

Appendix L Responses to Comments

Appendix L Responses to Comments

I-80/I-680/SR12 comments received on the Draft EIR/EIS.

Table L-1. List of Commenters

Comment Number	Commenter	Date
Agency and Individual Comment Letters		
1	Neal Johnson	08/17/10
2	Edgar V. Salire, P.E.	08/29/10
3	Lynn J. Zhang	09/07/10
4	Steven Kays	09/21/10
5	Jessica Davenport, Coastal Planner, State of California, San Francisco Bay Conservation and Development Commission	10/01/10
6	Gregor Blackburn, CFM, Branch Chief, Floodplain Management and Insurance Branch, U.S. Department of Homeland Security, FEMA	09/29/10
7	Nicole Byrd, Executive Director, Solano Land Trust	10/05/10
8	Richard Wirth, Assistant Civil Engineer, Solano Irrigation District	10/06/10
9	Justin Hopkins, E.I.T., Assistant Civil Engineer, Solano Irrigation District	10/07/10
10	John Futini	09/11/10
11	Paul Wiese, Engineering Manager, Solano County, Department of Resource Management, Public Works Engineering	10/08/10
12	Jackie Kepley	10/11/10
13	Jeff Dittmer	10/11/10
14	Dee Swanhuysen, North Bay Trail Director, Bay Area Ridge Trail Council	10/11/10
15	Andrea Meier, Sr. Regulatory Project Manager, San Francisco District, U.S. Army Corps of Engineers	10/14/10
16	Cay C. Goude, Assistant Field Supervisor, Endangered Species Program, United States Department of the Interior, Fish and Wildlife Service	10/18/10
17	George R. Hicks, Public Works Director, City of Fairfield, Public Works Department	10/11/10
18	Michael Jaeger and Bob McHugh, Jaeger McHugh & Company, LLC	10/15/10
19	Connell Dunning, Transportation Team Supervisor, Environmental Review Office, United States Environmental Protection Agency	10/18/10
20	Kim VanGundy, Fairfield-Suisun Unified School District	10/26/10
21	Brendan Thompson, Environmental Specialist, California Regional Water Quality Control Board	10/27/10
Public Meeting Comments		
22	Manoj Sahni, Comment Sheet	09/23/10
23	Woody Darnelle, SuperStore Ind. Sunnyside Farms, Comment Sheet	09/23/10
24	Lesley Brunner, HOA Green Valley Lake, Comment Sheet	09/23/10
25	Linda Mellor, Comment Sheet	09/23/10
26	Walter Permann, Oral Comment	09/23/10
27	Michelle Valine, Oral Comment	09/23/10
28	Pam Sahni, Oral Comment	09/23/10

Letter 1

nealjn@comcast.net

08/17/2010 01:33 PM

To howell_chan@dot.ca.gov
cc
Subject I-80/I-680/SR 12 interchange

Dear Sir,

I support alternative B, with the following changes in the western segment (see below):

Direct SR 12 West traffic to Red Top Road Eliminate existing partial interchange of SR 12 West with I-80 Eliminate weave to Green Valley Road ramps Alter connections with Business Center Drive and SR 12 Widen SR 12/Red Top Road to 4 lanes to new interchange with I-680 Give Red Top Road state highway status between I-80 and I-680 (possibly SR 612)

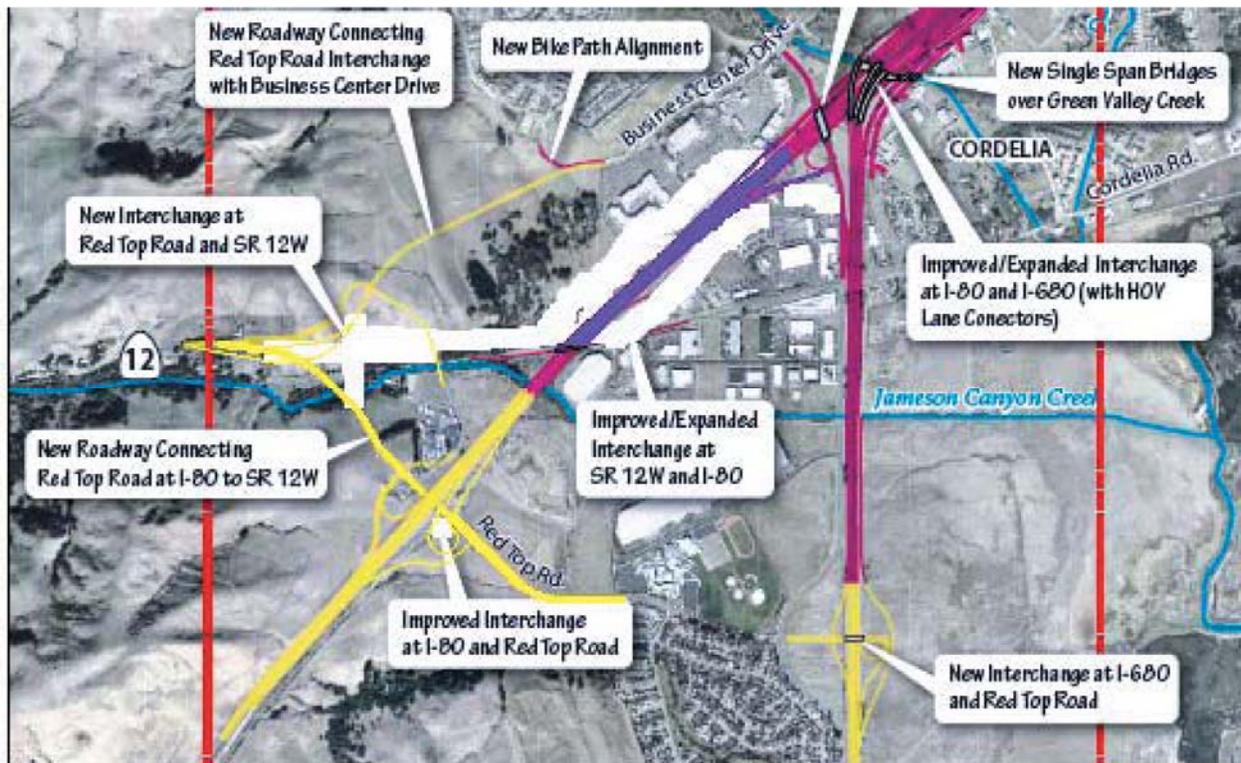
Provide loop ramp for EB SR 12 for direct access to I-80 east Provide slant ramp for WB SR 12 for direct access from I-80 west

(Embedded image moved to file: pic00267.bmp) I believe that these changes will reduce costs and provide for better traffic flow. Thank you for your consideration of these changes.

Sincerely,

Neal Johnson

1-1



Comment Letter 1, Neal Johnson, 08/17/10

Response to Comment 1-1

Commenter suggests reconfiguring the western end of Alternative B by realigning SR 12W to the south and connecting it to I-80 at a combined I-80/SR12W/Red Top Road interchange, and then improving Red Top Road between I-80 and I-680, potentially giving it a state highway designation.

It is correct to indicate that an eastbound loop on-ramp at a combined I-80/SR 12W/Red Top Road interchange would eliminate the Alternative B proposed weave between the eastbound SR 12W connector to eastbound I-80 and the eastbound I-80 off ramp to Green Valley Road.

However there are disadvantages to this suggestion as follows:

- Connecting SR 12W to I-80 at Red Top Road would result in a flat skew over the railroad tracks and over Jameson Creek, in large part due to the large radius curve necessary to meet the minimum design criteria for high speed highways and freeways. This alignment would result in significant higher cost and result in significantly greater environmental impacts than with the Alternative B alignment in the Draft EIR/EIS. The proposed SR 12W/Red Top Road/Business Center Drive interchange would be relocated from the present planned location (north of the railroad tracks and Jameson Creek) to meet this new alignment, placing the realigned interchange on top of the railroad tracks and Jameson Creek, further increasing costs and environmental impacts.
- The Department and FHWA have repeatedly opposed combining local and freeway-to-freeway movements within the same interchange unless there were no other feasible alternative. The current Alternative B is a feasible alternative with less impact and lower cost.
- With the commenter's suggested alternative revision the eastbound movement on ramp to I-80 would be a combination of the eastbound SR 12W to eastbound I-80 traffic, the eastbound SR 12W to eastbound I-80/Green Valley Road off ramp traffic and the eastbound I-80/Red Top Road on ramp traffic. The total projected 2035 PM peak hour volume of these three movements is 3,630 vehicles per hour. Due to the regional nature of SR 12W, a high percentage of those trips 5–6% is truck traffic. A loop ramp connection, even a two-lane loop ramp connection could not accommodate that volume, particularly when the ramp is metered.

Letter 2

Edgar Salire <philipizzy@yahoo.com>

08/29/2010 07:55 PM

To howell_chan@dot.ca.gov
cc
Subject Comments Draft EIR/EIS I-80/I-680/SR12

I live on Red Top Road across Rodriguez High School. I believe the proposed Red Top Road on- and off-ramps on I-80 and I-680 will result in congestion along Red Top Road and local roads, not counting the environmental pollution it may cause in the immediate area. Caltrans should exhaust other alternatives to avoid this potential problem to the residents of Red Top Road.

| 2-1
| 2-2
| 2-3

Edgar V. Salire, P.E.

Comment Letter 2, Edgar V. Salire, P.E., 08/29/10

Response to Comment 2-1

The volumes along Red Top Road increase in all future cases: No Build, Full Build (Alternatives B and C) and the respective fundable first phase projects (Alternative B, Phase 1 and Alternative C, Phase 1). Traffic would be worse on Red Top under No Build conditions in 2035 than with the project because more traffic would divert to local roadways to avoid congestion on I-80. Please refer to response to comment 12-2 for a more detailed discussion of projected traffic on Red Top Road.

Response to Comment 2-2

Traffic along Red Top Road would not increase over the No Build alternative, and therefore air quality and noise impacts would also not be increased over No Build conditions. The Draft and Final EIR/EIS present CO modeling at affected ramps and intersections, and receptors would not be exposed to pollution concentrations exceeding regulatory thresholds (see Section 3.2.6 and Table 3.2.6-3). See response to comment 2-1 above.

Response to Comment 2-3

As discussed in Section 2.5 of the Draft EIR/EIS, a total of 12 alternatives and variations were examined in initial screening stages of project development. Four alternatives were carried forward to a second level screening and two alternatives were evaluated in detail in the Draft EIR/EIS, Alternative B and Alternative C.

Letter 3

"Zhang, Lynn J." <LJZhang@SolanoCounty.com>

09/07/2010 11:28 AM

To <Howell_chan@dot.ca.gov>
cc
Subject I-80 project

Hello Howell,

Thanks for the plan to improve I-80/680 and SR 12.

I do appreciate a railway plan directly link San Francisco and Solano (i.e Caltrain, a BART station in Fairfield). It will make Solano county more accessible to the San Francisco economic center, attract more quality residents, more business, and improve the county financial well being significantly.

Thanks and have a nice day...

Lynn J. Zhang

GIS Analyst
Solano County, GIS Service
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E-mail: ljzhang@solanocounty.com

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| 3-1

| 3-2

Comment Letter 3, Lynn J. Zhang, 09/07/10

Response to Comment 3-1

Comment noted.

Response to Comment 3-2

The I-80/I-680/SR 12 Interchange Improvement project does not include rail improvements. However, AMTRAK capitol corridor provides direct rail service.

Letter 4

Steven Kays <stevenkays@earthlink.net>

09/21/2010 01:09 PM

To Howell_chan@dot.ca.gov
cc
Subject what will Be The Real 80 Interchange Result?

Dear Howell Chan,

Could you kindly answer these questions about the new I-80 interchange proposals? I look forward to working with you. Tell me how i can help get the needed changes implemented.

1. Must central Fairfield become less accessible via the new highway ramp locations? | 4-1
2. Increasing driving time to downtown Fairfield from the highway ramps, means fewer diners and shoppers coming downtown. What effect will the new ramps have on reducing downtown spending? | 4-2
3. Revitalizing central Fairfield creates more jobs. The improved economic vitality of central Fairfield will increase the tax revenue. Without this expected tax revenue, will we have to further raise taxes? | 4-3
4. When will the great designs for revitalizing West Texas Street be openly shown in public meetings? | 4-4
5. Where did the monies set aside for revitalizing West Texas Street disappear to before the recession? | 4-5
6. The city promised to start revitalizing West Texas Street by 2000. Will the city set a new deadline? Will the businesses asked to invest in central Fairfield as part of the stalled program be compensated for the city not keeping its promise to fix the area? | 4-6
7. Will downtown businesses continue paying the extra downtown business tax, after the highways take away part of their customer base? | 4-7

Can we be candid? Hope i got your attention.

Might this be resolved with team spirit? The majority agrees the I-80 interchange needs help. So let's compromise; and stop backstabbing. We look forward to working together..!

I posted these questions on FixFairfield.Blogspot.Org and the DailyRepublic's article on this topic today.

Cheers
Steven Kays
FixFairfield.Org
(Div of CBC Services, LLC)
434-8000

Comment Letter 4, Steven Kays, 09/21/10

Response to Comment 4-1

No on- or off-ramps will be relocated or removed in the central Fairfield area. Access to and from SR 12E at Beck and Pennsylvania Avenues will be improved. The project will result in no changes to the I-80/West Texas interchange. As such, the interchange project will not affect the accessibility of central Fairfield.

Response to Comment 4-2

The project will not increase driving time to downtown Fairfield from any highway. Downtown Fairfield is most easily accessible from I-80 via the West Texas interchange and from SR 12 via Pennsylvania Avenue. No improvements or changes are proposed to the West Texas interchange. A new SR 12/Pennsylvania interchange is proposed under both alternatives. Under no build conditions, the SR 12/Pennsylvania off-ramp is projected to operate at LOS D in the AM peak hours in 2015 and LOS F in the PM peak hours in 2015 and in both AM and PM peak hours in 2035. Under the first phase of Alternative B, the LOS would decrease in the AM peak hours. In all other scenarios the LOS would improve or remain the same. This indicates that access to downtown Fairfield would actually be improved by the project, particularly in the long run, as the off-ramp would operate at LOS A or B for either alternative. Additionally, as indicated in Tables 3.1.6-6 through 3.1.6-9 of the Draft EIR/EIS and updated Tables 3.1.6-6 and 3.1.6-11 of the Final EIR/EIS, both alternatives, and their fundable first phases reduce congestion, travel time, and delays and increase speeds on SR 12E.

Response to Comment 4-3

While the project purpose and need is not directly related to revitalizing central Fairfield, the project would result in benefits to the city by relieving congestion on I-80, I-680 and State Route 12. The project would improve access to and from central Fairfield by widening State Route 12 East and constructing interchanges at both Beck and Pennsylvania Avenues. This could indirectly improve the economic viability of central Fairfield. The project does not involve increases in local taxes.

Response to Comment 4-4

The project purpose and need does not involve revitalizing West Texas Street but may indirectly benefit downtown Fairfield as discussed above in response to comment 4-3.

Response to Comment 4-5

See response to comment 4-4 above.

Response to Comment 4-6

See response to comment 4-4 above.

Response to Comment 4-7

See response to comments 4-1, 4-2, and 4-3.



Letter 5

October 1, 2010

Howell Chan
Caltrans District 4
Environmental Analysis Office Chief
P.O. Box 23660, MS-8B
Oakland, CA 94623-0660

VIA EMAIL: Howell_chan@dot.ca.gov

SUBJECT: I-80/I-680/SR 12 Interchange Project; BCDC Inquiry
File Nos. MC.MC.1001.01 and SL.PH.7214.1

Dear Mr. Chan:

Thank you for the opportunity to comment on the Draft Environmental Impact Report/Environmental Impact Statement (Draft EIR/EIS) for the I-80/I-680/SR 12 Interchange Project, received in our office on August 16, 2010.

Although the Commission has not reviewed the Draft EIR/EIS, the staff comments discussed below are based on the Commission's law, the McAteer-Petris Act, the Commission's *San Francisco Bay Plan* (Bay Plan), the Suisun Marsh Preservation Act (Marsh Act), the *Suisun Marsh Protection Plan* (Marsh Plan), the Commission's federally-approved management plan for the San Francisco Bay, and the federal Coastal Zone Management Act (CZMA).

Jurisdiction. The following provides information about BCDC's jurisdiction and authority to discuss in the draft EIR. The Commission has "Bay" jurisdiction over all areas of the Bay subject to tidal action, which defines the location of the shoreline. The shoreline is located at the mean high tide line, except in marsh areas, where the shoreline is located at five feet above mean sea level. The Commission also has jurisdiction over managed wetlands, salt ponds, and the tidal portion of certain waterways, as identified in the McAteer-Petris Act. Additionally, the Commission has "shoreline band" jurisdiction over an area 100 feet wide, landward of and parallel to the shoreline.

In accordance with provisions of the McAteer-Petris Act, the Commission has designated certain areas within the 100-foot shoreline band for specific priority uses for ports, water-related industry, water-oriented recreation, airports and wildlife refuges. The Commission is authorized to grant or deny permits for development within these priority use areas based on appropriate Bay Plan development policies pertaining to the priority use.

The Marsh Act grants the Commission permitting authority in the primary management area of the Suisun Marsh, including marshes, managed wetlands, levees, waterways, and certain lowland grasslands below the ten-foot contour line. The Marsh Act also established a secondary management area of primarily upland grasslands and cultivated lands to serve as a buffer between the primary management area and developed lands outside the Marsh. Within

5-1

Howell Chan
 October 1, 2010
 Page 2

the secondary management area, local governments issue development permits pursuant to a Suisun Marsh local protection program component certified by the Commission. These permits can be appealed to the Commission.

Parts of the proposed project, specifically the elements located in the area east of I-680 from the Gold Hill Road overpass and north to Jameson Canyon Creek, fall within the secondary management area of the Suisun Marsh, which is protected by strict limitations on development, as noted in the Draft EIR/EIS. In addition, this portion of the project appears to overlap with the Gold Hills Unit of the Grizzly Island Wildlife Area, a wildlife refuge priority use area designated on Bay Plan Map 2.

5-1
 cont.

Wildlife Refuge Priority Use Area. One of the Bay Plan’s Major Plan Proposals is to maintain wildlife refuges in diked historic baylands. The Bay Plan states, “Prime wildlife refuges in diked-off areas around the Bay should be maintained and several major additions should be made to the existing refuge system.” The final EIR/EIS, should discuss whether any elements of the proposed project would be located within the wildlife priority land use area, how the proposed project is consistent with this designation, and whether approval of such improvements within the wildlife area have been approved by the California Department of Fish and Game.

5-2

Suisun Marsh Preservation Act. On page 2-22, the Draft EIR/EIS states that two project alternatives were rejected because they “would place a transportation facility within the Primary Suisun Marsh, which is prohibited by state law (the Suisun Marsh Preservation Act of 1974).” The Commission supports the decision to reject these alternatives.

5-3

Suisun Marsh Local Protection Program. As noted on page 3.1.1-13 of the Draft EIR/EIS, the Marsh Act requires Solano County to prepare and adopt a component of the Suisun Marsh local protection program (LPP) to implement the Marsh Act within the secondary management area. Please note that the Marsh Act was enacted in 1977, not 1997 as stated in the report. The Commission originally certified Solano County’s LPP component in 1982 and certified an amended LPP component in 1999.

5-4

On page 3.1.1-12, the Draft EIR/EIS cites the 2008 Solano County General Plan’s Suisun Marsh Policy Addendum. The Suisun Marsh Policy Addendum contains specific General Plan policies governing the Suisun Marsh that have been incorporated into the Solano County LPP certified by the Commission. It would be more appropriate to cite Solano County’s certified LPP component.

5-5

Transportation and Agriculture. The Draft EIR/EIS cites Policy 1(e) and Policy 1(f) of the utilities, facilities and transportation policies of the 2008 Solano County General Plan’s Suisun Marsh Policy Addendum. As noted above, the report should cite the certified LPP.

Utilities, Facilities and Transportation Policy 1(e) of the LPP states, in part, “New roadways (highways, primary and secondary roads) and rail lines that form barriers to movement of terrestrial wildlife should not be constructed in the Suisun Marsh or in adjacent uplands necessary to protect the Marsh except where such roadways and rail lines are necessary in the secondary management area for the operation of water-related industry...”

5-6

It is our understanding that the proposed project involves expansion of existing roadways in the secondary management area, rather than construction of new roadways. In that case, the following policy related to existing uses in the secondary management area would apply.

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Agricultural Policy 3 of the Solano County LPP states, "Existing non-agricultural uses...on sites within the secondary management area should be allowed to continue if they are conducted so that they will not cause adverse impacts on the Suisun Marsh. Any future change in uses of these sites should be compatible with the preservation of the Suisun Marsh and its wildlife resources."

5-6
cont.

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In the final EIR/EIS, please discuss which policies apply and whether the proposed project would be consistent with these policies.

Wildlife Habitat Management and Preservation and Water Quality. In the Solano County component of the LPP, Wildlife Habitat Management and Preservation Policy 1 states, "The diversity of habitats in the Suisun Marsh and surrounding upland areas should be preserved and enhanced wherever possible to maintain the unique wildlife resource." Wildlife Habitat Management and Preservation Policy 2 states, "The Marsh waterways, managed wetlands, tidal marshes, seasonal marshes, and lowland grasslands are critical habitats for marsh-related wildlife and are essential to the integrity of Suisun Marsh. Therefore, these habitats deserve special protection."

5-7

Water Quality Policy 3 states, "Disruption or impediments to runoff and stream flow in the Suisun Marsh watershed should not be permitted if it would result in adverse effects on the quality of water entering the Marsh." Water Quality Policy 6 states, "Riparian vegetation in the immediate Suisun Marsh watershed should be preserved due to its importance in the maintenance of water quality and its value as Marsh-related wildlife habitat. Stream modification should only be permitted if it is proved necessary to ensure the protection of life and existing structures from floods and only the minimum amount of modification necessary should be allowed."

5-8

5-9

In the final EIR/EIS, please discuss whether the proposed project would be consistent with these policies.

Sea Level Rise. On page 4-41 of the Draft EIR/EIS, the Department notes that "all state agencies that are planning to construct projects in areas vulnerable to future sea level rise were directed to consider a range of sea level rise scenarios for the years 2050 and 2100 in order to assess project vulnerability and, to the extent feasible, reduce expected risks and increase resiliency to sea level rise. However, all projects that have filed a Notice of Preparation, and/or have funds programmed for construction in the next five years (through 2013), or are routine maintenance projects as of the date of Executive Order S-13-08 may, but are not required to, consider these planning guidelines."

Although none of the project area is within the Commission's permit jurisdiction, the Suisun Marsh map in the BCDC report (attached) shows that part the area of the proposed project along SR 12 is vulnerable to a 16-inch rise in sea level and a larger part of the area is vulnerable to a 55-inch rise. Please note that the BCDC maps of vulnerable areas do not account for existing shoreline protection or creek levees, and do not include the existing or future 100-year flood zones.

5-10

The final EIR should reference existing Bay Plan safety of fills findings and policies that anticipate the need for planning associated with sea level rise. The Safety of Fills findings recognize that "Bay water levels are likely to increase in the future because of a relative rise in sea level... Relative rise in sea level is the sum of: (1) a rise in global sea level and (2) land elevation change (lifting and subsidence) around the Bay." Additionally, Policy 6 states, "local governments and special districts with responsibilities for flood protection should assure that their requirements and criteria reflect future relative sea level rise and should assure that new structures and uses attracting people are not approved in flood prone areas or in areas that will become flood prone in the future, and that structures and uses that are approvable will be built at stable elevations to assure long-term protection from flood hazards." It is likely that the proposed structures would be expected to last until at least mid-century.

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The final EIR should consider impacts of future sea level rise on several aspects of the proposed project, such as transportation and biological and cultural resources.

5-10
cont.

Thank you for your consideration of our comments. If you have any questions regarding this letter please contact me by phone at (415) 352-3660 or email jessicad@bcdca.gov.

Sincerely,

JESSICA DAVENPORT
Coastal Planner

Enc.

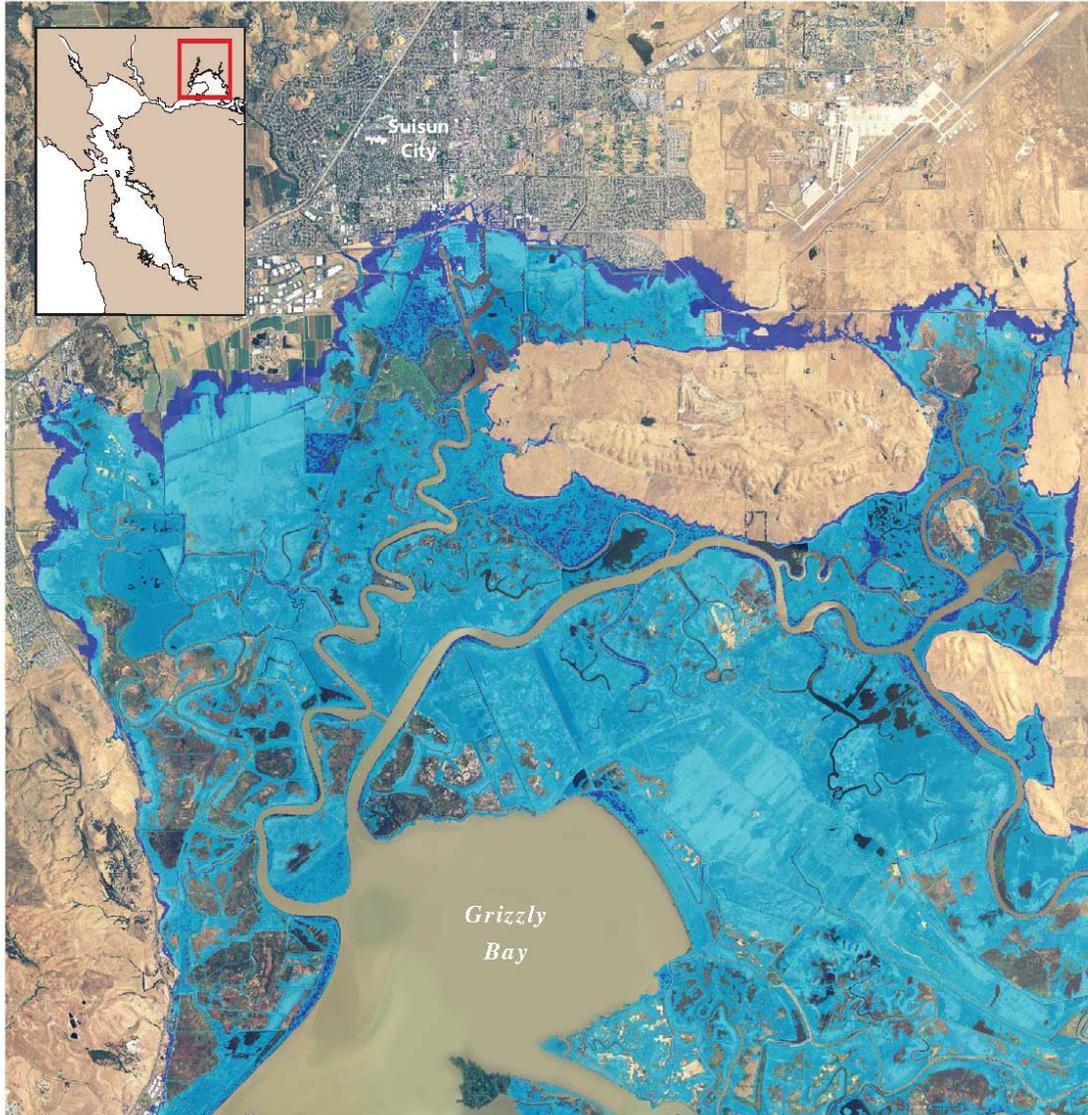
JD/gg

cc: Solano County Planning Department



SHORELINE AREAS VULNERABLE TO SEA LEVEL RISE: SUISUN MARSH

- Area vulnerable to an approximate 16 inch sea level rise
- Area vulnerable to an approximate 55 inch sea level rise



SOURCE: Inundation data from Knowles, 2008. Additional salt pond elevation data by Siegel and Bachand, 2002. Aerial imagery is NAIP 2005 data.
DISCLAIMER: Inundation data does not account for existing shoreline protection or wave activity. These maps are for informational purposes only. Users, by their use, agree to hold harmless and blameless the State of California and its representatives and its agents for any liability associated with its use in any form. The maps and data shall not be used to assess actual coastal hazards, insurance requirements, or property values or be used in lieu of Flood Insurance Rate Maps issued by the Federal Emergency Management Agency (FEMA).

Comment Letter 5, Jessica Davenport, Coastal Planner, State of California, San Francisco Bay Response to Conservation and Development Commission, 10/01/10

Response to Comment 5-1

Comment noted. The EIR/EIS acknowledges that portions of the project would be constructed within the secondary management area (see Response 5-6 below). No part of the project would be within the Gold Hills unit of the Grizzly Island Wildlife area (see Response 5-2 below).

Response to Comment 5-2

No elements of the proposed project are located within a wildlife priority land use area. The closest wildlife area to the project is the Gold Hills Unit of the Grizzly Island Wildlife Area, which is on the east side of Ramsey Road, south of Red Top Road. The wildlife area is approximately 100 feet east of the proposed construction impact area along I-680. Ramsey Road is a physical barrier between the impact area and the wildlife area, and improvements to I-680 near the wildlife area would not cross Ramsey Road. Improvements to I-680, therefore, would not affect the wildlife area; and the project would be consistent with the primary land use area designation of the wildlife area. Because the wildlife area would not contain any improvements due to the project, approval by the California Department of Fish and Game would not be necessary.

Response to Comment 5-3

Comment noted.

Response to Comment 5-4

Changed 1997 to 1977 in footnote in Section 3.1.1 of the Final EIR/EIS.

Response to Comment 5-5

The Addendum to the LPP contains the most recent and applicable policies pertaining to the project alternatives. The Addendum incorporates the original LPP (1982) and prior amendments made in 1999. Because the Addendum to the LPP is more inclusive, that document is referenced in the Draft EIR/EIS.

Response to Comment 5-6

See response to comment 5-5. The Department disagrees with the claim that Agricultural Policy 3 of the Solano County LPP would apply. This policy deals with “existing non-agricultural uses within the secondary management area.” Currently I-680 is not located within the secondary management area. Therefore portions of the project that would be constructed within the secondary management area would constitute a “new” non-agricultural use within the secondary management area. Therefore, the more applicable policy is the General Plan’s Suisun Marsh Policy Addendum’s “Utilities, Facilities, and Transportation” Policy 1(e).

Both full build alternatives would involve constructing a new interchange at I-680/Red Top Road and realigning Ramsey Road. However, these improvements would not directly or indirectly affect the primary marsh. Because the new roadway facilities would be in close proximity and

adjacent to existing I-680, the project would not form a new barrier to terrestrial wildlife movement, as it is adjacent to an existing road and does not isolate any new area.

Response to Comment 5-7

The following text has been added to Section 3.1.1 of the Final EIR/EIS.

“The County component of the Marsh Protection Plan contains several Wildlife Habitat Management and Preservation, and Water Quality policies that would pertain to the project. These include:

Wildlife Policy 1

The diversity of habitats in the Suisun Marsh and surrounding upland areas should be preserved and enhanced wherever possible to maintain the unique wildlife resource.

Wildlife Policy 2

The Marsh waterways, managed wetlands, tidal marshes, seasonal marshes, and lowland and grasslands are critical habitats for marsh-related wildlife and are essential to the integrity of the Suisun Marsh. Therefore, these habitats deserve special protection.

The project alternatives would have minimal impacts on lands within the Suisun Marsh secondary management area. Impacts of the project on waterways, wetlands, and marshes would be mitigated as described in Section 3.2.2 of the Draft EIR/EIS. These mitigation measures would require compensation for affected waterways, wetlands, and marsh areas at a 1:1 ratio to ensure no net loss of these habitats as a result of the project.”

The full-build project alternatives would primarily affect annual grassland (non-wetland) habitat within the Secondary Management Area. Two seasonal drainages that cross under I-680 enter the Secondary Management Area within the permanent impact area (see OW-150 and OW-151 on Figures 3.3-2a and 3.3-2c, Sheet 13). Although all or most of these drainages would be filled as part of the proposed project, neither of these drainages extends more than about 200 feet into the Secondary Management Area from the edge of Ramsey Road. The drainages do not connect to the Suisun Marsh and end approximately 2,000 feet west of the primary marsh boundary. Direct and indirect impacts of the project on waterways, wetlands, and marshes would be avoided, minimized, and/or mitigated as described in Section 3.3.2 of this Draft EIR/EIS. Avoidance and minimization of impacts would be accomplished through implementation of measures (in Section 3.3.1.1) to install construction barrier fencing, to conduct environmental awareness training, and for biological monitoring, and measures to protect water quality and prevent erosion. In cooperation with the RWQCB and USACE, compensation for loss of drainage habitat (in Section 3.3.2.1) would be accomplished by purchasing habitat credits at an approved mitigation bank. Compensation for impacts on waterways, wetlands, and marsh areas would be at a 1:1 ratio to ensure no net loss of these habitats as a result of the project. Therefore, the loss of seasonal drainages OW-150 and OW-151 would be compensated to ensure no net loss of seasonal drainage habitat. In addition, mitigation for the loss of annual grassland would be required as Swainson’s hawk foraging habitat as described in Section 3.3.5.8 of the Draft EIR/EIS.

Response to Comment 5-8

The following text has been added to Section 3.1.1 of the Final EIR/EIS:

“Water Quality Policy 3

Disruption or impediments to runoff and stream flow in the Suisun Marsh watershed should not be permitted if it would result in adverse effects on the quality of water entering the Marsh. Riparian vegetation in the immediate Suisun Marsh watershed should be preserved, and stream modification permitted only if it is necessary to ensure the protection of life and existing structures from floods. Only the minimum amount of modification necessary should be allowed in such cases.

Section 3.2.1 of the Draft and Final EIR/EIS describes the potential water quality impacts of the project alternatives and describes both permanent and temporary (during construction) best management practices that would be implemented to protect water quality, preserve existing vegetation, and treat stormwater runoff before entering the Suisun Marsh.”

Response to Comment 5-9

The following text has been added to Section 3.1.1 of the Final EIR/EIS:

“Water Quality Policy 6

Riparian vegetation in the immediate Suisun Marsh watershed should be preserved due to its importance in the maintenance of water quality and its value as Marsh—related wildlife habitat. Stream modification should only be permitted if it is proved necessary to ensure the protection of life and existing structures from floods and only the minimum amount of modification necessary should be allowed.

The project would not affect any riparian habitat located within the Suisun Marsh area. As all project activities occurring within the Suisun Marsh Secondary Management Area would be subject to the issuance of a Marsh Development Permit by the San Francisco Bay Conservation and Development Commission (BCDC) and all conditions attached to the permit will be implemented as part of the project, the project would be consistent with the Suisun Marsh Protection Act policies and Solano County General Plan.”

Response to Comment 5-10

One of the expected results of global climate change is a rise in existing sea levels. Although predicting future sea levels is not a precise science, the latest estimate for the San Francisco Bay Area is that the level of the San Francisco Bay could increase by as much as 139 centimeters (55.6 inches) by the year 2100 (Knowles 2009). This estimate is based on the CCSM3 global climate model’s projection of a global average surface air temperature increase of approximately 8.1 degrees Fahrenheit. As stated in the draft *Potential Inundation due to Rising Sea Levels in the San Francisco Bay Region* report prepared for the California Climate Change Center (Knowles 2009), this estimate is “relatively high,” so the resultant estimate of Bay level rise can be considered a potential high-end estimate. This is the most current estimate available at the time of this writing.

The draft *Potential Inundation due to Rising Sea Levels in the San Francisco Bay Region* report includes a large-scale map of those areas projected to be vulnerable to inundation by average

yearly high water levels under the modeled 2100 conditions. In general terms, mapping was based on the hydrodynamic modeling of the height of the lands adjoining the San Francisco Bay in conjunction with predicted bay level rise. The report does not take into account the protection provided by or the adequacy of existing levees. The mapped vulnerable areas include lands that are currently behind levees. This report and maps are available at the following web address:

<http://www.energy.ca.gov/2009publications/CEC-500-2009-023/CEC-500-2009-023-D.PDF>

It is impossible to state with certainty to what extent the project site may be directly affected by a rise in the average level of the San Francisco Bay. The following exhibits depict Alternatives C and Alternative C, Phase 1 in relation to anticipated sea-level rise (data on sea level rise is taken from USGS, BCDC 2009). Alternative C, Phase 1 would occur in areas not anticipated to be affected by sea level rise. Improvements proposed as part of Alternative C along State Route 12 east could be affected by sea level rise. As indicated in the map of sea level rise in relation to Alternative B, much of Suisun City as well as substantial portions of the City of Fairfield would also be affected by sea level rise in this area.

Addressing issues of sea level rise at the regional level is a broad-based planning activity that will be implemented by Caltrans as well as other local, regional and state agencies. For transportation infrastructure this involves long-term planning and risk management in the transportation system. As such, the 2009 California Climate Change Adaptation Strategy Report suggests that Caltrans employ the following Adaptation Strategies for projects subject to sea level rise:

- **Develop a transportation use “hot-spot” map.** Research and identify transportation “hot spots” using updated NAS and other appropriate study efforts to identify across the State where the mixture of climate change impacts, population increases, and transportation demand increases will make communities most vulnerable to climate change. Caltrans will include in the analysis how the lowest-income communities in hot spot areas will be impacted.
- **Transportation Infrastructure Assessment.** Assess existing transportation design standards as to their adequacy to withstand climate forces from sea level rise and extreme weather events beyond those considered.
- **Buffer Zone Guidelines.** Develop guidelines to establish buffer areas and setbacks to avoid risks to structures within projected “high” future sea level rise or flooding inundation zones.
- **Stormwater Quality.** Assess how climate changes could alter size and design requirements for stormwater quality best management practices (BMPs). (CNRA, 2009)

These strategies are general in nature and intended to be carried out by Caltrans during the planning and programming of transportation projects across the entire transportation network. Incorporating these strategies early into the planning and programming of transportation improvements will allow transportation planners over time to design new facilities and incorporate measures into near-term transportation projects that will avoid, reduce, and address sea level rise across the transportation network.

The Bay Plan safety of fills findings and policies while acknowledging sea level rise primarily address the safety of fills placed in the Bay. While the project would not directly place fill in the bay, all structures and roadways would be designed, engineered and constructed to address site specific geologic, soils and seismic conditions. Section 3.2.3 Geology of the EIS/EIR contains a complete assessment of current geologic, soils and seismic conditions within the project area and provides specific recommendations for the design and construction of the proposed project to address site specific conditions.

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Letter 6

U.S. Department of Homeland Security
FEMA Region IX
1111 Broadway, Suite 1200
Oakland, CA. 94607-4052



FEMA

September 29, 2010

Howell Chan, District Branch Chief
State of California
Department of Transportation
111 Grand Avenue (P. O. Box 23660)
Oakland, California 94623-0660

Dear Mr. Chan:

This is in response to your request for comments on prepared Draft Environmental Impact Report (EIR) for proposed Interstate 80/Interstate 680/State Route 12 Interchange Project.

Please review the current effective countywide Flood Insurance Rate Maps (FIRMs) for the County of Solano (Community Number 060631) and City of Fairfield (Community Number 060370), Maps revised May 4, 2009. Please note that the City of Fairfield, Solano County, California is a participant in the National Flood Insurance Program (NFIP). The minimum, basic NFIP floodplain management building requirements are described in Vol. 44 Code of Federal Regulations (44 CFR), Sections 59 through 65.

A summary of these NFIP floodplain management building requirements are as follows:

- All buildings constructed within a riverine floodplain, (i.e., Flood Zones A, AO, AH, AE, and A1 through A30 as delineated on the FIRM), must be elevated so that the lowest floor is at or above the Base Flood Elevation level in accordance with the effective Flood Insurance Rate Map.
- If the area of construction is located within a Regulatory Floodway as delineated on the FIRM, any **development** must not increase base flood elevation levels. **The term development means any man-made change to improved or unimproved real estate, including but not limited to buildings, other structures, mining, dredging, filling, grading, paving, excavation or drilling operations, and storage of equipment or materials.** A hydrologic and hydraulic analysis must be performed *prior* to the start of development, and must demonstrate that the development would not cause any rise in base flood levels. No rise is permitted within regulatory floodways.

6-1

www.fema.gov

Howell Chan, District Branch Chief
Page 2
September 29, 2010

- All buildings constructed within a coastal high hazard area, (any of the “V” Flood Zones as delineated on the FIRM), must be elevated on pilings and columns, so that the lowest horizontal structural member, (excluding the pilings and columns), is elevated to or above the base flood elevation level. In addition, the posts and pilings foundation and the structure attached thereto, is anchored to resist flotation, collapse and lateral movement due to the effects of wind and water loads acting simultaneously on all building components.
- Upon completion of any development that changes existing Special Flood Hazard Areas, the NFIP directs all participating communities to submit the appropriate hydrologic and hydraulic data to FEMA for a FIRM revision. In accordance with 44 CFR, Section 65.3, as soon as practicable, but not later than six months after such data becomes available, a community shall notify FEMA of the changes by submitting technical data for a flood map revision. To obtain copies of FEMA’s Flood Map Revision Application Packages, please refer to the FEMA website at <http://www.fema.gov/business/nfip/forms.shtm>.

6-1
cont.

Please Note:

Many NFIP participating communities have adopted floodplain management building requirements which are more restrictive than the minimum federal standards described in 44 CFR. Please contact the local community’s floodplain manager for more information on local floodplain management building requirements. The Fairfield floodplain manager can be reached by calling Peter Wright, Jr., Engineer, at (707) 428-7784. The Solano County floodplain manager can be reached by calling Birgitta Carsello, Director, Department of Public Works, at (707) 784-6765.

6-2

If you have any questions or concerns, please do not hesitate to call Jane Hopkins of the Mitigation staff at (510) 627-7183.

Sincerely,



Gregor Blackburn, CFM, Branch Chief
Floodplain Management and Insurance Branch

cc:

Peter Wright, Jr., Engineer, City of Fairfield
Birgitta Carsello, Director, Department of Public Works, Solano County
Ray Lee, State of California, Department of Water Resources, North Central Region Office
Jane Hopkins, Floodplanner, DHS/FEMA Region IX
Alessandro Amaglio, Environmental Officer, DHS/FEMA Region IX

www.fema.gov

Comment Letter 6, Gregor Blackburn, CFM, Branch Chief, Floodplain Management and Insurance Branch, U.S. Department of Homeland Security, FEMA, 09/29/10

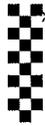
Response to Comment 6-1

Flood Insurance Rate Maps (FIRMs) were reviewed and are provided in Figures 3.2.1-1 through 3.2.1- 7 at the end of Section 3.2.1 in the Draft and Final EIR/EIS. A discussion of the Flood Zones within the project area is provided in Section 3.2.1 of the Draft EIR/EIS. All structures proposed for this project will meet NFIP building requirements. The proposed truck scales, which are to be constructed in the floodplain of Raines Drain, will be elevated and will include underground structures for stormwater storage, as discussed in Section 3.2.1 of the Draft and Final EIR/EIS.

Response to Comment 6-2

The adjacent communities of the city of Fairfield and the County of Solano have been contacted and they both adhere to the standards described in 44 CFR.

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SOLANO LAND TRUST (707

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p.1



Letter 7

October 5th, 2010

Howell Chan

Environmental Analysis Office Chief, Caltrans District 4

P.O. Box 23660, MS-8B

Oakland, CA 94623-0660

Board Members

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Immediate Past President

Directors

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Albert Lavezzo
Russell Lester
Frank Morris
Sean Quinn
Linda Seifert

Subject: Comments Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the I-80/I-680/SR 12 Interchange Project

Dear Mr. Chan:

Solano Land Trust (SLT) holds an agricultural conservation easement in perpetuity on property along the route of the project, known as the Valine easement APNs: 27-251-33; 27-271-06; 27-251-34; 27-251-4-; 27-251-42; 27-251-44. SLT is submitting comments in response to the Environmental Impact Statement/ Report. These comments are submitted with approval from SLT's Executive Committee.

Chapter 3 of the EIR/EIS, describes in detail Solano County's commitment to preserving prime farmland as demonstrated by various provisions in the 2008 Solano County General Plan and the Draft Suisun Valley Strategic Plan. In the year 2000, the Department of Conservation's California Farmland and Ranchland Protection Program (CFCP) specifically recognized the value of protecting the agricultural value of the Valine Ranch when it funded the conservation easement transaction with State dollars.

7-1

Discussion of Impacts to Agricultural Land is Inadequate

The EIS/EIR appears to only discuss the direct conversion of farmland (pages 3.1.3-9 and 3.1.3-10). There is no discussion of indirect or secondary impacts of the conversion of farmland. What will be the impact on adjacent farmland due either to the operation of new highway facilities or an overall reduced amount of farmland in the area. For example, Table 3.1.3-3 states that a total of 72.46 acres are under a conservation easement held by SLT. On page 3.1.3-10 it states that 22.5 acres of this area will be converted to another use. Will the remaining parcel under the conservation easement (approximately 50 acres) remain a viable piece of farmland and remain in agricultural use?

7-2

1001 Texas Street, Suite C, Fairfield, CA 94533-5723 • Phone 707-432-0150 • Fax 707-432-0151 • www.solanolandtrust.org

Received Time Oct. 11, 2010 5:38PM No. 5550

Original art by Don Birrell

Oct 11 10 05:05p

SOLANO LAND TRUST (707

7074320151

p.2

Mitigation Measures Are Inadequate

Page 3.1.3-11 under the section title "Compensation for Conversion of Important Farmland," the report states "Lands under an agricultural conservation easement are considered to have higher agricultural value than other agricultural land in the project area." Given the special importance of lands protected under a conservation easement the proposed 1.25: 1 mitigation ratio for the loss of the Valine Ranch lands is insufficient. The proposed mitigation does not reflect the demonstrated public and conservation value that will be lost with the conversion of protected farm land. SLT recommends a minimum 2:1 ratio be used to mitigate for the agricultural conservation easement lands lost by this project.

7-3

Furthermore, the mitigation does not describe sufficiently how it will be accomplished, the location for the mitigation, and the timing. The mitigation states that "long-term land use restrictions such as agricultural conservation easements shall be obtained over Prime Farmland within Solano County...". First, it is not clear what "long-term land use restrictions" are being suggested. The farmland must be protected in perpetuity and through the use of a conservation easement. Second, the protected farmland must be in the close vicinity to the converted farmland, at a minimum we suggest within the Suisun Valley. Third the farmland must be secured and protected prior to the operation of the first phase of the project.

7-4

Please feel free to contact me with questions.

Best regards,



Nicole Byrd
Executive Director, Solano Land Trust

Received Time Oct. 11. 2010 5:38PM No. 5550

Comment Letter 7, Nicole Byrd, Executive Director, Solano Land Trust, 10/05/10

Response to Comment 7-1

Comment noted.

Response to Comment 7-2

Indirect or secondary impacts to farmlands would be minimal to none as a result of the project. Farmlands that are affected by the project are already located in close proximity (directly adjacent) to major transportation facilities (Interstate 80, interstate 680 and State Route 12). The farmlands within the project area do not appear to be significantly affected or less productive due to their close proximity to these major transportation facilities. Given the existing conditions, the project would not introduce any indirect or secondary impacts to these agricultural parcels located immediately adjacent to the transportation facilities. Thus, the remaining portions of parcels affected would not be subject to less productivity as farmland.

Response to Comment 7-3

Under NEPA, based on the results of the Farmland Conversion Impact Rating, the project alternatives will not result in a substantive adverse effect on farmlands. Under CEQA, the Department will, however, mitigate for agricultural impacts, on a case by case basis, in a quantity or ratio according to professional judgment based on local plans, the type of farmland, and economic impacts. In this project, important farmland (“prime farmlands”) will be mitigated at a 1:1 ratio (one acre protected for every one acre affected). Farmlands under an agricultural conservation easement will be mitigated at a slightly higher ratio, 1:25:1.

Agricultural land is a finite resource. However, the project mitigation will require the conservation of an equal amount of agricultural land and acquisition of a larger conservation easement; this mitigation would replace the land that is lost. For CEQA purposes, therefore, the proposed project’s impact on farmland is less than significant after mitigationconsiderable.

Response to Comment 7-4

As discussed in Section 3.1.3 of the Draft and Final EIR/EIS, mitigation would consist of obtaining long-term land use restrictions such as agricultural conservation easements over Prime Farmland within Solano County. Conservation easements are generally in perpetuity as suggested by the commenter. Mitigation of important farmlands will occur prior to beginning construction activities that affect such farmlands.

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Letter 8

"Richard Wirth" <wirthR@SIDwater.org>

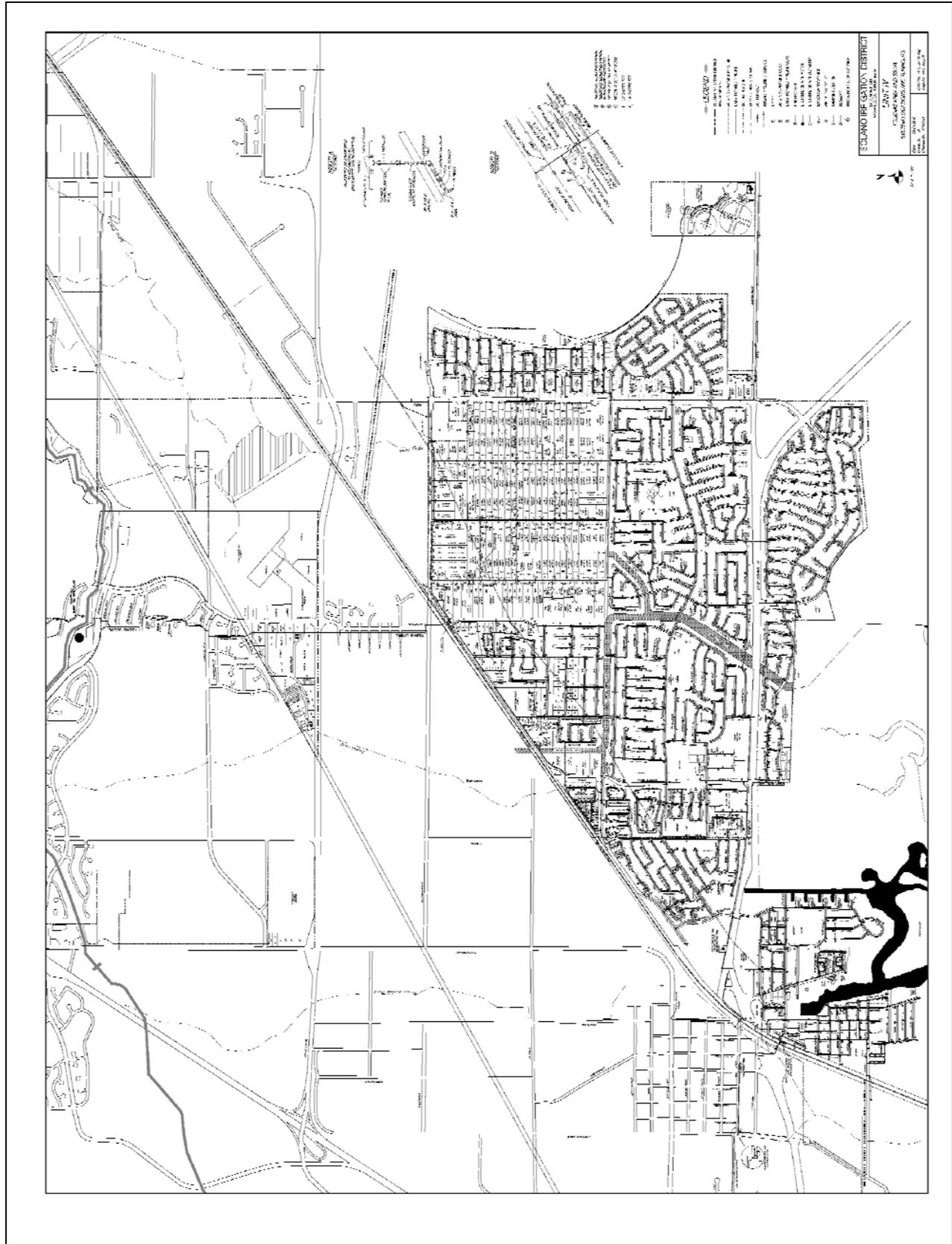
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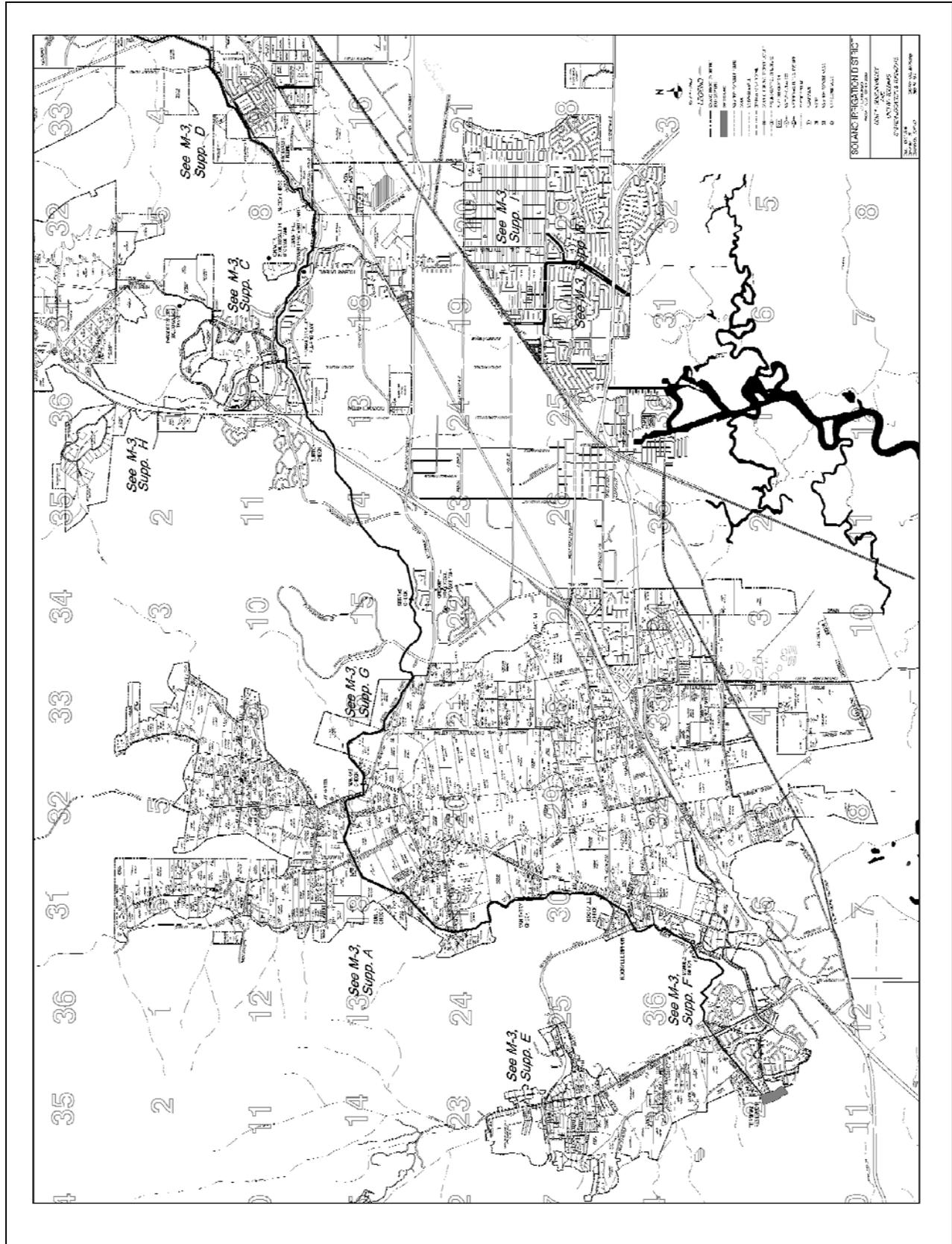
To <howell_chan@dot.ca.gov>
cc "Justin Hopkins" <jhopkins@SIDwater.org>
Subject I-80/I-680/SR12 Interchange Project

Hello Mr. Chan:
Solano Irrigation District and the Suisun Solano Water Authority have multiple water and drainage facilities that are adjacent to, or cross I-80 and State Route 12. I have attached several facility location maps showing a graphic representation of our facilities in the general area of your project. Please contact me on getting more specific information on the facilities that you determine will be impacted by your project. We will be providing additional comments on the Draft EIR as soon as possible.
Thanks.
-Richard

8-1

Richard Wirth
Assistant Civil Engineer
Solano Irrigation District
508 Elmira Road
Vacaville, California 95687
707-455-4018 Office
707-452-8557 Fax
707-249-6073 Cell
rwirth@sidwater.org
(See attached file: SSWA Facility Map.PDF)(See attached file: SID Facilities.PDF)(See attached file: SID N_Cordelia-Corp_Cmns Facilities.PDF)





Comment Letter 8, Richard Wirth, Assistant Civil Engineer, Solano Irrigation District, 10/06/10

Response to Comment 8-1

Comment noted.

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Letter 9

"Justin Hopkins" <jhopkins@SIDwater.org>

10/07/2010 11:39 AM

To "Richard Wirth" <wirthR@SIDwater.org>, <howell_chan@dot.ca.gov>
CC
Subject RE: I-80/I-680/SR12 Interchange Project

Good morning Mr. Chan:
I have reviewed the Draft EIR for the I-80/I-680/SR12 Interchange Project and have the following comments on section 3.1.5 Utilities and Emergency Services:

Water Service

1. The Solano County Water Agency has the master contract with the U.S. Bureau of Reclamation for the Solano Project, which is a source of water for the county, but is not effected by this project.
2. The Solano Irrigation District owns and operates facilities within the proposed project area that deliver agricultural water to customers on the north and south side of the project.
3. The Suisun Solano Water Authority (SSWA), composed of the SID and Suisun City, operate a treatment plant outside of the project area that delivers potable water to the City of Suisun.

9-1

Environmental Consequences

Potential Effect to Utilities

1. This section reads correctly as any SID or SSWA facilities affected by the project would need to be relocated, realigned, or extended.

9-2

The exact description of "water Service" purveyors within the project area is not important, but should be corrected to reflect the information provided above. Thank you for the opportunity to review and comment on the Draft EIR. Please feel free to contact Richard Wirth or I with any questions or if you require additional information.

9-3

Respectfully,

Justin Hopkins, E.I.T.
Assistant Civil Engineer
Solano Irrigation District 707.455.4007
Fax: 707.452.8557
jhopkins@sidwater.org

The information transmitted herewith is intended solely for the use of the addressee and may include confidential or privileged product. Unauthorized use, duplication, disclosure, or dissemination of the information contained in the electronic mail transmission is strictly prohibited. If this transmission is received in error, please immediately, contact Justin Hopkins at the above referenced telephone number or electronic mail address.

Comment Letter 9, Justin Hopkins, E.I.T., Assistant Civil Engineer, Solano Irrigation District, 10/07/10

Response to Comment 9-1

Comment noted.

Response to Comment 9-2

Comment noted.

Response to Comment 9-3

A discussion of the water suppliers in the project area has been added to Water Services Section 3.1.5 of the Final EIR/EIS.

Letter 10

"jfutini@juno.com <jfutini@juno.com>

09/11/2010 06:07 PM

To Howell_chan@dot.ca.gov
cc
Subject I-80, I-680, Hwy 12 Project

Mr. Chan,
I'll tell you the same thing that I emailed to Jane Adams of Solano Transportation Agency when that project was started. It would waste millions of dollars and succeed in doing nothing but add additional lanes and further congest I-80. My suggestion was to separate I-680 from connecting with I-80 and divert it to run along the railroad tracks all the way to Sacramento where it would merge into Hwy 50. This would give traffic an individual alternate route to the capitol and beyond to Nevada. The funds spent on your I-80, I-680, in doing what your doing, could build that separate highway and dramatically change things. Caltrans is fifty years behind the times in highway construction. Hwy 12 should be a full freeway from I-5 to Hwy101. What do we have? A patchwork of two-lane, antiquated roadways with some passing lanes. Congestion is so impacting our highways where the amount of vehicles far surpasses the ability and the integrity of the roadway that it doesn't take an Einstein to realize that unless Caltrans gets with it we will have more than a gridlock catastrophe! Something needs to be done immediately and not by 2035. If Caltrans goes like they are going, when they reach 2035 with their highway plans, they will be seventy-five years behind the times. Today's traffic can't wait. I hope somebody wakes up. John Futini

10-1

10-2

10-3

Comment Letter 10, John Futini, 09/11/10

Response to Comment 10-1

The fundable phase of the project is expected to cost approximately \$600 million (\$557 million for Alternative B, Phase 1 and \$686 million for Alternative C, Phase 1) as noted in Table 2-4 of the Draft EIR/EIS. Table 2-4 in Section 2.8.1 of the Final EIR/EIS has been updated to reflect costs based on more current estimates. The project would result in adding lanes to both I-680 and I-80, as well as to SR 12. The addition of these lanes would reduce congestion by accommodating projected growth.

Response to Comment 10-2

Two alternatives similar to that proposed by the commenter were considered early in the planning process for the interchange project. A four-lane freeway (referred to as the South Parkway) would diverge from I-680 at Gold Hill, run parallel to and south of the railroad tracks and merge with SR 12 at Pennsylvania Avenue. The other similar alternative consisted of an alignment parallel, and adjacent, to the UPRR Capitol Corridor line beginning either at the I-680/Parish Road interchange or the I-680 Marshview Road interchange and extending northeasterly merging with SR 12 at Pennsylvania Avenue. These two alternatives were rejected because each would place a transportation facility within the Primary Suisun Marsh, which is prohibited by state law (the Suisun Marsh Preservation Act of 1974). See Section 2.6 of the Draft EIR/EIS for a discussion of this alternative and other alternatives considered but eliminated from further consideration. Other corridor planning efforts for SR 12 are underway.

Response to Comment 10-3

The Department and other transportation planning agencies agree that congestion through the I-80/I-680/SR12 Interchange is a major problem. The Department will be implementing improvements as expeditiously as possible.



SOLANO COUNTY
Department of Resource Management
Public Works Engineering
675 Texas Street, Suite 5500
Fairfield, CA 94533
www.solanocounty.com

Letter 11

Telephone No.: (707) 784-6765
Fax No.: (707) 784-2894

Bill Emlen, Director
Clifford K. Covey, Assistant Director

October 8, 2010

Caltrans District 4
Attn: Howell Chan
Environmental Analysis Office Chief
P.O. Box 23660, MS-8B
Oakland, CA 94623-0660

Re: I-80/I-680/SR12 Interchange Project Draft EIR/EIS

Dear Mr. Chan:

Thank you for preparing the I-80/I-680/SR12 Interchange Project Draft EIR/EIS. Improvement of this intersection is the top regional transportation priority for the Solano County area, and is one of the key transportation projects for the Bay Area as a whole. The existing substandard intersection configuration is not well suited to handle the growth in regional traffic expected to occur in the future, and must be improved.

11-1

Both Alternative B (maintaining the existing interchange location) and Alternative C (relocating the interchange to the west to align with SR12 West) would provide significant benefits to the traveling public by substantially reducing congestion compared with the No Build alternative. In some ways, Alternative B provides a greater reduction in delays than Alternative C. However, Alternative C also provides a number of advantages relative to Alternative B. Among them are:

- 1. It would create one I-80/I-680/SR12 interchange, instead of having two separate interchanges (I-80/I-680 and I-80/SR12) in close proximity. Such a configuration is generally favored by FHWA and Caltrans, and may provide improved safety and congestion relief.
2. The relocated interchange would be located west of the existing interchange location. This will increase the separation between the interchange and the I-80 truck scales in both directions, again providing improved safety and congestion relief.

11-2

Building & Safety: David Cliche, Chief Building Official
Planning Services: Mike Yankovich, Program Manager
Environmental Health: Terry Schmidtbauer, Program Manager
Administrative Services: Suganthi Krishnan, Sr. Staff Analyst
Public Works Engineering: Paul Wiese, Engineering Manager
Public Works Operations: Wayne Spencer, Operations Manager

3. Unlike Alternative C, Alternative B would have northbound I-680 traffic merging into I-80 traffic on the left side. This non-standard configuration could be confusing to motorists, and could impact traffic safety and congestion.

11-2
cont.

For these reasons, Solano County prefers Alternative C, and supports Phase 1 of Alternative C as an interim fundable project.

Thank you for the opportunity to comment on the environmental documents. Please call me at (707) 784-6072 if you have any questions.

Sincerely,



Paul Wiese
Engineering Manager

c. Mike Yankovich, Planning

U:/users/pwicse/data/word/STA/I-80 I-680 comment letter.doc

***Comment Letter 11, Paul Wiese, Engineering Manager, Solano County,
Department of Resource Management, Public Works Engineering, 10/08/10***

Response to Comment 11-1

Comment noted.

Response to Comment 11-2

Comment noted.

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Letter 12

Jackie Kepley <jrkepley@yahoo.com>

10/11/2010 08:27 AM

To howell_chan@dot.ca.gov
cc
Subject I-80/I-680/SR12 Interchange Project

Dear Howell Chan,

My name is Jackie Kepley and I am a homeowner in the Cordelia Village Neighborhood. In fact my backyard is right against Red Top Road. Having commuted from Cordelia to Napa and back for a year and now to Benicia and back, I completely agree that something needs to be done in regards to I-80/I-680/SR12. However looking at the plans that were received I have to disagree with the plan.

12-1

My first complaint on both plans is that it appears an on and off ramp will be added from 680 connecting to Red Top Road. Not only is this road busy most hours of the day but it also goes in front of a high school. I find this VERY dangerous for the children as well as the parents trying to drop off and pick up their children. Living so close to the High School I know for a fact that children are present from 7am or earlier until 8pm or later with sports practice etc. That hardly qualifies as "Reduce the amount of cut-through traffic on local roads"

12-2

As for Alternative C, where I-680 would be realigned to connect directly with the I-80/SR 12 interchange, I can't help but feel that this would bring the traffic and accompanying noise even closer to the surrounding neighborhoods. Has a study been conducted to measure the amount of noise this will add??? And again.....it appears to come rather close to the high school. Has anybody considered adding a junction between I-680 and Highway 12 in Suisun??

12-3

12-4

Thank you for your time,

Jackie Kepley

549 Silverado Circle
Fairfield, CA 94534
707-258-1452

Comment Letter 12, Jackie Kepley, 10/11/10

Response to Comment 12-1

Comment noted.

Response to Comment 12-2

The commenter expresses concern that construction of Alternative C, Phase 1 would result in increased traffic along Red Top Road in front of Rodriguez HS that could affect intersection operations and student safety.

Based on the 2035 traffic forecasts, without the project (No-Build Alternative), Red Top Road east of I-80 would have approximately 2,095 vehicles in the AM peak hour and 2,445 vehicles in the PM peak hour. With Alternative C, Phase 1, traffic projections forecast 1,605 vehicles for the same location in the AM peak hour and 2,460 vehicles in the PM peak hour. This represents a 23 percent reduction in the number of AM peak hour trips and less than a 1 percent increase in the number of PM peak hour trips as a result of constructing Alternative C, Phase 1. Thus, traffic operations adjacent to the school are expected to remain the same or improve with the project.

Generally with increased traffic there is a corresponding increase in congestion related (rear-end type) accidents. A decrease in congestion generally results in fewer congestion-related accidents. Thus, Red Top Road is expected to be a safer facility for students, residents, and others with the construction of Alternative C, Phase 1 than with the No-Build Alternative (without the project).

Response to Comment 12-3

Federal regulation 23CFR772 requires that traffic noise levels associated with federally-funded projects such as this be evaluated under the federal regulation. A Noise Study Report was prepared in accordance the requirements of the regulation and applying Caltrans' Traffic Noise Analysis Protocol. Under Alternative C, I-680 would be realigned to the west away from residences located along Bridgeport Avenue and Ritchie Road. The existing alignment of I-680 north of Red Top Road would be converted to a local access road. Under Alternative C, traffic noise levels are predicted to increase by up to 4 dB at residential and park uses along I-680 under both Phase 1 and full build conditions, as a result of increased traffic volumes on I-680. These results are summarized in Table 3.2.7-4, and the locations that were modeled are shown in Figure 3.2.7-12 of the Draft and Final EIR/EIS. Absolute noise levels are predicted to approach or exceed the noise abatement criterion of 67 dBA L_{eq} at Rolling Hills Park and a residence on Ramsey Road. Noise abatement in the form of noise barriers were evaluated but were determined to exceed criteria for reasonableness of cost. This increase, however, does not constitute a significant traffic noise impact (an increase of 12 dB over existing levels) as defined in the Caltrans Noise Protocol. The technical studies supporting these findings are available at the Department District 04 and STA offices.

Response to Comment 12-4

An alternative similar to that proposed by the commenter was considered early in the planning process for the interchange project. A four-lane freeway (referred to as the South Parkway) would diverge from I-680 at Gold Hill, run parallel to and south of the railroad tracks and merge with SR 12 at Pennsylvania Avenue. This alternative was rejected because it would place a

transportation facility within the Primary Suisun Marsh, which is prohibited by state law (the Suisun Marsh Preservation Act of 1974). See Section 2.6 of the Draft EIR/EIS or Section 2.5.2 of the Final EIR/EIS for a discussion of this alternative and other alternatives considered but eliminated from further consideration.

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Letter 13

Jeff Dittmer <jfdittmer@sbcglobal.net>

10/11/2010 03:51 PM

To Howell_chan@dot.ca.gov
cc
Subject Comments I-80 I-680 SR-12

In regards to the EIR/EIS for the I-80 I-680 SR-12 Interchange Project:

1. Bicycle paths.

(a) The plan shows a bicycle path extending south from the end of Business Center Drive along the edge of our family's property to the proposed ramp from WB 80 to SR12. Note that there is a 5.99 acre parcel, APN 0148270060, that is landlocked from any public street. That parcel has access via a recorded right of way over the adjacent parcel to the end of Business Center Drive. Although both parcels are owned by our family, the ownership is by different individuals and the parcels could be developed separately. The proposed bicycle path is on the right of way that provides the only public access for that parcel. If a bicycle path is constructed in that location it can not be allowed to eliminate access for the 5.99 acre parcel.

13-1

(b) The plan also shows a bicycle path extending from the end of Mangels Blvd to the end of Business Center Dr. The driveway into our ranch extends from the end of Mangels Blvd. The SW corner of the adjacent Jayo property comes very close to that driveway, but it will remain workable upon development of Jayo's property, which is supposed to begin next year. If a bicycle path were built around the corner of the Jayo property it would require major realignment and reconstruction of our driveway, which needs to be accessible to large trucks as well as cars. We request that you reconsider this component of the plan. Perhaps part of the path could be incorporated into Jayo's landscaping to avoid the corner.

13-2

(c) We also request that if these paths are built that a security fence matching that at the entrance to our driveway and along Mangels Blvd be constructed to separate them from our property.

13-3

2. New roadway connecting Red Top Road/SR-12 interchange and Business Center Drive.

(a) This proposed roadway will cut our property in two. Back and forth access must be maintained for ranching activities. We also have a domestic water line that the proposed roadway crosses. Access for that water line must be maintained in such a way as to allow for repairs and maintenance. We have received verbal assurances that an adequately sized tunnel for vehicle and livestock access and a utility passageway that would accommodate a water line are to be included. Please confirm.

13-4

(b) This proposed roadway as well as the freeway improvements will leave our property with very limited access. In the event the property is developed, the project will have eliminated previously anticipated means of access. We request that adequate future access from the proposed roadway be provided as well as adequate access for its current use as a ranch headquarters.

13-5

Jeff Dittmer
(707) 372-5760
jfdittmer@sbcglobal.net

Comment Letter 13, Jeff Dittmer, 10/11/10

Response to Comment 13-1

Access will be maintained to commenter's property. Final location and details of the access will be developed during final design. Figure L-1, which shows the preliminary alignment of the bicycle path, security fence, driveway access to property and access underneath the proposed extension of Business Center Drive, has been added in this response to this comment.

Response to Comment 13-2

Comment noted. STA and the Department have removed the segment of bicycle path that would connect Mangels Boulevard to Business Center Drive from consideration as part of this project. This was done because the City of Fairfield determined there is no need for a separate bicycle connection between Mangels Boulevard and Business Center Drive at the westerly city limit.

Response to Comment 13-3

The proposed bicycle path that would run from Business Center Drive to the south and then along I-80 and State Route 12 west would be separated from the commenter's property by a fence. This fence will be included as part of the bicycle path construction. Please see Figure L-1 on the following page.

Response to Comment 13-4

A 14-foot-high arch undercrossing of the Business Center Drive Extension, sufficient for use by livestock, has been incorporated into the project approximately 750 feet west of the current westerly terminus of Business Center Drive. The final location will be determined during the final design phase. Please see Figure 3.3-8 in the Final EIR/EIS.

Response to Comment 13-5

The proposed Business Center Drive extension will provide access to the Commenter's property at preliminary driveway locations approximately 500 feet west of the current westerly terminus of Business Center Drive as shown in Figure L-1. The final access locations and details will be determined during final design.

Letter 14



11 October 2010

Howell Chan, Environmental Analysis Branch Chief
California Department of Transportation, District 04
P.O. Box 23660, MS-8B
Oakland, CA 94623-0660
howell_chan@dot.ca.gov

RE: Draft EIR Interstate 80/Interstate 680/State Route 12 Interchange Project

Dear Mr. Chan,

I am writing to provide comments on the Draft EIR for the Interstate 80/Interstate 680/State Route 12 Interchange Project on behalf of the Bay Area Ridge Trail Council. We appreciate this opportunity to provide input regarding the proposed project in connection with the Bay Area Ridge Trail (Ridge Trail) in Solano County.

The Ridge Trail Council is a 501(c)(3) non-profit organization dedicated to completing the Ridge Trail, a continuous public trail on the ridgelines surrounding the San Francisco Bay. As planned, the Ridge Trail will connect open spaces and parklands in the nine Bay Area counties on a 550-mile trail for hikers, equestrians, mountain bicyclists, trail runners, and outdoor enthusiasts of all ages, abilities and incomes. Today over 330 miles are dedicated and we are working to connect up the rest. For over 20 years we have been working with the Solano County Board of Supervisors, Solano Transportation Authority, Solano Land Trust and the cities of Fairfield, Vallejo and Benicia to plan and implement the Ridge Trail through Solano County.

Provided below is background information on Ridge Trail Council's history in Solano County and its regional significance followed by our comments on the Draft EIR.

14-1

Background

In Solano County, about 30 miles of Ridge Trail are complete and another 24 miles are being planned. A map showing the existing Ridge Trail segments within Solano County is attached (see attached SolanoFinMap). The City of Fairfield recently (on 9/30/10) dedicated McGary Road, from Red Top Road to Lynch Canyon Open Space as an official segment of the Ridge Trail (see attached McGary Rd fin pease map). In addition to McGary Road, dedicated Ridge Trail segments near the project site include those in Rockville Hills Regional Park, Lynch Canyon Open Space and Hiddenbrooke Open Space.

The Ridge Trail's entire regional trail alignment has been adopted as a Priority Conservation Area (PCA) within the San Francisco Bay Area FOCUS strategy. FOCUS is a regional development and conservation strategy led by the Association of Bay Area Governments and the Metropolitan Transportation Commission, with support from the Bay Area Air Quality Management District and the Bay

Conservation and Development Commission that promotes a more compact land use pattern for the Bay Area. Priority Conservation Areas are areas of regional significance that have broad community support and an urgent need for protection. These areas provide important agricultural, natural resource, historical, scenic, cultural, recreational, and/or ecological values and ecosystem functions. FOCUS’s purpose of designating PCAs is to accelerate protection of key natural lands in the San Francisco Bay Area through purchase or conservation easements within the next few years.

14-1
cont.

Ridge Trail Council Comments on the DEIR Interstate 80/Interstate 680/State Route 12 Interchange Project

The Ridge Trail Council supports:

1. The following 2 quotes from the DEIR:
 - a. In section 2.5.2 on page 225, “Under a smart-growth alternative, new approaches to transportation planning, such as better coordinating land use and transportation; increasing the availability of high-quality transit service; creating redundancy, resiliency and connectivity within the local road networks; and ensuring connectivity between pedestrian, bike, transit, and road facilities, would be implemented.”
 - b. In Chapter 3 on page 3.1.6-3, “The Department, as assigned by FHWA, directs that full consideration should be given to the safe accommodation of pedestrians and bicyclists during the development of federal-aid highway projects (see 23 CFR 652).”
2. The implementation of all Ridge Trail related bicycle and pedestrian facilities be included in Phase I of implementation for the project.

14-2

The Ridge Trail Council requests the following changes in the DEIR:

1. Connections to proposed project being considered in the Jamison Canyon Corridor Study. The Solano Transportation Authority, Bay Area Ridge Trail Council and other Solano County agency partners are conducting a Jameson Canyon Corridor study for a Class I bike/pedestrian path along the SR12 corridor. The Draft EIR should analyze how this proposed trail would connect to the planned bike/pedestrian trail along the Business Center Drive extension. With the proposed Business Center Drive overcrossing of SR 12 and the railroad at the intersection with Red Top Road, it is unclear how the Jamison Canyon trail would connect to this new overcrossing and Red Top/Business Center Drive.
2. Appendix B, B.1.1. City of Fairfield, Trails and Bikeways, page 8:
 - a. Paragraph 2. The Draft EIR states that the Bay Area Ridge Trail is not within the City of Fairfield General Plan. This is incorrect. The Bay Ridge Trail is referenced in the City of Fairfield General and has been supported by resolution of the City of Fairfield City Council. The Bay Area Ridge Trail is also included in the Solano County General Plan and has been supported by resolution by the Solano County Board of Supervisors.
 - b. Paragraph 3. At the end of this paragraph, the document states that the closest completed and open segment of the Bay Area Ridge Trail is located approximately 1.5 miles south of the project area. On September 30, 2010, the Ridge Trail segment along McGary Road from Red Top Road to Hiddenbrooke Drive was dedicated by the City of Fairfield and the Ridge Trail Council. With this dedication, a completed and open segment of the Ridge Trail is now located immediately adjacent to the project area.
 - c. Paragraph 4. The Ridge Trail corridor as currently planned would have utilized the existing I-80 bike path from Red Top Road/SR12 along I-80 to Green Valley Road. This project will relocate the path to the Business Center Drive Extension. With this change there are now several alternatives for completing the gap between the existing segments of the Ridge Trail that end at Mc Gary Road and Green Valley Road. The EIR should note that the Ridge Trail alignment would extend from McGary Road north along Red Top Road and the new Business Center Drive Extension to the New Bike

14-3

14-4

14-5

14-6

Path Alignment at the intersection with the existing Business Center Drive roadway. At this point the Ridge Trail could continue along Business Center Drive to Green Valley Road then north along Green Valley Road to the existing trail segment on Green Valley Road. Alternatively, the Ridge Trail could follow the new Bike Path Alignment to Mangels Blvd and then east along Mangels Blvd to Green Valley Road then north on Green Valley Road to the existing Ridge Trail segment. These two potential alignments for the Bay Area Ridge Trail should be included as part of the EIR analysis.

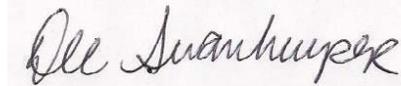
14-6
cont.

3. The Final EIR should include a figure and detailed description of the Bike/Pedestrian improvements what would be a part of this project. The Draft EIR States that the Bike/Pedestrian improvements will follow Fairfield General Plan Bike Network and North Connector Corridor Transportation for Livable Communities studies and that after construction the Bike/Pedestrian improvements will utilize the new extension of Business Center Drive to cross over SR 12W and rail line to connect with Red Top Road. The figure and description should show and describe the actual project Bike/Pedestrian improvements and how connections from these improvements will be made to the existing and planned trails at McGary Road/Red Top Road, Jamison Canyon/SR12 and the existing Bike/Pedestrian paths in North Cordelia.

14-7

On behalf of the Ridge Trail Council and our numerous supporters, we appreciate the opportunity to provide input. We would be happy to discuss or provide any additional information related to the Ridge Trail. Please do not hesitate to contact me to discuss any aspect of our remarks as they relate to this proposed project.

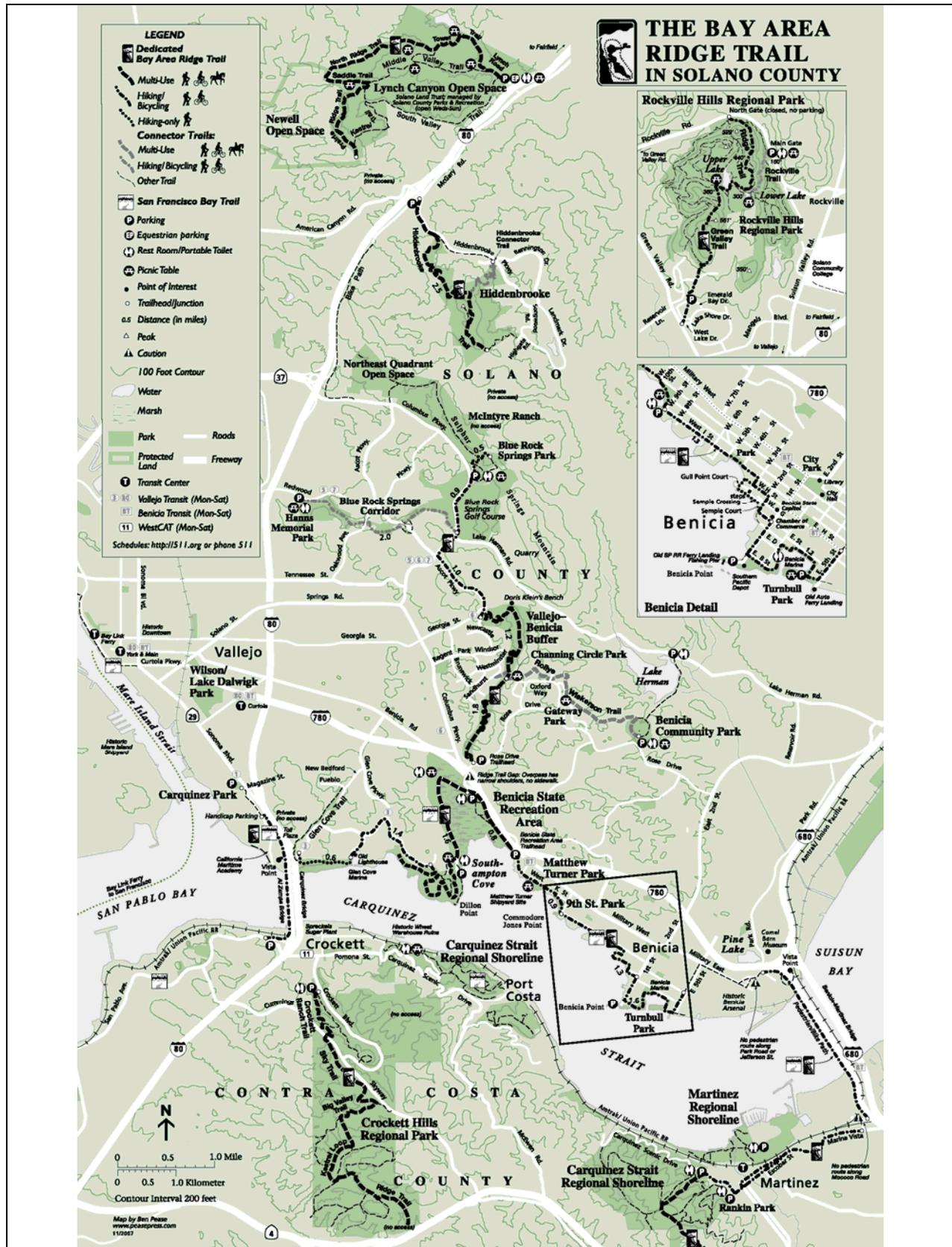
Sincerely,

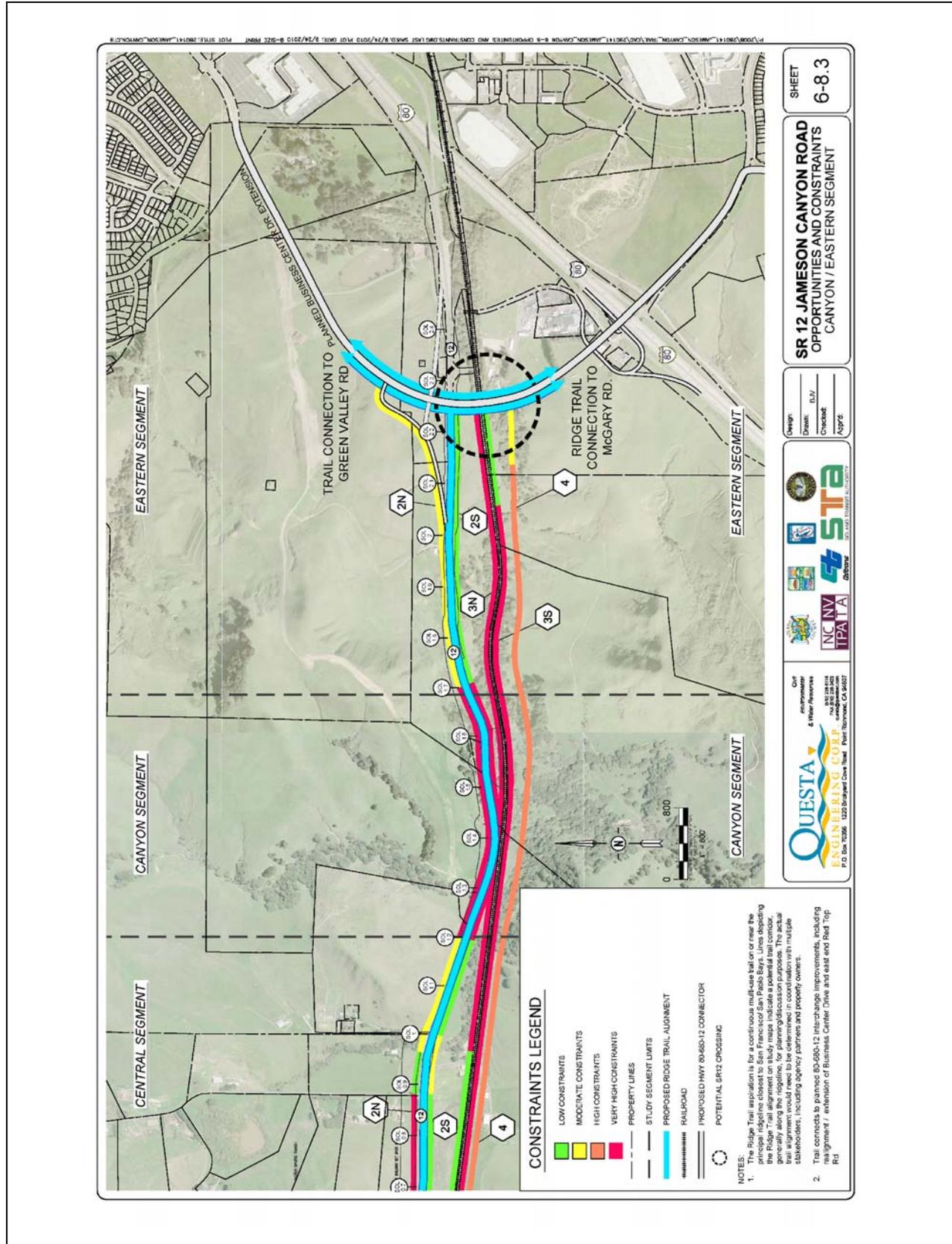


Dee Swanhuysen, North Bay Trail Director

Attachments: SolanoFinMap
Jameson_Canyon 6-8 Sheet 6-8.3 copy
McGary Rd fin pease map

CC: Daryl Halls, STA Executive Director
Janet Adams, STA Director or Projects
Sara Woo, STA Strategic Planning





Comment Letter 14, Dee Swanhuysen, North Bay Trail Director, Bay Area Ridge Trail Council, 10/11/10

Response to Comment 14-1

Comment noted.

Response to Comment 14-2

The first quote that the commenter supports (Section 2.5.2) refers to the Smart Growth Alternative which was removed from consideration as a stand-alone alternative because it did not meet the project purpose and need. Though this alternative was rejected, elements of it are being implemented by STA outside of this project.

Alternative C, Phase 1 would include the construction of a bicycle path along the western boundary of the business park at the west end of the existing Business Center Drive parking lot, and along the north side of the new connector from westbound I-80 to westbound SR 12W to maintain access between the existing bicycle path along Jameson Canyon Road (SR 12W) and Business Center Drive. This path would be removed when Business Center Drive is extended to the SR 12W/Red Top Road interchange because bicyclists would be able to utilize the extension of Business Center Drive to reach Red Top Road and points west.

The bicycle facilities included in Alternative C, Phase 1 would allow Ridge Trail users to traverse the project area to reach existing Ridge Trail facilities both north and south of the immediate project area. However, Ridge Trail-related facilities are not part of the project.

Response to Comment 14-3

The Jameson Canyon Corridor Study being conducted by STA is currently underway and will study how connections with the interchange improvements could be achieved. The interchange project has included analysis of pedestrian and bicycle facilities within the immediate interchange study area and includes improvements to facilitate bicycle and pedestrian movements through the project area.

Response to Comment 14-4

Page B-8 of Appendix B has been revised in this Final EIR/EIS to acknowledge a new segment of the Bay Area Ridge Trail that was dedicated by the City of Fairfield and the Ridge Trail Council in September 2010. This segment, which lies to the south of I-80 along McGary Road from Red Top Road to Hiddenbrooke Parkway, is located immediately adjacent to the western segment of the project alignment. The revised section also evaluates potential indirect project impacts to the segment, especially during construction.

Response to Comment 14-5

Comment noted. The bike path on McGary Road was dedicated and opened during the public review period of the Draft EIR/EIS. This segment, which lies to the south of I-80 along McGary Road from Red Top Road to Hiddenbrooke Parkway, is located immediately adjacent to the western segment of the project alignment. Appendix B, Page B-8 of the Final EIR/EIS has been revised to evaluate potential indirect project impacts to the segment, especially during construction. Further, the revised section discusses the project's beneficial impact of completing

the gap between the between the existing segments of the Ridge Trail between Green Valley Road and McGary Road.

Response to Comment 14-6

As discussed in response to comments 14-4 and 14-5 above, page B-8 of Appendix B has been revised in this Final EIR/EIS to acknowledge a new segment of the Bay Area Ridge Trail that was dedicated by the City of Fairfield and the Ridge Trail Council in September 2010. The revised section discusses the project's beneficial impact of completing the gap between the between the existing segments of the Ridge Trail between Green Valley Road and McGary Road.

As indicated in the comment, the project would remove the existing I-80 bike path from Red Top Road/SR12 West along I-80 to Green Valley Road and replace it with a bike path along the extension of Business Center Drive to SR12 West and Red Top Road/I-80 interchange. Segments of the Ridge Trail north and south of the project area could be connected through the project area following Business Center Drive to Green Valley Road as described in the comment letter.

Response to Comment 14-7

The pedestrian and bike improvements that would be constructed as part of the project are adequately described and shown in the Draft and Final EIR/EIS in Chapter 2 under the heading "Bicycle and Pedestrian Facilities" and on project maps (see Figures 2-2 and 2-3).

Letter 15

"Meier, Andrea J SPN" <Andrea.J.Meier@usace.army.mil>

10/14/2010 02:52 PM

To "Howell Chan" <howell_chan@dot.ca.gov>
cc "Ahmad Hashemi" <ahmad_hashemi@dot.ca.gov>,
"Zachary Gifford" <zachary_gifford@dot.ca.gov>,
"Durio, Hal E SPN contractor" <Hal.E.Durio@usace.army.mil>
Subject Comments on the I-80/I-680/SR-12 Interchange Project DEIR/DEIS

Dear Howell-

I would like to transmit my comments on the Interstate 80/Interstate 680/State Route 12 Interchange Project Draft Environmental Impact Report/Environmental Impact Statement, dated August 2010.

The purpose of the project is to reduce congestion; reduce cut-through traffic; encourage use of the HOV lanes and ridesharing; improve traffic safety; accommodate current and future truck traffic; and facilitate adequate enforcement by the CHP at the truck scales. The conclusion I made after reviewing the traffic modeling results is that both Alternative B and Alternative C would have minor to moderate improvements in vehicle hours of delay and vehicle speeds when projected out to 2035. Basically, Alternative B and Alternative C would maintain the level of service in the face of growth in the region. This indicates that even after implementing Alternative B or Alternative C congestion issues will remain a problem. Both Alternative B and Alternative C would have a beneficial impact to circulation for trucks entering and exiting the scales and improve the CHP's enforcement capabilities.

15-1

This following comment refers to the elevated structure in the Red Top Road interchange area proposed for Alternative C, Phase 1. I am not sure how you determined that the elevated structure over Green Valley fault should be designed to handle a minor displacement up to 1.9 feet. Is this an acceptable level of displacement given the maximum magnitude earthquake from the fault is a 6.75? Also, what type of structure displacement (lateral, vertical, etc) does this refer to or does it refer to ground displacement? what does this requirement affect in the bridge design? Have any preliminary designs for the elevated structure been considered that take in to account slope, orientation in regards to the fault movement, and other factors? I think most of the answers can be found in the draft geotechnical reports referenced in the Geology/Soils/Seismic/Topography section. If possible, can I get a copy of these electronically?

15-2

Large groups of impacts to sensitive aquatic resources occur in two locations in the project corridor: the Green Valley Creek vicinity and Pennsylvania Avenue area south of State Route 12. Alternative C would impact less wetlands within or near the Green Valley Creek Corporate mitigation site. Alternative C would also have a slightly reduced footprint in the area south of State Route 12 at Pennsylvania Avenue, resulting less impacts to waters of the U.S. Although the overall impacts for both alternatives do not differ significantly for a project of this scale, Alternative C appears to provide a plan that is less damaging to the larger groupings of aquatic resources than Alternative B. Alternative C would also have fewer temporary impacts to waters of the U.S. than Alternative B (4.52 acres versus 8.06 acres).

15-3

Lastly, I would like to point out that there is a remnant from a cut-and-paste action on page 3.16-14. There is a sentence that refers to Sacramento Regional Transit, which is outside of the geographical scope of this DEIR/DEIS.

15-4

Please let me know if you have a timeframe of when you would like to schedule a LEPDA concurrence checkpoint meeting or would expect a LEDPA determination based on the review of the DEIR/DEIS.

Thank you for the opportunity to participate early on in the development of this document as a cooperating agency.

Sincerely,

Andrea Meier, Sr. Regulatory Project Manager San Francisco District, U.S. Army
Corps of Engineers
1455 Market Street, 16th Floor
San Francisco, California 94103-1398
P (415) 503-6798
F (415) 503-6690
andrea.j.meier@usace.army.mil

Comment Letter 15, Andrea Meier, Sr. Regulatory Project Manager, San Francisco District, U.S. Army Corps of Engineers, 10/14/10

Response to Comment 15-1

Comment noted. The analysis provided in the Draft EIR/EIS indicates that under both alternatives congestion would remain, but would be improved over the no build alternative. In addition to improving truck circulation and CHP enforcement capabilities, the project would also increase distances between interchanges, thereby reducing weaving and potential accidents.

Response to Comment 15-2

A fault rupture characterization study was prepared for the Green Valley and Cordelia fault zones. The report's methodology and findings were reviewed and approved by the Department's Geologists and a peer review was performed by the USGS and the California Geological Survey staff. The study identified fault trace locations and likely maximum vertical and horizontal displacements which the Department's Division of Structures (DOS) concurred could be accommodated with the design of the respective elevated structures. A copy of the Fault Rupture Analysis has been provided to the USACE.

Response to Comment 15-3

Comment noted. While the differences in impact to aquatic resources between the two alternatives are minimal, Alternative C is slightly less damaging.

Response to Comment 15-4

The text in Section 3.1.6 of the Final EIR/EIS has been corrected to read Solano Regional Transit.

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United States Department of the Interior

FISH AND WILDLIFE SERVICE
Sacramento Fish and Wildlife Office
2800 Cottage Way, Room W-2605
Sacramento, California 95825-1846



Letter 16

In Reply Refer To:
81420-2009-TA-0857-1

October 18, 2010

Mr. Howell Chan
California Department of Transportation
111 Grand Avenue
P.O. Box 23660
Oakland, California 94623-0660

Subject: Draft Environmental Impact Report for the Interstate 80/Interstate 680/State Route 12 Interchange Project in Solano County, California (EA 0A5300)

Dear Mr. Chan:

This is in response to the draft Environmental Impact Report for the Interstate 80/Interstate 680/State Route 12 Interchange Project in Solano County, California. At issue are the potential adverse effects of the proposed project on the endangered Contra Costa goldfields (*Lasthenia conjugens*), designated critical habitat for the Contra Costa goldfields, threatened vernal pool fairy shrimp (*Branchinecta lynchi*), endangered vernal pool tadpole shrimp (*Lepidurus packardii*), endangered callippe silverspot butterfly (*Speyeria callippe callippe*), endangered showy Indian clover (*Trifolium amoenum*), threatened valley elderberry longhorn beetle (*Desmocerus californicus dimorphus*), threatened California red-legged frog (*Rana draytonii*), designated critical habitat for the California red-legged frog, threatened California tiger salamander (*Ambystoma californiense*), and wildlife. The U.S. Fish and Wildlife Service (Service) is issuing this letter under the authority of the Endangered Species Act of 1973, as amended (16 U.S.C. 1531 *et seq.*)(Act), and the Service's Mitigation Policy of 1956. Our comments and recommendations are provided to assist you with your environmental review of the project and are not intended to preclude future comments from Service.

16-1

The comments and recommendations in this letter are based on: (1) *Interstate 80/Interstate 680/State Route 12 Interchange Project Solano County, California District 4-SOL-80 (PM 10.8/17.0; SOL-680 (PM 10.0/13.1); SOL-SR 12 (PM 1.7/2.8); and SOL-SR-12 (PM 1.8/4.8) EA# 0A5300, Project # 04-0000-0150 Draft Environmental Impact Report/Environmental Impact Statement Volume One (DEIR) dated August 2010 that was prepared by the California*



Mr. Howell Chan

Department of Transportation (Caltrans); (2) various telephone conversations and meetings between the Caltrans and the Service; (3) meetings between the Caltrans, Service, and Solano Transportation Authority (STA), and (4) other information available to the Service.

Our comments and recommendations are limited to our review of the Preferred Alternative C in the DEIR, and hereafter in this letter will be referred to as the proposed project.

It is our understanding, the project encompasses the Interstate 680 and State Route 12 interchanges along Interstate 80 in the vicinity of the cities of Fairfield and Suisun City. The purpose of the project is to realign the interchanges and relieve traffic congestion throughout the area. The project covers approximately 13 miles of roadway including the three highways and relocation of the westbound Interstate 80 Cordelia Truck Scales, and modification and extension of existing surface streets. The project area is characterized by natural areas, such as streams, riparian corridors, vernal pools, wetlands, woodland, and open grassland communities, and also urban and agricultural land. The proposed project will include construction and the addition of infrastructure adjacent to existing urban areas, as well as in natural areas with listed species and significant value to wildlife.

16-1
cont.

Section 9 of the Act prohibits the take of the vernal pool fairy shrimp, vernal pool tadpole shrimp, callippe silverspot butterfly, valley elderberry longhorn beetle, California red-legged frog, California tiger salamander, and other federally listed species by any person subject to the jurisdiction of the United States. As defined in the Act, take is defined as "...to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or attempt to engage in any such conduct." "Harass means an intentional or negligent act or omission which creates the likelihood of injury to a listed animal by annoying it to such an extent as to significantly disrupt normal behavioral patterns which include, but are not limited to breeding, feeding, or sheltering." "Harm has been further defined to include habitat destruction when it injures or kills a listed species by interfering with essential behavioral patterns, such as breeding, foraging, or resting. Thus, listed species are protected from such activities as collecting and hunting, but also from actions that result in their death or injury due to the damage or destruction of their habitat. The Act prohibits activities that "...remove and reduce to possession any listed plant from areas under Federal jurisdiction; maliciously damage or destroy any such species on any such area; or remove, cut, dig up, or damage or destroy any such species on any other area in knowing violation of any law or regulation of any State or in the course of any violation of a State criminal trespass law." The term "person" is defined as "...an individual, corporation, partnership, trust, association, or any other private entity; or any officer, employee, agent, department, or instrumentality of the Federal government, of any State, municipality, or political subdivision of a State, or any other entity subject to the jurisdiction of the United States."

16-2

Take incidental to an otherwise lawful activity may be authorized by one of two procedures. If a Federal agency is involved with the permitting, funding, or carrying out of the project and a listed species is going to be adversely affected, then initiation of formal consultation between that agency and the Service pursuant to section 7 of the Act is required. Such consultation would result in a biological opinion addressing the anticipated effects of the project to the listed species and may authorize a limited level of incidental take. If a Federal agency is not involved in the project, and federally listed species may be taken as part of the project, then an incidental take

<p>Mr. Howell Chan</p> <p>permit pursuant to section 10(a)(1)(B) of the Act should be obtained. The Service may issue such a permit upon completion of a satisfactory conservation plan for the listed species that would be taken by the project. Since Caltrans has been delegated authority from the Federal Highways Administration, section 7 is the most appropriate process for this project.</p>	<p>16-2 cont.</p>
<p>Our specific comments and recommendations on the DEIR are as follows:</p>	
<p>1. Avoidance, Minimization, and/or Mitigation Measures. We concur with the DEIR that the Interstate 80/Interstate 680/State Route 12 Interchange Project, as proposed, may affect the vernal pool fairy shrimp, vernal pool tadpole shrimp, callippe silverspot butterfly, valley elderberry longhorn beetle, and California red-legged frog. The proposed project likely will affect the critical habitat for the California red-legged frog and the Contra Costa goldfields. Throughout the Biology Section in the DEIR, it is stated that the implementation of avoidance, minimization, and/or mitigation measures will “ensure” that the proposed project will not result in adverse effects to the listed species. For the majority of the biological resources, the proposed measures may result in minimization of adverse effects, however, they are unlikely to ensure they will not occur, or eliminate the potential for them. Therefore, we recommend Caltrans obtain authorization for incidental take of the appropriate listed species via section 7 of the Act prior to certification of the final environmental document. If the Service authorizes incidental take for these listed animals, we recommend the Caltrans incorporate the <i>Conservation Measures</i> and <i>Reasonable and Prudent Measures</i> from the biological opinion into the appropriate permits and contracts.</p>	<p>16-3</p>
<p>2. Definition of Temporary Effects. We were unable to locate the definition of “temporary effects” in the DEIR. In regards to listed species, “temporary effect” is defined as habitat disturbed by the project that will be restored to baseline or higher habitat values within one year of the initial disturbance.</p>	<p>16-4</p>
<p>3. Definition of Action Area: Action area is defined at 50 CFR 402.02, as all areas to affected directly or indirectly by the Federal action and not merely the immediate area involved in the action.</p>	<p>16-5</p>
<p>4. Accessibility to Study Area during Assessment. Portions of the proposed project area are apparently located outside the existing transportation right-of-way. We were unable to find a discussion of the limitations of the studies and analyses in the DEIR. We request clarification as to whether there were areas that were inaccessible that necessitate investigation following eventual access, including protocol surveys. It is our understanding that some areas, such as the Mangels’ property, were accessible for a limited time, however, protocol surveys for the callippe silverspot, showy Indian clover, and other listed species in these areas currently are incomplete.</p>	<p>16-6</p>
<p>5. California Tiger Salamander. Based on the available information, we do not concur that the study is outside of the range of the California tiger salamander (Page 3.3-117 of the DEIR). We recommend that a site assessment and, if appropriate, a survey for this</p>	<p>16-7</p>

Mr. Howell Chan

animal, be completed following the *Interim Guidance on Site Assessment and Field Surveys for Determining Presence or a Negative Finding of the California Tiger Salamander* dated October 2003 that was prepared by the Service and the California Department of Fish and Game. Special attention should be given to the State Route 12 area east of Interstate Highway 80.

16-7
cont.

6. Showy Indian Clover. We recommend that a survey for the showy Indian clover be completed in the action area following *Protocols for Conducting and Reporting Botanical Inventories for Federally Listed, Proposed, and Candidate Plants* dated September 23, 1996, that was prepared by the Sacramento Fish and Wildlife Office, and *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* dated November 24, 2009, that was prepared by the California Department of Fish and Game. Survey results generally are valid for two (2) calendar years after the date of their completion. The written results of the protocol survey should be provided to the Service and the California Department of Fish and Game for review and approval.

16-8

7. Contra Costa Goldfields. The DEIR notes Contra Costa goldfields is an annual plant species whose germination can vary from year to year. Therefore, the amount of potential habitat that may harbor the seed bed for this endangered species within the action area is a more accurate method of analyzing the effects to Contra goldfields, rather than on the acres of critical habitat within the propose project or the number of individual plants found in a given year. In addition, we have concerns regarding the proposed mitigation of salvaging and transplanting individual Contra Costa goldfields. We recommend that the issue regarding the Contra Costa goldfields and its designated critical habitat be resolved prior to certification of the final environmental documents.

16-9

8. Callippe Silverspot Butterfly. Based on the discussion provided in the DEIR the effects analysis for the callippe silverspot butterfly this endangered animal is incomplete. Two populations of its food plant, johnny jump-up (*Viola pedunculata*) were identified in 2004, but it is unclear if and when larval and adult butterfly surveys were completed. The survey report on this endangered animal described in the DEIR should be provided to the Service and the California Department of Fish and Game for review. The discussion in the DEIR is limited to the location of the larval food plant. During the early summer flight season, the adult females lay their eggs on the undersides of leaves and stems of johnny jump-up or in the vicinity of these plants. Adult callippe silverspot butterflies frequently engage in hilltopping, which is a behavior where adults congregate on hilltops or ridgelines for the purpose of locating mates. Hilltops and ridges play an important role in callippe breeding behavior, and these geographic features are often located away from the larvae foodplants. Losing hilltops and ridgelines from habitat areas likely decreases the ability of the animals to locate mates and likely reduces genetic diversity over the long-term. The proposed extension of Redtop Road bisects the two identified host plant populations. The potential effects associated with fragmenting these two host plant populations should be included in the analysis in the environmental documents. The 2004 surveys for the host plant described in the DEIR are outdated and an adequate

16-10

Mr. Howell Chan

survey should be completed prior to initiation of section 7 consultation. Survey results for the larval foodplant generally are valid for two (2) calendar years after the date of their completion. We also recommend that the final environmental document include an adequate discussion of the effects of the loss or reduction in hilltop and ridgeline breeding habitat.

16-10
cont.

9. Valley Elderberry Longhorn Beetle. The DEIR states that no exit holes were observed in any elderberry stems measuring 1.0 inch or more in diameter at ground level within the project area. However, Table 3.3.5-5 states that at least two elderberry shrubs (*Sambucus* species) did have exit holes.

16-11

10. California Red-Legged Frog. The California red-legged frog should have been listed on page 3.3-38 in the DEIR as one of the special-status animal species that have been observed in the study area. On page 3.3-41 it states that preconstruction surveys for western pond turtle (*Actinemys marmorata*) will be conducted immediately preceding construction activities in the creeks and near ponds. Creeks and ponds near the construction areas may also be habitat for California red-legged frogs. Information should be provided on the location of aquatic features that could support turtles and red-legged frogs.

16-12

16-13

On page 3.3-86 of the DEIR states that there were wetlands within the project area that were too shallow to provide aquatic habitat for the California red-legged frog. We assume that this is a reference to using aquatic habitat for breeding. Aquatic habitat that is too shallow for breeding can still be utilized by frogs for foraging, resting, and other essential behaviors. Annual rainfall in California is highly variable such that aquatic habitat can be suitable for successful breeding in one year but not the next.

16-14

11. The DEIR stated that that the extension of Redtop Road is likely to have substantial effects on the California red-legged frog and critical habitat unit SOL-2. Although we have not seen a design profile for the road, based on the large construction footprint we assume that Caltrans/STA plan to create an even road profile by constructing a major road cut through the Mangels' property. This design will likely result in significant fragmentation of the landscape and ecosystem functions. It appears that the majority of the approximately 1.3-mile road segment from Business Center Drive to State Route 12 and then south to Interstate 80 will be bordered by road cuts that limit the potential for movement of this listed amphibian or incorporation of culverts or passages across the road. The large undercrossing that will be designed for cattle that was described in the DEIR likely will provide an adequate safe crossing for a portion of the number of California red-legged frogs that likely are moving to and from the breeding pond on the Mangels' property. However, limiting the crossing to one site likely will have adverse effects on the continued ability of the primary constituent elements to function in this portion of California red-legged frog critical habitat unit SOL-2. The Mangels' pond likely is one of the primary breeding sites for this critical habitat unit and we are concerned that the project, as currently proposed, likely will isolate or reduce access to it. In addition, State Route 12 represents an existing challenge for California red-legged

16-15

Mr. Howell Chan

frogs to access summer aestivation and forage habitat within Jameson Canyon Creek. A key conservation need for the Jameson Canyon Lower Napa River Core Recovery Area is to protect these dispersal corridors (Service 2002). Planned infrastructure changes to State Route 12 likely will exacerbate the barrier effects as the roadway is widened and median barriers are installed. State Route 12 through Jameson Canyon imperils the connectivity between critical habitat units SOL-1, SOL-2, and SOL-3.

16-15
cont.

12. The DEIR does not include specific information regarding how, where, and when habitat compensation for the California red-legged frog, vernal pool fairy shrimp, vernal pool tadpole shrimp will be achieved. We recommend that compensation be located as close to the action area as possible. All lands conserved should be permanently protected under a conservation easement, management plan, and an endowment based on the results of a property analysis record (PAR), all three of which have been approved by the Service and the California Department of Fish and Game prior to groundbreaking at the project.

16-16

13. The on-going loss and reduction in natural habitat for listed species and wildlife in this portion of Solano County and southern Napa County is of concern to the Service. The proposed project will reduce habitat in the Cordelia Hills for the California red-legged frog, and wildlife, including black-tailed deer (*Odocoileus hemionus*), bobcat (*Lynx rufus*), gray fox (*Urocyon cinereoargenteus*), and possibly American badger (*Taxidea taxus*) and also reduce or possibly eliminate their ability to move between the Coast Range. Much of the Cordelia Hills and associated Coast Range are undeveloped, however, the proposed Interstate 80/Interstate 680/State Route 12 Interchange Project, coupled with other planned and recently completed transportation and urban projects and conversion of grassland to vineyards will continue the reduction and loss of wildlife corridors, as well as fragmentation of natural habitat. The elimination of the availability of natural habitat likely will eliminate or decrease the ability of the California red-legged frog, Callippe silverspot butterfly, and wildlife, especially medium to large sized animals, to survive in the Cordelia Hills over the long term because they likely will be adversely affected by increased fragmentation caused by urban development and roadway construction and improvements, increased mortality from vehicles, predators, lack of cover, resting areas, forage, genetic problems, mortality resulting from predation by domestic cats (*Felis domesticus*) and dogs (*Canis lupus familiaris*), and other human-caused factors. To deal with these indirect and cumulative adverse effects from various projects and actions, and based on the Wildlife Crossing meeting that was held by Caltrans, California Department of Fish and Game, and the Service on October 13, 2010, this area of Solano and Napa counties may be the appropriate location to identify wildlife crossings for enhancement and protection.

16-17

14. Wildlife Fencing. The final environmental document should include a discussion of fencing that can be constructed at the project to prevent access to the highway by listed species and wildlife, as well as direct them to locations and structures where they may safely cross the roadway.

16-18

Mr. Howell Chan

Though the intent of wildlife culverts and crossings are to ensure safe passage of listed species and wildlife, they are also a benefit to human safety. Deer-automobile collisions, estimated by the Insurance Information Institute to occur at a rate of 500,000 per year, result in over \$1 billion worth of vehicular damages, 29,000 human injuries, and 200 human fatalities each year (Cornell University 2007). Culverts large enough to accommodate species such as deer (*Odocoileus* species) and mountain lion, while maintaining substrates for the California red-legged frog and smaller wildlife, could reduce roadway collisions for a variety of species. For example, wildlife crossings of the Trans-Canada Highway in Canada's Banff National Park have reduced wildlife road mortality by 80%, and as much as 96% for ungulates (Robbins 2003).

16-18
cont.

15. The construction of the roadway from Business Center Drive to Redtop Road likely will isolate a breeding pond for the California red-legged frog, and an important source of drinking water in this area for medium- and large-sized native mammals. We recommend that there be at least two large undercrossings in addition to the one currently planned for cattle, as well as appropriately designed culverts on this portion of the project that will allow access to this critical resource by these species.

16-19

We are interested in working with Caltrans and STA in the resolution of the issues regarding endangered species and wildlife. Please contact John Cleckler or Chris Nagano at the letterhead address, via electronic mail (John_Cleckler@fws.gov; Chris_Nagano@fws.gov), or at telephone 916/414-6600 if you have any questions regarding this response on the DEIR for the Interstate 80/Interstate 680/State Route 12 Interchange Project.

Sincerely,


Cay C. Goude
Assistant Field Supervisor
Endangered Species Program

cc:

Scott Wilson, Greg Martinelli, Melissa Escaron, California Department of Fish and Game,
Yountville, California

Jolanta Uchman, State Water Resources Control Board, Oakland, California

Janet Adams, Solano Transportation Authority, Suisun City, California

Zachary Gifford and Ahmad Hashemi, California Department of Transportation, Oakland,
California

Lisa Webber, Stephanie Myers, and Shahira Ashkar, ICF Jones & Stokes, Sacramento, California

Mr. Howell Chan

Literature Cited

Cornell University. 2007. Management of Wildlife Damage in Suburban and Rural Landscapes. <http://wildlifecontrol.info/ne1005>. Accessed December 2007.

Robbins, E. 2003. No More Road Kill: What it takes to make highways friendly to animals. Planning. February 2003, Volume. 69, No. 2, pages 33-34.

U. S. Fish and Wildlife Service. 2002. Recovery Plan for the California Red-legged Frog (*Rana aurora draytonii*). Portland, Oregon. viii + 173 pp.

Comment Letter 16, Cay C. Goude, Assistant Field Supervisor, Endangered Species Program, United States Department of the Interior, Fish and Wildlife Service, 10/18/10

Response to Comment 16-1

Comment noted.

Response to Comment 16-2

Comment noted.

Response to Comment 16-3

The Department has obtained incidental take authorization for the following species: callippe silverspot butterfly, vernal pool fairy shrimp, vernal pool tadpole shrimp, valley elderberry longhorn beetle, and California red-legged frog. The Biological Opinion was issued on April 16, 2012.

Furthermore, the text has been revised in Section 3.3.4 of the Final EIR/EIS to remove the word “ensure” in this context. Instead the document now reads:

“Implementation of...will reduce the project’s effect on....”

Response to Comment 16-4

A definition of temporary impacts has been provided on the first page of Section 3.3 of the Final EIR/EIS.

Response to Comment 16-5

“Action area” is a term used in the Biological Assessment and Biological Opinion. It is concurrent with the Biological Study Area, which is defined in Section 3.3 of the Final EIR/EIS.

Response to Comment 16-6

A discussion of methods, explaining the study limitations for each study has been added to the Affected Environment sections of Section 3.3 in the Final EIR/EIS. This discussion also addresses whether preconstruction surveys are to be conducted or presence is to be inferred, as appropriate.

Response to Comment 16-7

The Department coordinated with USFWS and DFG to determine project effects on California tiger salamander. A discussion of California tiger salamander was added to the Final EIR/EIS as Section 3.3.5.7. The USFWS concurred with a "not likely to adversely affect" determination for CTS in the BO dated April 16, 2012.

Response to Comment 16-8

An avoidance, minimization and/or mitigation measures discussion has been added to the Final EIR/EIS as Section 3.3.5.2 that requires preconstruction surveys for showy Indian clover in locations of the project area where access is currently prohibited and submittal of survey results to the USFWS and DFG.

Response to Comment 16-9

The discussion of mitigation for Contra Costa Goldfields in Section 3.3 of the Final EIR/EIS has been revised to reflect impacts and mitigation based on potential habitat in the project area (seasonal wetland and alkali seasonal marsh) that could support a seed bed for the goldfields. In addition, mitigation for impacts under two alternatives (C and C, Phase 1) now includes modification of the project design to include a retaining wall that will avoid direct impacts on potential Contra Costa goldfield habitat south of SR 12E. The Biological Opinion (BO) was issued on April 16, 2012, and measures in the BO have been incorporated into the Final EIR/EIS, including the retaining wall south of SR 12E, fencing and monitoring requirements, seasonal construction timing, and compensation under Alternatives B and C.

Response to Comment 16-10

No surveys were conducted for callippe silverspot butterfly during the project because the habitat area was not accessible. The previous study (Monk & Associates 2004) that is cited also did not include larval and adult surveys. The Final EIR/EIS has been revised to clarify that biological staff did not have access to the property (Section 3.3.5.3). USFWS issued a BO on April 16, 2012 including a final determination of project effects on callippe silverspot butterfly and its habitat and appropriate conservation and mitigation measures. The effects include the temporary and permanent loss of hilltop and larval host plant habitat and ridgeline breeding habitat, as well as harm and harassment and habitat fragmentation. Measures to avoid and minimize and compensate for these effects in the BO have been incorporated into the Final EIR/EIS and include surveys to identify larval host plants; fencing, construction timing and method requirements; and restoration, revegetation, and compensation.

Response to Comment 16-11

The table is correct. The sentence stating that there are no exit holes has been deleted from the Final EIR/EIS.

Response to Comment 16-12

California red-legged frog has been added to the discussion in the Final EIR/EIS. The sentence in Section 3.3.4 of the Final EIR/EIS reads:

“Four of the 18 special-status wildlife species that could occur in the study area (California red-legged frog, burrowing owl, northern harrier, and western pond turtle) have been observed in the study area.”

Response to Comment 16-13

Though western pond turtle and CRLF do share some of the same habitats, these species are not discussed in the same section because CRLF is a threatened and endangered species and western pond turtle is not. In keeping with the outline of the document, CRLF habitat is addressed in Section 3.3.5, Threatened and Endangered Species. The same habitats, ponds and creeks, as well as upland habitat, were identified as suitable for both species. Text in Sections 3.3.4.1 and 3.3.5.6 of the FEIR/EIS has been changed to indicate shared habitat.

Response to Comment 16-14

The following sentence was added to the Affected Environment discussion in Section 3.3.5.6.

“Aquatic habitat includes creeks, ponds, marshes, and seasonal drainages that may not all be suitable for breeding but may be used for other essential activities including foraging, dispersing, and cover.”

Response to Comment 16-15

Comment noted.

The Department and STA will provide several design features that will facilitate habitat connectivity and passage for CRLFs dispersing west from the Mangels pond over the Business Center Drive Extension (BCDE) and out into designated critical habitat. These design features are listed below and have been added to the FEIR/EIS under the Avoidance, Minimization and/or Mitigation heading in Section 3.3.5.6.

- A large 12- by 8-foot concrete box culvert at Jameson Canyon Creek crossing of OW-8 located at I-80.
- A free span bridge over Jameson Canyon Creek at OW-8a, OW-8b, and the SPRR west of the Red Top Road intersection.
- An oversized culvert (60 inches in diameter) for OW-161, with a natural substrate (dirt or gravel) over which wildlife can travel. At least two large span style undercrossings along the BCDE in the vicinity of the seasonal drainage (OW-145) north of Mangels pond, and near W-187, suitable for cattle and farm vehicles to cross under the BCDE that connects the I-80/Red Top Road interchange to Business Center Drive.
- Approximately 2.5 miles of directional fencing (Figure 4-5) to guide CRLF to the undercrossing locations along the BCDE. The fencing will consist of hard plastic or a combination of permanent hardware cloth and flashing with a lip on it, or similar material and design. Directional fencing will be attached to the newly installed ROW fence on both sides of the new highway constructed between Business Center Drive and I-80 (Figure 4-5). The fence will be constructed along Business Center Drive, which is a local road off the state highway system, and its long-term maintenance will be the responsibility of STA.

Response to Comment 16-16

The Department and STA are consulting with the Solano Land Trust, property owners, and USFWS to identify mitigation/compensation areas as close as possible to the action area and devise a mitigation/compensation plan. The Department and STA agree that mitigation should be addressed prior to groundbreaking for the project. In some cases (for instance, vernal pool fairy shrimp), mitigation banking may be an option due to lack of suitable areas.

Response to Comment 16-17

See response to comment 16-15. The Department and STA are providing several undercrossings suitable for larger wildlife species as well as for CRLF.

Response to Comment 16-18

A measure to “Incorporate Design Features to Minimize Indirect Effects from New Road Construction that was developed in coordination with USFWS” has been added to the Final EIR/EIS in Section 3.3.5.6. This measure is intended to reduce road related mortality for wildlife species.

Response to Comment 16-19

Two large under-crossings and one culvert along the new road connecting Red Top Road and Business Center Drive are possible from an engineering perspective and will be incorporated into the project. The under-crossings will be approximately 14-feet high and will be able to accommodate cattle as well as wildlife. The culvert will lead to a drainage with CRLF. The fact that the road in this location is in a cut section precludes the use of additional culverts or tunnels for frogs. This information has been added to the Final EIR/EIS beginning in Section 3.3.5.6.



CITY OF FAIRFIELD

Founded 1856

Letter 17

Incorporated December 12, 1903

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October 11, 2010

CALTRANS DISTRICT 4
Attn: Howell Chan
Environmental Analysis Office Chief
P.O. Box 23660, MS 8-B
Oakland, CA 94623-0660

Re: I-80/I-680/SR 12 Draft Environmental Impact Statement/Environmental Impact Report

Dear Mr. Chan:

The City of Fairfield has reviewed the **I-80/I-680/SR 12 Draft Environmental Impact Statement/Environmental Impact Report (DEIS/EIR)**. Thank you for the opportunity to review and comment on this document.

The City strongly supports the proposed interchange project addressed in this combined environmental document. The City's preferred alternative is Alternative C, which we believe will minimize negative impacts on the City of Fairfield and will help address the serious traffic congestion issues now facing the community.

17-1

Overall, the DEIS/EIR appears to adequately analyze and address the environmental issues associated with a project of this scope. The City does however have concerns about relocation of businesses in the City of Fairfield and of mitigation of noise impacts, as well as a few other corrections and comments which the City believes should be addressed in the final EIS/EIR. Please feel free to call Brian Miller at 707-428-7446 or myself at 707-428-7485 if you have any questions.

17-2

Sincerely,

GEORGE R. HICKS
Public Works Director

ELB:GRH:BKM:ccs

c: Fred Beiner, Erin Beavers, Wayne Lewis, Garland Wong, Brian Miller

City of Fairfield Comments: DEIS/EIR

2-7 Project Alternatives-Water Line Relocation

The DEIR/EIS states that the project will result in the relocation of water lines, including lines owned by the City of Fairfield. Due to the scope and complexity of the project, we realize that the extent of the relocations is not fully known at this time. The City is concerned about potential impacts to our customers related to these future relocations and asks that CALTRANS coordinate closely with the City and require that shutdowns and other service interruptions be disallowed where practical or minimized to the greatest extent practicable to avoid significant impacts to the City's water customers.

17-3

3.1.4 Relocation and Property Impacts

CALTRANS assumes that any take less than 50% of a parcel's area constitutes a "partial take" which may not in all cases require relocation. However, even partial takes can eliminate necessary parking, vehicle storage, outdoor storage, and access to the site. We would like confirmation that this issue will be addressed during right-of-way negotiations and that property and business owners will be fully compensated for impacts to their property resulting from the project.

17-4

The City is also concerned about the assumption that the availability of vacant commercial and industrial land in the vicinity of the project or Fairfield/Suisun more generally will reduce or eliminate impacts. Displaced businesses may not find relocation possible or easy in a manner which avoids serious disruption to the business or the local economy. The City of Fairfield requests that Fairfield businesses displaced by the project be relocated within the City of Fairfield to the extent feasible to reduce impacts to the local economy.

17-5

3.1.6-13 Transportation-Construction Impacts

We request that CALTRANS work closely with the City to minimize impacts on local streets during construction of the project in 2015. We are particularly concerned about traffic congestion from staging of the project and timing/location of street closures.

17-6

3.1.6-38 Transportation-Intersection Improvements

It is indicated that the project will include coordination with the City to design and construct intersection improvements. The City requests that CALTRANS work closely with the City during design and project design to ensure that impacts to local streets are minimized and that proposed local roadway and intersection improvements are feasible and meet City standards

17-7

3.1.6 Transportation/Bicycle/Pedestrian Facilities

- Lopes Road Bicycle Lanes. The Class II Bicycle Lanes on Lopes Road between Cordelia Road and Gold Hill Road are intermittent. The segment nearest Cordelia Road lacks bicycle lanes entirely and it is unlikely the current right of way would permit bicycle lanes along the full length of Lopes Road. 17-8
- Lopes Road Bicycle Path. There is no completed bicycle path connecting Lopes Road and Watt Drive. There exists one short dead end segment of paved bicycle path connected to Lopes Road. 17-9
- Transit Service Typo. Page 204: Under “Transit Service” a typographical error references “Sacramento Regional Transit Service”. 17-10
- LOS E Definition. On Page 3.1.6-2 – Paragraph 3, Line 3, the text indicates that “LOS E...” means roadways are “at capacity” while Table 3.1.6-2 indicates that LOS E is defined as “approaching capacity”. Please clarify. 17-11
- Pittman Road. Page 3.1.6-4 – Existing (2004) Traffic Operations bullet point five should mention Pittman Road as well. 17-12

3.1.7 Visual and Aesthetic Resources

The DEIR/EIS should reference the Communities Gateways design concepts outlined in the adopted Fairfield Gateways Implementation Plan. The design concepts include tree planting plan, native plant palette, monument signage, and other elements designed to announce entry into the City of Fairfield. In addition, STA has undertaken a planning effort for the I80 corridor which addresses community design and gateway issues. CALTRANS should confirm that it will work with the City to incorporate design features identified in these planning documents as feasible. 17-13

3.1.7-15 Visual Mitigation Measures

The project will have impacts on landscaping and other visual features, with the specifics determined as project design is finalized. It is indicated that landscaping removed shall be replaced to ensure a less than significant visual character impact. CALTRANS should confirm that they will work with the City to minimize loss of visually significant landscaping with a focus on developing a visually attractive freeway corridor. 17-14

3.1.8 Air Quality

Page 421. The DEIS/EIR refers to “modify(ing) local zoning and develop(ing) guidelines to separate emissions from sensitive receptors” as one mechanism for minimizing impacts from MSAT and other pollutants. The City of Fairfield has entered into a development agreement with one major local property owner that restricts the City’s ability to rezone property without the active consent of the property owner. In addition, much of the corridor is already developed with homes and businesses. The opportunity to implement zoning changes is therefore limited in portions of the project area. 17-15

3.2.7 Noise Impacts

The DEIS/EIR analysis uses federal Noise Abatement Criteria (NAC) standards to determine if there is a significant impact that must be mitigated. These standards differ from City of Fairfield noise standards. For residential uses, the Fairfield Noise Ordinance limits outdoor noise to 60 dB CNEL. This can be compared to the quite higher NAC standard of 67 dB. Given that existing noise levels exceed City of Fairfield standards and approach NAC standards in many cases, we are concerned that CALTRANS is not incorporating significant efforts to reduce noise impacts on City of Fairfield residential neighborhoods, even when said efforts would be more expensive than the Caltrans standard. 17-16

Many of the sites selected for noise studies by CALTRANS already exceed City of Fairfield standards for noise sensitive residential and motel/hotel (transient residential) land uses. Sites in Subarea H also exceed the CALTRANS NAC standard for residential land uses. 17-17

While the height and cost of new noise barriers may be prohibitive, we are concerned that the project will not effectively address new noise impacts created by the facility. It is indicated that the feasibility of sound barriers is not clear at this time, yet no additional mitigation measures are provided to reduce any noise impact that exceeds significance criteria. The City requests that CALTRANS propose mechanisms to meet the City's noise ordinance standards. 17-18

Bay Ridge Trail

The DEIS/EIR should reference the planning underway for a Bay Area Ridge Trail alignments in the project area. While trails are not currently officially designated by the City of Fairfield, Solano County, or CALTRANS, Bay Area Ridge Trail connections across Highway 12 are currently under study by the Solano Transportation Authority. 17-19

Comment Letter 17, George R. Hicks, Public Works Director, City of Fairfield, Public Works Department, 10/11/10

Response to Comment 17-1

Comment noted.

Response to Comment 17-2

Comment noted. Please see responses to comments 17-4, 17-5, 17-16, 17-17, and 17-18.

Response to Comment 17-3

The Department is committed to working closely with the City to ensure that the disruption to water supply and other utilities is avoided or minimized. This commitment is noted in Sections 3.1.5 of the Draft EIR/EIS and 3.1.5 of the Final EIR/EIS. No changes were made to the Final EIR/EIS.

Response to Comment 17-4

The assumptions used in the Draft EIR/EIS regarding displacement of property were used to provide a consistent comparison between alternatives. During the final design and right-of-way negotiation process a more exhaustive assessment of specific impacts to each property including affects on parking, storage and access will be undertaken. Property owners will be compensated in full accordance with Public Law 91-646, the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended.

Response to Comment 17-5

The text in Section 3.1.4 of the Final EIR/EIS is amended as follows:

“To the extent feasible, Fairfield businesses displaced by the project will be relocated within the city of Fairfield. Because the proposed project would provide for the equitable relocation of occupants and businesses, and there are sufficient commercial opportunities and available land in the area for the relocation of businesses and industry, no avoidance, minimization, and/or mitigation measures would be required.”

Response to Comment 17-6

The Department is committed to working with the City to minimize impacts on local streets during construction. This commitment is reflected in the avoidance and minimization measure to prepare a Transportation Management Plan in Sections 3.1.5 and 3.1.6 of the Final EIR/EIS.

Response to Comment 17-7

The Department is committed to coordinating with the City of Fairfield, as well as other local agencies, in the design and construction of intersection improvements, as stated in Sections 3.1.6 of the Draft EIR/EIS and Section 3.1.6 of the Final EIR/EIS.

Response to Comment 17-8

The list of Class II Bicycle Lanes in Section 3.1.6 of the Final EIR/EIS has been updated to show that Lopes Road only has bicycle lanes between Gold Hill Road and Red Top Road.

Response to Comment 17-9

The connection between Lopes Road and Watt Drive is paved on the eastern half and unpaved on the western half; however, it is an off-street path that bicycles are permitted to use. Therefore, it is considered a Class I Multi-Use path, and the list of Class I Multi-Use Paths shown in Section 3.1.6 of the Draft and Final EIR/EIS will remain unchanged.

Response to Comment 17-10

The Final EIR/EIS has been corrected.

Response to Comment 17-11

LOS E, in the context of freeway analysis, represents at-capacity operations per Department standard practice. In the context of intersection analysis, LOS E represents operations as they approach capacity. The text in Section 3.1.6 of the Final EIR/EIS has been updated to note that the LOS E referred to is for the freeway analysis.

Response to Comment 17-12

Pittman Road has been added to the list of local roadways studied in Section 3.1.6 of the Final EIR/EIS.

Response to Comment 17-13

The avoidance, minimization and/or mitigation measures in Section 3.1.7 states that project features such as sound walls, overpass structures, landscaping, and other freeway-related structures will be consistent with the corridor aesthetic recommendations for the I-80 corridor being prepared by the STA. The recommendations being prepared by STA are being coordinated with the Cities along the corridor to address community design and gateway issues and therefore should address the commenter's concern.

Response to Comment 17-14

The text in Section 3.1.7 of the Final EIR/EIS under "Replace landscaping as appropriate" is revised as follows:

"The Department will replace highway planting within the project limits per policy. The Department will work with the City of Fairfield during development of highway planting plans."

Response to Comment 17-15

Comment noted. Comment refers to text in Section 3.2.6 of the Draft EIR/EIS and Final EIR/EIS.

This is one of several measures to reduce MSAT emissions that will be reviewed for their practicality and efficacy. The Department does not rely on land use changes alone to minimize air quality impacts.

Response to Comment 17-16

For federally funded projects such as the I-80/I-680/SR 12 Interchange Improvement project, noise studies are required to conform to traffic noise standards specified in 23CFR772 and the Department's protocol. Noise abatement criteria outlined in 23CFR772 and the Protocol were

used to identify traffic noise impacts and to determine whether noise abatement must be considered for noise sensitive locations within the project study area. The study conducted for the project conformed to these standards. In addition, potential noise impacts under CEQA criteria were also considered and discussed in Chapter 4, Section 4.1.2.10.

Response to Comment 17-17

Comment noted. Because the I-80/I-680/SR 12 Interchange Improvement project is federally funded with Department oversight it is required to conform to the noise analysis requirements and standards specified in 23CFR772 and the Department's Protocol. The commenter is correct that in many cases traffic noise levels at noise sensitive locations studied in the Draft EIR/EIS either already exceed or would likely exceed outdoor noise limits specified in the City of Fairfield ordinance. Noise analyses were performed according to the Department's protocol and standards specified in 23CFR772, as required for federally funded projects. In addition, potential noise impacts under CEQA criteria were also considered and discussed in Chapter 4, Section 4.1.2.10. 23CFR772 and the Department's Protocol require that noise abatement be considered in areas where traffic noise impacts are predicted (i.e. where traffic noise levels approach or exceed noise abatement criteria specified in the Protocol). There are locations where the noise abatement criteria are predicted to be exceeded and noise abatement has been considered as required.

Response to Comment 17-18

For reasons discussed in response to comment 17-17 City noise standards are not applied to this project. However the Department did evaluate potential noise impacts under CEQA criteria in Chapter 4, Section 4.1.2.10. Under 23CFR772 and the Department's Protocol, residential areas that contain areas of outdoor frequent human use (backyards) are eligible for noise abatement evaluation where traffic noise levels approach or exceed the NAC for a given land use (Activity Category B for residential receivers). Noise barriers are generally indicated as the standard and most effective form of noise abatement, because of the noise reduction that can be achieved for outdoor areas at multiple first- and second-row receivers. Other forms of noise abatement may be considered where severe noise impacts are predicted, such as noise sensitive locations where traffic noise levels exceed 75 dBA L_{eq} . In such cases, residences may be considered for other forms of noise abatement such as improved building sound insulation on a case-by-case basis if barriers are not reasonable and feasible. However, noise abatement techniques such as soundproofing residences do not address exterior noise levels and may not result in a minimum 5 dB of noise reduction in all cases. Therefore noise insulation has not been evaluated as a form of noise abatement for this project. Federal funds may be used to construct soundwalls that are reasonable and feasible. Non-federal funds may be used for noise abatement when federal funds are restricted.

Response to Comment 17-19

The Bay Area Ridge Trail is addressed in the Draft and Final EIR/EIS in Appendix B on pages B-8 and B-9. The discussion of the Bay Area Ridge Trail has been updated in Sections 3.1.1.3 and B.1.1.1 of the Final EIR/EIS. Also see responses to comments 14-4 and 14-5.

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JAEGER McHUGH & COMPANY, LLC

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Office: (415) 433-3281 Fax: (415) 433-6529

Letter 18

October 15, 2010

Caltrans, District 4
Attn: Howell Chan
Environmental Analysis Office Chief
P.O. Box 23660, MS-8B
Oakland, CA 94623-0660

Dear Mr. Chan,

Thank you for taking the time to arrange for us to meet with Caltrans, STA and consultant staff on Thursday October 7, 2010 at the Caltrans District 4 office. The purpose of the meeting was to review the Draft Environmental Impact Report/ Environmental Impact Statement for the Interstate 80/Interstate 680/State Route 12 Interchange Project and register our strong objection to the choice of Alternative C as the preferred alternative.

As indicated in the meeting, 495, 497 & 499 Edison Court ("Edison Court"), a property that we manage on behalf of local individual investors, all of whom are retirees, will be dramatically and adversely impacted by the choice of Alternative C, a full realignment of I-680 through the heart of the Cordelia Industrial Park.

18-1

These local investors acquired Edison Court (along with Jaeger McHugh & Co) in 2007, due to its unique location between I-80, I-680 and SR 12. Their goal is to renovate and reposition it as a premier multi-tenant facility in Solano County that would ultimately provide stable income, long term value appreciation and a hedge against inflation. Toward that goal, management has already invested significant additional capital to renovate over 90% of the interiors of the uniquely high clear height suites as leases have rolled, replaced all three roofs with new Title 24 compliant roof systems under warranty, completely stripped to the backing rod and repainted all three buildings with high quality elastomeric paint, and added site amenities such as lighting and docks.

While we fully support progress in all its forms for the County and State, we cannot allow the ownership of Edison Court to be forced to prematurely sell its long-term investment at a loss in today's uniquely depressed economic climate for the benefit of the State. The investors of Edison Court have an average age over seventy years. Each has worked hard over their lives and deserves their retirement. Many rely on their Edison Court investment for long-term security and income during their retirement years. A loss could result in a major and, in some cases, life threatening impact.

18-2

In reviewing the EIR report, we found several inconsistencies in the details that should have favored Alternative B as the preferred alternative. We fear that the EIR report is not

18-3

JAEGER McHUGH & COMPANY, LLC

■ 500 Washington Street, Suite 450, San Francisco 94111 ■
Office: (415) 433-3281 Fax: (415) 433-6529

an accurate reflection of the true environmental impacts of both alternatives, and especially an accurate reflection of the amount of destruction that would result in the choice of Alternative C, a complete realignment of an interstate through an existing community that, and as a result, would surely be forced to bear the brunt of its impact. For example, the new interchange alignment is to be located within ten feet of the Angelo Rodriguez High School.

18-3
cont.

18-4

In reviewing the traffic impact of both alternatives, in Table S-1, by 2035, the ultimate impact of reduced Vehicle Hour Delays (VHD) for Phase 1 will be down 100% for am peak hours and 47% for pm peak hours in Alternative B, but only down 18% for am peak hours and 16% for pm peak hours in Alternative C. Further the duration of congestion is greater under Alternative C. Since Phase 1 of both alternatives represents the main difference between them (either expansion of an existing right of way or realignment to construct an entirely new interchange), we are not sure how the overall conclusion, as rated in the final measure of effectiveness (MOE) that relates to travel times and reducing traffic, can be rated as the same for both alternatives.

18-5

In reviewing the construction cost estimates, in Table 2-4, the estimate of final costs of Alternative B (a widening of the existing right of way) are actually greater than that of Alternative C (an acquisition of an entirely new right of way and construction of an entirely new interchange for realignment). In the detail of construction costs in Phase 1, the entirely new interchange in Alternative C results in only a \$56 million additional construction charge over Alternative B. This cost estimate does not seem accurate, especially since the new interchange will be constructed directly over the Green Valley fault line (last earthquake of 6.7 magnitude).

18-6

Further, the additional right of way costs for the new interchange alignment of Alternative C results in only a \$34 million additional charge over Alternative B. This cost estimate does not seem accurate. The new right of way acquisition for Alternative C will result in the complete acquisition and demolition of at least eleven fully developed industrial buildings in the park, many brand new or fully renovated structures, totaling at least 500,000 square feet, not to mention 'partial' land takings of fully developed sites, and 'full' or 'partial' takings of undeveloped land within the park or nearby. The right of way detail found in Appendix 1 – Property Impacts lists all parcels except one property as a 'partial' taking.

18-7

Finally, the lower overall costs for Alternative C are only realized in the final phase of the project (by 2035), principally in lower costs for roadway items. It is unclear what these savings would be as there is no detail. We do not believe the construction costs for the new interchange (as well as its entirely new right of way) have been accurately estimated. As a result, those faced with condemnation by Alternative C will very likely be forced to make up of the difference, by selling to the State at fire sale values when the hard costs of this new interchange ultimately come in higher than estimated, which they surely will.

18-8

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In our meeting on October 7th, our understanding is that Caltrans, STA staff and consultants all reconfirmed that under Alternative C, Edison Court would be a 'full' taking, rather than 'partial' taking as listed in Appendix 1. In addition, it was confirmed that we would receive advance notice of and have the opportunity to fully escort any property appraiser appointed to appraise Edison Court, and that any appraisal done would fully conform to MAI standards. We would also like the opportunity to review the draft report to ensure that there are no material inaccuracies before the final is completed.

18-9

18-10

18-11

Due to the magnitude of Alternative C, the much greater community and property damage and destruction that will be caused needlessly, when Alternative B is almost assuredly less costly, easier to construct and more effective, and the disastrous effect that Alternative C would almost certainly have to the existing community and the local retirees who have invested to improve Edison Court as part of their safe retirement, we implore Caltrans to wisely choose Alternative B as the preferred alternative.

18-12

Sincerely yours,


Michael Jaeger


Bob McHugh

Cc: R.A. Macpherson, Deputy District Director Right of Way, Caltrans District 4
Linda Emadzadeh, Air Space, Excess Land & LPA Services, Right of Way, Caltrans District 4
Nicholas Endrawos, Solano County Project Management, Caltrans District 4

Comment Letter 18, Michael Jaeger and Bob McHugh, Jaeger McHugh & Company, LLC, 10/15/10

Response to Comment 18-1

Comment noted.

Response to Comment 18-2

Cost estimates for anticipated right of way acquisition were provided by a real estate appraisal and acquisition firm with long-term experience on Department highway projects. The right of way costs were based on estimated values for general types of land uses from late 2008. They are estimates only, not the final determined value. Right of Way acquisition offers will be based on fair market value (FMV) appraisals conforming to the “Uniform Relocation Assistance and Real Property Acquisition Policy Act” (URAA).

The formal appraisal process will begin once the environmental clearance process is completed, the funds become available for right of way and construction and sufficient design development is completed to confirm right of way requirements. This could be several years after the environmental process is completed.

Response to Comment 18-3

The environmental document reflects the results of years of technical studies and analyses, and consultation with agencies. It is the goal of the Department to disclose to the public all environmental effects that could result from the project in compliance with state and federal environmental regulations. Section 2.4 of the Draft and Final EIR/EIS provides a comparison of the two build alternatives and Section 2.5 of the Final EIR/EIS “Identification of the Preferred Alternative” outlines the reasoning for the selection of Alternative C as the preferred alternative. Alternative C provides superior traffic operations and offers a more favorable construction phasing and staging opportunities. While the overall environmental impacts are similar, Alternative C would move the highway further from the Village of Cordelia Historic District, reducing impacts.

Both build alternatives and their fundable first phases were fully evaluated and their effects on the environment disclosed in the EIS/EIR. The environmental review process under NEPA and CEQA also involves consultation with a number of local, state and federal agencies including the U.S. EPA and USACE to determine the least environmentally damaging practicable alternative. On March 15, 2012 and April 10, 2012, the U.S. EPA and USACE respectively agreed that the LEDPA was Alternative C, Phase 1. This process is documented in Section 5.2 of the Final EIR/EIS.

Response to Comment 18-4

The realignment of Lopes Road has been changed since the Draft EIS/EIR to fully avoid any affect to the grounds of Rodriguez High School including the softball field. The Final EIR/EIS has been revised to reflect this change (See Appendix B, Resources Evaluated Relative to the Requirements of Section 4(f), page B-7).

Response to Comment 18-5

The benefits to vehicle-hours of delay and travel times for Alternatives B-1 and C-1 are different, as described in Table S-1 and Section 3.1.6 of the Draft and Final EIR/EIS, and as noted in the comment. The Draft EIR/EIS does not state an overall conclusion that the two alternatives are the same in reference to these specific measures. However, the Draft EIR/EIS does state that both alternatives produce benefits relative to the No Build alternative in many of the MOEs. (See Tables 3.1.6-6 through -9 in Section 3.1.6 of the Draft EIR/EIS and Tables 3.1.6-6 through 3.1.6-11 in the Final EIR/EIS.)

Response to Comment 18-6

Cost estimates for all alternatives were developed through an established and recognized methodology, which looks at a combination of right of way costs, utility relocation costs, construction costs, related support costs, and escalation. Cost estimates for anticipated right of way acquisition were provided by a real estate appraisal and acquisition firm with long-term experience on Department highway projects. Cost estimates for utility relocation costs were developed and discussed with utility owner for reasonableness. Cost estimates for roadway and construction costs were based on unit prices from summaries of recent Department construction bid openings. Project support costs were assumed to be a fixed percentage of construction costs (the same percentage for all alternatives). Escalation costs were the same for each alternative.

A Cost Estimate Certification form was prepared for the project estimates and approved by the Department. Subsequently FHWA staff reviewed the cost estimate prepared for Alternative C-1 and analyzed it in a probabilistic cost simulation program.

A fault rupture and displacement hazard study was performed for both the Green Valley and Cordelia fault zones to determine location of fault traces and potential magnitude of displacement during a seismic event. The report, accepted by the Department, was a factor in the preliminary bridge structure design and resultant cost estimate.

An alternative's cost estimate is not a factor used in the selection of a project's preferred alternative.

Response to Comment 18-7

Cost estimates for anticipated right of way acquisition were provided by a real estate appraisal and acquisition firm with long-term experience on Department highway projects. The right of way costs were based on estimated values for general types of land uses from late 2008. They are estimates only, not the final determined value. Right of Way acquisition offers will be based on fair market value (FMV) appraisals conforming to the "Uniform Relocation Assistance and Real Property Acquisition Policy Act" (URAA).

The formal appraisal process will begin once the environmental clearance process is completed, the funds become available for right of way and construction and sufficient design development is completed to confirm right of way requirements. This could be several years after the environmental process is completed.

Response to Comment 18-8

As noted in responses to comments 18-6 and 18-7, the costs are estimated using an established and recognized methodology and then reviewed by the Department. Further, costs for Alternative C-1 were tested by FHWA using their cost simulation program and determined to be acceptable.

Right of way acquisition costs will be independently appraised and will not be based on the estimates included in the environmental document. The right of way acquisition costs are independent of other project costs, including construction costs. This means that FMV for property as determined by a certified real estate appraiser will be offered regardless of other project costs

Response to Comment 18-9

The Draft EIR/EIS in Tables 3.1.4-3 and 3.1.4-4 indicate that the business located at 494, 495 and 499 Edison Court would be displaced under Alternative C and Alternative C, Phase 1. Table 3.1.4-4 inaccurately indicated 499 Edison Court as 399 Edison Court. This has been corrected in the Final EIR/EIS.

Response to Comment 18-10

As noted in response to comment 18-7, the right of way acquisition process, including appraised values and final compensation are based on procedures included in the Public Law 91-646, the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended which includes an opportunity for the owner to accompany the property appraiser in their field review of the subject property.

Response to Comment 18-11

As noted in response to comment 18-7, the right of way acquisition process, including appraised values and final compensation are based on procedures included in Public Law 91-646, the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended. The details of the final appraisals will be provided to property owners for review.

Response to Comment 18-12

As discussed in response to comment 18-3, both build alternatives and their fundable first phases were fully evaluated and their effects on the environment disclosed in the EIS/EIR. The environmental review process under NEPA and CEQA also involves consultation with a number of local, state and federal agencies including the U.S. EPA and USACE to determine the least environmentally damaging practicable alternative. On March 15, 2012 and April 10, 2012, the U.S. EPA and USACE respectively agreed that the LEDPA was Alternative C, Phase 1. This process is documented in Section 5.2 of the Final EIR/EIS.



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

Letter 19

October 18, 2010

Howell Chan
California Department of Transportation
District 4
P.O. Box 23660
Oakland, California 94623-0660

Subject: Draft Environmental Impact Statement for the Interstate 80/Interstate 680/State Route 12 Interchange Project, Solano County, California (CEQ #20100342)

Dear Mr. Chan:

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. EPA has previously provided feedback on this project through the *National Environmental Policy Act and Clean Water Act Section 404 Integration Process for Surface Transportation Projects Memorandum of Understanding (NEPA/404 MOU)*. EPA appreciates the efforts made by the project development team to coordinate through the NEPA/404 MOU process. Our detailed comments are enclosed.

EPA has rated this document EC-2, *Environmental Concerns, Insufficient Information*. Please see the enclosed *Summary of EPA Rating Definitions* for a description of our rating system. Our rating is based on concerns about impacts to wetlands and waters of the United States, air quality, environmental justice communities, and the transportation benefits of the project. We also have recommendations regarding historic resource consultation and agricultural land preservation.

We appreciate the opportunity to review this Draft Environmental Impact Statement and look forward to future coordination on the project. The next steps in the NEPA/404 MOU process are agreement on the 1) Least Environmentally Damaging Practicable Alternative (LEDPA), the only alternative that is permissible pursuant to the Clean Water Act Section 404(b)(1) Guidelines, and 2) the conceptual mitigation plan. We look forward to receiving future information from Caltrans regarding the LEDPA and conceptual mitigation plan. When the Final Environmental Impact Statement is released

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for public review, please send two hard copies to the address above (mail code: CED-2) at the same time the document is filed with our EPA Headquarters office.

If you have any questions, please contact me (415-947-4161; dunning.connell@epa.gov) or Carolyn Mulvihill, the lead reviewer for this project, at 415-947-3554 or mulvihill.carolyn@epa.gov.

Sincerely,



Connell Dunning, Transportation Team Supervisor
Environmental Review Office

Enclosures:

Summary of EPA Rating Definitions
EPA's Detailed Comments

cc: Janet Adams, Solano Transportation Authority
John Cleckler, U.S. Fish and Wildlife Service
Jacqueline Pearson-Meyer, National Marine Fisheries Service
Andrea Meier, U.S. Army Corps of Engineers
Brendan Thompson, Regional Water Quality Control Board
Melissa Escaron, California Department of Fish and Game

EPA DETAILED COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE INTERSTATE 80/INTERSTATE 680/SR-12 INTERCHANGE PROJECT, OCTOBER 18, 2010

Wetlands and Other Waters of the United States

EPA has participated in this project as outlined in the *National Environmental Policy Act and Clean Water Action Section 404 Integration Process for Surface Transportation Projects Memorandum of Understanding* (NEPA/404 MOU). The next steps in the NEPA/404 MOU process are agreement on the Least Environmentally Damaging Practicable Alternative (LEDPA) and the conceptual mitigation plan (Checkpoint 3).

The following additional information is needed to support the NEPA/404 MOU process and justify selection of the LEDPA and conceptual mitigation plan. This information should be provided in the Final Environmental Impact Statement (FEIS) and in the future request for agreement on the LEDPA and the conceptual mitigation plan.

Recommendations:

- Engage EPA, the Army Corps of Engineers, and other resource agencies in the identification of the LEDPA before publication of the FEIS, as outlined in the NEPA/404 MOU. 19-1
- Identify in the FEIS and in the LEDPA agreement request the length of time temporary fill in waters of the U.S. will be left in place. Temporal losses should be minimized to the maximum extent practicable (e.g. by placing and removing fill as construction progresses). Discuss in the FEIS how this will be achieved. Caltrans may be required to provide compensatory mitigation for “temporary” impacts if fill is left in place for an extended period of time. 19-2
- In the FEIS, consider indirect impacts to wetlands, including impacts from alteration of hydrology. Section 3.3.2.3 and 3.3.2.5 state that the project may result in indirect impacts caused by sedimentation or modification of hydrology of adjacent wetlands. However, the DEIS does not address the extent of these impacts or whether mitigation is necessary to offset indirect impacts. The FEIS should discuss whether any wetlands outside the roadway footprint will be permanently affected by indirect impacts from the proposed project. Avoidance, minimization, and mitigation of these impacts should also be discussed. 19-3
- Confirm that all compensatory mitigation for waters of the U.S. will comply with the EPA/U.S. Army Corps of Engineers 2008 Compensatory Mitigation Rule (40 CFR Part 230, Subpart J). 19-4
- Include in-kind compensation as a mitigation option in the FEIS and conceptual mitigation plan. Sections 3.3.2.1 and 3.3.2.2 of the DEIS present two options for compensatory mitigation of federally jurisdictional drainages: (1) purchase credits from an approved mitigation bank, or (2) compensate out of kind. Caltrans must also 19-5

<p>consider in-kind compensation for all waters of the U.S., including drainages. Only if in-kind compensation is found to be impracticable can out-of-kind compensation be considered. Therefore, the FEIS, and conceptual mitigation plan, should add in-kind restoration or enhancement to the compensatory mitigation options for drainages.</p>	<p>19-5 cont.</p>
<ul style="list-style-type: none"> Section 3.3.2.3 identifies impacts to a previous compensatory mitigation area adjacent to Green Valley Creek. Since this area was intended to compensate for impacts of the Green Valley Corporate Park Project, Caltrans will need to mitigate for impacts to the Green Valley Creek mitigation area at a minimum 2:1 ratio. The actual ratios for all compensatory mitigation will be determined in consultation with the appropriate regulatory agencies. However, the FEIS should specifically identify the impacts to previous mitigation areas and the need to compensate for these impacts at a higher ratio. 	<p>19-6</p>
<ul style="list-style-type: none"> Section 3.3.2.3 identifies onsite restoration as an option for compensation of permanent impacts to perennial, alkali, and seasonal wetlands. The plans and performance standards presented in this section for onsite restoration may be inadequate. Mitigation plans, including ratios, type, monitoring, and performance standards, will need to be coordinated with and approved by the resource and regulatory agencies. 	<p>19-7</p>
<p><i>Suisun Marsh</i></p>	
<p>Given the special designation of Suisun Marsh by the Suisun Marsh Protection Act and the status of the Suisun Marsh wetlands as impaired under the Clean Water Act Section 303(d), EPA is concerned about impacts to jurisdictional seasonal drainages and other areas in the Suisun Marsh Secondary Management Area. We encourage Caltrans to avoid and minimize impacts to this area to the maximum extent practicable and document those avoidance and minimization measures in the FEIS.</p>	<p>19-8</p>
<p><i>Recommendation:</i></p>	
<ul style="list-style-type: none"> Avoid and minimize impacts to the Suisun Marsh Secondary Management Area to the maximum extent practicable and document those avoidance and minimization measures in the FEIS. Identify the specific measures that will be taken to ensure no further impairments to Suisun Marsh. 	
<p>Air Quality</p>	
<p><i>Affected Environment</i></p>	
<p>The Affected Environment section of the DEIS includes some unclear information. The prevailing winds are described as “easterly,” though they come from the west. It is also unclear from this section whether the air pollutant movement described is occurring from the Central</p>	<p>19-9</p>
<p style="text-align: center;">2</p>	

Valley to the Bay Area, or vice versa, and what the significance of this information is. The description of elevated pollutant levels should also be expanded to explain whether it refers to the project area or a regional area, and what is the directional source (e.g. from the west) of the pollutants.

19-9
cont.

Recommendation:

- Clarify the Affected Environment information in the FEIS, including prevailing winds, and air pollutant sources and movement. Provide additional context for how this information affects pollutant levels and receptors.

Project Conformity

The DEIS states that only Alternative C, Phase 1 is included in the 2035 Regional Transportation Plan and Transportation Improvement Program. If Alternative B is chosen as the preferred alternative in the FEIS, the alternative must be included in the Regional Transportation Plan and Transportation Improvement Program to meet conformity requirements.

The DEIS also states that the build alternatives are not considered Projects of Air Quality Concern (POAQC), which determines whether a PM_{2.5} hot spot analysis is required. The DEIS states that confirmation of this determination will be made during interagency consultation with the appropriate local, state, and federal agencies and the final analysis will be identified in the final environmental document.

EPA participated in the October 4, 2010 Air Quality Conformity Task Force meeting where this project was discussed. It is our understanding that the group did not reach a decision as to whether the project is a POAQC and that Caltrans/Solano Transportation Authority will be providing additional information to the group. This consultation process should be completed prior to publication of the FEIS. If the group determines that the project is a POAQC, then a PM_{2.5} hot spot analysis must be performed and the results included in the FEIS.

Recommendations:

- As stated in the DEIS, if Alternative B is chosen as the preferred alternative in the FEIS, the alternative will need to be included in the Regional Transportation Plan and Transportation Improvement Program to meet conformity requirements.
- Complete consultation with the Air Quality Conformity Task Force to determine whether the project is a POAQC. If so, perform a PM_{2.5} hot spot analysis and report the results of that analysis in the FEIS. Include proposed mitigation measures for any impacts determined in that analysis.

19-10

19-11

Mobile Source Air Toxics

EPA commends Caltrans for identifying the general locations of sensitive receptors in the project area and performing a quantitative mobile source air toxics (MSAT) emissions analysis

19-12

of the project alternatives. We note that the DEIS acknowledges that all project alternatives may result in increased exposure to MSAT emissions in certain locations, but since dispersion modeling was not performed, it is not possible to determine where and at what level that exposure would occur.

The DEIS states that “available technical tools do not enable us to predict the project-specific health impacts of the [MSAT] emission changes associated with the project alternatives.” EPA, FHWA, and Caltrans have an ongoing dialogue regarding the technical tools available for analysis of MSAT impacts. Tools for evaluating project-specific health impacts from MSATs do exist and EPA would like to work with Caltrans to identify appropriate and available methods for evaluating MSAT impacts to include in the FEIS.

19-12
cont.

Recommendations:

- Technical tools are available to analyze the MSAT impacts of the various alternatives at specific locations and EPA recommends their use to determine impacts on sensitive receptors near the proposed project.
- Commit to the mitigation measures listed in the DEIS to reduce MSAT impacts.

19-13

Transportation Impacts

The Traffic and Transportation chapter contains certain data that indicates that Alternative C, Phase 1 may not achieve the goal of accommodating current and future traffic volumes and other resulting benefits that are stated in the Purpose and Need of the project. Table 3.1.6-6 contains System Wide Measures of Effectiveness for Construction-Year 2015, A.M. Peak Hour Conditions, and indicates that Travel Times and Maximum Individual Delay would be higher for the Westbound I-80 to Southbound I-680 travel direction with Alternative C, Phase 1 than with the No-Build alternative. Table 3.1.6-9 contains System Wide Measures of Effectiveness for Design-Year 2035, P.M. Peak Hour Conditions, and indicates that Travel Times and Maximum Individual Delay would be higher for all listed travel directions with Alternative C, Phase 1 than with the No-Build alternative.

19-14

Considering the lack of identified funding for the complete Alternative C, EPA is concerned with Alternative C, Phase 1’s apparent degradation of travel times when compared to the No-Build alternative. If Alternative C, Phase 1 is chosen as the Preferred Alternative in the FEIS, Caltrans must provide evidence that this alternative would fulfill the project’s Purpose and Need if Phase 2 were not to be built.

Recommendations:

- If Alternative C, Phase 1 is chosen as the Preferred Alternative, the FEIS, as well as the request for agreement on the preliminary LEDPA, must justify that this alternative would fulfill the Purpose and Need, when compared to the No-Build Alternative. The justification should include a discussion of the modeling results and

19-15

the transportation costs and benefits of Alternative C, Phase 1 relative to the No-Build and Alternative B, Phase 1. This is important since the DEIS states that Alternative C, Phase 1 would increase travel times and delay relative to the No-Build Alternative. The discussion should also address how the modeled increases in travel times could be decreased through design measures or through Transportation Demand Management or Transportation System Management.

19-15
cont.

- If Alternative C, Phase 1 cannot be proven to fulfill the Purpose and Need of the project, Alternative B, Phase 1, or other alternatives, must be considered.

19-16

Project Alternatives

Chapter 2 of the DEIS states “Under both alternatives, I-80 and I-680 would be widened. I-80 would be widened to a minimum of ten lanes...and a maximum of 19 lanes east of the interchange with I-680...I-680 would be widened to a minimum of six lanes...and a maximum of eight lanes.” It is unclear from this project description whether the footprint of the project has been determined (e.g. that I-80 will be 10 lanes in certain areas and up to 19 lanes in other areas along the corridor) or whether the number of lanes is still being determined. The project description in the FEIS should be clarified to specify the number of lanes that will be constructed at locations within the project area, and to clarify that the subsequent impact analyses reflect the impacts of that footprint.

19-17

Recommendation:

- Clarify in the FEIS the number of lanes that will be constructed at locations within the project area and base the impact analysis on that footprint. Update the Affected Environment section of the FEIS, if necessary, to ensure that the impact analysis is representative of the widest footprint that may be built.

Environmental Justice

The Environmental Justice Section of the DEIS (3.1.4.3) identifies Census Tract Block Groups in the project area that would be considered environmental justice communities. However, the DEIS only considers the displacement impacts on those communities. The environmental justice analysis should consider all project impacts on affected communities. As stated in the DOT Order on Environmental Justice:

“Adverse effects means the totality of significant individual or cumulative human health or environmental effects, including interrelated social and economic effects, which may include, but are not limited to: bodily impairment, infirmity, illness or death; air, noise, and water pollution and soil contamination; destruction or disruption of man-made or natural resources; destruction or diminution of aesthetic values; destruction or disruption of community cohesion or a community's economic vitality; destruction or disruption of the availability of public and private facilities and services; vibration; adverse employment effects; displacement of persons,

19-18

businesses, farms, or nonprofit organizations; increased traffic congestion, isolation, exclusion or separation of minority or low-income individuals within a given community or from the broader community; and the denial of, reduction in, or significant delay in the receipt of, benefits of DOT programs, policies, or activities.”¹

The FEIS should include an environmental justice analysis that considers all impacts on environmental justice communities. EPA notes in particular that the majority of the residences affected by noise impacts are located in an environmental justice community. A noise barrier to mitigate impacts at this location was considered feasible, but not cost-reasonable, according to the DEIS analysis.

19-18
cont.

Recommendations:

- Perform an environmental justice analysis that considers all potential project impacts on environmental justice communities.
- Document impacts and proposed mitigation in the FEIS.
- If mitigation of noise impacts to environmental justice communities is deemed not “cost-reasonable,” justify this determination in terms of the relation of mitigation cost to project cost. Provide information on how Caltrans determined the base cost-per-residence allowance of \$31,000. Also provide the context for this determination by providing examples of other Caltrans projects where sound barriers were incorporated. Discuss any variation that exists in the determination of the threshold for the cost-per-residence for multiple Caltrans projects (in District 4 and outside District 4) and what factors deem the mitigation for this project not cost-effective if mitigation at similar cost has been implemented in other projects.

19-19

Historic Resources and Parkland

The DEIS states that coordination efforts between Caltrans and the State Historic Preservation Officer (SHPO) are currently underway regarding the SHPO’s concurrence on the finding of no adverse effect on the identified historic resources. EPA recommends that consultation be completed and that a Programmatic Agreement (PA) be executed prior to publication of the FEIS and any mitigation commitments be documented in the Record of Decision (ROD). We also recommend that Caltrans receive concurrence from the City of Fairfield on the finding of de minimis impacts under Section 4(f) on the Fairfield Linear Park prior to publication of the FEIS.

19-20

Recommendations:

- Complete consultation with the SHPO and execute a PA prior to publication of the FEIS. Commit to any mitigation measures in the ROD.

¹ Department of Transportation (DOT) Order To Address Environmental Justice in Minority Populations and Low-Income Populations, 1997.

- Confirm concurrence on the de minimis finding for the Fairfield Linear Park with the City of Fairfield prior to publication of the FEIS

19-21

Agricultural Land

EPA commends Caltrans on its commitment to mitigate loss of land classified as “Prime Farmland” and land under agricultural conservation easements by obtaining conservation easements to preserve a corresponding acreage of Prime Farmland. As stated in the DEIS, the City of Fairfield General Plan Land Use Element includes the program, “Where land is identified as Prime Farmland, Farmland of Statewide Importance, or Unique Farmland...and is proposed for conversion to urban uses, the city shall arrange for preservation of an equal amount of the same class of farmland within the area.” Given this program, the goals of other local plans, and the importance of agriculture to the economy and character of the area, EPA recommends that Caltrans work with the local jurisdictions and other groups such as the Solano County Land Trust, to mitigate for losses of all farmland classified as Prime Farmland, Farmland of Statewide Importance, or Unique Farmland.

19-22

Recommendation:

- In addition to compensation for Prime Farmland and land under agricultural conservation easement, compensate for impacts to Farmland of Statewide Importance and Unique Farmland through similar preservation efforts. Include in the FEIS and ROD the specific measures that will be taken to compensate for these impacts.

Climate Change

While the federal government has not yet released final guidance on greenhouse gas analysis, a discussion of potential climate change impacts of the project, and on the project, should be included in NEPA documents. The Council on Environmental Quality released draft *NEPA Guidance on Consideration of the Effects of Climate Change and Greenhouse Gas Emissions*² in February 2010.

19-23

Recommendation:

- Include the climate change discussion in the main body of the FEIS.

² <http://www.whitehouse.gov/sites/default/files/microsites/ceq/20100218-nepa-consideration-effects-ghg-draft-guidance.pdf>

SUMMARY OF EPA RATING DEFINITIONS*

This rating system was developed as a means to summarize the U.S. Environmental Protection Agency's (EPA) level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the Environmental Impact Statement (EIS).

ENVIRONMENTAL IMPACT OF THE ACTION

"LO" (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

ADEQUACY OF THE IMPACT STATEMENT

"Category 1" (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

"Category 2" (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

"Category 3" (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640, Policy and Procedures for the Review of Federal Actions Impacting the Environment.

**Comment Letter 19, Connell Dunning, Transportation Team Supervisor,
Environmental Review Office, United States Environmental Protection Agency,
10/18/10**

Response to Comment 19-1

Per the NEPA/Section 404 MOU, coordination with federal and state agencies, and concurrence or agreement on the LEDPA is required before proceeding with the approval of the final environmental document and the Record of Decision. The Department has engaged the U.S. EPA, Army Corps of Engineers, U.S. Fish and Wildlife Service, California Department of Fish and Game and the Regional Water Quality Control Board, and NOAA's National Marine Fisheries Service regarding the identification of the LEDPA. Section 5.2 of this Final EIR/EIS discusses the consultation and identification of Alternative C, Phase 1 as the LEDPA. LEDPA concurrence has been obtained from these agencies and included in Appendix H.

Response to Comment 19-2

Temporary fill in the form of coffer dams would be left in waters of the U.S. for less than one year in all cases. Impacts that persist for less than one year are considered temporary by the USACE. Construction at Green Valley Creek will take multiple seasons, but coffer dams will not be left in place during the wet season. The definition of temporary impact has been added to the impact discussions in Sections 3.3.2.1, 3.3.2.2, and 3.3.2.3 of the Final EIR/EIS.

Response to Comment 19-3

The text has been revised to include a discussion of indirect impacts on wetlands in Sections 3.3.2.3, 3.3.2.4, and 3.3.2.5. Mitigation is necessary to avoid these potential indirect impacts, therefore, the avoidance and minimization measure in Section 3.3.2.1 (Protect Water Quality and Prevent Erosion and Sedimentation into Drainages and Wetlands) was revised to include exclusion fencing and silt fencing during construction. Because the avoidance and minimization measures will prevent the indirect impacts, no additional compensatory mitigation for indirect impacts on wetlands is included in the Final EIR/EIS.

Response to Comment 19-4

All mitigation for waters of the US will be developed in coordination with the USACE and will comply with the Compensatory Mitigation Rule. This language has been added to the required components in the mitigation measures for riparian and wetland compensation in Sections 3.3.2 and 3.3.2 of the Final EIR/EIS.

Response to Comment 19-5

For impacts to perennial streams, the RWQCB will require riparian mitigation. In-kind compensation is included for all waters of the US except for seasonal and perennial drainages, which are mitigated out-of-kind with riparian habitat. Text has been revised in Sections 3.3.2 and 3.3.2 of the Final EIR/EIS to reflect this.

Response to Comment 19-6

The compensatory wetland mitigation site located near Green Valley Creek would be affected under Alternative B. The wetland mitigation measure in Section 3.3.2 of the Final EIR/EIS has been revised as indicated below, to specify minimum 2:1 for impacts on this particular feature.

“In compliance with the CWA Section 404 permit and WDRs, the permanent loss (fill) of wetlands, including perennial marsh, alkali seasonal marsh, and seasonal wetland, will be compensated for and measures will be taken to ensure no net loss of habitat functions. Loss of wetlands will be compensated for at a minimum ratio of 1:1 (one acre of mitigation for every one acre filled), **except for any loss of wetlands in W-45e-1 that are a mitigation area and will require mitigation at a minimum ratio of 2:1.**”

Response to Comment 19-7

Compensation for permanent loss of wetlands may be a combination of mitigation bank credits and restoration/creation of habitat. The portion of the measure addressing compensation through restoration or creation of habitat in Section 3.3.2.3 “Compensate for Permanent Loss of Wetlands” of the Final EIR/EIS has been revised to indicate that mitigation will occur near the project site, as opposed to on-site. There are currently no plans for on-site creation or enhancement of wetlands, because the areas available for mitigation are small and isolated. Text has been added to the measure to indicate that the wetland restoration plan would be developed in coordination with the RWQCB and USACE. Details of plans and performance standards will be developed in close coordination with the USACE and RWQCB as part of the NEPA/Section 404 MOU process.

Response to Comment 19-8

Efforts to avoid and minimize impact to the Suisun Marsh Secondary Management Area primarily included engineering the interchange to occupy the smallest footprint possible. During the initial and secondary screening process a number of alternative interchange configurations were reviewed and compared to determine which configurations provided safe and adequate traffic operations for projected traffic, while minimizing impacts to sensitive habitat. The most practical solution, and the one with the least impact to sensitive areas, is to improve existing facilities rather than constructing improvements on new alignments. During final design, more detailed foundation analysis and design refinement will be performed to identify opportunities (such as retaining walls, reduced roadway profiles, etc.) that would reduce impacts to sensitive areas. Additionally, specific language regarding the Suisun Marsh Secondary Management Area has been added to the avoidance and minimization pertaining to protecting water quality and preventing erosion and sedimentation in drainages and wetlands in Section 3.3.2 of the Final EIR/EIS.

Response to Comment 19-9

The text in Section 3.2.6 of the Final EIR/EIS has been revised to clarify the wind directions and their connection to pollutant levels and receptor as follows:

“Within the region, the prevailing winds are from the west. During the summer and fall months, **high offshore pressure systems and low pressure in the Central Valley force** marine air to flow eastward through the Carquinez Strait. **However, atmospheric conditions occasionally cause the winds to shift direction and flow from the east.** These easterly winds usually contain more pollutants from the Sacramento and San Joaquin Valleys in the east than the cleaner marine air from the west. During summer and fall months, this condition can result in elevated pollutant levels as pollutants move through the strait into the central Bay Area from surrounding areas.”

Response to Comment 19-10

Comment noted. The description for Alternative C is the project that is described in the RTP and the TIP. Since Alternative C, Phase 1 was identified as the preferred alternative, revisions of the RTP or TIP are not needed.

Response to Comment 19-11

Comment noted. Interagency consultation (IAC) has been initiated and a determination was made that the project is potentially a POAQC. A qualitative PM2.5 hot spot assessment was conducted, and resulted in the conclusion that the project would not result in violations of the federal PM2.5 or PM10 air quality standards. This determination was confirmed by appropriate agencies during IAC on December 8, 2010. The FHWA concurrence letter was signed on April 13, 2011. The Final EIR/EIS document has been updated to convey this information (Section 3.2.6).

Response to Comment 19-12

The language in question is taken directly from FHWA's prototype language found in their 2006 MSAT guidance regarding incomplete or unavailable information for compliance with 40 CFR 1502.22. The language in question has been replaced in Section 3.2.6 of the Final EIR/EIS with updated language from the FHWA's 2009 MSAT guidance. Based on FHWA's 2009 MSAT guidance, the project was identified as being a project with higher potential MSAT effects, and a quantitative analysis of MSAT emissions was conducted. The quantitative analysis indicated that project implementation would lead to decreases in MSAT emissions relative to existing conditions and would result in increases in some MSAT emissions relative to future no project conditions. However, an analysis of the project's MSAT impacts on sensitive receptors is not conducted because, as indicated in the Final EIR/EIS, there are no established criteria for determining when MSAT emissions should be considered a significant issue given the EPA has not established regulatory concentration targets for the six relevant MSAT pollutants appropriate for use in the project development process and the emerging state of the science and of project-level analysis techniques. To the extent that it is applicable or feasible for the project and through coordination with the project development team, Mitigation Measure AQ-2 will help to reduce MSAT emissions and air quality impacts associated with the build alternatives.

Response to Comment 19-13

The Department is committed to implement the mitigation measures to reduce MSAT emissions identified in the Draft and Final EIR/EIS in Section 3.2.6.

Response to Comment 19-14

The comment refers to the performance of Alternative C Phase 1 relative to the No Build alternative, in both 2015 and 2035. The specific comment referring to Table 3.1.6-6 of the Draft EIR/EIS, which summarizes 2015 AM peak hour conditions, highlights the only two MOEs in that table that are worse under Alternative C, Phase 1 than the No Build case, and the differences are minor. The difference in travel times for WB I-80 to SB I-680 is 15 seconds, or 2.5 percent, and the difference in maximum individual delay is also 15 seconds for that route. All other AM peak hour MOEs improve relative to the No Build Alternative.

The differences presented in Table 3.1.6-9 of the Draft EIR/EIS, however, are more substantial. This table summarizes for the 2035 PM Peak Hour, No Build, Alternative B Phase 1, and

Alternative C Phase 1 cases. While many of the system-wide MOEs presented in this table (and all of the MOEs presented in Table 3.1.6-8 for the AM peak hour) improve over the No Build case, the peak direction travel times are identified as longer than the No Build case for Alternative C Phase 1. This issue was more closely examined after the Draft EIR/EIS was published, and it was found that the longer travel times were the result of the extensive upstream queues in the No Build case not being included in the calculation. This happened because the study area limits were not set far enough upstream to capture the full extent of queuing for the 2035, PM peak hour, peak direction cases, for the No Build, Alternative B Phase 1, and Alternative C Phase 1 cases. When the full queue length is included, the revised travel times are as shown in Table 3.1.6-10 in the Final EIR/EIS. Note that only the information in the shaded area has been revised, as the upstream queuing effect was only an issue for these cases. The revised comparison shows that Alternative C, Phase 1 does in fact deliver improved travel times relative to the No Build case.

The information in Table 3.1.6-10, along with more explanatory text, has been included in a revision to the Traffic Operations Report (TOR) in Section 3.1.6 of the Final EIR/EIS.

The maximum individual delays were also revised based on the corrected analysis, and are now shown to improve over the No Build alternative, as shown in Table 3.1.6-9 in the Final EIR/EIS. This table is also being included in the revised TOR.

Based on the revised information, it is clear that Alternative C Phase 1 provides benefits in all MOE areas, relative to the No Build alternative and can meet project objectives if future phases are delayed or not built.

Response to Comment 19-15

See response to comment 19-14. EPA has concurred that Alternative C, Phase 1 is the preliminary LEDPA, see Appendix H.

Response to Comment 19-16

See response to comment 19-14.

Response to Comment 19-17

The project description is intended to provide an overview to make the project understandable to the public. The lane widening has been determined, but will vary slightly between alternatives. The width of the highway would increase as one approached the interchange and decrease after it had passed. A list of lane additions between points for each alternative would be confusing. The discussion in Section 2.3.1 of the Final EIR/EIS has been revised as indicated below to clarify where the most and least lane widening will occur. (Bold indicates added text.)

“Under both alternatives, I-80 and I-680 would be widened. I-80 would be widened to a minimum of ten lanes (four mixed-flow lanes and one HOV lane in each direction) **near the eastern and western ends of the project** and a maximum of 19 lanes **extending** east of the interchange with I-680 **to approximately the westbound truck scales** (Figures 2-2 and 2-3). I-680 would be widened to a minimum of six lanes (two mixed-flow lanes and one HOV lane in each direction) and a maximum of eight lanes (three mixed-flow lanes and one HOV lane in each direction) **north of the Red Top Road interchange.**”

The study area for all resources includes the most extensive footprint and all areas that may be affected by the project.

Response to Comment 19-18

The scope of the I-80/I-680/SR12 Interchange Improvement project is very large and includes transportation improvements across many communities, both environmental justice communities and non-environmental justice communities. As documented in the Draft EIR/EIS the impacts of the build alternatives are also spread across a large area, with some of the most substantial effects, such as business displacement occurring in areas that are not environmental justice communities. In addition, the benefits provided by the project such as reduced congestion, reduced cut-through traffic on local streets, encouraged use of HOV lanes and ridesharing, and improved safety would be equally realized by both environmental justice communities and non-environmental justice communities.

With specific regard to noise impacts on environmental justice communities, the Draft EIR/EIS identified that the build alternatives would result in noise impacts to residents along the north side of State Route 12 East. This area is already protected from noise generated on State Route 12 by existing sound walls (H-1 and H-2 in the EIR/EIS). Four monitored locations on Marquette Way (H01, H06, H09 and H11) would experience noise increases that would approach or exceed NAC under both full build alternatives. This represents 25 residences that would experience future noise levels ranging from 62 to 69 dBA Leq, with the existing sound walls in place. Therefore, abatement was considered. The Draft EIR/EIS evaluated raising the height and extending the sound walls to provide additional noise reduction. Noise barrier H-2 is ten feet high. Raising H-2 to a height of 16 feet was found not to benefit any receivers in that it did not reduce noise by 5dB, and therefore, raising the barrier was not feasible. Noise barrier H-1 is 8 feet high. Analysis was conducted to determine if raising the height of the existing wall up to 14 or 16 feet would result in an additional 5 dB of noise reduction. Since 5 dB of noise reduction could be achieved by raising the height of the barrier to 14 feet or 16 feet, the barrier was determined to be feasible. However, the cost was found to exceed the Caltrans cost reasonableness allowance for this area. The reasonableness allowance per residence was calculated using the procedure defined in the 2006 Caltrans Protocol.

The Department has determined that the barriers studied in this analysis are not considered reasonable from a cost perspective. The public input process has been completed and the final determination is that none of the barriers evaluated will be included in the project (see Section 3.2.7 of the Final EIR/EIS).

Response to Comment 19-19

The cost of the project is not a factor in determining reasonableness of noise abatement. As stated in the 2006 protocol, the determination of the reasonableness of noise abatement is more subjective than the determination of its feasibility. For a noise barrier to be reasonable from a cost perspective, the estimated cost of the noise barrier should be equal to or less than the total cost allowance calculated for the barrier. The base allowance of \$31,000 is based on the published Department Construction Price Index and is adjusted annually. The total allowance per residence is determined by adding several adjustments to the base allowance based on several factors identified in the Protocol. Other factors that affect reasonableness include the following: absolute noise levels, existing versus design-year noise levels, achievable noise reduction, date

of development along the highway, life cycle of noise abatement measures, and environmental impacts of abatement construction. Additional factors to consider include opinions of affected residents; input from the public and public agencies; and social, economic, legal, and technological factors.

Response to Comment 19-20

The Department proposed that identification and evaluation of archaeological properties within the APE, and any resolution of adverse effects on those properties, be provided for in a programmatic agreement specific to the undertaking. As an attachment to the PA, SHPO further states that a Historic Property Treatment Plan (HPTP) will be developed which will address detailed protocol for identification, evaluation, and treatment of historic properties. The need for monitoring and treatment of unknown properties will also be addressed in the HPTP. SHPO concurred with this course of action (in addition to eligibility of several built resources and two historic districts) on March 20, 2010. The PA was approved by SHPO and Department HQ on November 7, 2011 and by the Department District 04 Director on November 8, 2011.

Response to Comment 19-21

The City of Fairfield has provided a letter, dated November 22, 2010, indicating the proposed project will have a minimal impact upon the Fairfield Linear Park. Please see Appendix B of the Final EIR/EIS.

Response to Comment 19-22

According to the Solano County General Plan, Figure AG-1, all farmlands affected by the project are either classified as Prime Farmlands or grazing lands. Grazing lands within the project area are not classified as Farmlands of Statewide Importance or Unique Farmlands. Therefore no farmlands of Statewide Importance or Unique Farmlands would be adversely affected by the project.

Response to Comment 19-23

Climate change is briefly discussed and in Section 3.2.6 Air Quality. This section refers the reader to Chapter 4 (CEQA) for a more in depth analysis of climate change impact analysis. Because there have been more requirements set forth in California legislation and executive orders regarding climate change, the issue is addressed in the California Environmental Quality Act (CEQA) chapter of this environmental document and may be used to inform the National Environmental Policy Act (NEPA) decision.



Letter 20

Fairfield-Suisun Unified School District

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October 26, 2010

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SUBJECT: Interstate 80/Interstate 680/State Route 12 Interchange Project
(#04-0000-0150)

Dear Mr. Chan:

We appreciate the opportunity to provide Fairfield-Suisun Unified School District's ("District") comments on the Draft Environmental Impact Report/Environmental Impact Statement ("EIR/EIS") for the Interstate 80/Interstate 680/State Route 12 Interchange Project ("Project"). Our review of the Draft Project EIR/EIS reveals the need for further analyses and mitigation in the impact areas of:

- (1) traffic,
- (2) student pedestrian safety,
- (3) emergency access,
- (4) air quality,
- (5) noise,
- (6) land use, and
- (7) Section 4(f) concerning the Angelo Rodriguez High School ("Rodriguez HS") that is within the Western Section of the Project on Red Top Road between I-80 and I-680.

20-1

Although the District commends the prospect of improved highway capacity and flow, the potential impacts upon Rodriguez HS from Alternative B; Alternative C; and Alternative C, Phase 1 have not been adequately analyzed or mitigated. As a result, the District requests further analysis and accompanying mitigation as set forth more fully below. Additionally, the proposed taking of Green Valley Middle School site under Alternative B and Alternative B, Phase 1 will impair the District's ability to sell, lease, or exchange the site as a means to obtain a new elementary/middle school site.

20-2

As you know, the District is entrusted with providing its students with a high quality education, which includes insuring that its students are safe and are not significantly or cumulatively impacted by development whether private or public. The Draft EIR/EIS acknowledges that the District instructs children at two public schools within or near the Project area: (1) Rodriguez HS and (2) Nelda Mundy Elementary School. It also acknowledges the presence of the former Green Valley Middle School within the Project area. Alternative B's proximity to and Alternatives C and C, Phase 1's taking of a portion of Rodriguez HS raise the concern that construction and operation of the Project will adversely affect the students' safety, health, and learning environment more than as disclosed in the Draft EIR/EIS. The full range of potential impacts to Rodriguez HS should be adequately evaluated and mitigated to protect our students, parents, faculty, and staff.

20-3

"Our Mission is to Provide a Quality Educational System that Assures Opportunities for Every Student to Learn and Meet the Challenges of the Future"

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This letter is technical in nature due to the subject matter. The District wishes to emphasize that its comments are meant to ensure that the California Department of Transportation (“Caltrans”) and the Federal Transit Administration (“FTA”) fully evaluate and mitigate the potential impacts to Rodriguez HS and the former Green Valley Middle School site. The intent of these comments are to raise those particular issues concerning the District’s schools to ensure the well being of our students and maintaining the best possible environment for educating our children.

20-3
 cont.

I. TRAFFIC.

A. Operational Traffic.

The Draft EIR/EIS provides a thorough analysis of traffic impacts on the freeways and interchange ramps, but there is no traffic impact analysis for surface street segments or intersections. Rodriguez HS fronts Red Top Road near the I-680 and Lopes Road. Alternative B; Alternative C; and Alternative C, Phase 1 will all create a new interchange at I-680 and Red Top Road/Lopes Road and improve the interchange at I-80 and Red Top Road to the west of Rodriguez HS. These improvements will entice traffic traveling north on I-680 to I-80 to potentially use Red Top Road as a shortcut means of bypassing the I-80/I-680 Interchange. Currently, motorists are discouraged from using Red Top Road as a bypass because there is not an interchange at I-680 and Red Top Road. Instead, such motorists have to travel along Lopes Road to the Gold Hill/I-680 interchange. This new Red Top Road “bypass” would also entice those traveling north on I-80 to south on I-680 when congestion occurs at the I-80/I-680 interchange.

20-4

The main entrance to Rodriguez HS is at the Red Top Road/Oakbrook Drive intersection. Increased traffic due to the Project could significantly or adversely impact this intersection and children, parents and staff commuting to or from the school. The typical commuting or drop-off and pick-up periods are from 7:30 a.m. to 9:00 a.m. and 3:00 p.m. to 4:00 p.m. The significant increase in vehicular traffic on Red Top Road will potentially create significant/adverse impacts to student safety and travel time to and from the school. The potential traffic and safety impacts to the Red Top Road/Oakbrook Drive intersection and the intersections of Red Top Road/River Drive and Red Top Road/Lopes Road require analysis and mitigation should such analysis confirm potential significant/adverse traffic impacts. Further, the road segments of Red Top Road between I-80 and I-680 must be analyzed for significant/adverse impacts due to Project-induced traffic and mitigation included for such significant/adverse impacts.

Alternative C and Alternative C, Phase 1 both include a new connector between the proposed realignment of Lopes Road and Fermi Road. Fermi Road fronts the north side of Rodriguez HS. There are three school parking lots that are accessed along Fermi Road. The Draft EIR/EIS does not appear to analyze the existing conditions, construction phase, or operation phase traffic along Fermi Road for Alternative C or Alternative C, Phase 1. As this new connector will undoubtedly increase traffic along Fermi Road in front of Rodriguez HS, the impacts to the intersections between Fermi Road and the school’s parking lots, the Watt Drive/Fermi Road intersection, and the road segments along Fermi Road, each require analysis for potential significant/adverse impacts. If such impacts are found, feasible mitigation is required.

20-5

B. Construction Traffic.

The Draft EIR/EIS discloses that construction of Alternative C, Phase 1 would take four years to complete, from 2012 to 2016. (p. 2-2.) However, it does not disclose the duration of construction near Red Top Road along the I-680 and for the new connector to Fermi Road. The numerous construction trucks that would be needed will undoubtedly cause traffic congestion, which would adversely/significantly impact children, parents, and staff commuting to and from Rodriguez HS. Similar to the traffic analysis for operations, the construction traffic analysis is also confined to highway and ramp conditions. Surface streets such as Red Top Road and Fermi Road were not analyzed. Thus, potential traffic impacts to Rodriguez HS and along Red

20-6

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Top Road and Fermi Road from the Project's construction that includes accounting for construction trucks needs to be conducted and mitigation applied to significant/adverse impacts. The Draft EIR/EIS does not disclose the potential construction truck routes or truck queue locations. The use of Red Top Road or Fermi Road for construction truck use or queuing would potentially cause significant/adverse traffic impacts to Rodriguez HS. As such, construction truck use and queuing on these roads should be prohibited and directed elsewhere.

20-6
 cont.

The District understands that a Traffic Management Plan ("TMP") will be developed later and implemented to address construction traffic impacts. (pp. 3.1.6-38 and 3.1.6-39.) However, if the potential adverse/significant construction traffic impacts to Rodriguez HS are not now identified, the TMP will not likely be developed to address such undisclosed impacts. To avoid this situation, the District requests that the analysis of construction traffic be revised and the District be allowed to review and comment on the development of the TMP to ensure such impacts are appropriately mitigated. Also, it is unclear why development of the TMP is not done as part of the EIR/EIS, but deferred to long after the Project is approved.

20-7

20-8

2. STUDENT PEDESTRIAN SAFETY.

Many students walk to Rodriguez HS and must cross Red Top Road to get there. The increased traffic on Red Top Road as a result of the Project could significantly/adversely impact student pedestrian safety. The suitability of school sites has been characterized by the California Department of Education ("CDE"), which has developed standardized requirements to ensure that school districts utilize only suitable school sites. One of these suitability standards focuses on student pedestrian safety that is specifically based upon Caltrans' own manual as referenced below:

"The [school] site shall not be on *major arterial streets with a heavy traffic pattern* as determined by site-related traffic studies including those that require student crossings unless mitigation of traffic hazards and a plan for the safe arrival and departure of students appropriate to the grade level has been provided by city, county or other public agency in accordance with the 'School Area Pedestrian Safety' manual published by the California Department of Transportation, 1987 edition, incorporated into this section by reference, in toto." (5 Cal. Code of Regs., § 14010(l), *emph. added.*)

20-9

If the Project would turn Red Top Road or Fermi Road into a "major arterial street with a heavy traffic pattern," the District's ability to redevelop Rodriguez HS in the future would be significantly/adversely impaired. Further, section 14010(n) requires a school site to "encourage student walking and avoid extensive bussing..." The Project should not be developed in such a way as to discourage student walking. Indeed, Project Objective number 4 of the Draft EIR/EIS is to "improve safety conditions." (p. 1-2.) As currently proposed and analyzed the Project does not meet this objective. Accordingly, the Project's potential impacts to student pedestrians under these CDE standards need to be conducted by Caltrans and FTA and mitigated to less than significant.

3. EMERGENCY ACCESS.

The Draft EIR/EIS divulges there will be short-term impacts on police, fire, and emergency services during construction of the alternatives. (p. 3.1.5-4.) The specific impact would be increased emergency response times caused by congestion and lane closures during construction. (*Ibid.*) As mitigation for this significant/adverse impact, the Draft EIR/EIS notes that the TMP would be provided to all emergency service providers. The analysis stops here. The District is not convinced that providing the TMP document to emergency service providers is sufficient mitigation to reduce the potential impact to less than significant. Caltrans and FTA provide no basis to conclude that the mitigated impact would be less than significant. As noted above, the construction of Alternative C, Phase 1 alone will take four years to complete. That means that emergency services to Rodriguez HS will be impaired for four years, which when considering children is

20-10

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not a short-term impact. With the increased hazards from additional construction traffic, emergency services are even more critical for our children attending Rodriguez HS. Further analysis must be conducted and additional mitigation applied to ensure that emergency services to Rodriguez HS are not impaired. At a minimum, emergency service providers and the administrators of Rodriguez HS need to review and comment upon the TMP before it is approved. Further, coordination between Caltrans, the emergency providers, and Rodriguez HS must be on going throughout the construction process.

20-10
 cont.

4. AIR QUALITY.

A. Operational Air Quality.

Figure 3.2.6-1 correctly identifies Rodriguez HS as a sensitive receptor for air quality. As with the traffic analysis in the Draft EIR/EIS, the air quality section analyzes the potential impacts from the highway segments and ramps, but does not analyze surface street impacts. In Table 3.2.6-3, the Draft EIR/EIS provides an analysis of Carbon Monoxide (“CO”) impacts at the Project’s interchanges and ramps. It does not provide a CO impact analysis of the intersections along Red Top Road, Fermi Road, or Lopes Road bordering Rodriguez HS. To determine whether the operational Project would significantly/adversely impact Rodriguez HS, the CO impact at the intersections of Red Top Road/Oakbrook Drive, Red Top Road/River Drive, and Red Top Road/Lopes Road needs to be analyzed and impacts mitigated to less than significant.

20-11

For the same reasoning, the analysis of CO impacts along road segments as presented in Table 3.2.6-4 need to be expanded to cover those segments on Red Top Road, Fermi Road, and Lopes Road that border Rodriguez HS.

In the Draft EIR/EIS, the Criteria Pollutants and Mobile Source Air Toxics (“MSAT”) are only analyzed for the highway segments, interchanges, and ramps for the operational Project. (See Tables 3.2.6-7 and 3.2.6-8.) In all Project build alternatives, dust in the form of PM10 and PM2.5 will be significantly/adversely greater than existing conditions, and nearly all toxic air pollutants from the Project’s build alternatives will be significantly/adversely greater than without the Project. The analysis stops here; it does not analyze the specific impacts from toxic air pollutants on surface streets surrounding Rodriguez HS. For the same reasons as above, the air quality analyses need to be expanded to analyze and mitigate potential operational Project toxic air quality impacts to Rodriguez HS from the Project’s Criteria Pollutants and MSAT to less than significant.

20-12

Included in the State Legislature’s and CDE’s school site suitability standards is the site’s air quality for use as a school. So as not to impair the District’s ability to redevelop the Rodriguez HS, Caltrans and FTA must analyze the Project’s potential significant/adverse impact as a hazardous air emitter along with other hazardous air emitters within ¼ of a mile of Rodriguez HS per California Education Code section 17213 and section 15186 of Title 5 of the California Code of Regulations. Specifically, a health risk assessment from the Project’s short-term (i.e., construction) and cumulative (i.e., long-term) air quality impacts on the students’ and staff’s health needs to be conducted by Caltrans and FTA. Further, if the added traffic to Red Top Road or Fermi Road causes either to become a “busy traffic corridor,” the air quality health risk assessment then also needs to account for such surface street traffic as an additional hazardous air emitter.

20-13

For toxic air pollutants, described as MSAT and Criteria Pollutant emissions, the Draft EIR/EIS states that Caltrans will consider five mitigation measures. (p. 3.2.6-23.) *Consideration* is not a *commitment*. Caltrans must commit to employing such mitigation measures to reduce the air quality impacts to less than significant.

20-14

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B. Construction Air Quality.

The Draft EIR/EIS analyzes the pollutant load from construction of the Project as a whole. (pp. 3.2.6-20 – 3.2.6.23.) Missing from the analysis is the specific potential air quality impacts to Rodriguez HS. Since only the construction as a whole was evaluated, the District does not know what the potential impacts are to the high school. A specific analysis of potential air quality impacts to Rodriguez HS needs to be done and mitigation applied to reduce impacts to less than significant. The Draft EIR/EIS reports 12 different general dust mitigation measures. One is a dust control plan that will purportedly be developed some time in the future to minimize construction impacts on existing communities. (p. 3.2.6-24.) The District requests that the dust control plan also be developed to mitigate dust impacts on Rodriguez HS and that the District be

20-15

20-16

allowed to review and comment on a draft of the dust control plan before it is finalized. Further, the District requests that the sound wall between Rodriguez HS and Lopes Road, as requested below, be installed at the beginning of the construction process to provide a physical barrier to the dust emanating from the Project's construction.

20-17

Also missing from the Draft EIR/EIS is any analysis of potential air quality impacts from construction traffic along Red Top Road and Fermi Road in the vicinity of Rodriguez HS. Since construction trucks mainly use diesel for fuel, their emissions create a hazardous air emitter that could significantly/adversely impact the children in class or participating in outdoor activities should such trucks be allowed on Red Top Road or Fermi Road. To avoid significant/adverse air quality impacts, truck routes and queue locations need to be directed away from these roads.

20-18

5. NOISE.

Among other thresholds, the Draft EIR/EIS provides exterior and interior noise thresholds for schools, playgrounds and active sport areas of 67 dBA for exterior and 52 dBA for interiors. (Table 3.2.7-1.) The Draft EIR/EIS identifies the locations of short-term noise monitoring locations. (Table 3.2-7-3.) However, no noise monitoring was conducted at or near Rodriguez HS. Rather, the closest noise monitoring location is ST-4, which is more than 1,600 feet away from the nearest edge of Rodriguez HS. ST-4 is also behind an existing noise barrier, which would attenuate the Project's noise. (See Figure 3.2.7-4.)

20-19

Although a noise prediction location, C15, at Rodriguez HS is identified on Figure 3.2.7-4, the existing noise and predicted noise from the Project at C15 is not provided in the Draft EIR/EIS. See Table 3.2.7-4 in which C15 is not included. The noise levels for C04 (aka ST-4), which is behind an existing noise barrier, are predicted to be up to 63 dBA for all alternatives. (*Ibid.*) However, there is no existing or proposed sound wall or noise barrier between Rodriguez HS and the I-680 or other parts of the Project. The District cannot discern what the Project's noise levels would be at C15 for exterior noise or in classrooms for interior noise.

20-20

It is likely that the Project's noise impact to Rodriguez HS would be significant or adverse. The Draft EIR/EIS divulges, "[N]oise levels in the project area would approach or exceed the NAC thresholds, [and thus] noise abatement must be considered." (p. 3.2.7-7.) Again, *consideration* is not a *commitment*. In addition, in Appendix B – and conspicuously not in the Noise section of the Draft EIR/EIS – it discloses that using a prediction site for existing conditions, the traffic noise modeling predicts existing noise at 53 dBA and 57 dBA with the Project. These results are incongruent with the results for C04/ST-04, which, as stated above, is behind a noise barrier, would experience 67 dBAs. The Draft EIR/EIS results should be double-checked and specific noise monitoring conducted to ensure that the predicted data is not underestimated.

20-21

Also missing from the Draft EIR/EIS is any noise analysis as a result of increased traffic on Red Top Road or Fermi Road. The Project's addition of potential construction and operational traffic on these roads need to be analyzed and mitigated to less than significant.

20-22

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The Draft EIR/EIS identifies five potential noise mitigation measures, but claims that noise barriers are the only feasible noise abatement mitigation for this Project. (p. 3.2.7-13.) In fact, two of the listed five noise mitigation measures are feasible here: (1) using design alternatives to alter the horizontal alignment of a project and (2) acquiring property to serve as a buffer zone. Others may also exist. Rather than encroaching upon the high school property to realign Lopes Road, this road can be located further east or at least kept in its current location to avoid the Project becoming closer to Rodriguez HS. There is plenty of available land for the roadway to be aligned closer to I-680 and nothing in the Draft EIR/EIS suggests that such an alignment is unfeasible. Implementing these two noise mitigation measures would reduce the Project's potential noise impacts on Rodriguez HS to less than significant.

20-23

CDE has also developed school site standards in terms of noise pollution. In section 14010(e) of Title 5 of the California Code of Regulations, sound levels cannot cause a safety problem or adversely affect the educational program. Certain portions of the education program at Rodriguez HS are conducted outdoors. As a result, the potential adverse noise impact to Rodriguez HS' educational plan needs to be analyzed and mitigated to less than significant.

20-24

In addition, a construction noise impact analysis on Rodriguez HS should be conducted as it is missing from the Draft EIR/EIS. To reduce the potential noise impacts from construction and operational noise, a noise barrier or sound wall should be constructed along the frontage of Lopes Road that borders Rodriguez HS as noise mitigation. As mentioned above, this sound wall should be constructed in the beginning of construction to provide noise mitigation for the remainder of construction.

20-25

20-26

6. LAND USE.

The Draft EIR/EIS claims that the Project is in conformity with land use goals, policies, objectives and the impact is less than significant. (See Table 4.1.) Land Use Goal LU.G-4 of the Solano County General Plan is to "[e]ncourage land use development patterns and circulation and transportation systems that promote health and wellness and minimize adverse effects on agriculture and natural resources, energy consumption, and air quality." (p. 3.1.1-14.) As discussed above, the Project's proposal to realign Lopes Road on Rodriguez HS property closer to the school's students is not in conformity with this goal to minimize adverse air quality effects. To be in conformity, Lopes Road needs to be located closer to I-680 and away from Rodriguez HS.

20-27

Objective CI-1 of the City of Fairfield General Plan is to "[e]stablish a circulation system that is consistent with the land use patterns of the city." (p. 3.1.1-17.) The Project's taking of school property is not consistent with the site's school use. These inconsistencies cause a significant impact upon Rodriguez HS. Thus, if Caltrans and FTA are going to advocate for the current proposed alignment of Lopes Road, the impact needs to be described as significant/adverse. However, feasible mitigation exists by relocating Lopes Road to the east away from Rodriguez HS. The Draft EIR/EIS should be revised accordingly.

20-28

7. SECTION 4(f).

Section 4(f) of the Department of Transportation Act of 1966 requires a special review for federally-funded transportation projects, such as this Project, that affect recreation areas, parks and historic sites. Although recognized as recreational facility for both students and the public during non-school hours, Rodriguez HS is not treated as a 4(f) resource in the Draft EIR/EIS because it claims to take a portion of the property outside the softball field fence line for Alternatives C and C, Phase 1. (p. 3.1.1-20 and Appendix B.) On this basis, it is claimed that this portion of land does not function as a recreational facility and is therefore not a Section 4(f) resource. (*Ibid.*) The District disagrees with this analysis and characterization for the following reasons, without limitation:

20-29

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(1) The precise amount of land to be taken from Rodriguez HS is not sufficiently delineated for the realignment of Lopes Road or the right-of-way to be included. Looking at Figure 3.2.7-12 in Volume 2 of the Draft EIR, the Project's boundary appears to take part of the softball field rather just outside the fence line;

(2) The High School land between the fence and Lopes Road functions as a safety buffer to those students and public members using the softball field. Considering that the Rodriguez HS property abuts Lopes Road, the right-of-way to be taken is substantial and completely erodes the safety barrier; and

(3) The encroachment of the Project on Rodriguez HS would impair the District's ability to redevelop the site in the future, as CDE's siting requirements would limit placement of school buildings and facilities.

20-29
cont.

Thus, this portion of the Rodriguez HS site serves as part of the recreational resource at the site. The Draft EIR/EIS is incorrect when it states that it is not. Accordingly, Caltrans and FTA need to conduct a complete Section 4(f) analysis on the proposed taking from the Rodriguez HS field.

8. TAKING OF FORMER GREEN VALLEY MIDDLE SCHOOL.

The Draft EIR/EIS discloses that under Alternative B and Alternative B, Phase 1, the former Green Valley Middle School will be displaced. (See Map entry #1 on Tables 3.1.4-1 and 3.1.4-2.) The criteria for a full taking are defined as:

"Where the proposed right-of-way overlapped a parcel, that parcel was considered affected by the proposed project. For parcels that did not fall completely within the right-of-way lines, those where less than 50% of the total parcel area was overlapped by the proposed right-of-way were considered partial acquisitions unless the affected portion of the parcel contained the primary structure (business or residence) on the property. Where more than 50% of the parcel would be overlapped, the parcel was considered to be fully acquired by the project alternative." (p. 3.1.4-5.)

However, it is unclear in the Draft EIR/EIS whether Caltrans and FTA are proposing a full or partial take of the former Green Valley Middle School site. If a partial take is contemplated, the extent of the taking is not defined. This has the unfortunate effect of impacting the District's current negotiations on a land swap for a new elementary/middle school site. With the scarcity of State funds and dwindling developer fees, the District finds it nearly impossible to purchase the necessary elementary/middle school site. The reality is that a land swap will provide the District with greater value than having to purchase a site from State funds or just compensation provided by Caltrans or FTA. In our experience, many times property owners are motivated by factors other than purchase price to swap properties. Further, the potential protracted delay in Caltrans or FTA taking the former Green Valley Middle School site will make it likely impossible for the District to make any progress on a new elementary/middle school site and will further impair the District's ability to provide adequate school facilities for its students. The Project should be designed to avoid taking the former Green Valley Middle School site. Again, if the District cannot swap this land for an appropriate school site in the near future as currently contemplated, the District's future plans will be in jeopardy.

20-30

9. CONCLUSION.

As discussed above, the CDE has promulgated specific regulations in Title 5 of the California Code of Regulations that impose rigid requirements on sites to be suitable for schools in terms of students' safety, health and well-being. The Project could cause the Rodriguez HS site to become ill-suited for continued use

20-31

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as a school site and as a recreational resource. The softball fields are also extensively used by public individuals and nonprofit organizations during non-school hours. Their recreational activities would also be significantly/adversely impacted by this Project's encroachment upon Rodriguez HS, and the Project's addition of fast-moving traffic along Lopes Road next to these fields. For these reasons and those described above, the District requests that analyses and mitigation identified above be conducted and presented in a revised Draft EIR/EIS for public review.

We further request that this letter be included in the Project's record of proceedings. Again, thank you for allowing the District to submit its comments on this Project. I am sure that all of us desire to protect our students from undue impacts from future development and your interest in our comments is evidence of that desire. If you have any questions or wish to consult with the District further on the matters discussed herein or on any other aspect of the Project, please do not hesitate to contact me at your earliest convenience by correspondence or by telephone at (707) 399-5148.

20-31
cont.

Sincerely,



Kim VanGundy

cc: Jacki Cottingim-Dias, Ph.D., District Superintendent
Kelly Morgan, Assistant Superintendent, Business Services
Kris Corey, Assistant Superintendent, Educational Services
Amy Gillespi-Oss, Rodriguez High School Principal
Philip J. Henderson, Esq., Orbach, Huff & Suarez LLP
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Janet Adams, Deputy Executive Director, Solano Transportation Authority

Comment Letter 20, Kim VanGundy, Fairfield-Suisun Unified School District, 10/26/10

Response to Comment 20-1

The Department acknowledges FSUSD's concerns and has reexamined these impacts areas. The Final EIR/EIS and the responses to comments below address FSUSD's areas of concern.

Response to Comment 20-2

Alternative C has been chosen as the preferred alternative. As part of Alternative C, a PG&E valve lot (a gas transmission facility) would be relocated to a vacant parcel owned by the FSUSD at the former Green Valley Middle School location at 3630 Ritchie Road in Fairfield. The relocated valve lot would occupy a 1.3-acre portion of the larger 7.69-acre FSUSD parcel. This relocation would require the acquisition of 1.3 acres from FSUSD. The 7.69-acre parcel would be divided into two separate parcels: 1) one 1.3-acre parcel for the relocated PG&E valve lot which would be acquired by STA, and 2) the remainder of the parcel (6.39 acres) for future development of which is not part of this project. The project description (in Section 2.3.5 of the Final EIR/EIS) and associated impact areas have been revised to describe this change.

Response to Comment 20-3

Alternative C would realign Lopes Road approximately 100 feet west of its current location between Fermi Drive and Red Top Road. Although realigning Lopes Road would move the road closer to Rodriguez High School, it would not impact any portion of the school including its recreational fields. Since the publication of the draft EIR/EIS, the Lopes Road realignment has been modified to fully avoid any impact on the school including landscaped areas beyond the outfield fence of the school's softball field. This change in the project design would avoid any direct or indirect effect on the school. Figures 2-3 and 2-5 of the project description depict these changes; associated impact areas have been revised to describe this change as well. Responses below address the District's detailed comments regarding potential impacts to student's safety, health and learning environment.

Response to Comment 20-4

Please refer to the response to comment 12-2 for a detailed description of the traffic effects of the proposed project on Red Top Road in the vicinity of Rodriguez High School. Though Alternative C has been selected, both build alternatives and their fundable first phases would actually not result in any significant increase in traffic levels. In many cases, the project would improve (or reduce) traffic levels on Red Top Road in the vicinity of the High School because traffic congestion on I-680 and I-80 and through the I-680/I-80 interchange would be reduced and there would be less incentive for motorists to exit from the freeway system to avoid congestion and delay. Additionally, signage will be provided to direct traffic exiting NB I-680 to access WB I-80 to use Lopes Road north to the I-80/Green Valley Road interchange.

The commenter expresses concern that construction of Alternative C-1 would result in increased traffic along Red Top Road in front of Rodriguez HS that could significantly or adversely affect intersection operations and affect student safety and travel times.

Based on the 2035 traffic forecasts, without the project (No-Build Alternative), Red Top Road east of I-80 would have approximately 2,095 vehicles in the AM peak hour and 2,445 vehicles in the PM peak hour. With Alternative C, Phase 1, traffic projections forecast 1,605 vehicles for the same location in the AM peak hour and 2,460 vehicles in the PM peak hour. This represents a 23 percent reduction in the number of AM peak hour trips and less than a 1 percent increase in the number of PM peak hour trips as a result of constructing Alternative C, Phase 1. Thus, traffic operations adjacent to the school are expected to remain the same or improve with the project.

Generally with increased traffic there is a corresponding increase in congestion-related (rear-end type) accidents. A decrease in congestion generally results in fewer congestion-related accidents. Thus, Red Top Road is expected to be a safer facility with the construction of Alternative C, Phase 1 than with the No-Build Alternative (without the project).

Response to Comment 20-5

The local roadway shown in Figures 2-2 through 2-5 is a realignment of Fermi Road; Fermi Road must be realigned due to the realignment of Lopes Road and the new interchange. Fermi Road will be relocated solely to connect to the realigned Lopes Road. Alternative C, Phase 1 is not anticipated to result in additional traffic on Fermi Road compared to the No-Build Alternative. Drivers using Fermi Road after the implementation of Alternative C, Phase 1 would be the same drivers who currently use the road. Thus, the new configuration of Fermi Road is not expected to affect regional travel routes, and the traffic volumes are thus expected to be similar for all build alternatives. Construction impacts are addressed in response 20-6 below.

Response to Comment 20-6

Construction truck traffic on local roads will be analyzed as part of the development of Transportation Management Plans (TMPs) for each construction phase. Detailed TMPs cannot be prepared prior to the definition of each project phase, as local conditions and the presence of prior phases affect items such as truck routes, locations of staging areas, employee parking areas, detour routes, etc. For the project phases affecting the Red Top Road/Fermi Drive area, the school's special needs will be considered, including:

- Limiting or prohibiting truck traffic on Red Top Road along the school frontage during school operating hours;
- Minimizing instances where traffic detours include Red Top Road along the school frontage;
- Avoiding construction activities that affect access to school parking lots off Fermi Drive.

Please also refer to response to comment 20-7.

Response to Comment 20-7

Transportation Management Plans (TMPs) are specific to individual project construction packages, and are very detailed in describing the detour routes, their signage and hours of operation, construction staging areas, employee parking areas, noise and air quality management, and other practices to be followed. Such details have not been developed at this time, but will be developed during the final design phase when specific project construction packages are identified, the work schedules are defined, and prevailing traffic, pedestrian, bicycle and transit conditions near the time of construction are studied and incorporated.

The Department and STA will ensure that FSUSD and Rodriguez High School staff are included in the development and review of the TMPs for any construction packages for this I-80/I-680/SR 12 Interchange Improvement project that include work on Red Top Road and in the vicinity of District facilities.

Response to Comment 20-8

The environmental consequences of construction-period truck traffic was included in the EIS/EIR and not deferred until after project approval. The EIS/EIR concludes that either project alternative would entail additional truck and construction worker traffic, temporary lane closures and detours, and various construction-related activities that would increase congestion to varying degrees throughout the construction period. In addition, minimization measures were included in the EIS/EIR and not deferred until after project approval. The EIS/EIR includes the requirement to prepare and implement a TMP. As noted in response to comment 20-7 development of a detailed TMP is specific to individual project construction packages with input from the construction contractor. However, the minimization measure includes specific requirements and measures to be included in the TMP (see Section 3.1.6) to ensure the TMP is effective in reducing construction-period effects.

Response to Comment 20-9

No increase in traffic on Red Top Road due to the project is projected when compared to the No Build; consequently, there is no need to reclassify the roadway as a major arterial. While Red Top Road is a two-lane roadway just south of the I-80 eastbound ramps intersection, it widens out to a four-lane landscaped roadway with turn pockets and a traffic signals at Watt Drive, the Rodriguez High School entrance, and Lopes Road. This lane configuration and traffic control is appropriate for the traffic levels associated with a 2,200-student high school and adjacent residential and industrial uses. Further, the Lopes Road realignment between Red Top Road and Fermi Drive will also include sidewalks. The project will not result in changes that would decrease or discourage walking as a mode of transportation to and from the high school.

Response to Comment 20-10

The Transportation Management Plan will not just be provided to emergency service providers. The TMP will be developed with direct input from emergency service providers including the police, fire department, and ambulance services affected by the project. Emergency service providers will be given adequate advance notice of any street closure or detour. Advance notice allows the emergency service provider to adjust response routes to minimize potential delays. As noted in response to comment 20-7 development of a detailed TMP is specific to individual project construction packages with input from the construction contractor. However, the minimization measure includes specific requirements and measures to be included in the TMP (see Section 3.1.6) to ensure the TMP is effective in reducing construction-period effects. As requested by the District, the District will be provided the TMP in advance to allow input and coordination of construction activities with High School operations to minimize construction-period effects.

Response to Comment 20-11

Project-level air quality analyses are performed on intersections with the worst-case traffic conditions. If the analysis concludes that no ambient air quality standards will be exceeded, then intersections with less severe traffic conditions would also not exceed ambient air quality

standards. As indicated in Section 3.2.6 of the Draft EIR/EIS, the roadway intersections and segments with the highest traffic volumes and worst levels of congestion/delay) were analyzed in the CO analyses. The analysis concluded that no violation of the NAAQS or CAAQS would occur at these intersections or segments as a result of project implementation. Thus, no violations are anticipated at other roadway intersections and segments with less traffic volumes and congestion/delay in the study area.

Response to Comment 20-12

The MSAT evaluation was prepared in accordance with FHWA MSAT guidance. As indicated in the analysis, accepted methods to evaluate localized MSAT effects are currently not available. Mitigation measures to reduce MSAT emissions are identified in the Draft (and Final) EIR/EIS in Section 3.2.6.

Response to Comment 20-13

MSAT language has been updated to reflect the FHWA's 2009 MSAT guidance, which supersedes the FHWA's 2006 MSAT guidance used in the Draft EIR/EIS. The FHWA's MSAT guidance regarding incomplete or unavailable information for compliance with 40 CFR 1502.22 indicates that "In FHWA's view, information is incomplete or unavailable to credibly predict the project-specific health impacts due to changes in MSAT emissions associated with a proposed set of highway alternatives." Consequently, the HRA analysis conducted for the Draft EIR/EIS is sufficient to characterize potential health risks associated with implementation of the project.

Response to Comment 20-14

The Department will evaluate all mitigation measures identified in the Draft EIR/EIS and implement those to be found feasible.

Response to Comment 20-15

Please refer to response to Comment 20-13.

The Draft EIR/EIS evaluated emissions associated with construction and operation of the project, as well as an evaluation of CO and MSAT effects. It was found that construction-related air quality impacts would be less than significant.

Response to Comment 20-16

Per the Department's Standard Specification Section 14-9.01, a dust control plan will be prepared prior to construction (Section 3.2.6 of the Draft and Final EIR/EIS). The dust control plan will be provided to FSUSD for review and input. Standard Specification Section 14-9.01 specifically requires compliance by the contractor with all applicable laws and regulations related to air quality, including air pollution control district and air quality management district regulations and local ordinances. Measures specified in the Draft EIR/EIS will ensure that construction dust impacts are minimized and therefore a temporary soundwall to reduce dust is not warranted. The mitigation measures require daily sweeps of construction sites and paved roads, hydroseeding or watering of all active construction areas, and limiting traffic speeds to minimize airborne dust all of which will greatly reduce dust emissions during construction and potential dust impacts on all surrounding land uses.

Response to Comment 20-17

Please refer to response to comment 20-16. Measures already included in the Draft EIR/EIS are sufficient to reduce potential dust impacts thereby not requiring the need to construct a temporary noise wall for dust reduction purposes.

Response to Comment 20-18

The Department and STA are committed to rerouting truck traffic away from the vicinity of the high school when school is in session.

Response to Comment 20-19

Noise monitoring was focused primarily on the capacity-increasing segments of I-680, I-80, and SR 12, because that is where traffic noise impacts would be expected to occur as a result of the project. Monitoring sites were selected at locations within 500 feet of these facilities, consistent with the Department's protocol. The edge of the nearest outfield at Rodriguez High School is 900 feet from I-680, so it was not selected for noise monitoring. However, the realignment of Lopes Road would pass within 500 feet of the ball field, so a noise prediction site C15 was modeled at the high school's outfield to disclose predicted noise levels at the high school property.

The Noise Study Technical Report concluded that the predicted traffic noise level at the Rodriguez High School site (predicted noise location C15 in the Noise Study Technical Report) would be 57 dBA under all build alternatives. This predicted noise level is well below the impact threshold of 66 dBA for an Activity Category B land use, such as Rodriguez High School and thus not considered adverse or significant and not warranting evaluation of noise abatement for this land use. A copy of the Noise Study Technical Report will be provided to the FSUSD.

Response to Comment 20-20

Table 3.2.7-4 in the Draft and Final EIR/EIS summarizes predicted traffic noise levels at representative locations along the I-80/I-680 corridor. The table is a condensed version of the noise modeling analysis table that appears in Appendix C of the Noise Study Technical Report. The intent of summarizing the table is to highlight locations that would experience traffic noise impacts due to the project, and also include representative locations adjacent (i.e., within 500 feet) to the primary capacity-increasing segments of I-80, I-680 and SR 12. The summary format of Table 3.2.7-4 was used to simplify the data presentation and focus on areas where traffic noise impacts are predicted to occur as a result of the project. A full report of the noise analysis locations is included in Appendix C of the Noise Study Technical Report. A copy of the Noise Study Technical Report will be provided to the FSUSD.

The Noise Study Technical Report concluded that the predicted noise level at the Rodriguez High School site (predicted noise location C15 in the Noise Study Technical Report) would be exposed to a traffic noise level of 57 dBA under all build alternatives. This predicted noise level is below the impact threshold of 66 dBA for an Activity Category B land use, such as Rodriguez High School. A noise barrier was not evaluated for the high school because noise impacts requiring abatement are not predicted to occur there as a result of the project.

Response to Comment 20-21

Noise levels in Area C, the area where Rodriguez High School is located, do not approach or exceed 67 dBA. The results of the Noise Study Technical Report concluded that the predicted noise level at Rodriguez High School (predicted noise location C15 in the Noise Study Technical Report) would be exposed to a traffic noise level of 57 dBA with the project under all build alternatives.

Please note that the noise modeling results presented in Table 3.2.7-4 is a summary of the full list of receivers shown in Appendix C of the Noise Study Technical Report, as described in the response to the comment above. The primary intent of the table is to disclose all noise impacts due to the project, where they occur. The supporting data for the noise analysis is fully documented in the technical report. See response to comment 20-19 regarding noise monitoring.

Response to Comment 20-22

The project does not increase capacity on Red Top Road or Fermi Road. Therefore traffic noise on Red Top Road and Fermi Road was not studied in this report. Further, construction activities are not likely to result in noise impacts at the high school. Due to the distance of the school to construction areas, construction-generated noise levels at the school are not expected to be significant. Construction noise would be short-term, intermittent, and masked by local traffic noise. Please refer to response to comment 20-25 for a discussion regarding construction-noise impacts and minimization measures.

Response to Comment 20-23

As described above in response comment 20-2, under Alternative C, since the publication of the Draft EIR/EIS, the Lopes Road realignment has been modified to avoid displacing landscaping areas beyond the outfield fence of the school's softball field as originally analyzed. With this modification to the project description, the landscaped area of concern would not be affected.

However, the location of the existing Red Top Road/Lopes Road intersection is fixed. The proposed alignment for the relocated Lopes Road is based upon a combination of needing to connect to existing Lopes Road at the northerly and southerly ends, the proposed I-680 alignment and the design speeds of the two facilities. As such, Lopes Road cannot be realigned to be closer to I-680.

Further, acquiring property to serve as noise abatement to buffer noise impact to the high school is not warranted based on the noise analysis contained in the EIR/EIS which determined that future noise levels under all build alternatives would be well below the impact threshold of 66 dBA.

Response to Comment 20-24

The commenter refers to this section of the CCR:

“All districts shall select a school site that provides safety and that supports learning. The following standards shall apply: The site shall not be adjacent to a road or freeway that any site-related traffic and sound level studies have determined will have safety problems or sound levels which adversely affect the educational program.”

As described in the Noise Study Technical Report, the noise prediction site at C15 (at Rodriguez High School's softball field adjacent to Lopes Road) is approximately 100 feet from the proposed realignment of Lopes Road. Site C15 can be considered as a screening-level analysis to determine if traffic noise impacts due to the project would be of concern on the school property. Future traffic noise levels due to the project are not predicted to result in a traffic noise impact at site C15.

The Noise Technical Report concluded that the proposed project will not cause noise levels that would interfere with use of outdoor areas at the high school for educational purposes. Thus, traffic noise due to the project is not expected to result in noise impacts in interior or exterior classroom spaces, nor would it result in reduced ability to discern speech.

Response to Comment 20-25

Noise generated by construction equipment at a distance of 50 feet range from 80 dBA to 89 dBA. The distance from the proposed realigned Lopes Road to the outfield fence of the school's softball field is approximately 150 feet. Noise produced by construction equipment would be reduced over distance at a rate of about 6 dB per doubling of distance. Due to this distance, construction-generated noise levels would be reduced by approximately 12 dB at the outfield fence. Construction noise is also short-term, intermittent, and would be masked in-part by local traffic noise. Minimization measures in Section 3.2.7 of the Draft and Final EIR/EIS would require the use of sound-control devices on construction equipment, rescheduling construction activities to non-sensitive hour of the day, and advance noticing to sensitive receptors to further reduce construction-noise impacts. Based on the analysis conducted and minimization measures included in the EIS/EIR construction-period noise effects at the High School would not be significant.

Response to Comment 20-26

Please refer to response to comment 20-25 above.

Response to Comment 20-27

The project and the realignment of Lopes Road have benefits that support the position of consistency with the land use goal of the Solano County General Plan. As described above in response comment 20-2, under Alternative C, since the publication of the Draft EIR/EIS, the Lopes Road realignment has been modified to avoid displacing landscaped areas beyond the outfield fence of the school's softball field as originally analyzed. Further, the realigned portion of Lopes Road between Red Top Road and Fermi Drive will include sidewalks, improving pedestrian safety. As discussed in responses to comments 20-11, 20-12, 20-13, 20-16, and 20-17, air quality analyses conducted for the project determined that no ambient air quality standard would be exceeded and that measures have been included to reduce MSAT and construction period air quality impacts.

Response to Comment 20-28

The project is consistent with Objective CI-1 of the City of Fairfield General Plan, to establish a circulation system that is consistent with the land use patterns of the city. As described above in response comment 20-2, under Alternative C, since the publication of the Draft EIR/EIS, the Lopes Road realignment has been modified to avoid displacing landscaped areas beyond the

outfield fence of the school's softball field as originally analyzed. The landscaped area of concern would not be affected.

Response to Comment 20-29

As described above in response comment 20-2, under Alternative C, since the publication of the Draft EIR/EIS, the Lopes Road realignment has been modified to avoid displacing landscaped areas beyond the outfield fence of the school's softball field as originally analyzed. The landscaped area of concern would not be affected. The Department and STA share the concerns of FSUSD regarding student safety and will work with FSUSD to implement measures to increase safety.

Response to Comment 20-30

As described above in response to comment 20-2, as part of Alternative C, a PG&E valve lot (a gas transmission utility) would be relocated to a vacant parcel owned by the FSUSD at the former Green Valley Middle School location at 3630 Ritchie Road in Fairfield. The relocated valve lot would occupy a 1.3-acre portion of the larger 7.69-acre FSUSD parcel. This relocation would require the acquisition of 1.3 acres from FSUSD. The 7.69-acre parcel would be divided into two separate parcels: 1) one 1.3-acre parcel for the relocated PG&E valve lot which would be acquired by STA, and 2) the remainder of the parcel (6.39 acres) for future development of which is not part of this project. The project description (in Section 2.3.5 of the Final EIR/EIS) and associated impact areas have been revised to describe this change.

With this change in the project description, the Department and STA have been in discussions with the FSUSD about purchasing all or a portion of the former Green Valley Middle School site. In these discussions, FSUSD has indicated their interest in such a purchase and that it could facilitate their goals of establishing a new elementary school site elsewhere in the city of Fairfield.

Response to Comment 20-31

The Department and STA acknowledge FSUSD's concerns regarding the potential impacts of the proposed project on the high school and on the former Green Valley Middle School site and have responded to these concerns as described above.



Linda S. Adams
Secretary for
Environmental Protection

California Regional Water Quality Control Board

San Francisco Bay Region

1515 Clay Street, Suite 1400, Oakland, California 94612
(510) 622-2300 • Fax (510) 622-2460
<http://www.waterboards.ca.gov/sanfranciscobay>



Arnold Schwarzenegger
Governor

Letter 21

October 27, 2010
CIWQS Place No.: 728678

Sent via electronic mail: No hard copy to follow

California Department of Transportation
Attn: Howell Chan
Howell_Chan@dot.ca.gov
P.O. Box 23660
Oakland, CA. 94623-0660

SUBJECT: Draft Environmental Impact Report for the Interstate 80/Interstate 680/State Route 12 Interchange Project (SCH No. 2003052021)

Caltrans Project No.: EA 0A5300

Dear Mr. Chan:

Thank you for giving San Francisco Bay Regional Water Quality Control Board (Water Board) staff the opportunity to review the Draft Environmental Impact Report (DEIR) for the Interstate 80/Interstate 680/State Route 12 Interchange Project (Project). The Project proposed by the California Department of Transportation (Department) involves improvements to the Interstate 80 (I-80)/Interstate 680 (I-680)/State Route 12 (SR 12) interchanges and relocation of the westbound truck scales facility in the vicinity of the city of Fairfield, Solano County. The Department is proposing improvements on an approximate 4.5-mile-long segment of I-80 between Red Top Road and Abernathy Road, an approximate 3.5-mile-long segment of I-680 between Gold Hill Road and I-80, 2.0-mile-long segment of SR 12 West (SR 12W) between 0.5 mile west of Red Top Road and I-80, and an approximate 2.5-mile-long segment of SR 12 East (SR 12E) between I-80 and Main Street in Suisun City.

21-1

Two different Project alternatives are presented in the DEIR, with two accompanying “fundable first phases” that the Department has provided separate impact totals for. This comment letter does not consider the impacts of these first phases separate from the overall Project proposal, as it is assumed that the Department intends to implement the entire Project and rely on the DEIR as its CEQA environmental review document; as such, impacts for the entire Project must be evaluated simultaneously, and not be considered piecemeal under a presumption that potential impacts may be less because a later stage of the Project is not yet funded.

California Environmental Protection Agency



The formal DEIR comment period ended October 18, 2010, however, the Water Board has reviewed the DEIR and has the following important concerns that the Department must consider to prevent future permitting delays.

21-2

Mitigation and Impacts to Jurisdictional Wetlands, Waters, and Riparian Resources

Depending upon the chosen design alternative, the proposed Project would permanently impact approximately 17 or 19 acres¹ of jurisdictional wetlands and waters, and temporarily impact approximately 8.3 or 4.7 acres of jurisdictional wetlands and waters.

Avoidance and Minimization of Permanent Impacts

The Department must fully evaluate all avoidance options to reduce the significant level of proposed permanent impacts to jurisdictional resources. Page 3.2.2-7 of the DEIR notes that, “[E]xcept at bridges, no retaining walls are anticipated.” The Department has a history of utilizing retaining walls to avoid and minimize direct fill to wetlands, yet, the limited use of retaining walls suggests that the Department may not have fully investigated, or reported, all opportunities and efforts to avoid and minimize impacts to jurisdictional resources through use of retaining walls. The Department must provide a discussion of its impact avoidance and minimization efforts with respect to incorporation of retaining walls into the Project design.

21-3

The Water Board supports the Department’s proposal to remove existing piers and supports from the creek beds of Dan Wilson and Suisun Creeks, and to replace the associated bridges with clear-span bridges. However, bridges with supports and/or piers below ordinary high water are being proposed over Ledgewood Creek to accommodate the SR 12 on- and off-ramps. Ledgewood Creek provides habitat for the federally-listed Central California Coast Steelhead, and Chinook salmon, a federal species of special concern. Installation of piers below the ordinary high water mark of Ledgewood Creek may negatively affect habitat for these species. To demonstrate the Department has fully avoided and minimized impacts to Ledgewood Creek and special-status salmon, the feasibility of clear-span bridges over Ledgewood Creek must be evaluated.

21-4

Temporary Impacts to Wetlands from Construction Access

The Department proposes approximately 7.2 or 3.6 acres of temporary impact to jurisdictional perennial marshes, alkali seasonal marshes, and seasonal wetlands, depending upon the chosen Project alternative. The DEIR doesn’t describe, in detail, the activities that will result in temporary impacts, and the nature of the temporary impacts to the wetlands. If temporary impacts are proposed as a result of construction access, then the Department must discuss the

21-5

¹ All impact totals cited in this letter that follow the format, “The Department proposes to impact X or Y acres, depending upon the chosen project alternative,” refer to X or Y acres of impact proposed in Project alternatives B and C, respectively.

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activities that will be done atop the identified wetlands, as well as the avoidance and minimization measures that will be employed.

21-5
cont.

Although the DEIR doesn't specify that geotextile and aggregate are proposed to minimize impacts to wetlands, the Department has previously proposed temporary fill of wetlands with these materials to allow for a construction platform or staging area, while maintaining that the underlying wetlands would be protected. Use of geotextile and aggregate as a heavy equipment construction platform would most likely result in compaction of wetland soils, degradation of wetland hydrology, and the high likelihood of aggregate material being discharged to wetlands. The Department must avoid compaction of the wetland soils to avoid permanent impacts to wetlands. A timber mat system is a significantly less environmentally damaging alternative than use of geotextile and aggregate. A timber mat would redirect a significantly greater amount of tension upward, away from the wetland when compressive forces are applied. The Final EIR should identify the nature of the proposed temporary impacts and propose the least environmental damaging practicable alternative for protecting wetlands during construction access, such as a timber mat system. The Department must also design the Project to minimize the time duration that any access roads or staging areas are employed within any wetlands.

21-6

21-7

Impacts to and Mitigation for Linear Features

Please note that impacts to waters classified in the DEIR as "perennial drainages" and "jurisdictional seasonal drainages," will be evaluated by the Water Board not only in terms of acreage, but also the linear feet of impact. The DEIR did not provide the linear feet of impact to these jurisdictional features. After the Department has demonstrated full avoidance and minimization of impacts to jurisdictional waters, the Water Board will require riparian mitigation for impacts to perennial creeks at a location in the same watershed as the Project. The Water Board will not accept areal, wetland-type mitigation as mitigation for impacts to perennial creeks; the mitigation must be riparian in nature and proposed in terms of the linear feet of benefit to be provided. Depending upon the beneficial uses being provided by the permanently impacted jurisdictional seasonal drainages, areal, wetland-type mitigation may, or may not be permitted for permanent impacts to those jurisdictional features.

21-8

As noted in our "Comments Relating to the I-80/I-680/SR 12 Interchange Project NEPA/404 Integration MOU Checkpoint Meeting" letter, addressed to the Department and dated June 5, 2007, the Water Board expects the Department to identify riparian restoration opportunities in the vicinity of the Project site. The DEIR mentions the possibility of providing mitigation at the Lynch Canyon Open Space Preserve in collaboration with the Solano Resource Conservation District and Solano Land Trust. The Water Board supports this mitigation option. However, as noted in our June 2007 letter, the Water Board will not accept riparian mitigation bank credits (as proposed on DEIR pg. 3.3-17) for any impact associated with Project implementation.

21-9

Page 3.3-59 of the DEIR discusses Chinook salmon and Central California Coast steelhead fish passage conditions in Ledgewood Creek, beneath eastbound SR 12, and notes that "[R]esults

21-10

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from modeling conducted for the fish passage assessment indicate that the proposed extension of the culvert under SR 12E would exacerbate existing shallow water conditions during the migration season and would worsen fish passage conditions relative to current conditions.” The DEIR then proposes installation of low-flow walls or offset baffles as mitigation for this impact. The Department must evaluate the feasibility of replacing the existing box culvert with a clear-span bridge at this location. The Water Board may consider Project mitigation credit for such a retrofit.

21-10
cont.

Riparian Impacts and Mitigation

Project implementation would result in approximately 1.3 or 1.1 acres of permanent impacts to riparian woodland, depending upon the chosen Project alternative. Page 3.3-8 of the DEIR notes that “permanent loss of riparian vegetation will be compensated for at a ratio to be determined in cooperation with the California Department of Fish and Game (CDFG).” Please note that the Water Board also has jurisdiction of riparian woodland; adequacy of any proposed mitigation must be determined in cooperation with the Water Board, as well as CDFG.

21-11

Waste Discharge Requirements

Please be aware that because the Department is projecting a significant area of permanent impact to jurisdictional waters and wetlands, it is possible the Project may require the review of Waste Discharge Requirements/401 Certification before our Board, which tends to be a lengthier certification process than issuance of a 401 certification signed by the Water Board Executive Officer. To the degree the Department can reduce permanent impacts to jurisdictional waters and wetlands, the possibility the certification will need to go before our Board will be reduced. Should the Department be unable to significantly reduce projected permanent impacts, we highly recommend consulting with Water Board staff and identifying potential mitigation opportunities as soon as possible.

21-12

Post-Construction Stormwater Runoff Impacts

Depending upon the chosen design alternative, the Department is proposing either approximately 128 or 123 acres of new impervious surface, and either approximately 252 or 220 acres of reworked impervious area. Impervious areas would be a source of automobile-related pollutants and may result in alterations to local hydrology.

Pollutant Treatment

As noted in the Study, the Water Board will require the Department provide treatment of stormwater runoff from new and reconstructed areas of impervious surface. Specifically, the Water Board shall require treatment of stormwater runoff from a Project area equivalent to the area of all new and redeveloped impervious surface.

21-13



media with a depth of no less than eighteen inches. The soil media shall be approximately 50% - 70% sand and 30% - 40% compost. The mix may also include topsoil or other soil ingredients with clay content not exceeding 3% overall. These soil media specifications may be altered to conform with alternative mixes that have been demonstrated to effectively filter stormwater pollutants and provide at least 5 inches per hour permeability over the long term. The Bay Area Stormwater Management Agencies Association (BASMAA) is currently developing specifications for a soil mix that will be used by municipalities to meet treatment requirements of the recently issued Municipal Regional Permit². The Department may utilize the final BASMAA soil mix specification, or the current Contra Costa Clean Water Program (CCCWP) soil mix³, which is very similar to the BASMAA mix under development. Until the BASMAA soil mix is accepted by the Water Board, the Department should use an engineered soil mix based on the above criteria, such as the CCCWP criteria.

21-13
cont.

Page 3.2.2-9 of the DEIR notes that “[B]ecause of the limited permeability of the soils and potentially high groundwater, infiltration devices and other filters allowing percolation of stormwater back into the ground are not a consideration.” The Water Board does not find that this statement, by itself, releases the Department from consideration of biofiltration swales, designed as specified above. Page 3.2.2-12 of the DEIR notes that groundwater levels in the Project area range from three feet to 18 feet below ground surface. Biofiltration swales may be feasible in locations where groundwater is as low as approximately 3.5 feet below the ground surface. Underdrains may also be used in instances where backing-up of stormwater is a concern. If the Department proposes swales that are not designed in a manner consistent with the above guidelines, full treatment credit will not be granted for those swales.

Hydromodification

Added impervious areas may result in alterations to existing hydrologic regimes, resulting in erosion and/or changes of sediment transport in receiving waters (hydromodification). The Water Board finds that due to the significant amount of added impervious area, the proposed project may cause hydromodification impacts to receiving waters.

The DEIR does not address potential hydromodification effects that may result from Project implementation; Page 3.2.2-6 of the DEIR notes that “the exact amount of new or reconstructed pavement tributary to each waterway for each project alternative has not been determined at this phase of the project.” The DEIR is lacking a proper assessment of potential hydromodification impacts; hydromodification effects to the Project’s receiving waters cannot be assessed if the area of proposed new impervious area draining to those waters has not been determined. The DEIR infers on page 3.3-97, that there would be a less-than-significant impact to special status fish species as a result of changes in channel morphology, in part, because “no long-term changes to channel morphology are expected.” However, an analysis of potential hydromodification impacts to each of

21-14

² Water Board Order No. R2-2009-0074, NPDES Permit No. CAS612008

³ http://www.cccleanwater.org/Publications/Guidebook/AppendixB_1-21-09_xc3-17-09.pdf

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the creeks has not been performed, and therefore, the Department has not done the necessary exercise(s) to determine any likelihood of permanent changes to creek morphology, and any resultant impacts to habitat of special status fish species.

The Department must characterize the extent project implementation will result in hydromodification impacts, and propose mitigation for any significant impacts. Waste Discharge Requirements and/or 401 water quality certification will not be issued by the Water Board for any portion of the Project until hydromodification impacts have been evaluated and appropriately mitigated.

21-14
cont.

Waters of the State

Page 3.3-17 of the DEIR notes that “Drainages that are not under USACE jurisdiction but have beneficial uses would be considered waters of the State that would be regulated by the RWQCB...” Waters of the State are defined in the Porter-Cologne Water Quality Control Act as “any surface water or groundwater, including saline waters, within the boundaries of the state.” The presence of beneficial uses may be a consideration in determining if an aquatic resource is a State water, however, it is not a requisite attribute; *potential* beneficial uses may also be a consideration in determining whether an aquatic resource is a waters of the State. For instance, a cement-lined drainage has the potential to provide groundwater recharge and wildlife habitat, although, the cement lining may be preventing that drainage from possessing these beneficial uses. Similarly, a wetland may have been degraded by localized hydrological or direct physical alterations, but the beneficial uses of that wetland may be restored by reversion of those alterations.

21-15

No Net Loss

In the Cumulative Impacts section of the DEIR, page 3.6-6, the Department states that, “the cumulative impacts of the proposed project in combination with other existing and reasonably foreseeable projects on wetland resources would be reduced to a less than significant level through implementation and compliance with the no net loss requirements under Section 404 of the Clean Water Act.” This section incorrectly states that the Clean Water Act requires no net loss of wetlands. No net loss of wetlands refers to a federal policy that establishes a goal to achieve no net loss in the functions and values of the nation’s wetlands. The existence of the policy does not guarantee that cumulative impacts to wetlands will be reduced to a less-than-significant level; it is recognized in the *Memorandum of Agreement Between The Department of the Army and The Environmental Protection Agency, The Determination of Mitigation Under the Clean Water Act Section 404(b)(1) Guidelines*⁴, that, “no net loss of wetlands functions and values may not be achieved in each and every permit action.” The language in this section of the DEIR should be revised to omit reference to no net loss as a requirement. Additionally, this section should not make a claim that existence of the no net loss policy will ensure that cumulative impacts to wetlands will be reduced to a less-than-significant level.

21-16

⁴ <http://water.epa.gov/lawsregs/guidance/wetlands/mitigate.cfm>

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Mr. Howell Chan
California Department of Transportation

- 7 -

Draft EIR Comments: I-80/I-680/SR 12 Interchange Project
CIWQS Place No.: 728678

Water Board staff look forward to meeting with Department and other resource agency staff to discuss the Project and further avoidance and minimization options. If you have any questions, comments, or concerns, please contact me at (510) 622-2506, or via e-mail to BThompson@waterboards.ca.gov.

Sincerely,



Brendan Thompson
Environmental Specialist

cc (via e-mail): State Clearinghouse
Mr. Hardeep Takhar, Caltrans
Mr. Dale Bowyer, Water Board
Ms. Melissa Escaron, CDFG
Ms. Shin-Roei Lee, Water Board
Ms. Melanie Brent, Caltrans
Mr. John Cleckler, USFWS

Ms. Carolyn Mulvihill, EPA
Ms. Andrea Meier, USACE
Ms. Janet Adams, STA
Ms. Maggie Townsley, ICF International
Mr. Cyrus Vafai, Caltrans
Ms. Jacqueline Pearson-Meyer, NOAA/NMFS

California Environmental Protection Agency



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Comment Letter 21, Brendan Thompson, Environmental Specialist, California Regional Water Quality Control Board, 10/27/10

Response to Comment 21-1

Comment noted.

Response to Comment 21-2

Comment noted.

Response to Comment 21-3

During the final design phase, the designers will review opportunities to avoid and minimize impacts to jurisdictional wetlands through the use of steeper embankment slopes (2:1 instead of the advisory design standard 4:1 slope) and retaining walls. A mitigation measure was added for Alternatives C and C, Phase 1 (see Section 3.3.5.1) that reduces potential impacts on wetlands by revising the project design to include a retaining wall of the south side of SR 12E.

Response to Comment 21-4

The feasibility of constructing a clear-span bridge over Ledgewood Creek with improvements to SR 12E has been reviewed as a part of Alternative C, Phase 1 and has been determined to not be feasible at this time. The existing SR 12E crossing over Ledgewood Creek consists of a 5-cell, 106 foot long box culvert. Alternative C, Phase 1 would widen SR 12E by one lane in the eastbound direction (a total of 14 feet, 12 foot lane plus 2 feet shoulder widening). It is not feasible or cost effective to replace the existing box culvert with a new bridge to accommodate the incremental widening proposed in Alternative C, Phase 1 due to cost and traffic handling. Further, it is not possible to close the regional facility to raise the profile of SR 12 and replace the box culvert with a bridge. This option may be re-examined as a part of a future phase for Alternative C, should additional funding be identified.

Response to Comment 21-5

Temporary activities atop wetlands are likely to result from light grading and storm water quality improvements, but could also result from construction access through a confined working space or equipment operating in areas constructing permanent improvements.

Response to Comment 21-6

Comment noted. The use of geotextile and aggregate will be avoided in wetlands; timber mats and other methods to minimize compaction of wetland soils will be used.

Response to Comment 21-7

Construction staging plans will be developed during the final design phase, taking into account public safety, right-of-way limits, environmental and permitting construction windows, and logical, feasible construction sequencing. To the extent feasible, duration of temporary impacts to wetlands will be minimized.

Response to Comment 21-8

Impacts to perennial and seasonal drainages have been quantified and added in a new column in Tables 3.3.2-1 through 3.3.2-4 in Section 3.3.2.1 of the Final EIR/EIS. Mitigation proposed for

impacts to perennial creeks are riparian in nature, but the mitigation in Section 3.3.2.1 has been modified to include the requirement for compensation to be in terms of linear feet of benefit provided, rather than in acres.

Response to Comment 21-9

The Department and STA are currently investigating riparian restoration opportunities on properties in the immediate vicinity of the project. The Department and STA have prepared a draft conceptual mitigation plan as part of the formal NEPA/404 integration process which the RWQCB has participated and provided input.

Response to Comment 21-10

As noted in the response to comment 21-4, it is not feasible or cost effective to replace the existing box culvert with a clear span bridge as a part of the improvements for Alternative C, Phase 1. Replacing the existing box culvert with a bridge would require raising the profile of SR 12 by approximately 6 feet to accommodate the bridge superstructure remaining above the LedgeWood Creek water surface elevation during flood events. To replace the culvert with a clear span structure would entail closing SR 12E for nearly a year and no detour would be feasible as part of Alternative C, Phase 1. Under Alternative C, traffic could be detoured through the proposed Beck Avenue interchange, though it would entail considerable overbuilding of the ramps to accommodate the detour traffic. Therefore, while constructing a clear span bridge over LedgeWood Creek is not feasible as part of Alternative C, Phase 1, it may be re-examined as a part of a future phase for Alternative C, should additional funding be identified.

Response to Comment 21-11

Comment noted. The NEPA/404 integration process has included discussion of impacts to seasonal and perennial drainage features that fall under the jurisdiction of the RWQCB.

Response to Comment 21-12

Comment noted. Through the NEPA/404 integration process the Department and STA have conducted an evaluation of avoidance and minimization measures for impacts to CWA and 404 waters. This evaluation resulted in the ability to reduce the permanent fill of CWA and 404 waters by 1.8 acres.

Response to Comment 21-13

The bioswales proposed by the Department to mitigate potential stormwater runoff impacts will be designed to meet Water Board criteria.

Response to Comment 21-14

Hydromodification requirements are dependent on characteristics of the receiving waters. Certain characteristics preclude the need for hydromodification facilities. For instance, hardened channels, tidally influenced waterways and streams that experience aggradation are not subject to hydromodification facilities. Adjacent to the project footprint, some of the streams are within the influence of the mean high tides. Other streams are actively aggrading (filling) due to the flattened gradients from the upper watershed reaches to the near tide reaches. The Department and STA are committing to characterizing the extent of the project's hydromodification impacts and would identify measures to reduce impacts prior to applying for a Section 401 Water Quality Certification.

Response to Comment 21-15

Comment noted. Waters of the state are non-jurisdictional features in the study area include seasonal drainages (irrigation and roadside ditches) and seasonal wetlands. Waters of the state in the study area are depicted in Figures 3.3-2a, 3.3-2b, 3.3-2c, and 3.3-2d in Volume 2 of the EIR/EIS and listed in Tables 3.3.2-1 through 3.3.2-4 in the Final EIR/EIS.

The word “potential” has been added to the discussion of waters of the State in the Final EIR/EIS in Section 3.3.

Response to Comment 21-16

The cumulative analysis discussion in Section 3.6 has been revised to clarify that federal policy (not the Clean Water Act) establishes the goal of no net loss of functions and values of wetlands. The revision also removes the statement that compliance with no net loss requirements would reduce cumulative impacts to less-than-significant, and states that cumulative impacts on wetlands are reduced over time through compliance with the no-net-loss goal.



COMMENT SHEET

Comment 22

Public Meeting
September 23, 2010
6:00 - 8:00 PM
Solano County Administration Building, Room 1600
675 Texas Street, Fairfield, CA

Name: MANDI SAHNI Affiliation: _____
Address: _____ Phone: _____
City/State/Zip: FAIRFIELD CA 94534 Email: _____

Comments may be submitted tonight or mailed/mailed to:
Caltrans, District 4
Attn: Howell Chan
Environmental Analysis Office Chief
P.O. Box 23660, MS-8B
Oakland, CA 94623-0660
E-mail: Howell_chan@dot.ca.gov

Please note: Comments must be received by
5:00 p.m. on Monday, October 11, 2010

I would like to submit the following comments on the Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the I-80 I-680 SR12 Interchange Project:

WE OWN CHEVRON, JIB ON SOISON VALLEY
EXIT AND THE VACANT LAND. BOTH
THE ALTERNATIVES EFFECT OUR
BUISNESS. I AM TRYING TO
MARKET THE VACANT LAND NEXT TO US (CHEVRON)
AND NOW I CANNOT SINCE WE DONT KNOW
WHICH PLAN ARE YOU GOING. I HAVE TO
SIT ON THIS LAND TILL YOU DECIDE. ~~AND~~

22-1

(Please use reverse side if additional space is needed.)

Thank you for participating in tonight's Public Hearing.

Public Meeting Comment 22, Manoj Sahni, Comment Sheet, 09/23/10

Response to Comment 22-1

The commenter expresses a general concern about the project alternatives and impacts on their property. During the final design and right-of-way negotiation process a more exhaustive assessment of specific impacts to each property will be undertaken. Property owners will be compensated in full accordance with Public Law 91-646, the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended.

Alternative C has been selected as the preferred alternative. An explanation of this process and the reasons for this decision are provided in Section 2.5 of the Final EIR/EIS.



COMMENT SHEET

Comment 23

Public Meeting
September 23, 2010
6:00 – 8:00 PM
Solano County Administration Building, Room 1600
675 Texas Street, Fairfield, CA

Name: WOODY DARNBUE Affiliation: SuperStore Inc. Sunny Side Farm
Address: _____ Phone: _____
City/State/Zip: Fairfield Ca. 94533 Email: _____

Comments may be submitted tonight or mailed/emailed to:

Caltrans, District 4
Attn: Howell Chan
Environmental Analysis Office Chief
P.O. Box 23660, MS-8B
Oakland, CA 94623-0660
E-mail: Howell_chan@dot.ca.gov

Please note: Comments must be received by
5:00 p.m. on Monday, October 11, 2010

I would like to submit the following comments on the Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the I-80 I-680 SR12 Interchange Project:

ALTERNATIVE C - IMPROVED INTERCHANGE AT I-80 AND REDTOP RD.
THE EAST SIDE OF ON RAMP/OFF RAMP, TO SR 12 FROM REDTOP RD.
IS TOO CLOSE TO EXISTING BUILDING AND TRAFFIC FLOW
AROUND TO THE BACK OF Sunny Side Recovery BAYS
S.S.I/SUNNYSIDE IS ASKING FOR DETAILED PLANS OF BOTH
B AND C AT REDTOP RD.
B IS PUTTING TOO MUCH IN ONE SMALL PLACE

23-1

(Please use reverse side if additional space is needed.)

Thank you for participating in tonight's Public Hearing.

Public Meeting Comment 23, Woody Darnelle, SuperStore Ind. Sunnyside Farms, Comment Sheet, 09/23/10

Response to Comment 23-1

The commenter expresses a concern about the project alternatives and impacts on their property. The Department has conducted an analysis of impacts to private property based on the engineering plans for each alternative and included that analysis and its findings in the EIR/EIS (see Section 3.1.4). During the final design and right-of-way negotiation process further design details will be developed. Property owners will be compensated in full accordance with Public Law 91-646, the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended.



COMMENT SHEET

Comment 24

Public Meeting
 September 23, 2010
 6:00 – 8:00 PM
 Solano County Administration Building, Room 1600
 675 Texas Street, Fairfield, CA

Name: LESLEY BRUNNER Affiliation: HORN GREEN VALLEY LAKE
 Address: _____ none: _____
 City/State/Zip: FAIRFIELD CA 94534 Email: _____

Comments may be submitted tonight or mailed/mailed to:

Caltrans, District 4
 Attn: Howell Chan
 Environmental Analysis Office Chief
 P.O. Box 23660, MS-8B
 Oakland, CA 94623-0660
 E-mail: Howell_chan@dot.ca.gov

Please note: Comments must be received by
 5:00 p.m. on Monday, October 11, 2010

I would like to submit the following comments on the Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the I-80 I-680 SR12 Interchange Project:

I ~~WANT~~ LIKE OPTION C. WE REALLY NEED
THE NEW WIDER OVERPASS AT GREEN VALLEY RD. 24-1
ALSO NEED AN OFF RAMP AT SAKSUN VALLEY RD.
FAIRFIELD HAS APPROVED A 400 HOME PROJECT
FURTHER ALONG GREEN VALLEY RD. THIS MEANS
THERE WILL BE AT LEAST 2000 RESIDENCES
USING THE GREEN VALLEY ON + OFF RAMP. 24-2
WE SHOULD ALSO ADDRESS PEDESTRIANS TRYING
TO CROSS GREEN VALLEY RD OR BUSINESS CENTER
(Please use reverse side if additional space is needed.) UNSAFE
AT THIS POINT IT IS DANGEROUS, WITH NEW
Thank you for participating in tonight's Public Hearing.
ON + OFF RAMPS, IT WILL BECOME DEADLY.

Public Meeting Comment 24, Lesley Brunner, HOA Green Valley Lake, Comment Sheet, 09/23/10

Response to Comment 24-1

Comment noted.

Response to Comment 24-2

The Draft EIR/EIS traffic forecasts include all residential and non-residential growth expected through 2035, and the recently-approved 400-unit project referred to is included within those projections. The intersection of Green Valley Road/Business Center Drive currently includes crosswalks on all four legs, pedestrian push-buttons, and minimum pedestrian crossing times. This intersection is projected to operate below the City of Fairfield's LOS standard of D under 2035 PM peak hour conditions, for the No Build and Phase 1 alternatives, but will operate acceptably under 2035 PM peak hour conditions for the Full Build Alternatives. The Draft EIR/EIS's avoidance, minimization and mitigation measures include the design and construction of intersection improvements "to minimize the impact of traffic pattern changes associated with the proposed project's ramp terminal and non-ramp terminal intersections." The improvements would be designed by the Department in cooperation with the City of Fairfield, in the case of the subject intersection, and would therefore conform to the City's requirements for adequate pedestrian accommodation and service.



COMMENT SHEET

Comment 25

Public Meeting
September 23, 2010
6:00 – 8:00 PM
Solano County Administration Building, Room 1600
675 Texas Street, Fairfield, CA

Name: Linda Mellor Affiliation: Homeowner
Address: _____ Phone: _____
City/State/Zip: Fairfield, CA 94534 Email: _____

Comments may be submitted tonight or mailed/emailed to:

Caltrans, District 4
Attn: Howell Chan
Environmental Analysis Office Chief
P.O. Box 23660, MS-8B
Oakland, CA 94623-0660
E-mail: Howell_chan@dot.ca.gov

Please note: Comments must be received by
5:00 p.m. on Monday, October 11, 2010

I would like to submit the following comments on the Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the I-80 I-680 SR12 Interchange Project:

Alternative C seems like a much more viable solution for many reasons:

1) Addresses having an onramp for Westbound traffic @ Suisun Valley Rd

2) Moves the interchange away from the congestion of the truck stop

3) Creates a combined interchange for I80 I680 $\frac{1}{2}$ I7 toward Napa

4) From my understanding C creates a new interchange for high school traffic

5) Moves a noisy interchange away from homes
(Please use reverse side if additional space is needed.)

6) Spaces out ^{Thank you for participating in tonight's Public Hearing.} the mess of traffic occurring - truck stop; 80.

25-1

Public Meeting Comment 25, Linda Mellor, Comment Sheet, 09/23/10

Response to Comment 25-1

Comment noted.

Comments 26, 27, 28

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CALIFORNIA DEPARTMENT OF TRANSPORTATION
PUBLIC MEETING
I-80/I-680/SR 12 INTERCHANGE PROJECT
DRAFT ENVIRONMENTAL IMPACT
REPORT/ENVIRONMENTAL IMPACT STATEMENT

Thursday, September 23, 2010

6:00 o'clock p.m.

Solano County Administration Building

675 Texas Street

Room 1610

Fairfield, California

REPORTED BY: MARY DUTRA, CSR #9251

1 Caltrans and the STA have completed the
2 environmental analysis for the I-80/I-680/SR 12
3 Interchange Project. Required by the National
4 Environmental Policy Act (NEPA) and the California
5 Environmental Quality Act (CEQA) the Draft EIR/EIS
6 studies the effects that the proposed project may have
7 on the environment. The public is encouraged to
8 provide comment.

9 Verbal or written comments may be submitted
10 at the public meeting on September 23, 6:00 to 8:00
11 p.m. at the Solano County Administration Building, 1st
12 Floor, 675 Texas Street, Fairfield, California.

13 ---o0o---

14 PUBLIC COMMENTS

15 MR. PERMANN: Walter Permann, P-e-r-m-a-n-n.
16 Address, 2110 Pebble Drive, Alamo, California.

17 We own the property at 4885 Fulton,
18 F-u-l-t-o-n, Drive, Fairfield, California.

19 I'm concerned about the traffic flow on
20 Lopes Road at the intersection of Fulton Drive. The
21 U-turn proposed, I feel, is not satisfactory for the
22 existing traffic conditions.

23 I am a licensed state engineer and would
24 like to discuss the situation. You can contact me at
25 area code (925) 687-3500 in my office at Concord,

26-1

1 California. Thank you very much.

2 ---o0o---

3 MS. VALINE: My name is Michelle Valine,
4 V-a-l-i-n-e. I'm owner of the Valine Ranch. I
5 believe I'm the only person or property owner that is
6 affected by three, possibly four, of these projects.
7 I'm a third-generation Suisun Valley farmer,
8 fourth-generation Californian. There's a lot of
9 history in Suisun Valley that has my family name
10 associated with it, and I'm not just referring to the
11 first time that they took an easement through my
12 grandfather's property for Highway 40.

13 The topic is not history, it's progress.
14 And I'm not, as a property owner, trying to stand in
15 the way of progress; I'm seeking to be treated fairly
16 and with respect. And in the words of my dear friend
17 Bernie Moore (phonetic), fair may be subjective,
18 respect is not. I have yet to be treated with either.

19 At the inception of the Highway 12 connector
20 project a representative of Solano Transportation
21 Authority sat in my home and ensured me repeatedly
22 that the project would have no impact on my quality of
23 life, my safety, or my personal well-being. Nothing
24 could be further removed from the truth, nothing could
25 be more different than the traumatized life I have had

27-1

1 to live the last year and a half.

2 I can provide a complete and detailed list
3 of all the offenses, but I have had -- since the start
4 of the project, I have had hay stolen from the
5 haystack, wood stolen from the wood pile, I've had
6 buildings graffiti'd, I've had fences graffiti'd, I've
7 had an endless parade of trespassers, people walking
8 their dogs, people riding their bikes, riding
9 motorcycles, dirt bikes, riding their horses who are
10 just curious as to where the road went. And they all
11 end up on my property, and when I ask them to leave, I
12 all too often am verbally accosted for the request.

13 I have had countless engineers, contractors,
14 subcontractors on my property where they shouldn't be.
15 And again, I'm treated with disrespect when I ask them
16 to leave.

17 My well -- the contractor pumped groundwater
18 to keep their construction site clean or clear of
19 water. They never bothered to check our wells on the
20 property. My well was contaminated. I now have
21 orange toilets, sinks, showers, dishwashers, a washing
22 machine and a couple loads of orange laundry.

23 The dust has been horrific. I have had
24 personal health issues as a result. Most people go
25 home to find refuge; I have to drive through hell to

27-1
cont.

27-2

27-3

1 get there and then live in the middle of it.

27-3
cont.

2 What I'm asking is that STA, the board of
3 supervisors find a way to buy all the property that's
4 being affected by these projects at one time so that I
5 can move forward with my life. To live as I have
6 lived under the conditions I have lived in the last
7 year is unreasonable to expect of anyone.

8 My whole life I've had my horses there and
9 my emotional outlet there, a source of income. I have
10 not had them for a year. It is not any way to live.
11 I deal with the -- in my job with the expenditure of
12 federal and state funds and I know that for every rule
13 there's an exception or there's a clause that allows
14 for exceptions to be made. I'm asking them to find
15 the exception and buy the three pieces of property,
16 not to amputate my ranch, my family history, and my
17 financial well being a piece at a time and leave me to
18 bleed to death emotionally and financially.

27-4

19 ---o0o---

20 MS. SAHNI: Pam Sahni, and we own the Super
21 Serve Chevron. We have a Jack in the Box retail
22 center with that and an empty parcel right next to our
23 station. So we were looking at the alternatives, and
24 both of them would affect us. One would be
25 devastating; it would completely wipe us out. It

28-1

1 would basically go right through our station, our
2 empty land, to widen the expansion. The other
3 alternative, which is a little bit more palatable, but
4 at this point it looks like they would take some of
5 our land in conjunction of doing it. These are both
6 in the phase ones. We definitely -- I just want to
7 make sure that I'm saying we prefer the right one.

8 We prefer -- we prefer alternative C to
9 alternative B. We prefer C to B. B would take over
10 and basically we wouldn't have a business any longer.
11 We spent a lot of money building and developing the
12 site.

13 We have been in the Fairfield area since the
14 '90s. We rebuilt our Chevron site in 2003. We put
15 about \$5 million into the site. So for us it would be
16 like a major, mind-blowing kind of a devastating
17 impact if they were to take over.

18 It's a good business, it's a running
19 business, it pays its tax and supports the community.
20 So we definitely want you guys to consider the other
21 alternative that wouldn't be so devastating to us,
22 basically. That's what I want to say.

23 ---o0o---

24 (Whereupon, the proceedings adjourned at
25 8:00 o'clock p.m.)

Public Meeting Comment 26, Walter Permann, Oral Comment, 09/23/10

Response to Comment 26-1

The comment refers to the access to the properties near the current intersection of Lopes Road and Fulton Road. Under Alternative C and its fundable first phase, the access to this area from Fermi Drive to the south will be eliminated due to the construction of the new I-680 –to – I-80 connector and the connection of the current northern portion of I-680 to Red Top Road, as a local (non-freeway) roadway. However, access to Fulton Drive will still be available via Lopes Road from the north, and via Watt Drive from the south. A second access route from the south is, as the commenter notes, to take the new local roadway to be provided on the current I-680 alignment, and turn left at the intersection with Auto Plaza Court and left again onto Lopes southbound. However, this route may not be as convenient as taking Fermi to Watt northbound, and taking a right on Fulton.

Public Meeting Comment 27, Michelle Valine, Oral Comment, 09/23/10

Response to Comment 27-1

The commenter discusses issues and effects they have experienced over many years during the planning and construction of various roadway projects in the area and across her property. Many of the issues and effects the commenter describes have been related to the construction of the Suisun Parkway project (previously referred to as the North Connector) which was constructed across a portion of the commenter's property. However the commenter notes issues and effects associated with engineers, contractors, and subcontractors that have visited the commenter's property during the planning of the project. STA apologizes for any inconvenience these activities have caused the commenter. STA's intent is to reduce the effects of its projects on project area residents and property owners to the extent feasible. STA's engineers and contractors are instructed to perform their work in accordance with property owner approval, within designated areas and to always treat property owners with respect. Moving forward, the development of a site control plan would be enforced by the Resident Engineer during construction to avoid any inconveniences to the project area residents and property owners.

Response to Comment 27-2

Although the I-80/I-680/SR 12 Interchange Improvement project has not yet been initiated, once it has been, construction site BMPs would be implemented before and during construction activities to reduce the pollutants in the stormwater discharges throughout construction. These include hydraulic mulch, hydroseeding, soil binders, silt fence, sediment traps, sand bags, fiber rolls, and straw bale barriers. The development of a site control plan would be enforced by the Resident Engineer during construction to avoid any inconveniences to the project area residents and property owners. Contractors will further be prohibited from using and polluting water wells.

Response to Comment 27-3

Although the I-80/I-680/SR 12 Interchange Improvement project has not yet been initiated, once it does, construction site BMPs to control dust would be applied during construction activities. These may include application of water or dust palliative, application of a soil binder on unpaved roads, implementation of speed limits, sprinkling, temporary paving, and expedited revegetation of disturbed slopes. The development of a site control plan would be enforced by the Resident Engineer during construction to avoid any inconveniences to the project area residents and property owners. The Department will diligently control construction dust to the extent feasible.

Response to Comment 27-4

The acquisition of property needed to construct and operate the project would be done in strict compliance with Public Law 91-646, the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended. The commenter's property is located along I-80 east of Suisun Creek. While Alternative B and Alternative C affect the commenter's property in the same manner, Alternative B, Phase 1 and Alternative C, Phase 1 do not include improvements in this area and would not require acquisition of the commenter's property. The commenter's property may be affected with construction of the relocated I-80 Westbound (WB) Truck Scales, which is part of both ultimate project alternatives (Alternative B and Alternative C). The timing of improvements beyond Phase 1 has not been determined. Acquisition of the

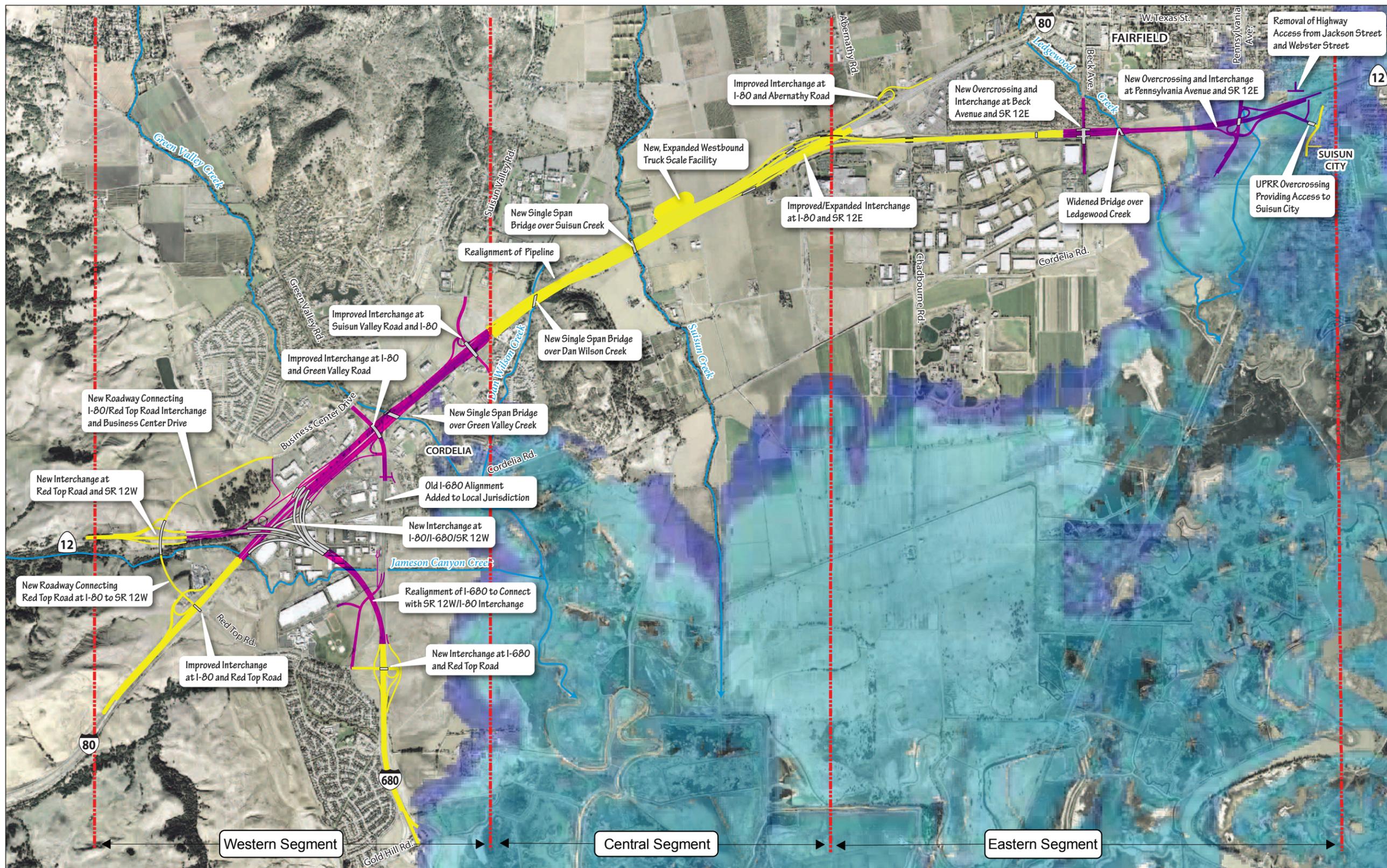
commenter's property, if necessary, would follow the appropriate procedures under the Uniform Relocation Assistance and Real Property Acquisition Policies Act and all other applicable laws.

Public Meeting Comment 28, Pam Sahni, Oral Comment, 09/23/10

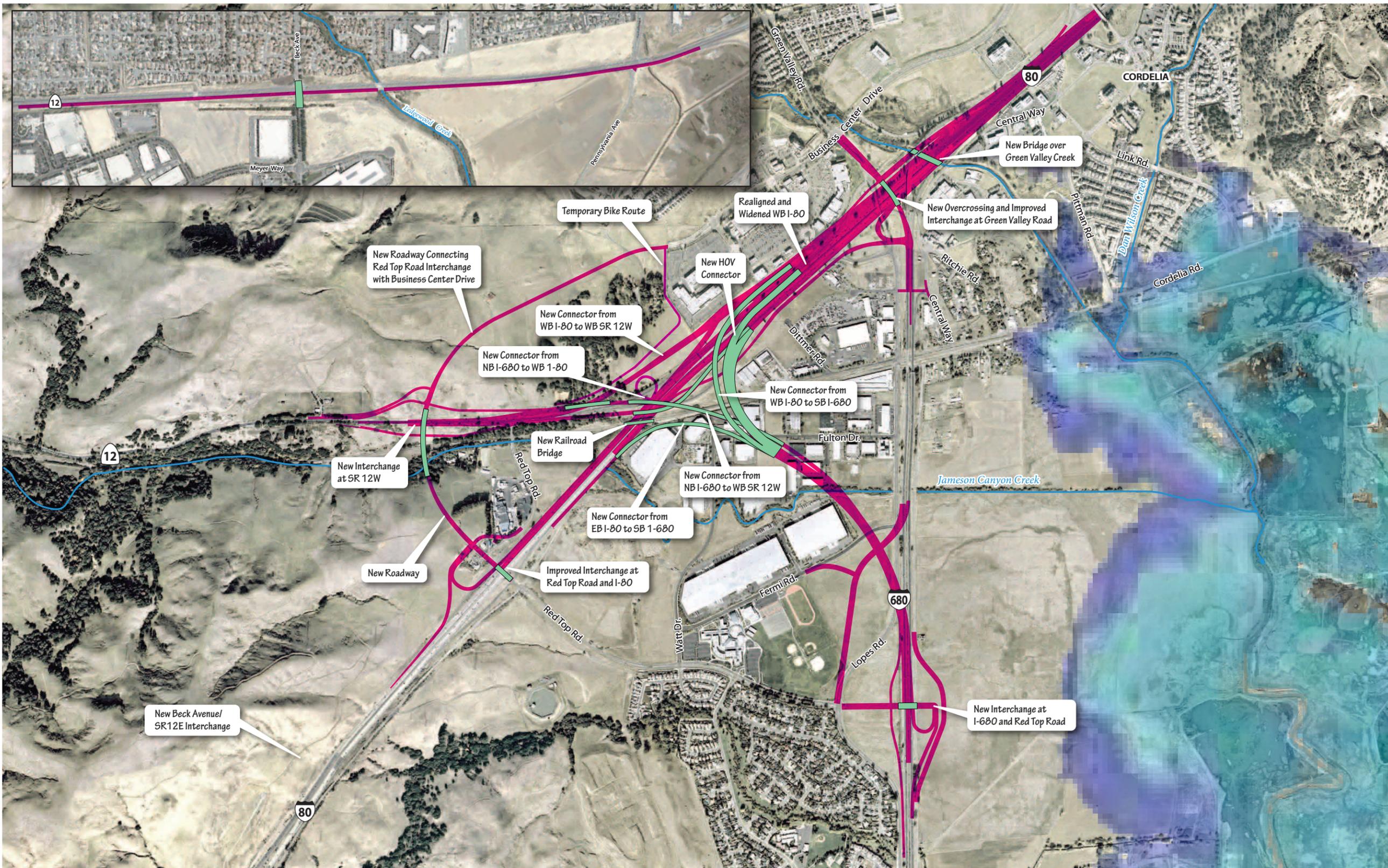
Response to Comment 28-1

The commenter notes a preference for Alternative C which the Department has identified as the Preferred Alternative.

Acquisition of the commenter's property, or any part thereof, if necessary, would follow the appropriate procedures under the Uniform Relocation Assistance and Real Property Acquisition Policies Act and all other applicable laws.



Projected Sea Level Rise Relative to Alternative C



Legend

- Proposed New or Expanded/Improved Roads
- Proposed New or Expanded/Improved Bridge/Overcrossing
- Creek
- 16 inch Sea Level Rise (~mid-century estimate)
- 55 inch Sea Level Rise (~end-of-century estimate)

Disclaimer: Inundation data used in these maps do not account for existing shoreline protection or wave activity. These maps are for informational purposes only. Users agree to hold harmless and blameless the State of California and its representatives and its agents for any liability associated with the use of the maps. The maps and data shall not be used to assess actual coastal hazards, insurance requirements, or property values or be used in lieu of Flood Insurance Rate Maps issued by the Federal Emergency Management Agency (FEMA).



List of Technical Studies

List of Technical Studies

The following technical studies have been prepared and are available for review at the Department's District 04 office at 111 Grand Avenue in Oakland, California.

- *I-80/I-680/SR 12 Interchange Project Community Impact Assessment.* (Circlepoint 2009)
- *Final Traffic Operations Report for the I-80/I-680/SR 12 Interchange Project Report.* (Fehr & Peers 2010)
- *I-80/I-680/SR 12 Interchange PR/ED: Existing Conditions VISSIM Model Calibration/Validation Technical Memorandum* (Fehr & Peers October 8, 2003).
- *I-80/I-680/SR 12 Interchange PR/ED: Existing Conditions VISSIM Model Calibration/Validation for the Project Expansion Area Technical Memorandum* (Fehr & Peers February 14, 2005).
- *I-80/I-680/SR 12 Interchange PR/ED: Existing Weekday (Tuesday through Thursday) Traffic Operating Conditions for the Expanded Project Area-Technical Memorandum* (Fehr & Peers February 2005).
- *I-80/I-680/SR 12 Interchange PR/ED: Design Year 2035 Demand Forecasts at Project Gateways Technical Memorandum* (Fehr & Peers July 14, 2006).
- *I-80/I-680/SR 12 Interchange PR/ED: Updated Validation of the VISSIM Traffic Operations Model to 2007-2008 Conditions Technical Memorandum* (Fehr & Peers October 30, 2008).
- *I-80/I-680/SR 12 Interchange Project: Addendum to Traffic Operations Report for Alternative C, Phase 1, Revised for Additional Freeway-to-Freeway Connector Ramps* (Fehr & Peers November 23, 2010).
- *I-80/I-680/SR 12 Interchange Project Visual Impact Assessment.* (Circlepoint 2012)
- *Historic Property Survey Report, I-80/I-680/SR 12 Interchange Project, California Department of Transportation, District 4, Solano County, California.* (ICF Jones & Stokes 2009)
- *Historic Resources Evaluation Report, I-80/I-680/SR 12 Interchange Project, California Department of Transportation, District 4, Solano County, California.* (ICF Jones & Stokes 2009)
- *Archaeological Survey Report, I-80/I-680/SR 12 Interchange Project, California Department of Transportation, District 4, Solano County, California.* (ICF Jones & Stokes 2009)
- *Archaeological Extended Phase I and Geoarchaeological Assessment, I-80/I-680/SR 12 Interchange Project, California Department of Transportation, District 4, Solano County, California.* (ICF Jones & Stokes 2009)
- *I-80/I-680/SR-12 Interchange Project, Location Hydraulic Study & Summary Floodplain Encroachment Report.* (Mark Thomas & Co. and Nolte Associates 2009)

- *I-80/I-680/SR-12 Interchange Project, Stormwater Data Report.* (Mark Thomas & Co. and Nolte Associates 2009)
- *Environmental Geotechnical Memorandum, I-80/I-680/SR 12 Interchange Project, Solano County, California, 04-Sol-12, 680, 80 PM Var.* (Parikh Consultants, Inc. 2009)
- *Addendums to the Environmental Geotechnical Memorandum, I-80/I-680/SR 12 Interchange Project, Solano County, California, 04-Sol-12, 680, 80 PM Var.* (Parikh Consultants, Inc.)
- *I-80/I-680/SR 12 Interchange Project, Paleontological Sensitivity Analysis.* (ICF Jones & Stokes 2009)
- *Initial Site Assessment, I-80, I-680, SR-12 Improvement Project, Solano County* (Geocon Consultants 2008)
- *I-80/I-680/SR 12 Improvement Project, Fairfield and Suisun City, Solano County, California, Initial Site Assessment Update.* (Geocon Consultants 2009)
- *Interstate 80/Interstate 680/State Route 12 Interchange Project Air Quality Technical Report.* (ICF Jones & Stokes 2009)
- *Noise Study Technical Report for the Interstate 80/Interstate 680/State Route 12 Interchange Project.* (ICF International 2010)
- *Interstate 80/Interstate 680/State Route 12 Interchange Natural Environmental Study.* (ICF International 2010)
- *Delineation of Waters of the United States for the Interstate 80/Interstate 680/State Route 12 Interchange Project, Solano County, California.* (ICF Jones & Stokes 2009)
- *Site Assessment for California Red-legged Frog for the Interstate 80/Interstate 680/State Route 12 Interchange Project,* submitted to the U.S. Fish and Wildlife Service (USFWS) on March 3, 2009, for review (ICF International 2009).
- *Fish Passage Assessment for Green Valley, Ledge wood, and Suisun Creeks, Solano County, California.* (ICF International 2010)
- *Interstate 80/Interstate 680/State Route 12 Interchange Project Energy Technical Report* (ICF International 2010)
- *Assessment of Fault Rupture and Analysis of Displacement Hazard, Solano Transportation Authority Interchange Project, Cordelia, California (I80/I680/SR12 Interchange)* (William Lettis & Associates 2009)
- *Interstate 80/Interstate 680/State Route 12 Interchange Project Biological Assessment* (ICF International 2010).
- *Biological Opinion on the Effects of the Proposed Interstate 80/Interstate 680/State Route 12 Interchange Phase 1 Project, Solano County, California* (EA 0A5300) (April 2012)
- *Interstate 80 High-Occupancy Vehicle Lane Project Initial Study/Proposed Mitigated Negative Declaration* (2007).