DATE: January 17, 2018
TO: Transportation Commission
FROM: Herman Stockinger, Director, Office of Policy and Government Relations
SUBJECT: TC Overview of “1601” Process for Interchange Construction & Modification

Purpose
To provide the current Transportation Commission an overview of the Commission and CDOT policy and process for constructing and modifying interchanges on the state highway system, as laid out in Policy Directive 1601.0.

Action
• Create a TC understanding of what the process is for constructing and modifying interchanges on CDOT property.
• Discuss with TC whether modifications to the Policy Directive are appropriate (and what level of modifications the TC believes is necessary)
• Prepare the TC for action on specific upcoming interchange requests in the coming months

Background
The Policy Directive 1601.0 was first adopted by the Commission in the mid-1980s, and hasn’t been modified by the Commission in ten years. The directive outlines the guiding principles and steps necessary to approve a new interchange or interchange modification on the interstate, freeway, or state highway system. The process applies to CDOT and Local applicants (developers and other private interests work through their local government). Each proposal is different, unique, and based the complexity of the project, thus a need for a consistent process.

In year’s past, a “mantra” of the Transportation Commission was “if it is a developer driven interchange” the state will not pay for it. The 1601 approval process is what exists to ensure that is the case, or, when deemed appropriate, modifications to that standard expectation may be considered and approved.

Details
The Commission will hear about three types of modifications, with the “Type 1” modifications being those that require Commission approval.

• Type 1 - New Interchanges on the Interstate and Freeway system
  o These are approved by the Transportation Commission (TC)
• Type 2 - New interchanges on the remaining state highway system and modifications to interchanges
  o These are approved by the Chief Engineer
• Type 2a - Minor modifications to interchanges, which do not require a system level analysis
  o These can be delegated by the Chief Engineer for approval to the Regional Transportation Director (RTD).

Options
• Option 1: TC believes existing language of 1601 Policy is adequate with minor updates (staff recommendation)
• Option 2: TC wants to dig into the specifics of 1601 a bit more through one or more workshops during 2018, with an eye toward significant policy changes
• Option 3: Do not update the Policy, and TC will continue to address 1601 requests within the framework of the existing PD

Attachments
• Attachment A: Overview Presentation
• Attachment B: I-70 & 32nd Memo
• Attachment C: I-70 & 32nd Presentation
• Attachment D: Jefferson Parkway Memo
• Attachment E: Jefferson Parkway Presentation
• Attachment F: Policy Directive 1601.0
1601 Interchange Approval Process
Primer for Transportation Commission
What is CDOT Policy and Procedural Directive 1601?

A process to review and approve requests for new interchanges and major improvements to existing interchanges on the state and federal-aid highway system.

Requires applicant/consultant preparation of and CDOT approval of a System Level Study.

Integrates FHWA and CDOT environmental, access, permitting, and approval procedures.
Background

The original directive

- drafted mid-1980s
- adopted 1989
- revised 2000 and 2005

Why did CDOT create this policy?

- Recurring issue of local access vs. regional mobility:
  - new interchange VS. long-term freeway operations if new interchanges were continually added
• Preserve the state highway system’s LOS
• Ensure fair and consistent consideration of proposals for new & existing interchanges
• Have sufficient information for CDOT to make an informed decision
• Minimize duplicative analytical, regulatory, and procedural requirements
• Match project complexity with the correct level of approval
The 1601 policy and procedural directive outline the guiding principles and steps necessary to approve a new interchange or interchange modification on the interstate, freeway, or state highway system.

- Applies to CDOT and Local Government applicants
- Each proposal is different based on the complexity of the project, thus a need for a consistent process
Interchange Improvement Types

– **Type 1** - New Interchanges on the Interstate and Freeway system
  • These are approved by the Transportation Commission (TC)

– **Type 2** - New interchanges on the remaining *state highway system* and modifications to interchanges
  • These are approved by the Chief Engineer or maybe elevated to the Transportation Commission

– **Type 2a** - Minor modifications to interchanges, which do not require a system level analysis
  • These can be delegated by the Chief Engineer for approval by the Regional Transportation Director (RTD).
• The state highway system shall be owned by CDOT.

• The applicant is responsible for all costs
  – Includes design, ROW, construction, maintenance and replacement.
  – CDOT participation in any cost sharing proposal must be approved by TC

• Applicants must demonstrate significant progress within 3 years of receiving Commission approval.
  – No more than two (1-year) extensions may be given.
Scope: The City of Brighton proposes to construct an interchange at I-76 and Bridge Street. The proposed interchange provides an opportunity to increase regional east-west connectivity across State Highway 7 (SH 7)

Location: I-76 and Bridge Street

Applicant: City of Brighton

NEPA Clearance: TC Approval in October 2013 and approved FONSI August 2015

Estimated cost: $6.5 million (2013 dollars)

Status: In process
**Scope:**
Reconstruction of the I-25 Interchange between Colorado Ave (to the north) and Nevada Ave/Tejon Street interchange (to the south) RAMP Project.

**Location:**
I-25 and Nevada Ave

**NEPA Clearance:**
Project completed

**Cost:**
$115 million

**Status:**
Complete Oct 2017
**Scope:**
The project will construct improvements to increase the deceleration length of the EB I-70 to SB SH 65 off ramp, improve the ramp connection by increasing the length of the merging taper for the EB to SB movement, and improve the EB to SB ramp sight distance and super elevation. Project will also include an extension to the WB on ramp to I-70.

**Location:**
I-70 MP 49

**NEPA Clearance:**
CatEx

**Estimated cost:**
$3.5 million

**Applicant:**
CDOT

**Status:**
Awarded, Construction Spring 2018
1601 Process Overview - Steps

1. Notification by applicant
2. Pre-application meeting
3. Initial intergovernmental agreement (IGA)
4. Prepare a System Level Study (SLS)
   1. Applicant initiates/complete the National Environmental Policy Action (NEPA) process:
      1. Conduct agency and policy scoping
      2. Prepare the necessary NEPA documentation
         1. Categorical Exclusion (CatEx)
         2. Environmental Assessment (EA)
         3. Environmental Impact Statement (EIS)
5. Transportation Commission approval of SLS
   1. FHWA approval of the NEPA document and Interchange Access
6. Approval by MPO/TPR Board (Consistent with Constrained RTP and TIP)
7. Conceptual design and NEPA approval process
8. CDOT approval of Final IGA on cost sharing and operations/maintenance
What is a System Level Study?

- Draft Purpose and Need
- Existing and Forecasted Conditions
- Alternatives
- Planning-level Screening of Alternatives
- Environmental Considerations
- Funding and Phasing
New FHWA Policy on Interstate Access

- The new policy pending publication in the federal registry for public review and comment
  - Although publication is pending it is in effect for new interchange requests as of May 2017

- The revised policy is intended to streamline and eliminate duplicate documentation for FHWA interchange access approval

- Updated policy allows CDOT to submit a single technical report for FHWA approval

- The new policy should be reflected in any update to the current 1601 policy and procedural directive
Questions?
DATE: 1/5/2018

TO: Transportation Commission

FROM: Paul Jesaitis, R1 Transportation Director

SUBJECT: I-70 and 32nd Ave. 1601 Interchange Access Modification History and Status

Interchange modifications at I-70 and 32nd Ave. and other area improvements were first identified and requested by the City of Wheat Ridge in 2005, and the series of studies at the time were approved in concert with CDOT and FHWA. The City now requests these same improvements to phased, and they are re-analyzing traffic and refreshing applicable studies to obtain new approvals.

In 2005, Cabela’s showed strong desire to build a regional destination store on the west side of I-70, north of 32nd Ave and south of SH58, and purchased the property. In cooperation with the City of Wheat Ridge, a succession of studies and clearances were completed. The System Level Study and 1601 Interchange Access Modification were approved by the Transportation Commission in 2005. CDOT and FHWA then provided oversight of the NEPA analysis, with rigorous alternative consideration and public outreach. NEPA documentation was completed and approved in 2006 (I-70/32nd Environmental Assessment) and 2007 (I-70/32nd Finding of No Significant Impact). Design plans were completed in 2008 and the FHWA approval was received in 2009. Cabela’s focus shifted in 2011, and they abandoned plans to develop the site.

In 2014, Wheat Ridge started entertaining new developer concepts that contemplated less intensive land uses that would thus require fewer transportation improvements. Working with CDOT and FHWA, traffic analyses and NEPA re-evaluation were performed that showed the logic and acceptability of this “phased” approach for the series of transportation improvements approved as the “Preferred Alternative” in the original NEPA decisions. Some improvements, such as the SH58 to I-70 ramps and the 40th Ave underpass had already been completed, while others, such as the westbound I-70 hook ramps, eastbound I-70 hook ramps, and new interchange on SH58, were yet to be built. The phased approach was approved by CDOT and FHWA at the time.

In 2015, Evergreen Development proposed the Clear Creek Crossing (CCC) mixed use development to Wheat Ridge, with a land use intensity that would require the westbound I-70 hook ramps but not the SH58 Interchange. Again working with CDOT and FHWA, Wheat Ridge and the developer have evaluated the acceptability of this plan and crafted documents for review and approval. The first step of analysis was to ensure that traffic (both background and site generated) would be adequately served in 2040 by these selected parts of the original Preferred Alternative. It has been concluded that the proposed development can reach approximately 2,200 weekday peak hour vehicle-trips without the SH58 interchange, and introduction of westbound hook ramps is not expected to cause operational
issues along mainline I-70. Surface street intersections will show some signs of stress with and without
development by Year 2040, but these can be addressed via feasible mitigation measures, and the
ongoing efficacy of the system will be reviewed in the future through iterative City Traffic Impact
Analyses. CDOT and FHWA have approved the traffic analyses to date.

The SH58 interchange, a part of the original Preferred Alternative, has been shown to not be needed for
this development proposal and would be evaluated in the future if and when Coors opts to develop the
area north of Clear Creek, along SH58. The original funding plan agreed to by CDOT and Wheat Ridge
show this potential SH58 interchange as not Federal/State funded. However and incidentally, the
funding plan does reflect CDOT commitment to fund aspects of the original Preferred Alternative,
including eastbound I-70 hook ramps at 27th Ave, a new pedestrian bridge in this location, and an
additional southbound turn lane from Ward Road to westbound I-70.

The consultants (FHU and WSP) are now drafting a new System Level Study for approval by CDOT
through a new 1601 process resolution, and by FHWA through their Interchange Access Request
process. These documents are expected to be complete in the next month, for approvals in February or
March. Parallel with these efforts, the design plans have gone through standard iterative review
through the CDOT Permits system and NEPA reevaluation is ongoing.

Pending approvals, construction is expected to begin in the spring. The City of Wheat Ridge has agreed
to pay CDOT $20,000 for part-time review of the project by a CDOT Engineer, who will represent CDOT
interests with regard to work quality and impact to the traveling public on westbound I-70. By the
permit through CDOT Region 1 Permits, CDOT will retain final acceptance authority for all facilities and
appurtenances to be owned and maintained by CDOT.

The distribution of ownership and maintenance responsibilities has been agreed to by CDOT and Wheat Ridge staff, with CDOT continuing to own and maintain features within CDOT ROW that are directly associated with Interstate access, such as the roadway surface, extended hydraulic pipes, and ramp structure. This is the recommendation of CDOT staff, since the existing off ramp is being removed and accommodation has been made for CDOT plows to be able to plow the I-70 facility in much the same way as exists now.

With CDOT maintenance resources spent as they are today, no federal or state funds/resources being otherwise spent on this interchange modification, as directed in PD 1601, and when study/documentation is complete, CDOT Staff will recommend approval of this 1601 application. This 1601 is Type 1, to the Transportation Commission for approval, rather than a Type 2 delegated to the Chief Engineer, because the westbound hook ramps are arguably a new interchange on an Interstate, and it was originally a Type 1 in 2005. Both the payment provisions and maintenance responsibilities have been documented by IGA.
Upcoming 1601 Interchange Access Modification Request

Interstate 70 Westbound Ramps at 32nd Avenue (Wheat Ridge)

CDOT Transportation Commission Workshop
January 17, 2018
Presentation Content

- History
- Phased Implementation
- Current Proposal
- Upcoming Actions
History

- Cabela’s purchased the site in 2005 and crafted a large retail development plan.

- Transportation Commission approved the Type 1 1601 by Resolution in 2005, which included:
  - Approval of Proposed Actions for the area
  - 3 year sunset language.


- Cabela’s abandoned development plans in 2011 due to strategy shift.
Phased Implementation

• December 2014: City determined a phased approach would be more suitable to current climate and financial sustainability.

• Prospective developer planned less intensive land uses that avoid improvements to I-70. Original EA/FONSI Preferred Alternative improvements remain as commitments by Wheat Ridge.

• CDOT/FHWA approved this approach in 2015.
Current Proposal

- Summer 2015: New developer hopes to develop mixed use commercial development and associated access improvements south of Clear Creek.

- Wheat Ridge, with CDOT and FWHA oversight, perform traffic analysis using revised land uses and Year 2040 traffic to confirm:
  
  - Operational acceptability of the system with proposed phased improvements, the WB I-70 hook ramps at 32nd Ave.

  - The SH58 Interchange in not needed for proposed land use intensity.
Key Findings
To Date

• Site development land use and corresponding transportation improvements operate acceptably, with signs of stress with and without development by Year 2040 on local streets, which can be addressed via feasible mitigation measures.

• Introduction of WB hook ramps are not expected to cause operational issues along mainline I-70.

• Traffic thresholds have been established, correlating site development plans with traffic improvement needs, which will be reviewed in the future through City Traffic Impact Analyses.

• Maintenance responsibilities will be similar to current conditions.
Next Steps

• Complete System-Level Feasibility Study (SLFS) Interstate Access Request (IAR) document for CDOT Region and FHWA review and approval.

• Request 1601 approval by Transportation Commission at February or March 2018 meeting.
  • 1601 approval is Type 1, to the Transportation Commission, rather than a Type 2 delegated to the Chief Engineer, because the westbound hook ramps are arguably a “new” interchange, and original 1601 approvals in 2005 were Type 1.

• Complete Environmental Assessment Re-evaluation in Spring 2018 and start construction
  • CDOT Staff to monitor construction
  • IGA for maintenance is complete
Ultimate Preferred Alternative
Jefferson Parkway is a proposed 10 mile tolled highway facility between SH 128 in Broomfield and SH 93 in northern Jefferson County. The parkway will also intersect with SH 72, also in northern Jefferson County. The Parkway is to be financed, designed, constructed, operated and maintained by a public-private partnership. Proposed improvements are funded through non-Federal and private funds, and the Colorado Department of Transportation is not participating in the funding of the project. However, because this facility is intersecting with the state highway system, it falls under the permitting requirements of Procedural Directive 1601.

In 2009, the Colorado Transportation Commission adopted Resolution TC-1752 approving a System level study for three interchanges at SH 128, SH 72 and SH 93 for the proposed Jefferson Parkway, under PD 1601. The System Level Study identified a need for intersections in 2015, and interchanges in 2035, to be studied further in a Project Level Traffic Study. The resolution delegated to the Chief Engineer the authority to approve project level studies for each of these interchanges, and the approval of the design and any Intergovernmental Agreements necessary for the construction and maintenance of these connections to the State Highway System.

The Resolution further provided for five approval contingencies:

- **Inclusion of improvements into fiscally constrained regional transportation plan.**
  - The improvements are included in the 2035 and 2040 plan
- **Detailed traffic impact study at intersections identified in system level study that appear to have unacceptable levels of service.**
• Detailed traffic impact study demonstrates that affected intersections to have unacceptable levels of service, with or without Jefferson Parkway.

• **Completion and approval of NEPA decision document with meaningful public involvement**
  - Since no federal funds are utilized, NEPA is not appropriate. A NEPA-like process is underway, including a series of public meetings.

• **Approval of applicable interchange access, design, and environmental permitting by appropriate agencies.**
  - Underway

• **Approval by the Chief Engineer of an IGA for the financing, construction, maintenance, and operations of the proposed facilities.**
  - Underway

No action is requested from the Transportation Commission. This presentation is included as part of today's broader 1601 discussion as an example of how such a project moves through the policy approvals of the Commission, and then is further developed by the Chief Engineer and Region staff. The project level study recommends intersections to be constructed for opening day on SH 93 and SH 128, and an interchange at SH 72. Access permits are being developed for the intersections and the SH 72 Interchange, as well as an IGA that defines operational triggers that will mandate construction of interchanges at the SH 93 and SH 128 intersections. Again, resolution TC-1752 delegated these responsibilities to the Chief Engineer, and this memo is provided as a project update to the Commission.
Jefferson Parkway Overview and Project Location

The Jefferson Parkway is a proposed privately funded and operated transportation facility that intersects State Highways 93, 72 and 128.
Jefferson Parkway
2009 Commission Resolution TC–1752 Summary

• Approval of System Level Study for Jefferson Parkway meeting standards set forth in Policy Directive Number 1601

• System Level Study recommended connections at state highways were intersections in 2015 and interchanges in 2035 that were to be further studied in a Project Level Study

• Proposed improvements funded through local or private investors and the Colorado Department of Transportation is not participating in the funding of the proposed improvements
Jefferson Parkway
2009 Commission Resolution TC–1752 Approval Contingencies

• Inclusion of improvements into fiscally constrained regional transportation plan

• Detailed traffic impact study at intersections identified in system level study that appear to have unacceptable levels of service

• Completion and approval of NEPA decision document with meaningful public involvement

• Approval of applicable interchange access, design, and environmental permitting by appropriate agencies

• Approval by the Chief Engineer of an IGA for the financing, construction, maintenance, and operations of the proposed facilities.
Jefferson Parkway
Updates, Progress and Next Steps

• Included in 2040 Fiscally Constrained Regional Transportation Plan

• Updated System Level Study and completed Project Level Study

• Project Level Study recommendation for opening day
  • Intersections at SH 93 and SH 128
  • Interchange at SH 72

• Currently working with CDOT on approvals for 1601 at SH 72 and Access Permits at SH 93 and SH 128.
COLORADO DEPARTMENT OF TRANSPORTATION

POLICY DIRECTIVE

Subject
INTERCHANGE APPROVAL PROCESS

Number 1601.0

Effective 10/16/08
Supersedes 12/15/04
Originating Office Division of Transportation Development

Purpose

The purpose of this policy directive is to establish fair and consistent procedures regarding the review and evaluation of requests for new interchanges and major improvements to existing interchanges on the state highway system.

Authority


Background

The Colorado Transportation Commission recognizes that state highways are important to meeting the mobility needs of the public and that it is important to the quality of life and economic health of the state of Colorado for the state highway system to provide safe and efficient interregional and interstate movement of people and goods. To that end, the Commission must manage the location, design, operations and maintenance of interchanges on the state highway system.

Policy

It is the policy of the Commission that all requests for new interchanges and major improvements to existing interchanges on the state highway system be reviewed and evaluated in a fair and consistent manner, that sufficient information be available to make an informed decision, and that duplicative analytical, regulatory and procedural requirements be minimized.

Since each request for a new interchange or interchange modification has its own unique circumstances, the Commission will take into account these unique circumstances in judging the relative merits of each request for a new interchange or interchange modification on facilities owned by CDOT. To that end, the Commission recognizes that there must be flexibility to ensure a level of analysis appropriate to the circumstances surrounding each proposal.

In order to ensure consistency with local plans, needs and priorities, and the ability to have the long term contractual relationships that are necessary to maintain the infrastructure of the state highway system, applicants must be local governmental units. CDOT initiated new interchanges or interchange modifications must comply with the same analytical and procedural requirements as local applicants.
The following general policies will apply to all proposals for new or modified interchanges on the state highway system unless otherwise agreed to by the Transportation Commission:

**Approval of Interchanges and Interchange Modifications:** To balance the need for fair and consistent treatment of all proposals to add a new interchange or modify an existing interchange to the state highway system with the need for flexibility to ensure the level of analysis appropriate to the circumstances surrounding each proposal, the Commission has identified two categories of proposals.

**Type 1:** Proposals for new interchanges on the state highway system with a functional classification of Interstate or Freeway will be submitted to the Transportation Commission for action. The Commission will also take action on other new interchanges or interchange modifications referred to it by the Chief Engineer.

**Type 2:** Proposals for new interchanges not on the interstate or freeway system and modifications to existing interchanges will be submitted to the Chief Engineer for action. The applicant may appeal the Chief Engineer’s decision as it relates to policy to the Transportation Commission.

**Cost Sharing:** The state highway system shall be owned by CDOT. The applicant is responsible for all costs for the development, administration, and evaluation of proposals for new interchanges or modifications to existing interchanges.

The applicant is responsible for all costs including, but not limited to, design, rights of way, construction, maintenance, operations, environmental mitigation and remediation and replacement of structures and ancillary facilities associated with new interchanges in perpetuity.

Responsibility for all costs including, but not limited to, design, rights of way, construction, maintenance, operations, environmental mitigation and remediation and replacement of structures and ancillary facilities owned by CDOT associated with existing interchanges, upgrades of existing intersections on state highways to interchanges, and ancillary facilities on the state highway system will be negotiated through the final Intergovernmental Agreement consistent with the financial plan identified in a Systems Level Analysis.

The Transportation Commission must approve CDOT participation in any cost sharing proposal.

**Connections To The State Highway System:** Interchange connections to the state highway system are intended to improve the operations and safety of the state highway system, serve regional travel purposes or provide access to regional destinations. Therefore interchange connections from state highways must be to regionally significant roadways or regionally significant publicly owned facilities, or result in a significant improvement in the operations and safety of the state highway system.

A regionally significant roadway is defined as a roadway classified as a principal arterial or higher classification in the most recently adopted Metropolitan Planning Organization.
transportation plan in urban areas, or if the roadway has been identified as regionally significant within an adopted Regional Transportation Plan, NEPA/environmental study, feasibility study, corridor optimization plan, or access management plan on which CDOT staff has participated and the Chief Engineer finds acceptable.

Access to local land uses must be provided to the extent reasonable and feasible by the local transportation system.

Approval Process: An initial Intergovernmental Agreement must be developed between the applicant and CDOT addressing responsibility for administrative and application costs, analytical procedures and responsibilities, anticipated level of design detail, approval process, anticipated schedule and other necessary issues following a project scoping meeting between the applicant and CDOT.

The Transportation Commission (for Type I proposals) and the Chief Engineer (for Type 2 proposals) shall take action on a Systems Level Study of the impacts of the proposed interchange or interchange modification on the state and local transportation system and surrounding area. The Systems Level Study must include a preliminary financial plan that identifies which parties are responsible for applicable costs.

Following the Systems Level Study approval, the new interchange or interchange modification proposal must be determined consistent with the applicable fiscally constrained regional transportation plan, receive approval of the applicable environmental documents consistent with the CDOT Environmental Stewardship Guide and receive NEPA approval and access approval by FHWA for all Interstate related proposals.

A final Intergovernmental Agreement, consistent with the approved Systems Level Study and approved by the Chief Engineer, that addresses all necessary commitments by the applicant including, but not limited to, construction, mitigation, operations, maintenance, ownership will be negotiated after the system level study is approved and the applicable environmental and design requirements are addressed.

As an incentive to encourage cooperative corridor planning, a full systems analysis is not required when a proposed interchange or interchange modification is consistent with an approved corridor optimization and access control plan. In such cases, the Chief Engineer may define additional information necessary to ensure the proposed interchange meets acceptable design, safety, operational, and other applicable requirements.

The applicants must demonstrate significant progress towards implementation of the project within 3 years of approval of the Systems Level Feasibility Study by the Transportation Commission or Chief Engineer. If the applicant has not made significant progress toward implementation of the interchange project within 3 years of this approval, the applicant may submit a written request to the Chief Engineer for a one year time extension. No more than two one-year extensions may be granted by the Chief Engineer.
IMPLEMENTATION

This policy shall be implemented by all Regions and Divisions of the Colorado Department of Transportation. A procedural directive shall be developed to provide more specific direction on procedures to implement this policy.

REVIEW DATE

This policy directive shall be reviewed before September 2014.

Transportation Commission Secretary  
Date  
10/22/08