

I-25 CIMARRON INTERCHANGE ENVIRONMENTAL ASSESSMENT REEVALUATION

ATTACHMENT 1

Section 6(f) Documentation for Midland Trail Replacement



COLORADO

Department of
Transportation

Reevaluation

I-25 Improvements through the Colorado Springs
Urbanized Area Environmental Assessment
for

I-25/US 24 (Cimarron Street) Interchange Design-Build Project

DRAFT

**LWCF Section 6(f)
Technical Memorandum**

Introduction

The I-25/US 24 interchange in Colorado Springs, Colorado, as shown in Figure 1, is the connection between Interstate 25 and US Highway 24 West which have both been subjects of recent Environmental Assessments completed and approved by the Colorado Department of Transportation (CDOT) and the Federal Highway Administration (FHWA). The I-25/US 24 interchange was built in 1959 and does not accommodate existing or projected traffic volumes nor does it meet current design criteria.

Improvements to this interchange have been examined twice, first in the March 2004 *I-25 Improvements through the Colorado Springs Urbanized Area EA* (FONSI, September 2004) (I-25 EA) and then in the May 2012 *US 24 West EA* (no decision document issued to date).

The Proposed Action that was adopted in the I-25 FONSI included a tight diamond interchange at the I-25 and US 24 Interchange. The Proposed Action in the subsequent US 24 West EA recommended the following for the I-25/US 24 interchange:

“Build single-point diamond interchange (SPDI) with a loop ramp for eastbound-to-northbound travel at US 24 and I-25. This interchange design replaces the tight diamond interchange identified in the *I-25 Improvements through the Colorado Springs Urbanized Area EA* (CDOT, 2004a). Since that EA was approved, traffic forecasts and future traffic operations have been revised by the Pikes Peak Area Council of Governments (PPACG), making a SPDI design more efficient operationally.” [Chapter 2 – Alternatives, page 2-14, 1st bullet.]

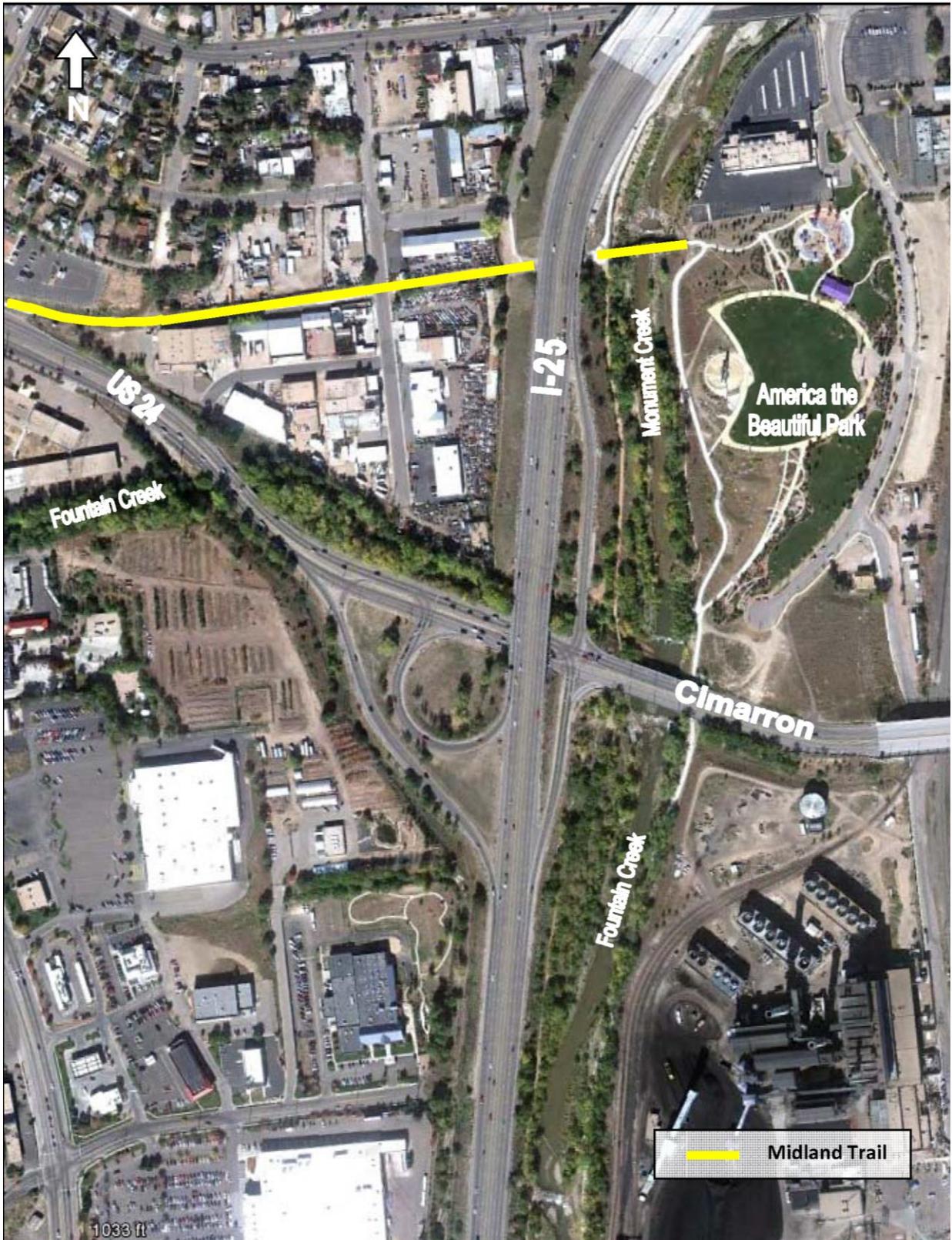
The proposed SPDI design meets the purpose and need for the interchange project, as defined in the 2004 I-25 EA, and has similar impacts as the original tight diamond interchange.

In September of 2004 when the FONSI was signed, there were insufficient funds to implement all of the improvements, so a phased approach was devised. The first phase, known as the “COSMIX” project, involved widening I-25 to six lanes from Circle Drive (Exit 138) to North Academy Boulevard (Exit 150), and was constructed in 2007. Although improvements to several interchanges were included in the COSMIX project, the US 24 Interchange was not included in the first phase of reconstruction. Colorado Department of Transportation (CDOT) has now allocated funds to complete the critical improvements to the I-25/US 24 Interchange.

This reevaluation is being completed to comply with the National Environmental Policy Act (pursuant to 23 CFR 771.129) as this project is:

- Proceeding to the next major approval or action with changes such as laws, policies, guidelines, environmental setting impacts or mitigation,
- Shift from a tight diamond to SPDI, and
- More than three years have elapsed since the Federal Highway Administration’s (FHWA) approval of the FONSI [23 CFR 771.129(b)].

Figure 1. I-25/US 24 Interchange Area



Land and Water Conservation Fund (6(f)) Resources

In 1959, I-25 was built over the Midland railroad line that had been unused since 1949. In 1997, the City of Colorado Springs purchased the railroad corridor for future east-west trail use. The I-25 EA and FONSI proposed widening of the I-25 freeway from South Academy Boulevard to Monument and noted that the railroad corridor was being used as a temporary trail crossing of the freeway. The EA's Proposed Action included replacing the Midland Trail crossing under I-25 (north of the I-25/US 24 interchange) with a new crossing along Fountain Creek (at the interchange). On April 27, 2004 the Colorado Springs City Council unanimously passed a resolution of support for the I-25 proposed improvements including the relocation of the trail.

In 2003, while the I-25 EA was being completed, the City of Colorado Springs applied for and received a \$150,000 Land and Water Conservation Fund (LWCF) grant for development of the Midland Trail that included the section below I-25. The trail, as shown in Figures 1 and 2, was completed by the end of 2004.

Concurrently with trail construction, the City also built a regional park (initially Confluence Park, soon renamed America the Beautiful Park) east of I-25. The LWCF-funded trail project also built a pedestrian bridge across Monument Creek, connecting the park to the Midland Trail. The I-25 trail crossing that the I-25 EA called "temporary" was improved at that time, and has now been used for nearly a decade while the region awaited funding for the interchange reconstruction project. For ground-level photos of the existing crossing, please see attachment A.

Figure 2. Existing LWCF-funded Midland Trail crossing under Interstate 25 in Colorado Springs



Now that funding for interchange reconstruction of this interchange has become available, CDOT is conducting a re-evaluation of the 2004 I-25 EA and has determined that the I-25 Proposed Action will result in a Section 6(f) impact to the Midland Trail.

Note: Per consultation with the Colorado State Historic Preservation Officer, the Midland Railroad grade under I-25 is NOT eligible for listing as an historic resource.

6(f) Resources Impacts, Avoidance and Minimization

In the I-25 EA, numerous alternatives were considered for the I-25/US 24 interchange configuration that would improve safety and accommodate future US 24 traffic and six through lanes on I-25. All alternatives eliminated the substandard 55-year-old I-25 southbound off-ramp loop in the southwestern quadrant of the interchange and replaced it with a southbound off ramp in the northwestern quadrant. A subsequent 2012 EA for US 24 West Corridor Improvements re-examined the proposed I-25/US 24 interchange configuration and recommended a revised design called a SPDI. For all alternatives, the width of I-25 mainline including ramps crossing over the Midland Trail is substantially increased from roughly 120 feet to 260 feet, as shown in Figure 3. For the trail to remain in its current location, the crossing under I-25 would need to more than double in length. Four options were considered for accommodating both the interchange reconstruction and connecting the Midland Trail across the Interstate highway:

1. Replace the existing crossing on the former railroad alignment with a new trail along Fountain Creek, as promised in the approved I-25 EA,
2. Leave the trail in place, and lengthen with a 20 x 20 foot box culvert under I-25.
3. Build pedestrian over I-25
4. Leave the trail in place and construct bridges to carry I-25 over it.

Relevant to all options for a Midland Trail crossing of I-25 is the fact that this area southwest of downtown has a notable presence of homeless persons and criminal activities. The crossing of I-25 needs to be an open, highly visible and accessible area.

Option 1: Providing a new I-25 crossing along Fountain Creek and additional north-south extension, (see 6(f) replacement piece shown in green hatch in Figure 4), to accommodate travel to Colorado Avenue has the advantage of providing a creek side setting for the trail while maintaining access to the Colorado Avenue on-street bike lane. The crossing of I-25 would be much wider along the creek, include aesthetic treatments, and natural lighting. The crossing under I-25 will be built to accommodate the east-west US 24 / Cimarron Street and the creek, with minimal additional expense to accommodate the trail. With the addition of a new trail structure across Monument Creek this trail would provide a more direct

Figure 3. Width of Roadway Over the Existing Trail Alignment



connection to the Pikes Peak Greenway Trail and Cimarron Street. This option is consistent with the City of Colorado Springs Urban Trail System.

Option 2: Lengthening the crossing under I-25 from 120 feet to 250 feet would both be costly and introduce safety concerns. As previously discussed with the Parks Director, trail users are somewhat reluctant to use a long tunnel as they can be trapped there in an isolated place with a potential threat.

Regarding the possibility of lengthening a tunnel under I-25, a similar situation arose at the Monument Park access trail crossing I-25 less than a mile north of the Midland crossing in Colorado Springs. Instead of having a 150 foot long tunnel the City and CDOT ultimately built a pedestrian bridge over the freeway in that location to avoid a confined trail.

Option 3: Constructing a pedestrian bridge over I-25 for the Midland Trail is not a feasible option because I-25 was built 30 feet above the trail, to accommodate the height of the original railroad corridor, and then the pedestrian bridge would be another 20 feet higher. Construction of this bridge would be expensive and more circuitous for the trail user.

Option 4: Leaving the trail in place and constructing bridges to accommodate the 260-foot roadway width above it was estimated to cost \$2 million in 2003, and is now estimated to cost \$5 million. This option would involve the same safety concerns discussed above.

In 2003 and in 2014, CDOT coordinated the development of options with City officials and discussed with the Director and Board of the Colorado Springs Department of Parks, Recreation and Cultural Resources. In a 2003 letter, (attachment B), and reaffirmed in a 2014 letter, (Attachment C), from the Colorado Springs Department of Parks, Recreation and Cultural Resources, the first option was approved by the City. The 2003 letter noted that the expense to construct Option 4 would have been “fiscally unwise”, given the availability of an inexpensive, reasonable crossing opportunity nearby (i.e. Option 1).

Summary of Section 6(f) Property Conversion and Mitigation

Option 1 was selected to address the Midland Trail I-25 crossing. This option, as shown in Figure 4, closes the existing crossing under I-25, shown in red in Figure 5, and reroutes the trail along Fountain Creek. At the Fountain Creek and Monument Creek confluence a new pedestrian bridge will be constructed to provide direct access to America the Beautiful Park, the Pikes Peak Greenway Trail, and Cimarron Street. A new connection from the realigned Midland Trail at Fountain Creek on the west side of the interchange will be constructed north to the existing Midland Trail. This portion of the trail, shown in green in Figure 5, will be the mitigation for the closure of the existing crossing and will be conveyed to the City of Colorado Springs and maintained in perpetuity as a Section 6(f) encumbered property. At the western portal of the existing trail under I-25 an additional extension will be made to Walnut Street for trail users to access Colorado Avenue.

An April 2014 Real Property Appraisal Report by CDOT Right-of-Way Services details the current market value of the Midland Trail property that would be converted to highway use and the value of the

mitigation property for the proposed new Midland Trail crossing of I-25. The existing trail connection is shorter in length, the value of the new connection (land plus trail improvements) is considerably greater than the value of the impacted Section 6(f) property.

The impacted property was determined to be 20 feet wide and 260 feet long, shown in red in Figure 4, for a total of 5,200 square feet. This is approximately 0.12 acre, representing a very small fraction of the 12.52 acre property that Colorado Springs purchased from the Union Pacific railroad in 1997. This land is valued at \$11,900, and the value of the existing trail improvement on the land is another \$15,600, for a total property value of \$27,500.

The longer, replacement trail property, shown in red in Figure 4, is estimated to be also 20 feet wide, but 615 feet long, for a total area of 12,270 square feet, valued at \$30,100, which is greater than the value of the impacted Section 6(f) property. The estimated cost of building a trail on this land, of equal specifications and amenities as the impacted trail, would be an additional \$67,000. Thus, the total value of the replacement trail will be \$97,100. It should be noted that the replacement parcel is being purchased from a private owner.

Comparing the two properties, the mitigation property is valued at \$69,600 more than the impacted Section 6(f) property. The replacement resource is valued at 3.53 times as much as the impacted property.

Figure 4. Trail Network

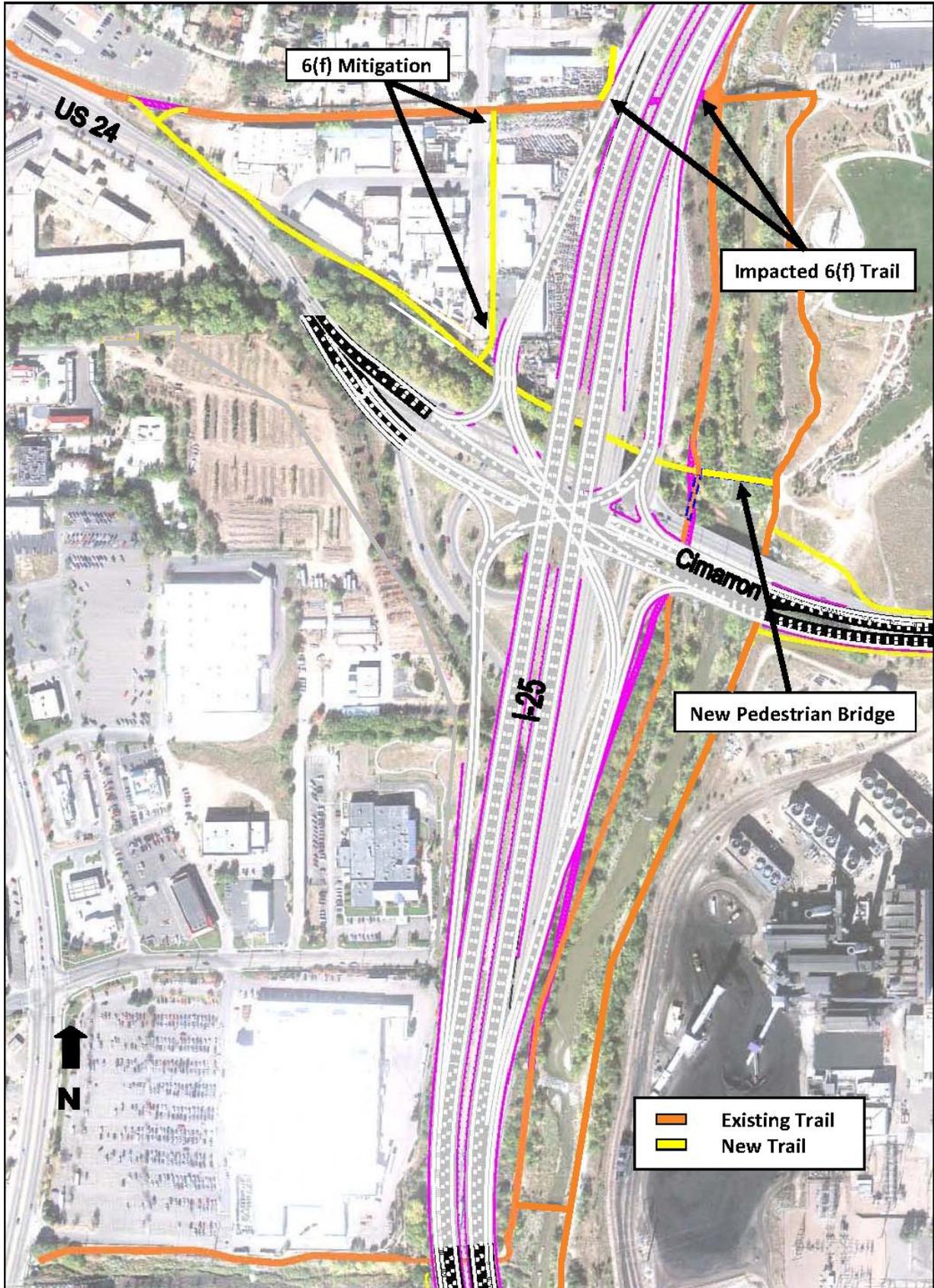
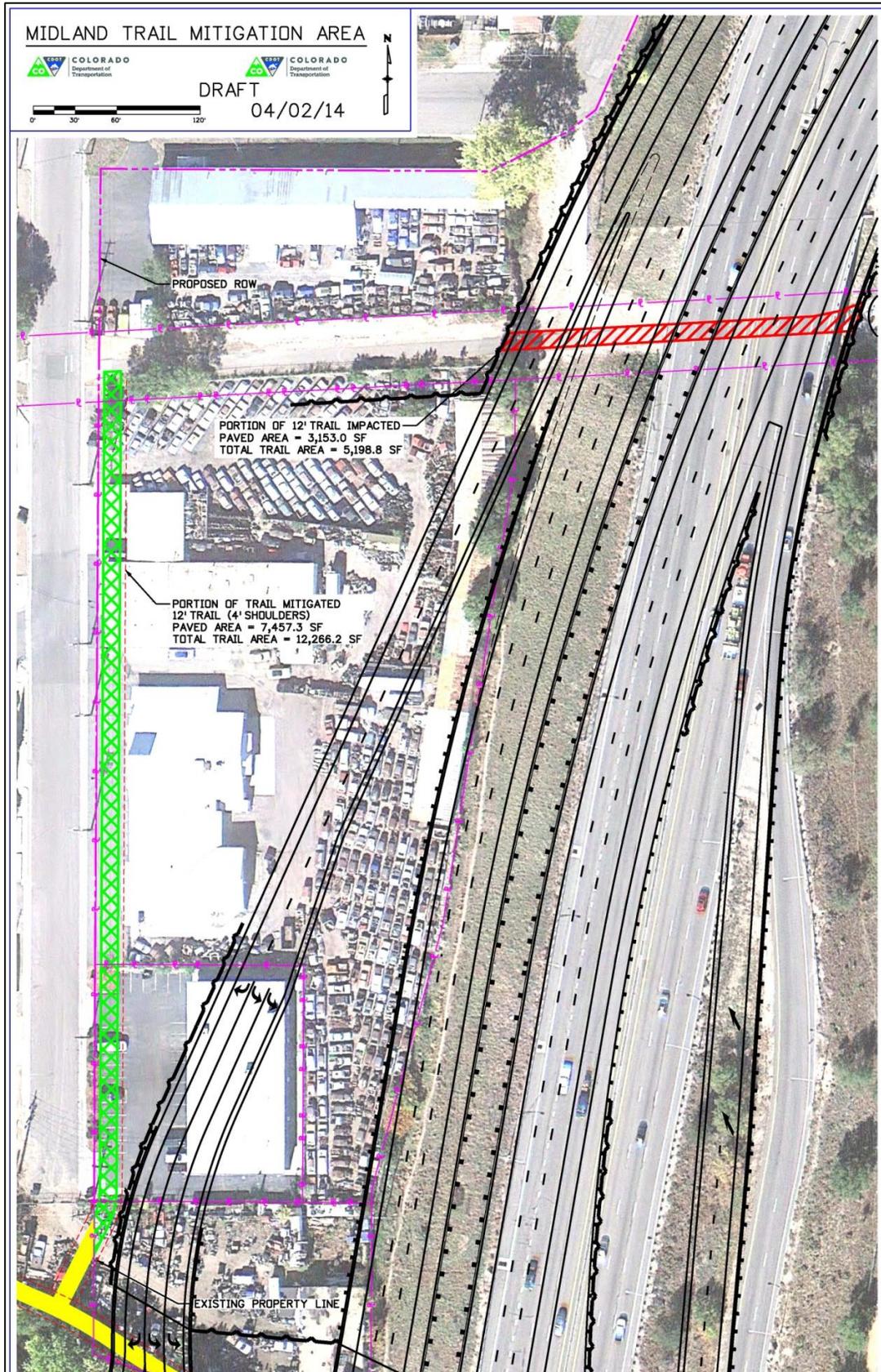


Figure 5. Conversion/Mitigation Parcel



Concurrence

Because LWCF grant monies were used to build the Midland Trail on the City's land, the trail segment to be affected by the I-25/US 24 interchange reconstruction project is considered to be a resource protected under Section 6(f) of the LWCF statute. Conversion of Section 6(f) property and acceptance of substitute mitigation property thus requires concurrence from the United States Department of Interior (USDOI) National Parks Service, and its designee agency, Colorado Parks and Wildlife (CPW), which is part of the Colorado Department of Natural Resources.

ATTACHMENT A



View westward of Midland Trail crossing under Interstate 25, away from the Pikes Peak Greenway.



View eastward of Midland Trail crossing under Interstate 25, towards the Pikes Peak Greenway.

ATTACHMENT B



MEMORANDUM

CITY OF COLORADO SPRINGS

Date: March 4, 2003
To: Colorado Springs Parks and Recreation Advisory Board
From: Paul D. Butcher, ^{PDB} Director, Parks, Recreation and Cultural Services
Subject: Issues Surrounding Confluence Park

At the February 13, 2003 Parks Board meeting, two issues were raised regarding the presentation on Confluence Park progress. As a result of the Board's interests in these two matters (interstate traffic noise and east-west trail access across I-25) a meeting was set with the I-25 consulting firm Wilson and Company. On February 27 City staff members (Paul Butcher, Jim Reas and Fred Mals) met with Wilson and Company staff to discuss these two items.

NOISE

Wilson and Company provided a noise contour map for the park, indicating the projected noise contour lines for full build-out and traffic volumes in the year 2025. The site map indicated a 71 dB(a) contour line and a 66 dB(a) contour line. The 88 dB(a) line protruded farthest into the park, probably reaching the area of the proposed fountain/sculpture feature. While discussing this issue, the following facts were laid out:

1. The interstate will probably be twenty feet above the general elevation of the park.
2. Because of the topography adjacent to the east side of I-25 (steep drop-off) any noise wall would have to be directly attached to the highway shoulder. For the most part, the highway will be cantilevered through this section.
3. In order to be effective, the noise wall would need to be fifteen to twenty feet high to provide the required 5 dB(a) noise reduction. The wall would also need to extend past the ends of the park to avoid the noise going around the wall.

In looking at these facts, and relying on one of the basic design tenets of this park (that it be visible from the interstate), staff rejected the notion to pursue further work on a potential noise barrier. City staff did ask if any design features for this section were available to might help deaden noise, particularly fire noise. One suggestion made by Wilson and Company was that the safety barriers (guard rails) could be designed to have no open space between the support posts. An additional thought was to use the traditional concrete jersey barrier as a sound-deadening feature. Wilson staff indicated that typically these safety barriers were approximately three feet high, which would allow for viewing into the park, but would provide only a 1dB(a) noise reduction.

City staff felt that the views into and out of the park were of much higher importance to the visual quality of Confluence Park than the noise reduction issue. Staff's feedback to Wilson was to involve the City in the design process when it came time to work on the safety barrier aspect of the interstate.

TRAIL ACCESS

Following the discussion on noise issues, City staff asked Wilson and Company as to what the possibilities were to keep the old railroad underpass open to provide additional access from the west side of the interstate to the park. Through an examination of the preliminary designs available for this section of the interstate:

1. At the section of the interstate where the existing railroad bed lies, the new roadway will be approximately 150 feet wide (shoulder to shoulder). This represents a considerable length if a tunnel were to be considered, not only from a cost perspective but also from a perceived "user safety" perspective. One of the primary reasons the old access tunnel in South Monument Valley Park was closed (in favor of a pedestrian overpass) was that 50 yards was thought to be an uncomfortable tunnel distance for users to traverse and feel personally safe. Additionally, there is no opportunity at this stage in the highway design to create an opening above the tunnel to the road surface, which might help in alleviating the claustrophobic nature of a long tunnel.
2. The second option examined was to design this section as a short bridge over the trail thus eliminating the need for an enclosed tunnel. Preliminary cost estimates were that such structures (one northbound, one southbound) would have a combined construction cost of \$2.0 million, which would represent a sizable investment in highway resources.

Staff again reaffirms its position that the access points at the north and south ends of Confluence Park are sufficient to meet the needs for park users. It seems fiscally unwise to require a mid-park crossing given the preliminary expenses tied to that effort.

Staff will be available to answer questions on either of these items.

ATTACHMENT C



May 14, 2014

Lesley Mace
Project Manager
Colorado Department of Transportation
1480 Quail Lake Loop
Colorado Springs, CO 80906

**RE: The City of Colorado Springs Parks and Recreation Advisory Board
I-25 / Cimarron Street (US 24) Interchange Design-Build Project**

Thank you for the opportunity over the past several months to review and provide comment on the Midland Trail Relocation and the noise impact along America the Beautiful Park (previously known as Confluence Park). As you are aware, we took your findings through a three-step process: an internal review by Parks, Recreation and Cultural Services staff members, a public presentation of the information to the Parks and Recreation Advisory Board on March 14, 2014, and a second presentation for action to the Parks and Recreation Advisory Board on April 10, 2014. We are pleased that there was close consensus between both staff and the Board on the following key issues:

Midland Trail Realignment:

As part of the I-25 Environmental Assessment, previous action was taken by the Parks Advisory Board on December 12, 2002 regarding the realignment of the Midland Trail. The Board approved the relocation of the trail from its current location to the north bank of Fountain Creek. This will close the Midland Trail connection under the interstate. The Colorado Department of Transportation is proposing to make these changes as part of the I-25 / Cimarron Street (US 24) Interchange Design-Build Project.

Because portions of the Midland Trail were constructed using funds allocated by the Land and Water Conservation Fund Act of 1965, the impacts to the trail require CDOT to conduct a "Section 6(f)" evaluation for realignment and reconstruction. Section 6(f) requires that any permanent impact to an encumbered property be mitigated at least on a one to one basis with similar quality and value. CDOT will assure that there is an equal value exchange for the Section 6(f) property acquired. Such exchange will be valued according to the requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 for both the property acquired and for any properties used as a part of the payment. Appraisals are conducted as part of CDOT's right-of-way process.

In addition to the trail relocation, CDOT will construct a pedestrian bridge across Monument Creek to complete the trail system. The proposed bridge will be a standard continental pedestrian bridge structure. The City of Colorado Springs has agreed to and will be responsible to maintain the relocated Midland Trail as a Section 6(f) encumbered property in perpetuity.

Noise:

As part of the I-25 Environmental Assessment, previous action has been taken by the Parks Advisory Board on December 12, 2003 regarding the noise impact from the proposed interchange improvements. The current Parks Advisory Board,

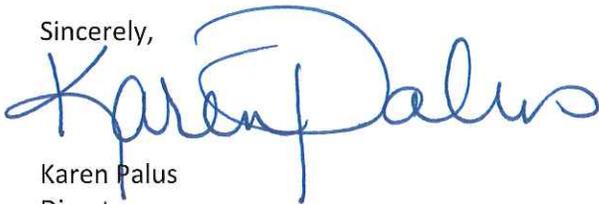
as reflected in their formal vote, concurred with the previous Board's action that the visual quality, views into and out of America the Beautiful Park (previously known as Confluence Park), were of much higher importance than noise mitigation. The Parks Advisory Board acknowledges that CDOT will not construct a noise mitigation wall in this location. However, the Parks Advisory Board does request a solid guard rail along I-25 to obscure the lower half of cars passing the park and possibly soften tire noise.

CDOT will continue to integrate Parks, Recreation and Cultural Services staff members in the interchange design reviews to ensure compatibility of the Interchange improvements with the America the Beautiful Park and Trail network. We are excited about the collaborative process that has transpired to date and recognize the enhancements this project will provide to our community.

If any changes occur as part of the design build process, CDOT will present the changes to the Parks Board for consideration and approval.

If you have any additional questions or need additional information, please do not hesitate to contact me at 719.385.6501.

Sincerely,



Karen Palus
Director

----- Forwarded message -----

From: **Halouska - CDOT, Troy** <troy.halouska@state.co.us>

Date: Thu, Sep 25, 2014 at 10:41 AM

Subject: Fwd: I-25 & US 24 Interchange Reconstruction Project - Section 6(f) Approval

To: Robert Frei - CDOT <robert.frei@state.co.us>

Cc: Lisa Streisfeld - CDOT <lisa.streisfeld@state.co.us>

Hello Rob,

I just received the email from CPW that we needed to complete the Section 6(f) NEPA process. NPS and CPW have agreed that the process is being conducted appropriately. Please include this email in the project file.

Once we get into construction and the ROW process is complete, we can continue with the official conversion request as outlined below. Please ensure that the appropriate folks are aware that this process needs to be completed before the project can be closed out.

If you have any questions or concerns, please do not hesitate to contact me.

Troy Halouska
Planning and Environmental Linkages Program Manager, 4(f)/6(f) Specialist



Phone 303.757.9794

4201 E. Arkansas Ave., Shumate Building, Denver, CO 80222

troy.halouska@state.co.us | www.coloradodot.info

----- Forwarded message -----

From: **Gose - DNR, Melanie** <melanie.gose@state.co.us>

Date: Thu, Sep 25, 2014 at 10:11 AM

Subject: Re: Interstate 25 & US 24 Interchange Reconstruction Project in Colorado Springs

To: "Halouska - CDOT, Troy" <troy.halouska@state.co.us>

Cc: Thomas Morrissey - DNR <thomas.morrissey@state.co.us>

Hi Troy,

The National Park Service has reviewed the letter to reconstruct the I-25 and US 24 interchange. The National Park Service and Colorado Parks and Wildlife understand the 6(f) process is being followed and have no objections to the proposed highway project. Once the planning has been finalized and the construction is set to begin we will need to complete the paperwork that was outlined in the email sent September 10th.

If there is anything else needed at this time, please let me know.

Thanks,
Melanie

Melanie Gose
Federal Grants Administrator
State Trails Program



On Wed, Sep 10, 2014 at 9:51 AM, Gose - DNR, Melanie <melanie.gose@state.co.us> wrote:
Hi Troy,

Tom submitted the I-25 & US 24 Interchange Reconstruction Project along the Midland Trail to the National Park Service. To complete the conversion process additional forms are required. Kelly Pearce with the NPS has listed what is needed in her email below. I will fill out the Amendment, SF424, and DNF forms. What we need from the City of Colorado Springs is the PD-ESF form and the 6(f) Boundary Maps.

The PD-ESF is attached, Steps 3B and Steps 5 through 7 will need to be filled out for each property. One form for the converted property and one form for the replacement property.

Two 6(f) Boundary Maps need to be submitted, one for the remaining property resulting from the conversion and one for the replacement property. The following are required to be on the 6(f) boundary maps:

- LWCF Project Name : Midland Trail and Pedestrian Bridge
- LWCF Project Number: 08-01077
- Date the map is submitted
- Township, Range, and Section
- Clearly label the project site legal beginning and ending points
- Acreage
- Longitude and Latitude
- North Arrow
- The Project Boundary should be outlined in red

Kelly didn't see a reference to compliance with Section 4(f) of the Dept. of Transportation Act. Has this been accomplished?

Please forward the PD-ESF and the boundary maps to me once completed, I will put all the forms together and send them to the National Park Service.

Let me know if you have any questions.

Thanks,
Melanie

----- Forwarded message -----

From: **Pearce, Kelly** <kelly_pearce@nps.gov>

Date: Wed, Jul 30, 2014 at 8:20 AM

Subject: Re: Interstate 25 & US 24 Interchange Reconstruction Project in Colorado Springs

To: "Morrissey - DNR, Thomas" <thomas.morrissey@state.co.us>

Cc: Melanie Gose <Melanie.Gose@state.co.us>

I have reviewed the attached documents and everything looks good.

In order to complete the conversion process we will need the following forms/information.

1. Amendment to the project agreement form identifying changes to the original Section 6(f)(3) boundary caused by the conversion and to establish a new 6(f)(3) boundary around the replacement site. We will need 3 hand-signed copies.
2. Signed SF 424
3. Description and Notification Form (DNF). The only things that have to be filled out on the DNF is the main text at the top of the form along with the Park Information box and anything that has changed. In the case of this conversion, the following would be annotated on the DNF:
 - a. State
 - b. Grant #
 - c. Amend #
 - d. Grant Name (original grant name)
 - e. Park Information Box (for the converted site the Total Number of 6(f) Acres at Park would be the new acres (the original acres - converted acres = new acres)
 - f. Special Indices would be checked for X. Grant involved conversion

The second page of the DNF would be filled out the same for the replacement property but New 6(f) Acres at Park would be annotated with the amount of replacement acres.

4. PD-ESF. The one environmental screening form portion would need to be completed for the converted and one for the replacement property.
5. Need to document how the proposed conversion and replacement property are in accord with your SCORP. This should be stated in Section 2.D.10 of the PD-ESF.
6. Signed and dated (by SLO or ASLO) Section 6(f)(3) boundary maps - one for any remaining parkland resulting from a partial conversion and one for the replacement property.

All of the above listed forms can be found on our website at www.nps.gov/lwcf under "publications, logo & forms."

There is no reference to compliance with Section 4(f) of the Department of Transportation Act. Has that been accomplished?

Give me a call if you have any questions.

Kelly Pearce
Program Officer
State & Local Assistance Programs
National Park Service

Midwest Region
601 Riverfront Drive
Omaha, NE 68102
Phone: [402-661-1552](tel:402-661-1552)
Fax: [402-661-1553](tel:402-661-1553)

On Tue, Jul 22, 2014 at 11:58 AM, Morrissey - DNR, Thomas <thomas.morrissey@state.co.us> wrote:

Ms. Kelly Pearce

Program Officer, National Park Service

Dear Ms. Pearce:

Welcome to your new duties with the National Park Service. As the NPS Program Officer for Colorado's Land and Water Program, I respectfully request your attention to the project described herein.

Attached please find a letter from the Colorado Department of Transportation (CDOT) outlining their plans to reconstruct the Interstate 25 (I-25) and US Highway 24 Interchange (Cimarron Street) in Colorado Springs (the City). CDOT and the City are specifically requesting approval from the State of Colorado to convert a portion of the Midland Trail, a Section 6(f) property, which crosses beneath I-25 in this location. The Midland Trail was built in 2003 and runs parallel to US 24 from Colorado Spring's America the Beautiful Park west to Ridge Road with a short section missing between 21st Street and 25th Street. This email focuses on that section of the Section 6(f) property affected by CDOT's interchange project and the proposed mitigation to address its conversion to non-recreational uses.

CDOT and the City have performed a thorough evaluation of construction alternatives and are now preparing a Reevaluation of a 2004 Environmental Assessment (EA) and Finding of No Significant Impact (FONSI) for their preferred alternative. Refer to the Reevaluation Technical Memorandum attached. The realignment and interchange alternative selected will close the I-25 Midland Trail underpass beneath I-25 and result in a conversion of the Section 6(f) property to non-recreational use.

The attached letter dated July 10, 2014 addressed to myself from CDOT precisely identifies the Midland Trail segment impacted and converted by the project and the mitigation plan prepared by the City and CDOT to address and compensate for the conversion of the Section 6(f) lands to non-recreational uses.

The Colorado Parks and Wildlife (CPW) Division has reviewed the compensation measures proposed by CDOT and the City and endorses their planning analyses utilized to select the preferred alignment and the mitigation plan proposed to address the conversion of Section 6(f) lands. In addition to the letter referenced above, a letter dated May 14, 2014, expresses the City's concurrence with CDOT's plan for the reconstruction of the interchange and the mitigation plan to compensate for the loss of 6(f) lands. The subject letter is attached as Attachment B to the Reevaluation Technical Memorandum.

CPW respectfully requests the National Parks Service's concurrence with this request to convert the referenced Section 6(f) property in the City of Colorado Springs and the mitigation plan proposed.

Thank you for your attention to this important matter and please contact myself or Melanie Gose should questions arise from this request to approve the measures proposed to convert and mitigate for Section 6(f) lands lost.

--

Thomas M. Morrissey, PE
Colorado's LWCF State Liaison Officer
State Trails Program Manager



COLORADO

Parks and Wildlife

Department of Natural Resources