

September 22, 2006

Kate Stenberg, AWV Environmental Manager
AWV Project Office (Wells Fargo Building)
999 Third Avenue, Suite 2424
Seattle, WA 98104-4019

Dear Ms. Stenberg:

Supplemental Draft Environmental Impact Statement (SDEIS) for
Alaskan Way Viaduct and Seawall Replacement Project

L-016-001

The Puget Sound Clean Air Agency appreciates this opportunity to comment on the Supplemental DEIS for the Alaskan Way Viaduct and Seawall Replacement Project. These comments are supplemental to our comments on the DEIS. The Agency reiterates its earlier stated position that compliance with state and federal conformity regulations does not constitute compliance with state and federal environmental statutes and regulations. The agency further reiterates that the demolition and construction phases of the project must be conducted with appropriate mitigation that minimizes public health risks for residents, visitors and waterfront business owners, promotes air quality and protects climate.

The Agency reiterates its earlier disappointment that the Hazardous Air Pollutants (HAPs), such as benzene, formaldehyde, and 1,3 – butadiene, have not yet been quantitatively analyzed. Concentration estimates can easily be determined using EPA's Industrial Source Complex Version 3, (ISC3) model. The final EIS ISC3 modeling should include an analysis of the HAPs. This information would assist decision makers in evaluating the alternatives, refining the preferred design, selecting mitigation measures and protecting public health from cancer-causing pollutants.

Because the project involves equipment not routinely used on highway construction projects, such as barges and soil processing equipment, the Agency wants WSDOT to ensure that emissions from all of the equipment used in demolition and construction are mitigated. Accordingly, in addition to the detailed construction air quality impact assessment committed to in the DEIS Air Quality Discipline Report and the mitigation elements recommended in our DEIS comment letter, we recommend collaboratively developing a construction period air pollution emission control plan. If such a collaborative process was used, WSDOT could commit to a construction mitigation plan concurrent with the conformity determination.

The agency commends WSDOT for proposing the Construction Transportation Management Plan, (CTMP), for mitigating construction period traffic impacts. The CTMP contains strategies that can also provide public health, air quality and climate protection benefits. Accordingly, we recommend that emissions reductions be one of the criteria used to select the strategies of the CTMP. The CTMP has excellent potential to be a pilot program for other construction projects and also to evaluate the effectiveness of the strategies as permanent alternatives to increasingly expensive capital project

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A Memorandum of Agreement has been developed between WSDOT and the Puget Sound Clean Air Agency to help eliminate, confine, or reduce fugitive dust during the construction period. State and federal environmental regulations, as well as the air conformity regulations, will be followed. Please see the Final EIS Appendix M, Air Discipline Report, for the current methods used to assess air quality effects for this project and for the effects discussion. Mitigation measures will be in place during the demolition and construction of the project as discussed in Chapter 8 of the Final EIS, and in the Air Discipline Report.

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improvements. We recommend that it be implemented in conjunction with the air quality construction mitigation plan recommended above.

In closing, the Agency reiterates its offer to assist WSDOT with the development of a construction air pollution emission control plan and extends the offer of assistance to include the CTMP.

If you have any questions concerning my comments please contact me at 206-689-4085 or paulc@pscleanair.org.

Sincerely,

Paul Carr, Air Resource Specialist

Puget Sound Clean Air Agency