



I-10 LAKE CHARLES CALCASIEU RIVER BRIDGE

Record of Decision

I-10 Calcasieu River Bridge Improvements

(I-10/I-210 West End to I-10/I-210 East End)

Calcasieu Parish, Louisiana

State Project Number: H.003931

January 12, 2024



H.003931 I-10 Calcasieu River Bridge Improvements Record of Decision

The Federal Highway Administration (FHWA) concurs with the Louisiana Department of Transportation and Development (LADOTD) in the choice of the Selected Alternative developed and analyzed as part of the Environmental Impact Statement (EIS) process. The Selected Alternative is Alternative 5G. FHWA is the lead Federal agency under the National Environmental Policy Act (NEPA). LADOTD is the state agency responsible for the Project, and the U.S. Army Corps of Engineers (USACE), the Federal Railroad Administration (FRA), and the U.S. Coast Guard (USCG) are Cooperating Agencies. The EIS process produced the I-10 Calcasieu River Bridge Improvements Project (Project) Draft Environmental Impact Statement (DEIS) signed November 2, 2022, the Final Environmental Impact Statement (FEIS) signed September 20, 2023, and concludes with this Record of Decision (ROD) document.

This ROD summarizes the process, the Project, the alternatives considered, the mitigation measures proposed, the opportunities to comment, the comments received, and the responses provided. This ROD documents the basis for FHWA's decision regarding compliance with relevant environmental requirements and the proposed mitigation measures.

Alternative 5G is the least costly to build, supports the Project's Purpose and Need, has the fewest overall environmental impacts, and is supported by the public, agencies, and stakeholders. Therefore, Alternative 5G was chosen by FHWA as the Preferred Alternative in the FEIS. With consideration of the social, economic, and environmental impacts of the Project as evaluated in the DEIS and defined in the project documentation and technical analyses, as well as on public comments and agency consultation, it is the decision of FHWA to further approve Alternative 5G in this ROD as the Selected Alternative. The Selected Alternative consists of a new I-10 Calcasieu River Bridge and improvements to the interstate roadways and ramps, the I-10 service roads, and interchanges at PPG Drive, North Lakeshore/Ryan Street, Enterprise Boulevard, and Opelousas Street. To accommodate six lanes of I-10 under US Highway 171 (US 171), the overpass would be reconstructed but the existing loop ramps would not be modified.

This approval is conditioned on compliance with the commitments described in the Permits, Mitigation, and Commitments section of the DEIS document along with policies and guidelines.

January 30, 2024

Date of Approval

Federal Highway Administration

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RECORD OF DECISION (ROD)

1. INTRODUCTION

This Record of Decision (ROD) was prepared as part of the Environmental Impact Statement (EIS) review process for the Interstate 10 (I-10) Calcasieu River Bridge Improvements Project (Project) in Calcasieu Parish, Louisiana, in accordance with the National Environmental Policy (NEPA) and other regulatory requirements. The ROD documents the selection of and approval by the Federal Highway Administration (FHWA) of the Selected Alternative (Alternative 5G) for the Project.

The Project proposes to improve I-10 between the I-10/Interstate 210 (I-210) west and I-10/I-210 east interchanges in Calcasieu Parish, LA (**Figure ROD-1**). The interstate is a controlled access, divided highway with four to six lanes. The Project Corridor includes the I-10 Calcasieu River Bridge that connects the cities of Lake Charles and Westlake. The bridge was built almost 70 years ago and the interstate almost 60 years ago. The bridge was rehabilitated in 2011-2012, which extended its life expectancy.

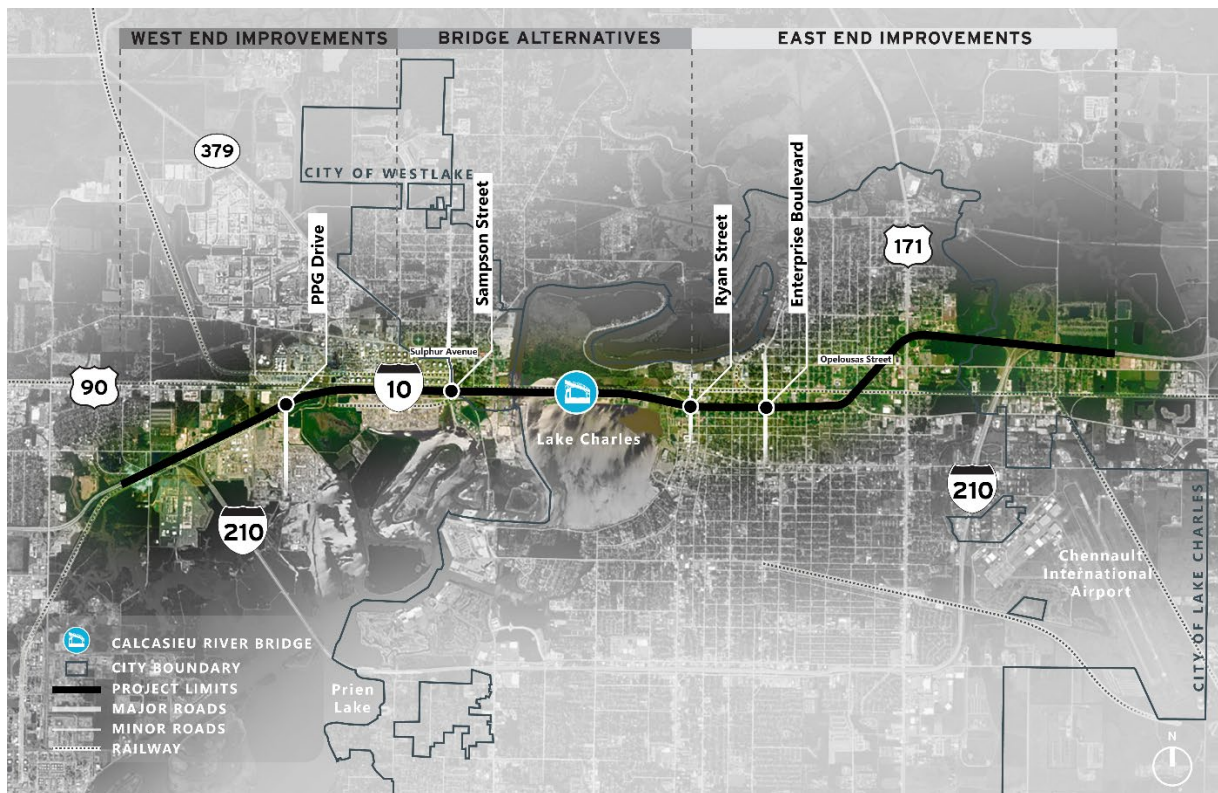


Figure ROD-1: Project Extents

The Project proposes to reconstruct the I-10 Calcasieu River Bridge and the interstate within the Project limits to provide a minimum of six lanes of interstate between the interchanges at I-210 West End and I-210 East End. Reconstruction of the system would include several overpasses, interchange ramps, and service roads to ensure that the vertical clearance, horizontal alignment,

acceleration, deceleration, weaving distances, and other road and bridge elements meet current design guidelines to the extent practicable. To accommodate six lanes of I-10 under US Highway 171 (US 171), the overpass would be reconstructed but the existing loop ramps would not be modified.

The Project length is approximately nine miles and includes interstate roadways and ramps, the bridge approaches, the I-10 service roads, and interchanges at PPG Drive, Sampson Street, North Lakeshore/Ryan Street, Enterprise Boulevard, and Opelousas Street that connect the interstate to state roads and local streets.

The purpose of the ROD is to state the basis for a project decision, summarize mitigation measures that will be incorporated in the Project, and document any required Section 4(f) approval. The ROD applies to the Preferred Alternative 5G described, evaluated, and recommended in the Draft Environmental Impact Statement (DEIS); identified as the Preferred Alternative in the Final Environmental Impact Statement (FEIS); and approved as the Selected Alternative by this ROD document. The ROD also incorporates by reference all technical reports and supporting documentation for the Selected Alternative 5G. This ROD is the decision document that concludes the NEPA process for the Project.

2. PURPOSE AND NEED

The Purpose and Need of the I-10 Calcasieu River Bridge Improvements Project is to:

- address the lack of system continuity on I-10 and along Sampson Street;
- reduce congestion and improve mobility on I-10 and along Sampson Street;
- address structural and functional roadway and bridge deficiencies; and
- address safety concerns on I-10 and the Calcasieu River Bridge.

It is noted that the safety analyses did not indicate a statistically significant safety benefit for any alternative that would meet the Purpose and Need for safety and independently justify the proposed Project. However, a comparative safety analysis indicates that the Selected Alternative 5G will meet current design standards for safety. See FEIS Section 4 DEIS Errata Sheets, no. 13, on page FEIS-27.

Details on the iterative process that resulted in the Purpose and Need statement is located in Appendix A of the DEIS and on the Project website's document library at <https://www.i10lakecharles.com/documentlibrary>.

3. ALTERNATIVES

3.1. Alternatives Development and Analysis

Build Alternatives were developed, evaluated, and screened based on methodology and criteria, including consistency with the Project's Purpose and Need. The development of alternatives began in 2000 with an environmental and engineering feasibility study. The Comprehensive Preliminary Alternatives Analysis was prepared in 2002. The discovery of ethylene dichloride (EDC) contamination within the right of way (ROW) near I-10 at Sampson Street also played a role in development of the preliminary alternatives. Improvements needed to meet the Project's Purpose and Need were identified from I-210 West End to I-210 East End and at the Sampson Street interchange.

3.2. Development of Build Alternative Options and the No Build Alternative

After several stages of alternatives development and refinement including a Feasibility Study, multiple bridge height and engineering studies, and public and agency coordination, a wide range of alternatives for the Project were proposed. In accordance with NEPA, these preliminary alternatives represented the full spectrum of solutions that would be explored and objectively evaluated for the Project.

Conceptual in nature, early alternatives considered non-structural solutions that could utilize existing infrastructure and address the Purpose and Need without building anything new. The first condition for any early alternative to be considered was that it met the Purpose and Need for the Project. Preliminary structural alternatives also had to be feasible, that is, constructible based on current design guidelines and best practices. After detailed assessment and elimination of sub-alternative combinations, three Build Alternatives were recommended for evaluation and comparison to be considered as the Preferred Alternative for the Project.

Focused on solutions to interstate access at Sampson Street and distinguished by the type of bridge for crossing the EDC contamination area, these alternatives include improvements proposed for areas on the east and west sides of the study area as well as in the middle section (designated on **Figure ROD-2** below as Bridge Alternatives). Alternatives considered were developed to:

- Extend the length and number of acceleration, deceleration, and weaving lanes, and braid lanes and ramps so that drivers have more time to adjust their speeds and make appropriate lane changes;
- Provide auxiliary lanes to connect interchange ramps;
- Provide shoulders wide enough to allow vehicles to pull off the road for emergency stops;
- Flatten the vertical grades and horizontal curves so drive speeds can be steady;

- Reduce the number of potential conflicts between railroad and roadway traffic;
- Eliminate or raise the height of overhead obstructions including overpasses; and
- Improve lighting and roadway surfaces to make driving at night or in bad weather less risky.

The East End and West End Improvements are the same for all three of the Build Alternatives. Improvements common to all alternatives are:

- The mainline interstate will be reconstructed to provide six through lanes continuously from the I-10/I-210 interchange west end to I-10/I-210 interchange east end.
- The existing four-lane I-10 Calcasieu River Bridge will be replaced with a new bridge located slightly north. It will consist of six travel lanes.
- The bridge height will be lower than the existing bridge, reducing the vertical clearance from approximately 135 feet to 73 feet. The lower height will allow for a vertical grade that is less steep than the current five percent grade.
- Mainline I-10 on the west end will be extended east to allow I-10 to cross over the U.S. Highway 90 (US 90) bridge that currently overpasses the interstate. The US 90 bridge over I-10 will be demolished and replaced with an at-grade roadway on a similar alignment.
- As the mainline interstate approaches Westlake from the west, it will be realigned to shift I-10 to the north as it crosses Sampson Street and joins the new Calcasieu River Bridge.
- From the existing I-10 overpass at Ryan Street, the mainline will be elevated on a continuous bridge structure known as a viaduct or land bridge to Opelousas Street.
- Earthen embankments will be removed.
- On- and off-ramps will be relocated and reconfigured to better serve future traffic operations.
- Belden Street, which serves as the eastbound I-10 Service Road (southside), will be shifted south to accommodate ramps, intersection spacing, and control of access.

Ultimately, all three Build Alternatives would effectively address:

- a) System continuity on I-10 by providing three through lanes in each direction and reconstructing to eliminate posted advisory speeds at curves and on the I-10 Calcasieu River Bridge;
- b) Congestion and improved mobility on I-10 and Sampson Street by mitigating bottlenecks that cause spillbacks and reducing disruptions from at-grade railroad crossings;
- c) Structural and functional roadway and bridge deficiencies by reconstructing the system to meet current design guidelines and by replacing bridges and overpasses that are in poor condition.

The effect on (a) system continuity and (c) structural and functional deficiencies would be the same for all three Build Alternatives. The Interactive Highway Safety Design Model (IHSDM) was used to measure the ability of alternatives to meet safety related improvement goals. This model is a suite of software tools that support project level geometric design decisions by providing quantitative information on expected safety and operational performance. Safety analyses were performed for all alternatives in the EIS using the IHSDM. Those analyses did not indicate a statistically significant safety benefit that would meet the Purpose and Need for safety and independently justify the proposed Project. However, a comparative safety analysis indicates that the Preferred Alternative (5G) will meet current design standards for safety.

In addition, the Build Alternatives would not only address (b) traffic issues at Sampson Street by improving access to I-10 from Westlake but would also offer ways to avoid two at-grade railroad crossings that cause unpredictable delays and safety concerns.

All Build Alternatives shown on **Figure ROD-2** would not only have to provide a bridge on I-10 to cross the Calcasieu River but would also span or minimize the foundation footprint within a known area of contamination in Westlake. This contamination is the result of a release of Ethylene Dichloride (EDC). Bridge types considered include a standard span supported by long pilings, a bridge span long enough to cross the EDC with foundations at either end, a bridge span supported on a compensated foundation that would be less deep than long pilings, and a bridge span with a lower profile western approach supported on shorter pilings as it comes to grade across the EDC area. Several technical solutions were considered including construction of a retaining wall. Realignment of I-10 to the south to completely avoid the EDC area was also considered.

3.3. Screening

A screening process was used to compare the alternatives based on their ability to meet the Project's Purpose and Need, along with environmental considerations and cost and financial considerations. The screening process entailed development of an Alternatives Screening Methodology (ASM) to explain how the alternatives would be evaluated. Consisting of three

levels (Purpose and Need screening; Objectives screening; and Detailed Evaluation), the ASM was used to screen all early alternatives including those with non-structural concepts. Early alternatives that failed to meet the Project's Purpose and Need were eliminated from further consideration, as were Transportation Systems Management and Operations alternatives because they would not address structural or functional deficiencies. The remaining alternatives were then moved forward to Objectives screening where they were compared with an impact matrix. This matrix considered factors such as engineering, cost, environmental consequences, and public and agency input.

Each alternative was evaluated for both positive and negative effects based on a set of qualitative and quantitative objectives and thresholds. From this screening emerged three reasonable Build Alternatives (**Figure ROD-2**): Alternative 3A, Alternative 3E, and Alternative 5G, which were then evaluated and compared in detail in the DEIS.

Widening of I-10 to three lanes in each direction where currently only two lanes exist is proposed for all three Build Alternatives along with changes to vertical and horizontal alignments, shoulder widths, acceleration and deceleration lane lengths, and other geometric features that meet current design guidelines to the extent practicable. Reconstruction of overpasses to accommodate the additional interstate lanes and shoulder widths, replacement of embankments with bridge structures with sufficient vertical clearances, and control of access at Enterprise Boulevard are also proposed for all three Build Alternatives.

All the Build Alternatives would reduce the vertical clearance of the I-10 Calcasieu River Bridge from 135 feet to 73 feet. The No Build Alternative is the alternative that would meet the reasonable needs of current and prospective navigation on the waterway without additional mitigation. The No Build would include short-term maintenance activities such as bridge inspections and repairs, resurfacing, and signal improvements. However, the No Build would not meet the Purpose and Need for the Project.

These alternatives included improvements proposed for areas on the east and west sides of the study area as well as in the middle section designated as Bridge Alternatives (identified on **Figure ROD-2**). All Build Alternatives focused on solutions to interstate access at Sampson Street and were distinguished by the type of bridge proposed for crossing the EDC area. The East End and West End of the Project Corridor (**Figure ROD-1**) contain the same improvements for all Build Alternatives and are described in Section 2.3.5 of the DEIS.

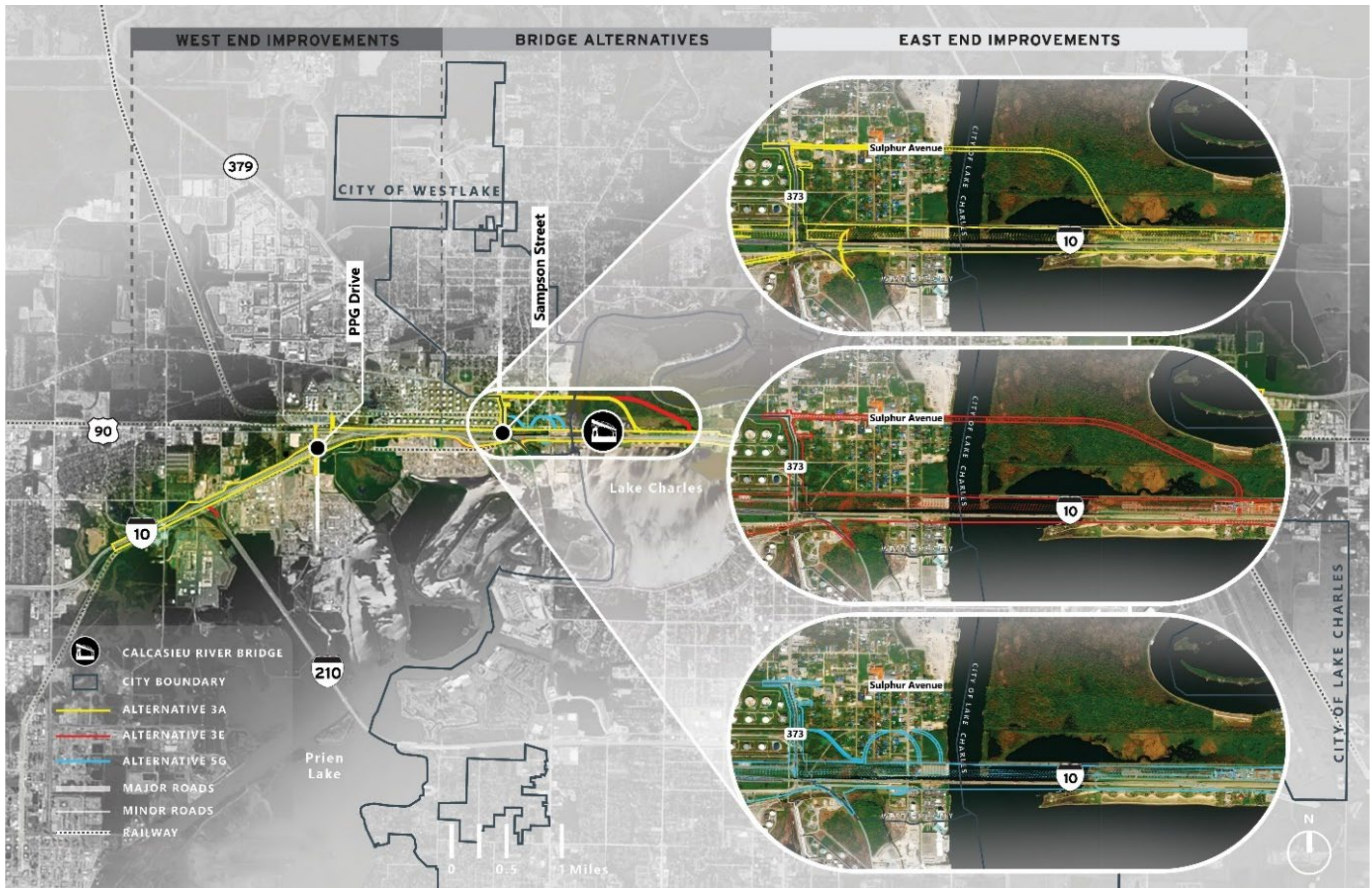


Figure ROD-2: Reasonable Build Alternatives

3.4. No Build Alternative

The No Build Alternative serves as the baseline to which the other alternatives are compared. The No Build Alternative would maintain the highway in its existing configuration; however, “no build” in the case of the Project is not equivalent to “no action.” Short-term activities such as bridge inspections and repairs, resurfacing, and signal improvements will continue to be implemented. The effect of these ongoing activities is considered in the comparison of the No Build Alternative with the other alternatives. The No Build Alternative is the alternative that would meet the reasonable needs of current and prospective navigation on the waterway without additional mitigation. The No Build Alternative was also included in the analysis in the recognition of the possibility that it might have been selected as the Preferred Alternative; however, the No Build Alternative would not solve any of the problems identified in the Purpose and Need.

3.5. Selected Alternative

The Louisiana Department of Transportation and Development (LADOTD), as the state agency, has proposed Alternative 5G as the Selected Alternative for the I-10 Calcasieu River Bridge Improvements Project. The DEIS and FEIS document the comparison of the three Build Alternatives as well as the No Build Alternative. A summary of this comparison is shown in **Table ROD-1**. Based on comparative analyses of the Build Alternatives and public/local agency input, Alternative 5G contains factors that support this decision to identify it as the Selected Alternative (**Figure ROD-3**). **The ROD Selected Alternative is the same as the FEIS Preferred Alternative.**

Table ROD-1: Comparative Analyses in Support of the FEIS Preferred Alternative/ROD Selected Alternative

Impacts	Alternative 3A	Alternative 3E	Preferred Alternative 5G
Habitat			
Bald Eagle's Nest	Within 650 Feet	Within the Limits of Construction	No Impact
Wetlands			
Numbers of Acres	~32.2	~37.7	~26.9
Visual Effects			
View by Lakefront Users	Roadway More Intrusive	Roadway More Intrusive	No Change
View of Westlake Gateway by Drivers	No Change	No Change	Elevated Above Industrial Clutter
Traffic Noise Impacted Receptors			
Park, Church, Institution, and Other (Category C)	18 (18)	16 (16)	14 (14)
Hotels, Restaurants, Other Development (Category E)	0	0	0
Total Number of Impacted Receivers (Receptors)	248 (256)	260 (287)	256 (283)
Land Use			
Westlake - Sulphur Ave (Sampson Street to the River)	Change in Land Use to Commercial	Change in Land Use to Commercial	No Change
Cost Estimates			
Construction (\$ Million 2021)	\$1,174	\$1,256	\$991

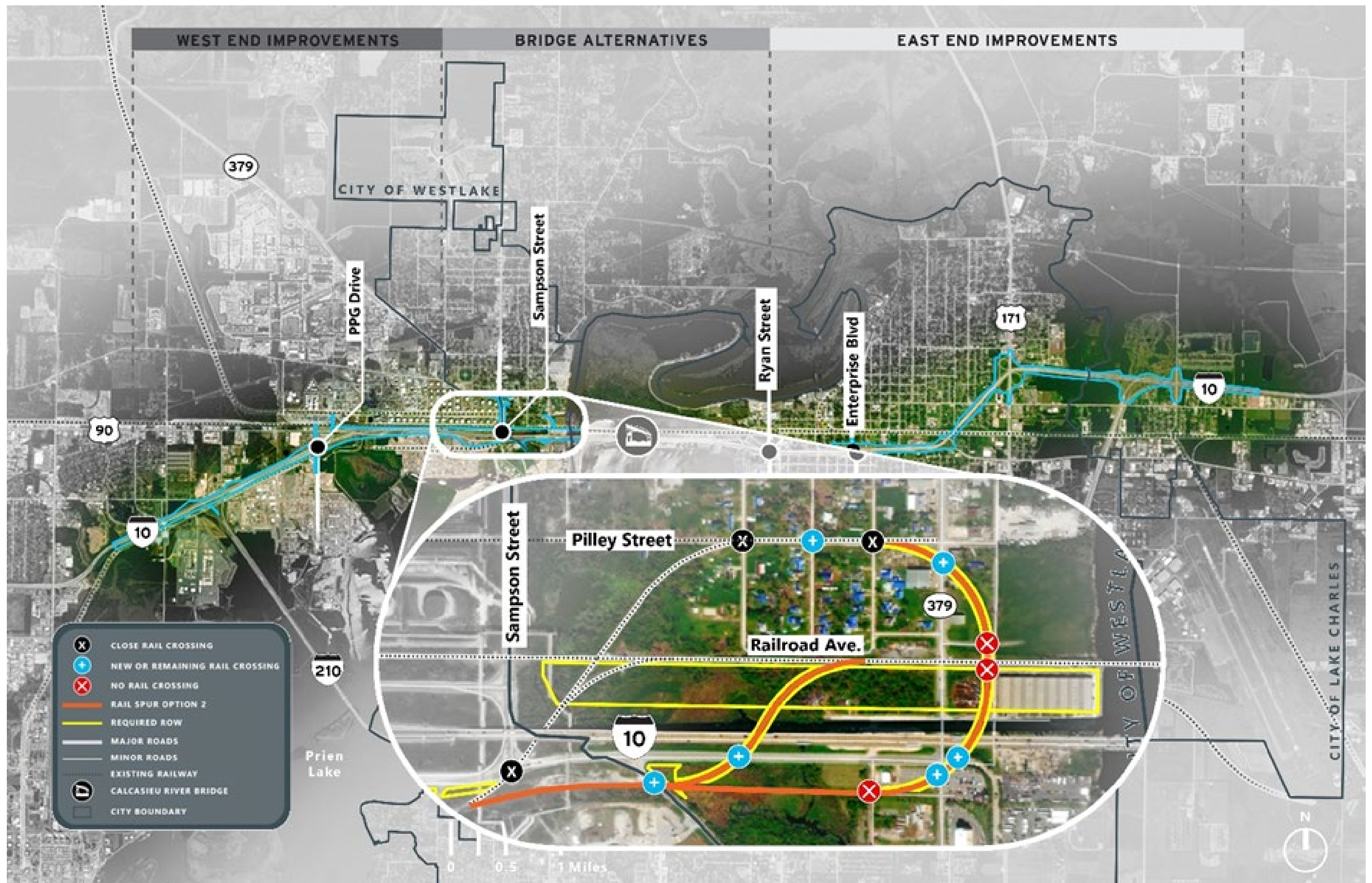


Figure ROD-3: Selected Alternative

Traffic operations would be improved by the Project compared to the No Build Alternative. Based on model outputs, traffic operations of the three Build Alternatives are very similar. A key issue that affects traffic operations but could not be captured by traffic modeling are disruptions from the at-grade railroad crossings on Sampson Street. Alternative 5G proposes to provide a grade separation at Sampson Street that would eliminate the at-grade crossings. This design would also eliminate the non-recurring congestion and unreliable travel times resulting from the at-grade railroad crossings and from the movable bridge proposed as part of Alternatives 3A and 3E. Alternative 5G would provide the most improved traffic operations of the three Build Alternatives that were evaluated.

Based on comparative analysis of the Build Alternatives and public/local agency input, Alternative 5G was recommended as the FEIS Preferred Alternative for the I-10 Calcasieu River Bridge Improvements Project. The factors that supported this recommendation were:

- Fewer wetland acres impacted
- No change to land use along Sulphur Avenue
- Opportunity to improve Westlake Gateway by reducing visual clutter
- Elimination of at-grade railroad crossings on Sampson Street reducing interruptions to traffic operations
- Fewest acres of ROW to be acquired
- Fewest impacted noise receptors
- Avoids introduction of new interchange near Ryan Street and visual intrusion on scenic views of the lake
- Preferred by the public and local officials
- Least cost to construct
- Does not propose a movable bridge that would cause disruptions to waterway and roadway traffic
- Fewer impacts to a known active bald eagle nest

Alternative 5G balances transportation needs with impacts to the natural and human environments and stakeholder input. Based on the need for a safe and efficient transportation corridor; the social, economic, and environmental effects of project alternatives; and national, state, and local environmental protection goals and funding, FHWA and LADOTD have identified Alternative 5G as the Selected Alternative for the Project. The analysis completed in this ROD is

based on an appropriate level of detail and provides a good understanding of how the Build Alternatives perform relative to each other and to the No Build Alternative. Analyses of traffic, engineering, cost, and environmental considerations indicate that Selected Alternative 5G would have substantial advantages over Alternative 3A and Alternative 3E. Documents considered in making this decision include the Project DEIS and FEIS, associated technical reports and supporting documents, and responses to comments received on the DEIS and the FEIS.

4. MEASURES TO MINIMIZE HARM

In addition to selecting Alternative 5G, measures to minimize adverse effects from the Project to the degree practicable have been determined. The below subsections summarize plans for mitigation of impacts.

4.1. Acquisition of Right of Way, Displacements and Relocation Assistance

Selected Alternative 5G avoids neighborhoods adjacent to the Project Corridor to the extent possible to minimize the number of displacements. Relocation impacts from the Project were assessed. The relocation assessment can be found in Section 3.4 of the DEIS. **Table 12** in that section summarizes the relocation assessment for displacements and acquisition of right of way.

LADOTD adopted the Acquisition of Property and Relocation Assistance policy and established a program to manage the acquisition and relocation process in accordance with the federal Uniform Relocation Assistance and Real Property Acquisition Policies Act (Uniform Act) (49 CFR part 24). Replacement housing of last resort will be provided if comparable replacement dwellings are not available within the monetary limits for owners or tenants, as specified in 49 CFR Sec. 24.401 or Sec. 24.402, as appropriate.

Louisiana has more generous compensation requirements than federal regulations and laws. Louisiana Constitution Article 1, §4 states the requirement for just compensation: "Property shall not be taken or damaged by the state . . . except for public purposes and with just compensation paid to the owner or into court for his benefit."

Also, for every expropriation or action to acquire property, the owner shall be compensated to the full extent of his loss pursuant to the provisions of Article 1, §4:

Except as otherwise provided in this Constitution, the full extent of law shall include, but not be limited to, the appraised value of the property and all costs of relocation, inconvenience, and any other damages actually incurred by the owner.

Forms and letters related to the relocation policy and process can be found [online](http://wwwsp.dotd.la.gov/Inside_LaDOTD/Divisions/Engineering/Real_Estate/Pages/Relocation.a_spx) at http://wwwsp.dotd.la.gov/Inside_LaDOTD/Divisions/Engineering/Real_Estate/Pages/Relocation.a_spx.

When comparable replacement housing is not available, a procedure known as Last Resort Housing will be used provide necessary housing in a number of ways such as:

- Making a replacement housing payment in excess of the maximum statutory limits;
- Purchasing an existing comparable residential dwelling and making it available in exchange for the dwelling;
- Moving and rehabilitating a dwelling and making it available in exchange for the property;
- Purchasing, rehabilitating or reconstructing an existing dwelling to make it comparable to the property;
- Purchasing land and constructing a new replacement dwelling comparable to the dwelling when comparable dwellings are not otherwise available;
- Purchasing an existing dwelling, removing barriers, or rehabilitating the structure to accommodate a handicapped displaced person when a suitable comparable replacement dwelling is not available; or
- Providing a direct loan which will enable the displaced person to construct or contract for the construction of a decent, safe, and sanitary replacement dwelling.

Displaced individuals and families will be relocated within the community with access to services they are accustomed to, if desired, and are entitled to moving costs and certain moving-related expenses. For a homeowner, a purchase supplement may be provided in addition to the acquisition price for the residence. For tenants, rental assistance may be provided. LADOTD's relocation assistance brochure states that

Owner-occupants and tenants of 90 days or more may be eligible for a rental assistance payment. To be eligible for a rental assistance payment, tenants and owners must have been in occupancy at least 90 days immediately preceding initiation of negotiations for the property. This payment is designed to enable you to rent a comparable decent, safe, and sanitary (DSS) replacement dwelling for a 42-month period. If you choose to rent a replacement dwelling and the cost of rent and utilities are higher than you were paying, you may be eligible for a rental assistance payment. The Agency will determine the maximum payment you may be eligible to receive in accordance with established procedures. The rental assistance payment is paid in a lump sum unless the Agency determines that the payment should be in installments. You must rent and occupy a DSS replacement dwelling within one year to be eligible.

4.2. Noise

A noise analysis was completed to assess traffic noise impacts and prepared in accordance with the FHWA noise standards, Procedures for Abatement of Highway Traffic and Construction Noise (23 CFR 772), and LADOTD's Highway Traffic Noise Policy, which was revised in 2021.

The FHWA Traffic Noise Model (TNM) Version 2.5 was used to predict traffic noise levels. The TNM model is used to obtain reasonable estimates of traffic noise at discrete locations by considering interactions between different noise sources and the effects of topographical features on altering predicted noise levels. In areas where there is a common noise environment (CNE), one modeled TNM receiver can be considered representative of many receptors. The Selected Alternative would slightly reduce the number of impacted receptors compared to the No Build Alternative, but a substantial number would continue to be impacted by traffic noise. Noise barriers were considered for all impacted receptors which are shown in Attachment 3 of Appendix K, the Noise Technical Report, of the DEIS, provided in the document library online at i10lakecharles.com/documentlibrary.

The TNM analysis indicated barriers would reduce noise for those impacted receptors adjacent to the roadway at three locations near Enterprise Boulevard, resulting in a slight reduction of cumulative traffic noise in the area. Information on the location, height, and estimated cost of the three likely noise barriers can be found in **Table 33** in Section 4.2.2 of the DEIS.

A final recommendation about the barriers will be determined during final design. If conditions change substantially during final design that would change the proposed implementation of likely barriers, LADOTD will solicit the viewpoints of those affected as part of the reevaluation of noise abatement reasonableness.

Temporary noise increases within the study area would be caused by construction activities. Primary noise generators would be from heavy equipment used in hauling materials and building the proposed roadway and structures. Sensitive areas located close to construction sites may temporarily experience increased sound levels. LADOTD has the responsibility for protection of the public in all aspects of construction throughout the duration of the Project. All construction equipment will be required to comply with Occupational Safety and Health Administration (OSHA) regulations as they apply to employees' safety and in accordance with LADOTD Standard Specifications. All construction equipment used during the construction phase should be properly muffled, and all motor panels should be closed during operation.

4.3. Environmental Justice

Social characteristics of the Project Area were considered to determine how the Project might benefit or adversely affect specific social groups. Potential effects on minority and low-income populations were evaluated in accordance with Executive Order 12898, Federal Actions to Address Environmental Justice (EJ) in Minority Populations and Low-Income Populations (February 11, 1994) and FHWA environmental justice regulations. Title VI of the Civil Rights Act of 1964 (Title VI), 42 USC. § 2000d et seq., and DOT Title VI regulations at 49 CFR Part 21, are

designed to provide equal opportunity and access in all programs receiving federal financial assistance from the US Department of Transportation (USDOT), by ensuring nondiscrimination on the basis of race, color, or national origin (including limited English proficiency).

As outlined in FHWA's Guidance on Environmental Justice and NEPA Environmental Review Toolkit, if there is a disproportionately high and adverse effect (DHAЕ) on an EJ population, after taking benefits and mitigation into account, the NEPA document must evaluate whether there is a further practicable mitigation measure or practicable alternative that would avoid or reduce the DHAЕs. FHWA will approve the proposed action only if it determines no such practicable measures exist.

If the affected population is a minority population protected under Title VI, FHWA will not approve the proposed action unless FHWA determines:

- 1) There is a substantial need for the project, based on the overall public interest; and
- 2) Alternatives that would have less adverse effects on protected populations have either:
 - a) Adverse social, economic, environmental, or human health impacts that are more severe; or
 - b) Would involve increased costs of an extraordinary magnitude.

FHWA has determined there is a substantial need for the Proposed Project based on overall public interest, as described in Section 1.4 Purpose and Need of the FEIS . For example, without the project the structural deficiencies that formed part of the need for the project would remain unaddressed and would present a hazard to the traveling public, including the EJ community . Additionally, without the project, congestion levels would worsen over time . Alternatives that would have fewer adverse effects on protected populations were considered, but these would involve increased costs of an extraordinary magnitude as shown in Table FEIS-1 of the FEIS . Selected Alternative 5G is \$183 million dollars less than Alternative 3A and \$265 million less than Alternative 3E. In response to the DHAЕ and to minimize other impacts to protected populations, mitigation measures such as noise walls, landscaping, advanced right of way acquisition, and local toll rate discounts, as shown in **Table ROD-2**, will be implemented.

The stated mission of LADOTD's Title VI Program is to ensure that no person be excluded from participation in, denied benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance on the grounds of race, color, national origin, age, gender, or disability.

The Project would relocate the I-10 Calcasieu River Bridge to a new alignment north of the existing bridge. This change would require relocation of residences and businesses in the Bridge Alternatives Section of the Project. Residents will be relocated within the community with access to services they are accustomed to, if desired. Realignment of Belden Street and the I-10 Service

Road North in Lake Charles would cause displacements in the East End Section. Both sections contain EJ communities.

Disproportionately high and adverse social and economic effects on minority populations and low-income populations were assessed comparing EJ communities and Non-EJ/Reference communities along the Project Corridor. Residential and business displacements, right of way acquisition, traffic noise, and impacts to significant trees were shown to be disproportionately high and adverse in the EJ communities compared to the Non-EJ/Reference communities. This analysis can be found in the Environmental Justice Technical Memorandum for the Project, Appendix E of the FEIS, which is located online on the Project Website's document library at i10lakecharles.com/documentlibrary.

Timely public outreach will be conducted to inform property owners of the LADOTD property acquisition and relocation process. For every expropriation or action to acquire property, the owner shall be compensated to the full extent of his loss pursuant to the provisions of Louisiana Constitution Article 1, §4: *Except as otherwise provided in this Constitution, the full extent of loss shall include, but not be limited to, the appraised value of the property and all costs of relocation.* As mitigation for the DHAEs from residential and business relocations and ROW acquisition, LADOTD will offer advanced or early acquisition to property owners. The replacement property will be equal to or better than the current property; all expenses related to relocation will be compensated.

LADOTD proposes to modify the cost effectiveness criterion of the LADOTD Highway Traffic Noise Policy for project-specific EJ mitigation; the cost per benefited receptor of \$47,000 will be doubled to \$94,000; thus, the number of reasonable and feasible noise walls will be increased by three per the traffic noise analysis conducted for the Project, provided in Appendix K of the DEIS and located online at i10lakecharles.com/documentlibrary. (Note this is not a change in the Noise Policy; it is additional mitigation to address EJ DHAEs from the Project.) This will provide a reduction in Traffic Noise for fifty first-row noise receptors and 223 non-first row benefitting noise receptors for a combined total of 273 benefitting noise receptors.

LADOTD will coordinate with EJ community residents as design progresses and in advance of impacts to significant trees. Impacted trees will be replaced with Context Sensitive Solutions and Design (CSS/D) elements where reasonable and feasible.

LADOTD undertook a supplemental targeted EJ outreach campaign to identify and communicate with members of EJ communities directly impacted by the Project. The measures proposed above were presented to EJ community members during the supplemental EJ outreach. An executive summary of this outreach effort is found in **Appendix A** of this ROD.

4.4. Bicycle and Pedestrian Facilities and Complete Streets

Many comments from stakeholders, local officials, and the public focused on incorporating bicycle and pedestrian facilities on the I-10 Calcasieu River Bridge. Responses to comments received on this issue noted that current Louisiana state law (LA Rev Stat § 32:263) prohibits

bicycle and pedestrian facilities along interstate highways. Responses further noted that a bicycle/pedestrian path on the new bridge would not be practical. The length and grade of bridge approaches would discourage use and would not be compliant with the Americans with Disabilities Act (ADA). Additionally, costs and responsibility for security, cleaning, and maintenance of bicycle/pedestrian paths would have to be undertaken by local governments in the area, as LADOTD policy precludes the agency from maintaining any new bicycle and pedestrian facilities. However, due to continued local interest in this issue, provision of an ADA-compliant bicycle and pedestrian connection between Westlake and Lake Charles will be considered during the design phase of the Project. Capital and operating costs and potential safety impacts will be considered.

LADOTD will negotiate agreements regarding design, construction, and maintenance of enhancement features with local governments and agencies including the City of Lake Charles, the City of Westlake, and the Calcasieu Parish Police Jury. Enhancement features (including landscaping) will be incorporated into the Project where appropriate. Bicycle and pedestrian access within the local street network in Lake Charles will also be incorporated into the Project where appropriate within the Project ROW in accordance and compliance with Louisiana's Complete Streets Policy and ADA requirements.

LADOTD has committed to set-aside funding that will be used in combination with funding from local authorities for bicycle and pedestrian facilities not already required through Complete Streets and ADA compliance. This set-aside funding would not apply to facilities on the I-10 Calcasieu River Bridge for reasons detailed above.

Several areas adjacent to the interstate in the East End Section have been considered within the CSS/D process and these improvements will be implemented according to LADOTD Complete Streets policy and ADA requirements within the Project ROW. The final decision on incorporating bicycle and pedestrian facilities will depend on local public authorities executing a joint use and maintenance agreement with LADOTD.

4.5. Traffic During Construction

Traffic will be detoured in accordance with the Transportation Management Plan (TMP) developed for the work. Where appropriate, temporary improvements to facilitate traffic maintenance along the detour routes will be identified in the TMP and implemented prior to the associated closures. All closures will be evaluated through the TMP process and appropriate detours and/or associated mitigation will be established in the TMP. Signage for street closures that cause detours will be provided, and communications regarding road closures and construction-related delays will be disseminated by the MyDOTD Alert System. Sampson Street will be closed to traffic for a period of approximately 18 months when the Project is constructed. Pipe rack relocation will require temporary closure of the I-10 WB/Sampson Street ramps but will be completed as part of an early works package prior to construction of the Project. Closures relative to pipe rack relocation will last approximately six months and will be in addition to the approximately 18-month Sampson Street closure. Closures of other roadways in the vicinity of the pipe racks will be limited to nights and weekends to the extent practicable.

4.6. Air Quality

In response to the Clean Air Act (CAA) of 1970, United States Environmental Protection Agency (US EPA) established ambient air quality standards for six pollutants (designated criteria pollutants) that were considered as having a significant effect on public health and welfare. The original National Ambient Air Quality Standards (NAAQS) were set in 1971 for carbon monoxide, lead, nitrogen dioxide, ozone, particulate matter, and sulfur dioxide. The State of Louisiana adopted the NAAQS in 2008. Congress directed that these standards should be reviewed at least every five years by US EPA to keep up with current science, and that proposals to revise them should be based solely on public health and welfare considerations, not economic impacts. US EPA has determined that Calcasieu Parish is in attainment of all NAAQS (US EPA Green Book at <http://www3.epa.gov/airquality/greenbook/>). This means that these are areas with concentrations of criteria pollutants are below the levels established by the NAAQS.

The US EPA regulates mobile source air toxics (MSATs). MSATs are compounds emitted from highway vehicles and non-road equipment. The Project is identified as one with high potential MSAT effects; therefore, a quantitative MSAT analysis was performed for the Preferred Alternative and the No-Build Alternative following FHWA guidance. Updated guidance was issued in January 2023. The quantitative MSAT analysis included in the Air Quality Technical Report was conducted based on the latest MSAT guidance available at the time (October 18, 2016). The latest version of MOVES available at that time (MOVES3.0) was used for the analysis. However, MOVES background information and FHWA projected national emission trends were not available for MOVES3.0 from FHWA. Therefore, then-current prototype language which referenced MOVES2014b was used.

A slight increase in MSATs is anticipated from the Project due to projected increases in Vehicle Miles Traveled (VMT). However, despite the MSATs increase, regional levels are expected to decrease in the future due to fleet turnover and implementation of emission and fuel quality regulations. MSAT Health Impacts Analysis is included under the MSAT Background Information in Appendix J of the DEIS.

4.7. Water Resources and Water Quality

Field work for the Project was performed in February 2020 for the purpose of documenting wetlands and other water resources within the Project Area. References used to identify streams and other potential jurisdictional waters of the U.S. included U.S. Geological Survey (USGS) topographic maps, National Hydrography Dataset (NHD), and U.S. Fish and Wildlife Service (USFWS) National Wetlands Inventory (NWI) data. The Wetland Delineation Report is provided in Appendix L of the DEIS.

During development of the practicable alternatives, LADOTD took all necessary steps to avoid and minimize impacts to wetlands. Unavoidable impacts from Selected Alternative 5G will be mitigated by replacement of lost functions and values through restoration of formerly lost wetlands or by purchasing credits from an approved mitigation bank before the proposed action can be permitted by the United States Army Corps of Engineers (USACE). The preferred

form of compensatory mitigation is to purchase mitigation credits from an approved mitigation bank. A search of the USACE online Regulatory In-lieu Fee and Bank Information Tracking System (RIBITS) identified multiple mitigation banks which could be used to mitigate wetland impacts associated with the Project.

Erosion and siltation control measures will be installed around construction areas that require land-based earthwork (i.e., excavation and/or deposition of fill materials, land contouring, machinery rutting, fill maneuvering and redistribution, etc.) to ensure that no Project-related sediments, debris, and other pollutants enter adjacent wetlands or waters. Proper use and positioning of silt fences, straw bales, fiber/core logs, wooden barriers, seeding or sodding of exposed soils, or other approved US EPA construction site stormwater runoff control and best practices will be utilized. Control techniques shall be installed prior to commencement of earthwork activities and maintained until the Project is complete and/or the subject areas are stabilized.

Upon completion of construction activities, or if at any time construction activities cease for more than 14 days, all disturbed soils shall be re-vegetated by sod, seed, or another acceptable method, as necessary, to restore cover and prevent erosion.

4.8. Floodplain

The Project Corridor is comprised of two types of Special Flood Hazard Areas (SFHA): the SFHA with a 0.2 percent chance of flooding, also known as the 500-year floodplain (Zone X) and the SFHA with a one percent annual chance of flooding, also known as the 100-year floodplain (Zone A) as noted in the effective Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) for the Project Area dated February 18, 2011. The current I-10 alignment has portions that are longitudinal encroachments on the floodplain. The Project would continue to operate on this longitudinal encroachment. Attempting avoidance is not practicable for these locations.

The location hydraulic studies conducted for the Project determined that the proposed Project would not constitute a significant encroachment on the base floodplain for the following reasons:

- 1) The proposed Project does not represent a significant potential for interruption of I-10 for use by emergency vehicles or as an evacuation route. Historical data since the construction of I-10 within the Project Corridor indicates there is no significant potential for interruption of I-10, which has been in existence since the 1960s and has never been inundated by floodwaters. I-10 does serve as an east/west evacuation route; however, it is not the community's only evacuation route. During hurricane events, residents are encouraged to evacuate north. US 171 is the northern evacuation route in the City of Lake Charles and Hwy 378 (to US 171) is the northern evacuation route in the City of Westlake.

- 2) Risk is defined in 23 CFR §650.105(o) to mean the consequences associated with the probability of flooding attributable to an encroachment. It shall include the potential for property loss and hazard to life during the service life of the highway. FHWA recognizes the FEMA National Flood Insurance Program (NFIP) design standards that permit up to a one (1.0)-foot rise in water surface elevation for the 100-year flood (1% annual chance of flooding). Therefore, development in this floodplain (including highways) is permitted and does not pose a significant risk provided it does not cause backwater in excess of one (1.0) foot. This standard is established as the Federal standard under 23 CFR 650.115, Design Standards, and is to be used in designing highways in NFIP mapped floodplains. Furthermore, it is LADOTD's policy to not allow any backwater increase for sites covered by the NFIP and for delineated floodplains established under the NFIP.
- 3) The proposed Project would not cause a significant impact on natural and floodplain values but would remove some existing development out of the base floodplain and allow for a transition of that part of the floodplain to a more natural state.

LADOTD will coordinate with FHWA prior to final design to incorporate the best measures to minimize impacts on the floodplain and ensure that no increase in flood level due to construction occurs. The measures to be implemented will ensure that longitudinal encroachments from the Project would not cause a significant potential for interruption or termination of any part of I-10 or its associated highways needed for emergency vehicles or that provide evacuation routes. These measures will also ensure that no consequences will be associated with the probability of flooding attributable to the encroachment during the service life of I-10 and associated highways. Adverse effects on natural and beneficial floodplain values will be avoided. Therefore, the longitudinal encroachments from the Project do not constitute a significant encroachment or risk per 23 CFR 650, Subpart A.

4.9. Wildlife and Habitat

Species observed during the February 2020 field visit included a pair of nesting bald eagles, American white pelicans, belted kingfisher, downy woodpecker, northern flicker, northern cardinal, little brown skink, red-eared slider, gray squirrels, nine-banded armadillos, and feral hogs. Feral hogs are considered nuisance wildlife by the Louisiana Department of Wildlife and Fisheries (LDWF). The Wildlife and Habitat Report is provided in Appendix L of the DEIS. Risks to wildlife and their habitats from the Project were assessed as low, but mitigation measures will ensure that species and their habitats are and will be protected.

Coordination with USFWS in 2021 concluded with an effect determination from USFWS agreeing to the following:

- Threatened West Indian manatee – Not Likely to Adversely Affect
- Endangered Red-cockaded woodpecker – No Effect

A copy of the USFWS letter is provided in Appendix G.6 of the DEIS.

To mitigate potential impacts to the West Indian manatee, the following mitigation measures will be implemented during construction of a bridge spanning the Calcasieu River:

- All work, equipment and vessel operation should cease if a manatee is spotted within a 50-foot radius (buffer zone) of the active work area. Once the manatee has left the buffer zone on its own accord, or after 30 minutes have passed without additional manatee sightings within the buffer zone, in-water work can resume under careful observation for manatees.
- If a manatee is sighted in or near the Project Area, all vessels associated with the Project should operate at "no wake/idle" speeds within the construction area and at all times while in waters where the draft of the vessel provides less than a four-foot clearance from the bottom. Vessels should follow routes of deep water whenever possible.
- If used, siltation or turbidity barriers should be properly secured, made of material in which manatees cannot become entangled, and be monitored to avoid manatee entrapment or impeding their movement.
- Temporary signs concerning manatees should be posted prior to and during all in-water project activities and removed upon completion. Each vessel involved in construction activities should display at the vessel control station or in a prominent location, visible to all employees operating the vessel, a temporary sign at least 8½" X 11" reading language similar to the following: "CAUTION BOATERS: MANATEE AREA/IDLE SPEED IS REQUIRED IN CONSTRUCTION AREA AND WHERE THERE IS LESS THAN FOUR FOOT BOTTOM CLEARANCE WHEN MANATEE IS PRESENT". A second temporary sign measuring 8½" X 11" should be posted at a location prominently visible to all personnel engaged in water-related activities and should read language similar to the following: "CAUTION: MANATEE AREA/EQUIPMENT MUST BE SHUTDOWN IMMEDIATELY IF A MANATEE COMES WITHIN 50 FEET OF OPERATION".
- Collisions with, injury to, or sightings of manatees should be immediately reported to the USFWS Louisiana Ecological Services Field Office (337/291-3100) and the LDWF, Wildlife Diversity Program (504/286-4052 or 1-800-442-2511). Please provide the nature of the call (i.e., report of an incident, manatee sighting, etc.); time of incident/sighting; and the approximate location, including the latitude and longitude coordinates, if possible.

To mitigate impacts to migratory birds, existing bridges will be inspected for active nests prior to any construction/demolition. If active nests are observed on the bridge, bridge construction and demolition activities will be stopped until the nests are inactive. If the survey is done in advance of nesting season, steps should be taken to discourage the birds from returning prior to nesting season. Tree clearing, if any, will be performed outside the nesting season unless the agencies determine that a migratory bird nesting survey is required. Selected Alternative 5G would not affect a known active bald eagle nest in Lake Charles.

Water bottoms and associated marshes in and adjacent to the Calcasieu River and Lake Charles have been identified as Essential Fish Habitat (EFH) for various life stages of federally managed fishery species including post-larval and juvenile life stages of red drum and white shrimp. The primary categories of EFH affected by Project implementation include estuarine water column, estuarine water bottoms, and estuarine emergent wetlands. The National Oceanic and Atmospheric Administration (NOAA) restated its position that, given the identification of 5G as the Selected Alternative, the Project would not have a substantial impact on EFH or federally managed fishery species. A copy of NOAA's communication is provided in Appendix B of the FEIS.

During construction of the Project, improvements will be made to the natural drainage under the bridge to better convey water through the right of way in accordance with drainage design guidelines. Currently this ditch/canal is shallow from sediment runoff and full of Giant Cutgrass and Giant Salvinia. Best management practices (BMPs) will be used during construction to avoid the spread of any nuisance aquatic plant or animal species.

4.10. Section 106

Federal laws have been enacted to protect cultural, recreational, and other special national resources. Section 106 of the National Historic Preservation Act (NHPA) requires that federal undertakings consider the potential effects of their proposed projects on historic properties that include archaeological, architectural or buildings, structures, districts, sites, and objects. The US 90 Bridge over I-10, the existing I-10 Calcasieu River Bridge, and the Norris Point Archaeological Site are the three Section 106 Resources impacted by the Project. Mitigation for these impacts has been established in coordination with the Louisiana State Historic Preservation Office (LASHPO) and Section 106 consulting parties.

The Section 106 Programmatic Agreement relating to historic bridges in Louisiana that was executed between the FHWA, the LADOTD, and the LASHPO, along with the Advisory Council on Historic Preservation (ACHP), allows replacement of historic bridges if the steps outlined in the programmatic agreement are completed.

The I-10 Calcasieu River Bridge would be replaced. Eligible for listing on the National Register of Historic Places (NRHP), the I-10 Calcasieu River Bridge is a non-priority historic bridge covered by the Programmatic Agreement. Since sufficient documentation regarding non-priority bridges has been generated as part of the Historic Bridge Inventory effort and broad stewardship and programmatic mitigation efforts will be completed as part of the agreement, no additional mitigation for the I-10 Calcasieu River Bridge will be required.

The US 90 Bridge over I-10 is eligible for listing on the NRHP and would also be replaced. It is classified as a preservation candidate bridge. For preservation candidate historic bridges, the Programmatic Agreement outlines procedures to analyze alternatives to bridge replacement. LASHPO reviewed the Alternatives Analysis form prepared by LADOTD and, on August 20, 2021, issued a letter of no objection to the determination to replace the US 90 Bridge over I-10. A copy of the LASHPO letter is provided in Appendix E.2 of the DEIS.

Archaeological surveys were conducted for the Norris Point Archaeological Site (Site ID 16CU128). Section 106 Consulting Parties and tribal representatives were consulted regarding the site, and it was determined that a Phase III data recovery would be conducted. LADOTD, in conjunction with FHWA and LASHPO, executed the final memorandum of agreement (MOA) located in Appendix C of the FEIS which details recommended mitigation for the archaeological site and other stipulations regarding cultural resources.

4.11. Section 4(f)

Section 4(f) of the USDOT Act of 1966 established a national policy for the USDOT to avoid the use of significant public parks, recreation areas, wildlife and waterfowl refuges, and historic sites as part of a project unless there is no feasible and prudent alternative to the use of such land and the program includes all possible planning to minimize harm to any park, recreational area, wildlife and waterfowl refuge, or historic site resulting from such use.

Section 4(f) does not apply to the Norris Point Archaeological Site. Archeological sites that are on or eligible for the National Register when:

- (1) The Administration concludes that the archeological resource is important chiefly because of what can be learned by data recovery and has minimal value for preservation in place. This exception applies both to situations where data recovery is undertaken and where the Administration decides, with agreement of the official(s) with jurisdiction, not to recover the resource; and
- (2) The official(s) with jurisdiction over the Section 4(f) resource have been consulted and have not objected to the Administration finding in paragraph (b)(1) of this section. 23 C.F.R. § 774.13

The Administration concluded that the site is important chiefly because of what can be learned by data recovery, and it has minimal value for preservation in place. Data recovery has been selected as mitigation for the adverse effect from the Project.

The LASHPO is the official with jurisdiction over the Norris Point archeological site. As evidenced by their execution of the Section 106 MOA, they have not objected to the Administration finding.

Two historic bridges will be removed and replaced by the Project. As described in 4.10 above, Programmatic Section 4(f) Evaluation for each of the two bridges was prepared. Statements regarding their use, as defined in Section 4(f) of the Transportation Act, are provided in Appendix C of the FEIS.

4.12. Navigation

Navigation impacts to the Calcasieu River result from a reduction in the vertical clearance of the I-10 Calcasieu River Bridge. This impact would reduce the scale and types of navigation-dependent activities conducted north of the bridge. The US Coast Guard (USCG) provided

comments on the DEIS in a letter dated January 12, 2023, stating that the USCG cannot approve the reduced clearance because it will not allow companies involved in navigation the ability to use the Calcasieu River. In that letter, the USCG also stated that they could accept the reduction in vertical clearance if the companies were to accept LADOTD compensation.

Three organizations, Grey Rock Resources, Friend Ships, and Louisiana Scrap Metal would be affected by the reduction in vertical clearance, and LADOTD has received their claims for compensation. DOTD and FHWA are reasonably assured that agreement with impacted entities will be reached prior to submitting the final bridge permit application.

In an email dated January 9, 2024 and provided in **Appendix B**, the USCG stated that they would need an alternative that would meet the needs of current and prospective navigation on the waterway in the event that efforts to mitigate impacts are not met. At a meeting held January 10, 2024, LADOTD provided information about the status of the proposed mitigation plan and identified the No Build Alternative as the alternative that would meet the reasonable needs of navigation without additional mitigation. The USCG agreed that their FEIS review comments were satisfied. Evidence of completion of the mitigation to the satisfaction of impacted organizations will be provided by LADOTD to the USCG before the Bridge Permit is issued.

4.13. Rail Spur Relocations

The design for relocation of two railroad spur tracks in Westlake needed to build Alternative 5G is still being addressed through railroad coordination. Railroad Option 2 was selected as the most acceptable solution for the railroads and the City of Westlake (see **Figure ROD-2**) with the fewest impacts to residential and riverfront properties. Mitigation for closure of railroad crossings of two streets in this neighborhood will be determined based on input from impacted residents and businesses and in coordination with the railroads. Examples of possible mitigation include but are not limited to improvements to existing crossing, signage, signals, and gates (see **Figure ROD-3**).

4.14. Hazardous Waste

The presence of EDC and other known and unknown toxic hazardous substances complicates design, construction, maintenance of traffic signs and signals, and future maintenance of the western approach to the I-10 Calcasieu River Bridge and Sampson Street. Uncertainties about the effect of the Project on workers during construction and migration of the EDC must be accounted for in project funding.

To address concerns about downward migration towards the Chicot Aquifer, a sole-source aquifer for drinking water in the region, groundwater monitoring has been conducted in the vicinity of EDC and related contaminant releases (by responsible parties); ground and groundwater disturbances from construction activities will be minimized; soil and groundwater sampling during ground disturbing activities will be conducted as appropriate to monitor the migration of contamination.

Air monitoring to detect harmful volatile organic compounds (VOCs) will be conducted during ground disturbing activities in areas where evidence of existing contamination has been found. A Safety and Protection Plan and worker training for ground disturbing activities will be prepared; Personnel Protective Equipment (PPE) will be provided; further evaluation for ROW/property acquisitions to determine any other hazardous material issues will be considered.

4.15. Pending Commitments, Permits and Approvals

Permits, approvals, and other federal actions and commitments are required for the Project. Section 401 of the Clean Water Act (CWA) requires water quality certification from Louisiana Department of Environmental Quality (LDEQ) for waters of the US that will be part of the Section 404 permitting process through USACE for impacts to wetlands and other waters. Section 10 of the Rivers and Harbors Act is a required authorization from the USACE for impacts to navigable waterways. A USCG Bridge Permit will also be required.

A Louisiana Pollution Discharge Elimination System (LPDES) stormwater permit is required and will be administered by LDEQ for surface water discharges in the State of Louisiana. A Stormwater Pollution Prevention Plan (SWPPP), a written document that outlines the measures to be taken to prevent discharges to surface waters during construction, is a requirement of the LPDES stormwater permit.

Consultation is pending with the USACE for Section 408 review because the Project falls within the buffer zone of the Calcasieu Ship Channel, a civil works project. Section 408 coordination for the Project will be initiated during the Section 404 permitting process.

In accordance with the Section 106 MOA executed November 15, 2022 with the LASHPO and other Section 106 consulting parties, data recovery will be undertaken as part of the mitigation for adverse effects to the Norris Point Archaeological Site. This work must be completed prior to commencement of construction activities within the limits of the Norris Point Archaeological Site.

The USCG has stated in a letter included in Appendix B of the FEIS, Letters from Agencies with Comments on the DEIS, that they could accept a reduction to 73 feet of vertical clearance of the I-10 Calcasieu River Bridge if lost revenue and/or vessel berths for the organizations affected is compensated. Development of the terms of this compensation and coordination with these organizations is ongoing but will be completed prior to issuance of a USCG bridge permit.

The Project requires relocation of two existing rail spurs. The preferred Rail Spur Relocation Option 2 is shown on **Figure ROD-3**. LADOTD and FHWA will continue coordination with members of the public and railroad operators to ensure that Rail Spur Relocation Option 2 will provide optimal benefit to all those impacted.

As stated in Section 2.4.7 of Appendix E of the FEIS, LADOTD commits to developing a Private-Public Partnership (P3) Project-Specific Disadvantaged Business Enterprise (DBE) Outreach and Participation Plan that will at a minimum:

- Establish the approach and methodology to be followed for DBE participation, including
 - Female Participation Goal of 6.9 percent
 - Overall DBE Goal of 10.34 percent
 - Minority Participation Goal of 19.3 percent
- Include a mechanism to ensure the goals above are reached.
- Include mechanisms to ensure DBE utilization, including monitoring, reporting, corrective actions, and adaptive management
- Include strategies to develop subcontract work packages targeted to DBE contractors through scope of work right-sizing and specific advertisement to DBE contractors
- Include details on participation in the USDOL OFCCP Mega Construction Project Program, which
 - Promotes compliance with non-discrimination and affirmative action obligations
 - Offers contractors and subcontractors compliance assistance and conducts compliance evaluations

LADOTD commits to developing a P3 Project-Specific Workforce Development Plan that will at a minimum:

- Establish controls to ensure all laws, policies, and contract requirements are met and documented, including
 - Form FHWA-1273 'Required Contract Provisions Federal-Aid Construction Contracts'
 - Executive Orders 11246 and 11375
 - Davis-Bacon Wages for Heavy (LA20230002 04/14/2023) and Highway (LA 20230013 01/06/2023) construction types
- Affirm the commitment to maximize opportunities for socially and economically disadvantaged individuals in the Project vicinity, particularly in surrounding underserved communities
- Provide for workforce recruitment efforts, including outreach events to the local community
- Raise awareness of the workforce development program by working with schools, community organizations, and workforce development organizations
- Provide for training and assistance to prospective and actual local employees to alleviate barriers to employment and promote retention
- Provide DOTD funding availability for voluntary contractor participation in on-the-job training

Note: Actual plans have yet to be developed; the exact mechanisms by which these commitments will be achieved cannot be specified at this time. These commitments are specific to Phase 1 of the Project and will be implemented through the P3. It should also be noted that the majority of business impacts related to the overall Project exist in Phase 1; therefore, the

potential adverse impact to existing employment and/or existing employment opportunities also exists in that phase of work.

5. PROJECT COMMITMENTS

Permits, approvals, and other federal actions and commitments are required for the Project. As required by NEPA, FHWA and LADOTD identified measures to avoid, minimize, and mitigate adverse effects and impacts from the Project to the degree practicable have been determined. These measures are generally referred to as mitigation. Mitigation and commitments listed in the FEIS are listed in **Table ROD-2**.

Table ROD-1: Permits, Mitigation, and Commitments

ITEM/RESOURCE	AGENCY/AUTHORITY	MITIGATION/COMMITMENT
General Permit/Storm Water Discharges from Construction Activities	LDEQ/LPDES	Preparation of a SWPPP that will outline specific BMPs to mitigate stormwater runoff impact to water quality during construction.
Commitment/Community Outreach to EJ Communities	LADOTD	LADOTD will conduct targeted community outreach to EJ Communities along the Project corridor, contacting businesses, residents, and property owners directly affected by the Project to solicit input and consider their needs regarding impacts and mitigation of disproportionately high and adverse effects from right-of-way acquisition, displacements, traffic noise, aesthetics, landscaping, and Context Sensitive Solutions and Design elements. In addition to prescribed measures, mitigation such as advanced acquisition and relocation services as well as consideration of maintaining proximity to services and family will be offered. This task was completed.
Mitigation/EJ – Traffic Noise Abatement Measures	LADOTD	<p>LADOTD proposes to modify the cost effectiveness criterion of the LADOTD Highway Traffic Noise Policy for project-specific EJ mitigation; the cost per benefited receptor of \$47,000 will be doubled to \$94,000; thus, increasing the number of reasonable and feasible noise walls by three (3) per the traffic noise analysis conducted for the Project, provided in Appendix K of the DEIS and located online at i10lakecharles.com/documentlibrary.</p> <p>LADOTD will present this mitigation to members of EJ communities directly impacted by the Project. See Figures CNE J, CNE K, and CNE O for barrier locations. All locations of potential noise barriers will be presented as mitigation during public outreach to affected parties. This task was completed.</p>
Compliance/Floodplain Encroachment	LADOTD/FHWA, FEMA, and State and Local Floodplain Managers/23 CFR 650, Subpart A	LADOTD will coordinate with FHWA prior to final design to determine any water surface elevation impacts of placing fill within the floodplain and final design plans will incorporate measures to avoid or minimize impacts on the floodplain
Commitment/Temporary Noise and Vibration impacts	LADOTD/Policies and Procedures	Use of heavy machinery and pile driving limited to daylight hours; proper maintenance and operation (including special muffling) of noise-generating equipment; make available Vibration Complaint Form; early installation of reasonable and feasible noise barriers; consideration of alternative methods for pile driving such as vibration or hydraulic insertion techniques and drilled or augured holes for cast-in-place piles.

ITEM/RESOURCE	AGENCY/AUTHORITY	MITIGATION/COMMITMENT
Commitment/Temporary Air Emissions	LDEQ and LADOTD/Policies and Procedures	Fugitive dust control measures; comply with CAA emission standards and requirements for heavy and off-road equipment. BMPs to reduce air emissions and suppress dust.
Commitment/Maintenance of Traffic	LADOTD/Policies and Procedures	At least one lane of traffic in each direction on I-10 will be maintained at all times; provide signage for street closures that cause detours; communications re: road closure and construction related delays via MyDOTD alert system.
Due Diligence/Hazardous Waste Sites and Risks to Human Health and the Environment	LDEQ and US EPA/ Resource Conservation and Recovery Act, Comprehensive Environmental Response Compensation and Liability Act, and LAC Title 33, V. Subpart 1.	Groundwater monitoring in vicinity of EDC and related contaminant releases (by responsible parties); minimization of ground and groundwater disturbances from construction activities including minimizing foundation footprint within the EDC plume; soil and groundwater sampling during ground disturbing activities as appropriate; Air monitoring to detect harmful volatile organic compounds (VOCs) will be conducted during ground disturbing activities in areas where evidence of existing contamination has been found. Preparation of Safety and Protection Plan and worker training for ground disturbing activities; provide Personnel Protective Equipment (PPE); further evaluation for ROW / property acquisitions as needed.
Commitment/Tolling	LADOTD/Commitment	A local toll rate could be as low as \$0.25 cents but will be no more than \$2.88 in 2021 dollars per one-way trip through purchase of a transponder to be distributed at a minimum of two outlets within one low-income community in Westlake and one low-income community adjacent to I-10 in Lake Charles.
Commitment/Bicycle and Pedestrian Facilities	LADOTD/Complete Streets Policy and ADA Requirements	\$10 million in funding has been set aside for bicycle and pedestrian facilities not already required through Complete Streets and ADA Compliance and a requirement for coordination with local Metropolitan Planning Organization (MPO) to design and construct them.
Commitment/Rail Spur Relocation	Federal Railroad Administration (FRA)	LADOTD and FHWA will continue coordination with members of the public and railroad operators to ensure that rail spur relocation option 2 will provide optimal benefit to all impacted.
Commitment/USGS Streamgage and well	LADOTD/Commitment	The USGS Lower Mississippi-Gulf Water Science Center will be contacted and given sufficient advance notice before construction begins near USGS Site number 807044, Calcasieu River Bridge at I-10 at Lake Charles, LA, USGS streamgage to note the gap in accurate data during construction and prior to relocation of the streamgage. Efforts will be made to preserve USGS Site number 301435093154601, USGS Site Cu-1021 well.
Commitment/Environmental Justice (EJ) – Significant trees	LADOTD	LADOTD will coordinate with EJ community residents as design progresses and in advance of impacts to significant trees. Impacted trees will be replaced with Context Sensitive Solutions and Design (CSS/D) elements where reasonable and feasible.

ITEM/RESOURCE	AGENCY/AUTHORITY	MITIGATION/COMMITMENT
Commitment/Environmental Justice (EJ) - Displacements and Right of Way Acquisition	LADOTD	As mitigation for the DHAEs from right of way acquisition, LADOTD will offer advanced or early acquisition to property owners. When advanced acquisition is offered to property owners, LADOTD will also offer relocation benefits prior to actual acquisition. Section 2.8 of the LADOTD Real Estate Operations Manual (2018) and the LPA Right of Way Manual (2017) describe the process and authorizations for early or advanced acquisition of property for right of way. Displaced residents will be relocated within the community with access to services they are accustomed to, if desired.
Compliance/Navigable Airspace	Federal Aviation Authority (FAA)/14 CFR Part 77	Submit a Notice of Proposed Construction or Alteration (FAA Form 7460-1)
Permit/Waters of the US including Wetlands	US Army Corps of Engineers/Section 404 of the Clean Water Act	Compensatory mitigation for unavoidable impacts to wetlands through the purchase of credits from an approved mitigation bank.
Permit/Navigable Waterways	USACE/Section 10 of the Rivers and Harbors Act	Review of obstructions to navigable waterways from proposed bridge replacement
Certification/Water Quality	LDEQ/Section 401 of the Clean Water Act and LAC IX Chapter 15	Certifies discharges into waters of the US do not impair water quality
Permit/Bridges and Obstructions to Navigation	USCG/33 USC 401, 491, 525-533, the International Bridge Act, and Section 10 of the Rivers and Harbors Act	Navigation interests impacted by the reduction in the vertical clearance of the I-10 Calcasieu River Bridge will be compensated for financial losses or loss of adequate berths. Evidence of completion of the mitigation to the satisfaction of impacted organizations will be provided to the USCG before the Bridge Permit can be issued.
Permission/Modifications to Federal Civil Works Projects	USACE/33 USC 408 (Section 408)	Review impacts to Calcasieu Ship Channel

ITEM/RESOURCE	AGENCY/AUTHORITY	MITIGATION/COMMITMENT
Compliance/Relocation and Right of Way Acquisition	FHWA and LADOTD/24 CFR 983.7	<p>Compensation for property taken and compensation/assistance for displacements</p> <p>For every expropriation or action to acquire property, the owner shall be compensated to the full extent of his loss pursuant to the provisions of Louisiana Constitution Article 1, §4: Except as otherwise provided in this Constitution, the full extent of law shall include, but not be limited to, the appraised value of the property and all costs of relocation, inconvenience, and any other damages actually incurred by the owner.</p> <p>Forms and letters related to the relocation policy and process can be found online at http://wwwsp.dotd.la.gov/Inside_LaDOTD/Divisions/Engineering/Real_Estate/Pages/Relocation.aspx</p> <p>When comparable replacement housing is not available, a procedure known as Last Resort Housing will be used provide necessary housing in a number of ways such as:</p> <ul style="list-style-type: none"> • Making a replacement housing payment in excess of the maximum statutory limits; • Purchasing an existing comparable residential dwelling and making it available in exchange for the dwelling; • Moving and rehabilitating a dwelling and making it available in exchange for the property; • Purchasing, rehabilitating or reconstructing an existing dwelling to make it comparable to the property; • Purchasing land and constructing a new replacement dwelling comparable to the dwelling when comparable dwellings are not otherwise available; • Purchasing an existing dwelling, removing barriers, or rehabilitating the structure to accommodate a handicapped displaced person when a suitable comparable replacement dwelling is not available; or • Providing a direct loan which will enable the displaced person to construct or contract for the construction of a decent, safe, and sanitary replacement dwelling.

ITEM/RESOURCE	AGENCY/AUTHORITY	MITIGATION/COMMITMENT
Compliance/Relocation and Right of Way Acquisition (continued)	FHWA and LADOTD/24 CFR 983.7	<p>Displaced individuals and families will be relocated within the community with access to services they are accustomed to, if desired, and are entitled to moving costs and certain moving-related expenses. For a homeowner, a purchase supplement may be provided in addition to the acquisition price for the residence. For tenants, rental assistance may be provided. LADOTD's relocation assistance brochure states that</p> <p style="padding-left: 40px;">Owner-occupants and tenants of 90 days or more may be eligible for a rental assistance payment. To be eligible for a rental assistance payment, tenants and owners must have been in occupancy at least 90 days immediately preceding initiation of negotiations for the property. This payment is designed to enable you to rent a comparable decent, safe, and sanitary (DSS) replacement dwelling for a 42-month period. If you choose to rent a replacement dwelling and the cost of rent and utilities are higher than you were paying, you may be eligible for a rental assistance payment. The Agency will determine the maximum payment you may be eligible to receive in accordance with established procedures. The rental assistance payment is paid in a lump sum unless the Agency determines that the payment should be in installments. You must rent and occupy a DSS replacement dwelling within one year to be eligible.</p> <p>Advanced or early acquisition to property owners. When advanced acquisition is offered to property owners, LADOTD will also offer relocation benefits prior to actual acquisition of the property.</p>

ITEM/RESOURCE	AGENCY/AUTHORITY	MITIGATION/COMMITMENT
Traffic Noise/Abatement Measures	FHWA/23 CFR part 772	Three noise barriers determined to be reasonable and feasible per LADOTD Traffic Noise Policy (2021) will likely be constructed/ public outreach to affected parties will be undertaken if necessary.
Approval/Replacement of Historic I-10 Calcasieu River Bridge and Removal of US 90 Overpass of I-10	FHWA and the Louisiana SHPO (LASHPO)/Section 106 of the NHPA & Section 4(f) of the Transportation Act	Offer the bridges for relocation through LADOTD Historic Bridge Marketing page. This commitment was completed.
Norris Point Archaeological Site	FHWA and the LASHPO/ Section 106 of the NHPA & Section 4(f) of the Transportation Act	Determine the boundary of the site submerged by Lake Charles and the Calcasieu River and conduct Phase III Data Recovery on the area of the site to be impacted by construction and demolition activities
Commitment/Migratory Birds	USFWS/Migratory Bird Treaty Act	Inspect bridges for active nests prior construction/demolition. Stop bridge construction and demolition activities if any found until the nests are inactive. Discourage the birds from returning prior to the nesting season. Tree clearing performed outside of the nesting season.
Commitment/Bald Eagles	USFWS and LDWF/Bald and Golden Eagle Protection Act	No mitigation needed for Alternative 5G. For Alternatives 3A and 3E, work within 1500 feet of known eagle nest, if found, to be avoided during nesting season. Night lighting and noise and discernible noise and vibration prohibited during nesting season
Commitment/West Indian Manatee	USFWS and NOAA Fisheries/Marine Mammal Protection Act	Mitigation measures during construction if manatee sighted within 50 feet of in-water construction zone. See Section 4.2.8 of the EIS for details on these measures.
Commitment/Invasive Species	LADOTD	BMPs will be used during construction to avoid the spread of any nuisance aquatic plant or animal species.

ITEM/RESOURCE	AGENCY/AUTHORITY	MITIGATION/COMMITMENT
Commitment/P3 Workforce Development Plan	LADOTD	<p>Develop a Project-Specific Workforce Development Plan that will at a minimum:</p> <ul style="list-style-type: none"> • Establish controls to ensure all laws, policies, and contract requirements are met and documented, including <ul style="list-style-type: none"> ○ Form FHWA-1273 'Required Contract Provisions Federal-Aid Construction Contracts' ○ Executive Orders 11246 and 11375 ○ Davis-Bacon Wages for Heavy (LA20230002 04/14/2023) and Highway (LA 20230013 01/06/2023) construction types • Affirm the commitment to maximize opportunities for socially and economically disadvantaged individuals in the Project vicinity, particularly in surrounding underserved communities • Provide for workforce recruitment efforts, including outreach events to the local community • Raise awareness of the workforce development program by working with schools, community organizations, and workforce development organizations • Provide for training and assistance to prospective and actual local employees to alleviate barriers to employment and promote retention • Provide DOTD funding availability for voluntary contractor participation in on-the-job training

ITEM/RESOURCE	AGENCY/AUTHORITY	MITIGATION/COMMITMENT
Commitment/P3 DBE Program	LADOTD	<p>Develop a Project-Specific DBE Participation Program that will at a minimum:</p> <ul style="list-style-type: none"> • Establish the approach and methodology to be followed for DBE participation, including <ul style="list-style-type: none"> ○ Female Participation Goal of 6.9 percent ○ Overall DBE Goal of 10.34 percent ○ Minority Participation Goal of 19.3 percent • Include mechanism to ensure the goals above are reached. • Include mechanisms to ensure DBE utilization, including monitoring, reporting, corrective actions, and adaptive management • Include strategies to develop subcontract work packages targeted to DBE contractors through scope of work right-sizing and specific advertisement to DBE contractors • Include details on participation in the United States Department of Labor (USDOL) Office of Federal Contract Compliance Programs (OFCCP) Mega Construction Project Program, which <ul style="list-style-type: none"> ○ Promotes compliance with non-discrimination and affirmative action obligations ○ Offers contractors and subcontractors compliance assistance and conducts compliance evaluations

6. MONITORING AND ENFORCEMENT

The FHWA and LADOTD are responsible for monitoring and enforcing mitigation measures listed in Section 4 of this ROD. LADOTD is also responsible for compliance assurance of all related commitments listed in Section 5 of this ROD. Agencies besides FHWA and LADOTD have regulatory jurisdiction over resources and issues that will be affected by the Project. These agencies must approve the proposed activities before construction can commence. Relative Permits, Mitigation, and Commitments are listed in **Table ROD-2**.

7. FINAL ENVIRONMENTAL IMPACT STATEMENT (FEIS) REVIEW

The I-10 Calcasieu River Bridge Improvements Project FEIS was made available for a 30-day public review on September 29, 2023. During that time, the FEIS document was made available on the Project Website (www.i10lakecharles.com/documentlibrary) and in hard copy at public and repository libraries, at LADOTD and its district office in Lake Charles, at FHWA's office in Baton Rouge, and at offices of various agencies in Lake Charles, Baton Rouge, and New Orleans.

Notification of availability of the FEIS included the following:

- Publication in the Federal Register (88 FR 67277 [September 29, 2023]).
- Publication of print advertisement in the Lake Charles American Press (local newspaper covering the Project area)
- Public and LADOTD website announcements (includes email blast to the MyDOTD email lists for I-10 and Calcasieu Parish)
- Emailed notices to all agencies on the Project contact list

US EPA, LDWF, USCG, and one individual submitted comments on the FEIS. These comments are summarized in **Table ROD-3**. FEIS comment letters and emails are included in **Appendix B**.

Table ROD-3: FEIS Public and Agency Comments

Commenter	Role in NEPA	Comment	Response to Comment
Jackson Hurst	Member of the Public	I have reviewed the Final Environmental Impact Statement (FEIS) for LaDOTD's I-10 Lake Charles Project, and I approve and support the findings in the FEIS.	Noted
US EPA	Agency	We appreciate the efforts FHWA and LADOTD have made with providing clarifying information as it relates the General Permit for Stormwater Discharges originating from the construction activities. EPA comments for the Draft EIS on December 22, 2022, have been addressed and we have no additional comments. We appreciate the opportunity to provide comments on this document and look forward to the receipt of the Record of Decision and your responses to these concerns. Once completed, please send our office an electronic copy of the Record of Decision when it is electronically filed with the Office of Federal Activities using the following link: https://www.epa.gov/nepa/e-nepa-guide-registration-and-preparing-eis-electronic-submission .	An electronic copy will be submitted when the ROD is completed
LDWF	Agency	LDWF supports the alternative 5G that involves the least negative impact to existing wetlands. With regard to fisheries concerns, this alternative is preferential because of the minimal impact to wetlands and other habitats. With regard to rare bird species, alternative 5G will have the least impact to a bald eagle nest near the project area. This alternative also has the lowest predicted number of crashes, which lessens the likelihood of spills. Ensure that the applicant provides adequate and appropriate mitigation for impacts to wetland functions.	Wetlands mitigation will be agreed to during permitting.

Commenter	Role in NEPA	Comment	Response to Comment
LDWF (Continued)	Agency	<p>The applicant shall properly install adequate erosion/siltation control measures around construction areas that require land based earthwork (i.e. excavation and/or deposition of fill materials, land contouring, machinery rutting, fill maneuvering and redistribution, etc.), to ensure that no project related sediments, debris and other pollutants enter adjacent wetlands or waters.</p> <p>Acceptable measures include but are not limited to the proper use and positioning of temporary silt fences, straw bales, fiber/core logs, wooden barriers, seeding or sodding of exposed soils, or other approved EPA construction site storm-water runoff control and best practices. Control techniques shall be installed prior to the commencement of earthwork activities and maintained until the project is complete and/or the subject areas are stabilized.</p> <p>Upon the completion of construction activities or if at any time construction activities cease for more than 14 days, all disturbed soils shall be re-vegetated by sod, seed, or another acceptable method, as necessary, to restore cover and prevent erosion.</p> <p>Inland Fisheries:</p> <ol style="list-style-type: none"> 1. During construction, improvements should be made to the drainage under the bridge to allow better flow of water leaving Westlake. Currently this ditch/canal is shallow from sediment runoff and full of Giant Cutgrass and Giant salvinia. 2. Any spoil removed from the ditch under the current bridge should be disposed of in such a manner as to not spread any nuisance aquatic plant or animal species (apple snails). 	<p>Best management practices will be implemented in accordance with the Stormwater Permit and Stormwater Pollution Prevention Plan.</p> <p>During construction of the Project, improvements will be made to the natural drainage under the bridge to better convey water through the right of way in accordance with drainage design guidelines. A commitment was made to use BMPs during construction to avoid the spread of any nuisance aquatic plant or animal species.</p>

Commenter	Role in NEPA	Comment	Response to Comment
USCG	Cooperating Agency	In an email dated January 9, 2024, the USCG stated that they would need an alternative that would meet the needs of current and prospective navigation on the waterway in the event that efforts to mitigate impacts are not met.	A follow up meeting between USCG, FHWA and DOTD was held on January 10, 2024, LADOTD provided information about the status of the proposed mitigation plan for impacted entities and identified the No Build Alternative as the alternative that would meet the reasonable needs of navigation without additional mitigation. The USCG agreed that their FEIS review comments were satisfied . Evidence of completion of the mitigation to the satisfaction of impacted organizations will be provided by LADOTD to the USCG before the Bridge Permit will be issued.

8. PROJECT FUNDING AND FINANCING

Phase 1 from I-10/I-210 West End to Ryan Street will cost approximately \$1.5 billion to construct. Tolling was evaluated as a revenue source to finance the first phase of the proposed project that includes the bridge, a significant portion of construction costs. A Traffic and Revenue study for tolling conducted as part of the financial feasibility analysis can be found in Appendix F of the DEIS.

Louisiana Act No. 519 of 2016 authorized LADOTD to solicit proposals for and enter into contracts for P3 projects for transportation facilities. The P3 allows a public entity, by contractual arrangement with the private sector, to share skills, assets, and risks to deliver a transportation facility for the use of the general public. Pursuit of a Public-Private Partnership (P3) agreement was initiated in January 2021 to attract private funds to build this phase.

The selected entity will enter into a comprehensive agreement for the design, construction, financing, as well as operation and maintenance of the first implementation phase of the proposed project. The construction phase is included in the fiscally constrained 2023-2026 Transportation Improvement Program (TIP) and State Transportation Improvement Program (STIP). Additional state, local and federal funding sources will be identified to present options for the ultimate funding mix and the second implementation phase. These could include the State's Transportation Trust Fund, State General Fund Appropriations, local contributions, federal discretionary grants, and formula funding.

Although tolling was a major concern of local stakeholders, and commenters expressed concern about the cost of the toll and the effect on I-210 traffic from drivers who would divert from I-10 to avoid paying the toll, tolling remains a funding option. Local residents will receive a discounted toll rate that equalizes the cost, in terms of time and vehicle maintenance, with the route using I-210. The Local Auto Rate will not exceed \$2.88 per trip expressed in 2021 dollars. To qualify for this rate, the resident's vehicle must be registered in a local jurisdiction. The discount would be applied to trips loaded on a transponder available for purchase online and at least two outlets in the Project Corridor. Actual toll rates will be established by the P3 concessionaire. Currently, the Local Auto Rate is estimated to be \$0.25, and the Non-Local Auto Rate is estimated to be up to \$3.75 per trip. The toll rates are subject to change based on the P3 contract, which has not yet been executed. There will be no material increases to toll rates except for adjustments due to inflation.

9. DETERMINATION

The I-10 Calcasieu River Bridge Improvements Project DEIS and the I-10 Calcasieu River Bridge Improvements Project FEIS are part of the environmental record for the I-10 Calcasieu River Bridge Improvements Project and support this ROD. These documents constitute the detailed statements required by NEPA (42 U.S.C. 4321 et seq.) and Title 23 of the U.S.C. on the following: the Project's environmental effects, adverse environmental effects that cannot be avoided if the Project is implemented, alternatives to the proposed Project, and the irreversible and

irretrievable effects on the environment that might be involved with the Project if it is implemented.

9.1. Environmentally Preferable Alternative

Council on Environmental Quality (CEQ) regulations [40 CFR 1505.2(b)] require the ROD to identify the environmentally preferable alternative. The environmentally preferable alternative is defined as the alternative that causes the least damage to the biological and physical environment and best protects, preserves, and enhances historic, cultural, and natural resources. Designation of the environmentally preferable alternative typically involves judgment and the balancing of some environmental values against others. CEQ notes that comments on the draft environmental documents such as the DEIS, the FEIS, and errata for this Project can assist the lead agency in developing and determining environmentally preferable alternatives. Although the No Build Alternative would cause less environmental impact overall, and therefore qualify as the environmentally preferable alternative, this alternative does not meet the Project's Purpose and Need. Of the alternatives that do satisfy the Project's Purpose and Need, Selected Alternative 5G is the environmentally preferable alternative. The Selected Alternative 5G will meet the Project needs as well as or better than the other alternatives including the No Build Alternative.

10. CONCLUSION

The Selected Alternative 5G chosen in this ROD will be implemented in segments as funding is made available. At this time, funding of Phase 1 (I-10/I-210 West End to I-10/I-210 East End) has been identified and the construction phase is included in the fiscally constrained 2023-2026 TIP and STIP.

This ROD identified and provided a list of specific mitigation and Project commitments. These mitigation measures and commitments will be implemented in each phase of the I-10 Calcasieu River Bridge Improvements Project as appropriate.

The environmental record for this decision includes the following documents:

- I-10 Calcasieu River Bridge Improvements Draft Environmental Impact Statement (DEIS), including appendices
- I-10 Calcasieu River Bridge Improvements Final Environmental Impact Statement (FEIS), including appendices

These documents, incorporated here by reference, constitute the statements required by NEPA and Title 23 of the United States Code on:

- The environmental impacts of the Project,
- The adverse environmental effects that cannot be avoided should the Project be implemented,
- Alternatives to the proposed Project, and
- Irreversible and irretrievable impacts on the environment that may be involved with the Project should it be implemented.

Having carefully considered the environmental record noted above, the mitigation measures as required herein, the written and verbal comments offered by other agencies and the public on this record, and the written responses to the comments, the Selected Alternative 5G has been determined to be the environmentally preferable option as discussed in Section 2.4 of the FEIS and above. The Selected Alternative 5G represents the best option for construction of the Project. LADOTD and FHWA will ensure that the commitments outlined will be implemented as part of final design, construction, and post-construction monitoring.

Appendix A:
Supplemental Targeted Environmental Justice Outreach Summary Report Executive Summary

EXECUTIVE SUMMARY

PURPOSE

This summary report documents the outreach efforts undertaken by The Louisiana Department of Transportation and Development (LADOTD) to engage members of the public, specifically minority and low-income populations defined as environmental justice (EJ) communities, who may experience disproportionately high and adverse effects (DHAE) as a result of the I-10 Calcasieu River Bridge Improvements Project (the Project). The proposed Project is approximately nine (9) miles in length and includes alternatives for improvements to I-10 in the Lake Charles, Louisiana, region between the I-210 interchanges, including replacement of the Calcasieu River Bridge. Direct engagement of identified and affected EJ communities is critical to ensuring that EJ communities have had sufficient opportunities to provide feedback on decisions made during the National Environmental Policy Act (NEPA) review process. The information collected will be made available to decision makers before the Record of Decision (ROD) for the project is approved.

On October 24, 2023, the Louisiana Joint Legislative Committee on Transportation voted not to approve the current version of the proposed Public-Private Partnership (P3) that would have designed and constructed Phase 1 of the Project (from I-10/I-210 on the West End to Ryan Street). Therefore, the funding and financing presented in the FEIS have changed; consequently, the segmentation and the timing of phases presented in the DEIS and FEIS have also changed and will depend on the delivery mechanism selected. However, the value of the environmental documentation relative to project impacts, mitigation of project impacts, and the Selection of Alternative 5G remains. Tolling is still a funding option for the Project. Alternate delivery methodologies are also being considered; these include traditional financing methods, a different P3 model, and other innovative procurement options. Responses to public comments regarding the project delivery methodologies of a Public-Private Partnership (P3) and tolling may be inapplicable if an alternate project financing and delivery methodology is selected. Construction of the Project from Ryan Street to I-10/I-210 West End is not scheduled but preliminary programming suggests construction activities would commence not sooner than 2040.

METHODOLOGY

In addition to prior outreach efforts including four public meetings and one open-house public hearing, input from the EJ communities in the proposed Project area continued to be sought through various methods including contact with local officials and identification of community leaders.

In the summer of 2023, a supplemental targeted EJ outreach strategy was devised to use in-person surveys, feedback received on the Project website (i10lakecharles.com), emails and phone calls to identify property owners and other interested parties to directly invite them to

several outreach events. A series of steps were taken to find their contact information and communicate with them. Research included review of tax assessor data, searches through a telephone directory subscription service, and a search of project sign-in sheets and other documents with contact information. A flyer combined with a questionnaire was distributed to homes and businesses abutting the corridor in August 2023. It was filled out on site or left at the door for return via email, text, or phone.

Website and contact information were provided on the flyer-questionnaire. To make sure that the channels of communication were tailored to everyone's capabilities, the flyer-questionnaire asked about individual preferences. The questions included the type of communication, i.e., phone or email, and the format of informational event, i.e., In-Person Meeting, Phone Call, Online Meeting, Mail Survey, Online Survey, or No Preference. Preferences for weekday or weekend, and time of day were also solicited. In addition to queries of tax assessor data and property owners, residents, and businesses, the Project team asked attendees at a Project meeting on August 31, 2023, at the Lake Charles Civic Center to fill in the flyer-questionnaires, which were collected on site. These people were then located by address, and those who provided addresses within the Project EJ communities were added to the contact list.

The first event was a group teleconference call on September 26, 2023, set up to accommodate those people who expressed a preference for a phone event or had no preference about the format of the event. A second event—a ZOOM meeting with slideshow presentation—was held on October 9, 2023, and everyone on the contact list including those who attended the conference call was invited. Subsequently, the Project team sent emails and made follow-up phone calls to those people who had accepted one of the invitations or learned of the events by word of mouth and contacted the Project team.

RESULTS

Contact information for a total of 129 persons was compiled. Twenty-nine (29) persons received an invitation to the September 26 Conference Call meeting, with 17 stating they would attend. Six (6) persons attended and provided feedback.

For the October 9 ZOOM meeting, 44 persons, including the people who accepted the invitation for the conference call but did not attend, were successfully contacted and invited. Twelve (12) persons accepted the invitation and 13 attended. Several participants not on the original invitation list received the link to the meeting through others. Persons who accepted the invitations to one or both meetings but did not attend (total n=17) received multiple follow-up phone calls offering them a future engagement opportunity.

To ensure that the feedback received was representative of individuals that comprise the EJ communities and would be directly affected by the project, several individuals were offered follow-up phone interviews as a third outreach opportunity. This group included people who had received information through their neighbors or other word of mouth networks and who

contacted the Project team, people who received a flyer-questionnaire left at their residence or business and delayed responding, and people who had been in contact with the Project team in previous years but did not respond to any of the recent public involvement events. Three attempts in addition to the phone campaign and door-to-door canvassing were made to contact the Sharon Chapel, a church on Belden Street that will be displaced in Phase 2. This outreach was not successful.

Out of 129 people who were contacted by the Project team, there have been 23 instances of feedback at the three outreach events. Adjusting for one person who attended more than one event and two people who live in the same household, makes the effective number 21.

The feedback received can be considered representative of the EJ communities as follows:

- Ten residential properties, two of which will be displaced in Phase 2 of the Project.
- Three businesses, one of which will be displaced in Phase 1 of the Project.
- Two properties where frontage will be acquired for right of way—one property has a structure on it that would not be taken; the other property is an empty lot (Phase 2).
- Two properties located on streets that would be closed to through traffic; one in Westlake (Phase 1) and one on Boston Street (Phase 2).
- One residential property located in Westlake on Kile Street which will be acquired in Phase 1.
- Two property owners or owner-representatives who grew up in their respective neighborhoods and have seen them decline; one owner is a landlord (Phase 2) who lives in Texas and the other rebuilt the home for her mother after the hurricanes of 2020 (Phase 2).
- One couple who lives on the same block with the wife's family that has been in the neighborhood for generations.
- Six residences and three businesses directly affected by highway traffic noise.
- Four labor union representatives, one technical college representative, and one resident who were eager to be connected to jobs and training opportunities.
- One person who uses the I-10 Calcasieu River Bridge to commute and travel for work; one person who used to use the bridge to travel to work but is now retired and uses I-210 instead.

CONCLUSION

Throughout the life of this Project and particularly during its environmental phase, intentional outreach to EJ communities in the Project corridor has been conducted. This outreach has offered EJ community members multiple opportunities to share their concerns, provide input and feedback on aspects of the Project that will directly impact them, their families, their businesses and workplaces, and their community connections. Information about how to stay informed as the Project moves forward has been and will continue to be provided through the public information channels managed by LADOTD and through the Project website

(i10lakecharles.com).

The 2023 supplemental targeted EJ outreach events were designed to reach as many individuals within the EJ communities as possible, and to provide opportunities for the identification of additional DHAE. The discussions were interactive, and feedback about these impacts and the proposed mitigation was collected from each individual representing themselves, their businesses, or family members. To ensure that the responses were representative of the diversity of the communities and the type of impact, the Project team searched for and contacted owners of property that would be acquired for right of way as frontage only, residents and businesses that would be relocated due to acquisition of the entire property, and residents who would be directly affected by street closures and traffic noise.

Also discussed were the Active Transportation Allowance set-aside funding, replacement of significant trees (and other landscape/hardscape considerations), and workforce development and opportunities for Disadvantage Business Enterprises (DBE) to participate in the construction, operation, and maintenance of the Project. At the end of each event, the discussion was opened to comments and thoughts about the proposed tolling of the bridge along with other topics proposed by participants.

Contact information for LADOTD Real Estate representatives and the Project team was provided during all supplemental EJ outreach events in order to ensure that EJ communities continue to have access to information and assistance as the Project moves forward.

In general, the feedback demonstrated that the respondents were satisfied with the proposed mitigation for the impacts discussed. They did not express any concerns about the acquisition and relocation processes. Two people requested advanced acquisition of their properties, which are located in Phase 2 of the Project. No one expressed concerns about noise walls, landscaping, or active transportation expenditures. Two respondents commented that their neighborhoods have been in decline for a long time and that mitigation like noise walls and enhancements like landscaping would be welcome. Both these respondents opined that it may be too late because the community they knew growing up is no longer there. The one respondent from Westlake was most concerned about the trains sitting on the tracks for an hour and the need to detour to a dirt road to get through.

Only one person stated that she would avoid the bridge if a toll were required. Several people commented that they were concerned for poor people. A few expressed the opinion that the proposed amount of \$0.25 to \$2.88 per trip seemed reasonable. One person who represents a homeowner in Westlake stated that the bridge situation causes a lot of stress on people who have to cross the river for everyday activities.

DHAE discussed during the EJ outreach included right of way acquisition; displacements and relocations; traffic noise; tree removal and replacement landscaping. In addition, transportation facilities for people who bicycle, walk, and use active forms of transportation and programs for

workforce development, job training, and participation by DBEs were presented for comment. An opportunity for comment on the proposed tolling and toll rates was also offered.

The results of the supplemental targeted EJ outreach campaign confirmed that the respondents either living in or owning businesses or properties in the EJ communities are satisfied with the findings regarding DHAE and the proposed mitigation presented in the Final Environmental Impact Statement (FEIS). No one offered any new concerns or issues that would constitute a DHAE for these communities. No one suggested additional forms of mitigation.

Appendix B:
Public and Agency Letters and Emails of Comments on the
Final Environmental Statement

From: [Jackson Hurst](#)
To: [CalcasieuBridge](#)
Subject: I-10 Lake Charles FEIS Public Comment
Date: Wednesday, September 27, 2023 5:29:33 PM

Name - Jackson Hurst

Address - [REDACTED]

Comment - I have reviewed the Final Environmental Impact Statement (FEIS) for LaDOTD's I-10 Lake Charles Project and I approve and support the findings in the FEIS.

sent from [REDACTED]

Meredith Taylor

Subject: FW: EPA Final EIS Comment Letter for the I-10 Calcasieu River Bridge Improvement Project
Attachments: EPA FEIS Comment Letter for the I-10 Calcasieu River Bridge Project.pdf

From: Gruta, Gabriel <Gruta.Gabriel@epa.gov>
Sent: Tuesday, October 24, 2023 10:20 AM
To: Breland, Larry (FHWA) (larry.breland@dot.gov) <larry.breland@dot.gov>
Cc: Paul Vaught III (DOTD) <Paul.VaughtIII@LA.GOV>; Noel Ardoin <Noel.Ardoin@LA.GOV>; Houston, Robert <Houston.Robert@epa.gov>
Subject: EPA Final EIS Comment Letter for the I-10 Calcasieu River Bridge Improvement Project

EXTERNAL EMAIL: Please do not click on links or attachments unless you know the content is safe.

Dear Mr. Breland,

Attached please find the EPA Final EIS Comment Letter for the I-10 Calcasieu River Bridge Improvement Project. Should you have any questions, you can reach me by phone at (214) 665-2174 or by replying to this email.

Sincerely,

Gabe Gruta
NEPA Specialist
Office of Communities, Tribes and Environmental Assessment
U.S. Environmental Protection Agency
1201 Elm Street, Suite 500 (ORACN)
Dallas, Texas 75270-2102



REGION 6

DALLAS, TX 75270

October 20, 2023

VIA Electronic Mail

Mr. Larry Breland
Environmental Protection Specialist
Federal Highway Administration
5304 Flanders Drive, Suite A
Baton Rouge, Louisiana 70808
larry.breland@dot.gov

Dear Mr. Breland:

The Region 6 office of the U.S. Environmental Protection Agency (EPA) has reviewed the Federal Highway Administration (FHWA) Final Environmental Impact Statement (EIS) for the I-10 Calcasieu River Bridge Improvement Project located in Calcasieu Parish, Louisiana. The Final EIS was reviewed pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality regulations (40 CFR Parts 1500 – 1508), and by our NEPA review authority under Section 309 of the Clean Air Act.

FHWA and the Louisiana Department of Transportation and Development (LADOTD) propose to improve I-10 between the I-10/I-210 west and I-10/I-210 east interchanges in Calcasieu Parish, Louisiana. The proposed project length is approximately 9 miles and includes the interstate roadways and ramps, the bridge approaches, the I-10 service roads, and interchanges at PPG Drive, Sampson Street, North Lakeshore/Ryan Street, Enterprise Boulevard, and Opelousas Street that connect the interstate to state roads and local streets. The I-10 Calcasieu River Bridge and specified portions of the interstate would be reconstructed to provide a minimum of six lanes of control of access, divided highway between the interchanges at I-210 West End and I-210 East End. Reconstruction of the identified areas would also include several overpasses, interchange ramps, and 2 service roads to ensure that the vertical clearance, horizontal alignment, acceleration, deceleration, weaving distances, and other road and bridge elements meet current design guidelines to the extent practicable.

We appreciate the efforts FHWA and LADOTD have made with providing clarifying information as it relates the General Permit for Stormwater Discharges originating from the construction activities. EPA comments for the Draft EIS on December 22, 2022, have been addressed and we have no additional comments. We appreciate the opportunity to provide comments on this document and look forward to the receipt of the Record of Decision and your responses to these concerns. Once completed, please send our office an electronic copy of the Record of Decision when it is electronically filed with the Office of Federal Activities using the following link: <https://www.epa.gov/nepa/e-nepa-guide->

[registration-and-preparing-eis-electronic-submission](#). If you have any questions, please contact Gabe Gruta, project review lead at 214-665-2174 or gruta.gabriel@epa.gov.

Sincerely,

Robert Houston
Acting Director
Office of Communities, Tribes and
Environmental assessment

cc: Paul Vaught III
Noel Ardoin

Water Quality Protection Comments

1. In 3.8.5 Water Quality, the lead agency states that the proposed bridge improvement project “provides an opportunity to reduce nonpoint [source] pollution into [the impaired waterbodies] by directing stormwater from the bridges into drainage ditches/other vegetated areas.”

EPA recommends that the lead agency take this opportunity to implement features into their bridge design that would best capture and control stormwater runoff pollution. We ask that it also include details on these potential design features in the Final EIS. Implementation of these stormwater control features would have a beneficial impact on the quality of the waterbodies in the project area.

The Draft EIS identifies four waterbodies in the project area that are listed as impaired according to Louisiana’s 2022 303(d) List. Three of those impaired waterbodies (LA030302_00, LA030702_00, LA030306_00) designate a form of stormwater pollution as a “suspected or probable source of impairment”. EPA has published several guidelines, which the lead agency may choose to refer to, that detail methods to control and capture stormwater pollution in highways and bridges.

The published EPA guidelines can be found from the following hyperlinks:

<https://www.epa.gov/system/files/documents/2021-11/bmp-roadway-and-bridge-maintenance.pdf>

https://www.epa.gov/sites/default/files/2015-09/documents/urban_ch07.pdf

Response:

The Draft EIS identifies four waterbodies in the project area from the 2019 303(d) list: LA030301-Calcasieu River and Ship Channel, LA 30302-Lake Charles, LA030306-Bayou Verdine, and LA030702-English Bayou. As stated in the document, the project crosses Kayouche Coulee, a tributary to English Bayou (LA030702). No map was available at the time of the writing. Since then LDEQ has published an interactive map

<https://ldeq.maps.arcgis.com/apps/instant/portfolio/index.html?appid=a689bc37c40848f598a1937d092f63ae%20>, which confirms that Kayouche Coulee is not on the 303(d) list. See Figure 1.

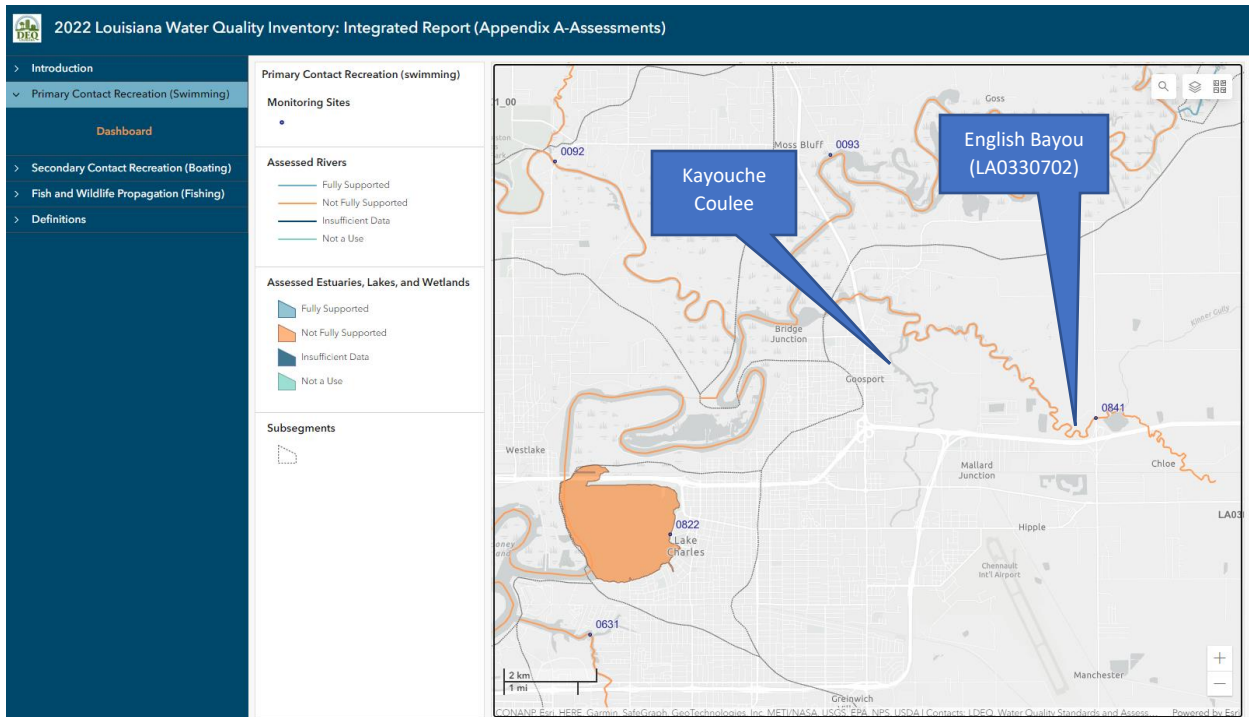


Figure 1 – 2022 303(d) List Interactive

The **Corrected Final Louisiana’s 2022 Section 303(d)** list approved August 19, 2022, confirms that the other three waterbodies continue to be listed as impaired, but the suspected sources of impairment are listed as shown in **Table 1**:

Table 1: Corrected Final Louisiana's 2022 Section 303(d)

Subsegment Number	Subsegment Description	Suspected Causes of Impairment	Suspected Sources of Impairment
LA030301_00	Calcasieu River and Ship Channel-From saltwater barrier to Moss Lake; includes Ship Channel, Coon Island Loop, and Clooney Island Loop (Estuarine)	Dioxin – Fish Consumption Advisory	Industrial Point Source Discharge
		Dioxin – Fish Consumption Advisory	Source Unknown
		Furan Compounds	Industrial Point Source Discharge
		Furan Compounds	Source Unknown
		Enterococcus	Natural Sources
		Enterococcus	On-site Treatment Systems (Septic Systems and Similar Decentralized Systems)
LA030302_00	Lake Charles	Dioxin – Fish Consumption Advisory	Industrial Point Source Discharge
		Dioxin – Fish Consumption Advisory	Source Unknown
		Dissolved Oxygen	Discharges from Municipal Separate Storm Sewer Systems (MS4)
		Dissolved Oxygen	Sanitary Sewer Overflows (Collection System Failures)
		Dissolved Oxygen	Source Unknown
		Furan Compounds	Industrial Point Source Discharge
		Furan Compounds	Source Unknown
		Enterococcus	Natural Sources
		Enterococcus	On-site Treatment Systems (Septic Systems and Similar Decentralized Systems)
		Enterococcus	Source Unknown
LA030306_00	Bayou Verdine-south of the Houston River Canal to the Calcasieu River (Estuarine)	Turbidity	Construction Stormwater Discharge (Permitted)
		Enterococcus	Natural Sources
		Enterococcus	On-site Treatment Systems (Septic Systems and Similar Decentralized Systems)

As shown in Table 1, nonpoint sources are not a major source of impairment. Except for construction stormwater discharge (permitted) for Bayou Verdine, none of the waters are impaired by suspected sources from stormwater runoff. Therefore, the benefits of any special measures to address stormwater runoff would not offset the additional costs of design, construction, and maintenance. For this reason, the bridge will be designed in accordance with standard LADOTD requirements and applicable design manuals such as the LADOTD Bridge Design and Evaluation Manual. The Manual does not stipulate any requirement for stormwater runoff after it leaves the structure.

The Permits, Mitigation, and Commitments table in the Draft EIS specifies that a General Permit for Storm Water Discharges from Construction Activities will be secured from LDEQ. The permit requires preparation of a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP will outline all the measures and best management practices to protect the project area waters from construction activities.

2. In 3.12 Hazardous Waste Sites, the Draft EIS states that levels of ethylene dichloride and vinyl chloride above the maximum contaminant level (MCL) have been detected in the groundwater of the project area. The source of these contaminants is attributed to chemical spills/releases from Phillips 66. It is known that these chemicals are harmful to human health.

EPA recommends that LADOTD address these contaminants detected in the sediments of Lake Charles or other waters in the project area. Please include potential impacts to aquatic life from resuspension of these chemicals from bridge construction/demolition activities. We ask that LADOTD also consider implementing best management practices that would mitigate resuspension of contaminated sediments during construction.

Response:

The EDC plumes are located approximately 2500 feet west of the Calcasieu River and Lake Charles at depths ranging from approximately -40 to -58 feet NAVD 88 in 2021 (see Appendix O of the Draft EIS). No evidence has been presented that the contamination migrated to the lake, which sits at an elevation of 13 feet Mean Sea Level (MSL) with an approximate depth of 9 feet. These known facts about the topography and expected fate and transport of EDC and vinyl chloride from the releases in 1987 and 1994, support a conclusion that the sediments of Lake Charles were not contaminated by EDC and vinyl chloride. Therefore, LADOTD did not sample the sediments of the lake.

Groundwater Comments

1. EPA recommends that LADOTD provide sampling data from additional borings being installed northwest of the plume area. Sampling data from this area could provide more conclusive analysis on the impact to groundwater in the project area.

Response:

The sample data for the additional borings is provided in the attached report.

Environmental Justice (EJ) Comments

1. Minority and economic factors have been identified in the Draft EIS that signify the presence of EJ populations within the East End Section of the main project corridor [Section 3.3 (3-8, 3-9)]. The main build Alternatives 3A, 3E, and 5G realignments will cause displacements to mostly minority residents (3-15). Alternatives 3A and 3E would displace 21 residential homes, and of those 19 are minority. The same 19 minority homes would be displaced in Alternative 5G (3-15).

Executive Order (EO) 12898 explains that “disproportionately high and adverse effect” on EJ populations exists if there is an “adverse effect that is predominantly borne by a minority population and/or low-income population.” All displacements for this project would occur in census blocks that meet EJ thresholds. With the use of LADOTD EJ data, it shows that all but 2 displacements would in fact be low-income or minority population. Based on EO 12898 guidance, the Draft EIS EJ statistical and demographic information also points out the “disproportionately high and adverse effect” on EJ populations.

EPA recommends that LADOTD ensure the evaluation and mitigation measures are adequate and implemented, since the LADOTD have recognized that the I-10 Calcasieu River Bridge Improvements Project will adversely impact minority and low-income populations within the project study and construction/operational areas.

We recommend that LADOTD institute mitigation measures that would prevent the proposed I-10 Calcasieu River Bridge Improvements project from creating additional disproportionate adverse impacts to minority, low-income populations/communities, which may be already overburden.

Response:

The Final EIS published in the Federal Register on 9/29/2023 and distributed to agencies prior to publication contains substantial errata related to the EJ communities in the project area. In response to comments from FHWA, the Environmental Justice Technical Memorandum was revised and is included as Appendix E of the Final EIS. In the DEIS Errata Sheets (Section 4 of the Final EIS), LADOTD has added several commitments related to EJ impacts including increasing the threshold for reasonableness of noise barriers to abate traffic noise, targeted EJ outreach, and advanced acquisition of properties to owners who are interested.

The targeted EJ outreach consists of contacting businesses, residents, and property owners directly affected by the Project to solicit input and consider their needs regarding impacts and mitigation of disproportionately high and adverse effects from right of way acquisition, displacements, traffic noise, aesthetics, landscaping, and Context Sensitive Solutions and Design

elements. In addition to prescribed measures, mitigation such as advanced acquisition and relocation services as well as consideration of maintaining proximity to services and family will be offered. The results of the additional EJ outreach will be published in the Record of Decision.

From: Dave Butler <dbutler@wlf.la.gov>

Sent: Friday, October 20, 2023 9:49 AM

To: CalcasieuBridge <CalcasieuBridge@HNTB.com>

Subject: LDWF Comments for H003931 I-10 Calcasieu River Bridge Improvements Final Environmental Impact Statement

To Whom It May Concern:

Ecological Studies:

LDWF supports the alternative 5G that involves the least negative impact to existing wetlands. In regards to fisheries concerns, this alternative is preferential because of the minimal impact to wetlands and other habitats. In regards to rare bird species, alternative 5G will have the least impact to a bald eagle nest near the project area. This alternative also has the lowest predicted number of crashes, which lessens the likelihood of spills.

Ensure that the applicant provides adequate and appropriate mitigation for impacts to wetland functions.

The applicant shall properly install adequate erosion/siltation control measures around construction areas that require land based earthwork (i.e. excavation and/or deposition of fill materials, land contouring, machinery rutting, fill maneuvering and redistribution, etc.), to ensure that no project related sediments, debris and other pollutants enter adjacent wetlands or waters. Acceptable measures include but are not limited to the proper use and positioning of temporary silt fences, straw bales, fiber/core logs, wooden barriers, seeding or sodding of exposed soils, or other approved EPA construction site storm-water runoff control and best practices. Control techniques shall be installed prior to the commencement of earthwork activities and maintained until the project is complete and/or the subject areas are stabilized.

Upon the completion of construction activities or if at any time construction activities cease for more than 14 days, all disturbed soils shall be re-vegetated by sod, seed, or another acceptable method, as necessary, to restore cover and prevent erosion.

Inland Fisheries:

1. During construction, improvements should be made to the drainage under the bridge to allow better flow of water leaving Westlake. Currently this ditch/canal is shallow from sediment runoff and full of Giant Cutgrass and Giant salvinia.
2. Any spoil removed from the ditch under the current bridge should be disposed of in such a

manner as to not spread any nuisance aquatic plant or animal species (apple snails).

Sincerely,

Dave Butler
Permits Coordinator
Louisiana Department of Wildlife and Fisheries
2000 Quail Drive
Baton Rouge, LA 70808
(504) 286-4173 New Orleans Office
(225) 763-3595 Baton Rouge Office



Lynn Maloney-Mujica

From: Blakemore, Douglas A CIV USCG D8 (USA) <Douglas.A.Blakemore@uscg.mil>
Sent: Tuesday, January 9, 2024 11:56 AM
To: Lynn Maloney-Mujica
Subject: I-10 BRIDGE ACROSS THE CALCASIEU RIVER EIS

Ms. Maloney-Mujica, this Coast Guard bridge permit will be signed by our Coast Guard Office of Bridge Administration located in Washington D.C. They provided the below comments on the EIS. Please call me if you would like to discuss or need further information.

As we stated in the attached letters, dated November 13, 2017 and January 12, 2023, and as identified in the Final Navigation Study, dated September 4, 2014, 127 feet of vertical clearance would meet the reasonable needs of navigation. The FEIS does not include an alternative that would meet the reasonable needs of current and prospective navigation on the waterway. The Coast Guard needs such an alternative to adopt the FEIS in the event efforts to mitigate impacts to upstream waterway users are not met.

Doug Blakemore
Eighth Coast Guard District
Bridge Administrative Branch
500 Poydras Street
New Orleans, LA 70130
504.671.2127
618.225.7727