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

April 29, 2013

Kelly Hobbs
Senior Environmental Planner
California Department of Transportation
855 M Street, Suite 200
Fresno, CA 93721

Subject: Final Tier 1 Environmental Impact Statement for the State Route 180 Westside Expressway Route Adoption Study (CEQ #20130063)

Dear Ms. Hobbs:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document. Our enclosed detailed comments were prepared pursuant to the NEPA, Council on Environmental Quality regulations (40 CFR Parts 1500-1508) and our NEPA review authority under Section 309 of the Clean Air Act. The State of California has assumed responsibilities under NEPA for this project pursuant to the Memorandum of Understanding between the Federal Highway Administration (FHWA) and the California Department of Transportation (Caltrans) Concerning the State of California's Participation in the Surface Transportation Project Delivery Pilot Program.

As described in the Final Programmatic (Tier 1) Environmental Impact Statement (PEIS), this project identifies a corridor for the future expansion and/or relocation of State Route (SR) 180 in order to provide a reliable east-west connection between Fresno and Interstate 5. Currently, SR 180 terminates in the city of Mendota, approximately 18 miles from Interstate 5. Three alternatives were evaluated, including expansion of existing SR 180 (Alternative 1) and relocation of SR 180 to the north (Alternatives 2 and 3). The Final PEIS identifies the Preferred Alternative as a modified Alternative 1, which includes several design variations to avoid impacts to communities and sensitive biological resources.

EPA reviewed the Draft PEIS for this project and provided comments to Caltrans in our letter of May 31, 2011. We rated the project Environmental Objections-Insufficient Information (EO-2). The basis for this rating was: (1) extensive impacts to aquatic resources; (2) insufficient analysis of indirect and cumulative impacts of the expressway to resources of concern; and (3) impacts to agriculture as a result of farmland fragmentation. We provided further project feedback during agency coordination meetings and field visits in June 2011 and November 2011. We appreciate the changes made to the document and additional mitigation measures which have been committed to in the Final PEIS, as well as the additional analyses of indirect and cumulative effects to wetlands and other waters, farmland, and natural communities. Based upon the information presented in the Final PEIS, EPA's concerns with the Tier 1 route adoption have been addressed. We note that additional coordination between Caltrans and EPA will be necessary during preparation of future Tier 2 documents in order to address the more detailed environmental impact information available when conducting project level analyses.

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We commend Caltrans for working with the public and resource agencies to identify a Preferred Alternative that best addresses community concerns while also protecting prime farmland, aquatic resource function, and natural community connectivity. We are particularly encouraged to see a commitment in the Final PEIS to elevate the future roadway on viaduct through sensitive habitat areas. We believe that this modified alternative is likely to provide for the greatest environmental benefit, while also uniquely addressing concerns that were raised during the public and agency outreach effort. Potential environmental benefits of this alternative include 1) removal of the existing roadway which acts as a barrier between reserve lands to the north and south; 2) reconnection of historic sloughs and seasonal waterways; 3) improved sheet flow between north and south reserve areas; 4) enhanced genetic exchange of vernal pool species; 5) improved connectivity between sides of the roadway to allow safe migration of species; and 6) reduced incidence of wildlife/vehicle collision. This alternative also avoids the additional fragmentation of natural habitats and prime farmland that would have been caused through the creation on an entirely new expressway corridor to the north. As such, we are supportive of the recommendation by Caltrans staff that this modified Alternative 1, with variations 1A and 1B, and including a viaduct that would span and avoid effects to the Alkali Sink Ecological Reserve, proposed Alkali Sink Conservation Bank, and Kerman Ecological Reserve, be designated the Preferred Alternative. Additionally, we concur that this Preferred Alternative (as shown in attached figure) is the corridor most likely to contain the least environmentally damaging practicable alternative (LEDPA) during Tier 2 project analyses. The extensive coordination which led to development of the Preferred Alternative/LEDPA, and mitigation measures committed to in the Final PEIS, should be clearly documented in the project Record of Decision (ROD). Should any future Tier 2 environmental document prescribe an alignment which falls outside of the corridor shown in the attached figure, the "most likely to contain" the LEDPA determination as described in this letter will need to be revisited.

We appreciate the opportunity to review this Final PEIS and look forward to working with Caltrans during Tier 2 analyses of the SR 180 Westside Expressway to further avoid potential environmental impacts of future projects. We understand Caltrans plans to initiate the NEPA/Clean Water Act Section 404 (CWA 404) Integration Process at that time, and we encourage Caltrans to begin coordination with EPA and the Army Corps of Engineers as early as possible in order to ensure all CWA 404 permit requirements are addressed. If you have any questions, please contact Clifton Meek, the lead reviewer for this project, at 415-972-3370 or meek.clifton@epa.gov.

Sincerely,

Connell Dunning

Connell Dunning, Transportation Team Supervisor
Environmental Review Office
Communities and Ecosystems Division

Cc via email: Bob Pavlik, California Department of Transportation
Leah Fisher, U.S. Army Corps of Engineers
Jen Schofield, U.S. Fish and Wildlife Service
Laura Peterson Diaz, California Department of Fish and Game

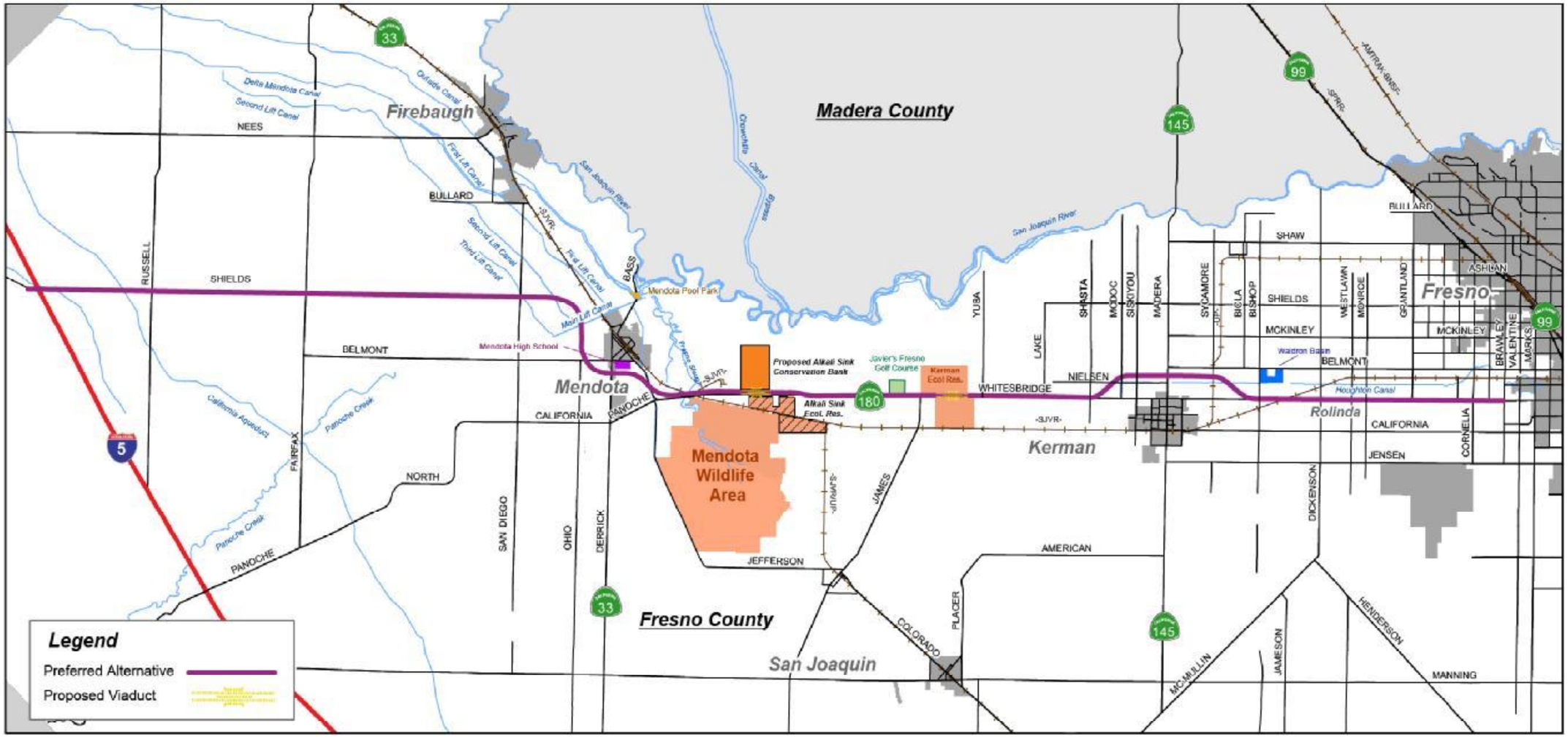


**Figure 2-5 Preferred Alternative**