

APPENDIX A

Public Comments Received During the 45-day Comment Period After NOA and Responses

Appendix A.1
DEIS and Public Hearing Comments and
Responses Matrix

Comments Received During the 45-day Comment Period After the NOA of the DEIS and Comment Responses

Name (Last / First)	Date	Source	Comment(s)	Response ID and Theme	Response
Anonymous	12/14/2022	Voicemail	There better not be a toll on the Calcasieu River bridge. We pay taxes. We send money to other countries that don't deserve it for climate, and we can't even get a bridge built with all the taxes we pay? This is ridiculous. This is our Democratic governor trying to put it to us.	Comment Response A. Theme A: Opposition to tolls/concerns about funding	A: Without tolls, the I-10 Calcasieu River Bridge Improvements project would not be financially feasible. LADOTD has been authorized by the legislature to move forward with a P3 for the first phase. The state will be responsible for the balance of the project from Ryan Street to I-10/I-210 East End. To date, \$800 million have been designated for the I-10 Calcasieu River Bridge project. The sources of that amount are divided between state allocations of \$575 million, and direct federal funding of \$225 million. \$150 million of the federal funds were recently awarded through the Infrastructure Investment and Jobs Act (IIJA; aka the Bipartisan Infrastructure Law) Mega Grant Program. The first phase of the Calcasieu River Bridge Improvements Project (I-10/I-210 West End to Ryan Street) is estimated to cost \$1.5 billion, thus leaving a funding gap of \$700 million. That gap will be filled with private investment funds through a Private-Public Partnership (P3), which will complete the design, construct the project, and operate the facility over a 50-year period. The tolls collected will cover the P3 costs and pay the partners a return on their investment. An additional \$140 million has been committed from the State General Fund and the Highway Priority Program for right of way and other pre-construction costs. For more information, please see Section 3.16.16 of the DEIS as well as the Traffic and Revenue Analysis issued in 2021 as part of Appendix F (Preliminary Financial Feasibility Report) of the DEIS.
Baty, Buddy	12/13/2022	Public Hearing Comment Card	No tolls. I own a trucking company in Sulphur. I pay 100s of thousands of dollars yearly and have for 30 years. I don't feel paying tolls is fair to the public.	Comment Responses A and B. Theme A: Opposition to tolls/concerns about funding and Theme B: Impacts on freight	A: Without tolls, the I-10 Calcasieu River Bridge Improvements project would not be financially feasible. LADOTD has been authorized by the legislature to move forward with a P3 for the first phase. The state will be responsible for the balance of the project from Ryan Street to I-10/I-210 East End. To date, \$800 million have been designated for the I-10 Calcasieu River Bridge project. The sources of that amount are divided between state allocations of \$575 million, and direct federal funding of \$225 million. \$150 million of the federal funds were recently awarded through the Infrastructure Investment and Jobs Act (IIJA; aka the Bipartisan Infrastructure Law) Mega Grant Program. The first phase of the Calcasieu River Bridge Improvements Project (I-10/I-210 West End to Ryan Street) is estimated to cost \$1.5 billion, thus leaving a funding gap of \$700 million. That gap will be filled with private investment funds through a Private-Public Partnership (P3), which will complete the design, construct the project, and operate the facility over a 50-year period. The tolls collected will cover the P3 costs and pay the partners a return on their investment. An additional \$140 million has been committed from the State General Fund and the Highway Priority Program for right of way and other pre-construction costs. For more information, please see Section 3.16.16 of the DEIS as well as the Traffic and Revenue Analysis issued in 2021 as part of Appendix F (Preliminary Financial Feasibility Report) of the DEIS. B: The P3 agreement will contain controls to ensure that tolling will not unduly burden any single mode of transportation, including freight. These controls will be drawn from national tolling norms and practices.
Bourgeois, Ben	12/14/2022	Email	I am absolutely against having a toll on the new Calcasieu River I-10 bridge at Lake Charles. The state and the federal government can and should find financing via. the normal public financing process. I am against engaging in a public/private partnership for such critical infrastructure as the I-10 bridge. The use of the new I-10 bridge should Not be utilized to harvest money from the public into perpetuity through a toll. I accept that the replacement of the bridge will be a financial cost to the public, but it should be a shared tax just as is done for our other road projects.	Comment Responses A, C, and F. Theme A: Opposition to tolls/concerns about funding, Theme C: Impacts on low-income persons, and Theme F: P3; Public fund allocation	A: Without tolls, the I-10 Calcasieu River Bridge Improvements project would not be financially feasible. LADOTD has been authorized by the legislature to move forward with a P3 for the first phase. The state will be responsible for the balance of the project from Ryan Street to I-10/I-210 East End. To date, \$800 million have been designated for the I-10 Calcasieu River Bridge project. The sources of that amount are divided between state allocations of \$575 million, and direct federal funding of \$225 million. \$150 million of the federal funds were recently awarded through the Infrastructure Investment and Jobs Act (IIJA; aka the Bipartisan Infrastructure Law) Mega Grant Program. The first phase of the Calcasieu River Bridge Improvements Project (I-10/I-210 West End to Ryan Street) is estimated to cost \$1.5 billion, thus leaving a funding gap of \$700 million. That gap will be filled with private investment funds through a Private-Public Partnership (P3), which will complete the design, construct the project, and operate the facility over a 50-year period. The tolls collected will cover the P3 costs and pay the partners a return on their investment. An additional \$140 million has been committed from the State General Fund and the Highway Priority Program for right of way and other pre-construction costs. For more information, please see Section 3.16.16 of the DEIS as well as the Traffic and Revenue Analysis issued in 2021 as part of Appendix F (Preliminary Financial Feasibility Report) of the DEIS. C: Measures to address the impacts of tolling on low-income persons include the establishment of a local auto-rate toll that will not exceed \$2.88 per trip expressed in 2021 dollars. A more comprehensive explanation is included in the Draft EIS, specifically pages 3-15 to 3-20. Toll rates will escalate over time with inflation. F: Funding Commitments and Sources for Construction of the I-10 Calcasieu River Bridge Improvements Project are listed below: \$85 million – State General Obligation Bonds - \$10 million in Priority 1 + \$75 million in Priority 5; \$30 million – Coronavirus Response and Relief Supplement Act (CRRSA) – Federal legislation enacted in December 2020; \$50 million – Louisiana Rescue Plan Fund (e.g., 2021 American Rescue Plan) – 2021 Appropriation through Act 485; \$100 million – Louisiana Rescue Plan Fund (e.g., 2021 American Rescue Plan) – 2022 Appropriation through Act 117; \$100 million – State General Fund – 2022 Appropriation through Act 167; \$150 million – Infrastructure Investment and Jobs Act (IIJA) – 2022 discretionary grant award (\$600 million requested); \$240 million – First six years of Vehicle Sales Tax – dedication through Act 486 (2021)/Act 505 (2022); \$45 million – Transportation Trust Fund (Federal) – allocation from Highway Priority Program; \$800 million – Total funding commitments for construction

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Bourque, Hannah	12/14/2022	Email	This is a really bad idea that affects poorer families and businesses that have work or relatives on the other side of the bridge. All this will do is force people to spend more money they do not have (wether (sic) paying a toll or burning more gas going an alternate route). I personally have a low income family that has relatives in sulphur. If this toll is implemented it will affect how often I can visit them considering I live in a part of lake Charles where the fastest and most fuel efficient route is I-10 bridge. I have lived here all my life and pay my taxes I do not feel it is right to toll the residents of calcasieu parish to cross a bridge they have been crossing for free since it was built especially when we HAVE the money to fund the bridge. I just ask to please consider the people and the affects it will have on them.	Comment Responses A, C, and F. Theme A: Opposition to tolls/concerns about funding, Theme C: Impacts on low-income persons, and Theme F: P3; Public fund allocation	A: To date, \$800 million have been designated for the I-10 Calcasieu Bridge project. The sources of that amount are divided between state allocations of \$575 million, and direct federal funding of \$225 million. \$150 million of the federal funds were recently awarded through the Infrastructure Investment and Jobs Act (IIJA; aka the Bipartisan Infrastructure Law) Mega Grant Program. The first phase of the Calcasieu River Bridge Improvements Project (I-10/1-210 West End to Ryan Street) is estimated to cost \$1.5 billion, thus leaving a funding gap of \$700 million. That gap will be filled with private investment funds through a Private-Public Partnership (P3), which will complete the design, construct the project, and operate the facility over a 50-year period. The tolls collected will cover the P3 costs and pay the partners a return on their investment. An additional \$140 million has been committed from the State General Fund and the Highway Priority Program for right of way and other pre-construction costs. Without tolls, this project would not be financially feasible. LADOTD has been authorized by the legislature to move forward with a P3 for the first phase. The state will be responsible for the balance of the project from Ryan Street to I-10/I-210 East End. For more information, please see Section 3.16.16 of the DEIS as well as the Traffic and Revenue Analysis issued in 2021 as part of Appendix F (Preliminary Financial Feasibility Report) of the DEIS. C: Measures to address the impacts of tolling on low-income persons include the establishment of a local auto-rate toll that will not exceed \$2.88 per trip expressed in 2021 dollars. A more comprehensive explanation is included in the Draft EIS, specifically pages 3-15 to 3-20. Toll rates will escalate over time with inflation. F: Funding Commitments and Sources for Construction of the I-10 Calcasieu River Bridge Improvements Project are listed below: <ul style="list-style-type: none"> • \$ 85 million – State General Obligation Bonds - \$10 million in Priority 1 + \$75 million in Priority 5 • \$ 30 million – Coronavirus Response and Relief Supplement Act (CRRSA) – Federal legislation enacted in December 2020 • \$ 50 million – Louisiana Rescue Plan Fund (e.g., 2021 American Rescue Plan) – 2021 Appropriation through Act 485 • \$100 million – Louisiana Rescue Plan Fund (e.g., 2021 American Rescue Plan) – 2022 Appropriation through Act 117 • \$100 million – State General Fund – 2022 Appropriation through Act 167 • \$150 million – Infrastructure Investment and Jobs Act (IIJA) – 2022 discretionary grant award (\$600 million requested) • \$240 million – First six years of Vehicle Sales Tax – dedication through Act 486 (2021)/Act 505 (2022) • \$ 45 million – Transportation Trust Fund (Federal) – allocation from Highway Priority Program \$800 million – Total funding commitments for construction
Daniels, Jason	12/13/2022	Public Hearing Open Mic Comment (transcribed by court reporter)	My name is Jason Daniels. And I just wanted to say I agree with all the complainers that I don't feel that we need the toll because of the people that's, you know, going to Westlake and making under \$20,000 a year, \$22,000 a year. Plus things that I feel that – you know, that we can do something else with. But I'm just in agreement with everybody else as far as that and stuff like that.	Comment Responses A and C. Theme A: Opposition to tolls/concerns about funding and Theme C: Impacts on low-income persons	A: Without tolls, this project would not be financially feasible. LADOTD has been authorized by the legislature to move forward with a P3 for the first phase. The state will be responsible for the balance of the project from Ryan Street to I-10/I-210 East End. To date, \$800 million have been designated for the I-10 Calcasieu Bridge project. The sources of that amount are divided between state allocations of \$575 million, and direct federal funding of \$225 million. \$150 million of the federal funds were recently awarded through the Infrastructure Investment and Jobs Act (IIJA, aka the Bipartisan Infrastructure Law) Mega Grant Program. The first phase of the Calcasieu River Bridge Improvements Project (I-10/1-210 West End to Ryan Street) is estimated to cost \$1.5 billion, thus leaving a funding gap of \$700 million. That gap will be filled with private investment funds through a Private-Public Partnership (P3), which will complete the design, construct the project, and operate the facility over a 50-year period. The tolls collected will cover the P3 costs and pay the partners a return on their investment. An additional \$140 million has been committed from the State General Fund and the Highway Priority Program for right of way and other pre-construction costs. For more information, please see Section 3.16.16 of the DEIS as well as the Traffic and Revenue Analysis issued in 2021 as part of Appendix F (Preliminary Financial Feasibility Report) of the DEIS. C: Measures to address the impacts of tolling on low-income persons include the establishment of a local auto-rate toll that will not exceed \$2.88 per trip expressed in 2021 dollars. A more comprehensive explanation is included in the Draft EIS, specifically pages 3-15 to 3-20. Toll rates will escalate over time with inflation.
Darbone, Fitzgerald	12/13/2022	Public Hearing Comment (spoken directly to and transcribed by court reporter)	So my comment is on the toll. We are not happy with the toll because the toll will – we feel that [it] will kill North Lake Charles. Because once the toll goes from \$2, it's going to go to 3 to 4 to 5 to 6 to 7 to \$10. So if it's \$5, if I was driving I would take 210 not to pay \$5. So once that goes into effect, I feel that the majority of traffic will divert and take 210 and not I-10. And that is the traffic that we rely on in North Lake Charles to exit for Opelousas Street and Highway 171 to do business. Well, that traffic will not be diverted and will hurt our business in North Lake Charles.	Comment Responses A, C, D, and EE. Theme A: Opposition to tolls/concerns about funding, Theme C: Impacts on low-income persons, Theme D: Traffic Diversion, and Theme EE: Toll Rates	A: Without tolls, the I-10 Calcasieu River Bridge Improvements project would not be financially feasible. LADOTD has been authorized by the legislature to move forward with a P3 for the first phase. The state will be responsible for the balance of the project from Ryan Street to I-10/I-210 East End. To date, \$800 million have been designated for the I-10 Calcasieu River Bridge project. The sources of that amount are divided between state allocations of \$575 million, and direct federal funding of \$225 million. \$150 million of the federal funds were recently awarded through the Infrastructure Investment and Jobs Act (IIJA, aka the Bipartisan Infrastructure Law) Mega Grant Program. The first phase of the Calcasieu River Bridge Improvements Project (I-10/1-210 West End to Ryan Street) is estimated to cost \$1.5 billion, thus leaving a funding gap of \$700 million. That gap will be filled with private investment funds through a Private-Public Partnership (P3), which will complete the design, construct the project, and operate the facility over a 50-year period. The tolls collected will cover the P3 costs and pay the partners a return on their investment. An additional \$140 million has been committed from the State General Fund and the Highway Priority Program for right of way and other pre-construction costs. For more information, please see Section 3.16.16 of the DEIS as well as the Traffic and Revenue Analysis issued in 2021 as part of Appendix F (Preliminary Financial Feasibility Report) of the DEIS. C: Measures to address the impacts of tolling on low-income persons include the establishment of a local auto-rate toll that will not exceed \$2.88 per trip expressed in 2021 dollars. A more comprehensive explanation is included in the Draft EIS, specifically pages 3-15 to 3-20. Toll rates will escalate over time with inflation. D: Most of the traffic diverting would use I-210 to avoid the toll. These results are based on Alternative 5G and are preliminary and subject to change. The P3 will determine the toll rates and timing of tolls to minimize diversions from I-10 and maximize the revenue from tolls. A preliminary tolling traffic and revenue analysis provided in Appendix F of the Draft EIS determined that variable rate tolling, with lower rates in non-peak times, would cause a 26% diversion in 2032 and a 24% diversion in 2042. It is anticipated, however, that some diverting traffic will eventually return to the tolled route because of convenience and overall timesaving. EE: Actual toll rates will be established by the P3 concessionaire. Per the P3 Agreement, there will be no material increases to toll rates except for adjustments due to inflation.

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Darbone, Fitzgerald	12/13/2022	Public Hearing Comment (spoken directly to and transcribed by court reporter)	My name is Fitzgerald Darbone. I'm the president of the African-American Chamber of Commerce here in Lake Charles. My statement is also about the toll. If we toll this bridge starting \$2, that's in 2021. What happens in 2025, 2030 when the price of a toll goes up to 4, 5, 6, \$8? If I'm a person driving from Houston coming this way and I know that I have to pay \$5, I'm going to divert and take 210 and go around the bridge.	Comment Responses A, C, D, and EE. Theme A: Opposition to tolls/concerns about funding, Theme C: Impacts on low-income persons, Theme D: Traffic Diversion, and Theme EE: Toll Rates	A: Without tolls, the I-10 Calcasieu River Bridge Improvements project would not be financially feasible. LADOTD has been authorized by the legislature to move forward with a P3 for the first phase. The state will be responsible for the balance of the project from Ryan Street to I-10/I-210 East End. To date, \$800 million have been designated for the I-10 Calcasieu River Bridge project. The sources of that amount are divided between state allocations of \$575 million, and direct federal funding of \$225 million. \$150 million of the federal funds were recently awarded through the Infrastructure Investment and Jobs Act (IIJA, aka the Bipartisan Infrastructure Law) Mega Grant Program. The first phase of the Calcasieu River Bridge Improvements Project (I-10/1-210 West End to Ryan Street) is estimated to cost \$1.5 billion, thus leaving a funding gap of \$700 million. That gap will be filled with private investment funds through a Private-Public Partnership (P3), which will complete the design, construct the project, and operate the facility over a 50-year period. The tolls collected will cover the P3 costs and pay the partners a return on their investment. An additional \$140 million has been committed from the State General Fund and the Highway Priority Program for right of way and other pre-construction costs. C: Measures to address the impacts of tolling on low-income persons include the establishment of a local auto-rate toll that will not exceed \$2.88 per trip expressed in 2021 dollars. A more comprehensive explanation is included in the Draft EIS, specifically pages 3-15 to 3-20. Toll rates will escalate over time with inflation. D: Most of the traffic diverting would use I-210 to avoid the toll. These results are based on Alternative 5G and are preliminary and subject to change. The P3 will determine the toll rates and timing of tolls to minimize diversions from I-10 and maximize the revenue from tolls. A preliminary tolling traffic and revenue analysis provided in Appendix F of the Draft EIS determined that variable rate tolling, with lower rates in non-peak times, would cause a 26% diversion in 2032 and a 24% diversion in 2042. It is anticipated, however, that some diverting traffic will eventually return to the tolled route because of convenience and overall timesaving. EE: Actual toll rates will be established by the P3 concessionaire. Per the P3 Agreement, there will be no material increases to toll rates except for adjustments due to inflation.
Guidry, Marshall	12/14/2022	Email	I just read where there is not an option for a new Calcasieu river bridge without a toll. This is not acceptable. This is a main thoroughfare across the US, not some off beat path. We owe it to the people in the LC area as well as anyone else who travels I-10 to build this bridge and not charge a toll. Louisiana has plenty money right now with all of the federal recovery funds so now is the time to act.	Comment Responses A and F. Theme A: Opposition to tolls/concerns about funding, and Theme F: P3; Public fund allocation	A: Without tolls, this project would not be financially feasible. LADOTD has been authorized by the legislature to move forward with a P3 for the first phase. The state will be responsible for the balance of the project from Ryan Street to I-10/I-210 East End. To date, \$800 million have been designated for the I-10 Calcasieu Bridge project. The sources of that amount are divided between state allocations of \$575 million, and direct federal funding of \$225 million. \$150 million of the federal funds were recently awarded through the Infrastructure Investment and Jobs Act (IIJA, aka the Bipartisan Infrastructure Law) Mega Grant Program. The first phase of the Calcasieu River Bridge Improvements Project (I-10/1-210 West End to Ryan Street) is estimated to cost \$1.5 billion, thus leaving a funding gap of \$700 million. That gap will be filled with private investment funds through a Private-Public Partnership (P3), which will complete the design, construct the project, and operate the facility over a 50-year period. The tolls collected will cover the P3 costs and pay the partners a return on their investment. An additional \$140 million has been committed from the State General Fund and the Highway Priority Program for right of way and other pre-construction costs. For more information, please see Section 3.16.16 of the DEIS as well as the Traffic and Revenue Analysis issued in 2021 as part of Appendix F (Preliminary Financial Feasibility Report) of the DEIS. F: Funding Commitments and Sources for Construction of the I-10 Calcasieu River Bridge Improvements Project are listed below. <ul style="list-style-type: none"> • \$ 85 million – State General Obligation Bonds - \$10 million in Priority 1 + \$75 million in Priority 5 • \$ 30 million – Coronavirus Response and Relief Supplement Act (CRRSA) – Federal legislation enacted in December 2020 • \$ 50 million – Louisiana Rescue Plan Fund (e.g., 2021 American Rescue Plan) – 2021 Appropriation through Act 485 • \$100 million – Louisiana Rescue Plan Fund (e.g., 2021 American Rescue Plan) – 2022 Appropriation through Act 117 • \$100 million – State General Fund – 2022 Appropriation through Act 167 • \$150 million – Infrastructure Investment and Jobs Act (IIJA) – 2022 discretionary grant award (\$600 million requested) • \$240 million – First six years of Vehicle Sales Tax – dedication through Act 486 (2021)/Act 505 (2022) • \$ 45 million – Transportation Trust Fund (Federal) – allocation from Highway Priority Program \$800 million – Total funding commitments for construction.
Jones, Bryan Ray	12/14/2022	Email	No tolling on the Bridge! Tolling smells of backroom politics.	Comment Responses A and I. Theme A: Opposition to tolls/concerns about funding and Theme I: Tolling of interstate highways	A: Without tolls, this project would not be financially feasible. LADOTD has been authorized by the legislature to move forward with a P3 for the first phase. The state will be responsible for the balance of the project from Ryan Street to I-10/I-210 East End. To date, \$800 million have been designated for the I-10 Calcasieu Bridge project. The sources of that amount are divided between state allocations of \$575 million, and direct federal funding of \$225 million. \$150 million of the federal funds were recently awarded through the Infrastructure Investment and Jobs Act (IIJA, aka the Bipartisan Infrastructure Law) Mega Grant Program. The first phase of the Calcasieu River Bridge Improvements Project (I-10/1-210 West End to Ryan Street) is estimated to cost \$1.5 billion, thus leaving a funding gap of \$700 million. That gap will be filled with private investment funds through a Private-Public Partnership (P3), which will complete the design, construct the project, and operate the facility over a 50-year period. The tolls collected will cover the P3 costs and pay the partners a return on their investment. An additional \$140 million has been committed from the State General Fund and the Highway Priority Program for right of way and other pre-construction costs. For more information, please see Section 3.16.16 of the DEIS as well as the Traffic and Revenue Analysis issued in 2021 as part of Appendix F (Preliminary Financial Feasibility Report) of the DEIS. I: Under 23 U.S.C. 129(a)(1)(E), an existing toll-free bridge or tunnel may be converted into a toll facility as part of a project to reconstruct or replace the existing facility. This authority applies to bridges and tunnels that are located both on and off the Interstate Highway System. The prohibition on Interstate tolling applies to interstate highways (the roadway sections) but not interstate bridges.

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Miller, Tim	12/14/2022	Voicemail	Yes, this is Tim Miller in Lake Charles. I was reading in the paper about a proposed toll bridge. That's probably the worst thing our so-called leaders can come out with. I got a GED in the Navy; I'm not very well-educated, but even I know companies don't come to Louisiana now because of the high tax rates. For instance, Buc-ees, on and on and on. What is wrong with these people in Baton Rouge? I don't understand. Don't they know things are high and it's going to get higher?	Comment Responses A, C, and EE. Theme A: Opposition to tolls/concerns about funding, Theme C: Impacts on low-income persons, and Theme EE: Toll Rates	A: Without tolls, this project would not be financially feasible. LADOTD has been authorized by the legislature to move forward with a P3 for the first phase. The state will be responsible for the balance of the project from Ryan Street to I-10/I-210 East End. To date, \$800 million have been designated for the I-10 Calcasieu Bridge project. The sources of that amount are divided between state allocations of \$575 million, and direct federal funding of \$225 million. \$150 million of the federal funds were recently awarded through the Infrastructure Investment and Jobs Act (IIJA, aka the Bipartisan Infrastructure Law) Mega Grant Program. The first phase of the Calcasieu River Bridge Improvements Project (I-10/1-210 West End to Ryan Street) is estimated to cost \$1.5 billion, thus leaving a funding gap of \$700 million. That gap will be filled with private investment funds through a Private-Public Partnership (P3), which will complete the design, construct the project, and operate the facility over a 50-year period. The tolls collected will cover the P3 costs and pay the partners a return on their investment. An additional \$140 million has been committed from the State General Fund and the Highway Priority Program for right of way and other pre-construction costs. For more information, please see Section 3.16.16 of the DEIS as well as the Traffic and Revenue Analysis issued in 2021 as part of Appendix F (Preliminary Financial Feasibility Report) of the DEIS. C: Measures to address the impacts of tolling on low-income persons include the establishment of a local auto-rate toll that will not exceed \$2.88 per trip expressed in 2021 dollars. A more comprehensive explanation is included in the Draft EIS, specifically pages 3-15 to 3-20. Toll rates will escalate over time with inflation. EE: Actual toll rates will be established by the P3 concessionaire. Per the P3 Agreement, there will be no material increases to toll rates except for adjustments due to inflation.
Muhammad, Jayvon	12/13/2022	Public Hearing Comment (spoken directly to and transcribed by court reporter)	So I would like to voice concern about the toll on the bridge. My name is Jayvon Muhammad. And the toll and the private ownership is a challenge for me. I'm originally from San Francisco, recently moved here. And when I was a child the toll was 75 cents to cross the Bay Bridge. It's \$6 now. The Golden Gate Bridge is more. Most people cross two bridges, meaning that we pay \$10 or more to go to work. So I'm really concerned for the people here that are going to cross this bridge and the toll is going to continue to rise. I think we can't even determine how much because private people own it.	Comment Responses A, C, EE, and H. Theme A: Opposition to tolls/concerns about funding, Theme C: Impacts on low-income persons, Theme EE: Toll Rates, and Theme H: Authorization of Tolling	A: Without tolls, this project would not be financially feasible. LADOTD has been authorized by the legislature to move forward with a P3 for the first phase. The state will be responsible for the balance of the project from Ryan Street to I-10/I-210 East End. To date, \$800 million have been designated for the I-10 Calcasieu Bridge project. The sources of that amount are divided between state allocations of \$575 million, and direct federal funding of \$225 million. \$150 million of the federal funds were recently awarded through the Infrastructure Investment and Jobs Act (IIJA, aka the Bipartisan Infrastructure Law) Mega Grant Program. The first phase of the Calcasieu River Bridge Improvements Project (I-10/1-210 West End to Ryan Street) is estimated to cost \$1.5 billion, thus leaving a funding gap of \$700 million. That gap will be filled with private investment funds through a Private-Public Partnership (P3), which will complete the design, construct the project, and operate the facility over a 50-year period. The tolls collected will cover the P3 costs and pay the partners a return on their investment. An additional \$140 million has been committed from the State General Fund and the Highway Priority Program for right of way and other pre-construction costs. For more information, please see Section 3.16.16 of the DEIS as well as the Traffic and Revenue Analysis issued in 2021 as part of Appendix F (Preliminary Financial Feasibility Report) of the DEIS. C: Measures to address the impacts of tolling on low-income persons include the establishment of a local auto-rate toll that will not exceed \$2.88 per trip expressed in 2021 dollars. A more comprehensive explanation is included in the Draft EIS, specifically pages 3-15 to 3-20. Toll rates will escalate over time with inflation. EE: Actual toll rates will be established by the P3 concessionaire. Per the P3 Agreement, there will be no material increases to toll rates except for adjustments due to inflation. H: LADOTD has made the strategic decision to no longer own and operate toll facilities. LADOTD has been authorized by the Louisiana legislature to move forward with the P3 for the first phase of the project pursuant to Louisiana Revised Statutes (R.S.) § 48:250.4.A.(1), which states that if the Secretary determines it is in the best interest of Louisiana taxpayers, the LADOTD may solicit proposals and enter into contracts for P3 projects upon approval by the House and Senate Transportation, Highways, and Public Works Committees. The LADOTD shall comply with the provisions of R.S. 48:2084 through 48:2084.15 that are applicable to P3 projects of the Louisiana Transportation Authority and the provisions of Subpart C. Claims by Subcontractors, Suppliers, and Laborers (R.S. 48:256.3) and Claimant payments by the LADOTD (R.S. 48:256.5) to move forward with a P3 which includes tolling. LADOTD is following the legislative process required to achieve final approval.
Muhammad, Jayvon	12/13/2022	Public Hearing Open Mic Comment (transcribed by court reporter)	Hi. I commented over there, but I would like to comment again. My name is Jayvon Muhammad. I just want to acknowledge that the toll – my concern with the toll is that it'll not stay at \$2.88. I'm from San Francisco. When I was a child the toll was 75 cents. Today it is \$6. Most people cross two bridges and pay 10 to \$11. So I'm really concerned about the increases that will happen. Also, it's of the character a little bit to have a toll on both sides of the bridge. In other areas – in some other areas you pay going one way but you don't pay going the other way. So if toll has to happen, I think that should be a consideration.	Comment Responses A C, and EE. Theme A: Opposition to tolls/concerns about funding, Theme C: Impacts on low-income persons, and Theme EE: Toll Rates	A: Without tolls, this project would not be financially feasible. LADOTD has been authorized by the legislature to move forward with a P3 for the first phase. The state will be responsible for the balance of the project from Ryan Street to I-10/I-210 East End. To date, \$800 million have been designated for the I-10 Calcasieu Bridge project. The sources of that amount are divided between state allocations of \$575 million, and direct federal funding of \$225 million. \$150 million of the federal funds were recently awarded through the Infrastructure Investment and Jobs Act (IIJA, aka the Bipartisan Infrastructure Law) Mega Grant Program. The first phase of the Calcasieu River Bridge Improvements Project (I-10/1-210 West End to Ryan Street) is estimated to cost \$1.5 billion, thus leaving a funding gap of \$700 million. That gap will be filled with private investment funds through a Private-Public Partnership (P3), which will complete the design, construct the project, and operate the facility over a 50-year period. The tolls collected will cover the P3 costs and pay the partners a return on their investment. An additional \$140 million has been committed from the State General Fund and the Highway Priority Program for right of way and other pre-construction costs. For more information, please see Section 3.16.16 of the DEIS as well as the Traffic and Revenue Analysis issued in 2021 as part of Appendix F (Preliminary Financial Feasibility Report) of the DEIS. C: Measures to address the impacts of tolling on low-income persons include the establishment of a local auto-rate toll that will not exceed \$2.88 per trip expressed in 2021 dollars. A more comprehensive explanation is included in the Draft EIS, specifically pages 3-15 to 3-20. Toll rates will escalate over time with inflation. EE: Actual toll rates will be established by the P3 concessionaire. Per the P3 Agreement, there will be no material increases to toll rates except for adjustments due to inflation.

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Name (Last / First)	Date	Source	Comment(s)	Response ID and Theme	Response
Norup, Jonathan	12/15/2022	Email	<p>With all that the people of The Great State of LOUISIANA have been through in the last several years do you think we need to worry about buying a transponder and putting money on it to cross a bridge????? Look at the impact this toll would have on other local roads. I as a licensed commercial driver I AVOID TOLL ROADS AS MUCH AS POSSIBLE!!! By placing this toll on the bridge you are putting the motoring public at risk to drivers who Don't have any idea of the road traffic in this general area. As it is we have had way to many large closures on Interstate 10 from big wrecks. Can you honestly tell a father - mother - aunt or uncle that there (sic) loved ones won't be coming home anymore?? Please reconsider this forced toll to cross the bridge and use another way to oay (sic) for it. Our future greatly DEPENDS on it. Thanks for your time and consideration of my message</p>	<p>Comment Responses A, B, C, and D. Theme A: Opposition to tolls/concerns about funding, Theme B: Impacts on freight, Theme C: Impacts on low-income persons, and Theme D: Traffic Diversion</p>	<p>A: Without tolls, this project would not be financially feasible. LADOTD has been authorized by the legislature to move forward with a P3 for the first phase. The state will be responsible for the balance of the project from Ryan Street to I-10/I-210 East End. To date, \$800 million have been designated for the I-10 Calcasieu Bridge project. The sources of that amount are divided between state allocations of \$575 million, and direct federal funding of \$225 million. \$150 million of the federal funds were recently awarded through the Infrastructure Investment and Jobs Act (IIJA, aka the Bipartisan Infrastructure Law) Mega Grant Program. The first phase of the Calcasieu River Bridge Improvements Project (I-10/1-210 West End to Ryan Street) is estimated to cost \$1.5 billion, thus leaving a funding gap of \$700 million. That gap will be filled with private investment funds through a Private-Public Partnership (P3), which will complete the design, construct the project, and operate the facility over a 50-year period. The tolls collected will cover the P3 costs and pay the partners a return on their investment. An additional \$140 million has been committed from the State General Fund and the Highway Priority Program for right of way and other pre-construction costs. For more information, please see Section 3.16.16 of the DEIS as well as the Traffic and Revenue Analysis issued in 2021 as part of Appendix F (Preliminary Financial Feasibility Report) of the DEIS. B: The P3 agreement will contain controls that ensure that tolling will not unduly burden any single mode of transportation, including freight. These controls will be drawn from national tolling norms and practices. C: Measures to address the impacts of tolling on low-income persons include the establishment of a local auto-rate toll that will not exceed \$2.88 per trip expressed in 2021 dollars. A more comprehensive explanation is included in the Draft EIS, specifically pages 3-15 to 3-20. Toll rates will escalate over time with inflation. D: Most of the traffic diverting would use I-210 to avoid the toll. These results are based on Alternative 5G and are preliminary and subject to change. The P3 will determine the toll rates and timing of tolls to minimize diversions from I-10 and maximize the revenue from tolls. A preliminary tolling traffic and revenue analysis provided in Appendix F of the Draft EIS determined that variable rate tolling, with lower rates in non-peak times, would cause a 26% diversion in 2032 and a 24% diversion in 2042. It is anticipated, however, that some diverting traffic will eventually return to the tolled route because of convenience and overall timesaving.</p>
Fry, Eric	12/22/2022	Website	<p>Also, by my calculations, the P3 operator will generate revenue of between \$50-60 million dollars a year. That's a lot of money going to a private company, and more specifically NOT going to the public coffers (which badly needs that money). Will it really cost that much money to pay the financing on this project and operate it going forward (with due allowance for profit)? I like the idea of tolling the bridge, but I cannot understand why it needs to be done in a way that siphons that revenue off to a private entity?</p>	<p>Comment Responses A and F. Theme A: Opposition to tolls/concerns about funding, and Theme F: P3; Public fund allocation</p>	<p>A: Without tolls, this project would not be financially feasible. LADOTD has been authorized by the legislature to move forward with a P3 for the first phase. The state will be responsible for the balance of the project from Ryan Street to I-10/I-210 East End. To date, \$800 million have been designated for the I-10 Calcasieu Bridge project. The sources of that amount are divided between state allocations of \$575 million, and direct federal funding of \$225 million. \$150 million of the federal funds were recently awarded through the Infrastructure Investment and Jobs Act (IIJA, aka the Bipartisan Infrastructure Law) Mega Grant Program. The first phase of the Calcasieu River Bridge Improvements Project (I-10/1-210 West End to Ryan Street) is estimated to cost \$1.5 billion, thus leaving a funding gap of \$700 million. That gap will be filled with private investment funds through a Private-Public Partnership (P3), which will complete the design, construct the project, and operate the facility over a 50-year period. The tolls collected will cover the P3 costs and pay the partners a return on their investment. An additional \$140 million has been committed from the State General Fund and the Highway Priority Program for right of way and other pre-construction costs. For more information, please see Section 3.16.16 of the DEIS as well as the Traffic and Revenue Analysis issued in 2021 as part of Appendix F (Preliminary Financial Feasibility Report) of the DEIS. F: Funding Commitments and Sources for Construction of the I-10 Calcasieu River Bridge Improvements Project are listed below:</p> <ul style="list-style-type: none"> • \$ 85 million – State General Obligation Bonds - \$10 million in Priority 1 + \$75 million in Priority 5 • \$ 30 million – Coronavirus Response and Relief Supplement Act (CRRSA) – Federal legislation enacted in December 2020 • \$ 50 million – Louisiana Rescue Plan Fund (e.g., 2021 American Rescue Plan) – 2021 Appropriation through Act 485 • \$100 million – Louisiana Rescue Plan Fund (e.g., 2021 American Rescue Plan) – 2022 Appropriation through Act 117 • \$100 million – State General Fund – 2022 Appropriation through Act 167 • \$150 million – Infrastructure Investment and Jobs Act (IIJA) – 2022 discretionary grant award (\$600 million requested) • \$240 million – First six years of Vehicle Sales Tax – dedication through Act 486 (2021)/Act 505 (2022) • \$ 45 million – Transportation Trust Fund (Federal) – allocation from Highway Priority Program <p>\$800 million – Total funding commitments for construction.</p>

Comments Received During the 45-day Comment Period After the NOA of the DEIS and Comment Responses

Name (Last / First)	Date	Source	Comment(s)	Response ID and Theme	Response
Pennartz, Chris	12/13/2022	Public Hearing Open Mic Comment (transcribed by court reporter)	<p>My name is Chris Pennartz, P-E-N-N-A-R-T-Z.</p> <p>I have a question. I pay enough taxes as it is right now. And I feel that the toll is just, you know, it's too much I think for us. I don't think anybody in this town or in this state or anywhere wants to pay any more tolls. You know, I mean, our taxes keep going up every year. And we don't know where the money is being spent. I don't know if it's just, you know, no transparency. I think that they could find the money to, you know, build this bridge without having to charge a toll. Because, I mean, I know I pay way more in taxes. They come around and reappraise my house every so many years and the appraisal goes up and I have to pay more taxes on that appraisal. And, I mean, I don't know where our money's going.</p>	<p>Comment Responses A, F, and EE. Theme A: Opposition to tolls/concerns about funding, Theme F: P3; Public fund allocation, and Theme EE: Toll Rates</p>	<p>A: Without tolls, this project would not be financially feasible. LADOTD has been authorized by the legislature to move forward with a P3 for the first phase. The state will be responsible for the balance of the project from Ryan Street to I-10/I-210 East End. To date, \$800 million have been designated for the I-10 Calcasieu Bridge project. The sources of that amount are divided between state allocations of \$575 million, and direct federal funding of \$225 million. \$150 million of the federal funds were recently awarded through the Infrastructure Investment and Jobs Act (IIJA, aka the Bipartisan Infrastructure Law) Mega Grant Program. The first phase of the Calcasieu River Bridge Improvements Project (I-10/1-210 West End to Ryan Street) is estimated to cost \$1.5 billion, thus leaving a funding gap of \$700 million. That gap will be filled with private investment funds through a Private-Public Partnership (P3), which will complete the design, construct the project, and operate the facility over a 50-year period. The tolls collected will cover the P3 costs and pay the partners a return on their investment. An additional \$140 million has been committed from the State General Fund and the Highway Priority Program for right of way and other pre-construction costs. For more information, please see Section 3.16.16 of the DEIS as well as the Traffic and Revenue Analysis issued in 2021 as part of Appendix F (Preliminary Financial Feasibility Report) of the DEIS.</p> <p>F: Funding Commitments and Sources for Construction of the I-10 Calcasieu River Bridge Improvements Project are listed below: • \$85 million – State General Obligation Bonds - \$10 million in Priority 1 + \$75 million in Priority 5</p> <ul style="list-style-type: none"> • \$ 30 million – Coronavirus Response and Relief Supplement Act (CRRSA) – Federal legislation enacted in December 2020 • \$ 50 million – Louisiana Rescue Plan Fund (e.g., 2021 American Rescue Plan) – 2021 Appropriation through Act 485 • \$100 million – Louisiana Rescue Plan Fund (e.g., 2021 American Rescue Plan) – 2022 Appropriation through Act 117 • \$100 million – State General Fund – 2022 Appropriation through Act 167 • \$150 million – Infrastructure Investment and Jobs Act (IIJA) – 2022 discretionary grant award (\$600 million requested) • \$240 million – First six years of Vehicle Sales Tax – dedication through Act 486 (2021)/Act 505 (2022) • \$ 45 million – Transportation Trust Fund (Federal) – allocation from Highway Priority Program <p>\$800 million – Total funding commitments for construction. EE: Actual toll rates will be established by the P3 concessionaire. Per the P3 Agreement, there will be no material increases to toll rates except for adjustments due to inflation.</p>
Pickles, Comrade	1/2/2023	Email	<p>I seriously will put an additional 50 miles on my car to go around your bridge if you institute a toll. How stupid can you people be? Truly. I'm not trying to insult you, I'm genuinely astounded.</p>	<p>Comment Responses A and D. Theme A: Opposition to tolls/concerns about funding and Theme D: Traffic Diversion</p>	<p>A: Without tolls, this project would not be financially feasible. LADOTD has been authorized by the legislature to move forward with a P3 for the first phase. The state will be responsible for the balance of the project from Ryan Street to I-10/I-210 East End. To date, \$800 million have been designated for the I-10 Calcasieu Bridge project. The sources of that amount are divided between state allocations of \$575 million, and direct federal funding of \$225 million. \$150 million of the federal funds were recently awarded through the Infrastructure Investment and Jobs Act (IIJA, aka the Bipartisan Infrastructure Law) Mega Grant Program. The first phase of the Calcasieu River Bridge Improvements Project (I-10/1-210 West End to Ryan Street) is estimated to cost \$1.5 billion leaving a funding gap of \$700 million. That gap will be filled with private investment funds through a Private-Public Partnership (P3), which will complete the design, construct the project, and operate the facility over a 50-year period. The tolls collected will cover the P3 costs and pay the partners a return on their investment. An additional \$140 million has been committed from the State General Fund and the Highway Priority Program for right of way and other pre-construction costs. For more information, please see Section 3.16.16 of the DEIS as well as the Traffic and Revenue Analysis issued in 2021 as part of Appendix F (Preliminary Financial Feasibility Report) of the DEIS.</p> <p>D: Most of the traffic diverting would use I-210 to avoid the toll. These results are based on Alternative 5G and are preliminary and subject to change. The P3 will determine the toll rates and timing of tolls to minimize diversions from I-10 and maximize the revenue from tolls. A preliminary tolling traffic and revenue analysis provided in Appendix F of the Draft EIS determined that variable rate tolling, with lower rates in non-peak times, would cause a 26% diversion in 2032 and a 24% diversion in 2042. It is anticipated, however, that some diverting traffic will eventually return to the tolled route because of convenience and overall timesaving.</p>

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Simmons, Gordon D.	12/13/2022	Public Hearing Comment (spoken directly to and transcribed by court reporter)	Okay. First, I would like to make a comment. This toll bridge is obviously against everybody's wishes and all the public input that was given years ago. And it's wrong to let a private company make money off of people having to cross a bridge every day going back and forth to work. And it's going to cause major traffic problems on 210 and 171.	Comment Responses A, D, F, and H. Theme A: Opposition to tolls/concerns about funding, Theme D: Traffic Diversion, Theme F: P3; Public fund allocation, and Theme H: Authorization of Tolling	<p>A: Without tolls, this project would not be financially feasible. LADOTD has been authorized by the legislature to move forward with a P3 for the first phase. The state will be responsible for the balance of the project from Ryan Street to I-10/I-210 East End. To date, \$800 million have been designated for the I-10 Calcasieu Bridge project. The sources of that amount are divided between state allocations of \$575 million, and direct federal funding of \$225 million. \$150 million of the federal funds were recently awarded through the Infrastructure Investment and Jobs Act (IIJA, aka the Bipartisan Infrastructure Law) Mega Grant Program. The first phase of the Calcasieu River Bridge Improvements Project (I-10/I-210 West End to Ryan Street) is estimated to cost \$1.5 billion, thus leaving a funding gap of \$700 million. That gap will be filled with private investment funds through a Private-Public Partnership (P3), which will complete the design, construct the project, and operate the facility over a 50-year period. The tolls collected will cover the P3 costs and pay the partners a return on their investment. An additional \$140 million has been committed from the State General Fund and the Highway Priority Program for right of way and other pre-construction costs. For more information, please see Section 3.16.16 of the DEIS as well as the Traffic and Revenue Analysis issued in 2021 as part of Appendix F (Preliminary Financial Feasibility Report) of the DEIS.</p> <p>D: Most of the traffic diverting would use I-210 to avoid the toll. These results are based on Alternative 5G and are preliminary and subject to change. The P3 will determine the toll rates and timing of tolls to minimize diversions from I-10 and maximize the revenue from tolls. A preliminary tolling traffic and revenue analysis provided in Appendix F of the Draft EIS determined that variable rate tolling, with lower rates in non-peak times, would cause a 26% diversion in 2032 and a 24% diversion in 2042. It is anticipated, however, that some diverting traffic will eventually return to the tolled route because of convenience and overall timesaving. F: Funding Commitments and Sources for Construction of the I-10 Calcasieu River Bridge Improvements Project are listed below:</p> <ul style="list-style-type: none"> • \$ 85 million – State General Obligation Bonds - \$10 million in Priority 1 + \$75 million in Priority 5 • \$ 30 million – Coronavirus Response and Relief Supplement Act (CRRSA) – Federal legislation enacted in December 2020 • \$ 50 million – Louisiana Rescue Plan Fund (e.g., 2021 American Rescue Plan) – 2021 Appropriation through Act 485 • \$100 million – Louisiana Rescue Plan Fund (e.g., 2021 American Rescue Plan) – 2022 Appropriation through Act 117 • \$100 million – State General Fund – 2022 Appropriation through Act 167 • \$150 million – Infrastructure Investment and Jobs Act (IIJA) – 2022 discretionary grant award (\$600 million requested) • \$240 million – First six years of Vehicle Sales Tax – dedication through Act 486 (2021)/Act 505 (2022) • \$ 45 million – Transportation Trust Fund (Federal) – allocation from Highway Priority Program <p>\$800 million – Total funding commitments for construction. H: LADOTD has been authorized by the Louisiana legislature pursuant to Louisiana Revised Statutes (R.S.) § 48:250.4.A.(1), which states that if the Secretary determines it is in the best interest of Louisiana taxpayers, the LADOTD may solicit proposals and enter into contracts for P3 projects upon approval by the House and Senate Transportation, Highways, and Public Works Committees. The LADOTD shall comply with the provisions of R.S. 48:2084 through 48:2084.15 that are applicable to P3 projects of the Louisiana Transportation Authority and the provisions of Subpart C. Claims by Subcontractors, Suppliers, and Laborers (R.S. 48:256.3) and Claimant payments by the LADOTD (R.S. 48:256.5). to move forward with a P3 which includes tolling. LADOTD is following the legislative process required to achieve final approval.</p>
Darbone, Fitzgerald	12/13/2022	Public Hearing Open Mic Comment (transcribed by court reporter)	What that's going to do if we start getting traffic going around Lake Charles, what happens to the North Lake Charles traffic that normally would have got this traffic coming that way? Your 171. Your Opelousas Street. Those businesses that rely on that traffic now will start losing traffic to 210. So that will create a problem for that area as far as businesses and traffic. So that is my concern.	Comment Response D. Theme D: Traffic Diversion	<p>D: Most of the traffic diverting would use I-210 to avoid the toll. These results are based on Alternative 5G and are preliminary and subject to change. The Public-Private Partnership will determine the toll rates and timing of tolls to minimize diversions from I-10 and maximize the revenue from tolls. A preliminary tolling traffic and revenue analysis provided in Appendix F of the Draft EIS determined that variable rate tolling, with lower rates in non-peak times, would cause a 26% diversion in 2032 and a 24% diversion in 2042. It is anticipated, however, that some diverting traffic will eventually return to the tolled route because of convenience and overall timesaving.</p>
Fry, Eric	12/13/2022	Public Hearing Open Mic Comment (transcribed by court reporter)	My name is Eric Fry. I'm the president of Alpha Phi Alpha Fraternity, Incorporated here in Lake Charles, a community service organization. And I'm just wondering, if there is a toll and a diversion – would that be a diversion to 210, right? The ones that don't want to pay a toll. So if there was a toll and there was a diversion to 210, I was wondering if 210 was designed for that diversion of traffic that it is going to – would take once there's a toll and somebody tried to avoid the toll and go to 210. So would diversion handle the capacity that's going to go to 210?	Comment Response D. Theme D: Traffic Diversion	<p>D: Most of the traffic diverting would use I-210 to avoid the toll. These results are based on Alternative 5G and are preliminary and subject to change. The Public-Private Partnership will determine the toll rates and timing of tolls to minimize diversions from I-10 and maximize the revenue from tolls. A preliminary tolling traffic and revenue analysis provided in Appendix F of the Draft EIS determined that variable rate tolling, with lower rates in non-peak times, would cause a 26% diversion in 2032 and a 24% diversion in 2042. It is anticipated, however, that some diverting traffic will eventually return to the tolled route because of convenience and overall timesaving.</p>
Hay, Patrick	12/13/2022	Public Hearing Open Mic Comment (transcribed by court reporter)	My name is Patrick Hay. I represent Hay Brothers, Incorporated. We are a trucking and crane company here in Lake Charles. And I would just like to make a statement that this will be a financial impact on my company. We cross that bridge anywhere from once a day to sometimes 20 to 30 times a day. And I feel that any bridge that should be build (sic) on an existing highway should not be tolled. If you want to make a new highway, go ahead and toll it. But I think I've already paid for this one. I paid enough fuel taxes already and final use tax. I do not think this is a fair solution to tax those of us who have already paid for it once. Thank you.	Comment Responses A and B. Theme A: Opposition to tolls/concerns about funding and Theme B: Impacts on freight	<p>A: Without tolls, this project would not be financially feasible. LADOTD has been authorized by the legislature to move forward with a P3 for the first phase. The state will be responsible for the balance of the project from Ryan Street to I-10/I-210 East End. To date, \$800 million have been designated for the I-10 Calcasieu Bridge project. The sources of that amount are divided between state allocations of \$575 million, and direct federal funding of \$225 million. \$150 million of the federal funds were recently awarded through the Infrastructure Investment and Jobs Act (IIJA, aka the Bipartisan Infrastructure Law) Mega Grant Program. The first phase of the Calcasieu River Bridge Improvements Project (I-10/I-210 West End to Ryan Street) is estimated to cost \$1.5 billion, thus leaving a funding gap of \$700 million. That gap will be filled with private investment funds through a Private-Public Partnership (P3), which will complete the design, construct the project, and operate the facility over a 50-year period. The tolls collected will cover the P3 costs and pay the partners a return on their investment. An additional \$140 million has been committed from the State General Fund and the Highway Priority Program for right of way and other pre-construction costs. For more information, please see Section 3.16.16 of the DEIS as well as the Traffic and Revenue Analysis issued in 2021 as part of Appendix F (Preliminary Financial Feasibility Report) of the DEIS. B: The P3 agreement will contain controls that ensure that tolling will not unduly burden any single mode of transportation, including freight. These controls will be drawn from national tolling norms and practices.</p>

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Name (Last / First)	Date	Source	Comment(s)	Response ID and Theme	Response
Nelson, Brad	12/13/2022	Public Hearing Open Mic Comment (transcribed by court reporter)	<p>Good evening. I'm Brad Nelson with Freeman Trucking business here in Lake Charles. Tank truck carrier that services the plants on the west side. And my business is in the Lake Charles area. I'm also representing the Louisiana Motor Transport Association. I'm the second vice president, and the directors asked me to speak on their behalf. And also I'm on the highway policy committee for the American Trucking Association. So I have some concerns about this too. First for my company, just like Pat Hayes said, it's going to be a big burden. I choose to be in Lake Charles. Most of my competitors are on the other side of the bridge where the plants are. So they're going to have a competitive advantage where I'm paying a toll and they're not. I'm going to have to go over the bridge no matter what. So for the LMTA, I just want to say there's 90,000 transport jobs in Louisiana. We're being hit with a lot of increase[d] cost of insurance, lawsuits, fuel taxes, fuel prices. This is all going to be a burden on us. So this is going to be another burden. And also it's going to be a burden on all the truckers in the area and through the whole United States. And this is going to increase their prices to transport goods throughout the United States.</p>	<p>Comment Responses A and B. Theme A: Opposition to tolls/concerns about funding and Theme B: Impacts on freight</p>	<p>A: Without tolls, this project would not be financially feasible. LADOTD has been authorized by the legislature to move forward with a P3 for the first phase. The state will be responsible for the balance of the project from Ryan Street to I-10/I-210 East End. To date, \$800 million have been designated for the I-10 Calcasieu Bridge project. The sources of that amount are divided between state allocations of \$575 million, and direct federal funding of \$225 million. \$150 million of the federal funds were recently awarded through the Infrastructure Investment and Jobs Act (IIJA, aka the Bipartisan Infrastructure Law) Mega Grant Program. The first phase of the Calcasieu River Bridge Improvements Project (I-10/1-210 West End to Ryan Street) is estimated to cost \$1.5 billion, thus leaving a funding gap of \$700 million. That gap will be filled with private investment funds through a Private-Public Partnership (P3), which will complete the design, construct the project, and operate the facility over a 50-year period. The tolls collected will cover the P3 costs and pay the partners a return on their investment. An additional \$140 million has been committed from the State General Fund and the Highway Priority Program for right of way and other pre-construction costs. For more information, please see Section 3.16.16 of the DEIS as well as the Traffic and Revenue Analysis issued in 2021 as part of Appendix F (Preliminary Financial Feasibility Report) of the DEIS. B: The P3 agreement will contain controls that ensure that tolling will not unduly burden any single mode of transportation, including freight. These controls will be drawn from national tolling norms and practices.</p>
Gentry, Danny	12/14/2022	Email	<p>I-10 is a federal highway. The Biden (sic) infrastructure bill should cover it? Not paying for any more.</p>	<p>Comment Responses A, E, and F. Theme A: Opposition to tolls/concerns about funding, Theme E: Federal participation in project, and Theme F: P3; Public fund allocation</p>	<p>A: Without tolls, this project would not be financially feasible. LADOTD has been authorized by the legislature to move forward with a P3 for the first phase. The state will be responsible for the balance of the project from Ryan Street to I-10/I-210 East End. To date, \$800 million have been designated for the I-10 Calcasieu Bridge project. The sources of that amount are divided between state allocations of \$575 million, and direct federal funding of \$225 million. \$150 million of the federal funds were recently awarded through the Infrastructure Investment and Jobs Act (IIJA, aka the Bipartisan Infrastructure Law) Mega Grant Program. The first phase of the Calcasieu River Bridge Improvements Project (I-10/1-210 West End to Ryan Street) is estimated to cost \$1.5 billion, thus leaving a funding gap of \$700 million. That gap will be filled with private investment funds through a Private-Public Partnership (P3), which will complete the design, construct the project, and operate the facility over a 50-year period. The tolls collected will cover the P3 costs and pay the partners a return on their investment. An additional \$140 million has been committed from the State General Fund and the Highway Priority Program for right of way and other pre-construction costs. For more information, please see Section 3.16.16 of the DEIS as well as the Traffic and Revenue Analysis issued in 2021 as part of Appendix F (Preliminary Financial Feasibility Report) of the DEIS. E: LADOTD submitted a \$600 million federal grant application and was awarded \$150 million from the MEGA program in 2022. Another \$75 million in federal funds has also been allocated to this project. The balance of \$1.5 billion in funding will come from a combination of state funds and toll revenue. F: Funding Commitments and Sources for Construction of the I-10 Calcasieu River Bridge Improvements Project are listed below:</p> <ul style="list-style-type: none"> • \$ 85 million – State General Obligation Bonds - \$10 million in Priority 1 + \$75 million in Priority 5 • \$ 30 million – Coronavirus Response and Relief Supplement Act (CRRSA) – Federal legislation enacted in December 2020 • \$ 50 million – Louisiana Rescue Plan Fund (e.g., 2021 American Rescue Plan) – 2021 Appropriation through Act 485 • \$100 million – Louisiana Rescue Plan Fund (e.g., 2021 American Rescue Plan) – 2022 Appropriation through Act 117 • \$100 million – State General Fund – 2022 Appropriation through Act 167 • \$150 million – Infrastructure Investment and Jobs Act (IIJA) – 2022 discretionary grant award (\$600 million requested) • \$240 million – First six years of Vehicle Sales Tax – dedication through Act 486 (2021)/Act 505 (2022) • \$ 45 million – Transportation Trust Fund (Federal) – allocation from Highway Priority Program <p>\$800 million – Total funding commitments for construction</p>

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Jones, Bryan Ray	12/14/2022	Email	Interstate 10 is part of the National Highway system. We have been paying taxes to maintain this system at the pump. There are funds available, use them. The I-10 bridge is not a special project of the parish or state, it is part of the major free access for the nation.	Comment Responses A, E, F, and I. Theme A: Opposition to tolls/concerns about funding, Theme E: Federal participation in project, Theme F: P3; Public fund allocation, and Theme I: Tolling of Interstate Highways	<p>A: Without tolls, this project would not be financially feasible. LADOTD has been authorized by the legislature to move forward with a P3 for the first phase. The state will be responsible for the balance of the project from Ryan Street to I-10/I-210 East End. To date, \$800 million have been designated for the I-10 Calcasieu Bridge project. The sources of that amount are divided between state allocations of \$575 million, and direct federal funding of \$225 million. \$150 million of the federal funds were recently awarded through the Infrastructure Investment and Jobs Act (IIJA, aka the Bipartisan Infrastructure Law) Mega Grant Program. The first phase of the Calcasieu River Bridge Improvements Project (I-10/1-210 West End to Ryan Street) is estimated to cost \$1.5 billion, thus leaving a funding gap of \$700 million. That gap will be filled with private investment funds through a Private-Public Partnership (P3), which will complete the design, construct the project, and operate the facility over a 50-year period. The tolls collected will cover the P3 costs and pay the partners a return on their investment. An additional \$140 million has been committed from the State General Fund and the Highway Priority Program for right of way and other pre-construction costs. For more information, please see Section 3.16.16 of the DEIS as well as the Traffic and Revenue Analysis issued in 2021 as part of Appendix F (Preliminary Financial Feasibility Report) of the DEIS. E: LADOTD submitted a \$600 million federal grant application and was awarded \$150 million from the MEGA program in 2022. Another \$75 million in federal funds has also been allocated to this project. The balance of \$1.5 billion in funding will come from a combination of state funds and toll revenue. F: Funding Commitments and Sources for Construction of the I-10 Calcasieu River Bridge Improvements Project are listed below: • \$ 85 million – State General Obligation Bonds - \$10 million in Priority 1 + \$75 million in Priority 5</p> <ul style="list-style-type: none"> • \$ 30 million – Coronavirus Response and Relief Supplement Act (CRRSA) – Federal legislation enacted in December 2020; • \$ 50 million – Louisiana Rescue Plan Fund (e.g., 2021 American Rescue Plan) – 2021 Appropriation through Act 485; • \$100 million – Louisiana Rescue Plan Fund (e.g., 2021 American Rescue Plan) – 2022 Appropriation through Act 117; • \$100 million – State General Fund – 2022 Appropriation through Act 167 • \$150 million – Infrastructure Investment and Jobs Act (IIJA) – 2022 discretionary grant award (\$600 million requested) • \$240 million – First six years of Vehicle Sales Tax – dedication through Act 486 (2021)/Act 505 (2022) • \$ 45 million – Transportation Trust Fund (Federal) – allocation from Highway Priority Program <p>\$800 million – Total funding commitments for construction. I: Under 23 U.S.C. 129(a)(1)(E), an existing toll-free bridge or tunnel may be converted into a toll facility as part of a project to reconstruct or replace the existing facility. This authority applies to bridges and tunnels that are located both on and off the Interstate Highway System. The prohibition on Interstate tolling applies to interstate highways (the roadway sections) but not interstate bridges.</p>
Nelson, Brad	12/13/2022	Public Hearing Open Mic Comment (transcribed by court reporter)	Also I would like to say that last week the LMT was in Washington. And I sat down with Clay Higgins, and we asked him about the bridge. And he just let us know that as far as they know, the state has not requested any funding for the bridge. He offered it and said he would do everything to get a hundred percent funding. So the question is why aren't we going after federal dollars for this bridge? I think everybody in Lake Charles or at least in this area should be concerned about that. Thank you.	Comment Responses A, E, and F. Theme A: Opposition to tolls/concerns about funding, Theme E: Federal participation in project, and Theme F: P3; Public fund allocation	<p>A: Without tolls, this project would not be financially feasible. LADOTD has been authorized by the legislature to move forward with a P3 for the first phase. The state will be responsible for the balance of the project from Ryan Street to I-10/I-210 East End. To date, \$800 million have been designated for the I-10 Calcasieu Bridge project. The sources of that amount are divided between state allocations of \$575 million, and direct federal funding of \$225 million. \$150 million of the federal funds were recently awarded through the Infrastructure Investment and Jobs Act (IIJA, aka the Bipartisan Infrastructure Law) Mega Grant Program. The first phase of the Calcasieu River Bridge Improvements Project (I-10/1-210 West End to Ryan Street) is estimated to cost \$1.5 billion, thus leaving a funding gap of \$700 million. That gap will be filled with private investment funds through a Private-Public Partnership (P3), which will complete the design, construct the project, and operate the facility over a 50-year period. The tolls collected will cover the P3 costs and pay the partners a return on their investment. An additional \$140 million has been committed from the State General Fund and the Highway Priority Program for right of way and other pre-construction costs. For more information, please see Section 3.16.16 of the DEIS as well as the Traffic and Revenue Analysis issued in 2021 as part of Appendix F (Preliminary Financial Feasibility Report) of the DEIS. E: LADOTD submitted a \$600 million federal grant application and was awarded \$150 million from the MEGA program in 2022. Another \$75 million in federal funds has also been allocated to this project. The balance of \$1.5 billion in funding will come from a combination of state funds and toll revenue. F: Funding Commitments and Sources for Construction of the I-10 Calcasieu River Bridge Improvements Project are listed below:</p> <ul style="list-style-type: none"> • \$ 85 million – State General Obligation Bonds - \$10 million in Priority 1 + \$75 million in Priority 5 • \$ 30 million – Coronavirus Response and Relief Supplement Act (CRRSA) – Federal legislation enacted in December 2020 • \$ 50 million – Louisiana Rescue Plan Fund (e.g., 2021 American Rescue Plan) – 2021 Appropriation through Act 485 • \$100 million – Louisiana Rescue Plan Fund (e.g., 2021 American Rescue Plan) – 2022 Appropriation through Act 117 • \$100 million – State General Fund – 2022 Appropriation through Act 167 • \$150 million – Infrastructure Investment and Jobs Act (IIJA) – 2022 discretionary grant award (\$600 million requested) • \$240 million – First six years of Vehicle Sales Tax – dedication through Act 486 (2021)/Act 505 (2022) • \$ 45 million – Transportation Trust Fund (Federal) – allocation from Highway Priority Program <p>\$800 million – Total funding commitments for construction</p>

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Tarver, Phillip	12/13/2022	Public Hearing Open Mic Comment (transcribed by court reporter)	So I appreciate the opportunity to address the crowd tonight. My name is Phillip Tarver. I'm the state representative from South Lake Charles. I wanted to come and just bring out one burning point of question that is important to this community. And that is the full disclosure and transparency as we all hear those terms. We understand the effective number that has been used for the cost of the bridge is \$1.5 billion. That's the number that we've been discussing. And in our legislative delegation, we worked very hard this past session to find funding for this bridge. We managed to appropriate or allocate or whatever the correct legal term is about a billion dollars of state dollars. That is citizen dollars, sales tax revenue in surplus money. Approximately a billion dollars. Very little federal money. There was a little bit of ARP money, about 40 or 50 million. I forget the exact number. But when you look at it, we put forth our own tax dollars, a billion dollars on an interstate highway bridge. And we don't understand why we have not been able to capture any federal dollars. And none of this big infrastructure jobs act money, no grants, all of those things. And we've been told a lot of different things. But I want the public to know from our standpoint and our legislative delegation, we worked very hard to allocate \$1 billion of their hard-earned money towards that bridge. And we are asking LADOTD and the governor and the ones that are responsible from there forth to take a way a finding the other 500 million necessary to build this bridge. Thank you.	Comment Responses A and F. Theme A: Opposition to tolls/concerns about funding and Theme F: P3; Public fund allocation	A: Without tolls, this project would not be financially feasible. LADOTD has been authorized by the legislature to move forward with a P3 for the first phase. The state will be responsible for the balance of the project from Ryan Street to I-10/I-210 East End. To date, \$800 million have been designated for the I-10 Calcasieu Bridge project. The sources of that amount are divided between state allocations of \$575 million, and direct federal funding of \$225 million. \$150 million of the federal funds were recently awarded through the Infrastructure Investment and Jobs Act (IIJA, aka the Bipartisan Infrastructure Law) Mega Grant Program. The first phase of the Calcasieu River Bridge Improvements Project (I-10/1-210 West End to Ryan Street) is estimated to cost \$1.5 billion, thus leaving a funding gap of \$700 million. That gap will be filled with private investment funds through a Private-Public Partnership (P3), which will complete the design, construct the project, and operate the facility over a 50-year period. The tolls collected will cover the P3 costs and pay the partners a return on their investment. An additional \$140 million has been committed from the State General Fund and the Highway Priority Program for right of way and other pre-construction costs. For more information, please see Section 3.16.16 of the DEIS as well as the Traffic and Revenue Analysis issued in 2021 as part of Appendix F (Preliminary Financial Feasibility Report) of the DEIS. F: Funding Commitments and Sources for Construction of the I-10 Calcasieu River Bridge Improvements Project are listed below: <ul style="list-style-type: none">• \$ 85 million – State General Obligation Bonds - \$10 million in Priority 1 + \$75 million in Priority 5• \$ 30 million – Coronavirus Response and Relief Supplement Act (CRRSA) – Federal legislation enacted in December 2020• \$ 50 million – Louisiana Rescue Plan Fund (e.g., 2021 American Rescue Plan) – 2021 Appropriation through Act 485• \$100 million – Louisiana Rescue Plan Fund (e.g., 2021 American Rescue Plan) – 2022 Appropriation through Act 117• \$100 million – State General Fund – 2022 Appropriation through Act 167• \$150 million – Infrastructure Investment and Jobs Act (IIJA) – 2022 discretionary grant award (\$600 million requested)• \$240 million – First six years of Vehicle Sales Tax – dedication through Act 486 (2021)/Act 505 (2022)• \$ 45 million – Transportation Trust Fund (Federal) – allocation from Highway Priority Program \$800 million – Total funding commitments for construction
Muhammad, Jayvon	12/13/2022	Public Hearing Comment (spoken directly to and transcribed by court reporter)	And my greatest concern of all is that those private companies, the majority of them probably aren't American-owned companies. So other countries are going to benefit off of the toll that Louisianians pay and others crossing the bridge. I think that's outrageous. And that's it. Thank you.	Comment Responses A, G, and FF. Theme A: Opposition to tolls/concerns about funding, Theme G: P3 contracting, and Theme FF: Build America, Buy America Act	A: Without tolls, this project would not be financially feasible. LADOTD has been authorized by the legislature to move forward with a P3 for the first phase. The state will be responsible for the balance of the project from Ryan Street to I-10/I-210 East End. To date, \$800 million have been designated for the I-10 Calcasieu Bridge project. The sources of that amount are divided between state allocations of \$575 million, and direct federal funding of \$225 million. \$150 million of the federal funds were recently awarded through the Infrastructure Investment and Jobs Act (IIJA, aka the Bipartisan Infrastructure Law) Mega Grant Program. The first phase of the Calcasieu River Bridge Improvements Project (I-10/1-210 West End to Ryan Street) is estimated to cost \$1.5 billion, thus leaving a funding gap of \$700 million. That gap will be filled with private investment funds through a Private-Public Partnership (P3), which will complete the design, construct the project, and operate the facility over a 50-year period. The tolls collected will cover the P3 costs and pay the partners a return on their investment. An additional \$140 million has been committed from the State General Fund and the Highway Priority Program for right of way and other pre-construction costs. For more information, please see Section 3.16.16 of the DEIS as well as the Traffic and Revenue Analysis issued in 2021 as part of Appendix F (Preliminary Financial Feasibility Report) of the DEIS. G: The P3 process is governed by state law and will be specified in contractual documents that will be a matter of public record. FF: The Build America, Buy America Act, (BABAA), enacted as part of the IIJA on November 15, 2021, focuses on maximizing the federal government's use of services, goods, products, and materials produced and offered in the United States. BABAA requires that all iron, steel, manufactured products, and construction materials used in federally funded projects for infrastructure must be produced in the United States. USDA is working with the Office of Management and Budget (OMB) Made in America Office to coordinate compliance with these procurement requirements. BABAA requirements apply to all recipients of Federal Financial Assistance who are: <ol style="list-style-type: none">1) Non-Federal Entities as defined as 2.CFR 200.12) Requesting funding for an infrastructure project and if3) The project involves construction, alteration, maintenance, or repair of infrastructure in the United States.

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Muhammad, Jayvon	12/13/2022	Public Hearing Open Mic Comment (transcribed by court reporter)	And then my last concern is what private investors make money off of the investment in the bridge? It concerns me that companies will invest and are not American companies but will make money off of toll paid by Americans. I just left another country where China was building toll roads, and they were making money off of the roads. And I do understand that some of these investors are not – that are stepping up are not American investors. And it just seems unethical in some way to me for other countries and investors to make money off of American tax paying dollars for roads, for something like infrastructure. Thank you.	Comment Responses A, G, H, and FF. Theme A: Opposition to tolls/concerns about funding, Theme G: Public-Private Partnership contracting, Theme H: Authorization of Tolling, and Theme FF: Build America, Buy America Act	A: Without tolls, this project would not be financially feasible. LADOTD has been authorized by the legislature to move forward with a P3 for the first phase. The state will be responsible for the balance of the project from Ryan Street to I-10/I-210 East End. To date, \$800 million have been designated for the I-10 Calcasieu Bridge project. The sources of that amount are divided between state allocations of \$575 million, and direct federal funding of \$225 million. \$150 million of the federal funds were recently awarded through the Infrastructure Investment and Jobs Act (IIJA, aka the Bipartisan Infrastructure Law) Mega Grant Program. The first phase of the Calcasieu River Bridge Improvements Project (I-10/I-210 West End to Ryan Street) is estimated to cost \$1.5 billion, thus leaving a funding gap of \$700 million. That gap will be filled with private investment funds through a Private-Public Partnership (P3), which will complete the design, construct the project, and operate the facility over a 50-year period. The tolls collected will cover the P3 costs and pay the partners a return on their investment. An additional \$140 million has been committed from the State General Fund and the Highway Priority Program for right of way and other pre-construction costs. For more information, please see Section 3.16.16 of the DEIS as well as the Traffic and Revenue Analysis issued in 2021 as part of Appendix F (Preliminary Financial Feasibility Report) of the DEIS. G: The P3 process is governed by state law and will be specified in contractual documents that will be a matter of public record. H: LADOTD has made the strategic decision to no longer own and operate toll facilities. LADOTD has been authorized by the Louisiana legislature to move forward with the P3 for the first phase of the project pursuant to Louisiana Revised Statutes (R.S.) § 48:250.4.A.(1), which states that if the Secretary determines it is in the best interest of Louisiana taxpayers, the LADOTD may solicit proposals and enter into contracts for P3 projects upon approval by the House and Senate Transportation, Highways, and Public Works Committees. The LADOTD shall comply with the provisions of R.S. 48:2084 through 48:2084.15 that are applicable to P3 projects of the Louisiana Transportation Authority and the provisions of Subpart C. Claims by Subcontractors, Suppliers, and Laborers (R.S. 48:256.3) and Claimant payments by the LADOTD (R.S. 48:256.5) to move forward with a P3 which includes tolling. LADOTD is following the legislative process required to achieve final approval. FF: The Build America, Buy America Act, (BABAA) enacted as part of the IIJA on November 15, 2021, focuses on maximizing the federal government’s use of services, goods, products, and materials produced and offered in the United States. BABAA requires that all iron, steel, manufactured products, and construction materials used in federally funded projects for infrastructure must be produced in the United States. USDA is working with the Office of Management and Budget (OMB) Made in America Office to coordinate compliance with these procurement requirements. BABAA requirements apply to all recipients of Federal Financial Assistance who are: 1. Non-Federal Entities as defined as 2.CFR 200.1 2. Requesting funding for an infrastructure project and if 3. The project involves construction, alteration, maintenance, or repair of infrastructure in the United States.
Pennartz, Chris	12/13/2022	Public Hearing Open Mic Comment (transcribed by court reporter)	And another question is who’s the one who’s going to be approving? You know, I know you didn’t answer about who approved the toll. But who is going to be the one in charge of approving the toll?	Comment Response H. Theme H: Authorization of tolling	H: LADOTD has made the strategic decision to no longer own and operate toll facilities. LADOTD has been authorized by the Louisiana legislature to move forward with the P3 for the first phase of the project pursuant to Louisiana Revised Statutes (R.S.) § 48:250.4.A.(1), which states that if the Secretary determines it is in the best interest of Louisiana taxpayers, the LADOTD may solicit proposals and enter into contracts for P3 projects upon approval by the House and Senate Transportation, Highways, and Public Works Committees. The LADOTD shall comply with the provisions of R.S. 48:2084 through 48:2084.15 that are applicable to P3 projects of the Louisiana Transportation Authority and the provisions of Subpart C. Claims by Subcontractors, Suppliers, and Laborers (R.S. 48:256.3) and Claimant payments by the LADOTD (R.S. 48:256.5) to move forward with a P3 which includes tolling. LADOTD is following the legislative process required to achieve final approval.
Otto, Jeffrey	12/22/2022	Website	How can we ensure that the awarding of the contract to operate this is a clean process? With that much money involved, it seems to me we ought to be worried about corruption, and which decision makers are going to benefit licitly, and illicitly.	Comment Responses G and H. Theme G: Public-Private Partnership contracting and Theme H: Authorization of Tolling	G: The P3 process is governed by state law and will be specified in contractual documents that will be a matter of public record. H: LADOTD has made the strategic decision to no longer own and operate toll facilities. LADOTD has been authorized by the Louisiana legislature to move forward with the P3 for the first phase of the project pursuant to Louisiana Revised Statutes (R.S.) § 48:250.4.A.(1), which states that if the Secretary determines it is in the best interest of Louisiana taxpayers, the LADOTD may solicit proposals and enter into contracts for P3 projects upon approval by the House and Senate Transportation, Highways, and Public Works Committees. The LADOTD shall comply with the provisions of R.S. 48:2084 through 48:2084.15 that are applicable to P3 projects of the Louisiana Transportation Authority and the provisions of Subpart C. Claims by Subcontractors, Suppliers, and Laborers (R.S. 48:256.3) and Claimant payments by the LADOTD (R.S. 48:256.5) to move forward with a P3 which includes tolling. LADOTD is following the legislative process required to achieve final approval.
Guintard, Charles	12/14/2022	Email	It's against federal law to put a toll on an existing interstate	Comment Response I. Theme I: Tolling of interstate highways	I: Under 23 U.S.C. 129(a)(1)(E), an existing toll-free bridge or tunnel may be converted into a toll facility as part of a project to reconstruct or replace the existing facility. This authority applies to bridges and tunnels that are located both on and off the Interstate Highway System. The prohibition on Interstate tolling applies to interstate highways (the roadway sections) but not interstate bridges.

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Gott, George	12/14/2022	Email	Is the I-10 bridge at Lake Charles the only new bridge with a proposed toll? How about the new I-10 bridge over the Mississippi at Baton Rouge?	Comment Response J. Theme J: Other tolled bridges	J: Several other bridges in Louisiana are currently tolled or proposed for tolling including the elevated portions of LA 1 to Port Fourchon (http://wwwsp.dotd.la.gov/Inside_LaDOTD/Divisions/Engineering/Environmental/Pages/default.aspx?RootFolder=%2FInside%5FLaDOTD%2FDivisions%2FEngineering%2FEnvironmental%2FDocuments%2FH%2E008145%20LA%201%20Golden%20Meadow%20to%20Port%20Fourchon&FolderCTID=0x012000C055341479DCD84E95C80E77E7755A9A&View={993143B3-FC7F-4567-86C2-C8EE52788C8D}), Belle Chasse (http://wwwsp.dotd.la.gov/Inside_LaDOTD/Divisions/Engineering/Environmental/Pages/default.aspx?RootFolder=%2FInside%5FLaDOTD%2FDivisions%2FEngineering%2FEnvironmental%2FDocuments%2FH%2E004791%20%20LA%2023%2D%20BELLE%20CHASSE%20BRIDGE%20AND%20TUNNEL&FolderCTID=0x012000C055341479DCD84E95C80E77E7755A9A&View={993143B3-FC7F-4567-86C2-C8EE52788C8D}), and Lake Pontchartrain Causeway (https://www.nola.com/news/traffic/10-things-to-know-about-the-lake-pontchartrain-causeway/article_d2fe86a8-4247-5a3d-844b-7050c6b658bc.html). As currently planned, the Mississippi River bridge proposed for south of Baton Rouge will be tolled.
Chandler, Paul	12/13/2022	Public Hearing Comment Card	Who approved a toll bridge?	Comment Responses H and I. Theme H: Authorization of tolling and Theme I: Tolling of Interstate Highways	H: LADOTD has been authorized by the Louisiana legislature pursuant to Louisiana Revised Statutes (R.S.) § 48:250.4.A.(1), which states that if the Secretary determines it is in the best interest of Louisiana taxpayers, the LADOTD may solicit proposals and enter into contracts for P3 projects upon approval by the House and Senate Transportation, Highways, and Public Works Committees. The LADOTD shall comply with the provisions of R.S. 48:2084 through 48:2084.15 that are applicable to P3 projects of the Louisiana Transportation Authority and the provisions of Subpart C. Claims by Subcontractors, Suppliers, and Laborers (R.S. 48:256.3) and Claimant payments by the LADOTD (R.S. 48:256.5) to move forward with a P3 which includes tolling. LADOTD is following the legislative process required to achieve final approval. I: Under 23 U.S.C. 129(a)(1)(E), an existing toll-free bridge or tunnel may be converted into a toll facility as part of a project to reconstruct or replace the existing facility. This authority applies to bridges and tunnels that are located both on and off the Interstate Highway System. The prohibition on Interstate tolling applies to interstate highways (the roadway sections) but not interstate bridges.
Chandler, Paul	12/13/2022	Public Hearing Open Mic Comment (transcribed by court reporter)	I work on one side of the bridge and work on another side of the bridge, all day back and forth. I really have a question, not necessarily a statement. I'm not sure if you can answer it or not. Who approved the tolling of the bridge? Has it been approved yet? So it's still in the works?	Comment Response H. Theme H: Authorization of tolling	H: LADOTD has been authorized by the Louisiana legislature pursuant to Louisiana Revised Statutes (R.S.) § 48:250.4.A.(1), which states that if the Secretary determines it is in the best interest of Louisiana taxpayers, the LADOTD may solicit proposals and enter into contracts for P3 projects upon approval by the House and Senate Transportation, Highways, and Public Works Committees. The LADOTD shall comply with the provisions of R.S. 48:2084 through 48:2084.15 that are applicable to P3 projects of the Louisiana Transportation Authority and the provisions of Subpart C. Claims by Subcontractors, Suppliers, and Laborers (R.S. 48:256.3) and Claimant payments by the LADOTD (R.S. 48:256.5) to move forward with a P3 which includes tolling. LADOTD is following the legislative process required to achieve final approval.
Vincent, Rusty	11/26/2022	Email	I would highly recommend that the new bridge design be very similar to the existing I-10 bridge going over the Sabine River. We can lower the height of the bridge to where it can allow deep draft recreational boats and tug/tow boats to go under. We do not need a taller height to allow ships because there is no more need for ship traffic in this area anymore. Having served on the Port of Lake Charles Harbor Safety Committee, I have had a lot of inside information on vessel traffic in this waterway. Keeping the bridge as low as possible makes construction a lot more affordable and allows the vehicle traffic to flow better and reducing traffic backups etc... any questions please feel free to contact me at this email or phone number below. I will be happy to discuss in more detail.	Comment Response K. Theme K: Bridge Design	K: Several studies were conducted to determine the optimum clearance for the bridge that would minimize impacts to navigation and still serve the needs of I-10 traffic. The studies concluded that a replacement bridge with 73 feet of vertical clearance would be the most advantageous alternative for achievement of the project purpose, cost effectiveness, and minimization of adverse impacts to both roadway and waterborne transportation. See the "I-10 Calcasieu River Bridge and Approaches Comprehensive Preliminary Alternatives Report" from May 2002 in the Document Library on the Project Website: https://www.i10lakecharles.com/documentlibrary
Otto, Jeffrey	12/22/2022	Website	Finally, one question I had after watching the nicely done and informative video: why can't the new bridge be as high as the old one? Why does it half (sic) to be lower my (sic) nearly half?	Comment Response K. Theme K: Bridge Design	K: Several studies were conducted to determine the optimum clearance for the bridge that would minimize impacts to navigation and still serve the needs of I-10 traffic. The studies concluded that a replacement bridge with 73 feet of vertical clearance would be the most advantageous alternative for achievement of the project purpose, cost effectiveness, and minimization of adverse impacts to both roadway and waterborne transportation. See the "I-10 Calcasieu River Bridge and Approaches Comprehensive Preliminary Alternatives Report" from May 2002 in the Document Library on the Project Website: https://www.i10lakecharles.com/documentlibrary .
Dunn, Sid	12/22/2022	Website	When building the bridge why not make it 4 lanes on each side to account for area growth as well as area evacuations? 3 lanes each way seems to satisfy the current needs not future needs for the next 40-50 years.	Comment Response L. Theme L: Number of Lanes	L: Traffic analyses performed for the project determined that three through lanes in each direction would meet future traffic needs. See Appendix B of the DEIS found in the Document Library on the Project Website: https://www.i10lakecharles.com/documentlibrary for more information. If Alternative 5G is selected, the I-10 Calcasieu River Bridge will consist of three through lanes and one auxiliary for a total of four lanes in each direction. Most of the remaining portions of the corridor will consist of three through lanes in each direction.

Comments Received During the 45-day Comment Period After the NOA of the DEIS and Comment Responses

Name (Last / First)	Date	Source	Comment(s)	Response ID and Theme	Response
Gott, George	12/14/2022	Email	Question: Why can't an alternative mooring site be provided for the Friend Ship? If the Friends Ship dock on First avenue is the only reason for rebuilding the I-10 bridge so high, why not provide an alternative berth and build the new bridge much lower at a significantly reduced cost?	Comment Response M. Theme M: Impacts to navigation	M: Proposed reduction in vertical clearance will impact Friend Ships. Several vessels operated by them will not be able to navigate under the new bridge. An alternative berthing arrangement for these vessels is being considered as mitigation.
Guidry, Marshall	12/14/2022	Email	I see the design and it looks really nice but if we can't afford such a fancy design without a toll, let's scale it back to a basic concrete structure so we can do away with the toll.	Comment Responses A, K, and N. Theme A: Opposition to tolls/concerns about funding, Theme K: Bridge Design, and Theme N: Basic Design	A: Without tolls, this project would not be financially feasible. LADOTD has been authorized by the legislature to move forward with a P3 for the first phase. The state will be responsible for the balance of the project from Ryan Street to I-10/I-210 East End. To date, \$800 million have been designated for the I-10 Calcasieu Bridge project. The sources of that amount are divided between state allocations of \$575 million, and direct federal funding of \$225 million. \$150 million of the federal funds were recently awarded through the Infrastructure Investment and Jobs Act (IIJA, aka the Bipartisan Infrastructure Law) Mega Grant Program. The first phase of the Calcasieu River Bridge Improvements Project (I-10/1-210 West End to Ryan Street) is estimated to cost \$1.5 billion, thus leaving a funding gap of \$700 million. That gap will be filled with private investment funds through a Private-Public Partnership (P3), which will complete the design, construct the project, and operate the facility over a 50-year period. The tolls collected will cover the P3 costs and pay the partners a return on their investment. An additional \$140 million has been committed from the State General Fund and the Highway Priority Program for right of way and other pre-construction costs. For more information, please see Section 3.16.16 of the DEIS as well as the Traffic and Revenue Analysis issued in 2021 as part of Appendix F (Preliminary Financial Feasibility Report) of the DEIS. K: Several studies were conducted to determine the optimum clearance for the bridge that would minimize impacts to navigation and still serve the needs of I-10 traffic. The studies concluded that a replacement bridge with 73 feet of vertical clearance would be the most advantageous alternative for achievement of the project purpose, cost effectiveness, and minimization of adverse impacts to both roadway and waterborne transportation. See the "I-10 Calcasieu River Bridge and Approaches Comprehensive Preliminary Alternatives Report" from May 2002 of the Document Library on the Project Website: https://www.i10lakecharles.com/documentlibrary . N: A practical conceptual approach to aesthetic design of structures, hardscape, and landscape, particularly considering the Context Sensitive Solutions and Design (CSS/D) for the project, has been prescribed by LADOTD in the P3 contract to allow the designers to incorporate aesthetic elements while minimizing costs and toll rates.
Simmons, Gordon D.	12/13/2022	Public Hearing Comment (spoken directly to and transcribed by court reporter)	My one question is they we're worried about groundwater contamination from pilings and piers. They wanted to lower the bridge on account of the trucking industry, but that interfered with the shipping industry. There was one option that solved all of these problems that I never heard discussed. Was a cut and covered immersed tube bridge ever considered? What people commonly mistakenly called a tunnel. It would not contaminate the groundwater. And I would like to know, did anyone ever discuss or even think about using an immersed tube prefab bridge?	Comment Response O. Theme O: Tunnel Alternative	O: A tunnel was not considered during development of the preliminary build alternatives. In coastal Louisiana these types of facilities are problematic from an operation and maintenance standpoint. The Department currently operates three submerged highway facilities in the state, one of which is being replaced with a bridge at this time.
Simmons, Gordon D.	12/13/2022	Public Hearing Comment (spoken directly to and transcribed by court reporter)	Instead of having an 85- to 90-foot grade elevation change on the new highway bridge, you would have it maximum of 55 to 60-foot elevation change going under the river, as the river is only 30 feet deep. It would not have impeded the shipping traffic. You would be helping the truckers more. The approaches to the bridge would be shorter. And you wouldn't be contaminating the groundwater by migration going down from the contaminated groundwater to the aquifer down the side of the pylons.	Comment Response K. Theme K: Bridge Design	K: Several studies were conducted to determine the optimum clearance for the bridge that would minimize impacts to navigation and still serve the needs of I-10 traffic. The studies concluded that a replacement bridge with 73 feet of vertical clearance would be the most advantageous alternative for achievement of the project purpose, cost effectiveness, and minimization of adverse impacts to both roadway and waterborne transportation. See the "I-10 Calcasieu River Bridge and Approaches Comprehensive Preliminary Alternatives Report" from May 2002 of the Document Library on the Project Website: https://www.i10lakecharles.com/documentlibrary .
Miller, Bahnsen	12/19/2022	Email	My family owns property around the I-10/2-10 west intersection that may be part of the expansion project. Can you give me a general estimate on when the expansion plans will be finalized and when property owners who own property in this area will be notified?	Comment Response P. Theme P: Property Impacts	P: To provide uniform and equitable treatment for persons whose property is acquired for public use, Congress passed the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970. This law is the foundation for LADOTD policy for the acquisition of right of way and relocation assistance. A copy of the brochure outlining the process to protect the rights of an owner of real property that would be acquired for the proposed project is provided in Appendix I of the Draft EIS available online at www.i10lakecharles.com .
Hughes, Gwen	12/9/2022	Email	We have three rental properties located on Railroad Ave. Can you tell me which Alternative map would have the least impact on our properties. I appreciate your help.	Comment Response P. Theme P: Property Impacts	P: To provide uniform and equitable treatment for persons whose property is acquired for public use, Congress passed the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970. This law is the foundation for LADOTD policy for the acquisition of right of way and relocation assistance. A copy of the brochure outlining the process to protect the rights of an owner of real property that would be acquired for the proposed project is provided in Appendix I of the Draft EIS available online at www.i10lakecharles.com .

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Name (Last / First)	Date	Source	Comment(s)	Response ID and Theme	Response
Tritico, Michael (on behalf of RESTORE)	12/22/2022	Email	I have been saying, I believe since before 2002 when you announced some "alternatives," and after that in the Public Meetings and written comment periods that "Since there is no practical way to keep the river crossing where it now exists, the logical thing is to re-locate Interstate 10 to high and solid ground north of the present location." Once I even provided you with a detailed route of that north loop that would be only a very few miles longer than the route that you insist on perpetuating along with all of its problems.	Comment Response Q. Theme Q: Alternative Alignment	Q: Early in the process, the Project Team considered alternative realignments, but they were extremely expensive. A far northern bypass may be considered for the area in the long-term, but it would only serve through traffic and the surrounding small towns and villages. The I-10 Calcasieu Bridge project must deal with an aging bridge that needs to be replaced and the aging interstate that serves Lake Charles, Westlake, and Sulphur residents and businesses. Beginning in 2000, a comprehensive alternatives analysis was undertaken. This analysis include several stages of alternatives development and refinement, issuance of a Feasibility Study, multiple bridge height and engineering studies, and public and agency coordination. Details of the alternatives development process can be found in Section 2 of the DEIS, the I-10 Calcasieu River Bridge and Approaches Comprehensive Preliminary Alternatives Report (issued in 2002), and the Preliminary Alternatives Screening Methodology (issued in 2017). Public and agency comments received throughout the alternatives development process were collected and can be found in Appendix C of the DEIS and are also included individually in the Public/Agency Meeting Material section of the Document Library on the project's website, https://i10lakecharles.com/documentlibrary
Tritico, Michael (on behalf of RESTORE)	12/22/2022	Email	No matter what comments I have submitted on overall concepts or on specific details you have refused to acknowledge them or to incorporate into your work any alternatives that the comments would have generated had you taken them seriously. I was unable to attend the Public Meeting this time but I read a newspaper article which said that the main topic of the evening was your insistence on making the project one to be financed by tolls. The longer you piddle around the greater will be the tolls that you will demand in order to pay for a route that should be junked.	Comment Response A. Theme A: Opposition to tolls/concerns about funding	A: Without tolls, this project would not be financially feasible. LADOTD has been authorized by the legislature to move forward with a P3 for the first phase. The state will be responsible for the balance of the project from Ryan Street to I-10/I-210 East End. To date, \$800 million have been designated for the I-10 Calcasieu Bridge project. The sources of that amount are divided between state allocations of \$575 million, and direct federal funding of \$225 million. \$150 million of the federal funds were recently awarded through the Infrastructure Investment and Jobs Act (IIJA, aka the Bipartisan Infrastructure Law) Mega Grant Program. The first phase of the Calcasieu River Bridge Improvements Project (I-10/1-210 West End to Ryan Street) is estimated to cost \$1.5 billion, thus leaving a funding gap of \$700 million. That gap will be filled with private investment funds through a Private-Public Partnership (P3), which will complete the design, construct the project, and operate the facility over a 50-year period. The tolls collected will cover the P3 costs and pay the partners a return on their investment. An additional \$140 million has been committed from the State General Fund and the Highway Priority Program for right of way and other pre-construction costs. For more information, please see Section 3.16.16 of the DEIS as well as the Traffic and Revenue Analysis issued in 2021 as part of Appendix F (Preliminary Financial Feasibility Report) of the DEIS.
Tritico, Michael (on behalf of RESTORE)	12/22/2022	Email	I am not sure why I should bother going through your Draft EIS and submitting comments since you will disregard any public comments that worry you and make you have to reconsider your pre-conceived plans. However, I will try again for a few things: From the Draft's PDF Page 53 your latest chosen alternative is called 5G. It includes many sub-projects in addition to the river crossing. Those inclusions, in reality, are more necessary from the perspective of lining up support from different stakeholder groups than they are from the perspective of preparing a plan to provide the public with a safe way to get from one side of the Calcasieu River to the other, past the failing bridge. Although it did make sense, once you had locked in a decision to demand a river crossing at the existing location and had disregarded other routes, to have included the attempt to de-bottleneck the railroad mess in Westlake, other problems, such as the truck-rollover mess in North Lake Charles have simply delayed your focus on the central problem, the unsafe bridge. Trying to build a new bridge where there are insoluble problems is a waste of time.	Comment Response Q. Theme Q: Alternative Alignment	Q: Early in the process, the Project Team considered alternative realignments, but they were extremely expensive. A far northern bypass may be considered for the area in the long-term, but it would only serve through traffic and the surrounding small towns and villages. The I-10 Calcasieu Bridge project must deal with an aging bridge that needs to be replaced and the aging interstate that serves Lake Charles, Westlake, and Sulphur residents and businesses. Beginning in 2000, a comprehensive alternatives analysis was undertaken. This analysis include several stages of alternatives development and refinement, issuance of a Feasibility Study, multiple bridge height and engineering studies, and public and agency coordination. Details of the alternatives development process can be found in Section 2 of the DEIS, the I-10 Calcasieu River Bridge and Approaches Comprehensive Preliminary Alternatives Report (issued in 2002), and the Preliminary Alternatives Screening Methodology (issued in 2017). Public and agency comments received throughout the alternatives development process were collected and can be found in Appendix C of the DEIS and are also included individually in the Public/Agency Meeting Material section of the Document Library on the project's website, https://i10lakecharles.com/documentlibrary
Tritico, Michael (on behalf of RESTORE)	12/22/2022	Email	PDF Pages 12 and 13 begin to highlight the reality that your current chosen alternative is fraught with hazardous waste impediments, 23 (twenty-three) different sites of concern. PDF Pages 34 then admits that "The major unresolved issue has been and continues to be the risks related to the EDC that has contaminated the soils and groundwater within the existing and proposed Right of Way." Of course, that massive, widespread and deep saturation of the entire area of and around the existing bridge and its western approach, including the proposed Samson Street sub-project, with Ethylene Dichloride should have been sufficient reason for you to choose an alternative on high, solid ground to the north of Lake Charles and Westlake.	Comment Response R. Theme R: EDC contamination	R: There is no evidence that the EDC will affect the integrity of the new bridge once it is constructed. Technical solutions allowing for shallower foundations such as a retaining wall or short pilings were considered in order to reduce the possibility of downward migration of the EDC. The preferred alternative would allow a fully directional interchange at Sampson Street to be elevated over I-10. Sampson Street would also be elevated, connecting four ramps to the interstate, and providing a grade separation for the railroad crossings. Section 3.12 of the DEIS as well as Section 3.16.13 and Section 4.2.9 detail the process by which hazardous waste concerns will continue to be investigated and mitigated to the fullest extent possible.

Comments Received During the 45-day Comment Period After the NOA of the DEIS and Comment Responses

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Tritico, Michael (on behalf of RESTORE)	12/22/2022	Email	PDF Page 33 has an interesting sidestep: None of the alternatives “ would meet the last purpose goal d) safety concerns.” Therefore, a lot of busy work was done but the public still ends up with an unsafe route. Putting a new, safe bridge at the chosen latitude just cannot be done.	Comment Response S. Theme S: Safety	S: 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 which would meet the purpose and need for safety and independently justify the proposed project. However, a comparative safety analysis indicates that the preferred alternative will meet current design standards for safety.
Tritico, Michael (on behalf of RESTORE)	12/22/2022	Email	PDF Page 72 The preferred alternative has abandoned the concept of pedestrian and bicycle river crossings as part of the proposed bridge complex.	Comment Response T. Theme T: Pedestrian and bicycle facilities	T: Due to local interests in the provision of ADA-compliant bicycle and pedestrian facilities in Westlake and Lake Charles, the Public-Private partnership solicitation includes directions to propose projects addressing bicycle and pedestrian facilities. There is a \$10 million budget set-aside for options to be evaluated including a connection using a ferry operating across the Calcasieu River and multi-use paths in and around the vicinity of the bridge on both sides of the river. It should be noted that, per Louisiana Revised Statute 32:263, use of bicycles on any Louisiana interstate is prohibited. Therefore, there will not be any bike/ped facility on the new I-10 bridge structure. However, Reasonable Alternative 3A does include a design that would accommodate bicycle-pedestrian facilities as part of its movable bridge design.
Tritico, Michael (on behalf of RESTORE)	12/22/2022	Email	PDF Page 34 discussed that situation and seems to half-heartedly suggest that maybe later there might be some way to consider the public's expressed interest in such a feature.	Comment Response T. Theme T: Pedestrian and bicycle facilities	T: Due to local interests in the provision of ADA-compliant bicycle and pedestrian facilities in Westlake and Lake Charles, the Public-Private partnership solicitation includes directions to propose projects addressing bicycle and pedestrian facilities. There is a \$10 million budget set-aside for options to be evaluated including a connection using a ferry operating across the Calcasieu River and multi-use paths in and around the vicinity of the bridge on both sides of the river. It should be noted that, per Louisiana Revised Statute 32:263, use of bicycles on any Louisiana interstate is prohibited. Therefore, there will not be any bike/ped facility on the new I-10 bridge structure. However, Reasonable Alternative 3A does include a design that would accommodate bicycle-pedestrian facilities as part of its movable bridge design.
Tritico, Michael (on behalf of RESTORE)	12/22/2022	Email	Less half-heartedly the discussion gives several reasons the public should not keep its hope ups so at least we know not to expect that crossing to happen. That is just another example of how pointless are the public comment opportunities.	Comment Response T. Theme T: Pedestrian and bicycle facilities	T: Due to local interests in the provision of ADA-compliant bicycle and pedestrian facilities in Westlake and Lake Charles, the Public-Private partnership solicitation includes directions to propose projects addressing bicycle and pedestrian facilities. There is a \$10 million budget set-aside for options to be evaluated including a connection using a ferry operating across the Calcasieu River and multi-use paths in and around the vicinity of the bridge on both sides of the river. It should be noted that, per Louisiana Revised Statute 32:263, use of bicycles on any Louisiana interstate is prohibited. Therefore, there will not be any bike/ped facility on the new I-10 bridge structure. However, Reasonable Alternative 3A does include a design that would accommodate bicycle-pedestrian facilities as part of its movable bridge design.
Tritico, Michael (on behalf of RESTORE)	12/22/2022	Email	Why you keep having these presentations and comment opportunities decade-after-decade only to disregard reality is as much of a problem as is the fact that the existing bridge is likely, before you ever get through with the planning process, to finish falling in slow motion because of the EDC ruination of its soil support. When that collapse happens the public record will show how hard people tried to get something actual done but how the planners could not accept the most critical facts.	Comment Response R. Theme R: EDC contamination	R: There is no evidence that the EDC will affect the integrity of the new bridge once it is constructed. Technical solutions allowing for shallower foundations such as a retaining wall or short pilings were considered in order to reduce the possibility of downward migration of the EDC. The preferred alternative would allow a fully directional interchange at Sampson Street to be elevated over I-10. Sampson Street would also be elevated, connecting four ramps to the interstate, and providing a grade separation for the railroad crossings. Section 3.12 of the DEIS as well as Section 3.16.13 and Section 4.2.9 detail the process by which hazardous waste concerns will continue to be investigated and mitigated to the fullest extent possible.

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Name (Last / First)	Date	Source	Comment(s)	Response ID and Theme	Response
Otto, Jeffrey	12/22/2022	Website	My main suggestion is that a pedestrian and bicycle lane be included, and that there be a lookout over the lake at the top where walkers and bikers can rest and take in the views. I trust that the design of such a lane can be accomplished in a way that minimizes the unpleasant effects of thousands of motor vehicles speeding by at 70 mph. If done right, this could be something that brings people to Lake Charles. It's important that the pedestrian and bicycle lane have safe and convenient access points to the lake front. An alternative would be to construct such a lane on the rail bridge, but of course there wouldn't be the nice views from that span.	Comment Response T. Theme T: Pedestrian and bicycle facilities	T: Due to local interests in the provision of ADA-compliant bicycle and pedestrian facilities in Westlake and Lake Charles, the Public-Private partnership solicitation includes directions to propose projects addressing bicycle and pedestrian facilities. There is a \$10 million budget set-aside for options to be evaluated including a connection using a ferry operating across the Calcasieu River and multi-use paths in and around the vicinity of the bridge on both sides of the river. It should be noted that, per Louisiana Revised Statute 32:263, use of bicycles on any Louisiana interstate is prohibited. Therefore, there will not be any bike/ped facility on the new I-10 bridge structure. However, Reasonable Alternative 3A does include a design that would accommodate bicycle-pedestrian facilities as part of its movable bridge design.
Elmer, Lollion	11/17/2022	Email	Why will the old 1-10 Calcasieu River Bridge be demolished? Could it not be put to good use? Pedestrian traffic, etc.?	Comment Response U. Theme U: Re-use of existing bridge	U: As stipulated in the Section 106 agreement, LADOTD marketed the bridge for sale as non-vehicular, adaptive re-use through its Dedicated Historic Bridge Marketing webpages (http://wwwsp.dotd.la.gov/Inside_LaDOTD/Divisions/Engineering/Historic_Bridge_Marketing/Pages/default.aspx and http://wwwsp.dotd.la.gov/Inside_LaDOTD/Divisions/Engineering/Historic_Bridge_Marketing/Pages/I-10-Calcasieu-River-Bridge.aspx). No one expressed interest. In addition, a similar process was undertaken for the I-10 Calcasieu River Bridge US 90 over I-10 overpass (http://wwwsp.dotd.la.gov/Inside_LaDOTD/Divisions/Engineering/Historic_Bridge_Marketing/Pages/US-90-OVER-I-10-OVERPASS.aspx), with a similar outcome of no one expressing an interest.
Rembert, Vannah	12/10/2022	Email	What is the new proposed height of the I-10 bridge in Lake Charles?	Comment Response K. Theme K: Bridge Design	K: Several studies were conducted to determine the optimum clearance for the bridge that would minimize impacts to navigation and still serve the needs of I-10 traffic. The studies concluded that a replacement bridge with 73 feet of vertical clearance would be the most advantageous alternative for achievement of the project purpose, cost effectiveness, and minimization of adverse impacts to both roadway and waterborne transportation. See the "I-10 Calcasieu River Bridge and Approaches Comprehensive Preliminary Alternatives Report" from May 2002 in the Document Library on the Project Website: https://www.i10lakecharles.com/documentlibrary .
Bruce, John (on behalf of the Calcasieu Parish Policy Jury)	12/21/2022	Email	Letter included in Attachment E. Comments broken down below	Comment Responses V, W, and X. Theme V: Traffic impacts during construction, Theme W: Traffic impacts from closure of LA 378 (Sampson Street), and Theme X: Extension of Pete Manena Road.	V: The P3 is required to create a management plan to accommodate traffic during construction for facilities within the project area. On the interstate, two lanes of traffic in either direction would remain open during construction. Occasional and short-term closures would occur as needed. The management plan will address issues within this area in accordance with LADOTD and FHWA policies. The scope of the management plan does not include addressing issues on the roadway network outside this area or resolving regional traffic impacts. W: If Alternative 5G were built, Sampson Street would be completely closed for a period of approximately 18 months. During this period, the main span of the new interchange would be constructed and tied into the new I-10 Calcasieu River Bridge. Traffic between Sulphur Avenue and I-10 would have to detour. Signage indicating the best detours for traffic from Westlake to I-10 will be installed for these detours. Figure 67 on page 3-101 of the Draft EIS illustrates potential detours during the temporary closure of Sampson Street. X: The proposed improvements for the project do not include extension of Pete Manena Road, which is outside the project area.
Bruce, John (on behalf of the Calcasieu Parish Policy Jury)	12/21/2022	Email	Construction activities will result in altered traffic patterns impacting Parish infrastructure. It is requested that these impacts be identified and mitigated prior to or as part of this project. These impacts may pertain to safety, capacity, pavement preservation, signalization, and other such concerns. Locations of concern are listed in the letter in Attachment E.	Comment Responses V and W. Theme V: Traffic impacts during construction and Theme W: Traffic impacts from closure of LA 378 (Sampson Street)	V: The P3 is required to create a management plan to accommodate traffic during construction for facilities within the project area. On the interstate, two lanes of traffic in either direction would remain open during construction. Occasional and short-term closures would occur as needed. The management plan will address issues within this area in accordance with LADOTD and FHWA policies. The scope of the management plan does not include addressing issues on the roadway network outside this area or resolving regional traffic impacts. W: If Alternative 5G were built, Sampson Street would be completely closed for a period of approximately 18 months. During this period, the main span of the new interchange would be constructed and tied into the new I-10 Calcasieu River Bridge. Traffic between Sulphur Avenue and I-10 would have to detour. Signage indicating the best detours for traffic from Westlake to I-10 will be installed for these detours. Figure 67 on page 3-101 of the Draft EIS illustrates potential detours during the temporary closure of Sampson Street.

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Bruce, John (on behalf of the Calcasieu Parish Policy Jury)	12/21/2022	Email	Any closure of La 378, between IH 10 and La 379 (Sulphur Avenue/OST). These additional volumes would likely lead to substantial delays and potential safety issues along the corridor. Existing intersection control and railroad operations will magnify the delay and safety issues associated with the diversion of traffic during construction and closures.	Comment Responses W. Theme W: Traffic impacts from closure of LA 378 (Sampson Street)	W: If Alternative 5G were built, Sampson Street would be completely closed for a period of approximately 18 months. During this period, the main span of the new interchange would be constructed and tied into the new I-10 Calcasieu River Bridge. Traffic between Sulphur Avenue and I-10 would have to detour. Signage indicating the best detours for traffic from Westlake to I-10 will be installed for these detours. Figure 67 on page 3-101 of the Draft EIS illustrates potential detours during the temporary closure of Sampson Street.
Bruce, John (on behalf of the Calcasieu Parish Policy Jury)	12/21/2022	Email	Additionally, it is requested that Pete Manena Road be extended approximately 4,500 lf northeasterly to connect with the western termini of the IH 10 South Service Road. This extension would provide direct access to IH 10 (Exit 26), supporting Mike Hooks Road/Miller Avenue/Landry Street.	Comment Response X. Theme X: Extension of Pete Manena Road.	X: The proposed improvements for the project do not include extension of Pete Manena Road, which is outside the project area.
Tyler, Scott (on behalf of Phillips 66)	12/28/2022	US Mail & Email	Letter providing comments on the Draft EIS is provided in Attachment XXX. Comments with section references listed below.	See below.	
Tyler, Scott (on behalf of Phillips 66)	12/28/2022	US Mail & Email	Comment #1 - Section 3.8.4 p. 3-64: As per LADOTD's statement on p. 3-80 that the upper limits of the Chicot aquifer occur at approximately 120 feet below ground surface, there is no indication of any plans to advance pilings beyond approximately 75 feet below ground surface, so it is unlikely that subsurface activities will introduce contaminants into the aquifer. Further, LDEQ has issued piling depth guidelines for the areas north and south of I-10 as shown in Attachment 2 to these Comments. The project can safely proceed in accordance with those guidelines. As the project advances and precise piling locations are determined, Phillips 66 will work cooperatively with LDEQ and LADOTD to ensure that the bridge construction activities are done safely and without added risk to the Chicot aquifer.		Comment noted. It is unlikely that subsurface activities will introduce contaminants into the aquifer. The statement in question is worded as: "Subsurface activities such as pile driving and excavation for construction of the I-10 Calcasieu Bridge and Improvements Project have the potential to puncture the confining clay layer creating a point of recharge that might introduce contaminants into the aquifer." Nowhere does it state that the project cannot safely proceed. An additional sentence has been added as errata in the FEIS to further clarify. "Technical solutions allowing for shallower foundations such as a retaining wall or short pilings were considered to reduce the possibility of downward migration of the EDC."
Tyler, Scott (on behalf of Phillips 66)	12/28/2022	US Mail & Email	Comment #2 - Section 3.12.2 p. 3-80: The release occurred at Tank 415, located inside P66 facility and ~0.25 miles from the stated intersection, and did not impact LADOTD right-of-way (ROW) or areas within the new proposed project footprint.	Comment Response Y. Theme Y: 1987 Release	Y: The document will be corrected to note that the 1987 release occurred at Tank 415, located inside the P66 facility and approximately 0.25 miles from the intersection of the I-10 Service Road and Mike Hooks Road.
Tyler, Scott (on behalf of Phillips 66)	12/28/2022	US Mail & Email	Comment #3a - Section 3.12.2 p. 3-80: Unable to locate "Figure 4" illustrating the location and 2016 extent of EDC contamination.	Comment Response Z. Theme Z: 1994 release, location, and extents	Z: The sentence referring to Figure 4 will be corrected to read as follows: "The location and extent of the 1994 release as delineated in the first quarter of 2016 are illustrated on Figure 10." The First Quarter 2016 delineation was used to inform the alternatives analysis and conceptual engineering as described in the Draft EIS. . The full extent, depth, and migration of the contamination is uncertain and dynamic. LADOTD and its partners will continue to provide available data and information to the public. The information in Appendix O, showing the most current data at the time of publication, is readily available to the public through the Draft EIS, which is available online and in public venues such as libraries and the LADOTD District Office.
Tyler, Scott (on behalf of Phillips 66)	12/28/2022	US Mail & Email	Comment #3b – Section 3.12.2 p. 3-80: Since LADOTD uses 2021 data to depict the EDC and Vinyl Chloride plumes in the Appendix O figures, consider updating "Figure 4" to depict the 2021 extent of EDC contamination so that the most current data is presented to the public.	Comment Response Z. Theme Z: 1994 release, location, and extents	Z: The sentence referring to Figure 4 will be corrected to read as follows: "The location and extent of the 1994 release as delineated in the first quarter of 2016 are illustrated on Figure 10." The First Quarter 2016 delineation was used to inform the alternatives analysis and conceptual engineering as described in the Draft EIS. . The full extent, depth, and migration of the contamination is uncertain and dynamic. LADOTD and its partners will continue to provide available data and information to the public. The information in Appendix O, showing the most current data at the time of publication, is readily available to the public through the Draft EIS, which is available online and in public venues such as libraries and the LADOTD District Office.
Tyler, Scott (on behalf of Phillips 66)	12/28/2022	US Mail & Email	Comment #4 – Section 3.12.2 p. 3-80: There have been no confirmed detections of EDC above the RECAP GW_SS in the Upper Chicot Aquifer beneath LADOTD ROW or planned ROW acquisition for the new I-10 bridge and access roads.	Comment Response AA. Theme AA: Detections of EDC in the Chicot Aquifer	AA: The statement refers to the Gumbo Clay layer and Chicot Aquifer in general to correct a misconception that the clay layer is impermeable. Migration of contaminants from any point on the surface could potentially cause contamination to the drinking water throughout the aquifer. See the June 1995 Phase III Site Assessment report from RETEC as well as the July 2012 and October 2014 sample results from MW-49D showing EDC contamination in the Chicot Aquifer.

Comments Received During the 45-day Comment Period After the NOA of the DEIS and Comment Responses

Name (Last / First)	Date	Source	Comment(s)	Response ID and Theme	Response
Tyler, Scott (on behalf of Phillips 66)	44923	US Mail & Email	Comment #5 – Section 3.12.2 p. 3-84: This statement is accurate only for samples collected south of I-10; however, this statement is not accurate for any monitoring wells sampled north of I-10 (in the path of the proposed bridge and elevated ramps). All groundwater samples collected from monitoring wells north of I-10 meet the site-specific RECAP standard for EDC. This includes quarterly data collected over a +10-year period (2011-2022).	Comment Response BB. Theme BB: Groundwater recovery system	BB: The statement has been revised: “After a groundwater recovery system was installed, a site-specific RECAP standard was established. The recovery system was installed to intercept and remove free product and contaminated groundwater in the area. Based on the available information at this time, groundwater contamination is believed to still be present within the existing and required ROW north of I-10 as deep as 80 feet bgs, within the base of the LIU.”
Tyler, Scott (on behalf of Phillips 66)	12/28/2022	US Mail & Email	Comment #6 – Section 3.12.2 p. 3-84: This statement is incorrect. The groundwater recovery system was installed in 1995 as part of the cleanup response for the 1994 release and has been operated and monitored under LADEQ Compliance Order No. WE-C-96-0011 (1996) and the Corrective Action Plan (1999). The groundwater recovery system was expanded in 2010 to address impacts beneath LADOTD ROW (Ditch 5 and beneath I-10) that were identified during the 2007 investigations. The site-specific RECAP cleanup standards for EDC in groundwater were approved by the LADEQ in 2013. The site-specific RECAP standards have been satisfied for all areas north of I10.	Comment Response BB. Theme BB: Groundwater recovery system	BB: The statement has been revised: “After a groundwater recovery system was installed, a site-specific RECAP standard was established. The recovery system was installed to intercept and remove free product and contaminated groundwater in the area. Based on the available information at this time, groundwater contamination is believed to still be present within the existing and required ROW north of I-10 as deep as 80 feet bgs, within the base of the LIU.”
Tyler, Scott (on behalf of Phillips 66)	12/28/2022	US Mail & Email	Comment #7 – Section 3.12.2 p. 3-84: P66 notes that a more accurate statement would be “groundwater contamination above the RECAP screening standard, but below the site-specific RECAP standard, is believed...”.	Comment Response CC. Theme CC: Groundwater contamination	CC: The statement has been revised: “After a groundwater recovery system was installed, a site-specific RECAP standard was established. The recovery system was installed to intercept and remove free product and contaminated groundwater in the area. Based on the available information at this time, groundwater contamination is believed to still be present within the existing and required ROW north of I-10 as deep as 80 feet bgs, within the base of the LIU.”
Tyler, Scott (on behalf of Phillips 66)	12/28/2022	US Mail & Email	Comment #8 – Section 3.12.2 p. 3-84: LADOTD has completed the proposed borings needed for delineation to the northwest. Many of the additional borings noted (22 of 36 borings) were completed in 3Q/4Q 2021. The borings located west/northwest of our western-most monitoring well clusters in the marsh were non-detect for EDC (based on P66 split-sample analysis).	Comment Response DD. Theme DD: Additional borings	DD: The sentence will be replaced with: Wells will be used to monitor for contaminants during construction.
Tyler, Scott (on behalf of Phillips 66)	12/28/2022	US Mail & Email	Comment #9 – Section 3.12.7 p. 3-87: There are no data to support this claim. In fact, there are data (held by the LADOTD with P66 split samples) showing this assumption to be incorrect. P66 split sample data from LADOTD’s 3Q/4Q 2021 borings confirmed EDC detections below the site-specific RECAP standard in the vicinity of UIU and LIU monitoring wells that have historically had detections of EDC below the site-specific RECAP standard in the area we refer to as the “EDC slug”. LADOTD also completed two clusters of borings in the UIU/LIU on the east side of Sampson Street, northwest of the marsh, and P66 split sample data were non-detect for EDC.	Comment Response DD. Theme DD: Additional borings	DD: The sentence will be replaced with: Wells will be used to monitor for contaminants during construction.
Tyler, Scott (on behalf of Phillips 66)	12/28/2022	US Mail & Email	Comment #10 – Appendix O: Soil data is from 2009 before groundwater recovery was initiated in the Ditch 5 area and beneath I-10 and likely represent the high mark of historic concentrations. As mentioned in the DRAFT EIS, EDC is not prone to adhering to soil or suspended particulates in groundwater. These data likely reflect dissolved EDC in groundwater within the soil pore space. As such, concentrations are certainly lower today after +10 years of groundwater remediation in this area.		The soil data has been accurately reported. In addition, borings installed in 2021, particularly TW-11UI and TW-13UI found EDC in soil at 0.0757 and 0.0764 mg/kg respectively. This is comparable to the 0.082 mg/kg found in MW-43UI in 2009.

Comments Received During the 45-day Comment Period After the NOA of the DEIS and Comment Responses

Name (Last / First)	Date	Source	Comment(s)	Response ID and Theme	Response
Tyler, Scott (on behalf of Phillips 66)	12/28/2022	US Mail & Email	Comment #11 – Appendix O Figures C-2, C-3, and C-5: EDC plume is depicted incorrectly. EDC does not exceed 0.005 mg/L at MW-41LI or MW-44LI, yet these wells are included within the plume boundary. A more accurate depiction would be the plume boundary centered around MW-48LI. See Attachment to these Comments for a more accurate depiction.		Figures C-2, C-3, and C-5 depict Cross Sections and soil test results in conjunction with the fence diagram of Figure C-1; they do not depict plume boundaries. If the comment is intended to address the plume boundary for the Lower Interbedded Unit from the First Quarter of 2020, which is found in Figure 2, that Figure accurately reflects the data on which the interpolations were based.
Tyler, Scott (on behalf of Phillips 66)	12/28/2022	US Mail & Email	Comment #12 – Appendix O Figure 3: This Figure is not accurate and is misleading. There is no reasonable basis to connect the two limited areas of detection when there is intervening monitoring well data that are below screening standard. See Attachment to these Comments for a more accurate depiction.		Figure 3 depicts data from the Upper Interbedded Unit. There is no reason to believe that the contamination found in MW-34UI to the north is not connected to the contamination originating from the Ditch 5 area to the south. The intervening monitor wells included in the plume had EDC detections consistent with the plume depiction.
Tyler, Scott (on behalf of Phillips 66)	12/28/2022	US Mail & Email	Comment #13 – Appendix O Figures 8, 11, 14, and 17: This Figure is not accurate and is misleading. There is no reasonable basis to connect the two limited areas of detection when there is intervening monitoring well data that are below screening standard. See Attachment to these Comments for a more accurate depiction.		As noted in response to Comment 12 above, there is no reason to believe that the contamination found in MW-32LI to the north is not connected to the contamination found in MW-48LI to the south. The monitor well network is not so dense, and the interbedded unit is not so uniform, as to preclude a connection between the contaminated wells.
Tyler, Scott (on behalf of Phillips 66)	12/28/2022	US Mail & Email	Comment #14 – Appendix O Figure 9: This Figure is not accurate and is misleading. There is no reasonable basis to connect the two limited areas of detection when there is intervening monitoring well data that are below screening standard. See Attachment to these Comments for a more accurate depiction.		As noted in response to Comment 12 above, there is no reason to believe that the contamination found in MW-34UI to the north is not connected to the contamination coming from the Ditch 5 area to the south. Such contamination was found in MW-47UI and had previously been found in MW-43UI.
13377942121@tmomail.com	12/29/2022	Email	I know we need a new bridge but for those of us who are single parents and those on limited resources a toll would be a hardship having to work in Lake Charles everyday. It would be taking food from my family. Things are hard enough already without that cost or worry. Have been part of this community for all my life why be penalized now.	Comment Response C. Theme C: Impacts on low-income persons	C: Measures to address the impacts of tolling on low-income persons include the establishment of a local auto-rate toll that will not exceed \$2.88 per trip expressed in 2021 dollars. A more comprehensive explanation is included in the Draft EIS, specifically pages 3-15 to 3-20. Tolls rates will escalate over time with inflation.

Appendix A.2
Public Comment Letters and Email Received
on the DEIS during the 45-day Comment
Period after NOA of the DEIS



CALCASIEU PARISH POLICE JURY

GOVERNING AUTHORITY OF CALCASIEU PARISH, LOUISIANA

DIVISION OF ENGINEERING & PUBLIC WORKS

P.O. Drawer 3287
Lake Charles, Louisiana 70602
337/ 721-4100
Fax 337/ 721-4194
www.cppj.net

December 21, 2022

I-10 Calcasieu River Bridge Project
c/o HNTB
10000 Perkins Rowe
Baton Rouge, La. 70810

**Ref: I 10 Calcasieu River Bridge Public Hearing
S.P No. H.003931**

Dear Sir:

Pertaining to the public hearing, December 13, 2022, I offer the following:

Construction activities will result in altered traffic patterns impacting Parish infrastructure. It is requested that these impacts be identified and mitigated prior to or as part of this project. These impacts may pertain to safety, capacity, pavement preservation, signalization, and other such concerns. Locations of concern include but are not limited to the following:

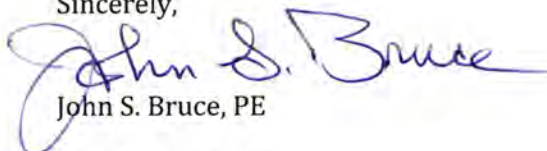
- Old Spanish Trail (E Burton Street)
- Trousdale Road
- PPG Drive
- Pete Manena Road
- Bayou D'Inde Pass
- Prater Road
- Coach Williams Drive/J Clophus Road
- Anthony Ferry/ High Hope Road
- Dunn Ferry/ Bankens Road/
Sutherland Road
- Mike Hooks Road/ Miller Avenue/
Landry Street

Any closure of La 378, between IH 10 and La 379 (Sulphur Ave/ OST), is expected to divert significant traffic volume to PPG Drive, Trousdale Road and Old Spanish Trail (OST). These additional volumes would likely lead to substantial delays and potential safety issues along the corridor. Existing intersection control and railroad operations will magnify the delay and safety issues associated with the diversion of traffic during construction and closures.

Additionally, it is requested that Pete Manena Road be extended approximately 4,500 lf northeasterly to connect with the western termini of the IH 10 South Service Road. This extension would provide direct access to IH 10 (Exit 26), supporting Mike Hooks Road/Miller Avenue/Landry Street.

Your consideration is appreciated.

Sincerely,



John S. Bruce, PE

Parish Engineer
Calcasieu Parish

JSB/egs

Cc: Bryan Beam, Parish Administrator
Allen Wainwright, PE, Director, Dept of Engineering and Public Works

Scot Tyler
General Manager
Lake Charles Refinery

PHILLIPS 66
2200 Old Spanish Trail
Westlake, LA 70669



December 28, 2022

Via U.S. Mail and Email at CalcasieuBridge@hntb.com

I-10 Calcasieu River Bridge Project
c/o HNTB Corporation
10000 Perkins Rowe, Suite 640
Baton Rouge, LA 70810

Re: Written Comments to the December 13, 2022 Open House
Public Meeting, I-10 Calcasieu River Bridge Improvements,
State Project No. H.003931

To Whom It May Concern:

I am writing on behalf of Phillips 66 Company to provide comments on the information presented in the Draft Environmental Impact Statement (DEIS) and at the December 13, 2022 Open House Public Meeting for the I-10 Calcasieu River Bridge Improvements Project. I ask that this letter and attachments be included in the official public meeting transcript and record.

As you know, Phillips 66 owns and operates facilities that will be directly affected by potential changes to the I-10 Calcasieu River Bridge. The company fully supports thoughtful improvements to the Calcasieu River crossing, which should greatly benefit the public. In these comments, we provide LADOTD with updated EDC remediation information and current site conditions. We also point out statements made in the DEIS that we believe to be incorrect and provide accurate information.

Phillips 66 has continuously remediated the site and monitored the EDC attenuation in the groundwater. Attachment 1 shows the estimated distribution of EDC in groundwater as of the Fourth Quarter 2020 along with depictions of monitoring results from 2015-2020. The site conditions improved dramatically from 2015 through 2020 and continue to improve. The most up-to-date data shows that the project can proceed in accordance with traditional bridge design and construction methods. There are no site conditions or environmental impacts that require a re-design to avoid the EDC area.

P66 Comments on Draft Environmental Impact Statement

Section 3.8.4 Sole Source Aquifer

1. LADOTD Statement -- "... Subsurface activities ... have the potential to puncture the confining clay layer creating a point of recharge that might introduce contaminants into the aquifer."

P66 Comment #1 – As per LADOTD’s statement on p. 3-80 that the upper limits of the Chicot aquifer occur at approximately 120 feet below ground surface, there is no indication of any plans to advance pilings beyond approximately 75 feet below ground surface, so it is unlikely that subsurface activities will introduce contaminants into the aquifer.

Further, LDEQ has issued piling depth guidelines for the areas north and south of I-10 as shown in Attachment 2 to these Comments. The project can safely proceed in accordance with those guidelines. As the project advances and precise piling locations are determined, Phillips 66 will work cooperatively with LDEQ and LADOTD to ensure that the bridge construction activities are done safely and without added risk to the Chicot aquifer.

Section 3.12.2 EDC Site History

2. LADOTD Statement – The 1987 release occurred near the intersection of the I-10 Service Road and Mike Hooks Road.

P66 Comment #2 – The release occurred at Tank 415, located inside P66 facility and ~0.25 miles from the stated intersection, and did not impact LADOTD right-of-way (ROW) or areas within the new proposed project footprint.

3. LADOTD Statement – The location and 2016 extent of the EDC contamination are illustrated on Figure 4.

P66 Comment #3a – Unable to locate “Figure 4” illustrating the location and 2016 extent of EDC contamination.

P66 Comment #3b – Since LADOTD uses 2021 data to depict the EDC and Vinyl Chloride plumes in the Appendix O figures, consider updating “Figure 4” to depict the 2021 extent of EDC contamination so that the most current data is presented to the public.

4. LADOTD Statement – “...but as demonstrated by detection of EDC in the Upper Chicot Aquifer after the 1987 and 1994 releases, the clay layer is not impervious.

P66 Comment #4 -- There have been no confirmed detections of EDC above the RECAP GW_SS in the Upper Chicot Aquifer beneath LADOTD ROW or planned ROW acquisition for the new I-10 bridge and access roads.

5. LADOTD Statement – Many of the samples collected from ongoing sampling events, including samples taken from borings within the ROW, exceeded the site-specific standards for EDC.

P66 Comment #5 – This statement is accurate only for samples collected south of I-10; however, this statement is not accurate for any monitoring wells sampled north of I-10 (in the path of the proposed bridge and elevated ramps). All groundwater samples collected from monitoring wells north of I-10 meet the site-specific RECAP standard for EDC. This includes quarterly data collected over a +10-year period (2011-2022).

6. LADOTD Statement – After site-specific RECAP standards were established, a groundwater recovery system was installed to intercept and remove free product and contaminated groundwater in the area.

P66 Comment #6 – This statement is incorrect. The groundwater recovery system was installed in 1995 as part of the cleanup response for the 1994 release and has been operated and monitored under LADEQ Compliance Order No. WE-C-96-0011 (1996) and the Corrective Action Plan (1999). The groundwater recovery system was expanded in 2010 to address impacts beneath LADOTD ROW (Ditch 5 and beneath I-10) that were identified during the 2007 investigations. The site-specific RECAP cleanup standards for EDC in groundwater were approved by the LADEQ in 2013. The site-specific RECAP standards have been satisfied for all areas north of I-10.

7. LADOTD Statement – ..., groundwater contamination above the RECAP standard is believed to still be present within LADOTD ROW north of I-10 as deep as 80 feet bgs, within the base of the LIU.

P66 Comment #7 – P66 notes that a more accurate statement would be “groundwater contamination above the RECAP screening standard, but below the site-specific RECAP standard, is believed...”.

8. LADOTD Statement – Additional borings for sampling are currently being installed to the northwest to identify possible migration of contaminants in this direction.

P66 Comment #8 – LADOTD has completed the proposed borings needed for delineation to the northwest. Many of the additional borings noted (22 of 36 borings) were completed in 3Q/4Q 2021. The borings located west/northwest of our western-most monitoring well clusters in the marsh were non-detect for EDC (based on P66 split-sample analysis).

Section 3.12.7 Groundwater Plume

9. LADOTD Statement – If, as suggested by the potentiometric data, the groundwater flows to the northwest, areas not previously sampled could contain EDC in the soils and groundwater and impact or be impacted by the I-10 Calcasieu River Bridge Improvements Project. Additional borings are currently being installed to collect data from areas northwest of the source/plume area.

P66 Comment #9 – There are no data to support this claim. In fact, there are data (held by the LADOTD with P66 split samples) showing this assumption to be incorrect. P66 split sample data from LADOTD’s 3Q/4Q 2021 borings confirmed EDC detections below the site-specific RECAP standard in the vicinity of UIU and LIU monitoring wells that have historically had detections of EDC below the site-specific RECAP standard in the area we refer to as the “EDC slug”. LADOTD also completed two clusters of borings in the UIU/LIU on the east side of Sampson Street, northwest of the marsh, and P66 split sample data were non-detect for EDC.

Appendix O

10. Figures of EDC and Vinyl Chloride Plumes based on 2020 and 2021 Data
Figure C-2, C-3, C-5

P66 Comment #10 – Soil data is from 2009 before groundwater recovery was initiated in the Ditch 5 area and beneath I-10 and likely represent the high mark of historic concentrations. As mentioned in the DRAFT EIS, EDC is not prone to adhering to soil or suspended particulates in groundwater. These data likely reflect dissolved EDC in groundwater within the soil pore space. As such, concentrations are certainly lower today after +10 years of groundwater remediation in this area.

11. Figure 2 – 1Q20 LIU

P66 Comment #11 – EDC plume is depicted incorrectly. EDC does not exceed 0.005 mg/L at MW-41LI or MW-44LI, yet these wells are included within the plume boundary. A more accurate depiction would be the plume boundary centered around MW-48LI. See Attachment 1 to these Comments for a more accurate depiction.

12. Figure 3 – 1Q20 UIU

P66 Comment #12 – This Figure is not accurate and is misleading. There is no reasonable basis to connect the two limited areas of detection when there is intervening monitoring well data that are below screening standard. See Attachment 1 to these Comments for a more accurate depiction.

13. Figure 8 – 3Q20 LIU, Figure 11 – 4Q20 LIU, Figure 14 – 1Q21 LIU, Figure 17 – 2Q21

P66 Comment #13 – This Figure is not accurate and is misleading. There is no reasonable basis to connect the two limited areas of detection when there is intervening monitoring well data that are below screening standard. See Attachment 1 to these Comments for a more accurate depiction.

14. Figure 9 – 3Q20 UIU

P66 Comment #14 – This Figure is not accurate and is misleading. There is no reasonable basis to connect the two limited areas of detection when there is intervening monitoring well data that are below screening standard. See Attachment 1 to these Comments for a more accurate depiction.

In accordance with the NEPA process, Phillips 66 requests that its input be considered and LADOTD's statements in the Final Environmental Impact Statement be modified based on these comments.

Very truly yours,

A handwritten signature in black ink that reads "Scot A. Tyler". The signature is written in a cursive, flowing style.

Scot A. Tyler

ATTACHMENT 1

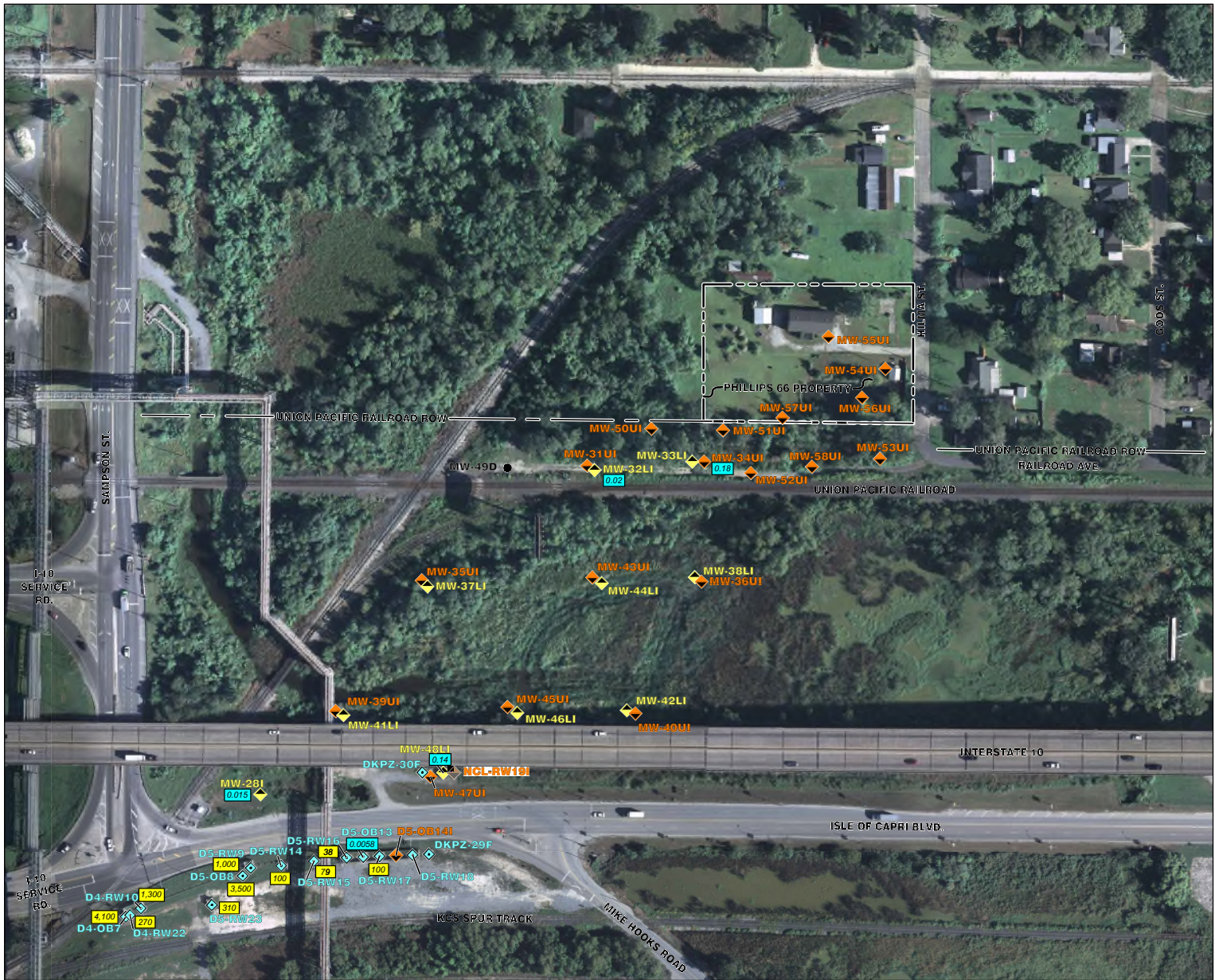
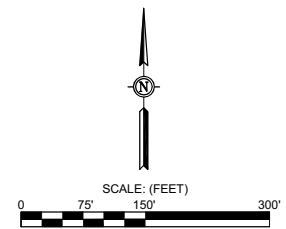


Photo Reference: Gulf Coast Aerial Mapping Co., Inc. Baton Rouge, La. Image Date: 09/2015.

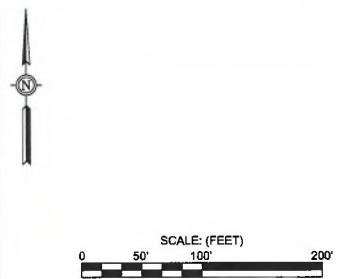
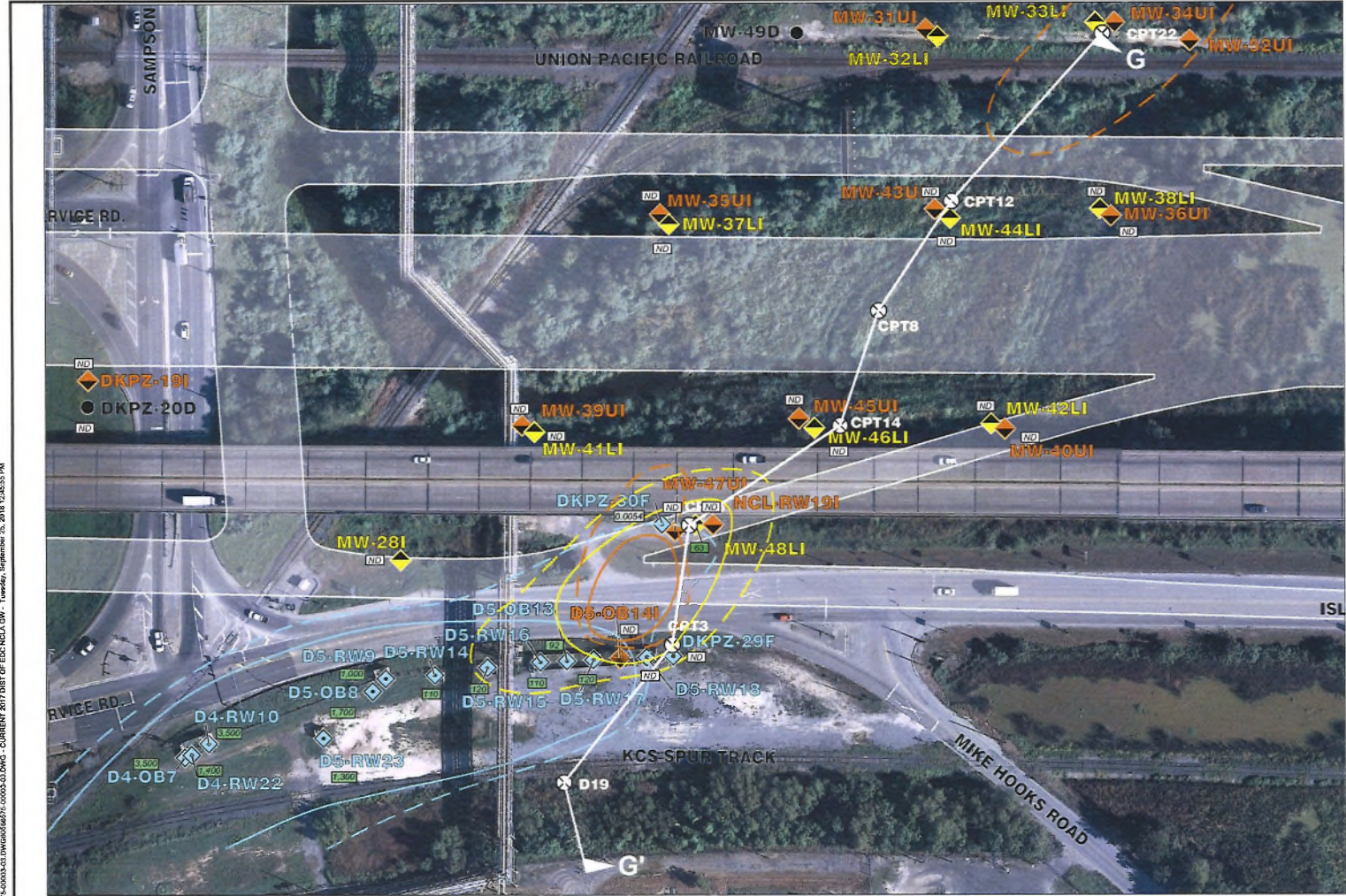


- LEGEND:**
- ◆ UPPER INTERBEDDED RECOVERY/MONITOR WELLS
 - ◆ LOWER INTERBEDDED RECOVERY/MONITOR WELLS
 - ◆ OUT OF SERVICE UPPER INTERBEDDED RECOVERY WELL
 - ◆ 40-FOOT SAND RECOVERY/MONITOR WELL
 - UPPER CHICOT AQUIFER
 - 38 EDC CONCENTRATIONS IN mg/L
 - DETECTED CONCENTRATION ABOVE THE GROUNDWATER MO-1 RECAP STANDARD
 - DETECTED CONCENTRATION BELOW THE GROUNDWATER MO-1 RECAP STANDARD, BUT ABOVE RECAP SCREENING STANDARDS
- NOTE:
WELLS WITH NO DETECTION OF EDC DO NOT HAVE A DATA BOX.



FOURTH-QUARTER 2020 DISTRIBUTION OF EDC IN THE NORTH CLOONEY LOOP AREA GROUNDWATER

AECOM
7389 Florida Blvd., Suite 300
Baton Rouge, Louisiana 70806
225/922-5700



**ESTIMATED DISTRIBUTION
OF EDC IN THE NORTH
CLOONEY LOOP AREA
GROUNDWATER 2017**



NOTES:
 BRIDGE CONSTRUCTION
 SUB-ALTERNATIVE F, PBA-1
 (ESTIMATED LIMITS BASED ON
 LDOTD SCHEMATICS)

- LEGEND:**
- 40-FOOT SAND RECOVERY/MONITOR WELLS (SCREENED FROM 24.79' bgs TO 41.5' bgs)
 - UPPER INTERBEDDED RECOVERY/MONITOR WELLS (SCREENED FROM 44.84' bgs TO 64.84' bgs)
 - LOWER INTERBEDDED RECOVERY/MONITOR WELLS (SCREENED FROM 64.0' bgs TO 84.84' bgs)
 - UPPER CHICOT AQUIFER MONITOR WELLS (SCREENED FROM 128' bgs TO 140' bgs)
 - CPT/BORING USED FOR CROSS SECTION
 - CROSS SECTION LOCATION
 - BOXES SHOW DETECTED EDC CONCENTRATIONS IN mg/L
 - NON-DETECT
 - DETECTED CONCENTRATION BELOW THE GROUNDWATER LIMITING RECAP STANDARD, BUT ABOVE RECAP SCREENING STANDARD
 - DETECTED CONCENTRATION ABOVE THE GROUNDWATER LIMITING RECAP STANDARD

- ESTIMATED EXTENT OF EDC EXCEEDING THE GW LIMITING RECAP STANDARD OF 0.43 MG/L IN THE 40-FOOT SAND
- ESTIMATED EXTENT OF EDC EXCEEDING THE RECAP SCREENING STANDARD OF 0.005 MG/L IN THE 40-FOOT SAND
- ESTIMATED EXTENT OF EDC EXCEEDING THE GW LIMITING RECAP STANDARD OF 3.0 MG/L IN THE UPPER INTERBEDDED UNIT
- ESTIMATED EXTENT OF EDC EXCEEDING THE RECAP SCREENING STANDARD OF 0.005 MG/L IN THE UPPER INTERBEDDED UNIT
- ESTIMATED EXTENT OF EDC EXCEEDING THE GW LIMITING RECAP STANDARD OF 1.5 MG/L IN THE LOWER INTERBEDDED UNIT
- ESTIMATED EXTENT OF EDC EXCEEDING THE RECAP SCREENING STANDARD OF 0.005 MG/L IN THE LOWER INTERBEDDED UNIT

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Photo Reference: Gulf Coast Aerial Mapping Co., Inc. Baton Rouge, La. Image Date: 09/2015.

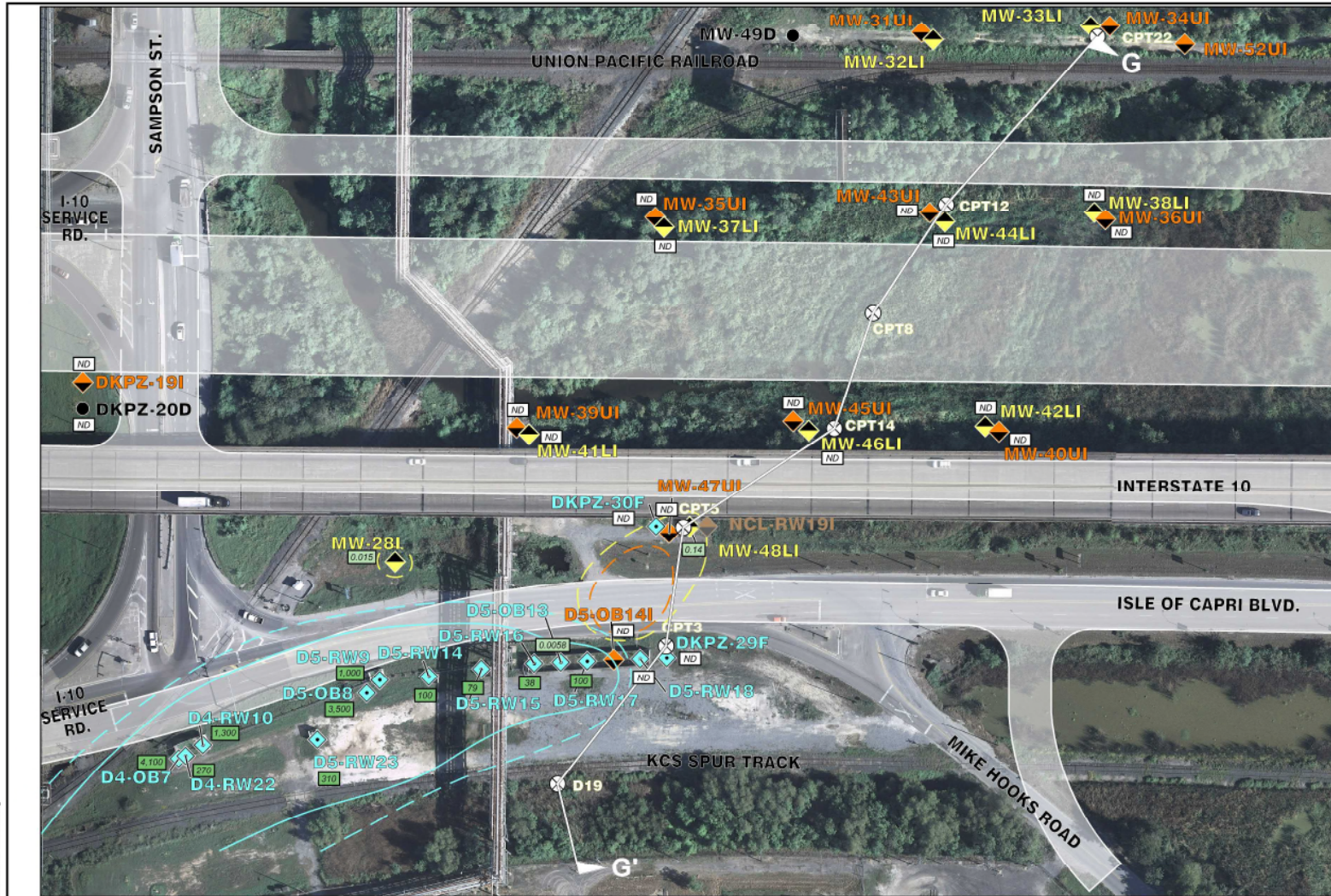


Photo Reference: Gulf Coast Aerial Mapping Co., Inc. Baton Rouge, La. Image Date: 09/2015.

LEGEND:

- ◆ 40-FOOT SAND RECOVERY/MONITOR WELLS (SCREENED FROM 24.79' bgs TO 41.5' bgs)
- ◆ UPPER INTERBEDDED RECOVERY/MONITOR WELLS (SCREENED FROM 44.84' bgs TO 64.84' bgs)
- ◆ LOWER INTERBEDDED RECOVERY/MONITOR WELLS (SCREENED FROM 64.0' bgs TO 84.84' bgs)
- ◆ OUT OF SERVICE UPPER INTERBEDDED RECOVERY WELLS
- UPPER CHICOT AQUIFER MONITOR WELLS (SCREENED FROM 128' bgs TO 140' bgs)
- ⊗ CPT/BORING USED FOR CROSS SECTION

CROSS SECTION LOCATION

BOXES SHOW DETECTED EDC CONCENTRATIONS IN mg/L

- ND NON-DETECT
- DETECTED CONCENTRATION BELOW THE GROUNDWATER LIMITING RECAP STANDARD, BUT ABOVE RECAP SCREENING STANDARD
- DETECTED CONCENTRATION ABOVE THE GROUNDWATER LIMITING RECAP STANDARD

- ESTIMATED EXTENT OF EDC EXCEEDING THE GW LIMITING RECAP STANDARD OF 0.43 MG/L IN THE 40-FOOT SAND
- ESTIMATED EXTENT OF EDC EXCEEDING THE RECAP SCREENING STANDARD OF 0.005 MG/L IN THE 40-FOOT SAND
- ESTIMATED EXTENT OF EDC EXCEEDING THE RECAP SCREENING STANDARD OF 0.005 MG/L IN THE UPPER INTERBEDDED UNIT
- ESTIMATED EXTENT OF EDC EXCEEDING THE RECAP SCREENING STANDARD OF 0.005 MG/L IN THE LOWER INTERBEDDED UNIT

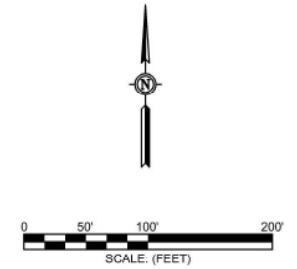
NOTES:

BRIDGE CONSTRUCTION SUB-ALTERNATIVE G, PBA-5 (ESTIMATED LIMITS BASED ON LDOT SCHEMATICS)

DATA SOURCES:

QUARTERLY DATA SUBMITTAL, FOURTH QUARTER 2020 MONITORING EVENT, SUBMITTED TO LDEQ ON JANUARY 8, 2021.

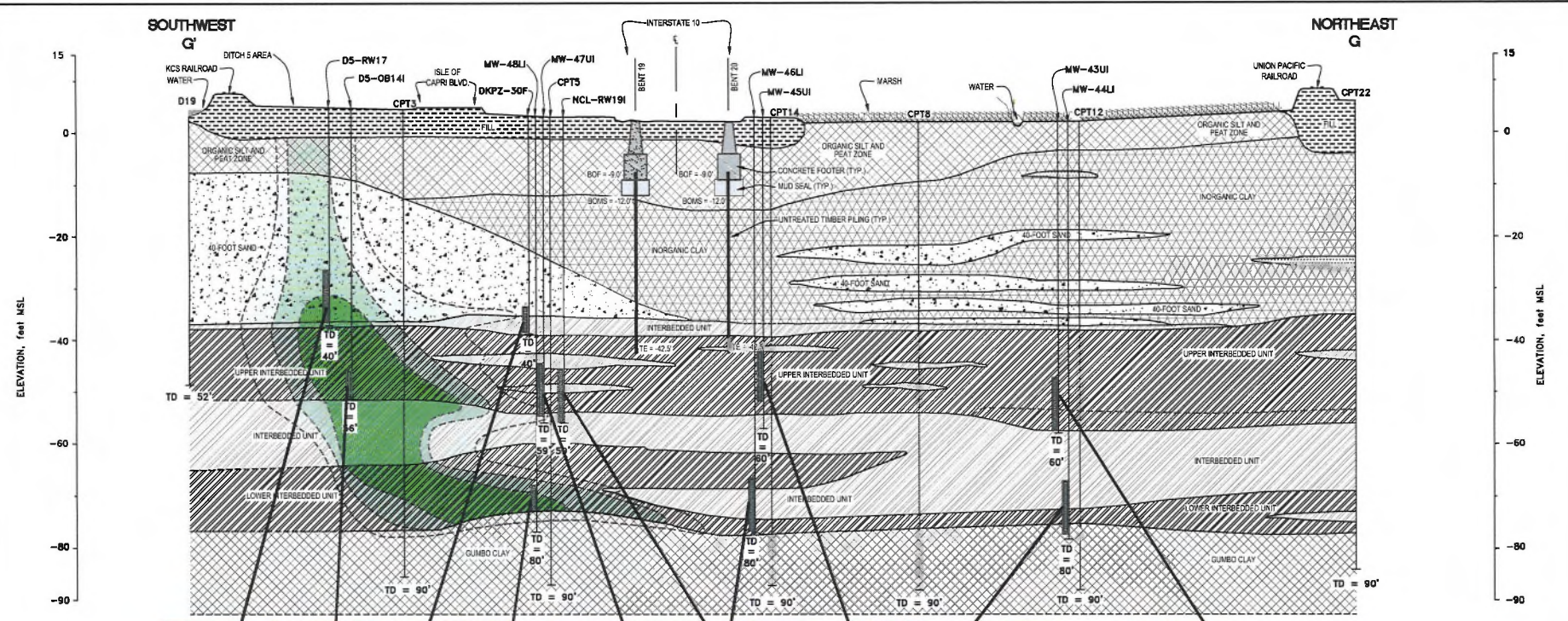
FIRST HALF 2020 SEMI-ANNUAL EDC GROUNDWATER REMEDIAL MEASURES STATUS REPORT, SUBMITTED TO LDEQ ON AUGUST 31, 2020.



AECOM
 9555 United Plaza Blvd., Suite 300
 Baton Rouge, Louisiana 70809
 225/922-5700

ESTIMATED DISTRIBUTION OF EDC IN THE NORTH CLOONEY LOOP AREA GROUNDWATER 2020

I:\Projects\CA10191\1910600000000000000\AerialMap\Figure10205-Edc_Dist_EDC_MG_A2019_Aug



LEGEND

- MONITOR/RECOVERY WELL SCREENED INTERVAL
- CONCRETE FOOTING
- MUD SEAL
- UNTREATED TIMBER PILE

TD = DEPTH BELOW GROUND SURFACE
 BOF = BOTTOM OF FOOTER
 BOMS = BOTTOM OF MUD SEAL
 TE = TIP ELEVATION OF PILING (MULTIPLE PILING ARE INSTALLED TO THE SHOWN TIP ELEVATION BENEATH EACH CONCRETE FOOTING.)
 ξ = CENTERLINE OF INTERSTATE 10

DS-RW17 (mg/L)		DS-OB14I (mg/L)		DKPZ-30F (mg/L)		MW-48LI (mg/L)		MW-47UI (mg/L)		NCL-RW19I (mg/L)		MW-46LI (mg/L)		MW-45UI (mg/L)		MW-43UI (mg/L)		MW-44LI (mg/L)		MW-41LI (mg/L)	
DATE	EDC C/W	DATE	EDC C/W	DATE	EDC C/W	DATE	EDC C/W	DATE	EDC C/W	DATE	EDC C/W	DATE	EDC C/W	DATE	EDC C/W	DATE	EDC C/W	DATE	EDC C/W	DATE	EDC C/W
3/20/16	289	3/20/16	310	3/20/16	ND	3/20/16	ND	3/20/16	ND	3/20/16	ND	3/20/16	ND	3/20/16	ND	3/20/16	ND	3/20/16	ND	3/20/16	ND
5/20/16	31	5/20/16	270	5/20/16	ND	5/20/16	74	5/20/16	ND	5/20/16	0.0059	5/20/16	ND	5/20/16	ND	5/20/16	ND	5/20/16	ND	5/20/16	1.2
8/7/2016	17	7/20/16	270	7/20/16	ND	7/20/16	43	7/20/16	0.214	7/20/16	ND	7/20/16	ND	7/20/16	ND	7/20/16	ND	7/20/16	ND	7/20/16	0.32
8/24/2016	23	10/20/16	270	10/20/16	0.38	10/20/16	43	10/20/16	0.276	10/20/16	0.011	10/20/16	ND	10/20/16	ND	10/20/16	ND	10/20/16	ND	10/20/16	0.968
7/20/16	130	12/20/16	130	12/20/16	ND	1/20/16	110	1/20/16	0.228	1/20/16	0.013	1/20/16	ND	1/20/16	ND	1/20/16	ND	1/20/16	ND	1/20/16	0.281
10/20/16	300	4/20/16	170	4/20/16	ND	4/20/16	233	4/20/16	0.19	4/20/16	ND	4/20/16	ND	4/20/16	ND	4/20/16	ND	4/20/16	ND	4/20/16	0.029
10/20/16	279	10/20/16	110/126	7/20/16	ND	7/20/16	270	7/20/16	ND	7/20/16	ND	7/20/16	ND	7/20/16	ND	7/20/16	ND	7/20/16	ND	7/20/16	0.1
10/20/16	11	10/20/16	65	10/20/16	0.008	10/20/16	220	10/20/16	0.25	10/20/16	ND	10/20/16	ND	10/20/16	ND	10/20/16	ND	10/20/16	ND	10/20/16	ND
10/20/16	63	10/20/16	200	2/20/17	ND	1/20/17	133	2/20/17	0.1	2/20/17	ND	2/20/17	ND	2/20/17	ND	2/20/17	ND	2/20/17	ND	2/20/17	ND
10/20/16	33	4/20/17	0.018	4/20/17	ND	4/20/17	87	4/20/17	ND	4/20/17	ND	4/20/17	ND	4/20/17	ND	4/20/17	ND	4/20/17	ND	4/20/17	ND
2/20/17	173	7/20/17	ND	7/20/17	0.19	7/20/17	10	7/20/17	0.283	7/20/17	ND	7/20/17	ND	7/20/17	ND	7/20/17	ND	7/20/17	ND	7/20/17	ND
4/20/17	173	10/20/17	ND	10/20/17	0.0084	10/20/17	63	10/20/17	ND	10/20/17	ND	10/20/17	ND	10/20/17	ND	10/20/17	ND	10/20/17	ND	10/20/17	ND
4/20/17	4.65	10/20/17	120																		

BOXES SHOW DETECTED EDC CONCENTRATIONS IN mg/L

- NOT DETECTED (ND) - RECAP SCREENING STANDARD (mg/L)
- RECAP SCREENING STANDARD - LIMITING RECAP STANDARD (mg/L)
- LIMITING RECAP STANDARD - 10 (mg/L)
- >10 (mg/L)

THE LIMITING RECAP STANDARDS:

- 40-FOOT SAND - 0.43 mg/L
- UPPER INTERBEDDED UNIT - 3.0 mg/L
- LOWER INTERBEDDED UNIT - 1.5 mg/L

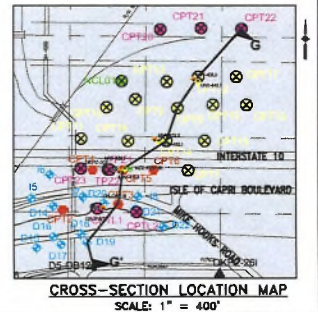
- 40-FOOT SAND MONITOR OR RECOVERY WELL
- UPPER INTERBEDDED UNIT MONITOR OR RECOVERY WELL
- LOWER INTERBEDDED UNIT MONITOR OR RECOVERY WELL

HORIZONTAL SCALE: 1" = 80'
 VERTICAL SCALE: 1" = 20'
 SURFACE FEATURES NOT TO SCALE

NOTES:

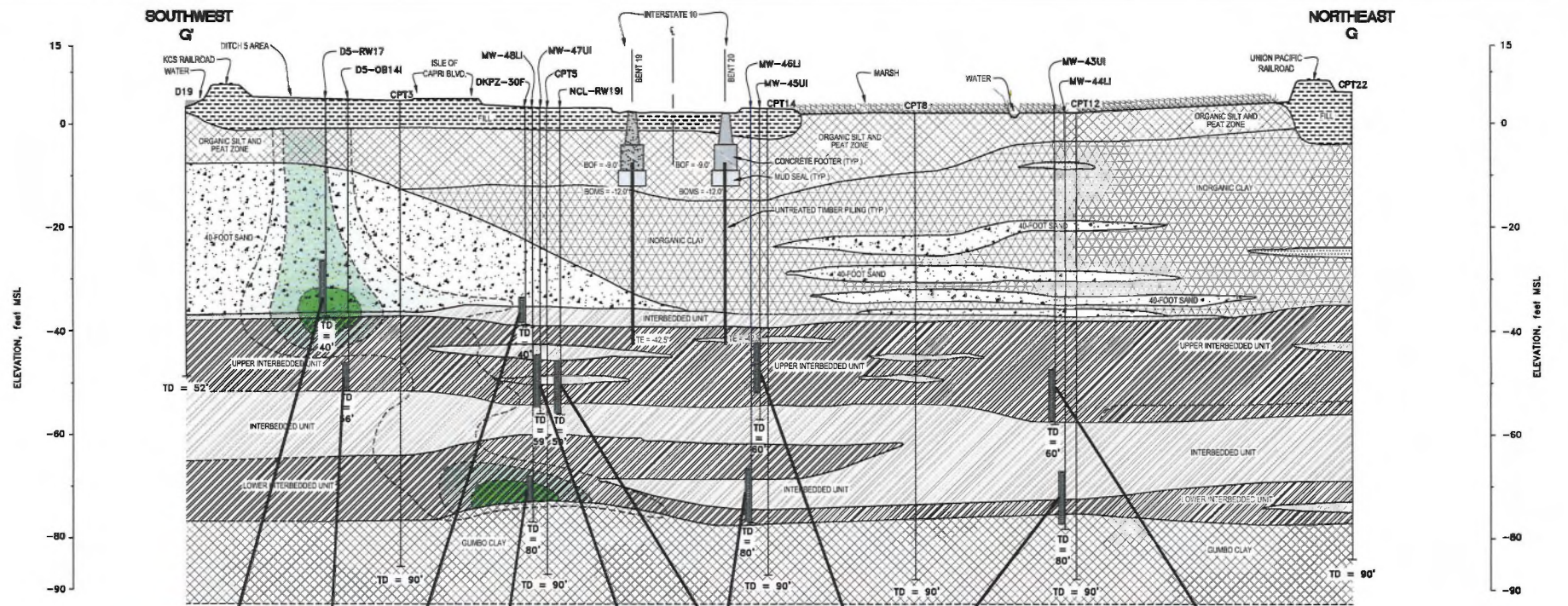
- RECOVERY WELL AND MONITOR WELL LOCATIONS ARE PROJECTED ONTO THE CROSS SECTION
- DEPICTED SUBSURFACE STRUCTURES AT BENT 19 AND BENT 20 ARE TYPICAL AND ARE BASED ON STATE PROJECT NO. 003-30-02 SUMMARY OF PILING DATED SEPTEMBER 20, 1949. SEE REFERENCED STATE PROJECT FOR DETAILED DRAWINGS OF EXISTING SUBSURFACE STRUCTURES.
- THE CPT's ON THE CROSS-SECTIONS TERMINATED WITHIN THE GUMBO CLAY, BASED ON DEEPER BORINGS IN THE AREA, THE GUMBO CLAY IS ESTIMATED TO BE IN THE RANGE OF 35 AND 45 FEET THICK IN THE AREA.

ELEVATION AND THICKNESS OF SUBSURFACE STRATA ARE DEPICTED AT THE LOCATIONS OF BORINGS SHOWN ON THE FIGURE AND ARE INTERPOLATED BETWEEN SOIL BORINGS. SUBSURFACE CONDITIONS MAY VARY. ANY USE OF THIS INFORMATION SHOULD INCORPORATE APPROPRIATE PROFESSIONAL STANDARDS OF CARE.



CROSS-SECTION G-G'
 ESTIMATED DISTRIBUTION OF EDC IN THE NORTH CLOONEY LOOP AREA GROUNDWATER (2015-2017)

I:\Projects\CADD\ConocoPhillips\00003\60566575\00003-05.dwg



D5-RW17 (mg/L)		D5-OB14I (mg/L)		DKPZ-30F (mg/L)		MW-48LI (mg/L)		MW-47UI (mg/L)		MW-46LI (mg/L)		MW-45UI (mg/L)		MW-44LI (mg/L)		MW-43UR (mg/L)	
DATE	EDC GW	DATE	EDC GW	DATE	EDC GW	DATE	EDC GW	DATE	EDC GW	DATE	EDC GW	DATE	EDC GW	DATE	EDC GW	DATE	EDC GW
3/29/16	28	3/29/16	310	3/29/16	ND	3/29/16	ND	3/29/16	ND	3/29/16	ND	3/29/16	ND	3/29/16	ND	3/29/16	ND
5/24/16	21	5/24/16	290	5/24/16	ND	5/24/16	ND	5/24/16	ND	5/24/16	ND	5/24/16	ND	5/24/16	ND	5/24/16	ND
9/7/2016	27	9/7/2016	210	9/7/2016	ND	9/7/2016	ND	9/7/2016	ND	9/7/2016	ND	9/7/2016	ND	9/7/2016	ND	9/7/2016	ND
1/20/16	130	1/20/16	310	1/20/16	0.36	1/20/16	ND	1/20/16	ND	1/20/16	ND	1/20/16	ND	1/20/16	ND	1/20/16	ND
10/29/15	290	10/29/15	310	10/29/15	ND	10/29/15	ND	10/29/15	ND	10/29/15	ND	10/29/15	ND	10/29/15	ND	10/29/15	ND
5/20/16	210	5/20/16	110/120	5/20/16	ND	5/20/16	ND	5/20/16	ND	5/20/16	ND	5/20/16	ND	5/20/16	ND	5/20/16	ND
7/20/16	63	7/20/16	52	7/20/16	ND	7/20/16	ND	7/20/16	ND	7/20/16	ND	7/20/16	ND	7/20/16	ND	7/20/16	ND
10/20/16	88	10/20/16	0.918	10/20/16	ND	10/20/16	ND	10/20/16	ND	10/20/16	ND	10/20/16	ND	10/20/16	ND	10/20/16	ND
8/20/17	110	8/20/17	ND	8/20/17	ND	8/20/17	ND	8/20/17	ND	8/20/17	ND	8/20/17	ND	8/20/17	ND	8/20/17	ND
4/20/17	126	4/20/17	ND	4/20/17	ND	4/20/17	ND	4/20/17	ND	4/20/17	ND	4/20/17	ND	4/20/17	ND	4/20/17	ND
10/20/17	0-80	10/20/17	ND	10/20/17	ND	10/20/17	ND	10/20/17	ND	10/20/17	ND	10/20/17	ND	10/20/17	ND	10/20/17	ND
10/20/17	520	10/20/17	520	10/20/17	ND	10/20/17	ND	10/20/17	ND	10/20/17	ND	10/20/17	ND	10/20/17	ND	10/20/17	ND

LEGEND

- MONITOR/RECOVERY WELL SCREENED INTERVAL
- CONCRETE FOOTING
- MUD SEAL
- UNTREATED TIMBER PILE
- TD = DEPTH BELOW GROUND SURFACE
- BOF = BOTTOM OF FOOTER
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- TE = TIP ELEVATION OF PILING (MULTIPLE PILING ARE INSTALLED TO THE SHOWN TIP ELEVATION BENEATH EACH CONCRETE FOOTING.)
- ℄ = CENTERLINE OF INTERSTATE 10

BOXES SHOW DETECTED EDC CONCENTRATIONS IN mg/L.

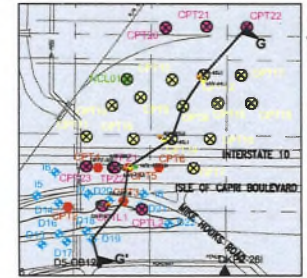
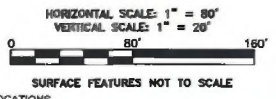
- NOT DETECTED (ND) - RECAP SCREENING STANDARD (mg/L)
- RECAP SCREENING STANDARD - LIMITING RECAP STANDARD (mg/L)
- LIMITING RECAP STANDARD - 10 (mg/L)
- >10 (mg/L)

THE LIMITING RECAP STANDARDS:

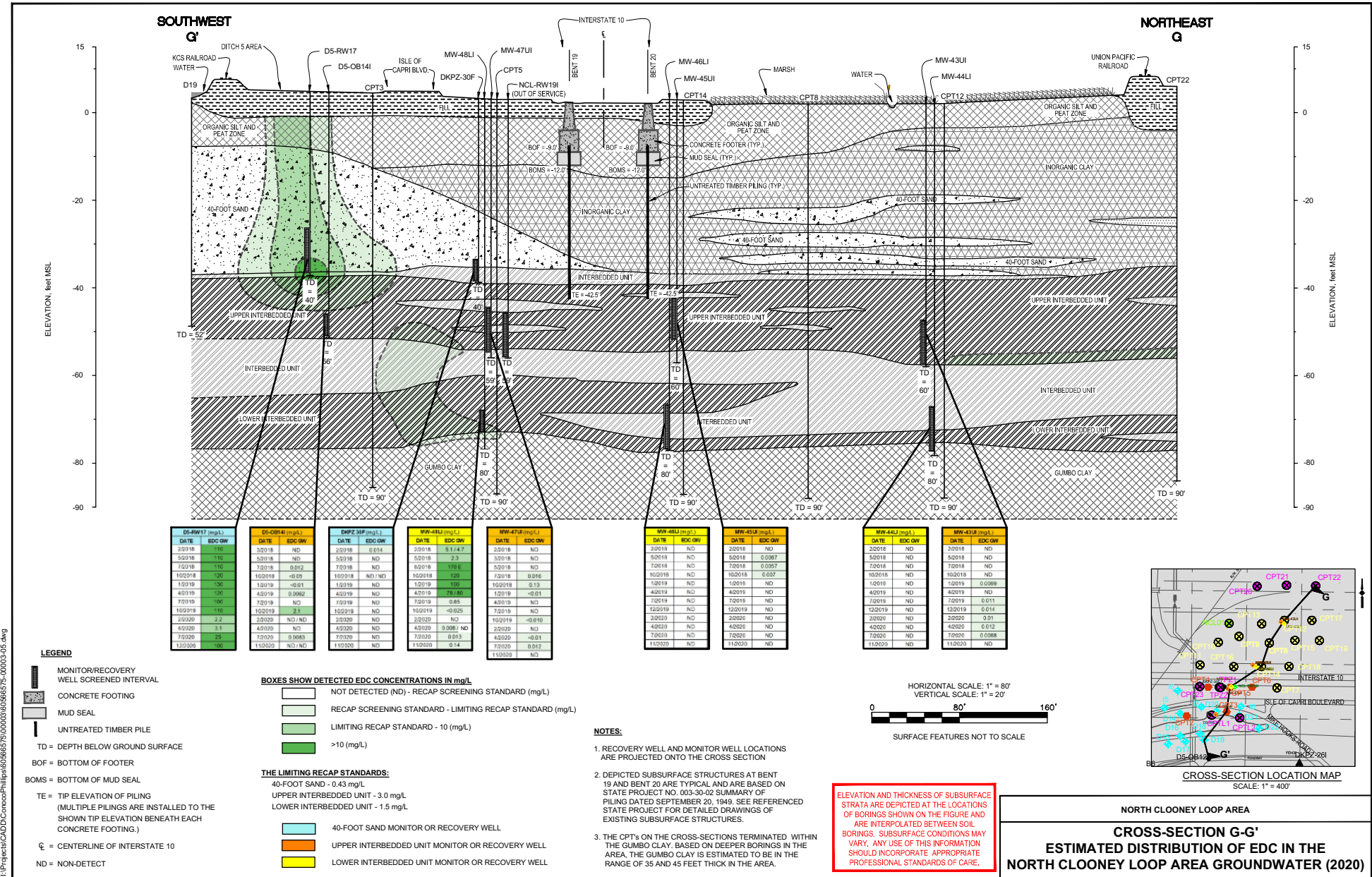
- 40-FOOT SAND - 0.43 mg/L
- UPPER INTERBEDDED UNIT - 3.0 mg/L
- LOWER INTERBEDDED UNIT - 1.5 mg/L
- 40-FOOT SAND MONITOR OR RECOVERY WELL
- UPPER INTERBEDDED UNIT MONITOR OR RECOVERY WELL
- LOWER INTERBEDDED UNIT MONITOR OR RECOVERY WELL

NOTES:

1. RECOVERY WELL AND MONITOR WELL LOCATIONS ARE PROJECTED ONTO THE CROSS SECTION
2. DEPICTED SUBSURFACE STRUCTURES AT BENT 19 AND BENT 20 ARE TYPICAL AND ARE BASED ON STATE PROJECT NO. 003-30-02 SUMMARY OF PILING DATED SEPTEMBER 20, 1949. SEE REFERENCED STATE PROJECT FOR DETAILED DRAWINGS OF EXISTING SUBSURFACE STRUCTURES.
3. THE CPT'S ON THE CROSS-SECTIONS TERMINATED WITHIN THE GUMBO CLAY. BASED ON DEEPER BORINGS IN THE AREA, THE GUMBO CLAY IS ESTIMATED TO BE IN THE RANGE OF 35 AND 45 FEET THICK IN THE AREA.

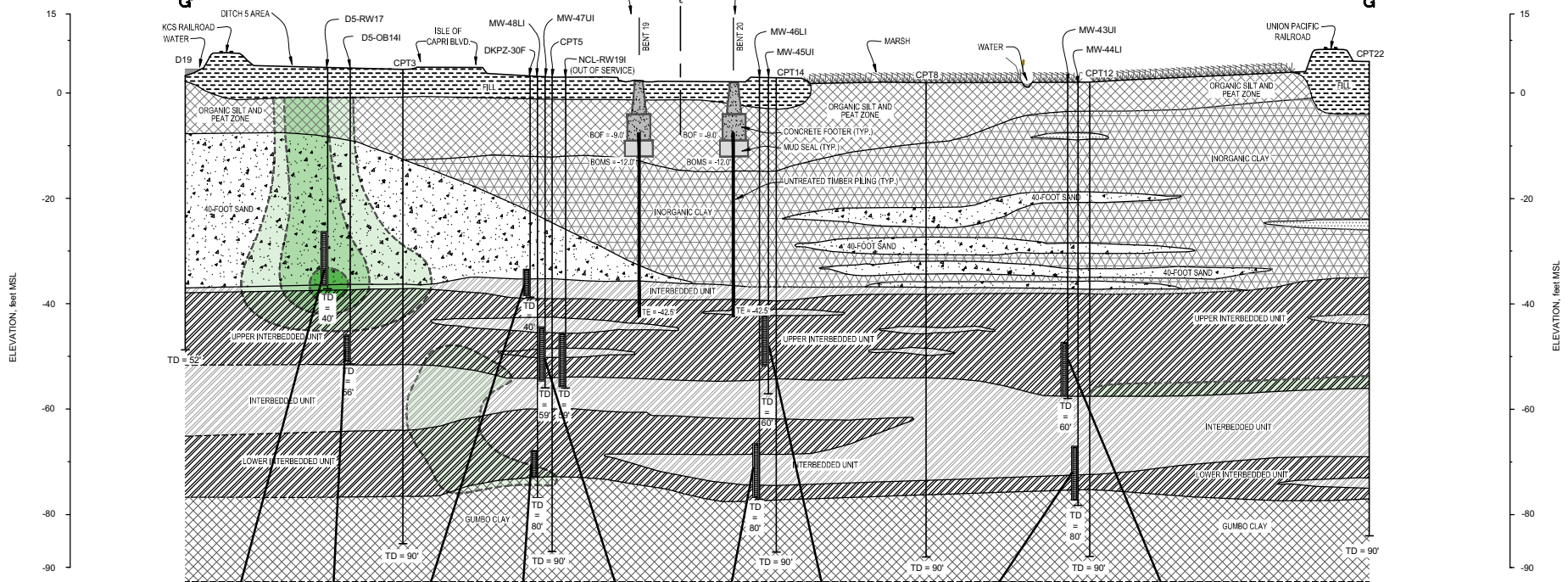


CROSS-SECTION G-G'
ESTIMATED DISTRIBUTION OF EDC IN THE NORTH CLOONEY LOOP AREA GROUNDWATER (2017)



SOUTHWEST
G'

NORTHEAST
G



D5-RW17 (mg/L)		D5-OB141 (mg/L)		DKPZ-30F (mg/L)		MW-48L1 (mg/L)		MW-47UI (mg/L)		MW-46L1 (mg/L)		MW-43UI (mg/L)		MW-44L1 (mg/L)	
DATE	EDC GW	DATE	EDC GW	DATE	EDC GW	DATE	EDC GW	DATE	EDC GW	DATE	EDC GW	DATE	EDC GW	DATE	EDC GW
2/2018	ND	3/2018	ND	2/2018	0.014	2/2018	5.1 / 4.7	2/2018	ND	2/2018	ND	2/2018	ND	2/2018	ND
5/2018	ND	5/2018	ND	5/2018	ND	5/2018	7.3	5/2018	ND	5/2018	ND	5/2018	0.0087	5/2018	ND
7/2018	ND	7/2018	0.014	7/2018	ND	8/2018	170.1	8/2018	ND	8/2018	ND	7/2018	0.0057	7/2018	ND
10/2018	ND	10/2018	<0.05	10/2018	ND / ND	10/2018	ND	7/2018	0.006	10/2018	ND	10/2018	0.007	10/2018	ND
1/2019	ND	1/2019	<0.01	1/2019	ND	1/2019	ND	10/2018	ND	1/2019	ND	1/2019	ND	1/2019	0.0089
4/2019	ND	4/2019	0.0062	4/2019	ND	4/2019	79.0	1/2019	<0.01	4/2019	ND	4/2019	ND	4/2019	ND
7/2019	ND	7/2019	ND	7/2019	ND	7/2019	<0.05	4/2019	ND	7/2019	ND	7/2019	ND	7/2019	0.011
10/2019	ND	10/2019	2.1	10/2019	ND	10/2019	<0.025	7/2019	ND	10/2019	ND	10/2019	ND	10/2019	0.014
2/2020	2.2	2/2020	ND / ND	2/2020	ND	2/2020	ND	10/2019	<0.010	2/2020	ND	2/2020	ND	2/2020	0.31
4/2020	1.1	4/2020	ND	4/2020	ND	4/2020	0.006	2/2020	ND	4/2020	ND	4/2020	ND	4/2020	0.012
7/2020	ND	7/2020	0.0063	7/2020	ND	7/2020	0.013	4/2020	<0.01	7/2020	ND	7/2020	ND	7/2020	0.006
11/2020	ND	11/2020	ND / ND	11/2020	ND	11/2020	0.14	11/2020	ND	11/2020	ND	11/2020	ND	11/2020	ND

LEGEND

- MONITOR/RECOVERY WELL SCREENED INTERVAL
- CONCRETE FOOTING
- MUD SEAL
- UNTREATED TIMBER PILING
- TD = DEPTH BELOW GROUND SURFACE
- BOF = BOTTOM OF FOOTER
- BOMS = BOTTOM OF MUD SEAL
- TE = TIP ELEVATION OF PILING (MULTIPLE PILING ARE INSTALLED TO THE SHOWN TIP ELEVATION BENEATH EACH CONCRETE FOOTING.)
- CL = CENTERLINE OF INTERSTATE 10
- ND = NON-DETECT

BOXES SHOW DETECTED EDC CONCENTRATIONS IN mg/L

- NOT DETECTED (ND) - RECAP SCREENING STANDARD (mg/L)
- RECAP SCREENING STANDARD - LIMITING RECAP STANDARD (mg/L)
- LIMITING RECAP STANDARD - 10 (mg/L)
- >10 (mg/L)

THE LIMITING RECAP STANDARDS:

- 40-FOOT SAND - 0.43 mg/L
- UPPER INTERBEDDED UNIT - 3.0 mg/L
- LOWER INTERBEDDED UNIT - 1.5 mg/L

40-FOOT SAND MONITOR OR RECOVERY WELL
UPPER INTERBEDDED UNIT MONITOR OR RECOVERY WELL
LOWER INTERBEDDED UNIT MONITOR OR RECOVERY WELL

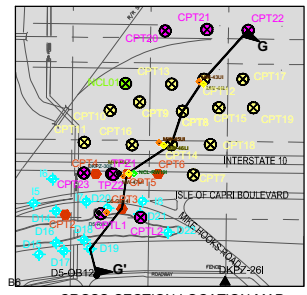
NOTES:

- RECOVERY WELL AND MONITOR WELL LOCATIONS ARE PROJECTED ONTO THE CROSS SECTION
- DEPICTED SUBSURFACE STRUCTURES AT BENT 19 AND BENT 20 ARE TYPICAL AND ARE BASED ON STATE PROJECT NO. 003-30-02 SUMMARY OF PILING DATED SEPTEMBER 20, 1949. SEE REFERENCED STATE PROJECT FOR DETAILED DRAWINGS OF EXISTING SUBSURFACE STRUCTURES.
- THE CPT's ON THE CROSS-SECTIONS TERMINATED WITHIN THE GUMBO CLAY, BASED ON DEEPER BORINGS IN THE AREA, THE GUMBO CLAY IS ESTIMATED TO BE IN THE RANGE OF 35 AND 45 FEET THICK IN THE AREA.

HORIZONTAL SCALE: 1" = 80'
VERTICAL SCALE: 1" = 20'

0 80' 160'

SURFACE FEATURES NOT TO SCALE



CROSS-SECTION G-G'
ESTIMATED DISTRIBUTION OF EDC IN THE NORTH CLOONEY LOOP AREA GROUNDWATER (2020)

ELEVATION AND THICKNESS OF SUBSURFACE STRATA ARE DEPICTED AT THE LOCATIONS OF BORINGS SHOWN ON THE FIGURE AND ARE INTERPOLATED BETWEEN SOIL BORINGS. SUBSURFACE CONDITIONS MAY VARY. ANY USE OF THIS INFORMATION SHOULD INCORPORATE APPROPRIATE PROFESSIONAL STANDARDS OF CARE.

ATTACHMENT 2

BOBBY JINDAL
GOVERNOR



PEGGY M. HATCH
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

June 18, 2010

CERTIFIED – RETURN RECEIPT REQUESTED (7001 0320 0002 6646 3495)

Ms. Cheryl Duvieilh
Executive Counsel
Louisiana Department of Transportation and Development
P.O. Box 94245
Baton Rouge, Louisiana 70804-9245

RE: ConocoPhillips, Inc. – Proposed Construction for the I-10 Bridge Replacement and
Sampson Street Overpass
Clooney Loop Marine Docks Area

Dear Ms. Duvieilh:

This letter revises and clarifies the previous LDEQ correspondences of May 7, 2008 and November 19, 2009, and March 22, 2010.

The location of these planned construction projects is in close proximity to a 1994 discovered release of 1,2-dichloroethane (EDC) at the ConocoPhillips, Inc. (CP) Marine Docks, the remediation of which LDEQ provides regulatory oversight. Representatives of CP, LDEQ, LDOTD, URS, and HNTB (consultant for LDOTD) met regularly throughout 2009 to discuss the analytical results and other findings from CPT's located in the swamp north of I-10. These activities undertaken by CP and included three mobilizations. Analytical data from all 2009 mobilizations was consolidated into a Site Investigation Report, submitted to LDEQ on April 14, 2010. Additionally, ConocoPhillips has proposed an Interim Measures Work Plan (submitted January 15, 2010) and a Monitoring Well Network Installation Plan (submitted April 23, 2010). Both plans have been reviewed by LDEQ and LDOTD, with comments forwarded to CP as necessary.

As previously discussed with the LDOTD, the Federal Highway Administration (FHWA), and ConocoPhillips, there is shared concern about any construction in this area that may exacerbate the current subsurface conditions and concern for the potential for impact to the Chicot Aquifer system (Chicot). Specifically the concern is installation of foundation pilings for the aforementioned highway construction through subsurface zones known to be contaminated primarily with EDC.

Ms. Cheryl Duvieilh
June 18, 2010
Page 2

Preliminary piling locations were transmitted to LDEQ from HNTB on October 19, 2009 via e-mail (figure attached for reference). LDEQ understands that this information is still somewhat tentative. Additional pilings may be required at locations undetermined at this time, and piling locations and depths may change. As previously noted, in the absence of final determinations of piling locations and LDOTD-proposed depths, it is impossible to provide any more specificity in recommending depths which would be protective of the subsurface environment, i.e., avoiding exacerbation of current groundwater conditions. As such the Department views these depths of piling generalizations as guidance and subject to change. However, based on the figure provided as well as all available field data, LDEQ is able to provide the following:

- As per the correspondence from LDEQ to LDOTD dated November 19, 2009, LDEQ would have no objection to piling depths of 75' or less north of the current I-10 footprint. While pilings may be placed within contamination zones, this depth would not penetrate zones currently uncontaminated by EDC.
- South of the current I-10 footprint, no piling should exceed a depth of 40' with the exception of the following: Using a line drawn from CPT18, CPT7, and a point 50' due east of I8 as a reference, there would be no depth restrictions to the east of this line.

It should also be noted that the maximum recommended piling depths given by DEQ would include any and all subsurface-penetrating activities, including those undertaken during geotechnical testing.

As always, we remain committed to working with all parties and agencies in facilitating these projects while protecting the subsurface environment in the Lake Charles/Westlake areas. If you have any questions, please contact Dutch Donlon at (225)-219-3188 or Laura LeBouef at (225)-219-3540.

Sincerely,



Cheryl Sonnier Nolan, Assistant Secretary
Office of Environmental Services

LAD/LQL

c: Imaging Operations – GW



State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL COMPLIANCE

November 5, 2013

Ms. Noel Ardoin, P.E.
Louisiana Department of Transportation and Development
P.O. Box 94245
Baton Rouge, LA 70804-9245

RE: Solicitation of Views
I-10 Calcasieu River Bridge
(AI Number 2538)
Calcasieu Parish

Dear Ms. Ardoin:

The Department of Environmental Quality (LDEQ), has received your request for comments on the above referenced project. After reviewing your request, the Department has no objections based on the information provided in your submittal. For your information, the following general comments have been included.

- Please take any necessary steps to obtain and/or update all necessary approvals and environmental permits regarding this proposed project.
- If your project results in a discharge to waters of the state, submittal of a Louisiana Pollutant Discharge Elimination System (LPDES) application may be necessary.
- If the project results in a discharge of wastewater to an existing wastewater treatment system, that wastewater treatment system may need to modify its LPDES permit before accepting the additional wastewater.
- All precautions should be observed to control nonpoint source pollution from construction activities. LDEQ has stormwater general permits for construction areas equal to or greater than one acre. It is recommended that you contact the LDEQ Water Permits Division at (225) 219-9371 to determine if your proposed project requires a permit.
- If any of the proposed work is located in wetlands or other areas subject to the jurisdiction of the U.S. Army Corps of Engineers, you should contact the Corps directly regarding permitting issues. If a Corps permit is required, part of the application process may involve a water quality certification from LDEQ.
- All precautions should be observed to protect the groundwater of the region.

Ms. Ardoin
November 5, 2013
Page 2

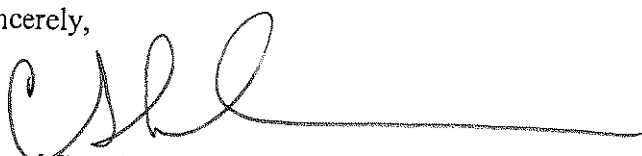
- If any solid or hazardous wastes, or soils and/or groundwater contaminated with hazardous constituents are encountered during the project, notification to LDEQ's Single-Point-of-Contact (SPOC) at (225) 219-3640 is required. Additionally, precautions should be taken to protect workers from these hazardous constituents.

Based on LDEQ's previous involvement in the area potentially impacted by this project, we offer these specific comments:

- In the absence of final determinations of piling locations and LDOTD-proposed depths, it is not possible to provide specificity in recommending depths which would be protective of the subsurface environment, i.e., avoiding exacerbation of current groundwater conditions.
- As per the correspondence from LDEQ to LDOTD dated November 19, 2009, LDEQ would have no objection to piling depths of 75' below current existing grade or less north of the current I-10 footprint. While pilings may be placed within contamination zones, this depth would not penetrate zones currently uncontaminated by EDC.
- South of the current I-10 footprint, no piling should exceed a depth of 40' below current existing grade with the exception of the following: Using a line drawn from CPT18, CPT7, and a point 50' due east of I8 as a reference, there would be no depth restrictions to the east of this line (See EDMS Document ID # 6754900 for reference points).

Please contact Laura LeBouef by phone at (225) 219-3033 or by email at laura.lebouef@la.gov with any further questions or concerns.

Sincerely,



Cheryl Sonnier Nolan, Assistant Secretary
Office of Environmental Compliance

lql

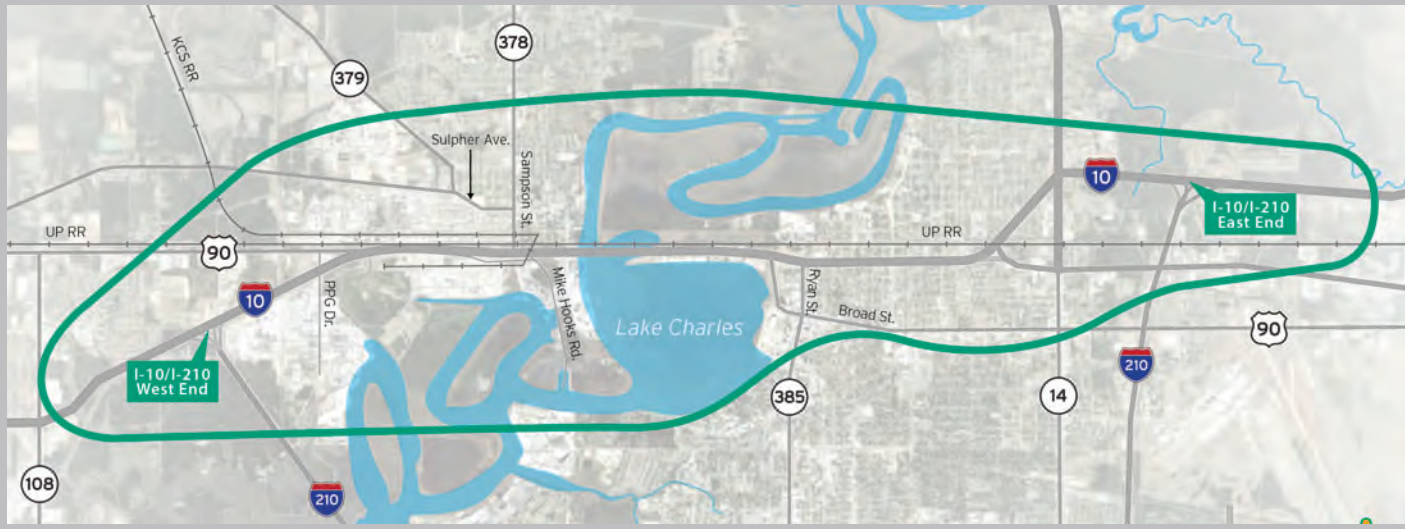
c: Imaging Operations – GW



**I-10 LAKE CHARLES
CALCASIEU RIVER BRIDGE**



State Project Number: H.003931



Agency Comments - Alternatives Screening Methodology

The Alternatives Screening Methodology (ASM) was sent to Cooperating, Participating and other Stakeholder Agencies for review prior to the second Agency and Public Meetings. The purpose of the ASM was to provide a decision-making framework to determine how well each Preliminary Alternative meets the Project's purpose and need and Project objectives. The commenters are identified in the table below, summarized below the table, and responses are provided accordingly.

Agency Comments on ASM			
ID# *	Name	Organization	Title
1	Balkum, Kyle	LDWF	Biologist, Manager
2	Blakemore, Doug	USCG	Branch Chief Bridge Administrator
3	Hardy, Linda	LDEQ	Environmental Manager
4	Howard, Brandon	NOAA	n/a
5	Marceaux, Joshua	USFWS	Fish and Wildlife Biologist
6	Marchuk, Charla	FEMA	Floodplain Management and Insurance Branch
7	Soileau, Cheri	IMCAL	Executive/MPO Director
8	Wright, Kevin	FRA	Environmental Protection Specialist
<p>Note: * Copies of the comments are found in Attachment D and are referenced by ID #.</p> <p>Acronyms: LDWF = Louisiana Department of Wildlife and Fisheries USCG = United States Coast Guard LDEQ = Louisiana Department of Environmental Quality NOAA = National Oceanic and Atmospheric Administration USFWS = United States Fish and Wildlife Service FEMA = Federal Emergency Management Agency IMCAL = Imperial Calcasieu Regional Planning and Development Commission FRA = Federal Railroad Administration MPO = Metropolitan Planning Organization</p>			

ID #1: Balkum, Kyle with LDWF

- **Comment 1:** At this time, LDWF has no objection to the Draft ASM provided for the project and looks forward to providing additional department comments once the Draft EIS is made available for review.
- **Response1:** *Comment noted.*

ID #2: Blakemore, Doug with USCG

- **Comment 1:** Each PBA will require coordination with the USCG.
- **Response 1:** *Comment noted. DOTD has and will continue to coordinate with USCG throughout the duration of the project.*
- **Comment 2:** Building a new bridge will require a new Coast Guard bridge permit and any major bridge rehabilitation could require modifying the existing bridge permit.
- **Response 2:** *Comment noted. DOTD will work with the USCG to obtain a new bridge permit should a PBA be identified as the Preferred Alternative.*
- **Comment 3:** As you move through the screening process, USCG suggests discussing

the four navigation and bridge height studies that were conducted to establish target vertical and horizontal bridge clearances.

- **Response 3:** *Comment noted. DOTD met with the Chief Bridge Administration Branch on Thursday, September 7, 2017 to discuss DOTD projects requiring a USCG permit, including the I-10 Calcasieu River Bridge, the PBAs and issues related to vertical and horizontal bridge clearances. Also see Response 1.*

ID #3: Hardy, Linda with LDEQ

- **Comment 1:** General comments relate to the obtainment of all necessary approvals and permits. This includes the following: submit a LPDES application if the project results in a discharge to waters of the state; the potential need for modification of the LPDES permit before accepting additional wastewater if the project results in a discharge to an existing wastewater treatment system; contacting the LDEQ Water Permits Division for storm water general permits if the construction area is equal to or greater than one acre; contacting the USACE regarding permitting issues if work will occur in areas subject to USACE jurisdiction, which may involve a water quality certification from LDEQ; observe precaution to protect groundwater and workers from hazardous constituents, if applicable; if project includes a sanitary wastewater treatment facility, a Sewage Sludge and biosolids Use or Disposal Permit is required; if water system improvements include water softeners, contact LDEQ Water Permits to determine if water quality based limitations are necessary; compliance with lead and asbestos regulations for renovation or remodeling; and if hazardous wastes, soils, or groundwater are encountered, notify the LDEQ single point of contact.
- **Response 1:** *Comment noted. The Project Team will work with the appropriate resource agencies to obtain the necessary approvals and permits, as applicable.*
- **Comment 2:** Specific comments include the following:
 - Without final piling locations and proposed depths, it is not possible to provide specificity in recommending depths which would be protective of the subsurface environment.
 - LDEQ has no objection to piling depths of 75 feet below current existing grade or less north of the current I-10 footprint – per the correspondence from LDEQ to DOTD on November 19, 2009.
 - No piling should exceed a depth of 40 feet below current existing grade south of the current I-10 footprint with the exception of the following: using a line drawn from CPT18, CPT7, and a point 50 feet due east of I8 as a reference, there would be no depth restrictions to the east of this line (see EDMS Document ID# 6754900 for reference points).
- **Response 2:** *Comment noted. It is DOTD's intention to minimize the risk to the Chicot Aquifer. If an alternative requiring driving piles in the EDC area is selected as the Preferred Alternative, DOTD would coordinate with LDEQ on appropriate depths. DOTD is committed to working with LDEQ on contamination issues as the project moves forward.*

From: Comrade Pickles
Sent: Monday, January 2, 2023 7:33 AM
To: CalcasieuBridge
Subject: NO TOLL

I seriously will put an additional 50 miles on my car to go around your bridge if you institute a toll. How stupid can you people be? Truly. I'm not trying to insult you, I'm genuinely astounded.

Appendix B
Letters from Agencies with Comments
on the DEIS



U.S. Department
of Transportation

**Federal Railroad
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

December 9, 2022

Noel Ardoin
Environmental Engineer Administrator
Louisiana Department of Transportation and Development
Environmental Section
P.O. Box 94245
Baton Rouge, LA 70804-9245

Re: Federal Railroad Administration comments on Draft Environmental Impact Statement
I-10 Calcasieu River Bridge Improvements

Dear Ms. Ardoin:

Thank you for providing the Federal Railroad Administration (FRA) the opportunity to review and comment on the I-10 Calcasieu River Bridge Improvements Draft Environmental Impact Statement in our capacity as a cooperating agency. FRA supports the preferred alternative 5G which would eliminate two at-grade crossings on Sampson Street. FRA encourages DOTD and FHWA to continue coordination with members of the public and railroad operators to ensure the selected alternative will provide optimal benefit to all impacted.

If you have any questions, you may contact Chris Hansen, Environmental Protection Specialist, at christopher.hansen@dot.gov or 571-564-1197.

Sincerely,

DEBORAH L Digitally signed by
SUCIU SMITH DEBORAH L SUCIU SMITH
Date: 2022.12.13 08:27:17
-05'00'

Deborah Suci Smith
Supervisory Environmental Protection Specialist
Environmental Program Management Office, Major Projects Team
Federal Railroad Administration

Cc: Daniel Suarez, FHWA
Lynn Heisler, FHWA
Chris Hansen, FRA
Marc Dixon, FRA



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Southeast Regional Office
263 13th Avenue South
St. Petersburg, Florida 33701-5505
<https://www.fisheries.noaa.gov/region/southeast>

September 21, 2021

F/SER46/BH:jm
225/380-0050

Ms. Noel Ardoin
Environmental Administrator
Louisiana Department of Transportation and Development
4101 Gourrier Avenue
Baton Rouge, Louisiana 70808

Dear Ms. Ardoin:

NOAA's National Marine Fisheries Service (NMFS) received your Essential Fish Habitat (EFH) Assessment on August 27, 2021, for the replacement of the Interstate 10 Bridge over the Calcasieu River in Lake Charles, Louisiana. The NMFS provided technical assistance by email on May 11, 2017, and again on June 8, 2021, in response to draft alternatives analyses. Three alternatives were presented. Alternatives 3A and 3E proposed new bridges north of the existing bridge while Alternative 5G would replace the bridge immediately adjacent. The following comments are provided in accordance with provisions of the Fish and Wildlife Coordination Act (16 U.S.C. 661 et seq.) and 600.920 of the Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act; P.L. 104-297).

The NMFS agrees with the federally managed fishery species and habitats identified in the EFH Assessment. The NMFS does not support Alternatives 3A and 3E. These alternatives would impact tidal marsh and further fragment EFH in the area. The NMFS recommended Alternative 5G, which was ultimately selected as the preferred alternative. Alternative 5G would impact 7.9 acres of wetlands by excavation and 11.9 acres of estuarine water bottoms and estuarine water column by shading. Of the 7.9 acres of wetland impacts, only the fringing marsh adjacent to the Calcasieu River is EFH and totals approximately 0.3-acre. The preferred alternative demonstrates substantial avoidance and minimization of impacts to EFH and wetlands. Wetland impacts will be mitigated at a federally approved mitigation bank.

The preferred alternative will not have substantial adverse impacts to EFH or federally managed fishery species. As such, we have no additional comments to provide. The NMFS appreciates your efforts to avoid and minimize wetland and EFH impacts. This concludes the EFH consultation requirements pursuant to the Magnuson-Stevens Act for this activity. If you wish to discuss this project further or have questions, please contact Brandon Howard at (225) 380-0050 or by email at Brandon.Howard@noaa.gov.

Sincerely,

Rusty Swafford
Acting Assistant Regional Administrator
Habitat Conservation Division

c:
F/SER46, Swafford
F/SER4, Dale
HNTB, Taylor
Files



Nathan Tipton

From: Brandon Howard - NOAA Federal <brandon.howard@noaa.gov>
Sent: Monday, November 28, 2022 8:33 AM
To: Lynn Maloney-Mujica
Cc: CalcasieuBridge; Nathan Tipton; Noel Ardoin; Meredith Taylor
Subject: Re: Federal Aid Project H.003931 I-10 Calcasieu River Bridge Improvements Project Draft Environmental Impact Statement
Attachments: NMFS_I-10 Calcasieu River Bridge_final.pdf

Hi Lynn.

Thank you for your email. NOAA's Habitat Conservation Division maintains its position that the project would not have a substantial adverse impact on essential fish habitat or federally managed fishery species given the chosen alternative. We appreciate all the upfront coordination on this project and the opportunity to review the EFH assessment prior to release of the DEIS. A copy of our Sept 2021 letter is attached for your reference.

Brandon

On Wed, Nov 9, 2022 at 11:35 AM Lynn Maloney-Mujica <lmaloneymujica@hntb.com> wrote:

The Louisiana Department of Transportation and the Federal Highway Administration, as co-sponsors and lead agencies for the above-captioned project, have made the October 2022 Draft EIS available for review and comment on the project website at www.i10lakecharles.com. A link on the front page will open the Draft EIS for you. The appendices and links to the EIS and other documents can be found in the Project Library at <https://www.i10lakecharles.com/documentlibrary>.

Comments on the project will be accepted in writing until January 3, 2023.

Please direct any comments you may have to CalcasieuBridge@hntb.com or by responding to this email. You may also send comments by mail to

I-10 Calcasieu Bridge EIS

c/o HNTB Corporation

10000 Perkins Rowe

Suite 604

Baton Rouge, LA 70810

If your questions or concerns are immediate, please call the Project Manager at 225-368-2826 and leave a message. We will return your call during regular business hours Monday-Friday.

I-10 CALCASIEU BRIDGE & IMPROVEMENTS

Email: CalcasieuBridge@hntb.com

Phone: 225-368-2826

This e-mail and any files transmitted with it are confidential and are intended solely for the use of the individual or entity to whom they are addressed. If you are NOT the intended recipient and receive this communication, please delete this message and any attachments. Thank you.

*Brandon Howard
Fishery Biologist
Habitat Conservation Division
NOAA Fisheries Service
5757 Corporate Blvd, Suite 375
Baton Rouge, LA 70808*

Office: 225-380-0056
Cell: 601-890-1088 Text Okay



NOAA FISHERIES

Web www.nmfs.noaa.gov
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Twitter www.twitter.com/noaafisheries
YouTube www.youtube.com/usnoaafisheriesgov



DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS, NEW ORLEANS DISTRICT
7400 LEAKE AVENUE
NEW ORLEANS LA 70118-3651

December 22, 2022

Regulatory Division
Special Projects and Policy

SUBJECT: MVN 2022-00588-MS

I-10 Calcasieu Bridge EIS
c/o HNTB Corporation
10000 Perkins Rowe, Suite 604
Baton Rouge, Louisiana 70810

To Whom it May Concern:

Please accept the following as the U.S. Army Corps of Engineers, New Orleans District Regulatory Division's (CEMVN) comments regarding the Draft Environmental Impact Statement (DEIS), dated October 27, 2022, for the I-10 Lake Charles Calcasieu River Bridge, State Project No. H.003931, located in Calcasieu Parish.

As practicable alternatives are determined, CEMVN recommends that the project proponents continue to take all necessary steps to avoid and minimize impacts to wetlands. 40 CFR Section 230.10(a)(3) sets forth rebuttable presumptions that 1) alternatives for non-water dependent activities that do not involve special aquatic sites are available unless clearly demonstrated otherwise and 2) where a discharge is proposed for a special aquatic site, all practicable alternatives for that proposed discharge that do not involve special aquatic sites are presumed to have less adverse impact on the aquatic environment, unless clearly demonstrated otherwise.

Additionally, federal projects (Calcasieu River) are known to exist in this area that may require further engineering review prior to the initiation of any activities on this portion of your project. For more information, please contact Ms. Tracy Falk of our Operations Division at (504) 862-2971.

CEMVN appreciates the opportunity to provide comments on the DEIS. Should you have any additional question regarding this matter please contact Mr. Stephen Pfeffer at (504) 862-2099 or at stephen.d.pfeffer@usace.army.mil with reference to Account# MVN-2022-00588-MS.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen Pfeffer", is positioned above the typed name.

Stephen Pfeffer
Environmental Resource Specialist

U.S. Department of
Homeland Security

United States
Coast Guard



Commander
Eighth Coast Guard District
Hale Boggs Federal Building

500 Poydras Street, Room 1313
New Orleans, LA 70130-3310
Staff Symbol: (dpb)
Phone: (504) 671-2128
Fax: (504) 671-2133
D8DPBALL@uscg.mil

16590

January 12, 2023

Louisiana Department of Transportation and Development
Attn: Robert Lott
P.O. Box 94245
Baton Rouge, LA 70804

Dear Mr. Lott,

We have reviewed the Draft Environmental Impact Statement (DEIS) to replace the I-10 fixed bridge across the Calcasieu River, Lake Charles, LA. Below are our comments relating to navigation.

- You have proposed to build a bridge with a 73' vertical clearance and you have identified two companies that could be impacted by reducing the bridges vertical clearance from 135' (current bridge) to 73' (proposed bridge): Friend Ships and Louisiana Scrap Metal. We cannot approve this clearance reduction because it will not allow these two companies with a reasonable ability to use the Calcasieu River.
- You have also proposed that if the bridge were built with a 73' vertical clearance, then you would compensate Friend Ships and Louisiana Scrap Metal for lost revenue and/or vessel berths. We could accept reducing the vertical clearance if both companies were to accept LADOTD compensation. We would not need to know the terms of the compensation but would require signed documents from LADOTD, Friend Ships and Louisiana Scrap Metal attesting to and agreeing to the terms of the compensation.

Our comments are not an approval or a preliminary navigation determination. Our comments are based on the information you provided in the DEIS, specifically Appendix P Navigation Data Reports. If activities, assumptions or conditions identified in Appendix P change, then our comments on navigation could also change.

Please contact me if you need further information or would like to discuss.

Sincerely,

A handwritten signature in blue ink that reads "Doug Blakemore".

Doug Blakemore
Chief, Bridge Administration Branch
U.S. Coast Guard
By direction of the District Commander

Copy: CG Marine Safety Unit Lake Charles

To Whom It May Concern:

LDWF supports the alternative that involves the least negative impact to existing wetlands. Regardless of the alternative considered, ensure that the applicant provides adequate and appropriate mitigation for impacts to wetland functions. In regards to fisheries concerns, alternative 5G 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.

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.

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





United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
1001 Indian School Road NW, Suite 348
Albuquerque, New Mexico 87104

Electronic Submittal Only
ER 22/0488

January 3, 2022

Mr. Charles W. Bolinger
Division Administrator
Federal Highway Administration
5304 Flanders Drive, Suite A
Baton Rouge, Louisiana 70808

Subject: Comments on the I-10 Lake Charles Calcasieu River Bridge Project Draft
Environmental Impact Statement (DEIS) and Section 4(f) Evaluation

Dear Mr. Bolinger:

The Department of the Interior (Department) has reviewed the I-10 Lake Charles Calcasieu River Bridge Project DEIS and Section 4(f) evaluation. We understand the purpose of the project is to address the lack of system continuity on I-10; 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. The project alternatives analyzed in the DEIS consist of the No Build Alternative and three build alternatives. Alternate 5G, which proposes an elevated interchange at Sampson Street in Westlake, is recommended as the Preferred Alternative.

The DEIS and Section 4(f) evaluation contains a great deal of valuable information concerning both human and natural resources as well as issues related to the proposed improvements to the I-10 Lake Charles Calcasieu River Bridge between the I-10/I-210 west and I-10/I-210 east interchanges in Calcasieu Parish, Louisiana.

We welcome this opportunity to cooperate with the Federal Highway Administration (FHWA) and the Louisiana Department of Transportation and Development (LADOTD) and offer the following comments for your consideration.

National Park Service (NPS) Section 4(f) comments

INTERIOR REGION 4 • MISSISSIPPI-BASIN*
INTERIOR REGION 6 • ARKANSAS-RIO GRANDE-TEXAS-GULF
INTERIOR REGION 7 • UPPER COLORADO-BASIN*

ARKANSAS, LOUISIANA, NEW MEXICO, OKLAHOMA, TEXAS

*Partial

The DEIS and the Section 4(f) evaluation describes a range of avoidance alternatives, the affected Section 4(f) resources, and discloses potential project impacts to those resources.

The Lake Charles National Register Historic District (NRHD) and ten individual properties listed on the National Register of Historic Places (NRHP) were identified as being in the area of potential effect (APE) during Section 106 consultation. The NRHP properties are the Sacred Heart Church and School complex, Washen House, Southern Pacific Railroad Bridge, I-10 Calcasieu Bridge, US 90 Bridge over I-10, Pioneer Building, Sacred Heart of Jesus/Saint Katharine Drexel School, Collette House, Sunset Hotel, and the Reeves Temple C.M.E. Church and Cemetery.

LADOTD has determined the proposed action results in a finding of adverse effect for the I-10 Calcasieu Bridge, US 90 Overpass over I-10, and the Norris Point Archaeological Site (16CU128).

The DEIS and Section 4(f) evaluation discusses an ongoing coordination effort with the Louisiana Office of Cultural Development, Division of Historic Preservation (SHPO) in compliance with Section 106 of the National Historic Preservation Act (54 U.S.C. § 306108), as amended, and codified in its implementing regulations, 36 CFR §800, as amended (August 5, 2004). The SHPO concurred with LADOTD's findings on October 5, 2021. A draft Memorandum of Agreement (MOA) has been prepared pending final approval by the SHPO and the Advisory Council on Historic Preservation.

A public boat launch was identified in the existing I-10 right-of-way. The DEIS states that no information was available about the party who built the launch. LADOTD is identified as the official(s) with jurisdiction who administer the property. LADOTD advises the boat ramp is used occasional and its condition limits its use and poses a hazard to unknowing users. As a result, LADOTD has decided to close the boat ramp. LADOTD provided a written determination regarding the boat launch to FHWA on September 13, 2022.

The Department has no objection to Section 4(f) approval of this project contingent on the subsequent consummation and full execution of the requirements identified in the finalized MOA.

The Department has a continuing interest in working with the FHWA and LADOTD to ensure that impacts to resources of concern to the Department are adequately addressed. For matters related to NPS comments, please contact Steven M. Wright at Steven_M_Wright@nps.gov.

U.S. Geological Survey (USGS) comments

The U.S. Geological Survey (USGS) has reviewed the DEIS for the proposed I-10 Calcasieu River Bridge Improvements in Louisiana. The USGS' comments are intended to inform readers of a potential disturbance to a USGS streamgauge at the bridge and a nearby USGS ground water well.

The USGS operates streamgages along streams throughout the U.S. to collect water quantity and quality data for a variety of purposes. Continuous operation of USGS streamgages is essential for our stakeholders. These streamgages have permanent infrastructure and are vulnerable to disruption when construction or dredging occurs in the vicinity of them. Similarly, USGS wells also can be impacted by construction activities or surface/subsurface contamination. The USGS maintains an active streamgage within the proposed project area and an active ground water well in close proximity to the project area.

USGS Site Number	USGS Site Name	USGS Site Type	USGS Site Status	Location
8017044	Calcasieu River at I-10 at Lake Charles, LA	Gage	Active	Calcasieu Parish, LA
301435093154601	Cu-1021	Well	Active	“ “

The DEIS should list this streamgage and well as sites to be safeguarded and describe a process for coordination with the USGS during bridge design and construction. The USGS Lower Mississippi-Gulf Water Science Center should be contacted and given sufficient advance notice before construction near these sites. Efforts should be made to both preserve streamgages minimize impacts to the data collected at these sites.

The USGS thanks you for the opportunity to review and comment on this study. For any questions about the USGS’ comments, please contact Jon Janowicz, USGS Manager for Environmental Document Reviews, at (609) 771-3941 or at jjanowicz@usgs.gov.

If you have any questions for the Department or need assistance, please contact me at 720-814-6167, or rebecca_hunt@ios.doi.gov.

Sincerely,

**REBECCA
HUNT**

Digitally signed by REBECCA HUNT
Date: 2023.01.03 06:09:24 -07'00'

Rebecca Hunt
Regional Environmental Officer
Office of Environmental Policy and Compliance

Cc: Jon Janowicz, United States Geological Survey, jjanowicz@usgs.gov
Steven M. Wright, National Park Service, Stephen_M_Wright@nps.gov

APPENDIX C
Final MOA and Section 4(f)
Programmatic Agreements

APPENDIX C.1
Final MOA

**MEMORANDUM OF AGREEMENT
AMONG THE
U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL HIGHWAY ADMINISTRATION,
THE LOUISIANA DEPARTMENT OF TRANSPORTATION AND DEVELOPMENT,
AND THE LOUISIANA STATE HISTORIC PRESERVATION OFFICER
REGARDING IMPACTS TO THE NORRIS POINT ARCHAEOLOGICAL SITE
(16CU128) DUE TO IMPROVEMENTS TO INTERSTATE 10 BETWEEN INTERSTATE
210 INTERCHANGES
(FEDERAL AID PROJECT NO. H003931, STATE PROJECT NO. H.003931)
LAKE CHARLES AND WESTLAKE, CALCASIEU PARISH, LOUISIANA**

WHEREAS, the United States Department of Transportation Federal Highway Administration (FHWA), under the authority of 23 U.S.C. §101 *et seq.*, implements the Federal-aid Highway Program (Program) in the state of Louisiana by funding and approving state and locally sponsored transportation projects that are administered by the Louisiana Department of Transportation and Development (LADOTD); and

WHEREAS, FHWA, in conjunction with the LADOTD plans to improve approximately nine miles of Interstate 10 (I-10) between its interchanges with Interstate 210 (I-210) in Lake Charles and Westlake, Calcasieu Parish, Louisiana under Federal Aid Project No. H003931 and State Project No. H.003931 (Appendix 1). The project includes replacement of the I-10 Calcasieu Bridge (Structure #07104509127691, Recall No. 032780), removal of the US 90 Overpass (Structure #07100030405781, Recall No. 031450) and would include reconstruction of Interstate roadway, ramps, bridge approaches, service roads, and interchanges to ensure vertical clearance and horizontal alignment, sight distances and other road and bridge elements meet current design criteria (Undertaking); and

WHEREAS, the Louisiana FHWA Division Administrator is the "Agency Official" (*i.e.* Lead Federal Agency) responsible for ensuring that the Program in the state of Louisiana complies with Section 106 of the National Historic Preservation Act (NHPA)(54 U.S.C. §306108), as amended, and codified in its implementing regulations, 36 CFR §800, as amended (August 5, 2004); and

WHEREAS, FHWA determined that the Undertaking will have an adverse effect on historic properties and consulted with the Louisiana State Historic Preservation Officer (LASHPO), pursuant to 36 CFR §800, regulations implementing Section 106 of the NHPA (54 U.S.C. §306108); and

WHEREAS, this Memorandum of Agreement (MOA) is prepared pursuant to 36 CFR §800.6; and

WHEREAS, FHWA has defined the undertaking's area of potential effect (APE) as shown in Attachment 1; and

WHEREAS, FHWA, has conducted a Phase I Cultural Resources Survey and a Phase II Testing for Eligibility of the Norris Point Archaeological Site (Archaeological Site No. 16CU128) and in consultation with the LASHPO, has determined it eligible for the National Register of Historic Places under Criterion D; and

WHEREAS, FHWA, in consultation with the LASHPO, previously determined that the I-10 Calcasieu Bridge is eligible for the NRHP under Criteria A and C. It is included in LADOTD's Historic Bridge Inventory and as a Non-priority for Preservation bridge in the Programmatic Agreement among the FHWA, the LADOTD, the Advisory Council for Historic Preservation (ACHP) and the LASHPO regarding management of Historic Bridges in Louisiana, which was executed 21 September 2015. The bridge will be subject to the stipulations regarding Non-Priority for Preservation bridges therein described and will not be subject to additional Section 106 Consultation or adverse effect mitigations herein and is mentioned herein only for its association with the project; and

WHEREAS, FHWA, in consultation with the LASHPO, previously determined that the U.S 90 Overpass is eligible for the NRHP under Criterion C. It is included in LADOTD's Historic Bridge Inventory and as a Preservation Candidate bridge in the Programmatic Agreement among the FHWA, the LADOTD, the ACHP and the LASHPO regarding management of Historic Bridges in Louisiana which was executed 21 September 2015. The bridge will be subject to the stipulations regarding Preservation Candidate bridges therein described and will not be subject to additional Section 106 Consultation or adverse effect mitigations herein and is mentioned herein only for its association with the project; and

WHEREAS, FHWA has invited LADOTD, as the recipient of federal funds, to be a signatory to this MOA pursuant to 36 CFR §800.6(c)(2) since LADOTD has responsibilities under this MOA, and LADOTD has accepted; and

WHEREAS, FHWA has consulted Native American Tribes and the Choctaw Nation of Oklahoma requested information regarding the Norris Point Archaeological site, which FHWA provided. Subsequently, no comments or requests for additional information have been received from Native American Tribes; and

WHEREAS, FHWA, in conjunction with LADOTD, notified the public, area neighborhood associations, and other public organizations of the Section 106 consultation, inviting interested parties to request participation in the consultation, including agencies, elected officials and nonprofit organizations, and individual property owners. As a result, the United State Coast Guard, the City of Lake Charles Planning and Development Department, Lake Charles Historic Preservation Commission, Friendships, and others with interest in the I-10 Calcasieu River Bridge project requested to participate in this Section 106 consultation and are referred to herein as the "Consulting Parties"; and

WHEREAS, in accordance with 36 C.F.R. § 800.6(a)(1), FHWA notified the Advisory Council on Historic Preservation (ACHP) of the adverse effect determination providing the specified documentation and the ACHP, via their October 6, 2021 letter notified FHWA that ACHP has chosen not to participate in the consultation pursuant to 36 C.F.R. § 800.6(a)(1)(iii); and

WHEREAS, FHWA has consulted with Consulting Parties in the development of this MOA; and

WHEREAS, avoidance of archaeological site 16CU128 is not considered feasible, consequently a Phase III Data Recovery plan has been developed in coordination with LASHPO and is attached as Appendix 2; and

NOW, THEREFORE, FHWA and the LASHPO agree that the undertaking shall be implemented in accordance with the following stipulations in order to take into account the effect of the undertaking on historic properties.

STIPULATIONS

FHWA, in conjunction with LADOTD, shall ensure that the following measures are carried out:

I. Measures to Mitigate Adverse Effects to Historic Properties

A. Norris Point Archaeological Site (16CU128) Phase III Data Recovery

1. FHWA, in coordination with LADOTD and LASHPO, will ensure that the Phase III Archaeological Data Recovery Plan for Norris Point Archaeological Site (16CU128), developed in coordination with LASHPO is carried out meeting the current Louisiana Division of Archaeology field standards by archaeologists meeting the U.S. Secretary of the Interior's (SOI) Professional Qualification Standards (44 FR 44716, Sept. 1983), also published at 36 CFR Part 61, for Archaeology or work directly under the supervision of an individual who meets the Standards for Archaeology. The Phase III Data Recovery Plan (attached hereto as Appendix 2) shall contain a provision for revision of the plan, with LASHPO consultation, should field conditions warrant it.
2. LADOTD shall coordinate a site visit during the Phase III Data Recovery fieldwork to allow FHWA and LASHPO representatives to view the excavations, provided LASHPO desires it and field conditions and boat travel to the site are considered safe.
3. LADOTD, in coordination with FHWA, shall provide an "End of Fieldwork" summary of the Phase III Data Recovery field investigation within 60 days of completing fieldwork to demonstrate satisfactory adherence to the Phase III Data Recovery Plan. The summary will provide a field map showing placement of excavation units along with brief descriptions of notable features and deposits.
4. LASHPO will provide comments on the "End of Fieldwork" summary within 15 days of receipt and upon acceptance of the summary shall notify LADOTD that its field investigation has satisfied the fieldwork requirement of the Phase III Data Recovery Plan allowing LADOTD to proceed with the construction phases of the bridge replacement project.
5. FHWA, in coordination with LADOTD shall provide the draft report for Phase III Data Recovery in accordance with the October 2021 Louisiana Division of Archaeology Reporting Standards.
6. LASHPO shall provide comments on the draft report for Phase III Data Recovery within 30 days of receipt.

7. FHWA, in coordination with LADOTD, shall provide a revised report for Phase III Data Recovery within 30 days of receipt of LASHPO comments addressing LASHPO comments.
8. FHWA, in coordination with LADOTD, shall ensure that within 60 days after the report has been accepted as final, all artifacts and associated records will be curated with the Louisiana Division of Archaeology, as per their current standards, unless the property owner at the time of artifact removal elects to have the artifacts returned to them.
9. Following LASHPO acceptance of the Phase III Data Recovery Plan End of Fieldwork Report, construction related activities may proceed at the Norris Point archaeological site without restriction or further consideration of impact to archaeological resources, except those related to human remains (See Section III.B).

B. Public Education Outreach

1. Within 6 months of submittal of the final Phase III Data Recovery report, LADOTD shall ensure that the archaeological consultant responsible for carrying out the data recovery plan will submit an article on the site findings to a professional archaeological journal.
2. Within 18 months of submittal of the final Phase III Data Recovery report, FHWA, shall ensure LADOTD creates an electronic public presentation (e.g. an approximately 10 minute video or slide presentation) regarding the Norris Point Archaeological Site Phase III Data Recovery to be made available at LADOTD's publically accessible project website for two years after completion and will provide the presentation to LASHPO, for public accessibility, at the LASHPO's discretion, on the appropriate Louisiana Department of Culture, Recreation and Tourism website.

II. DURATION

This MOA will be null and void if its stipulations are not carried out within ten (10) years from the date of its execution. At such time, and prior to work continuing on the undertaking, FHWA shall either (a) execute a MOA pursuant to 36 C.F.R. § 800.6, or (b) request, take into account, and respond to the comments of the ACHP under 36 C.F.R. § 800.7. Prior to such time, FHWA may consult with the other signatories to reconsider the terms of the MOA and amend it in accordance with Stipulation V below. FHWA shall notify the signatories as to the course of action it will pursue.

III. POST-REVIEW DISCOVERIES

- A. FHWA shall require its CONTRACTORS to notify the LADOTD within 48 hours if it appears that the undertaking may affect a previously unidentified archaeological resource that may be eligible for inclusion in the NRHP or affect a known historic property in an unanticipated manner, FHWA in coordination with LADOTD, shall address the discovery or unanticipated effect in accordance with 36 CFR 800.13. FHWA, at its discretion may

hereunder, and pursuant to 36 CFR § 800.13(c), assume any unanticipated discovered property to be eligible for inclusion in the NRHP.

- B. In the event human remains, suspected human remains, or indications of a burial are discovered during construction, the procedures established by the Louisiana Unmarked Human Burial Sites Preservation Act (R.S 8:671-681) will be applied. All construction activities shall cease within a 50-foot buffer of the find location. The Calcasieu Parish Sheriff's Department and coroner, FHWA, LADOTD, and the State Archaeologist shall be immediately notified. If the discovery is determined to be a crime scene, the Calcasieu Parish Sheriff's Department has jurisdiction. If the discovery is determined to be more than 50 years old and not a crime scene, the Louisiana Division of Archaeology (LADOA) has jurisdiction. No remains shall be removed from the scene until jurisdiction is established, and the necessary permits obtained from the LADOA, if appropriate. The LADOA shall consult with the Parish, FHWA, LADOTD, and the Tribes as appropriate to determine the appropriate course of action. Work at the discovery scene shall not resume until authorized by the FHWA.

IV. DISPUTE RESOLUTION

Should any signatory to this MOA object at any time to any actions proposed or the manner in which the terms of this MOA are implemented, FHWA shall consult with such party to resolve the objection. If FHWA determines that such objection cannot be resolved, FHWA will:

- A. Forward all documentation relevant to the dispute, including the FHWA's proposed resolution, to the ACHP. The ACHP shall provide FHWA with its advice on the resolution of the objection within thirty (30) days of receiving adequate documentation. Prior to reaching a final decision on the dispute, FHWA shall prepare a written response that takes into account any timely advice or comments regarding the dispute from the ACHP, signatories and concurring parties, and provide them with a copy of this written response. FHWA will then proceed according to its final decision.
- B. If the ACHP does not provide its advice regarding the dispute within the thirty (30) day time period, FHWA may make a final decision on the dispute and proceed accordingly. Prior to reaching such a final decision, FHWA shall prepare a written response that takes into account any timely comments regarding the dispute from the signatories and concurring parties to the MOA, and provide them and the ACHP with a copy of such written response.
- C. FHWA's responsibility to carry out all other actions subject to the terms of this MOA that are not the subject of the dispute remain unchanged.

V. AMENDMENTS

This MOA may be amended when such an amendment is agreed to in writing by all signatories. The amendment will be effective on the date a copy signed by all of the signatories is filed with the ACHP.

VI. TERMINATION

If any signatory to this MOA determines that its terms will not or cannot be carried out, that party shall immediately consult with the other parties to attempt to develop an amendment per Stipulation V, above. If within thirty (30) days (or another time period agreed to by all signatories) an amendment cannot be reached, any signatory may terminate the MOA upon written notification to the other signatories.

Once the MOA is terminated, and prior to work continuing on the undertaking, FHWA must either (a) execute an MOA pursuant to 36 CFR § 800.6, or (b) request, take into account, and respond to the comments of the ACHP under 36 CFR § 800.7. FHWA shall notify the signatories as to the course of action it will pursue.

EXECUTION of this MOA by the FHWA and LASHPO and implementation of its terms evidence that FHWA has taken into account the effects of this undertaking on historic properties and afforded the ACHP an opportunity to comment.

SIGNATORY:

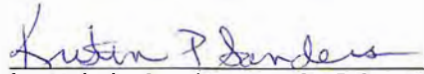
THE FEDERAL HIGHWAY ADMINISTRATION


by Charles W. Bolinger, Division Administrator

Date: 11-15-2022

SIGNATORY:

THE LOUISIANA STATE HISTORIC PRESERVATION OFFICER



by Kristin Sanders, LASHPO

Date: 11/9/2022

INVITED SIGNATORY:

THE LOUISIANA DEPARTMENT OF TRANSPORTATION AND DEVELOPMENT

A handwritten signature in blue ink, appearing to read "Shawn D. Wilson", written over a horizontal line.

by Shawn D. Wilson, Ph.D., Secretary

Date: 11/25/22

H.003931 I-10 Calcasieu River Bridge Section 106 Memorandum of Agreement 11-9-2022

CONCURRING PARTY:

CITY OF LAKE CHARLES DEPARTMENT OF PLANNING


by Lori Marinovich,, Assistant Director

Date: 11-30-2022

CONCURRING PARTY:


LAKE CHARLES HISTORIC PRESERVATION COMMISSION


by Joel Davidson, Commissioner

Date: 11/30/2022

CONCURRING PARTY:

ADLEY CORMIER


by Adley Cormier

Date: 11/29/2022

CONCURRING PARTY:

FRIENDSHIPS/PARK WEST CHILDREN'S FUND

by Sondra Tipton, Director

Date: _____

CONCURRING PARTY:

CHARLIE ATHERTON

by Charlie Atherton

Date: _____

CONCURRING PARTY:

UNITED STATES COAST GUARD

_____ Date: _____
by Doug Blakemore, Chief, Bridge Administration Branch, U.S. Coast Guard

APPENDIX 1: Project Location Map



APPENDIX 2
Phase III Data Recovery Research Design for the Norris Point Site (16CU128)
Lake Charles, Calcasieu Parish, Louisiana (LADOTD Project H.003931, Federal Aid
Project H003931)

Introduction

Phase II archaeological testing at the Norris Point site (16CU128) was conducted in March and April 2021 as part of the cultural resources investigations conducted for the proposed construction of the Calcasieu River Bridge Route I-10, Calcasieu Parish, Louisiana (State Project No. H.003931/Federal Aid Project No. H 003931; Legacy State Project Number 700-10-0115). Phase II testing at the site consisted of the mapping and recordation of four historic period features, the excavation of seven shovel tests, six auger cores and the hand excavation of two 1-by-1 meter test units in addition to limited surface collection. Test Unit N175E348 encountered an in situ, 30-cm thick, shell midden at approximately 35 cmbs. Test Unit N156E351 encountered an in situ, 20-cm thick, shell midden at approximately 120 cmbs. The two shell middens and the historic period features appear undisturbed. Based on this information, FHWA has determined the site to be eligible for listing on the National Register of Historic Places (NRHP) under Criterion D.

Site 16CU128 harbors buried, in situ, prehistoric deposits, consisting of a 30 cm-thick layer of shell midden (as exposed in TU N175E348) and an approximately 20 cm-thick layer of shell midden (as exposed in TU N156E351). Pottery recovered from the middens, as well as the reworked beach deposits at the surface of the site, suggest that the Norris Point site dates, at least in part, to the local equivalent of the latter half of the Coles Creek Period (~1000 to 1200 A.D.) and early Mississippi Period (1200 to 1400 A.D.), although analysis of the plainwares suggest that the local prehistory may be heavily influenced by the cultural history of the upper Texas coast. Given that these deposits have the potential to shed light on the prehistoric past of a region that is not well known archaeologically, these deposits are considered eligible for the NRHP under Criterion D. In addition, site 16CU128 contains intact archaeological foundations and features associated with the operation and various episodes of reconstruction of the ca. 1866–1903 Norris Sawmill. Although numerous sawmills operated in the Lake Charles area during the late

nineteenth century, few, if any, have been examined archaeologically, and very little is known about their physical layout and operation. Given the importance of timbering and the sawmill industry to the area and to the development of Lake Charles and Westlake, examination of the historic-period archaeological deposits at site 16CU128 could address important questions relative to the industry. Hence, the historic-period archaeological deposits at Norris Point site are also considered eligible for the NRHP under Criterion D.

The project plans for the proposed I-10 Calcasieu River Bridge have not yet been developed, and the exact placement of the bridge piers is not known. However, most of the site is located within the existing and proposed ROW for the new bridge and pier placement will likely occur within the site boundaries. Therefore, FHWA has determined that the proposed bridge construction will adversely affect site 16CU128.

As the site can only be accessed via water, presenting a challenge to bringing heavy equipment on site, excavations are anticipated to be by hand.

All tasks outlined in this document shall be directed by a Secretary of Interior (SOI) qualified archaeologist (SOI qualifications may be found at: <https://www.nps.gov/articles/sec-standards-prof-quals.htm>).

Archival Research

Additional archival research should be conducted that focuses on providing an historical context for the historic-period deposits encountered during the archaeological mitigation. This research should include, but is not limited to: chain of title records, historical map research and census records. Additional information and comparison to historic-period sites of similar age and function in the region should be discussed. In addition, comparable prehistoric sites in the region should be discussed. As only limited archaeological investigations of prehistoric sites of this period and those of historic-period sawmills have been conducted in the region, it may be necessary to compare the Norris Point site (16CU128) to sites outside of the region.

Field Methodology

Historic Component

- Targeted attempts will be made to locate historic-period structural feature locations through visual inspection and probing guided by overlays of available archival resources (e.g., Sanborn Map Company maps, aerial photography, etc.). If an historic-period structural feature is encountered, it will be exposed by hand excavation and/or clearing/cleaning, photographed and mapped. Details of each feature's construction (if any) will be recorded (e.g., brick and mortar typologies) and samples taken as necessary. The primary goal of this effort is to determine the locations of historic-period features in order to study their construction, alterations and spatial relationships.
- If artifact-bearing historic-period features are encountered, they will be examined through the hand-excavation of a maximum of two 1-by-1-meter units.
- A sample submerged surface collection will be conducted, if possible, where large amounts of wood and wood products were encountered during the 2022 vibracore survey.
- A selection of large metal and wood items that may be used in future exhibits will be conserved.

Prehistoric Component

- A series of 1-by-1-meter units will be hand excavated along the west side of the site at approximately 10-meter spacing, where possible. These units will be interspersed with the previously excavated test units to provide a more robust sampling of archaeological deposits. At least one 1-by-1-meter unit will be excavated at the south/east end of the site in the vicinity of several positive vibracore samples. The results of these excavations, coupled with that of the earlier test excavations, will be used to determine the placement of two block excavations. It is anticipated that six to eight 1-by-1-meter units, or their equivalent, will be excavated at the site as part of this work.
- Two block excavations—their placement to be determined by the results of the 1-by-1-meter unit excavations and the 2021 test unit locations—each consisting of the equivalent

of four 2-by-2-meter units each will be excavated. The block excavations should be as contiguous as possible, but may be dependent on the locations of large trees and other obstructions.

In total, six to eight 1-by-1-meter units and two block excavations, each consisting of four 2-by-2-meter units (or their equivalents), will be completed specifically in regard to the site's prehistoric deposits. All above-ground/water historic period features encountered will be exposed to the extent possible (i.e., clear of brush and/or debris) and recorded. In all, it is anticipated that a minimum of 38 1-by-1-meter units, or their equivalent, not to exceed a maximum of 42 1-by-1-meter units, will be excavated at the site.

Unit Excavation

The unit excavations should be designed to adequately sample features and/or archaeological deposits, either newly encountered or those that were recorded during the Phase II investigations. Excavation levels must follow natural stratigraphy, not to exceed 10-cm arbitrary levels with each stratum/deposit. All hand-excavated material should be minimally screened through ¼-in mesh and collected following standard archaeological practices. At the discretion of the Field Director, a finer mesh screen may be used for sampling of features or midden deposits. Representative soil flotations should be collected for macro botanical analysis from any deposits of interest. Within *in situ* prehistoric deposits, samples for dating the deposits will be taken as appropriate.

At least two (2) walls of each ~~sampled~~ unit must be profiled and photographed. If cultural features are identified, they should be profiled, photographed, and addressed in the technical report. The location of all units, features, and deposits encountered will be mapped on a site map.

Changes to the Data Recovery Plan

The archaeological site is situated in an environment that is subject to impact from weather events and other marine activity. Should field conditions warrant an alteration of this plan, FHWA and LADOTD will coordinate with LASHPO on the changes.

Standards and Reporting

LADOTD, SHPO and other consulting parties will be notified about the commencement of field work and invited for a site visit. Field work will be carried out following the Louisiana Division of Archaeology's Phase III Standards (<https://crt.state.la.us/Assets/OCD/archaeology/CRM-Resources/Section106/Field%20Standards%20final%2010-5-2021.pdf>) as well as the ACHP's "Recommended Approach for Consultation on Recovery of Significant Information for Archaeological Sites," (<https://www.achp.gov/digital-library-section-106-landing/recommended-approach-consultation-recovery-significant>). Following completion of the fieldwork, all results will be presented in a report format that meets the Division of Archaeology's Phase III Reporting Standards and the Secretary of Interior Standards for Archaeological Documentation (<https://www.nps.gov/articles/sec-stds-archo-doc-stds.htm>). This draft report will be produced within one year of the end of fieldwork. Four hard copies and one digital copy of the draft report will be submitted to LADOTD /FHWA for review. LADOTD will forward one hard copy and one digital copy to SHPO and a digital copy to all other consulting parties. Following a thirty-day review period, FHWA will ensure the SHPO and other consulting parties' comments are incorporated into the report. A final report incorporating the consulting parties' comments will be produced within three months following receipt of the comments. Three hard copies and two digital copies of the final report will be submitted to LADOTD. LADOTD will forward one hard copy and one digital copy of the final report to SHPO. A site update form that reports the results of the data recovery project will also be submitted to the Division of Archaeology.

Within two months following completion of all analyses and the acceptance of the final report, records, photographs, and field notes will be curated with:

State of Louisiana
Department of Culture, Recreation and Tourism – Division of Archaeology
P.O. Box 44247
Baton Rouge, LA 70804-4247
(225) 342-8170

Public Education Component

Information derived from the Data Recovery program will be used in the creation of public outreach products such as museum displays, informational kiosk and electronic presentations.

Potential Research Questions to be addressed by the Data Recovery of site 16CU128

The following themes have been identified from the Louisiana's Comprehensive Archaeological Plan (Girard et al. 2018) that can potentially be addressed by data recovery operations at the Norris Point site (16CU128). The research themes will continue to be developed during fieldwork in coordination with LADOTD, the SHPO, other consulting parties, and the archaeological contractor. LADOTD anticipates developing several of these themes into the Phase III archaeological investigation's research questions based on the historical and archaeological research and incorporating the answers to these questions in the archaeological report. Following the end of fieldwork, but prior to the submittal of a draft report, these research questions will be formalized in writing and provided to SHPO and other consulting parties for a 15-day review and comment period.

Potential Research Themes:

Paleoenvironments

- This theme examines how changing natural landscapes and climates over the last 15,000 years affected human settlement and adaptation. It also applies to documenting landscape changes over that time and how these changes have affected the visibility and distribution of sites in the modern landscape.

Subsistence Economy

- To understand past subsistence practices with regard to food acquisition, means of production, preparation, and consumption.

Material Technology

- To understand past manufacturing technologies including raw material procurement, manufacturing methods and strategies, and the organization of production. This theme could be applied to both the prehistoric and historic components at the site.

Architecture and Site Configuration

- To understand how communities organized themselves at the point or site scale across the landscape in relation to the physical landscape, social, religious, and political forces, and cultural beliefs and traditions. This goal also includes how people physically modified the landscape to accommodate these factors, including specific construction methods and techniques. This theme could also apply to both the prehistoric and historic components at the site.

Appendix C.2
Programmatic Section 4(F) Evaluation
for the I-10 Calcasieu River Bridge

**Programmatic Section 4(f) Evaluation and Approval for FHWA
Projects that Necessitate the Use of Historic Bridges**


**I-10 Calcasieu River Bridge and Improvements (I-10/I-210 West End to
I-10/I-210 East End) Calcasieu Parish, Louisiana**

State Project Number: H.003931

Statement

I-10 Calcasieu River Bridge

This statement sets forth the basis for a programmatic Section 4(f) approval that there are no feasible and prudent alternatives to the use of certain historic bridge structures to be replaced or rehabilitated with Federal funds and that the projects include all possible planning to minimize harm resulting from such use. This approval is made Pursuant to Section 4(f) of the Department of Transportation Act of 1966, 49 U.S.C. 303, and Section 18(a) of the Federal-Aid Highway Act of 1968 23 U.S.C. 138.

 Digitally signed by
CHARLES BOLINGER
Date: 2022.10.18 16:55:53
-05'00'

Approved _____

Date 10/18/2022

Why is This Report Being Prepared?

In accordance with Section 4(f) of the Transportation Act of 1966, as amended, the Federal Highway Administration (FHWA) cannot approve the use of land from publicly owned parks, recreational areas, wildlife and waterfowl refuges, or public and private historical sites unless there is no feasible and prudent avoidance alternative to the use of land and the action includes all possible planning to minimize harm resulting from such use, or the agency determines that the use of the property will have a de minimis impact.

“Use” is a term specific to Section 4(f) and is defined in 23 CFR 774.17. It falls into three general categories. The first type of use is when land is permanently incorporated into a transportation facility. The second type of use is temporary occupancy for construction-related activities. The third use is called constructive use, which occurs when proximity impacts of the proposed project adjacent to, or nearby, result in substantial impairment to the property’s activities, features, or attributes that qualify the property for protection under Section 4(f).

This report documents the determination that there are no feasible and prudent alternatives to the use of certain historic bridge structures to be replaced or rehabilitated with Federal funds and that the projects include all possible planning to minimize harm resulting from such use pursuant to Section 4(f) of the Department of Transportation Act of 1966, 49 U.S.C. 303, and Section 18(a) of the Federal-Aid Highway Act of 1968 23 U.S.C. 138.

What Would the Project Accomplish?

FHWA and the Louisiana Department of Transportation and Development (LADOTD) propose to improve the nine-mile extent of interstate (I-10) between interchanges at Interstate 210 East End and Interstate West End. The I-10 Calcasieu Bridge and Improvements project will replace the existing I-10 Calcasieu River Bridge.

The purpose of the I-10 Calcasieu Bridge Improvements project is to:

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

A photo of the bridge is provided on Figure 1. The project location is provided on Figure 2.

The I-10 Calcasieu Bridge (Figure 1) is a Steel High Truss bridge with the main span configured as a Warren through-truss, which is characterized by diagonal members to withstand both tensile and compressive forces. The overall length of the structure is 6,607 feet, consisting of seven (7) steel spans. The longest span is 420 feet. The use of a cantilever truss with a suspended through-truss span at the crest allowed the bridge to meet the challenges of crossing the Calcasieu River.



The I-10 Calcasieu River Bridge and the interstate within the project limits 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. The preferred replacement bridge crossing the Calcasieu River Bridge would be built with six 12-foot travel lanes, two 12-foot auxiliary lanes, and 12-foot shoulders.

What Section 4(f) Properties are Being Impacted?

On September 21, 2015, a ***Programmatic Agreement among FHWA, LADOTD, the Advisory Council on Historic Preservation, and the Louisiana State Historic Preservation Officer (SHPO) Regarding Management of Historic Bridges in Louisiana*** was executed. Because FHWA is responsible for assuring compliance with Section 106 of the National Historic Preservation Act and FHWA is also responsible for assuring compliance with Section 4(f) of the Department of Transportation Act and will fulfill those responsibilities through activities that are separate from the Section 106 Programmatic Agreement, FHWA formed a Historic Bridge Inventory committee. The committee identified pre-1971 bridges that are listed, or are eligible for listing, on the National Register of Historic Places. The agreement defined procedures for three different treatment categories: Preservation Priority, Preservation Candidate, and Non-Priority bridges.

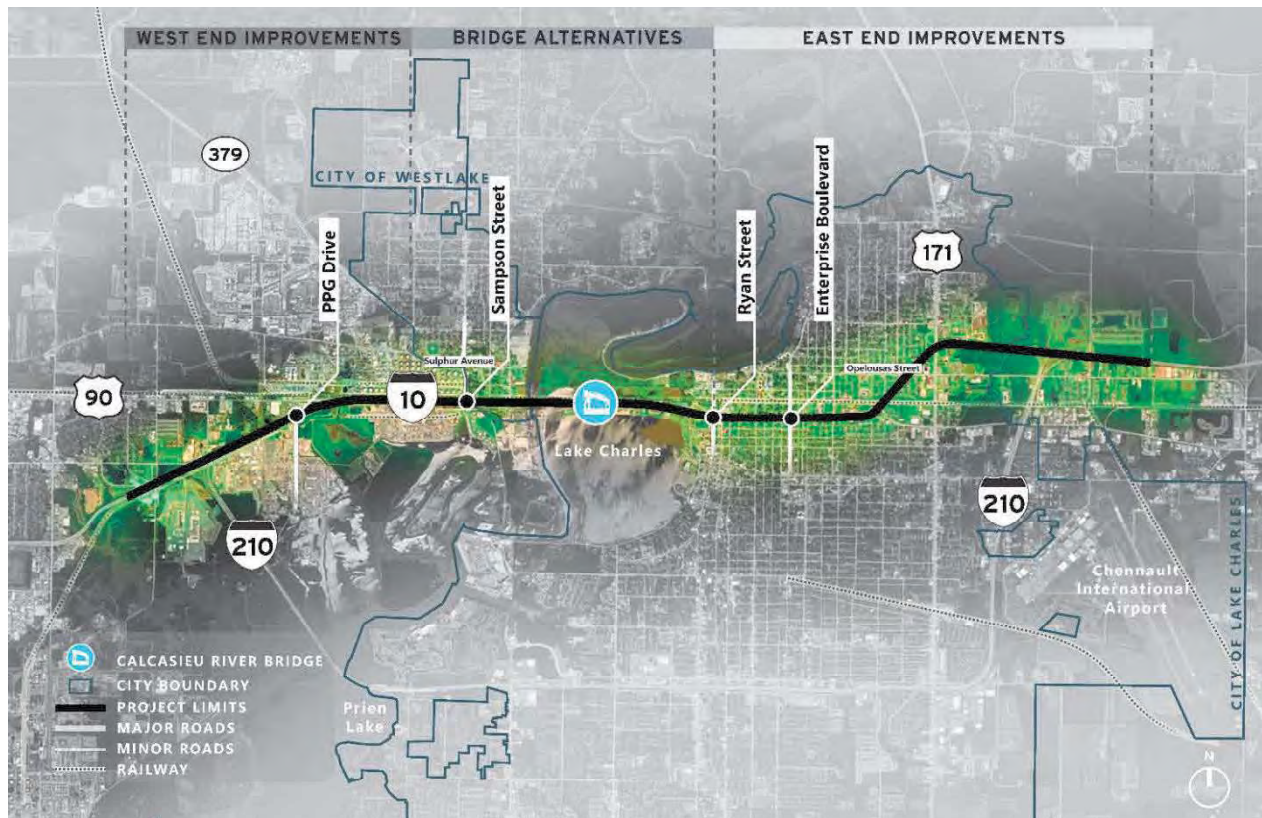


Figure 2 – Project Location and Extent

The I-10 Calcasieu River Bridge was determined to be eligible for the NRHP and, during the inventory process, was categorized as a non-priority historic bridge because it is not an ideal candidate for long-term preservation.

The Section 106 agreement allows replacement of non-priority bridges if the owner (LADOTD) follows the steps outlined. However, as stated under Stipulations, Paragraph II, 9: “[the Section 106 agreement] does not satisfy the requirements of Section 4(f) of the Transportation Act, as amended.” Therefore, a separate 4(f) evaluation is conducted to satisfy the requirements of the act. Under Section 4(f), bridge replacement is considered a permanent use.

Does the Project Qualify for Section 4(f) Programmatic Approval for Historic Bridges?

FHWA established a programmatic Section 4(f) approval in 1983 for situations where no feasible and prudent alternatives to use of historic bridges can be found (https://www.environment.fhwa.dot.gov/legislation/section4f/4f_bridges.aspx). The project record must clearly demonstrate that each of the alternatives was fully evaluated, and it must further demonstrate that all applicability criteria listed below were met before the FHWA

Division Administrator concludes that the programmatic Section 4(f) evaluation applies to the I-10 Calcasieu River Bridge Project.

1. The bridge is to be replaced or rehabilitated with Federal funds.
2. The project will require the use of a historic bridge structure which is on or is eligible for listing on the National Register of Historic Places (NRHP).
3. The bridge is not a National Historic Landmark.
4. The facts of the project match those set forth in the sections of the Programmatic 4(f) guidance labeled Alternatives, Findings, and Mitigation.
5. Agreement among the FHWA, SHPO, and the ACHP has been reached through procedures pursuant to Section 106 of the NHPA.

The I-10 Calcasieu River Bridge is proposed for replacement as part of Federal-Aid Project H.003931. The project will require use of the bridge, which is eligible for listing on the NRHP. The bridge is not a historic landmark. Agreement among the Section 106 parties listed in Item 5 above has been reached through the Section 106 Programmatic Agreement described above.

The facts of the project match those set forth in the sections of the Programmatic 4(f) guidance as described below.

Are There Any Alternatives that would Avoid Replacing the Bridge?

For a ***Programmatic Section 4(f) Evaluation and Approval for FHWA Projects That Necessitate the Use of Historic Bridges*** to be applied to a project, the project record must clearly demonstrate that each of the alternatives listed below was fully evaluated.

- Do nothing
- Build on new location without affecting the historic integrity of the bridge
- Rehabilitation without affecting the historic integrity of the bridge

Do Nothing. Alternatives that would avoid use of the bridge were studied. These include non-structural alternatives such as Travel Demand Management and the No-Build Alternative.

Non-structural alternatives and the No-Build alternative do not meet the purpose and need, and the No-Build is not feasible and prudent because the existing bridge is structurally deficient. Normal maintenance is not considered adequate to keep the existing bridge in service. The existing bridge is also functionally obsolete because it does not meet current design criteria. A safety analysis of I-10 estimated that the number of crashes expected in the period 2015-2017 for the section that includes the existing bridge exceeded the Louisiana statewide average by 131% for the same type of facility. To correct the geometric deficiencies of the bridge that would meet

design criteria would require major reconstruction of the existing bridge.

Build on New Location Without Using the Old Bridge. Two options for building a bridge on a new location without using the old bridge were studied.

Option 1, which proposed adding a second bridge on a new location parallel to the existing bridge and using the existing bridge as a one-way couplet, could address some of the horizontal geometric deficiencies. However, the steep vertical grade and bridge structure deficiencies could not be addressed. Adding a second bridge and still having to maintain a bridge which is past its service life and does not meet all design criteria does not meet the purpose and need for the project. Continuing to pay the costs of maintenance and operation (O&M) for the old bridge on top of the O&M costs for a new one would not be a prudent use of public funds.

Option 2, which proposed re-routing the entire project to the south and building the new bridge crossing Lake Charles and Contraband Bayou, was considered but dismissed by the agencies and public as too costly. It would also be more environmentally damaging because it would require a new alignment through wetlands and other waters of the US. In addition, the existing bridge would have to be retired from the interstate system, and neither the state nor local governments have an alternative use for it. The existing bridge is near the end of its life as a motorized vehicular bridge, and no responsible party has been identified with the resources to maintain and preserve its historic integrity.

Rehabilitation Without Affecting the Historic Integrity of the Bridge. Although the I-10 Calcasieu Bridge was rehabilitated in 2011- 2012, thus extended its life expectancy, it nevertheless does not meet current design criteria and has been determined inadequate for future projected traffic growth. Its structural deficiencies cannot be further addressed, and the inadequate geometry cannot be corrected without affecting the historic integrity of the bridge. Therefore, rehabilitation is not a feasible and prudent option.

What Measures to Minimize Harm will be Implemented?

The three build alternatives that would meet the purpose and need propose to demolish the existing bridge after construction of a replacement to the north. In accordance with the Programmatic Evaluation and Approval Guidance governing historic bridges, when the project proposes to replace the bridge, the existing bridge should be made available for an alternative use, provided a responsible party agrees to maintain and preserve the bridge and an agreement among the SHPO, ACHP, and FHWA is reached through the Section 106 process of the NHPA.

The Section 106 agreement executed in 2015 among LADOTD, FHWA, SHPO, and ACHP outlines the steps to be taken if a non-priority bridge like the I-10 Calcasieu Bridge is proposed for replacement. These steps have been undertaken. A Solicitation of Views (SOV) was sent to agencies and other authorities in 2013 along with a preliminary project description and study area map.

Coordination with these agencies and the public is ongoing as part of the National Environmental Policy Act (NEPA) process. LADOTD and FHWA are preparing an Environmental Impact Statement (EIS) for the project and, in the course of environmental review, have provided more than 45 days for responses. No objections have been received to date.

As stipulated in the Section 106 agreement, LADOTD has developed, maintained, and updated a Historic Bridge Inventory to provide mitigation for adverse effects to historic bridges, including replacement of non-priority bridges like the I-10 Calcasieu Bridge. LADOTD has fulfilled its Section 106 responsibilities related to the bridge and, in accordance with Attachment 6 of the Section 106 agreement, has offered the bridge for relocation through its dedicated Historic Bridge Marketing webpage.

Re-use of the bridge as a non-vehicular bridge is being encouraged. Parties interested in acquiring the bridge for adaptive, non-vehicular use may contact LADOTD via Katherine.Sinitiere@la.gov or 225-242-4509 to ask questions about submitting a proposal.

Funding that would be used for demolition of historic bridges can be used for its preservation at a new location. The estimated cost of demolition of the Calcasieu River Bridge is \$22,629,000. An amount not exceeding this estimated cost of demolition (\$22,629,000) would be made available to the new owner as a reimbursement for relocation and historic preservation of the bridge.

The entity receiving the bridge must agree to the following:

- The new owner would be charged the salvage value of the bridge which is estimated to be \$4,375,000. (According to Title 7 Section 14(A) of the Louisiana Constitution, property or things of value of the state shall not be donated to or for any person, association, or corporation, public or private).
- The entity must accept full ownership and all financial and legal responsibilities, including, but not limited to, maintenance, liability, and permitting.
- The entity shall ensure that the transferred bridge is closed to motorized vehicular traffic (e.g., cars and trucks).
- If the bridge is relocated, the relocation, reassembly and necessary permitting will be the responsibility of the entity taking ownership.
- The proposed use of the transferred bridge will be subject to the approval of FHWA Louisiana Division (lead federal agency), LADOTD (lead state agency), and Louisiana State Historic Preservation Office (LASHPO).
- The entity will be required to execute a preservation agreement that will include the above stipulations.

What are the Findings of the Alternatives Analysis and This Evaluation?

Table 1 contains a summary of the analysis and decision-making information included in this evaluation:

Table 1 – Alternatives Analysis Summary

Alternative	Feasible	Prudent	Uses Section 4(f) Property	Harm to Section 4(f) Property
Do Nothing	Yes	No	No	None
New Location Option 1	Yes	No	No	No
New Location Option 2	Yes	No	No	No
Rehabilitation	No	No	Yes	Adverse Effect

The bridge is owned by the LADOTD and currently carries I-10 vehicular traffic over the Calcasieu River. LADOTD, in conjunction with the FHWA, proposes replacement of the bridge under State Project No H.003931 and Federal Project Number H003931. As a mitigation stipulation for the Adverse Effect to this historic bridge, the bridge is being marketed to another entity for historic preservation. If ownership of the bridge is not transferred to another entity for moving to another location for an alternate use, the bridge will be demolished along with the other portions of the bridge.

The Calcasieu River Bridge was included in LADOTD’s Historic Bridge Inventory and was categorized as a Non-Priority for Historic Preservation due to its condition and the probability that it could not be modified to meet both the purpose and need of the project and the U.S. Secretary of the Interior’s standards for the treatment of historic bridges. Additionally, it was included in the Section 106 Programmatic Agreement among FHWA, LADOTD, ACHP and the SHPO regarding Management of Historic Bridges in Louisiana, executed August 25, 2015.

The above documentation illustrates that the proposed project complies with all requirements of the Programmatic Section 4(f) Evaluation for Federal-aid highway projects that require the use of a historic bridge.

Appendix C.3
Section 4(F) Evaluation
for the
Historic US 90 Bridge over I-10

US Department of Transportation Federal Highway Administration
Programmatic Section 4(f) Evaluation and Approval for FHWA Projects
that Necessitate the Use of Historic Bridges
I-10 Calcasieu River Bridge and Improvements
(I-10/I-210 West End to I-10/I-210 East End)
Calcasieu Parish, Louisiana
State Project Number: H.003931

Statement

US 90 Bridge Over I-10

This statement sets forth the basis for a programmatic Section 4(f) approval that there are no feasible and prudent alternatives to the use of certain historic bridge structures to be replaced or rehabilitated with Federal funds and that the projects include all possible planning to minimize harm resulting from such use. This approval is made Pursuant to Section 4(f) of the Department of Transportation Act of 1966, 49 U.S.C. 303, and Section 18(a) of the Federal-Aid Highway Act of 1968 23 U.S.C. 138.

Approved  Digitally signed by CHARLES
BOLINGER
Date: 2022.10.18 16:57:59 -05'00'

Date 10/18/2022



Why is This Report Being Prepared?

In accordance with Section 4(f) of the Transportation Act of 1966, as amended, the Federal Highway Administration (FHWA) cannot approve the use of land from publicly owned parks, recreational areas, wildlife and waterfowl refuges, or public and private historical sites unless there is no feasible and prudent avoidance alternative to the use of land and the action includes all possible planning to minimize harm resulting from such use, or the agency determines that the use of the property will have a de minimis impact.

“Use” is a term specific to Section 4(f) and is defined in 23 CFR 774.17. It falls into three general categories. The first type of use is when land is permanently incorporated into a transportation facility. The second type of use is temporary occupancy for construction-related activities. The third use is called constructive use, which occurs when proximity impacts of the proposed project adjacent to, or nearby, result in substantial impairment to the property’s activities, features, or attributes that qualify the property for protection under Section 4(f).

This report documents the determination that there are no feasible and prudent alternatives to the use of certain historic bridge structures to be replaced or rehabilitated with Federal funds and that the projects include all possible planning to minimize harm resulting from such use pursuant to Section 4(f) of the Department of Transportation Act of 1966, 49 U.S.C. 303, and Section 18(a) of the Federal-Aid Highway Act of 1968 23 U.S.C. 138.

What Would the Project Accomplish?

FHWA and the Louisiana Department of Transportation and Development (LADOTD) propose to improve the nine-mile extent of interstate (I-10) between interchanges at Interstate 210 East End and Interstate West End. The I-10 Calcasieu Bridge and Improvements project will replace the existing US 90 Bridge over I-10.

The purpose of the I-10 Calcasieu Bridge Improvements project is to:

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

A photo of the bridge is provided on Figure 1. The project location is provided on Figure 2.

The US 90 Bridge over I-10 (Figure 1) is a post-1945 common type with four main steel plate girder spans. Two spans are 150 feet and two are 175 feet, which are considered exceptional span lengths for this type of bridge, making it significant for its length.



Figure 1 – US 90 Bridge over I-10

The interstate within the project limits 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. The preferred treatment for the project would bring US 90 to grade and build a bridge for I-10 to overpass US 90.

What Section 4(f) Properties are Being Impacted?

On September 21, 2015, a ***Programmatic Agreement among FHWA, LADOTD, the Advisory Council on Historic Preservation, and the Louisiana State Historic Preservation Officer (SHPO) Regarding Management of Historic Bridges in Louisiana*** was executed. Because FHWA is responsible for assuring compliance with Section 106 of the National Historic Preservation Act and FHWA is also responsible for assuring compliance with Section 4(f) of the Department of Transportation Act and will fulfill those responsibilities through activities that are separate from the Section 106 Programmatic Agreement, FHWA formed a Historic Bridge Inventory committee. The committee identified pre-1971 bridges that are listed, or are eligible for listing, on the National Register of Historic Places (NRHP). The agreement defined procedures for three different treatment categories: Preservation Priority, Preservation Candidate, and Non-Priority bridges.



Figure 2 – Project Location and Extent

The US 90 bridge was determined eligible for the NRHP and, during the inventory process, was categorized as a Preservation Candidate for its good integrity.

The Section 106 agreement outlines procedures for projects affecting preservation candidate bridges. These prescribe an alternatives analysis with steps to be completed by the bridge owner, i.e., LADOTD. The analysis for the US 90 Bridge over I-10 is provided in the Alternatives Analysis Matrix (Attachment A). A letter was sent to the SHPO in June 2021 initiating the Section 106 process for this bridge.

However, as stated under Stipulations, Paragraph II, 9: “[the Section 106 agreement] does not satisfy the requirements of Section 4(f) of the Transportation Act, as amended.” Therefore, a separate 4(f) evaluation was conducted to satisfy the requirements of the act. Under Section 4(f), bridge replacement is considered a permanent use.

Does the Project Qualify for Section 4(f) Programmatic Approval for Historic Bridges?

FHWA established a programmatic Section 4(f) approval in 1983 for situations where no feasible and prudent alternatives to use of historic bridges can be found

(https://www.environment.fhwa.dot.gov/legislation/section4f/4f_bridges.aspx). The project record must clearly demonstrate that each alternative was fully evaluated, and it must further demonstrate that all applicability criteria listed below were met before the FHWA Division Administrator concludes that the programmatic Section 4(f) evaluation applies to the I-10 Calcasieu River Bridge Project.

1. The bridge is to be replaced or rehabilitated with Federal funds.
2. The project will require the use of a historic bridge structure which is on or is eligible for listing on the National Register of Historic Places (NRHP).
3. The bridge is not a National Historic Landmark.
4. The facts of the project match those set forth in the sections of the Programmatic 4(f) guidance labeled Alternatives, Findings, and Mitigation.
5. Agreement among the FHWA, SHPO, and the ACHP has been reached through procedures pursuant to Section 106 of the NHPA.

The US 90 Bridge over I-10 is proposed for replacement as part of Federal-Aid Project H.003931. The project will require use of the bridge, which is eligible for listing on the NRHP. The bridge is not a historic landmark. Agreement among the Section 106 parties listed in Item 5 above has been reached through the Section 106 Programmatic Agreement described above.

The facts of the project match those set forth in the sections of the Programmatic 4(f) guidance as described below.

Are There Any Alternatives that would Avoid Replacing the Bridge?

For a ***Programmatic Section 4(f) Evaluation and Approval for FHWA Projects That Necessitate the Use of Historic Bridges*** to be applied to a project, the project record must clearly demonstrate that each of the alternatives listed below was fully evaluated.

- Do nothing
- Build on new location without affecting the historic integrity of the bridge
- Rehabilitation without affecting the historic integrity of the bridge

Do Nothing. Alternatives that would avoid use of the bridge were studied. These include non-structural alternatives such as Travel Demand Management and the No-Build Alternative.

Non-structural alternatives and the No-Build alternative do not meet the purpose and need. Specifically, the need for system continuity and reducing congestion cannot be addressed because the two additional interstate lanes needed at this location cannot be accommodated inside the existing overpass piers. The existing bridge is also functionally obsolete because it does not meet current design criteria for adequate vertical clearance. To correct the geometric deficiencies of the

bridge to meet design criteria would require major reconstruction of the existing bridge.

Build on New Location Without Using the Old Bridge. Realigning I-10 to bypass the US 90 overpass bridge was considered. Due to the proximity of the railroad to the north, the only bypass option would be to align I-10 to the south.

The realignment of I-10 would require acquisition of approximately 30 acres of industrial properties and lands that contain wetlands and other waters of the US. A new overpass bridge connecting US 90 over I-10 would be required to keep US 90 connected, and a second overpass of the I-10 Service Road might also be required. The costs to rehabilitate and maintain the overpass bridge for adaptive reuse, acquire right of way, and the need to construct new overpass(es) and raise I-10 to pass over the section of US 90 left in place is estimated to exceed \$60 million.

Rehabilitation Without Affecting the Historic Integrity of the Bridge. Two rehabilitation options were considered.

Option 1. A rehabilitation alternative, coupled with the bypass of the existing US 90 overpass (described above) that would limit the bridge for non-vehicular use, was also considered. The location of the existing US 90 bridge is in an industrial area dominated by the interstate, railroads, and tank farms that does not attract pedestrian or bicycle uses. It would not provide any useful connections between residential areas and job centers, educational institutions, or shopping venues. Therefore, the demand for non-vehicular use would be low.

Option 2. A rehabilitation alternative would build a second bridge near the existing one as a couplet. A bridge inspection undertaken in 2012 found that, due to the conditions and low ratings of the existing deck sections, the most prominent repair need to keep the US 90 overpass in service was a full deck replacement. The strengthening and addition of piers along with widening of the roadway to accommodate two one-way lanes according to current design criteria would allow the bridge use to continue as is, but the preservation standards outlined in *The Secretary of the Interior's Standards for the Treatment of Historic Properties* cannot be met. The inspection report and subsequent inspections indicate that rehabilitation would extend the service life of the US 90 bridge for at least 25 years, but to meet the purpose and need for the project, I-10 would have to be elevated to cross over the rehabilitated bridge. The historical setting and use of the US 90 overpass would be lost.

As stipulated in the Section 106 agreement, LADOTD has followed Procedures for Projects Affecting Preservation Candidate Bridges as outlined in Attachment 4B. Because a treatment has been selected that does not follow the Secretary's standards, LADOTD has investigated alternatives including rehabilitation on-site, bypass and adaptive reuse, and rehabilitation as

one-way pair, which are preferred treatments for Preservation Candidate Bridges.

However, because the preferred treatments are not prudent and feasible, LADOTD has selected demolition and replacement as treatment for the US 90 bridge over I-10. LADOTD submitted the alternatives analysis to the SHPO for review. on July 21, 2021. The SHPO responded on August 20, 2021, with a letter of no objection to the decision to replace the overpass.

What Measures to Minimize Harm will be Implemented?

The three build alternatives that would meet the purpose and need propose to replace the existing overpass bridge with an at-grade roadway with I-10 overpassing it on the same alignments. In accordance with the Programmatic Evaluation and Approval Guidance governing historic bridges, when the project proposes to replace the bridge, the existing bridge should be made available for an alternative use, provided a responsible party agrees to maintain and preserve the bridge and an agreement among the SHPO, ACHP, and FHWA is reached through the Section 106 process of the NHPA.

The Section 106 agreement executed in 2015 among LADOTD, FHWA, SHPO, and ACHP outlines the steps to be taken if a preservation candidate bridge like the US 90 overpass of I-10 is proposed for replacement. These steps have been or will be undertaken. A Solicitation of Views (SOV) was sent to agencies and other authorities in 2013 along with a preliminary project description and study area map.

Coordination with these agencies and the public is ongoing as part of the National Environmental Policy Act (NEPA) process. LADOTD and FHWA are preparing an Environmental Impact Statement (EIS) for the project and, over the course of environmental review, have provided more than 45 days for responses. No objections have been received to date.

As stipulated in the Section 106 agreement, LADOTD has continued to conduct preventative maintenance and preservation of the bridge to the extent that it is prudent and feasible. As well, LADOTD has developed, maintained, and updated a Historic Bridge Inventory to provide mitigation for adverse effects to historic bridges, including replacement of preservation candidate bridges like the US 90 overpass of I-10. LADOTD has fulfilled its Section 106 responsibilities related to the bridge and, in accordance with Attachment 6 of the Section 106 agreement, has offered the bridge for relocation through its dedicated Historic Bridge Marketing webpage.

Re-use of the bridge as a non-vehicular bridge is being encouraged. Parties interested in acquiring the bridge for adaptive, non-vehicular use may contact LADOTD via Katherine.Sinitiere@la.gov or 225-242-4509 to ask questions about submitting a proposal.

Funding that would be used for demolition of historic bridges can be used for its preservation at a new location. The estimated cost of demolition of the US 90 over I-10 Bridge is \$1,969,000. An

amount not exceeding this estimated cost of demolition (\$1,969,000) would be made available to the new owner as a reimbursement for relocation and historic preservation of the bridge.

The entity receiving the bridge must agree to the following:

- The new owner would be charged the salvage value of the bridge which is estimated to be \$895,000. (According to Title 7 Section 14(A) of the Louisiana Constitution, property or things of value of the state shall not be donated to or for any person, association, or corporation, public or private).
- The entity must accept full ownership and all financial and legal responsibilities, including, but not limited to, maintenance, liability, and permitting.
- The entity shall ensure that the transferred bridge is closed to motorized vehicular traffic (e.g., cars and trucks).
- If the bridge is relocated, the relocation, reassembly and necessary permitting will be the responsibility of the entity taking ownership.
- The proposed use of the transferred bridge will be subject to the approval of FHWA Louisiana Division (lead federal agency), LADOTD (lead state agency), and Louisiana State Historic Preservation Office (LASHPO).
- The entity will be required to execute a preservation agreement that will include the above stipulations.

What are the Findings of the Alternatives Analysis and This Evaluation?

Table 1 contains a summary of the analysis and decision-making information included in this evaluation and approval:

Table 1 – Alternatives Analysis Summary

Alternative	Feasible	Prudent	Uses Section 4(f) Property	Harm to Section 4(f) Property
Do Nothing	Yes	No	No	None
Bypass and adaptive reuse	Yes	No	No	None
Rehabilitation On-Site	Yes	No	No	Adverse Effect
Rehabilitation as a One-Way Pair	No	No	Yes	Adverse Effect

The bridge is owned by the Louisiana Department of Transportation and currently carries I-10 vehicular traffic over the Calcasieu River. LADOTD in conjunction with the FHWA proposes replacement of the bridge under State Project No H.003931 and Federal Project Number H003931. As a mitigation stipulation for the Adverse Effect to this historic bridge, the bridge is being marketed to another entity for historic preservation. If ownership of the bridge is not transferred to another entity for moving to another location for an alternate use, the bridge will be demolished along with the other portions of the bridge.

The US 90 Bridge over I-10 was included in LADOTD’s Historic Bridge Inventory and was categorized as a Preservation Candidate because of its good integrity. However, the evaluation concluded that the bridge could not be modified to meet the purpose and need of the project and meet the U.S. Secretary of the Interior’s standards for the treatment of historic bridges.

The above documentation illustrates that the proposed project complies with all requirements of the Programmatic Section 4(f) Evaluation for Federal-aid highway projects that require the use of a historic bridge.

Section C.4
Boat Launch Documentation



U.S. Department
of Transportation
**Federal Highway
Administration**

Louisiana Division Office

October 17, 2022

5304 Flanders Drive, Suite A
Baton Rouge, LA 70808
225.757.7600
225.757.7601 (fax)

In Reply Refer To:
HDA-LA

Noel Ardoin
Environmental Engineer Administrator
Louisiana Department of Transportation
and Development
Baton Rouge, LA

Subject: SP: H.003931, FP: 0101212
I-10 Calcasieu River Bridge Boat Launch Significance Determination
Calcasieu, Parish

Attention: Mr. Robert Lott
DOTD Environment Section

Dear Dr. Wilson:

We have determined under provisions of Section 11(c) of Title 23 Code of Federal Regulations Part 774 - Parks, Recreation Areas, Wildlife and Waterfowl Refuges, and Historic Sites (Section 4(f)) – that the I-10 Calcasieu River Bridge Boat Launch, considered in its entirety, is **not** significant and further consideration of the I-10 Calcasieu River Bridge Boat Launch under Section 4(f) is not required for the subject project.

Please find enclosed sufficient documentation from the officials with jurisdiction to support our determination. By copy of this letter we are requesting that the project file document our determination of non-applicability.

Should you have any questions, please contact me at (225) 757-7615 or at daniel.suarez@dot.gov.

Sincerely yours,

Daniel Suarez
Project Delivery Team Leader

Enclosure: (1)

cc: Paul Vaught III, DOTD
Peggy Paine, DOTD



Environmental Section
PO Box 94245 | Baton Rouge, LA 70804-9245
ph: 225-242-4502 | fx: 225-242-4500

John Bel Edwards, Governor
Shawn D. Wilson, Ph.D., Secretary

September 13, 2022

State Project No. H.003931
Federal Aid Project No. H003931
I-10 Calcasieu River Bridge
I-10 from I-10/I-210 West End to I-10/I-210 East End
Calcasieu Parish, Louisiana

Mr. Charles W. Bolinger
Division Administrator
Federal Highway Administration
5304 Flanders Drive, Suite A
Baton Rouge, Louisiana 70808

ATTN: Ms. Lynn Heisler

SUBJECT: Significance of Boat Launch

Dear Mr. Bolinger:

This letter is the response of the Louisiana Department of Transportation and Development (DOTD) to the request for information relative to the significance of the boat launch located within DOTD right-of-way on the east shore and north side of the I-10 bridge over Lake Charles. Reference is made to FHWA's Section 4(f) Policy Paper and 23 CFR 774.11(c).

Consideration under Section 4(f) is not required when the official(s) with jurisdiction over a park, recreation area, or wildlife and waterfowl refuge determine that the property, considered in its entirety, is not significant. In the absence of such a determination, the Section 4(f) property will be presumed to be significant. The Administration will review a determination that a park, recreation area, or wildlife and waterfowl refuge is not significant to assure its reasonableness. (23 CFR 774.11(c))

The official with jurisdiction is defined in 23 CFR 774.17.

In the case of public parks, recreation areas, and wildlife and waterfowl refuges, the official(s) with jurisdiction are the official(s) of the agency or agencies that own or administer the property in question and who are empowered to represent the agency on matters related to the property. (23 CFR 774.17)

The boat launch in question is within DOTD right of way and is maintained and administered by DOTD. In accordance with 23 CFR 774.17, DOTD is the official with jurisdiction. DOTD has

determined that the boat launch is not significant. (See attached memo from the Chief.) The current usage, funding, future plans, agreements, and other facilities in the area form the basis of the determination and are discussed below.

1. **Current Usage:** The current use of the boat launch is minimal. The boats using this launch are small draft vessels since the launch is not dredged. DOTD does not have the equipment to dredge the launch area which has silted in over the years, naturally and as a result of recent storms and hurricanes. The bulkheads are in disrepair and not visible in high water which makes launching hazardous during high water events and high tide. The parking area is dirt and aggregate and currently being used as a staging area by the adjacent railroad making repairs to their rail line. See Exhibit 1.

The boat ramp is generally used on the weekends, by three or four boaters. Large boats cannot use it because it has silted in. This condition also prohibits its use by small boats at low tide. During high tide, the bulkheads are under water and pose a hazard to unknowing users. (personal communication, between HNTB's Lynn Maloney and Lt. Ron Johnson 2021).

2. **Funding:** There has been no expenditure for the boat launch since 2017. The last DOTD maintenance activity at this boat launch was the removal of a derelict boat in March 2017 at a cost of \$3,815.71.
3. **Future Plans:** DOTD intends to permanently close the boat launch. (See attached memo from the Chief Engineer.) According to the DOTD District office responsible for the launch, the launch will be removed when construction of a new bridge begins in that area. Although DOTD does not intend to replace the launch, an entity can always request a joint use of the right of way for a new boat launch. In such a case, the entity would be required to maintain the launch and remove the launch if requested to do so by DOTD. To date, no entity has made such a request.

DOTD's mission is to plan, design, build and sustain a safe and reliable multimodal transportation and infrastructure system that enhances mobility and economic opportunity. DOTD's focus is on providing transportation facilities and not recreational facilities. The launch does not play a major role in fulfilling DOTD's mission of providing transportation systems, and the launch does not offer a significant recreational service.

4. **Agreement:** DOTD is responsible for the boat launch. There are no joint use agreements in place for the existing facility.
5. **Other Facilities:** The local Parish government operates and maintains a number of boat launches that provide access to the Calcasieu River and its lakes, Lake Charles and Prien Lake. (See Exhibit 2.) The closest to I-10 is the newly improved launch in Riverside Park in Westlake. This is an asphalt/concrete launch with asphalt parking upstream of the I-10 launch. There is a launch at the Riverside Park Complex on the City of Lake Charles' side of the River north of the Corps' salt water barrier which allows passage of shallow draft

vessels. This launch is a concrete launch with asphalt parking. Further south near I-210, there are two additional parks with launches, the Israel Lafleur Park and Prien Lake Park. The most notable is Prien Lake Park. This launch has two large concrete slips for launching multiple boats at the same time with two large concrete parking areas, one on each side of the launch. The Prien Lake Park launch is heavily used by boaters. Israel Lafleur Park is partially closed due to erosion and damage to some of the facilities. Repairs are planned. The launch is still available for use, but its bulkheads are damaged. A map showing the locations of the boat launches is attached as Exhibit 3.

In summary, providing and maintaining recreational facilities is not DOTD's mission. The boat launch in DOTD's right of way at Lake Charles is minimally used, in disrepair, and being closed. There are other well maintained public boat launches in the area that provide access to the river and lake. Therefore, it is DOTD's determination that the I-10 boat launch is not a significant recreational resource when viewed in its entirety. If you have any questions or need additional information, please advise. You may contact me at noel.ardoyn@la.gov or the Project Manager, Mr. Paul Vaught, at paul.vaught@la.gov.

Sincerely,



Noel Ardoyn
Environmental Engineer Administrator

Attachments

Memo from Chief Engineer
Exhibits 1 - 3

pc: Mr. Paul Vaught, Project Manager

Exhibit 1: I-10 boat launch located in I-10 ROW as seen from I-10 service road.



Exhibit 2: 2022 Google Images of Nearby Public Boat Launches

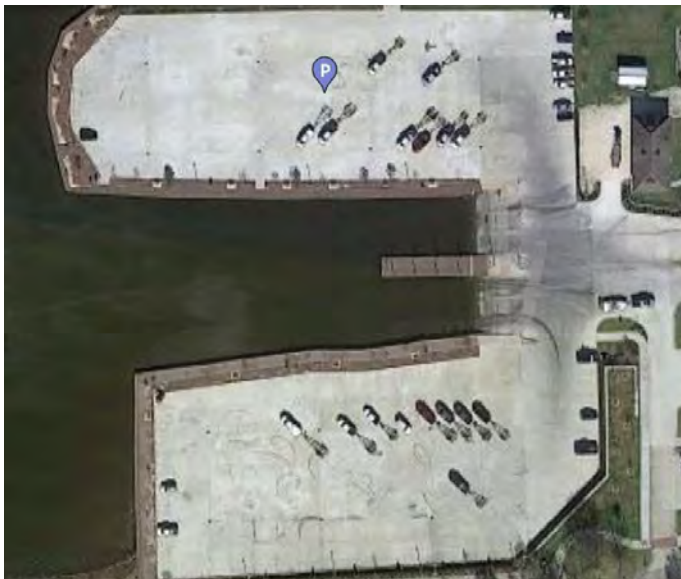
Riverside Park boat launch (Westlake side)



Riverside Park Complex (Lake Charles side)



Prien Lake Park boat launch

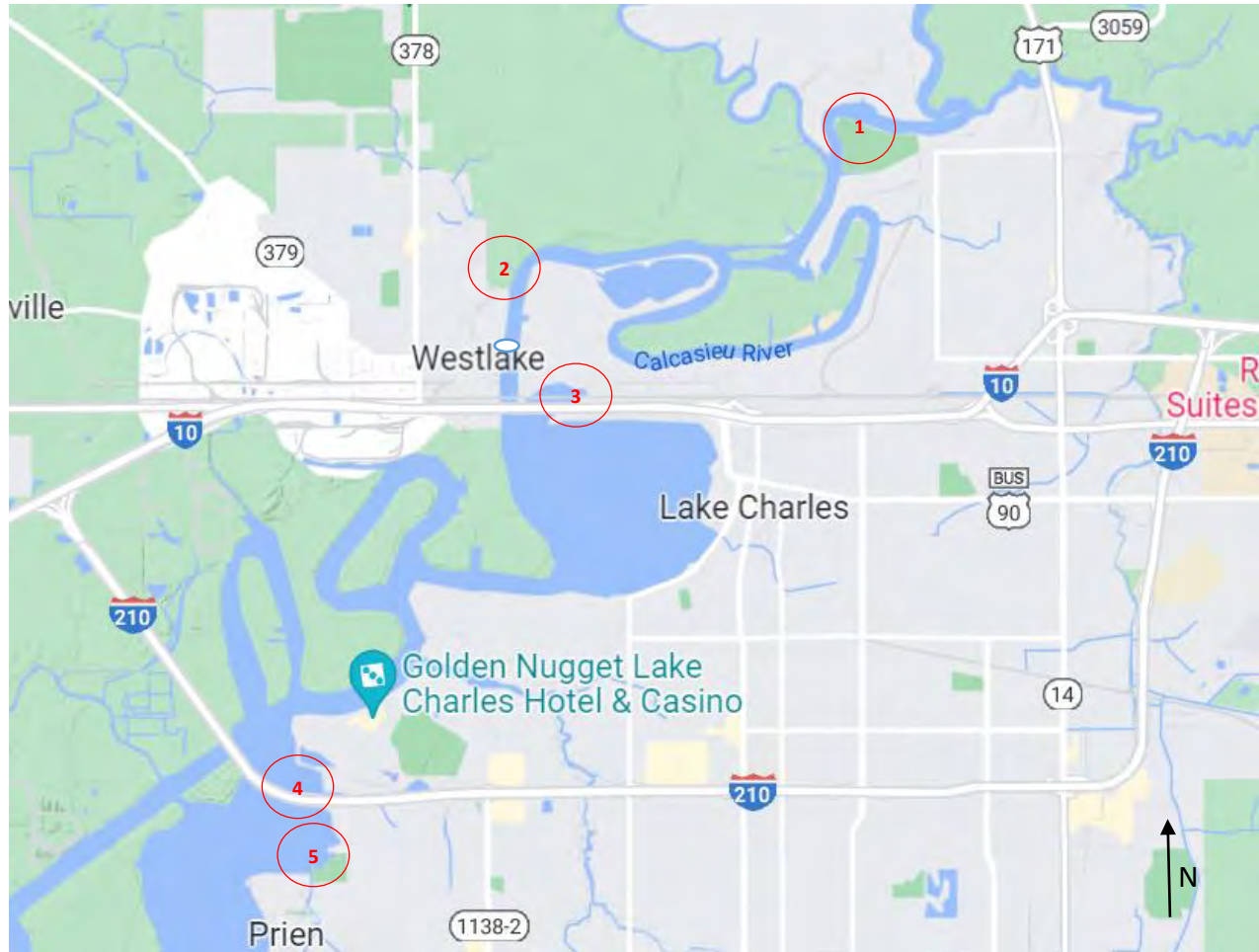


Isreal Lafleur Park boat launch (I-210)



Exhibit 3: Location of Boat Launches

1. Riverside Park Complex
2. Riverside Park
3. I-10 ROW
4. Israel Lafleur Park
5. Prien Lake Park





IN REPLY REFER TO
FILE NO.

INTRADEPARTMENTAL CORRESPONDENCE

REFERRED TO

- _____ REFERRED FOR ACTION
- _____ ANSWER FOR MY SIGNATURE
- _____ FOR FILE
- _____ FOR YOUR INFORMATION
- _____ FOR SIGNATURE
- _____ RETURN TO ME
- _____ PLEASE SEE ME
- _____ PLEASE TELEPHONE ME
- _____ FOR APPROVAL
- _____ PLEASE ADVISE ME

State Project No. H.003931
 Federal Aid No. H003931
 (I-10/I-210 West End to I-10/I-210 East End)
 I-10
 Calcasieu Parish

BY _____ DATE _____
 BY _____ DATE _____
 BY _____ DATE _____

MEMORANDUM:

TO: The Project Team

FROM: Christopher P. Knotts, P.E. *CPK*
 DOTD Chief Engineer

DATE: September 7, 2022

SUBJECT: Boat Launch in District 07, I-10 ROW

The Louisiana Department of Transportation and Development (LADOTD), the Official with Jurisdiction over the boat launch located within LADOTD right-of-way adjacent to the I-10 Lake Charles bridge, supports alternative 5G of the captioned project. This alternative proposes a new bridge located north of the existing bridge which will require the removal of the boat launch. This boat launch is not maintained and is in disrepair. The LADOTD District is not able to maintain the launch and LADOTD intends to close the launch.

The launch is rarely used because of its condition. Many boats cannot launch at this location because the launch area is not dredged. Its condition was made worse after the hurricanes of 2020 and 2021. Only shallow draft boats may use the launch. Attached are images showing the current condition of the launch and other public boat launches in the area.

The boat launch is not a significant property. There are a number of other well maintained public boat launches in the Lake Charles and Westlake area. There are two launches just north of the bridge on the Calcasieu River and one large launch south on Prien Lake which has access to Lake Charles via the Calcasieu River. There is also a smaller launch in Israel Lafleur Park. These launches are used by the community and maintained by the local governments. LADOTD determined that the boat launch is not a significant property and agrees that it is not a Section 4(f) resource.

CPK:NA:cwd

Attachments

RECOMMENDED FOR APPROVAL DATE

RECOMMENDED FOR APPROVAL DATE

RECOMMENDED FOR APPROVAL DATE

APPROVED DATE

Attachment 1

April 2022 View of boat launch in LADOTD ROW from service road. To be closed.



Some of the other boat launches in the area north and south of bridge:

Public Boat Launch North of Bridge at Riverside Park in Westlake:



Attachment 2

Public Boat Launch North of Bridge at Riverside Park Complex, Lake Charles



Public Boat Launch South of Bridge at Prien Lake Park, Lake Charles.



Appendix D
DEIS Distribution List

Agencies and Public Officials	
Director	Calcasieu Parish Engineering/Public Works
Director	Calcasieu Parish Planning & Development
Parish Administrator	Calcasieu Parish Police Jury
City Administrator	City of Lake Charles
Director	City of Lake Charles Planning & Development Department
Director	City of Sulphur Public Works
City Clerk	City of Westlake
Chief	Eighth Coast Guard District, Bridge Operations
District Commander	Eighth Coast Guard District, U.S. Coast Guard
Southwest Regional Administrator	Federal Aviation Administration
Deputy Administrator	Federal Emergency Management Agency Region VI
Administrator	Federal Railroad Administration
Administrator	Federal Transit Administration, Region 6
Chairman	Gulf Coast Soil and Water Conservation District of Louisiana
Executive Director	IMCAL/MPO
Executive Director	Lake Charles/Southwest Convention and Visitors Bureau
CFM, Manager	LADOTD Public Works and Water Resources Division
Commissioner	Louisiana Department of Agriculture and Forestry, Office of Forestry
Assistant Commissioner	Louisiana Department of Agriculture and Forestry, Office of Soil / Water Conservation
Secretary	Louisiana Department of Environmental Quality
Regional Manager	Louisiana Department of Environmental Quality
Environmental Manager	Louisiana Department of Environmental Quality
Administrator	Louisiana Department of Natural Resources Interagency Affairs & Field Services Division
Commissioner of Conservation, Assistant Secretary	Louisiana Department of Natural Resources Office of Conservation
Executive Director & Governor's Representative	Louisiana Department of Public Safety Highway Safety Commission
Administrator	Louisiana Division of Administration Office of State Lands
State Archaeologist and Director	Louisiana Division of Archaeology
Executive Director	Louisiana Division of Historic Preservation
Secretary of Economic Development	Louisiana Economic Development
Assistant Deputy Director of Emergency Management	Louisiana Governor's Office of Homeland Security and Emergency Preparedness
Director	Louisiana Governor's Office of Homeland Security and Emergency Preparedness
Regional Coordinator	Louisiana Governor's Office of Homeland Security and Emergency Preparedness Region 5
Assistant Secretary/SHPO	Louisiana Office of Cultural Development
Assistant Secretary	Louisiana Office of State Parks
Assistant Regional Coordinator	Louisiana Office of Tourism
Chairman	Louisiana State Mineral Board
Commander	Louisiana State Police Troop D
Biologist Program Manager	Louisiana Department of Wildlife and Fisheries
Program Manager	Louisiana Department of Wildlife and Fisheries Natural Heritage Program
State Conservationist	Natural Resources Conservation Service
Fishery Biologist	NOAA Fisheries Habitat Conservation Division
Assistant Regional Administrator	NOAA Fisheries Southeast Regional Office of Protected Resources
Executive Director	Port of Lake Charles Harbor & Terminal District
Executive Director	Preserve Louisiana
Chancellor	SOWELA Technical Community College
President & CEO	SWL Economic Development Alliance
LADOTD Liaison, Operations Division, Regulatory Branch	US Army Corps of Engineers New Orleans District
District Conservationist	US Department of Agriculture, Natural Resources Conservation Service, Lake Charles Service Center
Regional Director	US Department of Commerce Economic Development Administration
Regional Administrator	US Department of Housing and Urban Development
Office of Environmental Policy and Compliance	US Department of the Interior
Central Data Exchange (for e-NEPA filing)	US EPA
Office of Communities, Tribes and Environmental Assessment	US EPA Region 6
Deputy Field Supervisor	US Fish & Wildlife Service, Louisiana Ecological Services Field Office
Elected Officials	
President, Vice-President and Police Jury	Calcasieu Parish Police Jury
President, Vice-President and Members	City Council of Lake Charles
Members	City Council of Sulphur
Members	City Council of Westlake
Mayor	City of Lake Charles
Mayor	City of Sulphur
Mayor	City of Westlake
District 33 Representative	Louisiana House of Representatives
District 34 Representative	Louisiana House of Representatives
District 35 Representative	Louisiana House of Representatives
District 25 Senator Louisiana State Senate	Louisiana State Senate
Louisiana Third Congressional District Representative	US House of Representatives
US Senator for Louisiana	US Senate
US Senator for Louisiana	US Senate

Appendix E
Environmental Justice
Technical Analysis
September 2023



I-10 LAKE CHARLES CALCASIEU RIVER BRIDGE

ENVIRONMENTAL JUSTICE TECHNICAL MEMORANDUM

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

September 7, 2023



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1. Introduction

The Louisiana Department of Transportation and Development (LADOTD) developed and formalized the I-10 Calcasieu River Bridge Improvements Project in 2017. Preliminary studies and concepts developed previously were used as a foundation for this project. The I-10 Calcasieu River Bridge Improvements Project is proposed to improve Interstate 10 (I-10) between the I-10/I-210 West and I-10/I-210 East interchanges in Calcasieu Parish, LA (**Figure 1**). The project corridor includes the I-10 Calcasieu River Bridge that connects the cities of Lake Charles and Westlake. Chapter 1 of the I-10 Calcasieu River Bridge and Improvements Draft Environmental Impact Statement (DEIS) provides detailed information about the proposed project, the purpose of and need for the project, and how it will be funded. Chapter 2 of the DEIS provides detailed information about how the alternatives were screened and developed. Chapter 3 of the DEIS describes the affected environment and details how impacts were determined, minimized, and avoided. Mitigation for unavoidable impacts is described in Chapter 4 of the DEIS.

The analysis of effects is analyzed in three distinct areas of improvements. As shown on **Figure 1**, these are the West End Improvements, Bridge Alternatives, and East End Improvements sections.

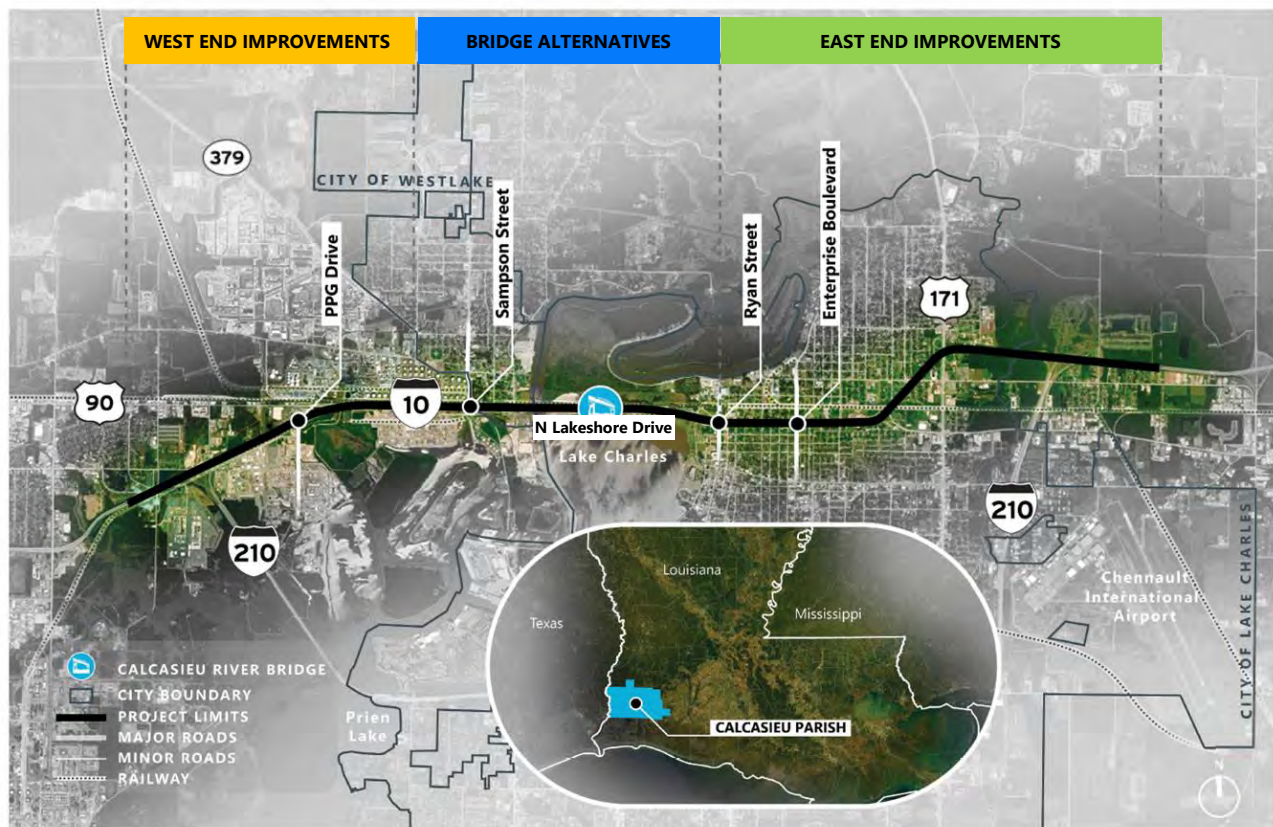


Figure 1: Project Location

1.1. Project Description

The interstate is a control of 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 project length is approximately nine (9) miles and includes the interstate roadways and ramps, the bridge approaches, the I-10 service roads, and interchanges at PPG Drive, LA 378 (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 the interstate within the project limits 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 system would include several overpasses, interchange ramps, and service roads to ensure that the vertical clearance, horizontal alignment, acceleration, deceleration, and weaving distances, and other road and bridge elements meet current design guidelines. To accommodate six lanes of I-10 under US 171, the overpass would be reconstructed but the existing loop ramps would not be improved.

1.2. Purpose and Need for the Project

The purpose of the I-10 Calcasieu River Bridge Improvements Project is to

- (a) Address the lack of system continuity on I-10 and along Sampson Street;
- (b) Reduce congestion and improve mobility on I-10 and along Sampson Street;
- (c) Address structural and functional roadway and bridge deficiencies; and
- (d) Address safety concerns on I-10 and the Calcasieu River Bridge.

1.2.1. System Continuity

System continuity means that a roadway or section of roadway, is consistent in geometric design within similar contexts. I-10 between I-210 West End and I-210 East End is in an urban area. The number of through lanes varies from two to three in each direction. The inconsistency in the number of through lanes makes driving on this section of the interstate unpredictable, interrupting the steady flow of traffic that is expected on control of access highway. Changes in vertical grades and horizontal curves cause driving speeds to vary, another issue that has been addressed by the proposed Project to the extent practicable.

1.2.2. Congestion and Mobility

Traffic congestion and mobility on I-10 is an issue in the existing condition that is expected to get worse in the future. The traffic analysis reported that the Level of Service (LOS) in the future would be at its worst for westbound (WB) traffic in the morning peak (see Figure 3 in Chapter 1 of the DEIS), and in both the WB and eastbound (EB) directions in the evening peak. The proposed Project would improve these conditions.

As the main connection to the interstate from the City of Westlake, Sampson Street is already seriously congested during peak travel times—morning and evening hours when people are commuting to work. Design of the Sampson Street interchange with short ramp acceleration and deceleration lengths and sharp ramp curves also creates a bottleneck at the EB on-ramp to I-10 that has the potential to reach the interstate. Two at-grade railroad tracks that cross Sampson Street north of I-10 and two spur tracks that converge and cross the road near the intersection of Sampson Street and the I-10 Service Road, block drivers randomly during the day. Proximity to the I-10 Calcasieu River Bridge, compounded by disruptions from train events, will make congestion on the interstate and Sampson Street much worse in the future.

1.2.3. Structural and Functional Conditions

Structural and functional roadway and bridge conditions must be addressed. The I-10 Calcasieu River Bridge was rehabilitated in 2011-2012, extending its life expectancy, and some of the functional issues have been addressed to the extent possible. But partial measures are no longer economically reasonable, and additional changes in the geometries, heights, or widening are not physically possible. Although rehabilitated, the bridge does not meet current design guidelines, and improvements are needed for it to effectively handle future projected traffic growth.

1.2.4. Safety Concerns

An analysis of existing conditions conducted in 2019 determined that the average number of crashes in the I-10 Calcasieu River Bridge Improvements Project corridor surpassed statewide averages for crashes on multi-lane highway facilities in Louisiana by approximately 66 percent overall. As shown on **Figure 7** in Chapter 1 of the DEIS, a high concentration of crashes occurred along the corridor in the middle of the project area. The highest concentrations of crashes were found at the bridge approaches and at the Sampson Street interchange. The safety analysis also indicates that the lack of shoulders, narrow travel lanes, and substantial changes in elevation (grade) along the I-10 Calcasieu River Bridge likely contribute to the higher-than-expected number of crashes experienced in this part of the corridor. Features such as the length and number of acceleration and deceleration lanes, shoulder widths, vertical grades, and railroad and roadway conflicts have been addressed by the proposed Project to the extent practicable.

1.3. Alternatives Analysis

After a screening process was conducted concurrently with public and agency involvement, three alternatives were recommended for detailed evaluation in the DEIS: Alternative 3A, Alternative 3E, and Alternative 5G (see Chapter 2 of the DEIS for a detailed alternatives analysis). The horizontal alignment of these alternatives is generally the same at either end of the project corridor (the West End Section and the East End Sections shown on **Figure 1**). The differences among them, illustrated on **Figure 2**, are in the section of the project corridor designated as the Bridge Alternatives Section identified on **Figure 1** between Sampson Street and North Lakeshore Drive.

As shown on **Figure 2**, Alternatives 3A and 3E would extend Sulphur Avenue across the Calcasieu River on a movable bridge connecting to I-10 at North Lakeshore Drive. Alternatives 3A and 3E were developed to provide alternate routes for some drivers to avoid the two railroads that cross Sampson Street. Alternative 3A would allow drivers to enter I-10 to travel east and exit I-10 to travel west. Alternative 3E would allow drivers to enter and exit I-10 in both directions. The existing Sampson Street would remain at grade. The number of vehicle/railroad crossing conflicts would be reduced but not completely eliminated. Alternative 5G does not propose an extension of Sulphur Avenue. It would eliminate the vehicle/railroad crossing conflicts by elevating Sampson Street from Sulphur Avenue to connect with I-10 at a new interchange on structure. To build the proposed elevated interchange, two railroad spurs that cross under the existing bridge would have to be relocated. Three options for these spur relocations (see **Figure 2**) were considered. Railroad Relocation Option 2 was selected as the best solution.



Figure 2: Alternative 3A (top), Alternative 3E (middle), and Alternative 5G (bottom) Alignments

Note: Alternative 5G (bottom) would include a railroad spur relocation. Of three options considered, Option 2, which avoids impacts to a residential neighborhood was selected as the preferred option. All three build alternatives would replace the existing bridge with a new structure to the north, impacting a strip of commercial establishments and two parking lots on the east side of the river.

1.4. Environmental Justice Effects and Mitigation

An Executive Order (E.O.) 14096—Revitalizing Our Nation’s Commitment to Environmental Justice for All has been recently enacted (April 21, 2023). Per Council on Environmental Quality (CEQ) directions, the new E.O. 14096 on environmental justice does not rescind E.O. 12898, which FHWA is implementing through the current DOT and FHWA EJ Orders (DOT 5610.2C and FHWA 6640.23A) until further guidance is provided regarding the implementation of the new E.O. on environmental justice. E.O. 12898, entitled “Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations,” mandates that federal agencies identify and address, as appropriate, the disproportionately high and adverse human health or environmental effects (including social and economic effects) of their programs on minority and low-income populations. The US Department of Transportation (USDOT) Environmental Justice Order 5610.2(c) is an update to Order 5610.2(a) which sets forth the policy to consider environmental justice (EJ) principles in all USDOT programs, policies, and activities. Federal Highway Administration (FHWA) Order 6640.23A — FHWA Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, as well as FHWA Guidance on Environmental Justice and National Environmental Policy Act (NEPA) Memorandum dated December 15, 2011, supplements the existing guidance on compliance with the principles of EJ.

Explicit consideration of potential effects on minority and low-income populations is required in NEPA documents. This technical memorandum has been prepared in compliance with these laws and guidance documents to identify and determine the beneficial and adverse effects on minority and low-income populations in particular that need to be addressed.

Disproportionately high and adverse effects (DHAEE) on minority and low-income populations is defined as adverse effects that:

- are predominantly borne by a minority population and/or a low-income population; or
- will be suffered by the minority population and/or low-income population and is appreciably more severe or greater in magnitude than the adverse effect that will be suffered by the non-minority population and/or non-low-income population.

Under the National Environmental Policy Act (NEPA), consideration must be given to mitigation (as defined in 40 CFR 1508.1(s)) for all adverse effects regardless of the type of population affected. Measures being considered for alternatives to avoid or mitigate the adverse effects follow the protocol of avoidance first, then minimization, and finally measures to offset or rectify the adverse effects for all populations. These measures are detailed in the DEIS. Opportunities to enhance and increase sustainability in communities and neighborhoods and other activities that demonstrate sensitivity to special needs have also been considered. This technical memorandum focuses on mitigation measures for adverse effects on minority and low-income populations, collectively defined as EJ communities, and determines whether, after taking benefits and mitigation into account, these are DHAEE.

1.5. Funding

In 2019, the State of Louisiana made a commitment of \$85 million in state funding to match dollars that will be needed to complete the environmental review and initiate alternative delivery for the I-10 Calcasieu River Bridge Improvements Project. In 2021, \$30 million of the 2020 Coronavirus Response and Relief Supplemental Appropriations Act monies received for roads and infrastructure was

earmarked for the I-10 Calcasieu River Bridge. In 2023, after publication of the DEIS, an additional \$150 million was granted by the federal government for the Project.

The cost to build the first phase of the Project approaches \$1.5 billion. Therefore, current allocations are not sufficient, and additional funding will continue to be sought to fill the budget gaps. Tolling is being evaluated as a new revenue source to finance the first phase of the proposed Project that includes the bridge, which is a significant portion of the construction cost. The I-10 Calcasieu River Bridge Improvements Project proposes tolling any bridge crossing the Calcasieu River within the Project corridor using all-electronic means to collect the tolls. Consideration of who bears the burden of tolling, who benefits from improved mobility, and how revenues are used, has been discussed. While all income groups value the time savings and greater reliability for certain trips due to implementing tolling facilities, the specific focus of the EJ tolling analysis is the effect on low-income populations.

2. Environmental Justice Analysis

Title VI of the Civil Rights Act of 1964 (Title VI) states that

No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

Executive Order (EO) 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, states that each federal agency

shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations. (Office of the President 1994).

Minority persons include citizens or lawful permanent residents of the United States who are African-American, Hispanic or Latino, Asian-American, American Indian, or Native Alaskan. Low-income persons are defined as those whose household income is below the U.S. Department of Health and Human Services (DHHS) poverty guidelines.

EO 12898 and Title VI are implemented at the federal level by individual federal departments. Upon the issuance of EO 12898, the USDOT, developed guidance to comply with the order. USDOT guidance was finalized in 1997 and most recently updated in May 2021. USDOT's most recent order on implementing EJ requirements (USDOT Order 5610.2C), states that:

It is the policy of [US]DOT to promote the principles of environmental justice (as embodied in the Executive Order) through the incorporation of those principles in all [US]DOT programs, policies, and activities. This will be done by fully considering environmental justice principles throughout planning and decision-making processes in the development of programs, policies, and activities, using the principles of NEPA, Title VI, the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (URA), the Fixing America's Surface Transportation Act, Pub. L. No 114-94, (FAST Act) and other DOT statutes, regulations and guidance that address or affect

infrastructure planning and decision-making; social, economic, or environmental matters; public health; and public involvement. (USDOT, May 16, 2021))

FHWA implemented the USDOT order via FHWA Order 6640.23A, FHWA Actions to Address Environmental Justice in Minority Populations and Low-Income Populations (FHWA 2012). The order provides methods to comply with existing applicable regulations and to identify and avoid discrimination and DHAЕ on minority populations and low-income populations by:

- identifying and evaluating environmental, public health, and interrelated social and economic effects of FHWA programs, policies, and activities;
- proposing measures to avoid, minimize, and/or mitigate disproportionately high and adverse environmental or public health effects and interrelated social and economic effects, and providing offsetting benefits and opportunities to enhance communities, neighborhoods, and individuals affected by FHWA programs, policies, and activities, where permitted by law and consistent with EO 12898;
- considering alternatives to proposed programs, policies, and activities where such alternatives would result in avoiding and/or minimizing disproportionately high and adverse human health or environmental impacts, where permitted by law and consistent with EO 12898; and
- providing public involvement opportunities and considering the results thereof, including providing meaningful access to public information concerning the human health or environmental impacts and soliciting input from affected minority populations and low-income populations in considering alternatives during the planning and development of alternatives and decisions.

For purposes of identifying minority populations, the following definitions are found in the Appendix to Environmental Justice Order 5610.2(c):

Definition 1.b states that

Low-income person means a person whose median household income is at or below the Department of Health and Human Services (DHHS) poverty guidelines.

Definition 1.c states that

Minority person means a person who is: 1. Black: a person having origins in any of the black racial groups of Africa; 2. Hispanic or Latino: a person of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race; 3. Asian American: a person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent; 4. American Indian and Alaskan Native: a person having origins in any of the original people of North America, South America (including Central America), and who maintains cultural identification through tribal affiliation or community recognition; or 5. Native Hawaiian and Other Pacific Islander: people having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

Definition 1.d states that

Low-Income Population means any readily identifiable groups of low-income persons who live in geographic proximity, and, if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who would be similarly affected by a proposed FHWA program, policy, or activity.

Definition 1.e states that

Minority Population means any readily identifiable group of minority persons who live in geographic proximity, and, if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who would be similarly affected by a proposed FHWA program, policy, or activity.

2.1. Identifying Low-Income Populations

Data from the American Community Survey (ACS) 5-Year estimates for the years 2016-2020 was collected and compiled to determine the median household income Census Block Groups in the project corridor (see **Table 1**). Median household income for the state, parish, and two Project corridor cities were included for reference.

Table 1: Median Household Incomes 2020

	Median Household Income in 2020\$
State of Louisiana	52,087
Calcasieu Parish	48,219
City of Lake Charles	44,785
City of Westlake	55,963
East End Section	
Census Tract 1, Block Group 1	22,426
Census Tract 2, Block Group 1	21,177
Census Tract 2, Block Group 2	34,500
Census Tract 4, Block Group 1	15,750
Census Tract 4, Block Group 2	20,819
Census Tract 14.01, Block Group 1	Not Provided for This Block Group
Census Tract 14.01, Block Group 2	30,902
Census Tract 14.02, Block Group 1	82,861
Census Tract 14.02, Block Group 3	Not Provided for This Block Group
Census Tract 15, Block Group 1	23,405
Census Tract 15, Block Group 2	24,275
Census Tract 16, Block Group 4	54,943
Bridge Alternatives Section	
Census Tract 5, Block Group 1	100,063
Census Tract 26, Block Group 3	55,843
West End Section	
Census Tract 32, Block Group 1	52,417
Census Tract 27.02, Block Group 2	36,799

Source: American Community Survey 5-Year Estimates (2016-2020), Table B19013

Table 2 lists the DHHS poverty guidelines for the 48 contiguous states and the District of Columbia for the year 2020.

Table 2: DHHS Poverty Guidelines 2020

Household/Family Size	Median Annual Household/Family Income Poverty Guidelines for 2020
1	\$ 12,760
2	\$ 17,240
3	\$ 21,720
4	\$ 26,000
5	\$ 30,680
6	\$ 35,160
7	\$ 39,640
8	\$ 44,120
Add for Each Additional Person	\$ 4,480

Source: US Department of Health and Human Services (<https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines/prior-hhs-poverty-guidelines-federal-register-references/2020-poverty-guidelines>)

Table 3 lists the median household income by household size for the Project corridor Census tracts from the ACS. The data listed is by Census tract because these data are not provided by Block Group. Comparing median incomes to the DHHS poverty guidelines, two Census tracts contain low-income persons per the Environmental Justice Order 5610.2(c), Definition 1.b. The qualifying household median incomes are shaded in the table and illustrated on **Figure 3**.

Table 3: Median Household Income by Household Size for the Project Corridor Census Tracts, 2016-2020.

	Total	1-person Households	2-person Households	3-person Households	4-person Households	5-person Households	6-person Households	7-or-more-person Households
Census Tract 1	41,458	-	-	-	-	-	-	-
Census Tract 2	21,441	21,039	44,271	32,583	-	-	-	-
Census Tract 4	19,286	11,667	19,464	-	-	-	-	-
Census Tract 14.01	22,219	30,979	-	28,929	14,935	-	-	-
Census Tract 14.02	46,439	13,641	250,000+	-	-	40,284	-	-
Census Tract 15	24,159	16,661	24,764	89,167	-	-	-	-
Census Tract 16	30,665	17,188	31,596	62,222	-	-	-	-
Census Tract 5	64,940	46,500	97,500	-	-	250,000+	-	-
Census Tract 26	55,698	20,195	55,912	37,233	73,946	-	-	-
Census Tract 32	57,065	39,250	53,125	-	-	136,548	-	-
Census Tract 27.02	52,290	20,671	50,371	70,825	70,542	72,266	-	-

Source: American Community Survey 5-Year Estimates (2016-2020), Table B19019

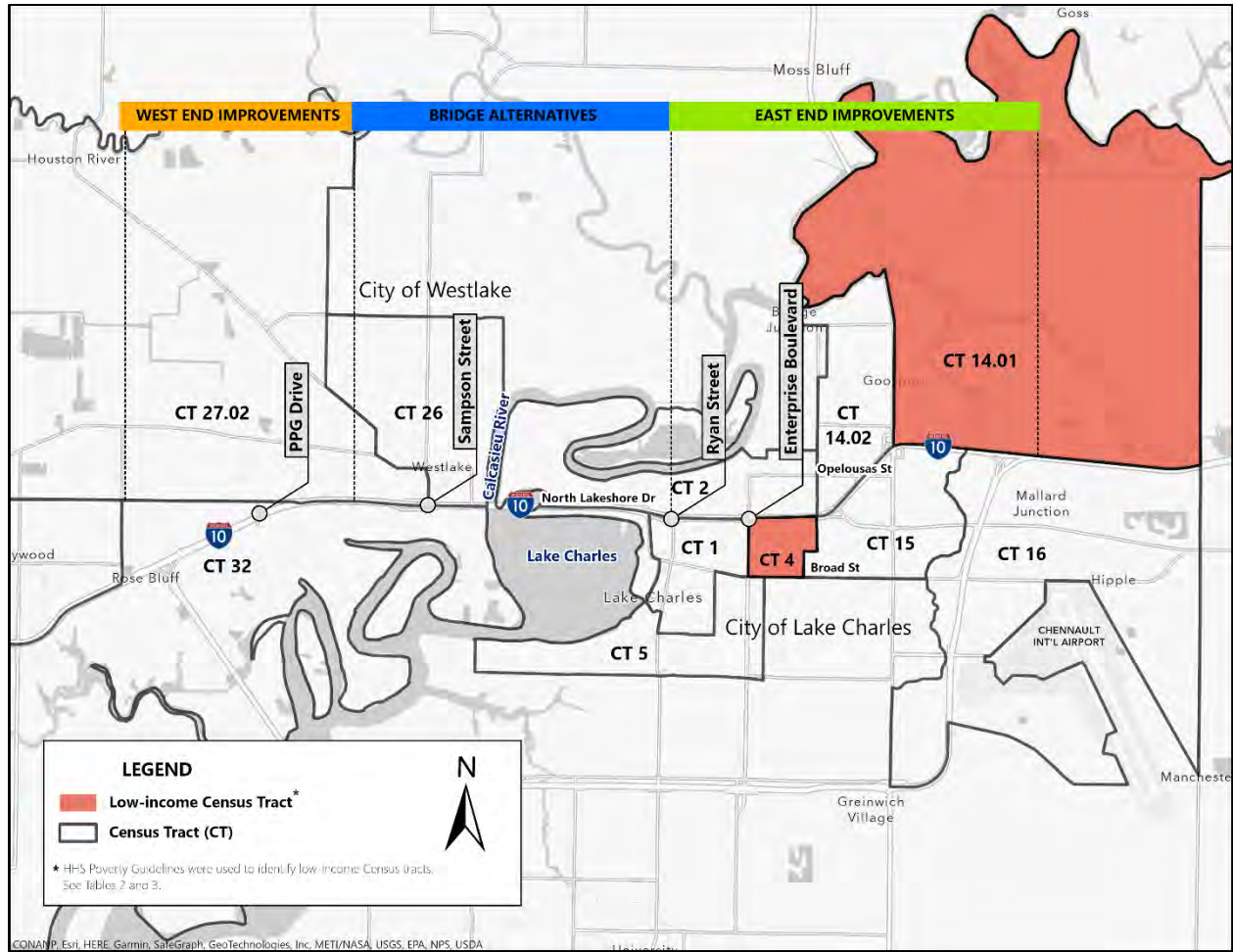


Figure 3: Low-Income Census Tracts

2.2. Identifying Minority Populations

Data from the ACS 5-Year Estimates was collected and compiled as shown in **Table 4**.

Table 4: Race and Ethnic Identity of Populations in the Project Corridor

	Total Estimated Population	Hispanic, any race	Not Hispanic or Latino					
			White	Black or African Origin	American Indian / Alaskan Native	Asian	Native Hawaiian / Pacific Islander	Other / Combination of Races
State of Louisiana	4,664,616	243,372	2,720,638	1,489,071	23,328	79,976	1,527	106,704
Calcasieu Parish	202,858	7,770	135,772	50,878	475	3,005	0	4,958
City of Lake Charles	77,832	2,658	34,196	37,227	135	1,806	0	1,810
City of Westlake	4,788	74	3,379	1,101	52	73	0	109
East End Section	10,740	185	2,582	7,213	34	14	0	694
Census Tract 1, Block Group 1	854	3	317	489	21	14	0	10
Census Tract 2, Block Group 1	1,249	29	0	1,139	0	0	0	81
Census Tract 2, Block Group 2	344	34	43	242	13	0	0	12
Census Tract 4, Block Group 1	460	0	14	446	0	0	0	0
Census Tract 4, Block Group 2	490	0	26	463	0	0	0	1
Census Tract 14.01, Block Group 1	1,738	92	1,606	9	0	0	0	13
Census Tract 14.01, Block Group 2	643	0	74	320	0	0	0	249
Census Tract 14.02, Block Group 1	1,199	0	0	1,199	0	0	0	0
Census Tract 14.02, Block Group 3	593	0	0	593	0	0	0	0
Census Tract 15, Block Group 1	1,131	0	67	1,059	0	0	0	5
Census Tract 15, Block Group 2	633	27	236	345	0	0	0	25
Census Tract 16, Block Group 4	1,406	0	199	909	0	0	0	298
Bridge Alternatives Section	2,592	53	2,048	478	0	0	0	13
Census Tract 5, Block Group 1	1,665	37	1,606	9	0	0	0	13
Census Tract 26, Block Group 3	927	16	442	469	0	0	0	0
West End Section	1,813	16	1,379	397	0	7	0	14
Census Tract 27.02, Block Group 2	851	16	543	292	0	0	0	0
Census Tract 32, Block Group 1	962	0	836	105	0	7	0	14
Project Corridor Block Groups	15,145	254	6,009	8,088	34	21	0	721

Source: American Community Survey 5-Year Estimates (2016-2020), Table B03002

Note: Shaded areas rows identify geographies with minority populations greater than 50 percent.

Based on these data, the Project corridor population within the areas illustrated is estimated to be 60 percent minority compared to Lake Charles at 56 percent, Westlake at 29 percent, and Calcasieu Parish at 33 percent. Minority persons are located in all the Project corridor Block Groups, but the distribution of these individuals is not uniform. As shown on **Figure 4**, the higher proportion of minority persons are located in the East End Improvements section from Ryan Street to US 171.

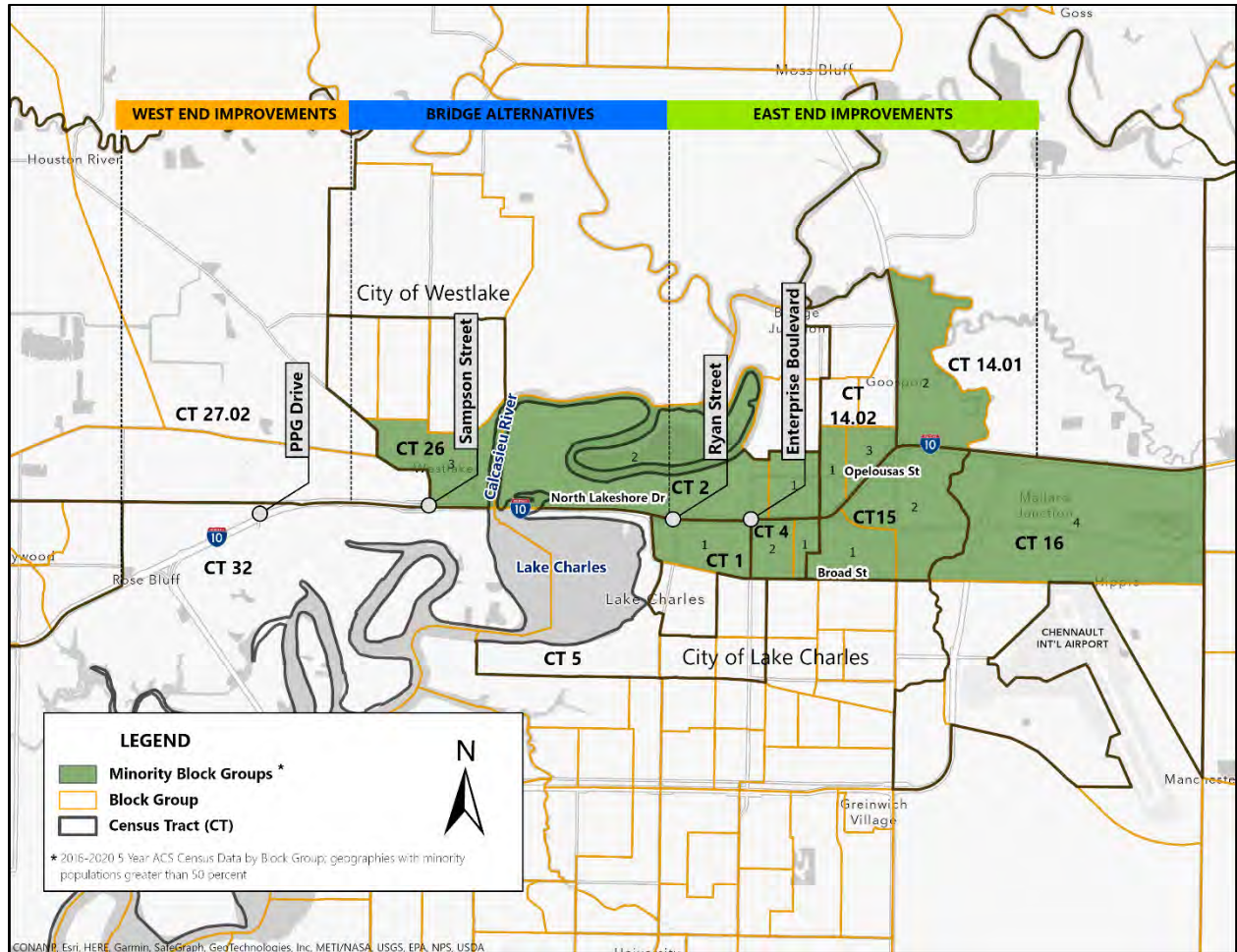


Figure 4: Minority Block Groups

2.3. Identifying the Reference Community

Combining low-income and minority geographies as identified above, all of the Block Groups in the East End Section are designated as EJ communities for purposes of the EJ analysis. These communities are illustrated on **Figure 5**.

Although Census Tract 14.01, Block Group 1 is not identified as minority in **Table 4**, the overall Census Tract 14.01 does contain persons below the DHHS poverty guidelines (**Table 3**). Therefore, this geographic area is considered as an EJ community for purposes of the EJ analysis.

The remaining three Block Groups—Census Tract 5, Block Group 1; Census Tract 27.02, Block Group 2; and Census Tract 32, Block Group 1—are designated as non-EJ communities for purposes of this analysis. These three geographies are used as the reference community to compare impacts from the proposed Project between EJ and non-EJ communities in order to make a determination of DHAE on EJ communities.

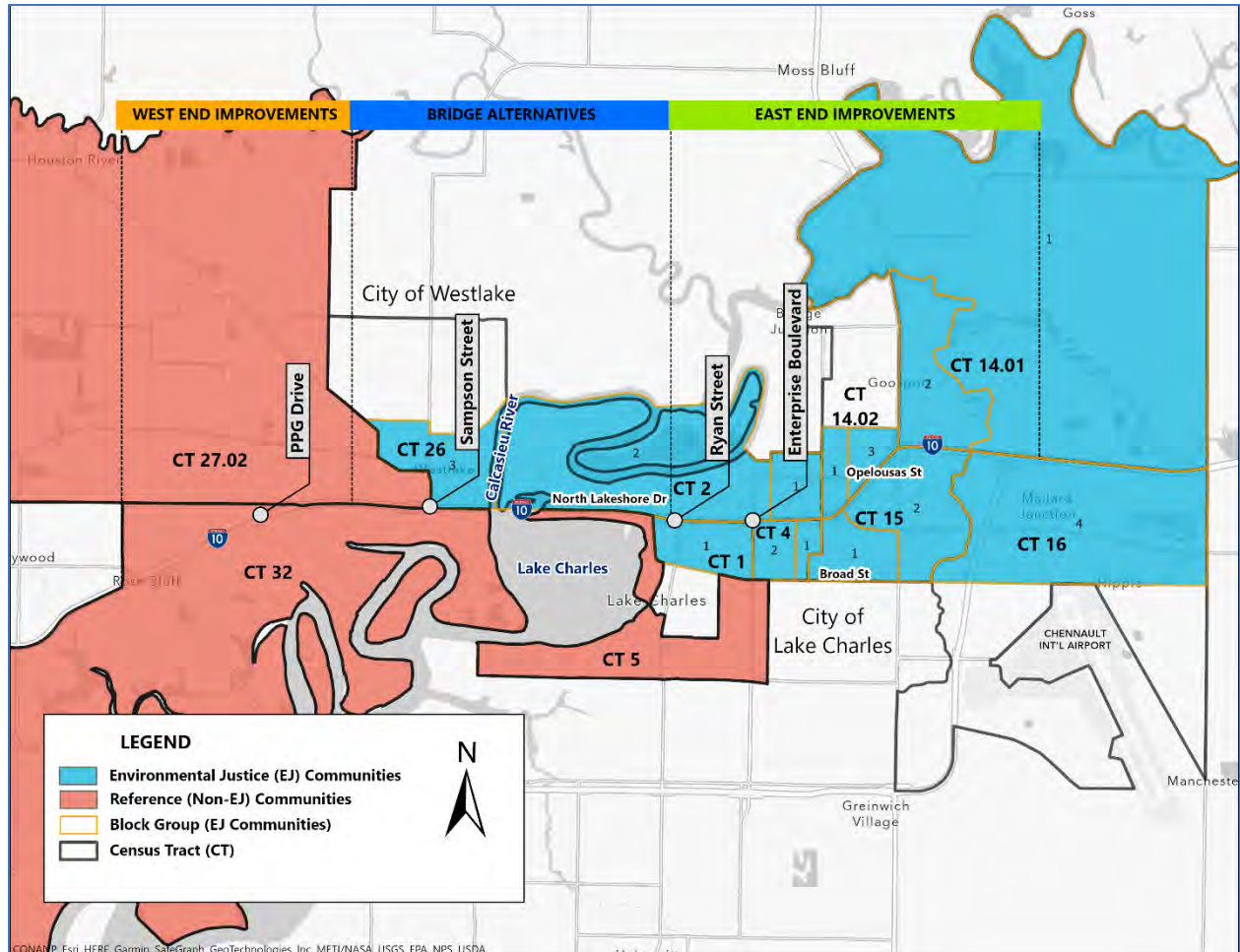


Figure 5: Census Tract Block Groups in the EJ and Reference Communities

Data from the project corridor was also downloaded from the US EPA’s Environmental Justice Screening and Mapping Tool (EJ Screening Tool) for the five years from 2015-2019, the latest years available. A composite EJ Screening ACS Summary Report of the cities and several Block Groups is provided for comparison as **Attachment A**.

USDOT also provides a mapping tool that identifies historically disadvantaged communities based on factors provided by a number of federal agencies. This tool can be accessed at the following link: (<https://usdot.maps.arcgis.com/home/item.html?id=de9979007ae24a25845e84e21d5a32d4>). The map prepared using this tool (shown on **Figure 6**) identifies all the Project corridor Census tracts shown in blue that are identified as historically disadvantaged communities. Only Census Tract 5, Block Group 1 is not designated as disadvantaged.

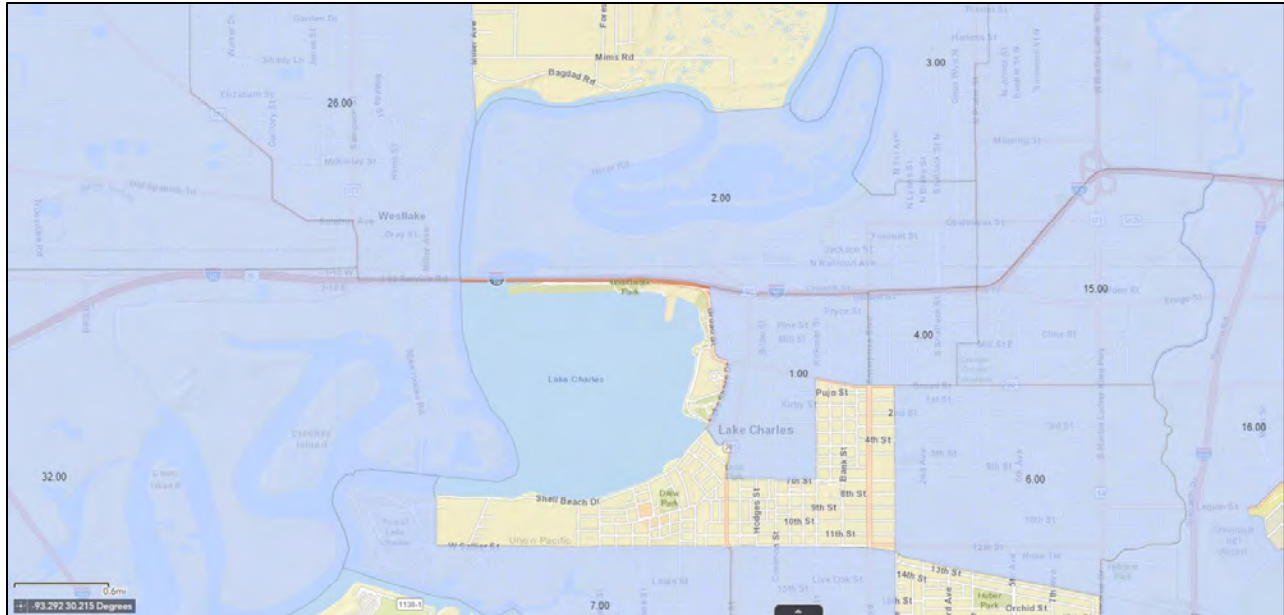


Figure 6: Historically Disadvantaged Communities identified using the USDOT Mapping Tool

2.4. Environmental Justice Analysis

This technical memorandum focuses on the beneficial and adverse effects on the EJ communities identified. The beneficial and adverse effects on the overall population are addressed in the DEIS. Most of the Project corridor is identified as minority. Based on DHHS poverty guidelines, three Block Groups identified in **Section 2.3** and on **Figure 5** are not EJ communities for purposes of this analysis. Census Tract 5, Block Group 1 is located in Lake Charles encircling the lake. Census Tract 27.02, Block Group 2, and Census Tract 32, Block Group 1, encompass parts of Westlake to the south but are mostly located in unincorporated areas of Calcasieu Parish.

2.4.1. Community Cohesion and Connectivity

Community cohesion is defined as the degree to which residents have a sense of belonging to their neighborhoods, a level of commitment to the community, and/or a strong attachment to neighbors, groups, and institutions usually because of continued association over time. Cohesion refers to the degree of interaction among the individuals, groups, and institutions that make up a community. Community cohesion was assessed using information collected from residents, community leaders, and stakeholder organizations. Research of historical records, online data, and social media platforms was also undertaken to discover additional information about neighborhood cohesion and discover shared histories or stories. Contact with neighborhood civic associations, crime prevention districts, social clubs, church and school groups, and community organizations was also undertaken to assess community cohesion.

Community connectivity can be qualified by the type of infrastructure needed to make connections. Drivers in a community depend on a network of streets that can be used safely by residents to visit each other, local destinations, and gathering places. Pedestrians, bicyclists, and mobility-device users depend on a network of facilities for the same purposes. Telephone service via landline or cellular phone service is an indicator of the ability of neighbors to connect one-on-one without physically being together. Online communities depend on internet and devices such as cell phones and computers to connect with

each other, and devices with internet connections also allow people to join streamed community events.

Community cohesion and connectivity are correlated with the number of years someone has lived in a community and homeownership, which also correlates with a higher percentage of older residents. Physical conditions within neighborhoods affect community connectivity as well as neighborhood cohesion. Barriers to connectivity may include broken or missing street and sidewalk connections, permeable barriers such as major arterials and highways, fences, and restricted properties that make neighborhood trips difficult or impossible. A deteriorated physical environment can affect community cohesion and connectivity by overshadowing positive aspects of the neighborhood, contributing to fractures between neighbors, attracting crime, and making residents fearful.

ACS data was researched for indicators of community cohesion and connectivity in Block Groups containing these neighborhoods and graphically compared to the City of Lake Charles and the City of Westlake. As shown on **Figure 7**, the East End Block Groups ranked lowest for connectivity indicators of computers and internet. A high percentage of the housing units in all Project corridor EJ communities are connected by telephones.

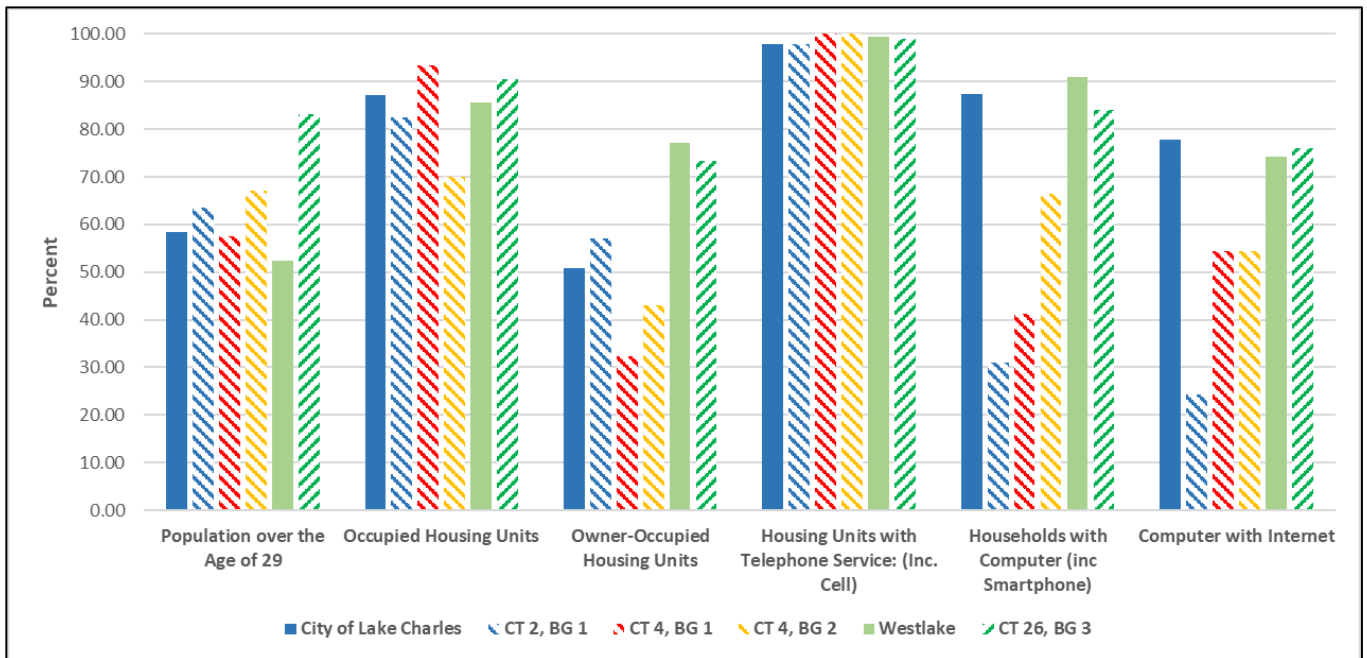


Figure 7: Indicators of Community Cohesion and Connectivity in EJ Census Tract Block Groups
 Source: American Community Survey 5-Year Estimates (2016-2020)

East End Neighborhoods

Neighborhoods identified as EJ communities in the East End Section were assessed for community cohesion and connectivity. These neighborhoods would be similarly affected by any of the build alternatives due to property acquisition for widening of I-10, realigning it, and shifting its service roads, closing local street access, and relocating interstate entrance and exit ramps. Traffic noise is expected to increase, and the use of noise barriers to abate this impact was deemed reasonable and feasible for the area, a benefit to those living close to the highway but with potential negative impacts in terms of visual connectivity.

As shown on **Figure 5**, Census Tract 14.01, Block Group 1 covers a much larger area than other identified EJ Block Groups, and much of the area within the Block Group boundary is sparsely inhabited. Therefore, demographic indicators used to assess community cohesion and connectivity may not correctly characterize neighborhoods north of I-10 that will be directly affected by the proposed Project.

No neighborhood, civic, social, or other organization was identified in the EJ neighborhoods represented by the identified Block Groups. City and parish elected officials, stakeholders, and other public authorities did not identify leaders or neighborhood associations within these areas at any of the public outreach events. No one identified any neighborhoods or subdivisions by name, and no one reported any community facts or stories or raised concerns that would indicate the degree of community cohesion in these neighborhoods.

Research determined that one original subdivision in these Block Groups was named Horridge Addition. Illustrated on F. Shutts' 1895 Map of Lake Charles, along with several other subdivisions, the area ". . . evolved into a neighborhood known as the Dummyline. Bounded by Railroad Avenue, Boulevard (now Enterprise Boulevard), Broad Street, and First Avenue, this area was named after the dummy line that ran along First Avenue connecting the Missouri Pacific and the Southern Pacific railways." By the 1930s, the Dummyline primarily housed blacks and people of Atakapa Indian descent. A similar neighborhood known as Fisherville existed along Goos Street between Railroad Avenue and the Orange Grove Cemetery on Broad Street (CEI 2022), which is the southernmost border of the identified low-income Block Groups.

Research found no additional information about Dummyline, but Fisherville was identified in a 2011 blog post by Vanessa Deggin (<https://vdegginmedia.wordpress.com/tag/fisherville/>). It is also the name of an online community in Lake Charles. In 2011 a rap video called "Walk Thru Fisherville with General Population" was posted on YouTube. Comments on the YouTube page mentioned Sunlight Manor on Winterhalter Street, which is in Census Tract 4, Block Group 1, a location identified as EJ. Sunlight Manor at that location lists 130 apartment units eligible for Section 8 Project-Based Rental Assistance. Several other multifamily buildings are located within the blocks bounded by Winterhalter, Prater, Goos, and Evans Streets. The same commenter mentioned the Evans Street Store and Mr. Mayo, presumably the proprietor. A Facebook Public Group called "Fisherville" was established in 2013 and reports 311 members. Photos and other posts indicate that this group is predominantly African American with a shared history of growing up in Fisherville. Posts on this site also mention a store on Evans Street also known as Mayo's, which research locates at 1925 Evans Street next to the Wiley B. McMillan Community Center and Park. According to a post in April 2022, the store, which was presumably a hang-out for youths in the area, was demolished. The community center and park were renovated in 2018 and via 2022 imagery appear to be well-maintained.

A Facebook Group called "Citizens of North Lake Charles----Be Informed" was created in 2017 by North Lake Charles citizens to keep people up to date on what is going on locally, things they are voting on, taxes, events, important relevant news, public meetings, and to help bring the community closer together. It is a public group with 6,100 members. Michael T. Smith, the Calcasieu Police Juror for District 2, is listed as one of the administrators. The site is very active, with many of the posts related to local businesses, events, and community services. Police Juror Smith's District 2 boundary does not encompass Census Tract 15, Block Group 1, or Census Tract 4, Block Groups 1 and 2, which are identified as EJ. District 2 does encompass portions of other Block Groups identified as minority. "Citizens of North Lake Charles----Be Informed" states its location as Goosport, Louisiana, which is north of I-10 and Fishville, Louisiana (potentially a different name for Fisherville described previously).

Nextdoor, another social media website, was also searched for community information. Neither Fisherville nor Dummyline were found, but two neighborhoods in the identified EJ Block Groups were mapped on the site. Nellie Lutcher District, bordered by Enterprise Boulevard, Belden Street, Broad Street, and 1st Avenue, contains 23 neighbors online. Named in honor of Nellie Lutcher, a blues musician and composer, the area was designated a cultural district in 2007 (<https://www.visitlakecharles.org/things-to-do/arts-entertainment/cultural-districts/nellie-lutcher-cultural-district/>). As shown on photos in **Attachment B**, Enterprise Boulevard has also been named in her honor.

The last two posts on the Nellie Lutcher Nextdoor Group page were dated April 5 and February 8, 2022. No evidence of civic or community engagement was evident in any of the posts, all of which were related to queries about services. The boundaries of a second neighborhood, called Carshop, are generally located around Orange Grove Cemetery and Boston High School from 1st Avenue west to US 171, and Elder Street south to 6th Street. Its northernmost limits are south of Evans Street, where Fisherville is presumably located. This neighborhood contains 38 neighbors. The last posts in May 2022 related to crime, but the posters reported themselves as located in neighborhoods to the south of the corridor study area.

Several residential structures and many vacant structures and lots, particularly in the first-row blocks between Belden (South I-10 Service Road) and Pryce Street and the I-10 Service Road North and Church Street, are in poor condition. This area is where direct impacts from displacements and acquisition of right-of-way (ROW) for the Project would occur. **Attachment B** provides a photolog of images of these neighborhoods and the structures that would be displaced.

Westlake Neighborhood

Figure 5 identifies the boundaries of Census Tract 26, Block Group 3 in Westlake. The neighborhood that would be directly impacted by the proposed Project is bounded by Sampson Street, Sulphur Avenue, the Calcasieu River, and Isle of Capri Boulevard, which is an extension of the I-10 Service Road. This neighborhood is the historic center of the City of Westlake. The bridge structure runs on an alignment parallel to and slightly north of Isle of Capri Boulevard in this area. It is elevated and is high enough to be seen overhead from most points in the neighborhood.

Alternative 3A and Alternative 3E would require ROW from properties abutting Sulphur Avenue and could potentially displace a residence on the Calcasieu River at the end of Sulphur Avenue if the Sulphur Avenue extension (see **Figure 2**) were built. Images of the properties potentially impacted are provided in the photolog in **Attachment C**.

The preferred alternative, Alternative 5G, would not impact any properties on Sulphur Avenue but would require relocation of two railroad spurs in this area. The issue was studied in detail to ensure that impacts to the residential neighborhood between Pilley Street, Kile Street, Hilma Street, and Miller Avenue would be avoided and minimized. Three railroad relocation options considered are illustrated on **Figure 2**. Railroad Relocation Option 2 was identified by LADOTD in coordination with the subject railroads as the preferred option that would minimize impacts to the residential neighborhoods and properties at the riverfront.

Westlake grew on the west bank of the Calcasieu River as a timber town. With construction of the railroad in the late 19th century, the town was firmly established. Two railroads ran through the center of town at this time. The Southern Pacific Railroad and bridge, illustrated on the 1894 and 1903 Sanborn

Fire Insurance Maps and F. Shutts' 1895 Map of Lake Charles, is currently owned and operated by the Union Pacific Railroad (UPRR). The Kansas City Southern (KCS) railroad, illustrated on Shutts' map and the 1903 Sanborn map with a river crossing into Lake Charles (CEI 2022). The KCS bridge no longer exists, and the KCS line currently ends on the west bank of the Calcasieu River in Westlake. In the identified EJ neighborhood, the KCS railroad tracks run next to Pilley Street and the UPRR tracks run south of Railroad Avenue. UPRR reports approximately ten (10) trains per day; KCS reports approximately one train per day.

Development by 1914 extended in a grid from present day Sulphur Avenue to two blocks south of Perkins Street (now Isle of Capri Boulevard) between the Calcasieu River and Magnolia Avenue as the southwestern portion of Old Westlake was too low-lying to be developed (CEI 2022). Due to the railroads, river, and newly constructed canals, Westlake attracted industry, becoming an industrial suburb of Lake Charles by the end of World War II. As a result, residential properties were gradually transformed into industrial sites. Turn-of-the-century homes and streets built by the founding families became company-owned tenant properties. These, in turn, were destroyed and buried by later lake-front industries (CEI 2022).

By 1952, construction of the Calcasieu River Bridge was complete, taking for its ROW the blocks of the town grid between Railroad Avenue and Isle of Capri Boulevard. In 1980, when Westlake was officially named a city, Sampson Street was extended south of Sulphur Avenue to I-10. In 2018-2021, Mayor Robert "Bob" Hardey proposed redevelopment of the blocks of Old Westlake between Miller Avenue, Isle of Capri Boulevard, Sulphur Avenue, and the Calcasieu River. Mayor Hardey died in January 2022 but planning for this initiative continues.

Besides city officials, no organization or social groups were identified as representing the EJ neighborhood that would be directly impacted by the proposed build alternatives. The City of Westlake manages a Facebook page, and Nextdoor lists West Lake as a neighborhood that includes blocks between Sampson Street and the Calcasieu River with its southern limit at Pilley Street. It lists 28 neighbors, but most of the local posts are from a person looking for odd jobs. The longest conversation on the site was about mandatory vaccines in December 2021 and an invitation to join the protest at the City of Lake Charles Council meeting.

A public meeting was held in Westlake in 2019, and a site visit was conducted in 2021. Printed notices inviting residents to the March 2021 virtual meeting were distributed to the residents and businesses on Railroad Avenue, Pilley Street, Hilma Street, Goos Street, Magnolia Street, and Miller Avenue. This targeted outreach provided a Project phone number, email, and website address for community members to use to communicate with the Project team. Three community stakeholders responded to these efforts. The sister of the low-income homeowner of 400 Kile Street came to the 2019 public meeting and has communicated regularly by email with the Project team since that time. She continues to express disaffection with the neighborhood and an eagerness to be relocated into better housing. Homeowners at two properties at Stella Street and Riverside Drive phoned the team prior to the 2021 meeting. These homeowners and/or their representatives have made comments expressing concerns about noise, visual, and other impacts to their properties, which are high value with water access and related amenities. When asked to provide contact information for the next-door neighbor, the family of the homeowner of 400 Kile Street could not identify that person.

As illustrated on **Figure 7**, the rate of occupancy and owner-occupancy and the potential for online community connections is relatively high in the EJ block group in Westlake. However, the target

neighborhood where properties would be directly affected by the proposed Project is in poor condition (see photolog in **Attachment C**). No local business serving these neighborhoods was open at the time of publication of the DEIS. The only commercial structures that appear active are warehouse-like structures. **Attachment C** also documents the commercial structures that would be displaced by the proposed Project, several of which appeared to be inactive at the time the photos were taken.

The Project includes property acquisition for widening of I-10, realigning it, and shifting its service roads, closing local street access for safety reasons per the LADOTD Control of Access policy, and relocating interstate entrance and exit ramps. Traffic noise is expected to increase, and there will be a visual change to I-10 through the EJ neighborhood as it will be an elevated viaduct structure in areas where it currently sits on embankment.

Findings

No evidence of impacts to community cohesion was discovered during research or outreach to the EJ communities. Online groups identifying with a specific community have members who are dispersed throughout the area and do not appear to have a high level of commitment to the community or attachment to one another. One group formed to connect via a shared history and neighborhood events was short-lived when the administrator moved to another state.

A public meeting was held at a community center in Westlake and a public hearing was held at a community center near I-10 in Lake Charles. Flyers were delivered in advance of both meetings. Attendance did not provide any evidence of a high degree of interaction among the individuals in either area. These community centers will not be impacted by the proposed project and will continue to operate without interruption. Based on this information and a lack of response from community leaders and stakeholder organizations, it was determined that the project would not cause a DHAE on community cohesion.

All alternatives include street closures in Westlake at Pilley Street due to at-grade railroad crossing closures and near Enterprise Boulevard at the service roads due to the requirements of the LADOTD access management policies used to improve efficiency and safety on roadways focusing on location, spacing, design of entrances, street intersections, median openings, and traffic signals by minimizing conflict points. The safety benefit of these closures pertains to all users of these streets, many of whom live in the surrounding EJ neighborhoods. The effects of closing these street connections, i.e., creating a dead-end condition on the block immediately adjacent to the closures, would inconvenience residents who drive by causing them to travel--at a minimum 0.15 mile or approximately 800 feet or a maximum of 0.25 mile or approximately 1300 feet--around the block to access the service road. Figure 11 in Section 2.4.5 of this document illustrates the distance that drivers on closed streets would have to travel to access the I-10 service roads. This inconvenience would be offset by the benefit of eliminating cut-through traffic in front of their homes and making the street safer for use by pedestrians, bicyclists, and other vulnerable street users as well as reducing vehicular noise and emissions. The safety benefits of the proposed change in access to all residents in the adjacent EJ Communities far outweigh the inconvenience to drivers in these specific blocks. Therefore, after considering the benefits, this impact is not considered to be a DHAE on community connectivity in EJ Communities.

The Project could potentially result in temporary impacts to community connectivity related to construction activities; however, these temporary impacts would occur along the entire project corridor in both EJ and Non-EJ Communities. Therefore, temporary impacts to community connectivity are not considered to be DHAE.

2.4.2. Acquisition of Right-of-Way

The I-10 Calcasieu River Bridge Improvements Project will require that ROW be acquired to accommodate the addition of travel lanes and realignment of the interstate mainline and access ramps and, in the case of Alternative 3A and Alternative 3E, the extension of Sulphur Avenue across the Calcasieu River to a new interchange at the Lake Charles lakefront. Most of the required ROW consists of frontages or fragments of properties located a few hundred feet beyond the existing ROW. In the EJ communities surrounding Enterprise Boulevard, ROW acquisition is at the edge of physically coherent communities; therefore, ROW acquisition would not split, bisect, or disconnect any existing communities.

ROW for the railroad spur relocation in Westlake would affect commercial properties on both sides of LA 379 (Miller Avenue) (**Figure 8**). However, as shown in **Attachment C** photos, LA 379/Miller Avenue properties are mostly vacant. The only business activity identified on any properties that would be affected is a warehouse. This area has been planned by the City of Westlake for riverfront redevelopment that would use the riverfront as an attraction, and coordination with the city is ongoing.

The most extensive acquisition of ROW would be required for the location of the proposed Calcasieu River Bridge for all three alternatives, impacting a strip of commercial businesses on North Lakeshore Drive and two large parking lots. These properties are located in an EJ block group but, because of their proximity to the interstate, cater to all populations.

This information was presented to the public at four public meetings, and is incorporated into the [Draft EIS](#) issued in November 2022. North Lakeshore business owners including American Fence Inc. and Days Inn were contacted the Project team by telephone to discuss the issue. Neither business owner expressed concern about the need to relocate their businesses. No other comments about relocations were received.

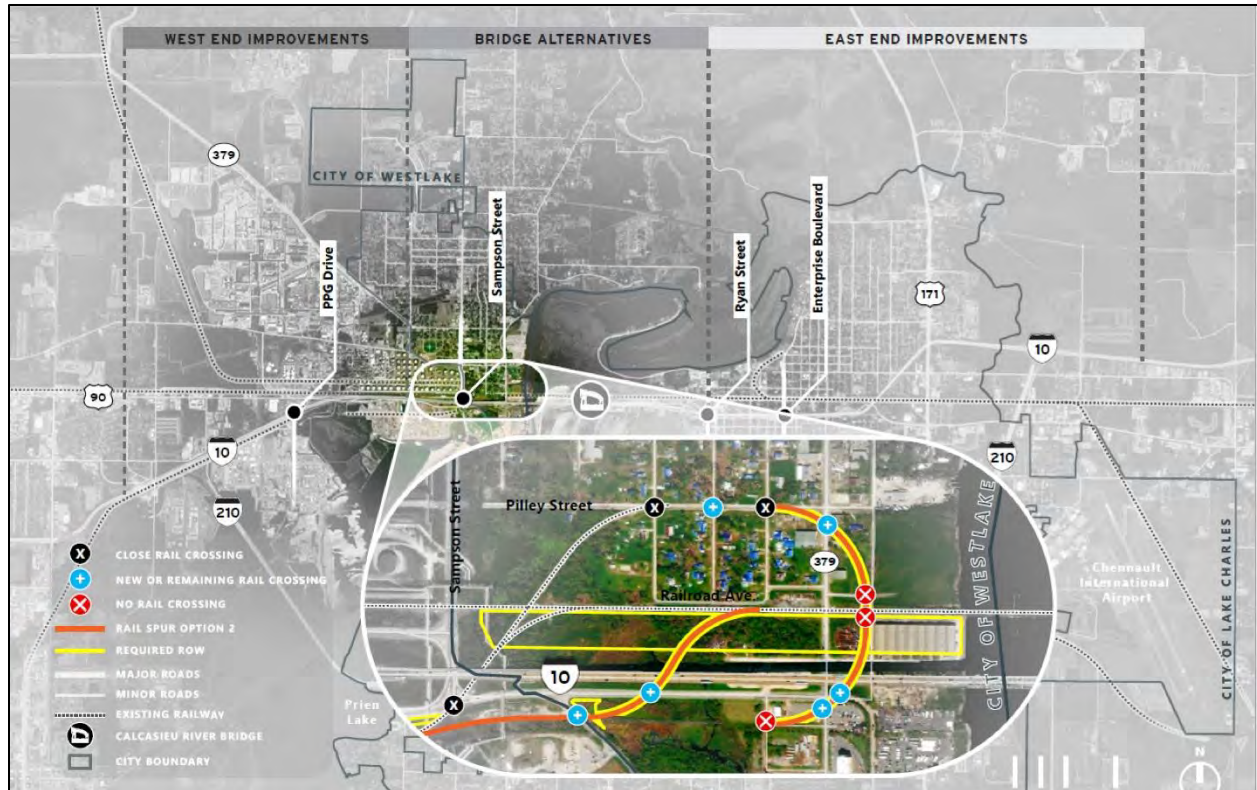


Figure 8: Alternative 5G Railroad Option 2

The acres required for Project right of way is greater in EJ Communities than non-EJ communities. The Louisiana State Constitution goes above and beyond the Uniform Relocation Act (URA) to mitigate for property acquisition impacts. It states that in every expropriation or action to take property, the owner shall be compensated to the full extent of his loss. The full extent of loss 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 because of the expropriation.

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 advance acquisition of property for right of way. According to the manuals, LADOTD may offer advanced acquisition as a hardship acquisition or for protective buying. Hardship acquisitions usually occur when a property owner makes a written request for acquisition of the property in advance of the normal time scheduled for acquisition due to a justifiable hardship on the basis of health, safety or financial issues. As mitigation for the DHAEs from right-of-way acquisition, LADOTD will offer advanced or early acquisition to property owners.

After compensation, the net effect of right-of-way acquisition is considered neutral and is therefore not considered a DHAE. The project team proposes to reach out to members of the EJ Community directly impacted by property acquisition to solicit input and consider their needs regarding the impact and mitigation to confirm this determination.

2.4.3. Displacements

Displacements are quantified by the type of activity that would have to be relocated because acquisition of the property would effectively make that activity impossible at its current location.

Methods to identify the residents and business owners by racial and income status, beyond identifying them through the Census geographic location, included personal communications where the owner or resident initiated the communication, windshield surveys of the neighborhood, and internet searches. Four (4) people who would be impacted by displacements reached out to the Project team. One representative of a business in the North Lakeshore Drive area identified the owners as non-minority. One owner of a motel identified himself as Asian. Two (2) residents in the Westlake EJ community identified themselves as non-minority. However, one of the non-minority residents identified herself as low-income.

An internet search identified a restaurant in the North Lakeshore Drive area as owned by a non-minority woman. This information determined that a total of two displaced businesses and one residence that would be displaced by Alternative 3A and Alternative 3E are not EJ.

In 2022, field surveys noted that one of the potentially displaced residences on Belden Street near Prater Street had been converted to a drive-thru restaurant. This residence is included as a residential displacement but is subject to change if the business continues to be active. Located in Census Tract 15, Block Group 1, this residence/restaurant was identified as being owned by a minority woman. No other information could be obtained regarding ownership of the businesses or racial identity of residents that would be displaced.

The total number of displacements by build alternative and displacements in the identified EJ communities are tallied in **Table 5**. A photo of each displacement can be found in **Attachment B** and **Attachment C** photos. **Table 5** also lists properties verified to be vacant in the draft Conceptual Stage Relocation Plan provided to LADOTD in July 2022.

Table 5: Displacements in EJ Neighborhoods

	Displacements - Residences			Displacements - Businesses		
	Total	EJ	Vacant	Total	EJ	Vacant
Alternative 3A	21	21	5	14	13	1
Alternative 3E	21	21	5	14	13	1
Alternative 5G (RR Option 2)	20	20	5	17	16	2

Figure 9 shows that nearly all the potential displacements will impact residences and businesses within identified EJ communities.

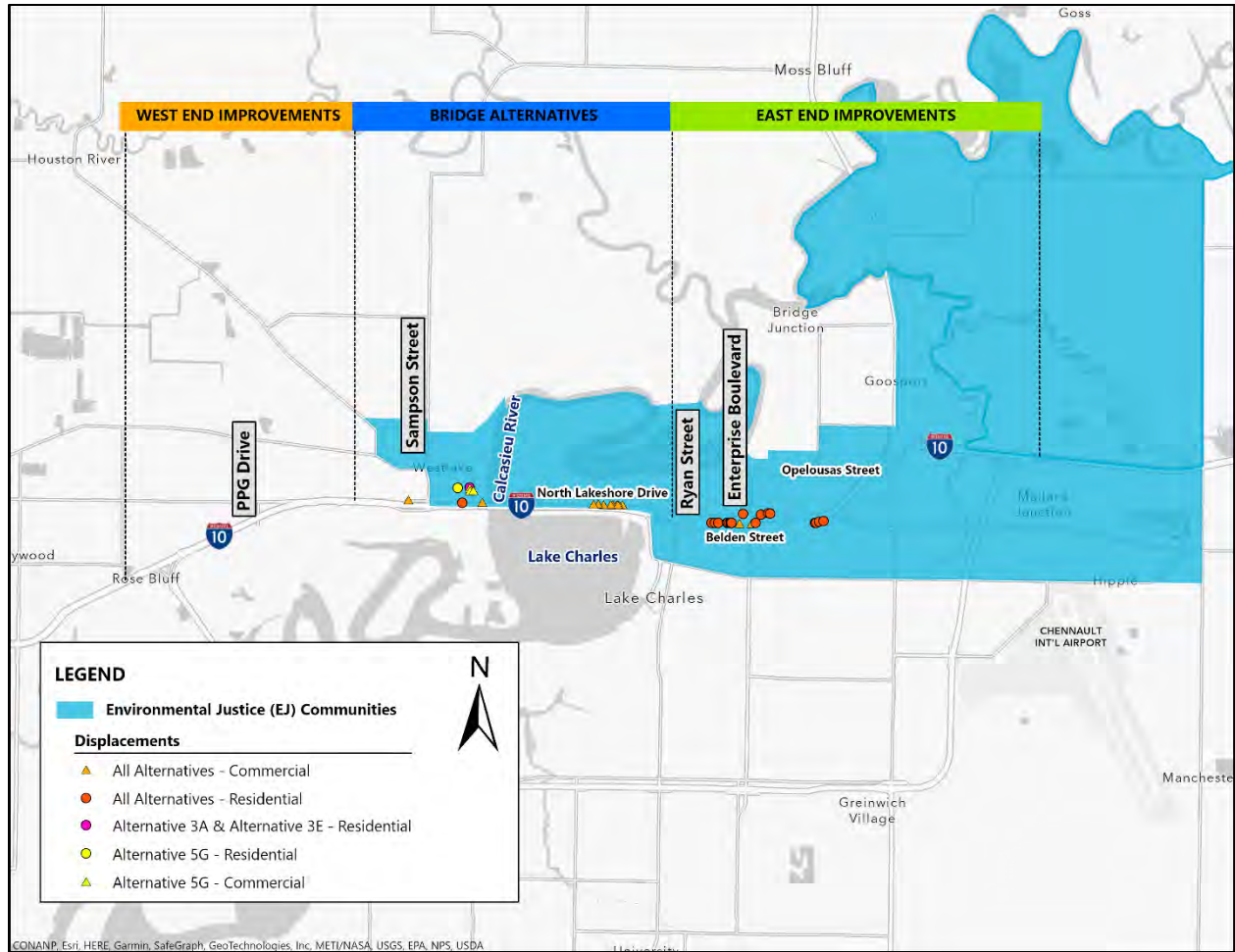


Figure 9: Map of Residences and Businesses Potentially Displaced

The Project includes a greater number of displacements for residential and commercial properties in EJ Communities than non-EJ Communities; therefore, this impact is considered a DHAE. However, the Louisiana State Constitution goes above and beyond the URA to mitigate for property acquisition impacts “. . . to the full extent of [the property owner’s loss] including the appraised value of the property and all costs of relocation, inconvenience, and any other damages actually incurred by the owner.” Louisiana law also guarantees that residents, who are not owners, cannot be required to move unless at least one comparable decent, safe, and sanitary (DSS) replacement dwelling is made available. Renters will receive relocation assistance and counseling as defined in the [LADOTD Right of Way Acquisition and Relocation Assistance Brochure \(2021\)](#).

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 advance acquisition of property for right of way. According to the manuals, LADOTD may offer advanced acquisition as a hardship acquisition or for protective buying. Hardship acquisitions usually occur when a property owner makes a written request for acquisition of the property in advance of the normal time scheduled for acquisition due to a

justifiable hardship on the basis of health, safety or financial issues. 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.

After compensation, the net effect of displacement is considered neutral or, in some cases, an improvement, and is therefore not considered a DHAE. The project team proposes to reach out to members of the EJ Community directly impacted by displacements to solicit input and consider their needs regarding the impact and mitigation of DHAE to confirm this determination. If displaced business owners or residents are interested in maintaining access to current services such as schools, grocery stores, or if they express the need to remain in the same proximity to family members or others that they depend upon for service and support, the relocation process will accommodate these needs to the extent practicable.

2.4.4. Tolling

The FHWA and LADOTD are joint lead agencies for the I-10 Calcasieu River Bridge Improvements Project and share responsibility for preparing the EIS. Upon completion of the EIS, LADOTD will be responsible for delivery of the project design, construction, and operation through a Public-Partnership (P3) arrangement. Development of the P3 contract was initiated in January 2021. In a P3 arrangement, a private entity called a concessionaire invests its own money (known as equity) and borrows additional funds to pay for construction of a highway project. The concessionaire expects to be repaid for its investment in the Project over the period of the concession.

The most common payment mechanism consists of toll concessions, in which the concessionaire receives compensation by obtaining the right to collect the tolls on a facility. This is the mechanism that LADOTD has chosen for the I-10 Calcasieu River Bridge. Currently, no tolls are charged on any section of the Project corridor. The Project proposes to toll travel only across the new bridge (or bridges in the case of Alternative 3A and Alternative 3E). Tolls would be collected for each one-way trip across the bridge (or bridges in the case of Alternatives 3A and Alternative 3E) using toll tags or transponders, and/or license-plate recognition.

Tolling Traffic and Revenue Analysis

In projects in which the primary revenue stream is derived from tolls, the assessment of the value of a toll-based concession will depend on its projections of potential toll revenues. A preliminary financial feasibility analysis to evaluate the viability of delivering bridge improvements through a P3 arrangement was prepared and is available as [Appendix F of the Draft EIS](#). As part of the feasibility study, a planning level traffic and revenue assessment of tolling the I-10 bridge was performed. Key findings of the assessment were used to analyze the effects of tolling on EJ communities.

Census data for EJ geographic areas were overlaid on the Traffic Analysis Zones (TAZ) to determine which trips would represent drivers from EJ communities. Data from the Travel Demand Model developed by the Lake Charles region Metropolitan Planning Organization (MPO) was used to calculate the number of daily trips across the bridge originating from these TAZs for future year 2042.

To accurately forecast the utilization of a toll facility within the regional transportation network, a toll diversion model was developed and incorporated into the Imperial Calcasieu Regional Planning and Development Commission (IMCAL) model, which does not have toll modeling capability, for the I-10 study traffic and revenue analysis. The toll diversion model incorporates willingness to pay (WTP)

methodology into the highway assignment process to help determine a driver’s probability of using a toll facility. Willingness to pay is predicated on an individual’s value of time and potential travel time savings. The methodology does not account for individual or household income level since there are two no-cost alternatives (illustrated on **Figure 10**) that allow for diverting to alternate paths that do not require paying a toll.

These alternate (non-tolled) paths to I-10 (Path 1) are as follows. **Path 2** is a by-pass interstate facility that crosses through urbanized areas of Lake Charles and unincorporated west Calcasieu Parish on I-210 south of I-10. **Path 3** includes US 171 north to Moss Bluff and LA 378 west to Westlake.

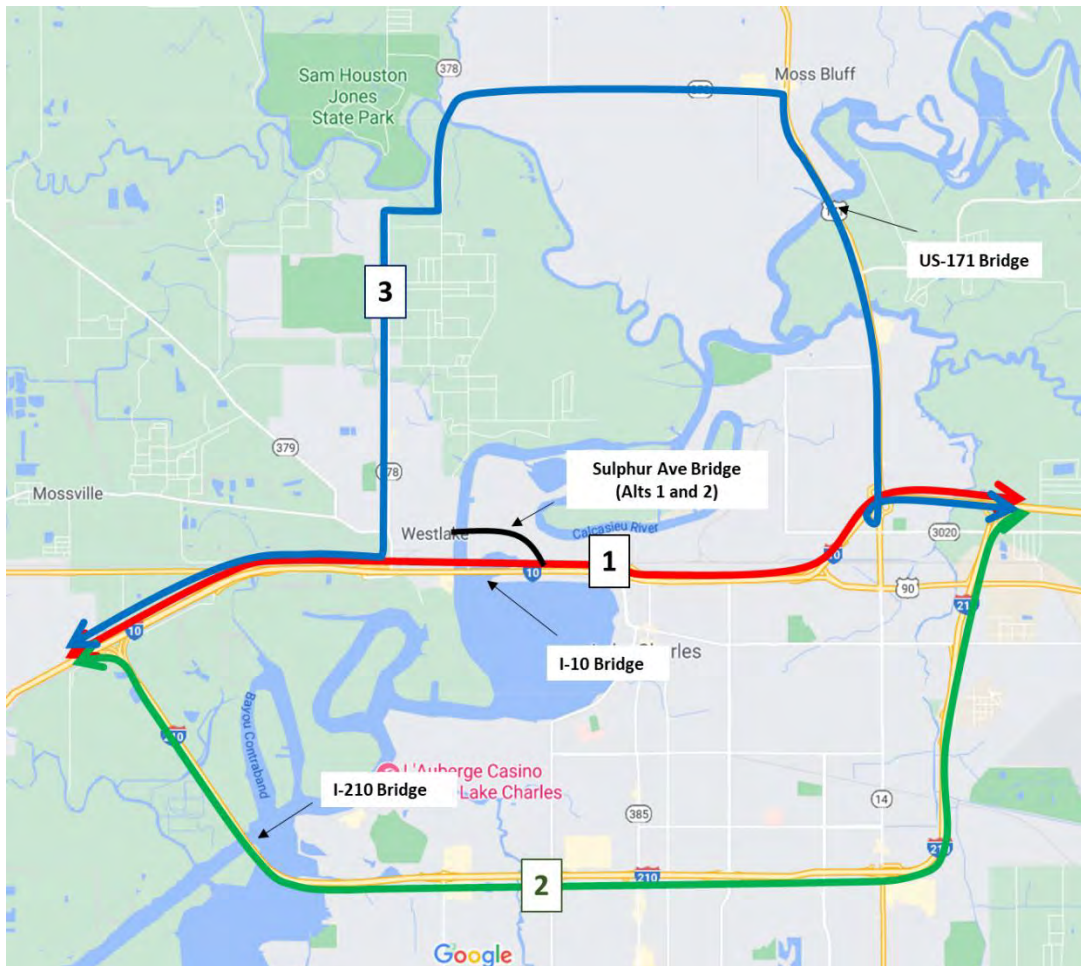


Figure 10: I-10 and Alternate Routes Considered

Table 6 provides a comparison of the distances and travel times for each path across the Calcasieu River. The Sulphur Avenue Bridge depicted is a component of Alternatives 3A and 3E, which would provide a second bridge crossing of the Calcasieu River. The tolling scheme analyzed for these build alternatives would charge a toll for crossing on the I-10 bridge and the Sulphur Avenue bridge. Alternative 5G would provide a single river crossing on I-10, which would be tolled. The two alternate path (**Path 2** and **Path 3**) bridges at US 171 and I-210 would not be tolled.

Table 6: Comparison of Distances and Travel Times

Path	Roadway	Distance (mi)	Time (min)		
			Free-flow	AM Peak	PM Peak
1	I-10	9.6	9.1	12.9	12.8
2	I-210	12.9	12.7	17.7	17.8
3	US 171 & SR 378	16.4	21.6	30.0	30.2
Difference (2 vs 1)		3.3	3.7	4.9	4.9
Difference (3 vs 1)		6.8	12.5	17.2	17.3

Toll rates ranging from \$1 to \$3 per car and \$3 and \$6 per truck were compared along with a variable toll rate for the three build alternatives. The higher toll rates would divert the most traffic but yield the most revenue. Diversion rates and the amount of toll revenue collected among the three alternatives are generally the same.

Economic Burden of Tolls

Effects of tolling including economic impacts and benefits were considered. Community impacts from traffic diversion and loss of access were also evaluated. Air quality effects and noise impacts from tolling were qualitatively compared to the non-tolling conditions analyzed for the build alternatives.

Census data was overlaid on Traffic Analysis Zones (TAZ) within a five-mile radius of the project corridor to locate low-income and minority areas as defined in the Travel Demand Model developed by IMCAL. This model was used to calculate the number of daily trips across the bridge originating from low-income and minority TAZs for future year 2042.

The results determined that 23 percent of daily bridge users would come from low-income TAZs, and 16 percent would come from minority TAZs. These percentages were used to calculate the numbers shown in **Table 7** to compare the number of daily trips across the bridge in the future year 2042 with and without a \$1 toll. As shown, of the 24,195 and 16,955 trips from low-income and minority TAZs, respectively, 4,500 and 3,285 were predicted to divert to a toll-free route. These numbers represent four to three percent of total trips, respectively, and 19 to 17 percent of low-income and minority trips.

Table 7: Number of Daily Trips across the Calcasieu Bridge With and Without Tolls

No Toll			\$1 Toll Scenario		
Total Number of Bridge Trips (2042)	Number of Bridge Trips from Low-Income TAZs (2042)	Number of Bridge Trips from Minority TAZs (2042)	Total Number of Bridge Trips Diverted to I-210 (2042)	Number of Bridge Trips Diverted from Low-Income TAZs (2042)	Number of Bridge Trips Diverted from Minority TAZs (2042)
106,635	24,195	16,955	19,590	4,500	3,285

Table 8 compares the trip times and trip costs on the I-10 Bridge without a toll. This analysis assumes all-electronic toll collection that would not require vehicles to slow down or stop to pay. Because the alternate route to the north (**Path 3**) is almost seven (7) miles and 13-17 minutes longer, it would divert the lowest number of trips. For this reason, the time and cost savings comparisons were conducted for the diversion trip using I-210. As shown, the trips diverted to I-210 would cost \$2.88 more than the I-10 trips based on \$0.52 cost per mile and a \$14 per hour value of time as calculated in the Traffic and Revenue Analysis.

Based on these values, as long as the toll is set at less than \$2.88 per one-way trip (in 2021 dollars), the trip across the tolled I-10 bridge during peak traffic would cost the same as the trip using I-210.

Table 8: Trip Cost Comparison

	Distance	Trip Time (minutes)			Trip Cost (2021\$)			
		Free-flow	AM Peak	PM Peak	Mileage Cost (\$0.52 per mile)	Value of Time (Worst Delay x \$14/hr)	Toll Cost	Total Trip Cost
I-10 Trip No Toll	9.6	9.1	12.9	12.8	\$ 4.99	\$ 2.99	\$ -	\$ 7.98
I-210 Trip	12.9	12.7	17.7	17.8	\$ 6.71	\$ 4.15	\$ -	\$ 10.86
Difference between I-10 and I-210 Trips	3.3	3.6	4.8	5	\$ 1.72	\$ 1.17		\$ 2.88

To understand the economic burden on EJ households from tolling, the median household income of EJ Census Block Groups in the area (see **Table 9**) was used to calculate a median daily household income and compare the trip costs as a percentage. Median household income for the state and parish are included as benchmarks to illustrate that the relative ability to pay of the average household compared to the EJ households of the project corridor. Households in EJ Census tract Block Groups identified in **Section 2.1.** and **Section 2.2.** and on **Figure 5** are shaded in gray.

Table 9: Comparison of Economic Burden on EJ and Non-EJ Households

	Households			Trip Costs as Percent of Median Income			Workers who carpooled
	Number	Annual Median Income	Daily Median Income	I-210	I-10 Without Toll	Increase per \$1 Toll	
State of Louisiana	1,783,924	52,087	\$142.70	7.61%	5.59%	0.70%	10%
Calcasieu Parish	77,130	48,219	\$132.11	8.22%	6.04%	0.76%	8%
Census Tract 5, Block Group 1	783	100,063	\$274.15	3.96%	2.91%	0.36%	22%
Census Tract 32, Block Group 1	392	52,417	\$143.61	7.56%	5.56%	0.70%	12%
Census Tract 27.02, Block Group 2	439	36,799	\$100.82	10.77%	7.92%	0.99%	0%

Note: Shaded areas rows describe EJ Census Tract Block Groups identified on **Figure 5**.

The results presented in **Table 9** show that diverting to I-210 would burden EJ households more than state and parish households. For each \$1 increase in toll rates, the burden on EJ households would

increase by an average of 1.2 percent. At \$2.88, the tolled trip cost would be the same as the non-toll trip using I-210.

Section 129(a) of Title 23 was amended to ensure that

the public authority with jurisdiction over a toll facility that is on the Interstate System and that is constructed or converted after the date of enactment of the Surface Transportation Reauthorization Act of 2021, . . . shall allow . . . transit and para-transit vehicles to use the facility at a discount rate or without charge . . . unless the number of those vehicles using the facility reduces the travel time reliability of the facility.

The Department of Public Works Transit Division provides bus transportation for residents within the City of Lake Charles. Five (5) fixed routes operating within the city limits from 5:45 am to 5:45 pm depart the transit center every 45 minutes after the hour. Two (2) routes serve low-income areas of the project corridor, but Lake Charles transit does not use I-10 or cross the Calcasieu River. Therefore, the Project would not provide any benefit to fixed route transit riders.

The City of Lake Charles does operate a para-transit service for disabled people during the same hours at a cost of \$1 per trip. Service requires a one-day reservation. The Calcasieu Parish Police Jury Office of Community Services offers transit services to residents outside the city limits. The Calcasieu Parish Public Transit system is operated to the public on a response-driven system. Para-transit and on-demand riders traveling across the bridge would be benefited by a time savings on trips crossing the bridge without paying a toll or at a discounted rate. A local toll rate could be as low as 25 cents but will be no more than \$2.88 in 2021 dollars per one-way trip.

The effects of tolling would not be predominately borne by EJ Communities. Rather, these effects will be distributed across all populations in the area. Therefore, tolling is not considered a DHAE.

All Electronic Tolling

All electronic tolling systems, such as the one proposed for the I-10 Calcasieu River Bridge, would normally charge less for vehicles with transponders that can be read as the vehicle passes by at normal speeds. The same system would photograph license plates of vehicles without transponders and send a bill to the vehicle owner of record, a more costly form of toll collection.

The upfront cost of a transponder ranges from \$10 to \$20 and the account is usually loaded with several trips at once. The transponder account may be renewed online, at service centers, or at local retail establishments. Some toll collection systems offer discounts for high-frequency drivers and others for automatic payments by bank draft or credit card.

Low-income users may have greater difficulty obtaining a transponder, accessing a frequent-use pass, or maintaining a transponder account either due to a lack of funds, banking or credit card access, or time limitations. Measures to address these issues including providing toll discounts for eligible residents and promoting wider distribution of transponders will be implemented along with public outreach to educate them on the tolls and toll collection technology. See Table 10 and Table 12 for additional information. Considering these measures, all-electronic tolling is not considered a DHAE for low-income individuals.

Tolling of the bridge is the issue which received the most comments during the public involvement process. These comments came from a broad range of citizens.

2.4.5. Accessibility

All alternatives include street closures in Westlake at Pilley Street due to at-grade railroad crossing closures, and near Enterprise Boulevard at the service roads due to the requirements of the LADOTD access management policies used to improve efficiency and safety on roadways focusing on location, spacing, design of entrances, street intersections, median openings, and traffic signals by minimizing conflict points. The safety benefit of these closures pertains to all users of these streets, many of whom live in the surrounding EJ neighborhoods. The effects of closing the street connections, i.e., creating a dead-end condition on the block immediately adjacent to the closures, would inconvenience residents who drive by causing them to travel--at a minimum 0.15 mile or approximately 800 feet or a maximum of 0.25 mile or approximately 1300 feet--around the block to access the service road.

Figure 11 in **Section 2.4.5** of this document illustrates the distance that drivers on closed streets would have to travel to access the I-10 service roads. This inconvenience would be offset by the benefit of eliminating cut-through traffic in front of their homes and making the street safer for use by pedestrians, bicyclists, and other vulnerable street users as well as reducing vehicular noise and emissions. The safety benefits of the proposed change in access to all residents in the adjacent EJ Communities far outweigh the inconvenience to drivers in the specific blocks. Therefore, after considering the benefits, this impact is not considered to be a DHAE on accessibility in EJ Communities.

The Project could potentially result in temporary impacts to community connectivity related to construction activities; however, these temporary impacts would occur along the entire project corridor in both EJ and Non-EJ Communities. Therefore, temporary changes in access are not considered to be DHAE.

The photolog in **Attachment B** provides a view of each street connection that would be closed.

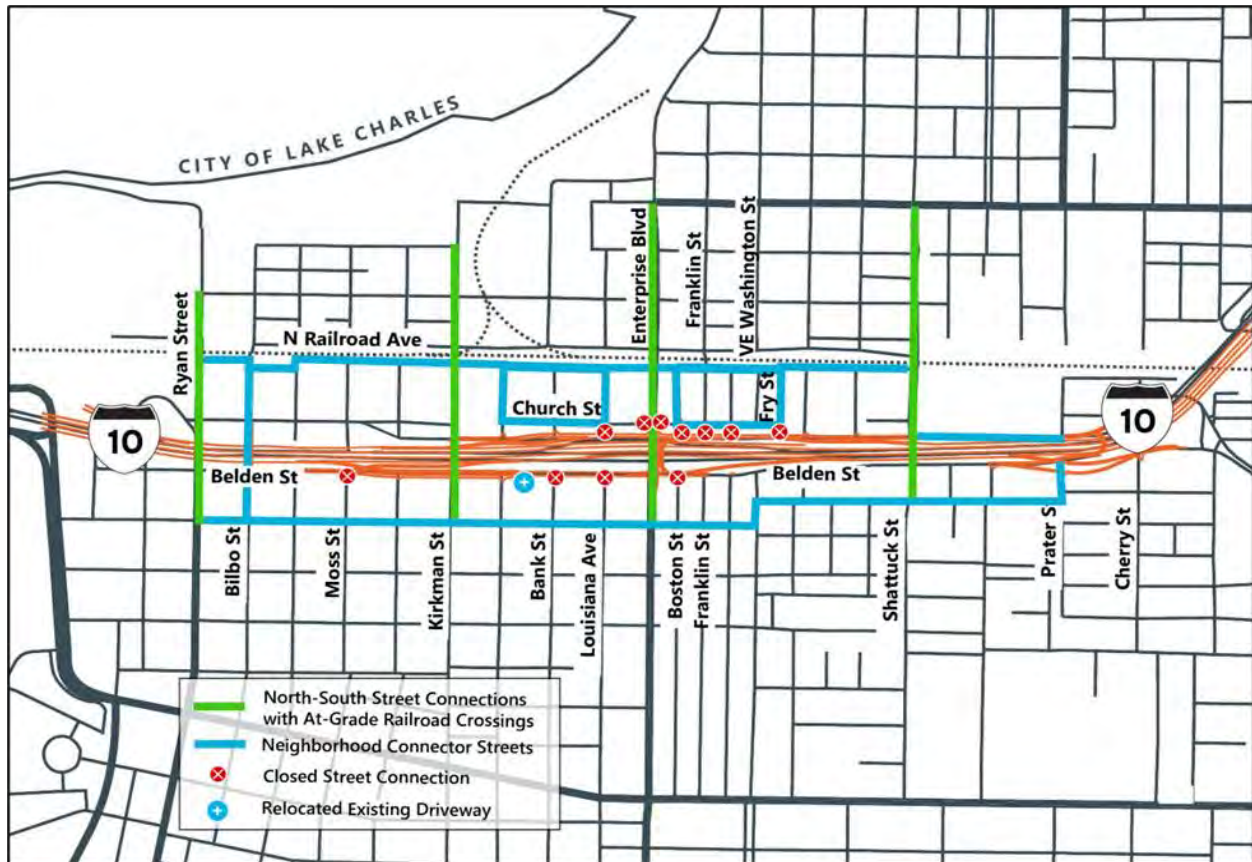


Figure 11: Changes in Local Street Access

Note: All areas shown are identified as EJ communities

A review of the Photolog in **Attachment B** reveals that sidewalks are part of the street network on the south side of I-10, but sidewalks on the north side are scarce. A sidewalk is located along Belden Street with striped crosswalks without pedestrian signals at Kirkman Street and Enterprise Boulevard. East of Enterprise, the sidewalk is missing until the street reaches the cemetery at 1st Avenue. Sidewalks are also visible on major north-south thoroughfares, but conditions such as open driveways, missing connections, and broken pavement limit the utility for people with mobility challenges. Even without a complete sidewalk system, the close grid of the street network (illustrated on **Figure 11**) includes several minor streets that experience relatively low traffic volumes, providing a low-stress network of streets for use by all modes of transportation. Closure of some of the streets to through traffic at the service roads will increase the utility of the network for bicyclists and pedestrians.

As shown on **Figure 8**, two at-grade railroad crossings in the Westlake EJ neighborhood would be closed, limiting north-south travel across Pilley Street at Magnolia Street and at Hilma Street. Pilley Street on the north side of the railroad tracks would remain open for east-west travel. Photos of these crossings are provided in **Attachment C**. As a review of the photos reveals, no sidewalks are found in the target residential neighborhood, but the network consists primarily of local streets that people riding bikes, walking, and using mobility devices can use safely. The railroad tracks and some pavement conditions represent barriers to physical connectivity.

Tolling the crossings of the Calcasieu River would not change access to I-10 or modify important local routes. The Sulphur Avenue extension bridge for Alternative 3A and Alternative 3E would be tolled but access to adjacent properties would not change.

Two properties in the area surrounding Enterprise Boulevard were identified where lack of access to the service roads would make business activities impossible. This issue qualifies the impact as a displacement, and the ROW acquisition and relocation policies codified in the State Constitution and adopted by LADOTD would compensate all losses (see **Sections 2.4.2 and 2.4.3**); therefore, these displacements are not considered DHAE.

After compensation, the net effect of displacement is considered neutral or, in some cases, an improvement and is therefore not considered a DHAE. The project team proposes to reach out to members of the EJ Community directly impacted by property acquisition to solicit their input and consider their needs regarding impacts and mitigation to confirm this determination.

2.4.6. Traffic Noise

Most of the impacted receptors identified by the traffic noise analysis are located in the East End Section between Ryan Street and US 171, where the identified EJ communities are located. See Attachment 3 of the Traffic Noise Technical Report, provided as Appendix K of the DEIS and available online at i10lakecharres.com/documentlibrary, for locations of impacted receptors along the extent of the nine-mile project corridor. These receptors are already impacted by noise and would continue to be impacted in the future year of 2042. Noise abatement measures to mitigate noise impacts in these neighborhoods were determined to be reasonable and feasible in three areas in the East End Improvements south of I-10 as shown on **Figure 12**. Several EJ communities will benefit from these measures to abate traffic noise. There are more receptors located along I-10 in the EJ Communities compared to the non-EJ/reference Communities; therefore, this impact is considered a DHAE.

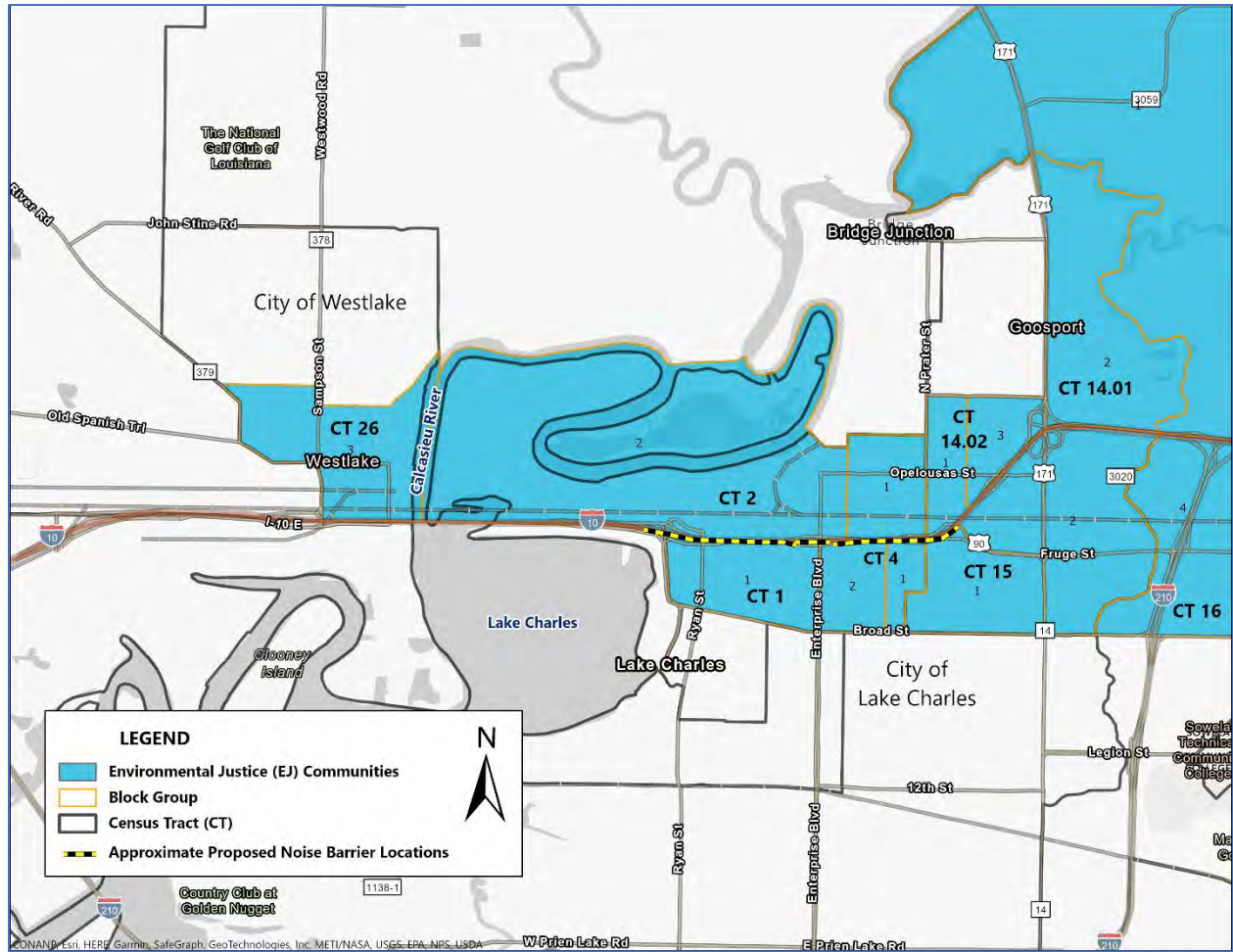


Figure 12: Traffic Noise Barriers

More detailed information about the noise abatement measures in the EJ communities is provided in **Section 2.6.4**.

One criterion for reasonableness of a traffic noise barrier per the LADOTD Traffic Noise Policy is cost effectiveness. The policy states the cost estimate of the noise abatement measure (including but not limited to the costs of real estate acquisition, construction servitude or utility relocation) should be equal to or less than \$47,000 per benefited receptor. LADOTD proposes to double that amount to \$94,000 as an EJ mitigation measure for the DHAE from traffic noise. This change would allow three (3) additional noise barriers to be deemed reasonable based on the Barrier Analysis (Attachment 3 of the Noise Technical Report, Appendix K of the DEIS, provided online at i10lakecharles.com/documentlibrary) previously conducted for the Project. The location of each of these barriers is shown on Figure 15a, Figure 15b, and Figure 15c in Section 2.6.4. This increase in the reasonableness criterion threshold is project-specific EJ mitigation for DHAEs and does not constitute any change in the LADOTD Traffic Noise Policy revised in 2021.

The project team proposes to reach out to members of the EJ Community directly impacted by traffic noise to solicit their input and consider their needs regarding impact and mitigation.

2.4.7. Other Effects

Alternative 3A and Alternative 3E would have adverse impacts on people living adjacent to Sulphur Avenue, which is an EJ community, because of the proposed extension across the Calcasieu River. These build alternatives would increase traffic volumes and related effects including noise, air emissions, and safety. Changes in land use could benefit property owners, but any renters on the corridor might be forced out of the area by induced increases in property values.

Air Quality

Tolling would divert some drivers to I-210, decreasing traffic volumes on I-10 and reducing congestion. Less congestion equates to fewer vehicle emissions and better air quality in the EJ communities adjacent to I-10. However, this would shift congestion to other low-income TAZs along I-210 in Lake Charles. The TAZs along I-210 on the west bank of the Calcasieu River are not EJ; therefore, air quality improvements from the proposed Project would be slightly better overall for EJ communities.

Water Pollution

The EJ neighborhoods identified in the analysis are adjacent to the interstate and its frontage roads. Effects on water quality from the existing roadways is limited to nonpoint stormwater runoff. The proposed Project will incorporate drainage features that should manage stormwater from the new facility in accordance with best practices. A Stormwater Pollution Prevention Plan (SWPPP) will be prepared that will outline the specific Best Management Practices (BMPs) to mitigate stormwater runoff impact to water quality during construction.

Floodplain Management

The proposed Project will cause longitudinal encroachments on Zone A and Zone AE floodplains. In compliance with 23 CFR §650.115(a), NFIP maps were used to determine whether the proposed Project would include an encroachment. Longitudinal encroachment, that is, actions in the base floodplain, includes encroachment from some portions of the existing I-10 alignment and would include similar longitudinal encroachment from all Project alternatives.

Location hydraulic studies were conducted for the Project in accordance with 23 CFR §650.111 commensurate with the significance of the risk of the encroachment and for actions that would support base floodplain development. A significant encroachment is defined in 23 CFR §650.105(1) as a highway encroachment and any direct support of likely base flood-plain development that would involve one or more of the following construction-or flood-related impacts:

- 1) A significant potential for interruption of I-10, which is needed for emergency vehicles and provides an evacuation route for the community.
- 2) A significant risk.
- 3) A significant adverse impact on natural and beneficial flood-plain values.

The location hydraulic studies determined that the proposed Project would not involve any one of the above impacts and would not constitute a significant encroachment on the base floodplain.

The regulations also stipulate that location hydraulic studies shall include evaluation and discussion of the practicability of alternatives to any longitudinal encroachments, and the studies shall include evaluation and discussion of the practicability of alternatives to any significant encroachments or any support of incompatible floodplain development (23 CFR §650.111[d]). The proposed Project is a

realignment and widening of I-10 and the I-10 Calcasieu River Bridge to address deficiencies and traffic operations in this section of the interstate. Chapter 2 details the many alternatives that were considered and dismissed. Alternative 5G was identified as preferred because it is the most practicable and least damaging alternative.

Local, state, and federal water resources and floodplain management agencies were consulted to determine if the proposed highway action is consistent with existing watershed and floodplain management programs and to obtain current information on the proposed Project in the affected watersheds.

In August 2021, state and local floodplain managers recommended measures to minimize potential impacts to floodplains during improvements and construction:

- a) Allow for adequate flow of water and assurance that there will be no back up of water;
- b) Avoid creation of flooding where there was no flooding prior to construction;
- c) Clean debris and keep the surrounding area clear to avoid interference with floodplain functions;
- d) Include proper easements for drainage maintenance purposes and means to avoid impeding or diverting natural flows in the project plans.

Since it has been determined that the proposed Project would not constitute a significant encroachment on the base floodplain, no further discussion of incompatible floodplain development is warranted. Copies of floodplain manager correspondence provided in Appendix G.5 of the DEIS.

Hazardous Waste

Hazardous and toxic wastes are not an issue that would be expected to impact the EJ communities. The groundwater plume contaminated by the releases of ethylene dichloride (EDC) near Sampson Street and I-10 could be reach two low-income residences on Kile Street near the spill area, but these residents will be relocated by the proposed Project, which could be considered a benefit.

Groundwater in the vicinity of the EDC releases discussed in Section 3.12 of the DEIS continues to be monitored for the presence of EDC and related contaminants that may pose a risk to human health and the environment. Actions to prevent disturbing groundwater and soils are being planned, including minimizing the foundation footprint within the limits of the EDC plume, and will be incorporated into the contractor's work plan. At a minimum, soil and groundwater sampling will continue in order to monitor the migration of contamination. Air monitoring to detect harmful volatile organic compounds (VOCs) will be conducted when necessary. A Worker Safety and Protection Plan will be developed by the contractor and workers will be trained to comply with the plan and execute emergency responses as needed. Air monitoring during ground disturbing activities will be conducted and the appropriate Personnel Protective Equipment (PPE) will be provided.

Aesthetic Values

The existing EJ communities abut either the interstate or railroad tracks. The physical surroundings do not provide scenic views or aesthetic elements, although mature live oaks, several of which may be within the required ROW, are located on Belden Street (see **Attachment B**). Landscaping, lighting, and other neighborhood amenities discussed during the Context Sensitive Solutions/Design (CSS/D) workshops may be implemented within the Project's ROW to improve the visual aspects of the EJ neighborhoods.

Meetings with the City of Lake Charles, the City of Westlake, the Southwest Louisiana Alliance (a regional chamber of commerce known as SWLA), and public school officials facilitated by the regional MPO have initiated conversations related to local commitments for maintaining these features.

Treatment of trees in the ROW determined to be significant by LADOTD will be treated according to [LADOTD Significant Trees policy](#). This policy states that

a significant tree is a Live Oak, Red Oak, White Oak, Magnolia, or Cypress that is considered aesthetically important, 18" or greater in diameter at breast height (4'-6' above the ground), and have a form that separates it from the surrounding vegetation or is considered historic. A historic tree is a tree that stands at a place where an event of historic significance occurred that had local, regional, or national importance. A tree may also be considered historic if it has taken on a legendary stature to the community; mentioned in literature or documents of historic value; considered unusual due to size, age, or has landmark status. Significant trees must be in good health and not in a declining condition.

Design considerations and construction and maintenance considerations for significant and historic trees outlined in this policy will be followed to the extent practicable and in coordination with local governments, public authorities, the P3 concessionaire, and EJ neighborhood leaders.

Economic Vitality and Employment Effects

Benefits will accrue to EJ communities through LADOTD's comprehensive Disadvantaged Business Enterprises (DBE) program, which has been designed to ensure local workforce development and DBE participation in the final design, construction, and during operation of the facilities proposed for the first phase (I-10/I-210 West End to Ryan Street) of the Project. Established in the P3 contracting documents, Project goals include actions to:

- Increase the involvement of DBE in all aspects of project delivery; and
- Maximize opportunities to facilitate sustainable economic success, job growth, and career development in the project vicinity, particularly in surrounding underserved communities.

P3 proposers will be required to prepare a DBE Outreach and Participation Plan and will be evaluated on their approach for meeting the DBE goal during design, construction, and the 40-50 year operating period and how DBE participation will be monitored and tracked during these same periods. The P3 proposers will also be evaluated on their approach for outreach efforts to inform the community of business opportunities and to recruit DBE firms for the Project.

A Workforce Development Plan will also be required for the P3 proposals that affirms their commitment to maximize opportunities for socially and economically disadvantaged individuals in the Project vicinity, particularly in surrounding underserved communities. The DBE Outreach and Participation Plan and the Workforce Development Plan shall be updated or revised as necessary during final design, construction, and operational period.

These measures to ensure that benefits from the estimated \$1.5 billion design and construction investment accrue to DBE and socially and economically disadvantaged individuals in the Project area are in addition to LADOTD's typical DBE/Workforce Development requirements, which include Davis-

Bacon Wages (Heavy and Highway), on-the-job training, and a Project-specific DBE goal of 10.34 percent. Specific provisions of the typical requirements include:

- LADOTD Required Provisions for Federal-Aid Construction Projects;
- LADOTD Required Contract Provisions for DBE Participation in Federal-Aid Contracts;
- LADOTD Supplemental Specifications for Specific Equal Employment Opportunity Responsibilities;
- LADOTD Supplemental Specifications for Female and Minority Participation in Construction;
- LADOTD Supplemental Specifications for On-the-Job-Training; and
- Wage Determination (Davis-Bacon).

Finally, this Project has been selected for participation in the Department of Labor, Office of Federal Contract Compliance Program's (OFCCP) [Mega Construction Project Program](#) which will provide federal resources and oversight for compliance with EO 11246. Executive Order 11246 is a major safeguard, protecting the rights of workers employed by federal contractors to remain free from discrimination on the basis of race, color, religion, sex, sexual orientation, gender identity, or national origin, and opens the doors of opportunity through its affirmative action provisions.

LADOTD commits to developing a P3 Project-Specific Disadvantaged Business 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 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.

Traffic Operations and Mobility

Geometric improvements including more and wider lanes and shoulders, longer distances for acceleration, deceleration, and weaving, and traffic streams separated by braided ramps, will improve traffic operations and safety performance, a benefit that would be shared by all users of the interstate and service roads.

Temporary Impacts from Construction

Everyone using I-10 in the Project corridor will be impacted by construction activities at some point in the process. Construction-period impacts will be mitigated as is typical in urban areas. For example, Project lighting will have time limits as will any construction activities that cause high noise levels or high levels of vibration. Dust and erosion will be controlled with proven mitigation methods. Efforts will be made throughout the construction period to keep access open to businesses along the corridor and to maintain pedestrian pathways.

Where residential areas are adjacent to the Project construction area, activities generating noise and vibration will be limited to daylight hours. Construction activities resulting in temporary noise increases from the operation of heavy machinery and pile driving will be mitigated to the extent practicable. Measures such as ensuring all construction equipment is properly muffled and all motor panels are shut during operation will be required. LADOTD procedures for documenting adjacent structures before and after pile driving activities will be implemented. Regular construction activities for roadways typically should not cause vibrations that rise to the level of property damage, but a “Vibration Complaint Form” is available to the property owner(s) for such occurrences and can be obtained from LADOTD as necessary.

Installation of noise barriers determined to be reasonable and feasible may be implemented in phases to abate noise as early as possible. In addition to dampening and shielding methods to mitigate severe noise and vibration from pile driving, vibration or hydraulic insertion techniques, and drilled or augured holes for cast-in-place piles, are alternative methods that may produce noise levels significantly lower than traditional pile driving.

The potential impacts of particulates and dust in the air from site preparation and the operation of heavy equipment will be minimized by using fugitive dust control measures, such as covering or treating disturbed areas with dust suppression techniques, sprinkling open ground, and covering loaded trucks. The contractor will ensure that all heavy equipment and off-road engines used in construction comply with CAA emission standards and testing requirements. BMPs to reduce air emissions, suppress dust, and shield residential areas from construction site lighting, if nighttime work is necessary, will be employed.

Traffic on I-10 will be kept open during construction of the Project, although some lanes of traffic may be closed periodically, thus reducing the capacity of the roadway temporarily. Construction of the replacement I-10 Calcasieu River Bridge will be completed before demolition of the old bridge so that the crossing will remain open. Sampson Street will be closed to traffic for a period of approximately 18 months if Alternative 5G is constructed. Signage indicating the best detours for traffic from Westlake to I-10 will be installed during the period of closure.

2.5. Comparison of Impacts and Benefits to EJ and Non-EJ Communities

A formal determination was made of the potential Project effects that could be determined as DHAEs on EJ communities. It is important to assess both the operational effects and the construction effects, as well as both direct and indirect effects. **Table 10** compares the impacts on the EJ communities with non-EJ (reference) communities (Census Tract 5, Block Group 1; Census Tract 27.02, Block Group 2; and Census Tract 32, Block Group 1). Shaded cells indicate impacts that are disproportionately high and adverse to the EJ communities relative to non-EJ/reference communities.

2.6. Mitigation for Impacts on EJ Communities

Project impacts to EJ communities have been avoided to the extent practicable. Mitigation for impacts will be implemented as required by law and in accordance with FHWA and LADOTD policies. Impacts and measures to minimize and mitigate negative effects on EJ communities have been considered and were presented at the public hearing for the Project held in December 2022. See Section 2.7 for details on public outreach to EJ Communities to date. LADOTD will conduct additional public outreach to update affected residents of EJ communities in advance of Project implementation during the design and construction phases.

Table 10: Comparison of Benefits and Impacts to EJ and Non-EJ/Reference Communities

Impact	EJ Communities	Non-EJ/Reference Communities	Mitigation Measure	Impact after mitigation
Traffic Operations and Mobility	Benefited	Benefited	N/A	N/A
Bridge Replacement	Benefited	Benefited	N/A	N/A
Community Cohesion & Connectivity / Accessibility	Impacted by Closed Street Access at the I-10 Service Roads / Benefited by Elimination of Through Traffic in Adjacent Neighborhoods	Not impacted	LADOTD will conduct public outreach to update the affected residents of the EJ communities in advance of implementation of any changes in access and neighborhood circulation during design and construction phases.	Benefited
Right of Way Acquisition	Approximately 58 Acres Impacted (Alternative 5G)	Approximately 10 Acres Impacted (Alternative 5G)	Timely public outreach will be conducted to inform property owners of the LADOTD property acquisition and relocation process. For every expropriation or action to take 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 right-of-way acquisition, LADOTD will offer advanced or early acquisition to property owners.	No Impact
Displacements - Residential	20 (Alternative 5G)	0 (Alternative 5G)	Timely public outreach will be conducted to inform property owners of the LADOTD property acquisition and relocation process. For every expropriation or action to take 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. As mitigation for the DHAEs from displacements, LADOTD will offer advanced or early acquisition to property and business owners. When advanced acquisition is offered to property owners, LADOTD will also offer relocation benefits prior to actual acquisition.	The replacement property will be equal to or better than the current property; all expenses related to relocation will be compensated.
Displacements - Business	16 (Alternative 5G)	1 (Alternative 5G)	Timely public outreach will be conducted to inform property owners of the LADOTD property acquisition and relocation process. For every expropriation or action to take 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	The replacement property will be equal to or better than the current property; all expenses related to relocation will be compensated.

Impact	EJ Communities	Non-EJ/Reference Communities	Mitigation Measure	Impact after mitigation
			to, the appraised value of the property and all costs of relocation, inconvenience, and any other damages actually incurred by the owner. Employees potentially impacted will be offered an opportunity to discuss job services/employment options; reemployment once the business is re-established; and orientation about the Louisiana Workforce Commission, unemployment benefits, as well as services to employers looking for workers. As mitigation for the DHAEs from displacements, LADOTD will offer advanced or early acquisition to property and business owners. When advanced acquisition is offered to property owners, LADOTD will also offer relocation benefits prior to actual acquisition.	
Tolling	Impacted	Impacted	Local Auto-Rate toll that will not exceed the low-income burden value of \$2.88 per one-way trip expressed in 2021 dollars 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.	The toll rate will not increase except for over time due to inflation. A local toll rate could be as low as 25 cents but will be no more than \$2.88 per one-way trip.
Traffic Noise*	80 first-row noise receptors impacted	19 first-row impacted noise receptors	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 ; LADOTD will present this mitigation to members of EJ communities directly impacted by the Project. (Note this is not a change in the Noise Policy; it is additional mitigation to address EJ disproportionately high and adverse effects from the project.)	Reduction in Traffic Noise for 50 first-row noise receptors and 223 non-first row benefiting noise receptors for a combined total of 273 benefiting noise receptors
Air Quality	Not impacted	Not impacted	N/A	N/A
Water Pollution	Not impacted	Not impacted	N/A	N/A
Hazardous Waste	Not impacted	Not impacted	N/A	N/A
Significant Trees	Impacted	Not Impacted	LADOTD will conduct public outreach to update the affected residents of the EJ communities in advance of impacts to significant trees. This public outreach will include information on CSS/D and input from the public to ensure that these elements are incorporated in the final design where reasonable and feasible.	Impacted trees will be replaced with CSS/D elements determined by the EJ residents affected by Phase 2 of the project.

Impact	EJ Communities	Non-EJ/Reference Communities	Mitigation Measure	Impact after mitigation
Major Infrastructure Investment / Employment Effects	Benefited	Benefited	N/A	N/A
Temporary Impacts during Construction	Traffic Delays / Lane Closures	Traffic Delays / Lane Closures	A Traffic Management Plan (TMP) will be developed to ensure that at least one lane of traffic in each direction on I-10 will be maintained at all times; signage will be provided for street closures that cause detours; LADOTD will conduct public outreach to update the affected residents of the EJ communities in advance of implementation of any traffic delays, detours, and lane closures.	The public and affected EJ communities will have time to prepare for temporary delays, detours, and lane closures, which will be minimized to the extent practicable.
	Air and Noise Impacts	Air and Noise Impacts	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. LADOTD will conduct public outreach to update the affected residents of the EJ communities in advance of construction activities impacting air and noise levels.	The public and affected EJ communities will have time to prepare for air and noise and air impacts that will be minimized to the extent practicable.
	Construction Effects at Night	Construction Effects at Night	Best management practices to shield residential areas from construction site lighting, if nighttime work is necessary, will be employed; LADOTD will conduct public outreach to update the affected residents of the EJ communities in advance of construction activities.	The public and affected EJ communities will have time to prepare for night lighting effects that will be minimized to the extent practicable.

*First row impacted receptors is shown to demonstrate noise impact for comparison purposes.

Note: Shaded cells indicate impacts that are disproportionately high and adverse to EJ communities relative to non-EJ/reference communities before mitigation.

2.6.1. Right-of-Way Acquisition and Displacements

The legal process for displacement impacts is provided in federal law through the URA. 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 URA. 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 take 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 this program can be found [online](#).

The State of Louisiana offers a homestead exemption from tax for the first \$75,000 of primary residence value. Also, a Senior Citizens Special Assessment Level Homestead Exemption "freeze" is available to homeowners 65 years of age or older who meet an income requirement as set forth by the Louisiana legislature. These measures mitigate any tax burden on EJ homeowners.

In addition, the LADOTD [Acquisition of Right of Way and Relocation Assistance](#) brochure establishes the relocation resources available to all displaced residential, business, farms, and nonprofits without discrimination. This program ensures that all appropriate measures will be implemented to mitigate potentially DHAE on identified EJ communities, including relocation advisory services and residential assistance ensuring that at least one comparable decent, safe, and sanitary (DSS) replacement dwelling is made available. LADOTD must provide comparable replacement housing that is DSS and within the financial means of the displaced person before that person is required to move.

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 to you 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.
- 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 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 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.

If the change in real estate taxes were to qualify as a "hardship" to EJ residents, Section 1 (p. 11) of the brochure, which also addresses the issue of counseling, stipulates that relocation services are provided by qualified personnel who will conduct one-on-one interviews with each resident being displaced to offer assistance and "provide counseling or help get assistance from other sources as a means of minimizing hardships." For business, farm, and nonprofit organizations, the brochure stipulates that "The agency representative will help determine the need for outside specialists to plan, move, and reinstall personal property. The agency representative will identify and resolve any issues regarding what is real estate and what is personal property to be relocated. The agency representative will explore and provide advice as to possible sources of funding and assistance from other local, State, and Federal agencies."

The Louisiana Employment Security Law stipulates that unemployment insurance (UI) is available to individuals who earn wages from an employer who is required by law to pay the unemployment insurance tax. It does not include self-employment. Any employer that employed an employee in the past eighteen (18) months is notified to provide an explanation of why the employee is no longer working for them, which, in the case of a business interruption due to relocation or suspension of business activities, would qualify the employee to make a claim for these benefits because the employee is no longer working or has had work hours reduced. The employee must file a weekly claim to receive benefits, must be available for full-time work and must actively look for work by contacting at least three different employers about job openings. If the layoff from the regular employer is temporary with a definite return date for this employer (within a six-week period), the employee will have satisfied the work search requirement if available for re-employment.

The Louisiana Workforce Commission (LWC) has implemented an online tool to assist the unemployed in gathering information on the total possible number of weeks they may collect UI benefits. The Helping

Individuals Reach Employment (HIRE) tool is the LWC's enhanced self-service system that integrates the unemployment claims system with the Louisiana Virtual One-Stop system to file claims, search for work, and compile and document compliance with the work search requirement. Free legal aid to eligible low-income persons in Louisiana is available to Calcasieu Parish residents through Acadiana Legal Services Corporation (www.la-law.org; 337-237-4320 or 800-256-1175).

As shown in **Table 10**, the acres of acquired ROW needed for the Project is higher in EJ communities than in Non-EJ/reference communities. The ROW to be acquired in the EJ communities consists of residential, commercial, industrial, and institutional land uses. Approximately 55 percent is commercial property. The majority of acquired commercial acreage consists of the commercial properties along Interstate 10 (I-10) on North Lakeshore Drive in Lake Charles. Fifteen (15) percent is residential. Twenty-nine (29) percent is industrial, and one percent is institutional. Approximately 24 percent of the total acquired ROW consists of empty lots. Of these empty lots, 79 percent are industrial; 5 percent are residential; and one percent is commercial.

2.6.2. Tolling

Tolling would impact all users of the I-10 bridge by increasing the direct cost of each trip. However, 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. A local toll rate could be as low as 25 cents but will be no more than \$2.88 in 2021 dollars per one-way trip. To qualify for the rate, the resident's vehicle must be registered in a local jurisdiction. The discount will be applied to trips loaded on a transponder available for purchase online and at an outlet in the project corridor where people shop. At a minimum, two (2) outlets will be provided: one in a low-income community in Westlake, and one in a low-income community adjacent to I-10 in Lake Charles.

2.6.3. Accessibility

Access to a connected transportation network for people of all ages and abilities will be addressed through proposed implementation of bicycle and pedestrian facilities. Concepts developed for the EJ communities are provided in Appendices C.5 and C.6 of the DEIS. These will be refined and evaluated for implementation in accordance with the LADOTD [Complete Streets Policy](#) and ADA requirements. The LADOTD Complete Streets Policy states that

Provisions for all users will be integrated into the project development process for the entirety of all projects through design features, using CSS/D on a) all new and reconstruction roadway projects that serve adjacent areas with existing or reasonably foreseeable future development or transit service, DOTD should plan, fund, and design sidewalks and other pedestrian facilities. The appropriate facility type will be determined by the context of the roadway with local government involvement, and b) on all new and reconstruction roadway projects, DOTD should provide bicycle accommodations appropriate to the context of the roadway. The provision of a paved shoulder of sufficient width, bicycle lane, a shared use path, or a marked shared lane may also suffice, depending on context with local government involvement.

All projects shall consider the impact that improvements will have on safety for all users and make all reasonable attempts to mitigate negative impacts on non-motorized modes. Restricting non-motorized access should not be considered as an appropriate strategy with the exception of those limited access facilities where pedestrians and

bicyclists are prohibited. DOTD will strive to ensure projects do not become barriers to pedestrians, bicyclists, and transit users by providing appropriate safe crossings, providing corridor continuity, and ensuring transportation projects comply with the current accessibility guidelines.

2.6.4. 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. Attachment 4 contains the noise barrier analysis. Three (3) noise barriers proved to be reasonable and feasible for mitigation of traffic noise based on traffic noise modeling conducted for the extent of the project corridor and according to LADOTD's Highway Traffic Noise Policy (revised in October 2021). These three noise barriers are located along portions of I-10 adjacent to the EJ Communities (See **Figures 13-15**). No other barriers proved to be reasonable. Only one barrier located in a Non-EJ Community was analyzed. Results show it was not reasonable. See figure titled "CNE A – All Alternatives." Feasible and reasonable noise barriers were presented to members of the EJ Communities along the project corridor at the public hearing for the Project in December 2022.

LADOTD proposes to double the reasonableness criterion threshold amount to \$94,000 as an EJ mitigation measure for the DHAE from traffic noise. This change would allow three (3) additional noise barriers to be deemed reasonable and feasible based on the Barrier Analysis ([Attachment 3 of the Noise Technical Report, Appendix K of the DEIS, provided online at i10lakecharles.com/documentlibrary](#)) previously conducted for the Project. The locations of each of these barriers are shown on **Figure 15a**, **Figure 15b**, and **Figure 15c**. This increase in the reasonableness criterion threshold is project-specific mitigation for EJ DHAE and does not constitute any change in the LADOTD Traffic Noise Policy revised in 2021.

The locations of these additional barriers (See **Figures 15a-15c**) along with the locations of the three feasible and reasonable noise barriers (See **Figures 13-15**) will be presented as mitigation during public outreach to affected parties. The project team proposes to reach out to members of the EJ Community directly impacted by traffic noise to solicit their input and consider their needs regarding impact and mitigation.

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

Photos of the area affected can be viewed in **Attachment B**.

Figure 13 illustrates the portions of noise barrier located between Veterans Memorial Boulevard and Enterprise Boulevard on the south side of I-10. As shown, the noise barrier model predicts that this abatement measure would mitigate noise for 100 percent of the front-row receptors and provide a noise reduction benefit for 90 receptors in the area. Barriers would be located on-structure for the interstate for most of the extent. The first barrier would continue along the eastbound off-ramp descending from I-10 to ground level at Belden Street.

Mounted barriers would not only mitigate for noise but would also shield properties within view of the interstate from night traffic lights. At ground level, the noise wall would obstruct views of the interstate from Belden Street. Targeted public outreach will continually update residents about traffic noise impacts and proposed abatement measures.

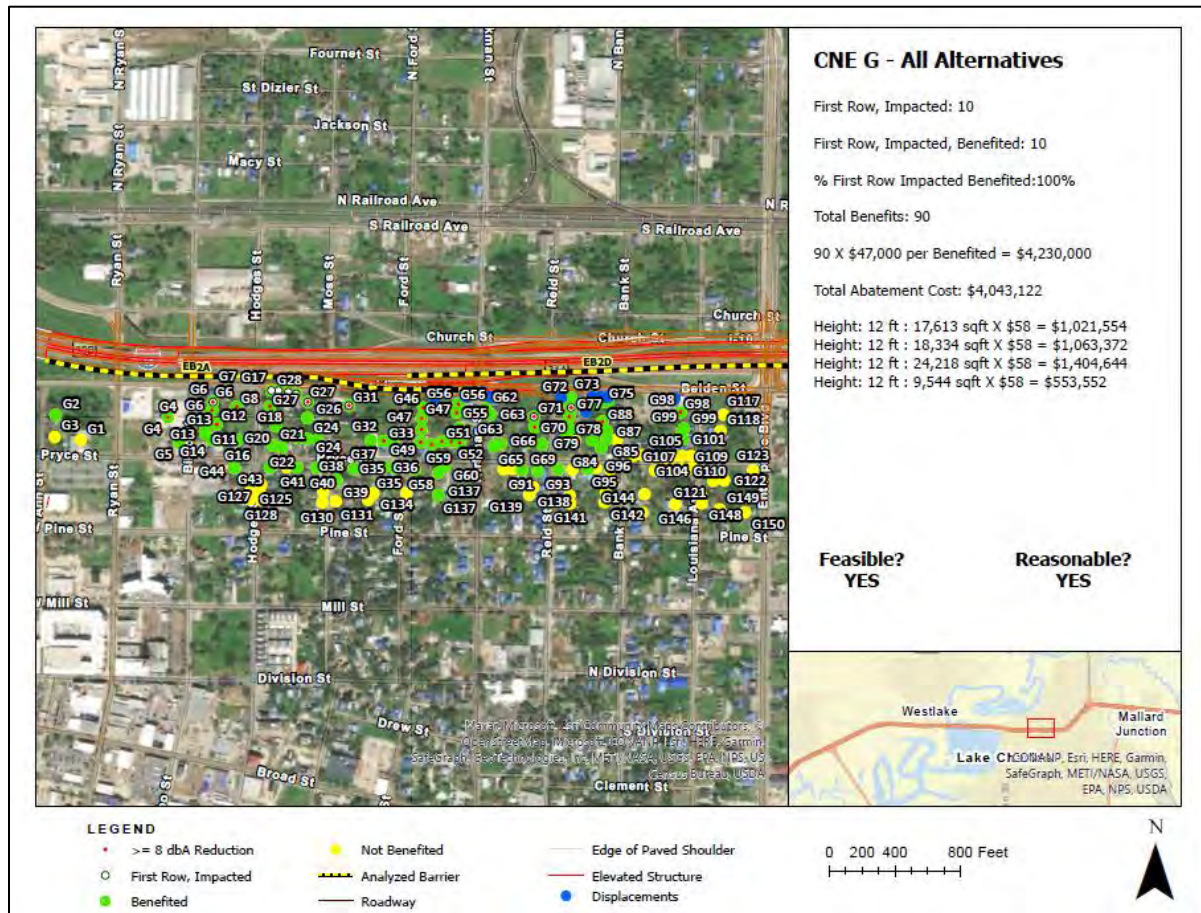


Figure 13: Noise Barrier Modeled in CT 1, BG 1, identified as an EJ Community

Figure 14 illustrates portions of noise barriers in Census Tract 4, Block Group 2, east of Enterprise Boulevard on the south side of I-10, which is identified as an EJ community. As shown, the noise barrier model predicts that this abatement measure would mitigate noise for 100 percent of the front-row receptors and provide a noise reduction benefit for 88 receptors in the area. The barriers would be located on the structure of the interstate for most of the extent. The second barrier would ascend from Belden Street to I-10 along the eastbound on-ramp near VE Washington Street.

The mounted barriers would not only mitigate for noise but would also shield properties within view of the interstate from night traffic lights. At ground level, the noise wall would obstruct views of the interstate from Belden Street. Targeted public outreach will continually update residents about traffic noise impacts and proposed abatement measures.

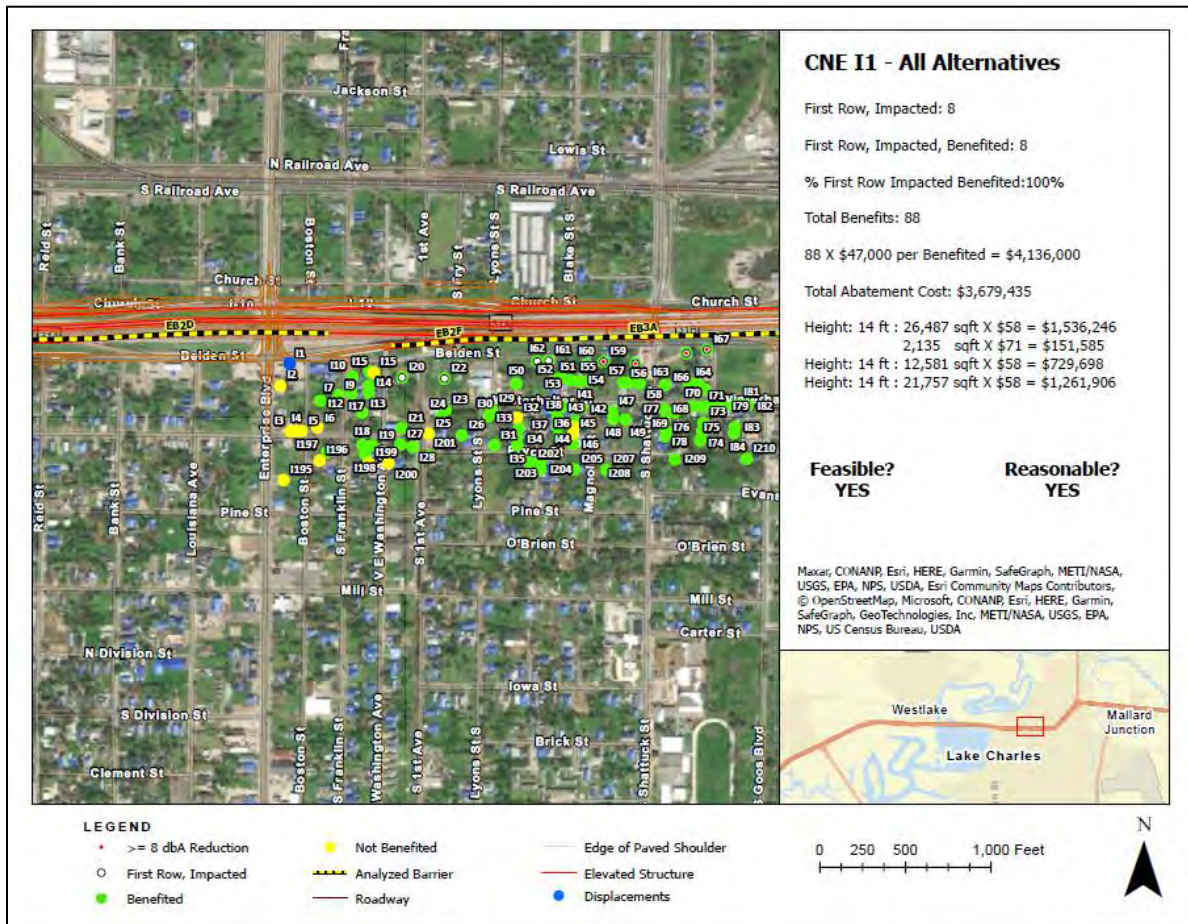


Figure 14: Noise Barrier Modeled in CT 4, BG 2, identified as an EJ Community

Figure 15 illustrates a portion of a noise barrier in the identified EJ Census Tract 4, Block Group 1 and Census Tract 15, Block Group 1, on the south side of I-10. As shown, the noise barrier model predicts that this abatement measure would mitigate noise for 83 percent of the front-row receptors and provide a noise reduction benefit for 78 receptors in the area. The barrier mapped would be mounted on the elevated interstate structure and would not only mitigate for noise but would also shield properties within view of the interstate from night traffic lights.

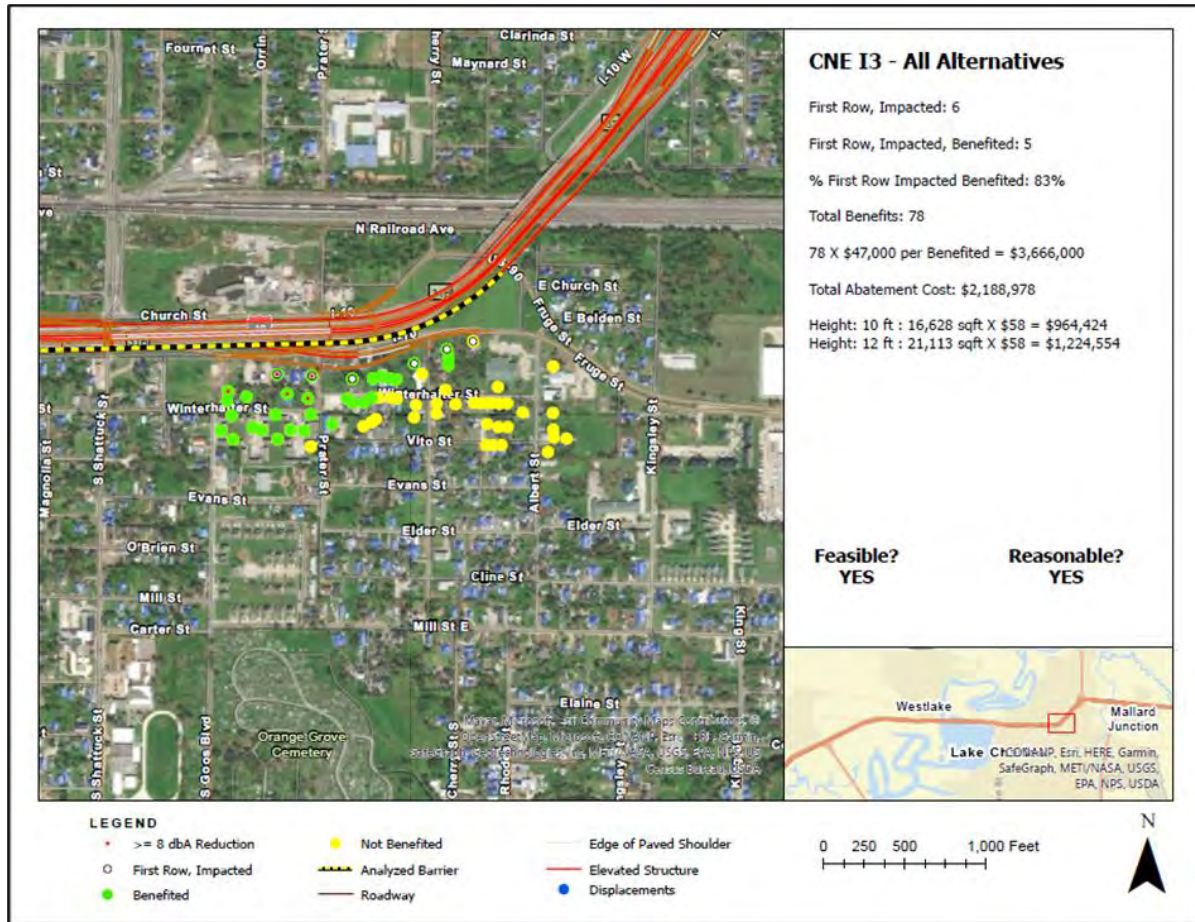


Figure 15: Noise Barrier Modeled in CT 4, BG 2, and CT 15, BG 1, identified as EJ

Figure 15a illustrates CNE J, where noise barriers were analyzed. As shown in the figure, based on the noise policy reasonableness criterion of \$47,000 per benefited receptor, this noise barrier was not considered reasonable. CNE J is located in Census Tract 2, Block Group 2, and Census Tract 2, Block Group 1, east of Enterprise Boulevard on the north side of I-10 and is identified as an EJ community. Therefore, LADOTD proposes to double the threshold amount to \$94,000 per benefited receptor, which would make this barrier feasible and reasonable. This increase in the reasonableness criterion threshold is project-specific EJ mitigation for DHAEs and does not constitute any change in the LADOTD Traffic Noise Policy revised in 2021.

As shown, the noise barrier model predicts that this abatement measure would mitigate noise for 100 percent of the front-row receptors and provide a noise reduction benefit for 23 receptors in this area. The barriers would be located on the structure of the interstate and interstate ramp.

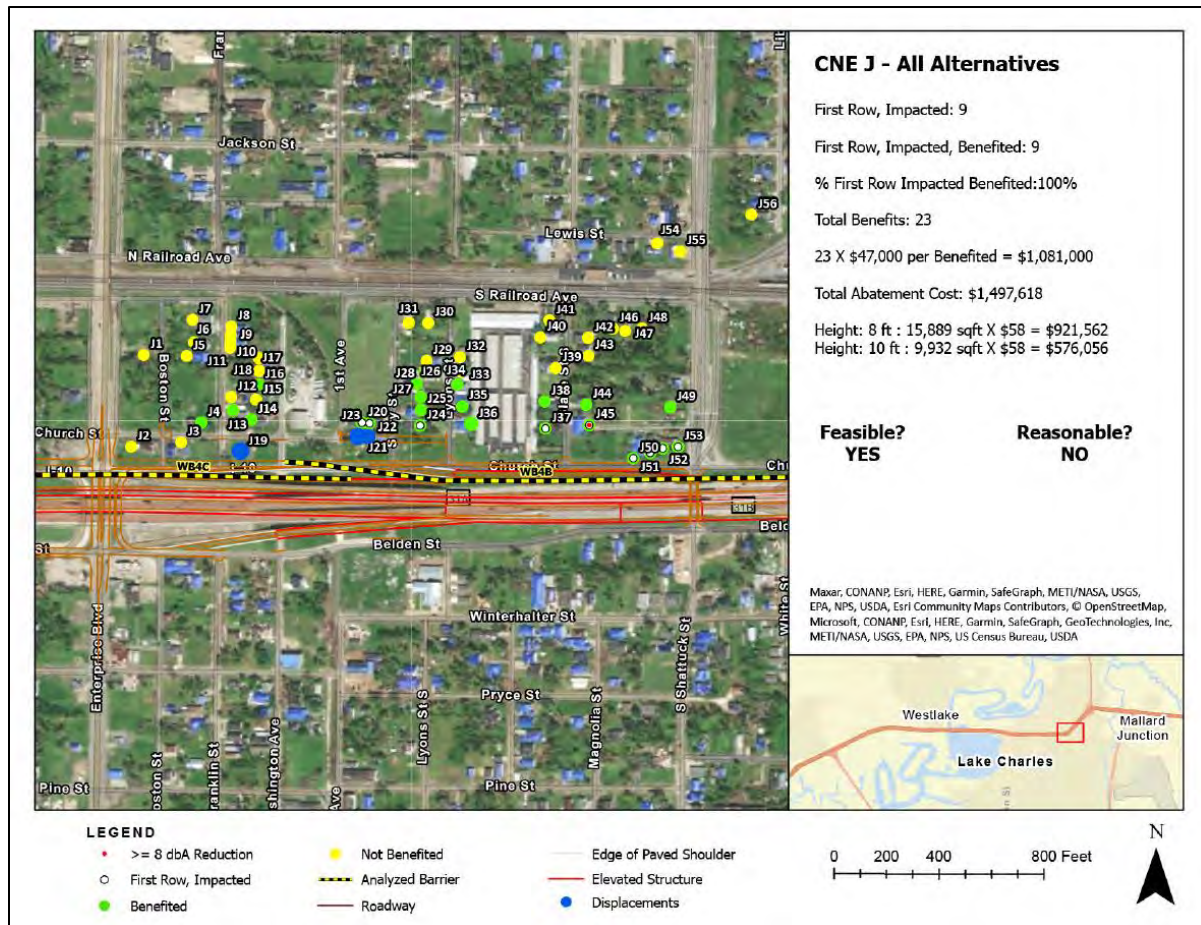


Figure 15a: Noise Barrier Modeled in CT 2, BG 2, and CT 2, BG 1, identified as EJ Community

Figure 15b illustrates CNE K, where noise barriers were analyzed. As shown in the figure, based on the noise policy reasonableness criterion of \$47,000 per benefited receptor, this noise barrier was not considered reasonable. CNE K is located in Census Tract 14.02, Block Group 1, and Census Tract 14.02, Block Group 3, east of Enterprise Boulevard on the north side of I-10, between North Cherry Street and the Opelousas Street exit, which is identified as an EJ Community. Therefore, LADOTD proposes to double the threshold amount to \$94,000 per benefited receptor, which would make this barrier feasible and reasonable. This increase in the reasonableness criterion threshold is project-specific EJ mitigation for DHAEs and does not constitute any change in the LADOTD Traffic Noise Policy revised in 2021.

As shown, the noise barrier model predicts that this abatement measure would mitigate noise for 100 percent of the front-row receptors and provide a noise reduction benefit for 24 receptors in this area. The barriers would be located on the structure of the interstate and interstate ramp.

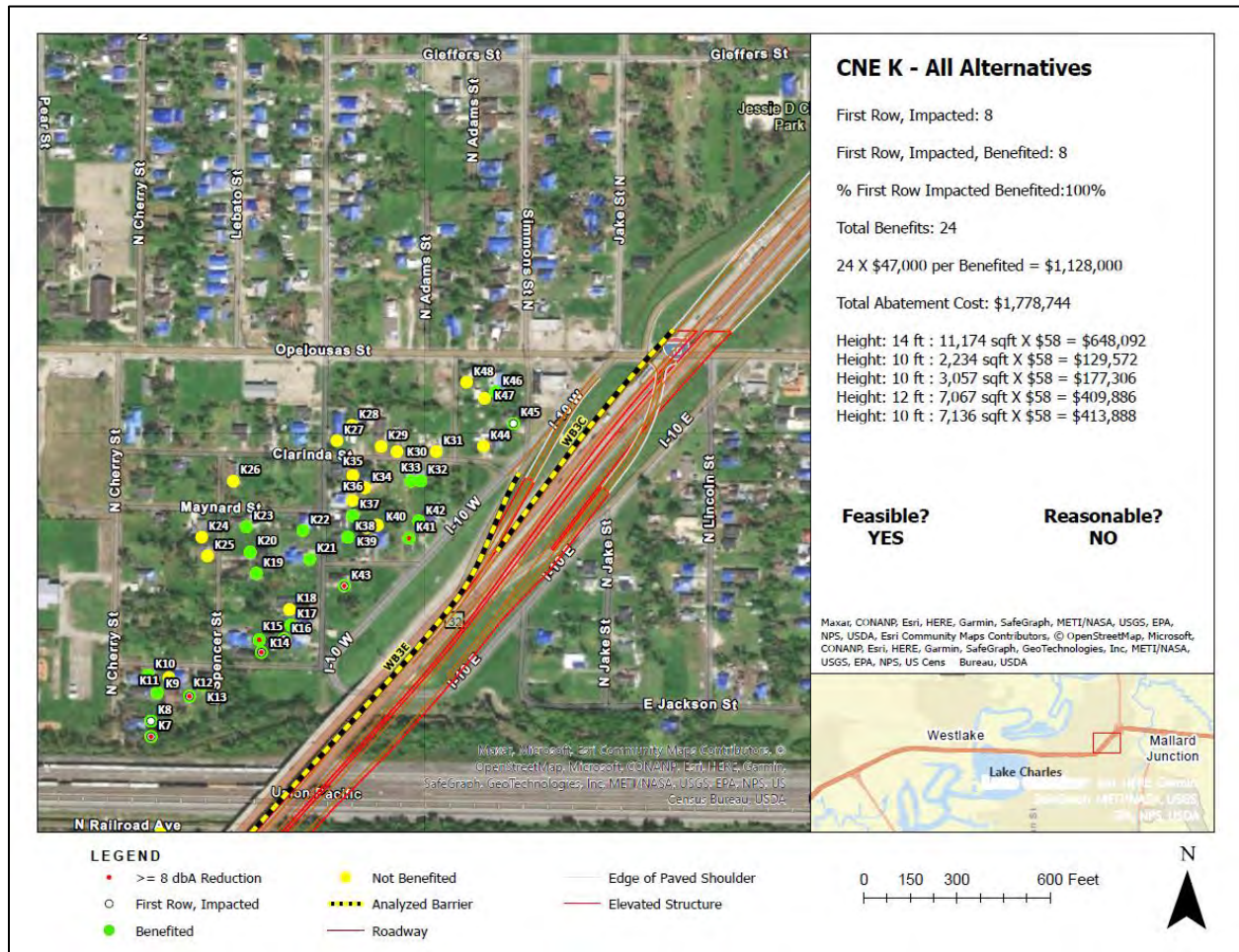


Figure 15b: Noise Barrier Modeled in CT 14.02, BG 1, and CT 14.02, BG 3, identified as EJ

Figure 15c illustrates CNE O, where noise barriers were analyzed. As shown in the figure, based on the noise policy reasonableness criterion of \$47,000 per benefited receptor, this noise barrier was not considered reasonable. CNE O is located in Census Tract 14.01, Block Group 2, east of Martin Luther King Hwy (US 171) on the north side of I-10, which is identified as an EJ Community. Therefore, LADOTD proposes to double the threshold amount to \$94,000 per benefited receptor, which would make this barrier feasible and reasonable. This increase in the reasonableness criterion threshold is project-specific EJ mitigation for DHAEs and does not constitute any change in the LADOTD Traffic Noise Policy revised in 2021.

As shown, the noise barrier model predicts that this abatement measure would mitigate noise for 100 percent of the front-row receptors and provide a noise reduction benefit for 10 receptors in this area. The barriers would be located on the structure of the interstate and interstate ramp.

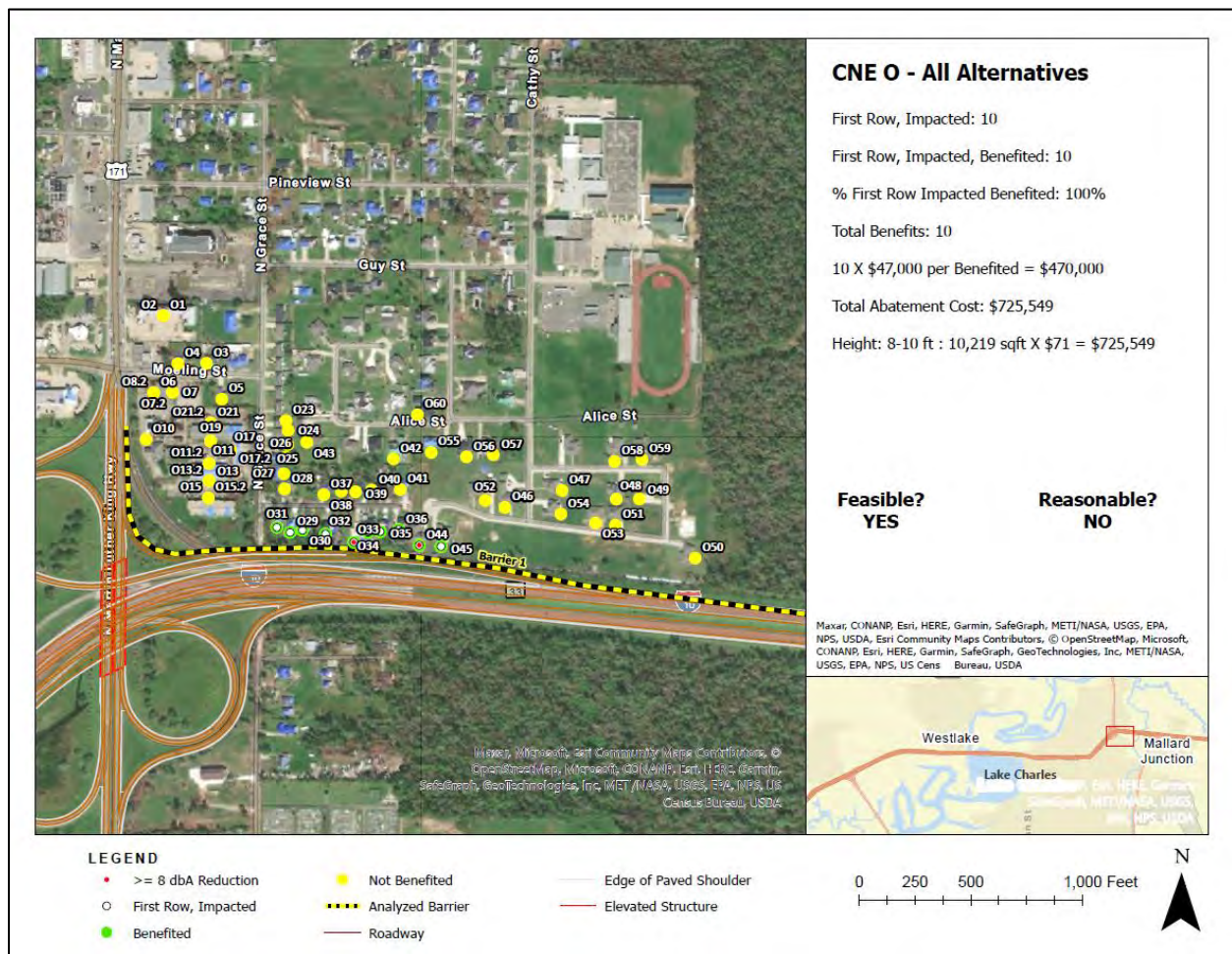


Figure 15c: Noise Barrier Modeled in CT 14.01, BG 2, identified as EJ

2.6.5. Aesthetics and Amenities

Although the aesthetics of the neighborhoods directly affected by the proposed Project are already impacted by proximity to transportation facilities such as the interstate, service roads, and railroad tracks, the proposed Project may implement landscaping, lighting, and other neighborhood amenities. Although the community did not ask for improvements, residents were receptive to the proposed amenities discussed during the two CSS/D workshops and meetings held at locations within the Project

ROW to improve visual aspects of the EJ neighborhoods. One of the core principles for CSS/D is that design outcomes meet or exceed the expectations of both designers and stakeholders. This approach emphasizes continued communication and collaboration with community members to achieve consensus on how best to enhance community environments.

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 will be incorporated into the Project where appropriate in accordance and compliance with Louisiana's Complete Streets Policy and ADA requirements. 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 addition, bicycle/pedestrian set-aside fund has been created for facilities that would not be directly funded through the Project. This set-aside funding would not apply to facilities on the I-10 Calcasieu River Bridge because current Louisiana state laws do not allow bicycle and pedestrian facilities on interstate highways, but the P3 request for proposals (RFP) will include directions to propose projects addressing bicycle and pedestrian facilities on the bridge and will coordinate with IMCAL/MPO regarding design and construction of these facilities.

Treatment of trees in the ROW determined to be significant by LADOTD, such as the live oaks in the EJ community on Belden Street, will be treated in accordance with the LADOTD Significant Trees Policy detailed in Section 2.4.7.5 above.

For the first phase of the project, the EJ community will be offered participation in the Active Transportation Set-Aside funding process with the MPO.

LADOTD will conduct targeted public outreach to the EJ Community, providing updates and an opportunity to give input regarding the changes in Aesthetics and Amenities during design and construction of Phase 2 of the Project to ensure that CSS/D Elements are incorporated where reasonable and feasible.

2.7. Outreach to EJ Communities

The I-10 Calcasieu River Bridge Improvements Project has been ongoing for many years. The public has been engaged through four (4) public meetings in various locations throughout the Project area, two (2) virtual public meetings, several stakeholder meetings, and a public hearing. LADOTD has met several times with local officials including the mayors and city councils of Lake Charles and Westlake, the MPO, and SWLA, which formed its own coalition to support construction of the Project (<https://buildourbridge.org/>).

The Project website (<https://www.i10lakecharles.com>) makes project documentation and progress information available to the public.

Over the course of the EIS process, two (2) in-person public meetings were held at the Convention Center in Lake Charles and one (1) at the Recreation Center in Westlake. The fourth round of public meetings was held virtually due to the COVID-19 pandemic. Mayors from Westlake and Lake Charles attended the briefing for public officials before the meeting. Two (2) members of the Calcasieu Parish Police Jury attended the briefing for public officials before meeting: the Parish Administrator, and Mr. Tony Guillory, the police juror from District 4, which touches the edge of two EJ neighborhoods in Census Tract 4, Block Group 1 and Census Tract 15, Block Group 1. One (1) member of the Lake Charles

City Council attended the briefing: Mr. Stuart Weatherford, Council President and member from District E, which is outside the Project corridor south of I-210 and west of Ryan Street.

During the CSS/D workshops, every effort was made to engage the EJ communities of Westlake and Lake Charles. Flyers were distributed to the residents and businesses of the neighborhood between Pilley Street and Railroad Avenue in Westlake. Representatives of the African-American Chamber and the Lake Charles Police Department attended both workshops in 2020 and 2021. The councilpersons for Lake Charles City Council District A and District B, which include the Census Tract Block Groups identified as EJ, did not attend any of these meetings. In August 2021, Mr. Marshall Simien, a long-time resident of North Lake Charles, was appointed interim Councilperson for District A. He was contacted in late 2021 to assist in outreach for these neighborhoods.

The opportunity to directly engage the identified and affected EJ Communities is critical to making sure that environmental justice is adequately accounted for as part of the proposed Project. The Pryce/Miller Recreation Center, located in the heart of an EJ Community on Belden Street that would be affected by the Project, was selected as the venue for the Open House Public Hearing held in December 2022. At a site visit to this facility in November 2022, members of the public hearing organizing team met with and received contact information from community members who were subsequently supplied with flyers for handout throughout the neighborhoods abutting the Recreation Center. Public notices were published in local newspapers and on the Recreation Center Facebook page. Radio and local television stations further promoted the public hearing.

The video presentation at the public hearing included information on the identified Project impacts: traffic operations and mobility, tolling, traffic noise, air quality, hazardous waste, and ROW acquisition and relocations. Meeting attendees were given a handout listing the Project impacts by alternative. The public hearing also contained a station dedicated to roll plots of each alternative where properties impacted by street closures and relocations could be viewed (see **Section 2.6**).

The Relocation Assistance Brochure was made available during the NEPA process online and at in-person meetings. Hard copies of the brochure were offered at a table manned by LADOTD Real Estate representatives during public meetings in 2017, 2019, and at the public hearing. In addition, portions of the relocation policy were read aloud at the end of the public hearing rolling presentation, which was also posted on the Project website and announced as part of the virtual public hearing. Comments from public hearing attendees were recorded. These comments and LADOTD responses to comments are included as part of the Final Environmental Impact Statement (FEIS) for the Project which will be made available to the public for comment prior to being approved.

Table 11 displays EJ-related comments received throughout the four (4) public meetings and the public hearing. Continued outreach to members of environmental justice (EJ) communities who are affected by the Project is currently being conducted to solicit direct feedback on project impacts, specifically those deemed as having DHAЕ on the EJ community. A summary of the materials presented, and the feedback obtained through this additional outreach, will be included as part of the Record of Decision (ROD).

3. Conclusion

Based on the above discussion and analysis using the methodology outlined in federal guidance in accordance with the provisions of Executive Order 12898, U.S. Department of Transportation Environmental Justice Order 5610.2(c), and FHWA Order 6640.23A, along with the data and public input

collected to date, it has been determined that the I-10 Calcasieu River Bridge Improvements Project will potentially cause DHAEs on EJ communities.

The Project team has made numerous efforts to avoid and minimize impacts. While some areas may experience adverse effects, these areas will also greatly benefit from the increased mobility and improved traffic operations resulting from the project, economic benefits from large-scale infrastructure investments, an increase in construction jobs during construction, and longer-term jobs for operation and maintenance of the interstate, bridge, and tolling facilities.

Each alternative (**Alternative 3A**, **Alternative 3E**, and **Alternative 5G**) was analyzed for impacts throughout this memorandum. Subsequently, five questions, enumerated below based on FHWA guidance, were addressed and analyzed to help evaluate impacts to determine whether there are further practicable mitigation measures that can be taken or if practicable alternatives have been identified that would avoid or reduce DHAEs.

Question 1: Would the project result in disproportionately high and adverse impacts that would be predominately borne by a minority or low-income population?

Yes. Most of the Census Block Groups in the project corridor are minority and/or low-income and were identified as EJ communities. Only three Census Block Groups, one in the City of Lake Charles, one spanning the City of Westlake and the unincorporated area west of the city, and one entirely in the unincorporated area at the western end of the project corridor, were identified as non-EJ. These communities were used as the reference community for comparison with the EJ communities (see **Table 10** in **Section 2.5**).

Businesses and households in EJ communities will likely experience disproportionate displacements related to acquisition of Project ROW. It is expected that twenty (20) EJ residences and fifteen (15) EJ businesses will be displaced compared to zero (0) reference community residences and two (2) reference community businesses. EJ communities will also be disproportionately and adversely impacted by traffic noise compared to the Census Block Groups aggregated as the reference community. The traffic noise model prepared for the Project predicted that 80 first-row noise receptors would be impacted in the EJ communities compared to 19 first-row noise receptors in the reference community. Another direct impact on the EJ communities that would not affect the reference community is the potential removal of several large, mature live oaks within the ROW.

Question 2: Does the project affect a resource that is especially important to a minority or low-income population?

Yes. As shown in **Table 11**, financial resources were especially important to EJ communities throughout Calcasieu Parish, particularly in terms of how they would be negatively impacted by tolling. Commenters at Project-related public meetings and public hearings repeatedly expressed concerns over the economic impact that tolling would have on business livelihoods. One commenter from an EJ community in North Lake Charles noted that “the toll will kill North Lake Charles” because “the majority of traffic will divert and take 210 and not 1-10. And that is the traffic that we rely on in North Lake Charles to exit for Opelousas Street and Highway 171 to do business. Well, that traffic will not be diverted and will hurt out business in North Lake Charles.” Another commenter observed, “If we toll this bridge starting [at] \$2, that’s in 2021. What happens in 2025, 2030 when the price of a toll goes up to 4, 5, 6, 8 dollars? If I’m a person driving from Houston coming this way and I know that I have to pay \$5, I’m going to divert and take 210 and go around the bridge.”

Commenters also mentioned the personal burden that tolling would exact, stating “I don’t feel that we need a toll because of the people that’s, you know, going to Westlake and making under \$20,000 a year, \$22,000 a year. Plus things that I feel that — you know, that we can do something else with.” Another commenter who emailed a concern acknowledged that “I know we need a new bridge” but added “For those of us who are single parents and those on limited resources, a toll would be a hardship having to work in Lake Charles every day. It would be taking food from my family. Things are hard enough already without that cost or worry. I have been a part of this community for all my life. Why am I being penalized now?”

Finally, a commenter who spoke at the public hearing held in December 2022 declared

This is a really bad idea that affects poorer families and businesses that have work or relatives on the other side of the bridge. All this will do is force people to spend more money they do not have whether paying a toll or burning more gas going an alternate route. I personally have a low income family that has relatives in Sulphur. If this toll is implemented, it will affect how often I can visit the, considering I live in a part of Lake Charles where the fastest and most fuel efficient route is the I-10 bridge. I have lived here all my life and pay my taxes. I do not feel it is right to toll the residents of Calcasieu Parish to cross a bridge they have been crossing for free since it was built, especially when we HAVE the money to fund the bridge. I just ask to please consider the people and the effects it will have on them.

Question 3: Would the project result in disproportionately high and adverse impacts on a minority or low-income population that would be appreciably more severe or greater in magnitude than the impact that would be suffered by the non-minority or non-low-income population?

Yes. As shown on **Table 10** above, there are five (5) DHAE impacts on EJ communities related to the Project that are appreciably more severe or greater in magnitude than those in the non-EJ communities. First, residential displacements are disproportionately high in EJ communities relative to non-EJ communities. Second, the number of business displacements in EJ communities is disproportionately high compared with those in non-EJ communities. Third, the number of acres of ROW needing to be acquired for the Project is disproportionately higher in EJ communities compared to non-EJ communities. Fourth, first-row impacted noise receptors are far greater in EJ communities than in non-EJ communities. And fifth, several significant trees (live oaks) located in an EJ community are in the ROW and will need to be removed.

Question 4: Does the project propose mitigation?

Yes. Measures to minimize and mitigate negative effects on EJ communities have been considered and will be implemented as required by law and in accordance with FHWA and LADOTD policies. As well, the Project has been developed using a CSS/D approach. This approach has been used and will continue to be used to solicit community concerns throughout the entirety of the Project process through targeted ongoing community outreach and communication. As comments have been received, they have been documented and incorporated into the Project plans and design.

All residential and business displacements will be provided with replacement housing and/or relocation assistance. Regarding displacements, generous and just compensation is mandated by both Federal and Louisiana laws. Residential relocation benefit packages typically include replacement housing for owners

and renters, moving costs, and assistance in locating replacement housing. Commercial relocation benefits typically include moving costs, site search expenses, and business reestablishment expenses. Relocation packages are determined on an individual basis based on ownership or tenant status.

Traffic-related noise impacts would be mitigated with noise barrier walls included as part of the Project. Three (3) noise barriers proved to be reasonable and feasible for mitigation of traffic noise based on traffic noise modeling conducted for the extent of the project corridor and according to LADOTD's Highway Traffic Noise Policy (revised in October 2021). These three noise barriers are located along portions of I-10 adjacent to the EJ Communities (See **Figures 13-15**). LADOTD proposes to double the reasonableness criterion threshold amount to \$94,000 as an EJ mitigation measure for the DHAE from traffic noise. This change would allow three (3) additional noise barriers to be deemed reasonable and feasible based on the Barrier Analysis (Attachment 3 of the Noise Technical Report, Appendix K of the DEIS, provided online at 10lakecharles.com/documentlibrary) previously conducted for the Project. The locations of each of these barriers are shown on **Figure 15a**, **Figure 15b**, and **Figure 15c**. This increase in the reasonableness criterion threshold is project-specific mitigation for EJ DHAE and does not constitute any change in the LADOTD Traffic Noise Policy revised in 2021.

Table 33 in Chapter 4 of the DEIS provides location and barrier height of these three proposed barrier walls. **Figures 13-15** in this Technical Report depicts approximate locations of these barrier walls.

Mitigation for construction-related impacts is summarized in Section **2.4.7.7** of this Technical Report and is described in full in **Section 4.2.10** in Chapter 4 of the DEIS. Other measures for the avoidance, minimization, and mitigation of impacts to the EJ population can be found in **Section 3.3.2** in Chapter 3 of the DEIS.

Question 5: Are there project benefits that would accrue to EJ populations?

Yes. While the described permanent, direct impacts are unavoidable, they are also offset by Project benefits that will more than offset any adverse effects. These benefits include generous and just compensation for residential and business displacements beyond what is mandated by federal laws, the implementation of noise barriers, protection of significant trees, and the installation of potential enhancements such as lighting, landscaping, bicycle/pedestrian facilities and other amenities that were considered during the CSS/D process in accordance with the Complete Streets Policy. These concepts, common to all three build alternatives, could improve neighborhood values and cohesiveness (see **Section 2.6**).

EJ populations would also benefit from significant Project-related economic development resulting from an investment of approximately \$1.5 billion in the first phase. Access to well-paying construction jobs for all skill levels would benefit workers across communities and income levels. These jobs will be created directly by the Project, and thousands more full- and part-time jobs will be created indirectly or induced by the Project. Additionally, it is expected that some of the properties in the Project corridor will increase in value. New development and investment in the corridor is expected to improve with construction of this Project. For property owners along the corridor, this can provide substantial increases in wealth. For renters, this effect may cause additional, economic hardship, although all appropriate measures mentioned above will be implemented to offset potentially disproportionate adverse effects on these tenants.

In addition, reduced congestion and improved air quality will benefit everyone in the Project corridor, particularly residents in EJ communities because of the proximity of their homes to the interstate. Traffic

benefits would be shared by all users of the interstate and service roads equally.

Noise abatement measures include construction of noise barriers that would benefit impacted receptors in EJ communities. These barriers are typically solid wall-like structures located between the noise source and impacted receptors. Noise walls at three (3) locations on or near the EJ community near Enterprise Boulevard will aid in reducing noise levels.

3.1. Title VI Considerations

Title VI of the Civil Rights Act of 1964 (Title VI) states that “no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.” Executive Order (EO) 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, states that each federal agency “shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations” (Office of the President 1994). Minority persons include citizens or lawful permanent residents of the United States who are African-American, Hispanic or Latino, Asian-American, American Indian, or Native Alaskan.

3.1.1. Involvement of Impacted Communities in Decision-Making Process

Throughout the course of the Project process, targeted outreach to EJ communities was conducted to ensure that minority and low-income populations were engaged in the process. **Figure 16** illustrates where people who provided a physical address on public meeting sign-in sheets live or receive US mail. As shown, attendance from people with addresses within the EJ communities is representative and includes participants who live near areas that will be directly impacted by the proposed Project.

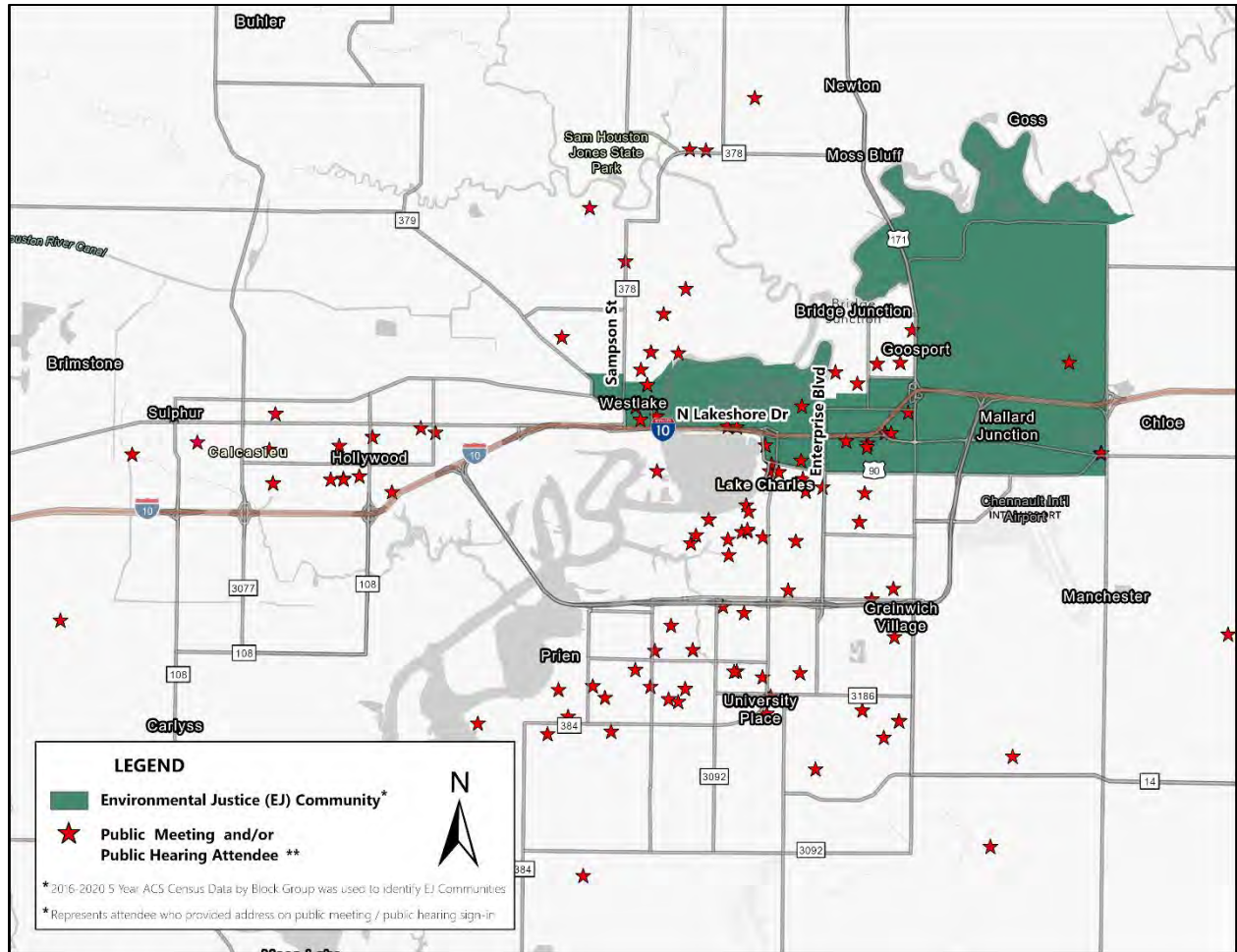


Figure 16: Addresses of People in EJ Communities Who Attended Public Involvement Events

Comments compiled from all the public involvement events including the website, the Project email, and Project phone number were searched for issues related to EJ communities. **Table 11** lists these comments with responses provided in public meeting summaries.

Table 11: EJ-Related Comments Received and Responses

Date	Commenter Identified as Member of EJ Community?	Comment	Response
8/11/17	Yes (residence noted as being located in an EJ Community)	<p>1. Please explain how far the bridge will be from my home on Church Street. Is the bridge going in a circle from right to left still passing next my property?</p> <p>2. Will I be offered to sell and move or stay? 3. It appears it is coming to I-10 east toward Railroad Avenue and Hersey street. Explanation needed. 4. Request more police in the area to deal with panhandlers.</p>	<p>1. The westbound approach of the Calcasieu River Bridge would be over 1.5 miles from the specified residence. Unclear about the “bridge going in a circle from right to left.” Assuming commenter is referencing the I-10 overpass going over the railroad. The project proposes the replacement of the I-10 railroad overpass, but the new overpass would remain in the same location as the existing overpass.</p> <p>2. Regarding ROW acquisition: Efforts would be made to avoid, minimize, or mitigate potential environmental impacts associated with the proposed alternative(s) to ROW and structures. Real property would be acquired in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act which provides important protections and assistance for people affected by Federally funded projects. It ensures that people whose real property is acquired, or who move as a result of projects receiving Federal funds, will be treated fairly and equitably and will receive assistance in moving from the property they occupy. Regarding if ROW will be required for the project: It is anticipated that the proposed project would require ROW at various locations along the project corridor. ROW needs differ amongst the PBAs and Sub-Alternatives. Minimize ROW impacts is one of the 11 project objectives used to screen the PBAs. Potential ROW impacts associated with each PBA and their associated Sub-Alts. can be found in the Objectives Screening Matrix presented in Attachment C. Once the Reasonable Alternatives are identified, the design schematics will be advanced and potential ROW impacts refined as part of the EIS. It is at that time that specific ROW impacts will be determined. Regarding the residence on Church St.: It is not anticipated that ROW would be needed from the property on Church St. given its distance from the I-10 corridor and that the improvements to I-10 in that area are proposed to remain along the same corridor as existing I-10.</p> <p>3. Assuming commenter is referencing I-10 as it moves east toward Railroad Ave. and Hersey St. Improvements to I-10 in the area near Railroad Ave. and Hersey St. will remain in the same general footprint as existing I-10.</p> <p>4. Comment noted</p>

Date	Commenter Identified as Member of EJ Community?	Comment	Response
8/2/17	Yes (Representative from "A Community Voice")	<p>1. A Community Voice (ACV) is in favor of the bridge replacement project. 2. Need sufficient and adequate alternate routes with traffic controls during bridge down time, especially during hurricane season to ensure safety of all commuters. 3. Due to the EDC contamination, safety precautions must be put in place with safe work practices employed and adequately trained workers. Constant monitoring practices must be established. 4. Support implementation of Lead Safe Work Practices for the removal and disposal of the existing bridge, as most bridges build around the time of the Calcasieu River Bridge contain lead based paint. 5. Support using Disadvantaged Business Enterprise contractors and local residents for jobs, as the majority of large scale construction projects across the state employ out of state contractors that fail to return investment into the communities in which they work.</p>	<p>1. Comment noted and incorporated into alternatives screening analysis. 2. Travel on I-10 would be maintained during the project's construction. This includes maintaining traffic on I-10 while the new Calcasieu River Bridge is constructed and while I-10 between the I-210 interchanges is under construction. 3. The EDC contamination in relation to the proposed project will be evaluated in the EIS based on available information and to the extent practicable in coordination with Louisiana Department of Environmental Quality (LDEQ). Assessment and remediation of the EDC spill is the responsibility of the entity responsible for its release, Phillips66. LDEQ is working with Phillips66 on the monitoring and remediation of the EDC contamination. Well monitoring findings are available to the public through the LDEQ Electronic Document Management System (EDMS). If a proposed alternative with the potential to encounter EDC is selected as the Preferred Alternative, LADOTD would follow the proper procedures to ensure the safety of its employees, contractors, and the public. 4. Lead safe work practices would be utilized if lead is encountered at any stage of the proposed project. Regarding the Olin remediated landfill, the proposed preliminary alignment for PBA 4 could potentially impact the remediated landfill. However, as the proposed alignment is preliminary, LADOTD would work to avoid or minimize impacts to the remediated landfill, as practicable. Should the proposed alignment be selected as the Preferred Alternative and impact the remediated landfill, LADOTD would follow the appropriate procedures to mitigate and Page 13 monitor the impacts as regulated by the EPA. 5. Comment noted. Use of DBE firms and/or local contractors would be per the LADOTD policy in effect at the time of contract advertisement.</p>

Date	Commenter Identified as Member of EJ Community?	Comment	Response
3/25/21	Unknown	If all the lanes are tolled then no one will go through them and most will by pass... If there is a wreck on 210 and you have to bypass to the 110 will toll be lifted? you can not force tollways to people due to hardship conditions.	It is the intention of LADOTD to keep the toll rates as low as possible so that using the I-10 bridge does not impose a financial burden on any household in the area.
12/29/22	Unknown (Email)	I know we need a new bridge but for those of us who are single parents and those on limited resources a toll would be a hardship having to work in Lake Charles everyday. It would be taking food from my family. Things are hard enough already without that cost or worry. Have been part of this community for all my life why be penalized now.	Measures to address the impacts of tolling on low-income persons include the establishment of a local auto-rate toll that will not exceed \$2.88 per trip expressed in 2021 dollars. A more comprehensive explanation is included in the Draft EIS, specifically pages 3-15 to 3-20. Tolls rates will escalate over time with inflation.

Date	Commenter Identified as Member of EJ Community?	Comment	Response
12/14/22	Unknown	<p>This is a really bad idea that affects poorer families and businesses that have work or relatives on the other side of the bridge. All this will do is force people to spend more money they do not have (wether (sic) paying a toll or burning more gas going an alternate route). I personally have a low income family that has relatives in sulphur. If this toll is implemented it will affect how often I can visit them considering I live in a part of lake Charles where the fastest and most fuel efficient route is I-10 bridge. I have lived here all my life and pay my taxes I do not feel it is right to toll the residents of calcasieu parish to cross a bridge they have been crossing for free since it was built especially when we HAVE the money to fund the bridge. I just ask to please consider the people and the affects it will have on them.</p>	<p>To date, \$800 million have been designated for the I-10 Calcasieu Bridge project. The sources of that amount are divided between state allocations of \$575 million, and direct federal funding of \$225 million. \$150 million of the federal funds were recently awarded through the Infrastructure Investment and Jobs Act (aka the Bipartisan Infrastructure Law) Mega Grant Program. The first phase of the Calcasieu River Bridge Improvements Project (I-10/1-210 West End to Ryan Street) is estimated to cost \$1.5 billion leaving a funding gap of \$700 million. That gap will be filled with private investment funds through a Private-Public Partnership (P3), which will complete the design, construct the project, and operate the facility over a 50-year period. The tolls collected will cover the P3 costs and pay the partners a return on their investment. An additional \$140 million has been committed from the State General Fund and the Highway Priority Program for right of way and other pre-construction costs. Without tolls, this project would not be financially feasible. LADOTD has been authorized by the legislature to move forward with a P3 for the first phase. The state will be responsible for the balance of the project from Ryan Street to I-10/I-210 East End. C: Measures to address the impacts of tolling on low-income persons include the establishment of a local auto-rate toll that will not exceed \$2.88 per trip expressed in 2021 dollars. A more comprehensive explanation is included in the Draft EIS, specifically pages 3-15 to 3-20. Toll rates will escalate over time with inflation. F: Funding Commitments and Sources for Construction of the I-10 Calcasieu River Bridge Improvements Project are listed below. • \$ 85 million – State General Obligation Bonds - \$10 million in Priority 1 + \$75 million in Priority 5 • \$ 30 million – Coronavirus Response and Relief Supplement Act (CRRSA) – federal legislation enacted in December 2020 • \$ 50 million – Louisiana Rescue Plan Fund (e.g., 2021 American Rescue Plan) – 2021 Appropriation through Act 485 • \$100 million – Louisiana Rescue Plan Fund (e.g., 2021 American Rescue Plan) – 2022 Appropriation through Act 117 • \$100 million – State General Fund – 2022 Appropriation through Act 167 • \$150 million – Infrastructure Investment and Jobs Act (IIJA) – 2022 discretionary grant award (\$600 million requested) • \$240 million – First six years of Vehicle Sales Tax – dedication through Act 486 (2021)/Act 505 (2022) • \$ 45 million – Transportation Trust Fund (Federal) – allocation from Highway Priority Program \$800 million – Total funding commitments for construction</p>

Date	Commenter Identified as Member of EJ Community?	Comment	Response
12/13/22	Unknown	<p>My name is Jason Daniels. And I just wanted to say I agree with all the complainers that I don't feel that we need the toll because of the people that's, you know, going to Westlake and making under \$20,000 a year, \$22,000 a year. Plus things that I feel that – you know, that we can do something else with. But I'm just in agreement with everybody else as far as that and stuff like that.</p>	<p>To date, \$800 million have been designated for the I-10 Calcasieu Bridge project. The sources of that amount are divided between state allocations of \$575 million, and direct federal funding of \$225 million. \$150 million of the federal funds were recently awarded through the Infrastructure Investment and Jobs Act (aka the Bipartisan Infrastructure Law) Mega Grant Program. The first phase of the Calcasieu River Bridge Improvements Project (I-10/I-210 West End to Ryan Street) is estimated to cost \$1.5 billion leaving a funding gap of \$700 million. That gap will be filled with private investment funds through a Private-Public Partnership (P3), which will complete the design, construct the project, and operate the facility over a 50-year period. The tolls collected will cover the P3 costs and pay the partners a return on their investment. An additional \$140 million has been committed from the State General Fund and the Highway Priority Program for right of way and other pre-construction costs. Without tolls, this project would not be financially feasible. LADOTD has been authorized by the legislature to move forward with a P3 for the first phase. The state will be responsible for the balance of the project from Ryan Street to I-10/I-210 East End. C: Measures to address the impacts of tolling on low-income persons include the establishment of a local auto-rate toll that will not exceed \$2.88 per trip expressed in 2021 dollars. A more comprehensive explanation is included in the Draft EIS, specifically pages 3-15 to 3-20. Toll rates will escalate over time with inflation.</p>

Date	Commenter Identified as Member of EJ Community?	Comment	Response
12/13/22	Unknown	<p>So my comment is on the toll. We are not happy with the toll because the toll will – we feel that [it] will kill North Lake Charles. Because once the toll goes from \$2, it’s going to go to 3 to 4 to 5 to 6 to 7 to \$10. So if it’s \$5, if I was driving I would take 210 not to pay \$5. So once that goes into effect, I feel that the majority of traffic will divert and take 210 and not I-10. And that is the traffic that we rely on in North Lake Charles to exit for Opelousas Street and Highway 171 to do business. Well, that traffic will not be diverted and will hurt our business in North Lake Charles.</p>	<p>To date, \$800 million have been designated for the I-10 Calcasieu Bridge project. The sources of that amount are divided between state allocations of \$575 million, and direct federal funding of \$225 million. \$150 million of the federal funds were recently awarded through the Infrastructure Investment and Jobs Act (aka the Bipartisan Infrastructure Law) Mega Grant Program. The first phase of the Calcasieu River Bridge Improvements Project (I-10/I-210 West End to Ryan Street) is estimated to cost \$1.5 billion leaving a funding gap of \$700 million. That gap will be filled with private investment funds through a Private-Public Partnership (P3), which will complete the design, construct the project, and operate the facility over a 50-year period. The tolls collected will cover the P3 costs and pay the partners a return on their investment. An additional \$140 million has been committed from the State General Fund and the Highway Priority Program for right of way and other pre-construction costs. Without tolls, this project would not be financially feasible. LADOTD has been authorized by the legislature to move forward with a P3 for the first phase. The state will be responsible for the balance of the project from Ryan Street to I-10/I-210 East End. Measures to address the impacts of tolling on low-income persons include the establishment of a local auto-rate toll that will not exceed \$2.88 per trip expressed in 2021 dollars. A more comprehensive explanation is included in the Draft EIS, specifically pages 3-15 to 3-20. Toll rates will escalate over time with inflation. Most of the traffic diverting would use I-210 to avoid the toll. These results are based on Alternative 5G and are preliminary and subject to change. The Public-Private Partnership will determine the toll rates and timing of tolls to minimize diversions from I-10 and maximize the revenue from tolls. A preliminary tolling traffic and revenue analysis provided in Appendix F of the Draft EIS determined that variable rate tolling, with lower rates in non-peak times, would cause a 26% diversion in 2032 and a 24% diversion in 2042. It is anticipated, however, that some diverting traffic will eventually return to the tolled route because of convenience and overall timesaving.</p>

Date	Commenter Identified as Member of EJ Community?	Comment	Response
12/13/22	Unknown	<p>My name is Fitzgerald Darbone. I'm the president of the African-American Chamber of Commerce here in Lake Charles. My statement is also about the toll. If we toll this bridge starting \$2, that's in 2021. What happens in 2025, 2030 when the price of a toll goes up to 4, 5, 6, \$8? If I'm a person driving from Houston coming this way and I know that I have to pay \$5, I'm going to divert and take 210 and go around the bridge.</p>	<p>To date, \$800 million have been designated for the I-10 Calcasieu Bridge project. The sources of that amount are divided between state allocations of \$575 million, and direct federal funding of \$225 million. \$150 million of the federal funds were recently awarded through the Infrastructure Investment and Jobs Act (aka the Bipartisan Infrastructure Law) Mega Grant Program. The first phase of the Calcasieu River Bridge Improvements Project (I-10/I-210 West End to Ryan Street) is estimated to cost \$1.5 billion leaving a funding gap of \$700 million. That gap will be filled with private investment funds through a Private-Public Partnership (P3), which will complete the design, construct the project, and operate the facility over a 50-year period. The tolls collected will cover the P3 costs and pay the partners a return on their investment. An additional \$140 million has been committed from the State General Fund and the Highway Priority Program for right of way and other pre-construction costs. Without tolls, this project would not be financially feasible. LADOTD has been authorized by the legislature to move forward with a P3 for the first phase. The state will be responsible for the balance of the project from Ryan Street to I-10/I-210 East End. Measures to address the impacts of tolling on low-income persons include the establishment of a local auto-rate toll that will not exceed \$2.88 per trip expressed in 2021 dollars. A more comprehensive explanation is included in the Draft EIS, specifically pages 3-15 to 3-20. Toll rates will escalate over time with inflation. Most of the traffic diverting would use I-210 to avoid the toll. These results are based on Alternative 5G and are preliminary and subject to change. The Public-Private Partnership will determine the toll rates and timing of tolls to minimize diversions from I-10 and maximize the revenue from tolls. A preliminary tolling traffic and revenue analysis provided in Appendix F of the Draft EIS determined that variable rate tolling, with lower rates in non-peak times, would cause a 26% diversion in 2032 and a 24% diversion in 2042. It is anticipated, however, that some diverting traffic will eventually return to the tolled route because of convenience and overall timesaving.</p>

Date	Commenter Identified as Member of EJ Community?	Comment	Response
12/13/22	Unknown	<p>So I would like to voice concern about the toll on the bridge. My name is Jayvon Muhammad. And the toll and the private ownership is a challenge for me. I'm originally from San Francisco, recently moved here. And when I was a child the toll was 75 cents to cross the Bay Bridge. It's \$6 now. The Golden Gate Bridge is more. Most people cross two bridges, meaning that we pay \$10 or more to go to work. So I'm really concerned for the people here that are going to cross this bridge and the toll is going to continue to rise. I think we can't even determine how much because private people own it.</p>	<p>To date, \$800 million have been designated for the I-10 Calcasieu Bridge project. The sources of that amount are divided between state allocations of \$575 million, and direct federal funding of \$225 million. \$150 million of the federal funds were recently awarded through the Infrastructure Investment and Jobs Act (aka the Bipartisan Infrastructure Law) Mega Grant Program. The first phase of the Calcasieu River Bridge Improvements Project (I-10/I-210 West End to Ryan Street) is estimated to cost \$1.5 billion leaving a funding gap of \$700 million. That gap will be filled with private investment funds through a Private-Public Partnership (P3), which will complete the design, construct the project, and operate the facility over a 50-year period. The tolls collected will cover the P3 costs and pay the partners a return on their investment. An additional \$140 million has been committed from the State General Fund and the Highway Priority Program for right of way and other pre-construction costs. Without tolls, this project would not be financially feasible. LADOTD has been authorized by the legislature to move forward with a P3 for the first phase. The state will be responsible for the balance of the project from Ryan Street to I-10/I-210 East End. Measures to address the impacts of tolling on low-income persons include the establishment of a local auto-rate toll that will not exceed \$2.88 per trip expressed in 2021 dollars. A more comprehensive explanation is included in the Draft EIS, specifically pages 3-15 to 3-20. Toll rates will escalate over time with inflation.</p>

Date	Commenter Identified as Member of EJ Community?	Comment	Response
12/13/22	Unknown	<p>Hi. I commented over there, but I would like to comment again. My name is Jayvon Muhammad. I just want to acknowledge that the toll – my concern with the toll is that it'll not stay at \$2.88. I'm from San Francisco. When I was a child the toll was 75 cents. Today it is \$6. Most people cross two bridges and pay 10 to \$11. So I'm really concerned about the increases that will happen. Also, it's of the character a little bit to have a toll on both sides of the bridge. In other areas – in some other areas you pay going one way but you don't pay going the other way. So if toll has to happen, I think that should be a consideration.</p>	<p>To date, \$800 million have been designated for the I-10 Calcasieu Bridge project. The sources of that amount are divided between state allocations of \$575 million, and direct federal funding of \$225 million. \$150 million of the federal funds were recently awarded through the Infrastructure Investment and Jobs Act (aka the Bipartisan Infrastructure Law) Mega Grant Program. The first phase of the Calcasieu River Bridge Improvements Project (I-10/I-210 West End to Ryan Street) is estimated to cost \$1.5 billion leaving a funding gap of \$700 million. That gap will be filled with private investment funds through a Private-Public Partnership (P3), which will complete the design, construct the project, and operate the facility over a 50-year period. The tolls collected will cover the P3 costs and pay the partners a return on their investment. An additional \$140 million has been committed from the State General Fund and the Highway Priority Program for right of way and other pre-construction costs. Without tolls, this project would not be financially feasible. LADOTD has been authorized by the legislature to move forward with a P3 for the first phase. The state will be responsible for the balance of the project from Ryan Street to I-10/I-210 East End. Measures to address the impacts of tolling on low-income persons include the establishment of a local auto-rate toll that will not exceed \$2.88 per trip expressed in 2021 dollars. A more comprehensive explanation is included in the Draft EIS, specifically pages 3-15 to 3-20. Toll rates will escalate over time with inflation.</p>

Date	Commenter Identified as Member of EJ Community?	Comment	Response
12/14/22	Unknown (Voicemail)	<p>Yes, this is Tim Miller in Lake Charles. I was reading in the paper about a proposed toll bridge. That’s probably the worst thing our so-called leaders can come out with. I got a GED in the Navy; I’m not very well-educated, but even I know companies don’t come to Louisiana now because of the high tax rates. For instance, Buc-ees, on and on and on. What is wrong with these people in Baton Rouge? I don’t understand. Don’t they know things are high and it’s going to get higher?</p>	<p>To date, \$800 million have been designated for the I-10 Calcasieu Bridge project. The sources of that amount are divided between state allocations of \$575 million, and direct federal funding of \$225 million. \$150 million of the federal funds were recently awarded through the Infrastructure Investment and Jobs Act (aka the Bipartisan Infrastructure Law) Mega Grant Program. The first phase of the Calcasieu River Bridge Improvements Project (I-10/I-210 West End to Ryan Street) is estimated to cost \$1.5 billion leaving a funding gap of \$700 million. That gap will be filled with private investment funds through a Private-Public Partnership (P3), which will complete the design, construct the project, and operate the facility over a 50-year period. The tolls collected will cover the P3 costs and pay the partners a return on their investment. An additional \$140 million has been committed from the State General Fund and the Highway Priority Program for right of way and other pre-construction costs. Without tolls, this project would not be financially feasible. LADOTD has been authorized by the legislature to move forward with a P3 for the first phase. The state will be responsible for the balance of the project from Ryan Street to I-10/I-210 East End. Measures to address the impacts of tolling on low-income persons include the establishment of a local auto-rate toll that will not exceed \$2.88 per trip expressed in 2021 dollars. A more comprehensive explanation is included in the Draft EIS, specifically pages 3-15 to 3-20. Toll rates will escalate over time with inflation.</p>

Date	Commenter Identified as Member of EJ Community?	Comment	Response
12/15/22	Unknown (Email)	<p>With all that the people of The Great State of LOUISIANA have been through in the last several years do you think we need to worry about buying a transponder and putting money on it to cross a bridge??????</p> <p>Look at the impact this toll would have on other local roads. I as a licensed commercial driver I AVOID TOLL ROADS AS MUCH AS POSSIBLE!!! By placing this toll on the bridge you are putting the motoring public at risk to drivers who Don't have any idea of the road traffic in this general area. As it is we have had way to many large closures on Interstate 10 from big wrecks. Can you honestly tell a father -mother - aunt or uncle that there (sic) loved ones won't be coming home anymore??</p> <p>Please reconsider this forced toll to cross the bridge and use another way to oay (sic) for it. Our future greatly DEPENDS on it. Thanks for your time and consideration of my message.</p>	<p>To date, \$800 million have been designated for the I-10 Calcasieu Bridge project. The sources of that amount are divided between state allocations of \$575 million, and direct federal funding of \$225 million. \$150 million of the federal funds were recently awarded through the Infrastructure Investment and Jobs Act (aka the Bipartisan Infrastructure Law) Mega Grant Program. The first phase of the Calcasieu River Bridge Improvements Project (I-10/I-210 West End to Ryan Street) is estimated to cost \$1.5 billion leaving a funding gap of \$700 million. That gap will be filled with private investment funds through a Private-Public Partnership (P3), which will complete the design, construct the project, and operate the facility over a 50-year period. The tolls collected will cover the P3 costs and pay the partners a return on their investment. An additional \$140 million has been committed from the State General Fund and the Highway Priority Program for right of way and other pre-construction costs. Without tolls, this project would not be financially feasible. LADOTD has been authorized by the legislature to move forward with a P3 for the first phase. The state will be responsible for the balance of the project from Ryan Street to I-10/I-210 East End. The P3 agreement will contain controls that ensures that tolling will not unduly burden any single mode of transportation, including freight. The controls will be drawn from national tolling norms and practices. Measures to address the impacts of tolling on low-income persons include the establishment of a local auto-rate toll that will not exceed \$2.88 per trip expressed in 2021 dollars. A more comprehensive explanation is included in the Draft EIS, specifically pages 3-15 to 3-20. Tolls rates will escalate over time with inflation. Most of the traffic diverting would use I-210 to avoid the toll. These results are based on Alternative 5G and are preliminary and subject to change. The Public-Private Partnership will determine the toll rates and timing of tolls to minimize diversions from I-10 and maximize the revenue from tolls. A preliminary tolling traffic and revenue analysis provided in Appendix F of the Draft EIS determined that variable rate tolling, with lower rates in non-peak times, would cause a 26% diversion in 2032 and a 24% diversion in 2042. It is anticipated, however, that some diverting traffic will eventually return to the tolled route because of convenience and overall timesaving.</p>

Date	Commenter Identified as Member of EJ Community?	Comment	Response
12/13/22	Unknown	<p>Okay. First, I would like to make a comment. This toll bridge is obviously against everybody's wishes and all the public input that was given years ago. And it's wrong to let a private company make money off of people having to cross a bridge every day going back and forth to work. And it's going to cause major traffic problems on 210 and 171.</p>	<p>To date, \$800 million have been designated for the I-10 Calcasieu Bridge project. The sources of that amount are divided between state allocations of \$575 million, and direct federal funding of \$225 million. \$150 million of the federal funds were recently awarded through the Infrastructure Investment and Jobs Act (aka the Bipartisan Infrastructure Law) Mega Grant Program. The first phase of the Calcasieu River Bridge Improvements Project (I-10/1-210 West End to Ryan Street) is estimated to cost \$1.5 billion leaving a funding gap of \$700 million. That gap will be filled with private investment funds through a Private-Public Partnership (P3), which will complete the design, construct the project, and operate the facility over a 50-year period. The tolls collected will cover the P3 costs and pay the partners a return on their investment. An additional \$140 million has been committed from the State General Fund and the Highway Priority Program for right of way and other pre-construction costs. Without tolls, this project would not be financially feasible. LADOTD has been authorized by the legislature to move forward with a P3 for the first phase. The state will be responsible for the balance of the project from Ryan Street to I-10/I-210 East End. Measures to address the impacts of tolling on low-income persons include the establishment of a local auto-rate toll that will not exceed \$2.88 per trip expressed in 2021 dollars. A more comprehensive explanation is included in the Draft EIS, specifically pages 3-15 to 3-20. Toll rates will escalate over time with inflation. Most of the traffic diverting would use I-210 to avoid the toll. These results are based on Alternative 5G and are preliminary and subject to change. The Public-Private Partnership will determine the toll rates and timing of tolls to minimize diversions from I-10 and maximize the revenue from tolls. A preliminary tolling traffic and revenue analysis provided in Appendix F of the Draft EIS determined that variable rate tolling, with lower rates in non-peak times, would cause a 26% diversion in 2032 and a 24% diversion in 2042. It is anticipated, however, that some diverting traffic will eventually return to the tolled route because of convenience and overall timesaving. Funding Commitments and Sources for Construction of the I-10 Calcasieu River Bridge Improvements Project are listed below.</p> <ul style="list-style-type: none"> • \$ 85 million – State General Obligation Bonds - \$10 million in Priority 1 + \$75 million in Priority 5 • \$ 30 million – Coronavirus Response and Relief Supplement Act (CRRSA) – federal legislation enacted in December 2020 • \$ 50 million – Louisiana Rescue Plan Fund (e.g., 2021 American Rescue Plan) – 2021 Appropriation through Act 485 • \$100 million – Louisiana Rescue Plan Fund (e.g., 2021 American Rescue Plan) – 2022 Appropriation through Act 117 • \$100 million – State General Fund – 2022 Appropriation through Act 167 • \$150 million – Infrastructure Investment and Jobs Act (IIJA) – 2022

			discretionary grant award (\$600 million requested) • \$240 million – First six years of Vehicle Sales Tax – dedication through Act 486 (2021)/Act 505 (2022) • \$ 45 million – Transportation Trust Fund (Federal) – allocation from Highway Priority Program \$800million–Total funding commitments for construction.
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3.1.2. Commitments to Practicable Mitigation Measures

Agencies besides FHWA and LADOTD have regulatory jurisdiction over resources and issues that will be affected by the proposed project. These agencies must approve the proposed activities before the project can be constructed. Permits and other types of authorizations are described below. Where adverse impacts are anticipated, mitigation measures must be implemented. These and other commitments to offset impacts and formalize agreements are also described. **Table 12** identifies those agencies who have committed to engaging in practicable mitigation measures for this project.

Table 12: Permits, Mitigation, and Commitments

ITEM / RESOURCE	AGENCY / AUTHORITY	MITIGATION / COMMITMENT
General Permit / Storm Water Discharges from Construction Activities	LDEQ / Louisiana Pollutant Discharge Elimination System	Preparation of a Storm Water Pollution Prevention Plan (SWPPP) that will outline specific BMPs to mitigate stormwater runoff impact to water quality during construction.
Commitment / Community Outreach to Environmental Justice Communities	LADOTD	LADOTD will conduct targeted community outreach to Environmental Justice 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.

ITEM / RESOURCE	AGENCY / AUTHORITY	MITIGATION / COMMITMENT
Mitigation / Traffic Noise Abatement Measures	FHWA and LADOTD / 23 CFR part 772	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 ; 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.
Compliance / Floodplain Encroachment	LADOTD / FHWA, FEMA, and State and Local Floodplain Managers / 23 CFR 650, Subpart A	Studies conducted 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
Due Diligence / Hazardous Waste Sites and Risks to Human Health and the Environment	LDEQ and USEPA / Resource Conservation and Recovery Act, Comprehensive Environmental Response Compensation and Liability Act, and LAC Title 33, V. Subpart 1.	Groundwater monitoring in the vicinity of EDC and related contaminant releases (by responsible parties); minimization of ground and groundwater disturbances from construction activities; soil and groundwater sampling during all ground disturbing activities to monitor the migration of contamination. Air monitoring to detect harmful volatile organic compounds (VOCs) will be conducted when necessary. Preparation of Safety and Protection Plan and worker training for disturbing activities; providing Personnel Protective Equipment (PPE); further evaluation for ROW/property acquisitions as needed.

ITEM / RESOURCE	AGENCY / AUTHORITY	MITIGATION / COMMITMENT
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.
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. Best management practices 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 USEPA / 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 all ground disturbing activities. Preparation of Safety and Protection Plan and worker training for disturbing activities; provide Personnel Protective Equipment (PPE); further evaluation for ROW / property acquisitions as needed.

ITEM / RESOURCE	AGENCY / AUTHORITY	MITIGATION / COMMITMENT
Commitment / Tolling	LADOTD / Commitment	A local toll rate could be as low as 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 MPO to design and construct them.
Commitment / DBE and Workforce Development	LADOTD / P3	DOTD commits to developing a P3 Project-Specific Disadvantaged Business Outreach and Participation Plan. See Section 2.4.7 for details.
Commitment / Rail Spur Relocation	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.

3.1.3. Substantial Need for the Project

There is a **substantial need** for this Project because the geometric and structural design of I-10 and the I-10 Calcasieu River Bridge does not meet current design guidelines for freeways, ramps, and frontage roads for this section of the Interstate Highway System. The age and structural issues of the existing bridge limit its useful life. The bridge was built in the 1950s and has reached the end of its serviceable life. There has been strong and sustained public interest over the twenty (20) years since this Project was initiated. Given the age of the bridge and its continued deterioration, public interest in replacing the bridge has increased substantially.

Rehabilitation has been undertaken to keep the bridge in service but any solution including systems, demand, or lane management would have to include replacement of the existing bridge to address structural issues. The configuration of the interchange at Sampson Street and presence of at-grade railroad crossings does not adequately serve the existing and planned future traffic in Westlake. The number of crashes in the I-10 Calcasieu River Bridge Improvements Project corridor surpassed statewide averages for crashes on facilities in the same safety classification. Re-use of the existing bridge in conjunction with a new bridge on a parallel alignment, Transportation Systems Management, Transportation Demand Management, and High Occupancy Vehicle Lanes were considered to address

congestion and mobility but was eliminated from further consideration because it does not meet the need to upgrade the bridge to current design guidelines.

3.1.4. Alternatives DHAE Comparison

A detailed analysis of the three reasonable alternatives (**Alternatives 3A, Alternative 3E, and Alternative 5G**) was performed and can be found in **Section 2.4** of Chapter 2 in the DEIS. This analysis determined each Alternative's associated impacts and benefits, and how well each Alternative addresses concerns raised by the public and agencies. The West End Improvements and East End Improvements are the same for the three alternatives. The differences among them are contained within the center section of the corridor, designated the Bridge Alternatives section.

Alternatives 3A and 3E are anticipated to eventually induce land use changes along Sulphur Avenue from Sampson Street to the Calcasieu River. Both these Alternatives would include an additional bridge across the Calcasieu River that would cause impacts to navigation. It is estimated that the third bridge would add over \$100 million to Project construction costs. With an extension and new river crossing as proposed, traffic volumes on this street would increase and likely convert residential uses to commercial. An extension of Sulphur Avenue and a third bridge is not proposed for **Alternative 5G**, which would be the least costly to construct. However, while **Alternative 5G** would not induce any changes, relocation of the railroad spurs would affect an EJ neighborhood and commercial corridor in Westlake south of Pilley Street.

Alternative 3E would require the largest number of acres of additional ROW and would be the costliest to build. Potential residential relocations would be the same for **Alternative 3A, Alternative 3E, and Alternative 5G**. A particular concern was the potential impacts to the Westlake neighborhood between Pilley Street and Railroad Avenue from the railroad spur relocations for **Alternative 5G**. The spur relocations could also require acquisition of ROW from riverfront property east of Miller Avenue. Based on comments received from the public and agencies, and after coordination with Union Pacific and Kansas City Southern Railroads, Railroad Relocation Option 2 was selected as the option that would best satisfy the needs of all parties, although it would increase business displacements to three for **Alternative 5G** compared to two for **Alternatives 3A and 3E**.

A "**No-Build Alternative**" is always included in an Alternatives Analysis in case the impacts from the proposed actions are so great that it is better not to do anything. It also serves as a baseline against which other alternatives can be compared; however, "no-build" in the case of this project, does not equate 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**.

Table 13 depicts a comparison of DHAEs across all three Build Alternatives.

Table 13: Comparison of DHAEs across all Build Alternatives

	Alternative 3A		Alternative 3E		Alternative 5G	
	EJ Communities	Non-EJ / Reference Communities	EJ Communities	Non-EJ / Reference Communities	EJ Communities	Non-EJ / Reference Communities
Right of Way	~75 acres	~10 acres	~80 acres	~10 acres	~58 acres	~10 acres
Residential Displacements	21	0	21	0	20	0
Business Displacements	13	1	13	1	16	1
Noise (impacted receptors)	260	27	257	27	256	27
Significant Trees	Impacted	Not impacted	Impacted	Not Impacted	Impacted	Not Impacted

The **No-Build Alternative** would have fewer DHAEs on protected and affected populations such as EJ communities, but this Alternative would not solve any of the problems identified in the Project’s Purpose and Need because the existing bridge is in poor condition and normal maintenance is not considered adequate to keep the existing bridge in service. The existing bridge is also geometrically deficient and would require major reconstruction to meet current design guidelines.

Attachment A: 2019 EJ Screen Data



Location: User-specified polygonal location

Ring (buffer): 0-miles radius

Description:

Summary of ACS Estimates		2015 - 2019
Population		8,778
Population Density (per sq. mile)		740
People of Color Population		7,201
% People of Color Population		82%
Households		4,008
Housing Units		4,955
Housing Units Built Before 1950		1,458
Per Capita Income		27,607
Land Area (sq. miles) (Source: SF1)		11.86
% Land Area		88%
Water Area (sq. miles) (Source: SF1)		1.64
% Water Area		12%

	2015 - 2019 ACS Estimates	Percent	MOE (±)
Population by Race			
Total	8,778	100%	596
Population Reporting One Race	8,650	99%	1,243
White	1,671	19%	479
Black	6,878	78%	596
American Indian	24	0%	55
Asian	12	0%	38
Pacific Islander	0	0%	13
Some Other Race	65	1%	62
Population Reporting Two or More Races	128	1%	415
Total Hispanic Population	163	2%	70
Total Non-Hispanic Population	8,615		
White Alone	1,577	18%	479
Black Alone	6,861	78%	596
American Indian Alone	24	0%	55
Non-Hispanic Asian Alone	12	0%	38
Pacific Islander Alone	0	0%	13
Other Race Alone	21	0%	34
Two or More Races Alone	120	1%	415
Population by Sex			
Male	4,217	48%	295
Female	4,561	52%	369
Population by Age			
Age 0-4	552	6%	154
Age 0-17	1,816	21%	252
Age 18+	6,962	79%	290
Age 65+	1,628	19%	188

Data Note: Detail may not sum to totals due to rounding. Hispanic population can be of any race.

N/A means not available. **Source:** U.S. Census Bureau, American Community Survey (ACS) 2015 - 2019



Location: User-specified polygonal location
 Ring (buffer): 0-miles radius
 Description:

	2015 - 2019 ACS Estimates	Percent	MOE (±)
Population 25+ by Educational Attainment			
Total	6,129	100%	330
Less than 9th Grade	731	12%	169
9th - 12th Grade, No Diploma	799	13%	139
High School Graduate	2,221	36%	274
Some College, No Degree	1,511	25%	131
Associate Degree	207	3%	71
Bachelor's Degree or more	660	11%	159
Population Age 5+ Years by Ability to Speak English			
Total	8,226	100%	507
Speak only English	7,931	96%	457
Non-English at Home ¹⁺²⁺³⁺⁴	295	4%	108
¹ Speak English "very well"	231	3%	108
² Speak English "well"	45	1%	41
³ Speak English "not well"	2	0%	35
⁴ Speak English "not at all"	17	0%	30
³⁺⁴ Speak English "less than well"	19	0%	35
²⁺³⁺⁴ Speak English "less than very well"	64	1%	41
Linguistically Isolated Households*			
Total	48	100%	41
Speak Spanish	17	36%	27
Speak Other Indo-European Languages	30	63%	39
Speak Asian-Pacific Island Languages	0	1%	13
Speak Other Languages	0	0%	13
Households by Household Income			
Household Income Base	4,008	100%	207
< \$15,000	1,248	31%	166
\$15,000 - \$25,000	852	21%	136
\$25,000 - \$50,000	889	22%	139
\$50,000 - \$75,000	434	11%	83
\$75,000 +	585	15%	113
Occupied Housing Units by Tenure			
Total	4,008	100%	207
Owner Occupied	1,879	47%	160
Renter Occupied	2,128	53%	157
Employed Population Age 16+ Years			
Total	7,078	100%	388
In Labor Force	3,833	54%	321
Civilian Unemployed in Labor Force	314	4%	110
Not In Labor Force	3,245	46%	266

Data Note: Detail may not sum to totals due to rounding. Hispanic population can be of anyrace.

N/A means not available. **Source:** U.S. Census Bureau, American Community Survey (ACS)

*Households in which no one 14 and over speaks English "very well" or speaks English only.



Location: User-specified polygonal location

Ring (buffer): 0-miles radius

Description:

	2015 - 2019 ACS Estimates	Percent	MOE (±)
Population by Language Spoken at Home*			
Total (persons age 5 and above)	8,298	100%	758
English	8,039	97%	765
Spanish	45	1%	32
French	160	2%	33
French Creole	N/A	N/A	N/A
Italian	N/A	N/A	N/A
Portuguese	N/A	N/A	N/A
German	0	0%	18
Yiddish	N/A	N/A	N/A
Other West Germanic	N/A	N/A	N/A
Scandinavian	N/A	N/A	N/A
Greek	N/A	N/A	N/A
Russian	N/A	N/A	N/A
Polish	N/A	N/A	N/A
Serbo-Croatian	N/A	N/A	N/A
Other Slavic	N/A	N/A	N/A
Armenian	N/A	N/A	N/A
Persian	N/A	N/A	N/A
Gujarathi	N/A	N/A	N/A
Hindi	N/A	N/A	N/A
Urdu	N/A	N/A	N/A
Other Indic	N/A	N/A	N/A
Other Indo-European	25	0%	66
Chinese	0	0%	18
Japanese	N/A	N/A	N/A
Korean	0	0%	18
Mon-Khmer, Cambodian	N/A	N/A	N/A
Hmong	N/A	N/A	N/A
Thai	N/A	N/A	N/A
Laotian	N/A	N/A	N/A
Vietnamese	11	0%	24
Other Asian	0	0%	18
Tagalog	2	0%	18
Other Pacific Island	N/A	N/A	N/A
Navajo	N/A	N/A	N/A
Other Native American	N/A	N/A	N/A
Hungarian	N/A	N/A	N/A
Arabic	16	0%	23
Hebrew	N/A	N/A	N/A
African	N/A	N/A	N/A
Other and non-specified	0	0%	18
Total Non-English	259	3%	1,077

Data Note: Detail may not sum to totals due to rounding. Hispanic population can be of any race.

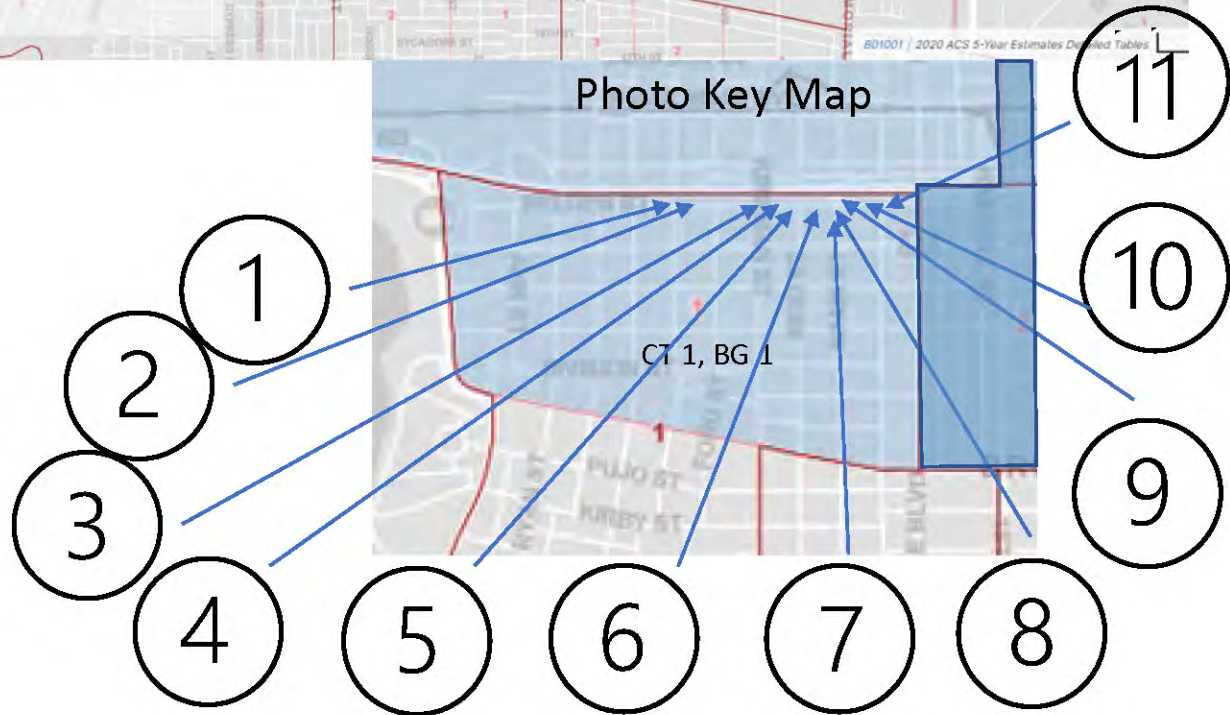
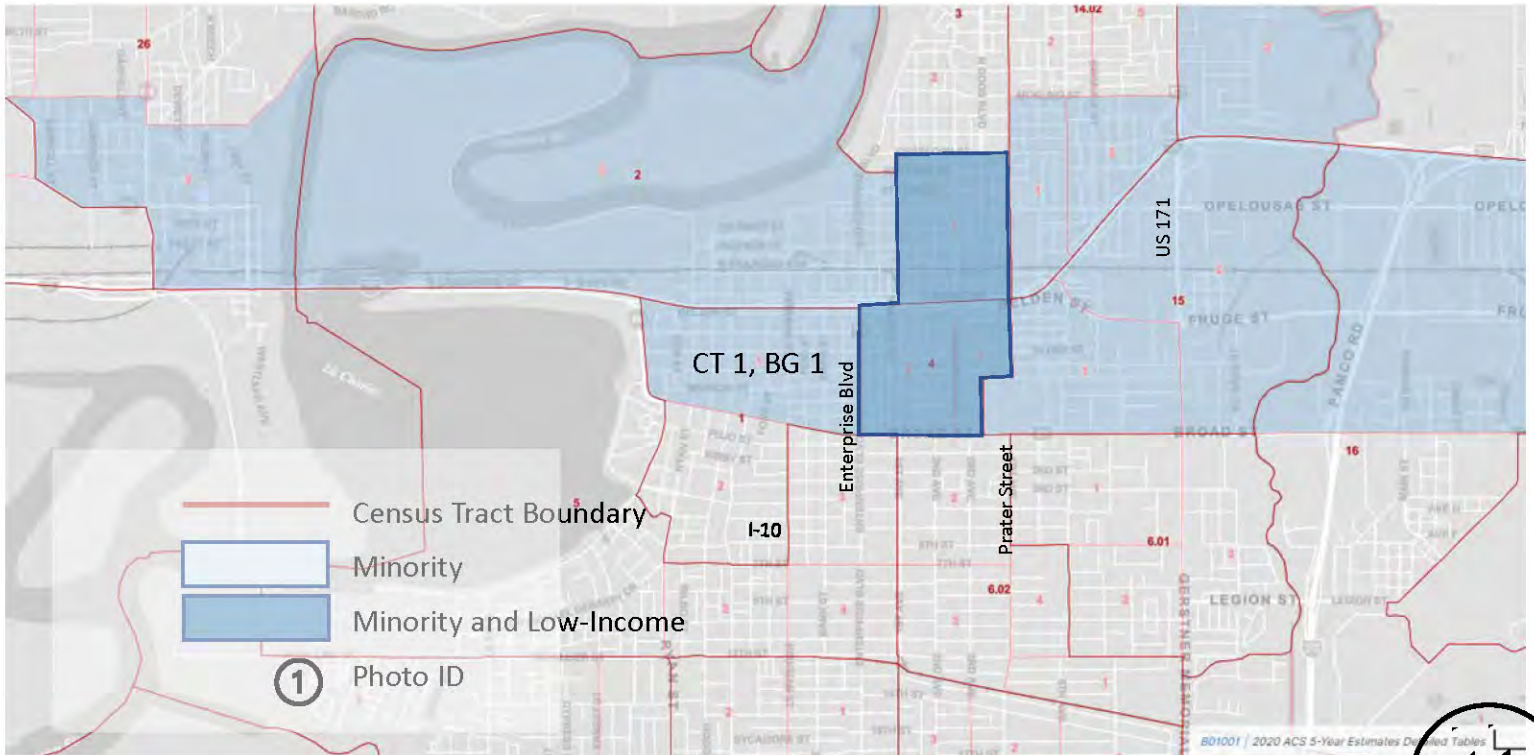
N/A means not available. **Source:** U.S. Census Bureau, American Community Survey (ACS) 2015 - 2019.

*Population by Language Spoken at Home is available at the census tract summary level and up.

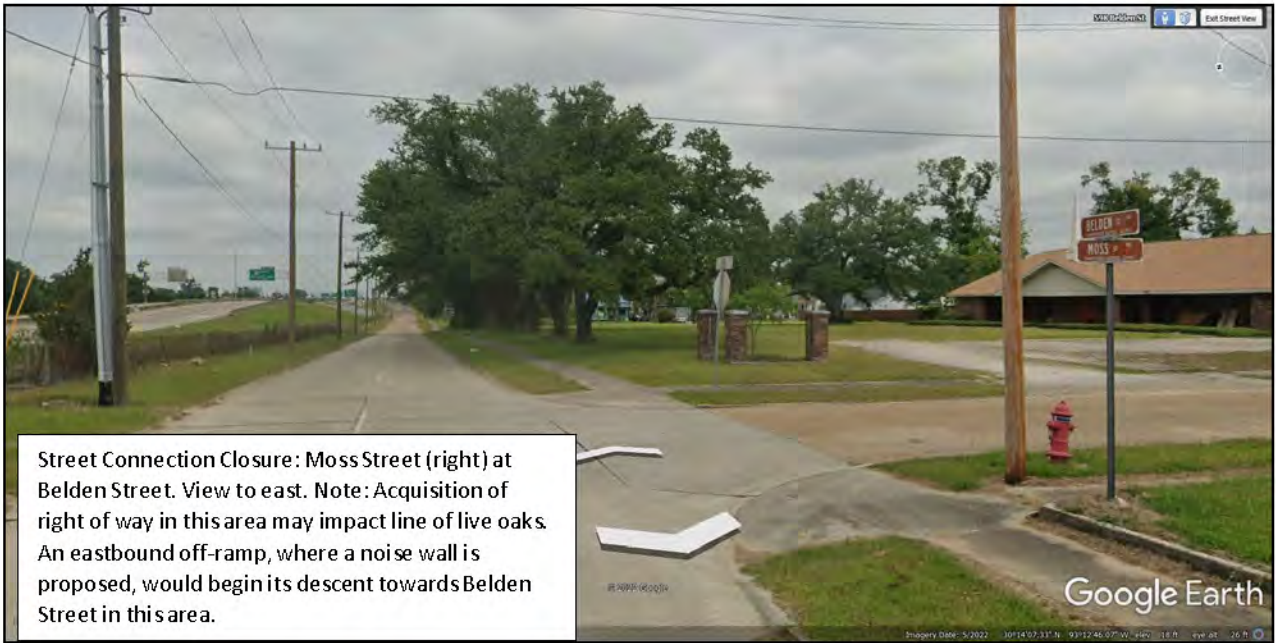
Attachment B: Photolog of Impacted Neighborhoods in Lake Charles

Census Tract 1, Block Group 1 Neighborhood Impact Photos April-May 2022

South of I-10, West of Enterprise Boulevard
Identified as Minority



1



Street Connection Closure: Moss Street (right) at Belden Street. View to east. Note: Acquisition of right of way in this area may impact line of live oaks. An eastbound off-ramp, where a noise wall is proposed, would begin its descent towards Belden Street in this area.

2



Displacement: 712 Belden Street between Ford and Kirkman Streets. View to east. Note: Additional right of way in this area may impact line of live oaks. The eastbound off-ramp, where a noise wall is proposed, would touch down at Belden Street in this area.

3



Displacement: 302 Kirkman Street S at Belden Street (right) between Ford and Kirkman Streets. View to southwest. Note: Kirkman Street will stay open to through traffic.

4



Displacement: 301 Kirkman Street at Belden Street (left) between Kirkman and Reid Streets. View to east. Note: Kirkman Street will stay open to through traffic.

5



Displacement: 303 Reid Street (right) at Belden Street (left) between Reid and Bank Streets. View to southeast.

6



Displacement: 900 block of Belden Street (left) between Reid and Bank Streets. View to southeast. Note: Located on same tax parcel as 303 Reid Street.

7



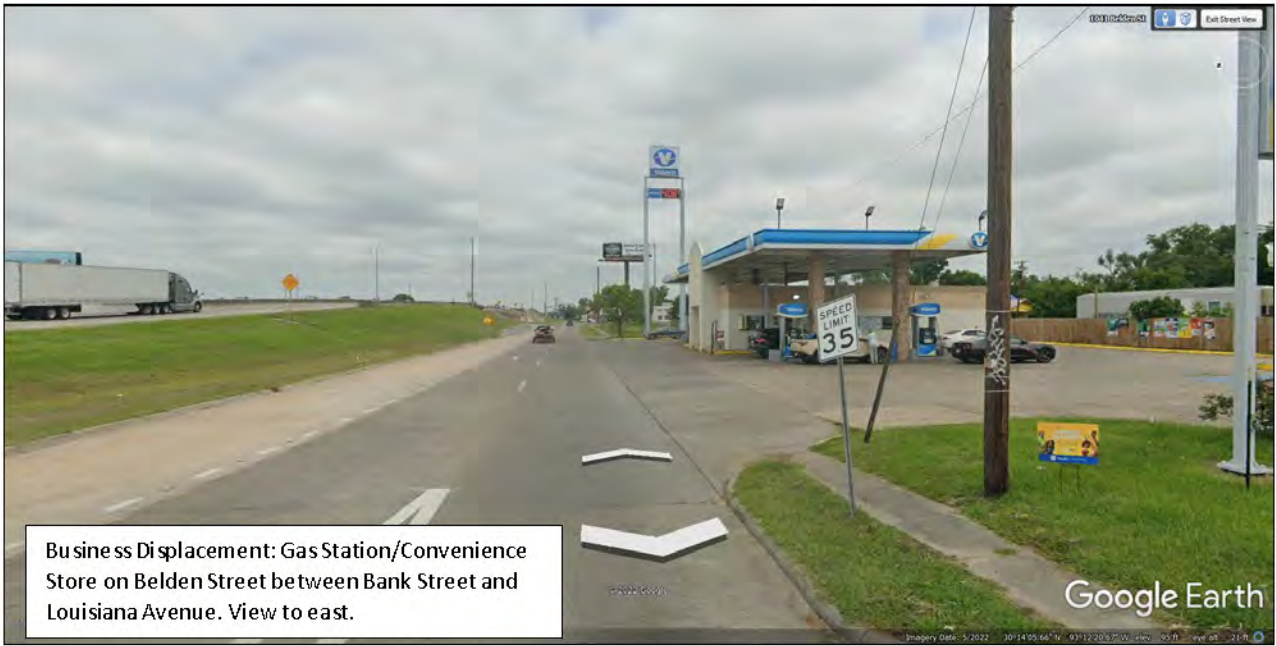
8



9



10



Business Displacement: Gas Station/Convenience Store on Belden Street between Bank Street and Louisiana Avenue. View to east.

11

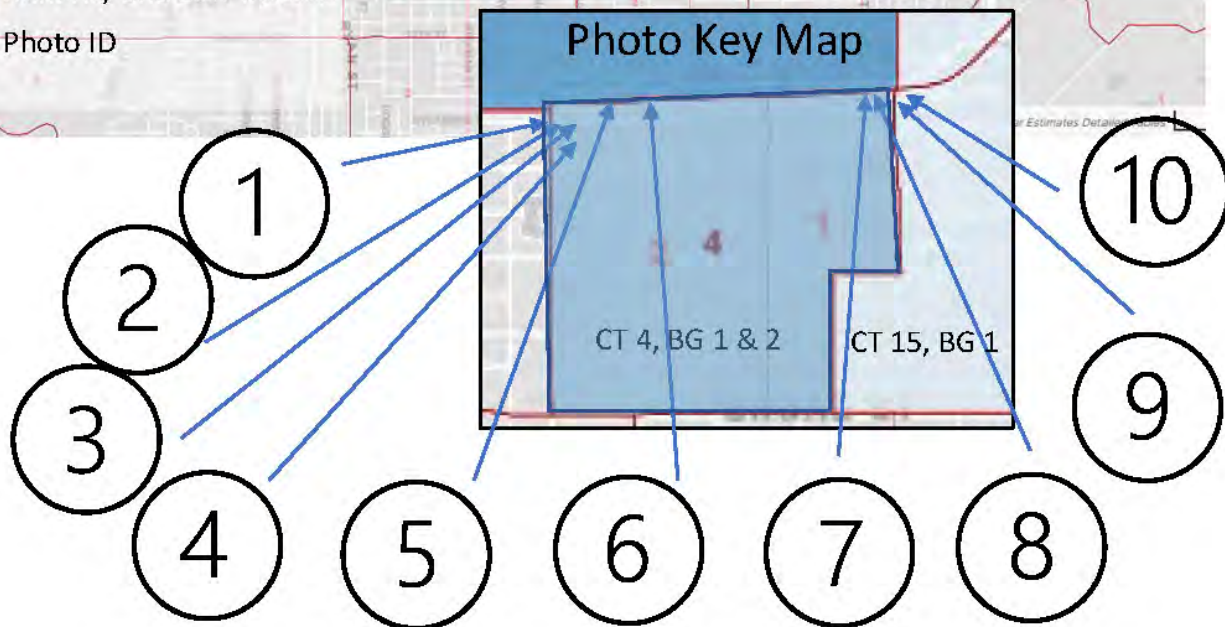
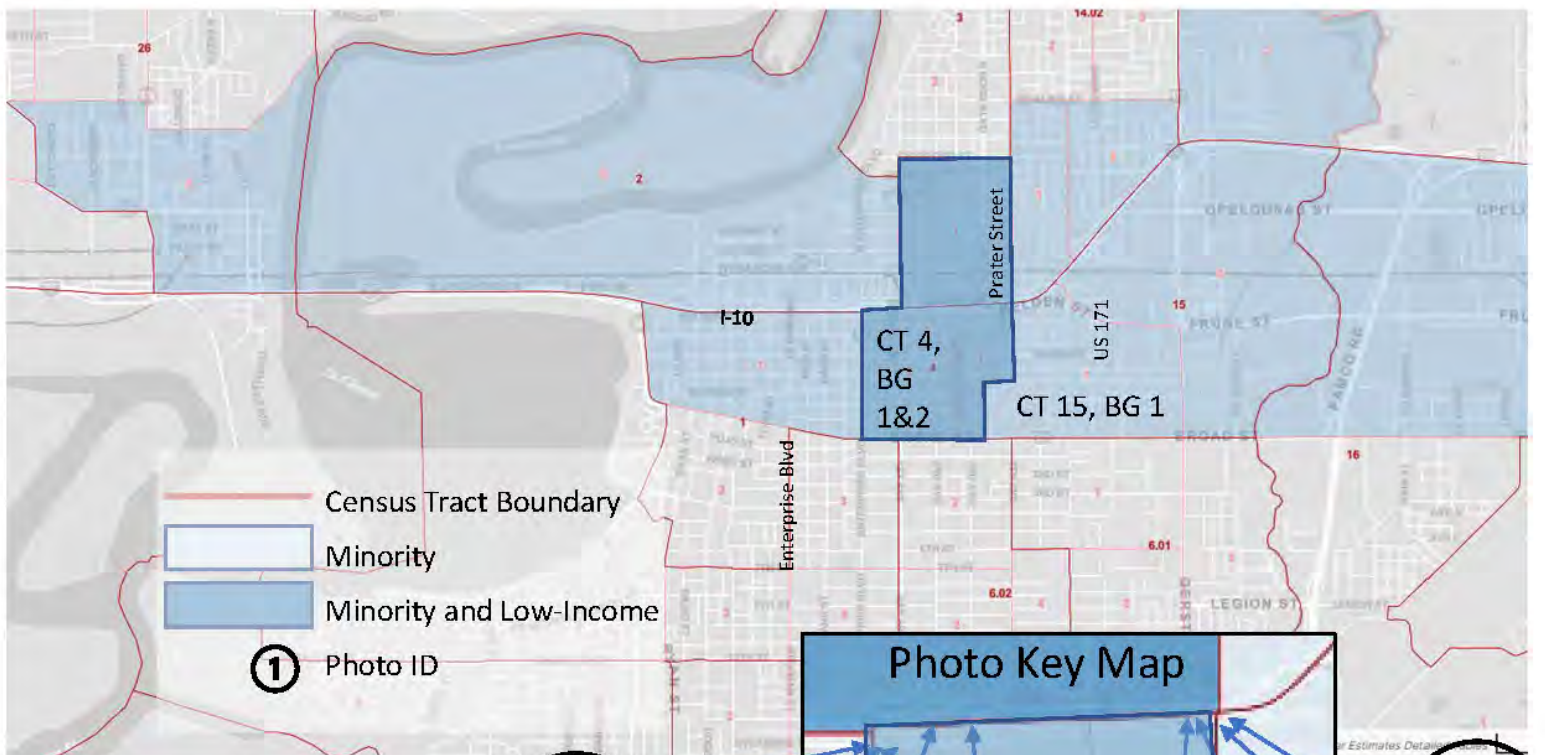


Street Connection Closure: Belden Street (left) at Louisiana Avenue (right). View to southeast.

Census Tract 4, Block Group 1 and 2*, Census Tract 15, Block Group 1
Neighborhood Impact Photos
April-May 2022

South of I-10, West of Enterprise Boulevard

*Identified as Minority and Low-Income



1



Remain Open to Thru Traffic: Enterprise Boulevard (aka Nellie Lutcher Memorial Parkway) at Belden Street. View to south.

2



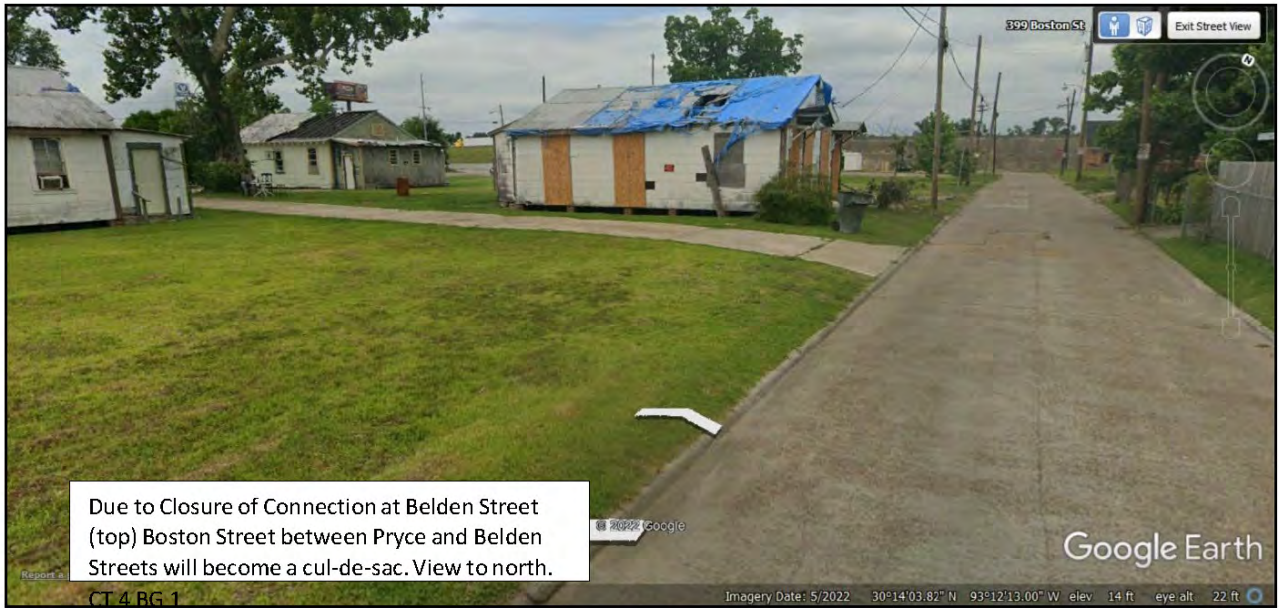
Business Displacement Due to Control of Access: Fast Food Restaurant on Belden Street at Enterprise Boulevard. View to east.

3



Displacement: Church at 1230 Belden Street and Street Connection Closure: Boston Street (right) at Belden Street. View to southwest. Note main church entrance fronts on Belden Street.

4



Due to Closure of Connection at Belden Street (top) Boston Street between Pryce and Belden Streets will become a cul-de-sac. View to north.

5



Underpass of I-10 Closure: VE Washington Street at Belden Street. View to north. Note: VE Washington Street connection to Belden Street (south) will remain open.

6



Underpass of I-10 Closure: Fry Street at Belden Street. View to north. Note: Fry Street terminates at Belden Street.

7



Displacement: Fast Food Restaurant at 1916 Belden Street between Goos and Prater Streets. View to southeast. Note: converted to business use in 2022 and still counted as residential.

Google Earth

8



Displacement: 1920 Belden Street Prater Street

Displacement (House with Blue Roof): 1920 Belden Street between Goos Street and Prater Streets (left). View to south.

Google Earth

9



Displacement: 309 Prater Street at Belden Street (left). View to east northeast.

Google Earth

10



Displacement: 2002 Belden Street between Prater Street and Cherry Street. View to south.

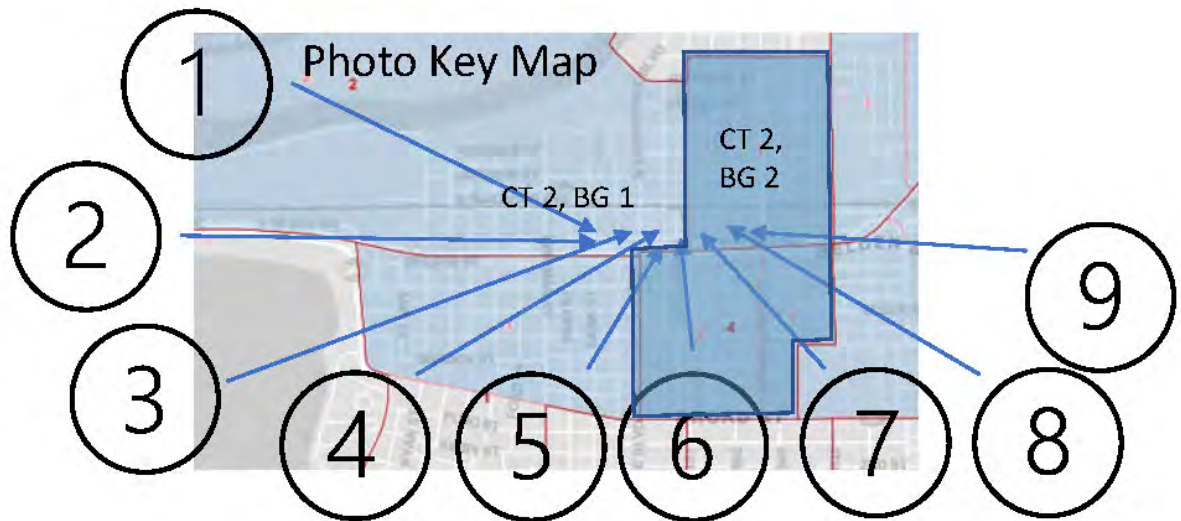
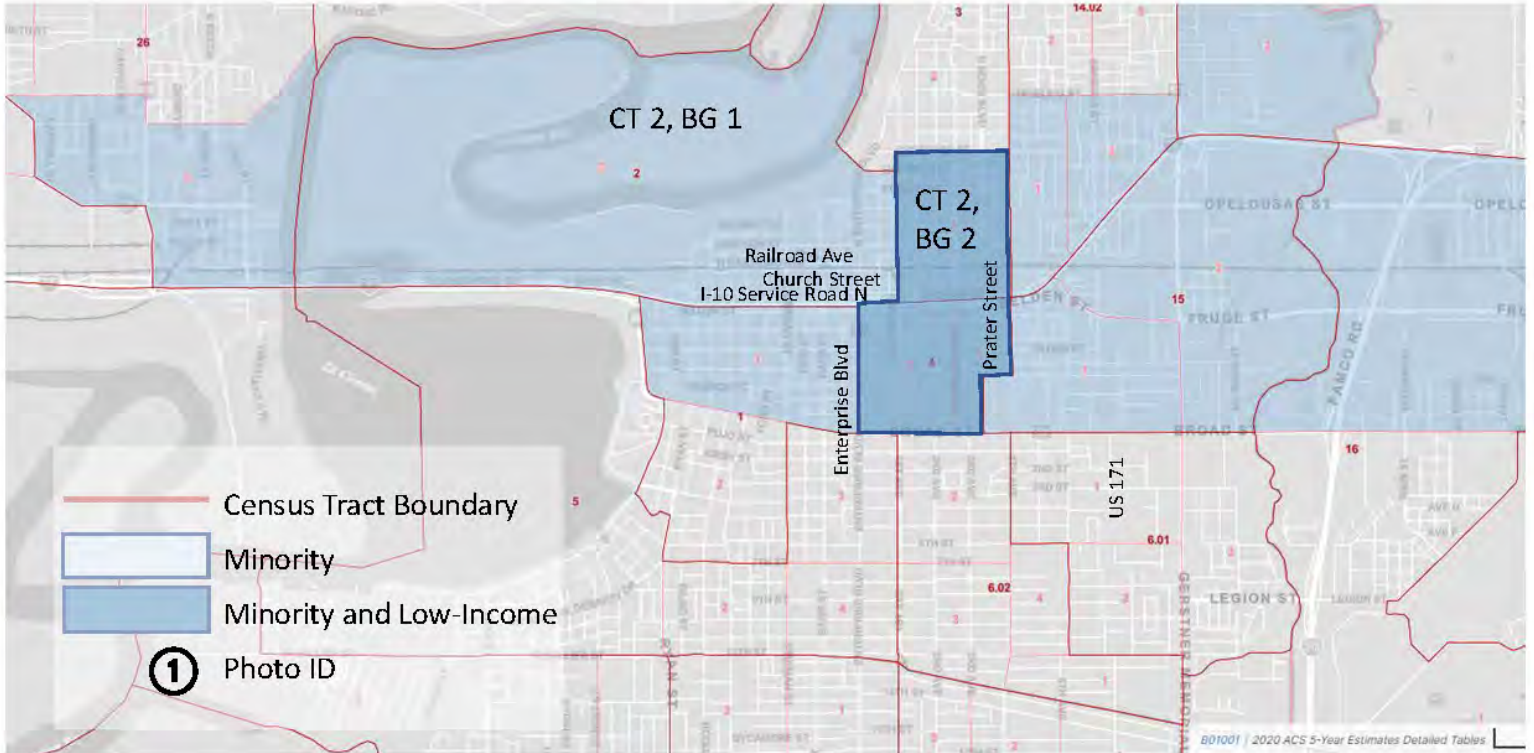
10



Displacement: 2006 Belden Street between Prater Street and Cherry Street. View to south.

Census Tract 2, Block Group 1 & 2*
Neighborhood Impact Photos
April-May 2022

North of I-10, West of Enterprise Boulevard
Identified as Low-Income and Minority



1



Street Closure: Louisiana Avenue between Church Street and I-10 Service Road N. will be closed and demolished. View to south.

Google Earth

2



Street Connection Closure: Louisiana Avenue at I-10 Service Road N. View to north.

Google Earth

2



Displacement: 211 Louisiana Avenue at I-10 Service Road N (right). View to east.

Google Earth

3



Street Connection Closure: Church Street from point shown to Enterprise Boulevard will be closed and demolished. View to east. Note: Access from Enterprise Boulevard side road to I-10 Service Road (right) will remain open.

4



Street Connection Closure: Church Street between Boston Street (right) to Enterprise Boulevard (top) will be closed and demolished. View to west. Note: Access to Enterprise Boulevard side road from I-10 Service Road (top left) will remain open.

4



Street Closure: Boston Street between Church Street and I-10 Service Road N (top) will be closed and demolished. View to south.

5



6



6



6



Displacement: 1302 N. Church Street.

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Google Earth

7



Street Connection Closure: VE Washington and I-10 Service Road N (right and left) will be closed.

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Google Earth

7



Street Closure: VE Washington between Church Street and I-10 Service Road N (top) will be closed and demolished. View to south. Note: VE Washington underpass of I-10 will be closed.

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Google Earth

8



Displacement: No address 1st Avenue at Church Street. View to east. Note: Displacement for proposed extension of Church Street to Lyons Street

Google Earth

9



Displacement: 202 Fry Street. View to northeast. Note: Displacement for proposed extension of Church Street to Lyons Street.

Google Earth

9



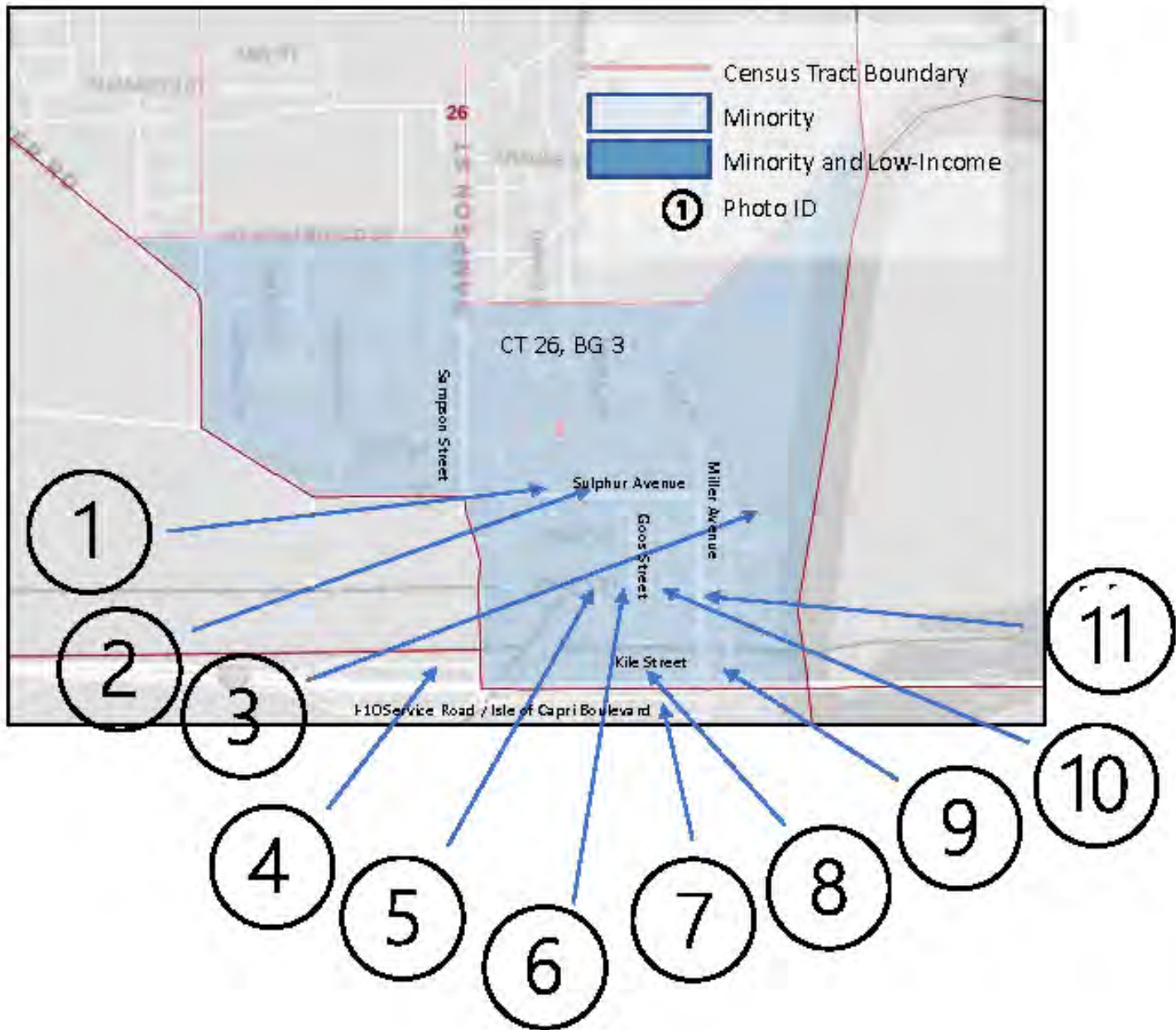
Street Closure: 202 Fry Street from this point to I-10 Service Road N (top) will be closed and demolished. View to south. Note: Fry Street underpass of I-10 (background) will be closed.

Google Earth

Attachment C: Photolog of Impacted Neighborhoods in Westlake

Census Tract 26, Block Group 3
Neighborhood Impact Photos
April-May 2022

North of I-10 in Westlake, LA
Identified as Low-Income



1



2



3



4



Displacement (All Alts): Gas Station / Convenience Store on WB on-ramp to I-10 from Sampson. Business closed.

Census Tract 32, Block Group 1

5



At-Grade Crossing Closure (Alt 5G only): Hilma Street crossing of the KCS railroad would be eliminated, closing access on the north and south sides of Pilley Street. View to north.

5



Rail Spur Relocation (Alt 5G only): The KCS rail spur (track on left) would be relocated. View from Pilley (right) and Hilma (left) to southwest. Note: a new local street on the south side of the tracks would provide east-west movement between Goos and Magnolia Streets.

6



533 Goos Steet at Pilley and the railroad. At-Grade Crossing at this location to be fitted with Crossing Gates and Flashers..

7



At-grade Crossing Closure (Alt 5G only): Crossing of the relocated KCS spur track would be prohibited, closing access on the north and south sides of Magnolia Street. View to south.

8



Displacement (All Alts): 400 Kile Street. View to north.

8



Displacement (All Alts): 404 Kile Street. View to north.

9



Displacement (All Alts): Port of Lake Charles Warehouses. View to northeast.

10



At-grade Crossing Closure at Magnolia Street (Alt 5G only): Crossing of the KCS railroad at Pilley Street would be eliminated, closing access on the north and south sides of Street.. View to south.

11



Business Displacement (Alt 5G only): Commercial Property at 520 Miller Avenue. No business activities identified. View to east.

11



Displacement (Alt 5G only): Commercial Structure at 533 Miller Avenue at Pilley Street (right). View to west. Note: no business activities identified.

11



Displacement (Alt 5G only): Commercial Warehouse at 523 Miller Avenue. View to southwest.