a limit of detection of at least $0.5 \mu\text{g}/\text{m}^3$. Air samples for detection of other metals shall be collected and analyzed in conformance with NIOSH Method 7300, with a limit of detection of at least one percent of the appropriate Permissible Exposure Limits (PELs) specified by the California/Occupational Safety and Health Administration (Cal/OSHA). Alternative methods of sample collection and analysis, with equivalent limits of detection, may be used at the option of the Contractor.

The airborne metals exposure, outside either the containment system or work areas, shall not exceed the lower of either: (1) 10 percent of the Action Level specified for lead by Section 1532.1, "Lead," of the Construction Safety Orders, or (2) 10 percent of the appropriate PELs specified for other metals by Cal/OSHA.

The air samples shall be collected at least once per week during progress of work that disturbs the existing paint system. All air samples shall be analyzed within 48 hours at a facility accredited by the Environmental Lead Laboratory Accreditation Program of the American Industrial Hygiene Association (AIHA). When corrective action is recommended by the CIH, additional samples may be required by the Engineer to be taken, at the Contractor's expense.

Soil samples shall be collected prior to the start of work, and collected within 36 hours following completion of cleaning operations of existing steel. Where the cleaning operations extend over large areas of soil or many separate areas of soil at each bridge site, the samples shall be collected at various times during the contract when determined by the Engineer. A soil sample shall consist of 5 plugs, each 19 mm {3/4 inch} in diameter and 13 mm {1/2 inch} deep, taken at each corner and center of a one square meter {1.2 square yard} area. Soil samples shall be analyzed for [listed contaminants] in conformance with Method 3050 in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW-846 published by the United States Environmental Protection Agency.

There shall be no increase in the concentrations of heavy metal in the soil in the area affected when the existing paint system is disturbed. When soil sampling, after completion of work that disturbs the existing paint system, shows an increase in the concentrations of heavy metal, the area affected shall be cleaned and re-sampled at the Contractor's

expense until soil sampling and testing shows concentrations of heavy metal less than or equal to the concentrations collected prior to the start of work.

In areas where there is no exposed soil, there shall be no visible increase in the concentrations of heavy metal on the area affected when the existing paint system is disturbed. Any visible increase in the concentrations of heavy metal, after completion of work that disturbs the existing paint system, shall be removed at the Contractor's expense.

Air and soil sample laboratory analysis results, including results of additional samples taken after corrective action as recommended by the CIH, shall be submitted to the Engineer. The results shall be submitted both verbally within 48 hours after sampling and in writing with a copy to the Contractor, within 5 days after sampling. Sample analysis reports shall be prepared by the CIH as follows:

A. For both air and soil sample laboratory analysis results, the date and location of sample collection, sample number, contract number, bridge number, full name of the structure as shown on the contract plans, and District-County-Route-Kilometer Post {Post mile} will be required.

B. For air sample laboratory analysis results, the following will be required:

1. List of emission control measures in place when air samples were taken.
2. Air sample results shall be compared to the appropriate PELs.
3. Chain of custody forms.
4. Corrective action recommended by the CIH to ensure airborne metals exposure, outside either the containment system or work areas, is within specified limits.

C. For soil sample laboratory analysis results, the concentrations of heavy metal expressed as parts per million will be required.

Containment System

At the option of the Contractor, the containment system shall consist of either (1) a ventilated containment structure, (2) vacuum shrouded surface preparation equipment and drapes, tarps, or other materials, or (3) an equivalent containment system. The containment system shall contain all water, resulting debris, and visible dust produced when the existing paint system is disturbed.

For bridges over water, the containment system shall include a skimming boom consisting of a float with a skirt to collect floating debris.

Modify clearances to agree with approved available dimensions.

Containment systems shall provide the clearances specified under "Maintaining Traffic" of these special provisions, except that when no clearances are specified a vertical clearance of 10.5 feet above invert of the Pacoima Wash Diversion Channel. 4.6 m {15 feet} and a horizontal clearance of 9.8 m {32 feet} shall be provided for the passage of public traffic. Falsework or supports for the ventilated containment structure shall not extend below the vertical clearance level nor to the ground line at locations within the roadbed.

Negative air pressure shall be employed within the ventilated containment structure and will be verified by visual methods by observing the concave nature of the containment materials while taking into account wind effects or by using smoke or other visible means to observe airflow. The input airflow shall be properly balanced with the exhaust capacity throughout the range of operations. The exhaust airflow of the ventilation system in the ventilated containment structure shall be forced into dust collectors (wet or dry) or bag houses.

Protective Work Clothing and Hygiene Facilities

Wherever there is exposure or possible exposure to heavy metals or silica dust at the bridge site, the Contractor shall, for City State personnel: (1) furnish, clean, and replace protective work clothing and (2) provide access to hygiene facilities. The furnishing, cleaning, and replacement of protective work clothing and providing access to hygiene facilities shall conform to the provisions of subsections (g), "Protective work clothing and equipment," and (i), "Hygiene facilities and practices," of Section 1532.1, "Lead," of the Construction Safety Orders, and will be required for no more than 3 people.

The protective work clothing and access to hygiene facilities shall be provided during exposure or possible exposure to heavy metals or silica dust at the bridge site and during the application of the undercoats of paint. Protective work clothing and hygiene facilities shall be inspected and approved by the Engineer before being used by City/State personnel. The protective work clothing shall remain the property of the Contractor at the completion of the contract.

BRIDGE REMOVAL (Partial text)

Removing bridges or portions of bridges shall conform to the provisions in Section 15-4, "Bridge Removal," of the Standard Specifications and these special provisions.

Bridge removal (portion) for the bridge (State Bridge No. 53C-1152) shall include, but not limited to the following as shown on the plans:

Removing existing horizontal cable restrainers, and steel anchorage plates, bolts and nuts on abutment concrete seats

The paint system on the existing steel girders and cross-frames consists of lead.

Removed materials that are not to be salvaged or used in the reconstruction shall become the property of the Contractor and shall be disposed of in conformance with the provisions in subsection 300-1.3, "Removal and Disposal of Materials," of the Standard Specifications for Public Works Construction and the Additions and Amendments.7-1.13, "Disposal of Material Outside the Highway Right of Way," of the Standard Specifications.

The Contractor shall submit a complete bridge removal plan to the Engineer for each bridge listed above, detailing procedures, sequences, and all features required to perform the removal in a safe and controlled manner. The bridge removal plan shall include, but not be limited to the following:

- A. The removal sequence, including staging of removal operations.*
- B. Equipment locations on the structure during removal operations.*
- C. Temporary support shoring or temporary bracing.*
- D. Locations where work is to be performed over traffic, utilities, or railroad property.*
- E. Details, locations, and types of protective covers to be used.*
- F. Measures to assure that people, property, utilities, and improvements will not be endangered.*
- G. Details and measures for preventing material, equipment, and debris from falling onto public traffic, channel, or railroad property.*

When protective covers are required for removal of portions of a bridge, or when superstructure removal works on bridges are involved, the Contractor shall submit working drawings, with design calculations, to the Engineer for the proposed bridge removal plan, and the bridge removal plan shall be prepared and signed by an engineer who is registered as a Civil Engineer in the State of California. The design calculations shall be adequate to demonstrate the stability of the structure during all stages of the removal operations. Calculations shall be provided for each stage of bridge removal and shall include dead and live load values assumed in the design of protective covers. At a minimum, a stage will be considered to be removal of the deck, the soffit, or the girders, in any span; or walls, bent caps, or columns at support locations.

Temporary support shoring, temporary bracing, and protective covers, as required, shall be designed and constructed in conformance with the provisions in Section 51-1.06, "Falsework," of the Standard Specifications and these special provisions.

SCEHSC-2: LBP removal requirements and risks to human health are well known and disclosed in the EIR/EA. The EIR/EA indicates that removal of LBP would be completed in accordance with all applicable federal and state laws and that such conditions will be included in the contract documents including oversight by a CIH. Prior to demolition of the bridge, bridge covering materials will be tested by a field engineer, and if such materials are determined to contain lead or lead-based compounds, such materials will be handled and disposed of in accordance with applicable regulatory procedures. See also response to SCEHSC-1.

SCEHSC-3: Protection of construction workers from exposure to LBP (and other hazardous compounds) is governed by Occupational Safety and Health Administration's (OSHA) Lead Standards, both General Industry and Construction, the Construction Standard (29 CFR 1926.62) and/or the General Industry Standard (29 CFR 1910.1025). As stated in

Section 2.2.2.3 of the EIR/EA, all applicable protective measures will be followed during bridge removal and construction activities. These requirements will be incorporated into the construction bid specifications. It should also be noted that materials covering the new bridge will not contain lead-based compounds; therefore, they will not pose a future hazard to bridge maintenance workers.

SCEHSC-4: Worker exposure to LBP during bridge demolition would not constitute, in and of itself, a significant adverse environmental impact requiring preparation of an EIS, particularly when applicable standard industry protective measures are considered. Those protective measures would provide adequate protection from such exposure, in conformance with applicable state and federal laws. In the case of the Gerald Desmond Bridge Replacement Project, the EIR/EA analyzed this issue and concluded that the impact will be less than significant so long as the requirements of all applicable laws are met. Please see also the response to NRDC-2, and SCEHSC-2, -3.

SCEHSC-5: As described in the EIR/EA (see Section 2.2.1.3), none of the Build Alternatives would require construction activities resulting in dredge or fill within the waters of the Back Channel; therefore, a CWA Section 404 permit from USACE is not required. Moreover, no dredged or fill materials will be placed into the water below the bridge. In addition, as referenced in the cited EIR/EA section, the potential for construction debris to affect waters below the bridge is acknowledged and is addressed. Contract specifications (see the response to SCEHSC-1 under “*containment*”) will require that all work that potentially disturbs the paint system be conducted so as to contain all water, resulting debris, and visible dust produced, and prevent such material from entering the surface waters beneath the bridge. A site-specific SWPPP will be implemented that will include appropriate construction site BMPs to ensure that no water quality standards or WDRs are violated. The SWPPP will address the following: erosion and sediment control, non-stormwater management, post-construction stormwater management, waste management and disposal, maintenance and repair of BMPs, employee training to perform inspections of BMPs at the project site, and an SAP for contaminated stormwater runoff. The SWPPP will describe the structural and non-structural BMPs to minimize or eliminate the potential for spills and leakage of construction materials and erosion of disturbed areas by water and wind. During demolition of the bridge, debris netting will be installed to capture material or debris that could fall from the bridge. There is also a list of additional BMPs that will be implemented to prevent debris from entering the surface water, sited in EIR/EA Section 2.2.1.3.

SCEHSC-6: Caltrans and the Port acknowledge the potential serious adverse health effects associated with exposure to lead and, potentially, chromate. Reference to such hazards are discussed in EIR/EA Section 2.2.3.3 where it is noted that buildings subject to demolition and the existing bridge may contain ACMs and LBP. The level of hazard is well understood, and accepted industry construction standards will be implemented as required by law to protect workers and the public from exposure to materials such as these and others that may be encountered during construction activities. As is noted in mitigation measures HM-1 through HM-8, the Port is required to and will investigate, identify, and manage hazardous materials encountered during construction of the proposed bridge project and demolition of the existing bridge. All required protective measures will be implemented in accordance with all applicable state and federal laws governing construction activities. Moreover, the standards and requirements in these laws were developed in response to the type of research cited in the comment. Regarding chromate, this compound was typically used on aircraft, not bridges, beginning in the late 1960s because of its high cost. Because the Gerald Desmond Bridge was completed in 1968, it is possible that chromate may be in the LBP used on the bridge. Mitigation measure HM-7 will result in a plan to address LBP and chromate, should either material be discovered in the course of field testing. (Please also see the responses to comment SCEHSC-3 and SCEHSC-8 below.) It should also be noted that in response to this comment, mitigation measure HM-4 was modified to include LBP screening in addition to screening for ACM. The requirement for LBP screening was discussed in the

text in Section 2.2.3.3, but it was inadvertently excluded from the text of HM-4. Revised text for measure HM-4 is provided below.

HM-4: The Port shall conduct a survey to screen for ACMs and LBP in all affected buildings and the bridge prior to any demolition activities. Identification of locations of buildings or structures containing ACMs and LBP will be clearly identified on the construction plans and incorporated into the project safety plan and hazardous waste management plan. Any disturbance/demolition of structures containing ACM or LBP will be completed in accordance with the contract specifications and all State, federal, and local laws and regulations.

SCEHSC-7: All of the regulations noted in Table 1 of the comment are referenced or discussed in Section 2.2.3.1. As is noted in EIR/EA Section 2.2.3.4, under mitigation measure HM-7, the construction contractor will be required to submit a Lead Compliance Plan, in accordance with CCR Title 8 Section 1532.1. This plan, and other contract specifications consistent with those provided in SCEHSC-1, will require the contractor to implement measures to demonstrate adherence to all applicable state and federal regulations for the handling, transportation, and disposal of lead, including the OSHA regulation cited in the comment.

SCEHSC-8: Caltrans and the Port acknowledge that the task of removing LBP, as well as other work associated with construction of the new bridge and the demolition of the existing bridge, involves potential exposure to hazardous materials and conditions. Accordingly, through the contract specifications that will apply to the project, the Port will require the contractor to comply with all applicable state and federal laws regarding worker and worksite safety. Regulations authored by the federal OSHA, which has a cooperative agreement with Cal-OSHA regarding occupational lead handling, among others, would apply to the bridge project construction practices. Reference to OSHA's *Pocket Guide for the Construction Industry* (Construction Safety Orders, Article 4. Dust, Fumes, Mists, Vapors and Gases, section 1532.1 - Lead; updated - July 9, 2007 [CSO]), reveals the following summarized requirements:

1. Before engaging in any work during which an employee may be exposed to lead, the employer must be thoroughly knowledgeable about the requirements of CSO 1532.1.
2. For each jobsite, the lead hazard must be assessed [1532.1(d)(1)].
3. Where lead is present, the following is required:
 - a. Lead dust must be controlled by high efficiency particulate air (HEPA) vacuuming, wet cleanup, or other effective methods [1532.1(h)].
 - b. Workers must be provided with washing facilities that are supplied with soap and clean water [1532.1(i)].
 - c. Workers must receive appropriate training [1532.1(l)].
 - d. The employer must implement a written compliance program to ensure control of hazardous lead exposures. [1532.1(e)].
 - e. The employer must provide the worker with and require the use of appropriate PPE [1532.1(e),(g)].

The CSO goes on to specify allowable exposure limits, describe "trigger tasks" that are identified as highly hazardous (as a result of their likelihood to create airborne exposure), describe the type of PPE that is required to be available and used, provides the text and posting requirements to identify the hazard, and other applicable requirements. Regulatory guidance for the management of all hazardous materials likely to be encountered during project construction and demolition activities, such as this portion of the CSO, will be made part of the construction specifications made available to the construction industry prior to accepting bids for the work.

- SCEHSC-9:** An offsite location has not been identified at the present time for removal of bridge sections or other components. The availability of such sites varies from time to time; therefore, it would be speculative to suggest that a particular site identified at the present time would be available at the time of construction several years from now. As construction approaches, a suitable site will be identified, and specifications and directives as to how that site would be managed will be prescribed. The decision regarding how bridge sections will be removed and transported offsite for general demolition purposes or purposes more specific to the handling of hazardous materials will be made at a later date when more information is available about a possible offsite location. Appropriate measures to ensure the safety of construction workers and the general public are required by law and will be enforced as part of the construction documents.
- SCEHSC-10:** Please see responses to SCEHSC-1 through SCEHSC-8 for additional information on this subject. As is noted in the response to SCEHSC-1, debris produced when the paint system is disturbed (i.e., wherein LBP is likely to be encountered) must be characterized in the field, temporarily stockpiled in an appropriate location that is separated from the rest of the worksite and is also located away from contact with anyone except certified construction workers, hauled off by a transporter currently registered with the California DTSC using correct manifesting procedures and vehicles displaying current certification of compliance, and then disposed of at an approved Class 1 facility. Appropriately trained and certified personnel, supervised by field engineers, will follow the established handling procedures for these and any other hazardous materials encountered during construction.
- SCEHSC-11:** Please see responses to SCEHSC-1 through SCEHSC-8. No additional mitigation is necessary beyond the requirements of applicable laws.
- SCEHSC-12:** Please see response to SCEHSC-2. The Port does not maintain a permanent staff with required technical training for this type of work; therefore, it regularly utilizes the services of outside professionals with specialized expertise to supplement its staff. See Chapter 5 of the EIR/EA for an example of the range of experts utilized by the Port to assist in the preparation of the EIR/EA. As indicated, the Port will utilize the services of an Industrial Hygienist certified in Comprehensive Practice by the ABIH.
- SCEHSC-13:** Because the project is jointly sponsored by the POLB and Caltrans, all applicable federal regulations, such as those referenced in the comment, will be followed.
- SCEHSC-14:** Consistent with 29 CFR 1926.62, contract specifications will require hygiene requirements for workers with the potential to come in contact with LBP dust. Standard requirements are for the contractor to provide disposable work clothes and access to showers. Section (g) of this regulation requires that employers potentially exposing employees to lead must do the following: (1) provide and assure that employees use appropriate protective work clothing (e.g., coveralls, gloves, hats, shoes, disposable coverlets, face shields, vented goggles) that protects the employee's garments at least weekly (daily, if exposure is above a specified level); (2) provide for the cleaning, laundering, and disposal of protective clothing; (3) provide for the repair or replacement of protective clothing; (4) ensure that all protective clothing is removed at the completion of a work shift only in change areas provided for that purpose; (5) assure that contaminated protective clothing is placed in a closed container (appropriately labeled); and (6) inform persons who clean or launder protective clothing of the potentially harmful effects of exposure to lead. 29CFR1926.62 provides comprehensive and thorough regulatory guidance on the management of lead to reduce the possibility of harm to employees and any others who may come in contact to an acceptable level.
- SCEHSC-15:** Lead is a regulated hazardous waste. Removal, handling, and disposal will be governed by the contract special provisions for the project. Such provisions require the contractor to take the following actions when hazardous waste (including lead) is encountered: (1) material shall be tested to determine if concentrations are such to qualify as hazardous waste regulated by the State of California; (2) material shall be transported to and

disposed of at a Class I disposal site, by a properly registered transporter, using a vehicle conforming to current certifications; (3) a Lead Compliance Plan (as referenced in the Standard Specifications) shall be prepared, approved, and followed, involving daily monitoring, analysis of samples, and describing procedures for handling, transporting, and disposal of such material. Any materials containing lead will be handled, stored, and disposed of in accordance with OSHA, RCRA, DTSC, and all other federal and State regulatory requirements. Areas and materials containing lead will be identified and managed in accordance with State and federal law. Quantities and locations of yellow thermoplastic striping and lead paint on the bridge or lead in the soil within the project limits will be delineated on the design plans. The construction engineer will be responsible for ensuring proper handling and disposal by the contractor.

SCEHSC-16: Caltrans special provisions regarding paints approved for use in bridge painting contain no LBPs. LBPs are an old method of reducing corrosion and are no longer used by the painting industry or allowed for use by Caltrans. Paint for the new bridge will not contain lead. Similarly, LBP is no longer permitted for use in yellow highway striping. Any new yellow striping will be lead free.

SCEHSC-17: As discussed in SCEHSC-1, the Port considers seriously its responsibility to comply with all applicable federal and State requirements concerning the management of hazardous waste and the potential adverse public health implications of exposure to such materials. Hazardous waste screening and characterization will be completed prior to construction, and abatement handling and disposal requirements for all hazardous waste, including asbestos and chromates, will be completed in accordance with all State and federal laws. The Port and Caltrans regularly encounter these issues on projects; therefore, they have long-standing experience with them, as evidenced by the example of the detail shown in the example contract specification in SCEHSC-1. For all hazardous waste encountered during the project, including chromates and LBP, a general requirement to comply with all applicable State and federal laws will be referenced in the CEQA-required MMRP, and the compliance details themselves will be incorporated into the contract specifications governing construction of the project.

Responses to Comments from Industry and Business

American Council of Engineering Companies, Dated 2/18/2010

ACEC: Your comments are acknowledged and will be transmitted to the Board of Harbor Commissioners.

Future Ports, Dated 3/22/2010

FP(A)-1: Your comments are acknowledged and will be transmitted to the Board of Harbor Commissioners.

FP(A)-2: Decisions regarding sources of construction materials or locations for debris hauling and disposal, including potentially contaminated water, soil, and other construction materials will be determined by the contractor as part of the contracting process and in accordance federal and State laws and local regulations; however, minimizing unnecessary travel distance is an objective that is shared by the Port and will be reflected in the bidding process.

FP(A)-3: As discussed in EIR/EA Section 2.1.4, recycling of construction materials will be managed consistent with the City of Long Beach Construction and Demolition Program. The contractor for the project will be required to complete/implement a waste management plan in accordance with the City of Long Beach Ordinance (Municipal Code Chapter 18.97) requiring certain demolition and/or construction projects to divert at least 60 percent of waste either through recycling, salvage, or deconstruction. Recycling of usable materials is an objective shared by the City and the Port.

FP(A)-4: The contractor will determine where materials will be recycled based on the construction bid process.

FP(A)-5: The section that is referenced in the comment is a discussion of the existing or affected environment for purposes of the air quality analysis. The Environmental Consequences section includes a discussion and data about the type of emissions considered, including PM exhaust emissions, and brake wear and re-entrained road dust, which include copper and zinc as byproducts. The amounts expected from the added capacity provided by the new bridge would be approximately 8 ounces per year for each element, or approximately 0.03 ounces per day. When compared to baseline conditions (21 pounds per year for copper and 8 pounds per year for zinc), the project-related contributions would be on the order of 2.4 percent and 6.2 percent, respectively. Control of materials resulting from tire and brake wear is within the purview of federal (EPA) and state (CARB) regulators; the proposed bridge replacement project is not capable of influencing the localized production of those elements. A portion of the copper and zinc would be deposited on the roadway surface. As is acknowledged in EIR/EA Section 2.2.1.3, runoff that would contain these materials would flow along gutters toward the ends of the bridge and discharged into biofiltration swales and media filters, prior to entering the storm drain system. This will prevent some (and perhaps most) of the deposited copper and zinc from entering surface waters beneath the bridge.

In addition, the referenced section includes a discussion about the general impact of the CAAP in reducing all air pollutants, but it does not discuss the impact on individual pollutants. A separate section under the "Local Plans and Regulations" provides a brief description of the CAAP and its impact on improving air quality in the Port region.

FP(A)-6: The comment requests an Accident and Terrorist Assessment of the preferred alternative. As discussed in Section 2.2.4.2 of the EIR/EA, an Accident and Terrorist Vulnerability Study is required if one of the Bridge Replacement Alternatives is selected. This requirement has been imposed as mitigation measure HS-1.

FP(A)-7: The referenced Measure GHG-1 addresses mitigation for project-level GHG emissions. The GHG emissions were calculated using the projected traffic conditions for project alternatives (including No-Action Alternative). The analysis used all relevant traffic information (i.e., VMT, average speed, emission factors) for passenger car and truck

traffic on each segment of the project corridor and summed to estimate the project corridor emissions. Furthermore, as the traffic data presented in Tables 2.2.5-11 and 2.2.5-12 of the Draft EIR/EA show, the truck volumes for Bridge Replacement Alternatives, compared to the No-Action Alternative, would increase in some segments and decrease in other segments within the project corridor. As such, the results are based on an adequate analysis of the GHG emissions for project alternatives

FP(A)-8: As discussed in Section 2.2.2 of the EIR/EA, the Bridge Replacement Alternatives will be designed to withstand the Safety Evaluation Earthquake with only minor damage so that the bridge could be returned to service within weeks. No substantial damage to the bridge from a tsunami is anticipated, based on 2007 Port studies. Finally, structure protection and security measures recommended in the Accident and Terrorist vulnerability study will be implemented to minimize both the likelihood and potential for damage of such events.

FP(A)-9 Your comments are acknowledged and will be transmitted to the Board of Harbor Commissioners.

Harbor Association of Industry & Commerce, Dated 3/11/2010

HAIC: Your comments are acknowledged and will be transmitted to the Board of Harbor Commissioners.

Harbor Truckers for a Sustainable Future, Dated 2/24/2010

HTFSF: Your comments are acknowledged and will be transmitted to the Board of Harbor Commissioners.

Intermodal Association of North America, Dated 4/16/2010

IANA: Your comments are acknowledged and will be transmitted to the Board of Harbor Commissioners.

Long Beach Generation LLC, Dated 3/22/2010

LBG-1: Your comments are acknowledged and will be transmitted to the Board of Harbor Commissioners. Responses to detailed comments are provided below.

LBG-2: The EIR/EA has compared the three Build Alternatives and the No Build Alternative and has concluded: (1) the No Build Alternative does not satisfy the project purpose and need; (2) the North-side and South-side Alignment Alternatives, when compared with the Rehabilitation Alternative, better satisfy the project purpose and need because they better provide for future traffic demand; (3) the environmental effects associated with the North-side and South-side Alignment Alternatives (both during construction and operation) are reasonably equivalent; and (4) the North-side Alignment Alternative is more cost effective than the South-side Alignment Alternative. Accordingly, the North-side Alignment Alternative has been selected as the preferred alternative for purposes of the environmental review. Recognizing that this choice has consequences for several owners of private property (including Long Beach Generation), each affected property owner will be consulted if the Board of Harbor Commissioners approves the North-side Alignment Alternative, and as final design information becomes available, regarding the details of the required acquisition and associated mitigation measures that may be applied to each site-specific circumstance.

LBG-3: The elevation of the new Gerald Desmond Bridge, as well as of the associated roadway connectors (near the LBGS Units) will be higher than the elevation of the LBGS inlet facilities; thus, pollutants from the vehicular traffic on the new Gerald Desmond Bridge will be emitted at higher elevations than the inlet facilities of the LBGS Units; therefore, it is expected that increase in pollutant concentrations at the inlet facilities of the LBGS Units from vehicular traffic on the new Gerald Desmond Bridge would be minimal. In addition, filtration systems provided as part of the inlet facilities, and other pollution

control systems installed at the LBGS will further reduce emissions at the LBGS stacks. Thus, minimal increase in pollutant concentrations at LBGS inlet facilities from vehicular traffic on the new Gerald Desmond Bridge is not expected to create any problems in meeting the LBGS facility Title V permit conditions (emission-related conditions). It is also anticipated that truck emissions will be declining over time as a result of implementation of the Port's CTP.

LBG-4: In 2003, Long Beach Generation raised this same comment during the scoping process for the first Draft EIR/EA. In response, an HRA was conducted by ENVIRON, an air quality consultant (*Draft EIR/EA: Gerald Desmond Bridge Replacement Project - Appendix B*; June 2004). This HRA was conducted following the detailed risk assessment techniques prescribed by SCAQMD for Rules 1401 and 212 for acute exposure. Atmospheric dispersion modeling was conducted to determine the maximum 1-hour concentration of TACs from the facility based on generally accepted modeling practices and modeling guidelines from EPA and SCAQMD, using the ISCT3 dispersion model. Both carcinogenic and non-carcinogenic compounds were identified, emanating from the facility's seven combustion turbine generators, emitted through five individual stacks. A fine grid of receptors was selected for evaluation, representing persons traveling on the bridge. A row of receptors was placed along the closest edge of the bridge to the facility and two others were placed next to the first row to represent two additional traffic lanes. These data were inputted to the CAPCOA AB2588 model; this model provides conservative algorithms to predict relative health risks from exposure to carcinogenic and chronic/acute non-carcinogenic compounds; acute non-carcinogenic compounds were used for the analysis. The results of the above procedure indicated that the maximum total acute hazard index was estimated to be 0.0043 for the respiratory endpoint. This is well below the established significance threshold value of 1.0; therefore, it was concluded that acute health effects from the LBGS facility would not result in adverse acute health effects for travelers along the proposed new bridge.

Los Angeles County Business Federation, Dated 4/7/2010

LCBF: Your comments are acknowledged and will be transmitted to the Board of Harbor Commissioners.

The Los Angeles Customs Brokers & Freight Forwarders Association Inc., Dated 3/11/2010

LACB&FFA: Your comments are acknowledged and will be transmitted to the Board of Harbor Commissioners.

Mobility 21, Dated 3/17/2010

M21-1: The Port acknowledges and concurs with the comment that implementation of this key project will advance the goals and objectives of the Multi County Goods Movement Action Plan (MCGMAP).

M21-2: As the project moves forward into the design and construction stages, continued coordination with the public and all stakeholders regarding project schedule and status including, but not limited to, major construction activities and construction detours, will be conducted.

M21-3: The EIR/EA provides comprehensive disclosure and analysis of the direct, indirect, and cumulative impacts of the proposed project and incorporates all feasible mitigation measures to avoid or substantially reduce potential project effects. The proposed project would have no substantial impacts and supports the goals and objective identified in the MCGMAP.

National Retail Federation, Dated 3/22/2010

NRF-1: Your comments are acknowledged and will be transmitted to the Board of Harbor Commissioners.

Plains West Coast Terminals, Dated 3/11/2010

- PWCT-1:** Plains West Coast Terminals, LLC (PWCT) will be added to the Port's distribution list for the project, and all correspondence will be sent to Mr. Thomas J. McLane at 5900 Cherry Avenue, Long Beach, CA 90805-4408.
- PWCT-2:** All references to the subject property at 2685 Pier S Lane will be revised in the document from Pacific Pipeline System, LLC to PWCT.
- PWCT-3:** Although not specifically referenced in the EIR/EA, the BP lines 82, 83, and 95 are included in the utility plans for the project. Line 95 is a 42-in. oil line owned by ConocoPhillips and operated by BP. Lines 82 and 83 are currently not in direct conflict with the alignment for the preferred alternative. Line 95 is included within utility plans; however, potential impacts to this line and the need to relocate or protect the line in place is still being determined. The utility identification process is ongoing, and the Port will work with PWCT during the design phase of the project to ensure that all utilities potentially affected by the project have been identified, located, and either relocated or protected in place.
- PWCT-4:**
- a.** Based on a review of the project reference drawings and plans, no information is available regarding an existing 30-in. water main on the north side of the existing bridge; however, there is a 24-in. Long Beach Water District (LBWD) line in Pier T Avenue south of Ocean Boulevard and the Gerald Desmond Bridge. The 24-in. LBWD line has a 16-in. branch that goes north towards NRG and the Plains tank farm. The 16-in. LBWD line is just east of the existing BP lines 82 and 83. The 24-in. LBWD water main and the 16-in. branch line are not in direct conflict with the alignment for the preferred alternative. The utility identification process is ongoing, and the Port will work with PWCT during the design phase of the project to ensure that all utilities potentially affected by the project have been identified, located, and either relocated or protected in place.
 - b.** Based on a review of the project reference drawings and plans, the existing firewater line at the cooling water intake structure is outside of the project area and is not in direct conflict with the alignment for the preferred alternative.
- PWCT-5:** Please see the response to comment LBG-2, above, for the rationale supporting the identification of the North-side Alignment Alternative as the preferred bridge alignment for purposes of completing the environmental review. Your comments regarding the alternatives will be transmitted to the Board of Harbor Commissioners for consideration in assessing the various alternatives. Responses to detailed sub-comments are provided below.
- a, b, c.** Clearly one of the highest priorities for the project will be to provide adequate protection from a potential terrorist attack. As is noted in the EIR/EA (Section 2.2.4.2), an analysis of accident and terrorist vulnerability for the new bridge has been recommended by the Gerald Desmond Bridge TAP and mitigation measure HS-1 requires initiation of an Accident and Terrorist Vulnerability Assessment and incorporation of recommendations during final design. This study will address such topics as anti-terrorist design modifications, security and hardening measures, security systems, etc. The Port acknowledges that your site contains facilities that could be particularly susceptible to harm and potentially serious consequences, including the potential for interaction among the crude oil, natural gas, and high-voltage lines identified in the comment. If the North-side Alignment Alternative is approved by the decision makers, the design team will meet with you during the final design process to obtain more details about your onsite facilities to be sure that the Accident and Terrorist Vulnerability Assess appropriately reflects the potential risks to your facilities and adequate means of protection is incorporated into the bridge design such that the potential for off-bridge consequences is minimized.
 - d.** The extreme earthquake referenced in the comment that could result in catastrophic collapse is purely speculative. Though no one can state with certainty that any particular structure will never collapse, adherence to such stringent design criteria described below

is deemed adequate by the State of California for all bridges, whether in close proximity to another structure or not.

The proposed bridge structure will be designed in accordance with established criteria for two levels of earthquake: (1) the lower intensity “functional evaluation earthquake” – a reasonable earthquake for which the bridges should behave elastically and not sustain any damage, and: (2) a maximum intensity “safety evaluation earthquake,” for which the bridge should not collapse. This earthquake is called by Caltrans the “Maximum Credible Earthquake” and is defined by the maximum envelope of two calculations:

- The largest earthquake with a probability of 95 percent of not being exceeded in 50 years, which is equivalent to a probable return period of 975 years, based on the record of past earthquakes from different sources.
- The largest physically plausible earthquake based on nearby subsurface fault rupture geometry based on established known active faults.

The performance criteria established for the project go beyond those required for ordinary bridges by further limiting the level of accepted damage under the maximum earthquake condition. The California Highway Design Manual states that the minimum lateral clearance from a building to an elevated structure is 15 ft (Art. 309.4).

It should also be noted that the design of the new bridge exceeds all State and federal SDC for bridges and uses state-of-the-art modeling techniques. It is unlikely that the referenced facilities would even withstand such a large quake, and thus analysis of collapse on the referenced facilities also is purely speculative.

e. Please see the response to comment LBG-2, above, for the rationale supporting the selection of the North-side Alignment Alternative as the preferred bridge alignment to move forward into final design if approved by the Board of Harbor Commissioners. The commenter’s preference for the South-side Alignment Alternative will be presented to the Board.

PWCT-6: Based on the current utility files for the project, the two 24-in. Plains lines are not within the Gerald Desmond Bridge Replacement Project area; however additional plans were previously requested from PWCT for facilities around the Plains tank farm to update the files as necessary, but PWCT has not yet provided the requested files. As coordination with SCE on the transmission line relocation progresses, additional utilities may be identified for relocation including, but not limited to, the two referenced 24-in. pipelines. If necessary and when appropriate, the lines will be included for SCE layout and planning of potential relocations. Any relocation need or potential project effect on these lines will be coordinated with PWCT and SCE during the final design phase of the project.

Port Petroleum Inc., Dated 3/17/2010

PP-1: The comment is acknowledged; a detailed response is provided below.

PP-2: If the North-side Alignment Alternative is approved by the Board of Harbor Commissioners, the Port and Caltrans will be developing the project in much more detail; however, during development of the current geometric designs, alternative ramp alignments/locations were considered. Some of the alternative concepts considered included similar configurations/locations to those suggested in the comment. These alternative configurations were dropped from further consideration because of the extensive conflicts with existing and planned rail and local roads, including Pier D Street and Pico Boulevard. The design of the loop ramp was developed as shown in the preliminary plans because it: (1) was able to meet Caltrans Design Standards, providing sufficient length to allow for a standard roadway profile, with an acceptable ascending slope (6 percent) necessary to gain elevation from Pico Avenue to join the proposed SB to WB elevated freeway ramp (SB to EB connector); and (2) minimizes ROW conflicts and impacts on existing and planned Port operations and local and regional circulation.

Additional discussion regarding major conflicts with the referenced Options 1 through 3 is provided below.

- Option 1: The first option conflicts with existing and proposed rail, as well as the intersection spacing of the realigned entrance ramp and Pier D Street.
- Option 2: The second option of extending ramp to the existing ramp presents design issues due to the 60-ft elevation difference between the existing entrance ramp and the proposed elevated freeway connector ramp, as well as the requirement to clear the realigned Broadway Street.
- Option 3: The third option includes similar conflicts with existing and proposed rail as Option 1. This option would also present additional conflicts with the existing SR 710, Channel 3, and the proposed I-710 project.

The Port will continue to coordinate with Port Petroleum and all affected tenants/property owners during the final design phase. As identified during final design and through continued coordination with affected tenants/property owners, the Port will consider minor refinements in the project that could reduce costs and minimize the need for property acquisition/relocations.

Retail Industry Leaders Association, Dated 3/22/2010

RILA: Your comments are acknowledged and will be transmitted to the Board of Harbor Commissioners.

Southern California Edison, Dated 3/22/2010

SCE-1: Your comments are acknowledged and will be transmitted to the Board of Harbor Commissioners; detailed responses are provided below.

SCE-2: If the project is approved, additional coordination between Caltrans, the Port, and SCE will occur during the final design phase of the project to resolve issues associated with the relocation of the 220-kV line.

SCE-3: The project would require relocation of many utilities within the project area, not all of which are shown on figures or discussed specifically within the EIR/EA; however, all requirements will be known during the design phase of the project and all utilities affected by the construction or operation of the preferred alternative will require relocation or protection in place. Utility coordination is an iterative process, completed throughout the project development and design phases. The Port will continue to work with SCE to identify utility relocation requirements including, but not limited to, the 66-kV line referenced in the comment. A summary of the utility coordination with SCE is provided below.

All SCE overhead and underground facilities have been added to the project utility plans based on reference drawings for SCE facilities provided to the Port by SCE on 5/23/07, 2/10/09, and 3/12/09.

The Port then provided SCE with electronic files containing all existing SCE facilities, existing topography, aerial photography, existing utilities, and layout for the preferred alternative, including location of the foundations, profiles, connectors, and ramps. The files were submitted to SCE in November 2009, and updated files were submitted in February 2010.

Waterfront Coalition, Dated 2/16/2010

WC: Your comments are acknowledged and will be transmitted to the Board of Harbor Commissioners.

Responses to Comments from Individuals

David J. Barboza, Dated 3/16/2010

DB: Please see responses to LBDS-3 through LBDS-8.

Nicole Bissonnette, Dated 3/18/2010

NB-1: As described in the EIR/EA, the existing bridge is currently heavily congested and will only become more so in the future. This congestion has resulted in a diversion of traffic in the project vicinity from Ocean Boulevard to other parallel routes in the area. Subsequent to construction of the new bridge, the traffic would likely remain on Ocean Boulevard to gain access to SR 710 instead of diverting to other local roads. Based on the POLB Traffic Model, it was estimated that completion of the bridge replacement project would result in a 2.2-minute reduction in travel time for motorists within the project area.

NB-2: The existing bridge, although it needs to be replaced or rehabilitated, is currently safe for use by the traveling public. As described in the EIR/EA, the Gerald Desmond Bridge underwent a partial seismic retrofit in 1993, and it is regularly inspected for structural safety. The preferred alternative would be designed to withstand a major seismic event with only minor damage allowed so that the bridge could be returned to service within weeks. Please also see also response to FP(A)-8.

Mercedes Broughton, Dated 3/1/2010

MB: Your comments are acknowledged and will be transmitted to the Board of Harbor Commissioners.

Sue Castillo, Dated 3/18/2010

SC: Please see responses to LBDS-3 through LBDS-8.

Robert Curtis, Dated 3/4/2010

RC-1: Please see responses to LBDS-3 through LBDS-8.

RC-2: Thank you for your suggestion regarding energy savings. During the final design process, measures to reduce energy consumption will be considered for inclusion in the bridge's design and operation.

Gerard T. Desmond, Dated 3/4/2010

GD: At this time, it has not been determined whether the new bridge would retain its existing name if it is replaced or realigned.

Alexis M. Dragoon, Dated 3/1/2010

AD: The architectural design was completed by the Danish firm of Dissing & Weitling.

Drew, Dated 3/10/2010

D-1: Your comment is acknowledged; detailed responses are provided below.

D-2: Please see responses to LBDS-3 through LBDS-8.

D-3: Access for bicycles will be maintained as noted in the comment. As shown in the EIR/EA (see Exhibit 2.1.5-13), continued access for bicycles on Ocean Boulevard presents a complex set of safety issues that require the seemingly circuitous route. Safety issues with continuous EB and WB bicycle access along Ocean Boulevard are discussed below:

For WB Ocean Boulevard, on the west side of the Los Angeles River, 5 percent grades begin and continue to the crest of the bridge. The incline will result in reduced speeds for cyclists until reaching the crest of the bridge. Approximately 1,500 ft west of the Los Angeles River, the SR 710 connector and the Pico Avenue on-ramp will join Ocean

Boulevard. Continuous access would require cyclists to merge across three lanes, on a 5 percent incline, to reach the 10-ft-wide shoulder. By having cyclists access the new bridge from the Pico Avenue on-ramp, they can remain within the shoulder the entire length of the bridge and eliminate merging across three lanes of high-speed traffic.

For EB Ocean Boulevard, continuous access in the EB direction would be the same, but in the reverse direction. For a cyclist to continue on Ocean Boulevard across the Los Angeles River, the cyclist would be required to merge from the shoulder across three lanes of traffic to reach the ramp to Ocean Boulevard. By having cyclists continue on Ocean Boulevard by first exiting on the Pico Avenue off-ramp, they can remain within the shoulder the entire way across the bridge and eliminate merging through three lanes of high-speed traffic.

D-4: Please see response to D-3.

Ken Fredrickson, Dated 3/21/2010

KF(A): Your comments are acknowledged and will be transmitted to the Board of Harbor Commissioners.

Jane Kelleher, Dated 2/26/2010

JK-1: As described in the EIR/EA (see Section 1.1.2.2), neither the No Build nor Rehabilitation Alternatives would provide the additional capacity that is needed to accommodate expected future demand.

JK-2: As described in EIR/EA Section 1.1.1.2.2 and Table 1-1, only 38 percent of all traffic using the existing bridge in 2005 had an origin or destination within the Ports of Long Beach or Los Angeles; 25 percent of daily traffic was trucks. By the year 2030, the proportion of trucks is forecast to grow to 44 percent of daily traffic using the bridge irrespective of whether the bridge is replaced. Both of the San Pedro Bay Ports are engaged in long-term planning and projects that will result in a greater modal shift of goods from trucks to rail, thereby reducing the number of trucks used to haul containers and increasing goods movement efficiency; however, trucks will remain an important component of goods movement. As described in CSE-15, it is not currently feasible to ship the 40 percent goods destined for the local region via rail for financial and operational reasons. Furthermore, it should be noted that although the bridge is forecast to convey a large number of trucks, 39 percent of traffic forecast for year 2030 is expected to be regional trips with neither an origin nor destination on Terminal Island.

JK-3: See response to JK-2. Both Ports are pursuing long-term planning and projects to increase the amount of containers being moved by rail, which would use the Alameda Corridor.

JK-4: After bridge replacement, larger ships would be able to pass under the bridge; however, the Back Channel navigational constraints (depth and width) will remain the same, precluding vessels larger than 8,000-8,999 TEUs (see Final EIR/EA Section 2.1.2.3) until such time as those constraints are removed. Replacing the bridge alone would not allow access for the "megacontainer" ships referenced in the comment. Additionally, also described in Section 2.1.2.3, the project would have no measureable impact on Port throughput capacity based upon the characteristics of the terminal areas upstream of the bridge. Regarding pollution associated with truck pollution; all trucks servicing port terminals must meet 2007 emission standards and are estimated to reduce Port-related truck pollution 80 percent by 2012. In addition, the Ports are aggressively working to reduce vessel emissions. In 2006, the Ports of Los Angeles and Long Beach jointly promulgated the *San Pedro Bay Ports Clean Air Action Plan*, which included, among other measures, a Control Measure aimed at reducing at-berth emissions from ocean-going vessels (OGVs). In 2010, a draft update of this plan was prepared and is undergoing review. The above-referenced control measure, identified as OGV2, is included in the draft update. This measure was initiated in 2004, and in 2007 the POLB

installed its first shore-powered berth. More shore-powered berths are programmed for phasing in by 2013. CARB regulation now requires 50 percent of all container, cruise, and reefer vessels to use shore power by 2014. The use of shore power will reduce OGV hotelling emissions of DPM, NO_x, and SO_x by 95 percent per vessel call. CARB regulation requiring cleaner fuels in OGV will reduce the referenced bunker pollution even further.

JK-5: Please see response to JK-2.

JK-6: As discussed in JK-2, the Bridge Replacement Alternatives will serve Port and non-Port traffic. The commenter did not provide any background information about what was meant by the "electric lanes" suggestion for the bridge. A "Google search" of "electric lanes" revealed no locations or related technology with this name; however, assuming the comment is referencing a future transportation system that uses an advanced car or a modification to existing cars to receive power from an electrified roadway for propulsion, the technology for such a project at this juncture has not been developed to the point that it would be feasible. However, if it were to become feasible in the future, it could certainly be considered for incorporation into the project area. The Port and ACTA are currently assessing similar types of technologies for trains that utilize existing and modified rail infrastructure; however, feasibility for Port application is still being investigated. Please see the response to related comments CSE-14, CSE-15, CSE-28, and NRDC-7 regarding implementation of alternative technologies being considered for use at the Ports.

Michael J. Meichtry, Dated 3/20/2010

MMei: Please see responses to LBDS-3 through LBDS-8 and D-2 and D-3.

Jessica Mickelson, Dated 3/1/2010

JMi: Please see responses to LBDS-3 through LBDS-8 and D-2 and D-3.

Ted J. Olson, Dated 2/26/2010

TO: Your comments are acknowledged and will be transmitted to the Board of Harbor Commissioners

Andrew Reed, Undated (received 3/19/2010)

AR: Please see responses to D-2 through D-3 and LBDS-3 through LBDS-8.

Tony Rivera, Dated 2/27/2010

TR-1: The Bridge Replacement Alternatives include three traffic lanes with 10-ft-wide shoulders.

TR-2: Caltrans District 7 is the lead federal agency for both the Gerald Desmond Bridge Replacement Project, as well as the I-710 expansion project. Additionally, the Port's engineering staff has been coordinating the Gerald Desmond Bridge Replacement Project design with the PDT for the I-710 expansion project.

TR -3: Increases or decreases in container volumes are directly related to the demand (need) for goods at the local, state, regional, and national levels. As described in Final EIR/EA Section 2.1.2.3, the Bridge Replacement Alternatives would have no measureable effect on either the Port's maximum cargo capacity or on projected market demand. The project would not allow the referenced "mega ships" to access terminals in the Inner Harbor (see JK-4 above). Additionally, it should be noted that both Ports committed to modal shifts from truck to rail wherever feasible (see CSE-15d). Please see the response to JK-2 above.

TR -4: Please see response to JK-4.

TR -5: Please see the responses to comments CSE-14, CSE-15, CSE-28, and NRDC-7. At this time, rail electrification is not economically or functionally feasible to replace diesel locomotives. The Port has several studies underway to further investigate rail electrification.

Ron Smith, Dated 3/1/2010

RS: Please see the response to similar comments from the City of Long Beach Development Services (LBDS-3 through LBDS-8).

Bruce D. Sutherland, Dated 3/3/2010

BS: At this time, Caltrans and the Port have determined that bicyclists will not be prohibited from using the proposed bridge; however, as previously discussed, the bridge will be adopted into the SHS, and consistent with CVC Section 21960, Caltrans has the authority to prohibit future bicycle access within the project area. Please see response to similar comments LBDS-3 through LBDS-8 and D-2 and D-3.

Amy Tingirides, Dated 3/18/201

AT-1: The Port continues to pursue additional funding from various federal, State, regional, and local sources. Some of the programs being considered are various annual federal transportation appropriations, future Metro calls for projects, additional California SHOPP funds, and the deferred 2009 Surface Transportation Authorization Act. Please also see response to CSE-20a.

AT-2: The potential use of a public private partnership funding mechanism is being considered for this project.

AT-3: The Port has considered other private funding mechanisms for this project, such as tolls and cargo fees. For a variety of technical and commercial reasons, neither of these options has been considered viable. The Port is open to other ideas involving private funding, but no acceptable plan has been proposed to date.

AT-4: Regulatory restrictions on public agencies make it difficult for the Port to pursue the method of procurement suggested by the comment. Additionally, the Port studied many alternative types of bridge designs, and the cable-stayed structure type was chosen because it could provide the desired landmark bridge design and was one of the most cost-effective bridge types considered for a bridge of this magnitude. If the proposed project is approved, the Port will investigate other cost-saving possibilities in at least two formal value engineering workshops at prescribed milestones throughout the final design process.

Marie Trotter, Dated 2/22/2010

MT: As described in EIR/EA Section 1.1.2.2, the need for replacing the Gerald Desmond Bridge is that it is functionally obsolete and seismically deficient. The term "aging" is used to denote that it has exceeded its useful life and can no longer efficiently accommodate either current or forecasted travel demands.

Jack Volkov III, Dated 2/23/2010

JV: As described in EIR/EA Section 2.1.5.3, the existing bridge will be open to traffic during construction while the new bridge is being constructed. Subsequent to opening the new bridge, the existing Gerald Desmond Bridge will be demolished.

Brian Wolfe, Dated 3/10/2010

BW: The current architectural design was completed by the Danish firm Dissing & Weitling, which was selected as part of the entire bridge engineering/design team. The Port's consultant team was selected pursuant to a competitive process. In July 2001, the Port

issued a Request For Qualifications for professional services for the Gerald Desmond Bridge Replacement Project, seeking to identify and place under contract a world-class team of consultants. Based on the Port's review, in July 2001, the best-qualified firms/teams were issued a Request for Proposal for outside consulting services for preliminary engineering, environmental documentation, and ROW support services. Four teams from the RFP process were interviewed. The winning team was the Parsons/HNTB Joint Venture team, which included the Danish architectural firm of Dissing & Weitling.

Kumars Zandparsa, Dated 3/23/2010

KZ: Your comments are acknowledged and will be transmitted to the Board of Harbor Commissioners.

Responses Public Hearing Comments – February 17, 2010

Statement on Behalf of Assembly Woman Bonnie Lowenthal, From 2/17/2010 Public Hearing

BL: Your comments are acknowledged and will be transmitted to the Board of Harbor Commissioners.

Port of Los Angeles, From 2/17/2010 Public Hearing

POLA: Your comments are acknowledged and will be transmitted to the Board of Harbor Commissioners.

International Longshore and Warehouse Union Local 63, From 2/17/2010 Public Hearing

ILWUL63: Your comments are acknowledged and will be transmitted to the Board of Harbor Commissioners.

Los Angeles and Orange County Building and Construction Trades Counsel, From 2/17/2010 Public Hearing

LA/OCBCTC: Your comments are acknowledged and will be transmitted to the Board of Harbor Commissioners.

Michael Larison, From 2/17/2010 Public Hearing

ML: Your comments are acknowledged and will be transmitted to the Board of Harbor Commissioners. With regard to the portion of the comment indicating that the project will accommodate future generation vessels at Piers A, S, and T, it should be noted that the existing Back Channel navigational constraints (depth and width) will remain the same, precluding vessels larger than 8,000-8,999 TEUs until such time as those constraints are removed.

Foreign Trade Association of Southern California, From 2/17/2010 Public Hearing

FTASC: Your comments are acknowledged and will be transmitted to the Board of Harbor Commissioners.

American Counsel of Engineering Companies, Los Angeles Chapter, From 2/17/2010 Public Hearing

LACACEC: Your comments are acknowledged and will be transmitted to the Board of Harbor Commissioners.

Mark Jurisic, From 2/17/2010 Public Hearing

MJ: Your comments are acknowledged and will be transmitted to the Board of Harbor Commissioners.

Painters and Allied Trades District Counsel 36, From 2/17/2010 Public Hearing

PATDC36(A): Your comments are acknowledged and will be transmitted to the Board of Harbor Commissioners.

International Brotherhood of Electrical Workers, Los Angeles, From 2/17/2010 Public Hearing

IBEWLA: Your comments are acknowledged and will be transmitted to the Board of Harbor Commissioners.

Pacific Merchant Shipping Association, From 2/17/2010 Public Hearing

PMSA: Your comments are acknowledged and will be transmitted to the Board of Harbor Commissioners.

Jane Templin, From 2/17/2010 Public Hearing

JTe: Your comments are acknowledged and will be transmitted to the Board of Harbor Commissioners. Although the Port does support Project Labor Agreements (PLA), as is evidenced by the recently approved PLA for the Port's Middle Harbor Project, applicability and feasibility for PLAs are determined on a project-by-project basis. At this time, it is too early in the project to make any determination if a PLA is a good fit for the Gerald Desmond Bridge Replacement Project. The decision regarding the applicability and use of a PLA for the Gerald Desmond Bridge Replacement Project will be made by the Board of Harbor Commissioners prior to putting the contract out for bid.

Butterfield Communications, From 2/17/2010 Public Hearing

BCOM: Subsequent to the public hearing, the Port reviewed the Web version of the document, and the section referenced in the comment was found to be included in the Web version. As described in the EIR/EA (see Table 2.1.3-6; page 2-38), at this time it is not anticipated that construction of the preferred alternative would require any permanent acquisition or easements at 1825 Pier D Street; however, the EIR/EA and discussion of potential effects on adjacent properties is based on preliminary engineering design plans, aerial photographs, and field reviews. Locations and numbers of affected properties could change during final design. At this time, the information as presented in the EIR/EA is the best available information regarding potential property acquisition, and size and location of affected parcels. Any changes in final ROW requirements will be coordinated with businesses in the Port as part of the final design phase of the project.

The Propeller Club of Los Angeles and Long Beach, From 2/17/2010 Public Hearing

PCLALB: Your comments are acknowledged and will be transmitted to the Board of Harbor Commissioners.

Responses Public Hearing Comments – February 24, 2010

Statement on Behalf of Congresswoman Laura Richardson, From 2/24/2010 Public Hearing

LR(B): Your comments are acknowledged and will be transmitted to the Board of Harbor Commissioners.

Statement on Behalf of Assemblyman Warren Furutani, From 2/24/2010 Public Hearing

WF(B): Your comments are acknowledged and will be transmitted to the Board of Harbor Commissioners.

Bartlett Patton, From 2/24/2010 Public Hearing

BP: Your comments are acknowledged and will be transmitted to the Board of Harbor Commissioners.

Anthony Wayne Ford, From 2/24/2010 Public Hearing

AF: As is noted in EIR/EA Section 3.2.11.1 at page 3-12, the temporary construction work force is expected to come from the local southern California labor pool.

John Schafer, From 2/24/2010 Public Hearing

JSc: Your comments are acknowledged and will be transmitted to the Board of Harbor Commissioners.

Painters and Allied Trades District Counsel 36, From 2/24/2010 Public Hearing

PATDC36(B): Please see the response to AF and JTe, above.

Jesse Marquez, From 2/24/2010 Public Hearing

JMa-1: As is also noted in the response to comment CSE-7a, the bridge is a Port-owned and maintained facility, and Caltrans is not empowered to restrict access to the bridge. Additionally, Caltrans does not have authority to restrict access to vehicles operating lawfully under the California Department of Motor Vehicles code on portions of the SHS, unless it is completed in accordance with Division 15 of the code or, in limited instances, where safety of the traveling public so requires. In addition, the Gerald Desmond Bridge is a designated truck route in the City of Long Beach General Plan Circulation Element, and it is also federally designated as a National Highway System Intermodal Connector Route. The bridge serves a much-needed purpose of providing for conveyance of vehicles, including trucks with origins and destinations within the San Pedro Bay Ports, between the cities of Long Beach and Los Angeles. Restricting truck access to this facility would not benefit the surrounding areas and communities, largely because vehicles (including trucks) needing to gain access to the freeway system (e.g., I-110 and SR 710) would then be required to use local streets, with attendant impacts on local neighborhoods. An orderly means of carrying autos and truck traffic in the Port vicinity to the freeway system and providing sufficient capacity for such traffic, both now and in the future, is necessary to the efficient functioning of the roadway system serving the southernmost portion of Los Angeles County.

Regarding the Bridge Rehabilitation Alternative, as is described in EIR/EA Section 1.6.2, while the seismic stability of the bridge can be improved and its life span increased under this alternative, two deficiencies would accrue to this alternative that would be overcome by either of the Bridge Replacement Alternatives. The rehabilitated bridge would not provide additional carrying capacity, which either of the Bridge Replacement Alternatives would accomplish, and the height of the bridge would remain at its present 156 ft above the MHWL, which would preclude passage of larger container vessels expected to call at the Port in the future. The Rehabilitation Alternative is therefore not designated as preferred.

JMa-2: Please see the response to comments CSE-14, CSE-15, CSE-28, and NRDC-7.

JMa-3: Please see the response to comment CSE-30.

JMa-4: Please see the response to comments JM-1, CSE-14, CSE-15, CSE-28, and NRDC-7

Mark Mendonga, From 2/24/2010 Public Hearing

MMe: Your comments are acknowledged and will be transmitted to the Board of Harbor Commissioners.

International Operating Engineers, From 2/24/2010 Public Hearing

IOE12: Your comments are acknowledged and will be transmitted to the Board of Harbor Commissioners. Please see response to JTe.

Future Ports, From 2/24/2010 Public Hearing

FP(B): Your comments are acknowledged and will be transmitted to the Board of Harbor Commissioners.

Simi McMoore, From 2/24/2010 Public Hearing

SM: Your comments are acknowledged and will be transmitted to the Board of Harbor Commissioners.

IEBW11, From 2/24/2010 Public Hearing

IEBW11: Please see response to JTe.

Tyrone Taaga, From 2/24/2010 Public Hearing

TT: Your comments are acknowledged and will be transmitted to the Board of Harbor Commissioners.

Davis Teofilo, From 2/24/2010 Public Hearing

DT: Please see response to JTe.

Future Ports, From 2/24/2010 Public Hearing

FP(C): Your comments are acknowledged and will be transmitted to the Board of Harbor Commissioners.

Ken Fredrickson, From 2/24/2010 Public Hearing

KF(B): Your comments are acknowledged and will be transmitted to the Board of Harbor Commissioners.

John Sommers, From 2/24/2010 Public Hearing

JSo-1: As discussed in comment BW above, the Port's consultant team was selected through a competitive process to identify and place under contract a world-class team of consultants. The Parsons/HNTB Joint Venture, which included the Danish architectural firm of Dissing & Weitling, was selected by the Port. Being located in the City of Long Beach was not a selection criterion.

Regarding the Port's involvement with local school programs, the Port is involved with and sponsors numerous programs intended to reach out to the educational community. The goal of these efforts is fostering long-term relationships that can yield local talent serving the Port. Among these are the following examples:

- Since 1982 – Business partner with Long Beach Poly's Center for International Commerce;

- Since 1990 – Business partner with Long Beach Poly's Pacific Rim Academy;
- Partner – LBUSD, LBCC, and CSULB for day-long staff development programs focused on international trade careers;
- Staff lecturers at CSULB and LBCC international business classes;
- Since 1993 – Port awards of more than \$260,000 in scholarship support to 200 students enrolled in college programs focused on international trade and the maritime industry;
- Founder – CSULB Global Logistics Specialist Program (more than 500 people have completed the program); the program now offers a Master's Degree; and
- Various other outreach efforts to elementary and secondary schools in the Long Beach area.

JSo-2: The cumulative impact analysis (see EIR/EA Section 2.4; beginning on page 2-361) takes into account all known past, present, and reasonably foreseeable projects.

JSo-3: The referenced cost estimate includes all components of capital cost, including ROW acquisition.

John Taleifi, From 2/24/2010 Public Hearing

JTa: Subsequent to the public hearing on March 12, 2010, Rick Cameron, POLB Director of Environmental Planning, met with Mr. Taleifi and other representatives of the West Long Beach Association. Further meetings will be scheduled, as needed.

Thor Carlson, From 2/24/2010 Public Hearing

TC: Please see response to BW and JSo-1.

Salera, From 2/24/2010 Public Hearing

S-1: The I-710 Improvement project is in the project development stage. The Gerald Desmond Bridge Project Team has been coordinating with the I-710 Team regarding the proposed improvements within the Gerald Desmond Bridge Replacement Project area. The I-710 project is proceeding on its own schedule; coordination between the two projects with regard to construction scheduling will be necessary. Project information and contact information for the project can be found at http://www.metro.net/projects/i710_corridor/. You can also leave a voice message on the project line by calling (213) 922-4710.

S-2 One of the alternatives being considered in the I-710 project is to provide separate lanes for truck use; however, alternatives for the project are still being considered, and the environmental document is being prepared. The Port understands your concerns regarding potential health impacts related to the project. An HRA was prepared for the Gerald Desmond Bridge Replacement Project and showed decreasing risk associated with TACs. An HRA will also be completed as a component of the I-710 project. Additional information regarding the HRA and all other issues, including the current schedule and status, can be found on the METRO Web site (see S-1). Based on the status of the I-710 project when compared to the Gerald Desmond Bridge Replacement Project, it is likely that the new bridge will be well into construction before construction begins on the I-710 project. With regard to rerouting the bridge, the project is a bridge replacement project. There is no supporting infrastructure for rerouting truck traffic from the bridge or I-710, and it would result in greater impacts than the proposed project. The bridge is the entry point for 10 percent of all waterborne goods on the west coast, the beginning of the I-710 goods movement corridor, and a vital component for POLB and POLA operations and for regional traffic.

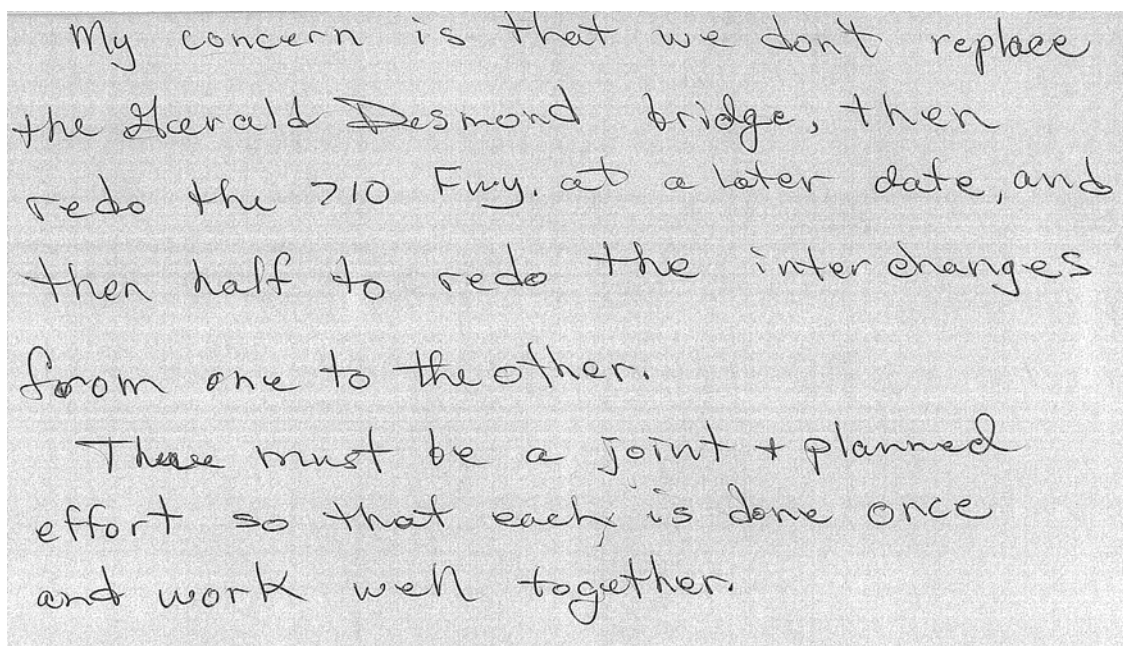
Gary Anderson, From 2/24/2010 Public Hearing

GA: This project will be procured under the provisions of the Federal "Buy American" policy for federally funded projects.

Edith Pearl, From 2/24/2010 Public Hearing (written comment)

EP: The I-710 Corridor Project is in the project development stage. The Gerald Desmond Bridge Project Team has been coordinating with the I-710 Project Development Team (PDT) regarding the proposed improvements within the Gerald Desmond Bridge Replacement Project area. The preliminary plans for the Gerald Desmond project have been provided to the I-710 PDT for consideration and planning during the development of the I-710 Corridor Project. Based on the most recent coordination meeting held on April 14, 2009, the only portion of the Gerald Desmond Bridge project that could be impacted by the future I-710 Corridor Project would be where a portion of the I-710 Project connects at the northern limits of the Gerald Desmond Project. The Port will continue to coordinate with the I-710 PDT as planning for that project progresses. See also response to S-1 above.

EP



My concern is that we don't replace the Gerald Desmond bridge, then redo the 710 Fwy. at a later date, and then half to redo the interchanges from one to the other.

There must be a joint + planned effort so that each is done once and work well together.