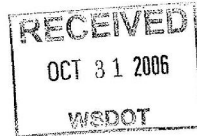




HEALTHY PEOPLE. HEALTHY COMMUNITIES.  
Dorothy F. Teeter, MHA, Interim Director and Health Officer



October 31, 2006

Paul Krueger  
WSDOT Environmental Manager  
SR 520 Project Office  
414 Olive Way, Suite 400  
Seattle, WA 98101

**RE: SR 520 Bridge Replacement and HOV Project's Draft Environmental Impact Statement**

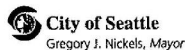
Dear Mr. Krueger:

**L-010-001** | The need to replace the SR 520 Bridge has been established and safety is a primary concern. However, the appropriate mitigations should be developed for the environmental and community health impacts. Each environmental issue should be presented after each alternative. It is difficult when the environmental issues are separated by geography. All alternatives will have significant health impacts. The Environmental Health Division of Public Health – Seattle & King County does not recommend any particular alternative. However the Environmental Health Division is concerned about the following environmental quality issues that affect human health:

**L-010-002** | Noise Issues – Noise levels as defined in King County Code Chapter 12.88 are known to impact health. Noise levels and those noise levels should comply with the Seattle and Bellevue codes or be mitigated. The DEIS makes clear comparisons for the noise levels for all alternatives and demonstrates that every one but the no action alternative would improve or diminish noise levels. Such comparisons should also be made for air quality, water quality and ecological impacts.

**L-010-003** | Air quality Issues – Clean air is vital to the health of individuals and our community. Diminished air quality can exacerbate asthma and lung diseases. Therefore, air quality should at least remain the same and not decrease during bridge construction and use of a new bridge. Further, the Environmental Health Division suggests that there should be additional air monitoring before, during, and after construction. In King County, asthma is the second most common reason for children to be admitted to the hospital.

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**L-010-001**  
**Comment Summary:**  
Format and Content

**Response:**  
See Section 23.1 of the 2006 Draft EIS Comment Response Report.

**L-010-002**  
**Comment Summary:**  
Format and Content

**Response:**  
See Section 23.1 of the 2006 Draft EIS Comment Response Report.

**L-010-003**  
**Comment Summary:**  
Air Quality (Construction)

**Response:**  
See Section 13.2 of the 2006 Draft EIS Comment Response Report.

- L-010-003** | Air quality is diminished by toxics and particulates. Traffic exhaust contains toxic chemicals that include carbon monoxide, diesel particulate matter, benzene, 1, 3-butadiene, formaldehyde and polycyclic hydrocarbons. This project is in an EPA non attainment area for carbon monoxide. Traffic exhaust also contains suspended particles that are main ingredient of haze and airborne dust. Suspended particles, particularly particles less than 10 microns (PM-10) are a health hazard. This project is in an EPA non attainment area for PM-10. Therefore, contributions to greenhouse gasses and global warming need to be considered. Finally, the DEIS should make clear comparisons for air quality for each alternative as it has done for the noise levels.
- L-010-004** | Water Quality Issues - Water quality should at least remain the same or improve with the construction and use of a new bridge. Elements to consider in water quality include water quantity, stormwater, spill containment, and wetlands. Water quality and water quantity are inseparable. Any increase in impervious surfaces increases the quantity of stormwater. Therefore, appropriately sized containment is essential. Stormwater calculations should be provided for each option. Retention facilities should be discussed. Diagrams of stormwater discharge areas should be provided and current flows should be compared with any changes. The ability of the containment wetlands to handle heavy metals and other toxics should be monitored. Toxic spill response also requires appropriate and appropriately sized containment. Wetlands may not be the appropriate containment for spills. Spill containment, treatment and removal of spilled materials should be discussed. As wetlands need to be replaced, they should be replaced one for one, with at least the same degree of quality wetlands being removed. Wetlands that are shaded should also be replaced one for one. The DEIS should make clear comparisons about water quality for each alternative as it has for noise levels.
- L-010-005** | Ecological Issues -- A healthy ecosystem is inseparable from human health because humans are part of the ecosystem and because diminishment of ecosystems is strongly linked to psychological conditions as well as unsustainable economic conditions. As John Muir said "Tug on anything at all and you'll find it connected to everything else in the universe." There should be an inventory of all the plant and animal populations, interactions and behavior patterns. Mitigations should be made in light of this ecological assessment.
- L-010-006** | There should be a net gain in vegetation, especially trees, based on the inventories noted above. Currently, all construction alternatives propose to remove trees.

#### **L-010-004**

##### **Comment Summary:**

Water Resource Effects During Operation

##### **Response:**

See Section 15.2 of the 2006 Draft EIS Comment Response Report.

#### **L-010-005**

##### **Comment Summary:**

Wetland Mitigation

##### **Response:**

See Section 16.1 of the 2006 Draft EIS Comment Response Report.

#### **L-010-006**

##### **Comment Summary:**

Fish and Wildlife (Mitigation)

##### **Response:**

See Section 16.2 of the 2006 Draft EIS Comment Response Report.

#### **L-010-007**

##### **Comment Summary:**

Wildlife Effects

##### **Response:**

See Section 16.2 of the 2006 Draft EIS Comment Response Report.

Paul Krueger  
October 30, 2006  
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- L-010-007** | However, vegetation will help clean the air for all. Older vegetation is able to clean air better than newer so there should be a net gain in plants. Additionally, the Arboretum collections should receive special attention, based on expert opinion, to assure that there is no loss to the Arboretum and therefore, to the community.
- L-010-008** | There should be no net loss in wildlife and fish based on the inventories noted above. Further, there should be no disruption in habitat migration and breeding areas. The DEIS should make clear comparisons for the ecological impacts between alternative proposals as has been done for noise levels.
- L-010-009** | Prioritize public transit - All alternatives should have a strong transit-focus. Each alternative needs to be strongly associated with promoting modes of transportation other than single-occupancy vehicles. Comparisons of impacts to transit should be made.
- L-010-010** | Bicycle and pedestrian safety and health - Pedestrian safety and bicycle safety must be protected. Biking and walking are legitimate forms of transportation and they provide physical activity which Public Health promotes. The public health goal is to improve health, fitness, and quality of life through daily physical activity and environmental protection. This is being accomplished by promoting activities that already exist, by partnering with other community efforts, and by developing new resources and improving access to existing resources through the efforts of organizations such as the King County Physical Activity Coalition and other Public Health programs. Therefore, it is important that bicycling and walking options are prioritized and carefully planned.
- L-010-011** | Finally, Public Health – Seattle and King County suggests that a Health Impact Assessment be conducted for the alternative chosen. Health impact assessment (HIA) is commonly defined as "a combination of procedures, methods, and tools by which a policy, program, or project may be judged as to its potential effects on the health of a population, and the distribution of those effects within the population" (1999 Gothenburg consensus statement, [www.who.dk/document/PAE/Gothenburgpaper.pdf](http://www.who.dk/document/PAE/Gothenburgpaper.pdf)). Further information can be found at <http://www.cdc.gov/healthyplaces/hia.htm> or by contacting Anne Bikle at [anne.bikle@metrokc.gov](mailto:anne.bikle@metrokc.gov) or 206 296 4794.

#### **L-010-008**

##### **Comment Summary:**

Wildlife Effects

##### **Response:**

See Section 16.2 of the 2006 Draft EIS Comment Response Report.

#### **L-010-009**

##### **Comment Summary:**

Regional Land Use and Transportation Planning

##### **Response:**

See Section 2.1 of the 2006 Draft EIS Comment Response Report.

#### **L-010-010**

##### **Comment Summary:**

Bicycle/Pedestrian Path

##### **Response:**

See Section 2.3 of the 2006 Draft EIS Comment Response Report.

#### **L-010-011**

##### **Comment Summary:**

Health Impact Assessment

##### **Response:**

See Section 7.2 of the 2006 Draft EIS Comment Response Report.

Paul Krueger  
October 30, 2006  
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Thank you for the opportunity to comment on the Washington State's Department of Transportation's SR 520 Bridge Replacement and HOV Project's Draft Environmental Impact Statement.

Sincerely,



Ngozi T. Oleru, Ph.D., Director  
Environmental Health Services Division  
Public Health – Seattle & King County

NTO:dm

cc: Dorothy Teeter, MHA, Interim Director and Health Officer, Public Health –  
Seattle & King County, (PHSKC)  
Greg Kipp, Chief Administrative Officer, PHSKC  
Anne Bikle, Environmental Health Public Health Planner, PHSKC  
Lee Dorigan, Supervisor, Special Projects, PHSKC