



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street  
San Francisco, CA 94105-3901

October 28, 1998

John P. Rieger, Chief  
Environmental Stewardship Branch  
California Department of Transportation  
District 11  
P.O. Box 85406  
San Diego, CA 92186-5406

Dear Mr. Rieger:

The Environmental Protection Agency has reviewed the information accompanying your August 24, letter, provided pursuant to the NEPA/404 Memorandum of Understanding (MOU), concerning the proposed Route 78/111 Brawley Bypass project. The California Department of Transportation is proposing to construct a four-lane divided expressway from northwest of Brawley at State Route 86 to southeast of Brawley at SR 111. Caltrans originally prepared an Alternative Report (May 1997) presenting the general project purpose and need as well as briefly describing a series of alternatives screened from further analysis, and three alternatives to be evaluated fully in the project EIS. We reviewed this document relative to the requirements of the NEP-404 MOU and the Clean Water Act Section 404(b)(1) Guidelines. We would like to thank you for the additional documentation that we asked for in our June 12th letter regarding clarifications and supporting information on the Purpose and Need statement. This information is helpful in understanding the problems a project hopes to remedy, and the rationale for proposing a bypass. We also, appreciate the additional information that was provided regarding the wetlands and waters impacts, and the indication of consideration for non-bypass alternatives.

Therefore, we are pleased to offer our concurrence on the criteria for alternative selection and the alternatives presented for further review. However, we do have some suggestions for your consideration during the development of the environmental document. First, we suggest that Caltrans identify the project's impact on the accident rates without and with the project in the Draft environmental document, so a quantifiable analysis can be presented regarding an important aspect of the need for the project. Also, we recommend that the information from the May 1997 alternatives report regarding the southerly alternatives and this most current information be brought together in one complete alternatives analysis discussion. Lastly, we recommend that you continue to refer to our comments on cumulative and secondary impacts that were in our June 12, letter. We believe that these issues are significant enough to warrant a careful and complete analysis of their impacts. If you have questions or need assistance, please contact us.

We feel that this has been a successful outcome of the process and appreciate the efforts of your staff to work with us. We look forward to working with them on the next steps of the NEPA-404 coordination MOU process. If you have any questions regarding our comments, please contact me at (415) 744-1577. If you have any questions regarding Section 404 issues, you may contact Steven John of our Wetlands and Sediment Management Section at (213) 452-3806.

Sincerely,

David J. Carlson  
Life Scientist  
Federal Activities Office