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

July 17, 2013

Mr. Alexander Smith
Federal Transit Administration, Region IX
201 Mission Street, Suite 1650
San Francisco, CA 94105

Subject: Supplemental Draft Environmental Impact Statement for the Mid-Coast Corridor Transit Project, San Diego, California (CEQ #20130125)

Dear Mr. Smith:

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 commend the Federal Transit Administration (FTA) and the San Diego Association of Governments (SANDAG) for seeking to improve transit service in the Mid-Coast Corridor. We hope that as indicated in the document, if constructed, these improvements will increase transit ridership, decrease automobile congestion, and lead to air quality improvements.

We reviewed the Draft Environmental Impact Statement (DEIS) for the previous version of this project and provided comments on May 8, 1995, and reviewed the Final Environmental Impact Statement (FEIS) and provided comments on August 13, 2001. The FEIS resolved the concerns that we had identified following our review of the previous DEIS. We understand that the project has changed since the initial environmental documents were prepared, and that a significant amount of alternatives analysis was conducted prior to the preparation of this document, including consideration of a variety of modes (bus rapid transit, light rail transit, commuter rail transit, etc).

We have rated this Supplemental Draft Environmental Impact Statement (SDEIS) as LO, *Lack of Objections*. Please see the attached *Rating Factors* for a description of our rating system. We have a few recommendations and comments below.

Wetland/Waters Impacts

We are pleased to hear that SANDAG has been coordinating with the U.S. Army Corps of Engineers (Corps) and San Diego Regional Water Quality Control Board (SDRWQCB)

regarding impacts to wetlands and waters. We are also pleased that the open channel design for Rose Creek below SR-52 was developed based on feedback from resource agencies. We commend SANDAG for proposing a 3:1 mitigation ratio for permanent impacts to jurisdictional wetlands and waters and for exploring mitigation site options. We encourage SANDAG to continue efforts to minimize impacts during future design and construction. Please document any additional coordination with the Corps and SDRWCQB regarding impacts and mitigation in the Supplemental FEIS.

We also commend SANDAG for including best management practices (BMPs) as part of the project design to reduce the amount of contaminants added to 303(d) listed waters and to eliminate potential increases in surface runoff that could otherwise impact downstream facilities. We recommend that SANDAG also minimize the addition of surface parking where feasible to reduce potential water quality impacts.

Air Quality

The SDEIS notes that construction activities would result in emissions of nitrogen oxides (NO_x), total organic gases (TOG), and carbon dioxide (CO_2) that exceed San Diego County Air Pollution Control District (SDAPCD) and South Coast Air Quality Management District (SCAQMD) significance thresholds during some years of construction. EPA encourages SANDAG to 1) consult with SDAPCD to identify the most stringent BMPs for minimizing construction emissions and potential associated health impacts, and 2) require contractors to implement all measures to minimize emissions where possible. This is particularly important should the construction schedule of this project happen concurrently with other construction in the area.

Construction Noise

We commend SANDAG for noting that the project specification would require contractors to take all feasible and reasonable measures to reduce any construction noise during nighttime hours. Considering the amount of nighttime construction that will be required, we encourage SANDAG to commit to the implementation of mitigation measures for reducing all significant construction noise impacts, including the mitigation and project measures discussed in the SDEIS.

Multimodal Improvements

We commend SANDAG for the proposed improvements to bicycle and pedestrian infrastructure around station areas. We encourage efforts to facilitate multimodal access to stations, including minimizing surface parking where feasible and making station areas bicycle and pedestrian-friendly. We also encourage SANDAG to continue to work with the City of San Diego to encourage transit-supportive development and streetscape improvements in areas surrounding stations.

We appreciate the opportunity to review the SDEIS. When the Supplemental FEIS is released for public review, please send one CD 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

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

Enclosures: Summary of EPA Rating Definitions

cc: Leslie Blanda, SANDAG
Robert Reider, SDAPCD