

SIERRA CLUB COMMENTS ON AMENDMENT TO DRCOG REGIONAL TRANSPORTATION PLAN
FOR THE PROPOSED ADDITION OF THE REVISED I-70 PROJECT

(January 20, 2016)

Last year DRCOG amended the Denver Regional Transportation Plan (RTP) to add the I-70 expansion project to the RTP. At that time, the Sierra Club submitted comments asking DRCOG carefully consider the health benefits to the residents in communities and students in schools adjacent to the proposed expansion to I-70 through North Denver. We submitted data from Denver Environmental Health showing a significantly higher incidence of the diseases linked to highway pollution among the residents of these communities, and the availability of operational control measures to reduce emissions from the Project by nearly 40%. Specifically, the Club asked DRCOG to evaluate, and adopt, a mitigation strategy that would divert heavy duty trucks from the I-70 corridor between Brighton Boulevard and Colorado Boulevard.

The effect of this operational measure would be to allow long-distance trucks traveling through the metro area to use I-76 and I-270, and trucks seeking access to local destinations between Brighton and Colorado Boulevards to disperse using local boulevards. The effect would be to remove all of the emissions from interstate and cross-state truck trips, and emissions from most local truck trips, from the neighborhoods adjacent to the I-70 corridor.

Research submitted to both CDOT and Federal Highway Administration officials show a strong correlation between exposure to highway pollution and asthma attacks, especially among children, and deaths from cardiovascular disease. These are the adverse health effects that Denver Environmental Health found to be disparately occurring among residents in the communities nearest I-70.

The Final EIS does not evaluate or respond to the recent health effects research submitted by the Club to CDOT and FHWA in comments on the SDEIS. Nor does the FEIS even mention the most recent research discussed in person with Director Bhatt and FHWA officials last summer. These most recent research reports confirm EPA's earlier finding that exposure to PM2.5 emitted from highways is directly linked to the increased incidence of asthma and cardiovascular mortality. In addition, a study performed by the California Office of Environmental Health Hazard Assessment pin points the carbon particles emitted from trucks as most responsible for increased mortality from heart disease. We submit these research reports to you tonight.

In addition, we urge you to consider another study we submit tonight showing that the rate of cardiovascular deaths declined significantly where annual PM2.5 concentrations were reduced by 3 ug/M3 over a 10 year period. An analysis of multiple risk factors in addition to improved air quality demonstrated that most of the reduction in cardiovascular deaths was associated with the lower pollution concentrations. This study shows that you have it in your power to save lives among the residents of Globeville/Elyria and Swansea.

Given that neither CDOT nor FHWA has considered this research, or undertaken any investigation of the relationship between the disparate health outcomes observed in the Globeville/Elyria and Swansea neighborhoods and emissions from I-70, the Club asks that DRCOG undertake this investigation and give

serious consideration to protecting the residents of these communities by removing truck emissions from the I-70 segments where the EIS modeling shows that exposure to PM emitted from the highway will be greatest.

As we discussed in our comments last year, the federal planning requirements were amended in 2005 and again in 2012 to require that regional transportation plans “minimize air pollution.” We ask that you adopt a regional transportation plan that accomplishes this planning objective for the residents of Globeville/Elyria and Swansea where the health impacts of highway emissions will be the greatest by adopting and implementing the mitigation that can be achieved by removing truck emissions from these neighborhoods. A summary of those amendments to federal planning requirements are attached as an Appendix to this comment.