



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

March 1, 2006

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

Subject: Draft Environmental Impact Statement (EIS) for Doyle Drive Project – South
Access to the Golden Gate Bridge, San Francisco, CA (CEQ #20050545)

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 proposed project as Environmental Concerns-Insufficient Information (EC-2).

We recognize the importance of addressing the seismic, safety, and structural improvement needs for Doyle Drive and commend the Federal Highway Administration (FHWA) on a well-prepared Draft Environmental Impact Statement (EIS). Given the project's location within the Presidio and its proximity to the Golden Gate National Recreation Area, cultural institutions, and residential areas, we are concerned about potential adverse impacts to cultural and historic resources and traffic in neighboring communities. We are also concerned about potential human health impacts from construction-related emissions. We recommend that FHWA avoid and minimize these impacts to the maximum extent possible, and commit to specific mitigation measures in the Final EIS and Record of Decision. Please see the enclosed detailed comments.

EPA appreciates the opportunity to review this Draft EIS. When the Final EIS 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

Enclosures:

Summary of EPA Rating Definitions

Detailed Comments

cc: Leroy. L. Saage, San Francisco County Transportation Authority
 Jared D. Goldfine, Caltrans
 Brian O'Neil, National Park Service
 Craig Middleton, The Presidio Trust
 James Metcalf, U.S. Department of Veterans Affairs

**EPA DETAILED COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR
DOYLE DRIVE PROJECT – SOUTH ACCESS TO THE GOLDEN GATE BRIDGE, SAN
FRANCISCO COUNTY, CA, MARCH 1, 2006**

Cultural and Historic Resources

The proposed project extends from the south end of the Golden Gate Bridge in San Francisco, through the Presidio of San Francisco, to the Palace of Fine Arts. This area is rich in historic and cultural significance. The Presidio is designated as a National Historic Landmark District (NHL). As stated in the Draft Environmental Impact Statement (EIS), both build alternatives would have an adverse effect on the Presidio NHL and its contributing elements, individual historic properties, and the cultural landscape found on the Presidio (pages 3-113 to 3-116). Other historic properties in the area include a prehistoric archaeological site, historic viaducts, the Golden Gate Bridge, and the Palace of Fine Arts. According to the Draft EIS, the Federal Highway Administration (FHWA) has begun consultation under Section 106 of the National Historic Preservation Act (page 3-107). The Draft EIS states that a Memorandum of Agreement (MOA) and a variety of mitigation plans will be developed as part of the Section 106 consultation process (pages 3-116 to 3-120).

Recommendations:

Given the magnitude of potential impacts to cultural and historic resources, we recommend that the Final EIS include a more detailed discussion of mitigation measures and design guidelines to avoid, minimize and compensate for adverse impacts. We recommend that these measures be adopted in the Record of Decision (ROD).

Include in the Final EIS the completed Section 106 MOA and mitigation plans. Alternatively, discuss the process and timeline for completing the Section 106 consultation process.

Traffic and Transportation Impacts

The Draft EIS recognizes that the project could adversely affect traffic patterns on local roadways during construction and operation. Project construction will require short-and long-term roadway closures (page 2-61) that could increase traffic in some areas, reduce travel speeds, and divert traffic through neighborhood streets. New or modified access points may also affect pedestrian and bicycle operations.

The Draft EIS briefly discusses strategies to accommodate traffic during construction (page 3-68), and states that a “Transportation Management Plan” will be developed to minimize these traffic impacts. The Transportation Management plan will encourage use of alternative routes, use of transit, overall trip reduction, and interactive traffic monitoring to alleviate bottlenecks (page 3-90). The Draft EIS also states that the Transportation Management Plan will not be developed until after the preferred alternative is selected and during the final design, and that affected agencies would be consulted to develop the Plan (page 3-65).

Recommendations:

Include in the Final EIS a draft Transportation Management Plan with specific measures to minimize adverse traffic impacts to neighborhoods as a result of the construction and operation of the proposed project.

Include in the Final EIS specific measures to encourage the use of transit as a means of alleviating construction-related congestion.

In addition to soliciting transportation and transit agency feedback on the Transportation Management Plan, include in the Final EIS a commitment to consult with local residents, businesses, and other affected users (including bicyclists and pedestrians) of the Presidio and Golden Gate National Recreation Area in developing the Plan.

Construction-related Emissions

We commend FHWA for describing available dust control measures in the Draft EIS and encourage FHWA to commit to these measures in the Final EIS and ROD.

Construction emissions from the proposed project may result in human exposure to diesel exhaust, which includes particulate matter less than 2.5 microns in diameter (PM_{2.5}). Older adults, people with heart and lung disease, and children are particularly sensitive to fine particle exposure. Studies have shown a significant association between exposure to PM_{2.5} and adverse health outcomes, including asthma, respiratory disease, and premature death. Given the adverse health effects for PM_{2.5} and diesel exhaust exposure, EPA recommends that the Final EIS include mitigation measures for these construction emissions.

The project's Air Quality Study (November 2004) identifies residential areas in and around the project study area that would be sensitive to air quality impacts of the project. The Final EIS should also specify the locations of schools, hospitals, open space/recreational areas (in addition to Crissy Field), and convalescent homes, if any, that could be affected by construction-related emissions.

Recommendations:

Identify in the Final EIS sensitive receptors in the project area, including children, elderly, infirm, and athletes, and minimize impacts to these populations.

Include a Construction Emissions Mitigation Plan for fugitive dust and diesel PM (DPM) in the Final EIS and adopt this plan in the ROD. EPA recommends the following mitigation measures be incorporated in the Construction Emissions Mitigation Plan, where feasible and appropriate, in order to reduce impacts associated with emissions of PM₁₀, DPM, and air toxics from construction-related activities:

- Establish an activity schedule designed to minimize traffic congestion around the construction site.
- Utilize EPA-registered particulate traps and other appropriate controls to reduce emissions of diesel particulate matter and other pollutants at the construction site.
- Locate construction equipment and staging zones away from sensitive receptors such as children and the elderly as well as away from fresh air intakes to buildings and air conditioners.
- Use low sulfur fuel (diesel with 15 parts per million or less).
- Reduce trips and unnecessary idling from heavy equipment.
- Lease newer and cleaner equipment (1996 or newer).
- Periodically inspect construction sites to ensure construction equipment is properly maintained at all times.

Other Comments

- Section 3.3.4 Air Quality references the 2001 Transportation Improvement Program (TIP). Since the project is identified in the Draft EIS as being part of a conforming 2005 TIP, it is unclear why the 2001 TIP is referenced (page 3-161). This should be clarified or updated in the Final EIS.
- The project impact summary tables (Exhibits S-7 and S-8) include only permanent impacts of the project to the human and physical environment. We recommend that the summary table also include temporary impacts, so that the tables provide a complete summary of potential project effects.
- In accordance with Executive Order 13112, EPA recommends that the Final EIS identify proposed methods to minimize the spread of invasive species and utilize native plant and tree species where re-vegetation is planned.