



UPPER CLEAR CREEK WATERSHED ASSOCIATION

City of Idaho Springs
Dylan Graves
Community Development Planner
Email: DGraves@idahospringsco.com

December 29, 2023

Re: Referral - City of Idaho Springs, Colorado Department of Transportation, West Floyd Hill Project 1041 Application Submittal

Dear Mr. Graves:

The Upper Clear Creek Watershed Association (UCCWA) is designated under Section 208 of the Clean Water Act as the management agency responsible for reviewing proposed actions that may impact water quality in the watershed. Our membership includes municipalities, counties, dischargers, and related entities located in the upper Clear Creek watershed, primarily in Clear Creek and Gilpin counties. UCCWA offers the following referral recommendations for Floyd Hill 1041 permit considerations.

UCCWA proposes the 1041 permit requires installation, maintenance, and public dissemination of data from water quality monitoring stations, with a specific emphasis on the outfall of each detention basin. Detention basins are not currently designed to monitor dissolved chlorides. At present, CDOT recommends addressing chloride through attenuation, infiltration, concentrated snow storage, and an improved winter maintenance program. There may be an opportunity for the community to collaborate with CDOT in the creation of a model to better identify chloride sources, both from local entities and CDOT. Currently, chloride is considered a non-point source of pollution. A model may inform chloride that is point source vs. non-point source.

The Sediment Control Action Plan developed for I-70 should be updated and may be the medium to reconsider sediment basin functionality and the possibilities of equipping them to measure chloride levels, cations, trace metals, and data collection. Water samples for chemical analysis can be taken using either automatic sampling or manual collection methods. A continuous recording conductivity/temperature probe can be used to track chloride salts, as has been done in receiving streams using specific conductance/chloride correlations. We recommend that concentrations of chloride do not exceed 250 mg/L, as defined in Regulation #38 Stream Classifications and Water Quality standards for Clear Creek Basin (enclosed), and that an acute level of 860 mg/L, in accordance with the [National Recommended Aquatic Life Criteria Table](#), serves as the upper limit.

We recommend a water quality monitoring program be developed by CDOT or as a collaborative effort. It is important to monitor long-term chloride trends in Clear Creek. CDOT has I-70 mountain corridor outfall drainage chloride and trace metal data collected as part of the PEIS baseline study. There are also 20 years of in-stream monitoring data for conductivity/chloride. All this data is available in conjunction with CDOT I-70 water quality reports including trend analysis.

This monitoring plan should include a Water Quality Assurance Project Plan (QAPP) for water quality modeling throughout the corridor with associated Sampling Analysis Plan(s) (SAP) created for each construction phase segment of Interstate 70 to be housed under said QAPP. Data collected at detention basin outfalls and within the segments of the Floyd Hill project areas should be compared to historical data and/or water quality measurements taken upstream of the project areas, providing a baseline for assessing the project's impact on water quality. In the short-term, action should be directed to deicing hotspot studies on sensitive stretches of Clear Creek.

Finally, we emphasize the need for a proactive approach by CDOT in case water quality is found to be impaired, referencing the Regulation #38 values and the Aquatic Life Criteria Table. When such impairment can be reasonably attributed to the Floyd Hill project, we request CDOT to reassess strategies and implement mitigation measures until the stipulated criteria can be met. CDOT shall be responsible for planning and payment of these efforts.

We also request an amendment to CDOT's Trade Materials and Improved Soil and Habitat Policy. Specifically, we propose the modification of the policy to permit the utilization of trees trade in alignment with the specific needs of the community. This adaptation would allow for the strategic deployment of identified appropriate tree species for trade in critical areas, including riparian zones and pre-wildfire planning projects, providing significant environmental benefits. Additionally, we advocate for an extension of the timeline for the distribution of trade materials to a range of 5-7 years, as opposed to the current practice of limiting distribution within the course of the construction project period. These adjustments would enhance the policy's effectiveness, better support environmental initiatives, and contribute to responsible resource management.

Thank you for the opportunity to comment.

On behalf of the UCCWA membership,



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Enclosure:
Stream Classifications_AdoptedRules12008-00980

Cc:

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