January 3, 2005

Mr. Mark L. VonderEmbse
Federal Highway Administration
200 North High St., Room 328
Columbus, OH 43215-2048

Subject: Eastern Corridor Draft EIS

Dear Mr. VonderEmbse,

These comments are by Rivers Unlimited, an Ohio organization, the nation's oldest statewide river restoration and protection group.

Rivers Unlimited has been associated with the protection of the Little Miami from the impacts of a highway in its floodplain and another bridge crossing since 1974, when the project was known as Relocated U.S. 50. Pursuant to our collective efforts with Little Miami, Inc. and Sierra Club, the USDOT effectively rejected the original Environmental Impact Statement several years before this section of river was even designated an NW&S River, on the grounds that it was being considered for National status.

Our following comments are limited to the highway transportation section of the plan. As designed it will degrade the values for which this river has been set aside.

THE LITTLE MIAMI IS A *NATIONAL WILD AND SCENIC RIVER*

What does that mean? It means that the river has *outstandingly remarkable values,* as determined by the National Wild and Scenic Rivers Act of 1968. In general, these values are scenic, fish and wildlife, recreational, historical, cultural and other similar values.

The DEIS ignores the significance, the extraordinary rarity of the Little Miami National Wild and Scenic River.
Note the following facts:

1. There are 3-1/2 million miles of rivers in the United States.

2. Of these, 11,000 miles plus are protected by the National Wild and Scenic Rivers System (NW&SRS), or 0.3 percent (three-tenths of one percent.).

The NW&SRS includes those Section 2(a)(i) rivers managed by the federal government and declared by act of Congress, typically those flowing through National Park Lands, National Forest Lands and Bureau of Land Management Lands, or about 90% of our protected rivers.

3. The System includes another 10% of our protected rivers, or 1000 miles of river, under Sec. 2(a)(ii). These are mostly state-managed at the wish of state governors and legislatures and designated by the Secretary of the Interior. That is 0.03 percent of the NW&SRS, or three-hundredths of one percent of all our river miles. It has taken 37 years to garner and maintain nominal protection for this tiny selection.

The Little Miami is one of the three-hundredths of one percent of river miles in this Sec.2(a)(ii). The Little Miami flows through mostly privately-owned lands and only at the wish of the landowners along it. Such rivers are the most difficult to protect. *Protection efforts began in 1967 and continue today.*

The DEIS should acknowledge that had that bridge and highway been in place in 1981, the lower section of the Little Miami would not have qualified to be a National River, as too many of its "outstandingly remarkable" qualities would have been reduced or destroyed. With bridge and highway in place in future, the U.S. Secretary of the Interior could remove the designation with impunity.

Indiana has no National Rivers at all. Kentucky has one, the Red, managed by the U.S. Forest Service. Seven states have none at all. The Little Miami is rare, it is one of only two rivers in the nation flowing through a major metropolitan statistical area.

BENEFIT-COST OF THE NATIONAL RIVER

The DEIS fails to acknowledge the value - in dollars – contributed by the Little Miami Corridor and river to the regional economy as an asset and amenity to the region and the local communities. It offers clean air, clean water, quiet, open space, nature, birds, fish and wildlife. It provides fishing, hiking, canoeing, kayaking, tubing, swimming and birdwatching (the area is an Audubon Important Bird Area). Many millions of dollars have been contributed toward the preservation and improvement of the lower section of the river over the years since 1967 – public national, state and local, private and institutional funds.

If the area were set aside as a park, with rustic trails and inconspicuous entries and river access points, we suggest that it would become the Central Park of Greater Cincinnati. That would have a markedly beneficial effect upon the local tax base, adding considerably to the value of properties near the river, to river-related commerce and to the public image of communities along the river. It would become a significant tourism destination if so desired by its communities.

The DEIS should note this park potential as a stark loss to the community if the bridge/highway goes through it. There is no way to mitigate such an environmental loss. No benefit/cost analysis of the project is credible if it fails to determine the actual potential of the area as a park, and then fails to show the loss in the benefit/cost analysis. The National Park Service has a better understanding of the value of this undisturbed enclave as shown in its recent comments on the DEIS.

`OIL AND THE EASTERN CORRIDOR

The DEIS fails to acknowledge the world and national growing scarcity of oil and gas. We should question the wisdom of building any more highways as the reality of our future slowly descends upon us. The proven reserves of oil, plus higher technology, plus new discoveries don't have a chance of giving us all we need as world demand rises rapidly. The Wall Street Journal reported in September that evidence of a global slowdown in petroleum output can no longer be ignored.

China is moving millions of farmers off their land for American-style development. China will have cars in their garages. India is developing too, with us as a model. We have no plans to develop renewable energy. We will drill, we will import if we can, we will have to compete with the rest of the world, we will assuredly have to pay far more than we do now for gas. *That boring phrase "mass transit" will become our reality.*

The following books reflect on this future:

Blood and Oil: The Dangers and Consequences of America's Growing Petroleum Dependency… Michael Klare

Out of Gas… Richard Goodstein

The End of Oil…Paul Roberts

The Party's Over…Richard Heinberg

plus, The End of Suburbia… a film

We are way overdue in preparing to move people, not cars. Perhaps we were smarter in 1921, when we planned and built part of a subway in Cincinnati. If we fail to dominate world oil and gas supplies, (by force if necessary), we will be far less able to afford to commute by driving. This factor alone completely destroys the purported benefit/cost ratio of 2 to 1 and substitutes mass transit as the only alternative in the long term, which we would define as the reasonable design life of a new highway after it is finally built.

Proposing this Eastern Corridor as a multimodal transportation corridor only gives lip service to transit and rail options which are the only realistic response to perceived traffic delays. A 4 to 6-lane truckway, connecting to Red Bank, which may become 10 lanes, is the real "mode". It is widely understood that alternative transit modes are offered as a far less important option, for some far off future time – if the money is there. We note that highway proponents failed to remove the journalized route of old Relocated U.S. 50, now 45 years old – holding on to their hope of getting some highway in that corridor.

The DEIS's preferred alternative highway selection is obsolete today. It is antique. To build it would be wasteful, destructive and short sighted. Another highway is not our future. The DEIS should reflect that. It cannot be considered a serious proposal today. And any EIS purporting to show benefits and costs of this alternative cannot give a true picture unless it takes oil futures into account.

PART OF THE GREAT LAKES MID-ATLANTIC CORRIDOR?

The DEIS fails to acknowledge that the Eastern Corridor is an important link in what is known as I-73/74, the Great Lakes Mid-Atlantic Corridor (GL/MAC). This was one of five corridors of national priority in 1991. Documents state that this highway was to connect I-74 from Iowa, Illinois, Indiana to I-71 in Cincinnati to Red Bank Road to U.S 50 to SR 32 through the Little Miami Valley to Portsmouth. It would meet a new I-73 from Detroit (old U.S. 23) to Toledo to Portsmouth and together they would run through West Virginia, Virginia, North Carolina and end at the beaches in South Carolina.

It is also said that the three eastern states are proceeding with the upgrades of existing highways, among them U.S. 74, to make them Interstate quality and calling them I-74.

Being part of a huge national project like this may be used as an excuse to garner funding for the Route 32 improvements, as is the mention of "Appalachian Highway".

Although Cincinnati, the city, is listed as asking that SR 32 "not be established as an Interstate Highway", that provides no indication of intention. Either this is intended as a future link or it isn't. The DEIS should state the intention and either confirm or deny, stating the grounds therefor. *If this highway section is designed to be part of the GL/MAC, then the DEIS should cover the full environmental effect of the GL/MAC on the Little Miami Valley.*

Such a highway could easily bring another 50,000 vehicles per day through the Little Miami Valley, with the expected effects on gridlock on I-71 and I-75, gross air pollution, never-ending noise from an elevated highway in a valley, light all night every night, death to wildlife, disappearing birds and the other magnified negatives of an expanded Eastern Corridor through the valley.

A THREAT TO THE NATIONAL WILD AND SCENIC RIVER SYSTEM

The DEIS fails to note that a bridge where proposed over the river is at a point where the river moves considerably within its floodplain – 1000 feet over fifty years, several thousand feet since 1869. That means that without armoring the banks, which is not permitted, the river will eventually move to one of the piers, which will obstruct flow and reduce the values offered by the natural river.

If the bridge goes in, the river is damaged either by this obstruction or by armoring of the natural river banks in defiance of the law.

Thus the precedent of bridging the natural river will become a threat to all rivers in the system – if you can do it on the Little Miami, you can do it anywhere.

THE PUBLIC HEALTH

The DEIS would have us believe that if we greatly facilitate traffic flow in the Eastern Corridor, there will be *fewer vehicle miles per day traveled in the region.* Indeed, cars would move faster for awhile – 2 years? 3 years? Until the new, induced traffic filled up the road again. A very old story. And then what would become of the *present* gridlock on I-71? As a local highway engineer has said, “you can’t build your way out of gridlock”.

The DEIS should explain by what miracle mechanism the expanded highway system will reduce VMT and the resultant air pollution, noise, light, road salt, trash and automotive pollutants ending up in the river. Yes, it will temporarily reduce idling. Are the agencies and consultants ignoring induced traffic?

Should we the public accept the proposed ADT’s without certification by an independent reviewer? Note that the initial Eastern Corridor Study under OKI used different scenarios for “build” and “no build” in respect to rush hour durations – and different links furnishing traffic. They failed to take into account induced traffic. These oversights totally discredited that study. It took an independent reviewer to find these gross discrepancies, which completely changed the figures justifying the ”build” option.

The DEIS should acknowledge that the Eastern Corridor region *does not now meet air quality standards* for nitrogen and ozone – not only because of cars and trucks but because of power plants and industries. Adding a new highway system will only increase regional air pollution. In no way will the region meet the new 2.5 micron standards recently imposed. This is a serious omission by the DEIS. The EIS has the obligation to quantify the actual costs of premature deaths, health-care costs and lost workdays attributable to increased traffic in the region.

A recent study says that “about 460,000 people in Greater Cincinnati live in areas with high levels of diesel pollution, putting them at greater risk of developing asthma, cancer and other health problems related to breathing diesel fumes…”. The percentage of residents of Mariemont living in a “hot spot” is 55.4; for Cincinnatians there are 149,111.

According to Sierra Club, there are 24 scientific studies linking health risks with highway pollution, and the DEIS should acknowledge these studies or refute their association with the proposed highway system: We list the studies by their common names herewith and include the full citations as Appendix 1 of our comments:

1. Children Living Near Busy Roads More Likely to Develop Leukemia, Cancer
2. Road Traffic Contributes to the Origin of Childhood Leukemia
3. Increasing Public Transportation and Cutting Traffic Reduces Asthma Attacks
4. Soot Particulate Matter Linked to Lung Cancer, Cardiopulmonary Mortality
5. Truck Traffic Linked to Childhood Asthma Hospitalizations
6. Pregnant Women Who Live Near High Traffic Areas More Likely to Have Premature and Low Birth Weight Babies
7. Traffic Increased Cancer-Causing Pollution Levels at Tollbooths
8. Air Inside Cars Typically Contains More Dangerous Air Pollutants than Outside
9. People Who Live Near Freeways Exposed to 25 Times More Soot Particulate Pollution
10. Motor Vehicle Pollution Dominates Cancer Risk
11. Lung Function Reduced Among Children Living Near Truck Traffic
12. Traffic-Related Air Pollution Associated with Respiratory Symptoms in Two Year Old Children
13. Asthma Symptoms Caused by Truck Exhaust
14. Proximity of a Child’s Residence to Major Roads Linked to Hospital Admissions for Asthma
15. Exposure to Cancer-Causing Benzene Higher for Children Living Near High Traffic Areas
16. Air Pollution from Busy Roads Linked to Shorter Life Spans for Nearby Residents
17. Asthma More Common for Children Living Near Highways
18. Exposure to Nitrogen Dioxide (NO2) from Vehicles Exacerbates Asthma Attacks
19. A School’s Proximity to Highways Associated with Asthma Prevalence
20. Five Times More Deaths Due to Air Pollution than Traffic Accidents
21. Cancer Risk Higher Near Major Sources of Air Pollution, Including Highways
22. Diesel Exhaust Linked to Asthma
23. Low Levels of Air Pollution Cause Asthma Attacks
24. Motor Vehicle Air Toxins Cause High Pollution Levels Inside Homes

The message is: “Widening and building new highways is not only poor transportation policy but also threatens public health”.

The DEIS – the “E” and “I” stand for *environmental* and *impact* should include all 24 mentions and source references to the studies.

AUTOMOTIVE POLLUTION AND ROAD SALT

The DEIS should assess the effects of the large numbers of cars and trucks per day crossing the elevated highway over the floodplain, specifically respecting the precipitated exhaust gas and partially-burned fuel, plus leaking fuel, oil and antifreeze.

On average, road salt uses about 7 tons per lane-mile per season in this area. In a ten-mile stretch of 4 or 6-lane highway that would amount to 280 or 420 tons of salt per average season, falling or working its way onto the floodplain and its two major farms, with some going into the river, some percolating into the aquifer What then is the fate of this salt – what will be done with it and what will it do to the environment?

A PARKWAY?

On Page 3-8 : “Relocated SR 32 would be a multilane controlled-access parkway facility.

It can’t be when the heavy truck traffic on 32 is expected to be 1501 to 5000 trucks per day, the same as on I-275. The DEIS should remove mention of the parkway.

FLIGHT FROM URBAN CINCINNATI

The DEIS has not adequately described the impacts of the proposed highway on Cincinnati’s population drain, a longtime serious concern to the entire region. Projects of this kind are known to expedite flights beyond the suburbs, “sprawl” and would deprive Cincinnati of many of its most productive residents.

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Submitted by Mike Fremont, President Emeritus

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