



United States  
Department of  
Agriculture

Forest  
Service

Arapaho and Roosevelt  
National Forests and  
Pawnee National Grassland

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File Code: 1950

Date: OCT 11 2011

Melinda Urban  
Twin Tunnels Project Lead  
Federal Highway Administration  
12300 West Dakota Avenue  
Lakewood, CO 80228

Dear Ms. Urban:

The Arapaho-Roosevelt National Forest (ARNF) would like to affirm our commitment to assist the Federal Highway Administration (FHWA) and Colorado Department of Transportation (CDOT) with the Twin Tunnels Environmental Assessment and Decision processes by participating in the implementation of established agreements from the I-70 Mountain Corridor Record of Decision. Of particular interest to the Forest are the implementation of the Section 106 Programmatic Agreement, the Context-Sensitive Solutions Guidebook, and the ALIVE and SWEEP Committee recommendations to be included during the planning, design, and construction of the project.

We do not anticipate any direct impacts to Forest Service resources as a result of this project, however, we would like offer up the potential for indirect impacts to the following:

- Air quality – short-term increase in dust and emissions from construction activities, along with the potential for long-term impacts resulting from increased emissions to the James Peak and Mt. Evans Wilderness Areas.
- Cultural/historic – short-term increase in noise and disruption during construction activities and the potential for long-term impacts resulting from increased road noise to the Clear Creek Ranger District Work Center, which is within the Area of Potential Effect.
- Recreation – short-term impacts on forest recreational users during construction activities.
- Solid waste/hazardous materials – no disposal or release of solid or hazardous waste materials on National Forest System lands.
- Water – potential for erosion/sedimentation impacts resulting from modifications to Clear Creek in the Twin Tunnels area.
- Wildlife/Fisheries – short-term increase in disturbance to wildlife species due to noise, lighting, and other construction activities. Long-term impacts to movements of wildlife



indigenous to National Forest System lands using the natural land bridge over the Twin Tunnels as an over pass to I-70 as a result of increased noise and lighting. Of particular note are potential disruptive impacts to the Georgetown bighorn sheep herd which uses this area regularly. They are a Forest Service sensitive species and should be specifically addressed in the EA.

Thank you for this opportunity to provide input to this project. If you have any questions or concerns regarding this letter, please contact Carol Kruse at (970) 295-6663.

Sincerely,

A handwritten signature in black ink, appearing to read "Dennis L. Jaeger". The signature is fluid and cursive, with a large initial "D" and "J".

DENNIS L. JAEGER  
Acting Forest Supervisor

cc: Daniel A Lovato, Oscar Martinez, Chelsea Gunsalus, Carol Kruse

**Board Officers**

James A. Taylor, Chair  
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Rod Bockenfeld, Immediate Past Chair  
Jennifer Schaufele, Executive Director

September 29, 2011

Mr. James P. Bemelen  
I-70 Mountain Corridor Program Manager  
Colorado Department of Transportation, Region 1  
18500 East Colfax  
Aurora, Colorado 80011

Dear Mr. Bemelen:

On September 26, 2011, Steve Rudy, DRCOG's Director of Transportation Planning and Operations, attended the Agency Scoping Meeting for the Twin Tunnels Environmental Assessment (EA). At the meeting, Steve made a specific request, and while verbal comments at the meeting are sufficient record, the state and federal project team members in attendance requested that the comments be conveyed in writing. This letter does so.

As articulated at the meeting, Steve's request was that the EA process examine tolling/pricing options for the improvements. This is not to be construed that tolling/pricing was requested as an outcome; only that the EA process appropriately explore such. When project team members asked Steve to further articulate expectations for what should be examined, he listed three potential, sequential options:

- a. Tolling all 3 eastbound lanes, 24/7/365 (potential rationale: revenue generation)
- b. Congestion pricing of all 3 eastbound lanes, during periods of high traffic only (potential rationale: managing temporal demand)
- c. Pricing of 1 eastbound managed lane, during periods of high traffic only (potential rationale: providing travel time reliability for a fee)

These were offered not as the "only" tolling/pricing options that might be considered, but as reflective of the types of options the project team should consider. For example, it is evident that options a and b could be considered in combination (nominal toll during low demand periods, higher toll during high demand periods). These were offered also recognizing that the project team must determine their consistency with the I-70 Programmatic EIS Record of Decision before including any as part of a formal examination, and that any examination would include consistency with current federal law, relationship to project purpose and need, etc.

While the Twin Tunnel improvements are now being messaged as operational and safety improvements, the proposal accomplishes that by adding 3 miles of through lane capacity. That amount of capacity addition is regionally significant and, ultimately, must be depicted on the DRCOG Metro Vision Regional Transportation Plan (MVRTP)—DRCOG being the Transportation Planning Region in which this project lies. Because such is not currently shown

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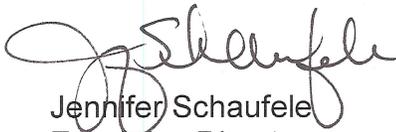


in the MVRTP, DRCOG staff has repeatedly informed CDOT Region 1 it will need to submit an RTP amendment during one of DRCOG's biannual plan amendment periods.

To be clear, the DRCOG Board has taken no action on this project to date, and will not do so until a Plan amendment request is submitted. As reported by Transportation Commissioner Parker at the August Commission workshop, CDOT's new messaging is apparently "Bottom line: CDOT does not have any money currently for new capacity to improve mobility"—a message that many Board members indicate CDOT has been conveying to them for some time now. The nuances of what the new capacity in the Twin Tunnels project might be trying to accomplish (mobility, or not?) will not be clear to the public or our Board members. In conversation, some Board members have asked DRCOG staff specifically whether CDOT is examining tolling or pricing in the I-70 corridor. It would be prudent for the project team to be able to answer that question in the affirmative at such time as a Plan amendment is being considered. And it would simply be good policy in the age of "no money available for mobility capacity" for CDOT to routinely examine such when implementing major projects.

If you have further questions about this request, feel free to contact me or Steve Rudy.

Sincerely,



Jennifer Schaufele  
Executive Director

c: Ben Acimovic, Colorado Department of Transportation Region 1  
Melinda Urban, Federal Highway Administration  
Don Hunt, Colorado Department of Transportation Executive Director



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
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OCT - 6 2011

Ref: 8EPR-N

Mr. Jim Bemelen  
I-70 Mountain Corridor Program Manager  
Colorado Department of Transportation  
13500 E. Colfax Avenue  
Aurora, CO 80011

Re: Twin Tunnels Environmental Assessment  
Scoping Comments

Dear Mr. Bemelen:

Thank you for inviting the United States Environmental Protection Agency (EPA) Region 8 to be on the Technical Team for the Twin Tunnels Environmental Assessment (EA) as part of the collaborative process that began with the Revised Draft Programmatic Environmental Impact Statement (EIS) for the I-70 Mountain Corridor and is continuing in the development of the National Environmental Policy Act (NEPA) Tier 2 documents. Based on our participation in the September 8, 2011 Technical Team meeting, the agency scoping meeting on September 26 and the public scoping meeting the following evening in Idaho Springs, the EPA would like to provide the Colorado Department of Transportation (CDOT) and the Federal Highway Administration (FHWA) with comments. Our comments are provided for your consideration pursuant to our responsibilities and authority under Section 102(2)(C) of the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4332(2)(C), and Section 309 of the Clean Air Act, 42 U.S.C. Section 7609.

This project involves a 3-mile stretch of I-70 from the Idaho Springs interchange to the bottom of Floyd Hill. To increase safety and mobility and to reduce traffic congestion in this section of the interstate highway, CDOT is proposing to: (1) add a third eastbound travel lane plus shoulders, (2) widen the eastbound tunnel, (3) flatten curves and improve sight distance by adding median/retaining walls, (4) replace the eastbound bridge over Clear Creek just west of Hidden Valley and (5) build transitions to and use a 1-mile segment of County Road 314, a frontage road, as a potential construction detour. The EPA understands that this project is on an extremely aggressive schedule and that CDOT and FHWA are anticipating a decision document by September 2012. In addition, CDOT informed the Technical Team that they will only be considering the proposed action (i.e., Concept Package 2) and the no action alternative in the EA. Previously proposed alternatives were considered and analyzed by a large stakeholder group and engineering experts during the week-long Tunnel Visioning Workshop in February 2011.

The EPA has reviewed the CDOT Scoping Form Considerations that were provided at the agency scoping meeting. We agree that the listed concerns should be studied and have added several more in the following areas:

### **Air Quality**

One of the bullets under Climate and Air Quality Resources in Table 1 Mitigation Strategies in the Record of Decision (ROD) for the I-70 Mountain Corridor Programmatic EIS committed to conducting air quality monitoring during construction, including PM<sub>2.5</sub>, for Tier 2 projects. On the CDOT scoping form for this project, developing a methodology for assessing PM<sub>10</sub> was listed under Air Quality as a consideration. The EPA recommends that both PM<sub>10</sub> and PM<sub>2.5</sub> be monitored. PM<sub>2.5</sub> would address emissions from combustion, primarily diesel engine emissions, while PM<sub>10</sub> would deal more with dust concerns. Also, the Draft EA should ensure that the mitigation measures committed to in the ROD will be implemented by CDOT for the Twin Tunnels project.

### **Water Quality**

The section of Clear Creek in the 3-mile project corridor is listed as impaired for cadmium under the Clean Water Act (CWA) Section 303(d). Besides cadmium, other mining wastes such as zinc and pH may be present in this reach at elevated levels due to historical mining operations in the area. Therefore, CDOT should ensure that no further degradation related to this project occurs. In addition, the EPA recommends that CDOT apply for an individual stormwater construction permit.

### **Wetlands**

The EPA understands that initially the project team had thought that the project would not exceed 0.5 acres of impacts to Clear Creek and wetlands that could allow for an expedited CWA Section 404 permitting process. Subsequently, the EPA has learned that there may be greater impacts. The EPA appreciates that CDOT will be working closely with the signers of the Stream and Wetland Ecological Enhancement Program Memorandum of Understanding to ensure that “appropriate mitigation strategies, including design, implementation and monitoring for anticipated environmental impacts likely to occur as a result of redevelopment of the I-70 Mountain Corridor” will be implemented.

### **Noise**

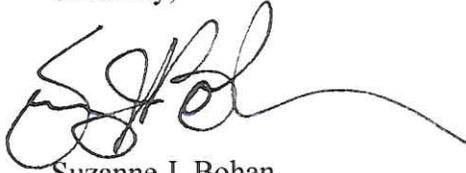
The CDOT scoping form states, “May need a separate construction noise assessment, especially for detour route.” The EPA recommends performing this noise assessment, particularly because plans call for construction on a 24-hours a day, 7-days a week schedule.

### **Peak Period Pricing**

The EPA understands that CDOT is considering tolling the new third lane during peak periods and that this initiative is part of a new policy that will help subsidize new transportation projects. At the agency scoping meeting, Denver Regional Council of Governments suggested that having a tolled lane might increase weaving and negatively impact two of the primary needs for this project—to increase safety and mobility. The EPA recommends that CDOT evaluate and address those concerns.

We appreciate the opportunity to provide comments at this early stage of the NEPA process for the Twin Tunnels EA and we will continue to work with CDOT and FHWA as a member of the Technical Team. If you have any questions, please contact me at 303-312-6925 or Carol Anderson of my staff at 303-312-6058.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. Bohan', with a long horizontal flourish extending to the right.

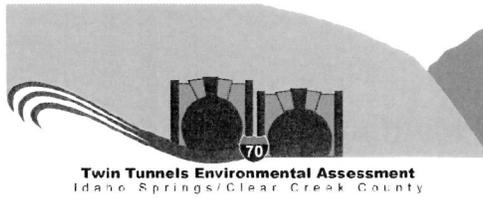
Suzanne J. Bohan  
Director, NEPA Compliance and Review Program  
Office of Ecosystems Protection and Remediation

cc by email:

Stephanie Gibson, Federal Highway Administration

Ben Acimovic, Colorado Department of Transportation





# Agency Comment Form

First Name: Maria Last Name: D'Andrea Agency: Jefferson County  
Address: 100 Jefferson County Parkway City: Golden Zip Code: 80419-3500  
suite 3500  
Email Address: mdandrea@jeffco.us

## My Agency's Areas of Interest Are:

- |                                                     |                                                                |                                                                   |
|-----------------------------------------------------|----------------------------------------------------------------|-------------------------------------------------------------------|
| <input type="checkbox"/> Air Quality                | <input type="checkbox"/> Land Use                              | <input type="checkbox"/> Threatened or Endangered Species         |
| <input type="checkbox"/> Archaeological Resources   | <input type="checkbox"/> Noise                                 | <input type="checkbox"/> Section 4(f) Resources                   |
| <input type="checkbox"/> Energy                     | <input type="checkbox"/> Noxious Weeds                         | <input checked="" type="checkbox"/> Transportation                |
| <input type="checkbox"/> Environmental Justice      | <input type="checkbox"/> Paleontological Resources             | <input type="checkbox"/> Vegetation                               |
| <input type="checkbox"/> Farmlands                  | <input type="checkbox"/> Relocation/Right-of-Way               | <input type="checkbox"/> Visual Quality/Aesthetics                |
| <input type="checkbox"/> Floodplains                | <input checked="" type="checkbox"/> Pedestrians and Bicyclists | <input checked="" type="checkbox"/> Water Quality/Water Resources |
| <input type="checkbox"/> Geology                    | <input type="checkbox"/> Recreation                            | <input type="checkbox"/> Wetlands                                 |
| <input type="checkbox"/> Hazardous Materials/Wastes | <input type="checkbox"/> Socioeconomics                        | <input type="checkbox"/> Wildlife and Fisheries                   |
| <input type="checkbox"/> Historic Properties        | <input type="checkbox"/> Soils                                 |                                                                   |

## Question/Comment

### Project Purpose and Need

- Does the purpose and need establish a need for action and expenditure of public funds?

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### Proposed Action

- Do you have any comments about the Proposed Action and its relation to the Purpose and Need or the PEIS?

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# Twin Tunnels EA

## Environmental Scopes and Methodologies

- I have reviewed the list of resources proposed for detailed analysis and agree ~~disagree~~ (circle one) that the scope of analysis is appropriate.

## Environmental Considerations

- I have reviewed the mitigation strategies from the June 2011 I-70 Mountain Corridor Record of Decision (Section H. Mitigation Strategies) and agree ~~disagree~~ (circle one) that the strategies are appropriate.

- Do you have other comments on environmental considerations for this project?

## Schedule

- What can CDOT do on this project to streamline your Agency's participation in the EA?  
What do you see as your level of involvement: Review Final Documents Participate in Regular Meetings Other:

## Other Comment(s)

Please return your comments by the end of the scoping period, October 10, 2011, to Loretta LaRiviere at [loretta.lariviere@ch2m.com](mailto:loretta.lariviere@ch2m.com) or c/o CH2M HILL, 9193 S. Jamaica Street, Englewood, CO 80112.

**From:** JoAnn Sorensen [mailto:jsorensen@co.clear-creek.co.us]

**Sent:** Monday, October 10, 2011 12:26 PM

**To:** LaRiviere, Loretta/DEN

**Cc:** Thomas Breslin; Cynthia Neely; Mary Jane Loevlie; Joan Drury; Kevin OMalley; Tim Mauck

**Subject:** Comments on Twin Tunnels EA Scoping Process

I would offer the following thoughts for your consideration as the Twin Tunnels project moves forward:

1. The connection between the Twin Tunnels Project and the construction bypass (that is currently being considered as an independent project) needs to be acknowledged. But for the Twin Tunnels Project, the bypass project would not be happening. The two projects are inextricably linked.
2. It is concerning to hear that a FONSI is expected as the outcome of this NEPA evaluation. Unless sufficient research and work has already been accomplished, but not shared with the public, stating that a FONSI will be the determination is presumptuous. Working towards a pre-determined outcome is one of the things that got the Draft PEIS in trouble.
3. The documentation for this project should demonstrate that the ultimate solution for I-70 can be accomplished through this area. The public should see that an Advanced Guideway System, full frontage road system and the Clear Creek County Greenway plan (all accomplished with sensitivity to the environmental aspects of the area) can all be accommodated before the Twin Tunnels project proceeds.
4. Due to proximity to Clear Creek, both during and after construction, construction and maintenance runoff should be addressed.
5. The plan for disposal of the waste products that will result from the tunneling should be disclosed.
6. As mitigation, the current (somewhat informal) raft launch site just east of the tunnels should be looked at for possible improvements. Right now it can be a safety consideration when buses, trailers, rafts and people are moving around so close to CR 314 which serves as the frontage road for I-70.
7. The curves between the tunnels and Floyd Hill not only cause drivers to slow down, they also present a significant safety issue. This location has one of the highest accident rates in Clear Creek County. We have heard that hard shoulder running is being proposed for this area. This should not be considered the fix. Curve smoothing and appropriate shoulders are necessary.
8. I am concerned that the continuing message we seem to be hearing – that funding may not allow a full, permanent improvement to CR 314 – is an excuse to once again do a less-than-satisfactory project through Clear Creek County. That is what happened when I-70 was first constructed. Our neighboring counties to the west received much more complete consideration by the time I-70 was constructed there. The Vail Pass bike path and the design through Glenwood Canyon should be used as models for the work that will be done in Clear Creek County. If there is not enough money to do a proper and complete project, wait until the funding becomes available.

Jo Ann Sorensen  
Clear Creek County  
Land Use Division Director  
PO Box 2000  
Georgetown, CO 80444

Voice: 303-679-2409

Fax: 303-569-1103