

Mar 7, 2024

Dear Mayor and Assembly,

There is considerable public interest in a scaled-down version of the Lutak dock rebuild, and there are still nearly seven months until MARAD's statutory deadline of Sept. 30th. Rather than trying to produce a completely new **alternative**, I suggest that a design **modification** of the existing R&M design might be acceptable. (Please see attachment page 6, question 9, for a discussion of the difference),

Eliminating the sheetpile bulkhead and the Approach Dock (Elevated Loading Ramp) while downsizing mooring dolphins (thus eliminating Handymax ore ship as a design vessel) could be done with minimal engineering modifications and at considerable savings. Catwalks and dolphins provide secure moorage for fuel and freight barges, and adequate uplands are retained for storage and maneuvering. The AML ro-ro provides for freight delivery. There is no need for a 700 ft. long dock face or sheetpile bulkhead.

Rather than being swept along by the dictates of the previous administration and assembly, please act immediately to provide an appropriately sized option for Lutak Dock.

Eric Holle

<https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/ser/f0003482-alternative-analyfaq-a11y.pdf>

[From page 6 + 7:](#)

[Question 9 - What is the difference between an alternative and a design option \(or variation\)?](#)

[As noted under Question 4, one of the primary purposes of both CEQA and NEPA is to identify, through the evaluation of project alternatives, ways in which the environmental effects of a project can be avoided or minimized while still satisfying the primary objectives of the project. In general, an alternative will have a greater potential to either significantly increase or lessen the environmental effects of a project when compared to a design option or variation. For example, a slight modification in a roadway alignment to avoid a small area of wetland habitat is more likely to be a design modification rather than an alternative. However, a substantial shift in an alignment to avoid what could be a significant impact to wetlands would probably be considered an alternative. A high occupancy vehicle \(HOV\) lane project is another example in](#)

which the difference between an alternative and a design option is tied to the potential to increase or lessen the environmental effects of the project. Although a general purpose lane and an HOV lane would occupy the same physical space, each would be expected to have substantially different effects to air quality as an HOV lane will generally result in less traffic volume and higher speeds than a general purpose lane, and each will have different effects on traffic volume and speed in the other travel lanes. Smaller changes to the project, such as different operating hours for the HOV lane, would probably result in lesser overall effects to air quality, making this a design option instead. An intersection improvement project provides a final example. While an at-grade intersection and a grade-separated interchange represent two different project alternatives, the specific configurations of the interchange (diamond, partial cloverleaf, full cloverleaf, etc.) may represent design options or variations as they are less likely to substantially alter the overall environmental effects of the project.