

# DRAFT

## Subtopic F2: Water Quality – General

Thirty-five public and agency comments were submitted on the subtopic of F2: Water Quality – General. From these 35 comments, 15 common concern statements were developed. Themes to emerge for the F2: Water Quality General subtopic include:

- There are no assurances that impaired waters will not be impaired further and that best management practices/mitigation measures will be put in place to protect water quality.
- The Draft PEIS inadequately analyzes impacts on water resources, wetlands, other waters of the US, and riparian areas in relation to alternatives; does not discuss sources of stormwater funding; or identify the entities responsible for maintenance and best management practices.
- There are concerns about water supplies and how construction is going to affect those supplies, for example, the potential impacts on treatment costs for downstream water supplies, treatment plants, businesses, industries, and communities.
- The water in the Corridor is already contaminated, and the choice of alternatives being offered will create more pollution when less polluting alternatives, such as the AGS, are available.
- The AGS alternative would offer the best protection for the water resources used for public water supplies and wildlife habitat.
- The PEIS needs to identify the damage that would be done to the watershed from I-70 expansion.
- Issues that should have been addressed in Tier 1 have been deferred to Tier 2.
- Tier 2 studies need to include studies of the mobilization and fate of heavy metals from 23 mill sites and the transport of deicers.
- There needs to be a detailed analysis of stream channel impacts and mitigation measures by alternative, as well as examining storage and sedimentation issues for Georgetown Lake and runoff and flooding impacts on the Georgetown infrastructure.
- An individual stormwater permit should be prepared because Colorado's general construction stormwater permit may not be appropriate for the Corridor project based on its size, complexity, and location.

CCS No.	Environmental Sensitivity Common Concern Statements (CCSs)
<b>Subtopic F2: Water Quality – General</b>	
F 2-a	<p><b>Impaired Waters</b></p> <p>The Draft PEIS does not provide certainty that impaired waters along the Corridor will not be impaired further.</p>
F 2-b	<p><b>Mitigation Measures and Strategies</b></p> <p>The following concerns were noted about the Draft PEIS in relation to mitigation measures and strategies:</p> <ul style="list-style-type: none"> <li>• The Draft PEIS does not provide assurance that definite/specific BMPs and/or mitigation measures will be implemented to protect Corridor water quality. Specific water quality mitigation measures must be included as components of each alternative.</li> <li>• The Draft PEIS does not assure the public that there is adequate money to mitigate for water quality impacts or that CDOT will maintain permanent BMPs.</li> <li>• The Draft PEIS does not provide adequate mitigation strategies for the protection of Clear Creek during the construction period.</li> </ul> <p>The three most important items to maintain or improve water quality in the Corridor are as follows:</p> <ul style="list-style-type: none"> <li>• To minimize the footprint of the project</li> <li>• To minimize the changes in hydrology (or mimic natural systems as much as possible)</li> <li>• To reduce, minimize, or eliminate the impacts of winter maintenance activities</li> </ul>

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F2-c	<p><b>Stormwater Permit</b></p> <p>Colorado's general construction stormwater permit may not be appropriate for the I-70 Corridor due to the size, complexity, and location of the project. An individual stormwater permit for Corridor construction activities should be considered/prepared for inclusion in the Final PEIS.</p>
F2-d	<p><b>Stormwater Funding and Maintenance</b></p> <p>The Draft PEIS should include additional discussion related to the sources of stormwater funding and the entities responsible for stormwater system maintenance and BMPs.</p>
F2-e	<p><b>Potential Impacts on Water Supply</b></p> <p>The water resources section fails to address potential water quality impacts such as treatment costs for downstream water supplies, treatment plants, businesses, industries, and communities. For example, Clear Creek is a water supply source for a large population, and I-70 project alternatives would increase water quality impacts from sediment, phosphorus, and heavy metals, resulting in increased water treatment costs.</p>
F2-f	<p><b>Inadequacy of Alternative Analysis</b></p> <p>The Draft PEIS analysis of impacts on water resources, wetlands, other waters of the US, and riparian areas is deficient and results in an inadequate analysis of alternatives.</p>
F2-g	<p><b>Stream Channel Impacts</b></p> <p>Selection of an alternative cannot be made without a detailed analysis of stream channel impacts and mitigation measures by alternative (specifically noted are channel impacts on Clear Creek in the area of Silver Plume).</p>
F2-h	<p><b>Water Quality</b></p> <p>The following issues are of concern:</p> <ul style="list-style-type: none"> <li>• The Draft PEIS does not adequately address water quality considerations for the alternative selection process, specifically in light of stakeholder efforts to improve area water quality/stream quality. Water quality impacts must be fully understood at a regional level.</li> <li>• The Draft PEIS does not adequately address water quality impacts from maintenance activities or the release of heavy metals. Critical detailed studies of water quality impacts (evaluation of the effectiveness of existing BMPs and analysis of the eutrophication risk for possible impacts on lakes and reservoirs) and mitigation measures that will affect alternative selection are deferred to Tier 2.</li> </ul>
F2-i	<p><b>AGS Alternative</b></p> <p>The AGS alternative will best protect the Corridor's vital water resources that provide public water supplies and wildlife habitat.</p>
F2-j	<p><b>Adequacy of Selected Alternatives</b></p> <p>Corridor water is already contaminated, and CDOT is advocating alternatives associated with more cars that create more pollution, when less polluting alternatives are available. CDOT is proceeding toward selection of alternatives with the most significant impacts on water quality and drinking water.</p>
F2-k	<p><b>Runoff and Flooding Impacts on Georgetown</b></p> <p>The Draft PEIS does not address runoff and flooding impacts on the Georgetown infrastructure, which is already severely limited in terms of capacity and potential for improvements. Storage and sedimentation issues for Georgetown Lake have not been considered or addressed.</p>

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CCS No.	Environmental Sensitivity Common Concern Statements (CCSs)
F2-l	<p><b>Tier 2 Analysis</b></p> <p>The following should be considered for Tier 2 analysis:</p> <ul style="list-style-type: none"> <li>• Tier 2 analysis should include studies of the mobilization and fate of heavy metals from 23 historic mill sites and the fate and transport of deicers.</li> <li>• Tier 2 analyses should include further information about spill response and recovery within accident-prone areas and how water quality will be protected.</li> <li>• Tier 2 documents should include greater detail on avoidance and mitigation of hazardous waste and mine sites. Tier 2 documents should specifically describe plans for handling hazardous wastes, including the following: <ul style="list-style-type: none"> <li>• Contingency plans in case previously unidentified petroleum or hazardous substances are encountered</li> <li>• Other plans for hazardous spills or underground storage tanks</li> <li>• Provisions for hazardous waste containment in case of a spill</li> <li>• Collection and treatment of stormwater runoff in case of an accident or a spill</li> </ul> </li> </ul>
F2-m	<p><b>Watershed Damage</b></p> <p>The PEIS does not identify the damage that would be done to Clear Creek watershed from I-70 expansion.</p>
F2-n	<p><b>Maintenance and Construction Debris</b></p> <p>The Draft PEIS does not address highway maintenance and construction debris (such as old bridge pillars, chunks of concrete and asphalt, culverts, rebar, and pipes) in Clear Creek. Because CDOT has allowed this debris to routinely wind up in the river, this brings CDOT's commitment for mitigation during and after construction into question.</p>
F2-o	<p><b>Stream Alignment/Disturbance</b></p> <p>There are no assurances that Clear Creek will not be realigned again. Traditional cut-and-fill design and avoidance of elevated highways (except in Idaho Springs) has assured further significant environmental impacts on key streambeds in the Corridor. There should be aggressive design changes to relieve existing and potential constrictions to Clear Creek and other streams in the Corridor. The possible relocation of Clear Creek is a concern to Idaho Springs and other towns in Clear Creek County.</p>