

US EPA ARCHIVE DOCUMENT



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

December 14, 2007

Melanie Brent  
Office of Environmental Analysis  
Caltrans District 4  
111 Grand Avenue  
P.O. Box 23660  
Oakland, CA 94623-0660

Subject: Draft Environmental Impact Statement/Environmental Impact Report for the Marin-Sonoma Narrows HOV Widening Project, Marin and Sonoma Counties, California (CEQ # 20070447)

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, 2006* (NEPA/404 MOU). Based on our review, we have rated the Draft Environmental Impact Statement (DEIS) for the proposed project as Environmental Concerns – Adequate Information (EC-1). Please see the enclosed “Summary of EPA Ratings.”

We note that the DEIS provides a thorough and user-friendly description of the project and its environmental impacts. We commend Caltrans on avoiding and minimizing impacts to wetlands and other resources through the alternative development process. However, we encourage further efforts to avoid and minimize potential adverse impacts, to the greatest extent practicable, to sensitive biological, farmland, community, and cultural resources through the remaining planning and design process and future construction. Specifically, any project design modifications that would further avoid existing trees and result in fewer impacts to wetlands should be identified in the Final EIS.

While the impacts projected for the two build alternatives do not differ significantly, EPA believes that the Fixed HOV Lane Alternative would best meet the purpose and need of the project. Traffic projections for 2010 indicate bottlenecks and delays in the southbound direction during both AM and PM peak periods, and 2030 projections indicate bottlenecks and delays in both directions during both peak periods. Therefore, having HOV lanes

available in both directions during both peak periods would be prudent. The fixed HOV lanes would also be available to mixed flow traffic during off-peak periods, providing more efficient movement of vehicles throughout the day. In choosing between the four access options, and as more detailed information on amounts of impacts becomes available, we encourage Caltrans to choose the option that will minimize impacts to wetlands and other environmental resources.

EPA is also supportive of the inclusion of bicycle and pedestrian infrastructure in the project, as it is consistent with various transportation plans for the area. In addition, encouraging alternative transportation options to automobiles will lessen the impacts to air quality and other resources from automobile use.

We appreciate the opportunity to review this DEIS and look forward to future coordination on the project. The next steps in the NEPA/404 MOU process are agreement on the Least Environmentally Damaging Practicable Alternative (LEDPA), the only alternative that is permissible pursuant to the Clean Water Act (CWA) Section 404(b)(1) Guidelines, and 2) the conceptual mitigation plan. When the Final EIS is released for public review, please send two copies to the address above (mail code: CED-2). If you have any questions, please contact Michael Monroe of EPA's Wetlands Regulatory Office at 415-972-3453 or [monroe.michael@epa.gov](mailto:monroe.michael@epa.gov), or Carolyn Mulvihill of my staff at 415-947-3554 or [mulvihill.carolyn@epa.gov](mailto:mulvihill.carolyn@epa.gov).

Sincerely,

/s/ Connell Dunning

Nova Blazej, Manager  
Environmental Review Office

Enclosure:  
Summary of EPA Rating Definitions

cc. Cesar Perez, Federal Highway Administration  
Joyce Ambrosius, NOAA Fisheries  
Jane M. Hicks, U.S. Army Corps of Engineers  
Ryan Olah, U.S. Fish and Wildlife Service  
Brendan Thompson, Regional Water Quality Control Board