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Subtopic G5: EJ

Nineteen public and agency comments were submitted on the subtopic of G5: Environmental Justice. From those 19 comments, 13 common concern statements were developed. Themes associated with G5: EJ include:

- There were concerns about the data used to establish the median income of Silver Plume. If using a recent DOLA survey, Silver Plume would be considered an EJ population.
- Compared to other Corridor communities, Silver Plume has the highest incidence of poverty, with a large portion of those households near the highway.
- A windshield survey indicated the poorest housing in Clear Creek County and Silver Plume is located next to the highway.
- Minority population figures are incorrect.
- There are concerns about the displacement of long-term residents and the impact on the elderly and persons under the age of 18, with the possibility of these groups suffering disproportionately high impact.
- Homes in Silver Plume along Madison and Water Streets would be uninhabitable as a result of the impact from noise, air pollution, and roadway shadowing.
- All of the adverse impacts of highway widening will occur in Clear Creek County, with the greatest impact being in Silver Plume. Highway widening will also affect affordable housing in Idaho Springs and Silver Plume because there is limited room in the valley to build alternative housing for the elderly and low-income populations.
- The PEIS does not support its conclusion that low-income and minority populations are not disproportionately affected by the project.
- Silver Plume officials were not included in addressing EJ concerns while the Draft PEIS was being prepared.
- The Draft PEIS does not provide evidence that there was outreach to EJ populations and that EJ populations were involved in making decisions.
- The EJ analysis is supposed to occur as early in the project as possible; therefore, EJ analysis cannot wait until Tier 2 because many of the alternatives that would most effectively address EJ issues will have been eliminated.

| CCS No. | Community Values Common Concern Statements (CCSs) |
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| Subtopic G5: Environmental Justice | |
| Identification of Low-Income Populations | |
| G5-a | Silver Plume has the highest incidence of poverty in the entire Corridor. Documentation is available for the town of Silver Plume to supplement the income data presented in the Draft PEIS. 2000 Census data indicated a median income of \$35,208 in Silver Plume, and 27 percent of the households were considered low income. A recent Colorado Department of Local Affairs (DOLA) survey indicated 54 percent of the households had an income less than the median income of \$24,000 and should, therefore, be considered an environmental justice population. The percentage of households with low income should be based on the per capita income of the town of Silver Plume, not the median income for Clear Creek County. |
| G5-b | A windshield survey reveals that much of the poorest housing in Clear Creek County and Silver Plume (presumably containing some of the poorest households) is located nearest to I-70, and that adverse impacts would be at their worst in Silver Plume. |

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| G5-c | EPA Region 8 methods for identifying low-income and minority populations would have included more communities, such as those that are not adjacent to I-70 but would be affected by the project. Any community or area with a minority population above the state average merits additional attention as an environmental justice community. |
| Identification of Minority Populations | |
| G5-d | The 2000 Census data indicate a high percentage of Hispanic populations in Carbondale (32 percent) and Silt (84 percent). These populations constitute a specific area in the community and are not dispersed throughout the community as stated in the PEIS. |
| Impacts on Low-Income and Minority Populations | |
| G5-e | Virtually all of the adverse impacts from highway widening will occur in Clear Creek County and will be at the worst in Silver Plume. These adverse impacts include air pollution, noise pollution, highway shadowing, and impairment to the character and feeling of a historic mining town. |
| G5-f | The Highway alternatives will result in the taking of homes along Madison Avenue and Water Street in Silver Plume, and even if they remain untaken, the impact resulting from noise, air pollution, and roadway shadowing due to highway widening will make these homes uninhabitable. The impact on the elderly and low income may not be redeemable due to the limited room in the valley to build affordable housing. |
| G5-g | Clear Creek County has one lumberyard, one pharmacy, and one supermarket all within 25 yards of I-70. The town of Idaho Springs is dependent on these revenues, and many of the elderly and low-income populations have limited ability to travel outside the county for services. |
| Disproportionate Impacts on Low-Income and Minority Populations | |
| G5-h | The PEIS does not address disproportionate impacts at the regional or local level. At the regional level, beneficiaries of the project in Summit and Eagle counties who stand to benefit the most from the project are far better off economically than those in Silver Plume and Clear Creek County who receive the greatest burden from the project and are in the poorest county in the Corridor. At the local level, the incidence of poverty is often a function of distance from the highway. |
| G5-i | The PEIS does not support the conclusion that low-income and minority populations are not disproportionately affected by the project. The impact on low-income and non-low-income in Silver Plume may be the same, but this is not true when you compare these impacts to other communities in the Corridor. |
| G5-j | The project benefits those who travel on weekends for recreational purposes more than it does the traveler during off-peak travel times that have fairly average demographics. Low-income and minority populations will receive fewer benefits from a car-only system than will a non-low-income and minority population. |
| Public Involvement | |
| G5-k | The PEIS does not provide evidence of its outreach program with the environmental justice population and their involvement in the decision-making process. Silver Plume officials have not been included in addressing environmental justice concerns during preparation of the Draft PEIS. |
| Tier 2 Analyses | |
| G5-l | Environmental justice analysis can directly affect the choices made at Tier 1 and must occur as early as possible in the process of scoping a project and narrowing the alternatives. The analysis cannot wait until Tier 2. The AGS alternative, which is most likely to address environmental justice issues, will already have been eliminated. |
| G5-m | CDOT must establish more rigorous procedures to engage the minority and low-income communities in Tier 2 analysis. |