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Subtopic B2. Purpose and Need

Twenty-two public and agency comments were received on the B2: Purpose and Need subtopic. From those 22 comments, 8 common concern statements were developed. Themes in the B2: Purpose and Need subtopic include:

- Deficiencies in the purpose and need as expressed in the Draft PEIS
- The need to address mobility
- The use of flawed growth projections
- The need to incorporate a comprehensive statewide transportation network that includes other routes
- The designation of a short- or long-term planning horizon before identifying the NEPA Preferred Alternative and the Least Environmental Damaging Practicable Alternative
- Weighting of alternatives
- The identification of an acceptable level of congestion

CCS No.	NEPA Common Concern Statements (CCSs)
Subtopic B2: Purpose and Need	
B2-a	<p>Deficiencies in the Purpose and Need</p> <p>The purpose and need as expressed in the Draft Programmatic Environmental Impact Statement (PEIS):</p> <ul style="list-style-type: none"> • is based on accommodating growth while negating quality of life factors; • does not meet the purpose and the underlying need that preserves community values and environmental sensitivity of the Corridor; and • does not take into account Clear Creek County's community values.
B2-b	<p>Mobility</p> <p>The project purpose and need should be more comprehensive and address early action, construction period mobility, local Corridor mobility and access, and long-term transportation needs. For example, the PEIS should address mobility in the Mountain Corridor during the next 20 years, stressing the near-term need, in addition to mobility out to the limit of the design-life of the highway structures, as opposed to just mobility in the year 2025 as with the current Baseline standard analyzed in the Draft PEIS.</p>
B2-c	<p>Flawed Growth Projections</p> <p>The need for capacity improvements based on growth projections is flawed because these projections will not be realized. This has been borne out based on incorrect projections during the 1970s and 1980s. Transportation improvements are not warranted to support economic growth while negating environmental and community factors.</p>
B2-d	<p>Transportation Network</p> <p>The project purpose and need should be redefined to incorporate a comprehensive state transportation network that would consider other routes in addition to I-70.</p>
B2-e	<p>Short-Term/Long-Term Planning Horizon</p> <p>The purpose and need statement should be revised to designate a short-term or long-term planning horizon (2025 or beyond) prior to identification of the NEPA Preferred Alternative and the Section 404 Least Environmentally Damaging Practicable Alternative (LEDPA).</p>

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CCS No.	NEPA Common Concern Statements (CCSs)
B2-f	<p>Acceptable Level of Congestion</p> <p>The underlying need for the project is stated as increased capacity, improved accessibility and mobility, and decreased congestion. The need really seems to be to reduce congestion, particularly during weekends when demand is high, summer and winter. Including increased capacity in the need statement could exclude some opportunities for management options to reduce demand. The purpose and need statement should be clarified in the PEIS to say that it is not intended to exclude alternatives that increase capacity by decreasing the need or the vehicle miles traveled. Other points to consider include:</p> <ul style="list-style-type: none"> • The project purpose discussion does not provide any criteria against which the success of any specific alternative in reducing peak period congestion can be evaluated. In other words, what level of congestion is unacceptable and why, and how does each alternative attain an acceptable level of congestion? • The Draft PEIS does not present any modeling to show how travel demand management might reduce demand. A significant component of the travel demand is recreational non-work days and overnight winter and summer weekends. Therefore, incentives to manage this demand may reduce congestion and increase capacity. The Final PEIS should quantify the effects of a more robust travel demand management scenario on reducing existing and future peak demand, in both the short term and the long term. • The Draft PEIS dismisses the "Minimal Action" alternative as not meeting 2025 demand. Suppression of travel is only about 2%; and that is not severe enough to screen out the alternative.
B2-g	<p>Weighting of Alternatives</p> <p>The alternatives in the preferred grouping do not meet the purposes originally stated in the 1998 Major Investment Study (MIS). Therefore, CDOT has failed to act responsively to the public's desires regarding the preferred alternative when a consensus existed at the end of 1999.</p> <p>Furthermore, the alternatives in the preferred group do not meet the purposes documented in the Draft Programmatic Environmental Impact Statement (PEIS). For example, the text on page 2-126 stated that alternatives are to be selected based on which "best meet the underlying need while achieving purposes to varying degrees." Alternatives should both meet the need and achieve the purposes. Missing is weighting among the purposes and weighting between the need and purposes.</p>
B2-h	<p>Purpose Unfulfilled</p> <p>The Draft PEIS provides only one group of alternatives that specifically address the project need. As a result, the purpose is not fulfilled.</p>