

DRAFT

Subtopic F6: Fisheries

Ten public and agency comments were submitted on the subtopic of F6: Fisheries. From those 10 comments, 6 common concern statements were developed. Topics ranged from the greenback cutthroat trout to recreational value to channelization to incomplete analysis provided in the Draft PEIS. Themes for the F6: Fisheries subtopic include:

- The Draft PEIS failed to discuss the greenback cutthroat trout in the endangered species section even though it is a federally listed species recently found in the headwaters of Clear Creek near the Eisenhower Tunnel.
- The Draft PEIS failed to address the value of Clear Creek as a popular recreational fishery.
- Additional channelization of Clear Creek will affect fish habitat.
- The Draft PEIS did not provide a complete analysis of the potential impacts on fisheries in terms of water quality degradation downstream in the numerous watersheds in the project area, and it did not adequately address mitigation.
- CDOT must develop a meaningful strategy for avoiding, minimizing, and mitigating impacts.
- The Draft PEIS did not adequately examine the effects on areas downstream of the construction activities.

CCS No.	Environmental Sensitivity Common Concern Statements (CCSs)
Subtopic F6: Fisheries	
F6-a	<p>Greenback Cutthroat Trout</p> <p>The discussion of endangered species does not include greenback cutthroat trout, the federally accredited species that was recently found in the headwater areas of Clear Creek close to the Eisenhower Tunnel. The Programmatic Environmental Impact Statement (PEIS) needs to address the presence of this federally listed species.</p> <p>CDOT terminated the Stream and Wetland Ecological Enhancement Program (SWEEP), which should have been in the PEIS.</p> <p>Clear Creek near Golden will soon become a protected fishery by the Colorado Division of Wildlife. Without protection to Clear Creek and other nearby watersheds during I-70 construction, CDOT is endangering a precious natural resource.</p>
F6-b	<p>Recreational Value of Clear Creek</p> <p>The PEIS needs to address the value of Clear Creek as a popular and productive recreational fishery.</p>
F6-c	<p>Channelization of Clear Creek</p> <p>Additional channelization of Clear Creek will affect fish habitat.</p>
Incomplete Analysis	
F6-d	<p>The PEIS analysis of impacts on fisheries is limited, raising the following concerns:</p> <ul style="list-style-type: none"> • The PEIS needs to provide a complete analysis of the potential to affect the fishery, especially in terms of water quality degradation downstream in numerous watersheds crossed by the project. • The analysis does not address the cumulative impacts of the proposed actions. For example, will any of the alternatives result in the increased use of winter treatments (for example, magnesium chloride) that could affect water quality over time in these watersheds? • The analysis of impacts on fisheries in the PEIS should be expanded to fully analyze the impacts on fisheries in the numerous watersheds this project crosses.

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CCS No.	Environmental Sensitivity Common Concern Statements (CCSs)
F6-e	<p>The following concerns involve the approach to mitigation presented in the PEIS:</p> <ul style="list-style-type: none"> • In Chapter 3, Section 3.5 of the Draft PEIS, Fisheries, the discussion in Section 3.5.3 and Table 3.5-16 uses the same logic that was used in Table 3.4-26. The language under mitigation for winter maintenance and stormwater runoff is virtually identical in both tables. This cookie cutter approach to mitigation shows a definite lack of thought into what would constitute adequate mitigation for fisheries and further reduces the credibility of CDOT to implement meaningful mitigation. • The Federal Highway Administration (FHWA) should require CDOT to reconstitute the SWEEP and develop an effective and fully funded plan for the entire I-70 Corridor, deferring publication of any final document until CDOT and its stakeholders develop a meaningful strategy for avoiding, minimizing, and mitigating impacts.
Extent of Impacts	
F6-f	<p>In Chapter 3, Section 3.5.2.1 of the Draft PEIS, which discussed direct impacts on fisheries, statements are made that the impacts resulting from the degradation of water quality, disturbance of habitat and trout spawning areas are limited to areas “immediately downstream from construction activities” and “Acres of disturbance in a 200-foot sensitivity area.” The very nature of high-gradient streams and their ability to transport sediment means that these impacts will affect streams far beyond these limited zones of consideration.</p> <p>The following examples are offered:</p> <ul style="list-style-type: none"> • The high-quality fishery of the Blue River and Gore Creek has been seriously degraded by current activities as far downstream as Green Mountain Reservoir and throughout Vail, beyond the 200-foot “sensitivity area.” • Traction sand is also moving from Black Gore Creek and Gore Creek into the Eagle River, well downstream of the Sediment Control Action Plan (SCAP) limits, creating a situation that the proposed mitigation by application of the SCAP has inadequately dealt with.