

Trout Unlimited Floyd Hill Deicer Concerns:

TU understands the need for I-70 road treatments, and the importance of the I-70 expansion project overall. Local communities and the State will greatly benefit from the much-needed improvements.

However, TU National and the local TU chapter are concerned about the additional input of deicer to the Clear Creek corridor, which is predicted to be above already toxic levels for most aquatic life and vegetation. CDOT's response to TU's requests for implementation of an appropriate road treatment mitigation strategy appear to be the following:

- Water quality data is inconclusive and cannot definitively show CDOT road treatment activities are the cause of degradation;
- The river corridor is already degraded;
- CDOT activity (and, therefore, permanent impacts) will not be directly in the channel.

CDOT's conclusion seems to have led to the EA finding of no significant impact" (FONSI).

Deicer impacts from the CDOT I-70 expansion project have already been realized and considerably researched on the west side of the Divide, where water quality, biodiversity, and roadside vegetation have been notably degraded due to CDOT deicing activities. On the east side, CDOT's own hired consultant has been monitoring water quality for a decade—the trend showing annual deicer pulses coupled with low stream biodiversity. A number of organizations (including TU) have been collecting data that CDOT does not seem to regard. In addition, the finding of no significant impact based on the already degraded condition of Clear Creek opens the door to a slippery slope situation such that the condition of the river at any point becomes the best-case scenario. Finally, though CDOT construction activity may be temporary directly in the channel, the deicing treatments will continue in perpetuity.

TU is considering that CDOT's position is a possible violation of the EA, however, the organization cannot further appeal without partners. While deicer impacts are a problem in most cold weather States, I-70 expansion presents an opportunity for CDOT, the Clear Creek community, the State, TU, School of Mines, etc. to collaborate and develop innovative, environmentally sound solutions. The Clear Creek County 1041 may be the most strategic and impactful tool to open the door to such opportunities via UCCWA the Clear Creek community requesting stipulations requiring CDOT to avoid and minimize further degradation of the Clear Creek corridor.

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