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

June 20, 2011

Melanie Brent
California Department of Transportation District 4
111 Grand Avenue
P.O. Box 23660
Oakland, CA 94623-0660

Subject: Final Environmental Impact Statement for the Jepson Parkway Project, Solano County, California (CEQ #20110152)

Dear Ms. Brent:

The U.S. 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. EPA has previously provided feedback on this project through the *National Environmental Policy Act/Clean Water Act Section 404 Integration Process Memorandum of Understanding* (NEPA/404 MOU).

EPA reviewed the Draft Environmental Impact Statement (DEIS) and provided comments to the California Department of Transportation (Caltrans) on July 18, 2008. We rated the DEIS as *Environmental Concerns, Insufficient Information* (EC-2) due to concerns about impacts to wetlands and waters of the United States, growth inducement, and air quality, and requested that the Final Environmental Impact Statement (FEIS) include more information about those impacts and about selection of the preferred alternative.

In our July 20, 2009 letter, we agreed with Caltrans' selection of Alternative B as the preliminary least environmentally damaging practicable alternative (LEDPA), the only alternative that can be permitted pursuant to Clean Water Act Section 404 Guidelines, and with the conceptual mitigation plan. We encourage Caltrans to continue efforts to minimize impacts to aquatic resources, and other environmental resources, through project design modifications where possible. We continue to be available to discuss mitigation options with Caltrans as a final mitigation plan is developed.

EPA commends Caltrans for including multimodal features in the project, including bicycle and pedestrian amenities.

We also commend Caltrans for providing an analysis of potential mobile sources air toxics (MSAT) impacts, including potential increases in vehicle miles traveled along the project corridor and identification of areas where the new roadway would be closer to existing development. This information serves as the basis for better understanding potential near-roadway impacts and health concerns associated with roadway expansion projects. While we recognize the additional analysis that was performed in response to our comments on the DEIS, we have additional recommendations for future MSAT analysis of proposed Caltrans projects where appropriate:

- Inclusion of modeled MSAT concentrations for future no-build and build alternatives;
- Comparison of these modeled concentrations with existing concentrations;
- Comparison of the scale of emissions reduction resulting from EPA pollutant control programs and potential increased emissions resulting from project alternatives; and
- Consideration of design changes to avoid MSAT increases, which may have major benefits beyond what will be accomplished by EPA programs.

The above additional analyses are important for determining whether or not a project will result in MSAT impacts. We continue to be available to discuss appropriate methodologies for analyzing potential MSAT impacts of Caltrans projects.

We appreciate the opportunity to review this FEIS. When the ROD is signed, please send one copy to the address above (mail code: CED-2). If you have any questions, please contact Carolyn Mulvihill of my staff at 415-947-3554 or mulvihill.carolyn@epa.gov or Melissa Scianni of EPA's Wetlands Regulatory Office at 415-972-3821 or scianni.melissa@epa.gov.

Sincerely,

Connell Dunning

Connell Dunning, Transportation Team Supervisor
Environmental Review Office

cc: Jane M. Hicks, Army Corps of Engineers
Janet Adams, Solano Transportation Authority
Michelle Tovar, U.S. Fish and Wildlife Service
Doug Hampton, NOAA Fisheries