

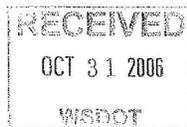


Working Together For Clean Air

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Seattle, WA 98101-2038

October 31, 2006



Paul W. Krueger
Project Environmental Manager
WSDOT Urban Corridors Office
414 Olive Way, Suite 400
Seattle, WA 98101-1209

Dear Mr. Krueger:

SR 520 Bridge Replacement and HOV Project
Draft Environmental Impact Statement

Thank you for the opportunity to comment on the environmental analysis for the SR 520 Bridge Replacement and HOV project DEIS. The DEIS provides a clear presentation of air quality issues, however the focus and analysis needs to be improved in order to assist decision makers in selecting the best alternative, protecting public health, improving air quality, and protecting global climate. We also have a number of recommendations for the preferred alternative.

The DEIS could be improved by addressing the following:

- Shift the focus from carbon monoxide (CO), which is a pollutant of declining concern, to toxic air pollutants and greenhouse gases, which are of increasing concern locally and globally.
- Provide additional discussion of the impact on greenhouse gases and mitigation measures for protecting global climate.
- Clarify that CO and carbon dioxide (CO₂) are different emissions with different characteristics and impacts, requiring different mitigation. For example, CO is primarily a wintertime problem, while CO₂ is a problem year-round. The current discussion of the similarity of CO and CO₂ vehicle emission rates could create a misimpression that technology can significantly reduce CO₂ emissions as it has reduced CO emissions. Through technology, overall CO emissions have been reduced even while vehicle-miles-traveled has increased. There is no comparable history of reduction in emissions for CO₂ and no currently available technology able to reduce CO₂ emissions from internal combustion powered vehicles.
- Provide additional discussion of the impact and mitigation of toxic air pollutants. While there are no national ambient air quality standards for air toxics and the subset of mobile source air toxics (MSATs), they pose a public health risk. Many are known carcinogens, and both monitoring and modeling have shown them at levels that present health risk in our area. Currently available technology to reduce these emissions should be considered. Additionally, the proposed cut-off of 10 tons of a single air toxic (25 tons combined), equivalent to EPA's definition of a major source, does not seem sufficient to designate "low" and "high" risk MSATs. To do so would underestimate potential health risks from sources consistent with EPA's definition of area sources. Attachment B of our April 6, 2005 letter contains a number of sources that could assist in the rewriting of this discussion.

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Printed on recycled paper
Pub. No. 30-7

R-001-001

Comment Summary:

Energy and Greenhouse Gases

Response:

See Section 14.0 of the 2006 Draft EIS Comment Response Report.

R-001-002

Comment Summary:

Energy and Greenhouse Gases

Response:

See Section 14.0 of the 2006 Draft EIS Comment Response Report.

R-001-003

Comment Summary:

Air Quality Analysis

Response:

See Section 13.1 of the 2006 Draft EIS Comment Response Report.

R-001-004

Comment Summary:

Air Quality Analysis

Response:

See Section 13.1 of the 2006 Draft EIS Comment Response Report.

Paul W. Krueger
WSDOT Urban Corridors Office
October 31, 2006
Page Two

- R-001-005** | • Fully respond to the issues raised in Attachment A of our letter of April 6, 2005 commenting on this project.
- R-001-006** | • Provide additional discussion of the air quality impacts of closing the westbound HOV lane for 2 years during construction, and on air quality during the construction period and in the post construction period.
- R-001-007** | • What happens to transit ridership and single-occupancy vehicle use and the associated emissions if additional transit service is not provided?
- R-001-008** | We recommend that the selected alternative and the Record of Decision (ROD) include the following measures to mitigate potential impacts to public health, air quality, and global climate:
- (1) Secure the commitment to provide increased transit service by the time of the ROD.
 - (2) Mitigate construction period emissions by giving priority during the bidding process to construction companies that will use retrofitted diesel equipment on the project and by retrofitting diesel-powered equipment that is used on the project.
 - (3) Provide HOV lanes in both directions throughout the construction period.
 - (4) Design and construct all HOV, transit, light rail, pedestrian, bicycle, and park & ride facilities, and their connections, not only to increase their use, but to ensure no break in service, no diminution in service, and no increase in travel time. For example transit stops and terminals should be adjacent to light rail stations and the pedestrian connections between them should be protected from adverse weather conditions.

If you have any questions or need further information, please contact Paul Carr of our staff at (206) 689-4085 or e-mail to paulc@pscleanair.org.

Sincerely,



David S. Kircher
Manager, Air Resources Department

DSK/lh

R-001-005

Comment Summary:

Air Quality Analysis

Response:

See Section 13.1 of the 2006 Draft EIS Comment Response Report.

R-001-006

Comment Summary:

Air Quality (Construction)

Response:

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

R-001-007

Comment Summary:

Methodology (Freeway)

Response:

See Section 5.1 of the 2006 Draft EIS Comment Response Report.

R-001-008

Comment Summary:

Format and Content

Response:

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