Reading file

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

December 1, 2008

Gene Fong
Division Administrator
Federal Highway Administration
650 Capitol Mall, Suite 4-100
Sacramento, CA 95814

Subject: Final Environmental Impact Statement (FEIS) for Doyle Drive Project – South Access to the Golden Gate Bridge, San Francisco, CA (CEQ # 20080438)

Dear Mr. Fong:

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 provided comments on the Draft Environmental Impact Statement (DEIS) on March 1, 2006 and rated the DEIS as Environmental Concerns – Insufficient Information (EC-2) (see attached "Summary of EPA Rating System"). Given the project's location within the Presidio and its proximity to the Golden Gate National Recreation Area, cultural institutions, and residential areas, we encouraged the Federal Highway Administration (FHWA) to avoid and minimize potential adverse impacts to historic resources and traffic in neighboring communities. In addition, we had concerns about the potential human health impacts from construction-related emissions. We recommended that FHWA avoid and minimize these impacts to the maximum extent possible, and commit to specific mitigation measures in the FEIS and Record of Decision (ROD).

EPA recognizes the importance of addressing the seismic, safety, and structural improvement needs for Doyle Drive and appreciates the efforts of FHWA, the California Department of Transportation (Caltrans) and its consultants to respond to our comments on the DEIS. We are pleased to note that the FEIS includes a more detailed discussion of mitigation measures and design guidelines to minimize potential impacts on cultural and historic resources. We were also pleased to see a detailed discussion of the Section 106 consultation process and an executed Programmatic Agreement (PA) to address and mitigate the effects of the project on National Register of Historic Places (NRHP)-eligible properties. We recommend that these measures be adopted in the ROD.

Based on our review of the FEIS, EPA continues to have concerns about 1) the traffic impacts due to construction activities, as well as 2) the localized air quality impacts due to the scale and duration of construction activities. While we were pleased at the inclusion of a Draft Transportation Management Plan (TMP), we reiterate our recommendation that a clear

commitment be included as part of the FEIS and ROD to consult with local residents, businesses, and other affected users (including bicyclists and pedestrians) of the Presidio and Golden Gate National Recreation Area before the TMP is finalized. In addition to the necessary rerouting of transit service during project construction, we recommend that the TMP consider methods to further increase the capacity of transit to offset construction-related congestion.

We also were pleased to note that the FEIS includes several potential mitigation measures to reduce construction emissions, as well as reference to the Bay Area Air Quality Management District's (BAAQMD) guidelines and future EPA requirements with which the project must comply. EPA commends FHWA for incorporating multiple measures to reduce the air quality impacts expected to result from future construction associated with this project. In light of the serious health impacts associated with $PM_{2.5}$ (fine particulate matter) and diesel exhaust exposure, we recommend that the best available control measures for these pollutants be implemented at all times and reiterate our previous comment to incorporate a Construction Emissions Mitigation Plan into the ROD. We recommend that all construction mitigation measures listed in the FEIS, all requirements under BAAQMD Guidelines (BAAQMD, 1999), and the following additional measures be incorporated into a Construction Emissions Mitigation Plan, where feasible and appropriate, in order to reduce impacts associated with fugitive dust and emissions of $PM_{2.5}$, diesel exhaust, and mobile source air toxics from construction-related activities:

Fugitive Dust Source Controls:

- Install wind fencing and phase grading operations where appropriate, and operate water trucks for stabilization of surfaces under windy conditions.
- When hauling material and operating non-earthmoving equipment, prevent spillage and limit speeds to 15 miles per hour (mph). Limit speed of earth-moving equipment to 10 mph.

Mobile and Stationary Source Controls:

- Minimize use, trips, and unnecessary idling of heavy equipment.
- Maintain and tune engines per manufacturer's specifications to perform at EPA certification levels, where applicable, and to perform at verified standards applicable to retrofit technologies. Employ periodic, unscheduled inspections to limit unnecessary idling and to ensure that construction equipment is properly maintained, tuned, and modified consistent with established specifications. The California Air Resources Board has a number of mobile source anti-idling requirements which could be employed. See their website at: http://www.arb.ca.gov/msprog/truck-idling/truck-idling.htm
- Prohibit any tampering with engines and require continuing adherence to manufacturer's recommendations.
- If practicable, lease new, clean equipment meeting the most stringent of applicable Federal or State Standards. In general, commit to the best available emissions control technology. Tier 4 engines will be available in the 2009-model year and should be used for project construction equipment to the maximum extent feasible. Lacking availability of non-road construction equipment that

meets Tier 4 engine standards, FHWA/Caltrans should commit to using the best available emissions control technologies on all equipment.

- Utilize EPA-registered particulate traps and other appropriate controls where suitable to reduce emissions of diesel particulate matter and other pollutants at the construction site.

Administrative controls:

- Specify the means by which impacts to sensitive receptors, such as children, elderly, infirm and others identified in the FEIS, will be minimized. For example, locate construction equipment and staging zones away from sensitive receptors and fresh air intakes to buildings and air conditioners.
- Identify where implementation of mitigation measures is rejected based on economic infeasibility.
- Prepare an inventory of all equipment prior to construction and identify the suitability of add-on emission controls for each piece of equipment before groundbreaking. (Suitability of control devices is based on: whether there is reduced normal availability of the construction equipment due to increased downtime and/or power output, whether there may be significant damage caused to the construction equipment engine, or whether there may be a significant risk to nearby workers or the public.) Meet EPA diesel fuel requirements for off-road and on-highway, and, where appropriate, use alternative fuels such as natural gas and electric.

We appreciate the opportunity to review this FEIS for the Doyle Drive Project. When the ROD is signed, please send one copy to the address above (mail code: CED-2). If you have any questions, please contact me at (415) 972-3521, or Tom Plenys of my staff at 415-972-3238 or plenys.thomas@epa.gov.

Sincerely,

Kathleen M. Goforth, Manager
Environmental Review Office (CED-2)

Enclosure: Summary of Rating Definitions

cc: Leroy L. Saage, San Francisco County Transportation Authority
Jared D. Goldfine, Caltrans
Brian O'Neill, National Park Service
Craig Middleton, The Presidio Trust
James Metcalf, U.S. Department of Veterans Affairs