UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

March 28, 2007

Mr. Jerome Wiggins, Program Specialist
Office of Planning and Programming
Federal Transit Administration, Region IX
201 Mission Street, Suite 1650
San Francisco, CA 94105

Subject: Supplemental Draft Environmental Impact Statement for the South Sacramento Corridor Phase 2 Project, Sacramento, California (CEQ #20070049)

Dear Mr. Wiggins:

The Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act. Our detailed comments are enclosed.

EPA is highly supportive of the project goals to reduce vehicle miles traveled, reduce vehicle emissions, and provide expanded transportation choices. We look forward to the successful implementation of this project. While we have not identified environmental impacts requiring substantive changes to the document, we have identified areas where more information is requested. In addition, EPA strongly encourages the project proponents to implement one of the parking garage options discussed in the Supplemental Draft Environmental Impact Statement (SDEIS). EPA has rated this document LO, *Lack of Objections*. Please see the attached *Rating Factors* for a description of our rating system.

EPA commends the Sacramento Regional Transit District's work with communities in the vicinity of the proposed light rail extension. The Transit for Livable Communities Program, combined with efforts by local jurisdictions, such as the City of Sacramento to encourage transit oriented development, help to minimize the adverse environmental impacts of growth and development pressure.

We appreciate the opportunity to review this SDEIS. When the Supplemental Final EIS is released for public review, please send two copies to the address above (mail code: CED-2). If you have any questions, please contact Connell Dunning of my staff at 415-947-4161 or dunning.connell@epa.gov.

Sincerely,

Connell Dunning

for Nova Blazej, Manager
Environmental Review Office

Enclosures:
EPA's Detailed Comments

cc: Ms. Diane Nakano, Sacramento Regional Transit District

EPA DETAILED COMMENTS ON THE SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE SOUTH SACRAMENTO CORRIDOR PHASE 2 PROJECT, MARCH 28, 2007

Coordinated Transit and Land Use Planning

The Environmental Protection Agency (EPA) commends the Sacramento Regional Transit District (RT) for its commitment to the Transit for Livable Communities Program. Working with local jurisdictions to encourage transit oriented development (TOD) around transit stations can help the region to accommodate growth pressure by providing necessary housing and services to the community, while also minimizing the conversion of critical habitat areas and farmland to new development. TOD can also better utilize the transit investment, by increasing ridership and decreasing the number of riders who must drive to transit stations, minimizing the need to provide parking as well as impacts on air quality. EPA especially supports such actions as the City of Sacramento City Council's Light Rail Station Ordinance and denial of large floor plate, auto-oriented uses proposed for areas adjacent to transit stations.

Recommendation:

- RT should continue to coordinate with local jurisdictions to encourage TOD and discourage auto-oriented uses near transit stations.

Air Quality

EPA commends RT on its commitment to improving air quality through improved transit service, the use of buses powered by compressed natural gas, and measures to reduce diesel emissions from construction equipment. EPA recommends including a discussion of the new 8-hour ozone and $PM_{2.5}$ standards in the Supplemental Final Environmental Impact Statement (SFEIS). The document should also identify sensitive receptors in the project area. Finally, the Construction Phase Impacts section should include a discussion of traffic congestion related to project construction and how any impacts will be mitigated.

Recommendations:

- The SFEIS should discuss the difference between the 1-hour and 8-hour ozone standards, and discuss the absence of monitoring data for $PM_{2.5}$.
- The SFEIS should identify sensitive receptor locations in the project area, such as schools, hospitals, parks, and athletic centers. Schedule construction to minimize impacts in these areas.
- The Construction Phase Impacts section should include a discussion of how traffic congestion related to project construction can contribute to increased levels of carbon monoxide, especially at already congested intersections.

Design Options

EPA recommends that RT minimize the amount of surface parking constructed for the project, particularly at the Consumnes River College Station. The increase in impervious surface resulting from surface parking may have adverse impacts on water quality and the quantity of groundwater recharge, and increase flood hazards.

Recommendations:

- RT should select one of the parking garage options, rather than the surface parking, at the Consumnes River College Station. RT should implement measures to reduce vehicle miles traveled, such as charging for parking at all stations.
- Where surface parking is built as part of the project, EPA recommends the use of "green" or porous pavement to lessen the negative impacts on water. Where possible, integrate bioswales into drainage improvements.

Water Quality

The SFEIS should include additional information with regard to water quality in Morrison Creek. Morrison Creek is listed as impaired under the Total Maximum Daily Load (TMDL) Program established under Section 303(d) of the Clean Water Act.

Recommendations:

- The SFEIS should describe direct, indirect, and cumulative impacts that the project may have on Morrison Creek.
- The SFEIS should describe any existing restoration and enhancement efforts in local waterways, how the proposed project will coordinate with on-going protection efforts, and additional mitigation measures that may be required.

Cumulative Impacts

The various sections of the Cumulative Impacts analysis do not discuss all of the projects in the vicinity of the project area. For example, the Biological Resources section only discusses impacts from Phases 1 and 2 of the South Sacramento Corridor, and not from any of the other projects listed as "Related Projects." All known impacts of the "Related Projects" should be included in the SFEIS, as well as any known mitigation for those impacts. If impacts are unknown or there will be no impacts, these facts should be stated.

Recommendation:

- Include analysis of all related projects in all sections of the Cumulative Impacts analysis. If specific quantitative information is not available, state this fact, but disclose whether there will be an impact.

Noise and Vibration

The document references the Federal Transit Administration guidance manual *Transit Noise and Vibration Impact Assessment* (April 1995). An updated version of this document was published in May 2006 and is available online at http://www.fta.dot.gov/documents/FTA_Noise_and_Vibration_Manual.pdf.

Recommendation:

- Review the updated guidance document to insure that analyses included in the SFEIS are based on the most current analysis standards.