



Oregon

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Heather Wills
Columbia River Crossing
700 Washington St., Suite 300
Vancouver, WA 98660

Dear Ms. Wills,

S-003-001

Thank you for the opportunity to comment on the Final Environmental Impact Statement for the Columbia River Crossing (CRC) project. The comments below are related to the sections of the Final Environmental Impact Statement (EIS) with a direct regulatory or technical nexus to DEQ, based on the preliminary information provided in the Final EIS. The comments do not represent all of the potential requirements DEQ may invoke once additional and more specific information concerning environmental media impacts are known about the project. We will work closely with you and the CRC team as more information becomes available.

DEQ appreciates that the CRC project team involved us early on in the technical analysis process, particularly related to Air Quality. Through its involvement with the InterCEP collaboration process, DEQ's Air Quality program had ample and early opportunity to recommend the use of the most appropriate sources of data and analytical methodologies available at the time. DEQ agrees that climate change is an important issue to evaluate and commends the CRC project team for evaluating and disclosing how greenhouse gas emissions would be influenced by the project's changes on transportation. DEQ expects that green house gas emission analysis and mitigation will continue to be incorporated into all aspects of the project.

Since then, DEQ has been working on the Portland Air Toxics Solutions (PATS) project, a community-based effort to improve public health in the Portland area by reducing risk from air toxics. Through an advisory committee, DEQ has been collaborating with local governments, citizens, communities and businesses to reach recommendations on understanding the regional air toxics problems and opportunities to reduce many pollutants from a variety of sources, including mobile sources. While the technical analysis in PATS was similar to that of CRC, it was not identical (different modeling timeframes, different pollutants, etc.), so results from both projects cannot and should not be compared directly. A link to the PATS project can be found at: <http://www.deq.state.or.us/air/toxics/pats.htm>, including a recommendation contained in the draft report that DEQ evaluate its emissions inventory based on the final design of the CRC. We look forward to future coordination with the CRC project team, Oregon Department of Transportation (ODOT), Metro and the other local transportation agencies as the project moves forward and to further reduce impacts from mobile sources.

Construction equipment represents the largest source category of diesel emissions in the Portland area. Diesel exhaust is a toxic air contaminant with levels in the Portland area which exceed Oregon health benchmarks. DEQ encourages the CRC project team to consider taking additional steps to incorporate clean diesel practices during the construction phases of the project. DEQ is willing to offer assistance to the CRC project team in exploring options to reduce diesel particulate emissions associated with this project.

S-003-001

The project has committed in the Record of Decision to a number of measures to reduce diesel emissions during construction, as well as to continuing to investigate additional measures that could be implemented. We need to be cognizant of how any added measures affect project costs, contracting, and other considerations, but we look forward to continuing to coordinate with DEQ in this investigation. We plan to investigate emerging technologies as well as other best practices and would appreciate DEQ's assistance, expertise, and input.

S-003-002 | Once the proposed final project scope is determined for the CRC project, DEQ will work with the CRC project team, ODOT, and others as appropriate, on stormwater permitting requirements. In addition, if the proposed project requires a Section 404 Clean Water Act Permit from the US Army Corps of Engineers, a 401 Water Quality Certification will be needed from DEQ. DEQ will review the details in the 401 Certification application when available and will provide input at that time.

S-003-003 | As you may know, Oregon has regulatory programs for solid waste and hazardous waste that are administered by DEQ. Once the proposed project is determined, DEQ welcomes the opportunity to work with the CRC team, ODOT and other agencies as necessary through an intergovernmental agreement, if appropriate, to provide technical assistance and discuss options for management of solid and hazardous wastes. DEQ can assist with regulatory questions or issues that may be identified during the planning, bidding, preparation and construction work for this project. The work can encompass a review of proposed sampling protocols, characterization and management options for all solid waste (including sediment or soil) as well as options to prevent generation of and management of hazardous waste. In addition, DEQ is available to review and provide input into the various plans that will be developed associated with hazardous and solid waste.

S-003-004 | DEQ very much supports the sustainability strategy goals and activities for this project. In particular, the goal to minimize the extraction and consumption of raw materials by promoting reuse and recycling of materials during the project is closely aligned with DEQ's work. Please contact DEQ staff to identify and obtain approval for productive reuse of waste materials through DEQ's recently adopted Beneficial Use Determination rules: <http://www.deq.state.or.us/lq/sw/disposal/beneficialuse.htm>

S-003-005 | Finally, there appears to be at least two ongoing environmental cleanup projects located in the area of the preferred alternative. Depending on the location of the final proposed project, assessment and evaluation of cleanup or other engineering controls may be required if any construction activities are proposed to encroach upon areas of contaminated soil or groundwater. DEQ's Cleanup Program has historically assigned a project manager to work with the local or state government to evaluate known or newly discovered contaminated sites on an expedited basis to ensure protection of human health and the environment. Early coordination with the DEQ regarding this topic should be initiated to ensure staff resources are available for the work in the timelines desired.

Thank you again for the opportunity to provide comments. If you have any questions, please contact Nina DeConcini, DEQ's Administrator for our Northwest Regional Office at 503.229.6271 or deconcini.nina@deq.state.or.us.

Sincerely,



Dick Pedersen
Director

Attachments: PATS Report Recommendations

S-003-002

The CRC project appreciates the insight on the permits needed prior to construction of the LPA. The CRC project will be submitting applications in accordance with Oregon and federal regulations. An individual permit from the Army Corps of Engineers will be sought under Section 404 of the Clean Water Act. In addition, a Section 9 Rivers and Harbors Act permit from the United States Coast Guard will be sought. Both of these permits will require an authorized Section 401 Clean Water Act Water Quality Certification from DEQ prior to approval. Additional coordination and project review will occur prior to and during permit review.

S-003-003

The project understands that ODOT's hazardous materials department would be working with the CRC team and DEQ to discuss options and management of solid and hazardous wastes, resolve related regulatory questions or issues, and obtain input into various plans associated with hazardous and solid waste.

Also, Focused Environmental Assessments (FEAs) would be reviewed and approved by the state DOT hazardous material departments within each respective state (Oregon and Washington). These FEAs will be conducted in areas not covered by Environmental Site Assessments (ESA), Phase 1 or Phase 2 assessments, and will address the potential to encounter hazardous materials at specific sites, impacts of construction on hazardous materials, and any hazardous materials discoveries. As part of the FEA work plan, the DOT hazardous materials departments will coordinate with ODEQ, WDOE, and/or EPA on any hazardous materials discoveries and will implement the response plan.

S-003-004

Thank you for that recommendation regarding compliance with DEQ's Beneficial Use Determination rules.

S-003-005

The project will assume that if it is determined that the location of the final proposed project does encroach upon areas of an ongoing DEQ environmental cleanup project, or a newly discovered site is encountered, that early coordination with the DEQ Cleanup Program would be initiated by ODOT and the CRC team to help ensure DEQ staff resources are available to expedite appropriate actions on a reasonable timeline.