



U.S. Department  
of Transportation

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HFO-WA.3/NSC

John Covert  
811 W 24th Ave  
Spokane WA 99203

**North Spokane Corridor (NSC),  
Supplemental EIS**

Dear Mr. Covert:

Your letter to Dan Mathis, "Supplemental EIS for US-395 North Spokane Corridor Project" outlines the reasons for which you feel a Supplemental Environmental Impact Statement (SEIS) should be prepared for the Washington State Department of Transportation's (WSDOT) North Spokane Corridor (NSC) project. The two areas of concern you identify are Mobile Source Air toxics (MSAT), and induced travel.

Air toxics analysis is a continuing area of research. While much work has been done to assess the overall health risk of air toxics, many questions remain unanswered. In particular, the tools and techniques for assessing project-specific health impacts from MSATs are limited. These limitations impede FHWA's ability to evaluate how mobile source health risks should factor into project-level decision-making under the National Environmental Policy Act (NEPA). In addition, EPA has not established regulatory concentration targets for the six relevant MSAT pollutants appropriate for use in the project development process. Given the emerging state of the science and of project-level analysis techniques, there are no established criteria for determining when MSAT emissions should be considered a significant issue in the NEPA context. Any future Supplemental EIS for the NSC project will include, at a minimum, a qualitative analysis of MSATs.

In regard to induced travel, traffic volumes for this project are based on data from the Spokane Regional Transportation Council (SRTC), which is the Metropolitan Planning Organization (MPO) for the Spokane area. As a part of SRTC's traffic modeling process they have taken into account the comprehensive (land use) planning efforts of the local agencies. Washington State's Growth Management Act has required local agencies to undertake a substantial degree of land use planning, including the identification of capital improvements such as roads, utilities, etc., that are needed to support their comprehensive plans. WSDOT, as the sponsoring agency for the NSC project, was required to show that the project is consistent with current land use. Any



future land use changes to jurisdictions in the vicinity of the NSC are the responsibility of the local agency.

The current NSC alignment was developed using the best available science at the time of the NEPA decision. Based on the current state of the research for MSATs, and the fact that the current NSC project, and future segments have been determined to be consistent with local agency planning efforts, a supplemental EIS is not warranted based on the information provided in your letter. However, FHWA will continue to evaluate the need for a supplemental EIS as WSDOT continues to develop construction projects for the NSC.

Sincerely,

DANIEL M. MATHIS, P.E.  
Division Administrator

A handwritten signature in cursive script that reads "Steve Saxton". The signature is written in black ink and is positioned above the typed name and title.

By: Steve Saxton  
Area Engineer