

January 30, 2006

Daniel M. Mathis  
Division Administrator  
Evergreen Plaza  
711 S Capitol Way  
Suite 501  
Olympia, WA 98501-1284

**RE: Supplemental EIS for US-395 North Spokane Corridor Project**

Dear Mr. Mathis:

Citizens for Sensible Transportation Planning, in conjunction with the Sierra Club, the Selkirk Conservation Alliance, and the Spokane Preservation Advocates, requests that a supplemental environmental impact statement (EIS) on the US-395 expansion project be prepared and circulated for public comment and hearing. Subsequent to the close of the administrative record for the draft and final EIS on the US-395 project, new information came into the public domain which presents a very different picture of the likely impacts of the proposed action. Pursuant to section 1502.9(c) of Title 40 of the Code of Federal Regulations, this new information requires, at a minimum, the preparation and circulation of a Supplemental draft EIS.

**Cancer Effects of Highway Traffic**

Two major studies released in early 2000 document the alarming connection between vehicle emissions and cancer in communities adjoining highways. In March 2000, a study entitled "The Multiple Air Toxics Exposure Study" (the "MATES-II" study) was finalized by the South Coast Air Quality Management District, the public agency regulating air quality in the Los Angeles Basin. The MATES-II study is a landmark scientific study of the cancer risk associated with toxic air contaminants in urban settings.

Notably, the MATES-II study concluded that the risk of cancer in the South Coast Air Basin is 1400 cases per million population, and that **90% of this cancer incidence is associated with mobile (e.g. vehicle) sources**. (MATES-II study at Exec. Summ. P.3 and p. 7-1). Further, the modeling results for this study show that **higher risk levels occur near freeways**. (Id. at Exec. Summ. p. 5 and pp. 5-9 and 7-2). The MATES-II study presents disturbing evidence that freeway construction and expansion poses a significant risk to public health. Worse yet, recent evidence from another scientific study indicates that children may bear the brunt of this public health tragedy.

A study entitled "Distance Weighted Traffic Density in Proximity to a Home is a Risk Factor for Leukemia and Other Childhood Cancers" was published in the February 2000 issue of the Journal of the Air and Waste Management Association. This case

control study of childhood cancer rates in proximity to Denver-area highways was conducted under the auspices of the Electric Power Research Institute. It represents a major development in the scientific literature, and reports a strong association between childhood cancers and vehicle emissions in major highway corridors. The study found that children with leukemia were 12 times more likely to live close to highways than children without leukemia, and concluded that a “strong association” exists between proximity to high traffic streets and childhood leukemia. JAWMA Study at 2. The study built on established research connecting childhood cancers to benzene and other volatile organic compounds found in automobile emissions. Id.

Neither the Final Environmental Impact Statement (FEIS), nor its Final Supplemental Environmental Impact Statement (FSEIS), for the US-395 project addressed these public health issues in any fashion. Yet the US-395 project creates 10 miles of freeway where there currently isn't any freeway and triples the freeway traffic lanes in Spokane's East Central Neighborhood, including areas where children will attend school directly adjacent to the expanded freeway. The new evidence of a potentially tragic impact from the US-395 project is credible and reliable. The recent studies demonstrate the urgent need for a reassessment of the US-395 project, with attention paid to the public health of persons residing or attending school in the corridor of the US-395 project. More importantly, FHWA must develop mitigation to protect the health of children in the highway corridor.

The regional modeling assessments performed to satisfy the “conformity” requirements of the CAA addressed only the direct emissions of CO, PM-10 and ozone precursors from motor vehicles. The neither the FEIS nor the FSEIS addressed the cancer risk associated with toxic air contaminants in urban settings.

### **Induced Travel**

In January 2000, the Transportation Research Board (TRB) published several reports submitted for its Year 2000 annual proceeding. Among them were several new studies pertaining to the phenomenon of “induced travel.” This recent research provides persuasive evidence for the existence of induced travel (i.e., an increase in roadway supply reduces the time cost of travel, and thus increases the length and frequency of vehicle trips referred to as “induced travel”). Induced travel effects include changes in land development and the location of households and employment, the number of trips made, destination choice, mode choice, route choice, and departure time choice. The U.S. Environmental Protection Agency (EPA) has conducted a review of the induced travel literature for their Science Advisory Board and concluded that this research “has not only built a strong case for the existence of induced travel effects, but in some cases suggests that a large fraction of growth in VMT is directly attributed to increases in road capacity” (EPA, 2000). One of the difficulties of testing the induced travel hypothesis has been controlling for confounding economic activity variables such as population, income, and other demographic trends. Much of the recent induced travel research, however, has controlled for these variables and has not been able to reject the induced travel effect of new highway capacity. (Noland and Cowart, 2000; Fulton et al., 2000; Noland, 2000).

This most recent research contradicts a fundamental premise relied upon by FHWA in the EIS and ROD for the US-395 project – that the US-395 expansion would only serve, not exacerbate, regional traffic. To the contrary, the recent research documents that highway expansion will exacerbate traffic demand by altering land use and associated trip distribution, frequency and length. In light of this recent evidence that highway expansion directly affects traffic patterns, even in rapidly growing areas, the EIS and ROD suffer from a major deficiency in their environmental analysis. FHWA must revisit its analysis of the induced travel issue in a supplemental EIS.

## **Conclusion**

For all of the reasons stated above, the Citizens for Sensible Transportation Planning, in conjunction with other interested parties, requests that the Federal Highway Administration prepare and circulate a supplemental draft EIS for the US-395 project. If you have any questions regarding this correspondence, please contact me at 509-456-8330.

Sincerely,

John Covert, Citizens for Sensible Transportation Planning

cc:

Chase Davis, MURP and Sierra Club Inland Northwest Regional Representative;  
Mark Sprengel, Executive Director, Selkirk Conservation Alliance;  
Dave Shockley, Vice President, Spokane Preservation Advocates