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Sent: Saturday, November 27, 2010 1:35 PM
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Subject: Public comment

I-042-001

On page 173 of the summary of the EIS for the AlaskanWay Viaduct Replacement Project, under 'Other Cumulative Effects' there are four bullet points: public services and utilities, air quality, energy and greenhouse gas emissions and wildlife, fish and vegetation.

Missing is one of the most significant environmental degradations: the greenhouse gases emitted in the production of hundreds of thousands of square yards of concrete necessary for such a project.

The production of concrete, worldwide, creates ten per cent of the green house gases. While this project represents a tiny part of the total concrete produced and may seemingly not rise to the point of significance, every bit of concrete produced simply adds to the problem and truly cannot be mitigated. Every project ever done by man could make a serious claim that it is so small that it has very little environmental impact, but we have come to understand that environmental damage is cumulative and not to be considered in isolation.

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Further, the entire Alaskan Way Viaduct Project is a continuation of the idea that 'enough concrete will solve our transportation problems'. This has never been the case (no congested city has ever 'solved' its transportation problems by building another road; most studies indicate that more roads simply begat more travel).

Imagine if we solved the congestion in this corridor by traffic management and not building another four lanes of highway. Perhaps here, now, we can show that world how this can be done and avoid the release of more greenhouse gases in the production of more concrete.

The EIS should reflect the fact that environmental damage occurs with the production of every square yard of concrete.

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The build alternatives would result in indirect greenhouse gas emissions, which are not released by the project, but are nonetheless caused by the project. Greenhouse gases would be emitted during the production and disposal of materials used for project-related construction. For example, emissions would be released during the production of the concrete used in construction or the manufacture of the equipment used during construction. Indirect emissions are also known as embodied and lifecycle emissions. At this time, there is no consistent and standardized method for calculating the embodied and lifecycle emissions for transportation projects. There are no tools currently available for clearly and meaningfully discerning which emissions are attributable to a specific project and which emissions would have occurred without the project. However, as with all environmental disciplines, vendors that produce equipment and materials used in project construction are subject to regulation at their facilities.

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FHWA, WSDOT, and the City of Seattle appreciate receiving your comments on the project.