

**I-25 CIMARRON INTERCHANGE  
ENVIRONMENTAL ASSESSMENT REEVALUATION**

I-25 MILEPOSTS 140.8 to 141.4  
COLORADO SPRINGS, COLORADO

CDOT REGION 2  
PROJECT NUMBER IM 0252-423  
SA 19039

December 2014

FHWA Review Copy





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1	Section 6(f) Documentation for Midland Trail Replacement
2	Section 4(f) Documentation for Trail Impacts
3	2014 Traffic Noise Analysis and Abatement Documentation
4	Clean Water Act Section 404 Permits from USACE
5	I-25 Cimarron Interchange Project Floodplain Development Permit
6	Phase I & II Environmental Site Assessment for Interchange Northwestern Quadrant, Asbestos and Lead-Based Paint Assessments, and Additional Express Inn Data
7	2014 Section 106(f) Historic Properties Consultation Documentation
8	Stakeholder Process

## LIST OF ACRONYMS

ARE	Additional Requested Element
CDOT	Colorado Department of Transportation
CDPHE	Colorado Department of Public Health and Environment
CFR	Code of Federal Regulations
CPW	Colorado Parks and Wildlife
EA	Environmental Assessment
FACWet	Functional Assessment of Colorado Wetlands
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
FHWA	Federal Highway Administration
FONSI	Finding of No Significant Impact
HOT	Homeless Outreach Team
I-25	Interstate Highway 25
LWCF	Land and Water Conservation Fund
MS4	Municipal Separate Stormwater System
NPS	National Parks Service
ROW	Right-of-way
SPDI	Single Point Diamond Interchange
T & E	Threatened and endangered
TUDI	Tight Urban Diamond Interchange
US 24	US Highway 24
USACE	U.S. Army Corps of Engineers



# 1. INTRODUCTION

The March 2004 *I-25 Improvements through the Colorado Springs Urbanized Area Environmental Assessment* (I-25 EA) evaluated impacts for the widening of 26 miles of I-25 between South Academy Boulevard in Colorado Springs and State Highway 105 in Monument, together with reconstruction of various I-25 interchanges within this corridor as shown in Figure 1 from the I-25 EA.

This reevaluation is for the reconstruction of the Cimarron Interchange which was evaluated under the I-25 EA and FONSI. The US 24 West Environmental Assessment (US 24 EA) reviewed the interchange design to ensure compatibility with the improvements proposed for US 24 West. The interchange Improvements are considered a separate action from the US 24 improvements and were thus not included in the proposed action of the US 24 West FONSI. However, since they were evaluated with the US 24 EA they are discussed as part of this I-25 EA reevaluation. Furthermore, rather than go to each of the affected landowners twice, first to acquire land for the I-25 project and later to acquire land for the US 24 project, CDOT will acquire the combined ultimate right-of-way (ROW) for both projects as it prepares to construct the I-25 Cimarron interchange.

The stated project purpose on page 1-4 of the approved 2004 EA was as follows:

*The purpose of the proposed corridor improvement project is to relieve existing traffic congestion and address projected future congestion on I-25 within the Colorado Springs Urbanized Area.*

The I-25 EA addressed a 26-mile freeway corridor with a number of interchanges, including the Exit 141 interchange that serves Cimarron Street and US Highway 24 at the edge of downtown Colorado Springs. Page 3-5 of the approved EA indicated that the I-25 Cimarron interchange was opened in 1959, which means that now in 2014 it is 55 years old. Regarding design life, note that an adjacent Cimarron Street

Figure 1. I-25 EA Project Limits



Source: I-25 EA, Page 1-2, 2004

1 bridge built at the same time was replaced by the City of Colorado Springs in 2008 after it began to fall  
2 apart in 2006.

3 Not only has the interchange exceeded its 50-year expected design life, but it also does not meet  
4 modern design standards. The Proposed Action of the approved EA included recommended  
5 reconstruction of the I-25 Cimarron interchange to bring it into compliance with modern design  
6 standards so that it could better meet existing and future traffic demand.

7  
8 When the I-25 FONSI was signed in September 2004, there were insufficient funds to implement the  
9 entire 26-mile project all at once, and some of the improvements were not needed in the short term, so  
10 a phased approach was developed. Page 2-10 of the EA specified the following conceptual phasing:  
11

- 12 (1) initially, widen I-25 to six through lanes through central Colorado Springs,
- 13 (2) then, widen I-25 to six through lanes in northern El Paso County,
- 14 (3) and finally, add HOV [High-Occupancy Vehicle] lanes through central Colorado Springs and  
15 widening I-25 to six through lanes south to South Academy Boulevard.  
16

17 Interchange reconstruction along the corridor would occur in conjunction with these phases as needed  
18 and as funding became available.  
19

20 Considerable progress has been made in implementing the I-25 EA Proposed Action over time, including  
21 the following projects:

- 22 • 2007 - The first of these conceptual phases was completed in central Colorado Springs. The  
23 project, referred to as “COSMIX”, resulted in 12 miles of six-lane freeway, between South Circle  
24 Drive (Exit 138) and North Academy Boulevard (Exit 150). It included major reconstruction at  
25 several interchanges, but notably not including the Cimarron Street interchange (Exit 141) or the  
26 Fillmore Street interchange (Exit 145).
- 27 • 2009 - The Baptist Road interchange (Exit 158) was reconstructed in a collaborative effort with the  
28 Baptist Road Rural Transportation Authority.
- 29 • 2012 - CDOT received funding to begin the second phase, which is to widen I-25 to six lanes in  
30 northern El Paso County between Woodmen Road (Exit 149) and SH 105 (Exit 161) including  
31 modifications to the Northgate interchange. An EA reevaluation was completed (2012) for this  
32 phase of I-25 and for the grading of a portion of the future North Powers Boulevard connection  
33 with I-25. This construction project is being delivered as a design/build project and is scheduled to  
34 be completed by the end of 2014.
- 35 • 2014 – Funding was identified and an EA reevaluation was completed to enable the Fillmore  
36 Street interchange to be reconstructed as a diverging diamond interchange configuration, which  
37 differs from the configuration previously proposed by the I-25 EA (a single point urban  
38 interchange - SPU). The project is scheduled to begin construction by the end of 2014.
- 39 • 2014 - CDOT, the City of Colorado Springs, and El Paso County allocated funds to reconstruct the  
40 I-25 Cimarron Interchange.  
41

42 This reevaluation is being completed to comply with the National Environmental Policy Act (pursuant to  
43 23 CFR 771.129) as the I-25 Cimarron interchange project:

- 44 • Proceeds to the next major approval or action with changes such as laws, policies, guidelines,  
45 environmental setting impacts or mitigation, and
- 46 • Changes the project design from a tight urban diamond interchange (TUDI) to a single point  
47 diamond interchange (SPDI).

## 2. PROPOSED ACTION

### A. Revised Interchange Configuration

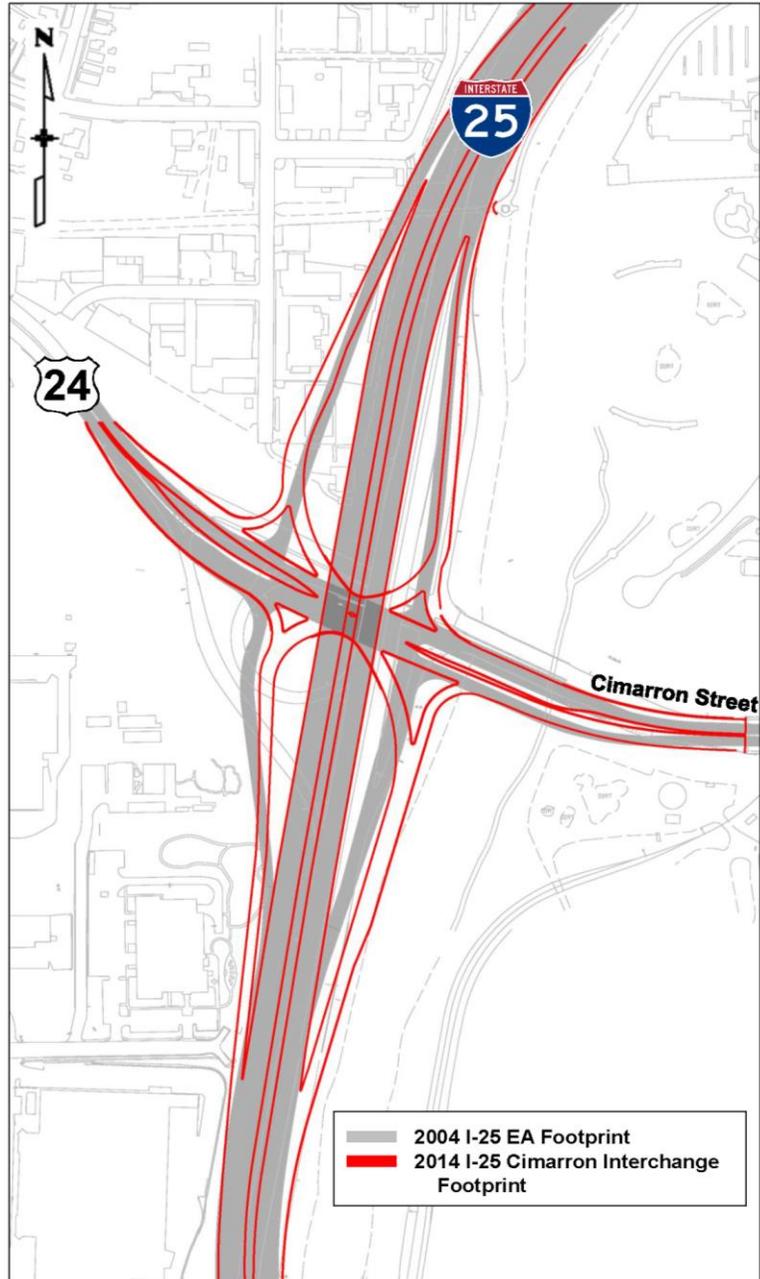
The I-25 Cimarron interchange in Colorado Springs, Colorado, is the connection between Interstate 25 and US Highway 24 West. The I-25 Cimarron interchange was built in 1959 and does not accommodate existing or projected traffic volumes nor does it meet current design criteria. Improvements to this interchange have been examined twice, first in the 2004 I-25 EA and then in the May 2012 US 24 EA. The US 24 EA revised the proposed design for the interchange, to be implemented as part of I-25 improvements, not part of the US 24 Proposed Action.

In 2004, to meet traffic demand in the year 2025, the I-25 EA recommended that the Cimarron interchange be reconstructed as a TUDI. In 2012, to meet traffic demand in the year 2035, the US 24 EA recommended reconstruction to an SPDI instead. Figure 2 compares the old and new project footprints. The prior TUDI (gray) design has two signalized intersections with four signal phases, handling ramp traffic on both sides of the freeway, with a short pavement distance between them, while the current SPDI (red) design has a single, three-phase signalized intersection handling all ramp traffic, normally underneath the freeway. Also, compared to the TUDI, the SPDI pushes the freeway ramps outward to be able to achieve free-flowing angles (not 90 degrees) at the intersection beneath the freeway.

The US 24 EA also called for additional future improvements (e.g., loop ramp in southeastern quadrant of this interchange) which are not part of the current I-25 Cimarron interchange project. The current I-25 project accommodates and does not preclude the future US 24 improvements. Approved by CDOT and FHWA in October 2014, the US 24 FONSI clarifies that:

- the TUDI is being built as part of the current I-25 corridor improvements
- the US 24 corridor project will include future improvements at this interchange
- the future US 24 improvements are not a subsequent phase of this I-25 interchange project

Figure 2. I-25 Cimarron Interchange Area



1 Because I-25 has already been reconstructed both north and south of the Cimarron interchange, based  
2 on the previously recommended TUDI configuration, there is very limited flexibility with regard to the  
3 footprint within the constrained project area, and thus the new SPDI design impacts vary only slightly  
4 from the previous TUDI design. This 2014 reevaluation reports the changed impacts resulting from the  
5 current, proposed SPDI design. The proposed basic configuration, shown in Figure 3, meets the purpose  
6 and need for the interchange project, as defined in the 2004 I-25 EA.  
7

## 8 B. Design/Build Additional Requested Elements 9

10 CDOT intends to use the Design/Build approach for I-25 Cimarron interchange project delivery. The  
11 successful bidder for the construction project will have extensive input into the project final design.  
12 Additionally, as part of the bidding process, CDOT has identified the following Additional Requested  
13 Elements (AREs), which are included in the Final Request for Proposals (published July 24, 2014) for the  
14 project. These elements may or may not be included in the contractors' bid and final design:  
15

16 ARE No. 1 – Full Width I-25 Bridge: All the additional work necessary to replace the existing I-25 Bridge  
17 over Cimarron and Fountain Creek (Str. # I-17-DG) with a full-width bridge structure that fully conforms  
18 to the ultimate I-25 lane and shoulder configuration. This ARE is fully consistent with the I-25 EA, as it  
19 provides today for the additional bridge structure that will be needed to accommodate the future High  
20 Occupancy Vehicle (HOV) lanes. Funding is not available at this time for the HOV lanes portion of the EA  
21 Proposed Action, but bridge reconstruction affords an opportunity to reduce future cost and traffic  
22 disruption by building the needed bridge structure now in conjunction with the interchange project.  
23

24 ARE No. 2A – Widen US 24 Bridge over Fountain Creek and provide additional lanes to 8th Street: This  
25 ARE is consistent with the I-25 EA, as it provides operational benefits to the interchange with additional  
26 auxiliary lane lengths for both eastbound and westbound from I-25 southbound off-ramp to 8th Street,  
27 and provides additional eastbound left turn storage at the I-25 ramp intersection.  
28

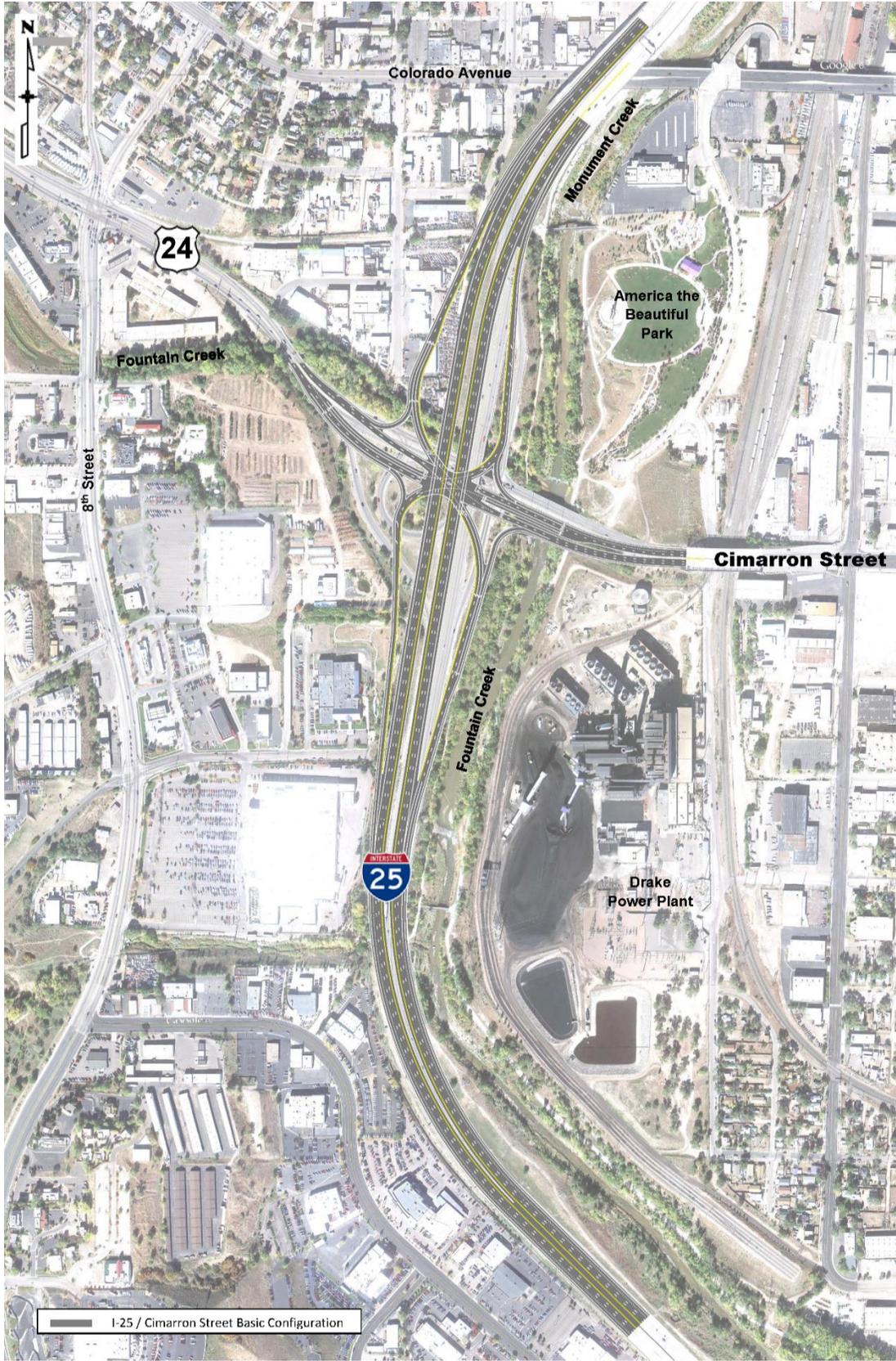
29 ARE No. 2B – Replace US 24 Bridge over Fountain Creek and provide additional lanes to 8th Street: This  
30 ARE is consistent with the I-25 EA, as it provides operational benefits to the interchange with additional  
31 auxiliary lane lengths for both eastbound and westbound from I-25 southbound off-ramp to 8th Street,  
32 and provides additional eastbound left turn storage at the I-25 ramp intersection. This ARE also  
33 provides roadway improvements to US 24 to conform to a 40 miles per hour design speed west of I-25  
34 and stream improvements to Fountain Creek under the new bridge.  
35

36 ARE No. 3 – Provide additional trail and stream improvements along Fountain Creek: This ARE addresses  
37 stream improvements and trails which do not need additional environmental analysis in this  
38 reevaluation because they were included in the US 24 EA and FONSI. The stream improvements would  
39 include a wider high flow channel, sinuous low flow channel, and vegetation removal to increase flow.  
40 Benches within the high flow channel trapezoid will support riparian habitat. Constructing these  
41 improvements as part of the design build project provides a more efficient and less disruptive one-time  
42 completion of Fountain Creek restoration between the previous Gold Hill Mesa project to the west  
43 (which ended at 8<sup>th</sup> Street) and I-25 interchange creek improvements.  
44

45 ARE No. 4 – Provide contractor-defined additional requested elements: This ARE consists of contractor  
46 contractual commitments to provide additional work that enhances operations on US 24 and at the I-25  
47 and US 24 Interchange. This provides the contractor flexibility to propose other design features or  
48 modifications, as long as they are within the footprint of this reevaluation. Any design modifications that  
49 increase environmental impacts beyond what has been considered and documented here would require  
50 additional environmental evaluation.

1  
2

Figure 3. I-25 Cimarron Interchange Proposed Action



3

### 3. ENVIRONMENTAL RESOURCES UPDATE

The pages which follow present a recap of the I-25 EA and US 24 EA findings for the interchange area and the reevaluation findings. Environmental resource discussions are presented in accordance with their order shown in Table 1.

**Table 1. Summary of Findings of I-25 Reevaluation for Cimarron Interchange, by Resource**

<b>NEW PROJECT IMPACTS IDENTIFIED AND ADDRESSED</b>	
Section 6(f)	Midland Trail relocation is now a Section 6(f) resource conversion due to receipt of a Land and Water Conservation Fund (LWCF) grant for this trail.
Section 4(f)	In addition to EA-identified trail impacts, the project will result in temporary closure (“temporary occupancy”) of the east bank Pikes Peak Greenway trail that did not exist at the time of I-25 EA.
<b>RESOURCES WITH UPDATED ANALYTICAL TOOLS, NEW REGULATIONS, OR NEW DATA CONSIDERED</b>	
Air quality	New emission factor model available, but new analysis not warranted.
Traffic noise	New noise model and analysis guidelines, but no mitigation required; Reanalysis with the TNM model clarifies noise levels for the Humane Society property, now expected to be 74 decibels at their entrance and 71 decibels at their property line.
T & E species	Updated species lists reviewed; no T&E species present in interchange area.
Fish and wildlife	Proposed Action includes stream modification benefitting fish movement.
Wetlands	FACWET tool and USACE supplements in use now did not exist in 2004; no wetlands in project area; Section 404 permit approved in 2014 for this project.
Historic	Additional resources evaluated; interchange project has no effects.
Vegetation/noxious weeds	Additional noxious weed species found in project area; no change to mitigation approach.
Hazardous materials	Updated information collected, including a 2014 Phase II Environmental Site Assessment; no change to mitigation approach.
Environmental justice	2010 Census data reviewed, no issues; increased presence of homeless persons in the project area calls for expanded outreach for their safety during construction.
Economic resources	New data: US 24 EA included in-depth economic impacts assessment.
Right-of-way	Project-specific right-of-way needs clarified for current proposed configuration; SPDI design has resulted in several additional acres of needed acquisitions, with no new business or residential relocations.
Visual resources	Project design details developed through extensive stakeholder coordination.
Floodplains	Floodplain permit approved in 2014 for this project.
Water quality	Latest CDPHE 303(d) list reviewed; new CDOT MS4 permit approved in 2014; as previously authorized, project has been designed consistent with prior MS4 permit.
Transportation	Interchange designed based on future traffic per 2035 PPACG Transportation Plan. Project will temporarily close tails, including one that did not exist in 2004, but will also add trail connections and a new pedestrian bridge across Monument Creek.
Cumulative effects	New information reviewed, no change.
<b>RESOURCES WITH NO CHANGE, NO NEW ANALYSIS NEEDED</b>	
Archaeological, Paleontological, Railroads, Utilities, Geologic/Soil Issues, Energy, Land Use, Social Resources, Farmlands (none present.)	
<b>DESIGN-BUILD CONSIDERATIONS</b>	
Due to the design-build contracting approach being used, project final design may result in minor variations to currently foreseen impacts. Impacts beyond those currently foreseen could require further permits or inter-agency consultation.	

**A. New Project Impacts Identified and Addressed**

The new project impacts identified in this reevaluation are trail-related, arising from the facts that:

- **SECTION 6(f)** - one previously informal trail in the project area was upgraded using Land and Water Conservation Fund grant monies; therefore, the previously planned trail modification and replacement has now become a Section 6(f) resource conversion; and
- **SECTION 4(f)** - two existing trails (Pikes Peak Greenway western bank and Bear Creek) and one new trail (Pikes Peak Greenway eastern bank) are within the project area will be affected (known as a “use”) by a temporary closure; although the approved I-25 EA did not interpret temporary trail closures as a Section 4(f) issue, this 2014 EA reevaluation identifies these closures as Section 4(f) temporary occupancy, consistent with the more recent US 24 EA and FONSI, and with FHWA’s revised Section 4(f) Policy Paper (July 20, 2012). FHWA’s approval of Form #1399 will provide concurrence of Section 4(f) *De minimus* impacts to the Pikes Peak Greenway and Bear Creek Trails. These impacts and their current status are summarized in Table 2 below.

**Table 2. Summary of Section 4(f) and Section 6(f) Trail Issues**

Trail	Impact	Section 4(f)	Section 6(f)
Midland (east-, crossing under I-25)	Permanent closure and relocation; detours during construction	<i>Transportation enhancement exception:</i> City of Colorado Springs signed a letter of concurrence on 10/28/2014 and FHWA concurred on 12/2/2014.	City of Colorado Springs letter signed on 5/14/2014 concurred with the conversion. CPW and National Parks Service (NPS) provided conditional concurrence on 9/25/2014. FHWA concurred on 12/2/2014. Toward the end of project construction, CDOT will document to CPW that the conversion of Section 6(f) properties has been performed.
Pikes Peak Greenway (north-south, along I-25) - main trail and spur through America the Beautiful Park	Temporary closure with detours during construction (minor reconstruction in place)	<i>Transportation enhancement exception:</i> City signed letter of concurrence for temporary occupancy on 9/30/2014. FHWA concurrence will occur when Form #1399 is signed.	NA
Bear Creek (east-west, crossing under I-25)	Temporary closure during construction (detour not feasible) (box extension)	<i>Transportation enhancement exception:</i> City signed letter of concurrence for temporary occupancy on 9/30/2014. FHWA concurrence will occur when Form #1399 is signed.	NA

Section 6(f) and Section 4(f) impacts are discussed in more detail in the text which follows.

---

1  
2 **SECTION 6(f) RESOURCES**  
3

4 I-25 EA Findings in 2004 regarding Section 6(f) Resources

5 The I-25 EA identified no Section 6(f) resources that would be affected by the I-25 Proposed Action. At  
6 the time the I-25 EA was prepared, the former Midland Railroad grade crossing under I-25 was being  
7 used informally as an unimproved trail connecting to the Pikes Peak Greenway. America the Beautiful  
8 Park was planned but did not yet exist.  
9

10 The I-25 Proposed Action would widen the highway over the informal rail crossing, reducing its  
11 desirability as a trail crossing. CDOT consulted with the City of Colorado Springs regarding this matter,  
12 and developed the following solution with which the City concurred. The solution included closing the  
13 informal trail under I-25 and replacing it with an improved trail crossing along Fountain Creek, about 850  
14 feet south of the railroad grade.  
15

16 US 24 EA Findings in 2012 regarding Section 6(f) Resources

17 The US 24 EA indicated that the Midland Trail from America the Beautiful Park to 21<sup>st</sup> Street was a  
18 Section 6(f) resource that would be affected with a relocation and replacement from 8th Street to 11<sup>th</sup>  
19 Street and impact due to temporary detours during construction by the US 24 Proposed Action.  
20

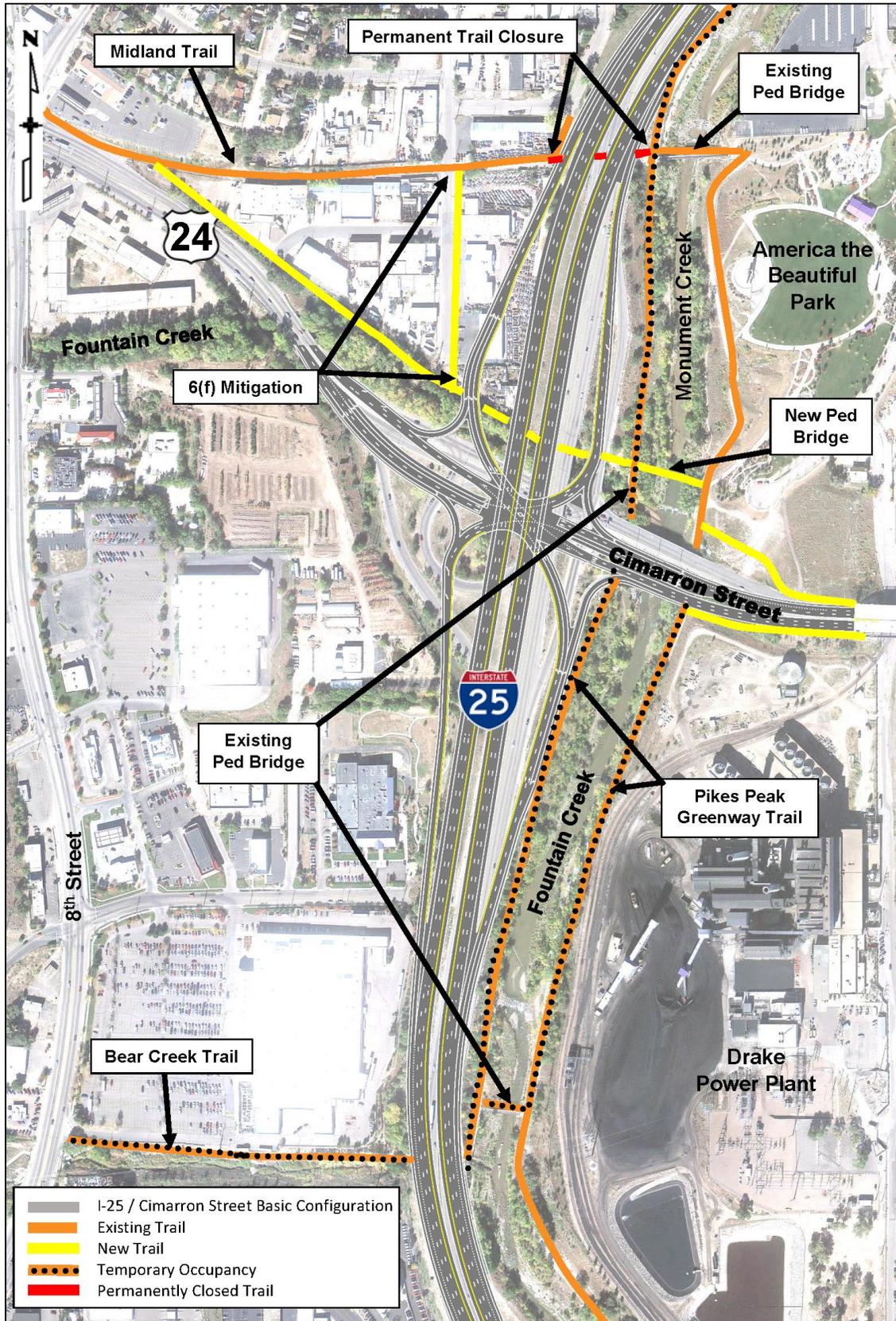
21 New Information regarding Section 6(f) Resources

22 Research undertaken for this reevaluation determined that on  
23 December 18, 2003, Land and Water Conservation Fund (LWCF)  
24 grant ID#1077 in the amount of \$150,000 was awarded to the City  
25 of Colorado Springs for the Midland Trail and Pedestrian Bridge  
26 Project. This project built a pedestrian bridge connecting the  
27 America the Beautiful Park (east of Fountain Creek) to the existing  
28 Pikes Peak Greenway trail (west of Monument Creek), and constructed a paved Tier 1 (multipurpose)  
29 trail westward to 21<sup>st</sup> Street. The City built this trail as an expedient, cost-effective east-west connection  
30 at a time when it was unclear when the CDOT proposed replacement trail would get funded and built.  
31 The existing Midland Trail connection under I-25 has been in use for approximately ten years.  
32

**Attachment 1** provides documentation of impacts and consultation regarding the Midland Trail crossing under I-25, which has become a Section 6(f) resource.

33 The improved, LWCF-funded Midland Trail is now a Section 6(f) resource that did not exist when the I-25  
34 EA was prepared. Accordingly, CDOT undertook Section 6(f) consultation as part of this EA reevaluation.  
35 As required by regulations, CDOT's documentation indicates that there will be a conversion to the  
36 existing trail to a use other than for recreation, and the proposed new trail along Fountain Creek is of  
37 greater value than the Section 6(f) property being replaced. CDOT has consulted with the Colorado  
38 Springs Department of Parks, Recreation and Cultural Resources and with NPS through Colorado Parks  
39 and Wildlife (CPW) regarding the Section 6(f) property replacement, and has received their conditional  
40 concurrence. Figure 4 illustrates the existing crossing that will be closed and the new crossing that will  
41 be constructed.  
42  
43

Figure 4. Impacted Trails and Proposed New Trails in the I-25 Cimarron Interchange Vicinity



1 Mitigation for Section 6(f) Impacts

2 The newly identified Section 6(f) impact will be adequately mitigated by the new Fountain Creek  
3 crossing under I-25, which was included as part of the I-25 EA Proposed Action in 2004 before the  
4 Midland Trail was improved and became a Section 6(f) resource. Colorado Parks and Wildlife has  
5 provided conditional concurrence that the proposed replacement property meets Section 6(f)  
6 requirements. Prior to completing the project, CDOT will provide CPW with the appropriate  
7 documentation showing that all appropriate Section 6(f) substitution property (including the  
8 replacement trail) has been provided. Once construction has commenced, the final design has been  
9 completed, and ROW acquisition has been finalized, CDOT will complete the conversion process by  
10 providing additional information and documentation to CPW and NPS that the conversion of the Section  
11 6(f) resource was performed and the replacement property is deeded to the City of Colorado Springs to  
12 maintain as a Section 6(f) resource in perpetuity.

13  
14 Conclusion for Section 6(f) Resources

15 The I-25 Cimarron interchange project now results in a Section 6(f) conversion of the Midland Trail  
16 crossing under I-25. Required Section 6(f) consultation has been performed and all stakeholders concur  
17 that the Proposed Action provides the needed replacement property.

---

18  
19  
20 **SECTION 4(f) RESOURCES**

21  
22 I-25 EA Findings in 2004 regarding Section 4(f) Resources

23 The I-25 EA identified one use of a Section 4(f) resource in the vicinity of the I-25 Cimarron interchange.  
24 This was the Depression-era Works Progress Administration (WPA) floodwall along Monument Creek  
25 (i.e., east of I-25) between Bijou Street and the Midland Railroad alignment. This impact already  
26 occurred and was mitigated as part of improvements to the Bijou Street  
27 interchange. The EA identified no Section 4(f) impacts that would be  
28 attributable to the I-25 Cimarron interchange project.

**Attachment 2** provides  
documentation of  
consultation regarding  
Section 4(f) temporary  
occupancy of trails.

29  
30 Regarding recreational resources, the I-25 EA indicated that nearby trails  
31 would experience temporary closures and minor realignments. It also  
32 discussed the planned closure and replacement of a temporary, informal  
33 trail (now the improved Midland Trail) under I-25, discussed above as a Section 6(f) impact. These trail  
34 impacts were not identified as Section 4(f) impacts at the time.

35  
36 US 24 EA Findings in 2012 regarding Section 4(f) Resources

37 The US 24 West Corridor EA, which reviewed the I-25 Cimarron interchange area because it falls within  
38 the project study area, identified four Section 4(f) resources in the interchange vicinity. While no use of  
39 these Section 4(f) resources was identified, there will be a temporary occupancy of the Pikes Peak  
40 Greenway during construction of the loop ramp. The identified Section 4(f) resources were:

- 41  
42
- 43 • America the Beautiful Park,
  - 44 • the Midland and Pikes Peak Greenway Trails, and
  - 45 • the Westside Historic District.

46 A portion of the Westside Historic District is located northwest of the I-25 Cimarron interchange project  
47 area. However, the Section 4(f) impact resulted from the taking of two 115-year-old homes at the  
48 western end of the district, not in the vicinity of the I-25 Cimarron interchange.

1 The realignment of the Midland Trail from 8<sup>th</sup> Street west to 11<sup>st</sup> Street was described in the approved  
2 US 24 West Corridor EA as a Section 4(f) use and was included in the full Section 4(f) evaluation.

3  
4 New Information regarding Section 4(f) Resources

5 The Pikes Peak Greenway eastern bank trail was built by the City of Colorado Springs on the eastern  
6 bank of Monument Creek, extending southward to the City of Fountain from America the Beautiful Park  
7 under the Cimarron Street Bridge that crosses the creek. The I-25 Cimarron interchange project will not  
8 take land from this trail, but will result in the trail's temporary closure as the Cimarron Street Bridge  
9 over the trail is demolished and replaced.

10  
11 For clarification, impacts to recreation resources are summarized below and are shown in Figure 4.

- 12 • Pikes Peak Greenway Trail (eastern and western bank) –during interchange reconstruction, this  
13 trail will undergo temporary closure and permanent minor realignment. Potential realignment  
14 was noted in the EA but now is known in more specific detail. Also, an existing north-south trail  
15 bridge that crosses east-west Fountain Creek will be replaced because the Proposed Action will  
16 alter the creek's location and/or width. This was not anticipated in the I-25 EA. For the safety of  
17 its users, this greenway trail will need to be closed temporarily during the demolition and  
18 replacement of the aging, failing Cimarron Street Bridge that crosses over Fountain Creek. This  
19 temporary closure was not specifically identified in the I-25 EA. During this temporary closure of  
20 the trail under the Cimarron Street Bridge, the Pikes Peak Greenway north of Bear Creek Trail to  
21 Cimarron Street will have no connectivity and serve no function.
- 22 • Midland Trail crossing under I-25 – this formal, improved trail crossing (that has replaced the  
23 informal, unimproved trail crossing referenced in the I-25 EA) will be closed and will be replaced  
24 with a new creekside crossing 850 feet to the south. Whereas a City-built trail bridge currently  
25 crosses Monument Creek to connect the Midland Trail into the northern end of America the  
26 Beautiful Park, CDOT will build an additional trail bridge at the southern end of the park so that  
27 there is a direct Midland Trail connection into the park at that location as well. The existing City-  
28 built trail bridge will remain in place, continuing to connect the park to the Pikes Peak Greenway  
29 Trail.
- 30 • Bear Creek Trail crossing under I-25 – as was indicated in the I-25 EA, this trail crossing, within a  
31 box culvert, will undergo temporary closure while CDOT extends the length of the culvert to  
32 accommodate the reconstruction of I-25 over it. During the temporary closure of this I-25  
33 crossing, the segment of Bear Creek Trail from I-25 to South 8<sup>th</sup> Street will temporarily have no  
34 continuity and serve no function.

35  
36 It should be noted that the City of Colorado Springs has committed to building an additional pedestrian  
37 bridge north of the Cimarron Street Bridge to directly connect the relocated Midland Trail to the eastern  
38 bank Pikes Peak Greenway trail and America the Beautiful Park. This will be an enhancement to the 4(f)  
39 resources, Pikes Peak Greenway trail and America the Beautiful Park, and not an impact. None of the  
40 impacts above are inconsistent with the EA's characterization of minor realignments and temporary  
41 closures and detours.

42  
43 As part of this I-25 EA reevaluation, a qualified historian re-examined the I-25 Cimarron project area to  
44 determine whether or not any nearby properties or other resources had now reached the fifty-year  
45 threshold at which evaluation for eligibility as historic resources is normally considered. Please see the  
46 Historic Resources discussion later in this reevaluation for more detail about the extensive research that  
47 was conducted. That detail is not provided here because CDOT found that there is no Section 4(f) use of  
48 historic properties by the I-25 Cimarron interchange project.

1 Mitigation for Section 4(f) Use

2 Impacts and mitigation as described in the 2004 I-25 EA remain valid for this portion of the I-25 corridor.  
3 Detours have been identified for all temporary trail closures with east/west travel across I-25 being  
4 provided by accessing Colorado Avenue. The Bear Creek detour will also include travel on 8th Street to  
5 access Colorado Avenue.  
6

7 Conclusion for Section 4(f) Resources

8 Impacts to recreational resources were examined for the I-25 corridor in the I-25 EA that was approved  
9 in 2004. Subsequently the 2012 US 24 EA included recreational resource evaluation for the 4-mile US 24  
10 Proposed Action that includes the I-25 Cimarron interchange. In 2014, CDOT consulted with the City of  
11 Colorado Springs, which has concurred with the relocation of the Midland Trail and the temporary  
12 closure (occupancy) of the Pikes Peak Greenway and Bear Creek trails during construction.  
13  
14

15 **B. Resources with Updated Analytical Tools, New Regulations, or New Data**  
16 **Considered**

17  
18 Discussed below are 14 resources for which there are now new applicable analytical tools, regulations or  
19 data. This information has been developed for the purpose of due diligence.  
20

- 21 • Air Quality
  - 22 • Traffic Noise
  - 23 • Vegetation and Noxious Weeds
  - 24 • Threatened and Endangered Species
  - 25 • Fish and Wildlife
  - 26 • Wetlands and Waters of the U.S.
  - 27 • Floodplains
  - 28 • Water Quality
  - 29 • Hazardous Materials
  - 30 • Right of Way
  - 31 • Economic Resources
  - 32 • Environmental Justice
  - 33 • Historic Resources
  - 34 • Visual Resources
  - 35 • Transportation Resources
  - 36 • Cumulative Effects
- 37

38 These topics are summarized below in the order that they are listed above. Each discussion provides  
39 information/the findings from the approved I-25 EA, the US 24 EA, what new information is now  
40 available, and conclusions regarding impacts and mitigation.  
41

---

42  
43 **AIR QUALITY**

44  
45 I-25 EA Findings in 2004 regarding Air Quality

46 Ten years ago, the I-25 EA included extensive modeling of future carbon monoxide (CO) concentrations  
47 at many signalized intersections, including the I-25 Cimarron interchange. The modeling extended out to  
48 the 2025 horizon year, and found that the project met all transportation conformity requirements.  
49

1 US 24 EA Findings in 2012 regarding Air Quality

2 Two years ago, the US 24 West Corridor EA also included a comprehensive air quality analysis and  
3 concluded that all transportation conformity requirements would be met through the year 2035. The CO  
4 hotspot modeling for this EA also specifically included the I-25 Cimarron interchange, and also assumed  
5 completion of future phases of the I-25 Proposed Action as reflected in the current 2035 Regional  
6 Transportation Plan. The analysis addressed other criteria pollutants and Mobile Source Air Toxics as  
7 well.

8  
9 Model predictions in the I-25 EA indicated an intersection contribution of more than 4 ppm and a  
10 background contribution of about 4 ppm, for total of 8.83 ppm, meeting the 9.0 ppm national standard.  
11 The US 24 EA predicted a 20-year increase of about 3.5 ppm from the new, lower base condition of 2  
12 ppm, for totals just over 5.5 ppm. Since then, base condition (highest monitored) concentrations in the  
13 project vicinity have continued to decline.

14  
15 New Information regarding Air Quality

16 A new air quality emission factor model called MOVES2014 is now applicable for transportation impact  
17 analysis. MOVES 2014 was issued by EPA in July 2014, so it was not available at the time that the US 24  
18 West Corridor EA was prepared. Given the existence of an air quality analysis approved two years ago by  
19 CDOT and FHWA using transportation modeling assumptions that remain current today, there appears  
20 to be little reason to re-analyze the same interchange with the new MOVES2014 emission factor  
21 program. MOVES2014 is more data-intensive than MOBILE 6.2, but would not be expected to produce a  
22 higher prediction for future CO emissions.

23  
24 Rather than conduct a new CO hotspot analysis using MOVES2014 for an interchange that has already  
25 undergone FHWA-approved air quality analysis twice before, CDOT hereby incorporates by reference  
26 the Air Quality Technical Memorandum for the US 24 EA. This replaces the decade-old I-25 EA air quality  
27 analysis (using a previously proposed interchange configuration) with a recent, FHWA-approved air  
28 quality analysis for the same location with its current proposed interchange configuration. The FONSI for  
29 the US 24 West project was approved in October 2014.

30  
31 Mitigation for Impacts to Air Quality

32 Air quality mitigation in the I-25 EA addressed control of fugitive dust from construction activity, and this  
33 remains valid for the I-25 Cimarron interchange project. No new, additional mitigation is needed.

34  
35 Conclusion for Air Quality

36 New analysis is not warranted because the FHWA-approved US 24 West air quality analysis is  
37 sufficiently current and showed that all requirements would be met easily through the current planning  
38 horizon year (2035) for the current interchange configuration. Now, as when the US 24 EA was  
39 approved, the I-25 Cimarron interchange is included in the approved, conforming PPACG Regional  
40 Transportation Plan and 5-year Transportation Improvement Program. It fully meets all transportation  
41 conformity requirements.

42  
43  
44 **TRAFFIC NOISE**

45  
46 I-25 EA Findings in 2004 regarding Traffic Noise

47 The I-25 EA indicated that noise impacts (66 or more A-weighted decibels) would occur in the western  
48 portion of America the Beautiful Park, planned concurrently with the I-25 Proposed Action. The 2004  
49 I-25 EA included a letter from the City of Colorado Springs indicating that visibility to and from the

1 planned park would be more important than reducing traffic noise. Therefore, the City did not want a  
2 wall or berm to protect the planned park from traffic noise.

3  
4 The I-25 EA also indicated the Pikes Peak Humane Society commercial property, adjacent to the  
5 interchange’s southbound on-ramp, is located within the predicted 71-decibel contour. However,  
6 Section 6.3 (“Mitigation Measures Analyzed for Category C Receptors”) of the I-25 EA Noise Technical  
7 Report concluded that this was a commercial property and therefore mitigation was not considered for  
8 this receptor.

9  
10 Several trails closely paralleling or crossing I-25 also would experience traffic noise exceeding 66  
11 decibels, but mitigation was determined to be not reasonable and feasible.

12  
13 No noise abatement was recommended in the interchange vicinity. Hundreds of comments were  
14 received from the public in the 2004 EA public review process, including many comments about traffic  
15 noise elsewhere along the corridor, but none were received regarding noise in the Cimarron interchange  
16 area.

17  
18 US 24 EA Findings in 2004 regarding Traffic Noise

19 The 2014 US 24 West Corridor EA analyzed noise for receptors in only the northwestern quadrant of the  
20 Cimarron interchange. Figure 5-2 in the US 24 EA Noise Technical Memorandum identified two  
21 “impacted” receptors, both being industrial land properties which will be purchased for CDOT right-of-  
22 way. This noise analysis did not address traffic noise on trails. No noise mitigation was recommended in  
23 the vicinity of the I-25 Cimarron interchange.

24  
25 New Information regarding Traffic Noise

26 Pursuant to Federal requirements, CDOT adopted revised Noise Analysis  
27 and Abatement Guidelines in 2013. Noise analyses for Federal highway  
28 projects are required to use a new noise modeling software called TNM  
29 that had not yet been developed when the I-25 EA was prepared. That EA  
30 used the STAMINA noise modeling software instead.

**Attachment 3**  
provides  
documentation of 2014  
updated noise analysis  
and abatement results.

31  
32 In accordance with the latest requirements, a new noise impact analysis was completed in 2014 for the  
33 I-25 Cimarron project using the TNM 2.5 traffic noise modeling software. The model was created to  
34 update traffic noise levels for the current planning horizon of 2035 using noisiest hour maximum traffic  
35 volumes from Table 4 of the CDOT 2013 Noise Analysis and Abatement Guidelines. Predicted future  
36 noise levels ranged from 62 dBA to 74 dBA. When considering possible noise abatement, 66 dB(A) is the  
37 threshold applicable for parks and residences, while outdoor noise-sensitive businesses uses have a 71  
38 dB(A) threshold.

39  
40 Concerns about traffic noise were raised in 2014 by representatives of the Humane Society of the Pikes  
41 Peak Region, whose regional pet shelter is adjacent to the southbound I-25 on-ramp. The I-25 EA in 2004  
42 had indicated that this property was “within the 71 dB(A) contour,” meaning that the noise level was  
43 predicted to be greater than 71 dB(A), but did not model this property as a receptor to obtain a more  
44 specific prediction. The new modeling results show a prediction of 74 dB(A) at the shelter’s main  
45 entrance and results of 71 dB(A) at the right-of-way line, 69 dB(A) 100 feet inside the property and 67  
46 dB(A) at 200 feet inside the property. These data confirm that outdoor areas adjacent to I-25 are  
47 impacted by traffic noise. However, because this receptor was not evaluated for abatement in the I-25  
48 EA, no objections or comments were received during public comments reported in the I-25 EA/FONSI,

1 and the FONSI date of public knowledge has passed, no further mitigation analysis for this site was  
2 required or pursued in this reevaluation.

3  
4 The 2014 noise analysis included the modeling of noise receptors at two active use locations within  
5 America the Beautiful Park, and predicted future noise levels of 62 dB(A), which does not meet the 66  
6 dB(A) Noise Abatement Criterion for this type of land use. Prior to this modeling effort, CDOT  
7 coordinated again with the City of Colorado Springs in 2014 regarding noise impacts to America the  
8 Beautiful Park. The City provided a new letter reaffirming its prior position that noise mitigation is not  
9 desired for this receptor. An important cultural aspect of this park is its association with Pikes Peak (the  
10 “purple mountain majesty” in the well-known America the Beautiful song), so park officials did not want  
11 noise barriers to diminish views of Pikes Peak.

12  
13 No new modeling of nearby trails was conducted in 2014. Based on the other findings in 2014, it can be  
14 safely assumed that they would have the same general magnitude of noise levels as was predicted  
15 previously, and that noise abatement would again not be recommended consistent with the 2004 EA.

#### 16 17 Mitigation for Traffic Noise Impacts

18 No change to I-25 EA mitigation was required. The only noise barrier recommended in the I-25 EA  
19 mitigation was at America the Beautiful Park. The City confirmed that no noise barrier is desired;  
20 therefore, no noise abatement is recommended (see letter from City in Attachment #3). The 2004 EA  
21 stated that: “To the extent feasible, construction noise impacts, while temporary, will be mitigated by  
22 limiting work to daylight hours and requiring the contractor to use well-maintained equipment  
23 (particularly with respect to mufflers).”

#### 24 25 Conclusion for Traffic Noise

26 Based on the updated noise analysis using the TNM 2.5 noise modeling software and noisiest hour  
27 traffic projections, CDOT concludes that TMN predicted noise impacts for 2035 are similar to noise level  
28 contour predictions generated in the I-25 EA.

---

## 30 31 **VEGETATION AND NOXIOUS WEEDS**

### 32 I-25 EA Findings in 2004 regarding Vegetation and Noxious Weeds

33 The I-25 EA found 15 species of noxious weeds along the 26-mile corridor, but did not indicate their  
34 specific locations.

### 35 36 US 24 EA Findings in 2012 regarding Vegetation and Noxious Weeds

37 Appendix C of the US 24 EA contains detailed notes regarding where six noxious weed species were  
38 found in the I-25 Cimarron interchange vicinity.

### 39 40 New Information regarding Vegetation and Noxious Weeds

41 Field visits to the project site in 2014 found infestations of two invasive species that are not on the  
42 formal noxious weed lists, Siberian elm (*Ulmus pumila*) and crack willow (*Salix fragilis*). Both of these are  
43 recognized by the U.S. Forest Service as invasive species (e.g., see USFS Weed of the Week profiles for  
44 April 14, 2005 and February 27, 2006). CDOT’s Noxious Weed mapping database in 2013 also identified  
45 the location of the two noxious weed species, Common burdock (*Arctium minu*) and Russian olive (*Elaegnus*  
46 *angustifolia*) in the I-25 Cimarron interchange vicinity. As part of project mitigation, a new noxious weeds  
47 survey providing updated information would be performed prior to construction.

1 An I-25 Cimarron Interchange Aesthetics committee was developed to provide CDOT and the contractor  
2 with guidance on project features such as landscaping, lighting, and wall design. The committee also  
3 provided input regarding which native trees should be used on the project and which non-native trees  
4 should be removed.

#### 5 6 Mitigation for Vegetation and Noxious Weed Impacts

7 The mitigation commitments in the two approved EAs said essentially the same thing regarding noxious  
8 weeds, but in different words. For improved clarity and ease of tracking, the mitigation proposed for the  
9 interchange project has been updated in the mitigation tracking matrix and restated as follows:

- 10  
11
- 12 • Prior to construction, CDOT’s contractor will conduct a noxious weeds survey of the project area.
  - 13 • Prior to construction, CDOT’s contractor will develop an Integrated Noxious Weed Management  
14 Plan that includes Best Management Practices designed to control all noxious weed species  
15 identified in the survey, with special emphasis on control of Chinese clematis, Siberian elm, and  
16 crack willow. Given the project location near the confluence of the region’s two main waterways,  
17 This plan must require that any herbicides used be safe for application near riparian areas.
  - 18 • During construction, CDOT’s contractor will implement the project’s Integrated Noxious Weed  
19 Management Plan. As part of this effort, CDOT or its contractor will promptly revegetate disturbed  
20 soils with appropriate native species.
  - 21 • Contractor will follow SB 40 guidelines.
  - 22 • After construction, CDOT’s contractor will monitor, maintain and, if necessary, re-treat the disturbed  
23 areas to ensure that revegetation has been successful, such that it can reasonably be expected to  
24 resist noxious weed infestation.
- 25

#### 26 Conclusion for Vegetation and Noxious Weed Impacts

27 Project impacts remain unchanged from the 2004 I-25 EA, although the list of noxious weeds occurring  
28 in the interchange vicinity has been updated and more site-specific surveys have been made.

29

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### 31 **THREATENED AND ENDANGERED SPECIES**

#### 32 I-25 EA Findings in 2004 regarding Threatened and Endangered Species

33 The I-25 EA identified no impacts to T&E species in the vicinity of the I-25 Cimarron interchange.

35

#### 36 US 24 West Corridor EA Findings in 2012 regarding Threatened and Endangered Species

37 The US 24 West Corridor EA stated (page 3-81) that: “Federal- or state-listed threatened or endangered  
38 species and state species of special concern are either not present or are unlikely to occur in the project  
39 area. “ Accordingly, it concluded on page ES-24 that no mitigation was necessary. Regarding aquatic  
40 species, the US 24 West Corridor EA indicated that the Fountain Creek watershed includes the  
41 greenback cutthroat trout (federal and state threatened), the Arkansas darter (federal candidate and  
42 state threatened) and the flathead chub (a state species of special concern). Within the study area, only  
43 brown trout and brook trout were found.

44

#### 45 New Information regarding Threatened and Endangered Species

46 The May 2014 U.S. Fish and Wildlife Service list of federal candidate, threatened and endangered  
47 species in El Paso County is provided in Table 3. None of these species occurs in the project area.

48  
49  
50

1 **Table 3. Federal Candidate, Threatened, and Endangered Species in El Paso County, as of May 2014**

Common Name	Species Scientific Name	Status	Occurs in Project Area?
Mexican Spotted Owl	<i>Strix occidentalis lucida</i>	Threatened	No
Greenback cutthroat trout	<i>Oncorhynchus clarki spp. Stomia</i>	Threatened	No
Pawnee montane skipper	<i>Hesperia leonardus diluvialis</i>	Threatened	No
Ute ladies'-tresses orchid	<i>Spiranthes diluvialis</i>	Threatened	No
Preble's meadow jumping mouse	<i>Zapus hudsonius preblei</i>	Threatened	No
Arkansas darter	<i>Etheostoma cragini</i>	Candidate	No

2  
3 CDOT coordinated with CPW staff for this I-25 EA reevaluation. CPW indicated its preference that any  
4 stream modifications (e.g., drop structures) to Fountain Creek should accommodate fish movement  
5 specifically the flathead chub. Regarding Bear Creek, which flows into Fountain Creek at the southern  
6 end of the project area, CPW did not want to encourage fish movement from Fountain Creek to Bear  
7 Creek in order to protect Greenback Cutthroat trout populations upstream from whirling disease, which  
8 is found in Fountain Creek trout.

9  
10 Conclusion for Threatened and Endangered Species

11 The FHWA-approved findings in 2012 for the US 24 West Corridor EA remain valid, and are incorporated  
12 here by reference. Reconstruction of the I-25 Cimarron interchange would have no impacts on  
13 threatened or endangered species.

14  
15 Mitigation for Effects to Threatened and Endangered Species

16 Based on coordination with CPW in 2014, the following new commitment is being made for this project:

- 17 • Per CPW request, any CDOT modifications to Fountain Creek will enhance fish mobility while  
18 modifications to Bear Creek will not improve fish movement between Bear Creek and Fountain  
19 Creek in order to protect upstream populations of Greenback Cutthroat trout. More details on  
20 drop structure requirements are included in the I-25 Cimarron Interchange planting plans.
- 21 • CDOT and the contractor will coordinate with CPW regarding the design for drop structures and  
22 any other rock work/channel work in the creek. CDOT's contractor will be required to submit  
23 the design to CDOT (Region and Headquarters staff) and CPW for review and approval of SB 40  
24 permit prior to constructing these features.

25  
26  
27 **FISH AND WILDLIFE**

28  
29 I-25 EA Findings in 2004 regarding Fish and Wildlife

30 The I-25 EA examined the 26-mile I-25 corridor and documented a large number of animals in the  
31 region, including 16 species of mammals, 29 birds, 7 amphibians, 13 reptiles and 11 fish species known  
32 to occur in Monument and/or Fountain Creek. The I-25 Cimarron interchange is located immediately  
33 adjacent to the confluence of south-flowing Monument Creek and east-flowing Fountain Creek. These  
34 creeks provide habitat, though limited, for various fish and bird species, as well as terrestrial wildlife.

35  
36 US 24 EA Findings in 2012 regarding Fish and Wildlife

37 Compared to the I-25 EA, the US 24 EA contained a smaller list of species found along its 4-mile corridor.  
38 Numerous bird species were observed in the project area. A 2006 survey observed only one raptor, no  
39 bald eagles, and no raptor nests. The US 24 West Corridor EA did not identify any key wildlife impacts or  
40 mitigation commitments that differ from the I-25 EA.

1 New Information regarding Wildlife

2 CDOT coordinated with CPW staff for this EA reevaluation. These efforts included a joint site visit  
3 conducted on May 13, 2014. CPW had concerns about fish movement, as noted in the discussion of  
4 threatened and endangered species, above. CPW expressed no other wildlife concerns with the I-25  
5 Cimarron interchange project.

6  
7 Mitigation for Effects to Fish and Wildlife

8 The I-25 EA contained two mitigation commitments applicable to the I-25 Cimarron interchange vicinity:  
9 (1) CDOT will design hydraulic structures to improve corridor east/west movement, and will revegetate  
10 disturbed areas to replicate or enhance habitats; and (2) CDOT will conduct field surveys for migratory  
11 birds that are protected by the Migratory Bird Treaty Act before removing large trees. Obtain necessary  
12 permits if required.

13  
14 Additionally, the following commitment is being added at this time, in accordance with CDOT standard  
15 practices:

- 16 • CDOT specification 240 will be followed to minimize impacts to nesting birds.

17  
18 Conclusion for Fish and Wildlife

19 Impacts described in the 2004 I-25 EA remain valid for this portion of the I-25 corridor.  
20

---

21  
22 **WETLANDS/WATER OF THE UNITED STATES**

23  
24 I-25 EA Findings in 2004 regarding Wetlands and Waters of the United States

25 Wetland delineation done for the I-25 EA indicated minimal presence of wetlands in the interchange  
26 vicinity and therefore minimal impacts to wetlands and waters of the United States in project area.  
27

28 US 24 EA Findings in 2012 regarding Wetlands and Waters of the United States

29 Wetland delineation done for the US 24 EA indicated minimal impacts to  
30 wetlands and waters of the United States in project area.

31  
32 New Information regarding Wetlands and Waters of the United States

33 Wetland delineation procedures have changed since the I-25 EA was  
34 prepared. The U.S. Army Corps of Engineers has issued regional  
35 supplements for its nationwide wetland delineation manual and CDOT  
36 has updated its Functional Assessment of Colorado Wetlands (FACWet)  
37 methodology. These tools would be applicable to this 2014 reevaluation  
38 if wetlands currently existed in the project area, but as noted below, they do not.

CDOT has received a  
Section 404 Permit for  
the I-25 Cimarron  
interchange project. A  
copy of the permit is  
provided in  
**Attachment 4.**

39  
40 Representatives of CDOT, CPW and the U.S. Army Corps of Engineers conducted a joint field inspection  
41 of the I-25 interchange project area on May 13, 2014. As the result of that multi-agency inspection, it  
42 was determined that there are **currently no wetlands present** within the project work area. The current  
43 lack of wetlands is not a result of new criteria or definitions, but instead due to changes in the physical  
44 environment e.g. incising, camping activity. Creation of a high flow channel with a sinuous low flow  
45 channel occurred on Fountain Creek upstream (west) of the I-25 Cimarron interchange over the past  
46 decade.

47  
48 CDOT has obtained a Section 404 permit for the I-25 Cimarron project including ARE No. 3 (Stream  
49 improvements west to 8<sup>th</sup> Street) from USACE because Monument and Fountain creeks are waters of

1 the United States. The Proposed Action has been approved in accordance with Nationwide Permit #14  
2 (linear Transportation Projects) and Regional General Permit #37 (Stream Stabilization).

3  
4 Conclusion for Wetlands and Waters of the United States

5 The wetland impacts anticipated for the Cimarron interchange in the 2004 EA have now become zero  
6 impact. There are currently no wetlands present within the project area.

7  
8 Mitigation for Impacts to Wetlands and Waters of the United States

9 No wetland impact mitigation is needed for the I-25 Cimarron interchange project.  
10

---

11  
12 **FLOODPLAINS**

13  
14 I-25 EA Findings in 2004 regarding Floodplains

15 The I-25 Cimarron interchange is located at the confluence of two major drainages, Monument Creek  
16 and Fountain Creek, therefore much of the project area is located within the 100-year floodplain. This is  
17 illustrated in Figure 5, excerpted from the I-25 EA Floodplain Technical Memorandum (2004 EA).

18  
19 US 24 EA Findings in 2012 regarding Floodplains

20 The US 24 EA reexamined the proposed I-25 Cimarron interchange and noted that the I-25 Cimarron  
21 interchange would accommodate the 100-year storm event and no portion of the roadway would be  
22 overtopped. The EA stated that CDOT would provide a stabilized low-flow channel in Fountain Creek and  
23 a widened, stabilized area to accommodate the 100-year storm event. The EA added that CDOT would  
24 coordinate these efforts with the Federal Emergency Management Agency (FEMA) and would prepare a  
25 Conditional Letter of Map Revision (CLOMR) in conjunction with these improvements if required.

26  
27 New Information regarding Floodplains

28 The U.S. Army Corps of Engineers has completed a study of Fountain Creek and has reduced the 100-  
29 year flows. FEMA is in the process of developing new FIRM maps but they  
30 are not yet complete at this time. In 2014, CDOT received a floodplain  
31 development permit for the I-25 Cimarron interchange project with the  
32 SPDI configuration.

CDOT has received a  
Floodplain  
Development Permit  
for the I-25 Cimarron  
interchange project. A  
copy of the permit is  
provided in  
**Attachment 5.**

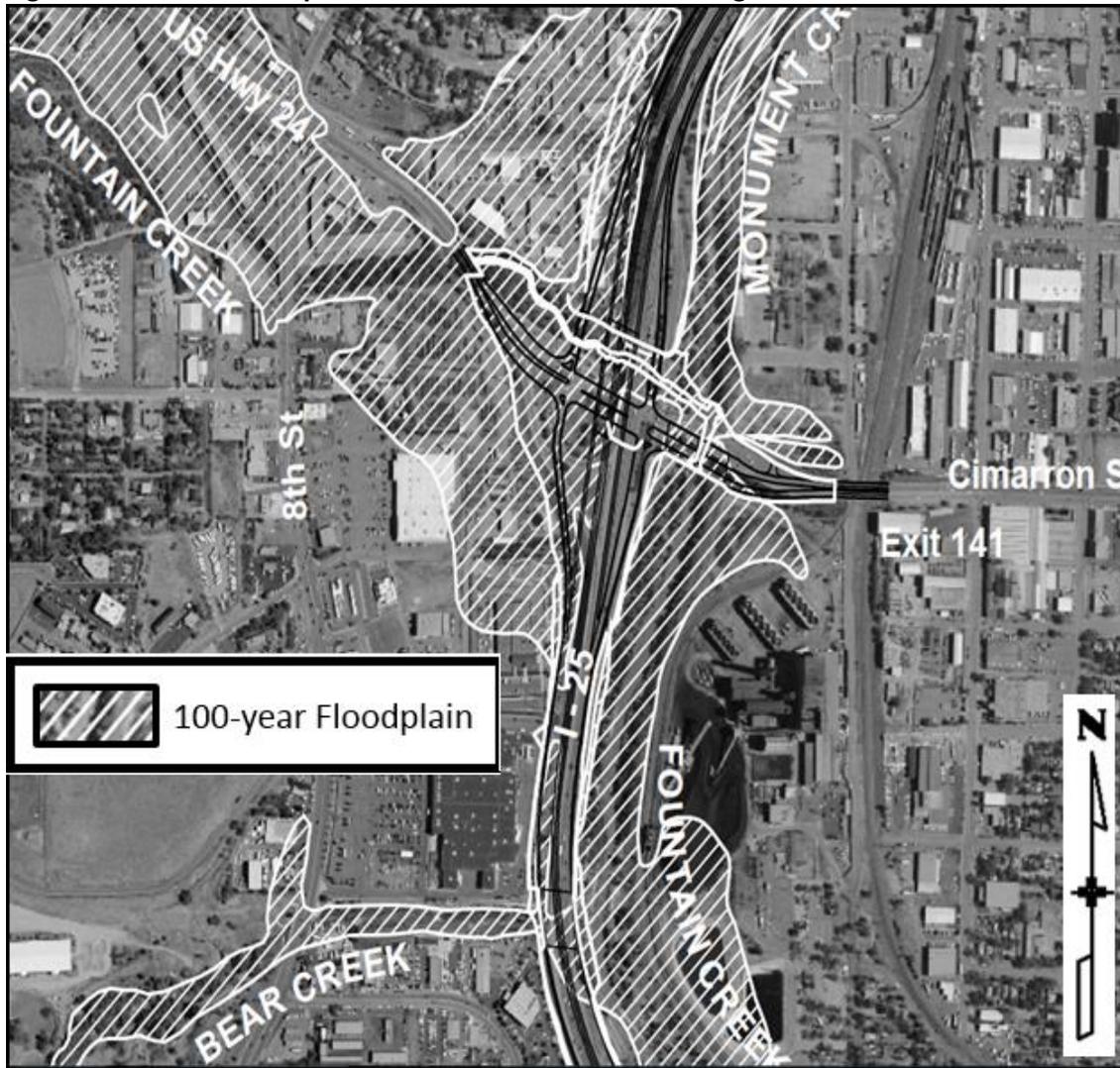
33  
34 Mitigation for Floodplain Impacts

35 The floodplain impact mitigation in the 2004 I-25 EA remains valid. No new  
36 or additional mitigation is needed.

37  
38 Conclusion for Floodplain Impacts

39 The Cimarron interchange project will be constructed to not only meet I-25 needs but also  
40 accommodate the planned US 24 West Corridor Proposed Action. The project fully meets all floodplain  
41 regulations and requirements and has already received a permit for construction.

1 **Figure 5. 100-Year Floodplain at the I-25 Cimarron Interchange**



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## WATER QUALITY

### I-25 EA Findings in 2004 regarding Water Quality

The I-25 EA examined water quality for a 26-mile corridor and did not offer specific focus on the I-25 Cimarron interchange area. It reported that Monument Creek and the Fountain Creek segments in the project area were not included on Colorado’s Clean Water Act Section 303(d) list of Impaired Waters as of 2002. It stated that the I-25 Proposed Action would increase total impervious surface but that the implementation of Best Management Practices could be expected to result in reduced pollution from stormwater runoff.

### US 24 West Corridor EA Findings in 2012 regarding Water Quality

The US 24 EA reported that Fountain Creek in the study area is included in the State of Colorado’s 2008 Section 303(d) list for water quality-impaired streams due to levels of selenium and *E. coli* bacteria that exceed State standards. The selenium leaches naturally from existing shale and shale-derived soils; the *E. coli* has been attributed largely to birds, especially pigeons in Manitou Springs, according to DNA

1 analysis conducted by the United States Geological Survey. Fountain Creek is listed as impaired for *E. coli*  
2 (high priority) and selenium (low priority), but these were not analyzed in this study because they are  
3 not vehicle-related pollutants.

#### 4 New Information regarding Water Quality

5 The 2012 CDPHE 303(d) list identified the same Fountain Creek impairment issues as the 2008 list noted  
6 in the US 24 West Corridor EA. Fountain and Monument creeks remain unimpaired by vehicle-related  
7 pollutants.  
8

9  
10 CDOT's water quality program is dictated to a large degree by the terms of its Municipal Separate  
11 Stormwater Storm Sewer System (MS4) Permit granted by the Colorado Department of Public Health  
12 and Environment (CDPHE) under authority delegated by the U.S. Environmental Protection Agency.  
13 CDOT's MS4 permit number COS-000005 was in place when the 2004 I-25 EA was approved, but expired  
14 effective December 31, 2011. CDOT worked with CDPHE for several years to develop a new MS4 permit  
15 that was approved in 2014. As the planning of the I-25 Cimarron interchange project occurred during the  
16 time while the new permit was being developed, the two agencies agreed that the project would be  
17 subject to the previous permit requirements.  
18

19 The I-25 EA indicated that implementing its Proposed Action would increase the amount of paved  
20 surface over the 26 mile corridor from 235 acres to a total of 363 acres, an increase of 128 acres of  
21 impervious surface. Impervious surfaces do not allow precipitation to soak into the soil to replenish  
22 groundwater, but instead send that moisture to nearby drainages in the form of stormwater runoff.  
23 Substantial portions of the first two phases of the I-25 Proposed Action have now been constructed,  
24 with the notable exception of the I-25 interchanges at Fillmore Street and Cimarron Street. The third  
25 phase of the project (adding HOV lanes, and widening to six lanes south to South Academy Boulevard)  
26 have not yet warranted by existing traffic demand. From the diagram presented earlier in Figure 2, it  
27 can be seen that there is minimal difference in the overall amount of paved surface expected from  
28 changing the I-25 Cimarron interchange design from a TUDI to a SPDI.  
29

30 Three water quality benefits from the I-25 Cimarron interchange project include:

- 31 • removing homeless camps and pollution derived thereof,
- 32 • removing automotive facilities to the NW quadrant which could have had surface runoff into the  
33 creeks, and
- 34 • provision of permanent stormwater quality features which were previously nonexistent in the  
35 area.  
36

37 The existence of homeless camps along Fountain and Monument creeks in the project area is a  
38 phenomenon that was not addressed in the I-25 EA, but which has increased in the intervening years. A  
39 City of Colorado Springs ban on such camping has been partially effective, but the I-25 Cimarron  
40 construction project will provide an opportunity for a more comprehensive response to the problem.  
41

42 CDOT's acquisition of several industrial parcels previously serving automotive-related needs will convert  
43 some land back from impervious surface to pervious landscaped area. Over time, increased absorption  
44 of moisture into the ground may help mitigate contaminated groundwater through dilution, but  
45 meanwhile, it will reduce stormwater runoff in an area very close to the confluence of the region's two  
46 major waterways.  
47

48 Provision of stormwater quality features pursuant to CDOT's MS4 permit may improve water quality  
49 because the features provided to capture runoff from new impervious surface area will also capture

1 runoff from existing lanes that were constructed prior to promulgation of modern stormwater  
2 management requirements.

3  
4 Mitigation for Water Quality Impacts

5 There is no change to previously identified water quality mitigation commitments from the I-25 EA.

6  
7 Conclusion for Water Quality

8 The I-25 EA and US 24 EA both found no unique water quality impacts from the Proposed Action  
9 affecting either Fountain Creek or Monument Creek. The project has been designed to date and the  
10 design-build process will continue to include all necessary and appropriate water quality BMPs to ensure  
11 MS4 permit compliance.  
12

---

13  
14 **HAZARDOUS MATERIALS**

15  
16 I-25 EA Findings in 2004 regarding Hazardous Materials

17 The I-25 EA included preparation of a Modified Phase I Environmental Site Assessment for the I-25  
18 corridor. The I-25 EA reported (page 3-154) that there was an inactive leaking underground storage tank  
19 at 221 S. Chestnut Street, a property CDOT planned to acquire for the southbound I-25 off-ramp to  
20 Cimarron Street.

21  
22 US 24 West Corridor EA Findings in 2012 regarding Hazardous Materials

23 The US 24 EA identified two Recognized Environmental Conditions (RECs) in the vicinity of the I-25  
24 Cimarron interchange. These were a voluntary cleanup site at the Pikes Peak Humane Society property  
25 (633 South 8<sup>th</sup> Street), and an historical landfill at the Martin Drake Power Plant, 700 South Conejos  
26 Street). The voluntary cleanup site addresses a plume of underground water contaminated by past dry  
27 cleaning operations that originated offsite and up gradient from the  
28 Humane Society property. CDOT will acquire a portion of the Humane  
29 Society property for the planned southbound Cimarron on-ramp to I-25.  
30

31 New Information regarding Hazardous Materials

32 The Colorado Department of Public Health was contacted as part of this  
33 process to verify the status of the Pikes Peak Humane Society voluntary  
34 clean-up. The Colorado Department of Public Health issued a Letter of No  
35 Further Action Required for this site in 2002 based on the intended use.  
36 CDOT purchased 215, 221, and 213 South Chestnut Street in May 2013.  
37 Phase II soil borings were conducting in 2014 and revealed petroleum  
38 contamination in several locations on the properties. This information is  
39 being provided to the potential contractors and will be addressed as part  
40 of the construction project.  
41

CDOT has prepared a  
Phase 1 and 2  
Environmental Site  
Assessment (ESA) for  
hazardous material  
sites in the  
northwestern quadrant  
of the I-25 Cimarron  
interchange. A copy of  
these ESAs are  
provided in  
**Attachment 6.**

42 A Phase II Environmental Site Assessment (ESA) was completed in April 2014, examining properties in  
43 the northwestern quadrant of the I-25 Cimarron interchange. These properties recently housed  
44 automobile-related businesses including sales of automobiles and auto parts, collision repair, painting,  
45 racing car modifications, and auto salvage. No new REC sites were identified. Fuel-related (gasoline and  
46 Diesel range organics) as well as naturally-occurring selenium and arsenic soil and groundwater  
47 contamination was discovered on these properties. The fuel-related contamination appears to have  
48 been generated on-site, not upgradient, and appears to be due to past activity.  
49

1 In July of 2014, CDOT has inspected and tested all bridges and structures within the project limits for  
2 asbestos and lead-based paint. No asbestos or lead-based paint was found.

3  
4 The Express Inn property adjacent to the interchange was acquired by CDOT in 2011. The buildings had  
5 extensive asbestos and universal waste abatement in 2013. Building demolition was undertaken in  
6 December 2014.

#### 7 Mitigation for Hazardous Materials Impacts

8 The I-25 EA had indicated that site investigations would be undertaken and that material management  
9 plans would be developed and implemented if the results of the site investigations determined they  
10 were necessary and appropriate. Now, based on the Phase II ESA results, this is known to be the case.  
11 The 2014 ESA specifically recommended development of a Materials Management Plan for the  
12 northwestern quadrant if the I-25 Cimarron interchange.  
13

- 14  
15 • As recommended in the ESA, CDOT will require development of an MMP that specifies, at a  
16 minimum, waste sampling methods, excavation and stockpile management, contaminated soil  
17 treatment/disposal options, and contaminated wastewater treatment/disposal options to be  
18 undertaken in accordance with CDOT Standard HSO Specification - Environmental, Health and  
19 Safety Management.  
20

21 Based on the results of the ESA, the following additional commitments appear to be prudent for the I-25  
22 Cimarron interchange project:  
23

- 24 • During all excavation in areas identified in the MMP has having the potential for encountering  
25 hazardous material, a health monitor will be required.
- 26 • Minimization of dewatering to nearby streams is recommended to reduce fish exposure to high  
27 selenium concentrations. When dewatering is necessary, CDOT Standard Specification 250 will  
28 be followed.
- 29 • Inspections and testing for asbestos, lead-based paint, and hazardous material will be confirmed  
30 on any bridges, buildings, and other structures that will be disturbed or demolished. Prior to  
31 acquisition of any site, a site-specific Initial Site Assessment Phase I ESA will be conducted.  
32

33 The US 24 EA contained a mitigation commitment generally applicable to construction projects involving  
34 right-of-way acquisition. While inspection for asbestos and lead-based paint may be assumed to be part  
35 of the commitments already made in the I-25 EA in accordance with CDOT specification 250,  
36 nevertheless providing additional specificity may be prudent.  
37

#### 38 Conclusion for Hazardous Materials

39 Updated hazardous material investigations have occurred. The fuel-related contamination found in the  
40 interchange's northwestern quadrant was acknowledged as a concern in the 2004 I-25 EA, based on the  
41 auto-related industrial activities then active at the site. This contamination appears to be isolated at  
42 each individual oil/water separator and has not created a pool or plume.  
43

---

## 44 **RIGHT-OF-WAY**

### 45 I-25 EA Findings in 2004 regarding Right-of-Way

46  
47 According to the I-25 EA, estimated right-of-way (ROW) acquisitions along the 26-mile corridor totaled  
48 about 45 acres, concentrated at interchange complexes. The combined Bijou-Cimarron interchange  
49 complex was reported to require 5.52 acres, affecting 17 commercial and industrial parcels and resulting  
50

1 in 11 business relocations. No residential relocations were found to be necessary for the Cimarron TUDI  
2 interchange project. This information is found in I-25 EA, Appendix 2, Right-of-Way Technical  
3 Memorandum, page 3. With regard to the southwestern quadrant of the I-25 Cimarron interchange,  
4 that source specifically indicated that partial takes would be needed from a broadcasting company, a  
5 landscaping business, the Pikes Peak Humane Society, and a discount store (i.e., Walmart SuperCenter).  
6

#### 7 US 24 West Corridor EA Findings in 2012 regarding Right-of-Way

8 Based on US 24 West corridor traffic needs, the US 24 EA recommended the SPDI configuration for the  
9 Cimarron interchange and therefore ROW needs were reassessed. Appendix E to the October 2014  
10 FONSI estimated the right-of-way needs for the I-25 Cimarron to be 8.28 acres, excluding a 2.9-acre  
11 parcel already acquired by CDOT. This results in a total of 11.18 acres in the vicinity of the I-25 Cimarron  
12 interchange.  
13

14 The ROW needs for the SPDI interchange as identified in the US 24 EA exceed those identified in the I-25  
15 EA in part due to the freeway ramps flaring outward (in the SPDI) to achieve acceptable traffic approach  
16 angles at the interchange beneath the freeway. All increased ROW needs occur in the southwestern  
17 quadrant of the interchange, as the freeway ramps in the other quadrants were accommodated by the  
18 previously existing and planned ROW. As approximate estimates, the I-25 EA TUDI design required about  
19 one acre in the southwestern quadrant, changing to the SPDI increased this to two acres, and an  
20 additional 4.5 acres are needed to accommodate the future US 24 West improvements.  
21

#### 22 New Information regarding Right-of-Way

23 Estimated ROW needs for the I-25 Cimarron have been refined during the process of preparing the  
24 project for the design-build procurement process. Figure 6 depicts the affected ROW parcels, which are  
25 described below.  
26

27 In 2013, CDOT used advanced acquisition to purchase three needed ROW parcels in the northwestern  
28 quadrant of the interchange, as follows:  
29

- 30 A. 215 S. Chestnut Street
- 31 B. 221 S. Chestnut Street
- 32 C. 331 S. Chestnut Street  
33

34 These acquisitions, totaling 4.14 acres, have already resulted in business relocations, consistent with the  
35 I-25 EA. To implement the I-25 Cimarron SPDI interchange, no further relocations will be needed.  
36

37 No acquisitions are needed in the northeastern quadrant of the interchange, adjacent to Monument  
38 Creek and America the Beautiful Park.  
39

40 No acquisitions are needed in the southeastern quadrant of the interchange, adjacent to Fountain Creek  
41 and the Colorado Springs Utilities (CSU) Martin Drake Power Plant. CSU is transferring 0.104 acre of its  
42 land (identified with an asterisk in the figure) to the City of Colorado Springs to accommodate a sidewalk  
43 along Cimarron Street east of the interchange. CDOT will not own this land adjacent to the city's street.  
44

45 Partial acquisitions (no full takes) will be needed from a number of parcels adjacent to the southbound  
46 on-ramp in the southwestern quadrant of the interchange. Table 4 presents the impacts to these  
47 properties, according to the most recent (July 2014) CDOT ROW plans for the interchange.  
48

49 Earlier in this reevaluation, the description of the Proposed Action noted that a future US 24 corridor  
50 project (per the approved US 24 EA and 2014 FONSI) will include improvements at the I-25 Cimarron

1 interchange. Figure 6 juxtaposes the ROW impacts figure shown earlier with a diagram showing how  
 2 future US 24 improvements (dark blue) will be added to the current proposed SPDI configuration  
 3 (green). As part of the US 24 project, a new US 24 southbound on-ramp (to I-25) will be built west of the  
 4 SPDI southbound on-ramp. This results in a considerable widening of the overall interchange ROW,  
 5 affecting all of the numbers parcels shown in the figure.  
 6

7 **Table 4. I-25 Cimarron Interchange Southwestern Quadrant Property Impacts (all areas in acres)**

Map ID	Owner/Use	ROW needed	Easements	
			Permanent	Temporary
1	Pikes Peak Broadcasting	3.152		
2	Harry Hoth	0.081		
3	Humane Society, 630 Abbott	0.897		0.150
4	City of Colorado Springs	0.798		
5	Humane Society, 610 Abbott	0.142 0.409		
6	City – Abbott Lane cul de sac	0.027		
7	Wal-Mart SuperCenter	0.980	0.282 0.068	
8	City – Bear Creek drainage		0.024	
	<b>Totals</b>	<b>6.486</b>	<b>0.374</b>	<b>0.150</b>
	City of Colorado Springs Internal Property Transfer	0.104		

8  
 9  
 10 Rather than go to each of the affected landowners twice, first to acquire land for the I-25 project and  
 11 later to acquire land for the US 24 project, CDOT plans to acquire the combined ultimate ROW for both  
 12 projects as it prepares to construct the I-25 Cimarron interchange. This is true in the southwestern  
 13 quadrant, but not the southeastern. As CDOT does not need any ROW from Colorado Springs Utilities for  
 14 the I-25 Cimarron project, it will not be acquiring land for the southeastern quadrant loop ramp at this  
 15 time. All of the ROW needed for both projects combined was identified and disclosed in the approved  
 16 US 24 EA (2012) and FONSI (2014). ROW acquisition for both projects is being pursued concurrently as a  
 17 matter of expedience and cost-effectiveness.  
 18

19 Mitigation for Right-of-Way Impacts

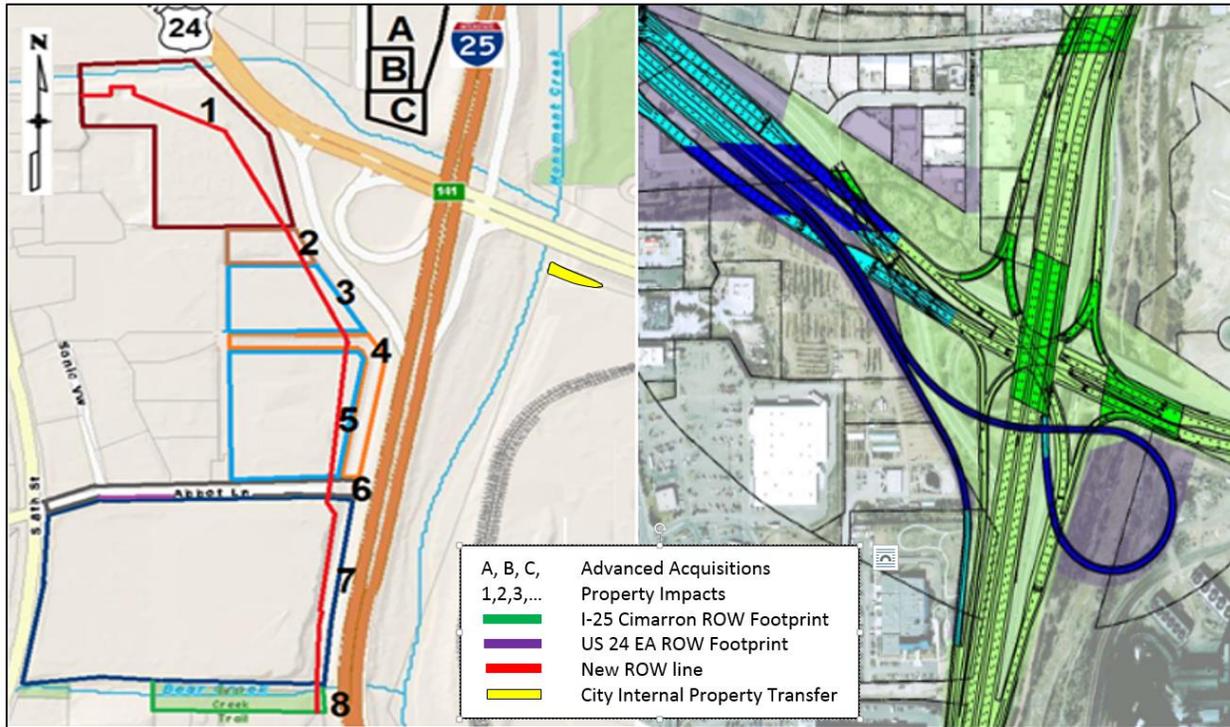
20 There is no change to previously identified mitigation commitments and all property acquisitions will  
 21 occur in compliance with the Uniform Relocation Assistance and Real Property Acquisitions Policies Act  
 22 of 1970, as amended. In the event that any additional ROW is needed beyond what was identified in the  
 23 two approved EAs, CDOT and/or the design-build contractor would be required to acquire those in  
 24 compliance with the Uniform Act as well.  
 25

26 Conclusion for Right-of-Way

27 Currently-identified right-of-way needs for the Proposed Action are consistent with the needs identified  
 28 in the previous EAs.  
 29

30 The project will not result in new residential or business relocations beyond what has already been  
 31 completed or in process of acquisition (i.e. Walmart and Pikes Peak Humane Society) through advance  
 32 right-of-way acquisition. Any new acquisitions identified by the design build contractor must coordinate  
 33 with CDOT ROW agents and follow the Uniform Act.  
 34

1 **Figure 6. I-25 Cimarron Interchange Affected Right-of-Way Parcels and Future US 24 Corridor**  
 2 **Improvements**



3  
4  
5  
6  
7 **ECONOMIC RESOURCES**

8  
9 I-25 EA Findings in 2004 regarding Economic Resources

10 Page 3-17 of the I-25 EA discussed economic impacts of the 26-mile corridor project as a whole, noting  
 11 that improved mobility on the region’s only freeway and the temporary construction employment from  
 12 the half-billion dollar project would outweigh the adverse impacts of relocating 16 businesses and  
 13 displacing five households. As I-25 is a critical route for summer tourism, military readiness, and access  
 14 to the central business district, I-25 mobility is critical to the sustainability of the key regional  
 15 employment sectors. It also noted that private property conversion to public right-of-way use would  
 16 have minimal effects on regional property tax revenues.

17  
18 US 24 West Corridor EA Findings in 2012 regarding Economic Resources

19 The US 24 West corridor EA included preparation of a detailed 162-page economic study of the US 24  
 20 corridor between I-25 and Manitou Springs. This 2006 report indicated that improved US 24 mobility  
 21 with the Proposed Action would expand the market area for local businesses while deteriorating  
 22 mobility with the No-Action Alternative would shrink the market area. Traffic congestion on US 24 at its  
 23 various intersections, including the I-25 Cimarron interchange, is a problem today that will continue to  
 24 worsen in the future with continuing regional growth.

25  
26 New Information regarding Economic Resources

27 Due to poor traffic operations, the existing I-25 Cimarron interchange does not foster economic  
 28 development. It is increasingly recognized as a traffic bottleneck and a safety concern in part because so  
 29 much of the I-25 corridor has been improved and no longer experiences these problems. (The corridor’s

1 other unimproved interchange, at Fillmore Street, has undergone an EA reevaluation and is now  
2 scheduled to begin reconstruction by the end of 2014.) Reconstructing the I-25 Cimarron interchange is  
3 a top regional priority and is tied to plans for nearby redevelopment.  
4

5 As part of a statewide economic development initiative, the City of Colorado Springs “City for  
6 Champions” program will construct two new urban attractions in lower downtown. The United States  
7 Olympic Museum and the Colorado Sports and Event Center are both planned for the Southwest  
8 Downtown Urban Renewal Area, for which the Cimarron interchange is the closest and most logical  
9 Interstate access point.  
10

11 Traffic operations at the I-25 Cimarron interchange are important to, and affected by, trips made to  
12 nearby commercial areas on South 8<sup>th</sup> Street. Numerous stores and restaurants are located there,  
13 anchored by a Walmart SuperCenter that was built in 1996. Considerable commercial development  
14 occurred between 1996 and 2004 (when the I-25 EA was approved), and some additional development  
15 has continued to occur. Interstate 25 and US 24 are roadway links that carry a portion of the traffic with  
16 origins or destinations in the South 8<sup>th</sup> Street commercial area. This is the closest major traffic generator  
17 to the I-25 Cimarron interchange. The development is largely not new since 2004, but its traffic  
18 generation has become more pronounced over time.  
19

20 Adjacent to the I-25 Cimarron interchange, America the Beautiful Park was planned concurrently with  
21 the I-25 EA. The completed park was dedicated in September 2005. The 21-acre park draws moderate  
22 daily (free) use but also hosts occasional events that attract larger crowds. The park is an amenity but  
23 not a generator of economic activity, as no commercial goods or services are normally offered for sale  
24 there.  
25

26 Several industrial businesses in the northwestern quadrant of the I-25 Cimarron interchange have been  
27 acquired for right-of-way by CDOT. These acquisitions are consistent with the 2004 I-25 EA and do not  
28 represent a new or additional project impact. Additionally CDOT has acquired a motel at US 24 and  
29 Eighth Street to accommodate US 24 improvements. Colorado Springs is a rapidly growing metropolitan  
30 area, so businesses acquired for ROW purposes generally will relocate elsewhere in the region as there  
31 is an ongoing demand for their services. This would shift the specific location of particular economic  
32 activity, but be unlikely to diminish economic activity at the aggregate regional level.  
33

34 The I-25 Cimarron interchange is a major transportation node linking the region’s main north-south  
35 highway and main east-west highway, and is also an important gateway to and from lower downtown  
36 Colorado Springs. Therefore, any construction-related travel delays at this location will adversely affect  
37 commuters, tourists, and regional commerce in general. CDOT will endeavor to maintain lanes open to  
38 traffic throughout the construction period while also minimizing the duration of the construction period  
39 to the extent practicable.  
40

41 A positive impact of roadway construction activity is the creation or temporary construction jobs in the  
42 area. Construction worker salaries will be spent on food, lodging, meals, entertainment and other  
43 purchases in the region, having a multiplier effect as the money gets spent again by the businesses that  
44 initially see these increased expenditures. A recent national report (NCHRP 08-36, 2012) study indicated  
45 that each \$1 million spent on roadway construction generates 10.55 primary jobs. The I-25 Cimarron  
46 interchange project is expected to cost approximately \$115 million, so it should generate about 1,200  
47 primary jobs for a period of up to two years, as the project is expected to be last from 2015 to the end of  
48 2017.  
49

1 As a longer term effect, improved mobility at this location may directly benefit the nearby lower  
2 downtown Colorado Springs redevelopment area, contributing to the successful development of the  
3 proposed City for Champions facilities mentioned earlier.  
4

#### 5 Mitigation for Economic Impacts

6 No new or additional mitigation needs have been identified in this reevaluation.  
7

#### 8 Conclusion for Economic Resources

9 The economic impacts of constructing the I-25 Cimarron interchange project remain essentially  
10 unchanged and minimal with regard to right-of-way acquisition, and these several relocations of small  
11 businesses have already taken place. However, the economic importance of improved mobility, safety  
12 and accessibility have been spotlighted by the US 24 EA Economic Impacts Study and by the City of  
13 Colorado Springs “City for Champions” program.  
14

---

## 16 ENVIRONMENTAL JUSTICE

### 18 I-25 EA Findings in 2004 regarding Environmental Justice

19 The I-25 EA examined the 26-mile I-25 corridor widening project that included the I-25 Cimarron  
20 interchange, and concluded that the Proposed Action would not cause disproportionately high and  
21 adverse effects to minority and low-income populations (EA page 3-22). Accordingly, no mitigation was  
22 needed.  
23

### 24 US 24 West Corridor EA Findings in 2012 regarding Environmental Justice

25 The US 24 West Corridor EA examined the same 2000 Decennial Census data for the I-25 Cimarron  
26 interchange vicinity. Its results suggest that the interchange area has low-income residents and minority  
27 residents, based on data at the Census block-group level.  
28

### 29 New Information regarding Environmental Justice

30 Examination of the more recent 2010 Census at the Census block level found that most of the project  
31 area actually has no residential population. Residences are found only in the northwest quadrant of the  
32 interchange, separated from I-25 and from US 24 by industrial land use in-between. Residential areas  
33 were found in four block groups contained in Census Tract 15. In the populated portion, the total of 72  
34 residents, of whom 71 were white alone and one self-declared as multi-racial. Of the 72 total residents  
35 in the project area, 6 (8.3%) were Latinos. It is concluded that the interchange vicinity is not a minority  
36 area.  
37

38 Over the past decade, the I-25 Cimarron interchange vicinity has experienced notable concentrations of  
39 homeless persons. The nearby Marian House soup kitchen at 14 West Bijou Street provides free meals  
40 every day of the year, and the nearby Monument Valley Park, America the Beautiful Park, and  
41 downtown City Library provide nearby places to congregate. Homeless camping on public lands,  
42 especially along Fountain and Monument creeks, prompted the Colorado Springs City Council to  
43 institute a ban on this activity in February 2010 and to create a Homeless Outreach Team within the  
44 Colorado Springs Police Department. As recently as 2012, despite the ban, a half dozen persons were  
45 living under the I-25 Cimarron Bridge, according to local news media reports.  
46

47 Just as the I-25 Cimarron interchange is the confluence of the region’s two main highways and its two  
48 main waterways, it is also the confluence of the region’s two main trails for non-motorized travel. The  
49 Pikes Peak Greenway is part of a planned Front Range trail traversing the State of Colorado, and the

1 east-west Midland Trail is part of a planned 76-mile America the Beautiful trail system extending from  
2 Falcon to Cripple Creek. These trails have been developed for recreational purposes, but to the extent  
3 that low-income populations use them for local, regional or inter-regional trips, due to lack of access to  
4 a private automobile, the trails provide an important transportation network for low-income  
5 populations. As part of the I-25 Cimarron project, CDOT is adding sidewalks and a pedestrian bridge as  
6 well as upgrading the Midland Trail crossing of I-25 to a more aesthetically pleasing condition. The  
7 sidewalks and pedestrian bridge are new features not previously noted in the I-25 EA.

#### 8 9 Mitigation for Environmental Justice Impacts

10 CDOT has an ongoing commitment to coordinate with affected stakeholders throughout project design  
11 and construction. Homeless persons in the interchange area are one such stakeholder group. To ensure  
12 the safety and well-being of this population, CDOT will coordinate with the Colorado Springs Police  
13 Department Homeless Outreach Team (HOT) to provide information and advance notice of construction  
14 activities that homeless persons should avoid.

#### 15 16 Conclusion for Environmental Justice

17 The I-25 Cimarron interchange project will not displace any households. It may result in the dislocation  
18 of some low-income homeless persons who inhabit the vicinity illegally on a transient basis.  
19 The interchange project will not result in disproportionate adverse effects to low-income or minority  
20 populations. The project will benefit persons of all races, ethnicities and income levels by improving  
21 safety and mobility at the connection of the region's primary north-south highway and primary east-  
22 west highway.

---

## 24 25 **HISTORIC RESOURCES**

### 26 27 I-25 EA Findings in 2004 regarding Historic Resources

28 The Depression-era Works Progress Administration (WPA) floodwall (# 5EP3856) at Monument Creek,  
29 from south of Bijou Street to the Midland Railroad is the only identified historic resources in the project  
30 area. The I-25 EA indicated that the Proposed Action was going to impact 1,530 square feet of the WPA  
31 wall immediately south of Colorado Avenue. This impact and its mitigation have already occurred, as  
32 part of the I-25 COSMIX widening project that was completed in 2007. The I-25 Cimarron interchange  
33 project is being designed to avoid impacting a new section of the floodwall.

### 34 35 US 24 West Corridor EA Findings in 2012 regarding Historic Resources

36 The US 24 West Corridor EA approved in 2012 examined historic properties in the 4-mile US 24 corridor  
37 including the I-25 Cimarron interchange. In consultation with the State Historic Preservation Officer and  
38 other interested parties, it was concluded that the US 24 project would result in an adverse effect to five  
39 individual historic properties, none of which are in the vicinity of the interchange. The closest affected  
40 historic site is located west of 8<sup>th</sup> Street.

41  
42 The US 24 EA also identified a potential Westside Historic District, bounded on the east by I-25 and on  
43 the south by US 24. The I-25 Cimarron project will not have any impacts to any properties with the  
44 district boundary and no work will occur within the historic district boundary.

45  
46 The US 24 EA evaluated the potential historic eligibility of the city's Martin Drake Power Plant, located in  
47 the southwestern quadrant of the I-25 Cimarron interchange. It was concluded that this power plant  
48 was not eligible for listing to the National Register of Historic Places. The SHPO concurred with this  
49 assessment in the Section 106 process for the US 24 EA in September 2010.

1  
2 New Information regarding Historic Resources

3 As part of this reevaluation, additional resources were evaluated because they have recently become 50  
4 or more years old:

- 5  
6
  - US Highway 24 (5EP4118.7) itself,
  - the Cimarron Street bridge over Fountain Creek east of I-25 (CSG-  
7 F.85-08.23, 5EP7404), and
  - The Denver & Rio Grande Railroad Spur to the City of Colorado  
8 Springs Light and Power Plant (5EP2181.25).

**Attachment 7** provides documentation of the 2014 supplemental historic resources evaluation and consultation.

9  
10  
11  
12 CDOT evaluated these properties and determined that the Denver & Rio  
13 Grande Railroad spur (5EP2181.25) is significant under National Register of  
14 Historic Places (NRHP) Criterion A and is eligible for listing, but that the  
15 West Cimarron Bridge (5EP7404) is not eligible. Because neither property would be affected, CDOT  
16 determined that the project results in a finding of No Historic Properties Affected. In a response dated  
17 October 6, 2014, the State Historic Preservation Office (SHPO) concurred with CDOT's determinations of  
18 eligibility for these two resources and with the finding of No Historic Properties Affected for the I-25  
19 Cimarron Interchange project.

20  
21 Consultation included sending the determinations to the consulting parties and invited signatories to the  
22 MOA (City of Colorado Springs Parks, Recreation, and Cultural Services Department, US Air Force  
23 Academy); to a consulting party and concurring party to the MOA (City of Colorado Springs Historic  
24 Preservation Board, a Certified Local Government); and to the National Park Service, which was involved  
25 because of the Cadet Area National Historic Landmark. The submittal was also sent to a variety of  
26 interested parties for informational purposes--these include Penrose Library, Tutt Library, Pioneer  
27 Museum, Western Museum of Mining and Industry, Historic Preservation Alliance of Colorado Springs,  
28 Friends of Monument Valley Park, Old North End Historic Preservation Committee, and Judith Rice-  
29 Jones. Of all of these parties, the US Air Force Academy responded that they no comments. Please see  
30 Attachment 7 for details regarding this assessment and its current status.

31  
32 The updated design for the I-25 Cimarron interchange will not result in any impact to the WPA floodwall  
33 (5EP3856) impacted previously by the COSMIX project or any new section of the wall.

34  
35 Mitigation for Effects to Historic Resources

36 Given that there are no impacts to historic resources, no mitigation is required for this project.

37  
38 Conclusion for Historic Resources

39 Due to the passage of time and the proposed revision to the interchange configuration, it was necessary  
40 to reassess potential impacts to historic properties from the I-25 Cimarron interchange project. This  
41 effort reconfirmed the I-25 EA's findings regarding the WPA flood control wall and the US 24 EA's  
42 findings regarding the Westside Historic District. Following a review, no previously unidentified historic  
43 resources were found in the project area. No historic resources will be impacted by this project.

1 **VISUAL RESOURCES**

2  
3 I-25 EA Findings in 2004 regarding Visual Resources

4 The I-25 EA indicated that its Proposed Action would alter the visual setting for the planned (now  
5 completed) America the Beautiful Park and for various trails that cross or closely parallel I-25 in the  
6 vicinity of the I-25 Cimarron interchange. The park and the trails were built during the past couple of  
7 decades next to the Interstate Highway that opened in 1960. Notably, the City of Colorado Springs in  
8 2002 indicated that visibility between the park and the freeway was important to them and they did not  
9 want any noise barrier built that would reduce or eliminate this visibility, especially views from the park  
10 towards Pikes Peak.

11  
12 US 24 West Corridor EA Findings in 2012 regarding Visual Resources

13 The revised interchange configuration would not meaningfully alter the visual effects as compared to  
14 the original configuration. The US 24 EA process also included coordination with affected stakeholders  
15 regarding aesthetic aspects of the I-25 Cimarron interchange, including both manmade structures and  
16 modified creek landscaping.

17  
18 New Information regarding Visual Resources

19 The I-25 Cimarron interchange project has further refined the structural and landscaping design  
20 concepts that were developed as part of the US 24 EA through an aesthetic working group with  
21 extensive stakeholder input. The 21 members of this working group included representatives from  
22 CDOT, the mayor’s office, city, county and regional planning staff, a nearby homeowners association,  
23 city parks staff, trail groups, watershed groups, and  
24 economic development advocates.

25 The results of the efforts of the working group are  
26 reflected in the November 7, 2014 Aesthetics Plans  
27 and Details developed for the project. Notably, as  
28 illustrated in Figure 7, an aquatic motif was selected  
29 for use on a prominent retaining wall to reinforce the  
30 regional importance of the nearby confluence of  
31 Monument Creek and Fountain Creek. The plan also  
32 includes a detailed illumination plan for the  
33 interchange project. Lighting of bridges and trails will  
34 be used prominently to improve safety and the  
35 aesthetic quality of the interchange at night.

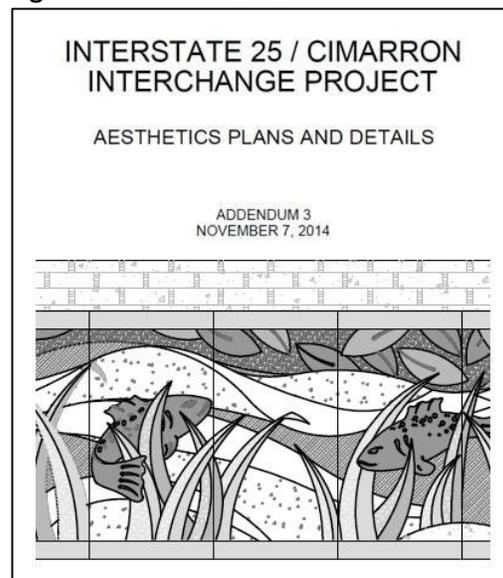
36  
37 Mitigation for Effects to Visual Resources

38 The I-25 EA included two mitigation commitments  
39 relevant to visual resources in the vicinity of the I-25  
40 Cimarron interchange project: (1) Design guidelines  
41 have been developed to ensure overall consistency  
42 of roadway features. Aesthetic elements will be  
43 developed to be appropriate for the local surroundings; and (2) Lost native trees and shrubs will be  
44 replanted. These commitments remain applicable and no new or additional mitigation is needed for this  
45 I-25 EA reevaluation.

46  
47 Conclusion for Visual Resources

48 An aesthetics plan has been developed with broad based support and buy-in from local community and  
49 business leaders, as detailed above.

Figure 7. Aesthetics Plan



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1

## 2 **TRANSPORTATION RESOURCES**

3

### 4 I-25 EA Findings in 2004 regarding Transportation Resources

5 The I-25 EA thoroughly examined the need for capacity improvement to alleviate existing and future  
6 congestion. It identified proposed interchange configurations based on traffic forecasts for the 2025  
7 planning horizon year than in effect. It also noted potential disruption to various public transit routes  
8 then in operation.

9

### 10 US 24 West Corridor EA Findings in 2012 regarding Transportation Resources

11 The US 24 EA examined the mobility needs of the US 24 corridor and proposed changing the I-25  
12 Cimarron interchange configuration to a Single Point Urban Interchange (SPUI), based on consideration  
13 of 2035 projected traffic volumes. The US 24 EA Proposed Action plans for making various ramp  
14 modifications, notably adding an eastbound-to-northbound loop ramp in the southeastern quadrant of  
15 the I-25 Cimarron interchange, in the future to accommodate US 24 corridor improvements.

16

### 17 New Information regarding Transportation Resources

18 The I-25 Cimarron interchange project incorporates the revised interchange configuration as  
19 recommended in the approved US 24 EA. This configuration not only meets the needs of the I-25  
20 corridor but also better meets the needs of US 24 traffic.

21

22 It was determined through traffic analysis that inclusion of a northbound auxiliary lane between I-25's  
23 Tejon Street on-ramp and Cimarron Street's off-ramp would substantially improve weaving movements  
24 and traffic flow, so this design feature is included in the Proposed Action. Users of this highway segment  
25 know well that the existing northbound on-ramp from Tejon Street is too short given the heavy traffic  
26 and weaving movements occurring on this major highway curve. The Proposed Action will also smooth  
27 out the curve slightly.

28

29 The COSMIX project's widening of I-25 completed in 2007 has provided sufficient capacity to meet  
30 current traffic demand, as the I-25 EA anticipated. High-occupancy vehicles are not yet needed but  
31 remain part of the approved Proposed Action, identified as the final phase of the project. HOV lane  
32 effectiveness increases greatly if the lanes are also used by public transit. However, due to funding  
33 constraints, the public transit system serving the Colorado Springs region has not grown in the past  
34 decade, since the I-25 EA was completed. Nevertheless, I-25 remains the region's most heavily traveled  
35 roadway and its logical candidate for the region's first HOV lanes when demand warrants.

36

37 The I-25 EA identified various individual bus routes that might be temporarily disrupted by interchange  
38 construction projects. Many bus routes have changed since the EA was completed. Currently (mid 2014)  
39 no bus routes use Interstate 25 through the I-25 Cimarron interchange, and only one route uses  
40 Cimarron Street through the interchange. Route 4 follows Nevada Avenue southward from downtown,  
41 takes Cimarron Street from Nevada Avenue across I-25 to 8<sup>th</sup> Street, then follows 8<sup>th</sup> Street southward  
42 from that point. This route would be affected by the I-25 Cimarron interchange project and was not  
43 specifically mentioned in the I-25 EA. Due to limited available east-west crossings of I-25, this route may  
44 be diverted to Colorado Avenue if Cimarron Street traffic is disrupted by interchange construction.

45

46 It was noted earlier in the discussion of Section 6(f) resources that the existing pedestrian bridge across  
47 Monument Creek will no longer lead trail users directly to a crossing of I-25. For the convenience of trail  
48 users, CDOT has decided to construct a second pedestrian bridge across the creek at the southern end  
49 of America the Beautiful Park, connecting directly to the new replacement crossing of I-25 along

1 Fountain Creek. This new bridge from the park to the Pikes Peak Greenway is an enhancement that goes  
2 beyond the required Section 6(f) property replacement. This transportation enhancement feature is a  
3 part of the Proposed Action and does not constitute a mitigation action.  
4

#### 5 Mitigation for Effects to Transportation Resources

6 The I-25 EA contained two mitigation commitments that apply generally to most highway projects: (1)  
7 The existing number of lanes will be maintained during construction. Construction phasing will be done  
8 to minimize the number of times that traffic must be diverted to other lanes. CDOT will provide the  
9 public with advance notice of any detours or closures. (2) When lane closures are unavoidable, they will  
10 occur only at night or during off-peak hours, and not during planned special events. These commitments  
11 remain applicable to the Cimarron interchange project.  
12

13 Additionally, the EA contained a transit mitigation measure for a different route impact that is applicable  
14 to the currently foreseen Route 4 impact: CDOT will coordinate construction planning with the Transit  
15 Services staff with the City of Colorado Springs [now Mountain Metro Transit] to ensure that bus service  
16 near construction sites is maintained.  
17

#### 18 Conclusion for Transportation Resources

19 The revised configuration for the I-25 Cimarron interchange not only meets I-25 corridor needs but also  
20 the newly-identified US 24 West corridor needs and is compatible with future US 24 West proposed  
21 improvements. Temporary disruption to Mountain Metro Route 4 (South 8<sup>th</sup> Street) is a newly identified  
22 impact of the current interchange improvement project.  
23

---

## 25 **CUMULATIVE EFFECTS**

### 26 I-25 EA Findings in 2004 regarding Cumulative Effects

27 The I-25 EA examined cumulative effects for a 26-mile corridor of the region's only freeway and most  
28 important roadway. The analysis also considered that transportation improvements were planned for  
29 three other major corridors: Powers Boulevard (north-south), Woodmen Road (east-west), and Drennan  
30 Road (east-west, now Milton E. Proby Parkway). This was a big-picture look at large-scale regional  
31 issues. It did not focus particularly on the I-25 Cimarron interchange. At the time, the US 24 West  
32 Corridor was not reasonably foreseeable as it did not have funding and its EA had not yet been  
33 prepared. US 24 West is a major regional corridor comparable to the other three listed above. Six main  
34 topics were explored: transportation, land use, air quality, water resources, noise and visual character.  
35  
36

### 37 US 24 West Corridor EA Findings in 2012 regarding Cumulative Effects

38 The US 24 EA cumulative effects discussion was largely based on the regional cumulative effects  
39 analysis, but focused more closely on the US 24 West corridor, and the upper Fountain Creek watershed,  
40 with its associated water and ecological issues.  
41

42 With increased impervious surface area, the western side of Colorado Springs is increasingly vulnerable  
43 to potential flooding, as evidenced by major flood damage to US 24 corridor bridges in 1999. Visual  
44 resources are also important as US 24 West is roadway carrying residents and tourists to the region's  
45 scenic features including the Garden of the Gods and Pikes Peak. Regarding land use, a major residential  
46 development called Gold Hill Mesa was planned adjacent to US 24 on a Brownfields Site consisting of  
47 land contaminated from processing of gold ore tailings. This development will generate additional traffic  
48 contributing to worsened congestion on US 24, including its most heavily traveled eastern end from  
49 South 8<sup>th</sup> Street to I-25.

1 Floodplains in the I-25 interchange vicinity are affected by both I-25 improvements along Monument  
2 Creek and US 24 West improvements along Fountain Creek. The US 24 West project will provide  
3 improved flood control that will reduce the size of the Fountain Creek floodplain.  
4

#### 5 New Information regarding Cumulative Effects

6 In response to 1999 flooding, various drainage improvements were made along the US 24 West corridor,  
7 and the creek is now more sustainable with regard to handling major precipitation events. Flood events  
8 have occurred along US 24 in Ute Pass and Manitou Springs following the 2012 Waldo Canyon Fire that  
9 burned approximately 18,000 acres and forest upstream. Heavy rains falling on the fire's de-vegetated  
10 burn scar have resulted in major stormwater runoff, damaging US 24 and causing numerous  
11 precautionary closings of the highway, as well as causing road and property damage in Manitou Springs.  
12 The sediment-laden runoff degraded Fountain Creek ecologically, but the runoff that caused flooding  
13 upstream in the Fountain Creek watershed was safely handled along the 4-mile US 24 West corridor  
14 from Manitou Springs to I-25. Despite major revegetation and mitigation efforts undertaken to date,  
15 burn scar flooding will remain a concern in the region for many years to come.  
16

17 In response to recurring floods along Fountain Creek, authorities have relocated and graded the creek  
18 several times. Recent channel improvements have occurred in conjunction with the Gold Hill Mesa  
19 development project and also a result of extensive analysis completed as part of the US 24 EA.  
20 Additional stream modifications planned as part of the I-25 Cimarron interchange (basic configuration  
21 and AREs) represent a continuation of regional efforts to harmonize the creek with its surroundings.  
22 The I-25 Cimarron interchange project will further improve the vitality of Fountain Creek by removing  
23 noxious weeds and non-native trees. The construction project will clean up areas degraded by illegal  
24 homeless camping (e.g., fecal matter, broken glass, discarded syringes) and CDOT's MS4 compliance will  
25 newly treated stormwater runoff before it can enter the creek.  
26

27 Improvements to I-25 over the past decade have made the I-25 Cimarron interchange an increasingly  
28 obvious transportation bottleneck and safety issue. The City's development of America the Beautiful  
29 Park and its current City for Champions planning for new sports venues in lower downtown Colorado  
30 Springs are focusing increased attention on the I-25 Cimarron interchange as a gateway into downtown  
31 needing mobility and aesthetic improvement. The I-25 Cimarron interchange project includes new  
32 sidewalks and an added pedestrian bridge along the southern edge of America the Beautiful Park. These,  
33 coupled with relocation and upgrading of the Midland Trail crossing of I-25, should help to achieve  
34 better non-motorized travel connectivity between lower downtown Colorado Springs and the  
35 neighborhoods of the City's near Westside.  
36

37 Both the I-25 Cimarron interchange project and the planned US 24 improvements will require right-of-  
38 way from the Humane Society of the Pikes Peak Region, located along the southbound on-ramp to I-25.  
39 Anticipating impacts to their property, the Humane Society recently purchased the adjacent property  
40 north of their original site for planned facility expansion. The adverse effect of right-of-way acquisition  
41 and increased traffic noise at this important regional facility may be partially offset by eventual  
42 improved accessibility to their site with the eventual construction of these roadway projects.  
43

#### 44 Mitigation for Cumulative Effects

45 The direct and indirect effects of the I-25 Cimarron project, combined with the effects of the reasonably  
46 foreseeable US 24 EA Proposed Action, have already been taken into account in the design of the US 24  
47 Proposed Action, which includes the current proposed configuration of the I-25 Cimarron interchange.  
48 Therefore no additional mitigation will be needed as part of the current project.  
49

1 Conclusion for Cumulative Effects

2 The revised configuration for the I-25 Cimarron interchange meets the needs of both I-25 and US 24  
3 through the planning horizon year of 2035. It incorporates water quality and aesthetic treatments  
4 identified in the US 24 EA process. The current configuration better meets the needs of the two  
5 transportation corridors than did the original proposed configuration that was developed prior to the US  
6 24 West planning process. The revised configuration is fully consistent with the multi-corridor Regional  
7 Cumulative Effects Analysis that was developed in conjunction with the I-25 EA.

8  
9 The approved US 24 EA (May 2012) and FONSI (November 2014) reviewed the cumulative effects of the  
10 US 24 Proposed Action, as well as the I-25 Cimarron interchange, I-25 corridor improvements, and other  
11 past, present and reasonably foreseeable actions, in the context of the regional cumulative effects  
12 analysis that was prepared in 2003 as part of the I-25 EA process. This project, with the proposed  
13 mitigation, has a neutral impact on resource and is consistent with the cumulative effects analysis from  
14 the I-25 improvements through the Colorado Springs Urbanized Area EA and FONSI .

15  
16  
17 **C. Resources with No Change, Thus No New Analysis Required**

18  
19 No new information, regulations, analytical tools or project changes result in the need for any new  
20 analysis for the following resources:  
21

Archaeological	Energy
Paleontological	Land Use
Railroads	Social Resources
Utilities	Farmlands (none present)
Geologic/Soil Issues	

22  
23  
24 **D. Design-Build Considerations**

25  
26 This reevaluation has discussed the potential impacts of the I-25/Cimarron interchange project to the  
27 extent that they are understood based on the conceptual design that has been developed to date and  
28 provided to prospective design-build contractors. Under traditional design-bid-build project delivery,  
29 project plans are developed and contractors bid their costs to construct that project. Under design-  
30 build project delivery, conceptual plans are developed to a less-detailed level, giving contractors the  
31 flexibility to develop final designs in ways that can save time and money. Since less detail is known about  
32 the design (under design-build, compared with conventional delivery), there is a greater chance for  
33 resulting environmental impacts to differ from what is expected at the time of environmental clearance.  
34 Nevertheless, the project requirements provided to prospective design-build contractors are understood  
35 in sufficient detail to allow the environmental process to be completed.

36  
37 The two project delivery methods discussed above are also very similar in that CDOT looks for ways in  
38 final design to avoid environmental impacts and to minimize unavoidable impacts beyond the efforts  
39 already undertaken in the environmental process. Minor design changes often arise in final design for  
40 conventional delivery projects as well (not just for design-build delivery). Under either delivery method,  
41 design changes can result in the need for additional interagency consultation or permit changes with  
42 regard to one or more resources. Under either delivery method, time is usually of the essence, so there

1 is an incentive to avoid making design changes that would result in time-consuming additional  
2 environmental analysis and issue resolution.

3

4 Summarizing, use of design-build delivery for the I-25 Cimarron interchange project slightly increases  
5 the probability that design changes may result in environmental impacts beyond those described in this  
6 reevaluation. If design changes do result in additional environmental impacts, those will be addressed  
7 and resolved with appropriate consulting or regulatory agencies during the design-build process. The  
8 contractor will be required to develop an environmental Compliance Work plan to monitor, track and  
9 report compliance with environmental commitments.