

Denver League of Women Voters
Comments
Final Environmental Impact Statement
March 2, 2016

Over the past several years the League of Women Voters has voiced concerns about the proposed replacement of the I-70 East Viaduct with a below-grade highway – the “preferred option.” Our primary concern with CDOT’s preferred option has been the disruption of a diverse, low-income neighborhood when less disruptive options are available. Of all the alternatives the “no action” alternative, to simply replace the existing viaduct, is the least disruptive option.

In continuing to prefer the below-grade option CDOT has offered to find comparable housing for people whose homes are scheduled for demolition at a time when Denver’s stock of affordable housing is at an all time low. On page 5.2-34 of the FEIS CDOT states that the vacancy rate in Elyria was 8.1 percent in 2010 and that it might be possible for displaced people to remain in the neighborhood. That is not likely to be the case now.

There are literally thousands of people in the Denver metro area who have lost their homes due to increased rents and the lack of affordable housing. The directors of our shelters are experiencing increases in the homeless population of these economic refugees, including elderly people on fixed incomes, low-wage earners, and people who are part of the city’s workforce. The waiting lists are very long and there are many people who are in urgent need of housing. Unless these newly unhoused people are given emergency priority, they may face a prolonged period of homelessness.

Also of concern are the environmental impacts of CDOT’s preferred option. Under the preferred, below-grade option there is no adequate description of how the tons of toxic soil under the viaduct will be cleaned, or where the soil will eventually be taken. The assurance that best practices would be used to minimize the adverse effect of removing toxic soils is a partial answer, but not an explanation of how successful those practices can be expected to be.

The impact of the preferred option on the area’s waterways is also a concern. Pumping large amounts of contaminated water out of the highway into, eventually, the Platte is not only costly, it may be another promise that is more difficult to fulfill than CDOT anticipates. Similarly, the proposed drainage system which CDOT has agreed to pay for in part under its interagency agreement with Denver can only be expected to be a partial defense against flooding in this part of Denver. It also threatens another diverse low-income neighborhood, the Cole neighborhood, and one of Denver’s historic buildings in City Park.

Air quality is a major concern, both during construction and after. To make the case that it wouldn’t be any worse under the preferred option than would otherwise be the case, and that it might not exceed allowable standards under EPA requirements, is not reassuring. We agree with City Council members Ortega and New that the proposed mitigation for air quality under the preferred option, especially during construction, is not adequate. The Mayor’s Office of Sustainability, is seeking to reduce traffic volume and improve Denver’s air quality into the future. The “no action” alternative would force traffic into other traffic patterns during construction and perhaps afterwards as other options, such as the Fast Tracks network, become available and are increasingly used.

Health considerations are also of concern. CDOT has maintained that the highway may not be the primary cause of the higher incidence of asthma and cancer in Globeville-Swansea-Elyria. There certainly may be other contributing factors, but the reduction of traffic in this area could be expected to lead to improved health outcomes.

Finally, we continue to be concerned about the lack of transparency on CDOT's part and, also, their flawed approach to public outreach. A recent audit last fall disclosed that CDOT was unable or unwilling to disclose how some \$1.4 billion was spent. The intent to use a public-private partnership to finance the preferred option has also been questioned in that it obligates an unknown amount of state funds well into the future. In the only viable public hearing on the FEIS held in Denver on February 4th, the majority of speakers were strongly opposed to the preferred option and, has been the case in the past few years, to no avail.

CDOT, understandably, has the best interests of motorists in mind as well as the problems that heavy congestion holds for communities. As traffic congestion continues to increase in the metro area these problems can only become more acute for all of our neighborhoods and for the people who live in them. The proposed below-grade highway would address only a very small percentage of those problems at a great cost, financially, environmentally and in terms of livability in nearby neighborhoods. To impose so small an improvement to these wider problems on one small group of people who are among our most vulnerable residents is unjust and unjustifiable.