

## I-70 Floyd Hill State Air Quality Technical Report Addendum

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### Introduction

In July 2021, the Colorado Department of Transportation (CDOT) and Federal Highway Administration (FHWA) released an Environmental Assessment (EA) for the Interstate 70 (I-70) Floyd Hill to Veterans Memorial Tunnels Project (Project). Since the release of the EA, CDOT has been following a Construction Manager/General Contractor (CMGC) process for Project delivery. The purpose of the CMGC process is to optimize efficiency in design, schedule, and cost, minimize environmental impacts, manage risk, and ensure constructability.

Design innovations that have been identified through the CMGC process have resulted in refinements to the EA Preferred Alternative, which are described and illustrated in the *I-70 Floyd Hill to Veterans Memorial Tunnels Project Finding of No Significant Impact (FONSI)*. The design changes do not affect the air quality analysis included with the EA or the conclusion that the Project would not affect regional or localized emissions of pollutants regulated by National Ambient Air Quality Standards or mobile source air toxics and would not contribute to increased greenhouse gas (GHG) emissions.

However, since publication of the EA, the Project has been designated as a Regionally Significant Transportation Capacity Project in CDOT's 10 Year Plan under the requirements of Senate Bill 21-260 (SB260), which was signed by Governor Polis June 17, 2021. SB260 included new environmental requirements in Section 30, which have been codified in the Colorado Revised Statutes (CRS) 43-1-128. The CRS law requires Regionally Significant Transportation Capacity projects to account for the impacts on statewide GHG pollution as part of the planning process and for the air quality impacts as part of the environmental study process. Information on CDOT's interpretation of a Regionally Significant Transportation Capacity Project is provided on the [Greenhouse Gas \(GHG\) Program website](#).

Although requirements associated with CRS 43-1-128 were not in effect during the preparation of the EA, CDOT did include a quantitative analysis of GHG air emissions from on road vehicle tailpipe emission sources (e.g., passenger vehicles, heavy duty trucks) for existing conditions and future conditions for the Project. This analysis is documented in the *State Air Quality Technical Report, July 2021*, which is an appendix to the EA. This addendum updates the *State Air Quality Technical Report* to reflect CRS-43-1-128 requirements and interim guidance, as described below, and the associated monitoring requirements that will be required during the Project construction.

### Compliance with the GHG Planning Standard

To comply with the GHG requirements in the CRS, the [Pollution Reduction Planning Standard](#), commonly referred to as the "GHG Planning Standard," was adopted by the Transportation Commission in December 2021. On May 19, 2022, the Transportation Commission also voted to adopt [GHG Mitigation Measures Policy Directive 1610](#), which established an ongoing administrative process and guidelines for selecting, measuring, confirming, verifying, and reporting on GHG Mitigation Measures. The rule requires CDOT and the state's five

metropolitan planning organizations (MPOs) to create transportation plans that support travel choices which reduce GHG emissions. The agencies (CDOT and the MPOs) used travel demand models, in combination with the United States Environmental Protection Agency (EPA) Motor Vehicle Emission Simulator (MOVES) Model, to make this determination for different years in the future, and the emission goals differ for each agency. The Transportation Commission accepted CDOT's 10 Year Plan, which included the I-70 Floyd Hill Project, and the GHG Transportation Report in September of 2022, which demonstrates compliance with the GHG Transportation Planning Standard. This Regionally Significant Transportation Capacity Project was included in the statewide modeling that demonstrated compliance with the GHG Planning Standard, and therefore Part 3 of the SB21-260 and the associated CRS.

## GHG Reduction Measures

The Project incorporates components that are intended to reduce GHG emissions. These include:

- Improvements to the multimodal Clear Creek Greenway trail, which provides expanded local and regional connections to walking and bicycle trails.
- A new parking area and CDOT Pegasus transit shuttle service stop at the I-70 El Rancho Exit in Evergreen. In addition to supporting Pegasus use of the Express Lanes, the new lot includes other GHG reduction components with parking for carpooling and electric vehicle charging.
- Addition of a westbound Express Lane, which helps manage transportation demand by providing choices for travellers and improving travel time reliability.

Additionally, the CMGC identified the following GHG reduction measures that will be implemented during construction, which are included in the FONSI mitigation commitments:

- Keep construction equipment and vehicles well maintained in accordance with equipment manufacturing requirements to ensure exhaust systems are kept in good working order.
- Post signage indicating engines should not idle more than 5 minutes.
- Perform early offline construction work that reduces emissions from idling vehicles in potential traffic slowdowns.
- Encourage workers to carpool to the Project site and consider implementing a carpooling program.
- Use an existing gravel pit at the Project site to process excess rock cut material, reducing haul distance by 75 percent.

## Air Quality Modeling Requirements during Construction

Part 4 of the CRS requires air quality monitoring before and during construction. Although the guidance has not been finalized, an interim draft guidance is available, which indicates pre-construction monitoring will need to be conducted for a minimum of two weeks for a variety of pollutants that will likely include carbon monoxide (CO), nitrogen dioxide (NO<sub>2</sub>), particulate matter less than 10 microns in diameter (PM<sub>10</sub>), particulate matter less than 2.5

microns in diameter ( $PM_{2.5}$ ), and ozone in addition to meteorological data. During construction,  $PM_{10}$  and  $PM_{2.5}$  in addition to the meteorological data will be required for the duration of construction.

In support of statewide air quality goals ahead of the CRS requirements, CDOT committed in the EA to install two permanent air quality monitors in the Floyd Hill and Idaho Springs areas to gather data and monitor local air quality to supplement other regional air quality data. CDOT also committed to conduct real-time monitoring of dust emissions and take appropriate action if air quality is diminished by construction activities. The mitigation commitments for air quality monitoring have been modified to indicate the air quality requirements in Part 4 of the CRS apply and will be followed. Because the pollutants, duration, and number of monitors required may change, the CDOT Project Director and CDOT Construction Manager will coordinate closely with CDOT's Air Quality team to ensure the monitoring meets the most current guidance.