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Subtopic B7: Cumulative

Twenty-three public and agency comments were submitted in relation to the B7: Cumulative subtopic. From those 23 comments, 17 common concern statements were created. Themes for the B7: Cumulative subtopic include:

- The analysis of cumulative impacts in the Draft PEIS was deficient and inadequate and did not meet NEPA, CEQ, or FHWA requirements.
- Cumulative impacts were not adequately discussed for fisheries, water resources, ecology, endangered species, traction sand, and visual resources.
- The PEIS should acknowledge that future impacts of highway development will result in cumulative impacts on social, cultural, and environmental resources in the Corridor.
- There was no consideration for the impacts of the Southern Access Road or the proposed Black Hawk Tunnel.
- There was no discussion of how planning might affect traffic levels and transportation needs along the Corridor.
- More in-depth discussion on the effect of the continued widening and expansion of the roadway needs to be provided to address the cumulative impact on historic properties.
- The Draft PEIS failed to acknowledge past impacts on the Georgetown-Silver Plume National Historic District, to consider changes in land use in evaluating cumulative impacts on historic properties, to discuss cumulative impacts on cultural resources as required by Section 106, and to evaluate the project's effects on the character-defining features of the historic setting of an individual resource or a historic district.
- Measures should be taken to rectify the cumulative impacts that would occur in the Georgetown-Silver Plume National Historic Landmark District.
- Adverse effects from both the current project and past construction in regard to the Idaho Springs National Historic District should be addressed in more detail.
- EPA requested that the Final PEIS identify and address strategies for dealing with growth impacts.

CCS No.	NEPA Common Concern Statements (CCSs)
Subtopic B7: Cumulative	
B7-a	Adequacy of Cumulative Impacts Analysis The cumulative impacts analysis is deficient for the following reasons: <ul style="list-style-type: none">• It depends on flawed information related to the direct and indirect impacts analysis.• It fails to use appropriate guidance, principles, and methodologies.• It does not use an integrative approach that combines the impacts on noise, recreation, environmental justice, and intangible values.• It does not go far enough in identifying other potential developments (other than improvements to I-70 itself) such as expansion of the skiing industry or recreation, that may in the long term affect the character of Corridor historic communities.• It does not address in enough depth the past impacts on communities, historic districts, and unincorporated lands in terms of cumulative impacts. More specifically, past impacts from initial I-70 construction are only dealt with qualitatively for natural resources, and therefore, cannot be compared to proposed development impacts.

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CCS No.	NEPA Common Concern Statements (CCSs)
B7-b	<p>Failure to Meet NEPA/CEQ/FHWA Requirements</p> <p>The cumulative impacts discussion in the Draft PEIS fails to meet NEPA/FHWA/CEQ requirements, as follows:</p> <ul style="list-style-type: none"> • It does not meet NEPA requirements for disclosure. • It fails to use appropriate guidance, principles, and methodologies. • It does not meet CEQ and FHWA requirements for the analysis and disclosure of cumulative effects by alternative because the No Action alternative is not included.
B7-c	<p>Impacts on Fisheries/Water Resources</p> <p>The Draft PEIS does not adequately discuss cumulative impacts on fisheries and water resources. The following concerns were identified:</p> <ul style="list-style-type: none"> • The cumulative impact analysis for water resources is too narrowly defined and should be expanded to include fishing and other recreational uses that have had substantial past losses. • Past impacts from initial I-70 construction are dealt with only qualitatively for fisheries and natural resources and, therefore, cannot be compared to proposed development impacts. • Cumulative impacts on fisheries and water resources occur outside the growth and development analysis approach and should not be downplayed based on induced growth and development impacts because some of the most serious impacts on fisheries and water resources can be attributed to I-70.
B7-d	<p>Inadequacy in Consideration of Ecology</p> <p>The Draft PEIS cumulative analysis is inadequate in consideration of ecology versus elements of ecology, given the following:</p> <ul style="list-style-type: none"> • The vast nonurbanized area involved • The complexity of ecosystems • The need for protection of ecological quality
B7-e	<p>Consideration of Endangered Species</p> <p>Cumulative impacts on endangered species occur outside the growth and development analysis approach and should not be downplayed based on induced growth and development impacts because some of the most serious impacts on endangered species can be attributed to I-70.</p>
B7-f	<p>Effects of Traction Sand Application</p> <p>Traction sand application has severely affected the Blue and Eagle River systems and must be considered in the cumulative impacts analysis in light of future impacts from sand application.</p>
B7-g	<p>Visual Impacts</p> <p>Cumulative impacts from planned development and possible induced growth were not considered in the analysis of visual impacts of the preferred group of alternatives.</p>
B7-h	<p>Effects on Social, Cultural, and Environmental Resources</p> <p>The PEIS should acknowledge that future impacts of highway development will probably result in significant cumulative impacts on social, cultural, and environmental resources in the region. The original highway caused impacts (development and growth) far beyond the immediate project area; therefore, proposed Highway alternatives would also have such impacts.</p>

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CCS No.	NEPA Common Concern Statements (CCSs)
B7-i	<p>Gaming Access</p> <p>The cumulative impact analysis does not consider the impacts of the Central City Parkway or the proposed Black Hawk Tunnel on Clear Creek County.</p>
B7-j	<p>Effects of Planned Development on Travel Demand</p> <p>The Draft PEIS cumulative analysis does not clarify the following:</p> <ul style="list-style-type: none"> • How much development is anticipated according to local/regional planning efforts for communities accessed by I-70 • How these plans may affect traffic levels and transportation needs along the Corridor
B7-k	<p>Impacts on Historic Districts</p> <p>The cumulative impact discussion on historic properties fails to acknowledge past impacts on the Georgetown-Silver Plume NHL District, and as a result, past impacts on historic districts should be addressed in more depth in terms of cumulative impacts. The PEIS must:</p> <ul style="list-style-type: none"> • include quantification of historic impacts compared to current likely impacts, and • display and contrast impacts to the total resource available
B7-l	<p>Historic Properties and Land Use</p> <p>Change in land use should be considered in evaluating cumulative impacts on historic properties.</p>
B7-m	<p>Section 106 Resources</p> <p>Chapter 4 of the Draft PEIS does not include a discussion regarding the cumulative effects on cultural resources as required under Section 106. Likewise, the Draft PEIS has not evaluated the project's effects on the character-defining features of the historic setting of an individual resource or a historic district.</p>
B7-n	<p>Georgetown-Silver Plume National Historic Landmark District</p> <p>Because cumulative impacts will occur within the Georgetown-Silver Plume NHL District, measures should be taken to rectify these cumulative impacts.</p>
B7-o	<p>Impact of Highway Widening and Expansion on Historic Properties</p> <p>The continued widening and expansion of the roadway will have a substantial cumulative impact on historic properties and needs to be addressed in more depth.</p>
B7-p	<p>Adverse Effects of Current Project</p> <p>Adverse effects of the current project, as well as those resulting from the original construction of I-70, with particular regard to the Idaho Springs National Historic District, should be taken into account when considering mitigation.</p>
B7-q	<p>Mitigation Strategies for Addressing Indirect and Cumulative Impacts</p> <p>The PEIS does a good job of addressing the indirect and cumulative environmental impacts from growth, which are significant for this project. Habitat fragmentation and additional impervious surfaces that would lead to potential wildlife and water quality impacts are analyzed in this document. EPA appreciates the comprehensive analysis done in the Draft PEIS on this issue and acknowledges that CDOT and FHWA were responding in part to EPA's requests for such analysis. However, strategies on how to deal with these impacts are missing from the document. The Final PEIS should address strategies to address these growth impacts on a programmatic level and for more specific Tier 2 analyses.</p>