



Clear Creek County

POST OFFICE BOX 2000
GEORGETOWN, COLORADO 80444

TELEPHONE: (303) 569-3251 • (303) 679-2300

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Benjamin Acimovic, P.E.
Resident Engineer
I-70 Mountain Corridor Program
CDOT Region 1
425 A Corporate Circle
Golden, Co 80401

David Singer
Environmental Program Manager
I-70 Mountain Corridor Program
CDOT Region 1
425B Corporate Circle, Suite 201
Golden, CO 80401

Re: Clear Creek County Comments to the I-70 Traffic & Revenue Level 1: Alternative Evaluation

Dear Ben and David,

The Commissioners agree with the recommendation of the Traffic & Revenue Study for the I-70 Corridor that none of the alternatives should move forward to Level II studies. Significant work is underway in the corridor at this time and, in keeping with the adaptive management strategy adopted in the Record of Decision (ROD), we believe that the results of present efforts should be weighed prior to moving forward in the future.

The unknown future of the use and application of this study is of concern to Clear Creek County. In that regard we request that the recommendation and study summary clearly reflect the deliberations of the PLT/TT including the lack of consensus on the evaluation of alternatives. We request that the final sentence of the recommendation be revised to read: "Preliminary design, cost estimates, modeling data and CSS Performance Criteria and Matrix, with stakeholder comments, produced as part of Level 1 will provide updated documentation for upcoming I 70 initiatives."

Clear Creek County has significant areas of disagreement with the ratings in the evaluation matrix. We request that these comments accompany the matrix in the final report of the project. The County's main concerns include the following areas: incident response, AGS accommodation, adherence to CSS design criteria and aesthetic guidelines, public input to the decision making process, and protection of cultural and natural environment. This is not an exhaustive list. Our specific comments are as follows:

- Incident Response and Responder Safety (Matrix Performance Measures 3 and 9): Clear Creek County EMS and Fire Authority are the major responders in the area with over 1000 I-70 related calls annually. These agencies were never contacted directly by consultants in regard to emergency responder needs. The agencies report grave concerns with Alternatives 1 and 2 as a double set of jersey barriers the full length of Clear Creek County seriously impedes the mobility,

flexibility and access of emergency vehicles. The recommendation is to rate Alternatives 1 and 2 as “poor”, not “good” in Measures 3 and 9. In all cases, the affected services should be consulted prior to rating.

- AGS Accommodation (Matrix Performance Measures 11 and 15): The AGS study clearly stated that the AGS technologies suitable for the corridor would require a flexibility to move in and out of the ROW. If the highway expansion takes the full ROW, AGS cannot be accommodated nor would it be feasible if an alternative introduced a different transit in a dedicated space that could not be used by the AGS. It is our recommendation that Measure 11 state that AGS cannot be accommodated in Alternatives 1 and 2. The statement in Measure 15 that “It is estimated that the AGS would have substantial effects on natural resources” is also of concern. It is not clear how that conclusion was reached. Substantial examination of how natural resources will be impacted will be necessary in the future.
- Adherence to CSS Design Criteria and Aesthetic Guidelines (Matrix Performance Measures 13 and 14): The rating of all alternatives as “fair” in Measures 13 and 14 makes the assumption that all are the same in adherence to the criteria and guidelines. They are not all the same. The argument that the most extensive construction provides the best way to be in context with the surrounding environment represents a basic misunderstanding of the meaning and use of the criteria and guidelines. They are not based on scale of effort but rather visual impact of result and intended to be evaluated in the design process, not as mitigations or enhancements. These tools are primary to CSS and committed to in the ROD. Clear Creek County recommends that measures 13 and 14 clearly indicate that an adequate review of alternatives, in relationship to these tools, has only taken place for Alternative 6. Alternatives 1, 2 and 4 will have substantial design challenges to accommodate these commitments. Further, the CSS tools are intended to assist in the protection of the environment. There is a logical disconnect in the rationale for Measure 13 which states, the “greater the opportunity for construction, the greater the opportunity to apply the CSS criteria” and the rationale for Measure 23 which states, “alternatives with a wider footprint have more potential to impact historic resources” and the rationale for Measure 25 which states, “Alternatives 1 and 2 have no median and the most number of lanes, there would be more potential for impacts that cannot be mitigated”.
- Public Input to the Decision Making Process (Matrix Performance Measure 20): The initial text of Measure 20 referred to “a minimal risk of public or political opposition.” It was recommended by the PLT/TT that “legal action” be added to the list, not that it supplant the terms “public and political opposition.” It is recommended that the original text for Measure 20 be restored so Measure 20 reads: “Does the Alternative have a minimal risk of public, political, or legal opposition?”
- Protection of the Cultural and Natural Environment (Matrix Performance Measures 23, 24, and 25): The rationale for Measure 24 that improving access actually enhances historic districts is not balanced when noise, pollution, and visual clutter are dramatically increased. Sometimes difficulty of access is the last protection of special places. The county concurs with the ratings on 23, 24 and 25 which indicate that Alternatives 1, 2 and 4 are highly detrimental to the cultural and natural environment.

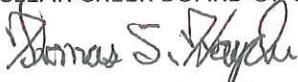
- Alternatives 1 and 2: The representation in the Matrix makes Alternatives 1 and 2 indistinguishable. The impacts resulting from each of the Alternatives are distinctly different. It is our recommendation that Alternatives 1 and 2 be analyzed separately during any future use of this Study.

Please consider this letter part of the formal record of the study. The Clear Creek County Commissioners request that it be included in the study's final documents.

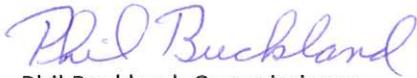
The County was pleased to participate in the Project Leadership Team (PLT) and Technical Team (TT) for the Traffic & Revenue Study for the I-70 Corridor.

Sincerely,

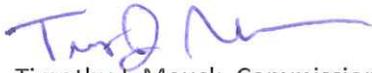
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