



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

April 26, 2006

Gene Fong
Division Administrator
Federal Highway Administration
650 Capitol Mall Suite 4-100
Sacramento, CA 95814

Subject: Draft Environmental Impact Statement/Environmental Impact Report for the
Interstate-5/Cosumnes River Boulevard Extension, Sacramento County,
California (CEQ # 20060069)

Dear Mr. Fong:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508) and Section 309 of the Clean Air Act.

Based on our review, we have rated the Draft Environmental Impact Statement (DEIS) for the proposed project as Lack of Objections (LO). Please see the attached "Summary of EPA Ratings." We encourage the Federal Highway Administration (FHWA) to avoid and minimize potential adverse impacts, to the greatest extent practicable, to sensitive environmental, farmland, community, and cultural resources. In addition, we have several comments on Section 3.14 (Air Quality) that we recommend FHWA address in the Final EIS (FEIS).

- Section 3.14.2 of the DEIS states that the Sacramento area is violating the National Ambient Air Quality Standard (NAAQS) for particulate matter less than 2.5 microns in diameter (PM_{2.5}) (p. 1-116 and Table 3.14-2). However, EPA views the Sacramento area as attainment for the PM_{2.5} federal standard based on our review of data from the last three years and application of our 98 percentile criteria. We recommend that the FEIS clarify the basis for the PM_{2.5} violation criteria and attainment status of the Sacramento area for PM_{2.5}. Also, the FEIS should be updated to include PM 2.5 monitoring results for annual concentrations (Table 3.14-2).
- Section 3.14.2 discusses the Clean Air Act requirement that each state develop a State Implementation Plan (SIP) for non-attainment areas. However, SIPs are also required for maintenance areas. Sacramento is a maintenance area for carbon monoxide (CO). The FEIS should state whether a SIP exists for each non-attainment or maintenance area designation in the Sacramento area and if EPA has approved that plan.

- The discussion of transportation conformity (p. 118-119) should be updated to reflect the recent update of the Sacramento Area Metropolitan Transportation Improvement Project and Metropolitan Transportation Plan, if FHWA has approved that document. It should state whether the proposed project is included in the update. It should also note whether the areas' conformity analysis includes a regional emissions analysis for ozone, CO and PM10, all required for conformity. Finally, the FEIS should be updated to reflect the status of EPA's adequacy determination for the 8-hour ozone standard.
- The DEIS does not include a qualitative hotspot analysis for PM10. We recognize that the regulations governing hotspot analysis particulate matter have recently changed. Given the relatively recent implementation of this regulation, however, we recommend that the FEIS briefly discuss this change and the impacts on the analysis.
- The air quality section indicates that diesel exhaust over a two-year construction period would not present health concerns. However, exposure to diesel exhaust, even if not prolonged, can have adverse health effects. Exposure to diesel exhaust may contribute to respiratory irritation and lung damage. Diesel exhaust is classified by EPA as a "likely" human carcinogen at environmental exposure levels. A high dose of carcinogen received over a short time period can be equivalent to a correspondingly low dose spread over a lifetime (Guidelines for Carcinogenic Risk Assessment, U.S. EPA, 1986). We recommend that the FEIS clarify the potential for adverse health effects from short-term as well as cumulative exposures to diesel exhaust.

EPA appreciates the opportunity to review this DEIS. When the FEIS is released for public review, please send two copies to the address above (mail code: CED-2). If you have questions, please contact me at 415-972-3988 or Nancy Levin, the lead reviewer for this project. Nancy can be reached at 415-972-3848 or levin.nancy@epa.gov.

Sincerely,

/S/ Connell Dunning for
Duane James, Manager
Environmental Review Office
Communities and Ecosystems Division

Enclosure:
Summary of EPA Rating Definitions

cc: John Webb, Caltrans North Region
Grace Hovey, City of Sacramento