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Subtopic G9: Historic Resources

Sixty-eight public and agency comments were received on the G9: Historic Resources subtopic. From those 68 comments, 26 common concern statements were developed. Themes for the G9: Historic Resources subtopic include:

- Because Clear Creek County was named as one of Colorado's most endangered places in 2005, the county's remaining historic sites should be preserved at all costs.
- There are concerns about how this project will affect heritage tourism in the area, particularly in towns like Idaho Springs, where local economies could be affected or even destroyed.
- The Revised Reconnaissance Survey should be provided to the public.
- There should be a complete review of Section 106 concerns before the preferred alternative is selected.
- Noise and vibration effects on historic properties must be discussed.
- Both the process and results of the Section 110 consultation should be described.
- CDOT and FHWA must complete an analysis of relative effects on historic properties to comply with Section 106 regulations.
- There is the need for a historic context study during Tier 2 to research individual sites.
- The Tier 1 APE should be maintained for Tier 2.
- The visual analysis should focus on impacts that diminish the integrity of historic properties.
- Visual impacts on historic properties resulting from the widening alternatives and the mitigation of noise impacts were incorrectly considered in the alternatives analysis.
- The metrics that were used to analyze noise impacts on historic properties were inappropriate and did not consider the uses and National Register/National Historic Landmark characteristics of these properties.
- Mitigation of noise impacts would result in visual impacts and impacts on historic property settings.
- The Draft PEIS did not discuss the impacts of blasting, excessive noise, potential construction zone takings, or the economic impact on heritage tourism in Clear Creek County.
- Indirect impacts such as noise impacts, visual impacts, induced growth, and sprawl could negatively or adversely affect historic communities.
- The Section 106 consultation process was flawed.
- Land use changes and their effects on historic properties were not analyzed.
- The Draft PEIS did not clearly summarize the effects of alternatives on historic properties or cultural resources.
- Mass transit alternatives would have the least impact on historic properties in Clear Creek County, while those that would widen the highway would have the greatest impacts, specifically in Idaho Springs and the Georgetown-Silver Plume National Historic Landmark District.
- Elevated travel lanes in Idaho Springs would introduce a new intrusive element to the landscape.

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CSS No.	Community Values Common Concern Statements
Subtopic G9: Historic Resources	
G9-a	<p>Degree of Impacts</p> <p>The mass transit alternatives will have the least impact on historic properties in Clear Creek County. The alternatives involving the expansion of I-70 to a six-lane highway will have the greatest impact on historic properties in the county, and specifically in Idaho Springs and the Georgetown-Silver Plume National Historic Landmark District.</p>
G9-b	<p>Revised Reconnaissance Survey</p> <p>There is a need to provide the Revised Reconnaissance Survey to the public.</p>
G9-c	<p>Consideration of Impacts Deferred to Tier 2</p> <p>Impacts on historic properties were not considered in the Tier 1 alternatives analysis. Rather, consideration of these impacts in terms of Section 106 and Section 4(f) has been deferred to Tier 2.</p>
G9-d	<p>Relative Effects Analysis</p> <p>An analysis of relative effects on historic properties has not been performed as required under 36 CFR 800.5. FHWA, and CDOT must complete this assessment to comply with the Section 106 regulation.</p>
G9-e	<p>Heritage Tourism</p> <p>Corridor communities are concerned about the impacts of the project on heritage tourism, which is the backbone of the local economy. Towns like Idaho Springs whose main business is historical properties could be destroyed because that history will need to be destroyed to expand the highway.</p>
G9-f	<p>Indirect Effects</p> <p>Indirect effects, such as noise and visual impacts, induced growth and associated sprawl development, and economic effects, will negatively or adversely affect historic communities in the Corridor.</p>
G9-g	<p>Elevated Travel Lanes</p> <p>For the two highway widening alternatives, the Draft PEIS shows three elevated travel lanes looming over Idaho Springs and introduces an extraordinarily intrusive new element into the landscape and between downtown and the canyon wall.</p>
G9-h	<p>Complete Section 106 Review Needed</p> <p>A complete review of Section 106 concerns (physical, noise, visual, cumulative and construction) is requested to be conducted prior to selection of the preferred alternative for the Record of Decision.</p>
G9-i	<p>Evaluation of Relative Effects</p> <p>The primary question in evaluating historic setting under Section 106 is whether the project significantly diminishes the character-defining features of the historic settings of an individual resource or a historic district. A Section 106 evaluation of the relative effects should be completed.</p>
G9-j	<p>Historic Property Identification</p> <p>The identification of historic properties within the project's area of potential effect (APE) has not been completed. This study must be completed to evaluate alternatives.</p> <p>Respondents request additional inventory and eligibility determinations for properties in the valley, including Silver Plume, as well as the Graymont/Bakerville area, in the PEIS or prior to completion of Tier 2 and some ask for commitment in the Programmatic Agreement.</p>
G9-k	<p>Clear Creek County</p> <p>Because Clear Creek County has been identified on Colorado's Most Endangered Places List in 2005, the county's remaining historic sites should be preserved at all costs.</p>
G9-l	<p>Area of Potential Effect</p> <p>The Tier 1 APE should be maintained for Tier 2.</p>

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G9-m	<p>Need for Historic Context Study</p> <p>During Tier 2, but before any final Tier 2 actions, an appropriate historic context should be written for the Tier 2 undertakings, and individual sites, including mining sites, should be researched. A commitment to develop this historic context and perform these site studies should be stipulated in the Programmatic Agreement.</p>
G9-n	<p>Visual Analysis</p> <p>Under Section 106, visual analysis must focus on impacts that diminish the integrity of the historic setting.</p>
G9-o	<p>Noise Mitigation and Visual Impacts</p> <p>The mitigation of noise impacts will result in visual impacts as well as impacts on the settings of historic properties.</p>
G9-p	<p>Limited Discussion of Construction Impacts</p> <p>The limited discussion of construction impacts on historic properties does not include impacts of blasting, excessive noise, potential construction zone takings, or the economic impact on heritage tourism in Clear Creek County.</p>
G9-q	<p>Noise Metrics for Historic Properties</p> <p>The metrics used to analyze noise impacts on historic properties, including the Georgetown-Silver Plume NHL, were not appropriate. These metrics do not take into account the uses and National Register/National Historic Landmark characteristics of these properties. Further, mechanisms for mitigating noise impacts in the area of these properties (that is, noise walls) would result in visual impacts on these historic properties.</p>
G9-r	<p>Visual Impacts on Historic Properties</p> <p>Visual impacts on historic properties resulting from the widening alternatives and mitigation of noise impacts (that is, noise walls) were incorrectly considered in the alternatives analysis.</p>
G9-s	<p>Disclosure of Noise Effects</p> <p>There is a need for discussion of noise and vibration effects on historic properties under Section 106, rather than use of NEPA (FHWA noise guidelines) to carry the PEIS discussion. There has been no disclosure of noise effects under Section 106.</p>
G9-t	<p>Flawed Section 106 Consultation</p> <p>The Section 106 consultation process is seriously flawed within the PEIS, and alternatives were eliminated within Tier 1 without full knowledge of the potential direct effects on historic properties and character; noise and visual effects have been minimized.</p>
G9-u	<p>Land Use Changes</p> <p>An analysis of land use changes (indirect impacts) and the relative effects of these changes on historic properties has not been performed as required under Section 106.</p>
G9-v	<p>Section 110 Consultation</p> <p>Both the process and results of the Section 110 consultation should be described. Additionally, is there a Section 110 agreement that details the efforts to avoid and minimize harm within the Landmark?</p>
G9-w	<p>Summary of Effects Needed</p> <p>The PEIS needs a clear summary of effects of alternatives on historic properties or cultural resources.</p>

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G9-x	Noise Standards The noise standards for Section 106 and NEPA differ. CDOT has chosen 66 decibels, an FHWA/NEPA Activity Level B, as a standard for noise in the District. Under Section 106, a noise level that does not diminish the quality of the resource is determined through consultation. That consultation has not taken place. Even under NEPA, however, Table 3.12.2 in Section 3.12 of the Draft PEIS shows that areas where a level of serenity is important to the purpose of the place should have an Activity Level A of 56 decibels. The Landmark District is dependent on heritage tourism and outdoor recreation. A group walking tour cannot be conducted with surrounding noise at a 66 decibel level. The town of Georgetown would submit that Activity Level A is more appropriate to the District. The only mitigation suggested for noise is sound walls, which add visual intrusion.
G9-y	Visual Assessment Methodology Chapter 3, Section 3.13 of the Draft PEIS examines two aspects of visual effects: visual contrast (a change in height, color, and texture) and scenic views. These are two aspects of the visual effects; however, with only these criteria, a 10-lane highway on grade with 4-foot concrete Jersey barriers would have less visual effect than a finely designed guideway. Under those guidelines, the Glenwood Canyon highway and the “picture bridge” could never have been built. Although it is not directly stated, it is presumed that vertical contrast is inherently negative and should be avoided. Indeed, the mitigation in Section 3.13 of the Draft PEIS recommends using structures with a horizontal emphasis. Section 106 review of visual effects concentrates on effects that diminish the integrity of the historic setting.
G9-z	Motorists’ View The discussion of view in the PEIS is limited to the motorists’ view of the landscape and the view of the road from adjacent properties. The most common view, with the greatest visual impact, is not included: the motorists’ view of the road itself.