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May 25, 2023

Jason Roach, Senior Environmental Planner
Division of Environmental Planning (Project EA 07-39020)
California Department of Transportation, District 7
100 South Main Street, MS 16A
Los Angeles, CA 90012

RE: File: 07-LA-047-PM 0.9/2.0, EA 07-39020, EFIS 0722000334 Vincent Thomas Bridge (VTB) Deck Replacement Project

Dear Mr. Roach,

We write in response to your request for comments on the above-mentioned matter.

The International Longshore and Warehouse Union (ILWU) represents dockworkers in and around the Port of Los Angeles (POLA) and the Port of Long Beach (POLB), which combined form the San Pedro Bay Ports (SPBP). More specifically, ILWU Local 13 represents Longshore Workers, ILWU Local 63 represents Marine Clerks, and ILWU Local 94 represents Foremen. These three Locals represent over 17,000 workers that provide labor to the marine terminal operators in the SPBP. Consequently, ILWU members traverse the VTB, 24 hours a day, 365 days a year, to provide essential labor for the nation's largest maritime gateway.

To provide proper perspective, the next largest maritime portal is New York - New Jersey, which is approximately half of the size of the POLA/POLB. Additionally, it is important to recognize the following:

- 1) Cargo coming through the SPBP reaches all 435 Congressional Districts throughout the United States.
- 2) The Los Angeles Metropolitan Area is among the top three manufacturing centers in the country and relies on imported components that come through the SPBP to fulfill its work.
- 3) Nearly 1 in 9 jobs in the Counties of Los Angeles, Orange, Riverside, San Bernardino, and Ventura are related to the SPBP.
- 4) Nearly 1 in 5 jobs in the City of Long Beach are related to the SPBP.
- 5) Lastly, the State of California generates billions of dollars of economic activity related to trade at the SPBP.

Obviously, the VTB is a critical artery in the circulation of traffic throughout the San Pedro Bay and must be properly maintained. However, it is extremely important that the projects being considered for the VTB Deck Replacement be completed as efficiently as possible and every opportunity taken to mitigate the negative consequences of the necessary improvements.

Each of the three options that are currently being discussed will reroute some or all the VTB traffic onto detours within the communities of Wilmington, Harbor City, San Pedro, and Long Beach. Consequently, these communities will bear the brunt of the increased traffic, congestion, accidents, noise, and pollution that these diversions will create. To minimize the negative impacts on these communities, as well as the SPBP that employ many of these same residents, we respectfully suggest the following:

- 1) Each of the identified detour routes must be in excellent condition prior to the initiation of construction on the VTB. In particular, Harry Bridges Boulevard, Alameda Street, Anaheim Street, John S. Gibson Boulevard and Henry Ford Boulevard are presently in terrible condition and must be improved immediately. This combination of roads will undoubtedly comprise the primary detours utilized throughout the VTB construction project and if not improved, will force traffic into the residential neighborhoods of the surrounding communities.
- 2) Coordinating additional law enforcement resources to ensure that excessive commercial traffic does not invade residential neighborhoods for illegal detours, staging or parking of containers, chassis or heavy-duty equipment.
- 3) Restricting traffic over the VTB during construction to passenger cars only. Heavy-duty commercial trucks often struggle to cross the span and frequently break down in the process.
- 4) Use of tow truck(s) to be stationed and standing-by at each end of the VTB to quickly remove any vehicles that have been involved in an accident or have broken down on the bridge, thereby reducing their impact on traffic.
- 5) Implementing a water-taxi service(s) to reduce the number of commuters going over the bridge at peak times to ensure that Terminal Island workers can commute without costly, excessive, polluting drive times.
- 6) Terminal Island is a food desert with extremely limited meal options for workers. Commercial food trucks should be subsidized to serve the workers on Terminal Island, so that meal-hour traffic can be minimized.
- 7) Coordination must be pursued with Class 1 Railroad Companies, Burlington Northern – Sante Fe and Union Pacific, along with Pacific Harbor Lines to ensure that railcar staging, and train building occurs at off-peak times that will not interfere with the regularly scheduled dispatching of workers to Terminal Island.

This is a non-exhaustive list of recommendations that we hope will be a starting point for on-going conversations around this very complex and important issue. Several of these suggestions were also shared during a May 19, 2023, meeting between Caltrans and ILWU officials. We remain available to answer any additional questions or to provide any clarification that will assist Caltrans in the decision-making process.

Sincerely,



Gary Herrera
President
Local 13



Joe Gasperov
President
Local 63



Daniel G. Miranda
President
Local 94

cc: Toks Omishakin, Secretary, California State Transportation Agency (CalSTA)
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