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Subtopic i1: Mitigation – General

Twenty-seven public and agency comments were received on the i1: Mitigation – General subtopic. From those 27 comments, 9 common concern statements were created. Themes to emerge from the i1: Mitigation – General subtopic include:

- Mitigation strategies in the Draft PEIS were unclear and contradictory, with policies that were too general and no discussion of mitigation of cumulative impacts.
- The Draft PEIS assumed that historic properties and mine tailings could be mitigated after construction.
- Mitigation should be analyzed during Tier 1 because mitigation measures can affect capital costs and economic reasonableness of alternatives. Waiting until Tier 2 makes it impossible to understand the implications of the alternatives.
- The Town of Silver Plume requests to be involved in the planning associated with the expansion of I-70 through the town.
- The City of Idaho Springs requests that CDOT and FHWA commit to and incorporate specific provisions, such as not permitting noise effects to exceed federal or state standards within the city limits, avoiding impacts on the historic district, designing and constructing street and parking capacity improvements and bypass routes at no cost to the city, to name a few.
- Mitigation measures should address incomplete or inadequate mitigation of past or current construction impacts of I-70 in conjunction with any I-70 improvements.
- Context sensitive design should be used for all portions of the Corridor and local communities should be involved in developing these designs.
- Every effort should be made to include plans that are reasonably feasible in minimizing or mitigating the amount of noise and pollution that will affect Corridor communities, such as diverting traffic, building high earthen berms, selecting alternatives that would minimize vehicles, noise, and pollution, and so forth.

CCS No.	Mitigation Common Concern Statements (CCSs)
Subtopic i1: Mitigation – General	
i1-a	Unclear Mitigation Strategies The PEIS lacks clear identification of mitigation strategies. The policies are too generalized to discriminate between alternatives, to determine how and where mitigation will be implemented, and whether it will be effective. Where mitigation is identified, it is qualified by affordability. The PEIS does not address mitigation of cumulative impacts.

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i1-b	<p>Context Sensitive Design/Contradictory Discussions</p> <p>One section indicates that noise mitigation could include horizontal and vertical alignment shifts. Another section indicates they are too expensive. Mitigation policies reference standard design except in isolated instances, and then indicate that context sensitive design will be used. Context sensitive design should be used for all portions of the 150-mile route. Local committees should be involved in developing these designs.</p> <p>Design of sensitive areas is not, but should be, identified. Innovative design might address many environmental and community issues.</p> <p>The wildlife mitigation indicates that the wildlife crossings will be constructed in keeping with the ALIVE (A Landscape level Inventory of Valued Ecosystem components) agreement. In the chart for specific wildlife mitigations, however, crossings will be constructed “if practical.”</p> <p>The Landmark District was not identified in the mitigation sections as a uniquely sensitive area, but the commitment to follow a Section 106 Programmatic Agreement (PA) in the face of policies to only vary standard design in isolated instances does not avoid or minimize harm to the Landmark District. The mitigation section indicates that detailed planning is already complete for Georgetown and Silver Plume. Tunnels were eliminated, and horizontal and vertical realignments that could mitigate noise were deemed too expensive. Yet the mitigation policy encourages interested parties to develop and evaluate designs that would represent an affected community’s ideal of aesthetically pleasing infrastructure.</p>
i1-c	<p>False Assumption</p> <p>The Draft PEIS falsely assumes that historic properties and mine tailings can be mitigated after the impairment of construction.</p>
i1-d	<p>Misleading Information</p> <p>Using a percentage for mitigation with each alternative (when they are all very different) is misleading.</p>
i1-e	<p>Tier 1 versus Tier 2</p> <p>Mitigation analysis should be done during Tier 1 because mitigation measures could greatly impact capital costs and the economic reasonableness of alternatives. Leaving the analysis to Tier 2 makes it impossible to understand the implications of the alternatives.</p>
i1-f	<p>Town of Silver Plume Involvement</p> <p>Mitigation of adverse affects associated with the expansion of I-70 through Silver Plume must be carefully planned. The town of Silver Plume requests that the municipality be included in this planning.</p>
i1-g	<p>Options for Minimizing/Mitigating Noise and Pollution</p> <p>Plans to accommodate significant additional traffic volume on I-70 should do as much as is reasonably feasible to minimize or mitigate the amount of additional noise and pollution that will affect communities. This could be done by (1) selecting alternatives such as the monorail or the fixed guideway system which would minimize vehicles, noise, and pollution; (2) using quiet and otherwise environmentally friendly buses for some of the traffic; (3) diverting traffic to other routes; (4) building high earthen berms (NOT concrete barriers) and planting appropriate vegetation along the sides of the roadway; or (5) some combination of these alternatives.</p>
i1-h	<p>Mitigation Measures That Address Past or Current Impacts</p> <p>Mitigation measures should address incomplete or inadequate mitigation of past or current impacts of construction and operation of I-70 prior to, or in conjunction with, any I-70 improvements.</p>

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CCS No.	Mitigation Common Concern Statements (CCSs)
i1-i	<p data-bbox="321 300 846 323">Need for Inclusion of Mitigation Commitments</p> <p data-bbox="321 331 1511 386">The City of Idaho Springs requests that CDOT and FHWA commit to the following provisions and that the following mitigation commitments be incorporated into these decision documents:</p> <ul data-bbox="321 394 1533 856" style="list-style-type: none"><li data-bbox="321 394 1487 449">• Loss or significant degradation of key wildlife habitat or wildlife crossings will be replaced on a 1 to 1 acre and/or functional value basis.<li data-bbox="321 466 1484 520">• Noise effects will not be permitted to exceed either federal or state standards within the City of Idaho Springs city limits.<li data-bbox="321 537 1492 642">• Concentrations of regulated water quality parameters, particularly zinc, copper, cadmium, and manganese, will not be permitted to exceed either federal or state standards for designated beneficial uses in Clear Creek within the upper Clear Creek watershed and within the City of Idaho Springs city limits.<li data-bbox="321 659 1523 714">• Existing recreational facilities lost or significantly degraded by the Preferred Alternative will be replaced in-kind at no cost to the City of Idaho Springs.<li data-bbox="321 730 873 753">• Impacts on the Historic District will be avoided.<li data-bbox="321 770 1533 856">• Street and parking capacity improvements and bypass routes which increase transit traffic or are needed during construction periods to accommodate traffic detours of the Preferred Alternative will be designed and constructed at no cost to the City of Idaho Springs.