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Via Email

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Masum A. Patwary
Environmental Scientist C
California Department of Transportation, District 3
703 B Street
Marysville, CA 95901

Dear Dr. Patwary:

This letter provides comments on the Yolo 80 Draft Environmental Impact Report (DEIR) on behalf of the Environmental Council of Sacramento (ECOS), of which I chair its Climate Committee. I also serve on the board of Breathe California-Sacramento Region. I have graduate degrees in chemistry and environmental health. I am a retired chemistry professor, having taught at UC Davis. I am also a retired Air Pollution Research Specialist from the California Air Resources Board (CARB), where I managed research conducted by the University of California on health effects of near-road air pollutants. This includes a 2017 UCLA study ([Effectiveness of Sound Wall-Vegetation Combination Barriers as Near-Roadway Pollutant Mitigation Strategies](#)) that concluded “Traffic-related air pollutants are a significant public health concern near freeways.”

Stephen Wheeler is correct in his January 8, 2024 letter on behalf of Sierra Club’s Yolano Group, where he stated that while “California is making progress in many sectors towards reducing its GHG emissions, transportation is one area in which it is not.” This is due to increased vehicle-miles traveled (VMT), which the alternatives presented in the DEIR would further exacerbate.

The DEIR fails to consider reasonably feasible alternatives which could avoid or mitigate potential significant environmental impacts. Alternatives which Caltrans should consider are:

- a) Toll all vehicles using all lanes in each direction (existing freeway and any additional lanes), with accrued revenue to be directed to an independent agency that would assign funds to projects that would reduce VMT. These projects should include funding public transit, such as additional bus and train service, as well as incentives for higher-density housing near transit. It could also include rebates to low-income vehicle owners and/or other services benefiting low-income communities. These projects should be analyzed to determine if they can fully mitigate the emissions from all VMT that would be generated by the additional lanes.
- b) Toll all vehicles on two lanes in each direction (existing freeway and any additional lanes), with accrued revenue to be directed ... [same as in a) above].
- c) Toll single occupant vehicles on two lanes in each direction (existing freeway and any additional lanes), with accrued revenue to be directed ... [same as in a) above], as requested by the Yolo County Transportation District in its May 4, 2022 letter to Caltrans.

One or more of these alternatives could provide VMT limitation that is necessary for the Sacramento Area Council of Governments (SACOG) to demonstrate achievement of the State's 19% GHG reduction target pursuant to SB 375.

The DEIR fails to adequately evaluate induced travel. The DEIR shows a substantial increase in travel at the 2029 opening, and smaller increases long-term. Table 2.2-9 shows an immediate 9.2% increase in VMT for Alternative 2 compared with the No Build alternative, but a 2049 increase of only 4.2%. The corresponding figures for Alternative 3 are 9.2% and 4.3%. If induced travel due to changing land use and lifestyle patterns were fully taken into account, these long-term figures would likely be much higher. Caltrans should identify enforceable and funded mitigations to fully offset the likely VMT and GHG increases in the DEIR. The document's data does not support its conclusion of no or less-than-significant impacts. The DEIR states that the alternatives studied would have "no impact" on urban growth and population, air pollutants, and energy demand, and "less than significant" impacts on GHGs and state climate policy. These statements should be revised based on additional analysis and modeling practices that consider induced travel, a recirculated document.

The US EPA has designated Sacramento and Yolo counties as "serious" ozone nonattainment classification, meaning that federal transportation funds could be denied if their air quality districts cannot show a path to attaining those standards. In addition, these counties are in non-attainment for health-based State PM_{2.5} and ozone air pollution standards. However, the DEIR finds "no impact" for air pollution for the No Build alternative, even though Appendix J shows PM₁₀ increases of 3.5% (2029) and 22.2% (2049) compared to 2019, and an increase of 4.5% for PM_{2.5} in 2049. The DEIR does not show data for ozone, which is correlated with vehicular NO_x emissions.

In 2022, CARB issued an "Updated Health Endpoints Bulletin" that shows increased risk from exposure to PM_{2.5}, as demonstrated by increased cardiovascular hospital admissions, lung cancer incidence, asthma onset, work loss days, and increased hospitalizations for Alzheimer's and Parkinson's diseases. *See attached:* https://ww2.arb.ca.gov/sites/default/files/2022-11/California%20Air%20Resources%20Board%20Updated%20Health%20Endpoints%20Bulletin%20-%20Edited%20Nov%202022_0.pdf. Last year, based on such health studies, the US EPA proposed revising its annual PM_{2.5} standard from its current level of 12 to 9-10 micrograms per meter³ (<https://www.epa.gov/pm-pollution/national-ambient-air-quality-standards-naaqs-pm>).

CARB's guidance document "Strategies to Reduce Air pollution Exposure near High-Volume Roadways" (*see attached:* <https://ww2.arb.ca.gov/resources/fact-sheets/strategies-reduce-air-pollution-exposure-near-high-volume-roadways>) has "recommendations for siting and building new developments to be protective of public health, including siting schools, day care centers, playgrounds, and housing 500 feet or more from freeways." This is due to the relatively high concentrations of PM_{2.5} near freeways. Also, because the prevailing winds (toward NNW) would direct emissions from the project toward much of the populations of West Sacramento and Davis, the DEIR should provide an estimate of the additional morbidity and mortality that would result from its alternatives.

Therefore, the DEIR should be revised to consider US EPA's planned revision, and the DEIR statement "the difference between Build and No Build would be not significant in terms of PM₁₀

and PM_{2.5}” should be revised. The DEIR finding of “less than significant” air quality impacts for project alternatives is not accurate. Appendix J shows increases up to 13% for PM₁₀ in 2029 for alternatives 2-7b compared with the 2019 baseline. For 2049, it shows PM₁₀ increases up to 9.5% for alternatives 2-7a and up to 26.9% for alternatives 2-7b. For PM_{2.5}, increases are up to 6.7%. These increases are not “less than significant.” These figures also do not take into account induced travel, which would increase emissions of air pollutants and their precursors.

Because diesel vehicles produce approximately 20 per cent of global NO_x emissions, which are key PM_{2.5} and ozone precursors (<https://www.nature.com/articles/nature22086>), the DEIR should evaluate the NO_x emissions from these vehicles, which are likely to increase with the proposed freeway expansion.

As for greenhouse gases (GHGs), the DEIR shows that CO₂ emissions would increase by between 2.2% and 10.9% for the various project alternatives in the 2029 opening year. Caltrans should include induced travel, which would yield a much larger GHG increase. This is especially necessary considering CARB’s 2022 Scoping Plan, which provides a climate planning target to achieve carbon neutrality by 2045 by cutting GHG emissions 85% compared to 1990. The I-80 project is likely to produce large GHG increases, both in the short-term (2029) and the long-term (2049). Therefore, the cited increase in CO₂ emissions is inconsistent with State climate policy.

For these reasons, the Yolo I-80 DEIR should be revised and recirculated. Failure to do so would result in a legally deficient environmental analysis.

Sincerely,

A handwritten signature in cursive script that reads "Ralph Propper".

Ralph Propper
Climate Committee Chair, Environmental Council of Sacramento