

Appendix I: Comments Received on DEIR/EA

The following list of individuals, agencies, and organizations provided comments on the I-80 Bus/Carpool Lane Project in written form via the provided comment cards from the May 9 and 15, 2007 public workshops, or by letters and emails sent directly to Caltrans during the 45-day public circulation period required for the DEIR. Overall, Caltrans received 9 comment cards from the workshops, 3 emails, and 5 letters.

Public Workshop Comments:

- Daniel Antone
- Kowalo Bates
- David Beam
- Roberta Fenrich
- Stephen Johnson
- Jacek Kalisz
- Kris Leino
- Dan Phillips
- Robert West

Email Comments:

- Daniel Airola
- Vladimir German
- Angie Shook

Letter Comments:

- California Department of Fish and Game
- City of Sacramento
- Environmental Council of Sacramento
- Sacramento Area Bicycle Advocates
- Sacramento Metropolitan Air Quality Management District

**I-80 Bus/Carpool Project "Across the Top"
PUBLIC OPEN HOUSE • May 9, 2007**

Comments

This is a needed project! My only concern is the noise level at my house. At this time when the wind is calm or blows from the north, the noise is so bad I can't open my windows when I sleep. I can hear it anyway even though I installed double pane windows several years ago. The noise is definitely getting worse and will be worse as time goes by. Thanks for your consideration!

W1

David Beam

For more comments use reverse side.
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Name <small>(please print)</small>					
<small>First</small>	<small>Last</small>	<small>Street Address</small>	<small>City</small>	<small>State</small>	<small>Zip</small>
David	Beam	2225 Conifer Way	Sacto	CA	95838
Address					
Authorized Representative <small>(Name of Organization or Agency)</small> Address <small>(business)</small>					

**I-80 Bus/Carpool Project "Across the Top"
PUBLIC OPEN HOUSE • May 9, 2007**

Comments: SOUTH SOUND WALL AT WINTERS STREET AREA

AS A RESIDENT OF EAST DEL PASO HEIGHTS, I WOULD LIKE TO ASK CALTRANS TO ELIMINATE THE HARDSHIP OF THE NOISE COMING FROM THE ELEVATED STRETCH OF I-80 IN THE WINTERS STREET AREA. THE EAST DEL PASO HEIGHTS RESIDENTIAL AREA IS IMMEDIATELY SOUTH OF THE PROJECT IN THE VICINITY OF WINTERS STREET. THIS AREA IS GREATLY AFFECTED BY THE FREEWAY TRAFFIC NOISE COMING TO THE RESIDENTS FROM THE NORTHEAST DIRECTION. THE NOISE IS ESPECIALLY ANNOYING TOWARDS EVENING, DURING COLD DAYS AND AT WINDY TIMES. THE NOISE IS COMING NOT ONLY FROM VEHICLE TIRES, BUT ALSO FROM THE EXHAUST HIGH STACKS OF DIESEL TRUCKS. THE AREA IS DENSELY POPULATED AND MANY RESIDENTS ARE CONCERNED WITH THE FREEWAY NOISE.

THE OPEN HOUSE EXHIBIT DISPLAY SHOWS THE SOUND WALL PROPOSED ALONG THE RIGHT OF WAY LINE ON THE EASTBOUND (SOUTH) SIDE OF THE FREEWAY OVER THE CUT SECTION, FURTHER ALONG THROUGH THE WINTERS STREET EXIT, AND UP TO GRAND AVE, WHERE IT STOPS, BUT I-80 FROM WINTERS EXIT RAMP GOES TO THE DEL PASO PARK SEPARATION OVERHEAD IS ELEVATED ABOVE GROUND AND IS A MAJOR SOURCE OF THE NOISE COMING TO OUR RESIDENTIAL AREA.

I WOULD LIKE TO ASK YOU TO INCLUDE IN THE PROJECT PLANS NECESSARY NOISE SUPPRESSION MEASURES FOR THE NOISE GENERATED BY THE ELEVATED FREEWAY STRETCH. CONSTRUCTING THE SOUND WALL ALONG EASTBOUND I-80 FROM THE WINTERS STREET EXIT RAMP GORE UP TO THE DEL PASO PARK SEPARATION OVERHEAD CURVE WILL ELIMINATE THE NOISE AFFECTING THE RESIDENTS OF EAST DEL PASO HEIGHTS AREA. THE RESIDENTS OF EAST DEL PASO HEIGHTS HAVE BEEN WAITING FOR THE NOISE SUPPRESSION PROVIDED BY THESE SOUND WALLS SINCE I-80 WAS BUILT IN THE SIXTIES. THE SOUND WALLS HAD BEEN PROMISED, BUT WERE NEVER BUILT.

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Name (please print)				
JACEK	KALISZ	2224 CONIFER WAY	SACRAMENTO, CA	95838
<small>First</small>	<small>Last</small>	<small>Street Address</small>	<small>City</small>	<small>State</small> <small>Zip</small>
Address				
Authorized Representative (Name of Organization or Agency) Address (business)				

W2

**I-80 Bus/Carpool Project "Across the Top"
PUBLIC OPEN HOUSE • May 9, 2007**

Comments

A positive proposal for sound barrier
in this neighborhood. Too much freeway
and traffic noise at the moment.

W3

For more comments use reverse side.

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Name <small>(please print)</small>					
<i>Kris</i>	<i>Leino</i>	<i>2225 South Ave</i>	<i>Sal Ca</i>	<i>95838</i>	
<small>First</small>	<small>Last</small>	<small>Street Address</small>	<small>City</small>	<small>State</small>	<small>Zip</small>
Address					
Authorized Representative <small>(Name of Organization or Agency)</small> Address <small>(business)</small>					

**I-80 Bus/Carpool Project "Across the Top"
PUBLIC OPEN HOUSE • May 9, 2007**

Comments

I have been a home-owner on South Ave for thirty years. The noise from traffic on 80 has been unbearable at times. On days or nights when traffic is light you still hear horns (usually from big trucks) as well as automobile accidents. I believe a sound wall would be extremely helpful for home owners such as myself. I have two small children in the house that take several naps a day. Sometimes it can be very tiring to find the quietest room in the house.

W4

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Name <small>(please print)</small>					
DOBSON	WEST	2770 South Hill	Santa	CA	95838
<small>First</small>	<small>Last</small>	<small>Street Address</small>	<small>City</small>	<small>State</small>	<small>Zip</small>
Address					
Authorized Representative <small>(Name of Organization or Agency)</small> Address <small>(business)</small>					

**I-80 Bus/Carpool Project "Across the Top"
PUBLIC OPEN HOUSE • May 9, 2007**

Comments

I understand there's a possibility we may be getting sound walls along I80E. This is a good thing & would help reduce freeway sounds. We would also suggest the same thing - ~~or~~ anything - to cut down the constant noise coming from the Marconi curve on B 80W.

Sound walls would be helpful !!

W5

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Name (please print) ROBERTA FENRICH					
First	Last	Street Address	City	State	Zip
		3608 ASTORIA ST	SAC	CA	95832
Authorized Representative (Name of Organization or Agency) Address (business)					

**I-80 Bus/Carpool Project "Across the Top"
PUBLIC OPEN HOUSE • May 9, 2007**

Comments I WOULD LIKE TO SEE AS MUCH EFFORT TO REDUCE NOISE FROM BOTH FREEWAY + TRAINS, TO STOP WALL AT WINTERS DOESN'T STOP ALL NOISE. TO RUN PAST FARTHER EAST, I THINK WOULD BE A MUCH BETTER.

W6

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Name (please print)
 RONALD BATES 2325 ROANOKE AVE SACTO CA 95838
First Last Street Address City State Zip

Address

Authorized Representative (Name of Organization or Agency) **Address** (business)

**I-80 Bus/Carpool Project "Across the Top"
PUBLIC OPEN HOUSE • May 9, 2007**

Comments

I believe it would be best in my
 concern to build a wall (noise barrier)
 on I80. It is very noisy and the
 smog pollution is affecting my breathing.
 I have spoken to many neighbors and
 all of them have agreed to build this
 wall.

W7

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 for statistical purposes, to notify you of any future hearings, or to assist in providing you with further information.
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Name (please print) Daniel Antone 2316 Roanoke Ave Sacramento CA 95834

First Last Street Address City State Zip

Address

Authorized Representative (Name of Organization or Agency) **Address** (business)

**I-80 Bus/Carpool Project "Across the Top"
PUBLIC OPEN HOUSE • May 9, 2007**

Comments I WANT TO SEE THE SOUND WALL BUILT
 THE WHOLE DISTANCE. THE NOISE FROM THE
 FREEWAY CAN REALLY BE LOUD AND ANNOYING
 AT TIMES AT OUR HOUSE.

W8

For more comments use reverse side.
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Name <small>(please print)</small>				
STEPHEN	JOHNSON	2215 SOUTH AVE.	SACRAMENTO	CA 95838
<small>First</small>	<small>Last</small>	<small>Street Address</small>	<small>City</small>	<small>State</small> <small>Zip</small>
Address				
Authorized Representative <small>(Name of Organization or Agency)</small> Address <small>(business)</small>				

**I-80 Bus/Carpool Project "Across the Top"
PUBLIC OPEN HOUSE • May 15, 2007**

Comments

I THINK HOV CARPOOL LANES
ARE A TOTAL WASTE OF
TAXPAYER DOLLARS, THERE ARE NOT
ENOUGH PEOPLE USING THEM TO
JUSTIFY IT. MEANWHILE WE HAVE
CARS IN OTHER LANES MOSTLY IDLING
IN TRAFFIC JAMS, WHICH CAUSES
MORE POLLUTION.

I THINK WHETHER WE HAVE
MORE CARPOOL LANES SHOULD BE PUT
TO A VOTE OF THE PEOPLE OF CALIF.
INSTEAD OF A BUNCH OF ELITISTS INSIDE
CALTRANS DECIDING. I GUARANTEE, THE
CITIZENS OF CALIF. WOULD VOTE DOWN
CARPOOL LANES.

For more comments use reverse side.

Completing and signing this document is voluntary. The Department of Transportation may use this information for statistical purposes, to notify you of any future hearings, or to assist in providing you with further information. This document is a public record and may be subject to inspection and copying by other members of the public.

Name (please print)					
First	Last	Street Address	City	State	Zip
	DAN PHILLIPS	4755			
Address					
5973 LAGUNA PARK DR., ELK GROVE, CA 95758					
Authorized Representative (Name of Organization or Agency) Address (business)					

W9

Ken,

Thank you for routing the DEIR to us for review. The Sacramento Fire Department has no project specific comments at this time. However, I'd like to take this opportunity to request that we are notified of all lane and ramp closures in advance so that we may determine temporary emergency routes. Please contact our PIO, Cpt. Jim Doucette, at 808-1616 with this information prior to construction.

E1

Thanks,

Angie Shook
Sacramento Fire Department
Prevention/Land Use
Dept Code 2528
phone (916) 808-1358 fx (916) 808-1677
ashook@sfd.cityofsacramento.org

Vladimir German
vova16@sbcglobal.net

04/21/2007 10:53 PM

My name is Vladimir German. I'm 35 years old. I'm worried also about the road condition at Sacramento area. I want to thank you for improving the part of the freeway. This is a very good decision, but, first-able I think, the speed limit needs to be increased by 75 mph. If you see outside, you may notice that about 80 % of cars that people have are new (up to 10 years old), and they can go 80 mph easily. And the freeway is good enough for it. The 65 mph limit does not solve the traffic problem any more. Carpool lane by itself will solve the problem only if you are going to build additional (fourth) lanes. Thank you.

E2

Name: Daniel Airola

Email : d.airola@sbcglobal.net

Address : 2700 6th Ave, Sacramento, CA 95818

comments: I previously submitted a message but due to my error, part of an earlier message was not transmitted. I am amending the message I just submitted, to provide more complete information. You may delete my immediately-previous message.

I am commenting on several aspects of the biological analysis for the project. My comments are based on a substantial amount of field work and analysis conducted in this area as a part of my 6+ year study of Purple Martins in Sacramento.

1) There is a likely burrowing owl nest in the levee immediately adjacent to I-80 at the Natomas Main Drain crossing. It is immediately adjacent to the Caltrans equipment yard. I saw the owls in a burrow during the nesting season in 2006 and 2007, but did not confirm nesting. The burrow is at the top and on the west face of the west levee. The birds perch on the perimeter fence at the Caltrans property. This pair easily could be disturbed by construction equipment and activity unless careful protection measures are employed.

E3a

2) I have seen Swainson's hawks regularly in the vicinity of the I-80 crossing. I would expect them to nest either on the adjacent golf course or in "residential" oak trees within or adjacent to near the proposed Winters Ave exit improvements. Nesting is presumed in this area, since foraging habitat is limited here. This area should be surveyed during the nesting season.

E3b

2) I believe the treatment of the Purple Martins nesting in the overcrossing of the Roseville Road is inadequate. The purple martin is designated as a Category 2 Species of Special Concern by California DFG. The species has been eliminated in the Central Valley, except for the 10 colonies occupied annually in the Sacramento region (as the EIR notes).

E3c

The I-80 crossing of Roseville Road supports 5-7% of the annual nesting population of the remnant Sacramento population. Exclusion as a mitigation measure has previously been shown to result in longer-term population reductions at affected sites (i.e., construction of the south light rail line beneath the Capital City Freeway at 20th St (see Airola and Grantham, 2003, *Western Birds* 34:235-251; Airola and Kopp, 2004, *Central Valley Bird Club Bulletin* 7:71-77). Given the potential for long-term effects on a special-status species, displacement should be considered a potentially significant impact.

The EIR should evaluate whether the project construction will even disturb purple martins, since they are relatively tolerant of human activity. If so, then EIR should evaluate the feasibility of constructing at this site during the nonbreeding season.

If construction is determined to be detrimental to Purple Martins, and if construction cannot be avoided, the following readily applicable mitigation will help prevent the potential significant effects of displacement of the martin population from this site:

- remove trees (especially non-native trees) that are encroaching on the air space beneath the adjacent overpass (immediately to the south) used to access the RT parking lot. This area is owned by Caltrans, and is the closest nesting areas to the project site. It is the likely site where displaced martins will attempt to nest. Growth of trees under the overpass is obstructing air space used by martins and reducing the suitability and population of this site. The growth of trees also has encouraged a very large nesting population of European Starlings, which are highly aggressive nest competitors with Purple martins.

E3d

- because valley oak trees likely cannot be removed beneath the overpass and thus substantial starling activity will persist, during the years of construction, Caltrans should trap and remove starlings during the early nesting seasons (Feb-April) to reduce nest site competition, and provide space for martins displaced from I-80 to nest. I can provide information on methods.

E3e

- any obstructions placed in nest holes should be removed as soon as construction activity subsides to a level that is considered compatible with martin nesting.

E3f

It is important to note that the potential loss of a colony, by excluding martins (especially critical if construction goes beyond one year), is a much more significant effect than causing some disruption of nesting for some pairs. Thus, holes in the structure away from the primary construction disturbance should be left open for the birds to choose. If they fail to nest successfully, that is not as important as retaining their long-term tie to the colony.

Finally, the design of new bridgework should be planned to allow access by cavity nesting birds. My understanding is that Caltrans is now purposely designing bridges to exclude birds.

E3g

Coexistence of birds and transportation structures is possible with careful planning and implementation. I have experienced a productive relationship with Caltrans in protecting a number of other martin sites in the Sacramento area. I realize that Caltrans is put in a difficult position by current interpretations of the Migratory Bird Treaty Act. If there is anything that I can do to assist Caltrans in working with the USFWS and DFG to fashion a biologically-based mitigation program that does not unnecessarily disrupt an important martin nesting colony, I would be happy to help.

Thank you for the opportunity to comment

Daniel Airola
Certified Wildlife Biologist



DEPARTMENT OF FISH AND GAME

<http://www.dfg.ca.gov>

North Central Region

1701 Nimbus Road, Suite A
Rancho Cordova, CA 95670
(916) 358-2900



June 6, 2007

Mr. Jeremy Ketchum
Department of Transportation
Environmental Planning
2389 Gateway Oaks Drive, Suite 100
Sacramento, CA 95833

Dear Mr. Ketchum:

The Department of Fish and Game (DFG) has reviewed the draft Environmental Impact Report / Environmental Assessment (DEIR/EA) for the I-80 Across the Top Bus/Carpool Lanes (proposed project; SCH# 2006092057). The project proposes to construct bus/carpool lanes in the median of Interstate 80 (I-80) in Sacramento County from east of the Sacramento River to Watt Avenue. The project also includes auxiliary lanes in the eastbound and westbound directions between the West El Camino Avenue interchange and the Interstate 5 (I-5)/I-80 separation, and between Northgate Boulevard and Norwood Avenue.

Wildlife habitat resources consist primarily of annual grassland, fresh emergent wetland, and riverine habitats (Mayer and Laudenslayer, 1988). Significant natural resources of the project include foraging and nesting habitat for the Swainson's hawk (*Buteo swainsoni*; SWH), and aquatic and upland habitat for the giant garter snake (*Thamnophis gigas*; GGS).

We offer the following comments and recommendations referenced by DEIR/EA content heading:

2.17.2.3 Giant Garter Snake

The DEIR/EA states that the proposed project may temporarily impact (2 seasons of impacts) 3.55 acres of giant garter snake (*Thamnophis gigas*; GGS) upland habitat, and may permanently impact 0.003 acres of GGS upland habitat. The DEIR/EA also states that as mitigation for these impacts, all areas temporarily disturbed during construction will be restored within one year of completion of the project, and in addition, 3.55 acres will be replaced through purchase of mitigation credits at a U.S Fish and Wildlife Service (USFWS) approved conservation bank. GGS is listed by the State as threatened.

The proposed project has the potential to take GGS, therefore these actions will require consultation with the DFG under the California Endangered Species Act (CESA), and may require an Incidental Take Permit. The DFG recommends that Caltrans consult with the DFG in addition to consulting with the USFWS for replacement habitat established to compensate for the above impacts.

L1a

2.17.2.3 Swainson's Hawk

The DEIR/EA states that the proposed project may impact Swainson's hawk (*Buteo swainsoni*; SWH) nesting and foraging habitat. The DEIR/EA indicates that some trees will likely need to be removed as a result of project activities, and will occur during the non-breeding season. However, if trees can not be removed during this time period, a qualified biologist will conduct a pre-construction survey to search for raptor nests, and if SWH are observed nesting, the DFG shall be consulted for establishing appropriate protective buffer zones. The DEIR/EA also indicates that foraging habitat will be eliminated under Alternative 1.

In order to lower the project's impact on nesting SWH to below a level that is significant, the DFG recommends that the DEIR/EA be revised to include that if project related activities are expected to occur within 0.25 miles of an active nest, Caltrans will consult with the DFG, and if necessary, obtain an incidental take permit issued pursuant to Fish and Game Code section 2081.

L1b

The DEIR/EA discusses mitigation measures to reduce impacts to SWH nesting habitat, however, it does not include mitigation measures to reduce impacts to SWH foraging habitat. In order to lower the project's impact on the SWH to below a level that is significant, we recommend that the DEIR/EA be revised so that it describes the amount of foraging habitat that will be lost as a result of the proposed project, and provide a means of compensation for that loss. Adequate compensation for loss of SWH foraging habitat consists of a dedication of the appropriate amount of acres to a suitable habitat condition, with permanent protection, management, and maintenance, and must occur within the Natomas Basin. The DFG further recommends that at a minimum, mitigation be established in accordance with the current Sacramento County ordinance relating to the SWH Impact Mitigation Program.

L1c

2.18 Cumulative Impacts

The DEIR/EA contains a discussion of cumulative impacts on natural resources by stating that "projects listed in Table 2.18-1 would result in temporary and permanent loss of roadside vegetation...wetlands, and wildlife habitat.

However, avoidance minimization and mitigation policies (such as habitat replacement and replacement of landscaping), construction BMP's, and requirements of federal, state, and local natural resource agencies...are expected to minimize and/or eliminate any adverse impacts to natural resources." The DEIR/EA also provides a statement that "in addition, environmental reviews, comprehensive plans, and other public processes are in place to ensure that the impacts of new development to natural resources would be minimized." However, there is no comprehensive and meaningful analysis of the proposed project's effects in addition to development "covered by" the existing Natomas Basin Habitat Conservation Plan (NBHCP) or the Metro Air Park Habitat Conservation Plan (MAPHCP), the potential impacts of all foreseeable future development in the basin, and the amounts and distribution of habitat needed in the basin to ensure the NBHCP's 22 Covered Species (Covered Species) survival, particularly the giant garter snake (*Thamnophis gigas*; GGS) and the Swainson's hawk (*Buteo swainsoni*; SWH).

CEQA Guidelines section 15130 states that "the following elements are necessary to an adequate discussion of significant cumulative impacts... a list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency..." These guidelines also require that "when utilizing a list... a summary of the expected environmental effects to be produced by those projects with specific reference to additional information stating where that information is available... and a reasonable analysis of the cumulative impacts of the relevant projects [be provided]. An EIR shall examine reasonable, feasible options for mitigating or avoiding the project's contribution to any significant cumulative effects." The cumulative effects analysis for the proposed project does not provide a complete list of past, present, and probable future projects producing related or cumulative impacts. Following, is a list of possible future projects, in addition to those described in Table 2.18-1 of the DEIR/EA, that may represent reasonable foreseeable cumulative development in the basin. The DFG recommends that the DEIR/EA contain an analysis of potential effects on the existing NBHCP and MAPHCP operating conservation programs, since the proposed project, in addition to the project listed below, may reduce available habitat for these species. The DFG also recommends that the DEIR/EA provide an update of the status of each of the below projects and any other project in the basin that are under active consideration, and assess whether or not the impacts of the projects on biological resources may be considered cumulative to the proposed project.

L1d

Mr. Ketchum
June 6, 2007
Page Four

Possible future projects in the Natomas Basin (in addition to those already mentioned in the DEIR/EA):

- American Basin Fish Screen Habitat Improvement Project
- Sacramento River Water Reliability Study
- DWR/USACE Critical Erosion Site Repairs
- Northwest Interceptor Project
- Natomas Joint Vision Plan
- Camino Norte Project
- WAPA Transmission Line
- PG&E Transmission Line
- Placer Parkway
- I-80 Median Lanes and Auxiliary Lanes Project Sacramento County
- Downtown to Natomas Light Rail Transportation Project
- Sacramento Municipal Utility Substation Expansion Projects (numerous)
- Greenbriar mixed use project
- Sutter Pointe Specific Plan

L1e

This project will have an impact to fish and/or wildlife habitat. Assessment of fees under Public Resources Code Section 21089 and as defined by Fish and Game Code Section 711.4 is necessary. Fees are payable by the project applicant upon filing of the Notice of Determination by the lead agency.

Pursuant to Public Resources Code Sections 21092 and 21092.2, the DFG requests written notification of proposed actions and pending decisions regarding this project. Written notifications should be directed to this office.

Mr. Ketchum
June 6, 2007
Page Five

Thank you for the opportunity to review this project. If the DFG can be of further assistance, please contact Mr. Todd Gardner, Staff Environmental Scientist, at (209) 745-1968 or myself at (916) 358-2382.

Sincerely,

A handwritten signature in black ink, appearing to read "Kent Smith", written in a cursive style.

Kent Smith
Habitat Conservation Program Manager

cc: Ms. Holly Herod
U.S. Fish and Wildlife Service
2800 Cottage Way, Room W2605
Sacramento, CA 95825-1888

Mr. Todd Gardner
North Central Region
Department of Fish and Game
1701 Nimbus Road, Suite A
Rancho Cordova, CA 95670

Literature Cited

Mayer, K.E. and W.F. Laudenslayer, Jr., eds. 1988. A guide to wildlife habitats of California. California Department of Fish and Game, Sacramento, California



DEPARTMENT OF
TRANSPORTATION

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May 31, 2007

Jeremy Ketchum
Environmental Branch Chief
Caltrans District 3 Sacramento Office, Environmental Planning
2389 Gateway Oaks Drive, Suite 100
Sacramento CA 95833

Dear Mr. Ketchum:

Thank you for the opportunity to review and comment on the I-80 "Across the Top" Bus Carpool Lanes Project (I-80 HOV Project).

The City of Sacramento would like to work with Caltrans to address the potential negative impacts of this project on freeway noise for adjacent residential neighborhoods. The I-80 HOV Project includes placement of auxiliary lanes between Norwood Avenue and Northgate Blvd and between West El Camino and the I-5 interchange, moving traffic closer to the residential neighborhoods which are already impacted by excessive vehicular noise. The additional HOV and auxiliary lanes will also allow for faster movement of truck and automobile traffic through this area during off-peak hours, which will also create greater noise volumes for existing residents.

L2

Noise impacts from this project are not identified as potentially significant because residents are already exposed to severe freeway noise impacts. Caltrans uses a per residence cost effectiveness measurement to decide whether to provide soundwall mitigation. However, only the number of existing residences are considered, not planned growth. As a result, at certain locations soundwalls are determined not to be reasonable mitigation. There are large undeveloped parcels in North Sacramento and North Natomas adjacent to the freeway that are designated for additional residential development and for increased density infill projects. We strongly encourage Caltrans to construct soundwalls along the corridor wherever residential development exists or is designated by the City of Sacramento.

If you have any questions regarding our comments, please contact Azadeh Doherty, Principal Planner at 808-3137.

Sincerely,

Francesca Lee Halbakken, P.E.
Operations Manager

cc: Marty Hanneman, Assistant City Manager
Jerry Way, Director of Transportation



909 12th Street, Suite 100 • Sacramento, CA • 95814 • (916) 420-4829

June 6, 2007

Mr. Jeremy Ketchum, Environmental Branch Chief
Attention: Ken Lastufka
California Dept. of Transportation, Environmental Planning
2389 Gateway Oaks Drive, Suite 100
Sacramento, CA 95833

Re: I-80 Across the Top Bus/Carpool Lanes Draft Environmental Impact Report/ Environmental Assessment

Dear Mr. Ketchum:

Thank you for the opportunity to comment on the Draft Environmental Impact Report/Environmental Assessment (DEIR) for the I-80 Across the Top Bus/Carpool Lanes Project (Project). Any articles or research cited in this letter are available on the Internet or in publicly available publications. If you are unable to locate any of the cited material, please feel free to contact me.

The Environmental Council of Sacramento (ECOS) hereby submits the following comments.

1. The DEIR fails to consider a reasonable range of alternatives as required by CEQA.

The CEQA Guidelines [California Code of Regulations, Title 14, ch. 3] require that an environmental impact report include a range of reasonable alternatives that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant impacts of the proposed project. (CEQA Guidelines, section 15126.6, subdiv. (c); see also *Preservation Action Council v. City of San Jose* (2006) 141 Cal.App.4th 1336, 1350.) After rejecting three alternatives considered in the 2006 Traffic Report prepared for the Project, the DEIR fully analyzes only a single "build" alternative and the obligatory "no build" alternative. By reviewing only a single alternative beyond the "no build" alternative, the DEIR fails to fulfill one of the fundamental purposes of CEQA review, namely the identification of ways that environmental damage can be avoided or significantly reduced. (CEQA Guidelines, section 15002, subdiv. (a)(2).)

The DEIR's statement of purposes cites three objectives:

1. to provide congestion relief in order to improve traffic flow on the regional transportation system;
2. to promote the use of high occupancy vehicles;

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Advocates for quality and balance of urban, rural and natural environment

L3a

3. to provide greater connectivity with the existing and proposed bus/carpool network in the Sacramento region. (DEIR, p. 1.)

A number of alternatives that would address the objectives of congestion reduction and promotion of high occupancy vehicles (including transit) were not considered by the DEIR. For example the Regional Rail Project discussed in SACOG's Metropolitan Transportation Plan (MTP) would provide peak period train service along the I-80 corridor from Auburn to Oakland. The plan includes a new station at Antelope Road and would stop at the Swanston light rail station and the Sacramento Valley Station. The Regional Rail Project could reduce congestion along I-80, encourage transit use, and avoid the traffic and growth-inducing impacts of the HOV alternative considered in the DEIR.

L3b

Another alternative not considered in the DEIR is construction of a truck-only toll lane open to freight trucks with enhanced emission controls. Given the amount of truck traffic on the I-80 corridor, and the persistent problem of pollution from trucks, a project that would facilitate efficient movement of goods along the freeway might improve congestion along the freeway in ways that minimize traffic volume impacts, growth-inducing impacts, land use impacts, and air quality impacts. **Please expand the DEIR to evaluate a reasonable range of project alternatives.**

L3c

2. **The DEIR fails to clearly indicate the significance of the environmental impacts discussed, nor does it explain the standards by which significance is determined.**

Despite the fact that the DEIR devotes more than 100 pages to the discussion of "environmental consequences" and "avoidance, minimization and/or mitigation measures," Table S-1 identifies one sole environmental impact (effects on giant garter snake habitat) that rises to the level of significance under the California Environmental Quality Act (CEQA). (DEIR, p. S-3.) The DEIR claims that "CEQA Guidelines Appendix G were used to establish significance criteria for each of the alternatives." (DEIR, § 3.1, p. 137.) However, Appendix G of the CEQA Guidelines contains no substantial discussion of significance criteria that can be used to interpret the DEIR's apparent conclusion that the vast majority of the Project's potential impacts do not rise to the level of significance for CEQA purposes. Absent a presentation of the criteria used to determine the threshold of significance for each species of potential environmental impact discussed in the DEIR, the conclusion that the impact on giant garter snake habitat is the only potentially significant impact of the Project is insupportable. **Please include a thorough discussion of the criteria of significance used to evaluate the potential environmental impacts of the Project, and descriptions of the whether each impact is considered "significant" or "not significant" before mitigation.**

L3d

3. **The DEIR fails to fully analyze potentially significant traffic-related impacts from the Project.**

The fundamental purpose of an environmental impact is to provide information regarding potential environmental impacts of proposed projects not only to agency decisionmakers, but also to the public in general. (*Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal. 4th 412, 428.) Despite the clear intent of CEQA to require that information on environmental impacts be made accessible to the public, the DEIR discussion of significant traffic-related impacts of the Project are buried in confusing charts in a technical appendix to the DEIR. (See *Traffic Report for the Interstate 80 Across the Top Environmental Impact Report/Environmental Assessment ("Traffic Report")*, included on a CD-ROM accompanying the DEIR, pp. 23-30.) A single column, entitled "vehicles served," in Table 2.5-1 is the only acknowledgement in the DEIR of the remarkable conclusion of the traffic study: **that construction of the Project would result in a 13% increase in total eastbound vehicle traffic along I-80 during the afternoon rush hours, when compared to the "no build" alternative, and a smaller increase in westbound traffic**

L3e

during the morning rush hours. The technical analysis admits that, due to limitations of the model used to project induced demand from the “build” alternative, this projection may *underestimate* the increase in demand that would accompany the build alternative.¹ (Traffic Report, p. 21.) The projection of increased traffic volume, and the caveat that actual increases in traffic volumes may be greater than projected, do not support the DEIR’s apparent (though unstated) conclusion that traffic-related impacts are less than significant.

Given the fact that I-80 is a major east-west artery for goods movement, the potential of the Project to induce increased truck traffic is especially important. The DEIR does not explain whether the projected increases in traffic volume include increased volumes of truck traffic. Because of the air quality impacts associated with diesel truck traffic, the DEIR should specify what proportion of the projected traffic increases are attributable to trucks.

L3f

The most important index of the Project’s potential traffic-related environmental impacts, projected increases in Vehicle Miles Traveled (VMT), is nowhere discussed in either the DEIR or the Traffic Report. **Please revise the DEIR to include projections of increases in VMT attributable to the Project and discuss mitigation measures to address the primary and secondary environmental impacts associated with the increase in vehicular traffic.**

L3g

Because the DEIR focuses on indexes of traffic impact like congestion and total number of persons served, there is absolutely no discussion of the increase in traffic volume attributable to the “build” alternative. Consequently, the DEIR fails to discuss one of the most significant potential impacts that would result from the proposed expansion of Interstate 80. This fundamental omission from the environmental analysis affects not only the traffic impact section, but also the review of secondary impacts accompanying the increase in traffic (e.g. air quality, noise, and energy consumption). Furthermore, the fact that the Traffic Report projects substantial increases in traffic volume as a result of the Project undermines the DEIR’s contention that there are no significant traffic, air quality, noise, or energy consumption impacts attributable to the Project. **Please expand the DEIR to fully describe all primary and secondary traffic-related environmental impacts that will accompany the projected increases in traffic volume resulting from the Project, including air quality impacts and impacts on traffic levels on city streets near the Project. In addition, please discuss mitigation measures to discuss these impacts.**

L3h

¹ A number of articles and models discuss methods of calculating travel effects attributable to HOV lanes and highway projects in general. Review of this literature should inform Caltrans’ efforts to accurately estimate the induced traffic impacts of its Project. See, e.g., Robert Cervero, “Induced Travel Demand: Research Design, Empirical Evidence, and Normative Policies,” *Journal of Planning Literature*, Vol. 17, No. 1, 2002, pp. 4-19; Robert Cervero, “Road Expansion, Urban Growth, and Induced Travel: A Path Analysis,” *Journal of the American Planning Association*, Vol. 69, No., Spring 2003, pp. 145-163; Patrick DeCorla Souza and Harry Cohen, “Estimating Induced Travel For Evaluation of Metropolitan Highway Expansion,” *Transportation*, Vol. 26, 1999, pp. 249-261; Phil Goodwin, “Empirical Evidence on Induced Traffic,” *Transportation*, Vol. 23, No. 1, 1996, pp. 35-54; Robert Johnston and Raju Ceerla, “The Effects of New High-Occupancy Vehicle Lanes on Travel and Emissions,” *Transportation Research*, Vol. 30A, No. 1, 1996, pp. 35-50; Robert Noland, “Relationships Between Highway Capacity and Induced Vehicle Travel,” *Transportation Research A*, Vol. 35, No. 1, January 2001, pp. 47-72, available at www.epa.gov/otaq/transp/hwycap.pdf. The Federal Highway Administration has published models for calculating induced travel effects from highway projects. (FHWA, *Spreadsheet Model for Induced Travel Estimation (SMITE)*, Federal Highway Administration (www.fhwa.dot.gov/steam/smite.htm) [transport planning model which incorporates generated traffic]; FHWA, *Surface Transportation Efficiency Analysis Model (STEAM)*, Federal Highway Administration (www.fhwa.dot.gov/steam)).

4. The DEIR fails to fully analyze the air quality impacts of the Project.

The Sacramento region is classified as a “nonattainment” area for both ozone and PM10. (*Air Quality Analysis Report*, included on a CD-ROM accompanying the DEIR, p. 1.) Furthermore, the Sacramento area regularly appears on lists as one of the cities with the worst ozone and PM2.5 pollution. (See, e.g., American Lung Association, *State of the Air 2007*, available at http://lungaction.org/reports/sota07_table2b.html.) Given the region’s ongoing struggle with unhealthy air, the air quality impacts of the proposed Project are particularly important. Under CEQA, the greater the existing environmental problems are, the lower the threshold should be for treating a project’s contribution to cumulative impacts as significant. (*Communities For A Better Environment v. California Resources Agency* (2002) 103 Cal.App.4th 98, 117-120.)

Despite the critical state of Sacramento’s air quality, the DEIR conducts an inadequate analysis of potential air quality impacts resulting from the project and apparently concludes that those impacts are less than significant. Relatively thorough, project-level analysis of air quality impacts is performed only for carbon monoxide. (*Air Quality Analysis Report*, pp. 7-9.) While the Air Quality Analysis Report also claims to conduct project-level analysis of PM10 particulate air pollution, the actual analysis is faulty. In fact, the PM10 analysis relies on the incorrect assertion that “project’s build alternatives will not increase vehicle miles of travel (VMT).” (*Air Quality Analysis Report*, p. 11.) Given the substantial increases in traffic volumes projected by the Traffic Report, the assumption of no increase in VMT is unsupported.²

L3i

The Air Quality Analysis Report further claims that no analysis of PM2.5 particle pollution is necessary, because the U.S. Environmental Protection Agency (USEPA) requires no conformity determination for project in regions, like Sacramento, that are classified as “attainment/unclassified” for PM2.5. (*Ibid.*) The fact that USEPA requires no conformity determination does not, however, affect Caltrans’ obligations under CEQA. The projected increase in traffic volumes resulting from the Project will clearly increase vehicle emissions (when compared to the “no build” baseline), and consequently the DEIR must examine all reasonably foreseeable adverse environmental impacts from the increase in vehicle emissions, including PM2.5. **Please revise the air quality impacts section of the DEIR to include full project-level analysis of impacts to all criteria pollutants and a discussion of mitigation measures.**

L3j

5. The DEIR fails to fully analyze the growth-inducing and land use impacts of the Project.

Analysis of the environmental impacts of the project should include a detailed study of growth-inducing effects, including ways that a project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. (CEQA Guidelines, section 15126.2(d).) Conclusory statements that growth will occur with or without the proposed project, by themselves, are insufficient. (See *Davis v. Mineta* (10th Cir. 2002) 302 F.3d 1104, 1122-23.) For transportation infrastructure projects, the environmental analysis should include separate growth projections for the build and no-build scenarios to adequately account for the growth-inducing impacts of the proposed project. (*Sierra Club, Illinois Chapter v. U.S. Dept. of Transportation* (1997) 962 F.Supp. 1037, 1043.)

L3k

² In the DEIR for the proposed HOV project along the Highway 50 corridor, Caltrans has inconsistently claimed that PM10 is not an issue for projects that will not increase diesel VMT. However, paved road dust (rather than direct diesel emissions) is the single highest PM10 emission category in the Sacramento County emission inventory. (http://www.arb.ca.gov/app/emsinv/emssumcat_query.php.) It stands to reason that PM10 impacts are reasonably foreseeable from any project that increases traffic volumes.

Contrary to the DEIR's assertions that the Project will not induce growth, transportation researchers and modelers have suggested that highway expansions, like the proposed Project, have measurable impacts on regional growth and land use. Robert Cervero, for example, has suggested that changes in land use patterns in response to transportation infrastructure development is one of the intermediate effects in a causal chain linking increased road capacity to increased traffic volumes. (Robert Cervero, "Road Expansion, Urban Growth, and Induced Travel: A Path Analysis," *supra*, note 1.) Integrated transportation-land use computer models make it possible to project the impact of transportation projects on regional growth and land use. Such an analysis is necessary to substantiate the DEIR's conclusion that the Project will not induce growth. In addition, projections of changes in land use as a result of the Project must inform analysis of the Project's traffic-related impacts.

The DEIR claims that the HOV lane alternative "would not create excessive new capacity that would induce new, unplanned growth," and concludes that the Project will not induce growth. (DEIR, p. 27.) At the same time, the DEIR explains:

By improving commute times, the project may encourage some commuters to look for housing in communities farther east than they otherwise would.... Given better travel times, commuters can choose to travel farther, taking advantage of the time savings to access new housing markets farther from the central city.... Bus/carpool lane users may be able to travel an additional five miles in the time they would otherwise spend making the commute between downtown Sacramento and Auburn. (DEIR, pp. 19-20.)

The DEIR's explanation of how the project might encourage commuters to move farther from the city center, combined with projections of a significant increases in the volume of vehicles *and* travelers in both directions along the I-80 corridor as a direct result of the Project, is not easily reconciled with the DEIR's assertion that the Project will not induce population growth. The DEIR's hopeful statements about job growth in Roseville (p. 20) and reliance on the overall jobs/housing balance projected under SACOG's Blueprint growth scenario³, do little to substantiate the "no induced growth" conclusion. **Please provide a comparative analysis of projected population distribution and land use patterns along the I-80 corridor for both the "build" and "no build" alternatives.**

L31

6. The DEIR fails to provide adequate project-level analysis of Greenhouse Gas Emission impacts.

The DEIR prefaces its discussion of the Project's impact on greenhouse gas emissions by citing a professional paper opining that any "individual project does not generate enough greenhouse gas emissions to significantly influence global climate change." (DEIR, p. 71.) Nevertheless, the DEIR claims that the Project would actually reduce carbon dioxide emissions, thanks to the salubrious effects of the reduction in vehicle hours traveled (VHT) and improved traffic flow.

The DEIR's assertion that the Project will reduce carbon dioxide emissions, however, appears irreconcilable with the projected increase in the number of vehicles "served" by the Project as compared to

³ The SACOG Blueprint, a regional policy statement on land use, is not binding on local land use planning agencies, and actual land use is likely to vary from the "preferred scenario" described in the Blueprint. Furthermore, as the DEIR accurately notes, the Blueprint scenario *assumes* that the proposed Project will be constructed. Therefore, the Blueprint cannot be used to answer the question of whether the Project will affect land use patterns along the corridor. Such an analysis would require land use modeling of *both* the "build" and "no build" options.

the no-build alternative. (See discussion in section 3, *supra*). Furthermore, the marginal projected decrease in VHT for the entire SACOG MTP scenario does not support the conclusion that the proposed Project, taken by itself, will reduce carbon dioxide emissions. The DEIR failure to fully discuss traffic-related impacts, growth-inducing impacts, and impacts on land use patterns further impedes accurate analysis of the Project's effect on greenhouse gas emissions. **Please expand the analysis of greenhouse gas impacts to explain impacts from projected increases in traffic and changes in population and land use patterns resulting from the project.**

L3m

7. The DEIR fails to adequately analyze the energy impacts of the Project.

The DEIR's analysis of potential energy impacts in section 2.14 consists of two conclusory statements, without any citation or evidentiary support, concerning the alleged energy-reducing effects of the "build" alternative. Given the projected increase in traffic induced by the project and described in Table 2.5-1, the claims that the Project will not increase energy demand is unsupported. In addition, a full analysis of the growth-inducing impacts and land use impacts may reveal additional sources of increased energy demand. **Please expand the analysis of energy demand impacts of the Project to account for the full range of foreseeable traffic, land use, and growth-inducing impacts.**

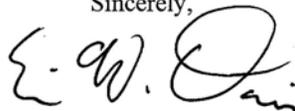
L3n

8. The DEIR fails to adequately analyze safety impacts of the Project.

An environmental impact report must include discussion of health and safety impacts associated with a proposed project. (CEQA Guidelines, section 15126.2, subdiv. (a).) Highway safety impacts of the Project are not discussed in the DEIR. The lack of attention to the safety impacts of the proposed freeway expansion fails to take account of the fact that expansion of road infrastructure, including the addition of lanes, has been associated with increased traffic-related accidents and fatalities. (Robert B. Noland and Lyoong Oh, *The Effect of Infrastructure and Demographic Change on Traffic-Related Fatalities and Crashes: A Case Study of Illinois County-Level Data*, Accident and Analysis Prevention 36 (2004) 525-532; see also Robert B. Noland, *Traffic Fatalities and Injuries: The Effect of Changes in Infrastructure and Other Trends*, Accident Analysis and Prevention 35 (2003), 599-611.) **Please expand the DEIR to adequately discuss the potential safety impacts of the Project.**

L3o

Sincerely,



Eric W. Davis
Co-Chair, Transportation and Air Quality Committee



909 12th Street Ste 114 Sacramento, CA 95814 (916) 444-6600 www.sacbike.org
June 6, 2007

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Jeremy Ketchum, Environmental Branch Chief
Attention: Ken Lastufka
Dept. of Transportation, Environmental Planning
2389 Gateway Oaks Drive, Suite 100
Sacramento, CA 95833

Sac I-80 Across the Top Bus/Carpool Lanes Project Draft Environmental
Impact Report/Environmental Assessment (DEIR/EA)

Dear Mr. Lastufka,

Thank you for the opportunity to comment on the DEIR/EA.

General comments

The DEIR/EA claims on p16 that "The project is consistent with SACOG's Regional Blueprint" and suggests the project is consistent with the 2006 Metropolitan Transportation Master Plan. By serving long-distance commuters the project is not consistent with a major thrust of the Blueprint which is to recognize the value of shorter trips and encourage short trips. Though the project was included in the MTP, projects in the MTP were never evaluated against the adopted MTP goals. If so evaluated the project would rank poorly in terms of at least half of the ten goals including quality of life, air quality, travel choices, health and safety and environmental sustainability.

L4a

The DEIR/EA should indicate that the project meets some, but not all, the goals of the Blueprint and MTP.

In the Transit Operations section on p.36, the Downtown-Natomas-Airport light rail line is not mentioned. This project should be included.

L4b

The Bus/Carpool Lanes project should be renamed because it is inaccurate and deceptive. It might as well be called the "nuclear-powered vehicle" lane as a bus lane project. The current name is intentionally misleading in describing the project as a bus/carpool lane and suggesting that it is multimodal. As the DEIR/EA indicates (p. 36), Regional Transit does not operate any buses in the study area. In fact, no local transit provider operates buses in the study area. The likelihood of a transit provider operating non-express buses in the study area is remote, as buses on freeways do not connect well to the surrounding community and pedestrian conditions around freeways are generally atrocious.

L4c

On p. 38, it's said "the proposed project could greatly improve travel time for commuter buses." Since no commuter buses use the study area, there is no basis for this statement.

L4d

If the term bus/carpool lane is to be used, Caltrans should identify what buses will use them and when, something beyond speculation about a possible, indeterminate future use

L4e

This project would further unbalance an already unbalanced transportation system. There is overwhelming agreement among transportation experts that too many trips are made by automobile now. Many of the environmental, economic, energy, health, safety and other consequences of those automobile trips are clearly undesirable. A transportation system focused on travel by automobile is ultimately unsustainable because of its enormous energy needs and the impacts on the environment, including the threat of catastrophic global climate change.

L4f

The I-80 carpool lane project adds capacity to the transportation system for automobiles, assuring that more and longer trips will be made by automobile for decades to come.

L4g

Purpose and Need

Carpool formation

One purpose of the project is to promote use of high occupancy vehicles. However, no evidence is provided that adding HOV lanes and increasing freeway capacity actually do promote increased use of high occupancy vehicles. Though HOV lanes are filled with high occupancy vehicles where they exist, it is not clear from the DEIR/EA whether adding HOV lanes would simply result in current multi-occupant vehicles to move over from mixed flow lanes or whether the lanes would cause new carpools to be formed.

L4h

A key project parameter should be how many carpools are formed. But it appears the project doesn't rely on an increased number of carpools to reduce congestion. Congestion will be reduced, at least temporarily, but it appears the reduction will result not from the formation of new carpools but because of the increased number of lanes.

L4i

As indicated above, it is possible that existing "carpools," which typically are carpools of convenience such as spouses sharing a ride or parents taking children to school, will switch from mixed-flow lanes to the HOV lanes. That will free up capacity in the mixed flow lanes making them less congested. With less congestion in the mixed flow lanes the time saving incentive that HOV lanes might have offered will be reduced. Most single occupant vehicle drivers won't bother trying to form a non-familial carpool unless their time savings are substantial—that is, great enough to compensate for the time and inconvenience of carpooling.

L4j

Since one of the stated project goals is to provide incentives for commuters to use carpools, vanpools or buses for peak period travel, we believe the project should include an evaluation component to see if it effective in doing so. In addition, the DEIR evaluation of project alternatives should include an analysis of the likely impacts on carpool formation. It would be useful if the

L4k

DEIR did the same analysis for the "take a lane" alternative which was eliminated based on performance.

Range of Alternatives

The DEIR/EA does not include a reasonable range of alternatives. Evaluations were made on a single build alternative and a no build alternative. A number of other alternatives, including HOT lanes and "Take-a-lane", were considered but eliminated. These two other alternatives were not evaluated in the DEIR/EA; therefore it is not possible to determine whether they were environmentally superior. Take-a-lane was eliminated because it would have 43 percent less capacity than Alternative 1. However, the purpose of EIR/EA is not to evaluate automobile capacity, but to evaluate environmental impacts. It is possible others alternatives would meet project purposes with fewer and less severe environmental impacts, could be done with less expense and would do more to stimulate mode choice away from single-occupant-vehicles.

L4l

Alternatives not evaluated include adding auxiliary lanes only, Bus Rapid Transit only, High Occupancy Toll (HOT) lanes, taking an existing lane for HOV use and a combination of HOT/Take-a-lane). Not a single non-freeway oriented alternative was evaluated. No alternative that viewed the transportation system as an integrated whole connected to land uses was evaluated.

L4m

A larger range of reasonable alternatives exists. For example, "A Comparison of Highway and Travel Demand Management Alternatives Using an Integrated Land Use and Transportation Model in the Sacramento Region," by Caroline J. Roder, John E. Abraham and Robert A. Johnston (Transportation Research Board meeting, January, 2002) concludes that there are alternatives that would be environmentally superior as well as superior in reducing congestion. The study abstract says, "...transit investment with supportive land use polices or pricing policies may be very effective in reducing VMT and emissions. Fourth, transit investment with supportive land use or pricing policies may provide congestion reduction that is as great, if not greater, than highway investment policies."

L4n

The DEIR/EA should evaluate a reasonable range of alternatives that meet most or all project goals. These alternatives should include alternatives that take a system-wide approach to transportation.

Growth inducement (Section 2.2)

On page 27 of the DEIR/EA there is the following statement: "...the project would not contribute to any cumulative growth inducement impacts..." This statement is incorrect. "A Comparison of Highway and Travel Demand Management Alternatives Using an Integrated Land Use and Transportation Model in the Sacramento Region," by Caroline J. Roder, John E. Abraham and Robert A. Johnston concludes that "transportation investment in both highway and light rail may allow for greater decentralization of regional development."

L4o

In addition, no specific data or study is necessary to conclude that while transportation may follow land use, that it is equally true that land use follows transportation.

L4p

The DEIR/EA should reassess the growth inducing impacts of the project.

Pedestrian and Bicycle Facilities

Section 2.5.2.2 concludes that "Alternative 1 would not permanently affect and bicycle routes." This is not correct.

Every interchange and every street is a bicycle and pedestrian facility. Bicyclists and pedestrians need to cross freeways and crossings generally are few and far between. Widened freeways will have more automobile traffic especially at interchanges, but also on surface streets, making them more dangerous, more intimidating and less desirable for bicyclists and pedestrians. The safety problems will discourage bicycle use.

L4q

Widening I-80 will affect bicyclists in others ways besides the facility impacts. It will encourage longer trips and more suburban trips. These are trips less likely to be made by bike. It will use scarce transportation funds that could be spent on bicycle projects and other projects that do less damage to air quality and the environment.

L4r

As mitigation for the impacts on bicyclists and pedestrians, the project should include improved or additional ways for bicyclists and pedestrians to cross I-80 safely. This could be done by separate overcrossings or interchange design.

L4s

Greenhouse Gas Emissions

It's cheering that greenhouse gas emissions is a topic that is acknowledged. Unfortunately the response seems to be all of the following

L4t

"It's not a problem."

"Yes, it's a problem, but we can't do anything about it"

"We don't know how to figure out how big a problem it is, either from this project or cumulatively."

The DEIR/EA says there will be a reduction in Vehicle Hours Traveled and improved traffic flow, so carbon dioxide emissions will be reduced. But there are no numbers for what traffic volumes, and by extension, greenhouse gases, will be for the project "alternatives".

L4u

The DEIR/EA says one of the main strategies to reduce greenhouse gas emissions is to make California's transportation system more efficient. Is this the best strategy? We don't know.

There are a number of strategies that Caltrans could pursue to reduce greenhouse gases. Besides "greening" its own fleet, Caltrans can be encouraging and working towards a shift to transportation modes that produce fewer greenhouse gases. Instead, this project focuses on an

L4v

accommodation of the transportation mode that contributes the most greenhouse gas emissions.

About 40 percent of greenhouse gases in California come from the transportation sector. Clearly, transportation projects cumulatively affect greenhouse gases and global warming.

The DEIR/EA should evaluate impacts of greenhouse gas emissions and address specific steps that are within Caltrans control, or that could be taken in partnership with other entities, to reduce those emissions.

L4w

Air Quality Section 2.12 and Energy Section (2.14)

The DEIR/EA claims alternative 1 for the project will not increase vehicle miles traveled and that energy demand would be reduced by the project. However, the traffic report included with the technical documents shows that the 2034 traffic volumes in both east and westbound directions will be higher with the project than without. This contradiction needs to be explained.

L4x

In addition, the study previously cited, "A Comparison of Highway and Travel Demand Management Alternatives Using an Integrated Land Use and Transportation Model in the Sacramento Region," by Caroline J. Roder, John E. Abraham and Robert A. Johnston concludes that "new highway capacity projects, even if they include HOV lanes, may increase VMT and emissions.

The DEIR/EA itself notes that "...addition of transportation infrastructure may induce growth by allowing access to previously inaccessible areas." Adding capacity to the freeway is functionally the same as increasing access. Additional capacity will encourage sprawling growth and more and longer vehicle trips. While growth is projected to occur with or without the freeway expansion, there can be little doubt that the location of that growth will affect vehicle miles traveled and emissions.

We believe that evidence and common sense suggests that freeway expansion will affect location of growth. Greenfield developers and land speculators support road expansion because they believe road expansions are profitable for them. Functionally a gridlocked freeway would be the same as no access at all. At the other end of the spectrum, the more free-flowing a freeway, the more access it creates and the more growth is induced in outlying areas. See related discussion on growth inducement.

The claim is made that Alternative 1 would reduce energy demand, but there is no substantiation of this claim other than the assertions that congestion would be less and that ridesharing would increase. There is no discussion of the possibility of induced demand.

L4y

The DEIR/EA should reassess the energy impacts and changes to vehicle miles traveled.

Biological Environment

2.17.3.2 indicates Western Burrowing Owls were not observed. I've seen what I believe to be burrowing owls just south of the I-80 bridges over Steelhead Creek along the Ueda Parkway trail.

L4z

Cumulative Impacts (Section 2.18)

Air Quality

There is no assessment of the impacts of fine, very fine and ultra fine particulates. These impacts should be assessed.

L4aa

Circulation and Access

There is no assessment of cumulative impacts to bicyclists and pedestrians. These impacts should be assessed.

L4bb

Noise

There is no assessment of any change in noise duration. This impact should be assessed.

L4cc

Table 2.18.1

Development projects in Placer, Yuba and Sutter Counties are not mentioned. The proposed annexation by the city of Sacramento and development of the "Panhandle" area, directly adjacent to the study area, is not included. The possible impacts of these projects should be considered.

L4dd

Environmental Impacts Not Evaluated

The DEIR/EA does not identify any significant impacts to air quality, increased noise, groundwater and stormwater quality due to the increased amount of impervious surfaces. Alternative 1 would add 28 lane miles of impervious surface and additional lane miles for auxiliary lanes by paving the mowed median and other areas. The environmental impacts from the additional impervious surfaces should be evaluated and mitigation should be proposed.

L4ee

Air Quality

The DEIR/EA does not address the significant impacts of very fine and ultra fine particulates and other possible pollutants that increase health risks within one mile of high volume traffic corridors. Studies in the Sacramento area and southern California have identified the geographic extent of the impact and the health risks. (See Sacramento Bee article, "Living near busy roads tied to kids' lung risk, Impact on breathing is long-term health threat, study says" January 26, 2007.)

L4ff

Children breathing the polluted air are at increased risk of lung and heart disease. While the DEIR/EA lists 35 schools within the study area, it does not provide their distance from I-80 making it difficult to assess what the impacts to children would be. In addition, there are parks, libraries, residences and commercial buildings adjacent to I-80.

L4gg

The California Air Resources Board requires Health Risk Assessments when new land uses are planned near high volume roadways. There are impacts when new land uses come to roads. There are also impacts when in effect, as for this project, wider roads come to land uses. The same Health Risk

L4hh

Assessments should be made when new freeway lanes and greater capacity/vehicle emissions are added near existing land uses, especially when the land is occupied by sensitive receptors.

The DEIR/EA should fully evaluate impacts of particulate and toxic air pollution in the corridor. If this project goes forward despite the impacts, it should include the planting of the most appropriate tree species along I-80 to mitigate the distribution of air pollution caused by I-80 traffic.

L4ii

Traffic circulation on local streets

The DEIR/EA does not address the traffic circulation impacts on local streets. The project is designed to increase I-80 capacity and the DEIR/EA acknowledges that I-80 traffic volume will increase because of the project. Yet there is no assessment of the environmental impacts, such as traffic circulation, noise, and air quality on the surface streets that must carry the increased traffic volume to and from the freeway.

L4jj

Parking

In addition to traveling on local streets, the increased traffic resulting from the project will eventually need to park. There is no assessment in the DEIR/EA of the land use ramifications of this additional parking, the aesthetic impacts of the parking or what increase there might be in impervious surfaces. Since roads and parking can consume 30 percent or more of the surface area, this may be a significant impact.

L4kk

The DEIR/EA should analyze impacts of additional traffic and parking requirements.

SABA is an award winning nonprofit organization with more than 1,400 members. We represent bicyclists. Our aim is more and safer trips by bike. We're working for a future in which bicycling for everyday transportation is common because it is safe, convenient and desirable. Bicycling is the healthiest, cleanest, cheapest, quietest, most energy efficient and least congesting form of transportation.

Yours truly,



Walt Seifert
Executive Director

June 6, 2007

Jeremy Ketchum, Environmental Branch Chief
Department of Transportation
Environmental Planning
2389 Gateway Oaks Drive, Suite 100
Sacramento, CA 95833

RE: I-80 Across the Top Bus/Carpool Lane Project Draft EIR/EIS
SMAQMD#: SAC200701111

Dear Mr. Ketchum:

Thank you for providing the Sacramento Metropolitan Air Quality Management District the opportunity to review and comment on the above referenced project document. Staff comments are as follows:

1. Notwithstanding the conformity finding for the Metropolitan Transportation Plan, of which this project is a part, there is no analysis summarized in the document to illustrate any possible operational impacts of this project and related mitigation, if available. The approved CEQA threshold for operational emissions is 65 pounds per day of ROG or NOx. **L5a**
2. A project of this size will likely generate short term (construction) impacts which exceed current a SMAQMD adopted CEQA threshold for construction of 85 lbs/day for NOx. An air quality analysis should be done to verify all impacts. Any impacts that result in an exceedance of the threshold we recommend our current Standard Construction Mitigation (<http://www.airquality.org/ceqa/index.shtml#construction>) be applied. **L5b**
3. Construction projects are subject to all District rules that may be in affect at the time of construction. An attachment outlining some of those rules is provided for your information. For further details on all District rules please refer to the our website at www.airquality.org or call Compliance Assistance at (916)874-4884. **L5c**

Please contact me with questions regarding these comments at (916) 874-4883 or cmcghee@airquality.org.

Sincerely,



Charlene McGhee
Associate Air Quality Analyst

Attachment

c: Larry Robinson, Sacramento Metropolitan AQMD

SMAQMD Rules & Regulations Statement (revised 1/07)

*The following statement is recommended as standard condition of approval or construction document language for **all** development projects within the Sacramento Metropolitan Air Quality Management District (SMAQMD):*

All projects are subject to SMAQMD rules and regulations in effect at the time of construction. A complete listing of current rules is available at www.airquality.org or by calling 916.874.4800. Specific rules that may relate to construction activities or building design may include, but are not limited to:

Rule 201: General Permit Requirements. Any project that includes the use of equipment capable of releasing emissions to the atmosphere may require permit(s) from SMAQMD prior to equipment operation. The applicant, developer, or operator of a project that includes an emergency generator, boiler, or heater should contact the District early to determine if a permit is required, and to begin the permit application process. Portable construction equipment (e.g. generators, compressors, pile drivers, lighting equipment, etc) with an internal combustion engine over 50 horsepower are required to have a SMAQMD permit or a California Air Resources Board portable equipment registration.

Rule 403: Fugitive Dust. The developer or contractor is required to control dust emissions from earth moving activities or any other construction activity to prevent airborne dust from leaving the project site.

Rule 417: Wood Burning Appliances. Effective October 26, 2007, this rule prohibits the installation of any new, permanently installed, indoor or outdoor, uncontrolled fireplaces in new or existing developments.

Rule 442: Architectural Coatings. The developer or contractor is required to use coatings that comply with the volatile organic compound content limits specified in the rule.

Rule 902: Asbestos. The developer or contractor is required to notify SMAQMD of any regulated renovation or demolition activity. Rule 902 contains specific requirements for surveying, notification, removal, and disposal of asbestos containing material.

Other general types of uses that require a permit include dry cleaners, gasoline stations, spray booths, and operations that generate airborne particulate emissions.

SMAQMD Recommended Mitigation for Reducing Emissions from Heavy-Duty Construction Vehicles

Only For Projects With Construction Emissions Above the CEQA Threshold of Significance

Revised December 9, 2005

Category 1: Reducing NOx emissions from off-road diesel powered equipment

The project shall provide a plan, for approval by the lead agency and SMAQMD, demonstrating that the heavy-duty (> 50 horsepower) off-road vehicles to be used in the construction project, including owned, leased and subcontractor vehicles, will achieve a project wide fleet-average 20 percent NOx reduction and 45 percent particulate reduction¹ compared to the most recent CARB fleet average at time of construction; and

The project representative shall submit to the lead agency and SMAQMD a comprehensive inventory of all off-road construction equipment, equal to or greater than 50 horsepower, that will be used an aggregate of 40 or more hours during any portion of the construction project. The inventory shall include the horsepower rating, engine production year, and projected hours of use or fuel throughput for each piece of equipment. The inventory shall be updated and submitted monthly throughout the duration of the project, except that an inventory shall not be required for any 30-day period in which no construction activity occurs. At least 48 hours prior to the use of subject heavy-duty off-road equipment, the project representative shall provide SMAQMD with the anticipated construction timeline including start date, and name and phone number of the project manager and on-site foreman.

and:

Category 2: Controlling visible emissions from off-road diesel powered equipment

The project shall ensure that emissions from all off-road diesel powered equipment used on the project site do not exceed 40 percent opacity for more than three minutes in any one hour. Any equipment found to exceed 40 percent opacity (or Ringelmann 2.0) shall be repaired immediately, and the lead agency and SMAQMD shall be notified within 48 hours of identification of non-compliant equipment. A visual survey of all in-operation equipment shall be made at least weekly, and a monthly summary of the visual survey results shall be submitted throughout the duration of the project, except that the monthly summary shall not be required for any 30-day period in which no construction activity occurs. The monthly summary shall include the quantity and type of vehicles surveyed as well as the dates of each survey. The SMAQMD and/or other officials may conduct periodic site inspections to determine compliance. Nothing in this section shall supercede other SMAQMD or state rules or regulations.

¹Acceptable options for reducing emissions may include use of late model engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, and/or other options as they become available.

Appendix J: Response to Comments

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RESPONSES TO PUBLIC COMMENTS

Workshop Comments

Response W1 – W8

Noise measurements were taken at the concerned residences on May 14, 2007. The results ranged from 46.5 dBA to 53.5 dBA. It is anticipated that the project would increase these levels by less than 2 dBA. The level to consider noise abatement is 66 dBA.

Response W9

Decisions about how transportation funding will be distributed are made by local government, the Sacramento Area Council of Governments, the California Transportation Commission, and the voting public. As detailed in Section 1.7 of the EIR/EA, in 2004 voters in Sacramento County approved the renewal of the Measure A sales tax by 74%, which specifically listed bus/carpool lanes on I-80 as one of the projects to be funded through the measure. In urban areas with air quality conformity concerns it is very difficult to obtain approval of new general purpose lanes; bus/carpool lanes are a viable and practical alternative.

As measured by the number of persons moved, carpool lanes are more efficient than general purpose lanes. The carpool lane provides a travel time savings for ridesharing and/or transit, and thus increases the use of these travel modes that have less pollution per person than driving alone. The advantages of carpool lanes are summarized in Section 1.3 of the EIR/EA.

Email Comments

Response E1

Comment noted. The Sacramento Fire Department will be notified in advance in the event of lane and/or ramp closures during construction.

Response E2

Bus/carpool lanes have consistently demonstrated their utility in enabling the movement of more people in fewer vehicles, at higher travel speeds than occurs in adjacent regular freeway lanes. However, the 65 mile per hour speed limit for autos along with the 55 mile per hour speed limit for autos with trailers and trucks will remain in effect, even for bus/carpool lanes, to ensure the safety of the traveling public. Speed limits on I-80, as with other interstate routes throughout the county, are regulated by the federal government. The maximum speed limit allowed under state law is 70 mph. The typical maximum speed limit is 65 mph. The speed limit has been raised to 70 mph only on freeways in rural areas, which do not have the urban-area congestion. The proposed carpool lane would be a fourth travel lane.

Response E3a

Based on information provided by Mr. Airola, Caltrans biologists confirmed this burrowing owl nest site, with a pair of burrowing owls. While observing this nest site, a local birdwatcher informed Caltrans that he had recently seen at least five young at the nest site. A single burrowing owl was observed at a ground squirrel den on the west levee, approximately 1,500 feet north of the I-80 bridge over the Natomas East Main Drainage Canal (NEMDC). This information has been added to the EIR/EA.

All burrowing owl nests observed were outside the project study area. If burrowing owls are found nesting at this site, or other locations within or adjacent to the project site, prior to the construction period, the California Department of Fish and Game will be consulted on appropriate measures to minimize disturbance to burrowing owls.

Response E3b

Caltrans biologists also observed Swainson's hawks in the vicinity of the NEMDC/I-80 overcrossing, and on May 21, 2007, discovered an active Swainson's hawk nest within the I-80/Northgate Boulevard interchange, between Northgate Boulevard and the eastbound onramp from Northgate Boulevard. This information has been added to the EIR/EA.

Response E3c

Exclusion devices may not be used if other measures are available that would minimize disturbance to martins during construction, and reduce long-term effects to martins. Caltrans will ensure that the most effective methods to minimize disturbance to purple martins are in the Plans, Specifications and Estimates (PS&E).

At this point, it is not possible to know if the contractor can commit to a specific work window at or near structures that support nesting martins, during the non-breeding season (before May 1 or after September 1). The contractor will be advised to avoid these structures during the breeding season to the extent feasible.

Response E3d

Caltrans will evaluate the feasibility of removing the trees referenced in the comment.

Response E3e

Because European starlings are very prolific, removal of starlings would involve a long-term, and potentially costly effort. However, because valley oaks are a sensitive species, removal and replacement of valley oak trees would not be a practical method of starling control.

Response E3f

If obstructions (exclusion devices) are required to minimize disturbance to martins, they shall be removed as soon as construction activities have been completed.

Response E3g

The widening of the Natomas East Canal structure is not designed to exclude birds. All box girder bridges (such as Natomas East Canal structure) require soffit vents (Standard Plan B7-1 Detail V-1). There is nothing preventing birds from accessing box girder cells through these vents. Caltrans is not purposely designing bridges to exclude birds.

Letter Comments

Response L1a

Caltrans has consulted with California Department of Fish and Game (CDFG) regarding potential impacts to giant garter snake (GGS). Information regarding this consultation has been added to the EIR/EA.

Response L1b

If a Swainson's hawk is found nesting within 0.25-mile of the project site, Caltrans will consult with CDFG to develop and implement appropriate measures to minimize disturbance to that nest.

Response L1c

Caltrans has determined that the project will not result in a significant loss of Swainson's hawk foraging habitat. The area of vegetated shoulder that will be permanently removed is small, approximately 1.6 acres. In the Draft EIR/EA, the amount of disturbed area was calculated at approximately 7.0 acres. However, since then the design of the project has undergone refinement and the amount of disturbed area has been reduced to 1.6 acres. Please refer to Section 2.17 of the Final EIR/EA.

This less than significant determination was made based on the small amount of land to be affected, the marginal habitat quality it may provide, its proximity to approved future development, and its classification as developed under the Natomas Basin Habitat Conservation Plan (NBHCP).

Caltrans does not consider the land occurring in the median or along the shoulders as an important component of foraging habitat for Swainson's hawk in the area for the following reasons:

- The Final Natomas Basin Habitat Conservation Plan prepared for CDFG and USFWS states that highways, airport and other uses in the Basin are urbanized and do not provide habitat for Covered Species or require mitigation (page III-6). The document defines highways as "Interstates 5 and 80, S.R. 99/70, and interchanges, including all areas within medians" (page III-8).
- The constant, high volume of traffic throughout the day and night along this multi-lane major interstate freeway limits the potential for the recruitment and dispersal of small rodents into and out of the median;
- The close proximity of the freeway traffic lanes on both sides of the narrow median renders this area unfavorable and hazardous as foraging habitat.
- The vegetation in the median and shoulders is actively managed in order to decrease fire hazards. This management involves frequent mowing and use of pre-emergent herbicides in the fall to reduce vegetation growth, thus eliminating cover for rodents;
- The soil is compacted as a result of the original highway construction. Compaction limits rodent burrowing abilities;
- Most adjoining properties along both sides of I-80 through the project limits are either developed, under development, or approved for future urban-type development.

Regarding CDFG's comment that Caltrans establish mitigation in accordance with the current Sacramento County Swainson's hawk ordinance, the ordinance does not apply to the State of California. However, if the county ordinance did apply, Caltrans has determined that the project does not significantly impact Swainson's hawk foraging habitat; no mitigation is required. Furthermore, the project would result in 0 acres of habitat value due to the highways' non-agricultural zoning designation.

Response L1d

This cumulative analysis is response to the comment by CDFG. Other resources, including the 3.0 acres of temporary GGS upland habitat impacts within the Natomas East Main Drainage Canal, were analyzed in the EIR/EA. Below is the cumulative effects analysis for biological resources of the additional projects included in the comment, plus several projects from the EIR/EA that are also located within the Natomas Basin. One project, DWR/USACE Critical Erosion Site Repairs Project, does not have any features within the Basin and was not included in the cumulative analysis. Four projects, American Basin Fish Screen Habitat Improvement Project, Placer Parkway, SMUD Metro Air Park Neighborhood Electric Transmission Project and Sutter Pointe Specific Plan Project, are located within the permitted areas of either the Natomas Basin Habitat Conservation Plan (NBHCP) or the Metro Air Park Habitat Conservation Plan (MAPHCP).

Ten projects are proposed within the Natomas Basin and outside the permitted areas of the NBHCP MAPHCP and thus are included in this analysis: Camino Norte – Leona Circle, Downtown to Natomas Light Rail Expansion, Greenbriar Project, Lower Northwest Interceptor Project, Natomas Joint Vision, PG&E Line 406/407 Pipeline Project, SAFCA Natomas Levee Improvement Program Landside Improvements Project, Sacramento International Airport Master Plan, Sacramento River Water Reliability Study, and SMUD Power Line – Elkhorn Substation Capacity Expansion Project. Each project is discussed in detail below, and included on Figure L1-1 and in Table L1-1.

Because the proposed I-80 bus/carpool lane project may affect two of the 22 species included in the Natomas Basin HCP (giant garter snake and Swainson's hawk), this cumulative analysis focuses on only these two species.

Habitat Conservation Plans (HCP)

Natomas Basin HCP

The Natomas Basin HCP (NBHCP), adopted in November 1997 and revised in 2003, was designed to promote biological conservation along with economic development and continuation of agriculture in the 53,341-acre Natomas Basin, located in portions of northern Sacramento and southern Sutter Counties. The NBHCP was also prepared to satisfy a condition of an U.S. Army Corp of Engineers permit, with the program implementation under the direction of the U.S. Fish and Wildlife Service, California Department of Fish and Game, and the City of Sacramento. Plan participants include:

- Wildlife Agencies (USFWS and CDFG) are the *Permitters*;
- City of Sacramento, Sutter County, the Natomas Basin Conservancy (TNBC), RD 1000 and Natomas Mutual are the *Permittees*;
- The TNBC, which will carry out the mitigation requirements of the NBHCP on behalf of the other Permittees, is the *Plan Operator*.

The permittees have permit areas within their jurisdictions. A permit area is defined as the area designated in the NBHCP Implementation Agreement that either totals a number of acres (City of Sacramento and Sutter County) or contains specific features (Natomas Mutual, RD 1000, and TNBC). Specific permit area information for each permittee is as follows:

- City of Sacramento: 8,050 acres
- Sutter County: 7,467 acres
- Natomas Mutual: Canals, ditches, waterways, ponds and open water areas, as well as roads, right-of-ways, facilities, maintenance yards, pumps, pipelines, and water detention facilities, under the direct jurisdiction of Natomas Mutual
- RD 1000: Canals, ditches, waterways, ponds and open water areas, as well as roads, right-of-ways, facilities, maintenance yards, pumps, pipelines, and water detention facilities, under the direct jurisdiction of RD 1000 and inside the inner toe of levees surrounding the Natomas Basin, but not including the Sacramento River levees.
- TNBC: All lands within the Natomas Basin

The NBHCP established a multi-species conservation program to mitigate the expected loss of habitat and incidental take of protected species that would result from urban development, operation of irrigation and drainage systems, and rice farming. Twenty-two species were included, but the primary species were Giant garter snake (*Thamnophis gigas*) and Swainson's hawk (*Buteo swainsoni*). To meet the mitigation goals of the NBHCP, a mitigation fee is paid to the Conservancy by developers of projects when they apply for building permits. New developments within the permit areas are required to mitigate impacts to the 22 species at a 0.5 to 1 ratio, whereas developments outside the permit areas, but still within the NBHCP, will also be required to mitigate the impacts at some negotiated ratio to offset these impacts. The Conservancy then uses the mitigation fees to acquire, restore, and manage mitigation lands to provide habitat for protected species and maintain agriculture in the Basin. By the end of 2006, the Conservancy had acquired approximately 28 mitigation properties totaling nearly 4,200 acres.

The NBHCP was prepared to satisfy a condition of an U.S. Army Corp of Engineers permit, with the program implementation under the direction of the U.S. Fish and Wildlife Service, California Department of Fish and Game, and the City of Sacramento. The original HCP authorized approximately 17,500 acres of land for development within the permit areas of the Natomas Basin. The Metro Air Park development east of the Sacramento International Airport formed it's own HCP, reducing the total NBHCP development acreage from 17,500 to 15,608.

Metro Air Park HCP

The Metro Air Park HCP (MAPHCP) encompasses 1,892 acres within the Natomas Basin. The MAPHCP was originally included within the NBHCP, but because the Metro Air Park project proposed by the Metro Air Park Property Owners Association (a non-profit mutual benefit corporation representing 138 individual property owners) was outside the City of Sacramento limits, the project was not covered by the City's incidental take permit. The Association sought a separate incidental take permit for the Metro Air Park project. The mitigation ratio within the MAPHCP is 0.5 to 1.

Projects Within the Natomas Basin and Outside the Permitted Areas of the NBHCP and MAPHCP

Camino Norte – Leona Circle Project

The Camino Norte project is a 390-acre Sphere of Influence area annexation to the City of Sacramento located generally east of El Centro Road, south of the West Drainage Canal, and north of Interstate 80. The Sacramento Local Agency Formation Commission retained an environmental consultant (Jones and Stokes) in February 2007 to prepare CEQA documentation on this annexation. The CEQA document is expected to be an Initial Study/Negative Declaration to be released in late 2007.

Downtown to Natomas Light Rail Expansion

The Sacramento Regional Transit District (RT) is undertaking a study to expand transit service to the area between downtown Sacramento and the Sacramento International Airport (about 13 miles in length). The study area for the DNA Corridor includes most of downtown Sacramento, South Natomas, North Natomas, Metro Air Park and the entire Sacramento International Airport property. Several different alignments were examined. The alignment for the Locally Preferred Alternative (LPA) selected in December 2003 starts in downtown Sacramento and passes the Amtrak Station and through the Railyards area. The alignment continues north through South Natomas and into North Natomas, passing the Arco Arena to reach the North Natomas Town Center. At the Town Center, the alignment shifts to the west and continues northwest to the Metro Air Park development and the Sacramento International Airport.

Most of the project would traverse other areas and projects included in this analysis; the permitted area of the City of Sacramento, Greenbriar, and MAPHCP. The project would affect approximately 16 acres of habitat south of the Sacramento International Airport.

Greenbriar Project

Greenbriar is a 577-acre project site located in unincorporated Sacramento County, just west of the City of Sacramento. The site is immediately north of Interstate 5 (I-5) and west of State Route 70 and 99 (SR 70/99). The site is adjacent to existing agricultural uses to the north and west and residential land uses to the east and south, which are part of the North Natomas Community Plan (NNCP) area. Land to the west of the project site has been approved by Sacramento County for commercial and industrial development as part of the Metro Air Park (MAP) project. According to the City of Sacramento, Greenbriar is included in the Natomas Joint Vision Plan, which is located within the NBHCP boundary. In November 2005, the City Council and LAFCo agreed to allow Greenbriar to go forward ahead of the balance of the Natomas Joint Vision area. The project site primarily consists of undeveloped, agricultural land that has been historically rotated between rice, alfalfa, wheat, and row crops. A portion of the site supports remnants of former agricultural buildings and a former racetrack for horses. The project would result in the development of a total 3,473 residential units: 671 low-density, 2,215 medium-density; and 587 high-density residential units, approximately 27.5 (net) acres of commercial land uses, an approximate 39-acre (net) lake/detention basin, a 10-acre (net) elementary school, approximately 49 (net) acres of parks and open space, and a 250-foot linear open space/buffer along the property's western boundary that would be managed as habitat for the giant garter snake.

Lower Northwest Interceptor Project

The Lower Northwest Interceptor (LNWI) Project, proposed by the Sacramento Regional County Sanitation District (SRCSD), involves construction of wastewater conveyance facilities as well as facilities to provide ongoing operations and maintenance support. The proposed facilities include force mains, gravity line, tunnels, manholes, air release valves, blow-off valves, pump stations, surge tanks, transition structures, valve structures, temporary access roads, access roads, temporary staging areas, power lines, power substation, and temporary batch plants. Approximately 25 acres within the Natomas Basin would be affected by the project.

Natomas Joint Vision Plan

The Joint Vision Plan is a collaborative effort between the City and County of Sacramento to develop a vision for the 12,700-acre area of the County between the northern city limits and Sutter County. The Natomas Joint Vision Study Area is located north of the City of Sacramento (Figure L.1-1). The County of Sacramento has designated much of the land in the Natomas Joint Vision Study Area, all of which is unincorporated, as Agricultural Cropland, with 17,864 acres (72 percent). This is followed by Public and Industrial designations with 3,509 acres (14 percent) and 2,013 acres (8 percent), respectively. Nearly 7,013 acres (28 percent) of the total study area is unused. Concepts for development include a mixture of residential densities, an industrial park (in addition to Metro Air Park), and open spaces throughout (most extensively in the northern extent separating development from the Sutter County boundary). A large amount of open space is anticipated for habitat preservation and farmland retention in this area. To date, no land use plans have been adopted, and all considerations to date have been conceptual. The Greenbriar Project is within the Natomas Joint Vision Plan study area (see above).

Approximately 5,400 acres within Natomas Basin would be affected by the development of the Natomas Joint Vision Plan.

PG&E Line 406/407 Pipeline Project

Pacific Gas and Electric Company (PG&E) is planning to construct the Line 406 and Line 407 Pipeline Project in Sacramento, Yolo, Sutter, and Placer Counties. This natural gas pipeline project includes a new 30-inch transmission pipeline approximately 40 miles long and a new Distribution Feeder Main (DFM). Line 407 would traverse the Natomas Basin along Baseline Road in southern Sutter County. The new DFM would extend from Line 407 south paralleling Powerline Road to the Sacramento Metro Air Park development. Approximately 4 acres within the Natomas Basin would be affected by this project.

SAFCA Natomas Levee Improvement Program Landside Improvement Project

The Sacramento Area Flood Control Agency (SAFCA) has proposed the Natomas Levee Improvement Program (NLIP) Landside Improvements Project. The project, which is proposed for construction in 2008 through 2010, includes levee raising and seepage remediation, improvements to irrigation and drainage infrastructure, habitat development, and additional actions to meet the Federal Emergency Management Agency (FEMA) requirements—encroachment management and bridge crossing modifications. All project construction activities would take place in Sacramento and Sutter Counties within the Natomas Basin. Approximately 1,500 acres within the Natomas Basin would be affected by this project.

Sacramento International Airport Master Plan

Sacramento County has proposed the Sacramento International Airport (SMF) Master Plan. The SMF Master Plan process began in May 2000 with the objective of developing a recommendation for phased airport development over a 20-year period. The Master Plan establishes a program for modifications of existing facilities and development of new facilities at SMF through the year 2020. The Master Plan addresses all aspects of the airport including the airfield, terminals and related passenger services, cargo, general aviation (GA), airport support, and airport access. One of the important features of the Master Plan is the proposed parking/rental car facility south of the airport at the end of the Airport

Boulevard Extension. The Sacramento International Airport Master Plan would affect approximately 313 acres.

Sacramento River Water Reliability Study

The U.S. Bureau of Reclamation, Placer County Water Agency, Sacramento Suburban Water District, City of Roseville, and the City of Sacramento initiated the Sacramento River Water Reliability Study (SRWRS) in 2002. To meet the water supply needs of the cost-sharing partners, the SRWRS identifies a package of water supply infrastructure components, including new or expanded diversions from the Sacramento, Feather, or American Rivers, and new or expanded water treatment and pumping facilities, storage tanks, and major transmission and distribution pipelines. Approximately 122 acres within the Natomas Basin would be affected by this project.

SMUD Power Line – Elkhorn Substation Capacity Expansion Project

The proposed Power Line-Elkhorn substation capacity expansion project would increase the footprint of the existing substation by approximately 0.5 acre (from approximately 0.62 acre to approximately 1.12 acres). An additional area located south of and adjacent to the existing substation would be required for the proposed project. The project would affect approximately 0.5 acres.

Cumulative Impacts

As per comments by and discussions with Jana Milliken, USFWS Fish and Wildlife Biologist, USFWS considers all the undeveloped land within the Natomas basin as habitat (excluding the permitted areas of the NBHCP, the MAPHCP, mitigation areas, and currently developed areas). As a result, for the purposes of this cumulative analysis, the amount of unused land that is within a project's limits and is proposed for development should be considered affected habitat. For example, the 577 acres of the Greenbriar Project proposed for development would also constitute 577 acres of lost habitat. On this basis, Table L1-1 shows the habitat acreage that would be affected by the 10 proposed projects within the un-permitted areas of the NBHCP.

GGG Upland Habitat

According to the Natomas Basin Conservancy's 2007 Implementation Annual Report, there was approximately 29,767 undeveloped acres remaining within the Natomas Basin (53,371 minus 15,608 acres within the NBHCP permitted areas, 1,892 acres for the MAPHCP, 4,145 acres for mitigation areas, and 1,959 acres of pre-NBHCP developed areas). Using USFWS' above impact interpretation, the amount of potential GGS habitat removed by the list of projects would be approximately 8,370 acres. If mitigated at a 1:1 ratio, a total of approximately 16,740 acres will be removed from the undeveloped area of the NBHCP. The area of GGS upland habitat affected by the bus/carpool lane project (0.55 acres) is small compared to the overall amount of undeveloped and agricultural land that would still be available within the Natomas Basin (approximately 13,000 acres). As described in Section 2.17.2.2 of the EIR/EA, the I-80 bus/carpool lane project's affects on GGS upland habitat at the WDC within the Natomas Basin will be compensated at a 3:1 replacement ratio, complying with the mitigation requirements set forth in the GGS Biological Opinion being prepared by USFWS. Replacement of the 0.55 acres will be through an in-lieu fee program with the USFWS. Based on the analysis presented, the proposed project would not cause a considerable incremental change to GGS habitat in the Natomas Basin.

Swainson's Hawk Foraging Habitat

Caltrans has determined that its bus/carpool lane project will not result in a substantial loss of Swainson's hawk foraging habitat. The area of vegetated shoulder that will be permanently removed is small, approximately 1.6 acres. This determination was made based on the small amount of land involved, the marginal quality of that habitat, its proximity to approved future development, and its classification as developed under the NBHCP. The loss of this marginal habitat will not cause a significant incremental impact to the hawks. In the Draft EIR/EA, the amount of affected right-of-way was calculated at approximately 7.0 acres. However, since then the design of the project has

undergone refinement, and the amount of disturbed area within the median and along the freeway shoulder has been reduced to 1.6 acres.

The Natomas Basin Habitat Conservation Plan (NBHCP) preserves substantial amounts of foraging habitat, which results in the addition of high-quality foraging habitat managed specifically to benefit the hawk (i.e., located in close proximity to nest trees, managed to produce most of hawk prey, available throughout the hawk's time in the Basin, etc.). Although Caltrans is not a signatory of the NBHCP, the I-80 bus/carpool lane project is located within the exempt area identified on Figure 2.1 of the Revised Natomas Basin HCP EIR/EIS, discussed in Section III of the Final Natomas Basin HCP, and identified on Exhibit B of the NBHCP Implementation Agreement. An exempt area is defined in the Agreement as areas within the Natomas Basin, within the City of Sacramento, which are already approved for development or already developed, and do not require mitigation. Since the I-80 right of way was designated as developed in these documents, it is reasonable to assume that the median and shoulders were not considered important Swainson's hawk foraging habitat in the NBHCP analysis.

I-80 is also included in Table 4-2 of the Revised Natomas Basin HCP EIR/EIS as part of the highway baseline acreage (1,435 acres) in the Natomas Basin baseline. Highways, which are exempt from the NBHCP because they are considered a developed land use, are described in Table 3-1 (Description of Land Use/Habitat Categories) as "Interstates 5 and 80, SR 99/70, and interchanges, including all areas within medians."

Currently, the undeveloped area adjacent to the proposed eastbound auxiliary lane between West El Camino and I-5 has been approved for construction of new homes (Beazer Homes), further decreasing the value of the remaining freeway shoulder as foraging habitat.

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2005. Sacramento River Water Reliability Study, Initial Alternatives Report. March.

US Fish and Wildlife Service, et al.

2002. Draft Environmental Impact Report/Environmental Impact Statement, Draft Natomas Basin Habitat Conservation Plan. August.

**Table L1-1
Future Projects Within the Natomas Basin and Outside the Permitted Areas of the NBHCP and MAPHCP**

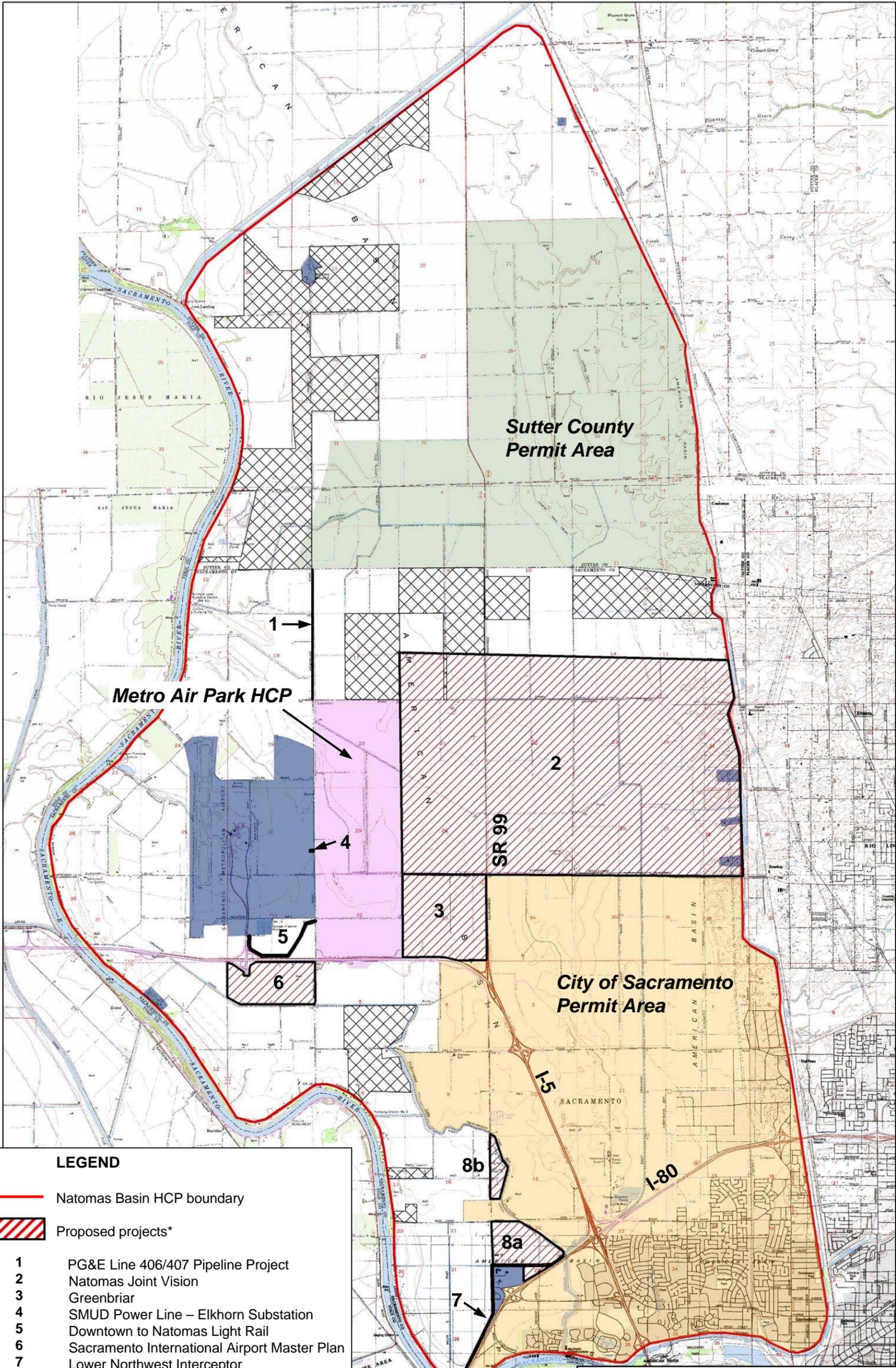
Project	Area of GGS Habitat Affected (Acres)*	Amount of Proposed GGS Mitigation (Acres)*	Area of Swainson's Hawk Foraging Habitat Affected (Acres)*	Amount of Proposed Swainson's Hawk Foraging Habitat Mitigation (Acres)*	Total Proposed Project Area (acres)	Data Source
Camino Norte - Leona Circle Project	Data unavailable	Data unavailable	Data unavailable	Data unavailable	390.00	Annexation Program Activity Report, City of Sacramento, March 2007
Downtown-Natomas-Airport Light Rail Line	9.10	9.10	9.10	9.10	16.00	Andrea Schmid, CH2MHill, July 2007.
Greenbriar	52.57	87.40	546.00	546.00	577.00	Greenbriar Development Project, Second Recirculated Draft Environmental Impact Report, EDAW, April 2007, pages 6-12-31 and 32
Lower Northwest Interceptor Project**	0.90	2.70	7.90	7.90	25.00	Lower Northwest Interceptor Project, Draft Environmental Impact Report, Sacramento Regional County Sanitation District, February 2003
Natomas Joint Vision Plan	Data unavailable	Data unavailable	Data unavailable	Data unavailable	5,423.00	Natomas Joint Vision website (http://cityofsacramento.org/planning/projects/natomas-joint-vision/)
PG&E Line 406/407 Pipeline Project	Data unavailable	Data unavailable	Data unavailable	Data unavailable	4.00	PG&E Natural Gas Line 406/407 NOP, Attachment 1, June 2007
SAFCA Natomas Levee Improvement Program Landside Improvement Project	560.00	510.00	690.00	1145.00	1,500.00	Draft Environmental Impact Report on the Natomas Levee Improvement Program Landside Improvements Project, EDAW, Sept. 2007
Sacramento International Airport Master Plan	0.00	0.00	142.50	83.25	313.00	Sacramento International Airport Master Plan Final EIR, Sacramento County, July 2007
Sacramento River Water Reliability Study	0.47	Data unavailable	Data unavailable	Data unavailable	122.00	Sharon McHale, Project Manager, US Bureau of Reclamation, November 2007
SMUD Powerline - Elkhorn Substation	0.00	0.00	0.50	0.50	0.50	Power Line-Elkhorn Substation Capacity Expansion Project Initial Study and Mitigated Negative Declaration, CH2MHill, February 2007
Total	623.04	609.20	1,396.00	1,791.75	8,370.50	

NOTES:

As per comments by and discussions with Jana Milliken, USFWS Fish and Wildlife Biologist, USFWS considers all the unused land within the Natomas basin as habitat (excluding the permitted areas of the NBHCP, the MAPHCP, mitigation areas, and currently developed areas). As a result, for the purposes of this cumulative analysis, the amount of unused land that is within a project limits and is proposed for development will also be considered affected habitat.

* As determined by the project proponent.

** The mitigation ratios proposed by the project proponent are between 1:1 to 3:1. The amounts in this table reflect the largest ratio.



LEGEND

-  Natomas Basin HCP boundary
-  Proposed projects*
- 1 PG&E Line 406/407 Pipeline Project
- 2 Natomas Joint Vision
- 3 Greenbriar
- 4 SMUD Power Line – Elkhorn Substation
- 5 Downtown to Natomas Light Rail
- 6 Sacramento International Airport Master Plan
- 7 Lower Northwest Interceptor
- 8 Camino Norte (8a) - Leona Circle (8b)
-  Mitigation areas (2006)
-  Developed areas prior to the implementation of the HCP

* Not shown: Sacramento River Water Reliability Study, SAFCA Natomas Levee Improvement Program Landside Improvement Project

FIGURE L1-1
Location of Proposed Projects

03-Sac-80
Median Lanes and Auxiliary Lanes Project
KP M0.00 / M16.25 (PM M0.00 / M10.10)
EA 03-37970

State of California
Department of Transportation



Response L1e

Please refer to Response L1d.

Response L2

Caltrans welcomes working with City officials regarding this project. This project will not cause an adverse/negative impact noise to adjacent residences because the increase in noise levels is predicted to be 2 to 3 decibels. None of the proposed sound walls have been eliminated due to reasonability (cost) analysis. Unless a developer's environmental document was approved before this project, they are responsible for addressing noise abatement for their future development. Please refer to Section 2.13 regarding determination of significance.

The entire project adhered to the FHWA noise protocol. Sound walls that met the reasonability and feasibility criteria have been recommended on various locations throughout the project limit. Please refer to Section 2.13 for the location of proposed sound walls.

Response L3a

Under CEQA, an EIR is not required to consider every conceivable alternative to a project; rather, only the alternatives that meet the project objectives (purpose and need), are feasible, and avoid or substantially reduce at least one of the significant environmental effects (CEQA Guidelines, Sec. 15126.6(f)). CEQA also notes that alternatives may be eliminated from detailed consideration in an EIR if they fail to meet most of the basic project objectives and are infeasible (CEQA Guidelines 15126.6(c)). Caltrans considered a range of alternatives, including general purpose lanes, HOT lanes and take-a-lane, that were dropped because they were not feasible and did not meet basic project objectives. Please refer to Section 1.5.2.

NEPA does not require that all possible alternatives be considered, rather that reasonable range of alternatives be presented. NEPA requires that an agency consider "reasonable" alternatives which accomplish the agency's objectives, i.e. satisfy the criteria set forth in the statement of purpose and need. Alternative 1 met the project's purpose and need, was feasible, and avoided significant environmental effects.

Please refer to Responses L3b and L3c.

Response L3b

The Metropolitan Transportation Plan (MTP) includes projects to improve all modes of travel. Caltrans supports regional rail and other transit improvements. The I-80 Across the Top bus/carpool lane project was specifically programmed in the MTP to address improvements to the State highway system that would reduce congestion and encourage more people to travel together in carpools and buses as alternatives to single occupancy vehicles. Please refer to Responses L3a and L4o.

Response L3c

A truck only toll lane was not considered as a viable project alternative because the cost/benefit ratio of the project would not be high enough. Truck only lanes are most effective when most trucks are traveling significant distance through a region without stopping. SACOG 2007 Goods Movement Study concludes that most trucks stop at least once in the area and previous studies by Caltrans have shown that separate truck lanes for shorter distances decrease safety and increase merging problems in an urban area such as this segment of the I-80 corridor. As part of the goals of the 2006 MTP (#5, Economic Vitality), carpool lanes on the freeways will help clear up congestion that slows down trucks.

This option does not meet the project's purpose and need (promote the use of high occupancy vehicles, provide greater connectivity with the existing and proposed bus/carpool network in the Sacramento region, and help achieve the goals of the SACOG 2006 Metropolitan Transportation Plan).

Response L3d

As noted on the first page of Appendix A, supporting documentation of all CEQA checklist determinations (potentially significant, less than significant with mitigation, less than significant, and no impact) was provided in Chapter 2 of this Environmental Impact Report/Environmental Assessment. Discussion of all impacts, avoidance, minimization, and/or mitigation measures was under the appropriate topic headings in Chapter 2.

Chapter 3 of the EIR/EA includes a discussion of determining significance under CEQA and a discussion of significant impacts. The analysis in the Final EIR supports the conclusion that the project would not have unavoidable significant environmental impacts. No mitigation is required.

Response L3e

The phenomenon where additional capacity leads to additional demand for travel is known as "induced travel." Induced travel occurs when the cost of travel is reduced (i.e., travel time reduction due to additional capacity) causing an increase in demand (more travelers using the improved facility). The reduction in travel time causes various responses by travelers including diversion from other routes, changes in destinations, changes in mode, departure time shifts, and possibly the creation of new trips all together. As noted on page 21 the traffic report, the actual traffic volumes under design-year conditions may be higher than forecasted due to induced demand. However, the amount of induced traffic during peak periods will be limited by congested conditions, which are predicted to occur under both no build and build conditions.

Response L3f

For the purpose of determining roadway capacity, the percentage of trucks was assumed to remain constant. That is, truck traffic is assumed to grow at the same rate as all traffic. In practice, truck operators avoid peak periods to minimize travel time. As a result, the growth rate for peak-period truck volumes for the build alternative would likely be less than the peak-period growth rate for all vehicles.

Response L3g

The proposed project will likely result in increased regional VMT through induced travel, as discussed in the traffic study. The traffic forecasts were developed using the state-of-the-practice models that include some of the causes of induced travel: changing route to use the additional capacity and changing mode (for example, driving alone to carpooling). Other causes of induced travel such as changing travel time from off-peak to peak periods or land uses changes (for example, from residential to commercial) are not accounted for. As a result, the effect of these changes is unknown.

Response L3h

The increases in traffic volume served during the peak period under the project alternatives are listed in Table 2.5-1 of the EIR/EA. These traffic volumes are the basis for the air quality and noise analysis in the EIR/EA.

Response L3i

The prime contributor of particulate matter (PM) are heavy duty trucks. The bus/carpool lane is designated for buses and vehicles with 2 or more persons. Heavy duty trucks will not use the carpool lanes. The PM₁₀ section within the Air Quality Analysis Report, p.11 should have read "the project's build alternatives will not increase diesel vehicle miles of travel (DVMT)." This has been corrected in the EIR/EA. The project was included in the MTP and MTIP by SACOG and is in conformance with the SIP. Before adopting the MTP and MTIP, SACOG performed a quantitative analysis to determine if implementation of the set of projects would result in violations of the ozone and PM₁₀ air quality standards. Based on this analysis, SACOG concluded that implementation of this set of projects would not result in violation of the ozone and PM₁₀ standards. Furthermore, under 40 CFR 93.123(b)(1)(i) and (ii), projects that are not an air quality concern for PM₁₀ and PM_{2.5} include "any new or expanded highway project that primarily services gasoline vehicle traffic (i.e., does not involve a significant number or increase in the number of diesel vehicles)." The capacity change with the bus/carpool lane

will have little effect on diesel truck traffic, which is the primary source of PM_{2.5} and toxic air contaminants from a typical freeway. Please refer to the Air Quality Study regarding PM_{2.5} analysis.

On May 24, 2007, Caltrans met with the SACOG Working Group and the Inter-agency Consultation process to determine if the I-80 Bus/Carpool Lane Project is a Project of Air Quality Concern for PM₁₀. In June 2007, as part of the EPA required PM₁₀ analysis process, this project was found to be “not a project of air quality concern” for PM₁₀ through the Interagency Consultation Process by the Regional Planning Partnership of the Sacramento Area.

Like PM₁₀, PM_{2.5} is primarily attributed to diesel vehicle emissions. For this reason, as stated above PM_{2.5} is not of air quality concern for this project.

Response L3j

Please refer to Response L3i. The same conditions that create PM₁₀ also create PM_{2.5}. Please refer to Section 2.12 of this document and the Executive Summary, Section 3, and Section 6 of the Air Quality Study.

Response L3k

A relevant decrease in travel times could encourage commuters to accept a longer commute and cause population shifts further out from employment centers. However, the analysis shows that the level of increased capacity and potential improvement in the level of service does not offer the type of commute reduction times that would likely cause new unplanned growth. Growth in Sacramento County and western Placer County has been occurring at such rapid rates that the build alternative, providing the last 10-mile leg of an HOV system that spans Sacramento and Placer Counties, is a negligible factor as far as spurring unplanned growth. Section 2.2 of the EIR/EA provides a growth inducement analysis.

The project does not include new right of way acquisition or new access points (interchanges).

Response L3l

Please refer to Response L3k. Further discussion of current and future land use and planning along the I-80 corridor is in Section 2.1 of the EIR/EA. Section 2.1 also discusses jobs/housing balance and commuting patterns. Section 2.2 discusses growth inducement.

Response L3m

Your request for a project-level greenhouse gas emissions analysis is acknowledged. At this time, however, regulatory agencies with jurisdiction over the issue such as the United States Environmental Protection Agency (USEPA) and the California Air Resources Board (CARB) have not provided any guidance on how to conduct a project-level analysis of greenhouse gas emissions.

One of the primary purposes of the project is to promote the use of high occupancy vehicles, such as carpools, vanpools, and transit. Projects such as these are an integral component of Caltrans' efforts to reduce greenhouse gas emissions by reducing, managing, and eliminating vehicle trips. As discussed in Section 2.5.1, transit ridership is anticipated to increase as a result of the project. Similar effects are anticipated with respect to carpools and vanpools. To the extent that the project successfully meets the purpose of promoting high occupancy use, the project would result in a decrease of carbon dioxide emissions over the no build alternative.

Caltrans shares your concern regarding greenhouse gas emissions and climate change and will continue to work proactively as members of the statewide Climate Action Team to address this important issue. Please refer to Section 3.3 regarding climate change and greenhouse gas emissions.

Please refer to Section 2.5, 2.2, and 2.1 for information regarding traffic, growth, and land use.

Please refer to L4t.

Response L3n

When balancing energy used during construction and operation against energy saved by relieving congestion and other transportation efficiencies, the project would not have substantial energy impacts. Please refer to Response L4f and Section 2.14.

Response L3o

Safety impacts were discussed in the EIR/EA in Section 2.5 (Traffic and Transportation).

Response L4a

This bus/carpool lane project is within the Sacramento Area Council of Government's Regional Blueprint. Caltrans considers the I-80 Bus/Carpool Lane project to be one project within an interdependent multimodal transportation system that includes a regional bus/carpool network, regional passenger rail service, light rail service, express bus/local bus service, bicycle routes, pedestrian facilities, local roads, goods movement corridors, and air service. Caltrans hopes that land use decisions consistent with the Regional Blueprint will encourage more short trips and fewer interregional commute trips. However, the bus/carpool lane project is a response to existing congestion resulting from prior land use decisions. Heavy congestion motivates many people to divert to surface streets, so less congestion on the freeway will decrease cut through traffic on local streets with bicycle routes.

Response L4b

Information regarding the Downtown-Natomas-Airport light rail line has been added to the EIR/EA.

Response L4c

One of the main purposes of the project, as described in Section 1.3 of the EIR/EA, is to "promote the use of high occupancy vehicles, such as carpools, van pools and transit." Adding a bus/carpool lane in both the eastbound and westbound directions allows transit, including express commute buses and vans, to utilize these lanes during the AM and PM peak commute periods. Non-express buses, such as interregional buses (Greyhound) and specific-use buses (i.e., gambling), would benefit from the increase in capacity and time-savings.

Although Regional Transit (RT) does not currently operate buses on I-80 from Watt Avenue to West El Camino, RT does consider the proposed bus/carpool lanes a desirable alternative for bus service operation should light rail service be interrupted or become overcrowded. Please refer to Section 2.5.1 of the EIR/EA.

Roseville Transit currently uses I-80 from Roseville to the Capital City Freeway for the route to downtown Sacramento. Roseville Transit has indicated that they would use carpool lanes beyond this point along I-80 (to and from downtown Sacramento) for all commuter runs if travel time to the downtown area is reduced by using the new carpool lanes. This information has been added to the EIR/EA.

At the present time, approximately ten different agencies provide express bus service in the Sacramento area and have proven very effective at attracting choice riders. Roseville Transit and Placer County Transit are two examples of agencies currently providing service in the I-80 Corridor. As development occurs in the McClellan and South Placer areas designated in the Blueprint for higher density, rubber tired transit will become even more important than it is today. Express buses compliment light rail and expansion of both services will be critical if more jobs are added in Central Sacramento. Paratransit services also benefit from shorter and more predictable travel times.

Response L4d

Placer Commuter Express currently runs three morning commuter buses to and three afternoon commuter buses from downtown Sacramento every workday. These buses use I-80 to I-5, and then

continue to downtown Sacramento. This information has been added to the EIR/EA. Please refer to Response L4c.

Response L4e

Please refer to Responses L4c and L4d.

Response L4f

The proposed project seeks to increase the share of carpools and buses by providing a travel time advantage to these modes of travel. Carpools and buses have less environmental impacts than driving alone.

Bus/carpool lanes are efficient transportation system components. Less energy is consumed per person transported in multi-occupant vehicles as compared to single occupant vehicles. Additionally, I-80 bus/carpool lanes are intended to serve carpools, buses including express commuter buses, Paratransit, and vanpools. The bus/carpool lanes will provide shorter, more predictable travel times for commuters traveling together, making trips in single occupant vehicles less attractive. Even under the densest SACOG Blueprint scenarios, automobiles remain the dominant mode, so it is important to encourage more efficient use of them by providing an incentive for people to travel together.

Response L4g

I-80 serves regional and interregional travel, and the automobile is the primary mode for travel. Therefore, the proposed project would fulfill the need for congestion reduction on the regional and interregional transportation system. Please refer to Response L4f.

Response L4h

The existing carpool lane to the east of the proposed project provides travel time advantage for carpools. The proposed project would increase this travel time advantage for existing carpools. Over time, more carpools will form to take advantage of the travel time savings. On Highway 99, the percentage of carpools in the overall traffic flow during the peak hour has increased from 17% in 1989 to 32% in 2004. A similar growth in carpools is expected for I-80. The existing carpool lane on Highway 99 carries as many vehicles during the commute period as other lanes of traffic. Under design-year conditions, I-80 is expected to have a similar percentage of carpool vehicles as Highway 99. Please refer to Response L4c.

Response L4i

The formation of carpools is accounted for in the traffic volume forecasts. Compared to a general purpose lanes addition, the travel demand for the carpool lanes are lower due to carpool formation. However, the lane addition has a greater effect on congestion reduction than the drop in travel demand due to carpool formation. Please refer to Response L4c.

Response L4j

Congestion on I-80 is expected to be significant under design-year conditions. The travel time advantage for carpools is likely to be significant: 55 to 65 mph for the carpool lane compared to 15 to 25 mph for the general purpose lanes. Please refer to Response L4c.

Response L4k

The effect of carpool formation is included in the traffic volume forecasts. The SACMET regional travel demand forecasting model includes a module that computes the number of carpools formed based on the travel time advantage. Although the "take a lane" alternative would likely result in greater carpool formation, this alternative would likely have significant traffic impacts on other roadways since both regional and local traffic would seek other less-congested routes first before forming carpools.

Caltrans prepares an annual report documenting use of the bus/carpool network (the latest report is for 2006). As detailed in Section 2.5 of the EIR/EA, bus/carpool lanes in the Sacramento Region are successful, in terms of time savings and number of people moved versus general purpose lanes.

Response L4l

Please refer to Response L3a.

Response L4m

Please refer to Response L3a. Other alternatives, including general purpose lanes, HOT lanes and take-a-lane, were analyzed in the 2006 traffic study for the project and are included in Section 1.5.2, Alternatives Considered But Dropped.

Response L4n

Please refer to Responses L3a, L3b and L3c. Alternative 1 meets the purpose and need of the project.

Response L4o

The full citation on page 27 of the EIR/EA is the following: "Similarly, the project would not contribute to any cumulative growth inducement impacts with regard to the existing and planned bus/carpool lanes or the other transportation projects listed in Table 2.18-1." This statement is qualified by the previous paragraph; "The project would not create excessive new capacity that would induce new, unplanned growth. According to the traffic report, implementation of the preferred alternative would increase the LOS on I-80 to "E" by the year 2014, where traffic operations are still at or near capacity and flow is unstable, and by 2024 the LOS is expected to fall back to F. Further, the design of the project does not create any new access points or alter current ramp locations. Finally, the project would not remove any key restraints to growth—it would not change any land use designations or open any new areas to development."

There will always be a contention as to whether transportation projects stimulate growth or just are constructed in response to growth that is already occurring. The proposed build alternative does not suggest a future level of service increase (per the traffic study) that would promote accelerated or new growth patterns.

Please refer to Response L3k.

Response L4p

Comment noted.

Response L4q

This project is contained within existing State right of way and will not result in the widening of any interchanges. The project will not affect the point where the on ramps and off ramps meet a local street. With reduced freeway congestion, many trips will be diverted to the freeway from local streets with bicycle lanes. Safety impacts to bicyclists or pedestrians are not anticipated.

Response L4r

Please refer to Response L4a.

Response L4s

As described in Section 2.5.2, the City of Sacramento is proposing a new pedestrian overcrossing (POC) between West El Camino Avenue and I-5. Caltrans will work with the City to assure that the bus/carpool project will not affect the new POC.

This project's work is contained within existing Caltrans right of way and will not result in the widening of any interchanges or impacts to bicyclists or pedestrians.

Response L4t

Climate change is a global problem. The difficulty is trying to address a global problem at a project-level scale, especially without technical guidance from regulatory agencies with expertise, such as USEPA and CARB. At this time, the best analysis available is a qualitative assessment.

One of the primary purposes of the project is to promote the use of high occupancy vehicles, such as carpools, vanpools, and transit. Projects such as this are an integral component of Caltrans' efforts to reduce greenhouse gas emissions by reducing, managing, and eliminating vehicle trips. As discussed in Section 2.5.1, transit ridership is anticipated to increase as a result of the project. Implementation of bus/carpool lanes on I-80 would allow buses to bypass congested general purpose traffic lanes and would reduce the number of vehicle trips on I-80 when compared to the no build. Similar effects are anticipated with respect to carpools and vanpools. To the extent that the project successfully meets the purpose of promoting high occupancy use, the project would result in a decrease of carbon dioxide emissions over the no build alternative.

Please refer to Response L3m.

Response L4u

The increases in traffic volume served during the peak period under the project alternatives are listed in Table 2.5-1 of the EIR/EA.

Response L4v

The EIR/EA contained only a brief summary of all the strategies Caltrans is taking to reduce greenhouse gas emissions. Caltrans' Climate Action Program found on the internet at www.dot.ca.gov/docs/ClimateReport.pdf contains detailed discussions on all Caltrans strategies to reduce greenhouse gas emissions, included as part of the discussions are the greening of Caltrans' fleet and strategic partnerships with state, regional and local stakeholders.

Response L4w

Please refer to Response L4v.

Response L4x

Please refer to Response L3g.

Response L4y

The comment states that a grid locked freeway would "be the same as no access at all" to developments in suburban areas. The experience of other metropolitan areas, such as the Bay Area, indicates that freeway congestion is not a very effective means of limiting suburban or exurban development. In the Bay Area, both vehicle miles traveled and vehicle hours of delay have increased. While the freeways are congested, suburban communities have continued to be attractive to commuters seeking affordable housing. Also, please refer to Response L3n.

Response L4z

Please refer to Response E3a.

Response L4aa

Please refer to Response L3i and Section 2.12.2.3 of the EIR/EA.

Response L4bb

The proposed project does not permanently affect any bike paths or routes, nor does it permanently affect pedestrians; cumulative impacts to bicyclists and pedestrians are not anticipated.

Response L4cc

The project adheres to the FHWA noise protocol. Sound walls that met the reasonability and feasibility criteria have been recommended on various locations throughout the project limit. Please refer to Section 2.13 for the location of proposed sound walls.

Response L4dd

Placer County and Roseville are discussed in the EIR/EA as employment centers and areas of where growth is occurring at a rapidly pace. Analysis of possible cumulative impacts from projects further out in Yuba, Placer, and Sutter Counties would be relevant if there was indication that the proposed build alternative would cause a future level of service increase (per the traffic study) that would promote accelerated or new growth patterns in outlying areas. The traffic information provided in the EIR/EA does not support this conclusion.

Response L4ee

The EIR/EA analyzed potential air quality, noise, hydrology, water quality and storm water impacts, and concluded that the project did not pose significant impacts to these resources. The EIR/EA also included various minimizations and avoidance measures to reduce environmental impacts. Please see Appendix A and E of the EIR/EA.

Response L4ff

Please refer to Response L3i.

Response L4gg

In Section 2.4 of the EIR/EA, it states that the schools listed are located within the study area. The study area was defined in the Community Impact Assessment as consisting of twelve (12) Year 2000 US Census Tracts that border the project limits along the corridor. These Census Tracts spanned an approximate 2-mile area on the north and south sides of the corridor.

There were air receptors modeled near school sites. The results indicate that the freeway emission has no significant impact to school sites. However, air emissions at schools are closely related to automobiles arriving and parking at the school and parents dropping off and picking up non-driving students. Those emissions are not related to the freeway.

Response L4hh

The California Air Resources Board (CARB) does not require health risk assessment for land uses near freeways. The Land Use Handbook (<http://www.arb.ca.gov/ch/landuse.htm>), which suggests strongly that sensitive land uses not be located within 500 feet of a freeway, is guidance, not regulation.

Caltrans performed a mobile source air toxics (MSATs) analysis using the MSATs spreadsheet developed by the University of California, Davis (http://aqp.engr.ucdavis.edu/Documents/UCD_MSAT_Report_12_28_2006.pdf). The method utilizes CARB's EMFAC2007 on-road emissions model, related MSATs data provided by CARB, and activity data provided by the project analyst. The results of the analysis are detailed below:

Summary of Project Level DPM and MSAT Emissions (grams/day)

	Diesel PM	Benzene	1,3-Butadiene	Acetaldehyde	Acrolein	Formaldehyde
Base Year (Existing)	13627	9450	1940	3088	440	9162
Operational Year (No-Build)	7484	4862	909	1469	207	4407
Operational Year (Build)	7700	5106	958	1528	219	4602
RTP Horizon Year (No-Build)	3087	2337	395	547	93	1809
RTP Horizon Year (Build)	3283	2585	441	588	104	1975

Since I-80 is a major diesel truck route, the build alternative shows a slightly higher MSATs emission than the no build alternative. But, compared to the existing year, the amount of MSATs emission reduction for the build alternative in the operational year (2014) and the RTP horizon year (2034) will be between 41 to 81 percent because of USEPA's regulations that will dramatically decrease MSATs through cleaner fuels and cleaner engines. According to an FHWA analysis, even if VMT increases by 64 percent, reductions of 57 percent to 87 percent in MSATs are projected from 2000 to 2020 (fhwa.dot.gov/environment/airtoxic/vmtmsat2020.htm).

Response L4ii

As described in Section 2.6 of the EIR/EA, several measures are proposed regarding vegetation, depending on available funding.

Response L4jj

It is Caltrans District 3 traffic policy to end the micro simulation model studies at ramp termini. The traffic study analyzed the freeway mainline and ramp junctions, but not the adjacent local streets. There are no significant parallel local street routes along this section of I-80. The proposed project, by improving the freeway's person-moving capacity, is expected to help divert vehicles from local streets. Providing additional capacity on the freeway would lessen the likelihood of congestion on local streets. As such, it is not likely to worsen air quality on the surrounding surface streets.

Response L4kk

Parking demand is not typically studied as part of a roadway infrastructure project. Parking demand is related to land uses. Proposed land development projects are required to address parking supply and related impacts.

Response L5a

Caltrans has not adopted SMAQMD's CEQA threshold of significance for ROG and NOx. Caltrans calculated NOx and ROG emissions for SACOG as part of its application for Congestion Mitigation and Air Quality (CMAQ) Improvement Program funding. The California Air Resources Board supplied the calculation methodology. The calculations showed total reductions of 136.7 pounds (62,029 grams) per day of NOx and 147.4 pounds (66,870 grams) per day of ROG with the project.

Response L5b

As stated in the EIR/EA, contractors will be required to comply with all pertinent rules, regulations, ordinances, and statutes. On July 25, 2007, the California Air Resources Board adopted a regulation reducing diesel emissions from off-road construction vehicles. Contractors will be required to follow this regulation. Reductions in construction equipment emissions are anticipated as a result of this regulation.

Response L5c

As stated in the EIR/EA, the contractor is required to comply with all pertinent rules, regulations, ordinances, and statutes of the SMAQMD. Caltrans supports SMAQMD's efforts to pass rules regarding construction emissions, which would apply equally to all contractors. SMAQMD had proposed two tentative rules regarding construction emissions: Rule 1052, Construction Mitigation and Rule 1025, Construction Equipment Fleet. As stated on SMAQMD's website, Rule 1052 is tentatively proposed to be adopted or amended in 2007; the current status of Rule 1025 is unknown. Also, please refer to Caltrans Standard Specification section 7-1.01, Air Pollution Control (www.dot.ca.gov/hq/esc/oe/).

On July 25, 2007, the California Air Resources Board adopted a regulation reducing diesel emissions from off-road construction vehicles. Contractors will be required to follow this regulation.