



referred to in the same manner as other evidence actually bound into the transcript.

Respectfully submitted,



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per hour for the first two hours would attempt to cross this bridge. Even assuming that the bridge was open to permit passage of boat traffic 50 minutes of each hour, evacuation traffic could still use it for 10 minutes each hour. The available vehicular capacity is then 240 vehicles per hour, (1/6 hour x 1,440 vph), far in excess of the demand of 156 vph. Thus, even under this highly unlikely scenario, these evacuees would not experience delay that would extend the ETE: any queue that developed as a result of the bridge opening would quickly discharge when it closed.

If the Gillis Bridge remained open due to mechanical trouble or due to some other unforeseen event during an evacuation, such that it substantially delayed evacuation traffic, the emergency response would be similar to that applied to other traffic impediments. The situation (bridge open) and resulting traffic backup would be reported to the Staging Area by the Traffic Guide at TCP B-SA-08 which is located on Route 1 just north of the bridge. (The TCP diagram for B-SA-08 is Attachment G hereto.) As with any traffic impediment, this situation would be evaluated at the Staging Area and EOC. A potential reroute of evacuation traffic for this situation would have the Traffic Guide at TCP B-SA-08 direct all traffic northbound on Route 1 away from the bridge. This traffic would proceed north to School Street where the Traffic Guide at TCP B-SA-06 would direct it

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CERTIFICATE OF SERVICE

I, Thomas G. Dignan, one of the attorneys for the Applicants herein, hereby certify that on August 22, 1989, I made service of the within document by depositing copies thereof with Federal Express, prepaid, for delivery to (or, where indicated, by depositing in the United States mail, first class postage paid, addressed to):

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