Memorandum

To: CHAIR AND COMMISSIONERS **CTC Meeting**: December 5-6, 2024

From: TANISHA TAYLOR, Executive Director

Reference Number: 2.2c.(5), Action

Prepared By: Cherry Zamora
Associate Deputy Director

Published Date: November 22, 2024

Subject: Approval of Project for Future Consideration of Funding – Vincent Thomas Bridge Deck Replacement Project, Resolution E-24-116

Recommendation:

Staff recommends the California Transportation Commission (Commission), as a Responsible Agency under the California Environmental Quality Act (CEQA), approve the attached Resolution E-24-116 (Attachment A), which accepts the Final Environmental Impact Report for the Vincent Thomas Bridge Deck Replacement Project (Project) in Los Angeles; approves the Project for future consideration of funding; makes CEQA Findings (Attachment C); and adopts a Statement of Overriding Considerations (Attachment D).

Issue:

The California Department of Transportation (Caltrans) is the CEQA Lead Agency for the Project. The project is located on the Vincent Thomas Bridge (Bridge 53-1471) on State Route 47 in the Port of Los Angeles. The project would replace the deteriorated bridge deck, upgrade seismic sensors, and improve the existing median barrier and railings.

For all projects that are seeking funding through a program under the purview of the Commission, full compliance with CEQA is required. The Commission will not allocate funds to projects for design, right-of-way, or construction until the environmental document is complete, and the Commission has approved the environmentally cleared project for future consideration of funding.

Background:

On October 24, 2024, Caltrans certified the Final Environmental Impact Report for the Project. Caltrans found that the Project would have significant and unavoidable impacts on cumulative temporary air quality, traffic and transportation, and environmental justice. These impacts would remain significant and unavoidable even with implementation of the project's mitigation measures, which include: compliance with laws and regulations related to air quality (including South Coast Air Quality Management District rules on visible emissions, public nuisance,

fugitive dust, asbestos, and limitation of idling), application of best management practices, requiring off-road construction equipment be outfitted with engines meeting Tier 4 emissions standards, using properly tuned and maintained construction equipment, temporary restriping and signal synchronization of identified intersections, repairing detour routes, implementing a Transportation Management Plan, coordinating projects with overlapping construction, and regular and ongoing community engagement.

Impacts that require mitigation measures in order to be reduced to less than significant levels relate to biological resources, traffic, and transportation. Mitigation measures include temporary restriping and signal synchronization of identified intersections, repairing detour routes, implementing a Transportation Management Plan, use of nesting exclusionary devices on the bridge prior to construction, bird surveys, biological monitoring, construction staff training, limiting nightwork, and compensatory mitigation through construction of an artificial nest platform.

The Commission, in its independent judgment as a CEQA responsible agency, has reviewed and considered the Final Environmental Impact Report prepared by Caltrans. The Commission's Findings and Statement of Overriding Considerations, included in Attachment C and Attachment D respectively, have been prepared pursuant to CEQA.

Attachments:

- Attachment A: Resolution
- Attachment B: Notice of Determination
- Attachment C: California Transportation Commission - Findings
- Attachment D: California Transportation Commission - Statement of Overriding Considerations
- Attachment E: Lead Agency Request for Approval of Project for Future Consideration of Funding Resolution E-24-116
    - Attachment 1: Map
    - Attachment 2: California Department of Transportation -- Findings
    - Attachment 3: California Department of Transportation -- Statement of Overriding Considerations

CALIFORNIA TRANSPORTATION COMMISSION

Resolution for Future Consideration of Funding
07-LA-47, PM 0.4/2.0
Resolution E-24-116

1.1 WHEREAS, the California Department of Transportation (Caltrans) has completed a Final Environmental Impact Report pursuant to the California Environmental Quality Act (CEQA) and the CEQA Guidelines for the following project:

- Vincent Thomas Bridge Deck Replacement on State Route (SR) 47 in Los Angeles County. Replace the entire bridge deck and seismic sensors of the bridge to preserve the functionality and structural integrity of the bridge deck and to enhance the bridge's overall safety. (PPNO 6024)

1.2 WHEREAS, Caltrans has certified that a Final Environmental Impact Report has been completed pursuant to CEQA and the State CEQA Guidelines for its implementation; and

1.3 WHEREAS, the California Transportation Commission (Commission), as a responsible agency, has considered the information contained in the Final Environmental Impact Report; and

1.4 WHEREAS, the project will have a significant effect on the environment; and

1.5 WHEREAS, the Commission has made findings as required by California Code of Regulations, title 14, section 15096, subdivision (h); and

1.6 WHEREAS, the Commission has adopted a Statement of Overriding Considerations pursuant to California Code of Regulations, title 14, section 15093;

2.1 NOW, THEREFORE, BE IT RESOLVED that the California Transportation Commission does hereby approve the above referenced project to allow for future consideration of funding.

Reference No.: 2.2c.(5)
December 5-6, 2024
Attachment B

NOTICE OF DETERMINATION

To: Office of Land Use and Climate Innovation
1400 Tenth Street, Room 121
Sacramento, CA 95814

From: California Transportation Commission
Attn: Cherry Zamora
1120 N Street, MS 52
Sacramento, CA 95814
(916) 654-4245

Subject: Filing of Notice of Determination in compliance with Section 21108 of the Public Resources Code.

Project Title: Vincent Thomas Bridge Deck Replacement Project

2023040301	Jason Roach	(213) 310-2653
State Clearinghouse Number	**Lead Agency Contact Person**	**Area Code/Telephone**

Project Location (include county): State Route (SR) 47 from postmile (PM) 0.4 to PM 2.0, in Los Angeles County.

Project Description: Replace the entire bridge deck and seismic sensors of the bridge to preserve the functionality and structural integrity of the bridge deck and to enhance the bridge's overall safety.

This is to advise that the California Transportation Commission has approved the above described project on (_ Lead Agency/ **X** Responsible Agency)

December 5-6, 2024, and has made the following determinations regarding the above described project:

1. The project (_X_will/ _ will not) have a significant effect on the environment.
2. _X_An Environmental Impact Report was prepared for this project pursuant to the provisions of CEQA.
   __A Negative Declaration was prepared for this project pursuant to the provisions of CEQA.
3. Mitigation measures (_X were/ _ were not) made a condition of the approval of the project.
4. Mitigation reporting or monitoring plan (_X was / _ was not) adopted for this project.
5. A Statement of Overriding Considerations (_X was / _ was not) adopted for this project.
6. Findings (_X were/ _ were not) made pursuant to the provisions of CEQA.

The above identified document with comments and responses and record of project approval is available to the General Public at: https://www.virtualeventroom.com/caltrans/vtb/ and Caltrans District 7, 100 South Main Street, MS-16A, Los Angeles, CA 90012.

TANISHA TAYLOR		Executive Director California Transportation Commission
Signature (Public Agency)	*Date*	*Title*

Date received for filing at Office of Land Use and Climate Innovation:

Project Name: Vincent Thomas Bridge Deck Replacement
DIST-CO-RTE-PM: 07-LA-SR 47-0.4/2.0
EA: 39020
EFIS ID: 0722000334
SCH#: 2023040301

CALIFORNIA TRANSPORTATION COMMISSION
FINDINGS OF FACT

FOR

THE STATE ROUTE 47 VINCENT THOMAS BRIDGE DECK REPLACEMENT PROJECT

The following information is presented to comply with California Environmental Quality Act (CEQA) Guidelines, California Code of Regulations, title 14, sections 15091 and 15096, and also title 21, section 1501 et seq. Reference is made to the Final Environmental Impact Report (EIR) for the project, which is the basic source for the information.

The following effects have been identified in the Final EIR as resulting from the project. Effects found not to be significant have not been included.

Cumulative

Adverse Environmental Effects:

The proposed Build Alternative with the single-stage construction (full bridge closure) option would result in temporary significant cumulatively considerable air quality and traffic impacts to environmental justice communities. In addition, the other reasonably foreseeable projects in the region may result in temporary impacts to environmental justice communities.

Implementation of the proposed Build Alternative (single-stage construction) would result in temporary emissions increases affecting air quality for residents particularly due to increased use of detour routes. In addition, the other reasonably foreseeable projects in the project area may result in temporary air quality impacts.

The impacts to traffic conditions within the project area, including increased traffic congestion and delay resulting from the closure of the Vincent Thomas Bridge, would be temporary and would vary in duration and severity depending on the construction staging option implemented. The single-stage construction staging option (full bridge closure) would result in the greatest increase in intersection delay, origin-destination

travel time, and corridor vehicle miles traveled (VMT)/vehicle-hour delay, and the greatest decrease in segment speed; therefore, temporary significant cumulatively considerable traffic impacts within the project area are anticipated with implementation of the Build Alternative (full bridge closure construction option).

Findings:

Changes or alterations have been required in, or incorporated into, the project, which avoid or substantially lessen the significant environmental effect as identified in the final EIR.

Statement of Facts:

The project includes measures to address direct temporary impacts to traffic flow in the project area, including coordination with other agencies on targeted pavement rehabilitation of detour routes, intersection improvements, and the implementation of a Transportation Management Plan. In addition, regular coordination with other agencies and projects regarding construction timing and potential traffic detours, along with regular community engagement, would provide a managed effort to inform the public and to maintain traffic flow and transit service through the project area, thereby minimizing potential temporary cumulative transportation impacts. Temporary construction-related air quality impacts would be minimized through the application of construction equipment emissions reduction measures; however, temporary cumulatively considerable impacts to air quality and traffic for the Build Alternative with the full bridge closure option are anticipated.

Transportation

Adverse Environmental Effects:

Transportation projects that reduce, or have no impact on, VMT should be presumed to cause a less than significant transportation impact. This project's Build Alternative has four different construction staging options. The two-stage, three-stage, and full nighttime closure construction options would maintain existing conditions upon completion and would have no permanent impact on VMT. Temporary closures of the bridge would slightly increase VMT for some origin and destination routes that otherwise would have used the Vincent Thomas Bridge.

The single-stage (full-closure) construction option would maintain existing conditions upon completion and would have no permanent impact on VMT. The temporary closure of the entire bridge would not measurably increase VMT in the project area; however, the increase of 0.12 percent in VMT for the Community Impact Assessment Study Area is larger than the other three construction staging options being considered.

Findings:

Changes or alterations have been required in, or incorporated into, the project, which avoid or substantially lessen the significant environmental effect as identified in the final EIR.

Statement of Facts:

The two-stage, three-stage, and full nighttime closure construction options would maintain existing conditions upon completion and would have no permanent impact on VMT. Temporary closures of the bridge would slightly increase VMT for some origin and destination routes that otherwise would have used the Vincent Thomas Bridge; however, these impacts are minimal and would be further minimized by project measures (coordination with other agencies on targeted pavement rehab of detour routes, intersection improvements, and a Traffic Management Plan); therefore, these construction staging options would result in a less than significant impact.

The single-stage (full-closure) construction option would maintain existing conditions upon completion and would have no permanent impact on VMT. The temporary closure of the entire bridge would not measurably increase VMT in the project area; however, the increase of 0.12 percent in VMT for the Community Impact Assessment Study Area is larger than the other three construction staging options being considered. The Build Alternative would result in a temporary less than significant impact with mitigation incorporated to the VMT guidance in State CEQA Guidelines Section 15064.3, subdivision (b) for the single-stage (full-closure) option.

Implementation of strategies including regular coordination with other agencies and projects regarding construction timing and potential traffic detours, along with regular community engagement, would provide a managed effort to inform the public and to maintain traffic flow and transit service through the project area, thereby minimizing potential temporary transportation impacts.

Biology

Adverse Environmental Effects:

The proposed project would interfere with bird nesting by occupying the same space in which nesting would occur. Since the project must place platforms under the bridge deck to capture demolition debris and prevent that debris from entering the channel, there would be a substantial amount of human activity around the area that birds, especially the peregrine falcon, nest. This heightened activity would cause disturbance to the birds. The construction of the debris catchment system would also impede access to space under the bridge deck, making ingress and egress to that space difficult for nesting birds. Demolishing the bridge deck would also cause debris to fall onto and around the existing nest and/or newly constructed nests, which could cause nest failure, and which would also interfere with nesting. Lastly, the noise from concrete demolition

and other activities would harass the nesting birds, since it would occur within 150 to 500 feet of the nest or closer. With implementation of the measures below, the impacts to bird (peregrine falcon) habitat would be less than significant with mitigation incorporated.

Findings:

Changes or alterations have been required in, or incorporated into, the project, which avoid or substantially lessen the significant environmental effect as identified in the final EIR.

Statement of Facts:

With implementation of the measures below, the impacts to bird (peregrine falcon) habitat would be less than significant.

- To prevent the project from interrupting nesting and causing nest failure, which would result in a substantial waste of energy and decreased ease of reproduction for the peregrine falcon, Caltrans would install nesting exclusionary devices on the bridge prior to the nesting season in which construction is planned to occur. These devices shall be installed prior to the initiation of demolition activities within 500 feet of existing nesting locations. If existing nesting sites are occupied, then exclusion activities shall not occur until after the last young leave the nests. The exclusionary devices would prevent the falcon and other birds from attempting to nest on the bridge. Specifications of the exclusionary devices will be determined during the design phase of the project in coordination with the California Department of Fish and Wildlife and the United States Fish and Wildlife Service to ensure efficacy and safety.

- A biologist with experience in surveying and monitoring avian activity will survey the bridge and its surroundings prior to construction if it occurs during the bird nesting season (February 1st to September 1st). A lapse in construction is not planned, but if there is a lapse in construction for longer than 3 days, a repeat survey would be performed. If birds are observed attempting to nest on the bridge, then a no-work buffer around the nest would be implemented and Caltrans would conduct consultation with the United States Fish and Wildlife Service and the California Department of Fish and Wildlife.

- A biologist will monitor the bridge during construction for signs of whether birds are nesting on the bridge. They will keep track of nesting birds on the bridge and evaluate whether construction has the potential to, or is, disturbing nesting birds. The biological monitor will also observe construction to ensure that construction best management practices are applied to prevent incidental effects to the channel, water quality, and jurisdictional waters.

- If nests are found on the Vincent Thomas Bridge, a qualified biologist shall monitor the nests weekly during the project and shall send monitoring reports to the California Department of Fish and Wildlife.

- A qualified biologist will make a presentation to construction staff who are on site for longer than 30 minutes. The staff will be advised on the bird species that have been known to occur in the project area, their nest appearance and siting factors, the project's conservation measures, and the procedures for reporting and avoiding nesting migratory birds.

- If night work is necessary, it shall be limited, and light shall be downcast and shielded to avoid unnecessary illumination of non-active work areas.

- Compensatory Avoidance Measure. Prior to the nesting season in which construction is planned to occur, Caltrans will construct an artificial nest platform outside of the project impact area within the Port of Long Beach/Port of Los Angeles complex to compensate for the temporary loss of the nesting space on the Vincent Thomas Bridge. The artificial nest platform will likely be placed close to the bridge so that falcons that repeatedly nest on the Vincent Thomas Bridge are aware of the artificial nesting platform. The platform would be constructed in a way, and at a site, that would make it suitable for peregrine falcon nesting, taking into consideration the elevation, the visibility of the platform, and other site characteristics. Potential nest platform sites will be discussed in consultation with the California Department of Fish and Wildlife. The artificial nest platform shall remain in place after project completion.

DOCUMENT AVAILABILITY

Documents or other material which constitute the record of the proceedings upon which the California Transportation Commission's decision is based are available at https://www.virtualeventroom.com/caltrans/vtb/ and Caltrans District 7, 100 South Main Street, MS-16A, Los Angeles, CA 90012.

Tanisha Taylor		
Executive Director	Signature	Date

Project Name: Vincent Thomas Bridge Deck Replacement Project
DIST-CO-RTE-PM: 07-LA-SR 47-0.4/2.0
EA: 39020
EFIS ID: 0722000334
SCH #: 2023040301

CALIFORNIA TRANSPORTATION COMMISSION
STATEMENT OF OVERRIDING CONSIDERATIONS

FOR

THE VINCENT THOMAS BRIDGE (VTB) DECK REPLACEMENT PROJECT

The following information is presented to comply with California Environmental Quality Act (CEQA) Guidelines, California Code of Regulations, title 14, sections 15091 and 15096, and also title 21, section 1501 et seq. Reference is made to the Final Environmental Impact Report (EIR) for the project, which is the basic source for the information.

The California Transportation Commission, in its independent judgment as a CEQA responsible agency, reviewed and considered the Final EIR prepared by the California Department of Transportation and finds that the Final EIR contains a complete, objective, and substantiated reporting of the project's potential impacts.

The following impacts have been identified as significant and not fully mitigable:

Cumulative Impacts

The Build Alternative proposes to replace the deck of the Vincent Thomas Bridge; replace the median concrete barriers, fencing, and guardrails; and upgrade the bridge's seismic sensors. The cumulative impact analysis determines whether the Build Alternative, in combination with other past, present, or reasonably foreseeable projects, would result in a cumulative effect and, if so, whether the Build Alternative's contribution to the cumulative impact would be considerable.

A Resource Study Area corresponds to a geographic area cumulative impact that a particular resource can be analyzed within. Only active projects, defined as currently under construction or planned, were considered within each Resource Study Area. These projects were identified using information obtained from Caltrans and agency websites within the Resource Study Area. The identified projects are located in the Port of Los

Angeles, Port of Long Beach, and the cities of Los Angeles, Long Beach, and Carson. The projects included are those that could contribute to cumulative impacts within the study area for each respective resource analyzed in the Final EIR (see Table 2.23-1 of the Final EIR).

The following resources were evaluated for cumulative impacts:

Air Quality

Resource Study Area:

The Resource Study Area for air quality cumulative impacts is a roughly 52-square-mile area that includes the communities of Wilmington, Harbor City, San Pedro, and Terminal Island within the city of Los Angeles, a portion of the cities of Carson and Long Beach, and both the Port of Los Angeles and the Port of Long Beach. The Resource Study Area encompasses the area where secondary or indirect impacts from construction or operations of the Build Alternative are anticipated to occur, including the proposed detour routes that would be necessary to divert traffic from the bridge during project construction.

While air quality within the region has been improving, due to local and State rules, which have resulted in cleaner emission cars and industries, the residents of Wilmington, Carson, and West Long Beach are located adjacent to several sources of pollution, including the Port of Los Angeles and the Port of Long Beach, five oil refineries, nine rail yards, four major freeways, several chemical facilities, and the third largest oilfield in the contiguous United States (Yee and Getahun 2022). The Port of Los Angeles and the Port of Long Beach are the two busiest ports in the nation and have seen increases in congestion due to increased cargo imports and supply chain disruptions. This has resulted in more anchored ships running on auxiliary engines waiting to dock along with the increased truck and train activity to move the cargo. Therefore, the overall health of the resource within the Resource Study Area could be classified as in poor health, declining health, or at risk.

Project Impact:

As discussed in Section 2.13 of the EIR (Air Quality), implementation of the Build Alternative would result in no appreciable long-term difference in air quality conditions between the Build and No Build Alternatives because the project is not expected to permanently change the vehicle capacity or traffic patterns on the Vincent Thomas Bridge or surrounding roads. The proposed project would have no effect on long-term mobile source emissions in the region. There is no potential for an increase in permanent emissions that could contribute to cumulative emissions or interfere with air quality plans that are designed to reduce cumulative air quality impacts.

There is the potential that local and regional air quality would be temporarily affected for 16 months during construction of the Build Alternative. Emissions from construction equipment powered by gasoline and diesel engines would include carbon monoxide,

nitrogen oxides, volatile organic compounds, minimal amounts of sulfur oxides, directly emitted PM2.5, particulate matter less than 10 microns in size (PM10), and toxic air contaminants such as diesel exhaust particulate matter. These emissions would be temporary and limited to the immediate area surrounding the construction site. Short-term degradation of air quality may also occur from the release of particulate emissions (airborne dust) generated by demolition, hauling, and other activities related to construction; however, the potential for these emissions to affect sensitive receptors would be very low due to construction occurring predominantly within the existing bridge structure footprint. As shown in Table 2.13-9 of the EIR, the temporary increases in emissions and incremental changes in PM10 concentrations within the Resource Study Area communities would remain below applicable regulatory thresholds for all construction scenarios. Additionally, the effects of the temporary construction-related emissions would be minimized with implementation of the following measures (identified as AM-AQ-1, AM-AQ-2, and PF-AQ-1 in the EIR):

AM-AQ-1 The construction contractor must comply with the Caltrans' Standard Specifications in Section 14-9 (2023):

- Section 14-9-02 specifically requires compliance by the contractor with all applicable laws and regulations related to air quality, including air pollution control district and air quality management district regulations and local ordinances.
- Section 14-9.05 requires identification of the local air quality jurisdiction (South Coast Air Quality Management District) and for the contract to comply with all applicable rules and best management practices.

AM-AQ-2 The construction contractor must also comply with Caltrans project-specific Non-Standard Special Provisions 5-1.33 and 7-1.02C, which require that off-road construction equipment be outfitted with engines meeting Tier 4 emissions standards and that all certification and maintenance documentation be provided prior to equipment use. Implementation of these Non-Standard Special Provisions would reduce emissions of ozone precursors and criteria pollutants (primarily particulate matter and nitrogen oxides) during construction activities.

PF-AQ-1 Construction equipment and vehicles will be properly tuned and maintained. All construction equipment will use low sulfur fuel as required by 17 California Code of Regulations Section 93114.

- The construction contractor must comply with South Coast Air Quality Management District rules, including Rule 401 (Visible Emissions), Rule 402 (Nuisance), Rule 403 (Fugitive Dust), and Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities).
- Diesel-powered off-road equipment shall limit idling in accordance with the California Air Resources Board "Regulation for In-Use Off-Road Diesel-Fueled Fleets" (13 California Code of Regulations Section 2449).

- Diesel-powered on-road vehicles and trucks shall limit idling in accordance with the California Air Resources Board's "Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling" (13 California Code of Regulations Section 2485)."

The proposed project is located within one of the identified Assembly Bill (AB) 617 communities (Wilmington/Long Beach/Carson) for which the California Air Resources Board is required to establish a program to reduce air pollution exposure. To help address public health disparities in these communities, Caltrans requires construction equipment to have engines that comply with United States Environmental Protection Agency Tier 4 emission standards for off-road diesel-fueled vehicles. The proposed project will incorporate two Non-Standard Special Provisions to ensure that contractors use equipment outfitted with Tier 4 engines during construction (7-1.02C) and that all appropriate certification documentation is provided for use authorization (5-1.33).

Current and Reasonably Foreseeable Future Actions:

Current and reasonably foreseeable actions in the Resource Study Area include transportation and in-fill development projects listed in Table 2.23-1 of the EIR. There is the potential for temporary increases in construction-related emissions during the construction of each project. However, the construction-related impacts from these projects would be relatively short term and would be minimized to the greatest extent feasible with implementation of standard construction best management practices to minimize construction emissions.

Implementation of these projects would add additional employment locations, residential units, commercial and recreational facilities, and increased port operations. This anticipated growth would likely result in an increase in traffic and associated vehicle emissions within the Resource Study Area due to more vehicles traveling to/from and within it. In addition, proposed projects at the ports would result in increases in criteria pollutant emissions compared to current levels due to increased ship, rail, and truck operations at the ports.

Conclusion of Cumulative Impacts:

As noted above, implementation of the proposed Build Alternative would not result in an increase in permanent emissions but would result in temporary emission increases affecting air quality for residents. In addition, the other reasonably foreseeable projects may result in temporary air quality impacts. With the implementation of AM-AQ-1, AM-AQ-2, PF-AQ-1 (see above), Non-Standard Special Provisions, and best management practices, temporary air quality impacts associated with the proposed project would be minimized; however, temporary cumulatively considerable air quality impacts within the Resource Study Area are anticipated with implementation of the Build Alternative.

Traffic and Transportation

Resource Study Area:

The Resource Study Area for transportation-related cumulative impacts is a roughly 52-square-mile area that includes the communities of Wilmington, Harbor City, San Pedro, and Terminal Island within the city of Los Angeles, and a portion of the city of Carson, and the city of Long Beach, and both the Port of Los Angeles and the Port of Long Beach. The Resource Study Area encompasses the proposed detour routes that would be necessary to divert traffic from the bridge during project construction. The conceptual detour routes include Sepulveda Boulevard between Interstate 710 (I-710) and Interstate 110 (I-110), Pacific Coast Highway (PCH) between SR-47 and I-110, Harry Bridges Boulevard/Alameda Street/E. Anaheim Street between SR-47 and I-110, and portions of State Route (SR) 103, SR-47, I-110, and I-710 between the Vincent Thomas Bridge and Sepulveda Boulevard. Within the Resource Study Area, 50 of the 59 intersections are controlled with either traffic signals or stop controls (see Section 2.10 of the EIR). The sum of traffic volumes entering all the study intersections varies between approximately 158,000 vehicles in the AM peak hour to approximately 162,000 vehicles in the PM peak hour. Existing traffic conditions within the Resource Study Area show that the majority of intersections operate at a level of service D or better during weekday AM, mid-day, and PM peak hours, with only 10 of 50 intersections operating at a level of service E or F in the AM peak hour and 12 of 50 operating at level of service E or F in the PM peak hour. Based on the current operational conditions within the Resource Study Area, the overall traffic conditions are not classified as in poor health, declining health, or at risk.

Project Impacts:

Traffic analysis indicates that the Build Alternative would result in increased congestion at intersections throughout the Resource Study Area for all peak periods. Congestion is determined by adding the change in vehicle delay at intersections plus the change in level of service. The average delay increase is 37 percent compared to the baseline for the single-stage option (full bridge closure).

Similarly, the projected traffic increases along the proposed detour routes during the peak periods would vary by staging option, with the PM peak period showing the greatest increases. On Sepulveda Boulevard, the increase in traffic during the PM peak period would range from 97 to 270 vehicles, on PCH the increase in vehicles would range from 113 to 414, while Harry Bridges Boulevard would experience the greatest increase in detoured traffic with 315 to 762 additional vehicles. Average speeds along all roadway segments would be reduced during all peak periods with the single-stage option (full bridge closure) resulting in the greatest reduction. During the construction period, there would be a small increase in vehicle miles traveled (VMT), of up to a 0.12 percent increase for the single-stage construction option.

Following completion of the improvements associated with the Build Alternative, the Vincent Thomas Bridge would maintain its existing configuration, and traffic patterns would not be altered. Therefore, implementation of the project would not induce additional VMT within the Resource Study Area.

Current and Reasonably Foreseeable Future Actions:

Current and reasonably foreseeable actions in the Resource Study Area include transportation and the in-fill development projects listed in Table 2.23-1 of the EIR. For traffic analysis purposes, the SR-47/Vincent Thomas Bridge and Front Street/Harbor Boulevard Interchange Reconfiguration Project (#7), along with lane reductions along Alameda Street between Harry Bridges Boulevard and PCH (#12), were assumed complete and were included as part of the baseline condition. The identified development projects within the ports and surrounding communities would add additional employment locations, residential units, and commercial and recreational facilities. This anticipated growth would likely result in an increase in vehicular traffic within the Resource Study Area due to more vehicles traveling to/from and within it. In addition, construction of several of the identified roadway projects, including the Alameda Street South Improvement Project, Alameda Street North Improvement Project, Westbound Anaheim Street Widening, ADA improvements along PCH, and SR-103 Pavement Preservation Project may overlap with the anticipated construction timeline for the Vincent Thomas Bridge Deck Replacement Project. This project construction overlap may result in additional street or lane closures and/or detours occurring at the same time as the closure of the Vincent Thomas Bridge, thereby contributing to additional congestion and delay throughout the Resource Study Area and resulting in temporary cumulative traffic impacts.

Conclusion of Cumulative Impacts:

The impacts to traffic conditions within the Resource Study Area, including increased traffic congestion and delay resulting from the closure of the Vincent Thomas Bridge, would be temporary and would vary in duration and severity depending on the construction staging option implemented. The single-stage construction staging option (Preferred) would result in the greatest increase in intersection delay, origin-destination travel time, and corridor VMT/vehicle-hour delay, and the greatest decrease in segment speed.

As stated above, other current and foreseeable projects within the Resource Study Area would contribute to additional traffic congestion and delay; however, these projects would be required to include measures to mitigate for impacts to traffic and transportation. The proposed project would include mitigation measures MM-TR-1 and MM-TR-2 along with PF-TR-1 to address direct temporary impacts to traffic flow in the Resource Study Area (see below). In addition, implementation of the strategies identified in MM-EJ-1 and MM-EJ-2 (including regular coordination with other agencies and projects regarding construction timing and potential traffic detours), along with regular community engagement, would provide a managed effort to inform the public and to maintain traffic flow and transit service through the Resource Study Area, thereby minimizing potential

temporary cumulative transportation impacts. The Community Advisory Committee and Technical Advisory Committee will continue to meet throughout the duration of project construction providing additional opportunities for communication and coordination with various agencies to manage projects with overlapping construction to avoid and minimize schedule conflicts.

Temporary construction-related impacts would be minimized through the application of identified measures; however, temporary cumulatively considerable impacts to traffic and transportation for the Build Alternative with the full bridge closure option are anticipated.

MM-TR-1 Temporary Restriping and Signal Synchronization of Identified Intersections. The Traffic Operations Analysis Report (2024) outlines potential improvements that can be developed at 12 intersections within the Community Impact Assessment (2024) Study Area. The potential temporary improvements involve restriping, minimal geometric reconfigurations, and signal phasing modifications. A detailed analysis of restriping at the identified 12 intersections can be found in the Traffic Operations Analysis Report (2024) and is available upon request.

The temporary modification of intersections outside of Caltrans right-of-way would be dependent on approval by all respective local jurisdictional agencies. Caltrans will coordinate with local jurisdictional agencies regarding this measure.

MM-TR-2 Repairing Detour Routes. Caltrans will partner with the City of Los Angeles to seek opportunities to repair detour routes prior to and after the construction of the project. The repair of detour routes outside of Caltrans right-of-way would be dependent on approval by all respective local jurisdictional agencies. Caltrans will coordinate with local jurisdictional agencies regarding this measure.

PF-TR-1 Transportation Management Plan

The Transportation Management Plan will designate the detour route(s) to be utilized during construction. The Transportation Management Plan and detour routes will potentially change during project construction to respond to real-time conditions and feedback from the community and stakeholders. The Transportation Management Plan will be developed in coordination with local agencies and project stakeholders in the Design and Construction phases of the project through the project Technical Advisory and Community Advisory Committees (MMEJ-1, MM-EJ-2).

a. Changeable Message Signs. Permanent overhead message signs are located along roadways approaching the project area to notify road users of lane and road closures on the bridge, work activities, traffic incidents, potential work zone hazards, traffic queues

(backups), travel times, or delay information, as well as alternate routes in or around the work zone.

b. Portable Changeable Message Signs. Portable overhead message signs will be placed at key locations to notify motorists of lane closures, alternate routes, expected delay, and upcoming road closures on the bridge. These signs will be used to inform drivers of speed limit reductions and enforcement activities in a work zone, as well as projected delay or road opening times.

Environmental Justice

Resource Study Area:

The Resource Study Area for cumulative impacts on environmental justice communities includes the area where secondary or indirect impacts from construction or operations of the Build Alternative are anticipated to occur. This area is defined by 69 census tracts, measuring 52 square miles, and includes the communities of Wilmington, Harbor City, San Pedro, and Terminal Island within the city of Los Angeles, a portion of the city of Carson, and the city of Long Beach (see Figure 2.8-1 in Section 2.8, Environmental Justice of the EIR). Based on the characteristics used to evaluate the presence of environmental justice communities, the project study area contains 55 census tracts where meaningfully greater minority and/or low-income populations were identified (see Table 2.8-1 of the EIR). Therefore, the health of the resource could be classified as at risk with a substantial environmental justice population within the Resource Study Area.

Project Impact:

A full closure of the Vincent Thomas Bridge would be needed for deck replacement work requiring temporary traffic detours. Traffic detours would be required for approximately 16 months for a full or partial bridge closure. A full closure of the bridge would require all bridge traffic being diverted into neighboring communities, resulting in temporary disproportionately high and adverse effects on minority or low-income populations for cumulative traffic and air quality impacts. Implementation of the detour routes within these communities may result in temporary changes to local traffic patterns and increased traffic volumes, potentially increasing travel distances and times. Additionally, the proposed bridge deck replacement work may result in intermittent increases in construction-related dust and noise, resulting in temporary impacts to the residential areas adjacent to the project area or increased traffic and associated emissions and noise along detour routes. Traffic volumes, travel distances and times throughout the Resource Study Area and along the project detour routes may temporarily be increased with additional traffic generated from other reasonably foreseeable projects occurring simultaneously.

The implementation of the Build Alternative would maintain a reliable connection between the city of Long Beach, the community of San Pedro, and the ports. The improved

condition of the Vincent Thomas Bridge would maintain consistent employment access and mobility opportunities for all communities within the study area.

Current and Reasonably Foreseeable Future Actions:

Current and reasonably foreseeable actions in the Resource Study Area include transportation and in-fill development projects listed in Table 2.23-1 of the EIR. The majority of the identified projects would occur within designated environmental justice communities.

Construction-related impacts associated with these projects, including increased traffic, dust, air pollution, and noise, could be cumulatively considerable. However, impacts from these projects would be relatively short-term and would be minimized to the greatest extent feasible with implementation of standard construction best management practices to minimize construction dust, emissions, and noise, and the management of traffic for roadway construction.

Conclusion of Cumulative Impacts:

As noted above, implementation of the proposed Build Alternative with the full bridge closure option would result in temporary disproportionately high and adverse effects to environmental justice communities and temporary cumulatively considerable traffic and air quality impacts to environmental justice communities. In addition, the other reasonably foreseeable projects may result in temporary impacts to environmental justice communities. Temporary traffic and air quality-related impacts associated with the Build Alternative would be minimized through the application of mitigation measures MM-EJ-1, MM-EJ-2, traffic mitigation measures and project feature MM-TR-1, MM-TR-2 (outlined below), and PF-TR-1, in addition to air quality minimization measures and project feature AM-AQ-1, AM-AQ-2, and PF-AQ-1, along with general project features and best management practices. However, a temporary disproportionately high and adverse effect to environmental justice communities due to cumulatively considerable traffic and air quality impacts for the single-stage (full bridge closure) option (Preferred) are anticipated.

MM-EJ-1 Regular and ongoing coordination with agencies will occur for projects within the Community Impact Assessment Study Area to coordinate projects with overlapping construction to avoid and minimize schedule conflicts.

MM-EJ-2 Regular and ongoing community engagement will occur to address key concerns and develop strategies to reduce potential impacts to the community.

Overriding considerations that support approval of this recommended project are as follows:

Overriding considerations are based on the engineering and environmental technical analysis, the project's impact on the environment, and the comments and concerns expressed during the public review period. The Final EIR was prepared to address all

public comments and incorporate any refinements made to the project design, environmental setting, and impacts that have been identified since the Draft EIR. The purpose of the proposed project is to preserve the functionality and structural integrity of the Vincent Thomas Bridge deck and to enhance the bridge's overall safety. The proposed project would replace the bridge deck of the Vincent Thomas Bridge, upgrade seismic sensors, and improve the median barrier and guardrails. The project limits are generally bounded by the west and east approach spans of the Vincent Thomas Bridge. The proposed project limits serve as logical termini, or rational end points for transportation improvements and are sufficient to evaluate environmental impacts. However, the traffic and community impacts of the different construction staging options in Alternative 2 (Build Alternative) required evaluation outside of the project limits, particularly in the communities of Wilmington, San Pedro, Harbor City, Carson, and Long Beach.

The existing Vincent Thomas Bridge deck has structural deficiencies and a bridge deck condition rating of "poor" (Caltrans 2021a). The bridge deck rating was evaluated as "fair" until an inspection in 2021 found the deck had deteriorated to a condition rating of "poor" (Caltrans 2021a). The bridge deck of the Vincent Thomas Bridge has been in service for 60 years and is rapidly deteriorating due to concrete fatigue, primarily caused by heavy truck traffic associated with the Port of Los Angeles and the Port of Long Beach.

In addition to the deteriorating bridge deck, the existing bridge median barrier and guardrails do not meet the requirements of the new Manual for Assessing Safety Hardware, which was written by the American Association of State Highway and Transportation Officials, a nonprofit association that represents highway and transportation departments across the nation and serves as a liaison between State departments of transportation and the federal government. In addition, the seismic sensors on the bridge need to be upgraded to ensure the structural integrity of the bridge during seismic events. This work would remove the existing 26 seismic sensors and replace them with an upgraded system consisting of 44 seismic sensors.

If the current bridge deck of the Vincent Thomas Bridge were to remain in place, the existing concrete fatigue would worsen, and the nonstandard median concrete barrier and guardrails would not meet updated Manual for Assessing Safety Hardware requirements. Future emergency closures of the bridge could be possible if the current concrete fatigue of the bridge deck is not addressed. The project is needed to ensure the safety of the traveling public on the Vincent Thomas Bridge and maintain an important economic corridor to the Port of Los Angeles and the Port of Long Beach.

Caltrans has identified the single-stage construction (full bridge closure) as the preferred construction staging option within Alternative 2 (Build Alternative). This preferred staging option would be completed using the pre-cast deck options for both the approach and suspension spans resulting in an approximate construction schedule of 16 months.

The single-stage construction (full bridge closure) option was selected by the Caltrans Project Development Team for the following reasons:

- Stakeholder feedback: During the 90-day circulation period of the Draft EIR/EA Caltrans received 260 comments, many of which stated their preferred construction staging option. 39 comments stated their preference for the single stage construction (full bridge closure) option. Project stakeholders such as the Port of Los Angeles, the Port of Long Beach, International Longshore and Warehouse Union (ILWU 13, 63, 94), Harbor Trucking Association, Pacific Merchant Shipping Association, Pacific Maritime Association, Los Angeles Department of Transportation, Wilmington Neighborhood Council, Northwest San Pedro Neighborhood Council, Central San Pedro Neighborhood Council, City of Rancho Palos Verdes, and elected official Councilman Tim McOsker (Council District 15) all stated their preference for the single-stage construction (full bridge closure) option.

- Schedule duration: A closure of the Vincent Thomas Bridge (partial or full closure) would result in impacts to surrounding communities and facilities for the entire duration of construction. Caltrans, along with feedback from project stakeholders, determined that a shorter construction duration is important in limiting traffic, economic, and other impacts to surrounding communities and facilities that utilize the Vincent Thomas Bridge. The single-stage construction (full bridge closure) option has the shortest construction schedule of the construction staging options proposed. The single-stage construction (full bridge closure) option with orthotropic or pre-cast deck types would result in a 16-month construction timeline. This timeline is much faster than the 25–48-month timelines for other construction staging options.

- Worker and driver safety: A full closure of the Vincent Thomas Bridge would result in no non-construction related vehicular traffic on the bridge for the entire duration of construction. With no vehicular traffic on the bridge, staging measures to separate travel lanes from construction and reduced lane widths would not be needed. This would not only allow for a faster construction timeline, but a safer work environment for construction crews on the bridge.

Tanisha Taylor		
Executive Director	Signature	Date

References:

Caltrans. 2021a. Bridge Inspection Reports Information Search Report.

Yee, Erica and Hanna Getahun. 2022. *Hot Spot for Polluted Air: By the Numbers*. https://calmatters.org/environment/2022/02/california-environmental-justice-by-the-numbers/

Attachment E

State of California
DEPARTMENT OF TRANSPORTATION

California State Transportation Agency

MEMORANDUM

To: CHAIR AND COMMISSIONERS
CALIFORNIA TRANSPORTATION COMMISSION

CTC Meeting: December 5-6, 2024

From: STEVEN KECK, Chief Financial Officer

Reference Number: 2.2c.(5), Action Item

Prepared By: Jeremy Ketchum, Chief
Division of Environmental Analysis

Subject: **APPROVAL OF A PROJECT FOR FUTURE CONSIDERATION OF FUNDING RESOLUTION E-24-116**

ISSUE:

Should the California Transportation Commission (Commission), as a responsible agency, approve Resolution E-24-116?

RECOMMENDATION:

The California Department of Transportation (Department) recommends that the Commission, as a responsible agency, approve Resolution E-24-116.

BACKGROUND:

07-LA-47, PM 0.4/2.0
Resolution E-24-116
The attached resolution proposes to approve for future consideration of funding the following project for which a Final Environmental Impact Report (FEIR) has been completed:

- Near State Route (SR) 47 in Los Angeles County. Replace the entire bridge deck and seismic sensors of the bridge to preserve the functionality and structural integrity of the bridge deck and to enhance the bridge's overall safety. (PPNO 6024)

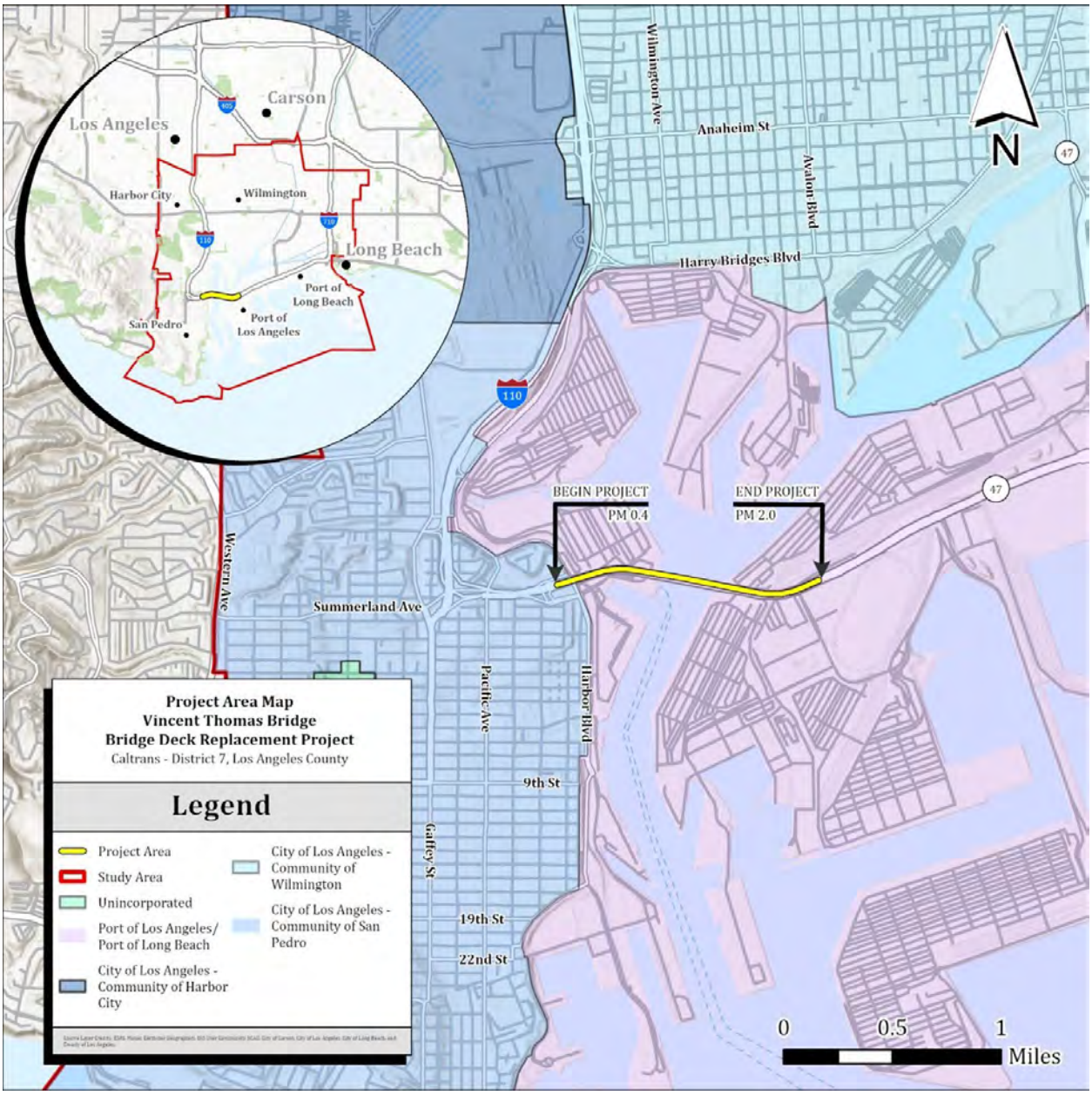
The project is located on SR 47 from postmiles (PM) 0.4 to 2.0, in Los Angeles County. The project proposes to replace the entire bridge deck and seismic sensors of the bridge to preserve the functionality and structural integrity of the bridge deck and to enhance the bridge's overall safety. The project is currently programmed in the 2024 State Highway Operation and Protection Program (SHOPP). The scope, as described for the preferred alternative, is consistent with the project scope as programmed by the Commission in the 2024 SHOPP. The total programmed amount which includes

Right of Way (Support and Capital), and Construction (Support and Capital) is $706,391,000. Construction is estimated to begin Fiscal Year 2025-26.

A copy of the FEIR has been provided to Commission staff. Resources in the project area that may be impacted by the project include air quality, biological resources, traffic and transportation, and environmental justice communities. Avoidance, minimization, and mitigation measures will reduce potential effects on the environment. These measures include, but are not limited to, ongoing monthly community engagement meetings through the Community Advisory and Technical Advisory Committees. In addition, a Transportation Management Plan and Task Force will be developed to coordinate detoured traffic before and during project construction. Additional measures include mitigation to protect nesting birds on the bridge and coordination with project area cities and agencies to repair detour routes utilized during project construction. Potential impacts associated with the project can all be mitigated to below significant, except for temporary cumulative impacts on air quality, traffic and transportation, and environmental justice communities, for which a Statement of Overriding Considerations pursuant to the California Environmental Quality Act (CEQA) was prepared. As a result, an FEIR was prepared for the project, for which a Statement of Overriding Considerations pursuant to the CEQA was prepared. As a result, an FEIR was prepared for the project.

Attachments

Attachment 1



Vincent Thomas Bridge Deck Replacement Project
To replace deteriorated bridge deck, upgrade seismic sensors, and improve the existing median barrier and railings on the Vincent Thomas Bridge on State Route 47, in the Port of Los Angeles, in Los Angeles County.

Project Name: Vincent Thomas Bridge Deck Replacement Project
DIST-CO-RTE-PM: 07-LA-SR-47-0.4/2.0
EA: 39020
EFIS ID: 0722000334

CALIFORNIA DEPARTMENT OF TRANSPORTATION FINDINGS

FOR

THE STATE ROUTE 47 VINCENT THOMAS BRIDGE DECK REPLACEMENT

PROJECT

The following information is presented to comply with State CEQA Guidelines (Title 14 California Code of Regulations, Division 6, Chapter 3, Section 15091) and the Department of Transportation and California Transportation Commission Environmental Regulations (Title 21, California Code of Regulations, Division 2, Chapter 11, Section 1501 et seq.). Reference is made to the Final Environmental Impact Report (FEIR) for the project, which is the basic source for the information.

The following effects have been identified in the EIR as resulting from the project. Effects found not to be significant have not been included.

Cumulative

Adverse Environmental Effects:

The proposed Build Alternative with the single-stage construction (full bridge closure) option would result in temporary significant cumulatively considerable air quality and traffic impacts to environmental justice communities. In addition, the other reasonably foreseeable projects in the region may result in temporary impacts to environmental justice communities.

Implementation of the proposed Build Alternative (single-stage construction) would result in temporary emissions increases affecting air quality for residents particularly due to increased use of detour routes. In addition, the other reasonably foreseeable projects in the project area may result in temporary air quality impacts.

The impacts to traffic conditions within the project area, including increased traffic congestion and delay resulting from the closure of the Vincent Thomas Bridge, would be temporary and would vary in duration and severity depending on the construction staging option implemented. The single-stage construction staging option (full bridge closure) would result in the greatest increase in intersection delay, origin-destination

travel time, and corridor VMT/vehicle-hour delay, and the greatest decrease in segment speed; therefore, temporary significant cumulatively considerable traffic impacts within the project area are anticipated with implementation of the Build Alternative (full bridge closure construction option).

Findings:

Changes or alterations have been required in, or incorporated into, the project, which avoid or substantially lessen the significant environmental effect as identified in the final EIR.

Statement of Facts:

The project includes measures to address direct temporary impacts to traffic flow in the project area, including coordination with other agencies on targeted pavement rehabilitation of detour routes, intersection improvements, and the implementation of a Transportation Management Plan (TMP). In addition, regular coordination with other agencies and projects regarding construction timing and potential traffic detours, along with regular community engagement would provide a managed effort to inform the public and to maintain traffic flow and transit service through the project area, thereby minimizing potential temporary cumulative transportation impacts. Temporary construction-related air quality impacts would be minimized through the application of construction equipment emissions reduction measures; however, temporary cumulatively considerable impacts to air quality and traffic for the Build Alternative with the full bridge closure option are anticipated.

Transportation

Adverse Environmental Effects:

Transportation projects that reduce, or have no impact on, vehicle miles traveled (VMT) should be presumed to cause a less than significant transportation impact. This project's Build Alternative has four different construction staging options. The two-stage, three-stage, and full nighttime closure construction options would maintain existing conditions upon completion and would have no permanent impact on VMT. Temporary closures of the bridge would slightly increase VMT for some origin and destination routes that otherwise would have used the Vincent Thomas Bridge.

The single-stage (full-closure) construction option would maintain existing conditions upon completion and would have no permanent impact on VMT. The temporary closure of the entire bridge would not measurably increase VMT in the project area; however, the increase of 0.12 percent in VMT from the baseline for the project area is larger than the other three construction staging options being considered.

Findings:

Changes or alterations have been required in, or incorporated into, the project, which avoid or substantially lessen the significant environmental effect as identified in the final EIR.

Statement of Facts:

The two-stage, three-stage, and full nighttime closure construction options would maintain existing conditions upon completion and would have no permanent impact on VMT. Temporary closures of the bridge would slightly increase VMT for some origin and destination routes that otherwise would have used the Vincent Thomas Bridge; however, these impacts are minimal and would be further minimized by project measures (coordination with other agencies on targeted pavement rehab of detour routes, intersection improvements, and a TMP); therefore, these construction staging options would result in a less than significant impact.

The single-stage (full-closure) construction option would maintain existing conditions upon completion and would have no permanent impact on VMT. The temporary closure of the entire bridge would not measurably increase VMT in the project area; however, the increase of 0.12 percent in VMT from the baseline for the project area is larger than the other three construction staging options being considered. The Build Alternative would result in a temporary less than significant impact with mitigation incorporated to the VMT guidance in *State CEQA Guidelines* Section 15064.3, subdivision (b) for the single-stage (full-closure) option.

Implementation of strategies including regular coordination with other agencies and projects regarding construction timing and potential traffic detours, along with regular community engagement would provide a managed effort to inform the public and to maintain traffic flow and transit service through the project area, thereby minimizing potential temporary transportation impacts.

Biology

Adverse Environmental Effects:

The proposed project would interfere with bird nesting by occupying the same space in which nesting would occur. Since the project must place platforms under the bridge deck to capture demolition debris and prevent that debris from entering the channel, there would be a substantial amount of human activity around the area that birds, especially the peregrine falcon, nest. This heightened activity would cause disturbance to the birds. The construction of the debris catchment system would also impede access to space under the bridge deck, making ingress and egress to that space difficult for nesting birds. Demolishing the bridge deck would also cause debris to fall onto and

around the existing nest and/or newly constructed nests, which could cause nest failure, and which would also interfere with nesting. Lastly the noise from concrete demolition and other activities would harass the nesting birds, since it would occur within 150 to 500 feet of the nest or closer. With implementation of the measures below, the impacts to bird (peregrine falcon) habitat would be less than significant with mitigation incorporated.

Findings:

Changes or alterations have been required in, or incorporated into, the project, which avoid or substantially lessen the significant environmental effect as identified in the final EIR.

Statement of Facts:

With implementation of the measures below, the impacts to bird (peregrine falcon) habitat would be less than significant.

- To prevent the project from interrupting nesting and causing nest failure, which would result in a substantial waste of energy and decreased ease of reproduction for peregrine falcon, Caltrans would install nesting exclusionary devices on the bridge prior to the nesting season in which construction is planned to occur. These devices shall be installed prior to the initiation of demolition activities within 500 feet of existing nesting locations. If existing nesting sites are occupied, then exclusion activities shall not occur until after the last young leave the nests. The exclusionary devices would prevent the falcon and other birds from attempting to nest on the bridge. Specifications of the exclusionary devices will be determined during the design phase of the project in coordination with CDFW and USFWS to ensure efficacy and safety.

- A biologist with experience in surveying and monitoring avian activity will survey the bridge and its surroundings prior to construction if it occurs during the bird nesting season (February 1st to September 1st). A lapse in construction is not planned, but if there is a lapse in construction for longer than 3 days, a repeat survey would be performed. If birds are observed attempting to nest on the bridge, then a no-work buffer around the nest would be implemented and Caltrans would conduct consultation with the United States Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW).

- A biologist will monitor the bridge during construction for signs of whether birds are nesting on the bridge. They will keep track of nesting birds on the bridge and evaluate whether construction has the potential to or is disturbing nesting birds. The biological monitor will also observe construction to ensure that construction best management practices (BMPs) are applied to prevent incidental effects to the channel, water quality, and jurisdictional waters.

- If nests are found on the Vincent Thomas Bridge, a qualified biologist shall monitor the nests weekly during the Project and shall send monitoring reports to CDFW.

- A qualified biologist will make a presentation to construction staff who are on site for longer than 30 minutes. The staff will be advised on the bird species that have been known to occur in the project area, their nest appearance and siting factors, the project's conservation measures, and the procedures for reporting and avoiding nesting migratory birds.

- If night work is necessary, it shall be limited, and light shall be downcast and shielded to avoid unnecessary illumination of non-active work areas.

- Compensatory Avoidance Measure. Prior to the nesting season in which construction is planned to occur, Caltrans will construct an artificial nest platform outside of the project impact area within the Port of Long Beach/Port of Los Angeles complex to compensate for the temporary loss of the nesting space on the Vincent Thomas Bridge. The artificial nest platform will likely be placed close to the bridge so that falcons that repeatedly nest on the Vincent Thomas Bridge are aware of the artificial nesting platform. The platform would be constructed in a way and at a site that would make it suitable for peregrine falcon nesting, taking into consideration the elevation, the visibility of the platform, and other site characteristics. Potential nest platform sites will be discussed in consultation with the CDFW. The artificial nest platform shall remain in place after Project completion.

Gloria Roberts		10/24/2024
District Director (or designee)	Signature	Date

Project Name: Vincent Thomas Bridge Deck Replacement Project
DIST-CO-RTE-PM: 07-LA-SR-47-0.4/2.0
EA: 39020
EFIS ID: 0722000334

CALIFORNIA DEPARTMENT OF TRANSPORTATION
STATEMENT OF OVERRIDING CONSIDERATIONS

FOR

THE VINCENT THOMAS BRIDGE (VTB) DECK REPLACEMENT PROJECT ON SR-47

IN LOS ANGELES COUNTY TO REPLACE THE ENTIRE BRIDGE DECK, IMPROVE

THE MEDIAN BARRIERS/RAILINGS, AND UPGRADE THE SEISMIC SENSORS.

The following information is presented to comply with State CEQA Guidelines (Title 14 California Code of Regulations, Division 6, Chapter 3, Section 15093), and the Department of Transportation and California Transportation Commission Environmental Regulations (Title 21 California Code of Regulations, Division 2, Chapter 11, Section 1501 et seq.). Reference is made to the Final Environmental Impact Report (FEIR) for the project, which is the basic source for the information.

The following impacts have been identified as significant and not fully mitigable:

Cumulative Impacts

The Build Alternative proposes to replace the deck of the Vincent Thomas Bridge, replace the median concrete barriers, fencing, and guardrails, and upgrade the bridge's seismic sensors. The cumulative impact analysis determines whether the Build Alternative, in combination with other past, present, or reasonably foreseeable projects, would result in a cumulative effect and, if so, whether the Build Alternative's contribution to the cumulative impact would be considerable.

A Resource Study Area (RSA) corresponds to a geographic area cumulative impact that a particular resource can be analyzed within. Only active projects, defined as currently under construction or planned, were considered within each RSA. These projects were identified using information obtained from Caltrans and agency websites within the RSA. The identified projects are located in the Port of Los Angeles (POLA), Port of Long Beach (POLB), and the cities of Los Angeles, Long Beach, and Carson. The projects included are those that could contribute to cumulative impacts within the study area for each respective resource analyzed in the Final EIR (see Table 2.23-1 of the Final EIR).

The following resources were evaluated for cumulative impacts:

Air Quality

Resource Study Area:

The RSA for air quality cumulative impacts is a roughly 52-square-mile area that includes the communities of Wilmington, Harbor City, San Pedro, and Terminal Island within the city of Los Angeles, a portion of the cities of Carson and Long Beach, and both POLA and POLB. The RSA encompasses the area where secondary or indirect impacts from construction or operations of the Build Alternative are anticipated to occur, including the proposed detour routes that would be necessary to divert traffic from the bridge during project construction.

While air quality within the region has been improving, due to local and State rules, which have resulted in cleaner emission cars and industries, the residents of Wilmington, Carson, and West Long Beach are located adjacent to several sources of pollution, including POLA and POLB, five oil refineries, nine rail yards, four major freeways, several chemical facilities, and the third largest oilfield in the contiguous United States (Yee and Getahun 2022). The POLA and POLB are the two busiest ports in the nation and have seen increases in congestion due to increased cargo imports and supply chain disruptions. This has resulted in more anchored ships running on auxiliary engines waiting to dock along with the increased truck and train activity to move the cargo. Therefore, the overall health of the resource within the RSA could be classified as in poor health, declining health, or at risk.

Project Impact:

As discussed in Section 2.13 of the EIR (Air Quality), implementation of the Build Alternative would result in no appreciable long-term difference in air quality conditions between the Build and No Build Alternatives because the project is not expected to permanently change the vehicle capacity or traffic patterns on the Vincent Thomas Bridge or surrounding roads. The proposed project would have no effect on long-term mobile source emissions in the region. There is no potential for an increase in permanent emissions that could contribute to cumulative emissions or interfere with air quality plans that are designed to reduce cumulative air quality impacts.

There is the potential that local and regional air quality would be temporarily affected for 16 months during construction of the Build Alternative. Emissions from construction equipment powered by gasoline and diesel engines would include carbon monoxide (CO), nitrogen oxides (NO_X), volatile organic compounds (VOCs), minimal amounts of sulfur oxides (SO_X), directly emitted $PM_{2.5}$, particulate matter less than 10 microns in size (PM_{10}), and toxic air contaminants (TACs) such as diesel exhaust particulate matter (DPM). These emissions would be temporary and limited to the immediate area surrounding the construction site. Short-term degradation of air quality may also occur from the release of particulate emissions (airborne dust) generated by demolition, hauling, and other activities related to construction; however, the potential for these emissions to affect sensitive receptors would be very low due to construction occurring

predominantly within the existing bridge structure footprint. As shown in Table 2.13-9 of the EIR, the temporary increases in emissions and incremental changes in PM_{10} concentrations within the RSA communities would remain below applicable regulatory thresholds for all construction scenarios. Additionally, the effects of the temporary construction-related emissions would be minimized with implementation of the following measures (identified as AM-AQ-1, AM-AQ-2, and PF-AQ-1 in the EIR):

The construction contractor must comply with the Caltrans' Standard Specifications in Section 14-9 (2023):

- Section 14-9-02 specifically requires compliance by the contractor with all applicable laws and regulations related to air quality, including air pollution control district and air quality management district regulations and local ordinances.
- Section 14-9.05 requires identification of the local air quality jurisdiction (South Coast Air Quality Management District [SCAQMD]) and for the contract to comply with all applicable rules and best management practices (BMPs).
- The construction contractor must also comply with Caltrans project-specific NSSPs 5-1.33 and 7-1.02C, which require that off-road construction equipment be outfitted with engines meeting Tier 4 emissions standards and that all certification and maintenance documentation be provided prior to equipment use. Implementation of these NSSPs would reduce emissions of ozone precursors and criteria pollutants (primarily particulate matter and NO_X) during construction activities.
- Construction equipment and vehicles will be properly tuned and maintained. All construction equipment will use low sulfur fuel as required by 17 California Code of Regulations (CCR) Section 93114.
- The construction contractor must comply with SCAQMD rules, including Rule 401 (Visible Emissions), Rule 402 (Nuisance), Rule 403 (Fugitive Dust), and Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities).
- Diesel-powered off-road equipment shall limit idling in accordance with the California Air Resources Board (CARB) "Regulation for In-Use Off-Road Diesel-Fueled Fleets" (13 CCR Section 2449).
- Diesel-powered on-road vehicles and trucks shall limit idling in accordance with the CARB "Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling" (13 CCR Section 2485)."

The proposed project is located within one of the identified Assembly Bill (AB) 617 communities (Wilmington/Long Beach/Carson) for which the CARB is required to establish a program to reduce air pollution exposure. To help address public health disparities in these communities, Caltrans requires construction equipment to have engines that comply with United States Environmental Protection Agency (EPA) Tier 4 emission standards for off-road diesel-fueled vehicles. The proposed project will incorporate two NSSPs to ensure that contractors use equipment outfitted with Tier 4

engines during construction (7-1.02C) and that all appropriate certification documentation is provided for use authorization (5-1.33).

Current and Reasonably Foreseeable Future Actions:

Current and reasonably foreseeable actions in the RSA include transportation and in-fill development projects listed in Table 2.23-1 of the EIR. There is the potential for temporary increases in construction-related emissions during the construction of each project. However, the construction-related impacts from these projects would be relatively short term and would be minimized to the greatest extent feasible with implementation of standard construction BMPs to minimize construction emissions. Implementation of these projects would add additional employment locations, residential units, commercial and recreational facilities, and increased port operations. This anticipated growth would likely result in an increase in traffic and associated vehicle emissions within the RSA due to more vehicles traveling to/from and within the RSA. In addition, proposed projects at the ports would result in increases in criteria pollutant emissions compared to current levels due to increased ship, rail, and truck operations at the ports.

Conclusion of Cumulative Impacts:

As noted above, implementation of the proposed Build Alternative would not result in an increase in permanent emissions but would result in temporary emission increases affecting air quality for residents. In addition, the other reasonably foreseeable projects may result in temporary air quality impacts. With the implementation of AM-AQ-1, AM-AQ-2, PF-AQ-1 (see above), NSSPs, and BMPs, temporary air quality impacts associated with the proposed project would be minimized; however, temporary cumulatively considerable air quality impacts within the RSA are anticipated with implementation of the Build Alternative.

Traffic and Transportation

Resource Study Area:

The RSA for transportation-related cumulative impacts is a roughly 52-square-mile area that includes the communities of Wilmington, Harbor City, San Pedro, and Terminal Island within the city of Los Angeles, and a portion of the city of Carson, and the city of Long Beach, and both POLA and POLB. The RSA encompasses the proposed detour routes that would be necessary to divert traffic from the bridge during project construction. The conceptual detour routes include Sepulveda Boulevard between Interstate 710 (I-710) and Interstate 110 (I-110), Pacific Coast Highway (PCH) between SR-47 and I-110, Harry Bridges Boulevard/Alameda Street/E. Anaheim Street between SR-47 and I-110, and portions of State Route 103 (SR-103), SR-47, I-110, and I-710 between the Vincent Thomas Bridge and Sepulveda Boulevard. Within the RSA, 50 of the 59 intersections are controlled with either traffic signals or stop controls (see Section 2.10 of the EIR). The sum of traffic volumes entering all the study intersections varies between approximately 158,000 vehicles in the AM peak hour to approximately 162,000 vehicles in the PM peak hour. Existing traffic conditions within the RSA show that the

majority of intersections operate at a level of service (LOS) D or better during weekday AM, mid-day (MD), and PM peak hours, with only 10 of 50 intersections operating at a LOS E or F in the AM peak hour and 12 of 50 operating at LOS E or F in the PM peak hour. Based on the current operational conditions within the RSA, the overall traffic conditions are not classified as in poor health, declining health, or at risk.

Project Impacts:

Traffic analysis indicates that the Build Alternative would result in increased congestion at intersections throughout the RSA for all peak periods. Congestion is determined by adding the change in vehicle delay at intersections plus the change in LOS. The average delay increase is 37 percent compared to the baseline for the single-stage option (full bridge closure).

Similarly, the projected traffic increases along the proposed detour routes during the peak periods would vary by staging option, with the PM peak period showing the greatest increases. On Sepulveda Boulevard, the increase in traffic during the PM peak period would range from 97 to 270 vehicles, on PCH the increase in vehicles would range from 113 to 414, while Harry Bridges Boulevard would experience the greatest increase in detoured traffic with 315 to 762 additional vehicles. Average speeds along all roadway segments would be reduced during all peak periods with the single-stage option (full bridge closure) resulting in the greatest reduction. During the construction period, there would be a small increase in vehicle miles traveled (VMT), of up to a 0.12 percent increase for the single-stage construction option.

Following completion of the improvements associated with the Build Alternative, the Vincent Thomas Bridge would maintain its existing configuration, and traffic patterns would not be altered. Therefore, implementation of the project would not induce additional VMT within the RSA.

Current and Reasonably Foreseeable Future Actions:

Current and reasonably foreseeable actions in the RSA include transportation and the in-fill development projects listed in Table 2.23-1 of the EIR. For traffic analysis purposes, the SR-47/Vincent Thomas Bridge and Front Street/Harbor Boulevard Interchange Reconfiguration Project (#7) along with lane reductions along Alameda Street between Harry Bridges Boulevard and PCH (#12) were assumed complete and were included as part of the baseline condition. The identified development projects within the ports and surrounding communities would add additional employment locations, residential units, and commercial and recreational facilities. This anticipated growth would likely result in an increase in vehicular traffic within the RSA due to more vehicles traveling to/from and within the RSA. In addition, construction of several of the identified roadway projects, including the Alameda Street South Improvement Project, Alameda Street North Improvement Project, Westbound Anaheim Street Widening, ADA improvements along PCH, and SR-103 Pavement Preservation Project may overlap with the anticipated construction timeline for the Vincent Thomas Bridge Deck Replacement Project. This project construction overlap may result in additional street or

lane closures and/or detours occurring at the same time as the closure of the Vincent Thomas Bridge, thereby contributing to additional congestion and delay throughout the RSA and resulting in temporary cumulative traffic impacts.

Conclusion of Cumulative Impacts:

The impacts to traffic conditions within the RSA, including increased traffic congestion and delay resulting from the closure of the Vincent Thomas Bridge, would be temporary and would vary in duration and severity depending on the construction staging option implemented. The single-stage construction staging option (Preferred) would result in the greatest increase in intersection delay, origin-destination travel time, and corridor VMT/vehicle-hour delay, and the greatest decrease in segment speed.

As stated above, other current and foreseeable projects within the RSA would contribute to additional traffic congestion and delay; however, these projects would be required to include measures to mitigate for impacts to traffic and transportation. The proposed project would include mitigation measures MM-TR-1 and MM-TR-2 along with PF-TR-1 to address direct temporary impacts to traffic flow in the RSA (see below). In addition, implementation of the strategies identified in MM-EJ-1 and MM-EJ-2 (including regular coordination with other agencies and projects regarding construction timing and potential traffic detours) along with regular community engagement would provide a managed effort to inform the public and to maintain traffic flow and transit service through the RSA, thereby minimizing potential temporary cumulative transportation impacts. The Community Advisory Committee (CAC) and Technical Advisory Committee (TAC) will continue to meet throughout the duration of project construction providing additional opportunities for communication and coordination with various agencies to manage projects with overlapping construction to avoid and minimize schedule conflicts.

Temporary construction-related impacts would be minimized through the application of identified measures; however, temporary cumulatively considerable impacts to traffic and transportation for the Build Alternative with the full bridge closure option are anticipated.

MM-TR-1 **Temporary Restriping and Signal Synchronization of Identified Intersections.** The Traffic Operations Analysis Report (TOAR) (2024) outlines potential improvements that can been developed at 12 intersections within the Community Impact Assessment (CIA) (2024) Study Area. The potential temporary improvements involve restriping, minimal geometric reconfigurations, and signal phasing modifications. A detailed analysis of restriping at the identified 12 intersections can be found in the TOAR (2024) and is available upon request.

The temporary modification of intersections outside of Caltrans right-of-way would be dependent on approval by all respective local jurisdictional agencies. Caltrans will coordinate with local jurisdictional agencies regarding this measure.

MM-TR-2 **Repairing Detour Routes.** Caltrans will partner with the City of Los Angeles to seek opportunities to repair detour routes prior to and after the construction of the project.

The repair of detour routes outside of Caltrans right-of-way would be dependent on approval by all respective local jurisdictional agencies. Caltrans will coordinate with local jurisdictional agencies regarding this measure.

PF-TR-1 **Transportation Management Plan**

The Transportation Management Plan (TMP) will designate the detour route(s) to be utilized during construction. The TMP and detour routes will potentially change during project construction to respond to real-time conditions and feedback from the community and stakeholders. The TMP will be developed in coordination with local agencies and project stakeholders in the Design and Construction phases of the project through the project Technical Advisory and Community Advisory Committees (MM-EJ-1, MM-EJ-2).

a. **Changeable Message Signs (CMS).** Permanent overhead message signs are located along roadways approaching the project area to notify road users of lane and road closures on the bridge, work activities, traffic incidents, potential work zone hazards, traffic queues (backups), travel times, or delay information, as well as alternate routes in or around the work zone.

b. **Portable Changeable Message Signs (PCMS).** PCMS will be placed at key locations to notify motorists of lane closures, alternate routes, expected delay, and upcoming road closures on the bridge. These signs will be used to inform drivers of speed limit reductions and enforcement activities in a work zone, as well as projected delay or road opening times.

Environmental Justice

Resource Study Area:

The RSA for cumulative impacts on environmental justice communities includes the area where secondary or indirect impacts from construction or operations of the Build Alternative are anticipated to occur. This area is defined by 69 census tracts, measuring 52 square miles, and includes the communities of Wilmington, Harbor City, San Pedro, and Terminal Island within the city of Los Angeles, a portion of the city of Carson, and the city of Long Beach (see Figure 2.8-1 in Section 2.8, Environmental Justice of the EIR). Based on the characteristics used to evaluate the presence of environmental justice communities, the project study area contains 55 census tracts where meaningfully greater minority and/or low-income populations were identified (see Table

2.8-1 of the EIR). Therefore, the health of the resource could be classified as at risk with a substantial environmental justice population within the RSA.

Project Impact:

A Full closure of the Vincent Thomas Bridge would be needed for deck replacement work requiring temporary traffic detours. Traffic detours would be required for approximately 16 months for a full or partial bridge closure.

A full closure of the bridge would require all bridge traffic being diverted into neighboring communities, resulting in temporary disproportionately high and adverse effects on minority or low-income populations for cumulative traffic and air quality impacts. Implementation of the detour routes within these communities may result in temporary changes to local traffic patterns and increased traffic volumes, potentially increasing travel distances and times. Additionally, the proposed bridge deck replacement work may result in intermittent increases in construction-related dust and noise, resulting in temporary impacts to the residential areas adjacent to the project area or increased traffic and associated emissions and noise along detour routes. Traffic volumes, travel distances and times throughout the RSA and along the project detour routes may temporarily be increased with additional traffic generated from other reasonably foreseeable projects occurring simultaneously.

The implementation of the Build Alternative would maintain a reliable connection between the city of Long Beach, the community of San Pedro, and the ports. The improved condition of the Vincent Thomas Bridge would maintain consistent employment access and mobility opportunities for all communities within the study area.

Current and Reasonably Foreseeable Future Actions:

Current and reasonably foreseeable actions in the RSA include transportation and in-fill development projects listed in Table 2.23-1 of the EIR. The majority of the identified projects would occur within designated environmental justice communities. Construction-related impacts associated with these projects, including increased traffic, dust, air pollution, and noise, could be cumulatively considerable. However, impacts from these projects would be relatively short-term and would be minimized to the greatest extent feasible with implementation of standard construction BMPs to minimize construction dust, emissions, and noise, and the management of traffic for roadway construction.

Conclusion of Cumulative Impacts:

As noted above, implementation of the proposed Build Alternative with the full bridge closure option would result in temporary disproportionately high and adverse effects to environmental justice communities and temporary cumulatively considerable traffic and air quality impacts to environmental justice communities. In addition, the other reasonably foreseeable projects may result in temporary impacts to environmental

justice communities. Temporary traffic and air quality-related impacts associated with the Build Alternative would be minimized through the application of mitigation measures MM-EJ-1, MM-EJ-2, traffic mitigation measures and project feature MM-TR-1, MM-TR-2 (outlined below), and PF-TR-1, in addition to air quality minimization measures and project feature AM-AQ-1, AM-AQ-2, and PF-AQ-1, along with general project features and BMPs. However, a temporary disproportionately high and adverse effect to environmental justice communities due to cumulatively considerable traffic and air quality impacts for the single-stage (full bridge closure) option (Preferred) are anticipated.

MM-EJ-1 Regular and ongoing coordination with agencies will occur for projects within the CIA Study Area to coordinate projects with overlapping construction to avoid and minimize schedule conflicts.

MM-EJ-2 Regular and ongoing community engagement will occur to address key concerns and develop strategies to reduce potential impacts to the community.

Overriding considerations that support approval of this recommended project are as follows:

Overriding considerations are based on the engineering and environmental technical analysis, the project's impact on the environment, and the comments and concerns expressed during the public review period. The Final EIR was prepared to address all public comments and incorporate any refinements made to the project design, environmental setting and impacts that have been identified since the Draft EIR.

The purpose of the proposed project is to preserve the functionality and structural integrity of the Vincent Thomas Bridge deck and to enhance the bridge's overall safety.

The proposed project would replace the bridge deck of the Vincent Thomas Bridge, upgrade seismic sensors, and improve the median barrier and guardrails. The project limits are generally bounded by the west and east approach spans of the Vincent Thomas Bridge. The proposed project limits serve as logical termini, or rational end points for transportation improvements and are sufficient to evaluate environmental impacts. However, the traffic and community impacts of the different construction staging options in Alternative 2 (Build Alternative) required evaluation outside of the project limits, particularly in the communities of Wilmington, San Pedro, Harbor City, Carson, and Long Beach.

The existing Vincent Thomas Bridge deck has structural deficiencies and a bridge deck condition rating of "poor" (Caltrans 2021a). The bridge deck rating was evaluated as "fair" until an inspection in 2021 found the deck had deteriorated to a condition rating of "poor" (Caltrans 2021a). The bridge deck of the Vincent Thomas Bridge has been in service for 60 years and is rapidly deteriorating due to concrete fatigue, primarily

caused by heavy truck traffic associated with the POLA and Port of Long Beach (POLB).

In addition to the deteriorating bridge deck, the existing bridge median barrier and guardrails do not meet the requirements of the new Manual for Assessing Safety Hardware (MASH), which was written by the American Association of State Highway and Transportation Officials (AASHTO). AASHTO is a nonprofit association that represents highway and transportation departments across the nation and serves as a liaison between State departments of transportation and the federal government. In addition, the seismic sensors on the bridge need to be upgraded to ensure the structural integrity of the bridge during seismic events. This work would remove the existing 26 seismic sensors and replace them with an upgraded system consisting of 44 seismic sensors.

If the current bridge deck of the Vincent Thomas Bridge were to remain in place, the existing concrete fatigue would worsen, and the nonstandard median concrete barrier and guardrails would not meet updated MASH requirements. Future emergency closures of the bridge could be possible if the current concrete fatigue of the bridge deck is not addressed. The project is needed to ensure the safety of the traveling public on the Vincent Thomas Bridge and maintain an important economic corridor to POLA and POLB.

Caltrans has identified the single-stage construction (full bridge closure) as the preferred construction staging option within Alternative 2 (Build Alternative). This preferred staging option would be completed using the pre-cast deck options for both the approach and suspension spans resulting in an approximate construction schedule of 16 months.

The single-stage construction (full bridge closure) option was selected by the Caltrans Project Development Team (PDT) for the following reasons:

- **Stakeholder feedback:** During the 90-day circulation period of the Draft EIR/EA Caltrans received 260 comments, many of which stated their preferred construction staging option. 39 comments stated their preference for the single-stage construction (full bridge closure) option. Project stakeholders such as the Port of Los Angeles (POLA), the Port of Long Beach (POLB), International Longshore and Warehouse Union (ILWU 13, 63, 94), Harbor Trucking Association, Pacific Merchant Shipping Association, Pacific Maritime Association, Los Angeles Department of Transportation (LADOT), Wilmington Neighborhood Council, Northwest San Pedro Neighborhood Council, Central San Pedro Neighborhood Council, City of Rancho Palos Verdes, and elected official Councilman Tim McOsker (Council District 15) all stated their preference for the single-stage construction (full bridge closure) option.

- **Schedule duration:** A closure of the Vincent Thomas Bridge (partial or full closure) would result in impacts to surrounding communities and facilities for the entire duration of construction. Caltrans, along with feedback from project

stakeholders, determined that a shorter construction duration is important in limiting traffic, economic, and other impacts to surrounding communities and facilities that utilize the Vincent Thomas Bridge. The single-stage construction (full bridge closure) option has the shortest construction schedule of the construction staging options proposed. The single-stage construction (full bridge closure) option with orthotropic or pre-cast deck types would result in a 16-month construction timeline. This timeline is much faster than the 25–48-month timelines for other construction staging options.

- **Worker and driver safety:** A full closure of the Vincent Thomas Bridge would result in no non-construction related vehicular traffic on the bridge for the entire duration of construction. With no vehicular traffic on the bridge, staging measures to separate travel lanes from construction and reduced lane widths would not be needed. This would not only allow for a faster construction timeline, but a safer work environment for construction crews on the bridge.

Gloria Roberts		10/24/2024
District Director (or designee)	Signature	Date