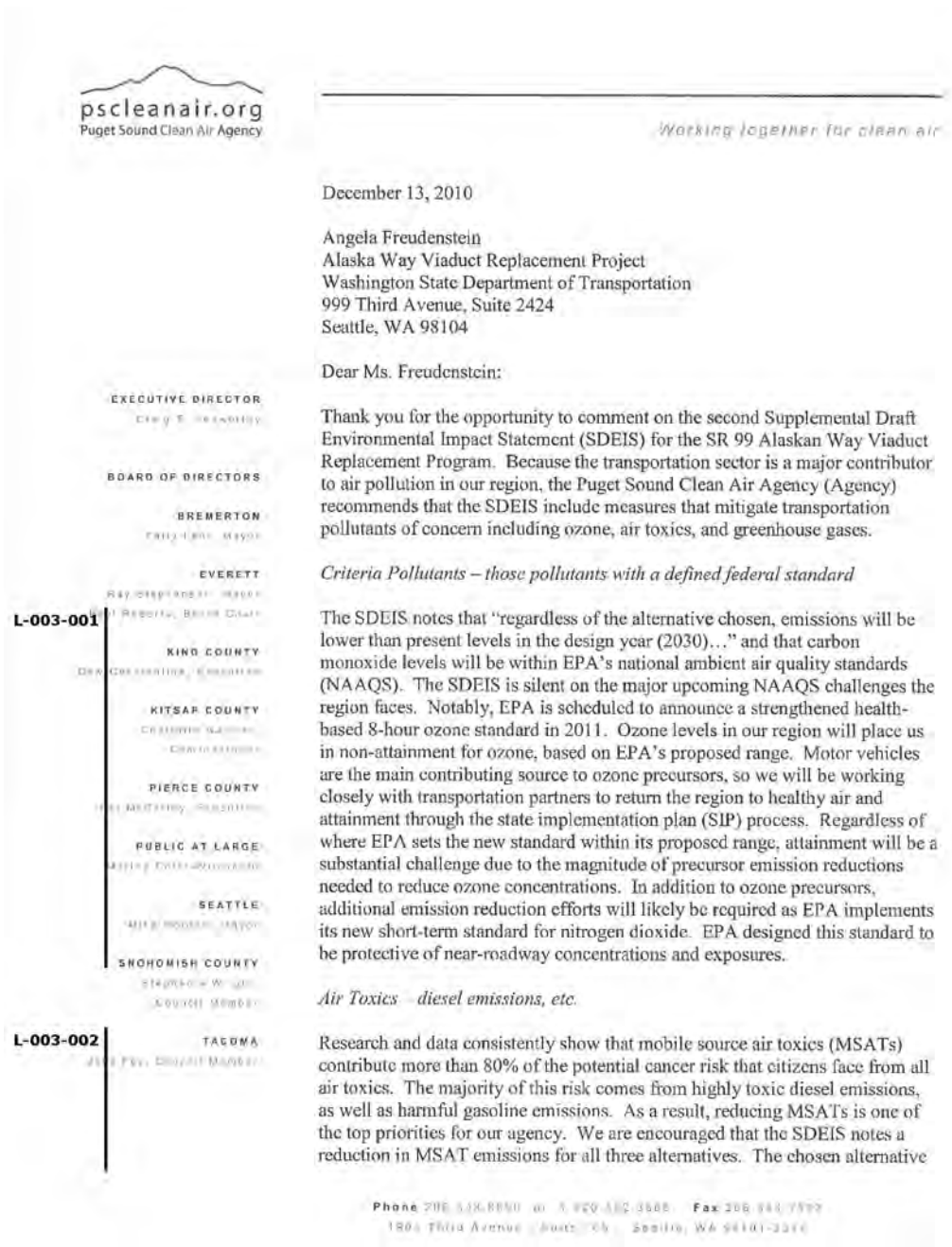

pscleanair.org
Puget Sound Clean Air Agency

Working together for clean air

December 13, 2010

Angela Freudenstein
Alaska Way Viaduct Replacement Project
Washington State Department of Transportation
999 Third Avenue, Suite 2424
Seattle, WA 98104

Dear Ms. Freudenstein:

EXECUTIVE DIRECTOR

BOARD OF DIRECTORS

BREMERTON

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SEATTLE

SNOHOMISH COUNTY

TACOMA

L-003-001

L-003-002

Thank you for the opportunity to comment on the second Supplemental Draft Environmental Impact Statement (SDEIS) for the SR 99 Alaskan Way Viaduct Replacement Program. Because the transportation sector is a major contributor to air pollution in our region, the Puget Sound Clean Air Agency (Agency) recommends that the SDEIS include measures that mitigate transportation pollutants of concern including ozone, air toxics, and greenhouse gases.

Criteria Pollutants – those pollutants with a defined federal standard

The SDEIS notes that "regardless of the alternative chosen, emissions will be lower than present levels in the design year (2030)…" and that carbon monoxide levels will be within EPA's national ambient air quality standards (NAAQS). The SDEIS is silent on the major upcoming NAAQS challenges the region faces. Notably, EPA is scheduled to announce a strengthened health-based 8-hour ozone standard in 2011. Ozone levels in our region will place us in non-attainment for ozone, based on EPA's proposed range. Motor vehicles are the main contributing source to ozone precursors, so we will be working closely with transportation partners to return the region to healthy air and attainment through the state implementation plan (SIP) process. Regardless of where EPA sets the new standard within its proposed range, attainment will be a substantial challenge due to the magnitude of precursor emission reductions needed to reduce ozone concentrations. In addition to ozone precursors, additional emission reduction efforts will likely be required as EPA implements its new short-term standard for nitrogen dioxide. EPA designed this standard to be protective of near-roadway concentrations and exposures.

Air Toxics – diesel emissions, etc.

Research and data consistently show that mobile source air toxics (MSATs) contribute more than 80% of the potential cancer risk that citizens face from all air toxics. The majority of this risk comes from highly toxic diesel emissions, as well as harmful gasoline emissions. As a result, reducing MSATs is one of the top priorities for our agency. We are encouraged that the SDEIS notes a reduction in MSAT emissions for all three alternatives. The chosen alternative

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L-003-001

Air quality effects described in the Final EIS are based on analysis based on current air quality regulations. The project meets the current national ambient air quality standards. As the EPA has not required any actions for possible future standards, future standards are not considered. Any future standards would not apply to this project. This project would be "grandfathered" and exempt from future standards. Please refer to Appendix M, Air Quality Discipline Report, for additional details.

L-003-002

The Final EIS estimates the potential Mobile Source Air Toxic (MSAT) emissions under the build alternatives under both the tolled and non-tolled conditions. MSAT emissions were lower than existing conditions under all build alternatives. The build alternatives had similar MSAT emissions. Please refer to Appendix M, Air Quality Discipline Report, for additional detailed analysis.

L-003-002 should maximize this reduction, minimizing the emissions of and exposure to these harmful pollutants.

Greenhouse Gases

L-003-003 Finally, Washington State and the City of Seattle have set rigorous greenhouse gas emission targets that require substantial reductions from the transportation sector as part of an overall solution to meeting those goals. We strongly support those efforts and encourage the Department to consider and address them throughout this project.

L-003-004 We are encouraged that the SDEIS finds a reduction in criteria pollutants, air toxics, and greenhouse gases for all three alternatives. We recommend that the Department add measures that further strengthen the alternatives to maximize this reduction. These measures can include increased levels of transit service, pricing, bicycle lanes, and pedestrian facilities as well as encouraging low-emission vehicle use. These strategies will help prepare our transportation system and the region for increasingly stringent regulations. In addition, the SDEIS should compare future air emissions to proposed regulations and existing GHG emission targets. The Alaskan Way Viaduct Replacement provides an important opportunity to build more climate and air quality-friendly transportation strategies for the city and the region.

Thank you again for this opportunity to provide comment. We look forward to working with you on improving air quality for all our Puget Sound citizens as the Department works on this and other projects in the coming years

Sincerely,

Craig Kenworthy
Executive Director

jwc

L-003-003

Estimates for the potential direct emissions of greenhouse gases under the build alternatives are provided in the Chapter 5 Permanent Effects of the Final EIS and Appendix R, Energy Discipline Report, Section 5.2 Operational Energy Effects Under 2015 Existing Viaduct Conditions and the 2015 and 2030 Bored Tunnel Alternative. All of the build alternatives would result in a decrease in greenhouse gas emissions, compared to the Viaduct Closed (No Build Alternative).

The study area evaluated includes areas likely to be affected by changes in greenhouse gas emissions as a result of the project. The greenhouse gas effects were estimated for roadways within the city center area, as well as in the region. The city center area is bordered by Prospect Street on the north, 15th Avenue on the east, S. Holgate Street on the south, and Elliott Bay on the west. The region includes all the traffic movements in King, Pierce, Snohomish, and Kitsap Counties.

L-003-004

A detailed cumulative effects analysis has been conducted for all alternatives and is described in this Final EIS. Additional King County Metro transit service will be provided as part of construction mitigation. Information on transit service as well as bicycle and pedestrian facilities can be found in the Final EIS Appendix C, Transportation Discipline Report.

The Final EIS analyzes the alternatives against the required standards.