

# DRAFT

## Subtopic F1: Wildlife

Twenty-nine public and agency comments were received on the F1: Wildlife subtopic. Those 29 comments generated the creation of 27 common concern statements. Themes for Subtopic F1: Wildlife include:

- There should be a strong commitment to research and build a diversity of wildlife crossings in certain specific areas.
- Additional noise and road maintenance would affect bighorn sheep populations, especially critical calving/lambing areas, and those impacts were not adequately discussed in the Draft PEIS.
- Animal-vehicle collisions should be kept to a minimum with wildlife fencing and data should be continually collected and factored into planning.
- The Draft PEIS should incorporate ALIVE Committee recommendations regardless of the chosen alternative.
- The Draft PEIS did not adequately address the impacts of fragmentation on wildlife.
- The Draft PEIS did not adequately address the impacts on threatened and endangered species, in particular the greenback cutthroat trout and the Canada lynx.
- Everything should be done to mitigate impacts on wildlife, including integrating the needs of wildlife into the initial stages of planning, incorporating CDOW recommendations, and building wildlife fencing.

CCS No.	Environmental Sensitivity Common Concern Statements (CCSs)
<b>Subtopic F1: Wildlife</b>	
<b>Wildlife Crossings</b>	
F1-a	The PEIS should acknowledge that the area near the Twin Tunnels is an important and frequently used passage for deer and other wildlife and that game trails are visible from the frontage road.
F1-b	The PEIS should state that crossing structures can assist birds and bats in safe passage across roadways.
F1-c	The PEIS should include well-researched information on crossing structure design and placement.
F1-d	The Final PEIS and the Record of Decision (ROD) should: <ul style="list-style-type: none"> <li>• stipulate a commitment to wildlife linkages,</li> <li>• identify the construction of proposed crossings as one of the highest financial priorities, and</li> <li>• include a detailed near-term and long-term implementation schedule.</li> </ul>
F1-e	Wildlife linkages should restore migration areas for elk, deer, and lynx to viable linkages rather than disrupting them further. Wildlife crossings should be placed at all appropriate locations, including the following: <ul style="list-style-type: none"> <li>• Dotsero</li> <li>• Wolcott</li> <li>• Vail Pass</li> <li>• Fall River (St. Mary's Glacier exit)</li> <li>• Over the top of the Twin Tunnels</li> <li>• Mount Vernon Canyon</li> <li>• Avon</li> </ul>

# DRAFT

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F1-f	<p>Because construction periods would likely increase the barrier effect of the I-70 Corridor as human disturbance and activity would interfere with natural behavior and movement patterns, the following should be considered:</p> <ul style="list-style-type: none"> <li>• The timing of construction along key migration corridors, as well as habitat linkage zones, should be scheduled to avoid interference with seasonal wildlife movements.</li> <li>• The construction of wildlife crossings that maximize the openness ratio should be analyzed. Wildlife crossings/linkages should               <ul style="list-style-type: none"> <li>• allow free movement of wildlife;</li> <li>• include a diversity of crossings, including span bridges, underpasses and overpasses, and at-grade and below-grade crossings for large mammals; and</li> <li>• be built now and extended later when the highway is widened.</li> </ul> </li> </ul>
<b>Bighorn Sheep</b>	
F1-g	<p>CDOW identifies the area west of I-70 north of Georgetown as a Production Area, Winter Concentration Area and Winter Range for bighorn sheep. Sheep Keep lands to the east of Dumont were designated to protect the lambing area of the bighorn sheep. I-70 has already caused significant bighorn sheep loss and habitat fragmentation. The PEIS ignored the impacts on life-cycle processes of bighorn sheep populations and did not disclose the impacts of noise and road maintenance activities on these areas. Of particular concern are lambing areas, habitat fragmentation, and roadside effects.</p>
<b>Animal-Vehicle Collisions</b>	
F1-h	<p>AVC data should be continually collected and factored into planning because roads can be a major cause of wildlife mortality.</p>
F1-i	<p>AVCs for diurnal and nocturnal raptors were stated incorrectly in the PEIS as negligible.</p>
<b>ALIVE</b>	
F1-j	<p>To add clarity and detail, the Final PEIS should include a full citation, information about the status, and details of the ALIVE Memorandum.</p>
F1-k	<p>The Draft PEIS stated incorrectly the ALIVE Committee's recommendations for crossing structures, which includes at-grade and above-grade structures in addition to below-grade structures.</p>
F1-l	<p>AVCs should be minimized with the inclusion in the PEIS of new wildlife fencing and measures to ensure that all new and existing fencing is maintained. The PEIS should incorporate the ALIVE Committee's recommendations for mitigation regardless of the chosen alternative.</p>
<b>Habitat Fragmentation and Barrier Effect</b>	
F1-m	<p>The more habitats are fragmented, the more wildlife populations are threatened.</p>
F1-n	<p>The Draft PEIS incorrectly states that no quantitative data exist regarding how a road's design regulates its barrier effect.</p>
F1-o	<p>The Draft PEIS inadequately addresses impacts on wildlife. I-70 has already caused significant wildlife loss and habitat fragmentation.</p> <p>Additionally, the secondary impacts of specific alternatives from induced growth need to be evaluated in terms of wildlife issues. If the long-term effects of induced growth of different alternatives on wildlife habitat are considered, the PEIS does not indicate what the effect will be.</p>
F1-p	<p>The Draft PEIS does not have enough detail about nontthreatened species such as ungulates. When it was constructed, I-70 cut a number of traditional migration routes.</p>
F1-q	<p>The Final PEIS should include additional scientific background information and research citations on wildlife fragmentation by roads to assist in decision-making (references included).</p>

## DRAFT

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F1-r	The Final PEIS should incorporate the latest information available on the barrier effect after consultation with Dodd and others.
<b>Roadkill Data</b>	
F1-s	The PEIS should cite CDOW roadkill data.
<b>Mitigation</b>	
F1-t	This PEIS presents the opportunity to mitigate impacts on wildlife. The PEIS should contain assurance that everything is being done to protect wildlife, and the needs of wildlife and habitats should be integrated in the initial stages of the development plans.
F1-u	The PEIS should incorporate CDOW recommendations in the initial stages in all long-range transportation plans.
F1-v	CDOT should explore the option of “protective buying” of private lands adjacent to the I-70 Corridor near wildlife linkage zones to ensure opportunities to restore wildlife linkages.
<b>Threatened and Endangered Species</b>	
F1-w	The Draft Programmatic Environmental Impact Statement (PEIS) does not adequately, or with enough specificity, address impacts on threatened and endangered species. The Federal Highway Administration (FHWA) will be required to conduct a consultation process under the Endangered Species Act for the greenback cutthroat trout and should do so at this programmatic (Tier 1) stage.
F1-x	The Draft PEIS does not adequately address impacts on the greenback cutthroat trout. <ul style="list-style-type: none"> <li>• The Draft PEIS does not adequately address whether, when, and how these cutthroat trout seasonally migrate between Dry Gulch and Clear Creek.</li> <li>• The Draft PEIS does remotely speculate how construction of any alternative, particularly the “preferred” alternatives will affect the greenback cutthroat trout. Dismissing alternatives that may have less impact on these populations without study and deferring any analysis to only the “preferred” alternatives in Tier 2 is inappropriate.</li> <li>• The Draft PEIS in Section 3.3 further indicates that “Data on acreages of disturbances of the habitats of the Colorado River and greenback cutthroat trout are available on the Impact Data Tables in Appendix A.” A review of Appendix A shows that no specific information is available and merely delays any analysis to Tier 2 studies. This is unacceptable.</li> </ul>
F1-y	The Draft PEIS does not address significant impacts of highway travel and operation on the Canada lynx or include appropriate mitigation in the alternatives.
F1-z	The PEIS should incorporate consideration of endangered species as a critical element of the decision-making process.
F1-zz	The PEIS should fully cite the Southern Rockies Wildlands Network Vision in the References.