

Appendix B. Agency Correspondence

**US 550 South Connection to US 160
SUPPLEMENT to the US Highway 160 from Durango to Bayfield EIS
RECORD OF DECISION
Appendix B: Agency Correspondence**

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Date	Correspondence
July 3, 2012	Letter from FHWA (Stephanie Gibson) to USEPA (Pearl Young) submitting SFEIS for Federal Register
July 10, 2012	Letter from FHWA (Stephanie Gibson) to Interested Parties re: SFEIS NOA
July 17, 2012	Letter from FHWA (Stephanie Gibson) to Interested Parties transmitting corrected pages and additional pages of SFEIS
July 17, 2012	Letter from FHWA (Stephanie Gibson) to Interested Parties transmitting corrected version of SFEIS
July 18, 2012	Letter from FHWA (Stephanie Gibson) to USEPA (Dawn Roberts) submitting corrected SFEIS for Federal Register
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August 1, 2012	Letter from FHWA (John Cater) to Thomas McNeill re: Webb comments on Memorandum of Agreement
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October 24, 2014	Letter from Tony Cady (CDOT) to Kara Hellige (USACE) transmitting information about changes in existing conditions and impacts to wetlands and other Waters of the U.S.
November 3, 2014	USFWS Concurrence Letter on Southwestern willow flycatcher and New Mexico jumping mouse
December 2, 2014	Section 404/NEPA merger termination request letter from CDOT to USACE
December 19, 2014	Response letter from USACE to CDOT re: Section 404/NEPA merger termination request
January 16, 2015	Letter from Jane Hahn (CDOT) to SHPO and consulting parties transmitting revised information on eligibility and effects to historic properties
January 20, 2015	Section 106 consultation (CDOT eligibility and effects letter to Peggy Cooley re: Alternatives R5 and RGM6)
January 20, 2015	Section 106 consultation (CDOT eligibility and effects letter to Dickinson Wright PLLC [Edward H. Pappas] re: Alternatives R5 and RGM6)
January 20, 2015	Section 106 consultation (CDOT eligibility and effects letter to Shannon Bennett re: Alternatives R5 and RGM6)
January 20, 2015	Section 106 consultation (CDOT eligibility and effects letter to Antonia Clark re: Alternatives R5 and RGM6)
January 20, 2015	Section 106 consultation (CDOT eligibility and effects letter to Philip S. Craig re: Alternatives R5 and RGM6)
January 20, 2015	Section 106 consultation (CDOT eligibility and effects letter to Joel Craig re: Alternatives R5 and RGM6)
January 21, 2015	Eligibility and effects letter to Southern Ute Indian Tribe from CDOT re: Alternatives R5 and RGM6

**US 550 South Connection to US 160
 SUPPLEMENT to the US Highway 160 from Durango to Bayfield EIS
 RECORD OF DECISION
 Appendix B: Agency Correspondence**

INDEX

Date	Correspondence
January 21, 2015	Eligibility and effects letter to Pueblo of Laguna from CDOT re: Alternatives R5 and RGM6
January 21, 2015	Eligibility and effects letter to Hopi Tribe from CDOT re: Alternatives R5 and RGM6
January 28, 2015	Letter from Edward Nichols (SHPO) to CDOT concurring with the eligibility and effects determination and requesting that resource 5LP.9310 should be included to the APE
February 2, 2015	Eligibility and effects response letter from Hopi Tribe to CDOT re: Alternatives R5 and RGM6
February 17, 2015	Letter from Jane Hahn (CDOT) to SHPO and consulting parties transmitting revised information on eligibility and effects to historic properties
February 23, 2015	SHPO Response letter to CDOT re: eligibility and effects



U.S. Department
of Transportation
**Federal Highway
Administration**

Colorado Division

July 3, 2012

12300 W. Dakota Ave., Ste. 180
Lakewood, Colorado 80228
720-963-3000
720-963-3001

Ms. Pearl Young
US Environmental Protection Agency
Office of Federal Activities, EIS Filing Section
Ariel Rios Building (South Oval Lobby) Room 7220
1200 Pennsylvania Avenue, NW
Washington, DC 20004

Subject: US 550 Connection to US 160 Supplemental Final Environmental Impact Statement

Dear Ms. Young:

Please find enclosed four copies of the US 550 Connection to US 160 Supplemental Final Environmental Impact Statement (SFEIS). One is a hard copy and three are electronic copies on CD. FHWA is submitting the SFEIS for a Notice of Availability on July 13, 2012 per the Amended Environmental Impact Statement Filing System Guidance published in the *Federal Register* January 14, 2011. The SFEIS will also be available on the project website at <http://www.coloradodot.info/projects/us550-at-160> starting July 12, 2012.

The US 550 Connection to US 160 SFEIS has been prepared in accordance with 40 CFR 1502. Copies of the SFEIS will also be transmitted to commenting agencies and made available to the public during the week of July 9th to be in place by July 13, 2012. In addition to the four copies of the North I-25 FEIS that are filed with EPA Headquarters, a copy will be provided directly to the EPA Regional Office (Region 8) for review.

The transmittal to all agencies and anyone who provided substantive comments will be complete by July 12, 2012. This will assure that the SFEIS is received by all interested parties by the time the EPA Notice of Availability appears in the *Federal Register*. The public review period will be for 30 days starting July 13, 2012 and ending August 13, 2012.

The contact information for the official responsible for both the distribution and contents of the SFEIS is as follows:

Ms. Stephanie Gibson
Federal Highway Administration, Colorado Division
12300 West Dakota Avenue, Suite 180
Lakewood, Colorado 80228
720-963-3013

Sincerely,


for John M. Cater
Division Administrator

Enclosures: One Hard Copy SFEIS, Three on CD



U.S. Department
of Transportation
**Federal Highway
Administration**

Colorado Division

July 10, 2011

12300 W. Dakota Ave., Ste. 180
Lakewood, Colorado 80228
720-963-3000
720-963-3001

Dear Interested Party:

Please find the enclosed US 550 South Connection to US 160 Supplemental Final Environmental Impact Statement/Section 4(f) Evaluation [SFEIS/4(f) Evaluation] to the US Highway 160 from Durango to Bayfield Environmental Impact Statement.

A notice of availability for the SFEIS/4(f) Evaluation will be issued in local newspapers in addition to direct notification of all parties on the projects mailing list. The SFEIS/4(f) Evaluation will be available in the Durango area for public review at the Durango, Bayfield and Ignacio public libraries, US Forest Service/Bureau of Land Management Public Lands Center, City of Durango, La Plata County, and Colorado Department of Transportation (CDOT) North Main Office. In the Denver area the document will be available for public review at CDOT Headquarters and at the Federal Highway Administration (FHWA) Colorado Division office. In addition the document will be available for review on the project website at <http://www.coloradodot.info/projects/us550-at-160>.

The Notice of Availability for the SFEIS/4(f) Evaluation will be published in the *Federal Register* on July 20, 2012. A 30-day public availability period will commence July 20, 2012 and end August 20, 2012.

If you have any questions or comments, you can contact CDOT (Attn: Ms. Sandra Taylor) at 3803 North Main Ave., Durango, CO 81301 or FHWA, Colorado Division (Attn: Ms. Stephanie Gibson), at 12300 W. Dakota Ave., Ste. 180, Lakewood, CO 80228.

Sincerely,


for John M. Cater
Division Administrator

Enclosure:

US 550 South Connection to US 160 Supplemental Final Environmental Impact Statement/Section 4(f) Evaluation [SFEIS/4(f) Evaluation]

cc: Mr. Tony Cady, Colorado Department of Transportation, Region 5



U.S. Department
of Transportation
**Federal Highway
Administration**

Colorado Division

July 17, 2012

12300 W. Dakota Ave., Ste. 180
Lakewood, Colorado 80228
720-963-3000
720-963-3001

Dear Interested Party:

Enclosed please find corrected pages and additional pages for insertion into the US 550 South Connection to US 160 Supplemental Final Environmental Impact Statement/Section 4(f) Evaluation [SFEIS/4(f) Evaluation] that was sent to you last week. A few errors and omissions were discovered after the previous version was mailed.

A notice of availability for the SFEIS/4(f) Evaluation will still be issued in local newspapers in addition to direct notification of all parties on the projects mailing list. The SFEIS/4(f) Evaluation will be available in the Durango area for public review at the Durango, Bayfield and Ignacio public libraries, US Forest Service/Bureau of Land Management Public Lands Center, City of Durango, La Plata County, and Colorado Department of Transportation (CDOT) North Main Office. In the Denver area the document will be available for public review at CDOT Headquarters and at the Federal Highway Administration (FHWA) Colorado Division office. In addition the document will be available for review on the project website at <http://www.coloradodot.info/projects/us550-at-160>.

A revised Notice of Availability will be published in the Federal Register. Due to the errors, the public availability period for the project will be extended until August 27, 2012.

If you have questions or comments, you may direct them to Ms. Nancy Shanks of CDOT at 970-385-1428 or nancy.shanks@dot.state.co.us or at 3803 North Main Ave., Durango, CO 81301. You may also contact the FHWA, Colorado Division (Attn: Ms. Stephanie Gibson), at 12300 W. Dakota Ave., Ste. 180, Lakewood, CO 80228.

Sincerely,

John M. Cater
Division Administrator

Enclosure:

Corrected and additional pages for the US 550 South Connection to US 160 SFEIS/Section 4(f)

cc: Mr. Tony Cady, Colorado Department of Transportation, Region 5



U.S. Department
of Transportation
**Federal Highway
Administration**

Colorado Division

July 17, 2012

12300 W. Dakota Ave., Ste. 180
Lakewood, Colorado 80228
720-963-3000
720-963-3001

Dear Interested Party:

Enclosed please find a corrected version of the US 550 South Connection to US 160 Supplemental Final Environmental Impact Statement/Section 4(f) Evaluation [SFEIS/4(f) Evaluation]. A few errors and omissions were discovered after the previous version was sent to you last week.

A notice of availability for the SFEIS/4(f) Evaluation will still be issued in local newspapers in addition to direct notification of all parties on the projects mailing list. The SFEIS/4(f) Evaluation will be available in the Durango area for public review at the Durango, Bayfield and Ignacio public libraries, US Forest Service/Bureau of Land Management Public Lands Center, City of Durango, La Plata County, and Colorado Department of Transportation (CDOT) North Main Office. In the Denver area the document will be available for public review at CDOT Headquarters and at the Federal Highway Administration (FHWA) Colorado Division office. In addition the document will be available for review on the project website at <http://www.coloradodot.info/projects/us550-at-160>.

A revised Notice of Availability will be published in the Federal Register. Due to the errors, the public availability period for the project will be extended until August 27, 2012.

If you have questions or comments, you may direct them to Ms. Nancy Shanks of CDOT at 970-385-1428 or nancy.shanks@dot.state.co.us or at 3803 North Main Ave., Durango, CO 81301. You may also contact the FHWA, Colorado Division (Attn: Ms. Stephanie Gibson), at 12300 W. Dakota Ave., Ste. 180, Lakewood, CO 80228.

Sincerely,

John M. Cater
Division Administrator

Enclosure:

Corrected US 550 South Connection to US 160 SFEIS/Section 4(f)

cc: Mr. Tony Cady, Colorado Department of Transportation, Region 5



U.S. Department
of Transportation
**Federal Highway
Administration**

Colorado Division

July 18, 2012

12300 W. Dakota Ave., Ste. 180
Lakewood, Colorado 80228
720-963-3000
720-963-3001

Ms. Dawn Roberts
US Environmental Protection Agency
Office of Federal Activities, EIS Filing Section
Ariel Rios Building (South Oval Lobby)
Room 7220
1200 Pennsylvania Avenue, NW
Washington, DC 20004

**Subject: US 550 Connection to US 160 Supplemental Final Environmental Impact Statement,
request for revised Notice of Availability**

Dear Ms. Roberts:

Please find enclosed four copies of the corrected US 550 Connection to US 160 Supplemental Final Environmental Impact Statement (SFEIS). Some errors and omissions were discovered after publication of the SFEIS, requiring this corrected copy be produced. One copy is a hard copy and three are electronic copies on CD. We believe that the original Notice of Availability will be published in the *Federal Register* July 20, 2012.

FHWA is submitting the corrected SFEIS for a revised Notice of Availability on July 27, 2012. The public availability period would now end on August 27, 2012 rather than on August 20, 2012.

The corrected copies of the document have been mailed to all of the previous recipients, and have been placed in the public viewing locations. The change in the availability period has been publicized by mail announcements, the project website, and a news release. The corrected SFEIS is also available on the project website at <http://www.coloradodot.info/projects/us550-at-160>.

The contact information for the official responsible for both the distribution and contents of the SFEIS is as follows:

Stephanie Gibson
Federal Highway Administration, Colorado Division
12300 West Dakota Avenue, Suite 180
Lakewood, Colorado 80228
720-963-3013

Sincerely,

John M. Cater
Division Administrator

Enclosures: One Hard Copy SFEIS, Three on CD

July 27, 2012

John M. Cater
Division Administrator
U.S. Dept. of Transportation
Colorado Division - FHWA
12300 W. Dakota Avenue, Ste. 180
Lakewood, CO 80228

Re: Memorandum of Agreement, US 550 Connection to US 160 at Farmington Hill
La Plata County, Colorado

Dear Mr. Cater:

We have received your letter dated July 9, 2012, enclosing the “final Memorandum of Understanding” (MOU) and inviting our clients to sign the document.

We also have received your letter dated July 10, 2012, enclosing a copy of the Supplemental Final Environmental Impact Statement/Section 4(f) (SFEIS), indicating that a notice of availability would be published in the *Federal Register* on July 20 and that a “public availability period” would commence on that date and conclude on August 20.¹ By your letter dated July 16, 2012, FHWA has extended the availability period through August 27, 2012.

Under the National Environmental Protection Act of 1969 (NEPA), 42 U.S.C. § 4321, *et seq.*, upon issuance of Final EIS (or Supplemental Final EIS), the agency must wait thirty days before making a decision. *See*, 40 CFR 1506.10(b)(2). *See also*, <http://www.epa.gov/oecaerth/nepa/eisdata.html>. We note that under 40 CFR 1503.1(b) FHWA did not request further comments. However, under that same regulatory section the public is entitled to submit further comments and the owners of Webb Ranch intend to do so. In its July 23, 2012 press release, CDOT advised: “Although there will be no formal response to comments made on the SFEIS, all comments will be *considered* during preparation of the ROD.” (emphasis added).² This violates FHWA’s policy that it “will *address* any new and substantive comments submitted during the 30 days following the FEIS publication.” *See*, <http://www.fhwa.dot.gov/hep/section6002/2.htm> @ p. 2 (emphasis added). We trust that FHWA will adhere to its policies and require that CDOT do so.

¹ We note that your July 9, 2012 letter indicated the SFEIS “will be made available later this summer,” which you then sent to us the next day.

² <http://www.coloradodot.info/news/2012-news-releases/07-2012/cdot-federal-highway-administration-announce-preferred-alternative-for-a-us-550-at-us-160-connection-in-grandview>.

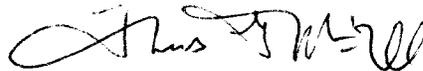
John M. Cater
July 27, 2012
Page 2

Based upon the foregoing, it is premature for FHWA to seek execution of the MOU because FHWA legally is precluded from making a decision until August 28, 2012.

If FHWA renders a decision to adopt the SFEIS as presently constituted – selecting the Revised G Modified Alternative as FHWA’s preferred alternative, rejecting the “No Action” alternative and rejecting without further study or development the four variations of the R Alternative -- our client will then decline to execute the MOU. In that instance, it would be our client’s position that FHWA will have violated Section 4(f) of the Department of Transportation Act, 49 U.S.C. § 303(c), and the regulations promulgated thereunder, and will have acted arbitrarily and capriciously with respect to all applicable federal statutes. On behalf of our client, we hereby reserve all rights and remedies, whether stated herein or otherwise, as to FHWA, CDOT, the Departments of Transportation and Interior and any federal or state agency that has made, or will make, a decision or determination in this matter.

We request that FHWA include this letter in the administrative record.

Very truly yours,



Thomas G. McNeill

TGM:lm

cc: Daniel Gregory, Esq.
Lawrence P. Hanf, Esq.
Kerrie Neet
Daniel Jepsen
Anthony Cady
Stephanie Gibson
Carol Legard
Edward Nichols
Mary Jane Hood
Amy Pallante

DETROIT 47919-2 1253385v2



U.S. Department
of Transportation
**Federal Highway
Administration**

Colorado Division

August 1, 2012

12300 W. Dakota Ave., Suite 180
Lakewood, Colorado 80228
720-963-3000
720-963-3001

Mr. Thomas G. McNeill
Dickinson Wright PLLC
500 Woodward Avenue, Suite 4000
Detroit, MI 48226-3425

**Subject: Webb Comments Concerning the US 550 South Connection to US 160 Project,
La Plata County, Colorado**

Dear Mr. McNeill:

We have received your letter dated July 27, 2012, regarding the environmental process for the US 550 South Connection to US 160 project. In accordance with Federal Highway Administration (FHWA) policy, all comments received on the Supplemental Final Environmental Impact Statement (SFEIS) will be considered, and all new and substantive comments will be addressed in the Record of Decision (ROD) for the project.

The execution of a Memorandum of Agreement (MOA) to resolve adverse effects under Section 106 of the National Historic Preservation Act is not a separate agency decision; it is part of the consultation process under 36 CFR § 800.6 and outlines the required mitigation should a particular alternative be implemented. The identification of such mitigation measures is critical to the decision-making process, and should be completed before a decision can be made on a project; therefore a MOA resolving the adverse effects to historic sites is generally required before a ROD can be issued. This is standard practice throughout the FHWA.

In addition, FHWA regulations require Section 4(f) approval before completion of the ROD (23 CFR § 774.9). For the Section 4(f) approval, the project must include all possible planning to minimize harm (23 CFR § 774.3(a)(2)); the MOA developed as part of the Section 106 process is used to meet this Section 4(f) requirement.

If FHWA determines that any comments received on the SFEIS require a change in the Section 106 or Section 4(f) processes, those changes, including any required changes to the MOA, will be undertaken before a ROD is completed. Also, if an alternative other than the one described during the development of the MOA (i.e., other than Revised G Modified Alternative) were to be the selected alternative, FHWA would terminate the MOA. If the selected alternative were an alternative other than the No Action Alternative, a new MOA would be developed and executed for the selected alternative.

If you have additional questions or comments on the project, please feel free to contact our office.

Sincerely yours,

John M. Cater
Division Administrator

cc: Ms. Kerrie Neet, Region 5 CDOT
Mr. Lawrence (Lance) P. Hanf, Assistant Chief Counsel, FHWA



U.S. Department
of Transportation
**Federal Highway
Administration**

Colorado Division

August 5, 2014

12300 W. Dakota Ave., Ste. 180
Lakewood, Colorado 80228
720-963-3000

Kerrie Neet
Regional Transportation Director
Colorado Department of Transportation, Region 5
3803 N. Main Ave.
Durango, CO 81301

Subject: US 550 South Connection to US 160 Project, Alternative R5

Dear Ms. Neet:

Following the Supplemental Final Environmental Impact Statement (SFEIS) published in July 2012, FHWA and CDOT received a comment from the Dickinson Wright Law Firm proposing a new alternative, R5, be considered. Since that time, CDOT contracted an independent firm to analyze alternative R5 in terms of the purpose and need for the project, engineering challenges, and environmental effects.

FHWA reviewed the results of that analysis and has concluded that alternative R5 is not a reasonable alternative under NEPA requiring further advancement and evaluation pursuant to 23 CFR 771.123(c) due to multiple safety, maintenance, operational, construction cost, environmental, and community impact factors in addition to the unique risks associated with building the new alignment while maintaining traffic on US 550 in this extremely challenging topographic environment. In addition, alternative R5 is not a prudent alternative under Section 4(f) using the totality of factors provided in 23 CFR 774.17(3)(iv). More detail about these conclusions is included in the attached document.

Because alternative R5 is not reasonable under NEPA or prudent under Section 4(f) it does not need to be fully analyzed in the Environmental Impact Statement. It is FHWA's recommendation that CDOT conduct a reevaluation of the SFEIS to address any revisions to the proposed alternative or changes in the environment so that FHWA can proceed to a Record of Decision for this project.

Sincerely,

John M. Cater, P.E.
Division Administrator

Cc: Stephanie Gibson, FHWA Environmental Program Manager
Tony Cady, CDOT Region 5 Regional Planning and Environmental Manager
Vanessa Henderson, CDOT Environmental Policy & Biological Resources Section Manager

US 550 South Connection to US 160
Should Alternative R5 be Carried Forward?:
Reasonableness under NEPA and
Prudence under Section 4(f)

FHWA, Colorado Division
August 2014

Following the Supplemental Final Environmental Impact Statement (SFEIS) published in July 2012, FHWA and CDOT received a comment from the Dickinson Wright law firm proposing a new alternative, R5, be considered. Since that time, CDOT contracted an independent firm to analyze alternative R5 in terms of the purpose and need for the project, engineering challenges, and environmental effects. The analysis below is based on the results from that study.

Case law, 23 CFR 771.105(b) and the CEQ regulations at 40 CFR 1502.14 all require FHWA to evaluate "reasonable alternatives" to its proposed project action. This is even true to a lesser intent when preparing an environmental assessment. The threshold question in many instances is what factors make an alternative unreasonable. The first criterion is whether the project substantially meets the purpose and need. If not, the alternative is not a reasonable alternative under NEPA and is not a prudent alternative under Section 4(f). If an alternative substantially meets the project's purpose and need, but has other problems or impacts, this too can eliminate it as unreasonable but this is more of a factual test and can be a totality test if there is more than one reason. For example, if an alternative exceeds the cost metrics and has serious impacts to important wetlands, one of those factors might not be enough to make the alternative unreasonable and/or imprudent, but together these impacts make this alternative unreasonable and/or imprudent.

In evaluating alternative R5, it appears there are a multitude of compromising factors that, when taken together, make the alternative unreasonable under NEPA and imprudent under Section 4(f).

This analysis is similar to the systematic totality evaluation that is done pursuant to FHWA Section 4(f) regulations when considering whether an alternative that avoids Section 4(f) properties is prudent under 23 CFR 771.17(3)(vi).

In 23 CFR 774.17 provides the definition of a "feasible and prudent avoidance alternative. It reads:

Feasible and prudent avoidance alternative. (1) A feasible and prudent avoidance alternative avoids using Section 4(f) property and does not cause other severe problems of a magnitude that substantially outweighs the importance of protecting the Section 4(f) property. In assessing the importance of protecting the Section 4(f) property, it is appropriate to consider the relative value of the resource to the preservation purpose of the statute.

(2) An alternative is not feasible if it cannot be built as a matter of sound engineering judgment.

(3) An alternative is not prudent if:

(i) It compromises the project to a degree that it is unreasonable to proceed with the project in light of its stated purpose and need;

(ii) It results in unacceptable safety or operational problems;

(iii) After reasonable mitigation, it still causes:

(A) Severe social, economic, or environmental impacts;

(B) Severe disruption to established communities;

(C) Severe disproportionate impacts to minority or low income populations; or

(D) Severe impacts to environmental resources protected under other Federal statutes;

- (iv) It results in additional construction, maintenance, or operational costs of an extraordinary magnitude;*
- (v) It causes other unique problems or unusual factors; or*
- (vi) It involves multiple factors in paragraphs (3)(i) through (3)(v) of this definition, that while individually minor, cumulatively cause unique problems or impacts of extraordinary magnitude.*

Alternative R5 is a derivation of the R set of alternatives described in Section 5.7.3.4 of the Section 4(f) Evaluation contained in the US 550 South Connection to US 160 Supplemental Final EIS/Section 4(f) Evaluation (COOT, 2012). As noted in Section 5.7.3.4, the Alternative R variations were not prudent because they could not achieve acceptable design speeds to meet safety requirements and have unique and challenging geotechnical issues with springs and unstable slopes. Alternative R5 has been further developed to address the unacceptable design speeds which were a major problem with Alternative variations R1 to R4. It has also been further developed to include an interchange at US 160 that meets design standards.

Alternative R5 has a number of challenges as discussed below making it an unreasonable NEPA alternative and an imprudent Section 4(f) avoidance alternative.

Using the test of 23 CFR 774.17(3)(i), alternative R5 compromises the project to a degree that it is unreasonable to proceed with the project in light of its stated purpose and need as its safety elements of purpose and need are to a lesser extent than the other feasible and prudent alternatives still under consideration. The new US 550 alignment along the face of Florida Mesa precludes providing any grade separated large animal wildlife crossings due to the very steep topography. (Existing crash statistics indicate that wild animal crashes make up 36% of the crash totals along US 550 – by far the largest percentage. The next largest percentage is 17% for overturning.) The means that animals will still need to cross US 550 to travel between the top of the mesa and the Animas River or Wilson Gulch.

Other safety problems with Alternative R5 are:

- The eastbound off-ramp at the new US 550/US 160 interchange is steep (at 6.33%) and difficult to climb in icy conditions.
- Another interchange ramp at US 550/US 160 has a sharp curve with a low design speed. This curve is on a bridge, so will be very susceptible to icing.
- The US 550 mainline has a sharp curve and a bridge immediately before a traffic signal. The curve makes it difficult to see the signal. The bridge could also become icy, making it difficult to stop at the signal.

Using the test of 23 CFR 774.17(3)(ii), in addition to the safety issues identified above, Alternative R5 has other maintenance and operational issues. Its location, cut into the side of the Farmington Hill hillside, running along the -north-facing slope, results in less direct sunlight so it is prone to icing. In order to fit an upgraded road into the hillside, extensive cut and fill and significant retaining walls are required along both sides of US 550. The retaining walls are as high as 90 feet (9 stories tall) in some locations, nearing the limit of the technology. The tall retaining walls require extensive subsurface drainage systems to allow drainage from the ephemeral seeps and springs in the hillside. The steep hillside above US 550 is composed of decomposed shale overlain by sandy cobbles and boulders which are prone to falling onto the roadway surface or creating erosion problems. All of these issues combine to present substantial ongoing maintenance and operational challenges.

Using the test of 23 CFR 774.17(3)(iii)(A) and (D), alternative R5 has three times the wetland impact of Revised G Modified 6: 1.29 acres of wetland impact compared to 0.42 acre with Revised G Modified 6.

The wetlands that are impacted are high functioning wetlands providing fish habitat and valuable riparian habitat, compared to the low quality wetlands impacted by Revised G Modified 6. Moreover, alternative R5 results in 0.18 acre of impact to Southwestern willow flycatcher nesting habitat. The Southwestern willow flycatcher is an endangered species. Alternative R5 also results in 0.25 acres of impact to the New Mexico meadow jumping mouse habitat, a proposed endangered species. Alternative RGM6 has no impact to habitat for either of these species and no endangered species impact at all.

Using the test of 23 CFR 774.17(3)(iii)(B) alternative R5 also results in acquisition, demolition and relocation of three residences and one business in the Eagle Block community. This acquisition encompasses this entire developed area, including the developable portion of the Piccoli property on top of the mesa. Alternative RGM6 requires no relocations.

While not a factor for the test in 23 CFR 774.17 for Section 4(f), cost is relevant in the NEPA context and alternative R5 is the most costly of the alternatives considered. Its cost is estimated at over \$184 million compared to approximately \$91 million for RGM6, \$78.4 million for Revised F Modified and \$92.8 million for the Eastern Realignment Alternative. Much of the additional cost is associated with retaining walls, bridges, and excavation. Alternative R5 includes extensive retaining walls and three bridges for the on and off ramps at US 160/US 550. There is a large amount of excavation and fill associated with alignment cuts through Florida Mesa, where there is an elevation change of approximately 200 feet from the top of the mesa to the alignment near US 160. (This compares to an elevation drop of approximately 90 feet for RGM6.) Region 5 has averaged approximately \$40 million per year for construction over the last several years, so the additional cost represents several years of their construction budget, over and above the already large cost of other options.

Using the test of 23 CFR 774.17(3)(v), the topography in the project area is extremely difficult. US 550 starts on top of a mesa, and must descend to meet US 160 at the bottom of the mesa. In addition, the current US 550/US 160 intersection location is at a narrow area between two mesas, and Wilson Gulch (a creek) runs through that location as well. The R5 alignment follows the existing US 550 alignment but has a substantially different vertical profile. This makes building the roadway while maintaining traffic on existing US 550 very difficult, expensive and risky. A complex construction phasing plan includes four different phases, each presenting unique challenges, including safety concerns. Constructing the new roadway on a steep slope with erodible soils and drainage and slope stability problems while maintaining traffic on the very narrow existing road is technically quite difficult. Because the work is split into four phases spanning several construction seasons, multiple mobilizations of specialized equipment would be needed, adding to the cost of the project. It will also lead to much larger impacts to the travelling public and economic effects to local businesses. There are multiple risks and unique challenges associated with this construction phasing plan.

In conclusion, alternative R5 is not a reasonable alternative under NEPA requiring further advancement and evaluation pursuant to 23 CFR 771.123(c) because of these multiple safety, maintenance, operational, construction cost, environmental and community impact factors in addition to the unique risks associated with building the new alignment while maintaining traffic on US 550 in this extremely challenging topographic environment nor is R5 a prudent alternative under Section 4(f) using the totality of factors provided in 23 CFR 774.17(3)(iv).



PUEBLO OF LAGUNA

P.O. BOX 194

LAGUNA, NEW MEXICO 87026



(505) 552-6598
(505) 552-6654
(505) 552-6655

Office of:

The Governor
The Secretary
The Treasurer

August 14, 2012

Ms. Nancy Shanks
Federal Highway Administration
Colorado Division
3803 North Main Avenue
Durango, Colorado 81301

Dear Ms. Shanks:

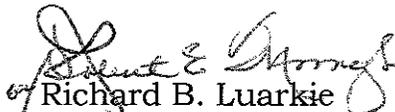
Re: Corrected US 550 South Connection to US 160 SFEIS/Section 4(f)

The Pueblo of Laguna appreciates your consideration to comment on the possible interest your project may have on any traditional or cultural properties.

The Pueblo of Laguna has determined that the undertaking WILL NOT have a significant impact at this time. However, in the event that any new archaeological sites are discovered and any new artifacts are removed, we request to be notified to review items. We also request photographs of items. According to unpublished migration history, our ancestors journeyed from the north through that area and settled for periods of time before traveling to our present location. Therefore, the possibilities of more findings may exist.

We thank you and your staff for the information provided.

Sincerely,


Richard B. Luarkie
Governor
Pueblo of Laguna



COLORADO

Department of Transportation

Region 5

Environmental and Planning
3803 N. Main Avenue
Durango, CO 81301

October 24, 2014

Kara Hellige
US Army Corps of Engineers
Durango Regulatory Field Office
Sacramento District
1970 E. 3rd Ave, Suite 109
Durango, Colorado 81301

Dear Ms. Hellige:

Thank you for your September 29 email regarding the US 550 South Connection to US 160 project, which replied to our September 22, 2014 letter to your office. For clarification, we have checked with the Federal Highway Administration regarding distribution of the Supplemental Final EIS. It appears that both a hard copy and a CD copy of the 2012 final document was sent to you on July 18, 2012. Please let us know if for some reason you need another copy.

To incorporate the information developing during the US 550 South Connection to US 160 Independent Alternatives Analysis (AMEC, 2014), CDOT and FHWA are conducting a reevaluation of the Supplemental Final EIS pursuant to 23 CFR 771.129. CDOT and FHWA are also preparing a Revised Section 4(f) Evaluation. Both of these documents incorporate a refinement to the Preferred Alternative discussed in the 2012 SFEIS. The refined Preferred Alternative is referred to as Revised G Modified 6 or RGM6. Because the new information or new circumstances relative to this design refinement do not result in a new significant impact not discussed in the SFEIS, a revised Supplemental FEIS is not needed.

Per your request, we have attached Chapter 7 of the 2014 Independent Alternatives Analysis so you can see the work that was conducted in developing and analyzing new alternatives. As we explained to you in our September 22 letter, this work included a compilation and evaluation of previously conducted wetland work, and new wetland delineations and new impact analysis for wetlands.

Aquatic Resources

Wetlands and other Waters of the United States (WOUS, as defined under the Clean Water Act [CWA]) within much of the study area were delineated in 1999 and 2000. The United States Army Corps of Engineers (USACE) concurred with this delineation in 2002, subject to final verification as specific projects are designed for construction, and it was cited by both the 2006 *US 160 EIS* and the 2012 *SFEIS*.

In 2013, SME Environmental (SME) assessed the 1999–2000 delineation in the field using global position system (GPS) technology; at the same time, SME also conducted a study of wetlands and other WOUS within the CR 220 corridor outside of the previous delineation study area.

Discrepancies Between 1999-2000 and 2013-2014 Data

A number of minor changes become apparent when comparing the wetland data gathered during the 2013-2014 survey effort and the original 1999-2000 delineations. These changes are due to:

- The introduction of *Rapanos* Guidance, which identifies a more robust analysis for evaluating potential jurisdictional status of wetlands and other WOUS (see below)
- Changes in irrigation patterns of the streams and ditches within and adjacent to the study area over the past 13 years
- The absence of mapping of ditches and open waters in the 1999–2000 delineation*
- Changes in wildlife behavior, including beaver activity (e.g., dams, lodges)
- Improved location technology (the 2000 survey did not incorporate GPS technology)
- Better access to portions of the study area during the 2013–2014 study

*It was discovered that the original delineation neglected to include acreages for ditches and open water sources within the study area. All new wetland delineation work does include these acreages

The maps provided in the Methodology and Results of Wetland Delineation, prepared by SME (December 2013, revised July 2014), denotes the current boundaries of wetlands and other WOUS within the study area. As noted above, a majority of 1999–2000 boundaries have been revised. New identification numbers were established for each potential wetland and other WOUS identified in the 2013-2014 delineation. In preparing the referenced document, information from both the 1999–2000 and 2013 surveys, as well as 2014 aerial interpretation, were used to identify potential wetlands and other WOUS. The jurisdictional status of each identified aquatic resource was not denoted in the referenced report. Note that in preparation of the 2014 delineation report, SME conducted the necessary field work to document existing conditions where previous data and aerial interpretation was used for the July 2014 memorandum.

Jurisdictional Status of Aquatic Resources

In response to your email dated September 22, 2014, the table of wetlands and other WOUS located within the study area was revised to include notes/observations, location, Rapanos rationale and SME's professional opinion on whether or not these resources would be jurisdictional under the CWA.

The study area includes Wilson Gulch, which is a naturally occurring perennial tributary to the Animas River. Although the closest downstream officially designated navigable waterway (regulated under Section 10 of the Rivers and Harbors Act) is Lake Powell in Utah, based on our conversations with Ms. Kara Hellige, Chief of the Sacramento District's Durango Office, it is our understanding that the USACE considers the Animas River to meet the criteria of a Traditionally Navigable Waterway (TNW). Wilson Gulch, as a perennial tributary, meets the criteria of a Relatively Permanent Waterway (RPW) and is a WOUS.

The term RPW is taken from the USACE Jurisdictional Determination Form Instructional Guidebook ("Guidebook" 2007) and implies a tributary whose flow is year-round or seasonally continuous and whose discharge directly or indirectly enters a Traditional Navigable Water (TNW). RPWs would be typically characterized as perennial and intermittent drainages. It is our opinion that the Animas River would be considered a TNW due to the presence of commercial rafting and fishing operations on the River (i.e., potential to affect interstate commerce), and would be regulated under the CWA. As a result of this nexus to a TNW, the above described RPWs would be regulated under the CWA. Further, wetlands adjacent to WOUS (such as the wetlands described above) are themselves considered WOUS and are, therefore, jurisdictional under the CWA per 33 CFR 328.3(a)(7).

The study area also includes an intermittent tributary to Wilson Gulch, which based on our field investigations, are anticipated to flow at least "seasonally"; thereby also meeting the criteria to be classified as RPWs. Per the *Rapanos Guidance*, all wetlands directly abutting these RPWs were considered jurisdictional.

Additionally, ephemeral tributaries to Wilson Gulch and the Animas River are located within the study area. The jurisdictional status of these streams would be determined by the USACE through a determination of significant nexus to a TNW. They would have a significant nexus if they are determined by USACE to significantly affect the chemical, physical, and biological integrity of a downstream TNW. Examples listed by the *Rapanos Guidance* include the ability to transport pollutants (chemical), floodwaters (physical), and/or organic carbon/nutrients (biological) to TNWs. Due to the direct surface connection to downstream receiving waters, as well as their proximity to the Animas River, these streams likely maintain a significant nexus to a downstream TNW. One of the tributaries is impounded at numerous locations. Per the USACE's *Jurisdictional*

Determination Form Instructional Guidebook (2007), impoundments generally do not affect the jurisdictional status of a waterway. Therefore, these impoundments may be considered WOUS.

The primary source of hydrology in agricultural portions of the study area (including the County Road 220 corridor) is irrigation water derived from the Florida River, and transported by a series of ditches. The *Rapanos Guidance* states that USACE generally does not assert jurisdiction over ditches (including roadside ditches) or wetlands associated with these ditches provided they are “excavated wholly in and draining only uplands and that do not carry a relatively permanent flow of water.” The connection of ditches to RPWs and ultimately the Animas River, and whether irrigation controlled flows are considered “relatively permanent” would factor into the determination of whether the USACE asserts jurisdiction over the irrigation ditches, ponds, and associated wetlands. Several ditches and ponds with associated wetlands on the Webb and Piccoli properties exhibit properties of “**not relatively permanent**” flows that at times discharge to a **not relatively permanent** drainage feature that is tributary to the Animas River. For these features, CDOT will request that the USACE perform a significant nexus analysis when deciding whether or not to assert jurisdiction over these ditches, ponds, and associated wetlands. All wetlands directly abutting ditches that meet the criteria of RPWs were considered WOUS. Wetlands that were adjacent but not directly abutting RPWs were considered jurisdictional due to a likely significant nexus. Such wetlands were connected to RPWs via upland swales, culverts, etc. that would provide a direct surface connection to RPWs during storm events. Wetlands that were neither adjacent to nor abutting RPWs (e.g., isolated depressions) were not considered WOUS.

Revised Table 7-1 provides information specific to each aquatic resource identified within the study area and its likely jurisdictional status in regard to Section 404 of the CWA. Aquatic resources labeled 39-9, 39-10 and 40-2 (2013 ID) are not likely jurisdictional (subject to USACE verification).

Functional Assessment

Following the field delineation, each area was assigned a functional type by SME, based on the process used in the *2006 US 160 EIS* ([Table 7-1 of the Independent Alternatives Analysis and revised Table 7-1 included with this letter](#)). Each wetland type is described in Section 3.7.1 of the *2006 US 160 EIS*. Additionally, specific wetland functions and values (including threatened and endangered species habitat, general wildlife habitat, general fish habitat, sediment and nutrient retention, production export/food chain support, groundwater recharge/discharge, and uniqueness) were assessed using the same methods as the *2006 US 160 EIS* and *2012 SFEIS*, which is based on *Montana Department of Transportation Wetland Field Evaluation Methods* (Montana Department of Transportation, 1996). For comparison with the *2006 US 160 EIS* and *2012 SFEIS*, SME used the previous evaluation method in-lieu of the Colorado Functional

Wetland Assessment (FACWet) that is currently utilized by the USACE Sacramento District for projects in Colorado.

As outlined in Section 7.4.4 of the Independent Alternatives Analysis, the *2006 US 160 EIS* includes a rating of each of the wetlands delineated in 1999–2000, based on the *Montana Department of Transportation Wetland Field Evaluation Methods* (MDOT, 1996). The ratings can be found in the *2006 US 160 EIS* Appendix C, Table C-3. The *2012 SFEIS* reiterated the functional type for each wetland identified in the *2006 US 160 EIS* (*2012 SFEIS*, Table 3-4). The structure and format of Table 3-4 in the *2012 SFEIS* is not appropriate for the current study area because it assigned all wetlands and other WOUS of the same functional type identical functions and values. This was not the case for the 2013 evaluation. For example, although the segments of Wilson Gulch above and below US 160 were assigned the same functional type (SF-3), they do not provide identical values. Specifically, the segment downstream of US 160 is adjacent to the larger Animas River riparian corridor, and as such provides better wildlife habitat. Therefore, information presented in Section 7.4.4 of the Independent Alternatives Analysis follows the *2006 US 160 EIS* format regarding evaluation of functions and values of the potential wetlands within the study area.

Changes to Impact Calculations Based on Data Set

The absence of mapping of ditches and open waters in the 1999–2000 delineation, as noted above, may also carry over to the impact calculations for each of the alternatives as demonstrated in Table 1 below. Revised G Modified as presented in the SFEIS was designed to about 25 percent. The first column in the table below outlines the impacts analyzed in the SFEIS which used the 1999/2000 data set. As previously discussed, irrigation ditches and some aquatic resources were not accounted for in the 1999/2000 survey. The calculation of impacts presented in the second column of the table below uses the boundaries of streams, ditches and ponds mapped during the 2013/2014 survey to adjust the 1999/2000 data set. Several of the wetland areas increased in size since the original survey, as can be seen using the 2013/2014 data. Comparing the 1999/2000 data (first column of impacts calculations) to the 2013/2014 data without streams, ponds and ditches (third column), this increase in wetlands is apparent. The last column of impact calculations is derived from the complete set of 2013/2014 data (refined boundaries of wetland and other WOUS) and is reflective of how the Revised G Modified (SFEIS) alignment impacts wetlands and other WOUS under existing conditions. This data is presented to set the foundation for an apples-to-apples comparison with the alignments evaluated in the 2014 Independent Alternatives Analysis prepared by AMEC.

Table1: Revised G Modified (SFEIS) Alternative Impacts to Potential Wetlands/Other WOUS

1999/2000 ID	2013 ID	1999/2000 Data <u>Acres</u>	1999/2000 with Additional Streams, Ponds & Ditches Estimated based on 2013/2014 Data		2013/2014 (w/o streams, ponds & ditches) <u>Acres</u>	2013/2014 Complete Data	
			<u>Acres</u>	<u>Linear Feet</u>		<u>Acres</u>	<u>LF</u>
1b-9a ¹	39-1	<0.01	0.02	354	0.00	0.02	354
*	39-1a	N/A	0.01	229	0.00	0.01	229
1c-3a	*	0.01	0.01	N/A	N/A	N/A	N/A
1c-3b	39-11	0.00	0.03	N/A	0.01	0.01	N/A
2c-1 ¹	40-3	0.02	0.00	N/A	0.11	0.11	N/A
*	40-4	0.00	0.02	N/A	0.00	0.02	N/A
*	40-5	N/A	N/A	N/A	0.02	0.02	N/A
Total		0.03	0.09	583	0.14	0.19	583

*Water resources not delineated/identified in data set noted

¹Determined non-jurisdictional in 1999-2000 but identified as potentially jurisdictional during the 2013 delineation

- Revised G Modified (SFEIS): The 1999/2000 data impact acreages and aquatic resources are from the SFEIS. Impact calculations (acreages and linear footages) identified in remaining columns are derived from SME evaluation of impact areas based on design information provided by CDOT/AMEC.
- Revised G Modified (SFEIS): The 1999/2000 data does not include the limits of two irrigation ditches mapped during the 2013/2014 field survey (39-1 and 39-1a). These resources were not likely included during the 1999/2000 field survey because the U.S. Army Corps of Engineers did not identify these types of aquatic resources as jurisdictional under the Clean Water Act prior to 2007 when the Rapanos Guidance was established. Note that the fringe wetlands along 39-1 were mapped as 1b-9a in 1999/2000 along approximately 70 linear feet of this irrigation ditch. As noted above, this accounts for approximately 583 linear feet of impact to an irrigation feature that may potentially be considered a Relatively Permanent Waterway (RPW).
- Revised G Modified (SFEIS): The main increase in acreage; however, is due to two aquatic resources that were not previously identified (40-4, a vegetated stockpond; and 40-5, a PEM/PSS wetland) as well as the increase in previously identified area 2c-1 (40-3, a PEM/PSS wetland). The jurisdictional status of the stockpond and 2c-1 wetland is subject to Corps verification of a significant nexus.

Presented below are impact tables from the 2014 Independent Alternatives Analysis prepared by AMEC. In the 2014 analysis alignments R5, RGM6 and RGM were developed to 30 percent

design to more accurately define impacts, fully understand constructability issues and to form a basis for realistic cost estimates.

Alignment R5 was developed in response to a comment from the community. It is not a reasonable alignment as determined during the NEPA process and is not practicable under Section 404 because it has logistical issues associated with building a new alignment on the same topographically constrained alignment as the existing highway and the need for a 90 foot tall retaining wall on an erodible slope. It has been provided here because it is a new alignment which has not been discussed with you and because new wetland delineations were conducted along Wilson Gulch to support the evaluation of this alternative.

Alignment RGM6 is a refinement of the Revised G Modified (SFEIS) alignment. The 2014 analysis uses updated design data including geotechnical analysis that helped determine cut/fill slopes and wall parameters. Therefore, RGM will have slightly different impacts than the Revised G Modified (SFEIS) alignment based on more refined design.

Table2: R5 Alternative Impacts to Potential Wetlands/Other WOUS

1999-2000 ID	2013 ID	1999–2000 ID Permanent Impacts*		2013 ID Permanent Impacts*	
		Impacts (Acres)	Impacts (Linear Feet)	Impacts (Acres)	Impacts (Linear Feet)
1b-3, 1b-5	37-2	0.02	N/A	0.01	96
1b-6, 1b-7	38-1	0.02	N/A	0.14	N/A
1b-8	38-2	0.26	N/A	0.54	N/A
	38-2a		N/A	0.03	276
**	38-3	N/A	N/A	0.08	N/A
2c-2 ¹	39-10 ¹	< 0.01	N/A	0.01	N/A
**	39-12	N/A	N/A	0.02	144
1b-2, 1b-1, 1a-1, 1a-3	44-1	0.08	N/A	0.08	N/A
	44-1a	0.01	N/A	0.01	127
2c-1 ²	40-3	0.02	N/A	0.11	N/A
**	40-4	N/A	N/A	0.01	N/A
**	40-5	N/A	N/A	0.19	N/A
Total		0.41	N/A	1.23	643

*Total 2013 wetland impacts differ from the 1999–2000 impacts; see section 7.4.3

**Water resources not delineated/identified in 1999–2000

¹Identified as non-jurisdictional but mitigated under CDOT’s Wetland Program guidelines

²Determined non-jurisdictional in 1999–2000 but identified as potentially jurisdictional during the 2013 delineation

- R5: With the 2013/2014 data set, R5 results in 1.23 acre total impact to wetlands and other Waters of the US – broken down as 0.07 acre stream-ditch/643 linear feet; 0.09 acre pond; 1.06 acre wetland; and 0.01 acre roadside ditch (that meets the three parameters to be wetland but has no connection to other Waters; not likely to be JD under the CWA).

- R5: The 1999/2000 data includes a center line for Wilson Gulch within 1b-8 and 1a-1/1a-3; however, the impact calculation does not include linear footages for this resource. The 1999/2000 data also includes a portion of Gulch B (37-2); however, the impact calculation does not include linear footages for this resource. The bulk of impacts resulting from this alignment occur within this area.
- R5: The 1999/2000 data does not include the limits of two resources mapped during the 2013/2014 field survey (38-3 and 39-12). Feature 39-12, an ephemeral channel behind Eagle Block, is a resource type the U.S. Army Corps of Engineers did not likely identify as jurisdictional under the Clean Water Act prior to 2007 when the Rapanos Guidance was established. Feature 38-3 is a hillside wetland seep.
- R5: There was also a substantial increase in acreage due to two aquatic resources that were not previously identified (40-4, a vegetated stockpond; and 40-5, a PEM/PSS wetland) as well as the increase in previously identified area 2c-1 (40-3, a PEM/PSS wetland).

Table3: RGM Alternative Impacts to Potential Wetlands/Other WOUS

1999-2000 ID	2013 ID	1999-2000 ID Permanent Impacts*		2013 ID Permanent Impacts*	
		Impacts (Acres)	Impacts (Linear Feet)	Impacts (Acres)	Impacts (Linear Feet)
1b-9a ²	39-1	<0.01	N/A	0.02	N/A
	39-1c	0.00	N/A	0.01	476
**	39-1a	N/A	N/A	0.02	321
1c-1 ²	39-8	<0.01	N/A	<0.01	N/A
1c-3a	**	0.01	N/A	N/A	N/A
1c-3b	39-11	0.01	N/A	<0.01	N/A
2c-1	40-3	0.02	N/A	0.11	N/A
2c-2 ¹	39-10 ¹	0.01	N/A	0.01	N/A
**	40-4	N/A	N/A	0.04	N/A
**	40-5	N/A	N/A	0.19	N/A
Total		0.05	N/A	0.40	797

*Total 2013 wetland impacts differ from the 1999–2000 impacts; see section 7.4.3

**Water resources not delineated/identified in data set noted

¹Identified as non-jurisdictional but mitigated under CDOT's Wetland Program guidelines

² Determined non-jurisdictional in 1999-2000 but identified as potentially jurisdictional during the 2013 delineation

- RGM: With the 2013/2014 data set RGM, results in 0.40 acre total impact to wetlands and other Waters of the US – broken down as 0.03 acre ditch/797 linear feet; 0.04 acre pond; 0.32 acre wetland; and 0.01 acre roadside ditch (that meets the three parameters to be wetland but has no connection to other Waters; not likely to be JD under the CWA).
- RGM: The 1999/2000 data does not include the limits of two irrigation ditches mapped during the 2013/2014 field survey (39-1 and 39-1a). These resources were not likely included during the 1999/2000 field survey because the U.S. Army Corps of Engineers did not identify these types of aquatic resources as jurisdictional under the Clean Water Act

prior to 2007 when the Rapanos Guidance was established. Note that the fringe wetlands along 39-1 were mapped as 1b-9a in 1999/2000 along approximately 70 linear feet of this irrigation ditch. As noted above, this accounts for approximately 797 linear feet of impact to a Relatively Permanent Waterway.

- RGM: Impacts to 0.01 acre of resource labeled 1c-3a by the 1999/2000 survey effort are not accounted for in the 2013/2014 impact tally because this resource is considered upland. It was identified by the 1999/2000 survey effort but not identified in 2013/2014 as it is a septic lagoon that has likely been filled in between the time of that survey and the 2013/2014 investigation.
- RGM: The main increase in acreage; however, is due to two aquatic resources that were not previously identified (40-4, a vegetated stockpond; and 40-5, a PEM/PSS wetland) as well as the increase in previously identified area 2c-1 (40-3, a PEM/PSS wetland).

Table4: RGM6 Alternative Impacts to Potential Wetlands/Other WOUS

1999-2000 ID	2013 ID	1999-2000 ID Permanent Impacts*		2013 ID Permanent Impacts*	
		Impacts (Acres)	Impacts (Linear Feet)	Impacts (Acres)	Impacts (Linear Feet)
**	39-1b	<0.01	N/A	<0.01	77
1c-2a, 1c-2b	39-6a	0.26	N/A	0.15	N/A
	39-6b			0.11	N/A
**	39.7	N/A	N/A	<0.01	100
1c-1 ²	39-8	0.04	N/A	0.04	N/A
1c-3a	**	0.01	N/A	N/A	N/A
1c-3b	39-11	0.03	N/A	0.03	N/A
2c-1	40-3	0.02	N/A	0.11	N/A
2c-2 ¹	39-10 ¹	0.01	N/A	0.01	N/A
**	40-4	N/A	N/A	0.06	N/A
**	40-5	N/A	N/A	0.17	N/A
Total		0.37	N/A	0.69	177

* Total 2013 wetland impacts differ from the 1999–2000 impacts; see section 7.4.3

**Water resource not delineated/identified in data set noted

¹Identified as non-jurisdictional but mitigated under CDOT’s Wetland Program guidelines

²Determined non-jurisdictional in 1999-2000 but identified as potentially jurisdictional during the 2013 delineation

- RGM6 (a refinement of RGM): With the 2013/2014 data set RGM6, results in 0.69 acre total impact to wetlands and other Waters of the US – broken down as 0.01 acre ditch/177 linear feet; 0.24 acre pond; 0.43 acre wetland; and <0.01 acre roadside ditch (that meets the three parameters to be wetland but has no connection to other Waters; not likely to be JD under the CWA).
- RGM6 (a refinement of RGM): The 1999/2000 data does not include the limits of two irrigation ditches mapped during the 2013/2014 field survey (39-1b and 39-7). This resource was not likely included during the 1999/2000 field survey because the U.S. Army

Corps of Engineers did not identify these types of aquatic resources as jurisdictional under the Clean Water Act prior to 2007 when the Rapanos Guidance was established.

- RGM6 (a refinement of RGM): Impacts to 0.01 acre of resource labeled 1c-3a by the 1999/2000 survey effort are not accounted for in the 2013/2014 impact tally because this resource is considered upland. It was identified by the 1999/2000 survey effort but not identified in 2013/2014 as it is a septic lagoon that has likely been filled in between the time of that survey and the 2013/2014 investigation.
- The main increase in acreage is due to two aquatic resources that were not previously identified (40-4, a vegetated stockpond; and 40-5, a PEM/PSS wetland) as well as the increase in previously identified area 2c-1 (40-3, a PEM/PSS wetland).

Based on the above, the alternatives generally follow the same order of progression with the 1999/2000 data to the 2013/2014 data. With the inclusion of irrigation ditches that were not considered by the USACE to be jurisdictional under the CWA at the time of the 1999/2000 survey combined with the increased size of several mapped wetlands and the inclusion of open waters, we feel the above demonstrates how the increase in proposed impact has resulted from the Revised G Modified (SFEIS) alignment to the RGM alignment evaluated in the 2014 Independent Alternatives Analysis.

Using the 1999/2000 data, the Revised G Modified (SFEIS) increases from 0.03 acre of wetland impacts to 0.05 acre of impact as presented in the 2014 Independent Alternatives Analysis where the refined design has been applied (RGM). Applying the 2013/2014 data set to the refined design (RGM) to calculate proposed impacts, the result is an increase from the 0.03 acre presented in the SFEIS (Revised G Modified) to 0.19 acres (including 583 linear feet of ditch) presented in the 2014 Independent Analysis (RGM). For apples-to-apples comparison, the tables above include impact calculations for the R5 and RGM6 using both the 1999/2000 and 2013/2014 data sets.

Section 4(f)

In our analysis of practicability, we looked at whether or not any violation of state or federal law would occur. Compared to other alternatives including the previously proposed Revised G Modified alternative, the RGM6 alternative has the least overall harm to Section 4(f) properties. It has 9.7 fewer acres of impact to the Webb Ranch when compared to the Revised G Modified Alternative. When compared to the other feasible and prudent alternatives analyzed in the Revised Section 4(f) Evaluation, it only uses three Section 4(f) properties: the Webb Ranch, Craig Limousin Ranch, and Co-op Ditch. The Revised F Modified Alternative uses the Webb, Craig Limousin and Schaeferhoff-Cowan Ranches, the Clark Property, and the Webb-Hotter

Lateral ditch at three locations. The Eastern Realignment Alternative results in a use of two historic ranches (the Schaeferhoff-Cowan Ranch and the Craig Limousin Ranch Property), as well as uses to segments of the Webb-Hotter Lateral and Co-op Ditches.

Quantitative comparison of Section 4(f) impacts shows the relative magnitude of associated impacts to the ranches and ditches for consideration. The RGM6 (Preferred) Alternative impacts the lowest amount of acreage. Revised F Modified and RGM6 Alternatives have the lowest impacts to the Co-op Ditch, and the RGM6 (Preferred) Alternative has no impacts to the Webb-Hotter Lateral Ditch.

Use of historic ranches and the historic residential property weighs heavily in the least harm analysis because the magnitude of impacts from highway construction cannot be easily mitigated. The severity of remaining harm to the Webb Ranch is clearly the least with the RGM6 (Preferred) Alternative.

The relative severity of remaining harm to the two segments of the Webb-Hotter Lateral is worse with the Eastern Realignment Alternative and with the Revised F Modified Alternative, simply because the RGM6 (Preferred) Alternative does not affect this property.

The RGM6 (Preferred) Alternative better responds to both the safety and capacity components of the project purpose and need. It includes a round-a- bout which is the safest at-grade intersection. It is safer from a vehicular/wildlife conflict standpoint because it has more natural crossing for wildlife to safely cross under the new highway. Wildlife/vehicular conflicts are one of the largest accident issues on US 550 south of US 160. The round-a-bout has greater capacity for traffic growth over time.

Comparison of impacts to environmental and social resources for the three prudent and feasible alternatives provides additional factors to consider in the least harm analysis. Fewer impacts to irrigated farmland; deer and elk winter and severe winter range; bald eagle winter range; eligible archaeological sites; and residential, commercial, and total right-of way-use support the RGM6 (Preferred) Alternative as the least harm alternative.

In summary, the RGM6 (Preferred) Alternative is considered to be the least overall harm alternative based on the following comparison to other feasible and prudent alternatives:

- ▶ This alternative uses three Section 4(f) properties; all other feasible and prudent alternatives use more than three Section 4(f) properties.
- ▶ This alternative uses the least area from Section 4(f) properties.
- ▶ This alternative is simpler to mitigate and has the least severity of remaining harm.

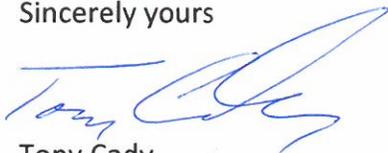
- ▶ This alternative better responds to both the safety and the capacity elements of the project purpose and need.
- ▶ This alternative results in adverse effect determinations to six archaeological sites. Revised F Modified Alternative results in adverse effect determinations to eight archaeological sites, and the Eastern Realignment Alternative results in adverse effect determinations to seven sites.
- ▶ This alternative has the least (when compared to other prudent and feasible alternatives) impacts to irrigated farmlands, elk winter range, elk severe winter range, deer winter range, deer severe winter range, south western willow flycatcher habitat, and bald eagle winter range.
- ▶ This alternative has the least impacts to existing land uses: number of residences, number of commercial uses, and total right-of-way required.

Summary

Compared to Revised G Modified, Alternative RGM6 is the Least Environmentally Damaging Practicable Alternative because it:

- Best meets the safety and capacity components of the project purpose and need (as described above);
- Does not violate any federal laws. RGM would violate Section 4(f), a federal law, and therefore does not meet the logistics component of practicability;
- Has nearly identical Waters of the US impact to that of Revised G Modified (0.43 acres vs. 0.40 acres) if allowances are made for in-kind/on-location replacement of irrigation features;
- Impacts primarily wetlands with relatively low function and value. Most of the direct impacts are to three stock ponds and a fringe wetland, which are primarily associated with agriculture and are therefore relatively impermanent; and
- Has less impact to elk winter concentration areas (22.3 acres compared to 26.2 acres)

Sincerely yours



Tony Cady

Region 5 Planning and Environmental Manager

Revised Table 7-1 (From AMEC Independent Alternatives Analysis): Wetland and Other Waters Located within the US 550-US160 Reconnect Study Area (October 2014, Wetland Delineation Report)

2013 ID ⁽¹⁾	99-2000 ID ⁽²⁾	Linear feet	Square ft	Acres	Cowardin Class ⁽³⁾	Type of Water	Functional Type ⁽⁴⁾	Notes and Observations	Location	Rapanos Rationale	JD?
37-1	N/A	548	3,316	0.08	N/A	Ephemeral Stream	N/A	Gulch B, approximately 6' wide	NW corner of Webb property	Nexus to RPW/TNW	Yes
37-2	N/A	1,229	6,180	0.14	R4SB	Intermittent Stream	N/A	Gulch A, locally known as Bear Gulch, app. 5' wide	East of 550/160 Junction	RPW Nexus to TNW	Yes
37-2a	N/A	129	394	0.01	R4SB	Intermittent Stream	N/A	Approximately 3' wide	side channel of 37-2	RPW Nexus to TNW	Yes
37-2b	N/A	N/A	710	0.02	PEM	Stream Fringe	SF-4	Located along both sides of Bear Gulch	Along Bear Gulch	Abutting RPW	Yes
37-2c	1b-3	N/A	4,259	0.1	PEM	Hillside Seep	HS-3	Steep hillside seep, includes bare ground with taverline-like deposits	Drains to Bear Gulch	Abutting RPW	Yes
37-2d	1b-3	N/A	11,846	0.27	PEM	Hillside Seep	HS-3	Steep hillside seep, includes bare ground with taverline-like deposits	Drains to Bear Gulch	Abutting RPW	Yes
38-1	1b-6, 1b-7	N/A	6,323	0.14	PEM	Hillside Seep	HS-3	Steep hillside seep, includes bare ground with taverline-like deposits	Slopes above US 550 on Farmington Hill	Abutting RPW	Yes
38-2	1b-8	N/A	64,042	1.47	PEM	Stream Fringe	SF-3	Steep hillside seep, drains to Wilson Gulch	Slopes below 550 on Farmington Hill	Abutting RPW	Yes
38-2a	N/A	1,020	4,093	0.09	R3UB	Perennial Stream	N/A	Wilson Gulch stream channel, variable in width, approximately 4' wide.	South of US 160	RPW Nexus to TNW	Yes
38-3	N/A	N/A	5,396	0.12	PEM	Hillside Seep	HS-3	Steep hillside seep, includes bare ground with taverline-like deposits	Steep hillside seep, includes bare ground with taverline-like deposits	Abutting RPW	Yes
38-4	N/A	N/A	4,028	0.09	PEM	Hillside Seep	HS-3	Steep hillside seep, drains to Wilson Gulch	Steep hillside seep, drains to Wilson Gulch	Adjacent to RPW	Yes
39-1	1b-9a	N/A	1,690	0.04	PEM	Ditch Fringe	D-3	1' wide PEM fringe along both sides of ditch	1' wide PEM fringe along both sides of ditch		
39-1a	N/A	967	1,936	0.04	R4SBx	Irrigation Ditch	N/A	1-2' wide, no fringing wetlands	1-2' wide, no fringing wetlands	RPW Nexus to TNW	Yes
39-1b	N/A	989	1,980	0.05	R4SBx	Irrigation Ditch	N/A	1-2' wide, no fringing wetlands	1-2' wide, no fringing wetlands	RPW Nexus to TNW	Yes
39-1c	1b-9a	842	843	0.02	R4SBx	Irrigation Ditch	D-3	1' wide PEM fringe along both sides of ditch (39-1c)	1' wide PEM fringe along both sides of ditch (39-1c)	RPW Nexus to TNW	Yes
39-2	1b-9b	N/A	4,160	0.1	L2EM	Vegetated Stock Pond	P-2	Small stock pond, fed by irrigation water, very little water at time of survey	Small stock pond, fed by irrigation water	Abutting RPW	Yes
39-2a	N/A	55	142	<0.01	R4SBx	Irrigation Ditch	N/A	Ditch that carries water to 39-2, approximately 2.5' wide	Ditch that carries water to 39-2	RPW Nexus to TNW	Yes
39-2b	N/A	21	46	<0.01	R4SBx	Irrigation Ditch	N/A	Ditch that carries overflow water from pond back to 39-1, approximately 2' wide	Ditch that carries overflow water from pond back to 39-1	RPW Nexus to TNW	Yes
39-3	1c-2a	N/A	3,458	0.08	L2EM	Vegetated Stock Pond	P-2	Small stock pond, fed by irrigation water, standing water present	Small stock pond, fed by irrigation water	Abutting RPW	Yes
39-4	1c-2a	N/A	8,214	0.19	PEM	Wet Valley	WV-5	Hydrology restricted by farm road culvert	Stock pond fed by irrigation water, located along natural drainageway	Abutting RPW	Yes
39-5	N/A	120	242	0.01	R4SBx	Irrigation Ditch	N/A	Carries irrigation water from 39-3 to 39-4, approximately 2' wide	Carries irrigation water from 39-3 to 39-4	RPW Nexus to TNW	Yes
39-6a	N/A	N/A	6,369	0.15	L2EM	Vegetated Stock Pond	P-3	Stock pond fed by irrigation water, located along natural drainageway, standing water present	Stock pond fed by irrigation water, located along natural drainageway	Abutting RPW	Yes
39-6b	1c-2a	N/A	4,727	0.11	PEM	Pond Fringe	P-3	Wetland fringing the pond (i.e., outside of ponds OHWM)	Wetland fringing the pond (i.e., outside of ponds OHWM)	Abutting RPW	Yes
39-7	N/A	100	202	<0.01	R4SBx	Irrigation Ditch	N/A	Ditch that carries water from 39-6a, approximately 2' wide	Ditch that carries water from 39-6a	RPW Nexus to TNW	Yes
39-8	1c-1	N/A	1,725	0.04	PEM/PSS	Wet Valley	WV-3	Depression in natural drainageway	Depression in natural drainageway	Adjacent to RPW	Yes
39-9	N/A	256	515	0.01	N/A	Roadside Ditch	N/A	No fringing wetlands (i.e., no hydrophytic vegetation), approximately 2' wide	No wetlands	Not an RPW	No
39-10	2c-2	N/A	346	0.01	PEM	Roadside Depression	RD-1	Depression that meets three parameters, but has no connection to other waters (i.e., not JD per SWANCC)	depression with no connection to other waters	Isolated	No
39-11	1c-b3	N/A	8,855	0.20	L2EM/L2SS	Vegetated Stock Pond	P-3	Vegetated Stock Pond located in natural drainageway, standing water present	Vegetated Stock Pond located in natural drainageway	Abutting RPW	Yes
39-12	N/A	444	1,788	0.04	N/A	Ephemeral Stream	N/A	Carries water from 39-11 to Animas River, approximately 4' wide	Carries water from 39-11 to Animas River	Nexus to TNW	Yes
40-2	N/A	1,182	2,367	0.05	R4SBx	Irrigation Ditch	N/A	No fringing wetlands, discharges to upland agricultural field, approximately 2' wide	Western edge of Craig property	no Nexus to TNW	No
40-3	2c-1	N/A	4,966	0.11	PEM/PSS	Wet Valley	WV-4	mapped/historic intermittent stream	Parallels US 550	Adjacent to TNW	Yes
40-4	N/A	N/A	2,740	0.06	L2EM	Vegetated Stock Pond	P-4	Possibly abandoned, soils saturated, but no ponded water at time of survey. Meets three parameters for wetland determination.	East of US 550	Adjacent to TNW	Yes
40-5	N/A	N/A	8,458	0.19	PEM/PSS	Wet Valley	WV-4	Not field surveyed due to property access, mapped as intermittent blue-line stream on USGS	West of US 550	Adjacent to TNW	Yes
41-1	N/A	N/A	1,799	0.04	PSS	Stream Fringe	SF-4	Marked in field as WA-A	Intersection of Hwy 172 and CR 220	Abutting RPW	Yes

Revised Table 7-1 (From AMEC Independent Alternatives Analysis): Wetland and Other Waters Located within the US 550-US160 Reconnect Study Area (October 2014, Wetland Delineation Report - *continued*)

2013 ID ⁽¹⁾	99-2000 ID ⁽²⁾	Linear feet	Square ft	Acres	Cowardin Class ⁽³⁾	Type of Water	Functional Type ⁽⁴⁾	Notes and Observations	Location	Rapanos Rationale	JD?
41-1a	N/A	131	955	0.02	R4SBx	Irrigation Ditch	N/A	Marked in field as WA-AA, cement on south side, approximately 7.5' wide	Intersection of Hwy 172 and CR 220	RPW Nexus to TNW	Yes
41-2	N/A	N/A	894	0.02	PEM	Roadside Depression	RD-1	Marked in field as WA-B	North side of CR 220	Abutting RPW	Yes
41-3	N/A	N/A	770	0.02	PEM	Roadside Depression	RD-1	Marked in field as WA-C	North side of CR 220	Abutting RPW	Yes
41-4	N/A	11	12	<0.01	R4SBx	Irrigation Ditch	N/A	Marked in field as WA-D, 1 foot wide, this supports WA-E	North side of CR 220	RPW Nexus to TNW	Yes
41-4a	N/A	N/A	55	<0.01	PEM	Fringe around ditch	DS-1	Marked in field as WA-E, fringe wetland surrounding WA-D	North side of CR 220	Abutting RPW	Yes
41-5	N/A	20	42	<0.01	R4SBx	Irrigation Ditch	N/A	Marked in field as WA-F, 2 feet wide, supports WA-G, approximately 2' wide	North side of CR 220	RPW Nexus to TNW	Yes
41-5a	N/A	N/A	47	<0.01	PEM	Fringe around ditch	DS-1	Marked in field as WA-G, fringe wetland surrounding WA-F	North side of CR 220	Abutting RPW	Yes
41-6	N/A	N/A	955	0.02	PEM	Roadside depression	RD-1	Marked in field as WA-H	North side of CR 220	Abutting RPW	Yes
41-7	N/A	N/A	983	0.02	PEM	Roadside depression	RD-1	Marked in field as WA-I	North side of CR 220	Abutting RPW	Yes
41-8	N/A	93	94	<0.01	R4SBx	Irrigation Ditch	N/A	Marked in field as WA-J, 1 foot wide, supports WA-K	North side of CR 220	RPW Nexus to TNW	Yes
41-8a	N/A	N/A	372	0.01	PEM	Fringe around ditch	DS-1	Marked in field as WA-K, fringe wetland surrounding WA-J	North side of CR 220	Abutting RPW	Yes
41-9	N/A	130	131	<0.01	R4SBx	Irrigation Ditch	N/A	Marked in field as WA-L, 1 foot wide, supports WA-M	North side of CR 220	RPW Nexus to TNW	Yes
41-9a	N/A	N/A	527	0.01	PEM	Fringe around ditch	DS-1	Marked in field as WA-M, fringe wetland surrounding WA-L	North side of CR 220	Abutting RPW	Yes
41-9b	N/A	85	85	<0.01	R4SBx	Irrigation Ditch	N/A	Marked in field as WA-L, west of driveway, 1' wide	North side of CR 220	RPW Nexus to TNW	Yes
41-9c	N/A	N/A	316	0.01	PEM	Fringe around ditch	DS-1	Marked in field as WA-M, west of driveway	North side of CR 220	Abutting RPW	Yes
41-9d	N/A	9	10	<0.01	R4SBx	Irrigation Ditch	N/A	Marked in field as WA-N, 1' wide, no fringe wetland	North side of CR 220	RPW Nexus to TNW	Yes
41-10	N/A	9	10	<0.01	R4SBx	Irrigation Ditch	N/A	Marked in field as WA-O, 1' wide, supports WA-P	North side of CR 220	RPW Nexus to TNW	Yes
41-10a	N/A	N/A	236	0.01	PEM	Fringe around ditch	DS-1	Marked in field as WA-P, fringe wetland surrounding WA-O	North side of CR 220	Abutting RPW	Yes
41-11	N/A	N/A	1,019	0.02	PEM	Roadside depression	RD-1	Marked in field as WA-Q	North side of CR 220	Adjacent to RPW	Yes
41-12	N/A	N/A	609	0.01	PEM	Roadside depression	RD-1	Marked in field as WA-R	North side of CR 220	Adjacent to RPW	Yes
41-13	N/A	N/A	670	0.02	PEM	Roadside depression	RD-1	Marked in field as WA-S	North side of CR 220	Adjacent to RPW	Yes
41-14	N/A	11	12	<0.01	R4SBx	Irrigation Ditch	N/A	Marked in field as WA-T, 1' wide, supports WA-U	North side of CR 220	RPW Nexus to TNW	Yes
41-14a	N/A	N/A	31	<0.01	PEM	Fringe around ditch	DS-1	Marked in field as WA-U, fringe wetland surrounding WA-T	North side of CR 220	Abutting RPW	Yes
41-15	N/A	N/A	1,338	0.03	PEM	Roadside depression	DS-1	Marked in field as WA-V	North side of CR 220	Adjacent to RPW	Yes
42-1	N/A	N/A	36	<0.01	PEM	Roadside depression	RD-1	Marked in field as WA-W	North side of CR 220	Adjacent to RPW	Yes
42-2	N/A	10	24	<0.01	R4SBx	Irrigation ditch	N/A	Marked as WA-X, 2' wide, supports WA-Y	North side of CR 220	RPW Nexus to TNW	Yes
42-2a	N/A	N/A	40	<0.01	PEM	Fringe around ditch	D-3	Marked in field as WA-Y, fringe wetland surrounding WA-X	North side of CR 220	Abutting RPW	Yes
42-3	N/A	N/A	1,646	0.04	PSS	Roadside depression	RD-4	Marked in field as WA-Z	North side of CR 220	Abutting RPW	Yes
42-4	N/A	N/A	254	0.01	PSS	Roadside depression	RD-1	Marked in field as WA-BB, ditch WA-CC at west end of this depression	North side of CR 220	Abutting RPW	Yes
42-4a	N/A	6	42	<0.01	R4SBx	Irrigation Ditch	N/A	Marked in field as WA-CC, 6' wide, supports WA-BB and WA-DD	North side of CR 220	RPW Nexus to TNW	Yes
42-4b	N/A	N/A	63	<0.01	PEM	Fringe around ditch	RD-1	Marked in field as WA-DD, fringe wetland surrounding WA-CC	North side of CR 220	Abutting RPW	Yes
42-5	N/A	N/A	61	<0.01	PEM	Roadside depression	RD-1	Marked in field as WA-EE	North side of CR 220	Adjacent to RPW	Yes
42-6	N/A	N/A	68	<0.01	PEM	Fringe around ditch	RD-1	Marked in field as WA-FF, abuts Irrigation ditch off of ROW	North side of CR 220	Abutting RPW	Yes
42-7	N/A	N/A	14	<0.01	PEM	Roadside depression	DS-1	Marked in field as WA-GG	North side of CR 220	Adjacent to RPW	Yes
43-1	N/A	N/A	2	<0.01	PSS	Roadside depression	DS-1	Marked in field as WA-HH	South side of CR 220	Abutting RPW	Yes
43-2	N/A	N/A	23	<0.01	PEM	Roadside depression	DS-1	Marked in field as WA-II	South side of CR 220	Adjacent to RPW	Yes
43-3	N/A	N/A	156	<0.01	PSS	Roadside depression	RD-1	Marked in field as WA-JJ	South side of CR 220	Adjacent to RPW	Yes
43-4	N/A	N/A	2,128	0.05	PEM/PSS	Roadside depression	RD-1	Marked in field as WA-KK	South side of CR 220	Abutting RPW	Yes

Revised Table 7-1 (From AMEC Independent Alternatives Analysis): Wetland and Other Waters Located within the US 550-US160 Reconnect Study Area (October 2014, Wetland Delineation Report - *continued*)

2013 ID ⁽¹⁾	99-2000 ID ⁽²⁾	Linear feet	Square ft	Acres	Cowardin Class ⁽³⁾	Type of Water	Functional Type ⁽⁴⁾	Notes and Observations	Location	Rapanos Rationale	JD?
43-5	N/A	N/A	71	<0.01	PEM	Irrigation ditch	DS-1	Marked in field as WA-LL	South side of CR 220	Abutting RPW	Yes
43-6	N/A	10	23	<0.01	R4SBx	Irrigation ditch	N/A	Marked in field as WA-MM, 2' wide ditch	South side of CR 220	RPW Nexus to TNW	Yes
43-6a	N/A	N/A	47	<0.01	PEM	Fringe around ditch	D-3	Marked in field as WA-NN, fringe wetland around WA-MM.	South side of CR 220	Abutting RPW	Yes
43-7	N/A	N/A	241	0.01	PEM/PSS	Roadside depression	RD-4	Marked in field as WA-OO	South side of CR 220	Abutting RPW	Yes
43-8	N/A	N/A	210	<0.01	PEM	Fringe around ditch	D-3	Marked in field as WA-PP	South side of CR 220	Abutting RPW	Yes
43-9	N/A	16	77	<0.01	R4SBx	Irrigation Ditch	N/A	Marked in field as WA-QQ, 4' wide, supports WA-RR.	South side of CR 220	RPW Nexus to TNW	Yes
43-9a	N/A	N/A	125	<0.01	PEM/PSS	Fringe around ditch	D-2	Marked in field as WA-RR, fringe wetland around WA-QQ.	South side of CR 220	Abutting RPW	Yes
43-10	N/A	N/A	83	<0.01	PEM	Fringe around culvert	D-3	Marked in field as WA-SS, abuts ditch is outside of the ROW	South side of CR 220	Abutting RPW	Yes
43-11	N/A	N/A	937	0.02	PSS	Roadside depression	RD-1	Marked in field as WA-TT	South side of CR 220	Abutting RPW	Yes
43-12	N/A	N/A	32	<0.01	PSS	Roadside depression	D-2	Marked in field as WA-UU	South side of CR 220	Abutting RPW	Yes
44-1	1a-1, 1a-3, 1b-1, 1b-2	N/A	81,934	1.88	PEM/PSS	Stream Fringe	SF-3	Abuts Wilson Gulch	North of US 160	Abutting RPW	Yes
44-1a	N/A	2,111	8,450	0.19	R3UB	Perennial Stream	N/A	Variable in width	North of US 160	RPW Nexus to TNW	Yes
45-1	N/A	N/A	1,544	0.04	PEM/PSS	Stream Fringe	SF-3	Abuts Wilson Gulch	South of US 160	Abutting RPW	Yes
45-2	N/A	79	415	0.01	N/A	Ephemeral Stream	N/A	Approximately 5' wide	South of US 160	Nexus to RPW/TNW	Yes
46-2	N/A	N/A	47,881	1.1	PEM/PSS	Stream fringe	SF-3	Abuts Wilson Gulch	North of US 160	Abutting RPW	Yes
46-2a	N/A	1,882	5,652	0.13	R3UB	Perennial stream	N/A	Wilson Gulch north of US 160, approximately 3' wide	North of US 160	Nexus to RPW/TNW	Yes
46-3	N/A	N/A	46,033	1.09	PEM/PSS	Stream fringe	SF-3	Abuts Wilson Gulch	North of US 160	Abutting RPW	Yes
46-3a	N/A	544	1,638	0.04	R3UB	Perennial stream	N/A	Wilson Gulch north of US 160, approximately 3' wide	North of US 160	Nexus to RPW/TNW	Yes
Total		13,059	394,073	9.03							

⁽¹⁾See Figures within Appendix A of the Wetland Delineation report (SME, October 2014) for wetland and other WOUS locations.
⁽²⁾ Several features identified in 2013 were not identified in 1999/2000 delineation. Further, features identified as a single wetland in 2013 were identified as multiple features in 1999/2000 and vice versa.
⁽³⁾Cowardin et. al. 1979
PSS—Palustrine scrub-shrub
PEM—Palustrine emergent
PEM/PSS—Mix of PSS and PEM
R4SB—Riverine intermittent streambed
R3UB—Riverine perennial unconsolidated bottom
L2EM—Lacustrine littoral emergent
⁽⁴⁾Functional Wetland Types
WV-3 Small wet valley, some shrubs present
WV-5 Small wet valleys, emergent vegetation only
D-3 Ditches in upland areas with emergent vegetation
P-2 Farm or residential pond
P-4 Abandoned pond
RD-3 Standard roadside ditch
HS-3 Large travertine-like hillside seeps in wooded valley
SF-4 Small streams with emergent fringe wetlands or drying scrub shrub
WV-4 Drained and disturbed
D-2 Possible groundwater discharge or natural discharge, emergent vegetation
DS-1 Ditch seep in pastures, wet meadows, shallow marsh vegetation
P-3 Farm or residential pond in drainageway
RD-1 Roadside depression/groundwater discharge
RD-4 Roadside ditch intersected by natural drainage
SF-3 Small stream, shrub wetlands and emergent wetlands with a forested canopy



United States Department of the Interior



FISH AND WILDLIFE SERVICE
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Colorado Field Office
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Denver, Colorado 80225-0486

IN REPLY REFER TO:
ES/LK-6-CO-06-F-011
TAILS: 06E24000-2015-I-0019

NOV 3 2014

Mark Lawler
Colorado Department of Transportation
3803 North Main Avenue, Suite 300
Durango, Colorado 81301

Dear Mr. Lawler:

Based on the authority conferred to the U.S. Fish and Wildlife Service (Service) by the Endangered Species Act of 1973, as amended (ESA - 50 CFR §402.14), the Service reviewed your October 1, 2014, report regarding the impacts of three different alternatives for the realignment of the US550 South Connection to US160 in Durango, La Plata County, Colorado, on the endangered Southwestern Willow Flycatcher (*Empidonax trailii extimus*) and the endangered New Mexico meadow jumping mouse (*Zapus hudsonius luteus*) and their critical habitats.

The realignment is part of the larger 2006 Final Environmental Impact Statement/4(f) Evaluation for US160 from Durango to Bayfield (FEIS), which we consulted on prior to the listing of the New Mexico meadow jumping mouse and the designation of critical habitat for the Southwestern Willow Flycatcher (ES/LK-6-CO-06-F-011). In 2012, a Supplemental EIS was prepared to analyze the effects of a modified US550 connection, which has been subsequently modified based on the results of an independent engineering analysis of the project. In 2014, we again consulted on the FEIS in response to the need to reauthorize the Individual Permit issued by the U.S. Army Corps of Engineers (06E24000-2014-F-0102). In that consultation, we determined that the project was likely to adversely affect the species and their critical habitats. Currently, you are requesting concurrence that none of the three alternatives proposed for the US550 Connector are likely to adversely affect the New Mexico meadow jumping mouse or the Southwestern Willow Flycatcher or their designated critical habitats.

The proposed alternatives would construct between 1.3 and 1.7 miles of new four-lane roadway and partially or completely abandon and reclaim 1.5 miles of two-lane roadway. At the south end of the project area, US550 milepost 15.4, all three alternatives connect to the existing US550 alignment. Ramp and bridge configurations differ for all the projects and are described in your report.

Elevation in the survey area (an area that included the proposed project limit as well as ½-mile buffer) ranges from approximately 6,400 feet to 6,700 feet. The area contains some existing low-density residential parcels with associated access roads and outbuildings. Dominant

vegetation within the survey area is piñon-juniper woodland with a heavy Gambel oak (*Quercus gambelii*) component; some scattered Ponderosa pines (*Pinus ponderosa*) are also present. Wilson Gulch intersects the project area, and flows generally east to west into the Animas River. Overstory vegetation within the gulch is dominated by Gambel oak though scattered Russian olive (*Elaeagnus angustifolia*) and narrowleaf cottonwood (*Populus angustifolia*) are also present. Within the channel, short stands of coyote willow (*Salix exigua*) and dense broadleaf cattail (*Typha latifolia*) dominate. Other herbaceous plants within Wilson Gulch include reed canarygrass (*Phalaris arundinacea*), hardstem bulrush (*Schoenoplectus acutus*), spikerush (*Eleocharis palustris*), bulrush (*Schoenoplectus spp.*, *Scirpus spp.*), and some scattered sedges (*Carex spp.*).

The New Mexico meadow jumping mouse prefers emergent herbaceous wetlands with adjacent scrub-shrub wetlands and a source of perennial flowing water. Suitable riparian/wetland habitat consists of dense herbaceous vegetation with an average height of 24 inches composed primarily of sedges and forbs. The habitat at Wilson Gulch, which is composed primarily of cattails with some patches of emergent herbaceous wetland species, is not the type preferred by the species. In addition, within the area of the FEIS, New Mexico meadow jumping mouse habitat and occupancy has been identified only at the Florida River, where impacts are likely to adversely affect the species. In the survey area of the US550 South Connection however, impacts are expected to be discountable due to the low likelihood of the species occurrence there. Critical habitat for the species has not been designated in the survey area, so none will be affected.

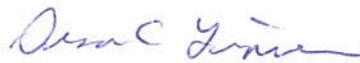
The Southwestern Willow Flycatcher depends on dense riparian thickets adjacent to or underlain by saturated soils, standing water, streams, and/or pools. Nest sites typically have a dense canopy and dense foliage from ground level to approximately 13 feet above ground level. In Colorado, willow patches covering a minimum of ¼ acre with at least some portion attaining 30 feet in width and 6 feet in height are considered suitable for the species. Habitat meeting these criteria occurs near Wilson Gulch, and stringers of habitat along Wilson Gulch offer connectivity to foraging and nesting habitat. The amount of permanent and temporary impact varies among the three alternatives from no impact to 0.5 acre of impact as described in your report. In addition, this affected habitat will be removed outside the breeding season and will be replaced at a 2:1 ratio as described in your 2006 biological assessment. Southwestern Willow Flycatchers have not been observed in the surveyed area, although they have been observed east of the area near Bayfield on the Los Piños River. The area will be surveyed for the species prior to project construction. Given that the amount of impact to habitat is small and that the habitat is likely unoccupied, effects of the project are expected to be insignificant and discountable. If pre-construction surveys indicate that the affected areas are being used by the species, consultation will be reinitiated. Critical habitat for the species has not been designated in the survey area, so none will be affected.

Given your project description and location, the Service finds the report acceptable and agrees with the determination that the impacts resulting from the proposed project are not likely to adversely affect the New Mexico meadow jumping mouse and the Southwestern Willow Flycatcher.

Should project plans change or if additional information regarding listed or proposed species becomes available, this determination may be reconsidered under the ESA. If the proposed project has not commenced within one year, please contact the Colorado Field Office to request an extension.

If the Service can be of further assistance, please contact Alison Deans Michael of my staff at 303 236-4758.

Sincerely,



Susan C. Linner
Colorado Field Supervisor

ec: CDOT, R5 (Mark Lawler)
Michael

Ref: Alison\H:\My Documents\CDOT 2005\Region 5\US160 DEIS\US550_S_Connection_US160_alternatives_analysis_concur.doc



COLORADO

Department of Transportation

Region 5

Environmental and Planning

3803 N. Main Avenue

Durango, CO 81301

December 2, 2014

Kara Hellige
US Army Corps of Engineers
Durango Regulatory Field Office
Sacramento District
1970 E. 3rd Ave, Suite 109
Durango, Colorado 81301

Dear Ms. Hellige:

In 2006 the Colorado Department of Transportation (CDOT) and the Federal Highway Administration (FHWA) cooperated with your office on the US 160 Durango to Bayfield Environmental Impact Statement (EIS). This cooperation effort occurred in compliance with the 2006 version of the 404/NEPA merger process for Colorado and resulted in a 404 permit (IP 200275568). The permit was conditioned to allow the phased review of the project to insure that the project abides with the permit requirements.

During this process your office formally concurred with three key points:

1. That the Purpose and Need can be utilized by the Corps for their definition of overall project purpose, and that the alternative screening criteria met the Corps' NEPA and CWA requirements;
2. That the identification of the alternatives selected for analysis was a reasonable range of alternatives under NEPA and practicable under the CWA;
3. That the Preferred Alternative appears to be the Least Environmentally Damaging alternative.

Your concurrence of these points remains valid for all project phases identified in the 2006 US 160 EIS.

In 2012, during the development of the Supplemental Environmental Impact Statement (SEIS) for US 550 South Connection to US 160, CDOT realized that we had allowed the 404 permit obtained for the US 160 EIS corridor project to expire. Once we realized our error, we requested re-authorization of the 404 permit from your office. Since the issuance of the 2006 permit, significant changes to the ACOE program have included the 2008 Mitigation Rule, the issuance of the Arid West Supplement Version 2 in 2008, and the development of the South Pacific Division (SPD) Mitigation Ratio Checklist. The 2008 Mitigation Rule requires that a final mitigation plan be provided prior to the issuance of a permit. The SPD mitigation ratio checklist requires that the Corps provides justification for mitigation ratios. In order to provide this justification, the applicant must identify the mitigation type, mitigation community, and acreages compared to impacts. The Corps cannot complete this checklist without having impact and mitigation quantities. This checklist must be completed prior to permit issuance. The uniform performance standards are to be included within the final mitigation report and are based on the objectives of the mitigation. The Arid West Supplement affects the delineation of wetlands. Therefore, the wetland boundaries were likely have had changed since the original delineation in 2002.

Additionally, the Sacramento District Regulatory Division Chief raised concerns regarding the phased IP approach. Currently, the Sacramento District policy is to review long term transportation projects as individual phases, unless the applicant can provide enough detail to determine that the design has avoided and minimized environmental impacts to the greatest extent and the project can clearly identify/quantify those impacts and mitigation. In addition, since CDOT has not been able to commit to the mitigation location, type, and quantity, your office is not able to complete the required mitigation ratio checklist. With these concerns in mind, your office declined to re-authorize the IP for the project, and requested that we proceed with the phased permit approach.

With regards to the US 550 Connection to US 160 SEIS, and due to issues as described above, CDOT seeks your concurrence to terminate the 404/NEPA merger process. The SEIS is limited solely to the connection of US 550 to US 160, and this request is specific to that corridor. Based on preliminary design for the Preferred Alternative in the SEIS, and the anticipated results from the Approved Jurisdiction Determination CDOT plans to have conducted for the study area, we are reasonably certain that an Individual Permit for this project phase will not be required.

CDOT and FHWA are currently conducting a reevaluation of the Supplemental Final EIS pursuant to 23 CFR 771.129. CDOT and FHWA are also preparing a Revised Section 4(f) Evaluation. Both of these documents incorporate a refinement to the Preferred Alternative discussed in the 2012 SFEIS. The refined Preferred Alternative is referred to as Revised G Modified 6 or RGM6. As part of this effort, CDOT conducted a new assessment of wetlands and waters of the U.S. within the project boundaries. The results of this work have been well documented in our letter to your office dated October 24, 2014. This letter discusses several previously identified aquatic sites which likely do not fall under ACOE jurisdiction.

The elimination of these areas from the resource assessment will likely reduce the potential wetlands and waters of the U.S. impacts to levels which could be approved through the Nationwide Permit program. CDOT respectfully requests to withdraw from the 404/NEPA merger process for the US 550 Connection to US 160 SEIS corridor. We make this request understanding that it is specific to the US 550 Connection to US 160, and that the 404/NEPA merger process agreement entered in to by CDOT, FHWA and the ACOE for the 2006 US 160 Durango to Bayfield EIS is still valid.

Sincerely yours,



Tony Cady

Region 5 Planning and Environmental Manager



DEPARTMENT OF THE ARMY
U.S. ARMY ENGINEER DISTRICT, SACRAMENTO
CORPS OF ENGINEERS
1325 J STREET
SACRAMENTO CA 95814-2922

REPLY TO
ATTENTION OF

December 19, 2014

RECEIVED BY
DEC 29 2014
PROGRAM ENG.

Regulatory Division SPK-2002-75568-DC

Mr. Tony Cady
Planning and Environmental Manager, Region 5
Colorado Department of Transportation
3803 N. Main Avenue
Durango, Colorado 81301

Dear Mr. Cady:

We are responding to your December 2, 2014, request for concurrence to terminate the US 550 South Connection to US 160 404/NEPA merger process for the Supplemental Environmental Impact Statement (SEIS). The SEIS is part of the overall US 160 from Durango to Bayfield Improvement project, however the SEIS is limited solely to the connection of US 550 to US 160 and your request is specific to that intersection. Due to the indefinite phased nature of the design and construction of US 160 from Durango to Bayfield Improvement project, the lack of information regarding impacts and mitigation to waters of the U.S., and the independent utility of each phase, we have determined that it is reasonable to review each phase of the project individually.

Based upon your letter, Colorado Department of Transportation (CDOT) is reasonably certain that the construction of the US 550 South Connection to US 160 project will not require the evaluation through an Individual Permit (IP); therefore, we agree that the 404/NEPA merger process can be terminated. If we determine that the project must be evaluated as an IP after reviewing final design plans and completing a jurisdiction determination, reinitiation of the 404/NEPA merger process will be required.

Please refer to identification number SPK-2002-75568-DC in any correspondence concerning this project. If you have any questions, please contact Kara Hellige at the Durango Regulatory Office, 1970 E 3rd Ave., #109, Durango, Colorado 81301, by email at Kara.A.Hellige@usace.army.mil, or telephone at 970-259-1604. For more information regarding our program, please visit our website at www.spk.usace.army.mil/Missions/Regulatory.aspx.

Sincerely,

Susan Bachini Nall
Chief, Colorado West Branch
Regulatory Division



COLORADO

Department of Transportation

Division of Transportation Development

Environmental Programs Branch
4201 E. Arkansas Ave.
Shumate Building
Denver, CO 80222-3400
(303) 757-9281

January 16, 2015

Mr. Edward C. Nichols
State Historic Preservation Officer
History Colorado Center
1200 Broadway
Denver, CO 80203

Subject: Determinations of Eligibility and Effects, Alternatives R5 and RGM6, US 550 South Connection to US 160 Project, La Plata County (CHS #33425)

Dear Mr. Nichols:

This letter and the attached materials constitute a request for concurrence on determinations of eligibility and effects for the project referenced above. We previously consulted with you regarding eligibility and effects for various alternatives between 2009 and 2011, and an MOA was executed in 2012. The Section 106 process was documented in the 2012 US 550 South Connection to US 160 Supplemental Final Environmental Impact Statement (SFEIS)/Section 4(f) Evaluation for the US Highway 160 from Durango to Bayfield EIS. In response to public comment and in an effort to be unbiased and transparent regarding the alternatives, CDOT commissioned an in-depth analysis to evaluate the best alternative to connect US 550 from south of County Road 220 north to US 160. This Independent Alternatives Analysis (IAA) was completed by a consultant team including AMEC Environment and Infrastructure, Muller Engineering Company, and other specialty consultants.

As a result of the IAA, a new preferred alternative has been identified (RGM6). This submittal includes the following updates to historic properties:

1. Updated information about the historic background of the Co-op Ditch segment 5LP9257.2.
2. Alternative R5—Eligibility and Effects. New Alternative R5 was developed and additional survey was completed by consultant HDR to address new properties west of US Highway 550. Note that additional survey for archaeological resources was not completed for this or the other newly designed alternative (RGM6), as all areas proposed for direct effects were either previously inventoried or located on steep, highly eroded slopes that preclude the presence of intact archaeological remains.
3. Alternative RGM6—Eligibility and Effects Determinations. The Preferred Alternative (Revised G Modified) identified in the 2012 SFEIS has been re-designed as Alternative RGM6. The resource base for Alternative RGM6 largely matches that of Revised G Modified, but updated effects determinations have been developed to address the differences between the two.
4. Alternative Revised G Modified—updated Eligibility and Effects Determinations. The Revised G Modified alternative was identified as the preferred alternative in the SFEIS. It has been determined that properties west of US Highway 550 would be affected by Revised G Modified,

but these effects were not discussed in the 2010 consultation for that alternative. This update also includes revisions to the effects information for the historic Webb and Craig Ranches.

1. Clarification, Mason Lateral

In the consultation for the Eastern Realignment Alternative in November 2009, CDOT identified the Co-op Ditch under site number 5LP9257, with two segments evaluated (5LP9257.1 and 5LP9257.2). The ditch was also addressed in the analysis for the Revised F Modified and Revised G Alternatives in December 2010. For all of the previous consultation efforts, there was a finding of *no adverse effect*. Additional research has found that segment 5LP9257.2 south of County Road 220 is actually the Mason Lateral, which has a slightly different history, but maintains the location of the ditch identified as the Co-op Ditch in the 2009 consultation. The site number assigned to the Mason Lateral in 2002—5LP6695.1—has been assigned to this ditch and a new set of site forms is attached.

The former Co-op Ditch (5LP9752.2) was included in the evaluation of effects for Revised G Modified in 2010. The previous consultations indicated that 488 feet of the ditch would be affected as a result of widening the highway from two to four lanes. This effect was based on a common termini developed for alternatives evaluated in the Section 4(f) evaluation. This common termini was applied erroneously to the effects determinations under Section 106. Without the common termini, the ditch segment is south of where the improvements for Revised G Modified would end, and there would be no effect to the ditch, resulting in a finding of *no historic properties affected* for Revised G Modified for this resource. See the attached graphic showing the Revised G Modified alternative for more information about its location relative to the Mason Lateral.

2. Alternative R5

Alternative Description: Alternative R5 is a design variation of Alternative R submitted to CDOT during the public comment period for the 2012 SFEIS. It was modified during the 2014 IAA to meet a higher design speed and deviates from US 550 to meet that criterion. Alternative R5 includes a modified diamond interchange with US Highway 160. See Exhibit 7-8 for more information about the location of this alternative.

Survey Report Corrections: Please note that there are some handwritten corrections in the attached survey report that reflect new information collected after the report was printed. A list of page numbers and a description of the revised content follow:

pp. 26 (Table 3), 45 (Table 4), 46 (Table 5): The report indicates that the Foster property is being treated as NRHP eligible; however, after the report was finalized a field visit revealed that there are no longer any buildings on the property to evaluate and the property is therefore *not eligible*.

p. 46 (Table 4): Denver & Rio Grande Railroad (5LP1131.21): The entire railroad is considered eligible. The documented segment is non-supporting.

pp. 6 (Table 1), 19 (Table 2), 45 (Table 4), 46 (Table 5): The Office of Archaeology and Historic Preservation (OAHP) Compass database indicates that US Highway 550/State Highway 19 (5LP6654) is field eligible. It is not officially eligible as noted in the tables. US Highway 160 (5LP10654) was just evaluated as part of the survey for the R5 Alternative and is considered eligible. It is not officially eligible as noted in the table.

Area of Potential Effects: The APE for this survey was based on design parameters of proposed Alternative R5 and to address the potential for direct and indirect effects to historic properties. The APE boundary encompasses the alternative footprint as well as adjacent parcel boundaries and topographic features. For more information about the APE for Alternative R5, please see pp. 3-4 of the enclosed report as well as the updated map, which shows the APE boundary extending south to include the entire historic property boundary of the Craig Ranch.

Eligibility Determinations: Eleven properties were evaluated for the Alternative R5 survey. Of these, three architectural properties were newly-documented and determined not eligible. An additional property—the Foster Residence at 15575 South US Highway 550—was assigned site number 5LP10844 and was initially identified as an architectural property with assessor information indicating there were several buildings on the parcel dating to 1949. However, a site visit revealed that the buildings are no longer extant and this property was determined not eligible. US Highway 160 (segment 5LP10654.1) was also newly documented; the entire highway is considered eligible but the segment lacks integrity and is non-supporting.

Four previously-recorded resources were documented on site forms as part of this survey effort. A segment of the Denver & Rio Grande Railroad (5LP1131.21) was evaluated; the entire railroad is considered eligible, but the segment lacks integrity and is non-supporting. Re-visitation forms were completed for Bridge/Railroad Ties (5LP7759) and Farm Equipment (5LP7874); the field survey indicates they are no longer extant and are not eligible. A segment of the Mason Lateral (5LP6695.1) was also documented, as discussed above.

The following table summarizes the eligibility determinations for the surveyed properties as well as previously documented archaeological sites. Additional information about these properties (minus the archaeological resources) is provided in the attached survey report.

Site Number	Address/Property Name	Construction Date	Eligibility Determination
5LP1131.21	Denver & Rio Grande Railroad segment	1881	Entire resource is eligible; Non-Supporting segment
5LP2223	Prehistoric archaeological site	N/A	Eligible
5LP6670	Prehistoric archaeological site	N/A	Eligible
5LP6695.1	Mason Lateral	1901	Entire ditch eligible; Supporting segment
5LP7759	Bridge/Railroad Ties	Unknown	No longer extant; Not Eligible
5LP7874	Farm Equipment	Circa 1930-1940	No longer extant; Not Eligible
5LP10844	15575 South US Highway 550; Foster residence	1949	Buildings no longer extant; Not Eligible
5LP10645	16073 S US Highway 550	1956	Not Eligible
5LP10646	27055 E US Highway 160	1958	Not Eligible
5LP10648	27653 E US Highway 160	1952	Not Eligible
5LP 10654.1	US Highway 160 segment	1916-1926, 1938	Entire highway eligible; Non Supporting segment

An additional ten previously-recorded properties are present within the APE, including another segment of the D&RG railroad (5LP1131.8), which is now represented by 5LP1131.21. As noted above, no additional archaeological survey was required and the two known archaeological sites were not re-visited; eligibility determinations for those properties remain unchanged and effects determinations for this alternative were made based on the new design plans.

The previously documented properties with official eligibility determinations were not re-evaluated on site forms, and are shown in the shaded area of the table below. These resources (minus the two archaeological sites) are also listed on p. 6, Table 1 of the enclosed survey report. The eligibility status of these properties was verified in the OAHP Compass database and dates of official determinations of eligibility are included. Based on the 2014 Section 106 Programmatic Agreement executed by our agencies, CDOT may rely on the previous determination for officially not eligible properties unless alterations warrant re-evaluation or the property was less than 50 years old when it was determined not eligible.

Effects determinations for newly documented and previously documented properties are summarized in the table below. There is also additional information for select properties below the table. Properties evaluated for the R5 Alternative are noted in the table and site forms for those resources are enclosed.

Effects Determinations

Site Number	Address/Property Name	Eligibility Determination	Effects Determination
5LP1131.21	Denver & Rio Grande Railroad segment	Entire resource is Eligible; Non-Supporting segment (R5 Survey)	Direct effect to 4,000 feet of the railroad due to new access road to gravel pit. No Adverse Effect; *see additional information below.
5LP2223	Prehistoric archaeological site	Officially Eligible, 2000	Adverse Effect
5LP6670	Prehistoric archaeological site	Officially Eligible, 2002	Adverse Effect
5LP5649	27561 US 160	Officially Not Eligible, 2000	No Historic Properties Affected
5LP5650	26796 US 160	Officially Not Eligible, 2000	No Historic Properties Affected
5LP5651	26796 US 160	Officially Not Eligible, 2000	No Historic Properties Affected
5LP6632—segments 5LP6632.4, 5LP6632.5, 5LP6632.6	Aztec to Durango Road	Entire road Officially Not Eligible 2002; segments Field Not Eligible	No Historic Properties Affected
5LP6654.1	US Highway 550 Segment	Entire segment Officially Not Eligible, 2011	No Historic Properties Affected
5LP6669	Trash Dump	Officially Not Eligible, 2002	No Historic Properties Affected
5LP6695.1	Mason Lateral (formerly Co-op Ditch)	Eligible, supporting segment (R5 Survey)	Within APE but outside the area of improvements; No Historic Properties Affected
5LP7759	Bridge, railroad ties	Not Eligible—no longer extant (R5 Survey)	No Historic Properties Affected
5LP7873	Corral	Officially Not Eligible, 2005	No Historic Properties Affected
5LP7874	Farm Equipment	Field Not Eligible—no longer extant (R5 Survey)	No Historic Properties Affected
5LP8461	Webb Ranch	Officially Eligible, 2010	Direct effect to 5.2 acres of ranch along western edge, Adverse Effect
5LP8911	Denver & Rio Grande Railroad Trestle—Farmington Branch	Officially Eligible, 2009	Trestle is within the broader APE but will not be affected. No Historic Properties Affected.
5LP9307	Craig Ranch and Hollywood Dairy, Craig Limousin Ranch	Officially Eligible, 2010	Direct effect to 6.9 acres of ranch along western edge, Adverse Effect
5LP10645	16073 S US Highway 550	Not Eligible (R5 Survey)	ROW includes 1 acre north of US 550, 5.9 acres south of US 550, and removal of all buildings on property. No Historic Properties Affected
5LP10646	27055 E US Highway 160	Not Eligible (R5 Survey)	Change to access. No Historic Properties Affected
5LP10648	27653 E US Highway 160	Not Eligible (R5 Survey)	Effects to 1.9 acres of the property for gravel pit

Site Number	Address/Property Name	Eligibility Determination	Effects Determination
			access. This total includes both easements and ROW. No Historic Properties Affected.
5LP 10654.1	US Highway 160 segment	Entire highway Eligible; Non Supporting segment (R5 Survey)	Widening to 20 feet for auxiliary lanes for new ramps. Replacement of Concrete Box Culvert. No Adverse Effect; *see additional information below.
5LP10844	15575 South US Highway 550	Vacant Parcel, Not Eligible (R5 Survey)	No Historic Properties Affected; *see additional information below.

Denver & Rio Grande Railroad (5LP1131.21): The overall railroad is eligible but segment 5LP1131.21 lacks integrity. The railroad is located north of US Highway 160. Currently, parts of the former railroad segment are being used as an access to an existing gravel pit operation. Access to the gravel pit would be affected by construction of the interchange under the R5 Alternative. The new proposed access road to the gravel pit would directly affect 4,000 ft. of the railroad segment. Because the segment lacks integrity, there is a finding of *no adverse effect*.

Webb Ranch (5LP8461): There would be a direct effect to the Webb Ranch as the new highway alignment extends along the western edge of the boundary. Although the buildings would be avoided, the highway represents a new visual element in the ranch setting and will compromise the feeling, setting, and association of the property. A total of 5.2 acres along the western property boundary would be required. CDOT has determined that this alternative results in an *adverse effect*.

Craig Ranch (5LP9307): US 550 would be widened from two to four lanes along the historic ranch boundary and the alternative would require 6.9 acres along the western property boundary from County Road 220 and south along the US 550 alignment as noted in the attached graphic of R5 (Exhibit 7-8). No ranch buildings would be directly affected by the acquisition but open ranch land along the western property boundary would be acquired. These effects diminish the setting, feeling, and association of the ranch. Based on this, CDOT has determined that Alternative R5 results in an *adverse effect* to the Craig Limousin Ranch.

US Highway 160 (5LP10654.1): The entire highway is eligible but the segment in the project area is not supporting. The highway would be widened a total of 20 feet for acceleration/deceleration lanes. An existing concrete box culvert under the highway at Wilson Gulch would be replaced with a bridge to accommodate a wildlife crossing, but this will be within existing highway right of way. Because the segment is non-supporting, the alternative results in *no adverse effect*.

Property at 15575 South US Highway 550 (5LP10844): This property is located west of US Highway 550 and was initially identified as a residential property. La Plata County assessor information indicates there is a residence and two sheds dating to 1949 on the parcel; however a site visit revealed that no buildings are present. Because there are no longer any buildings on the property, it is considered not eligible. An aerial photo showing the building that was once on the parcel is included herewith, along with a photo of the current property. The alternative results in *no historic properties affected*.

3. Alternative RGM6 (Preferred Alternative)

Alternative Description: This alternative is a refinement of Revised G Modified, which was identified as the Preferred Alternative in the SFEIS; Revised G Modified was enhanced during the 2014 Independent Alternatives Analysis and renamed Revised G Modified 6 (RGM6). It connects US 550 to US 160 via the

existing Grandview Interchange, and includes two through lanes in each direction through the Grandview Section of US 160. Further refinement shifted the alternative to the west to avoid more of the irrigated farmland of the Webb Ranch (5LP8461) and thereby reduce impacts to that historic property. For more information refer to Exhibit 7-10. A graphic showing the Revised G Modified alternative (Exhibit 7-9) is included for comparative purposes.

Area of Potential Effects: The APE for this alternative includes the project footprint plus the parcels directly affected by the alternative, as noted on the attached APE map.

Eligibility Determinations: Properties affected by this alternative were identified during the 2009-2011 consultations for Revised G Modified, and include the officially eligible historic Webb Ranch (5LP8461) and Craig Ranch (5LP9307), as well as properties south of County Road 220 and west of US 550 that were recently identified as part of the Alternative R5 survey noted above. Because the status of the previously documented properties (Webb Ranch, Craig Ranch, the US 550 segment, and five archaeological sites) has not changed, new site forms were not completed. Some properties that were identified in the Alternative R5 survey will also be affected by RGM6; these are noted in the following table, which includes properties within the APE for Alternative RGM6:

Site Number	Address/Property Name	Construction Date	Eligibility Determination
5LP2223	Prehistoric archaeological site	N/A	Eligible
5LP6654.1	US Highway 550	1924-1934	Officially Not Eligible, 2011
5LP6670	Prehistoric archaeological site	N/A	Eligible
5LP6695.1	Mason Lateral (formerly Co-op Ditch)	1901	Eligible, supporting segment (R5 Survey)
5LP8461	Webb Ranch		Officially Eligible, 2010
5LP8911	Denver & Rio Grande Railroad Trestle-Farmington Branch		Officially Eligible, 2009
5LP9307	Craig Ranch		Officially Eligible, 2010
5LP9587	Prehistoric archaeological site	N/A	Eligible
5LP9588	Prehistoric archaeological site	N/A	Eligible
5LP9590	Prehistoric archaeological site	N/A	Eligible
5LP10844	15575 South US Highway 550	1949	No buildings on property, Not Eligible
5LP10645	16073 S US Highway 550	1956	Not Eligible (R5 Survey)
5LP 10654.1	US Highway 160 segment	1916-1926, 1938	Entire highway Eligible; Non-Supporting segment (R5 Survey)

Effects Determinations

Site Number	Address/Property Name	Eligibility Determination	Effects Determination
5LP2223	Prehistoric archaeological site	Officially Eligible, 2000	Adverse Effect
5LP6654.1	US Highway 550	Officially Not Eligible, 2011	No Historic Properties Affected
5LP6670	Prehistoric archaeological site	Officially Eligible, 2002	Adverse Effect
5LP6695.1	Mason Lateral (formerly Co-op Ditch)	Eligible, supporting segment (R5 Survey)	Ditch will not be affected. No Historic Properties Affected.
5LP8461	Webb Ranch	Officially Eligible, 2010	Direct effect to 31.8 acres along west edge, Adverse Effect. *See additional information below
5LP8911	Denver & Rio Grande Railroad Trestle—Farmington Branch	Officially Eligible, 2009	Within APE but located on far western edge. Will not be directly or indirectly

Site Number	Address/Property Name	Eligibility Determination	Effects Determination
			affected; No Historic Properties Affected
5LP9307	Craig Ranch	Officially Eligible, 2010	Direct effect to 12.6 acres of ranch along western edge; Adverse Effect. *See additional information below
5LP9587	Prehistoric archaeological site	Officially Eligible, 2010	Adverse Effect
5LP9588	Prehistoric archaeological site	Officially Eligible, 2010	Adverse Effect
5LP9590	Prehistoric archaeological site	Officially Eligible, 2010	Adverse Effect
5LP10844	15575 South US Highway 550	Vacant Parcel, Not Eligible (R5 survey)	No Historic Properties Affected, *See additional information below.
5LP10645	16073 S US Highway 550	Not Eligible (R5 Survey)	1.88 acres of impact north of US 550. 1.0 acre of impact south of US 550. No historic properties affected
5LP 10654.1	US Highway 160 segment	Entire highway eligible; Non Supporting segment (R5 Survey)	Replacement of concrete box culvert at Wilson Gulch within right of way. No Adverse Effect. *See additional information below

Webb Ranch (5LP8461): There will be a direct effect to the Webb Ranch as the new highway alignment extends along the western edge of the boundary. Although the buildings will be avoided, the highway represents a new visual element in the ranch setting and will compromise the feeling, setting and association of the property. A total of 31.8 acres along the western property boundary will be required. CDOT has determined that this alternative results in an *adverse effect*.

Craig Ranch (5LP9307): US 550 will be widened from two to four lanes along the historic ranch boundary and the alternative will require 12.6 acres along the western property boundary from County Road 220 and south along the US 550 alignment as noted in the attached graphic of RGM6. No ranch buildings will be directly affected by the acquisition but open ranch land along the western property boundary will be acquired and the widened US 550 alignment will be closer to the ranch buildings. These effects diminish the setting, feeling and association of the ranch. Based on this, CDOT has determined that Alternative RGM6 results in an *adverse effect* to the Craig Limousin Ranch.

US Highway 160 (5LP10654.1): The entire highway is eligible but the segment in the project area is not supporting. An existing concrete box culvert under the highway at Wilson Gulch will be replaced with a bridge to accommodate a wildlife crossing, but this will be within existing highway right of way. Because the segment is non-supporting, the alternative results in *no adverse effect*.

Property at 15575 South US Highway 55 (5LP10844): This property is located west of US Highway 550 and was assigned a site number. La Plata County assessor information indicates there is a residence and two sheds dating to 1949 on the parcel; however a site visit revealed that there are no buildings present. Because there are no longer any buildings on the property, it is considered not eligible. A map of the property showing the building that was once on the parcel is included along with a photo of its

present condition. The property is not eligible so the alternative results in a finding of *no historic properties affected*.

4. Revised G Modified Alternative

Alternative Description: As noted above, this alternative was identified as Preferred in the SFEIS; however, it has been re-designed as RGM6, which is the new Preferred Alternative. In the 2010 consultation for this alternative there were some properties south of County Road 220 and west of US Highway 550 that were not assessed for effects. Some of these properties were recently evaluated during the survey for Alternative R5, and those site forms are part of this submittal. Only properties that weren't addressed in previous consultation or that required updates to effects information are included in this section, including archaeological sites 5LP6670, 5LP9588, 5LP9589 and 5LP9590. This alternative connects US Highway 550 to US Highway 160 via the Grandview Interchange and includes two through lanes in each direction. Please see Exhibit 7-9 for more information about the alternative.

Effects Determinations

Site Number	Address/Property Name	Eligibility Determination	Effect Determination
5LP1131.21	Denver & Rio Grande Railroad	Eligible (R5 Survey)	All improvements are south of US 160 so there are no effects. No Historic Properties Affected.
5LP6695.1	Mason Lateral (formerly Co-op Ditch)	Entire ditch eligible; supporting segment	Ditch is located south of improvements. No historic properties affected. *See additional information below
5LP8461	Webb Ranch	Officially Eligible, 2010	Direct effect to 41.5 acres of land; Adverse Effect. *See additional information below
5LP9307	Craig Limousin Ranch	Officially Eligible, 2010	Direct effect to 3.43 acres, Adverse Effect. *See additional information below
5LP10844	15575 South US Highway 550	Vacant Parcel, Not Eligible (R5 Survey)	No Historic Properties Affected. *See additional information below.
5LP10645	16073 S US Highway 550	Not Eligible (R5 Survey)	This alternative directly affects 0.13 acres. No historic properties affected
5LP 10654.1	US Highway 160 segment	Entire highway Eligible; Non Supporting segment (R5 Survey)	Replacement of concrete box culvert at Wilson Gulch within right of way; No Adverse Effect. *See additional information below.

Mason Lateral (5LP6695.1): As noted earlier, the Mason Lateral segment (formerly the Co-op Ditch) was evaluated for effects from Revised G Modified in 2010 and was found to result in a direct effect to 488 feet of the ditch. This effect was based on a common termini that was identified for alternatives evaluated in the Section 4(f) evaluation. This common termini was applied erroneously to the effect determinations under Section 106. Without the common termini, the ditch segment is south of where the improvements for Revised G Modified would end, and there would be no effect to the ditch, resulting in a finding of *no historic properties affected* for Revised G Modified for this resource.

US Highway 160 (5LP10654.1): The entire highway is eligible but the segment in the project area is not supporting. An existing concrete box culvert under the highway at Wilson Gulch will be replaced with a bridge to accommodate a wildlife crossing, but this will be within existing highway right of way. Because the segment is non-supporting, the alternative results in *no adverse effect*.

Property at 15575 South US Highway 55 (5LP10844): This property is located west of US Highway 550. La Plata County assessor information indicates there is a residence and two sheds dating to 1949 on the parcel; however a site visit revealed that there are no buildings on the property. Because there are no longer any buildings on the property, it is considered not eligible, which results in a finding of *no historic properties affected*.

Webb Ranch (5LP8461): In the 2010 consultation for this property under Revised G Modified, CDOT determined there would be an adverse effect based on the construction of a new highway alignment through the ranch and its effects on the setting, feeling, and association of the property. The acreage of the impact was not included in that consultation letter so this submittal clarifies that approximately 41.5 acres of ROW is needed from the ranch. None of the buildings would be affected by this alternative. There is still an *adverse effect* to this property based on this updated effect information.

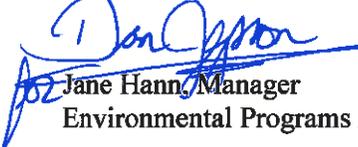
Craig Limousin Ranch (5LP9307): In the 2010 consultation for this property under Revised G Modified, CDOT determined that there would be a direct effect to 22.7 acres of the ranch on its western boundary, resulting in an adverse effect. This evaluation was based on a common termini for the alternatives evaluated in the Section 4(f) evaluation. This common termini was erroneously applied to the effects determination for the Craig Ranch for Alternative Revised G Modified in the December 2010 consultation. Without the common termini, the effect to the ranch would consist of 3.43 acres. There is still an *adverse effect* to this property based on this updated effect information.

It is the judgment of the Federal Highway Administration and CDOT that all the NRHP eligible archaeological sites listed herein or otherwise part of the previous consultation process for the US 550/160 undertaking are significant chiefly because of what can be learned by data recovery, and therefore they have minimal value for preservation in place. As a result, none of those localities qualify for preservation under Section 4(f) of the US Department of Transportation Act of 1966, as codified in 23 CFR 774.13(b)(1&2).

This information has been forwarded concurrently to the consulting parties for the project. We will provide you with any responses received.

We request your concurrence with these determinations of eligibility and effects. Please contact CDOT Senior Staff Historian Lisa Schoch at (303) 512-4258 or lisa.schoch@state.co.us, or Senior Staff Archaeologist Dan Jepson at (303) 757-9631 or daniel.jepson@state.co.us, if you have questions or require additional information.

Very truly yours,


Jane Hann, Manager
Environmental Programs Branch

Enclosures Survey Report and Site Forms for Alternative R5
 Exhibits 7-8, 7-9 & 7-10
 APE map, RGM6
 Individual Site Forms (5LP6695.1, 5LP7759, 5LP7874)
 Revised APE map for R5

cc: Tony Cady, CDOT Region 5



COLORADO

Department of Transportation

Division of Transportation Development

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Shumate Building
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January 20, 2015

Ms. Peggy Cooley
1525 Cliff Drive
Santa Barbara, CA 93109-1733

Subject: Determinations of Eligibility and Effects, Alternatives R5 and RGM6, US Highway 550 South Connection to US Highway 160, La Plata County

Dear Ms. Cooley:

This letter and the attached materials constitute a request for comments on determinations of eligibility and effects for the project referenced above. We previously conducted Section 106 consultation regarding eligibility and effects for various alternatives between 2009 and 2011. A consulting party meeting was held in Durango in November 2011 and a Memorandum of Agreement (MOA) was executed in 2012. The Section 106 process was documented in the 2012 US 550 South Connection to US 160 Supplemental Final Environmental Impact Statement (SFEIS)/Section 4(f) Evaluation for the US Highway 160 from Durango to Bayfield EIS. In response to public comment and in an effort to be unbiased and transparent regarding the alternatives, CDOT commissioned an in-depth analysis to evaluate the best alternative to connect US 550 from south of County Road 220 north to US 160. This Independent Alternatives Analysis (IAA) was completed by a consultant team including AMEC Environment and Infrastructure, Muller Engineering Company, and other specialty consultants.

As a result of the IAA, a new preferred alternative has been identified (RGM6). This submittal includes the following updates to historic properties:

1. Updated information about the historic background of the Co-op Ditch segment 5LP9257.2.
2. Alternative R5—Eligibility and Effects. New Alternative R5 was developed and additional survey was completed by consultant HDR to address new properties west of US Highway 550. Note that additional survey for archaeological resources was not completed for this or the other newly designed alternative (RGM6), as all areas proposed for direct effects were either previously inventoried or located on steep, highly eroded slopes that preclude the presence of intact archaeological remains.
3. Alternative RGM6—Eligibility and Effects Determinations. The Preferred Alternative (Revised G Modified) identified in the 2012 SFEIS has been re-designed as Alternative RGM6. The resource base for Alternative RGM6 largely matches that of Revised G Modified, but updated effects determinations have been developed to address the differences between the two.
4. Alternative Revised G Modified—updated Eligibility and Effects Determinations. The Revised G Modified alternative was identified as the preferred alternative in the SFEIS. It has been determined that properties west of US Highway 550 would be affected by Revised G Modified,

but these effects were not discussed in the 2010 consultation for that alternative. This update also includes revisions to the effects information for the historic Webb and Craig Ranches.

1. Clarification, Mason Lateral

In the consultation for the Eastern Realignment Alternative in November 2009, CDOT identified the Co-op Ditch under site number 5LP9257, with two segments evaluated (5LP9257.1 and 5LP9257.2). The ditch was also addressed in the analysis for the Revised F Modified and Revised G Alternatives in December 2010. For all of the previous consultation efforts, there was a finding of *no adverse effect*. Additional research has found that segment 5LP9257.2 south of County Road 220 is actually the Mason Lateral, which has a slightly different history, but maintains the location of the ditch identified as the Co-op Ditch in the 2009 consultation. The site number assigned to the Mason Lateral in 2002—5LP6695.1—has been assigned to this ditch and a new set of site forms is attached.

The former Co-op Ditch (5LP9752.2) was included in the evaluation of effects for Revised G Modified in 2010. The previous consultations indicated that 488 feet of the ditch would be affected as a result of widening the highway from two to four lanes. This effect was based on a common termini developed for alternatives evaluated in the Section 4(f) evaluation. This common termini was applied erroneously to the effects determinations under Section 106. Without the common termini, the ditch segment is south of where the improvements for Revised G Modified would end, and there would be no effect to the ditch, resulting in a finding of *no historic properties affected* for Revised G Modified for this resource. See the attached graphic showing the Revised G Modified alternative for more information about its location relative to the Mason Lateral.

2. Alternative R5

Alternative Description: Alternative R5 is a design variation of Alternative R submitted to CDOT during the public comment period for the 2012 SFEIS. It was modified during the 2014 IAA to meet a higher design speed and deviates from US 550 to meet that criterion. Alternative R5 includes a modified diamond interchange with US Highway 160. See Exhibit 7-8 for more information about the location of this alternative.

Survey Report Corrections: Please note that there are some handwritten corrections in the attached survey report that reflect new information collected after the report was printed. A list of page numbers and a description of the revised content follow:

pp. 26 (Table 3), 45 (Table 4), 46 (Table 5): The report indicates that the Foster property is being treated as NRHP eligible; however, after the report was finalized a field visit revealed that there are no longer any buildings on the property to evaluate and the property is therefore *not eligible*.

p. 46 (Table 4): Denver & Rio Grande Railroad (5LP1131.21): The entire railroad is considered eligible. The documented segment is non-supporting.

pp. 6 (Table 1), 19 (Table 2), 45 (Table 4), 46 (Table 5): The Office of Archaeology and Historic Preservation (OAHP) Compass database indicates that US Highway 550/State Highway 19 (5LP6654) is field eligible. It is not officially eligible as noted in the tables. US Highway 160 (5LP10654) was just evaluated as part of the survey for the R5 Alternative and is considered eligible. It is not officially eligible as noted in the table.

Area of Potential Effects: The APE for this survey was based on design parameters of proposed Alternative R5 and to address the potential for direct and indirect effects to historic properties. The APE boundary encompasses the alternative footprint as well as adjacent parcel boundaries and topographic features. For more information about the APE for Alternative R5, please see pp. 3-4 of the enclosed report as well as the updated map, which shows the APE boundary extending south to include the entire historic property boundary of the Craig Ranch.

Eligibility Determinations: Eleven properties were evaluated for the Alternative R5 survey. Of these, three architectural properties were newly-documented and determined not eligible. An additional property—the Foster Residence at 15575 South US Highway 550—was assigned site number 5LP10844 and was initially identified as an architectural property with assessor information indicating there were several buildings on the parcel dating to 1949. However, a site visit revealed that the buildings are no longer extant and this property was determined not eligible. US Highway 160 (segment 5LP10654.1) was also newly documented; the entire highway is considered eligible but the segment lacks integrity and is non-supporting.

Four previously-recorded resources were documented on site forms as part of this survey effort. A segment of the Denver & Rio Grande Railroad (5LP1131.21) was evaluated; the entire railroad is considered eligible, but the segment lacks integrity and is non-supporting. Re-visitation forms were completed for Bridge/Railroad Ties (5LP7759) and Farm Equipment (5LP7874); the field survey indicates they are no longer extant and are not eligible. A segment of the Mason Lateral (5LP6695.1) was also documented, as discussed above.

The following table summarizes the eligibility determinations for the surveyed properties as well as previously documented archaeological sites. Additional information about these properties (minus the archaeological resources) is provided in the attached survey report.

Site Number	Address/Property Name	Construction Date	Eligibility Determination
5LP1131.21	Denver & Rio Grande Railroad segment	1881	Entire resource is eligible; Non-Supporting segment
5LP2223	Prehistoric archaeological site	N/A	Eligible
5LP6670	Prehistoric archaeological site	N/A	Eligible
5LP6695.1	Mason Lateral	1901	Entire ditch eligible; Supporting segment
5LP7759	Bridge/Railroad Ties	Unknown	No longer extant; Not Eligible
5LP7874	Farm Equipment	Circa 1930-1940	No longer extant; Not Eligible
5LP10844	15575 South US Highway 550; Foster residence	1949	Buildings no longer extant; Not Eligible
5LP10645	16073 S US Highway 550	1956	Not Eligible
5LP10646	27055 E US Highway 160	1958	Not Eligible
5LP10648	27653 E US Highway 160	1952	Not Eligible
5LP 10654.1	US Highway 160 segment	1916-1926, 1938	Entire highway eligible; Non Supporting segment

An additional ten previously-recorded properties are present within the APE, including another segment of the D&RG railroad (5LP1131.8), which is now represented by 5LP1131.21. As noted above, no additional archaeological survey was required and the two known archaeological sites were not re-visited; eligibility determinations for those properties remain unchanged and effects determinations for this alternative were made based on the new design plans.

The previously documented properties with official eligibility determinations were not re-evaluated on site forms, and are shown in the shaded area of the table below. These resources (minus the two archaeological sites) are also listed on p. 6, Table 1 of the enclosed survey report. The eligibility status of these properties was verified in the OAHIP Compass database and dates of official determinations of eligibility are included. Based on the 2014 Section 106 Programmatic Agreement executed by CDOT, the State Historic Preservation Officer (SHPO), the Federal Highway Administration (FHWA), and the Advisory Council on Historic Preservation (ACHP), CDOT may rely on the previous determination for officially not eligible properties unless alterations warrant re-evaluation or the property was less than 50 years old when it was determined not eligible.

Effects determinations for newly documented and previously documented properties are summarized in the table below. There is also additional information for select properties below the table. Properties evaluated for the R5 Alternative are noted in the table and site forms for those resources are enclosed.

Effects Determinations

Site Number	Address/Property Name	Eligibility Determination	Effects Determination
5LP1131.21	Denver & Rio Grande Railroad segment	Entire resource is Eligible; Non-Supporting segment (R5 Survey)	Direct effect to 4,000 feet of the railroad due to new access road to gravel pit. No Adverse Effect; *see additional information below.
5LP2223	Prehistoric archaeological site	Officially Eligible, 2000	Adverse Effect
5LP6670	Prehistoric archaeological site	Officially Eligible, 2002	Adverse Effect
5LP5649	27561 US 160	Officially Not Eligible, 2000	No Historic Properties Affected
5LP5650	26796 US 160	Officially Not Eligible, 2000	No Historic Properties Affected
5LP5651	26796 US 160	Officially Not Eligible, 2000	No Historic Properties Affected
5LP6632—segments 5LP6632.4, 5LP6632.5, 5LP6632.6	Aztec to Durango Road	Entire road Officially Not Eligible 2002; segments Field Not Eligible	No Historic Properties Affected
5LP6654.1	US Highway 550 Segment	Entire segment Officially Not Eligible, 2011	No Historic Properties Affected
5LP6669	Trash Dump	Officially Not Eligible, 2002	No Historic Properties Affected
5LP6695.1	Mason Lateral (formerly Co-op Ditch)	Eligible, supporting segment (R5 Survey)	Within APE but outside the area of improvements; No Historic Properties Affected
5LP7759	Bridge, railroad ties	Not Eligible—no longer extant (R5 Survey)	No Historic Properties Affected
5LP7873	Corral	Officially Not Eligible, 2005	No Historic Properties Affected
5LP7874	Farm Equipment	Field Not Eligible—no longer extant (R5 Survey)	No Historic Properties Affected
5LP8461	Webb Ranch	Officially Eligible, 2010	Direct effect to 5.2 acres of ranch along western edge, Adverse Effect
5LP8911	Denver & Rio Grande Railroad Trestle—Farmington Branch	Officially Eligible, 2009	Trestle is within the broader APE but will not be affected. No Historic Properties Affected.
5LP9307	Craig Ranch and Hollywood Dairy, Craig Limousin Ranch	Officially Eligible, 2010	Direct effect to 6.9 acres of ranch along western edge, Adverse Effect
5LP10645	16073 S US Highway 550	Not Eligible (R5 Survey)	ROW includes 1 acre north of US 550, 5.9 acres south of US 550, and removal of all buildings on property. No Historic Properties Affected
5LP10646	27055 E US Highway 160	Not Eligible (R5 Survey)	Change to access. No Historic Properties Affected
5LP10648	27653 E US Highway 160	Not Eligible (R5 Survey)	Effects to 1.9 acres of the property for gravel pit

Site Number	Address/Property Name	Eligibility Determination	Effects Determination
			access. This total includes both easements and ROW. No Historic Properties Affected.
5LP 10654.1	US Highway 160 segment	Entire highway Eligible; Non Supporting segment (R5 Survey)	Widening to 20 feet for auxiliary lanes for new ramps. Replacement of Concrete Box Culvert. No Adverse Effect; *see additional information below.
5LP10844	15575 South US Highway 550	Vacant Parcel, Not Eligible (R5 Survey)	No Historic Properties Affected; *see additional information below.

Denver & Rio Grande Railroad (5LP1131.21): The overall railroad is eligible but segment 5LP1131.21 lacks integrity. The railroad is located north of US Highway 160. Currently, parts of the former railroad segment are being used as an access to an existing gravel pit operation. Access to the gravel pit would be affected by construction of the interchange under the R5 Alternative. The new proposed access road to the gravel pit would directly affect 4,000 ft. of the railroad segment. Because the segment lacks integrity, there is a finding of *no adverse effect*.

Webb Ranch (5LP8461): There would be a direct effect to the Webb Ranch as the new highway alignment extends along the western edge of the boundary. Although the buildings would be avoided, the highway represents a new visual element in the ranch setting and will compromise the feeling, setting, and association of the property. A total of 5.2 acres along the western property boundary would be required. CDOT has determined that this alternative results in an *adverse effect*.

Craig Ranch (5LP9307): US 550 would be widened from two to four lanes along the historic ranch boundary and the alternative would require 6.9 acres along the western property boundary from County Road 220 and south along the US 550 alignment as noted in the attached graphic of R5 (Exhibit 7-8). No ranch buildings would be directly affected by the acquisition but open ranch land along the western property boundary would be acquired. These effects diminish the setting, feeling, and association of the ranch. Based on this, CDOT has determined that Alternative R5 results in an *adverse effect* to the Craig Limousin Ranch.

US Highway 160 (5LP10654.1): The entire highway is eligible but the segment in the project area is not supporting. The highway would be widened a total of 20 feet for acceleration/deceleration lanes. An existing concrete box culvert under the highway at Wilson Gulch would be replaced with a bridge to accommodate a wildlife crossing, but this will be within existing highway right of way. Because the segment is non-supporting, the alternative results in *no adverse effect*.

Property at 15575 South US Highway 550 (5LP10844): This property is located west of US Highway 550 and was initially identified as a residential property. La Plata County assessor information indicates there is a residence and two sheds dating to 1949 on the parcel; however a site visit revealed that no buildings are present. Because there are no longer any buildings on the property, it is considered not eligible. An aerial photo showing the building that was once on the parcel is included herewith, along with a photo of the current property. The alternative results in *no historic properties affected*.

3. Alternative RGM6 (Preferred Alternative)

Alternative Description: This alternative is a refinement of Revised G Modified, which was identified as the Preferred Alternative in the SFEIS; Revised G Modified was enhanced during the 2014 Independent Alternatives Analysis and renamed Revised G Modified 6 (RGM6). It connects US 550 to US 160 via the

existing Grandview Interchange, and includes two through lanes in each direction through the Grandview Section of US 160. Further refinement shifted the alternative to the west to avoid more of the irrigated farmland of the Webb Ranch (5LP8461) and thereby reduce impacts to that historic property. For more information refer to Exhibit 7-10. A graphic showing the Revised G Modified alternative (Exhibit 7-9) is included for comparative purposes.

Area of Potential Effects: The APE for this alternative includes the project footprint plus the parcels directly affected by the alternative, as noted on the attached APE map.

Eligibility Determinations: Properties affected by this alternative were identified during the 2009-2011 consultations for Revised G Modified, and include the officially eligible historic Webb Ranch (5LP8461) and Craig Ranch (5LP9307), as well as properties south of County Road 220 and west of US 550 that were recently identified as part of the Alternative R5 survey noted above. Because the status of the previously documented properties (Webb Ranch, Craig Ranch, the US 550 segment, and five archaeological sites) has not changed, new site forms were not completed. Some properties that were identified in the Alternative R5 survey will also be affected by RGM6; these are noted in the following table, which includes properties within the APE for Alternative RGM6:

Site Number	Address/Property Name	Construction Date	Eligibility Determination
5LP2223	Prehistoric archaeological site	N/A	Eligible
5LP6654.1	US Highway 550	1924-1934	Officially Not Eligible, 2011
5LP6670	Prehistoric archaeological site	N/A	Eligible
5LP6695.1	Mason Lateral (formerly Co-op Ditch)	1901	Eligible, supporting segment (R5 Survey)
5LP8461	Webb Ranch		Officially Eligible, 2010
5LP8911	Denver & Rio Grande Railroad Trestle-Farmington Branch		Officially Eligible, 2009
5LP9307	Craig Ranch		Officially Eligible, 2010
5LP9587	Prehistoric archaeological site	N/A	Eligible
5LP9588	Prehistoric archaeological site	N/A	Eligible
5LP9590	Prehistoric archaeological site	N/A	Eligible
5LP10844	15575 South US Highway 550	1949	No buildings on property, Not Eligible
5LP10645	16073 S US Highway 550	1956	Not Eligible (R5 Survey)
5LP 10654.1	US Highway 160 segment	1916-1926, 1938	Entire highway Eligible; Non-Supporting segment (R5 Survey)

Effects Determinations

Site Number	Address/Property Name	Eligibility Determination	Effects Determination
5LP2223	Prehistoric archaeological site	Officially Eligible, 2000	Adverse Effect
5LP6654.1	US Highway 550	Officially Not Eligible, 2011	No Historic Properties Affected
5LP6670	Prehistoric archaeological site	Officially Eligible, 2002	Adverse Effect
5LP6695.1	Mason Lateral (formerly Co-op Ditch)	Eligible, supporting segment (R5 Survey)	Ditch will not be affected. No Historic Properties Affected.
5LP8461	Webb Ranch	Officially Eligible, 2010	Direct effect to 31.8 acres along west edge, Adverse Effect. *See additional information below
5LP8911	Denver & Rio Grande Railroad Trestle—Farmington Branch	Officially Eligible, 2009	Within APE but located on far western edge. Will not be directly or indirectly

Site Number	Address/Property Name	Eligibility Determination	Effects Determination
			affected; No Historic Properties Affected
5LP9307	Craig Ranch	Officially Eligible, 2010	Direct effect to 12.6 acres of ranch along western edge; Adverse Effect. *See additional information below
5LP9587	Prehistoric archaeological site	Officially Eligible, 2010	Adverse Effect
5LP9588	Prehistoric archaeological site	Officially Eligible, 2010	Adverse Effect
5LP9590	Prehistoric archaeological site	Officially Eligible, 2010	Adverse Effect
5LP10844	15575 South US Highway 550	Vacant Parcel, Not Eligible (R5 survey)	No Historic Properties Affected, *See additional information below.
5LP10645	16073 S US Highway 550	Not Eligible (R5 Survey)	1.88 acres of impact north of US 550. 1.0 acre of impact south of US 550. No historic properties affected
5LP 10654.1	US Highway 160 segment	Entire highway eligible; Non Supporting segment (R5 Survey)	Replacement of concrete box culvert at Wilson Gulch within right of way. No Adverse Effect. *See additional information below

Webb Ranch (5LP8461): There will be a direct effect to the Webb Ranch as the new highway alignment extends along the western edge of the boundary. Although the buildings will be avoided, the highway represents a new visual element in the ranch setting and will compromise the feeling, setting and association of the property. A total of 31.8 acres along the western property boundary will be required. CDOT has determined that this alternative results in an *adverse effect*.

Craig Ranch (5LP9307): US 550 will be widened from two to four lanes along the historic ranch boundary and the alternative will require 12.6 acres along the western property boundary from County Road 220 and south along the US 550 alignment as noted in the attached graphic of RGM6. No ranch buildings will be directly affected by the acquisition but open ranch land along the western property boundary will be acquired and the widened US 550 alignment will be closer to the ranch buildings. These effects diminish the setting, feeling and association of the ranch. Based on this, CDOT has determined that Alternative RGM6 results in an *adverse effect* to the Craig Limousin Ranch.

US Highway 160 (5LP10654.1): The entire highway is eligible but the segment in the project area is not supporting. An existing concrete box culvert under the highway at Wilson Gulch will be replaced with a bridge to accommodate a wildlife crossing, but this will be within existing highway right of way. Because the segment is non-supporting, the alternative results in *no adverse effect*.

Property at 15575 South US Highway 55 (5LP10844): This property is located west of US Highway 550 and was assigned a site number. La Plata County assessor information indicates there is a residence and two sheds dating to 1949 on the parcel; however a site visit revealed that there are no buildings present. Because there are no longer any buildings on the property, it is considered not eligible. A map of the property showing the building that was once on the parcel is included along with a photo of its

present condition. The property is not eligible so the alternative results in a finding of *no historic properties affected*.

4. Revised G Modified Alternative

Alternative Description: As noted above, this alternative was identified as Preferred in the SFEIS; however, it has been re-designed as RGM6, which is the new Preferred Alternative. In the 2010 consultation for this alternative there were some properties south of County Road 220 and west of US Highway 550 that were not assessed for effects. Some of these properties were recently evaluated during the survey for Alternative R5, and those site forms are part of this submittal. Only properties that weren't addressed in previous consultation or that required updates to effects information are included in this section, including archaeological sites 5LP6670, 5LP9588, 5LP9589 and 5LP9590. This alternative connects US Highway 550 to US Highway 160 via the Grandview Interchange and includes two through lanes in each direction. Please see Exhibit 7-9 for more information about the alternative.

Effects Determinations

Site Number	Address/Property Name	Eligibility Determination	Effect Determination
5LP1131.21	Denver & Rio Grande Railroad	Eligible (R5 Survey)	All improvements are south of US 160 so there are no effects. No Historic Properties Affected.
5LP6695.1	Mason Lateral (formerly Co-op Ditch)	Entire ditch eligible; supporting segment	Ditch is located south of improvements. No historic properties affected. *See additional information below
5LP8461	Webb Ranch	Officially Eligible, 2010	Direct effect to 41.5 acres of land; Adverse Effect. *See additional information below
5LP9307	Craig Limousin Ranch	Officially Eligible, 2010	Direct effect to 3.43 acres, Adverse Effect. *See additional information below
5LP10844	15575 South US Highway 550	Vacant Parcel, Not Eligible (R5 Survey)	No Historic Properties Affected. *See additional information below.
5LP10645	16073 S US Highway 550	Not Eligible (R5 Survey)	This alternative directly affects 0.13 acres. No historic properties affected
5LP 10654.1	US Highway 160 segment	Entire highway Eligible; Non Supporting segment (R5 Survey)	Replacement of concrete box culvert at Wilson Gulch within right of way; No Adverse Effect. *See additional information below.

Mason Lateral (5LP6695.1): As noted earlier, the Mason Lateral segment (formerly the Co-op Ditch) was evaluated for effects from Revised G Modified in 2010 and was found to result in a direct effect to 488 feet of the ditch. This effect was based on a common termini that was identified for alternatives evaluated in the Section 4(f) evaluation. This common termini was applied erroneously to the effect determinations under Section 106. Without the common termini, the ditch segment is south of where the improvements for Revised G Modified would end, and there would be no effect to the ditch, resulting in a finding of *no historic properties affected* for Revised G Modified for this resource.

US Highway 160 (SLP10654.1): The entire highway is eligible but the segment in the project area is not supporting. An existing concrete box culvert under the highway at Wilson Gulch will be replaced with a bridge to accommodate a wildlife crossing, but this will be within existing highway right of way. Because the segment is non-supporting, the alternative results in *no adverse effect*.

Property at 15575 South US Highway 55 (SLP10844): This property is located west of US Highway 550. La Plata County assessor information indicates there is a residence and two sheds dating to 1949 on the parcel; however a site visit revealed that there are no buildings on the property. Because there are no longer any buildings on the property, it is considered not eligible, which results in a finding of *no historic properties affected*.

Webb Ranch (SLP8461): In the 2010 consultation for this property under Revised G Modified, CDOT determined there would be an adverse effect based on the construction of a new highway alignment through the ranch and its effects on the setting, feeling, and association of the property. The acreage of the impact was not included in that consultation letter so this submittal clarifies that approximately 41.5 acres of ROW is needed from the ranch. None of the buildings would be affected by this alternative. There is still an *adverse effect* to this property based on this updated effect information.

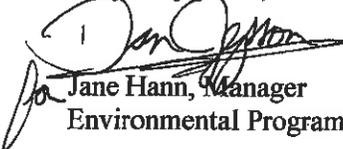
Craig Limousin Ranch (SLP9307): In the 2010 consultation for this property under Revised G Modified, CDOT determined that there would be a direct effect to 22.7 acres of the ranch on its western boundary, resulting in an adverse effect. This evaluation was based on a common termini for the alternatives evaluated in the Section 4(f) evaluation. This common termini was erroneously applied to the effects determination for the Craig Ranch for Alternative Revised G Modified in the December 2010 consultation. Without the common termini, the effect to the ranch would consist of 3.43 acres. There is still an *adverse effect* to this property based on this updated effect information.

It is the judgment of the Federal Highway Administration and CDOT that all the NRHP eligible archaeological sites listed herein or otherwise part of the previous consultation process for the US 550/160 undertaking are significant chiefly because of what can be learned by data recovery, and therefore they have minimal value for preservation in place. As a result, none of those localities qualify for preservation under Section 4(f) of the US Department of Transportation Act of 1966, as codified in 23 CFR 774.13(b)(1&2).

This information has been forwarded concurrently to the other consulting parties and SHPO for review.

As a Section 106 consulting party, we welcome your comments on these findings. Should you elect to respond, we request that you do so within 30 days of receipt of these materials. If we do not hear from you within that time frame we will assume you do not plan to comment. Please contact CDOT Senior Staff Historian Lisa Schoch at (303) 512-4258 or lisa.schoch@state.co.us, or Senior Staff Archaeologist Dan Jepson at (303) 757-9631 or daniel.jepson@state.co.us, if you have questions or require additional information.

Very truly yours,


Jane Hann, Manager
Environmental Programs Branch

Enclosures Survey Report and Site Forms for Alternative R5
Exhibits 7-8, 7-9 & 7-10
APE map, RGM6
Individual Site Forms (SLP6695.1, SLP7759, SLP7874)
Revised APE map for R5



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January 20, 2015

Mr. Edward H. Pappas
Dickinson Wright PLLC
38525 Woodward Ave., Suite 2000
Bloomfield Hills, MI 48304-5092

Subject: Determinations of Eligibility and Effects, Alternatives R5 and RGM6, US Highway 550 South Connection to US Highway 160, La Plata County

Dear Ms. Clark:

This letter and the attached materials constitute a request for comments on determinations of eligibility and effects for the project referenced above. We previously conducted Section 106 consultation regarding eligibility and effects for various alternatives between 2009 and 2011. A consulting party meeting was held in Durango in November 2011 and a Memorandum of Agreement (MOA) was executed in 2012. The Section 106 process was documented in the 2012 US 550 South Connection to US 160 Supplemental Final Environmental Impact Statement (SFEIS)/Section 4(f) Evaluation for the US Highway 160 from Durango to Bayfield EIS. In response to public comment and in an effort to be unbiased and transparent regarding the alternatives, CDOT commissioned an in-depth analysis to evaluate the best alternative to connect US 550 from south of County Road 220 north to US 160. This Independent Alternatives Analysis (IAA) was completed by a consultant team including AMEC Environment and Infrastructure, Muller Engineering Company, and other specialty consultants.

As a result of the IAA, a new preferred alternative has been identified (RGM6). This submittal includes the following updates to historic properties:

1. Updated information about the historic background of the Co-op Ditch segment 5LP9257.2.
2. Alternative R5—Eligibility and Effects. New Alternative R5 was developed and additional survey was completed by consultant HDR to address new properties west of US Highway 550. Note that additional survey for archaeological resources was not completed for this or the other newly designed alternative (RGM6), as all areas proposed for direct effects were either previously inventoried or located on steep, highly eroded slopes that preclude the presence of intact archaeological remains.
3. Alternative RGM6—Eligibility and Effects Determinations. The Preferred Alternative (Revised G Modified) identified in the 2012 SFEIS has been re-designed as Alternative RGM6. The resource base for Alternative RGM6 largely matches that of Revised G Modified, but updated effects determinations have been developed to address the differences between the two.
4. Alternative Revised G Modified—updated Eligibility and Effects Determinations. The Revised G Modified alternative was identified as the preferred alternative in the SFEIS. It has been determined that properties west of US Highway 550 would be affected by Revised G Modified,

but these effects were not discussed in the 2010 consultation for that alternative. This update also includes revisions to the effects information for the historic Webb and Craig Ranches.

1. Clarification, Mason Lateral

In the consultation for the Eastern Realignment Alternative in November 2009, CDOT identified the Co-op Ditch under site number 5LP9257, with two segments evaluated (5LP9257.1 and 5LP9257.2). The ditch was also addressed in the analysis for the Revised F Modified and Revised G Alternatives in December 2010. For all of the previous consultation efforts, there was a finding of *no adverse effect*. Additional research has found that segment 5LP9257.2 south of County Road 220 is actually the Mason Lateral, which has a slightly different history, but maintains the location of the ditch identified as the Co-op Ditch in the 2009 consultation. The site number assigned to the Mason Lateral in 2002—5LP6695.1—has been assigned to this ditch and a new set of site forms is attached.

The former Co-op Ditch (5LP9752.2) was included in the evaluation of effects for Revised G Modified in 2010. The previous consultations indicated that 488 feet of the ditch would be affected as a result of widening the highway from two to four lanes. This effect was based on a common termini developed for alternatives evaluated in the Section 4(f) evaluation. This common termini was applied erroneously to the effects determinations under Section 106. Without the common termini, the ditch segment is south of where the improvements for Revised G Modified would end, and there would be no effect to the ditch, resulting in a finding of *no historic properties affected* for Revised G Modified for this resource. See the attached graphic showing the Revised G Modified alternative for more information about its location relative to the Mason Lateral.

2. Alternative R5

Alternative Description: Alternative R5 is a design variation of Alternative R submitted to CDOT during the public comment period for the 2012 SFEIS. It was modified during the 2014 IAA to meet a higher design speed and deviates from US 550 to meet that criterion. Alternative R5 includes a modified diamond interchange with US Highway 160. See Exhibit 7-8 for more information about the location of this alternative.

Survey Report Corrections: Please note that there are some handwritten corrections in the attached survey report that reflect new information collected after the report was printed. A list of page numbers and a description of the revised content follow:

pp. 26 (Table 3), 45 (Table 4), 46 (Table 5): The report indicates that the Foster property is being treated as NRHP eligible; however, after the report was finalized a field visit revealed that there are no longer any buildings on the property to evaluate and the property is therefore *not eligible*.

p. 46 (Table 4): Denver & Rio Grande Railroad (5LP1131.21): The entire railroad is considered eligible. The documented segment is non-supporting.

pp. 6 (Table 1), 19 (Table 2), 45 (Table 4), 46 (Table 5): The Office of Archaeology and Historic Preservation (OAHP) Compass database indicates that US Highway 550/State Highway 19 (5LP6654) is field eligible. It is not officially eligible as noted in the tables. US Highway 160 (5LP10654) was just evaluated as part of the survey for the R5 Alternative and is considered eligible. It is not officially eligible as noted in the table.

Area of Potential Effects: The APE for this survey was based on design parameters of proposed Alternative R5 and to address the potential for direct and indirect effects to historic properties. The APE boundary encompasses the alternative footprint as well as adjacent parcel boundaries and topographic features. For more information about the APE for Alternative R5, please see pp. 3-4 of the enclosed report as well as the updated map, which shows the APE boundary extending south to include the entire historic property boundary of the Craig Ranch.

Eligibility Determinations: Eleven properties were evaluated for the Alternative R5 survey. Of these, three architectural properties were newly-documented and determined not eligible. An additional property—the Foster Residence at 15575 South US Highway 550—was assigned site number 5LP10844 and was initially identified as an architectural property with assessor information indicating there were several buildings on the parcel dating to 1949. However, a site visit revealed that the buildings are no longer extant and this property was determined not eligible. US Highway 160 (segment 5LP10654.1) was also newly documented; the entire highway is considered eligible but the segment lacks integrity and is non-supporting.

Four previously-recorded resources were documented on site forms as part of this survey effort. A segment of the Denver & Rio Grande Railroad (5LP1131.21) was evaluated; the entire railroad is considered eligible, but the segment lacks integrity and is non-supporting. Re-visitation forms were completed for Bridge/Railroad Ties (5LP7759) and Farm Equipment (5LP7874); the field survey indicates they are no longer extant and are not eligible. A segment of the Mason Lateral (5LP6695.1) was also documented, as discussed above.

The following table summarizes the eligibility determinations for the surveyed properties as well as previously documented archaeological sites. Additional information about these properties (minus the archaeological resources) is provided in the attached survey report.

Site Number	Address/Property Name	Construction Date	Eligibility Determination
5LP1131.21	Denver & Rio Grande Railroad segment	1881	Entire resource is eligible; Non-Supporting segment
5LP2223	Prehistoric archaeological site	N/A	Eligible
5LP6670	Prehistoric archaeological site	N/A	Eligible
5LP6695.1	Mason Lateral	1901	Entire ditch eligible; Supporting segment
5LP7759	Bridge/Railroad Ties	Unknown	No longer extant; Not Eligible
5LP7874	Farm Equipment	Circa 1930-1940	No longer extant; Not Eligible
5LP10844	15575 South US Highway 550; Foster residence	1949	Buildings no longer extant; Not Eligible
5LP10645	16073 S US Highway 550	1956	Not Eligible
5LP10646	27055 E US Highway 160	1958	Not Eligible
5LP10648	27653 E US Highway 160	1952	Not Eligible
5LP 10654.1	US Highway 160 segment	1916-1926, 1938	Entire highway eligible; Non Supporting segment

An additional ten previously-recorded properties are present within the APE, including another segment of the D&RG railroad (5LP1131.8), which is now represented by 5LP1131.21. As noted above, no additional archaeological survey was required and the two known archaeological sites were not re-visited; eligibility determinations for those properties remain unchanged and effects determinations for this alternative were made based on the new design plans.

The previously documented properties with official eligibility determinations were not re-evaluated on site forms, and are shown in the shaded area of the table below. These resources (minus the two archaeological sites) are also listed on p. 6, Table 1 of the enclosed survey report. The eligibility status of these properties was verified in the OAHF Compass database and dates of official determinations of eligibility are included. Based on the 2014 Section 106 Programmatic Agreement executed by CDOT, the State Historic Preservation Officer (SHPO), the Federal Highway Administration (FHWA), and the Advisory Council on Historic Preservation (ACHP), CDOT may rely on the previous determination for officially not eligible properties unless alterations warrant re-evaluation or the property was less than 50 years old when it was determined not eligible.

Effects determinations for newly documented and previously documented properties are summarized in the table below. There is also additional information for select properties below the table. Properties evaluated for the R5 Alternative are noted in the table and site forms for those resources are enclosed.

Effects Determinations

Site Number	Address/Property Name	Eligibility Determination	Effects Determination
5LP1131.21	Denver & Rio Grande Railroad segment	Entire resource is Eligible; Non-Supporting segment (R5 Survey)	Direct effect to 4,000 feet of the railroad due to new access road to gravel pit. No Adverse Effect; *see additional information below
5LP2223	Prehistoric archaeological site	Officially Eligible, 2000	Adverse Effect
5LP6670	Prehistoric archaeological site	Officially Eligible, 2002	Adverse Effect
5LP5649	27561 US 160	Officially Not Eligible, 2000	No Historic Properties Affected
5LP5650	26796 US 160	Officially Not Eligible, 2000	No Historic Properties Affected
5LP5651	26796 US 160	Officially Not Eligible, 2000	No Historic Properties Affected
5LP6632—segments 5LP6632.4, 5LP6632.5, 5LP6632.6	Aztec to Durango Road	Entire road Officially Not Eligible 2002; segments Field Not Eligible	No Historic Properties Affected
5LP6654.1	US Highway 550 Segment	Entire segment Officially Not Eligible, 2011	No Historic Properties Affected
5LP6669	Trash Dump	Officially Not Eligible, 2002	No Historic Properties Affected
5LP6695.1	Mason Lateral (formerly Co-op Ditch)	Eligible, supporting segment (R5 Survey)	Within APE but outside the area of improvements, No Historic Properties Affected
5LP7759	Bridge, railroad ties	Not Eligible—no longer extant (R5 Survey)	No Historic Properties Affected
5LP7873	Corral	Officially Not Eligible, 2005	No Historic Properties Affected
5LP7874	Farm Equipment	Field Not Eligible—no longer extant (R5 Survey)	No Historic Properties Affected
5LP8461	Webb Ranch	Officially Eligible, 2010	Direct effect to 5.2 acres of ranch along western edge, Adverse Effect
5LP8911	Denver & Rio Grande Railroad Trestle—Farmington Branch	Officially Eligible, 2009	Trestle is within the broader APE but will not be affected. No Historic Properties Affected.
5LP9307	Craig Ranch and Hollywood Dairy, Craig Limousin Ranch	Officially Eligible, 2010	Direct effect to 6.9 acres of ranch along western edge, Adverse Effect
5LP10645	16073 S US Highway 550	Not Eligible (R5 Survey)	ROW includes 1 acre north of US 550, 5.9 acres south of US 550, and removal of all buildings on property. No Historic Properties Affected
5LP10646	27055 E US Highway 160	Not Eligible (R5 Survey)	Change to access. No Historic Properties Affected
5LP10648	27653 E US Highway 160	Not Eligible (R5 Survey)	Effects to 1.9 acres of the property for gravel pit

Site Number	Address/Property Name	Eligibility Determination	Effects Determination
			access. This total includes both easements and ROW. No Historic Properties Affected.
SLP 10654.1	US Highway 160 segment	Entire highway Eligible; Non Supporting segment (R5 Survey)	Widening to 20 feet for auxiliary lanes for new ramps. Replacement of Concrete Box Culvert. No Adverse Effect; *see additional information below.
SLP10844	15575 South US Highway 550	Vacant Parcel, Not Eligible (R5 Survey)	No Historic Properties Affected; *see additional information below.

Denver & Rio Grande Railroad (5LP1131.21): The overall railroad is eligible but segment 5LP1131.21 lacks integrity. The railroad is located north of US Highway 160. Currently, parts of the former railroad segment are being used as an access to an existing gravel pit operation. Access to the gravel pit would be affected by construction of the interchange under the R5 Alternative. The new proposed access road to the gravel pit would directly affect 4,000 ft. of the railroad segment. Because the segment lacks integrity, there is a finding of *no adverse effect*.

Webb Ranch (5LP8461): There would be a direct effect to the Webb Ranch as the new highway alignment extends along the western edge of the boundary. Although the buildings would be avoided, the highway represents a new visual element in the ranch setting and will compromise the feeling, setting, and association of the property. A total of 5.2 acres along the western property boundary would be required. CDOT has determined that this alternative results in an *adverse effect*.

Craig Ranch (5LP9307): US 550 would be widened from two to four lanes along the historic ranch boundary and the alternative would require 6.9 acres along the western property boundary from County Road 220 and south along the US 550 alignment as noted in the attached graphic of R5 (Exhibit 7-8). No ranch buildings would be directly affected by the acquisition but open ranch land along the western property boundary would be acquired. These effects diminish the setting, feeling, and association of the ranch. Based on this, CDOT has determined that Alternative R5 results in an *adverse effect* to the Craig Limousin Ranch.

US Highway 160 (5LP10654.1): The entire highway is eligible but the segment in the project area is not supporting. The highway would be widened a total of 20 feet for acceleration/deceleration lanes. An existing concrete box culvert under the highway at Wilson Gulch would be replaced with a bridge to accommodate a wildlife crossing, but this will be within existing highway right of way. Because the segment is non-supporting, the alternative results in *no adverse effect*.

Property at 15575 South US Highway 550 (5LP10844): This property is located west of US Highway 550 and was initially identified as a residential property. La Plata County assessor information indicates there is a residence and two sheds dating to 1949 on the parcel; however a site visit revealed that no buildings are present. Because there are no longer any buildings on the property, it is considered not eligible. An aerial photo showing the building that was once on the parcel is included herewith, along with a photo of the current property. The alternative results in *no historic properties affected*.

3. Alternative RGM6 (Preferred Alternative)

Alternative Description: This alternative is a refinement of Revised G Modified, which was identified as the Preferred Alternative in the SFEIS; Revised G Modified was enhanced during the 2014 Independent Alternatives Analysis and renamed Revised G Modified 6 (RGM6). It connects US 550 to US 160 via the

existing Grandview Interchange, and includes two through lanes in each direction through the Grandview Section of US 160. Further refinement shifted the alternative to the west to avoid more of the irrigated farmland of the Webb Ranch (5LP8461) and thereby reduce impacts to that historic property. For more information refer to Exhibit 7-10. A graphic showing the Revised G Modified alternative (Exhibit 7-9) is included for comparative purposes.

Area of Potential Effects: The APE for this alternative includes the project footprint plus the parcels directly affected by the alternative, as noted on the attached APE map.

Eligibility Determinations: Properties affected by this alternative were identified during the 2009-2011 consultations for Revised G Modified, and include the officially eligible historic Webb Ranch (5LP8461) and Craig Ranch (5LP9307), as well as properties south of County Road 220 and west of US 550 that were recently identified as part of the Alternative R5 survey noted above. Because the status of the previously documented properties (Webb Ranch, Craig Ranch, the US 550 segment, and five archaeological sites) has not changed, new site forms were not completed. Some properties that were identified in the Alternative R5 survey will also be affected by RGM6; these are noted in the following table, which includes properties within the APE for Alternative RGM6:

Site Number	Address/Property Name	Construction Date	Eligibility Determination
5LP2223	Prehistoric archaeological site	N/A	Eligible
5LP6654.1	US Highway 550	1924-1934	Officially Not Eligible, 2011
5LP6670	Prehistoric archaeological site	N/A	Eligible
5LP6695.1	Mason Lateral (formerly Co-op Ditch)	1901	Eligible, supporting segment (R5 Survey)
5LP8461	Webb Ranch		Officially Eligible, 2010
5LP8911	Denver & Rio Grande Railroad Trestle-Farmington Branch		Officially Eligible, 2009
5LP9307	Craig Ranch		Officially Eligible, 2010
5LP9587	Prehistoric archaeological site	N/A	Eligible
5LP9588	Prehistoric archaeological site	N/A	Eligible
5LP9590	Prehistoric archaeological site	N/A	Eligible
5LP10844	15575 South US Highway 550	1949	No buildings on property, Not Eligible
5LP10645	16073 S US Highway 550	1956	Not Eligible (R5 Survey)
5LP 10654.1	US Highway 160 segment	1916-1926, 1938	Entire highway Eligible; Non-Supporting segment (R5 Survey)

Effects Determinations

Site Number	Address/Property Name	Eligibility Determination	Effects Determination
5LP2223	Prehistoric archaeological site	Officially Eligible, 2000	Adverse Effect
5LP6654.1	US Highway 550	Officially Not Eligible, 2011	No Historic Properties Affected
5LP6670	Prehistoric archaeological site	Officially Eligible, 2002	Adverse Effect
5LP6695.1	Mason Lateral (formerly Co-op Ditch)	Eligible, supporting segment (R5 Survey)	Ditch will not be affected. No Historic Properties Affected.
5LP8461	Webb Ranch	Officially Eligible, 2010	Direct effect to 31.8 acres along west edge, Adverse Effect. *See additional information below
5LP8911	Denver & Rio Grande Railroad Trestle—Farmington Branch	Officially Eligible, 2009	Within APE but located on far western edge. Will not be directly or indirectly

Site Number	Address/Property Name	Eligibility Determination	Effects Determination
			affected; No Historic Properties Affected
5LP9307	Craig Ranch	Officially Eligible, 2010	Direct effect to 12.6 acres of ranch along western edge; Adverse Effect. *See additional information below
5LP9587	Prehistoric archaeological site	Officially Eligible, 2010	Adverse Effect
5LP9588	Prehistoric archaeological site	Officially Eligible, 2010	Adverse Effect
5LP9590	Prehistoric archaeological site	Officially Eligible, 2010	Adverse Effect
5LP10844	15575 South US Highway 550	Vacant Parcel, Not Eligible (R5 survey)	No Historic Properties Affected, *See additional information below.
5LP10645	16073 S US Highway 550	Not Eligible (R5 Survey)	1.88 acres of impact north of US 550. 1.0 acre of impact south of US 550. No historic properties affected
5LP 10654.1	US Highway 160 segment	Entire highway eligible; Non Supporting segment (R5 Survey)	Replacement of concrete box culvert at Wilson Gulch within right of way. No Adverse Effect. *See additional information below

Webb Ranch (5LP8461): There will be a direct effect to the Webb Ranch as the new highway alignment extends along the western edge of the boundary. Although the buildings will be avoided, the highway represents a new visual element in the ranch setting and will compromise the feeling, setting and association of the property. A total of 31.8 acres along the western property boundary will be required. CDOT has determined that this alternative results in an *adverse effect*.

Craig Ranch (5LP9307): US 550 will be widened from two to four lanes along the historic ranch boundary and the alternative will require 12.6 acres along the western property boundary from County Road 220 and south along the US 550 alignment as noted in the attached graphic of RGM6. No ranch buildings will be directly affected by the acquisition but open ranch land along the western property boundary will be acquired and the widened US 550 alignment will be closer to the ranch buildings. These effects diminish the setting, feeling and association of the ranch. Based on this, CDOT has determined that Alternative RGM6 results in an *adverse effect* to the Craig Limousin Ranch.

US Highway 160 (5LP10654.1): The entire highway is eligible but the segment in the project area is not supporting. An existing concrete box culvert under the highway at Wilson Gulch will be replaced with a bridge to accommodate a wildlife crossing, but this will be within existing highway right of way. Because the segment is non-supporting, the alternative results in *no adverse effect*.

Property at 15575 South US Highway 55 (5LP10844): This property is located west of US Highway 550 and was assigned a site number. La Plata County assessor information indicates there is a residence and two sheds dating to 1949 on the parcel; however a site visit revealed that there are no buildings present. Because there are no longer any buildings on the property, it is considered not eligible. A map of the property showing the building that was once on the parcel is included along with a photo of its

present condition. The property is not eligible so the alternative results in a finding of *no historic properties affected*.

4. Revised G Modified Alternative

Alternative Description: As noted above, this alternative was identified as Preferred in the SFEIS; however, it has been re-designed as RGM6, which is the new Preferred Alternative. In the 2010 consultation for this alternative there were some properties south of County Road 220 and west of US Highway 550 that were not assessed for effects. Some of these properties were recently evaluated during the survey for Alternative R5, and those site forms are part of this submittal. Only properties that weren't addressed in previous consultation or that required updates to effects information are included in this section, including archaeological sites 5LP6670, 5LP9588, 5LP9589 and 5LP9590. This alternative connects US Highway 550 to US Highway 160 via the Grandview Interchange and includes two through lanes in each direction. Please see Exhibit 7-9 for more information about the alternative.

Effects Determinations

Site Number	Address/Property Name	Eligibility Determination	Effect Determination
5LP1131.21	Denver & Rio Grande Railroad	Eligible (R5 Survey)	All improvements are south of US 160 so there are no effects. No Historic Properties Affected.
5LP6695.1	Mason Lateral (formerly Co-op Ditch)	Entire ditch eligible; supporting segment	Ditch is located south of improvements. No historic properties affected. *See additional information below
5LP8461	Webb Ranch	Officially Eligible, 2010	Direct effect to 41.5 acres of land; Adverse Effect. *See additional information below
5LP9307	Craig Limousin Ranch	Officially Eligible, 2010	Direct effect to 3.43 acres, Adverse Effect. *See additional information below
5LP10844	15575 South US Highway 550	Vacant Parcel, Not Eligible (R5 Survey)	No Historic Properties Affected. *See additional information below.
5LP10645	16073 S US Highway 550	Not Eligible (R5 Survey)	This alternative directly affects 0.13 acres. No historic properties affected
5LP 10654.1	US Highway 160 segment	Entire highway Eligible; Non Supporting segment (R5 Survey)	Replacement of concrete box culvert at Wilson Gulch within right of way; No Adverse Effect. *See additional information below.

Mason Lateral (5LP6695.1): As noted earlier, the Mason Lateral segment (formerly the Co-op Ditch) was evaluated for effects from Revised G Modified in 2010 and was found to result in a direct effect to 488 feet of the ditch. This effect was based on a common termini that was identified for alternatives evaluated in the Section 4(f) evaluation. This common termini was applied erroneously to the effect determinations under Section 106. Without the common termini, the ditch segment is south of where the improvements for Revised G Modified would end, and there would be no effect to the ditch, resulting in a finding of *no historic properties affected* for Revised G Modified for this resource.

US Highway 160 (5LP10654.1): The entire highway is eligible but the segment in the project area is not supporting. An existing concrete box culvert under the highway at Wilson Gulch will be replaced with a bridge to accommodate a wildlife crossing, but this will be within existing highway right of way. Because the segment is non-supporting, the alternative results in *no adverse effect*.

Property at 15575 South US Highway 55 (5LP10844): This property is located west of US Highway 550. La Plata County assessor information indicates there is a residence and two sheds dating to 1949 on the parcel; however a site visit revealed that there are no buildings on the property. Because there are no longer any buildings on the property, it is considered not eligible, which results in a finding of *no historic properties affected*.

Webb Ranch (5LP8461): In the 2010 consultation for this property under Revised G Modified, CDOT determined there would be an adverse effect based on the construction of a new highway alignment through the ranch and its effects on the setting, feeling, and association of the property. The acreage of the impact was not included in that consultation letter so this submittal clarifies that approximately 41.5 acres of ROW is needed from the ranch. None of the buildings would be affected by this alternative. There is still an *adverse effect* to this property based on this updated effect information.

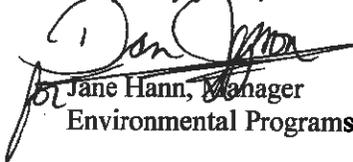
Craig Limousin Ranch (5LP9307): In the 2010 consultation for this property under Revised G Modified, CDOT determined that there would be a direct effect to 22.7 acres of the ranch on its western boundary, resulting in an adverse effect. This evaluation was based on a common termini for the alternatives evaluated in the Section 4(f) evaluation. This common termini was erroneously applied to the effects determination for the Craig Ranch for Alternative Revised G Modified in the December 2010 consultation. Without the common termini, the effect to the ranch would consist of 3.43 acres. There is still an *adverse effect* to this property based on this updated effect information.

It is the judgment of the Federal Highway Administration and CDOT that all the NRHP eligible archaeological sites listed herein or otherwise part of the previous consultation process for the US 550/160 undertaking are significant chiefly because of what can be learned by data recovery, and therefore they have minimal value for preservation in place. As a result, none of those localities qualify for preservation under Section 4(f) of the US Department of Transportation Act of 1966, as codified in 23 CFR 774.13(b)(1&2).

This information has been forwarded concurrently to the other consulting parties and SHPO for review.

As a Section 106 consulting party, we welcome your comments on these findings. Should you elect to respond, we request that you do so within 30 days of receipt of these materials. If we do not hear from you within that time frame we will assume you do not plan to comment. Please contact CDOT Senior Staff Historian Lisa Schoch at (303) 512-4258 or lisa.schoch@state.co.us, or Senior Staff Archaeologist Dan Jepson at (303) 757-9631 or daniel.jepson@state.co.us, if you have questions or require additional information.

Very truly yours,


for Jane Hann, Manager
Environmental Programs Branch

Enclosures Survey Report and Site Forms for Alternative R5
Exhibits 7-8, 7-9 & 7-10
APE map, RGM6
Individual Site Forms (5LP6695.1, 5LP7759, 5LP7874)
Revised APE map for R5



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January 20, 2015

Mr. Shannon Bennett
455 Pinnacle View Drive
Durango, CO 81301

Subject: Determinations of Eligibility and Effects, Alternatives R5 and RGM6, US Highway 550 South Connection to US Highway 160, La Plata County

Dear Mr. Bennett:

This letter and the attached materials constitute a request for comments on determinations of eligibility and effects for the project referenced above. We previously conducted Section 106 consultation regarding eligibility and effects for various alternatives between 2009 and 2011. A consulting party meeting was held in Durango in November 2011 and a Memorandum of Agreement (MOA) was executed in 2012. The Section 106 process was documented in the 2012 US 550 South Connection to US 160 Supplemental Final Environmental Impact Statement (SFEIS)/Section 4(f) Evaluation for the US Highway 160 from Durango to Bayfield EIS. In response to public comment and in an effort to be unbiased and transparent regarding the alternatives, CDOT commissioned an in-depth analysis to evaluate the best alternative to connect US 550 from south of County Road 220 north to US 160. This Independent Alternatives Analysis (IAA) was completed by a consultant team including AMEC Environment and Infrastructure, Muller Engineering Company, and other specialty consultants.

As a result of the IAA, a new preferred alternative has been identified (RGM6). This submittal includes the following updates to historic properties:

1. Updated information about the historic background of the Co-op Ditch segment 5LP9257.2.
2. Alternative R5—Eligibility and Effects. New Alternative R5 was developed and additional survey was completed by consultant HDR to address new properties west of US Highway 550. Note that additional survey for archaeological resources was not completed for this or the other newly designed alternative (RGM6), as all areas proposed for direct effects were either previously inventoried or located on steep, highly eroded slopes that preclude the presence of intact archaeological remains.
3. Alternative RGM6—Eligibility and Effects Determinations. The Preferred Alternative (Revised G Modified) identified in the 2012 SFEIS has been re-designed as Alternative RGM6. The resource base for Alternative RGM6 largely matches that of Revised G Modified, but updated effects determinations have been developed to address the differences between the two.
4. Alternative Revised G Modified—updated Eligibility and Effects Determinations. The Revised G Modified alternative was identified as the preferred alternative in the SFEIS. It has been determined that properties west of US Highway 550 would be affected by Revised G Modified,

but these effects were not discussed in the 2010 consultation for that alternative. This update also includes revisions to the effects information for the historic Webb and Craig Ranches.

1. Clarification, Mason Lateral

In the consultation for the Eastern Realignment Alternative in November 2009, CDOT identified the Co-op Ditch under site number 5LP9257, with two segments evaluated (5LP9257.1 and 5LP9257.2). The ditch was also addressed in the analysis for the Revised F Modified and Revised G Alternatives in December 2010. For all of the previous consultation efforts, there was a finding of *no adverse effect*. Additional research has found that segment 5LP9257.2 south of County Road 220 is actually the Mason Lateral, which has a slightly different history, but maintains the location of the ditch identified as the Co-op Ditch in the 2009 consultation. The site number assigned to the Mason Lateral in 2002—5LP6695.1—has been assigned to this ditch and a new set of site forms is attached.

The former Co-op Ditch (5LP9752.2) was included in the evaluation of effects for Revised G Modified in 2010. The previous consultations indicated that 488 feet of the ditch would be affected as a result of widening the highway from two to four lanes. This effect was based on a common termini developed for alternatives evaluated in the Section 4(f) evaluation. This common termini was applied erroneously to the effects determinations under Section 106. Without the common termini, the ditch segment is south of where the improvements for Revised G Modified would end, and there would be no effect to the ditch, resulting in a finding of *no historic properties affected* for Revised G Modified for this resource. See the attached graphic showing the Revised G Modified alternative for more information about its location relative to the Mason Lateral.

2. Alternative R5

Alternative Description: Alternative R5 is a design variation of Alternative R submitted to CDOT during the public comment period for the 2012 SFEIS. It was modified during the 2014 IAA to meet a higher design speed and deviates from US 550 to meet that criterion. Alternative R5 includes a modified diamond interchange with US Highway 160. See Exhibit 7-8 for more information about the location of this alternative.

Survey Report Corrections: Please note that there are some handwritten corrections in the attached survey report that reflect new information collected after the report was printed. A list of page numbers and a description of the revised content follow:

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p. 46 (Table 4): Denver & Rio Grande Railroad (5LP1131.21): The entire railroad is considered eligible. The documented segment is non-supporting.

pp. 6 (Table 1), 19 (Table 2), 45 (Table 4), 46 (Table 5): The Office of Archaeology and Historic Preservation (OAHP) Compass database indicates that US Highway 550/State Highway 19 (5LP6654) is field eligible. It is not officially eligible as noted in the tables. US Highway 160 (5LP10654) was just evaluated as part of the survey for the R5 Alternative and is considered eligible. It is not officially eligible as noted in the table.

Area of Potential Effects: The APE for this survey was based on design parameters of proposed Alternative R5 and to address the potential for direct and indirect effects to historic properties. The APE boundary encompasses the alternative footprint as well as adjacent parcel boundaries and topographic features. For more information about the APE for Alternative R5, please see pp. 3-4 of the enclosed report as well as the updated map, which shows the APE boundary extending south to include the entire historic property boundary of the Craig Ranch.

Eligibility Determinations: Eleven properties were evaluated for the Alternative R5 survey. Of these, three architectural properties were newly-documented and determined not eligible. An additional property—the Foster Residence at 15575 South US Highway 550—was assigned site number 5LP10844 and was initially identified as an architectural property with assessor information indicating there were several buildings on the parcel dating to 1949. However, a site visit revealed that the buildings are no longer extant and this property was determined not eligible. US Highway 160 (segment 5LP10654.1) was also newly documented; the entire highway is considered eligible but the segment lacks integrity and is non-supporting.

Four previously-recorded resources were documented on site forms as part of this survey effort. A segment of the Denver & Rio Grande Railroad (5LP1131.21) was evaluated; the entire railroad is considered eligible, but the segment lacks integrity and is non-supporting. Re-visitation forms were completed for Bridge/Railroad Ties (5LP7759) and Farm Equipment (5LP7874); the field survey indicates they are no longer extant and are not eligible. A segment of the Mason Lateral (5LP6695.1) was also documented, as discussed above.

The following table summarizes the eligibility determinations for the surveyed properties as well as previously documented archaeological sites. Additional information about these properties (minus the archaeological resources) is provided in the attached survey report.

Site Number	Address/Property Name	Construction Date	Eligibility Determination
5LP1131.21	Denver & Rio Grande Railroad segment	1881	Entire resource is eligible; Non-Supporting segment
5LP2223	Prehistoric archaeological site	N/A	Eligible
5LP6670	Prehistoric archaeological site	N/A	Eligible
5LP6695.1	Mason Lateral	1901	Entire ditch eligible; Supporting segment
5LP7759	Bridge/Railroad Ties	Unknown	No longer extant; Not Eligible
5LP7874	Farm Equipment	Circa 1930-1940	No longer extant; Not Eligible
5LP10844	15575 South US Highway 550; Foster residence	1949	Buildings no longer extant; Not Eligible
5LP10645	16073 S US Highway 550	1956	Not Eligible
5LP10646	27055 E US Highway 160	1958	Not Eligible
5LP10648	27653 E US Highway 160	1952	Not Eligible
5LP 10654.1	US Highway 160 segment	1916-1926, 1938	Entire highway eligible; Non Supporting segment

An additional ten previously-recorded properties are present within the APE, including another segment of the D&RG railroad (5LP1131.8), which is now represented by 5LP1131.21. As noted above, no additional archaeological survey was required and the two known archaeological sites were not re-visited; eligibility determinations for those properties remain unchanged and effects determinations for this alternative were made based on the new design plans.

The previously documented properties with official eligibility determinations were not re-evaluated on site forms, and are shown in the shaded area of the table below. These resources (minus the two archaeological sites) are also listed on p. 6, Table 1 of the enclosed survey report. The eligibility status of these properties was verified in the OAHF Compass database and dates of official determinations of eligibility are included. Based on the 2014 Section 106 Programmatic Agreement executed by CDOT, the State Historic Preservation Officer (SHPO), the Federal Highway Administration (FHWA), and the Advisory Council on Historic Preservation (ACHP), CDOT may rely on the previous determination for officially not eligible properties unless alterations warrant re-evaluation or the property was less than 50 years old when it was determined not eligible.

Effects determinations for newly documented and previously documented properties are summarized in the table below. There is also additional information for select properties below the table. Properties evaluated for the R5 Alternative are noted in the table and site forms for those resources are enclosed.

Effects Determinations

Site Number	Address/Property Name	Eligibility Determination	Effects Determination
5LP1131.21	Denver & Rio Grande Railroad segment	Entire resource is Eligible; Non-Supporting segment (R5 Survey)	Direct effect to 4,000 feet of the railroad due to new access road to gravel pit. No Adverse Effect; *see additional information below.
5LP2223	Prehistoric archaeological site	Officially Eligible, 2000	Adverse Effect
5LP6670	Prehistoric archaeological site	Officially Eligible, 2002	Adverse Effect
5LP5649	27561 US 160	Officially Not Eligible, 2000	No Historic Properties Affected
5LP5650	26796 US 160	Officially Not Eligible, 2000	No Historic Properties Affected
5LP5651	26796 US 160	Officially Not Eligible, 2000	No Historic Properties Affected
5LP6632—segments 5LP6632.4, 5LP6632.5, 5LP6632.6	Aztec to Durango Road	Entire road Officially Not Eligible 2002; segments Field Not Eligible	No Historic Properties Affected
5LP6654.1	US Highway 550 Segment	Entire segment Officially Not Eligible, 2011	No Historic Properties Affected
5LP6669	Trash Dump	Officially Not Eligible, 2002	No Historic Properties Affected
5LP6695.1	Mason Lateral (formerly Co-op Ditch)	Eligible, supporting segment (R5 Survey)	Within APE but outside the area of improvements; No Historic Properties Affected
5LP7759	Bridge, railroad ties	Not Eligible—no longer extant (R5 Survey)	No Historic Properties Affected
5LP7873	Corral	Officially Not Eligible, 2005	No Historic Properties Affected
5LP7874	Farm Equipment	Field Not Eligible—no longer extant (R5 Survey)	No Historic Properties Affected
5LP8461	Webb Ranch	Officially Eligible, 2010	Direct effect to 5.2 acres of ranch along western edge, Adverse Effect
5LP8911	Denver & Rio Grande Railroad Trestle—Farmington Branch	Officially Eligible, 2009	Trestle is within the broader APE but will not be affected. No Historic Properties Affected.
5LP9307	Craig Ranch and Hollywood Dairy, Craig Limousin Ranch	Officially Eligible, 2010	Direct effect to 6.9 acres of ranch along western edge, Adverse Effect
5LP10645	16073 S US Highway 550	Not Eligible (R5 Survey)	ROW includes 1 acre north of US 550, 5.9 acres south of US 550, and removal of all buildings on property. No Historic Properties Affected
5LP10646	27055 E US Highway 160	Not Eligible (R5 Survey)	Change to access. No Historic Properties Affected
5LP10648	27653 E US Highway 160	Not Eligible (R5 Survey)	Effects to 1.9 acres of the property for gravel pit

Site Number	Address/Property Name	Eligibility Determination	Effects Determination
			access. This total includes both easements and ROW. No Historic Properties Affected.
5LP 10654.1	US Highway 160 segment	Entire highway Eligible; Non Supporting segment (R5 Survey)	Widening to 20 feet for auxiliary lanes for new ramps. Replacement of Concrete Box Culvert. No Adverse Effect; *see additional information below.
5LP10844	15575 South US Highway 550	Vacant Parcel, Not Eligible (R5 Survey)	No Historic Properties Affected; *see additional information below.

Denver & Rio Grande Railroad (5LP1131.21): The overall railroad is eligible but segment 5LP1131.21 lacks integrity. The railroad is located north of US Highway 160. Currently, parts of the former railroad segment are being used as an access to an existing gravel pit operation. Access to the gravel pit would be affected by construction of the interchange under the R5 Alternative. The new proposed access road to the gravel pit would directly affect 4,000 ft. of the railroad segment. Because the segment lacks integrity, there is a finding of *no adverse effect*.

Webb Ranch (5LP8461): There would be a direct effect to the Webb Ranch as the new highway alignment extends along the western edge of the boundary. Although the buildings would be avoided, the highway represents a new visual element in the ranch setting and will compromise the feeling, setting, and association of the property. A total of 5.2 acres along the western property boundary would be required. CDOT has determined that this alternative results in an *adverse effect*.

Craig Ranch (5LP9307): US 550 would be widened from two to four lanes along the historic ranch boundary and the alternative would require 6.9 acres along the western property boundary from County Road 220 and south along the US 550 alignment as noted in the attached graphic of R5 (Exhibit 7-8). No ranch buildings would be directly affected by the acquisition but open ranch land along the western property boundary would be acquired. These effects diminish the setting, feeling, and association of the ranch. Based on this, CDOT has determined that Alternative R5 results in an *adverse effect* to the Craig Limousin Ranch.

US Highway 160 (5LP10654.1): The entire highway is eligible but the segment in the project area is not supporting. The highway would be widened a total of 20 feet for acceleration/deceleration lanes. An existing concrete box culvert under the highway at Wilson Gulch would be replaced with a bridge to accommodate a wildlife crossing, but this will be within existing highway right of way. Because the segment is non-supporting, the alternative results in *no adverse effect*.

Property at 15575 South US Highway 550 (5LP10844): This property is located west of US Highway 550 and was initially identified as a residential property. La Plata County assessor information indicates there is a residence and two sheds dating to 1949 on the parcel; however a site visit revealed that no buildings are present. Because there are no longer any buildings on the property, it is considered not eligible. An aerial photo showing the building that was once on the parcel is included herewith, along with a photo of the current property. The alternative results in *no historic properties affected*.

3. Alternative RGM6 (Preferred Alternative)

Alternative Description: This alternative is a refinement of Revised G Modified, which was identified as the Preferred Alternative in the SFEIS; Revised G Modified was enhanced during the 2014 Independent Alternatives Analysis and renamed Revised G Modified 6 (RGM6). It connects US 550 to US 160 via the

existing Grandview Interchange, and includes two through lanes in each direction through the Grandview Section of US 160. Further refinement shifted the alternative to the west to avoid more of the irrigated farmland of the Webb Ranch (5LP8461) and thereby reduce impacts to that historic property. For more information refer to Exhibit 7-10. A graphic showing the Revised G Modified alternative (Exhibit 7-9) is included for comparative purposes.

Area of Potential Effects: The APE for this alternative includes the project footprint plus the parcels directly affected by the alternative, as noted on the attached APE map.

Eligibility Determinations: Properties affected by this alternative were identified during the 2009-2011 consultations for Revised G Modified, and include the officially eligible historic Webb Ranch (5LP8461) and Craig Ranch (5LP9307), as well as properties south of County Road 220 and west of US 550 that were recently identified as part of the Alternative R5 survey noted above. Because the status of the previously documented properties (Webb Ranch, Craig Ranch, the US 550 segment, and five archaeological sites) has not changed, new site forms were not completed. Some properties that were identified in the Alternative R5 survey will also be affected by RGM6; these are noted in the following table, which includes properties within the APE for Alternative RGM6:

Site Number	Address/Property Name	Construction Date	Eligibility Determination
5LP2223	Prehistoric archaeological site	N/A	Eligible
5LP6654.1	US Highway 550	1924-1934	Officially Not Eligible, 2011
5LP6670	Prehistoric archaeological site	N/A	Eligible
5LP6695.1	Mason Lateral (formerly Co-op Ditch)	1901	Eligible, supporting segment (R5 Survey)
5LP8461	Webb Ranch		Officially Eligible, 2010
5LP8911	Denver & Rio Grande Railroad Trestle-Farmington Branch		Officially Eligible, 2009
5LP9307	Craig Ranch		Officially Eligible, 2010
5LP9587	Prehistoric archaeological site	N/A	Eligible
5LP9588	Prehistoric archaeological site	N/A	Eligible
5LP9590	Prehistoric archaeological site	N/A	Eligible
5LP10844	15575 South US Highway 550	1949	No buildings on property, Not Eligible
5LP10645	16073 S US Highway 550	1956	Not Eligible (R5 Survey)
5LP 10654.1	US Highway 160 segment	1916-1926, 1938	Entire highway Eligible; Non-Supporting segment (R5 Survey)

Effects Determinations

Site Number	Address/Property Name	Eligibility Determination	Effects Determination
5LP2223	Prehistoric archaeological site	Officially Eligible, 2000	Adverse Effect
5LP6654.1	US Highway 550	Officially Not Eligible, 2011	No Historic Properties Affected
5LP6670	Prehistoric archaeological site	Officially Eligible, 2002	Adverse Effect
5LP6695.1	Mason Lateral (formerly Co-op Ditch)	Eligible, supporting segment (R5 Survey)	Ditch will not be affected. No Historic Properties Affected.
5LP8461	Webb Ranch	Officially Eligible, 2010	Direct effect to 31.8 acres along west edge, Adverse Effect. *See additional information below
5LP8911	Denver & Rio Grande Railroad Trestle—Farmington Branch	Officially Eligible, 2009	Within APE but located on far western edge. Will not be directly or indirectly

Site Number	Address/Property Name	Eligibility Determination	Effects Determination
			affected; No Historic Properties Affected
5LP9307	Craig Ranch	Officially Eligible, 2010	Direct effect to 12.6 acres of ranch along western edge; Adverse Effect. *See additional information below
5LP9587	Prehistoric archaeological site	Officially Eligible, 2010	Adverse Effect
5LP9588	Prehistoric archaeological site	Officially Eligible, 2010	Adverse Effect
5LP9590	Prehistoric archaeological site	Officially Eligible, 2010	Adverse Effect
5LP10844	15575 South US Highway 550	Vacant Parcel, Not Eligible (R5 survey)	No Historic Properties Affected, *See additional information below.
5LP10645	16073 S US Highway 550	Not Eligible (R5 Survey)	1.88 acres of impact north of US 550. 1.0 acre of impact south of US 550. No historic properties affected
5LP 10654.1	US Highway 160 segment	Entire highway eligible; Non Supporting segment (R5 Survey)	Replacement of concrete box culvert at Wilson Gulch within right of way. No Adverse Effect. *See additional information below

Webb Ranch (5LP8461): There will be a direct effect to the Webb Ranch as the new highway alignment extends along the western edge of the boundary. Although the buildings will be avoided, the highway represents a new visual element in the ranch setting and will compromise the feeling, setting and association of the property. A total of 31.8 acres along the western property boundary will be required. CDOT has determined that this alternative results in an *adverse effect*.

Craig Ranch (5LP9307): US 550 will be widened from two to four lanes along the historic ranch boundary and the alternative will require 12.6 acres along the western property boundary from County Road 220 and south along the US 550 alignment as noted in the attached graphic of RGM6. No ranch buildings will be directly affected by the acquisition but open ranch land along the western property boundary will be acquired and the widened US 550 alignment will be closer to the ranch buildings. These effects diminish the setting, feeling and association of the ranch. Based on this, CDOT has determined that Alternative RGM6 results in an *adverse effect* to the Craig Limousin Ranch.

US Highway 160 (5LP10654.1): The entire highway is eligible but the segment in the project area is not supporting. An existing concrete box culvert under the highway at Wilson Gulch will be replaced with a bridge to accommodate a wildlife crossing, but this will be within existing highway right of way. Because the segment is non-supporting, the alternative results in *no adverse effect*.

Property at 15575 South US Highway 55 (5LP10844): This property is located west of US Highway 550 and was assigned a site number. La Plata County assessor information indicates there is a residence and two sheds dating to 1949 on the parcel; however a site visit revealed that there are no buildings present. Because there are no longer any buildings on the property, it is considered not eligible. A map of the property showing the building that was once on the parcel is included along with a photo of its

present condition. The property is not eligible so the alternative results in a finding of *no historic properties affected*.

4. Revised G Modified Alternative

Alternative Description: As noted above, this alternative was identified as Preferred in the SFEIS; however, it has been re-designed as RGM6, which is the new Preferred Alternative. In the 2010 consultation for this alternative there were some properties south of County Road 220 and west of US Highway 550 that were not assessed for effects. Some of these properties were recently evaluated during the survey for Alternative R5, and those site forms are part of this submittal. Only properties that weren't addressed in previous consultation or that required updates to effects information are included in this section, including archaeological sites 5LP6670, 5LP9588, 5LP9589 and 5LP9590. This alternative connects US Highway 550 to US Highway 160 via the Grandview Interchange and includes two through lanes in each direction. Please see Exhibit 7-9 for more information about the alternative.

Effects Determinations

Site Number	Address/Property Name	Eligibility Determination	Effect Determination
5LP1131.21	Denver & Rio Grande Railroad	Eligible (R5 Survey)	All improvements are south of US 160 so there are no effects. No Historic Properties Affected.
5LP6695.1	Mason Lateral (formerly Co-op Ditch)	Entire ditch eligible; supporting segment	Ditch is located south of improvements. No historic properties affected. *See additional information below
5LP8461	Webb Ranch	Officially Eligible, 2010	Direct effect to 41.5 acres of land; Adverse Effect. *See additional information below
5LP9307	Craig Limousin Ranch	Officially Eligible, 2010	Direct effect to 3.43 acres, Adverse Effect. *See additional information below
5LP10844	15575 South US Highway 550	Vacant Parcel, Not Eligible (R5 Survey)	No Historic Properties Affected. *See additional information below.
5LP10645	16073 S US Highway 550	Not Eligible (R5 Survey)	This alternative directly affects 0.13 acres. No historic properties affected
5LP 10654.1	US Highway 160 segment	Entire highway Eligible; Non Supporting segment (R5 Survey)	Replacement of concrete box culvert at Wilson Gulch within right of way; No Adverse Effect. *See additional information below.

Mason Lateral (5LP6695.1): As noted earlier, the Mason Lateral segment (formerly the Co-op Ditch) was evaluated for effects from Revised G Modified in 2010 and was found to result in a direct effect to 488 feet of the ditch. This effect was based on a common termini that was identified for alternatives evaluated in the Section 4(f) evaluation. This common termini was applied erroneously to the effect determinations under Section 106. Without the common termini, the ditch segment is south of where the improvements for Revised G Modified would end, and there would be no effect to the ditch, resulting in a finding of *no historic properties affected* for Revised G Modified for this resource.

US Highway 160 (5LP10654.1): The entire highway is eligible but the segment in the project area is not supporting. An existing concrete box culvert under the highway at Wilson Gulch will be replaced with a bridge to accommodate a wildlife crossing, but this will be within existing highway right of way. Because the segment is non-supporting, the alternative results in *no adverse effect*.

Property at 15575 South US Highway 55 (5LP10844): This property is located west of US Highway 550. La Plata County assessor information indicates there is a residence and two sheds dating to 1949 on the parcel; however a site visit revealed that there are no buildings on the property. Because there are no longer any buildings on the property, it is considered not eligible, which results in a finding of *no historic properties affected*.

Webb Ranch (5LP8461): In the 2010 consultation for this property under Revised G Modified, CDOT determined there would be an adverse effect based on the construction of a new highway alignment through the ranch and its effects on the setting, feeling, and association of the property. The acreage of the impact was not included in that consultation letter so this submittal clarifies that approximately 41.5 acres of ROW is needed from the ranch. None of the buildings would be affected by this alternative. There is still an *adverse effect* to this property based on this updated effect information.

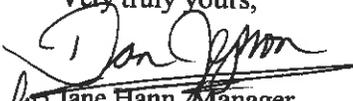
Craig Limousin Ranch (5LP9307): In the 2010 consultation for this property under Revised G Modified, CDOT determined that there would be a direct effect to 22.7 acres of the ranch on its western boundary, resulting in an adverse effect. This evaluation was based on a common termini for the alternatives evaluated in the Section 4(f) evaluation. This common termini was erroneously applied to the effects determination for the Craig Ranch for Alternative Revised G Modified in the December 2010 consultation. Without the common termini, the effect to the ranch would consist of 3.43 acres. There is still an *adverse effect* to this property based on this updated effect information.

It is the judgment of the Federal Highway Administration and CDOT that all the NRHP eligible archaeological sites listed herein or otherwise part of the previous consultation process for the US 550/160 undertaking are significant chiefly because of what can be learned by data recovery, and therefore they have minimal value for preservation in place. As a result, none of those localities qualify for preservation under Section 4(f) of the US Department of Transportation Act of 1966, as codified in 23 CFR 774.13(b)(1&2).

This information has been forwarded concurrently to the other consulting parties and SHPO for review.

As a Section 106 consulting party, we welcome your comments on these findings. Should you elect to respond, we request that you do so within 30 days of receipt of these materials. If we do not hear from you within that time frame we will assume you do not plan to comment. Please contact CDOT Senior Staff Historian Lisa Schoch at (303) 512-4258 or lisa.schoch@state.co.us, or Senior Staff Archaeologist Dan Jepson at (303) 757-9631 or daniel.jepson@state.co.us, if you have questions or require additional information.

Very truly yours,


Jane Hann, Manager
Environmental Programs Branch

Enclosures Survey Report and Site Forms for Alternative R5
Exhibits 7-8, 7-9 & 7-10
APE map, RGM6
Individual Site Forms (5LP6695.1, 5LP7759, 5LP7874)
Revised APE map for R5



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January 20, 2015

Ms. Antonia Clark
P.O. Box 3446
Durango, CO 81302

Subject: Determinations of Eligibility and Effects, Alternatives R5 and RGM6, US Highway 550 South Connection to US Highway 160, La Plata County

Dear Ms. Clark:

This letter and the attached materials constitute a request for comments on determinations of eligibility and effects for the project referenced above. We previously conducted Section 106 consultation regarding eligibility and effects for various alternatives between 2009 and 2011. A consulting party meeting was held in Durango in November 2011 and a Memorandum of Agreement (MOA) was executed in 2012. The Section 106 process was documented in the 2012 US 550 South Connection to US 160 Supplemental Final Environmental Impact Statement (SFEIS)/Section 4(f) Evaluation for the US Highway 160 from Durango to Bayfield EIS. In response to public comment and in an effort to be unbiased and transparent regarding the alternatives, CDOT commissioned an in-depth analysis to evaluate the best alternative to connect US 550 from south of County Road 220 north to US 160. This Independent Alternatives Analysis (IAA) was completed by a consultant team including AMEC Environment and Infrastructure, Muller Engineering Company, and other specialty consultants.

As a result of the IAA, a new preferred alternative has been identified (RGM6). This submittal includes the following updates to historic properties:

1. Updated information about the historic background of the Co-op Ditch segment 5LP9257.2.
2. Alternative R5—Eligibility and Effects. New Alternative R5 was developed and additional survey was completed by consultant HDR to address new properties west of US Highway 550. Note that additional survey for archaeological resources was not completed for this or the other newly designed alternative (RGM6), as all areas proposed for direct effects were either previously inventoried or located on steep, highly eroded slopes that preclude the presence of intact archaeological remains.
3. Alternative RGM6—Eligibility and Effects Determinations. The Preferred Alternative (Revised G Modified) identified in the 2012 SFEIS has been re-designed as Alternative RGM6. The resource base for Alternative RGM6 largely matches that of Revised G Modified, but updated effects determinations have been developed to address the differences between the two.
4. Alternative Revised G Modified—updated Eligibility and Effects Determinations. The Revised G Modified alternative was identified as the preferred alternative in the SFEIS. It has been determined that properties west of US Highway 550 would be affected by Revised G Modified,

but these effects were not discussed in the 2010 consultation for that alternative. This update also includes revisions to the effects information for the historic Webb and Craig Ranches.

1. Clarification, Mason Lateral

In the consultation for the Eastern Realignment Alternative in November 2009, CDOT identified the Co-op Ditch under site number 5LP9257, with two segments evaluated (5LP9257.1 and 5LP9257.2). The ditch was also addressed in the analysis for the Revised F Modified and Revised G Alternatives in December 2010. For all of the previous consultation efforts, there was a finding of *no adverse effect*. Additional research has found that segment 5LP9257.2 south of County Road 220 is actually the Mason Lateral, which has a slightly different history, but maintains the location of the ditch identified as the Co-op Ditch in the 2009 consultation. The site number assigned to the Mason Lateral in 2002—5LP6695.1—has been assigned to this ditch and a new set of site forms is attached.

The former Co-op Ditch (5LP9752.2) was included in the evaluation of effects for Revised G Modified in 2010. The previous consultations indicated that 488 feet of the ditch would be affected as a result of widening the highway from two to four lanes. This effect was based on a common termini developed for alternatives evaluated in the Section 4(f) evaluation. This common termini was applied erroneously to the effects determinations under Section 106. Without the common termini, the ditch segment is south of where the improvements for Revised G Modified would end, and there would be no effect to the ditch, resulting in a finding of *no historic properties affected* for Revised G Modified for this resource. See the attached graphic showing the Revised G Modified alternative for more information about its location relative to the Mason Lateral.

2. Alternative R5

Alternative Description: Alternative R5 is a design variation of Alternative R submitted to CDOT during the public comment period for the 2012 SFEIS. It was modified during the 2014 IAA to meet a higher design speed and deviates from US 550 to meet that criterion. Alternative R5 includes a modified diamond interchange with US Highway 160. See Exhibit 7-8 for more information about the location of this alternative.

Survey Report Corrections: Please note that there are some handwritten corrections in the attached survey report that reflect new information collected after the report was printed. A list of page numbers and a description of the revised content follow:

pp. 26 (Table 3), 45 (Table 4), 46 (Table 5): The report indicates that the Foster property is being treated as NRHP eligible; however, after the report was finalized a field visit revealed that there are no longer any buildings on the property to evaluate and the property is therefore *not eligible*.

p. 46 (Table 4): Denver & Rio Grande Railroad (5LP1131.21): The entire railroad is considered eligible. The documented segment is non-supporting.

pp. 6 (Table 1), 19 (Table 2), 45 (Table 4), 46 (Table 5): The Office of Archaeology and Historic Preservation (OAHP) Compass database indicates that US Highway 550/State Highway 19 (5LP6654) is field eligible. It is not officially eligible as noted in the tables. US Highway 160 (5LP10654) was just evaluated as part of the survey for the R5 Alternative and is considered eligible. It is not officially eligible as noted in the table.

Area of Potential Effects: The APE for this survey was based on design parameters of proposed Alternative R5 and to address the potential for direct and indirect effects to historic properties. The APE boundary encompasses the alternative footprint as well as adjacent parcel boundaries and topographic features. For more information about the APE for Alternative R5, please see pp. 3-4 of the enclosed report as well as the updated map, which shows the APE boundary extending south to include the entire historic property boundary of the Craig Ranch.

Eligibility Determinations: Eleven properties were evaluated for the Alternative R5 survey. Of these, three architectural properties were newly-documented and determined not eligible. An additional property—the Foster Residence at 15575 South US Highway 550—was assigned site number 5LP10844 and was initially identified as an architectural property with assessor information indicating there were several buildings on the parcel dating to 1949. However, a site visit revealed that the buildings are no longer extant and this property was determined not eligible. US Highway 160 (segment 5LP10654.1) was also newly documented; the entire highway is considered eligible but the segment lacks integrity and is non-supporting.

Four previously-recorded resources were documented on site forms as part of this survey effort. A segment of the Denver & Rio Grande Railroad (5LP1131.21) was evaluated; the entire railroad is considered eligible, but the segment lacks integrity and is non-supporting. Re-visitation forms were completed for Bridge/Railroad Ties (5LP7759) and Farm Equipment (5LP7874); the field survey indicates they are no longer extant and are not eligible. A segment of the Mason Lateral (5LP6695.1) was also documented, as discussed above.

The following table summarizes the eligibility determinations for the surveyed properties as well as previously documented archaeological sites. Additional information about these properties (minus the archaeological resources) is provided in the attached survey report.

Site Number	Address/Property Name	Construction Date	Eligibility Determination
5LP1131.21	Denver & Rio Grande Railroad segment	1881	Entire resource is eligible; Non-Supporting segment
5LP2223	Prehistoric archaeological site	N/A	Eligible
5LP6670	Prehistoric archaeological site	N/A	Eligible
5LP6695.1	Mason Lateral	1901	Entire ditch eligible; Supporting segment
5LP7759	Bridge/Railroad Ties	Unknown	No longer extant; Not Eligible
5LP7874	Farm Equipment	Circa 1930-1940	No longer extant; Not Eligible
5LP10844	15575 South US Highway 550; Foster residence	1949	Buildings no longer extant; Not Eligible
5LP10645	16073 S US Highway 550	1956	Not Eligible
5LP10646	27055 E US Highway 160	1958	Not Eligible
5LP10648	27653 E US Highway 160	1952	Not Eligible
5LP 10654.1	US Highway 160 segment	1916-1926, 1938	Entire highway eligible; Non Supporting segment

An additional ten previously-recorded properties are present within the APE, including another segment of the D&RG railroad (5LP1131.8), which is now represented by 5LP1131.21. As noted above, no additional archaeological survey was required and the two known archaeological sites were not re-visited; eligibility determinations for those properties remain unchanged and effects determinations for this alternative were made based on the new design plans.

The previously documented properties with official eligibility determinations were not re-evaluated on site forms, and are shown in the shaded area of the table below. These resources (minus the two archaeological sites) are also listed on p. 6, Table 1 of the enclosed survey report. The eligibility status of these properties was verified in the OAHIP Compass database and dates of official determinations of eligibility are included. Based on the 2014 Section 106 Programmatic Agreement executed by CDOT, the State Historic Preservation Officer (SHPO), the Federal Highway Administration (FHWA), and the Advisory Council on Historic Preservation (ACHP), CDOT may rely on the previous determination for officially not eligible properties unless alterations warrant re-evaluation or the property was less than 50 years old when it was determined not eligible.

Effects determinations for newly documented and previously documented properties are summarized in the table below. There is also additional information for select properties below the table. Properties evaluated for the R5 Alternative are noted in the table and site forms for those resources are enclosed.

Effects Determinations

Site Number	Address/Property Name	Eligibility Determination	Effects Determination
5LP1131.21	Denver & Rio Grande Railroad segment	Entire resource is Eligible; Non-Supporting segment (R5 Survey)	Direct effect to 4,000 feet of the railroad due to new access road to gravel pit. No Adverse Effect; *see additional information below
5LP2223	Prehistoric archaeological site	Officially Eligible, 2000	Adverse Effect
5LP6670	Prehistoric archaeological site	Officially Eligible, 2002	Adverse Effect
5LP5649	27561 US 160	Officially Not Eligible, 2000	No Historic Properties Affected
5LP5650	26796 US 160	Officially Not Eligible, 2000	No Historic Properties Affected
5LP5651	26796 US 160	Officially Not Eligible, 2000	No Historic Properties Affected
5LP6632—segments 5LP6632.4, 5LP6632.5, 5LP6632.6	Aztec to Durango Road	Entire road Officially Not Eligible 2002; segments Field Not Eligible	No Historic Properties Affected
5LP6654.1	US Highway 550 Segment	Entire segment Officially Not Eligible, 2011	No Historic Properties Affected
5LP6669	Trash Dump	Officially Not Eligible, 2002	No Historic Properties Affected
5LP6695.1	Mason Lateral (formerly Co-op Ditch)	Eligible, supporting segment (R5 Survey)	Within APE but outside the area of improvements; No Historic Properties Affected
5LP7759	Bridge, railroad ties	Not Eligible—no longer extant (R5 Survey)	No Historic Properties Affected
5LP7873	Corral	Officially Not Eligible, 2005	No Historic Properties Affected
5LP7874	Farm Equipment	Field Not Eligible—no longer extant (R5 Survey)	No Historic Properties Affected
5LP8461	Webb Ranch	Officially Eligible, 2010	Direct effect to 5.2 acres of ranch along western edge, Adverse Effect
5LP8911	Denver & Rio Grande Railroad Trestle—Farmington Branch	Officially Eligible, 2009	Trestle is within the broader APE but will not be affected. No Historic Properties Affected.
5LP9307	Craig Ranch and Hollywood Dairy, Craig Limousin Ranch	Officially Eligible, 2010	Direct effect to 6.9 acres of ranch along western edge, Adverse Effect
5LP10645	16073 S US Highway 550	Not Eligible (R5 Survey)	ROW includes 1 acre north of US 550, 5.9 acres south of US 550, and removal of all buildings on property. No Historic Properties Affected
5LP10646	27055 E US Highway 160	Not Eligible (R5 Survey)	Change to access. No Historic Properties Affected
5LP10648	27653 E US Highway 160	Not Eligible (R5 Survey)	Effects to 1.9 acres of the property for gravel pit

Site Number	Address/Property Name	Eligibility Determination	Effects Determination
			access. This total includes both easements and ROW. No Historic Properties Affected.
SLP 10654.1	US Highway 160 segment	Entire highway Eligible; Non Supporting segment (R5 Survey)	Widening to 20 feet for auxiliary lanes for new ramps. Replacement of Concrete Box Culvert. No Adverse Effect; *see additional information below.
SLP10844	15575 South US Highway 550	Vacant Parcel, Not Eligible (R5 Survey)	No Historic Properties Affected; *see additional information below.

Denver & Rio Grande Railroad (SLP1131.21): The overall railroad is eligible but segment SLP1131.21 lacks integrity. The railroad is located north of US Highway 160. Currently, parts of the former railroad segment are being used as an access to an existing gravel pit operation. Access to the gravel pit would be affected by construction of the interchange under the R5 Alternative. The new proposed access road to the gravel pit would directly affect 4,000 ft. of the railroad segment. Because the segment lacks integrity, there is a finding of *no adverse effect*.

Webb Ranch (SLP8461): There would be a direct effect to the Webb Ranch as the new highway alignment extends along the western edge of the boundary. Although the buildings would be avoided, the highway represents a new visual element in the ranch setting and will compromise the feeling, setting, and association of the property. A total of 5.2 acres along the western property boundary would be required. CDOT has determined that this alternative results in an *adverse effect*.

Craig Ranch (SLP9307): US 550 would be widened from two to four lanes along the historic ranch boundary and the alternative would require 6.9 acres along the western property boundary from County Road 220 and south along the US 550 alignment as noted in the attached graphic of R5 (Exhibit 7-8). No ranch buildings would be directly affected by the acquisition but open ranch land along the western property boundary would be acquired. These effects diminish the setting, feeling, and association of the ranch. Based on this, CDOT has determined that Alternative R5 results in an *adverse effect* to the Craig Limousin Ranch.

US Highway 160 (SLP10654.1): The entire highway is eligible but the segment in the project area is not supporting. The highway would be widened a total of 20 feet for acceleration/deceleration lanes. An existing concrete box culvert under the highway at Wilson Gulch would be replaced with a bridge to accommodate a wildlife crossing, but this will be within existing highway right of way. Because the segment is non-supporting, the alternative results in *no adverse effect*.

Property at 15575 South US Highway 550 (SLP10844): This property is located west of US Highway 550 and was initially identified as a residential property. La Plata County assessor information indicates there is a residence and two sheds dating to 1949 on the parcel; however a site visit revealed that no buildings are present. Because there are no longer any buildings on the property, it is considered not eligible. An aerial photo showing the building that was once on the parcel is included herewith, along with a photo of the current property. The alternative results in *no historic properties affected*.

3. Alternative RGM6 (Preferred Alternative)

Alternative Description: This alternative is a refinement of Revised G Modified, which was identified as the Preferred Alternative in the SFEIS; Revised G Modified was enhanced during the 2014 Independent Alternatives Analysis and renamed Revised G Modified 6 (RGM6). It connects US 550 to US 160 via the

existing Grandview Interchange, and includes two through lanes in each direction through the Grandview Section of US 160. Further refinement shifted the alternative to the west to avoid more of the irrigated farmland of the Webb Ranch (5LP8461) and thereby reduce impacts to that historic property. For more information refer to Exhibit 7-10. A graphic showing the Revised G Modified alternative (Exhibit 7-9) is included for comparative purposes.

Area of Potential Effects: The APE for this alternative includes the project footprint plus the parcels directly affected by the alternative, as noted on the attached APE map.

Eligibility Determinations: Properties affected by this alternative were identified during the 2009-2011 consultations for Revised G Modified, and include the officially eligible historic Webb Ranch (5LP8461) and Craig Ranch (5LP9307), as well as properties south of County Road 220 and west of US 550 that were recently identified as part of the Alternative R5 survey noted above. Because the status of the previously documented properties (Webb Ranch, Craig Ranch, the US 550 segment, and five archaeological sites) has not changed, new site forms were not completed. Some properties that were identified in the Alternative R5 survey will also be affected by RGM6; these are noted in the following table, which includes properties within the APE for Alternative RGM6:

Site Number	Address/Property Name	Construction Date	Eligibility Determination
5LP2223	Prehistoric archaeological site	N/A	Eligible
5LP6654.1	US Highway 550	1924-1934	Officially Not Eligible, 2011
5LP6670	Prehistoric archaeological site	N/A	Eligible
5LP6695.1	Mason Lateral (formerly Co-op Ditch)	1901	Eligible, supporting segment (R5 Survey)
5LP8461	Webb Ranch		Officially Eligible, 2010
5LP8911	Denver & Rio Grande Railroad Trestle-Farmington Branch		Officially Eligible, 2009
5LP9307	Craig Ranch		Officially Eligible, 2010
5LP9587	Prehistoric archaeological site	N/A	Eligible
5LP9588	Prehistoric archaeological site	N/A	Eligible
5LP9590	Prehistoric archaeological site	N/A	Eligible
5LP10844	15575 South US Highway 550	1949	No buildings on property, Not Eligible
5LP10645	16073 S US Highway 550	1956	Not Eligible (R5 Survey)
5LP 10654.1	US Highway 160 segment	1916-1926, 1938	Entire highway Eligible; Non-Supporting segment (R5 Survey)

Effects Determinations

Site Number	Address/Property Name	Eligibility Determination	Effects Determination
5LP2223	Prehistoric archaeological site	Officially Eligible, 2000	Adverse Effect
5LP6654.1	US Highway 550	Officially Not Eligible, 2011	No Historic Properties Affected
5LP6670	Prehistoric archaeological site	Officially Eligible, 2002	Adverse Effect
5LP6695.1	Mason Lateral (formerly Co-op Ditch)	Eligible, supporting segment (R5 Survey)	Ditch will not be affected. No Historic Properties Affected.
5LP8461	Webb Ranch	Officially Eligible, 2010	Direct effect to 31.8 acres along west edge, Adverse Effect. *See additional information below
5LP8911	Denver & Rio Grande Railroad Trestle—Farmington Branch	Officially Eligible, 2009	Within APE but located on far western edge. Will not be directly or indirectly

Site Number	Address/Property Name	Eligibility Determination	Effects Determination
			affected; No Historic Properties Affected
5LP9307	Craig Ranch	Officially Eligible, 2010	Direct effect to 12.6 acres of ranch along western edge; Adverse Effect. *See additional information below
5LP9587	Prehistoric archaeological site	Officially Eligible, 2010	Adverse Effect
5LP9588	Prehistoric archaeological site	Officially Eligible, 2010	Adverse Effect
5LP9590	Prehistoric archaeological site	Officially Eligible, 2010	Adverse Effect
5LP10844	15575 South US Highway 550	Vacant Parcel, Not Eligible (R5 survey)	No Historic Properties Affected, *See additional information below.
5LP10645	16073 S US Highway 550	Not Eligible (R5 Survey)	1.88 acres of impact north of US 550. 1.0 acre of impact south of US 550. No historic properties affected
5LP 10654.1	US Highway 160 segment	Entire highway eligible; Non Supporting segment (R5 Survey)	Replacement of concrete box culvert at Wilson Gulch within right of way. No Adverse Effect. *See additional information below

Webb Ranch (5LP8461): There will be a direct effect to the Webb Ranch as the new highway alignment extends along the western edge of the boundary. Although the buildings will be avoided, the highway represents a new visual element in the ranch setting and will compromise the feeling, setting and association of the property. A total of 31.8 acres along the western property boundary will be required. CDOT has determined that this alternative results in an *adverse effect*.

Craig Ranch (5LP9307): US 550 will be widened from two to four lanes along the historic ranch boundary and the alternative will require 12.6 acres along the western property boundary from County Road 220 and south along the US 550 alignment as noted in the attached graphic of RGM6. No ranch buildings will be directly affected by the acquisition but open ranch land along the western property boundary will be acquired and the widened US 550 alignment will be closer to the ranch buildings. These effects diminish the setting, feeling and association of the ranch. Based on this, CDOT has determined that Alternative RGM6 results in an *adverse effect* to the Craig Limousin Ranch.

US Highway 160 (5LP10654.1): The entire highway is eligible but the segment in the project area is not supporting. An existing concrete box culvert under the highway at Wilson Gulch will be replaced with a bridge to accommodate a wildlife crossing, but this will be within existing highway right of way. Because the segment is non-supporting, the alternative results in *no adverse effect*.

Property at 15575 South US Highway 55 (5LP10844): This property is located west of US Highway 550 and was assigned a site number. La Plata County assessor information indicates there is a residence and two sheds dating to 1949 on the parcel; however a site visit revealed that there are no buildings present. Because there are no longer any buildings on the property, it is considered not eligible. A map of the property showing the building that was once on the parcel is included along with a photo of its

present condition. The property is not eligible so the alternative results in a finding of *no historic properties affected*.

4. Revised G Modified Alternative

Alternative Description: As noted above, this alternative was identified as Preferred in the SFEIS; however, it has been re-designed as RGM6, which is the new Preferred Alternative. In the 2010 consultation for this alternative there were some properties south of County Road 220 and west of US Highway 550 that were not assessed for effects. Some of these properties were recently evaluated during the survey for Alternative R5, and those site forms are part of this submittal. Only properties that weren't addressed in previous consultation or that required updates to effects information are included in this section, including archaeological sites 5LP6670, 5LP9588, 5LP9589 and 5LP9590. This alternative connects US Highway 550 to US Highway 160 via the Grandview Interchange and includes two through lanes in each direction. Please see Exhibit 7-9 for more information about the alternative.

Effects Determinations

Site Number	Address/Property Name	Eligibility Determination	Effect Determination
5LP1131.21	Denver & Rio Grande Railroad	Eligible (R5 Survey)	All improvements are south of US 160 so there are no effects. No Historic Properties Affected.
5LP6695.1	Mason Lateral (formerly Co-op Ditch)	Entire ditch eligible; supporting segment	Ditch is located south of improvements. No historic properties affected. *See additional information below
5LP8461	Webb Ranch	Officially Eligible, 2010	Direct effect to 41.5 acres of land; Adverse Effect. *See additional information below
5LP9307	Craig Limousin Ranch	Officially Eligible, 2010	Direct effect to 3.43 acres, Adverse Effect. *See additional information below
5LP10844	15575 South US Highway 550	Vacant Parcel, Not Eligible (R5 Survey)	No Historic Properties Affected. *See additional information below.
5LP10645	16073 S US Highway 550	Not Eligible (R5 Survey)	This alternative directly affects 0.13 acres. No historic properties affected
5LP 10654.1	US Highway 160 segment	Entire highway Eligible; Non Supporting segment (R5 Survey)	Replacement of concrete box culvert at Wilson Gulch within right of way; No Adverse Effect. *See additional information below.

Mason Lateral (5LP6695.1): As noted earlier, the Mason Lateral segment (formerly the Co-op Ditch) was evaluated for effects from Revised G Modified in 2010 and was found to result in a direct effect to 488 feet of the ditch. This effect was based on a common termini that was identified for alternatives evaluated in the Section 4(f) evaluation. This common termini was applied erroneously to the effect determinations under Section 106. Without the common termini, the ditch segment is south of where the improvements for Revised G Modified would end, and there would be no effect to the ditch, resulting in a finding of *no historic properties affected* for Revised G Modified for this resource.

US Highway 160 (5LP10654.1): The entire highway is eligible but the segment in the project area is not supporting. An existing concrete box culvert under the highway at Wilson Gulch will be replaced with a bridge to accommodate a wildlife crossing, but this will be within existing highway right of way. Because the segment is non-supporting, the alternative results in *no adverse effect*.

Property at 15575 South US Highway 55 (5LP10844): This property is located west of US Highway 550. La Plata County assessor information indicates there is a residence and two sheds dating to 1949 on the parcel; however a site visit revealed that there are no buildings on the property. Because there are no longer any buildings on the property, it is considered not eligible, which results in a finding of *no historic properties affected*.

Webb Ranch (5LP8461): In the 2010 consultation for this property under Revised G Modified, CDOT determined there would be an adverse effect based on the construction of a new highway alignment through the ranch and its effects on the setting, feeling, and association of the property. The acreage of the impact was not included in that consultation letter so this submittal clarifies that approximately 41.5 acres of ROW is needed from the ranch. None of the buildings would be affected by this alternative. There is still an *adverse effect* to this property based on this updated effect information.

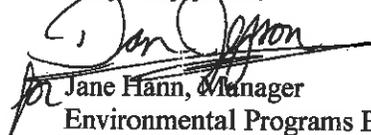
Craig Limousin Ranch (5LP9307): In the 2010 consultation for this property under Revised G Modified, CDOT determined that there would be a direct effect to 22.7 acres of the ranch on its western boundary, resulting in an adverse effect. This evaluation was based on a common termini for the alternatives evaluated in the Section 4(f) evaluation. This common termini was erroneously applied to the effects determination for the Craig Ranch for Alternative Revised G Modified in the December 2010 consultation. Without the common termini, the effect to the ranch would consist of 3.43 acres. There is still an *adverse effect* to this property based on this updated effect information.

It is the judgment of the Federal Highway Administration and CDOT that all the NRHP eligible archaeological sites listed herein or otherwise part of the previous consultation process for the US 550/160 undertaking are significant chiefly because of what can be learned by data recovery, and therefore they have minimal value for preservation in place. As a result, none of those localities qualify for preservation under Section 4(f) of the US Department of Transportation Act of 1966, as codified in 23 CFR 774.13(b)(1&2).

This information has been forwarded concurrently to the other consulting parties and SHPO for review.

As a Section 106 consulting party, we welcome your comments on these findings. Should you elect to respond, we request that you do so within 30 days of receipt of these materials. If we do not hear from you within that time frame we will assume you do not plan to comment. Please contact CDOT Senior Staff Historian Lisa Schoch at (303) 512-4258 or lisa.schoch@state.co.us, or Senior Staff Archaeologist Dan Jepson at (303) 757-9631 or daniel.jepson@state.co.us, if you have questions or require additional information.

Very truly yours,


Jane Hann, Manager
Environmental Programs Branch

Enclosures Survey Report and Site Forms for Alternative R5
Exhibits 7-8, 7-9 & 7-10
APE map, RGM6
Individual Site Forms (5LP6695.1, 5LP7759, 5LP7874)
Revised APE map for R5



COLORADO
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January 20, 2015

Mr. Philip S. Craig
9361 Highway 550
Durango, CO 81303-7862

Subject: Determinations of Eligibility and Effects, Alternatives R5 and RGM6, US Highway 550 South Connection to US Highway 160, La Plata County

Dear Mr. Craig:

This letter and the attached materials constitute a request for comments on determinations of eligibility and effects for the project referenced above. We previously conducted Section 106 consultation regarding eligibility and effects for various alternatives between 2009 and 2011. A consulting party meeting was held in Durango in November 2011 and a Memorandum of Agreement (MOA) was executed in 2012. The Section 106 process was documented in the 2012 US 550 South Connection to US 160 Supplemental Final Environmental Impact Statement (SFEIS)/Section 4(f) Evaluation for the US Highway 160 from Durango to Bayfield EIS. In response to public comment and in an effort to be unbiased and transparent regarding the alternatives, CDOT commissioned an in-depth analysis to evaluate the best alternative to connect US 550 from south of County Road 220 north to US 160. This Independent Alternatives Analysis (IAA) was completed by a consultant team including AMEC Environment and Infrastructure, Muller Engineering Company, and other specialty consultants.

As a result of the IAA, a new preferred alternative has been identified (RGM6). This submittal includes the following updates to historic properties:

1. Updated information about the historic background of the Co-op Ditch segment 5LP9257.2.
2. Alternative R5—Eligibility and Effects. New Alternative R5 was developed and additional survey was completed by consultant HDR to address new properties west of US Highway 550. Note that additional survey for archaeological resources was not completed for this or the other newly designed alternative (RGM6), as all areas proposed for direct effects were either previously inventoried or located on steep, highly eroded slopes that preclude the presence of intact archaeological remains.
3. Alternative RGM6—Eligibility and Effects Determinations. The Preferred Alternative (Revised G Modified) identified in the 2012 SFEIS has been re-designed as Alternative RGM6. The resource base for Alternative RGM6 largely matches that of Revised G Modified, but updated effects determinations have been developed to address the differences between the two.
4. Alternative Revised G Modified—updated Eligibility and Effects Determinations. The Revised G Modified alternative was identified as the preferred alternative in the SFEIS. It has been determined that properties west of US Highway 550 would be affected by Revised G Modified,

but these effects were not discussed in the 2010 consultation for that alternative. This update also includes revisions to the effects information for the historic Webb and Craig Ranches.

1. Clarification, Mason Lateral

In the consultation for the Eastern Realignment Alternative in November 2009, CDOT identified the Co-op Ditch under site number 5LP9257, with two segments evaluated (5LP9257.1 and 5LP9257.2). The ditch was also addressed in the analysis for the Revised F Modified and Revised G Alternatives in December 2010. For all of the previous consultation efforts, there was a finding of *no adverse effect*. Additional research has found that segment 5LP9257.2 south of County Road 220 is actually the Mason Lateral, which has a slightly different history, but maintains the location of the ditch identified as the Co-op Ditch in the 2009 consultation. The site number assigned to the Mason Lateral in 2002—5LP6695.1—has been assigned to this ditch and a new set of site forms is attached.

The former Co-op Ditch (5LP9752.2) was included in the evaluation of effects for Revised G Modified in 2010. The previous consultations indicated that 488 feet of the ditch would be affected as a result of widening the highway from two to four lanes. This effect was based on a common termini developed for alternatives evaluated in the Section 4(f) evaluation. This common termini was applied erroneously to the effects determinations under Section 106. Without the common termini, the ditch segment is south of where the improvements for Revised G Modified would end, and there would be no effect to the ditch, resulting in a finding of *no historic properties affected* for Revised G Modified for this resource. See the attached graphic showing the Revised G Modified alternative for more information about its location relative to the Mason Lateral.

2. Alternative R5

Alternative Description: Alternative R5 is a design variation of Alternative R submitted to CDOT during the public comment period for the 2012 SFEIS. It was modified during the 2014 IAA to meet a higher design speed and deviates from US 550 to meet that criterion. Alternative R5 includes a modified diamond interchange with US Highway 160. See Exhibit 7-8 for more information about the location of this alternative.

Survey Report Corrections: Please note that there are some handwritten corrections in the attached survey report that reflect new information collected after the report was printed. A list of page numbers and a description of the revised content follow:

pp. 26 (Table 3), 45 (Table 4), 46 (Table 5): The report indicates that the Foster property is being treated as NRHP eligible; however, after the report was finalized a field visit revealed that there are no longer any buildings on the property to evaluate and the property is therefore *not eligible*.

p. 46 (Table 4): Denver & Rio Grande Railroad (5LP1131.21): The entire railroad is considered eligible. The documented segment is non-supporting.

pp. 6 (Table 1), 19 (Table 2), 45 (Table 4), 46 (Table 5): The Office of Archaeology and Historic Preservation (OAH) Compass database indicates that US Highway 550/State Highway 19 (5LP6654) is field eligible. It is not officially eligible as noted in the tables. US Highway 160 (5LP10654) was just evaluated as part of the survey for the R5 Alternative and is considered eligible. It is not officially eligible as noted in the table.

Area of Potential Effects: The APE for this survey was based on design parameters of proposed Alternative R5 and to address the potential for direct and indirect effects to historic properties. The APE boundary encompasses the alternative footprint as well as adjacent parcel boundaries and topographic features. For more information about the APE for Alternative R5, please see pp. 3-4 of the enclosed report as well as the updated map, which shows the APE boundary extending south to include the entire historic property boundary of the Craig Ranch.

Eligibility Determinations: Eleven properties were evaluated for the Alternative R5 survey. Of these, three architectural properties were newly-documented and determined not eligible. An additional property—the Foster Residence at 15575 South US Highway 550—was assigned site number 5LP10844 and was initially identified as an architectural property with assessor information indicating there were several buildings on the parcel dating to 1949. However, a site visit revealed that the buildings are no longer extant and this property was determined not eligible. US Highway 160 (segment 5LP10654.1) was also newly documented; the entire highway is considered eligible but the segment lacks integrity and is non-supporting.

Four previously-recorded resources were documented on site forms as part of this survey effort. A segment of the Denver & Rio Grande Railroad (5LP1131.21) was evaluated; the entire railroad is considered eligible, but the segment lacks integrity and is non-supporting. Re-visitation forms were completed for Bridge/Railroad Ties (5LP7759) and Farm Equipment (5LP7874); the field survey indicates they are no longer extant and are not eligible. A segment of the Mason Lateral (5LP6695.1) was also documented, as discussed above.

The following table summarizes the eligibility determinations for the surveyed properties as well as previously documented archaeological sites. Additional information about these properties (minus the archaeological resources) is provided in the attached survey report.

Site Number	Address/Property Name	Construction Date	Eligibility Determination
5LP1131.21	Denver & Rio Grande Railroad segment	1881	Entire resource is eligible; Non-Supporting segment
5LP2223	Prehistoric archaeological site	N/A	Eligible
5LP6670	Prehistoric archaeological site	N/A	Eligible
5LP6695.1	Mason Lateral	1901	Entire ditch eligible; Supporting segment
5LP7759	Bridge/Railroad Ties	Unknown	No longer extant; Not Eligible
5LP7874	Farm Equipment	Circa 1930-1940	No longer extant; Not Eligible
5LP10844	15575 South US Highway 550; Foster residence	1949	Buildings no longer extant; Not Eligible
5LP10645	16073 S US Highway 550	1956	Not Eligible
5LP10646	27055 E US Highway 160	1958	Not Eligible
5LP10648	27653 E US Highway 160	1952	Not Eligible
5LP 10654.1	US Highway 160 segment	1916-1926, 1938	Entire highway eligible; Non Supporting segment

An additional ten previously-recorded properties are present within the APE, including another segment of the D&RG railroad (5LP1131.8), which is now represented by 5LP1131.21. As noted above, no additional archaeological survey was required and the two known archaeological sites were not re-visited; eligibility determinations for those properties remain unchanged and effects determinations for this alternative were made based on the new design plans.

The previously documented properties with official eligibility determinations were not re-evaluated on site forms, and are shown in the shaded area of the table below. These resources (minus the two archaeological sites) are also listed on p. 6, Table 1 of the enclosed survey report. The eligibility status of these properties was verified in the OAHP Compass database and dates of official determinations of eligibility are included. Based on the 2014 Section 106 Programmatic Agreement executed by CDOT, the State Historic Preservation Officer (SHPO), the Federal Highway Administration (FHWA), and the Advisory Council on Historic Preservation (ACHP), CDOT may rely on the previous determination for officially not eligible properties unless alterations warrant re-evaluation or the property was less than 50 years old when it was determined not eligible.

Effects determinations for newly documented and previously documented properties are summarized in the table below. There is also additional information for select properties below the table. Properties evaluated for the R5 Alternative are noted in the table and site forms for those resources are enclosed.

Effects Determinations

Site Number	Address/Property Name	Eligibility Determination	Effects Determination
5LP1131.21	Denver & Rio Grande Railroad segment	Entire resource is Eligible; Non-Supporting segment (R5 Survey)	Direct effect to 4,000 feet of the railroad due to new access road to gravel pit. No Adverse Effect; *see additional information below.
5LP2223	Prehistoric archaeological site	Officially Eligible, 2000	Adverse Effect
5LP6670	Prehistoric archaeological site	Officially Eligible, 2002	Adverse Effect
5LP5649	27561 US 160	Officially Not Eligible, 2000	No Historic Properties Affected
5LP5650	26796 US 160	Officially Not Eligible, 2000	No Historic Properties Affected
5LP5651	26796 US 160	Officially Not Eligible, 2000	No Historic Properties Affected
5LP6632—segments 5LP6632.4, 5LP6632.5, 5LP6632.6	Aztec to Durango Road	Entire road Officially Not Eligible 2002; segments Field Not Eligible	No Historic Properties Affected
5LP6654.1	US Highway 550 Segment	Entire segment Officially Not Eligible, 2011	No Historic Properties Affected
5LP6669	Trash Dump	Officially Not Eligible, 2002	No Historic Properties Affected
5LP6695.1	Mason Lateral (formerly Co-op Ditch)	Eligible, supporting segment (R5 Survey)	Within APE but outside the area of improvements; No Historic Properties Affected
5LP7759	Bridge, railroad ties	Not Eligible—no longer extant (R5 Survey)	No Historic Properties Affected
5LP7873	Corral	Officially Not Eligible, 2005	No Historic Properties Affected
5LP7874	Farm Equipment	Field Not Eligible—no longer extant (R5 Survey)	No Historic Properties Affected
5LP8461	Webb Ranch	Officially Eligible, 2010	Direct effect to 5.2 acres of ranch along western edge, Adverse Effect
5LP8911	Denver & Rio Grande Railroad Trestle—Farmington Branch	Officially Eligible, 2009	Trestle is within the broader APE but will not be affected. No Historic Properties Affected.
5LP9307	Craig Ranch and Hollywood Dairy, Craig Limousin Ranch	Officially Eligible, 2010	Direct effect to 6.9 acres of ranch along western edge, Adverse Effect
5LP10645	16073 S US Highway 550	Not Eligible (R5 Survey)	ROW includes 1 acre north of US 550, 5.9 acres south of US 550, and removal of all buildings on property. No Historic Properties Affected
5LP10646	27055 E US Highway 160	Not Eligible (R5 Survey)	Change to access. No Historic Properties Affected
5LP10648	27653 E US Highway 160	Not Eligible (R5 Survey)	Effects to 1.9 acres of the property for gravel pit

Site Number	Address/Property Name	Eligibility Determination	Effects Determination
			access. This total includes both easements and ROW. No Historic Properties Affected.
5LP 10654.1	US Highway 160 segment	Entire highway Eligible; Non Supporting segment (R5 Survey)	Widening to 20 feet for auxiliary lanes for new ramps. Replacement of Concrete Box Culvert. No Adverse Effect; *see additional information below.
5LP10844	15575 South US Highway 550	Vacant Parcel, Not Eligible (R5 Survey)	No Historic Properties Affected; *see additional information below.

Denver & Rio Grande Railroad (5LP1131.21): The overall railroad is eligible but segment 5LP1131.21 lacks integrity. The railroad is located north of US Highway 160. Currently, parts of the former railroad segment are being used as an access to an existing gravel pit operation. Access to the gravel pit would be affected by construction of the interchange under the R5 Alternative. The new proposed access road to the gravel pit would directly affect 4,000 ft. of the railroad segment. Because the segment lacks integrity, there is a finding of *no adverse effect*.

Webb Ranch (5LP8461): There would be a direct effect to the Webb Ranch as the new highway alignment extends along the western edge of the boundary. Although the buildings would be avoided, the highway represents a new visual element in the ranch setting and will compromise the feeling, setting, and association of the property. A total of 5.2 acres along the western property boundary would be required. CDOT has determined that this alternative results in an *adverse effect*.

Craig Ranch (5LP9307): US 550 would be widened from two to four lanes along the historic ranch boundary and the alternative would require 6.9 acres along the western property boundary from County Road 220 and south along the US 550 alignment as noted in the attached graphic of R5 (Exhibit 7-8). No ranch buildings would be directly affected by the acquisition but open ranch land along the western property boundary would be acquired. These effects diminish the setting, feeling, and association of the ranch. Based on this, CDOT has determined that Alternative R5 results in an *adverse effect* to the Craig Limousin Ranch.

US Highway 160 (5LP10654.1): The entire highway is eligible but the segment in the project area is not supporting. The highway would be widened a total of 20 feet for acceleration/deceleration lanes. An existing concrete box culvert under the highway at Wilson Gulch would be replaced with a bridge to accommodate a wildlife crossing, but this will be within existing highway right of way. Because the segment is non-supporting, the alternative results in *no adverse effect*.

Property at 15575 South US Highway 550 (5LP10844): This property is located west of US Highway 550 and was initially identified as a residential property. La Plata County assessor information indicates there is a residence and two sheds dating to 1949 on the parcel; however a site visit revealed that no buildings are present. Because there are no longer any buildings on the property, it is considered not eligible. An aerial photo showing the building that was once on the parcel is included herewith, along with a photo of the current property. The alternative results in *no historic properties affected*.

3. Alternative RGM6 (Preferred Alternative)

Alternative Description: This alternative is a refinement of Revised G Modified, which was identified as the Preferred Alternative in the SFEIS; Revised G Modified was enhanced during the 2014 Independent Alternatives Analysis and renamed Revised G Modified 6 (RGM6). It connects US 550 to US 160 via the

existing Grandview Interchange, and includes two through lanes in each direction through the Grandview Section of US 160. Further refinement shifted the alternative to the west to avoid more of the irrigated farmland of the Webb Ranch (5LP8461) and thereby reduce impacts to that historic property. For more information refer to Exhibit 7-10. A graphic showing the Revised G Modified alternative (Exhibit 7-9) is included for comparative purposes.

Area of Potential Effects: The APE for this alternative includes the project footprint plus the parcels directly affected by the alternative, as noted on the attached APE map.

Eligibility Determinations: Properties affected by this alternative were identified during the 2009-2011 consultations for Revised G Modified, and include the officially eligible historic Webb Ranch (5LP8461) and Craig Ranch (5LP9307), as well as properties south of County Road 220 and west of US 550 that were recently identified as part of the Alternative R5 survey noted above. Because the status of the previously documented properties (Webb Ranch, Craig Ranch, the US 550 segment, and five archaeological sites) has not changed, new site forms were not completed. Some properties that were identified in the Alternative R5 survey will also be affected by RGM6; these are noted in the following table, which includes properties within the APE for Alternative RGM6:

Site Number	Address/Property Name	Construction Date	Eligibility Determination
5LP2223	Prehistoric archaeological site	N/A	Eligible
5LP6654.1	US Highway 550	1924-1934	Officially Not Eligible, 2011
5LP6670	Prehistoric archaeological site	N/A	Eligible
5LP6695.1	Mason Lateral (formerly Co-op Ditch)	1901	Eligible, supporting segment (R5 Survey)
5LP8461	Webb Ranch		Officially Eligible, 2010
5LP8911	Denver & Rio Grande Railroad Trestle-Farmington Branch		Officially Eligible, 2009
5LP9307	Craig Ranch		Officially Eligible, 2010
5LP9587	Prehistoric archaeological site	N/A	Eligible
5LP9588	Prehistoric archaeological site	N/A	Eligible
5LP9590	Prehistoric archaeological site	N/A	Eligible
5LP10844	15575 South US Highway 550	1949	No buildings on property, Not Eligible
5LP10645	16073 S US Highway 550	1956	Not Eligible (R5 Survey)
5LP 10654.1	US Highway 160 segment	1916-1926, 1938	Entire highway Eligible; Non-Supporting segment (R5 Survey)

Effects Determinations

Site Number	Address/Property Name	Eligibility Determination	Effects Determination
5LP2223	Prehistoric archaeological site	Officially Eligible, 2000	Adverse Effect
5LP6654.1	US Highway 550	Officially Not Eligible, 2011	No Historic Properties Affected
5LP6670	Prehistoric archaeological site	Officially Eligible, 2002	Adverse Effect
5LP6695.1	Mason Lateral (formerly Co-op Ditch)	Eligible, supporting segment (R5 Survey)	Ditch will not be affected. No Historic Properties Affected.
5LP8461	Webb Ranch	Officially Eligible, 2010	Direct effect to 31.8 acres along west edge, Adverse Effect. *See additional information below
5LP8911	Denver & Rio Grande Railroad Trestle—Farmington Branch	Officially Eligible, 2009	Within APE but located on far western edge. Will not be directly or indirectly

Site Number	Address/Property Name	Eligibility Determination	Effects Determination
			affected; No Historic Properties Affected
5LP9307	Craig Ranch	Officially Eligible, 2010	Direct effect to 12.6 acres of ranch along western edge; Adverse Effect. *See additional information below
5LP9587	Prehistoric archaeological site	Officially Eligible, 2010	Adverse Effect
5LP9588	Prehistoric archaeological site	Officially Eligible, 2010	Adverse Effect
5LP9590	Prehistoric archaeological site	Officially Eligible, 2010	Adverse Effect
5LP10844	15575 South US Highway 550	Vacant Parcel, Not Eligible (R5 survey)	No Historic Properties Affected, *See additional information below.
5LP10645	16073 S US Highway 550	Not Eligible (R5 Survey)	1.88 acres of impact north of US 550. 1.0 acre of impact south of US 550. No historic properties affected
5LP 10654.1	US Highway 160 segment	Entire highway eligible; Non Supporting segment (R5 Survey)	Replacement of concrete box culvert at Wilson Gulch within right of way. No Adverse Effect. *See additional information below

Webb Ranch (5LP8461): There will be a direct effect to the Webb Ranch as the new highway alignment extends along the western edge of the boundary. Although the buildings will be avoided, the highway represents a new visual element in the ranch setting and will compromise the feeling, setting and association of the property. A total of 31.8 acres along the western property boundary will be required. CDOT has determined that this alternative results in an *adverse effect*.

Craig Ranch (5LP9307): US 550 will be widened from two to four lanes along the historic ranch boundary and the alternative will require 12.6 acres along the western property boundary from County Road 220 and south along the US 550 alignment as noted in the attached graphic of RGM6. No ranch buildings will be directly affected by the acquisition but open ranch land along the western property boundary will be acquired and the widened US 550 alignment will be closer to the ranch buildings. These effects diminish the setting, feeling and association of the ranch. Based on this, CDOT has determined that Alternative RGM6 results in an *adverse effect* to the Craig Limousin Ranch.

US Highway 160 (5LP10654.1): The entire highway is eligible but the segment in the project area is not supporting. An existing concrete box culvert under the highway at Wilson Gulch will be replaced with a bridge to accommodate a wildlife crossing, but this will be within existing highway right of way. Because the segment is non-supporting, the alternative results in *no adverse effect*.

Property at 15575 South US Highway 55 (5LP10844): This property is located west of US Highway 550 and was assigned a site number. La Plata County assessor information indicates there is a residence and two sheds dating to 1949 on the parcel; however a site visit revealed that there are no buildings present. Because there are no longer any buildings on the property, it is considered not eligible. A map of the property showing the building that was once on the parcel is included along with a photo of its

present condition. The property is not eligible so the alternative results in a finding of *no historic properties affected*.

4. Revised G Modified Alternative

Alternative Description: As noted above, this alternative was identified as Preferred in the SFEIS; however, it has been re-designed as RGM6, which is the new Preferred Alternative. In the 2010 consultation for this alternative there were some properties south of County Road 220 and west of US Highway 550 that were not assessed for effects. Some of these properties were recently evaluated during the survey for Alternative R5, and those site forms are part of this submittal. Only properties that weren't addressed in previous consultation or that required updates to effects information are included in this section, including archaeological sites 5LP6670, 5LP9588, 5LP9589 and 5LP9590. This alternative connects US Highway 550 to US Highway 160 via the Grandview Interchange and includes two through lanes in each direction. Please see Exhibit 7-9 for more information about the alternative.

Effects Determinations

Site Number	Address/Property Name	Eligibility Determination	Effect Determination
5LP1131.21	Denver & Rio Grande Railroad	Eligible (R5 Survey)	All improvements are south of US 160 so there are no effects. No Historic Properties Affected.
5LP6695.1	Mason Lateral (formerly Co-op Ditch)	Entire ditch eligible; supporting segment	Ditch is located south of improvements. No historic properties affected. *See additional information below
5LP8461	Webb Ranch	Officially Eligible, 2010	Direct effect to 41.5 acres of land; Adverse Effect. *See additional information below
5LP9307	Craig Limousin Ranch	Officially Eligible, 2010	Direct effect to 3.43 acres, Adverse Effect. *See additional information below
5LP10844	15575 South US Highway 550	Vacant Parcel, Not Eligible (R5 Survey)	No Historic Properties Affected. *See additional information below.
5LP10645	16073 S US Highway 550	Not Eligible (R5 Survey)	This alternative directly affects 0.13 acres. No historic properties affected
5LP 10654.1	US Highway 160 segment	Entire highway Eligible; Non Supporting segment (R5 Survey)	Replacement of concrete box culvert at Wilson Gulch within right of way; No Adverse Effect. *See additional information below.

Mason Lateral (5LP6695.1): As noted earlier, the Mason Lateral segment (formerly the Co-op Ditch) was evaluated for effects from Revised G Modified in 2010 and was found to result in a direct effect to 488 feet of the ditch. This effect was based on a common termini that was identified for alternatives evaluated in the Section 4(f) evaluation. This common termini was applied erroneously to the effect determinations under Section 106. Without the common termini, the ditch segment is south of where the improvements for Revised G Modified would end, and there would be no effect to the ditch, resulting in a finding of *no historic properties affected* for Revised G Modified for this resource.

US Highway 160 (5LP10654.1): The entire highway is eligible but the segment in the project area is not supporting. An existing concrete box culvert under the highway at Wilson Gulch will be replaced with a bridge to accommodate a wildlife crossing, but this will be within existing highway right of way. Because the segment is non-supporting, the alternative results in *no adverse effect*.

Property at 15575 South US Highway 55 (5LP10844): This property is located west of US Highway 550. La Plata County assessor information indicates there is a residence and two sheds dating to 1949 on the parcel; however a site visit revealed that there are no buildings on the property. Because there are no longer any buildings on the property, it is considered not eligible, which results in a finding of *no historic properties affected*.

Webb Ranch (5LP8461): In the 2010 consultation for this property under Revised G Modified, CDOT determined there would be an adverse effect based on the construction of a new highway alignment through the ranch and its effects on the setting, feeling, and association of the property. The acreage of the impact was not included in that consultation letter so this submittal clarifies that approximately 41.5 acres of ROW is needed from the ranch. None of the buildings would be affected by this alternative. There is still an *adverse effect* to this property based on this updated effect information.

Craig Limousin Ranch (5LP9307): In the 2010 consultation for this property under Revised G Modified, CDOT determined that there would be a direct effect to 22.7 acres of the ranch on its western boundary, resulting in an adverse effect. This evaluation was based on a common termini for the alternatives evaluated in the Section 4(f) evaluation. This common termini was erroneously applied to the effects determination for the Craig Ranch for Alternative Revised G Modified in the December 2010 consultation. Without the common termini, the effect to the ranch would consist of 3.43 acres. There is still an *adverse effect* to this property based on this updated effect information.

It is the judgment of the Federal Highway Administration and CDOT that all the NRHP eligible archaeological sites listed herein or otherwise part of the previous consultation process for the US 550/160 undertaking are significant chiefly because of what can be learned by data recovery, and therefore they have minimal value for preservation in place. As a result, none of those localities qualify for preservation under Section 4(f) of the US Department of Transportation Act of 1966, as codified in 23 CFR 774.13(b)(1&2).

This information has been forwarded concurrently to the other consulting parties and SHPO for review.

As a Section 106 consulting party, we welcome your comments on these findings. Should you elect to respond, we request that you do so within 30 days of receipt of these materials. If we do not hear from you within that time frame we will assume you do not plan to comment. Please contact CDOT Senior Staff Historian Lisa Schoch at (303) 512-4258 or lisa.schoch@state.co.us, or Senior Staff Archaeologist Dan Jepson at (303) 757-9631 or daniel.jepson@state.co.us, if you have questions or require additional information.

Very truly yours,


Jane Hann, Manager
Environmental Programs Branch

Enclosures Survey Report and Site Forms for Alternative R5
Exhibits 7-8, 7-9 & 7-10
APE map, RGM6
Individual Site Forms (5LP6695.1, 5LP7759, 5LP7874)
Revised APE map for R5



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January 20, 2015

Mr. Joel Craig
14898 Highway 550
Durango, CO 81303-6628

Subject: Determinations of Eligibility and Effects, Alternatives R5 and RGM6, US Highway 550 South Connection to US Highway 160, La Plata County

Dear Mr. Craig:

This letter and the attached materials constitute a request for comments on determinations of eligibility and effects for the project referenced above. We previously conducted Section 106 consultation regarding eligibility and effects for various alternatives between 2009 and 2011. A consulting party meeting was held in Durango in November 2011 and a Memorandum of Agreement (MOA) was executed in 2012. The Section 106 process was documented in the 2012 US 550 South Connection to US 160 Supplemental Final Environmental Impact Statement (SFEIS)/Section 4(f) Evaluation for the US Highway 160 from Durango to Bayfield EIS. In response to public comment and in an effort to be unbiased and transparent regarding the alternatives, CDOT commissioned an in-depth analysis to evaluate the best alternative to connect US 550 from south of County Road 220 north to US 160. This Independent Alternatives Analysis (IAA) was completed by a consultant team including AMEC Environment and Infrastructure, Muller Engineering Company, and other specialty consultants.

As a result of the IAA, a new preferred alternative has been identified (RGM6). This submittal includes the following updates to historic properties:

1. Updated information about the historic background of the Co-op Ditch segment 5LP9257.2.
2. Alternative R5—Eligibility and Effects. New Alternative R5 was developed and additional survey was completed by consultant HDR to address new properties west of US Highway 550. Note that additional survey for archaeological resources was not completed for this or the other newly designed alternative (RGM6), as all areas proposed for direct effects were either previously inventoried or located on steep, highly eroded slopes that preclude the presence of intact archaeological remains.
3. Alternative RGM6—Eligibility and Effects Determinations. The Preferred Alternative (Revised G Modified) identified in the 2012 SFEIS has been re-designed as Alternative RGM6. The resource base for Alternative RGM6 largely matches that of Revised G Modified, but updated effects determinations have been developed to address the differences between the two.
4. Alternative Revised G Modified—updated Eligibility and Effects Determinations. The Revised G Modified alternative was identified as the preferred alternative in the SFEIS. It has been determined that properties west of US Highway 550 would be affected by Revised G Modified,

but these effects were not discussed in the 2010 consultation for that alternative. This update also includes revisions to the effects information for the historic Webb and Craig Ranches.

1. Clarification, Mason Lateral

In the consultation for the Eastern Realignment Alternative in November 2009, CDOT identified the Co-op Ditch under site number 5LP9257, with two segments evaluated (5LP9257.1 and 5LP9257.2). The ditch was also addressed in the analysis for the Revised F Modified and Revised G Alternatives in December 2010. For all of the previous consultation efforts, there was a finding of *no adverse effect*. Additional research has found that segment 5LP9257.2 south of County Road 220 is actually the Mason Lateral, which has a slightly different history, but maintains the location of the ditch identified as the Co-op Ditch in the 2009 consultation. The site number assigned to the Mason Lateral in 2002—5LP6695.1—has been assigned to this ditch and a new set of site forms is attached.

The former Co-op Ditch (5LP9752.2) was included in the evaluation of effects for Revised G Modified in 2010. The previous consultations indicated that 488 feet of the ditch would be affected as a result of widening the highway from two to four lanes. This effect was based on a common termini developed for alternatives evaluated in the Section 4(f) evaluation. This common termini was applied erroneously to the effects determinations under Section 106. Without the common termini, the ditch segment is south of where the improvements for Revised G Modified would end, and there would be no effect to the ditch, resulting in a finding of *no historic properties affected* for Revised G Modified for this resource. See the attached graphic showing the Revised G Modified alternative for more information about its location relative to the Mason Lateral.

2. Alternative R5

Alternative Description: Alternative R5 is a design variation of Alternative R submitted to CDOT during the public comment period for the 2012 SFEIS. It was modified during the 2014 IAA to meet a higher design speed and deviates from US 550 to meet that criterion. Alternative R5 includes a modified diamond interchange with US Highway 160. See Exhibit 7-8 for more information about the location of this alternative.

Survey Report Corrections: Please note that there are some handwritten corrections in the attached survey report that reflect new information collected after the report was printed. A list of page numbers and a description of the revised content follow:

pp. 26 (Table 3), 45 (Table 4), 46 (Table 5): The report indicates that the Foster property is being treated as NRHP eligible; however, after the report was finalized a field visit revealed that there are no longer any buildings on the property to evaluate and the property is therefore *not eligible*.

p. 46 (Table 4): Denver & Rio Grande Railroad (5LP1131.21): The entire railroad is considered eligible. The documented segment is non-supporting.

pp. 6 (Table 1), 19 (Table 2), 45 (Table 4), 46 (Table 5): The Office of Archaeology and Historic Preservation (OAHP) Compass database indicates that US Highway 550/State Highway 19 (5LP6654) is field eligible. It is not officially eligible as noted in the tables. US Highway 160 (5LP10654) was just evaluated as part of the survey for the R5 Alternative and is considered eligible. It is not officially eligible as noted in the table.

Area of Potential Effects: The APE for this survey was based on design parameters of proposed Alternative R5 and to address the potential for direct and indirect effects to historic properties. The APE boundary encompasses the alternative footprint as well as adjacent parcel boundaries and topographic features. For more information about the APE for Alternative R5, please see pp. 3-4 of the enclosed report as well as the updated map, which shows the APE boundary extending south to include the entire historic property boundary of the Craig Ranch.

Eligibility Determinations: Eleven properties were evaluated for the Alternative R5 survey. Of these, three architectural properties were newly-documented and determined not eligible. An additional property—the Foster Residence at 15575 South US Highway 550—was assigned site number 5LP10844 and was initially identified as an architectural property with assessor information indicating there were several buildings on the parcel dating to 1949. However, a site visit revealed that the buildings are no longer extant and this property was determined not eligible. US Highway 160 (segment 5LP10654.1) was also newly documented; the entire highway is considered eligible but the segment lacks integrity and is non-supporting.

Four previously-recorded resources were documented on site forms as part of this survey effort. A segment of the Denver & Rio Grande Railroad (5LP1131.21) was evaluated; the entire railroad is considered eligible, but the segment lacks integrity and is non-supporting. Re-visitation forms were completed for Bridge/Railroad Ties (5LP7759) and Farm Equipment (5LP7874); the field survey indicates they are no longer extant and are not eligible. A segment of the Mason Lateral (5LP6695.1) was also documented, as discussed above.

The following table summarizes the eligibility determinations for the surveyed properties as well as previously documented archaeological sites. Additional information about these properties (minus the archaeological resources) is provided in the attached survey report.

Site Number	Address/Property Name	Construction Date	Eligibility Determination
5LP1131.21	Denver & Rio Grande Railroad segment	1881	Entire resource is eligible; Non-Supporting segment
5LP2223	Prehistoric archaeological site	N/A	Eligible
5LP6670	Prehistoric archaeological site	N/A	Eligible
5LP6695.1	Mason Lateral	1901	Entire ditch eligible; Supporting segment
5LP7759	Bridge/Railroad Ties	Unknown	No longer extant; Not Eligible
5LP7874	Farm Equipment	Circa 1930-1940	No longer extant; Not Eligible
5LP10844	15575 South US Highway 550; Foster residence	1949	Buildings no longer extant; Not Eligible
5LP10645	16073 S US Highway 550	1956	Not Eligible
5LP10646	27055 E US Highway 160	1958	Not Eligible
5LP10648	27653 E US Highway 160	1952	Not Eligible
5LP 10654.1	US Highway 160 segment	1916-1926, 1938	Entire highway eligible; Non Supporting segment

An additional ten previously-recorded properties are present within the APE, including another segment of the D&RG railroad (5LP1131.8), which is now represented by 5LP1131.21. As noted above, no additional archaeological survey was required and the two known archaeological sites were not re-visited; eligibility determinations for those properties remain unchanged and effects determinations for this alternative were made based on the new design plans.

The previously documented properties with official eligibility determinations were not re-evaluated on site forms, and are shown in the shaded area of the table below. These resources (minus the two archaeological sites) are also listed on p. 6, Table 1 of the enclosed survey report. The eligibility status of these properties was verified in the OAHF Compass database and dates of official determinations of eligibility are included. Based on the 2014 Section 106 Programmatic Agreement executed by CDOT, the State Historic Preservation Officer (SHPO), the Federal Highway Administration (FHWA), and the Advisory Council on Historic Preservation (ACHP), CDOT may rely on the previous determination for officially not eligible properties unless alterations warrant re-evaluation or the property was less than 50 years old when it was determined not eligible.

Effects determinations for newly documented and previously documented properties are summarized in the table below. There is also additional information for select properties below the table. Properties evaluated for the R5 Alternative are noted in the table and site forms for those resources are enclosed.

Effects Determinations

Site Number	Address/Property Name	Eligibility Determination	Effects Determination
5LP1131.21	Denver & Rio Grande Railroad segment	Entire resource is Eligible; Non-Supporting segment (R5 Survey)	Direct effect to 4,000 feet of the railroad due to new access road to gravel pit. No Adverse Effect; *see additional information below.
5LP2223	Prehistoric archaeological site	Officially Eligible, 2000	Adverse Effect
5LP6670	Prehistoric archaeological site	Officially Eligible, 2002	Adverse Effect
5LP5649	27561 US 160	Officially Not Eligible, 2000	No Historic Properties Affected
5LP5650	26796 US 160	Officially Not Eligible, 2000	No Historic Properties Affected
5LP5651	26796 US 160	Officially Not Eligible, 2000	No Historic Properties Affected
5LP6632—segments 5LP6632.4, 5LP6632.5, 5LP6632.6	Aztec to Durango Road	Entire road Officially Not Eligible 2002; segments Field Not Eligible	No Historic Properties Affected
5LP6654.1	US Highway 550 Segment	Entire segment Officially Not Eligible, 2011	No Historic Properties Affected
5LP6669	Trash Dump	Officially Not Eligible, 2002	No Historic Properties Affected
5LP6695.1	Mason Lateral (formerly Co-op Ditch)	Eligible, supporting segment (R5 Survey)	Within APE but outside the area of improvements; No Historic Properties Affected
5LP7759	Bridge, railroad ties	Not Eligible—no longer extant (R5 Survey)	No Historic Properties Affected
5LP7873	Corral	Officially Not Eligible, 2005	No Historic Properties Affected
5LP7874	Farm Equipment	Field Not Eligible—no longer extant (R5 Survey)	No Historic Properties Affected
5LP8461	Webb Ranch	Officially Eligible, 2010	Direct effect to 5.2 acres of ranch along western edge, Adverse Effect
5LP8911	Denver & Rio Grande Railroad Trestle—Farmington Branch	Officially Eligible, 2009	Trestle is within the broader APE but will not be affected. No Historic Properties Affected.
5LP9307	Craig Ranch and Hollywood Dairy, Craig Limousin Ranch	Officially Eligible, 2010	Direct effect to 6.9 acres of ranch along western edge, Adverse Effect
5LP10645	16073 S US Highway 550	Not Eligible (R5 Survey)	ROW includes 1 acre north of US 550, 5.9 acres south of US 550, and removal of all buildings on property. No Historic Properties Affected
5LP10646	27055 E US Highway 160	Not Eligible (R5 Survey)	Change to access. No Historic Properties Affected
5LP10648	27653 E US Highway 160	Not Eligible (R5 Survey)	Effects to 1.9 acres of the property for gravel pit

Site Number	Address/Property Name	Eligibility Determination	Effects Determination
			access. This total includes both easements and ROW. No Historic Properties Affected.
SLP 10654.1	US Highway 160 segment	Entire highway Eligible; Non Supporting segment (R5 Survey)	Widening to 20 feet for auxiliary lanes for new ramps. Replacement of Concrete Box Culvert. No Adverse Effect; *see additional information below.
SLP10844	15575 South US Highway 550	Vacant Parcel, Not Eligible (R5 Survey)	No Historic Properties Affected; *see additional information below.

Denver & Rio Grande Railroad (5LP1131.21): The overall railroad is eligible but segment 5LP1131.21 lacks integrity. The railroad is located north of US Highway 160. Currently, parts of the former railroad segment are being used as an access to an existing gravel pit operation. Access to the gravel pit would be affected by construction of the interchange under the R5 Alternative. The new proposed access road to the gravel pit would directly affect 4,000 ft. of the railroad segment. Because the segment lacks integrity, there is a finding of *no adverse effect*.

Webb Ranch (5LP8461): There would be a direct effect to the Webb Ranch as the new highway alignment extends along the western edge of the boundary. Although the buildings would be avoided, the highway represents a new visual element in the ranch setting and will compromise the feeling, setting, and association of the property. A total of 5.2 acres along the western property boundary would be required. CDOT has determined that this alternative results in an *adverse effect*.

Craig Ranch (5LP9307): US 550 would be widened from two to four lanes along the historic ranch boundary and the alternative would require 6.9 acres along the western property boundary from County Road 220 and south along the US 550 alignment as noted in the attached graphic of R5 (Exhibit 7-8). No ranch buildings would be directly affected by the acquisition but open ranch land along the western property boundary would be acquired. These effects diminish the setting, feeling, and association of the ranch. Based on this, CDOT has determined that Alternative R5 results in an *adverse effect* to the Craig Limousin Ranch.

US Highway 160 (5LP10654.1): The entire highway is eligible but the segment in the project area is not supporting. The highway would be widened a total of 20 feet for acceleration/deceleration lanes. An existing concrete box culvert under the highway at Wilson Gulch would be replaced with a bridge to accommodate a wildlife crossing, but this will be within existing highway right of way. Because the segment is non-supporting, the alternative results in *no adverse effect*.

Property at 15575 South US Highway 550 (5LP10844): This property is located west of US Highway 550 and was initially identified as a residential property. La Plata County assessor information indicates there is a residence and two sheds dating to 1949 on the parcel; however a site visit revealed that no buildings are present. Because there are no longer any buildings on the property, it is considered not eligible. An aerial photo showing the building that was once on the parcel is included herewith, along with a photo of the current property. The alternative results in *no historic properties affected*.

3. Alternative RGM6 (Preferred Alternative)

Alternative Description: This alternative is a refinement of Revised G Modified, which was identified as the Preferred Alternative in the SFEIS; Revised G Modified was enhanced during the 2014 Independent Alternatives Analysis and renamed Revised G Modified 6 (RGM6). It connects US 550 to US 160 via the

existing Grandview Interchange, and includes two through lanes in each direction through the Grandview Section of US 160. Further refinement shifted the alternative to the west to avoid more of the irrigated farmland of the Webb Ranch (5LP8461) and thereby reduce impacts to that historic property. For more information refer to Exhibit 7-10. A graphic showing the Revised G Modified alternative (Exhibit 7-9) is included for comparative purposes.

Area of Potential Effects: The APE for this alternative includes the project footprint plus the parcels directly affected by the alternative, as noted on the attached APE map.

Eligibility Determinations: Properties affected by this alternative were identified during the 2009-2011 consultations for Revised G Modified, and include the officially eligible historic Webb Ranch (5LP8461) and Craig Ranch (5LP9307), as well as properties south of County Road 220 and west of US 550 that were recently identified as part of the Alternative R5 survey noted above. Because the status of the previously documented properties (Webb Ranch, Craig Ranch, the US 550 segment, and five archaeological sites) has not changed, new site forms were not completed. Some properties that were identified in the Alternative R5 survey will also be affected by RGM6; these are noted in the following table, which includes properties within the APE for Alternative RGM6:

Site Number	Address/Property Name	Construction Date	Eligibility Determination
5LP2223	Prehistoric archaeological site	N/A	Eligible
5LP6654.1	US Highway 550	1924-1934	Officially Not Eligible, 2011
5LP6670	Prehistoric archaeological site	N/A	Eligible
5LP6695.1	Mason Lateral (formerly Co-op Ditch)	1901	Eligible, supporting segment (R5 Survey)
5LP8461	Webb Ranch		Officially Eligible, 2010
5LP8911	Denver & Rio Grande Railroad Trestle-Farmington Branch		Officially Eligible, 2009
5LP9307	Craig Ranch		Officially Eligible, 2010
5LP9587	Prehistoric archaeological site	N/A	Eligible
5LP9588	Prehistoric archaeological site	N/A	Eligible
5LP9590	Prehistoric archaeological site	N/A	Eligible
5LP10844	15575 South US Highway 550	1949	No buildings on property, Not Eligible
5LP10645	16073 S US Highway 550	1956	Not Eligible (R5 Survey)
5LP 10654.1	US Highway 160 segment	1916-1926, 1938	Entire highway Eligible; Non-Supporting segment (R5 Survey)

Effects Determinations

Site Number	Address/Property Name	Eligibility Determination	Effects Determination
5LP2223	Prehistoric archaeological site	Officially Eligible, 2000	Adverse Effect
5LP6654.1	US Highway 550	Officially Not Eligible, 2011	No Historic Properties Affected
5LP6670	Prehistoric archaeological site	Officially Eligible, 2002	Adverse Effect
5LP6695.1	Mason Lateral (formerly Co-op Ditch)	Eligible, supporting segment (R5 Survey)	Ditch will not be affected. No Historic Properties Affected.
5LP8461	Webb Ranch	Officially Eligible, 2010	Direct effect to 31.8 acres along west edge, Adverse Effect. *See additional information below
5LP8911	Denver & Rio Grande Railroad Trestle—Farmington Branch	Officially Eligible, 2009	Within APE but located on far western edge. Will not be directly or indirectly

Site Number	Address/Property Name	Eligibility Determination	Effects Determination
			affected; No Historic Properties Affected
5LP9307	Craig Ranch	Officially Eligible, 2010	Direct effect to 12.6 acres of ranch along western edge; Adverse Effect. *See additional information below
5LP9587	Prehistoric archaeological site	Officially Eligible, 2010	Adverse Effect
5LP9588	Prehistoric archaeological site	Officially Eligible, 2010	Adverse Effect
5LP9590	Prehistoric archaeological site	Officially Eligible, 2010	Adverse Effect
5LP10844	15575 South US Highway 550	Vacant Parcel, Not Eligible (R5 survey)	No Historic Properties Affected, *See additional information below.
5LP10645	16073 S US Highway 550	Not Eligible (R5 Survey)	1.88 acres of impact north of US 550. 1.0 acre of impact south of US 550. No historic properties affected
5LP 10654.1	US Highway 160 segment	Entire highway eligible; Non Supporting segment (R5 Survey)	Replacement of concrete box culvert at Wilson Gulch within right of way. No Adverse Effect. *See additional information below

Webb Ranch (5LP8461): There will be a direct effect to the Webb Ranch as the new highway alignment extends along the western edge of the boundary. Although the buildings will be avoided, the highway represents a new visual element in the ranch setting and will compromise the feeling, setting and association of the property. A total of 31.8 acres along the western property boundary will be required. CDOT has determined that this alternative results in an *adverse effect*.

Craig Ranch (5LP9307): US 550 will be widened from two to four lanes along the historic ranch boundary and the alternative will require 12.6 acres along the western property boundary from County Road 220 and south along the US 550 alignment as noted in the attached graphic of RGM6. No ranch buildings will be directly affected by the acquisition but open ranch land along the western property boundary will be acquired and the widened US 550 alignment will be closer to the ranch buildings. These effects diminish the setting, feeling and association of the ranch. Based on this, CDOT has determined that Alternative RGM6 results in an *adverse effect* to the Craig Limousin Ranch.

US Highway 160 (5LP10654.1): The entire highway is eligible but the segment in the project area is not supporting. An existing concrete box culvert under the highway at Wilson Gulch will be replaced with a bridge to accommodate a wildlife crossing, but this will be within existing highway right of way. Because the segment is non-supporting, the alternative results in *no adverse effect*.

Property at 15575 South US Highway 55 (5LP10844): This property is located west of US Highway 550 and was assigned a site number. La Plata County assessor information indicates there is a residence and two sheds dating to 1949 on the parcel; however a site visit revealed that there are no buildings present. Because there are no longer any buildings on the property, it is considered not eligible. A map of the property showing the building that was once on the parcel is included along with a photo of its

present condition. The property is not eligible so the alternative results in a finding of *no historic properties affected*.

4. Revised G Modified Alternative

Alternative Description: As noted above, this alternative was identified as Preferred in the SFEIS; however, it has been re-designed as RGM6, which is the new Preferred Alternative. In the 2010 consultation for this alternative there were some properties south of County Road 220 and west of US Highway 550 that were not assessed for effects. Some of these properties were recently evaluated during the survey for Alternative R5, and those site forms are part of this submittal. Only properties that weren't addressed in previous consultation or that required updates to effects information are included in this section, including archaeological sites 5LP6670, 5LP9588, 5LP9589 and 5LP9590. This alternative connects US Highway 550 to US Highway 160 via the Grandview Interchange and includes two through lanes in each direction. Please see Exhibit 7-9 for more information about the alternative.

Effects Determinations

Site Number	Address/Property Name	Eligibility Determination	Effect Determination
5LP1131.21	Denver & Rio Grande Railroad	Eligible (R5 Survey)	All improvements are south of US 160 so there are no effects. No Historic Properties Affected.
5LP6695.1	Mason Lateral (formerly Co-op Ditch)	Entire ditch eligible; supporting segment	Ditch is located south of improvements. No historic properties affected. *See additional information below
5LP8461	Webb Ranch	Officially Eligible, 2010	Direct effect to 41.5 acres of land; Adverse Effect. *See additional information below
5LP9307	Craig Limousin Ranch	Officially Eligible, 2010	Direct effect to 3.43 acres, Adverse Effect. *See additional information below
5LP10844	15575 South US Highway 550	Vacant Parcel, Not Eligible (R5 Survey)	No Historic Properties Affected. *See additional information below.
5LP10645	16073 S US Highway 550	Not Eligible (R5 Survey)	This alternative directly affects 0.13 acres. No historic properties affected
5LP 10654.1	US Highway 160 segment	Entire highway Eligible; Non Supporting segment (R5 Survey)	Replacement of concrete box culvert at Wilson Gulch within right of way; No Adverse Effect. *See additional information below.

Mason Lateral (5LP6695.1): As noted earlier, the Mason Lateral segment (formerly the Co-op Ditch) was evaluated for effects from Revised G Modified in 2010 and was found to result in a direct effect to 488 feet of the ditch. This effect was based on a common termini that was identified for alternatives evaluated in the Section 4(f) evaluation. This common termini was applied erroneously to the effect determinations under Section 106. Without the common termini, the ditch segment is south of where the improvements for Revised G Modified would end, and there would be no effect to the ditch, resulting in a finding of *no historic properties affected* for Revised G Modified for this resource.

US Highway 160 (SLP10654.1): The entire highway is eligible but the segment in the project area is not supporting. An existing concrete box culvert under the highway at Wilson Gulch will be replaced with a bridge to accommodate a wildlife crossing, but this will be within existing highway right of way. Because the segment is non-supporting, the alternative results in *no adverse effect*.

Property at 15575 South US Highway 55 (SLP10844): This property is located west of US Highway 550. La Plata County assessor information indicates there is a residence and two sheds dating to 1949 on the parcel; however a site visit revealed that there are no buildings on the property. Because there are no longer any buildings on the property, it is considered not eligible, which results in a finding of *no historic properties affected*.

Webb Ranch (SLP8461): In the 2010 consultation for this property under Revised G Modified, CDOT determined there would be an adverse effect based on the construction of a new highway alignment through the ranch and its effects on the setting, feeling, and association of the property. The acreage of the impact was not included in that consultation letter so this submittal clarifies that approximately 41.5 acres of ROW is needed from the ranch. None of the buildings would be affected by this alternative. There is still an *adverse effect* to this property based on this updated effect information.

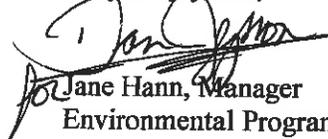
Craig Limousin Ranch (SLP9307): In the 2010 consultation for this property under Revised G Modified, CDOT determined that there would be a direct effect to 22.7 acres of the ranch on its western boundary, resulting in an adverse effect. This evaluation was based on a common termini for the alternatives evaluated in the Section 4(f) evaluation. This common termini was erroneously applied to the effects determination for the Craig Ranch for Alternative Revised G Modified in the December 2010 consultation. Without the common termini, the effect to the ranch would consist of 3.43 acres. There is still an *adverse effect* to this property based on this updated effect information.

It is the judgment of the Federal Highway Administration and CDOT that all the NRHP eligible archaeological sites listed herein or otherwise part of the previous consultation process for the US 550/160 undertaking are significant chiefly because of what can be learned by data recovery, and therefore they have minimal value for preservation in place. As a result, none of those localities qualify for preservation under Section 4(f) of the US Department of Transportation Act of 1966, as codified in 23 CFR 774.13(b)(1&2).

This information has been forwarded concurrently to the other consulting parties and SHPO for review.

As a Section 106 consulting party, we welcome your comments on these findings. Should you elect to respond, we request that you do so within 30 days of receipt of these materials. If we do not hear from you within that time frame we will assume you do not plan to comment. Please contact CDOT Senior Staff Historian Lisa Schoch at (303) 512-4258 or lisa.schoch@state.co.us, or Senior Staff Archaeologist Dan Jepson at (303) 757-9631 or daniel.jepson@state.co.us, if you have questions or require additional information.

Very truly yours,


Jane Hann, Manager
Environmental Programs Branch

Enclosures Survey Report and Site Forms for Alternative R5
Exhibits 7-8, 7-9 & 7-10
APE map, RGM6
Individual Site Forms (SLP6695.1, SLP7759, SLP7874)
Revised APE map for R5



COLORADO
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January 21, 2015

Mr. Clement Frost, Chairman
Southern Ute Indian Tribe
Attn: Mr. Alden Naranjo, Culture Preservation Officer
PO Box 737
Ignacio, CO 81137

Subject: Additional Determinations of Eligibility and Effects, Alternatives R5 and RGM6, US Highway 550 South Connection to US Highway 160, La Plata County, Colorado

Dear Mr. Frost:

Beginning in 2009, the Colorado Department of Transportation (CDOT) has consulted with you on several occasions regarding determinations of eligibility and effects to historic and archaeological resources for the project referenced above. A consulting party meeting was held in Durango in November 2011 and a Memorandum of Agreement (MOA) was executed in 2012. The Section 106 process was documented in the 2012 US 550 South Connection to US 160 Supplemental Final Environmental Impact Statement (SFEIS)/Section 4(f) Evaluation for the US Highway 160 from Durango to Bayfield EIS. In response to public comment and in an effort to be unbiased and transparent regarding the alternatives, CDOT commissioned an in-depth analysis to evaluate the best alternative to connect US 550 from south of County Road 220 north to US 160. This Independent Alternatives Analysis (IAA) was completed by a consultant team including AMEC Environment and Infrastructure, Muller Engineering Company, and other specialty consultants.

As a result of the IAA, a new preferred alternative has been identified (RGM6). This submittal includes the following updates to historic properties:

1. Updated information about the historic background of the Co-op Ditch segment 5LP9257.2.
2. Alternative R5—Eligibility and Effects. New Alternative R5 was developed and additional survey was completed by consultant HDR to address new properties west of US Highway 550. Note that additional survey for archaeological resources was not completed for this or the other newly designed alternative (RGM6), as all areas proposed for direct effects were either previously inventoried or located on steep, highly eroded slopes that preclude the presence of intact archaeological remains.
3. Alternative RGM6—Eligibility and Effects Determinations. The Preferred Alternative (Revised G Modified) identified in the 2012 SFEIS has been re-designed as Alternative RGM6. The resource base for Alternative RGM6 largely matches that of Revised G Modified, but updated effects determinations have been developed to address the differences between the two.
4. Alternative Revised G Modified—updated Eligibility and Effects Determinations. The Revised G Modified alternative was identified as the preferred alternative in the SFEIS. It has been

determined that properties west of US Highway 550 would be affected by Revised G Modified, but these effects were not discussed in the 2010 consultation for that alternative. This update also includes revisions to the effects information for the historic Webb and Craig Ranches.

1. Clarification, Mason Lateral

In the consultation for the Eastern Realignment Alternative in November 2009, CDOT identified the Co-op Ditch under site number 5LP9257, with two segments evaluated (5LP9257.1 and 5LP9257.2). The ditch was also addressed in the analysis for the Revised F Modified and Revised G Alternatives in December 2010. For all of the previous consultation efforts, there was a finding of *no adverse effect*. Additional research has found that segment 5LP9257.2 south of County Road 220 is actually the Mason Lateral, which has a slightly different history, but maintains the location of the ditch identified as the Co-op Ditch in the 2009 consultation. The site number assigned to the Mason Lateral in 2002—5LP6695.1—has been assigned to this ditch and a new set of site forms is attached.

The former Co-op Ditch (5LP9752.2) was included in the evaluation of effects for Revised G Modified in 2010. The previous consultations indicated that 488 feet of the ditch would be affected as a result of widening the highway from two to four lanes. This effect was based on a common termini developed for alternatives evaluated in the Section 4(f) evaluation. This common termini was applied erroneously to the effects determinations under Section 106. Without the common termini, the ditch segment is south of where the improvements for Revised G Modified would end, and there would be no effect to the ditch, resulting in a finding of *no historic properties affected* for Revised G Modified for this resource. See the attached graphic showing the Revised G Modified alternative for more information about its location relative to the Mason Lateral.

2. Alternative R5

Alternative Description: Alternative R5 is a design variation of Alternative R submitted to CDOT during the public comment period for the 2012 SFEIS. It was modified during the 2014 IAA to meet a higher design speed and deviates from US 550 to meet that criterion. Alternative R5 includes a modified diamond interchange with US Highway 160. See Exhibit 7-8 for more information about the location of this alternative.

Survey Report Corrections: Please note that there are some handwritten corrections in the attached survey report that reflect new information collected after the report was printed. A list of page numbers and a description of the revised content follow:

pp. 26 (Table 3), 45 (Table 4), 46 (Table 5): The report indicates that the Foster property is being treated as NRHP eligible; however, after the report was finalized a field visit revealed that there are no longer any buildings on the property to evaluate and the property is therefore *not eligible*.

p. 46 (Table 4): Denver & Rio Grande Railroad (5LP1131.21): The entire railroad is considered eligible. The documented segment is non-supporting.

pp. 6 (Table 1), 19 (Table 2), 45 (Table 4), 46 (Table 5): The Office of Archaeology and Historic Preservation (OAHP) Compass database indicates that US Highway 550/State Highway 19 (5LP6654) is field eligible. It is not officially eligible as noted in the tables. US Highway 160 (5LP10654) was just evaluated as part of the survey for the R5 Alternative and is considered eligible. It is not officially eligible as noted in the table.

Area of Potential Effects: The APE for this survey was based on design parameters of proposed Alternative R5 and to address the potential for direct and indirect effects to historic properties. The APE boundary encompasses the alternative footprint as well as adjacent parcel boundaries and topographic features. For more information about the APE for Alternative R5, please see pp. 3-4 of the enclosed report as well as the updated map, which shows the APE boundary extending south to include the entire historic property boundary of the Craig Ranch.

Eligibility Determinations: Eleven properties were evaluated for the Alternative R5 survey. Of these, three architectural properties were newly-documented and determined not eligible. An additional property—the Foster Residence at 15575 South US Highway 550—was assigned site number 5LP10844 and was initially identified as an architectural property with assessor information indicating there were several buildings on the parcel dating to 1949. However, a site visit revealed that the buildings are no longer extant and this property was determined not eligible. US Highway 160 (segment 5LP10654.1) was also newly documented; the entire highway is considered eligible but the segment lacks integrity and is non-supporting.

Four previously-recorded resources were documented on site forms as part of this survey effort. A segment of the Denver & Rio Grande Railroad (5LP1131.21) was evaluated; the entire railroad is considered eligible, but the segment lacks integrity and is non-supporting. Re-visitation forms were completed for Bridge/Railroad Ties (5LP7759) and Farm Equipment (5LP7874); the field survey indicates they are no longer extant and are not eligible. A segment of the Mason Lateral (5LP6695.1) was also documented, as discussed above.

The following table summarizes the eligibility determinations for the surveyed properties as well as previously documented archaeological sites. Additional information about these properties (minus the archaeological resources) is provided in the attached survey report.

Site Number	Address/Property Name	Construction Date	Eligibility Determination
5LP1131.21	Denver & Rio Grande Railroad segment	1881	Entire resource is eligible; Non-Supporting segment
5LP2223	Prehistoric archaeological site	N/A	Eligible
5LP6670	Prehistoric archaeological site	N/A	Eligible
5LP6695.1	Mason Lateral	1901	Entire ditch eligible; Supporting segment
5LP7759	Bridge/Railroad Ties	Unknown	No longer extant; Not Eligible
5LP7874	Farm Equipment	Circa 1930-1940	No longer extant; Not Eligible
5LP10844	15575 South US Highway 550; Foster residence	1949	Buildings no longer extant; Not Eligible
5LP10645	16073 S US Highway 550	1956	Not Eligible
5LP10646	27055 E US Highway 160	1958	Not Eligible
5LP10648	27653 E US Highway 160	1952	Not Eligible
5LP 10654.1	US Highway 160 segment	1916-1926, 1938	Entire highway eligible; Non Supporting segment

An additional ten previously-recorded properties are present within the APE, including another segment of the D&RG railroad (5LP1131.8), which is now represented by 5LP1131.21. As noted above, no additional archaeological survey was required and the two known archaeological sites were not re-visited; eligibility determinations for those properties remain unchanged and effects determinations for this alternative were made based on the new design plans.

The previously documented properties with official eligibility determinations were not re-evaluated on site forms, and are shown in the shaded area of the table below. These resources (minus the two archaeological sites) are also listed on p. 6, Table 1 of the enclosed survey report. The eligibility status of these properties was verified in the OAHP Compass database and dates of official determinations of eligibility are included. Based on the 2014 Section 106 Programmatic Agreement executed by CDOT, the State Historic Preservation Officer (SHPO), the Federal Highway Administration (FHWA), and the Advisory Council on Historic Preservation (ACHP), CDOT may rely on the previous determination for officially not eligible properties unless alterations warrant re-evaluation or the property was less than 50 years old when it was determined not eligible.

Effects determinations for newly documented and previously documented properties are summarized in the table below. There is also additional information for select properties below the table. Properties evaluated for the R5 Alternative are noted in the table and site forms for those resources are enclosed.

Effects Determinations

Site Number	Address/Property Name	Eligibility Determination	Effects Determination
5LP1131.21	Denver & Rio Grande Railroad segment	Entire resource is Eligible; Non-Supporting segment (R5 Survey)	Direct effect to 4,000 feet of the railroad due to new access road to gravel pit. No Adverse Effect; *see additional information below.
5LP2223	Prehistoric archaeological site	Officially Eligible, 2000	Adverse Effect
5LP6670	Prehistoric archaeological site	Officially Eligible, 2002	Adverse Effect
5LP5649	27561 US 160	Officially Not Eligible, 2000	No Historic Properties Affected
5LP5650	26796 US 160	Officially Not Eligible, 2000	No Historic Properties Affected
5LP5651	26796 US 160	Officially Not Eligible, 2000	No Historic Properties Affected
5LP6632—segments 5LP6632.4, 5LP6632.5, 5LP6632.6	Aztec to Durango Road	Entire road Officially Not Eligible 2002; segments Field Not Eligible	No Historic Properties Affected
5LP6654.1	US Highway 550 Segment	Entire segment Officially Not Eligible, 2011	No Historic Properties Affected
5LP6669	Trash Dump	Officially Not Eligible, 2002	No Historic Properties Affected
5LP6695.1	Mason Lateral (formerly Co-op Ditch)	Eligible, supporting segment (R5 Survey)	Within APE but outside the area of improvements; No Historic Properties Affected
5LP7759	Bridge, railroad ties	Not Eligible—no longer extant (R5 Survey)	No Historic Properties Affected
5LP7873	Corral	Officially Not Eligible, 2005	No Historic Properties Affected
5LP7874	Farm Equipment	Field Not Eligible—no longer extant (R5 Survey)	No Historic Properties Affected
5LP8461	Webb Ranch	Officially Eligible, 2010	Direct effect to 5.2 acres of ranch along western edge, Adverse Effect
5LP8911	Denver & Rio Grande Railroad Trestle—Farmington Branch	Officially Eligible, 2009	Trestle is within the broader APE but will not be affected. No Historic Properties Affected.
5LP9307	Craig Ranch and Hollywood Dairy, Craig Limousin Ranch	Officially Eligible, 2010	Direct effect to 6.9 acres of ranch along western edge, Adverse Effect
5LP10645	16073 S US Highway 550	Not Eligible (R5 Survey)	ROW includes 1 acre north of US 550, 5.9 acres south of US 550, and removal of all buildings on property. No Historic Properties Affected
5LP10646	27055 E US Highway 160	Not Eligible (R5 Survey)	Change to access. No Historic Properties Affected
5LP10648	27653 E US Highway 160	Not Eligible (R5 Survey)	Effects to 1.9 acres of the property for gravel pit access. This total includes

Site Number	Address/Property Name	Eligibility Determination	Effects Determination
			both easements and ROW. No Historic Properties Affected.
5LP 10654.1	US Highway 160 segment	Entire highway Eligible; Non Supporting segment (R5 Survey)	Widening to 20 feet for auxiliary lanes for new ramps. Replacement of Concrete Box Culvert. No Adverse Effect; *see additional information below.
5LP10844	15575 South US Highway 550	Vacant Parcel, Not Eligible (R5 Survey)	No Historic Properties Affected; *see additional information below.

Denver & Rio Grande Railroad (5LP1131.21): The overall railroad is eligible but segment 5LP1131.21 lacks integrity. The railroad is located north of US Highway 160. Currently, parts of the former railroad segment are being used as an access to an existing gravel pit operation. Access to the gravel pit would be affected by construction of the interchange under the R5 Alternative. The new proposed access road to the gravel pit would directly affect 4,000 ft. of the railroad segment. Because the segment lacks integrity, there is a finding of *no adverse effect*.

Webb Ranch (5LP8461): There would be a direct effect to the Webb Ranch as the new highway alignment extends along the western edge of the boundary. Although the buildings would be avoided, the highway represents a new visual element in the ranch setting and will compromise the feeling, setting, and association of the property. A total of 5.2 acres along the western property boundary would be required. CDOT has determined that this alternative results in an *adverse effect*.

Craig Ranch (5LP9307): US 550 would be widened from two to four lanes along the historic ranch boundary and the alternative would require 6.9 acres along the western property boundary from County Road 220 and south along the US 550 alignment as noted in the attached graphic of R5 (Exhibit 7-8). No ranch buildings would be directly affected by the acquisition but open ranch land along the western property boundary would be acquired. These effects diminish the setting, feeling, and association of the ranch. Based on this, CDOT has determined that Alternative R5 results in an *adverse effect* to the Craig Limousin Ranch.

US Highway 160 (5LP10654.1): The entire highway is eligible but the segment in the project area is not supporting. The highway would be widened a total of 20 feet for acceleration/deceleration lanes. An existing concrete box culvert under the highway at Wilson Gulch would be replaced with a bridge to accommodate a wildlife crossing, but this will be within existing highway right of way. Because the segment is non-supporting, the alternative results in *no adverse effect*.

Property at 15575 South US Highway 550 (5LP10844): This property is located west of US Highway 550 and was initially identified as a residential property. La Plata County assessor information indicates there is a residence and two sheds dating to 1949 on the parcel; however a site visit revealed that no buildings are present. Because there are no longer any buildings on the property, it is considered not eligible. An aerial photo showing the building that was once on the parcel is included herewith, along with a photo of the current property. The alternative results in *no historic properties affected*.

3. Alternative RGM6 (Preferred Alternative)

Alternative Description: This alternative is a refinement of Revised G Modified, which was identified as the Preferred Alternative in the SFEIS; Revised G Modified was enhanced during the 2014 Independent Alternatives Analysis and renamed Revised G Modified 6 (RGM6). It connects US 550 to US 160 via the existing Grandview Interchange, and includes two through lanes in each direction through the Grandview Section of US 160. Further refinement shifted the alternative to the west to avoid more of the irrigated

farmland of the Webb Ranch (5LP8461) and thereby reduce impacts to that historic property. For more information refer to Exhibit 7-10. A graphic showing the Revised G Modified alternative (Exhibit 7-9) is included for comparative purposes.

Area of Potential Effects: The APE for this alternative includes the project footprint plus the parcels directly affected by the alternative, as noted on the attached APE map.

Eligibility Determinations: Properties affected by this alternative were identified during the 2009-2011 consultations for Revised G Modified, and include the officially eligible historic Webb Ranch (5LP8461) and Craig Ranch (5LP9307), as well as properties south of County Road 220 and west of US 550 that were recently identified as part of the Alternative R5 survey noted above. Because the status of the previously documented properties (Webb Ranch, Craig Ranch, the US 550 segment, and five archaeological sites) has not changed, new site forms were not completed. Some properties that were identified in the Alternative R5 survey will also be affected by RGM6; these are noted in the following table, which includes properties within the APE for Alternative RGM6:

Site Number	Address/Property Name	Construction Date	Eligibility Determination
5LP2223	Prehistoric archaeological site	N/A	Eligible
5LP6654.1	US Highway 550	1924-1934	Officially Not Eligible, 2011
5LP6670	Prehistoric archaeological site	N/A	Eligible
5LP6695.1	Mason Lateral (formerly Co-op Ditch)	1901	Eligible, supporting segment (R5 Survey)
5LP8461	Webb Ranch		Officially Eligible, 2010
5LP8911	Denver & Rio Grande Railroad Trestle-Farmington Branch		Officially Eligible, 2009
5LP9307	Craig Ranch		Officially Eligible, 2010
5LP9587	Prehistoric archaeological site	N/A	Eligible
5LP9588	Prehistoric archaeological site	N/A	Eligible
5LP9590	Prehistoric archaeological site	N/A	Eligible
5LP10844	15575 South US Highway 550	1949	No buildings on property, Not Eligible
5LP10645	16073 S US Highway 550	1956	Not Eligible (R5 Survey)
5LP 10654.1	US Highway 160 segment	1916-1926, 1938	Entire highway Eligible; Non-Supporting segment (R5 Survey)

Effects Determinations

Site Number	Address/Property Name	Eligibility Determination	Effects Determination
5LP2223	Prehistoric archaeological site	Officially Eligible, 2000	Adverse Effect
5LP6654.1	US Highway 550	Officially Not Eligible, 2011	No Historic Properties Affected
5LP6670	Prehistoric archaeological site	Officially Eligible, 2002	Adverse Effect
5LP6695.1	Mason Lateral (formerly Co-op Ditch)	Eligible, supporting segment (R5 Survey)	Ditch will not be affected. No Historic Properties Affected.
5LP8461	Webb Ranch	Officially Eligible, 2010	Direct effect to 31.8 acres along west edge, Adverse Effect. *See additional information below
5LP8911	Denver & Rio Grande Railroad Trestle—Farmington Branch	Officially Eligible, 2009	Within APE but located on far western edge. Will not be directly or indirectly affected; No Historic Properties Affected

Site Number	Address/Property Name	Eligibility Determination	Effects Determination
5LP9307	Craig Ranch	Officially Eligible, 2010	Direct effect to 12.6 acres of ranch along western edge; Adverse Effect. *See additional information below
5LP9587	Prehistoric archaeological site	Officially Eligible, 2010	Adverse Effect
5LP9588	Prehistoric archaeological site	Officially Eligible, 2010	Adverse Effect
5LP9590	Prehistoric archaeological site	Officially Eligible, 2010	Adverse Effect
5LP10844	15575 South US Highway 550	Vacant Parcel, Not Eligible (R5 survey)	No Historic Properties Affected, *See additional information below.
5LP10645	16073 S US Highway 550	Not Eligible (R5 Survey)	1.88 acres of impact north of US 550. 1.0 acre of impact south of US 550. No historic properties affected
5LP 10654.1	US Highway 160 segment	Entire highway eligible; Non Supporting segment (R5 Survey)	Replacement of concrete box culvert at Wilson Gulch within right of way. No Adverse Effect. *See additional information below

Webb Ranch (5LP8461): There will be a direct effect to the Webb Ranch as the new highway alignment extends along the western edge of the boundary. Although the buildings will be avoided, the highway represents a new visual element in the ranch setting and will compromise the feeling, setting and association of the property. A total of 31.8 acres along the western property boundary will be required. CDOT has determined that this alternative results in an *adverse effect*.

Craig Ranch (5LP9307): US 550 will be widened from two to four lanes along the historic ranch boundary and the alternative will require 12.6 acres along the western property boundary from County Road 220 and south along the US 550 alignment as noted in the attached graphic of RGM6. No ranch buildings will be directly affected by the acquisition but open ranch land along the western property boundary will be acquired and the widened US 550 alignment will be closer to the ranch buildings. These effects diminish the setting, feeling and association of the ranch. Based on this, CDOT has determined that Alternative RGM6 results in an *adverse effect* to the Craig Limousin Ranch.

US Highway 160 (5LP10654.1): The entire highway is eligible but the segment in the project area is not supporting. An existing concrete box culvert under the highway at Wilson Gulch will be replaced with a bridge to accommodate a wildlife crossing, but this will be within existing highway right of way. Because the segment is non-supporting, the alternative results in *no adverse effect*.

Property at 15575 South US Highway 55 (5LP10844): This property is located west of US Highway 550 and was assigned a site number. La Plata County assessor information indicates there is a residence and two sheds dating to 1949 on the parcel; however a site visit revealed that there are no buildings present. Because there are no longer any buildings on the property, it is considered not eligible. A map of the property showing the building that was once on the parcel is included along with a photo of its present condition. The property is not eligible so the alternative results in a finding of *no historic properties affected*.

4. Revised G Modified Alternative

Alternative Description: As noted above, this alternative was identified as Preferred in the SFEIS; however, it has been re-designed as RGM6, which is the new Preferred Alternative. In the 2010 consultation for this alternative there were some properties south of County Road 220 and west of US Highway 550 that were not assessed for effects. Some of these properties were recently evaluated during the survey for Alternative R5, and those site forms are part of this submittal. Only properties that weren't addressed in previous consultation or that required updates to effects information are included in this section, including archaeological sites 5LP6670, 5LP9588, 5LP9589 and 5LP9590. This alternative connects US Highway 550 to US Highway 160 via the Grandview Interchange and includes two through lanes in each direction. Please see Exhibit 7-9 for more information about the alternative.

Effects Determinations

Site Number	Address/Property Name	Eligibility Determination	Effect Determination
5LP1131.21	Denver & Rio Grande Railroad	Eligible (R5 Survey)	All improvements are south of US 160 so there are no effects. No Historic Properties Affected.
5LP6695.1	Mason Lateral (formerly Co-op Ditch)	Entire ditch eligible; supporting segment	Ditch is located south of improvements. No historic properties affected. *See additional information below
5LP8461	Webb Ranch	Officially Eligible, 2010	Direct effect to 41.5 acres of land; Adverse Effect. *See additional information below
5LP9307	Craig Limousin Ranch	Officially Eligible, 2010	Direct effect to 3.43 acres, Adverse Effect. *See additional information below
5LP10844	15575 South US Highway 550	Vacant Parcel, Not Eligible (R5 Survey)	No Historic Properties Affected. *See additional information below.
5LP10645	16073 S US Highway 550	Not Eligible (R5 Survey)	This alternative directly affects 0.13 acres. No historic properties affected
5LP 10654.1	US Highway 160 segment	Entire highway Eligible; Non Supporting segment (R5 Survey)	Replacement of concrete box culvert at Wilson Gulch within right of way; No Adverse Effect. *See additional information below.

Mason Lateral (5LP6695.1): As noted earlier, the Mason Lateral segment (formerly the Co-op Ditch) was evaluated for effects from Revised G Modified in 2010 and was found to result in a direct effect to 488 feet of the ditch. This effect was based on a common termini that was identified for alternatives evaluated in the Section 4(f) evaluation. This common termini was applied erroneously to the effect determinations under Section 106. Without the common termini, the ditch segment is south of where the improvements for Revised G Modified would end, and there would be no effect to the ditch, resulting in a finding of *no historic properties affected* for Revised G Modified for this resource.

US Highway 160 (5LP10654.1): The entire highway is eligible but the segment in the project area is not supporting. An existing concrete box culvert under the highway at Wilson Gulch will be replaced with a

bridge to accommodate a wildlife crossing, but this will be within existing highway right of way. Because the segment is non-supporting, the alternative results in *no adverse effect*.

Property at 15575 South US Highway 55 (5LP10844): This property is located west of US Highway 550. La Plata County assessor information indicates there is a residence and two sheds dating to 1949 on the parcel; however a site visit revealed that there are no buildings on the property. Because there are no longer any buildings on the property, it is considered not eligible, which results in a finding of *no historic properties affected*.

Webb Ranch (5LP8461): In the 2010 consultation for this property under Revised G Modified, CDOT determined there would be an adverse effect based on the construction of a new highway alignment through the ranch and its effects on the setting, feeling, and association of the property. The acreage of the impact was not included in that consultation letter so this submittal clarifies that approximately 41.5 acres of ROW is needed from the ranch. None of the buildings would be affected by this alternative. There is still an *adverse effect* to this property based on this updated effect information.

Craig Limousin Ranch (5LP9307): In the 2010 consultation for this property under Revised G Modified, CDOT determined that there would be a direct effect to 22.7 acres of the ranch on its western boundary, resulting in an adverse effect. This evaluation was based on a common termini for the alternatives evaluated in the Section 4(f) evaluation. This common termini was erroneously applied to the effects determination for the Craig Ranch for Alternative Revised G Modified in the December 2010 consultation. Without the common termini, the effect to the ranch would consist of 3.43 acres. There is still an *adverse effect* to this property based on this updated effect information.

It is the judgment of the Federal Highway Administration (FHWA) and CDOT that all the NRHP eligible archaeological sites listed herein or otherwise part of the previous consultation process for the US 550/160 undertaking are significant chiefly because of what can be learned by data recovery, and therefore they have minimal value for preservation in place. As a result, none of those localities qualify for preservation under Section 4(f) of the US Department of Transportation Act of 1966, as codified in 23 CFR 774.13(b)(1&2).

This information has been forwarded concurrently to the other consulting parties and the State Historic Preservation Officer for review.

As a consulting tribal nation under the Section 106 regulations, we welcome your comments on these findings. Should you elect to respond, we request you do so within 30 days of receipt of these materials. If we do not hear from you within that time frame we will assume you do not plan to comment. Please contact CDOT Senior Staff Archaeologist Dan Jepson at (303) 757-9631 or daniel.jepson@state.co.us, or FHWA Environmental Program Manager Stephanie Gibson at (720) 963-3013 or stephanie.gibson@dot.gov if you have questions or require additional information.

Very truly yours,


for Jane Hann, Manager
Environmental Programs Branch

Enclosures Survey Report and Site Forms for Alternative R5
Exhibits 7-8, 7-9 & 7-10
APE map, RGM6
Individual Site Forms (5LP6695.1, 5LP7759, 5LP7874)
Revised APE map for R5



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January 21, 2015

Governor Richard B. Luarkie
Pueblo of Laguna
Attn: Robert Mooney, Sr., NAGPRA Representative
PO Box 194
Laguna, NM 87026

Subject: Additional Determinations of Eligibility and Effects, Alternatives R5 and RGM6, US Highway 550 South Connection to US Highway 160, La Plata County, Colorado

Dear Mr. Frost:

Beginning in 2009, the Colorado Department of Transportation (CDOT) has consulted with you on several occasions regarding determinations of eligibility and effects to historic and archaeological resources for the project referenced above. A consulting party meeting was held in Durango in November 2011 and a Memorandum of Agreement (MOA) was executed in 2012. The Section 106 process was documented in the 2012 US 550 South Connection to US 160 Supplemental Final Environmental Impact Statement (SFEIS)/Section 4(f) Evaluation for the US Highway 160 from Durango to Bayfield EIS. In response to public comment and in an effort to be unbiased and transparent regarding the alternatives, CDOT commissioned an in-depth analysis to evaluate the best alternative to connect US 550 from south of County Road 220 north to US 160. This Independent Alternatives Analysis (IAA) was completed by a consultant team including AMEC Environment and Infrastructure, Muller Engineering Company, and other specialty consultants.

As a result of the IAA, a new preferred alternative has been identified (RGM6). This submittal includes the following updates to historic properties:

1. Updated information about the historic background of the Co-op Ditch segment 5LP9257.2.
2. Alternative R5—Eligibility and Effects. New Alternative R5 was developed and additional survey was completed by consultant HDR to address new properties west of US Highway 550. Note that additional survey for archaeological resources was not completed for this or the other newly designed alternative (RGM6), as all areas proposed for direct effects were either previously inventoried or located on steep, highly eroded slopes that preclude the presence of intact archaeological remains.
3. Alternative RGM6—Eligibility and Effects Determinations. The Preferred Alternative (Revised G Modified) identified in the 2012 SFEIS has been re-designed as Alternative RGM6. The resource base for Alternative RGM6 largely matches that of Revised G Modified, but updated effects determinations have been developed to address the differences between the two.
4. Alternative Revised G Modified—updated Eligibility and Effects Determinations. The Revised G Modified alternative was identified as the preferred alternative in the SFEIS. It has been

determined that properties west of US Highway 550 would be affected by Revised G Modified, but these effects were not discussed in the 2010 consultation for that alternative. This update also includes revisions to the effects information for the historic Webb and Craig Ranches.

1. Clarification, Mason Lateral

In the consultation for the Eastern Realignment Alternative in November 2009, CDOT identified the Co-op Ditch under site number 5LP9257, with two segments evaluated (5LP9257.1 and 5LP9257.2). The ditch was also addressed in the analysis for the Revised F Modified and Revised G Alternatives in December 2010. For all of the previous consultation efforts, there was a finding of *no adverse effect*. Additional research has found that segment 5LP9257.2 south of County Road 220 is actually the Mason Lateral, which has a slightly different history, but maintains the location of the ditch identified as the Co-op Ditch in the 2009 consultation. The site number assigned to the Mason Lateral in 2002—5LP6695.1—has been assigned to this ditch and a new set of site forms is attached.

The former Co-op Ditch (5LP9752.2) was included in the evaluation of effects for Revised G Modified in 2010. The previous consultations indicated that 488 feet of the ditch would be affected as a result of widening the highway from two to four lanes. This effect was based on a common termini developed for alternatives evaluated in the Section 4(f) evaluation. This common termini was applied erroneously to the effects determinations under Section 106. Without the common termini, the ditch segment is south of where the improvements for Revised G Modified would end, and there would be no effect to the ditch, resulting in a finding of *no historic properties affected* for Revised G Modified for this resource. See the attached graphic showing the Revised G Modified alternative for more information about its location relative to the Mason Lateral.

2. Alternative R5

Alternative Description: Alternative R5 is a design variation of Alternative R submitted to CDOT during the public comment period for the 2012 SFEIS. It was modified during the 2014 IAA to meet a higher design speed and deviates from US 550 to meet that criterion. Alternative R5 includes a modified diamond interchange with US Highway 160. See Exhibit 7-8 for more information about the location of this alternative.

Survey Report Corrections: Please note that there are some handwritten corrections in the attached survey report that reflect new information collected after the report was printed. A list of page numbers and a description of the revised content follow:

pp. 26 (Table 3), 45 (Table 4), 46 (Table 5): The report indicates that the Foster property is being treated as NRHP eligible; however, after the report was finalized a field visit revealed that there are no longer any buildings on the property to evaluate and the property is therefore *not eligible*.

p. 46 (Table 4): Denver & Rio Grande Railroad (5LP1131.21): The entire railroad is considered eligible. The documented segment is non-supporting.

pp. 6 (Table 1), 19 (Table 2), 45 (Table 4), 46 (Table 5): The Office of Archaeology and Historic Preservation (OAHP) Compass database indicates that US Highway 550/State Highway 19 (5LP6654) is field eligible. It is not officially eligible as noted in the tables. US Highway 160 (5LP10654) was just evaluated as part of the survey for the R5 Alternative and is considered eligible. It is not officially eligible as noted in the table.

Area of Potential Effects: The APE for this survey was based on design parameters of proposed Alternative R5 and to address the potential for direct and indirect effects to historic properties. The APE boundary encompasses the alternative footprint as well as adjacent parcel boundaries and topographic features. For more information about the APE for Alternative R5, please see pp. 3-4 of the enclosed report as well as the updated map, which shows the APE boundary extending south to include the entire historic property boundary of the Craig Ranch.

Eligibility Determinations: Eleven properties were evaluated for the Alternative R5 survey. Of these, three architectural properties were newly-documented and determined not eligible. An additional property—the Foster Residence at 15575 South US Highway 550—was assigned site number 5LP10844 and was initially identified as an architectural property with assessor information indicating there were several buildings on the parcel dating to 1949. However, a site visit revealed that the buildings are no longer extant and this property was determined not eligible. US Highway 160 (segment 5LP10654.1) was also newly documented; the entire highway is considered eligible but the segment lacks integrity and is non-supporting.

Four previously-recorded resources were documented on site forms as part of this survey effort. A segment of the Denver & Rio Grande Railroad (5LP1131.21) was evaluated; the entire railroad is considered eligible, but the segment lacks integrity and is non-supporting. Re-visitation forms were completed for Bridge/Railroad Ties (5LP7759) and Farm Equipment (5LP7874); the field survey indicates they are no longer extant and are not eligible. A segment of the Mason Lateral (5LP6695.1) was also documented, as discussed above.

The following table summarizes the eligibility determinations for the surveyed properties as well as previously documented archaeological sites. Additional information about these properties (minus the archaeological resources) is provided in the attached survey report.

Site Number	Address/Property Name	Construction Date	Eligibility Determination
5LP1131.21	Denver & Rio Grande Railroad segment	1881	Entire resource is eligible; Non-Supporting segment
5LP2223	Prehistoric archaeological site	N/A	Eligible
5LP6670	Prehistoric archaeological site	N/A	Eligible
5LP6695.1	Mason Lateral	1901	Entire ditch eligible; Supporting segment
5LP7759	Bridge/Railroad Ties	Unknown	No longer extant; Not Eligible
5LP7874	Farm Equipment	Circa 1930-1940	No longer extant; Not Eligible
5LP10844	15575 South US Highway 550; Foster residence	1949	Buildings no longer extant; Not Eligible
5LP10645	16073 S US Highway 550	1956	Not Eligible
5LP10646	27055 E US Highway 160	1958	Not Eligible
5LP10648	27653 E US Highway 160	1952	Not Eligible
5LP 10654.1	US Highway 160 segment	1916-1926, 1938	Entire highway eligible; Non Supporting segment

An additional ten previously-recorded properties are present within the APE, including another segment of the D&RG railroad (5LP1131.8), which is now represented by 5LP1131.21. As noted above, no additional archaeological survey was required and the two known archaeological sites were not re-visited; eligibility determinations for those properties remain unchanged and effects determinations for this alternative were made based on the new design plans.

The previously documented properties with official eligibility determinations were not re-evaluated on site forms, and are shown in the shaded area of the table below. These resources (minus the two archaeological sites) are also listed on p. 6, Table 1 of the enclosed survey report. The eligibility status of these properties was verified in the OAHF Compass database and dates of official determinations of eligibility are included. Based on the 2014 Section 106 Programmatic Agreement executed by CDOT, the State Historic Preservation Officer (SHPO), the Federal Highway Administration (FHWA), and the Advisory Council on Historic Preservation (ACHP), CDOT may rely on the previous determination for officially not eligible properties unless alterations warrant re-evaluation or the property was less than 50 years old when it was determined not eligible.

Effects determinations for newly documented and previously documented properties are summarized in the table below. There is also additional information for select properties below the table. Properties evaluated for the R5 Alternative are noted in the table and site forms for those resources are enclosed.

Effects Determinations

Site Number	Address/Property Name	Eligibility Determination	Effects Determination
5LP1131.21	Denver & Rio Grande Railroad segment	Entire resource is Eligible; Non-Supporting segment (R5 Survey)	Direct effect to 4,000 feet of the railroad due to new access road to gravel pit. No Adverse Effect; *see additional information below.
5LP2223	Prehistoric archaeological site	Officially Eligible, 2000	Adverse Effect
5LP6670	Prehistoric archaeological site	Officially Eligible, 2002	Adverse Effect
5LP5649	27561 US 160	Officially Not Eligible, 2000	No Historic Properties Affected
5LP5650	26796 US 160	Officially Not Eligible, 2000	No Historic Properties Affected
5LP5651	26796 US 160	Officially Not Eligible, 2000	No Historic Properties Affected
5LP6632—segments 5LP6632.4, 5LP6632.5, 5LP6632.6	Aztec to Durango Road	Entire road Officially Not Eligible 2002; segments Field Not Eligible	No Historic Properties Affected
5LP6654.1	US Highway 550 Segment	Entire segment Officially Not Eligible, 2011	No Historic Properties Affected
5LP6669	Trash Dump	Officially Not Eligible, 2002	No Historic Properties Affected
5LP6695.1	Mason Lateral (formerly Co-op Ditch)	Eligible, supporting segment (R5 Survey)	Within APE but outside the area of improvements; No Historic Properties Affected
5LP7759	Bridge, railroad ties	Not Eligible—no longer extant (R5 Survey)	No Historic Properties Affected
5LP7873	Corral	Officially Not Eligible, 2005	No Historic Properties Affected
5LP7874	Farm Equipment	Field Not Eligible—no longer extant (R5 Survey)	No Historic Properties Affected
5LP8461	Webb Ranch	Officially Eligible, 2010	Direct effect to 5.2 acres of ranch along western edge, Adverse Effect
5LP8911	Denver & Rio Grande Railroad Trestle—Farmington Branch	Officially Eligible, 2009	Trestle is within the broader APE but will not be affected. No Historic Properties Affected.
5LP9307	Craig Ranch and Hollywood Dairy, Craig Limousin Ranch	Officially Eligible, 2010	Direct effect to 6.9 acres of ranch along western edge, Adverse Effect
5LP10645	16073 S US Highway 550	Not Eligible (R5 Survey)	ROW includes 1 acre north of US 550, 5.9 acres south of US 550, and removal of all buildings on property. No Historic Properties Affected
5LP10646	27055 E US Highway 160	Not Eligible (R5 Survey)	Change to access. No Historic Properties Affected
5LP10648	27653 E US Highway 160	Not Eligible (R5 Survey)	Effects to 1.9 acres of the property for gravel pit access. This total includes

Site Number	Address/Property Name	Eligibility Determination	Effects Determination
			both easements and ROW. No Historic Properties Affected.
5LP 10654.1	US Highway 160 segment	Entire highway Eligible; Non Supporting segment (R5 Survey)	Widening to 20 feet for auxiliary lanes for new ramps. Replacement of Concrete Box Culvert. No Adverse Effect; *see additional information below.
5LP10844	15575 South US Highway 550	Vacant Parcel, Not Eligible (R5 Survey)	No Historic Properties Affected; *see additional information below.

Denver & Rio Grande Railroad (5LP1131.21): The overall railroad is eligible but segment 5LP1131.21 lacks integrity. The railroad is located north of US Highway 160. Currently, parts of the former railroad segment are being used as an access to an existing gravel pit operation. Access to the gravel pit would be affected by construction of the interchange under the R5 Alternative. The new proposed access road to the gravel pit would directly affect 4,000 ft. of the railroad segment. Because the segment lacks integrity, there is a finding of *no adverse effect*.

Webb Ranch (5LP8461): There would be a direct effect to the Webb Ranch as the new highway alignment extends along the western edge of the boundary. Although the buildings would be avoided, the highway represents a new visual element in the ranch setting and will compromise the feeling, setting, and association of the property. A total of 5.2 acres along the western property boundary would be required. CDOT has determined that this alternative results in an *adverse effect*.

Craig Ranch (5LP9307): US 550 would be widened from two to four lanes along the historic ranch boundary and the alternative would require 6.9 acres along the western property boundary from County Road 220 and south along the US 550 alignment as noted in the attached graphic of R5 (Exhibit 7-8). No ranch buildings would be directly affected by the acquisition but open ranch land along the western property boundary would be acquired. These effects diminish the setting, feeling, and association of the ranch. Based on this, CDOT has determined that Alternative R5 results in an *adverse effect* to the Craig Limousin Ranch.

US Highway 160 (5LP10654.1): The entire highway is eligible but the segment in the project area is not supporting. The highway would be widened a total of 20 feet for acceleration/deceleration lanes. An existing concrete box culvert under the highway at Wilson Gulch would be replaced with a bridge to accommodate a wildlife crossing, but this will be within existing highway right of way. Because the segment is non-supporting, the alternative results in *no adverse effect*.

Property at 15575 South US Highway 550 (5LP10844): This property is located west of US Highway 550 and was initially identified as a residential property. La Plata County assessor information indicates there is a residence and two sheds dating to 1949 on the parcel; however a site visit revealed that no buildings are present. Because there are no longer any buildings on the property, it is considered not eligible. An aerial photo showing the building that was once on the parcel is included herewith, along with a photo of the current property. The alternative results in *no historic properties affected*.

3. Alternative RGM6 (Preferred Alternative)

Alternative Description: This alternative is a refinement of Revised G Modified, which was identified as the Preferred Alternative in the SFEIS; Revised G Modified was enhanced during the 2014 Independent Alternatives Analysis and renamed Revised G Modified 6 (RGM6). It connects US 550 to US 160 via the existing Grandview Interchange, and includes two through lanes in each direction through the Grandview Section of US 160. Further refinement shifted the alternative to the west to avoid more of the irrigated

farmland of the Webb Ranch (5LP8461) and thereby reduce impacts to that historic property. For more information refer to Exhibit 7-10. A graphic showing the Revised G Modified alternative (Exhibit 7-9) is included for comparative purposes.

Area of Potential Effects: The APE for this alternative includes the project footprint plus the parcels directly affected by the alternative, as noted on the attached APE map.

Eligibility Determinations: Properties affected by this alternative were identified during the 2009-2011 consultations for Revised G Modified, and include the officially eligible historic Webb Ranch (5LP8461) and Craig Ranch (5LP9307), as well as properties south of County Road 220 and west of US 550 that were recently identified as part of the Alternative R5 survey noted above. Because the status of the previously documented properties (Webb Ranch, Craig Ranch, the US 550 segment, and five archaeological sites) has not changed, new site forms were not completed. Some properties that were identified in the Alternative R5 survey will also be affected by RGM6; these are noted in the following table, which includes properties within the APE for Alternative RGM6:

Site Number	Address/Property Name	Construction Date	Eligibility Determination
5LP2223	Prehistoric archaeological site	N/A	Eligible
5LP6654.1	US Highway 550	1924-1934	Officially Not Eligible, 2011
5LP6670	Prehistoric archaeological site	N/A	Eligible
5LP6695.1	Mason Lateral (formerly Co-op Ditch)	1901	Eligible, supporting segment (R5 Survey)
5LP8461	Webb Ranch		Officially Eligible, 2010
5LP8911	Denver & Rio Grande Railroad Trestle-Farmington Branch		Officially Eligible, 2009
5LP9307	Craig Ranch		Officially Eligible, 2010
5LP9587	Prehistoric archaeological site	N/A	Eligible
5LP9588	Prehistoric archaeological site	N/A	Eligible
5LP9590	Prehistoric archaeological site	N/A	Eligible
5LP10844	15575 South US Highway 550	1949	No buildings on property, Not Eligible
5LP10645	16073 S US Highway 550	1956	Not Eligible (R5 Survey)
5LP 10654.1	US Highway 160 segment	1916-1926, 1938	Entire highway Eligible; Non-Supporting segment (R5 Survey)

Effects Determinations

Site Number	Address/Property Name	Eligibility Determination	Effects Determination
5LP2223	Prehistoric archaeological site	Officially Eligible, 2000	Adverse Effect
5LP6654.1	US Highway 550	Officially Not Eligible, 2011	No Historic Properties Affected
5LP6670	Prehistoric archaeological site	Officially Eligible, 2002	Adverse Effect
5LP6695.1	Mason Lateral (formerly Co-op Ditch)	Eligible, supporting segment (R5 Survey)	Ditch will not be affected. No Historic Properties Affected.
5LP8461	Webb Ranch	Officially Eligible, 2010	Direct effect to 31.8 acres along west edge, Adverse Effect. *See additional information below
5LP8911	Denver & Rio Grande Railroad Trestle—Farmington Branch	Officially Eligible, 2009	Within APE but located on far western edge. Will not be directly or indirectly affected; No Historic Properties Affected

Site Number	Address/Property Name	Eligibility Determination	Effects Determination
5LP9307	Craig Ranch	Officially Eligible, 2010	Direct effect to 12.6 acres of ranch along western edge; Adverse Effect. *See additional information below
5LP9587	Prehistoric archaeological site	Officially Eligible, 2010	Adverse Effect
5LP9588	Prehistoric archaeological site	Officially Eligible, 2010	Adverse Effect
5LP9590	Prehistoric archaeological site	Officially Eligible, 2010	Adverse Effect
5LP10844	15575 South US Highway 550	Vacant Parcel, Not Eligible (R5 survey)	No Historic Properties Affected, *See additional information below.
5LP10645	16073 S US Highway 550	Not Eligible (R5 Survey)	1.88 acres of impact north of US 550. 1.0 acre of impact south of US 550. No historic properties affected
5LP 10654.1	US Highway 160 segment	Entire highway eligible; Non Supporting segment (R5 Survey)	Replacement of concrete box culvert at Wilson Gulch within right of way. No Adverse Effect. *See additional information below

Webb Ranch (5LP8461): There will be a direct effect to the Webb Ranch as the new highway alignment extends along the western edge of the boundary. Although the buildings will be avoided, the highway represents a new visual element in the ranch setting and will compromise the feeling, setting and association of the property. A total of 31.8 acres along the western property boundary will be required. CDOT has determined that this alternative results in an *adverse effect*.

Craig Ranch (5LP9307): US 550 will be widened from two to four lanes along the historic ranch boundary and the alternative will require 12.6 acres along the western property boundary from County Road 220 and south along the US 550 alignment as noted in the attached graphic of RGM6. No ranch buildings will be directly affected by the acquisition but open ranch land along the western property boundary will be acquired and the widened US 550 alignment will be closer to the ranch buildings. These effects diminish the setting, feeling and association of the ranch. Based on this, CDOT has determined that Alternative RGM6 results in an *adverse effect* to the Craig Limousin Ranch.

US Highway 160 (5LP10654.1): The entire highway is eligible but the segment in the project area is not supporting. An existing concrete box culvert under the highway at Wilson Gulch will be replaced with a bridge to accommodate a wildlife crossing, but this will be within existing highway right of way. Because the segment is non-supporting, the alternative results in *no adverse effect*.

Property at 15575 South US Highway 55 (5LP10844): This property is located west of US Highway 550 and was assigned a site number. La Plata County assessor information indicates there is a residence and two sheds dating to 1949 on the parcel; however a site visit revealed that there are no buildings present. Because there are no longer any buildings on the property, it is considered not eligible. A map of the property showing the building that was once on the parcel is included along with a photo of its present condition. The property is not eligible so the alternative results in a finding of *no historic properties affected*.

4. Revised G Modified Alternative

Alternative Description: As noted above, this alternative was identified as Preferred in the SFEIS; however, it has been re-designed as RGM6, which is the new Preferred Alternative. In the 2010 consultation for this alternative there were some properties south of County Road 220 and west of US Highway 550 that were not assessed for effects. Some of these properties were recently evaluated during the survey for Alternative R5, and those site forms are part of this submittal. Only properties that weren't addressed in previous consultation or that required updates to effects information are included in this section, including archaeological sites 5LP6670, 5LP9588, 5LP9589 and 5LP9590. This alternative connects US Highway 550 to US Highway 160 via the Grandview Interchange and includes two through lanes in each direction. Please see Exhibit 7-9 for more information about the alternative.

Effects Determinations

Site Number	Address/Property Name	Eligibility Determination	Effect Determination
5LP1131.21	Denver & Rio Grande Railroad	Eligible (R5 Survey)	All improvements are south of US 160 so there are no effects. No Historic Properties Affected.
5LP6695.1	Mason Lateral (formerly Co-op Ditch)	Entire ditch eligible; supporting segment	Ditch is located south of improvements. No historic properties affected. *See additional information below
5LP8461	Webb Ranch	Officially Eligible, 2010	Direct effect to 41.5 acres of land; Adverse Effect. *See additional information below
5LP9307	Craig Limousin Ranch	Officially Eligible, 2010	Direct effect to 3.43 acres, Adverse Effect. *See additional information below
5LP10844	15575 South US Highway 550	Vacant Parcel, Not Eligible (R5 Survey)	No Historic Properties Affected. *See additional information below.
5LP10645	16073 S US Highway 550	Not Eligible (R5 Survey)	This alternative directly affects 0.13 acres. No historic properties affected
5LP 10654.1	US Highway 160 segment	Entire highway Eligible; Non Supporting segment (R5 Survey)	Replacement of concrete box culvert at Wilson Gulch within right of way; No Adverse Effect. *See additional information below.

Mason Lateral (5LP6695.1): As noted earlier, the Mason Lateral segment (formerly the Co-op Ditch) was evaluated for effects from Revised G Modified in 2010 and was found to result in a direct effect to 488 feet of the ditch. This effect was based on a common termini that was identified for alternatives evaluated in the Section 4(f) evaluation. This common termini was applied erroneously to the effect determinations under Section 106. Without the common termini, the ditch segment is south of where the improvements for Revised G Modified would end, and there would be no effect to the ditch, resulting in a finding of *no historic properties affected* for Revised G Modified for this resource.

US Highway 160 (5LP10654.1): The entire highway is eligible but the segment in the project area is not supporting. An existing concrete box culvert under the highway at Wilson Gulch will be replaced with a

bridge to accommodate a wildlife crossing, but this will be within existing highway right of way. Because the segment is non-supporting, the alternative results in *no adverse effect*.

Property at 15575 South US Highway 55 (5LP10844): This property is located west of US Highway 550. La Plata County assessor information indicates there is a residence and two sheds dating to 1949 on the parcel; however a site visit revealed that there are no buildings on the property. Because there are no longer any buildings on the property, it is considered not eligible, which results in a finding of *no historic properties affected*.

Webb Ranch (5LP8461): In the 2010 consultation for this property under Revised G Modified, CDOT determined there would be an adverse effect based on the construction of a new highway alignment through the ranch and its effects on the setting, feeling, and association of the property. The acreage of the impact was not included in that consultation letter so this submittal clarifies that approximately 41.5 acres of ROW is needed from the ranch. None of the buildings would be affected by this alternative. There is still an *adverse effect* to this property based on this updated effect information.

Craig Limousin Ranch (5LP9307): In the 2010 consultation for this property under Revised G Modified, CDOT determined that there would be a direct effect to 22.7 acres of the ranch on its western boundary, resulting in an adverse effect. This evaluation was based on a common termini for the alternatives evaluated in the Section 4(f) evaluation. This common termini was erroneously applied to the effects determination for the Craig Ranch for Alternative Revised G Modified in the December 2010 consultation. Without the common termini, the effect to the ranch would consist of 3.43 acres. There is still an *adverse effect* to this property based on this updated effect information.

It is the judgment of the Federal Highway Administration (FHWA) and CDOT that all the NRHP eligible archaeological sites listed herein or otherwise part of the previous consultation process for the US 550/160 undertaking are significant chiefly because of what can be learned by data recovery, and therefore they have minimal value for preservation in place. As a result, none of those localities qualify for preservation under Section 4(f) of the US Department of Transportation Act of 1966, as codified in 23 CFR 774.13(b)(1&2).

This information has been forwarded concurrently to the other consulting parties and the State Historic Preservation Officer for review.

As a consulting tribal nation under the Section 106 regulations, we welcome your comments on these findings. Should you elect to respond, we request you do so within 30 days of receipt of these materials. If we do not hear from you within that time frame we will assume you do not plan to comment. Please contact CDOT Senior Staff Archaeologist Dan Jepson at (303) 757-9631 or daniel.jepson@state.co.us, or FHWA Environmental Program Manager Stephanie Gibson at (720) 963-3013 or stephanie.gibson@dot.gov if you have questions or require additional information.

Very truly yours,



Jane Hann, Manager
Environmental Programs Branch

Enclosures Survey Report and Site Forms for Alternative R5
Exhibits 7-8, 7-9 & 7-10
APE map, RGM6
Individual Site Forms (5LP6695.1, 5LP7759, 5LP7874)
Revised APE map for R5



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January 21, 2015

Chairman Herman G. Honanie
The Hopi Tribe
Attn: Leigh J. Kuwanwisiwma, Cultural Preservation Office
PO Box 123
Kykotsmovi, AZ 86039

Subject: Additional Determinations of Eligibility and Effects, Alternatives R5 and RGM6, US Highway 550 South Connection to US Highway 160, La Plata County

Dear Chairman Honanie:

Beginning in 2009, the Colorado Department of Transportation (CDOT) has consulted with you on several occasions regarding determinations of eligibility and effects to historic and archaeological resources for the project referenced above. A consulting party meeting was held in Durango in November 2011 and a Memorandum of Agreement (MOA) was executed in 2012. The Section 106 process was documented in the 2012 US 550 South Connection to US 160 Supplemental Final Environmental Impact Statement (SFEIS)/Section 4(f) Evaluation for the US Highway 160 from Durango to Bayfield EIS. In response to public comment and in an effort to be unbiased and transparent regarding the alternatives, CDOT commissioned an in-depth analysis to evaluate the best alternative to connect US 550 from south of County Road 220 north to US 160. This Independent Alternatives Analysis (IAA) was completed by a consultant team including AMEC Environment and Infrastructure, Muller Engineering Company, and other specialty consultants.

As a result of the IAA, a new preferred alternative has been identified (RGM6). This submittal includes the following updates to historic properties:

1. Updated information about the historic background of the Co-op Ditch segment 5LP9257.2.
2. Alternative R5—Eligibility and Effects. New Alternative R5 was developed and additional survey was completed by consultant HDR to address new properties west of US Highway 550. Note that additional survey for archaeological resources was not completed for this or the other newly designed alternative (RGM6), as all areas proposed for direct effects were either previously inventoried or located on steep, highly eroded slopes that preclude the presence of intact archaeological remains.
3. Alternative RGM6—Eligibility and Effects Determinations. The Preferred Alternative (Revised G Modified) identified in the 2012 SFEIS has been re-designed as Alternative RGM6. The resource base for Alternative RGM6 largely matches that of Revised G Modified, but updated effects determinations have been developed to address the differences between the two.
4. Alternative Revised G Modified—updated Eligibility and Effects Determinations. The Revised G Modified alternative was identified as the preferred alternative in the SFEIS. It has been determined that properties west of US Highway 550 would be affected by Revised G Modified, but these effects were not discussed in the 2010 consultation for that alternative. This update also includes revisions to the effects information for the historic Webb and Craig Ranches.

1. Clarification, Mason Lateral

In the consultation for the Eastern Realignment Alternative in November 2009, CDOT identified the Co-op Ditch under site number 5LP9257, with two segments evaluated (5LP9257.1 and 5LP9257.2). The ditch was also addressed in the analysis for the Revised F Modified and Revised G Alternatives in December 2010. For all of the previous consultation efforts, there was a finding of *no adverse effect*. Additional research has found that segment 5LP9257.2 south of County Road 220 is actually the Mason Lateral, which has a slightly different history, but maintains the location of the ditch identified as the Co-op Ditch in the 2009 consultation. The site number assigned to the Mason Lateral in 2002—5LP6695.1—has been assigned to this ditch and a new set of site forms is attached.

The former Co-op Ditch (5LP9752.2) was included in the evaluation of effects for Revised G Modified in 2010. The previous consultations indicated that 488 feet of the ditch would be affected as a result of widening the highway from two to four lanes. This effect was based on a common termini developed for alternatives evaluated in the Section 4(f) evaluation. This common termini was applied erroneously to the effects determinations under Section 106. Without the common termini, the ditch segment is south of where the improvements for Revised G Modified would end, and there would be no effect to the ditch, resulting in a finding of *no historic properties affected* for Revised G Modified for this resource. See the attached graphic showing the Revised G Modified alternative for more information about its location relative to the Mason Lateral.

2. Alternative R5

Alternative Description: Alternative R5 is a design variation of Alternative R submitted to CDOT during the public comment period for the 2012 SFEIS. It was modified during the 2014 IAA to meet a higher design speed and deviates from US 550 to meet that criterion. Alternative R5 includes a modified diamond interchange with US Highway 160. See Exhibit 7-8 for more information about the location of this alternative.

Survey Report Corrections: Please note that there are some handwritten corrections in the attached survey report that reflect new information collected after the report was printed. A list of page numbers and a description of the revised content follow:

pp. 26 (Table 3), 45 (Table 4), 46 (Table 5): The report indicates that the Foster property is being treated as NRHP eligible; however, after the report was finalized a field visit revealed that there are no longer any buildings on the property to evaluate and the property is therefore *not eligible*.

p. 46 (Table 4): Denver & Rio Grande Railroad (5LP1131.21): The entire railroad is considered eligible. The documented segment is non-supporting.

pp. 6 (Table 1), 19 (Table 2), 45 (Table 4), 46 (Table 5): The Office of Archaeology and Historic Preservation (OAHP) Compass database indicates that US Highway 550/State Highway 19 (5LP6654) is field eligible. It is not officially eligible as noted in the tables. US Highway 160 (5LP10654) was just evaluated as part of the survey for the R5 Alternative and is considered eligible. It is not officially eligible as noted in the table.

Area of Potential Effects: The APE for this survey was based on design parameters of proposed Alternative R5 and to address the potential for direct and indirect effects to historic properties. The APE boundary encompasses the alternative footprint as well as adjacent parcel boundaries and topographic features. For more information about the APE for Alternative R5, please see pp. 3-4 of the enclosed report as well as the updated map, which shows the APE boundary extending south to include the entire historic property boundary of the Craig Ranch.

Eligibility Determinations: Eleven properties were evaluated for the Alternative R5 survey. Of these, three architectural properties were newly-documented and determined not eligible. An additional property—the Foster Residence at 15575 South US Highway 550—was assigned site number 5LP10844

and was initially identified as an architectural property with assessor information indicating there were several buildings on the parcel dating to 1949. However, a site visit revealed that the buildings are no longer extant and this property was determined not eligible. US Highway 160 (segment 5LP10654.1) was also newly documented; the entire highway is considered eligible but the segment lacks integrity and is non-supporting.

Four previously-recorded resources were documented on site forms as part of this survey effort. A segment of the Denver & Rio Grande Railroad (5LP1131.21) was evaluated; the entire railroad is considered eligible, but the segment lacks integrity and is non-supporting. Re-visitation forms were completed for Bridge/Railroad Ties (5LP7759) and Farm Equipment (5LP7874); the field survey indicates they are no longer extant and are not eligible. A segment of the Mason Lateral (5LP6695.1) was also documented, as discussed above.

The following table summarizes the eligibility determinations for the surveyed properties as well as previously documented archaeological sites. Additional information about these properties (minus the archaeological resources) is provided in the attached survey report.

Site Number	Address/Property Name	Construction Date	Eligibility Determination
5LP1131.21	Denver & Rio Grande Railroad segment	1881	Entire resource is eligible; Non-Supporting segment
5LP2223	Prehistoric archaeological site	N/A	Eligible
5LP6670	Prehistoric archaeological site	N/A	Eligible
5LP6695.1	Mason Lateral	1901	Entire ditch eligible; Supporting segment
5LP7759	Bridge/Railroad Ties	Unknown	No longer extant; Not Eligible
5LP7874	Farm Equipment	Circa 1930-1940	No longer extant; Not Eligible
5LP10844	15575 South US Highway 550; Foster residence	1949	Buildings no longer extant; Not Eligible
5LP10645	16073 S US Highway 550	1956	Not Eligible
5LP10646	27055 E US Highway 160	1958	Not Eligible
5LP10648	27653 E US Highway 160	1952	Not Eligible
5LP 10654.1	US Highway 160 segment	1916-1926, 1938	Entire highway eligible; Non Supporting segment

An additional ten previously-recorded properties are present within the APE, including another segment of the D&RG railroad (5LP1131.8), which is now represented by 5LP1131.21. As noted above, no additional archaeological survey was required and the two known archaeological sites were not re-visited; eligibility determinations for those properties remain unchanged and effects determinations for this alternative were made based on the new design plans.

The previously documented properties with official eligibility determinations were not re-evaluated on site forms, and are shown in the shaded area of the table below. These resources (minus the two archaeological sites) are also listed on p. 6, Table 1 of the enclosed survey report. The eligibility status of these properties was verified in the OAHF Compass database and dates of official determinations of eligibility are included. Based on the 2014 Section 106 Programmatic Agreement executed by CDOT, the State Historic Preservation Officer (SHPO), the Federal Highway Administration (FHWA), and the Advisory Council on Historic Preservation (ACHP), CDOT may rely on the previous determination for officially not eligible properties unless alterations warrant re-evaluation or the property was less than 50 years old when it was determined not eligible.

Effects determinations for newly documented and previously documented properties are summarized in the table below. There is also additional information for select properties below the table. Properties evaluated for the R5 Alternative are noted in the table and site forms for those resources are enclosed.

Effects Determinations

Site Number	Address/Property Name	Eligibility Determination	Effects Determination
5LP1131.21	Denver & Rio Grande Railroad segment	Entire resource is Eligible; Non-Supporting segment (R5 Survey)	Direct effect to 4,000 feet of the railroad due to new access road to gravel pit. No Adverse Effect; *see additional information below.
5LP2223	Prehistoric archaeological site	Officially Eligible, 2000	Adverse Effect
5LP6670	Prehistoric archaeological site	Officially Eligible, 2002	Adverse Effect
5LP5649	27561 US 160	Officially Not Eligible, 2000	No Historic Properties Affected
5LP5650	26796 US 160	Officially Not Eligible, 2000	No Historic Properties Affected
5LP5651	26796 US 160	Officially Not Eligible, 2000	No Historic Properties Affected
5LP6632—segments 5LP6632.4, 5LP6632.5, 5LP6632.6	Aztec to Durango Road	Entire road Officially Not Eligible 2002; segments Field Not Eligible	No Historic Properties Affected
5LP6654.1	US Highway 550 Segment	Entire segment Officially Not Eligible, 2011	No Historic Properties Affected
5LP6669	Trash Dump	Officially Not Eligible, 2002	No Historic Properties Affected
5LP6695.1	Mason Lateral (formerly Co-op Ditch)	Eligible, supporting segment (R5 Survey)	Within APE but outside the area of improvements; No Historic Properties Affected
5LP7759	Bridge, railroad ties	Not Eligible—no longer extant (R5 Survey)	No Historic Properties Affected
5LP7873	Corral	Officially Not Eligible, 2005	No Historic Properties Affected
5LP7874	Farm Equipment	Field Not Eligible—no longer extant (R5 Survey)	No Historic Properties Affected
5LP8461	Webb Ranch	Officially Eligible, 2010	Direct effect to 5.2 acres of ranch along western edge, Adverse Effect
5LP8911	Denver & Rio Grande Railroad Trestle—Farmington Branch	Officially Eligible, 2009	Trestle is within the broader APE but will not be affected. No Historic Properties Affected.
5LP9307	Craig Ranch and Hollywood Dairy, Craig Limousin Ranch	Officially Eligible, 2010	Direct effect to 6.9 acres of ranch along western edge, Adverse Effect
5LP10645	16073 S US Highway 550	Not Eligible (R5 Survey)	ROW includes 1 acre north of US 550, 5.9 acres south of US 550, and removal of all buildings on property. No Historic Properties Affected
5LP10646	27055 E US Highway 160	Not Eligible (R5 Survey)	Change to access. No Historic Properties Affected
5LP10648	27653 E US Highway 160	Not Eligible (R5 Survey)	Effects to 1.9 acres of the property for gravel pit access. This total includes both easements and ROW. No Historic Properties Affected.

Site Number	Address/Property Name	Eligibility Determination	Effects Determination
5LP 10654.1	US Highway 160 segment	Entire highway Eligible; Non Supporting segment (R5 Survey)	Widening to 20 feet for auxiliary lanes for new ramps. Replacement of Concrete Box Culvert. No Adverse Effect; *see additional information below.
5LP10844	15575 South US Highway 550	Vacant Parcel, Not Eligible (R5 Survey)	No Historic Properties Affected; *see additional information below.

Denver & Rio Grande Railroad (5LP1131.21): The overall railroad is eligible but segment 5LP1131.21 lacks integrity. The railroad is located north of US Highway 160. Currently, parts of the former railroad segment are being used as an access to an existing gravel pit operation. Access to the gravel pit would be affected by construction of the interchange under the R5 Alternative. The new proposed access road to the gravel pit would directly affect 4,000 ft. of the railroad segment. Because the segment lacks integrity, there is a finding of *no adverse effect*.

Webb Ranch (5LP8461): There would be a direct effect to the Webb Ranch as the new highway alignment extends along the western edge of the boundary. Although the buildings would be avoided, the highway represents a new visual element in the ranch setting and will compromise the feeling, setting, and association of the property. A total of 5.2 acres along the western property boundary would be required. CDOT has determined that this alternative results in an *adverse effect*.

Craig Ranch (5LP9307): US 550 would be widened from two to four lanes along the historic ranch boundary and the alternative would require 6.9 acres along the western property boundary from County Road 220 and south along the US 550 alignment as noted in the attached graphic of R5 (Exhibit 7-8). No ranch buildings would be directly affected by the acquisition but open ranch land along the western property boundary would be acquired. These effects diminish the setting, feeling, and association of the ranch. Based on this, CDOT has determined that Alternative R5 results in an *adverse effect* to the Craig Limousin Ranch.

US Highway 160 (5LP10654.1): The entire highway is eligible but the segment in the project area is not supporting. The highway would be widened a total of 20 feet for acceleration/deceleration lanes. An existing concrete box culvert under the highway at Wilson Gulch would be replaced with a bridge to accommodate a wildlife crossing, but this will be within existing highway right of way. Because the segment is non-supporting, the alternative results in *no adverse effect*.

Property at 15575 South US Highway 550 (5LP10844): This property is located west of US Highway 550 and was initially identified as a residential property. La Plata County assessor information indicates there is a residence and two sheds dating to 1949 on the parcel; however a site visit revealed that no buildings are present. Because there are no longer any buildings on the property, it is considered not eligible. An aerial photo showing the building that was once on the parcel is included herewith, along with a photo of the current property. The alternative results in *no historic properties affected*.

3. Alternative RGM6 (Preferred Alternative)

Alternative Description: This alternative is a refinement of Revised G Modified, which was identified as the Preferred Alternative in the SFEIS; Revised G Modified was enhanced during the 2014 Independent Alternatives Analysis and renamed Revised G Modified 6 (RGM6). It connects US 550 to US 160 via the existing Grandview Interchange, and includes two through lanes in each direction through the Grandview Section of US 160. Further refinement shifted the alternative to the west to avoid more of the irrigated farmland of the Webb Ranch (5LP8461) and thereby reduce impacts to that historic property. For more

information refer to Exhibit 7-10. A graphic showing the Revised G Modified alternative (Exhibit 7-9) is included for comparative purposes.

Area of Potential Effects: The APE for this alternative includes the project footprint plus the parcels directly affected by the alternative, as noted on the attached APE map.

Eligibility Determinations: Properties affected by this alternative were identified during the 2009-2011 consultations for Revised G Modified, and include the officially eligible historic Webb Ranch (5LP8461) and Craig Ranch (5LP9307), as well as properties south of County Road 220 and west of US 550 that were recently identified as part of the Alternative R5 survey noted above. Because the status of the previously documented properties (Webb Ranch, Craig Ranch, the US 550 segment, and five archaeological sites) has not changed, new site forms were not completed. Some properties that were identified in the Alternative R5 survey will also be affected by RGM6; these are noted in the following table, which includes properties within the APE for Alternative RGM6:

Site Number	Address/Property Name	Construction Date	Eligibility Determination
5LP2223	Prehistoric archaeological site	N/A	Eligible
5LP6654.1	US Highway 550	1924-1934	Officially Not Eligible, 2011
5LP6670	Prehistoric archaeological site	N/A	Eligible
5LP6695.1	Mason Lateral (formerly Co-op Ditch)	1901	Eligible, supporting segment (R5 Survey)
5LP8461	Webb Ranch		Officially Eligible, 2010
5LP8911	Denver & Rio Grande Railroad Trestle-Farmington Branch		Officially Eligible, 2009
5LP9307	Craig Ranch		Officially Eligible, 2010
5LP9587	Prehistoric archaeological site	N/A	Eligible
5LP9588	Prehistoric archaeological site	N/A	Eligible
5LP9590	Prehistoric archaeological site	N/A	Eligible
5LP10844	15575 South US Highway 550	1949	No buildings on property, Not Eligible
5LP10645	16073 S US Highway 550	1956	Not Eligible (R5 Survey)
5LP 10654.1	US Highway 160 segment	1916-1926, 1938	Entire highway Eligible; Non-Supporting segment (R5 Survey)

Effects Determinations

Site Number	Address/Property Name	Eligibility Determination	Effects Determination
5LP2223	Prehistoric archaeological site	Officially Eligible, 2000	Adverse Effect
5LP6654.1	US Highway 550	Officially Not Eligible, 2011	No Historic Properties Affected
5LP6670	Prehistoric archaeological site	Officially Eligible, 2002	Adverse Effect
5LP6695.1	Mason Lateral (formerly Co-op Ditch)	Eligible, supporting segment (R5 Survey)	Ditch will not be affected. No Historic Properties Affected.
5LP8461	Webb Ranch	Officially Eligible, 2010	Direct effect to 31.8 acres along west edge, Adverse Effect. *See additional information below
5LP8911	Denver & Rio Grande Railroad Trestle—Farmington Branch	Officially Eligible, 2009	Within APE but located on far western edge. Will not be directly or indirectly affected; No Historic Properties Affected

Site Number	Address/Property Name	Eligibility Determination	Effects Determination
5LP9307	Craig Ranch	Officially Eligible, 2010	Direct effect to 12.6 acres of ranch along western edge; Adverse Effect. *See additional information below
5LP9587	Prehistoric archaeological site	Officially Eligible, 2010	Adverse Effect
5LP9588	Prehistoric archaeological site	Officially Eligible, 2010	Adverse Effect
5LP9590	Prehistoric archaeological site	Officially Eligible, 2010	Adverse Effect
5LP10844	15575 South US Highway 550	Vacant Parcel, Not Eligible (R5 survey)	No Historic Properties Affected, *See additional information below.
5LP10645	16073 S US Highway 550	Not Eligible (R5 Survey)	1.88 acres of impact north of US 550. 1.0 acre of impact south of US 550. No historic properties affected
5LP 10654.1	US Highway 160 segment	Entire highway eligible; Non Supporting segment (R5 Survey)	Replacement of concrete box culvert at Wilson Gulch within right of way. No Adverse Effect. *See additional information below

Webb Ranch (5LP8461): There will be a direct effect to the Webb Ranch as the new highway alignment extends along the western edge of the boundary. Although the buildings will be avoided, the highway represents a new visual element in the ranch setting and will compromise the feeling, setting and association of the property. A total of 31.8 acres along the western property boundary will be required. CDOT has determined that this alternative results in an *adverse effect*.

Craig Ranch (5LP9307): US 550 will be widened from two to four lanes along the historic ranch boundary and the alternative will require 12.6 acres along the western property boundary from County Road 220 and south along the US 550 alignment as noted in the attached graphic of RGM6. No ranch buildings will be directly affected by the acquisition but open ranch land along the western property boundary will be acquired and the widened US 550 alignment will be closer to the ranch buildings. These effects diminish the setting, feeling and association of the ranch. Based on this, CDOT has determined that Alternative RGM6 results in an *adverse effect* to the Craig Limousin Ranch.

US Highway 160 (5LP10654.1): The entire highway is eligible but the segment in the project area is not supporting. An existing concrete box culvert under the highway at Wilson Gulch will be replaced with a bridge to accommodate a wildlife crossing, but this will be within existing highway right of way. Because the segment is non-supporting, the alternative results in *no adverse effect*.

Property at 15575 South US Highway 55 (5LP10844): This property is located west of US Highway 550 and was assigned a site number. La Plata County assessor information indicates there is a residence and two sheds dating to 1949 on the parcel; however a site visit revealed that there are no buildings present. Because there are no longer any buildings on the property, it is considered not eligible. A map of the property showing the building that was once on the parcel is included along with a photo of its present condition. The property is not eligible so the alternative results in a finding of *no historic properties affected*.

4. Revised G Modified Alternative

Alternative Description: As noted above, this alternative was identified as Preferred in the SFEIS; however, it has been re-designed as RGM6, which is the new Preferred Alternative. In the 2010 consultation for this alternative there were some properties south of County Road 220 and west of US Highway 550 that were not assessed for effects. Some of these properties were recently evaluated during the survey for Alternative R5, and those site forms are part of this submittal. Only properties that weren't addressed in previous consultation or that required updates to effects information are included in this section, including archaeological sites 5LP6670, 5LP9588, 5LP9589 and 5LP9590. This alternative connects US Highway 550 to US Highway 160 via the Grandview Interchange and includes two through lanes in each direction. Please see Exhibit 7-9 for more information about the alternative.

Effects Determinations

Site Number	Address/Property Name	Eligibility Determination	Effect Determination
5LP1131.21	Denver & Rio Grande Railroad	Eligible (R5 Survey)	All improvements are south of US 160 so there are no effects. No Historic Properties Affected.
5LP6695.1	Mason Lateral (formerly Co-op Ditch)	Entire ditch eligible; supporting segment	Ditch is located south of improvements. No historic properties affected. *See additional information below
5LP8461	Webb Ranch	Officially Eligible, 2010	Direct effect to 41.5 acres of land; Adverse Effect. *See additional information below
5LP9307	Craig Limousin Ranch	Officially Eligible, 2010	Direct effect to 3.43 acres, Adverse Effect. *See additional information below
5LP10844	15575 South US Highway 550	Vacant Parcel, Not Eligible (R5 Survey)	No Historic Properties Affected. *See additional information below.
5LP10645	16073 S US Highway 550	Not Eligible (R5 Survey)	This alternative directly affects 0.13 acres. No historic properties affected
5LP 10654.1	US Highway 160 segment	Entire highway Eligible; Non Supporting segment (R5 Survey)	Replacement of concrete box culvert at Wilson Gulch within right of way; No Adverse Effect. *See additional information below.

Mason Lateral (5LP6695.1): As noted earlier, the Mason Lateral segment (formerly the Co-op Ditch) was evaluated for effects from Revised G Modified in 2010 and was found to result in a direct effect to 488 feet of the ditch. This effect was based on a common termini that was identified for alternatives evaluated in the Section 4(f) evaluation. This common termini was applied erroneously to the effect determinations under Section 106. Without the common termini, the ditch segment is south of where the improvements for Revised G Modified would end, and there would be no effect to the ditch, resulting in a finding of *no historic properties affected* for Revised G Modified for this resource.

US Highway 160 (5LP10654.1): The entire highway is eligible but the segment in the project area is not supporting. An existing concrete box culvert under the highway at Wilson Gulch will be replaced with a

bridge to accommodate a wildlife crossing, but this will be within existing highway right of way. Because the segment is non-supporting, the alternative results in *no adverse effect*.

Property at 15575 South US Highway 55 (5LP10844): This property is located west of US Highway 550. La Plata County assessor information indicates there is a residence and two sheds dating to 1949 on the parcel; however a site visit revealed that there are no buildings on the property. Because there are no longer any buildings on the property, it is considered not eligible, which results in a finding of *no historic properties affected*.

Webb Ranch (5LP8461): In the 2010 consultation for this property under Revised G Modified, CDOT determined there would be an adverse effect based on the construction of a new highway alignment through the ranch and its effects on the setting, feeling, and association of the property. The acreage of the impact was not included in that consultation letter so this submittal clarifies that approximately 41.5 acres of ROW is needed from the ranch. None of the buildings would be affected by this alternative. There is still an *adverse effect* to this property based on this updated effect information.

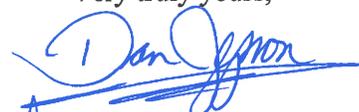
Craig Limousin Ranch (5LP9307): In the 2010 consultation for this property under Revised G Modified, CDOT determined that there would be a direct effect to 22.7 acres of the ranch on its western boundary, resulting in an adverse effect. This evaluation was based on a common termini for the alternatives evaluated in the Section 4(f) evaluation. This common termini was erroneously applied to the effects determination for the Craig Ranch for Alternative Revised G Modified in the December 2010 consultation. Without the common termini, the effect to the ranch would consist of 3.43 acres. There is still an *adverse effect* to this property based on this updated effect information.

It is the judgment of the Federal Highway Administration (FHWA) and CDOT that all the NRHP eligible archaeological sites listed herein or otherwise part of the previous consultation process for the US 550/160 undertaking are significant chiefly because of what can be learned by data recovery, and therefore they have minimal value for preservation in place. As a result, none of those localities qualify for preservation under Section 4(f) of the US Department of Transportation Act of 1966, as codified in 23 CFR 774.13(b)(1&2).

This information has been forwarded concurrently to the other consulting parties and the State Historic Preservation Officer for review.

As a consulting tribal nation under the Section 106 regulations, we welcome your comments on these findings. Should you elect to respond, we request you do so within 30 days of receipt of these materials. If we do not hear from you within that time frame we will assume you do not plan to comment. Please contact CDOT Senior Staff Archaeologist Dan Jepson at (303) 757-9631 or daniel.jepson@state.co.us, or FHWA Environmental Program Manager Stephanie Gibson at (720) 963-3013 or stephanie.gibson@dot.gov if you have questions or require additional information.

Very truly yours,



Jane Hann, Manager
Environmental Programs Branch

Enclosures Survey Report and Site Forms for Alternative R5
Exhibits 7-8, 7-9 & 7-10
APE map, RGM6
Individual Site Forms (5LP6695.1, 5LP7759, 5LP7874)
Revised APE map for R5



HISTORY Colorado

January 28, 2015

Jane Hann
Manager, Environmental Programs Branch
Colorado Department of Transportation
Environmental Programs Branch
4201 East Arkansas Avenue
Denver, CO 80222

Re: Determination of Eligibility and Effects, Alternatives R5, RGM6, and RGM: US 550 South Connection to US 160 Project, La Plata County (CHS #33425)

Dear Ms. Hann,

Thank you for your correspondence dated and received on January 16, 2015 regarding the review of the above-mentioned project under Section 106 of the National Historic Preservation Act (Section 106).

After review of the submitted information, we are not able to agree with the proposed Areas of Potential Effects (APE) for Alternative R5 (R5), Alternative RGM6 (RGM6), and Alternative Revised G Modified (RGM). In our opinion, resource 5LP.9310/Clark Property should be included in all three alternatives reference above because our office believes 5LP.9310 is within the geographical area that could be indirectly (visual and noise) affected by all three alternatives. We recommend revising the three alternatives to include resource 5LP.9310.

After review of the provided survey information in this submission, we concur with the recommended finding of national register eligibility for the resources listed below.

- 5LP.1131.21
- 5LP.10645
- 5LP.10646
- 5LP.10648
- 5LP.10654.1
- 5LP.10844

Please see below for our comments after review of the provided information from this submission.

Alternative R5

- We recommend including resource 5LP.9310 in the APE.
- We concur that resources 5LP.7759 and 5LP.7874 are officially not eligible for the National Register of Historic Places.
- We recommend a finding of *no adverse effect* [36 CFR 800.5(b)] under Section 106 for resource 5LP.6654, including segment 5LP.6654.1. The segment does not support the overall eligibility of the entire resource, which is eligible for the National Register of Historic Places. The scope of work will affect the eligible linear resource, 5LP.6654, but that effect would not be adverse.

- Staff concurs with the recommended findings of effects presented in the Effects Determinations table on pages 4 and 5 of the submitted letter report.

Alternative RGMG (Preferred Alternative)

- We recommend including resource 5LP.9310 in the APE.
- We recommend a finding of *no adverse effect* [36 CFR 800.5(b)] under Section 106 for resource 5LP.6654, including segment 5LP.6654.1. The segment does not support the overall eligibility of the entire resource, which is eligible for the National Register of Historic Places. The scope of work will affect the eligible linear resource, 5LP.6654, but that effect would not be adverse.
- Staff concurs with the recommended findings of effects presented in the Effects Determinations table on pages 6 and 7 of the submitted letter report.

Revised G Modified Alternative

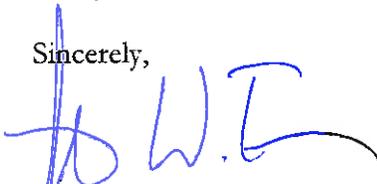
- We recommend including resource 5LP.9310 in the APE.
- Staff concurs with the recommended findings of effects presented in the Effects Determinations table on page 8 of the submitted letter report.

We concur with the recommended finding of *no historic properties affected* [36 CFR 800.4(d)(1)] under Section 106 for resource 5LP.6695, including segment 5LP.6695.1.

If unidentified archaeological resources are discovered during construction, work must be interrupted until the resources have been evaluated in terms of the National Register criteria, 36 CFR 60.4, in consultation with this office. We request being involved in the consultation process with the local government, which as stipulated in 36 CFR 800.3 is required to be notified of the undertaking, and with other consulting parties. Additional information provided by the local government or consulting parties might cause our office to re-evaluate our eligibility and potential effect findings.

Please note that our compliance letter does not end the 30-day review period provided to other consulting parties. If we may be of further assistance, please contact Amy Pallante, our Section 106 Compliance Manager, at (303) 866-4678.

Sincerely,



Edward C. Nichols
State Historic Preservation Officer



Herman G. Honanie
CHAIRMAN

Alfred Lomahquahu Jr.
VICE-CHAIRMAN

February 2, 2015

Jane Hann, Manager, Environmental Programs Branch
Attention: Dan Jepson, Senior Staff Archaeologist
Colorado Department of Transportation
4201 E. Arkansas Ave., Shumate Building
Denver, Colorado 80222-3400

Re: US Highway 550 Connection to US 160 at Farmington Hill

Dear Ms. Hann,

Thank you for your correspondence dated January 21, 2015, with enclosed additional determinations of eligibility and effects, Alternatives R5 and RGM6, regarding the US Highway 550 Connection to US 160 at Farmington Hill. The Hopi Tribe claims cultural affiliation to the Ancestral Puebloan prehistoric cultural groups in Colorado. The Hopi Cultural Preservation Office supports identification and avoidance of prehistoric archaeological sites and Traditional Cultural Properties, and we consider the archaeological sites of our ancestors to be Traditional Cultural Properties. Therefore, we appreciate the Colorado Department of Transportation's continuing solicitation of our input and your efforts to address our concerns.

In a letter dated November 23, 2009, the Hopi Cultural Preservation Office reviewed the Eastern Realignment Alternative cultural resources survey report and stated we understood that alternative will result in adverse effects to 8 National Register eligible prehistoric sites.

In a letter dated August 16, 2010, we reviewed the cultural resources survey report that identifies 6 National Register eligible prehistoric sites in the Revised F Modified Alternative, and 3 National Register eligible prehistoric sites in the Revised G Modified Alternative, and stated we understood that either of these alternatives will result in adverse effects to prehistoric structures.

In a letter dated April 11, 2011, we reviewed the draft Memorandum of Agreement and Draft Section 4(f) Evaluation, and regarding the draft Memorandum of Agreement, we deferred to the State Historic Preservation Office and other interested tribes.

Jane Hann
February 2, 2015
Page 2

In a letter dated December 12, 2011, we stated we understood that an Ancestral Puebloan residential site was now also proposed to be adversely affected due to a slight realignment of the Revised G Modified Alternative. Therefore, we concurred that this the Revised G Modified Alternative will result in adverse effects to 5 National Register prehistoric sites significant to the Hopi Tribe.

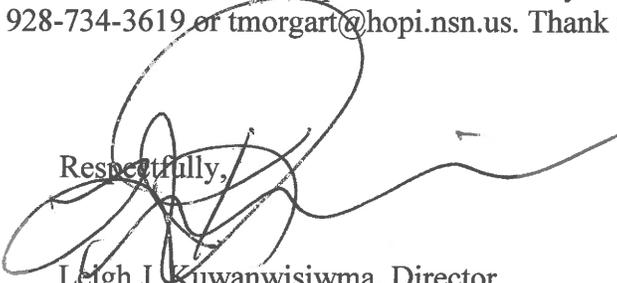
In a letter dated July 20, 2012, we reviewed the final Memorandum of Agreement and stated we understood 5 National Register eligible prehistoric sites would be adversely affected by this project. Therefore, we reiterated our request for ongoing consultation including being provided with copies of proposed treatment plans and preliminary and draft data recovery reports for review and comment.

We now understand a new alternative R5 would adversely affect two National Register eligible prehistoric sites and new preferred alternative RGM6 would adversely affect five National Register eligible prehistoric sites. We do not concur that these sites are significant chiefly because of what can be learned by data recovery and therefore they have minimal value for preservation in place.

Therefore, we have determined that new preferred alternative RGM6 will result in adverse effects to National Register prehistoric sites significant to the Hopi Tribe and reiterate our request for ongoing consultation including being provided with copies of proposed treatment plans and preliminary and draft data recovery reports for review and comment.

If you have any questions or need additional information, please contact Terry Morgart at the Hopi Cultural Preservation Office at 928-734-3619 or tmorgart@hopi.nsn.us. Thank you for your consideration.

Respectfully,



Leigh J. Kuwanwisiwma, Director
Hopi Cultural Preservation Office

xc: Colorado State Historic Preservation Office



COLORADO
Department of Transportation
Division of Transportation Development

Environmental Programs Branch
4201 E. Arkansas Ave.
Shumate Building
Denver, CO 80222-3400
(303) 757-9281

February 17, 2015

Mr. Edward C. Nichols
State Historic Preservation Officer
History Colorado Center
1200 Broadway
Denver, CO 80203

Subject: Additional Information, US 550 South Connection to US 160, La Plata County

Dear Mr. Nichols:

Thank you for your response dated January 28, 2015 and received in this office on February 3, 2015 regarding the project referenced above. We recently consulted with you in correspondence dated January 16, 2015. This letter is a response to your recommendations regarding two resources.

Clark Property (5LP9310)

For Alternatives R5, RGM6 (Preferred) and Revised G Modified, you recommended revising the respective Area of Potential Effect (APE) boundaries to include the Clark Property (5LP9310). CDOT agrees with your recommendation; revised APE maps for each of the alternatives are attached. All of the alternatives involve a turn lane and tie-in from the realigned US Highway 550 east to County Road 220. The connection for Alternatives R5 and RGM6 are similar in that the tie-in from US 550 to CR 220 is completed well west of the Clark Property. While there will be no direct effects to the property for these two alternatives, there could be some changes to the visual setting with the additional pavement along CR 220. However, these minor changes will not alter the qualities of significance of the property and these alternatives would result in *no adverse effect* to the Clark Property.

For Alternative RGM, there is also a turn lane and tie-in from US 550 to CR 220, but the improvement extends east to the western edge of the Clark Property. As with the other alternatives, there will be no direct effects to the property but the tie-in will involve some changes to the visual setting as there will be some additional pavement on CR 220 near the Clark Property. The change to the setting is minor and will not alter the qualities that make the property significant, and Alternative RGM will result in *no adverse effect* to 5LP9310. Copies of the graphics showing the location of Alternatives R5, RGM6, and RGM are re-submitted herewith for your convenience.

US Highway 550 (5LP6654.1)

For Alternatives R5, RGM6, and RGM, you recommended a finding of *no adverse effect* for US Highway 550 (5LP6654.1) stating that the segment does not support the overall linear resource. In 2011, CDOT consulted with your office regarding this highway segment and recommended that the segment itself had a history distinct from the whole of US Highway 550, and therefore that the *segment* was not eligible. You concurred with this finding in correspondence dated August 24, 2011. Copies of the 2011 correspondence regarding the eligibility of 5LP6654.1 is also attached. CDOT supports its initial determination that the project results in *no historic properties affected* with regard to the highway segment.

This information has been copied to the consulting parties for the project. The revised APE maps were forwarded to those parties for their files.

We request your concurrence with these effects determinations. Please contact CDOT Senior Historian Lisa Schoch at (303) 512-4258 or lisa.schoch@state.co.us if you have questions or require additional information.

Very truly yours,



Jane Hann, Manager
Environmental Programs Branch

Enclosures Revised APE maps (R5, RGM6, RGM)

cc: Tony Cady, CDOT Region 1
 Gina McAfee, HDR
 Edward Pappas, Dickinson Wright
 Shannon Bennett
 Philip Craig
 Joel Craig
 Antonia Clark
 Peggy Cooley
 Herman G. Honanie, The Hopi Tribe
 Governor Richard B. Luarkie, Pueblo of Laguna
 Clement Frost, Southern Ute Indian Tribe



HISTORY Colorado

February 23, 2015

Jane Hann
Manager, Environmental Programs Branch
Colorado Department of Transportation
Environmental Programs Branch
4201 East Arkansas Avenue
Denver, CO 80222

Re: Additional Information, US 550 South Connections to US 160 Project, La Plata County
(CHS #33425)

Dear Ms. Hann,

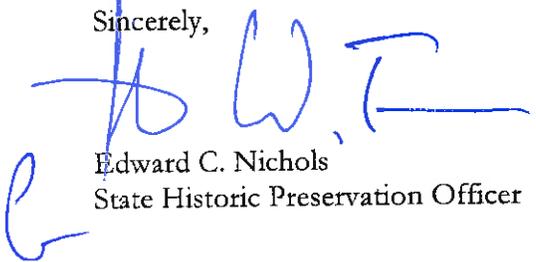
Thank you for your additional information correspondence dated and received by email on February 17, 2015 regarding the review of the above-mentioned project under Section 106 of the National Historic Preservation Act (Section 106).

After review of the submitted information, we do not object with the recommended Area of Potential Effects (APE) for the project alternatives. After review of the provided information, we concur with the recommended finding of *no adverse effect* [36 CFR 800.5(b)] under Section 106 for resource 5LP.9310. After review of the additional survey information, we concur that 5LP.6654.1 is distinctive from the overall highway resource and is not eligible for the National Register of Historic Places. We concur with the recommended finding of *no historic properties affected* [36 CFR 800.4(d)(1)] under Section 106 for resource 5LP.6654.1.

If unidentified archaeological resources are discovered during construction, work must be interrupted until the resources have been evaluated in terms of the National Register criteria, 36 CFR 60.4, in consultation with this office. We request being involved in the consultation process with the local government, which as stipulated in 36 CFR 800.3 is required to be notified of the undertaking, and with other consulting parties. Additional information provided by the local government or consulting parties might cause our office to re-evaluate our eligibility and potential effect findings.

Please note that our compliance letter does not end the 30-day review period provided to other consulting parties. If we may be of further assistance, please contact Amy Pallante, our Section 106 Compliance Manager, at (303) 866-4678.

Sincerely,



Edward C. Nichols
State Historic Preservation Officer

