



BAY AREA  
AIR QUALITY  
MANAGEMENT  
DISTRICT

June 24, 2024

Ms. Wahida Rashid  
Caltrans District 4  
Office of Environmental Analysis  
Mail Station 8B, P.O. Box 23660  
Oakland, CA 94623-0660

RE: I-680 Northbound Express Lane Completion Project Draft Environmental Impact Report/Environmental Assessment

Dear Ms. Rashid:

The Bay Area Air Quality Management District reviewed the I-680 Northbound Express Lane Completion Project Draft Environmental Impact Report/Environmental Assessment (DEIR/EA). The Project would construct a northbound express lane from Livorna Road to State Route 242 (SR-242) and convert the existing High Occupancy Vehicle (HOV) lane that runs from SR-242 to North of Arthur Road and the Benicia-Martinez Bridge Toll Plaza to an express lane. It is our understanding that the intent of the Project is to address existing transportation issues in the Project area related to congestion and operational improvements, and that four alternatives (1C, 2, 3 and 5) are being evaluated for environmental impacts prior to the selection of a Preferred Alternative. This letter provides Air District comments for your consideration.

### **Air Quality**

Alternatives 1C, 2, and 3 would close the 7.5-mile gap in the existing northbound I-680 managed lane system by adding an express lane to the freeway. The additional lane will increase vehicle miles traveled (VMT) and result in significant unavoidable transportation impacts that cannot be mitigated by the proposed VMT reduction strategies (I-680 Express Bus Service, Shared Mobility Hubs and Transportation Demand Management).

We support the selection of Alternative 5 as the Preferred Alternative. Alternative 5 was developed in response to California Senate Bill (SB) 743 which uses VMT as a basis for determining transportation impacts under the California Environmental Quality Act (CEQA). Alternative 5 will reduce the managed lane system gap by converting an existing inside lane into an express bus lane. By converting an existing lane, rather than constructing a new lane, Alternative 5 avoids potential environmental impacts by generating fewer VMTs and encouraging the use of transit.

### **Environmental Justice**

The Project is located within the boundaries of an Overburdened Community, as defined by the Air District's [Regulation 2, Rule 1: General Requirements](#). Overburdened communities typically experience higher health impacts from pollution exposure. Because of the potential impact to surrounding communities, the Air District strongly urges Caltrans staff to apply Environmental Justice principles as defined in Chapter 2 of the [Air District's California Environmental Quality Act \(CEQA\) Guidelines](#) entitled, "[Best Practices for Centering Environmental Justice \(EJ\), Health, and Equity](#)" to this Project.

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Chapter 2 of the Air District's CEQA Guidelines state that EJ "refers to the fair treatment and meaningful involvement of people of all races, cultures, incomes, and national origins, with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies." Consideration of race, demographics, and health outcomes of an impacted community are therefore crucial to a thorough and sensitive environmental review.

The significant impacts identified by the DEIR/EA may increase cumulative and disproportionate impacts in an Overburdened Community and therefore it is important that Caltrans meaningfully engages the community in Project decision making. Caltrans should fully describe the environmental setting of these communities and should complement the Project analysis with local knowledge about the location of polluting sources and sensitive receptors to inform the evaluation of cumulative impacts. Finally, Caltrans should consider preparing a racial impact statement as described in Chapter 2 of the Air District's CEQA Guidelines. Please contact Air District staff for additional resources and tools to help prepare a racial impact statement, as needed.

If you have any questions regarding these comments, please contact Andrea Gordon, Senior Environmental Planner directly at (415) 749-4940 or [agordon@baaqmd.gov](mailto:agordon@baaqmd.gov).

Sincerely,



Greg Nudd  
Deputy Executive Officer of Science and Policy  
Bay Area Air Quality Management District

cc: BAAQMD Director Ken Carlson  
BAAQMD Director John Gioia  
BAAQMD Director Gabe Quinto  
BAAQMD Director Mark Ross