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Subtopic B4. Grouping

Eighty-seven public and agency comments were received on the subtopic B4: Grouping. From those 87 comments, 8 common concern statements were developed. Recurrent themes from the B4: Grouping subtopic include:

- The grouping process was flawed because the alternatives that were evaluated covered different mileages and satisfied different travel capacity needs.
- The grouping process accounted for only capital cost and feasibility without considering construction options, safety, funding options, environmental sensitivity, geologic hazards, and community values.
- Evaluation criteria unfairly penalized the Transit alternatives and their elimination based on cost was short-sighted.
- There are concerns about the elimination of the Minimal Action alternative, as well as the Combination Six-Lane Highway with Diesel Bus in Guideway alternatives.
- Alternatives in the preferred group are both inadequate and inappropriate for Corridor communities because they have greater environmental impacts and are inconsistent with community values.
- The grouping process was biased in favor of Highway alternatives.
- The currently preferred group of alternatives appear to be the worst performing in meeting 2025 travel demand.
- The Draft PEIS did not describe how environmental resources and community values were used and balanced with technical feasibility and cost in the grouping process.

CCS No.	NEPA Common Concern Statements (CCSs)
Subtopic B4: Grouping	
B4-a	<p>Flaws in Grouping Process</p> <p>The Draft PEIS grouping process is flawed because the evaluated alternatives cover different mileages and satisfy different travel capacity needs (specifically noted is that the AGS and Rail alternatives far exceed the project needs).</p>
B4-b	<p>Inconsistency with NEPA</p> <p>The following concerns were noted about the grouping process presented in the Draft PEIS:</p> <ul style="list-style-type: none"> • The Draft PEIS grouping process considers only capital cost and feasibility, without adequately considering construction impacts, all funding options, safety, geologic hazards, environmental sensitivity, and community values. • The grouping process has been conducted too soon without the necessary supporting documentation and enough public input. • The grouping process does not consider a vision for Colorado's future. • The grouping process should not eliminate alternatives from consideration during Tier 1; it has eliminated alternatives that may become more attractive when further analysis is done during Tier 2. • A more comprehensive cost analysis should be completed before the Preferred Alternative is selected. • The grouping process does not meet NEPA and Federal Highway Administration (FHWA) requirements. • The Draft PEIS included an evaluation of all of the various alternatives even though it was acknowledged that there was no way the alternatives could be built within the \$4 billion cap.

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B4-c	<p>Issues with Specific Alternatives</p> <p>The following concerns were noted about the various alternatives:</p> <ul style="list-style-type: none"> • Mass transit alternatives were eliminated due to cost without consideration of environmental and economic impacts. A mass transit system (AGS, rail, dual-mode bus) would be an insightful, longer-term solution that would have fewer impacts on the environment, be better for the economy, and would meet our transportation needs and the majority’s vision for the future. Mass transit is a better solution than widening the highway. • The grouping criteria unfairly penalize the Transit alternatives. • The AGS and Rail alternatives should be moved into the preferred group and should be more fully explored before the Preferred Alternative is selected. • Rail alternatives can carry more people than automobiles and have a greater lifespan. Eliminating Rail alternatives due to cost is short-sighted. • AGS has fewer environmental impacts, maintenance issues, and construction impacts; AGS can generate revenue and is an environmentally “clean” alternative. • The Minimal Action alternative has been eliminated from the preferred grouping due to its inability to meet need, despite the fact that it only fails to meet peak travel demand. Its lower cost, fewer environmental impacts, and safety attributes should put it in the preferred category. <p>CDOT should be willing to take an innovative look at the situation, listen to the people of the state, consider community values, and choose technology to address the impacts on wildlife, lands, clean water, and air in the Corridor.</p>
B4-d	<p>Bias in Grouping Process</p> <p>The PEIS grouping process appears to be biased in favor of the Highway alternatives based on cost and because CDOT has stated they do not want to get into the transit business.</p>
B4-e	<p>Purpose and Need Not Balanced in Grouping Process</p> <p>The Draft PEIS lacks the following:</p> <ul style="list-style-type: none"> • A description of how environmental resources and community values are used and balanced with technical feasibility and cost in the alternative grouping process. • Documentation of NEPA scoping participation in the grouping process. • A fair display, comparison, and contrast of alternative tradeoffs, thereby not meeting NEPA requirements. <p>As a result, CDOT should re-evaluate the alternatives proposed for meeting the stated purpose and need. If this were done, the preferred grouping would change substantially.</p>
B4-f	<p>Inadequacy of Preferred Group of Alternatives</p> <p>Alternatives in the preferred group are inadequate and inappropriate for Corridor communities because they have greater environmental impacts and are not consistent with community values. There is a fundamental conflict between CDOT’s support for a widening alternative and the vision of the local communities for a less destructive alternative that will remedy problems at key chokepoints, while leaving Transit options available for the future.</p> <p>The following concerns were noted about the preferred group of alternatives:</p> <ul style="list-style-type: none"> • The preferred group of alternatives would have the greatest impacts on area residents, especially in Clear Creek County, reducing their quality of life during the construction period • The preferred group of alternatives do not meet the purpose (environmental sensitivity and community values) and need (transportation needs) for the project • The preferred group of alternatives are the least safe and least cost-effective. • The preferred group of alternatives would have the greatest impacts on historic resources. • The preferred group of alternatives address only short-term transportation solutions and do not consider a vision for Colorado’s future.

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B4-g	Inability to Meet 2025 Travel Demand The currently preferred group of alternatives appear to be the worst performing in meeting 2025 travel demand. If this is the case, why were these alternatives chosen when some of the others far exceed performance of the proposed alternatives? The identified life of the construction is 15 years. If the project was started today, it would end some time around 2020. Why would CDOT and FHWA use a metric that ties performance to a period of only 5 years beyond the completion of the project?
B4-h	Preservation Alternative The Combination Six-Lane Highway with Diesel Bus in Guideway – Build Transit and Preserve for Highway (Alternative 12a, Table 2-28) should be included in the preferred group of alternatives. The rationale for excluding Alternative 12a is not evident, given the defined thresholds listed in Chapter 2, Section 2.4.1.1.