

DRAFT

Subtopic F3: Water Quality – Winter Maintenance

Eighteen public and agency comments were submitted on the subtopic of F3: Water Quality – Winter Maintenance. From those 18 comments, 9 common concern statements were developed. Themes to emerge for the F3: Water Quality – Winter Maintenance subtopic include:

- The Draft PEIS does not adequately address how winter maintenance is going to affect communities; namely, vegetation, possible contamination of water supplies, and water quality.
- The effects of winter maintenance are greatest for the preferred alternatives in comparison to the other alternatives.
- The PEIS should identify/evaluate the fate and transport of chemical deicer and sediment into Corridor streams.
- Highway expansion will only add to the problems already associated with impaired streams in the Corridor.
- The Draft PEIS does not specifically identify or adequately describe the mitigation measures/policies that will be put in place.
- Quantifiable standards for sediment capture and removal should be established throughout the Corridor and a monitoring and reporting compliance system should be included.
- Ongoing sediment impacts from sanding operations continue to be a significant problem in the Corridor and the solutions being considered to date will not be 100 percent effective.

CCS No.	Environmental Sensitivity Common Concern Statements (CCSs)
Subtopic F3: Water Quality – Winter Maintenance	
F3-a	<p>Need for Quantification of Impacts</p> <p>The PEIS has not quantified the detailed impacts from winter maintenance activities; therefore, selection of an alternative is not possible until more information/evaluation is provided. The PEIS should identify an estimate of sediment recapture by alternative (according to the planned mitigation measures).</p>
F3-b	<p>Adequacy of Analysis</p> <p>The PEIS has not adequately addressed/evaluated the estimated tremendous increased use of sand and deicer, which is of great concern. The impacts of deicers on vegetation and water quality are not sufficiently analyzed.</p>
F3-c	<p>Fate and Transport of Deicer and Sediment</p> <p>The following concerns were expressed about the fate and transport of deicer and sediment:</p> <ul style="list-style-type: none"> • The PEIS should identify/evaluate the fate and transport of chemical deicer and sediment into Corridor streams. • A nonbiased study of magnesium chloride’s impact on the environment should be performed. • The Driscoll model does not capture water quality impacts over the long term; therefore, Tier 2 studies should address the long-term fate and transport of sediment.
F3-d	<p>Vegetation Impacts</p> <p>The impacts of deicers on vegetation are not sufficiently analyzed. Since the use of deicers such as magnesium chloride began on I-70, trees have been dying along the highway and additional deicer usage will make the problem worse.</p>
F3-e	<p>Contamination of Water Supplies</p> <p>Deicers can be transported to streams and groundwater and affect water supplies. The Draft PEIS shows that Highway alternatives will significantly increase winter maintenance impacts and, therefore, could contaminate water supplies that use Clear Creek as a source, including Silver Plume and Jefferson County.</p>

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F3-f	<p>Impaired Streams</p> <p>I-70 winter maintenance has caused impairment of Corridor streams, which has not been adequately addressed by CDOT. Highway expansion will only cause more problems to Corridor streams that are already impaired. For example, Straight Creek and Black Gore Creek are currently affected from I-70 sediment. Tons of salt and sand litter the sides of the road and are eventually transported to Black Lakes, Black Gore Creek, and Gore Creek. The Final PEIS should include assurances that these water bodies will not be further affected.</p>
F3-g	<p>Mitigation Measures</p> <p>The following concerns were expressed regarding mitigation measures:</p> <ul style="list-style-type: none"> • The Draft PEIS does not specifically identify or adequately describe mitigation measures/policies for deicers. • The Draft PEIS description of water quality mitigation measures is irresponsible and misleading. • The Draft PEIS indicates that mitigation measures would recover 25 to 80 percent of applied sand; therefore, I-70 project alternatives would still result in a steady influx of sediment to Corridor streams with adverse water quality impacts. More specifically, the Highway alternatives would inevitably have adverse impacts on water quality from winter maintenance activities, no matter how good the mitigation measures are for sediment. Meaningful quantifiable standards for sediment capture and removal should be established throughout the Corridor and include a monitoring and reporting compliance system.
F3-h	<p>Clear Creek</p> <p>The following were expressed as concerns in regard to Clear Creek:</p> <ul style="list-style-type: none"> • Corridor expansion will magnify water quality problems caused by winter maintenance operations and defeat efforts that have been made to restore the Clear Creek watershed to even a semblance of its original condition. • The Draft PEIS indicates that impacts from winter maintenance would be greatest for the preferred group of alternatives in comparison with other alternatives for the Clear Creek watershed.
F3-i	<p>Sediment Impacts from Sanding</p> <p>Although sediment control plans are being developed (or have been implemented) in some reaches along I-70, the NEPA document should disclose the fact that ongoing sediment impacts from sanding operations continue to pose a significant problem in the Corridor and that the solutions being considered to date will control only a portion of the problem. They will not be 100 percent effective.</p>