UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

May 3, 2010

Ms. Yamilee Volcy
Federal Highway Administration
711 South Capitol Way, Suite 501
Olympia, Washington 98501

Re: SR 502 Corridor Widening Final Environmental Impact Statement and Section 4(f) Evaluation; EPA Project Number: 08-033-FHW

Dear Ms. Volcy:

The U.S. Environmental Protection Agency has reviewed the SR 502 Corridor Widening Final Environmental Impact Statement and Section 4(f) Evaluation (FEIS). We are submitting comments in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

We would like to thank the SR 502 project team for their response to our comments on the Draft EIS and for the site visit on March 17, 2010. We appreciate that FHWA and WSDOT gave thoughtful consideration to our comments and did explore potential implementation for recommendations such as providing permeability for wildlife along the widened roadway. There are clearly efforts to provide high quality compensatory mitigation for impacts to aquatic resources as well. The NEPA document is well written and presented, and is appropriate in length. Thank you for all the attention to these matters. Additional comments on the FEIS are offered below.

Air quality

The response to our comments issued February 24, 2010 indicates WSDOT will look for opportunities to encourage contractors to mitigate air toxics and diesel particulates from construction vehicles and equipment. However we note that this statement is not included in the list of environmental commitments in Section 7 of the FEIS. We hope that this action will be carried forward and perhaps strengthened with requirements or incentives to contractors to provide these construction mitigation measures.

Recommendation: Include in the Record of Decision (ROD) a commitment to require or provide contractor incentives to obtain air quality construction mitigation measures to minimize construction-related emissions of air toxics and diesel particulates.

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Greenhouse gas emissions (GHGs), public transit needs

The project proponents are generally accepting of the fact that the SR 502 travel corridor is an auto-dependent environment where traffic volumes are expected to triple with either alternative (although both traffic volumes and vehicle miles travelled (VMT) would be higher with the Build Alternative (p.3-3)). With the Build Alternative, there is projected to be no reduction in pounds of carbon dioxide emissions by 2033. We are concerned about this because, on a global basis, we have exceeded the threshold of harm from GHGs in the atmosphere. This together with our responsibility to meet state and national GHG reduction commitments make it important for every proposed project to explore ways to reduce GHG emissions.

To address this we encourage WSDOT to continue coordination with C-TRAN and Clark County with a focus on providing improved transit service and facilities sooner than currently projected. The FEIS indicates (p. 3-1) that about 60% of the traffic using SR 502 travels to and from Battle Ground; 25% travels to areas north of Battle Ground; and 15% travels to outlying areas east and south of Battle Ground. This is good information, which could become even more helpful if both origins and destinations were known to inform transit planning.

Recommendation: Continue coordination and collaboration with C-TRAN and Clark County regarding the need and potential for improved transit. In partnership with C-TRAN and Clark County, conduct origin-destination studies to inform transit planning and service.

The FEIS states (p. 3-12, 3-13) that the SR 502 corridor widening would not preclude the installation of future bus stops and pullouts or establishment of a Park and Ride facility along the corridor. We encourage FHWA, WSDOT, and local land use planning and transit partners to evaluate the time and cost savings of constructing transit pull outs at the most heavily used intersections as part of this proposed corridor widening. We also encourage early identification and acquisition of the Park and Ride facility along the corridor so that development, which is anticipated to occur, does not preclude and/or unduly increase the cost for such a facility.

Recommendation: Explore with C-TRAN and Clark County how current and future transit facility needs, such as, transit pullouts and Park and Ride facilities, could be integrated and implemented with construction of the proposed project.

Ecological connectivity

We appreciate that 4 stream simulation culverts would be included in the proposed project. The FEIS states that these culverts would provide passage for amphibians, birds, and rodents, as well as fish. Because the at-grade roadway would not provide permeability for wildlife, it would be helpful to examine whether a slight enlargement of the culverts could accommodate larger mammals as well.

Recommendation: Consider a modest enlargement of the stream simulation culverts to provide for larger upland species movement.

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Farmland losses

The FEIS states (p. 6-6) that "There are no indirect effects of the Build Alternative that contribute to cumulative effects on agriculture and farmlands." This conclusion is apparently based on the Clark County 2007 Comprehensive Plan, which would allow conversion of approximately 7,100 acres of prime farmlands to other land uses. While the Comprehensive Plan is an important piece of information to consider, we believe an analysis of induced travel from the proposed project should be conducted before concluding that no additional growth outside the urban growth boundary (UGB) would occur. The analysis should answer the question: Given the reduced travel time from the corridor widening project, are there more distant destinations and/or geographic areas that would become more accessible to travelers, which could in the longer term result in farm (or other resource) land conversion to commercial, recreational, residential, industrial, or other uses and, if so, are these areas located within or outside the Clark County UGB?

Recommendation: Please consider analyses such as the one described above for this and other future transportation projects and disclose results in the NEPA document to inform the public and decision makers.

Thank you for the opportunity to comment on the Final EIS for the SR 502 Corridor Widening. If you would like to discuss the project further, please contact Elaine Somers at, (206) 553-2966 or me at, (206) 553-1601.

Sincerely,

Christine B. Reichgott

Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit

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