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

April 11, 2011

Melanie Brent
California Department of Transportation
District 4, Office of Environmental Analysis
111 Grand Avenue
Oakland, California 94623

Subject: Draft Environmental Impact Statement for the Yerba Buena Island Ramps Improvement Project, San Francisco County, California (CEQ #20110044)

Dear Ms. Brent:

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. We have rated this Draft Environmental Impact Statement (DEIS) as LO, *Lack of Objections*. Please see the enclosed *Summary of EPA Rating Definitions* for a description of our rating system.

While we have a lack of objections to the proposed project, there are a few items that EPA recommends be clarified in the Final Environmental Impact Statement (FEIS):

- The air quality chapter should be updated to include the most recent available information, including monitoring data. Ensure that analyses are based on the most current data.
- The DEIS states that the project is not considered a Project of Air Quality Concern (POAQC), which determines whether a $PM_{2.5}$ hot spot analysis is required. Caltrans must consult with the regional Air Quality Conformity Task Force to receive concurrence from the relevant agencies on the conclusion that the project is not a POAQC. This consultation and determination should be discussed in the FEIS.
- The DEIS references EPA's 2006 guidance for qualitative particulate matter (PM) hot spot analysis. EPA's final guidance document, *Transportation Conformity Guidance for Quantitative Hot-spot Analyses in PM2.5 and PM10 Nonattainment and Maintenance Areas*, was released in December 2010 and is available at http://www.epa.gov/otaq/stateresources/transconf/policy.htm#project. EPA published a Federal Register notice on December 20, 2010, which initiated a two-year grace period for transitioning from qualitative to quantitative analysis procedures.

- EPA recommends that Caltrans complete consultation with the State Historic Preservation Officer and execute a programmatic agreement prior to publication of the FEIS, and include all mitigation commitments in the record of decision (ROD).
- Given the fact that stormwater runoff from the project site flows directly into the San Francisco Bay, EPA recommends that Caltrans implement aggressive best management practices (BMPs) to control and treat stormwater during construction and operation of the facility, and monitoring to ensure effectiveness of the BMPs. Commitment to these BMPs should be included in the FEIS.

We appreciate the opportunity to review this DEIS. When the FEIS is released for public review, please send one hard copy and one electronic copy to the address above (mail code: CED-2). If you have any questions, please contact Carolyn Mulvihill, the lead reviewer for this project, at 415-947-3554 or mulvihill.carolyn@epa.gov.

Sincerely,

Connell Dunning, Transportation Team Supervisor
Environmental Review Office

Enclosure: Summary of EPA Rating Definitions

cc: Eric Cordoba, San Francisco County Transportation Authority
Brendan Thompson, Regional Water Quality Control Board
Andrea Meier, Army Corps of Engineers