

**PIKES PEAK AREA COUNCIL OF GOVERNMENTS**

15 South 7<sup>th</sup> Street - Colorado Springs, CO 80905-1501



January 15, 2003

Mr. Douglas P. Eberhart  
Wilson & Company  
455 E. Pikes Peak Avenue, Suite 200  
Colorado Springs, CO 80903-3675

Dear Mr. Eberhart:

As the Metropolitan Planning Organization in the Pikes Peak region, PPACG encourages inter-agency coordination on transportation planning matters. Therefore, our staff was pleased to review the Interstate 25 traffic volumes that you have developed for the air quality conformity analysis in the I-25 Environmental Assessment.

We understand that you developed morning and evening peak hour volumes intended for comparing build and no-build scenarios for the year 2025, using the PPACG-calibrated TRANPLAN model and adopted PPACG socio-economic forecasts.

Since the TRANPLAN model does not simulate high-occupancy-vehicle lanes, non-model based adjustments were made using a scenario containing a total of eight general-purpose lanes. This involved assumptions for HOV lane usage by normally occurring carpools plus an accounting of induced new users. This resulted in an estimate for use of the HOV lane, and a minor reduction in volume and corresponding volume-to-capacity ratios for the remaining six general-purpose lanes. This reduction was consistent with the figures you discussed with us in January 2002.

We understand that the resulting volumes were input to the HPR volume-to-capacity speed formula to estimate travel speeds for use in air pollutant emission calculations. These model-based forecasts developed by this process are intended to be consistent with the process used by PPACG in the TIP and long-range plan conformity determinations, but may differ slightly from refined project-level volumes developed for engineering design purposes.

Based upon our review, it appears that the methodology and assumptions you applied to the PPACG traffic model to arrive at the adjusted traffic volumes are adequate for use in determining corridor emissions for air quality conformity purposes. As always, please note that our staff acceptance does not constitute or reflect an official endorsement by the PPACG Board of Directors.

Sincerely,

Robert F. MacDonald, P.E.  
Transportation Director

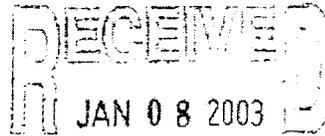
Enclosures



## CITY OF COLORADO SPRINGS

January 7, 2002

Doug Eberhart  
Senior Transportation Planner  
Wilson and Company  
455 E. Pikes Peak Avenue, Suite 200  
Colorado Springs, CO 80903



Wilson & Company  
Colorado Springs Office

Dear Doug,

Thank you for the opportunity over the past several months to review and provide comment on the proposed noise mitigation measures for Monument Valley Park. As you are aware, we took your findings through a two-step process; an internal review by Parks, Recreation and Cultural Services staff members and a public review by the Parks and Recreation Advisory Board. We are pleased that there was close consensus between both staff and our citizen advisory board on the key issues. The Parks Board, as reflected in their formal vote on December 12, 2002, wishes to reserve the option to amend their recommendations once the draft Environmental Assessment is available for review. I believe their concerns revolve primarily around any significant findings that may come out of the historic resources inventory that was conducted on Monument Valley Park.

Attached for your file are the following documents:

- ♦ Copy of the November 14, 2002 Parks Board agenda packet
- ♦ Copy of the November 14, 2002 Parks Board meeting minutes
- ♦ Copy of the December 12, 2002 Parks Board agenda packet
- ♦ Copy of the December 12, 2002 Parks Board meeting minutes

For space reasons, we have included only those portions of the agenda and minutes that pertain to this issue.

In terms of official positions of staff and the Parks Board, the minutes of the December 12<sup>th</sup> meeting contain a copy of the staff recommendation and the official Parks Board motion. I trust those two items will meet your needs for the documentation you need to prepare.

If you have any additional questions or the need for additional information, please do not hesitate to call me (385-6501).

Sincerely,

A handwritten signature in black ink that reads "Paul D. Butcher". The signature is written in a cursive, slightly slanted style.

Paul D. Butcher  
Director  
Parks, Recreation and Cultural Services

Attachments





CITY OF COLORADO SPRINGS

**AGENDA**

Parks and Recreation Advisory Board  
December 12, 2002 7:30 a.m.  
1401 Recreation Way

**CITIZEN DISCUSSION**

Time for any individual to bring before the Parks and Recreation Advisory Board any matter of interest they wish to discuss that is not on the agenda.

**APPROVAL OF MINUTES**

Minutes from November 14, 2002 meeting

**PRESENTATION**

- |   |   |
|---|---|
| 1. Service Awards                                   |   |
| - Mike (Dennis) Guerin (15 Years)                   | Tim Pluemer, Skilled Maintenance Supervisor |
| - Mike Stone (15)                                   | Tim Pluemer, Skilled Maintenance Supervisor |
| - Andrew Morris (5)                                 | Gene Smith, Visitor Services Supervisor     |
| 2. Cemetery Year-End Report                         | Will DeBoer, Manager, Cemetery              |
| 3. Golf Year-End Report                             | Dal Lockwood, Manager, Golf                 |
| 4. Beidleman Environmental Center Transition Update | Matt Mayberry, Manager, Cultural Services   |
| 5. Design and Development Construction Update       | Fred Mais, Manager, Design and Development  |

**CONTINUING BUSINESS**

- |   |   |
|---|---|
| 6. Update on County Courthouse Expansion                  | Steve Tuck, Senior Planner, City Planning                         |
| 7. Air Force Memorial                                     | Fred Mais, Manager, Design and Development                        |
| 8. Noise Wall Options Along I-25 and Monument Valley Park | Paul Butcher, Director, PR&CS                                     |
| 9. Garden of the Gods Restoration Report Update           | Kurt Schroeder, Manager, Parks Maintenance, Trails and Open Space |

**NEW BUSINESS**

- |                                   |   |
|-----------------------------------|---|
| 10. Easement Request at Pike Park | Terry Putman, Manager, Park Planning and TOPS |
|-----------------------------------|---|

\*\*\*\*\*Break: 9:30 a.m. - Holiday Reception\*\*\*\*\*

COLORADO SPRINGS PARKS AND RECREATION DEPARTMENT  
PARKS AND RECREATION ADVISORY BOARD

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**Date:** December 12, 2002  
**Item Number:** Continuing Business - Item #8  
**Item Name:** Noise Wall Options Along I-25 and Monument Valley Park

**BACKGROUND:**

The Colorado Department of Transportation (CDOT), as part of its federal review process for the proposed expansion of I-25, must conduct noise studies and analysis along properties adjacent to the interstate. In the late 1990's, a study of highway noise on Monument Valley Park concluded that the large picnic pavilion located in South Monument Valley Park (west of the swimming pool) was eligible for noise mitigation. After reviewing numerous options, it was determined that a pre-cast sound wall, located on the park's westside property boundary, was the most acceptable solution. The barrier was constructed and anecdotal comments from park users have been that the barrier has accomplished its intended purpose.

On November 14, 2002, CDOT and their consultants presented the Parks Board with noise mitigation options for various segments of Monument Valley Park. Parks Department staff and a representative from Colorado Springs Utilities provided the Board with comments on each of the proposed options.

**CURRENT STATUS:**

CDOT is requesting a formal position from the Parks Department and the Parks Board that can be incorporated into their final report on noise issues as relates to Monument Valley Park. At the November 14<sup>th</sup> meeting Ms. Chesley Miller with the Friends of Monument Valley Park indicated that her group is studying the options but have no formal recommendations at this time. They are in contact with a physics professor from the University of Colorado who is helping them with the sound issues. Colorado Springs Utilities is strongly opposed to the closing of Recreation Way, but has no position of the other issues.

**STAFF RECOMMENDATION:**

Staff has prepared (see attached) its final recommendations on the options presented by CDOT and its consultants. Staff would point out that CDOT is still finalizing its Historic Resource Survey for Monument Valley Park and that may have some impacts on the proposed noise mitigation measures. Pending the outcome of that report, staff has reserved the right with CDOT to revise its recommendations based on additional findings.

**ACTION NEEDED BY THE BOARD:**

Motion to accept, reject, or otherwise modify the recommendations of the Parks and Recreation staff as they relate to noise mitigation measures proposed for Monument Valley Park.

**PARTIES NOTIFIED OF THIS MEETING:**

Friends of Monument Valley Park  
Lee Cook, Colorado Springs Utilities  
Steve Watt, Wilson and Company

**Parks, Recreation and Cultural Services**  
**Colorado Springs Utilities**  
**Final Recommendations**  
**I-25 and Monument Valley Park**  
**- Proposed Noise Mitigation Measures -**

**NOTE:** These recommendations pertaining only to the draft Noise Mitigation Plan for the above project may not represent the entirety of the City's official position.

Recommendations: (heading South to North along the park)

**Area "A" Sound Barrier**

Proposed Design: An earth berm from 5' to 25' high.

Location: In CDOT right-of-way between I-25 and railroad.

Area of the Park Receiving Benefit: Southern part of the ballfield and the trails and gardens south of the ballfield.

Position of Park Staff: No objection to earth berm, but at this time the City has no funds for landscape maintenance.

**Area "B" Visual Barrier**

Proposed Design: Additional trees planted between existing large cottonwood trees.

Location: In the park, along the west property line, just south of the existing sound barrier.

Area of the Park Receiving Benefit: This is a visual barrier only (in-fill with lower growing trees blocking the view of highway), no sound benefit.

Position of Park Staff: No objections.

**Area "C" Sound Barrier**

Proposed Design: (Wall Options)

Option C.1: 10' high x 300' long sound barrier (east side of Glen Avenue).

Option C.2: 20' high x 470' long sound barrier (west side of Glen Avenue).

Option C.3: 20' high x 625' long sound barrier (east edge of CDOT ROW).

Location: Option C.1: Between Demonstration Garden and Glen Avenue.

Option C.2: Between Glen Avenue and the railroad ROW.

Option C.3: Between the fence line between the railroad corridor and the highway.

Area of the Park Receiving Benefit: Demonstration Garden.

Position of Park Staff: Eliminate Option C.1 as it poses park-user safety concerns.

Option C.3 is preferable, Option C.2 is a consideration.

Comments by Wilson & Co.: C.2 will take away the illegal parking that is currently occurring in the railroad right-of-way. CDOT is not sure if wall can be squeezed in but it is an option under study.

#### **Area "D" Sound Barrier**

Proposed Design: (Wall Options)

Option D.1: 20' high x 1,060' long sound barrier.

Option D.2: 20' high x 1,080' long sound barrier.

Location: Option D.1: Two segments (in "gore area" and east edge of CDOT ROW between the railroad and the highway).

Option D.2: Between Glen Avenue and the railroad.

Area of the Park Receiving Benefit: This will protect the ponds area and trail south of Uintah Street.

Position of Park Staff: Either option is acceptable but there is some concern that D.2 is closer to the park and may have a "crowding" effect to Glen Avenue and the ponds.

#### **Area "E" Sound Barrier**

Proposed Design: 21' high x 750' long sound barrier.

Location: Between Recreation Way and the railroad.

Area of the Park Receiving Benefit: This wall was proposed for the San Miguel residential neighborhood and perhaps may also benefit the park.

Position of Park Staff: Check on Colorado College's plan for acquisition. Stop noise wall (north edge) short of Parks and Recreation building.

#### **Area "F" Sound Barrier**

Proposed Design: An earth berm 15' high x approximately 1,500' long.

Location: Replaces portion of Recreation Way between Parks and Recreation Headquarters and Fleet Parking Lot.

Area of the Park Receiving Benefit: Approximately 50' of trail (west side of the creek).

Position of Park Staff: Major concern with closing of Recreation Way and loss of parking lots, maintenance yards and Forestry Operation Center. No direct access for vehicles to fuel yards without going on and off I-25.

Traffic and City Engineering/Fire would probably object to this long cul-de-sac.

Proposed that CDOT build a short pedestrian bridge to span Mesa Creek drainage and move trail out of the noise contour area. City to plant screening trees on west side of Recreation Way to provide visual barrier similar to that which exists opposite Headquarters Building.

(COMMENTS FROM LEE JOCK - C.S. UTILITIES)

### I - 25 Sound Mitigation Proposals For Monument Valley Park

- Area F Sound Barrier (Replacing Recreation Way)
  - This proposal presents unacceptable consequences for the City and CSU operations out of the Fontanero Complex north of the proposed berm
    - Operations affected:
      - Street Department
      - Fleet Department
      - Facilities
      - Machine Weld
      - Radio Communications
      - CSU Field Operations
  - Eliminates one access to and from downtown (Recreation Way)
    - In cases where I-25 is closed for weather, accidents, or backed up during rush-hour, response times to support downtown facilities would be greatly increased
      - Vehicles would have to go North to Filmore, East to, at least Cascade and then South to support downtown
      - Would put more truck traffic through the North End Neighborhood
    - Recreation Way has always been open when I-25 has been closed
    - Costs of operations would be greatly increased due to longer distances to drive resulting in higher mileage and manhour costs
    - The estimated average vehicle count in and out of the Fontanero complex each week day is approximately 2,000 vehicles per day
      - Not all use Recreation Way, but a significant number do
    - These consequences relate to vehicle operations either coming into or going out of the Fontanero complex
- The sound barrier closing Recreation Way would also affect Parks & Recreation operations by imposing greater driving distances on vehicles needing access to the north.

~~Mr. Case reiterated what he said earlier and said that his is concerned about the precedent that the Board may set on the Department's ability to get parks in the future. He said that the Department is purchasing open space and parks all the time and that is not an easy task as it is but to try to add additional component might be difficult for the staff. Mr. Case said that the letter needs to be clarified that the view ordinance should apply only to this particular site and that the Board is not suggesting that this ordinance go beyond that.~~

~~The Board voted and the motion carried unanimously.~~

~~NOTE: Due to several people waiting for the Item #8 and conflicts of meeting with staff, citizens, and Board members, Item #8 was moved as the next item.~~

### Noise Wall Options Along I-25 and Monument Valley Park (Item #8)

Paul Butcher, Director of Parks, Recreation and Cultural Services, said that this item was presented to the Board as an information item at the November Board meeting. At that time, CDOT's consultant (Wilson and Company) presented various options on noise mitigation measures within Monument Valley Park and staff provided input as well. Included in the Board packet are the minutes from the last Board meeting and the noise mitigation options that are described in detail and the final recommendation from the Parks Department and Colorado Springs Utilities (CSU).

Referring to the Sound Barrier "F", Mr. Butcher said that both the Parks Department and CSU had a considerable concern with closing down and cul-de-sacing Recreation Way and putting approximately 1,500 linear foot of berm in its place. Both departments share Recreation Way to get to their facilities and closing that road would cut off access to their facilities and to north and south roadways, which are vital to operations. The north and south roadways are two access point from Recreation Way to major thoroughfares.

In discussions with Wilson and Company an idea was proposed to protect a trail segment that crosses Mesa Springs Creek. This falls within the 66 decibel contour line. The Department's proposal is to work cooperatively with CDOT and have a pedestrian bridge that would cross that creek farther to the east to take the trail outside of the noise contour line. The Department has started a tree planting program on Recreation Way with evergreen trees that would mirror what we have out in this area and try to build a linear forest to provide a visual barrier. This does not necessarily attenuate the sound as a wall would but it would provide a visual barrier.

Mr. Butcher said approximately 90% of the recommendations or the concerns and comments that the Board has heard at the last meeting are still in valid agreement. The only major change is the agreement that perhaps the best way to handle the trail system at the north end of the project is to build a bridge over the creek and commit over a period of years to planting evergreen trees to provide the visual barrier.

Mr. Butcher said the representatives from CDOT and Wilson and Company are present at the meeting to answer any questions.

Larry Royal asked if the six recommendations are for six different locations. Mr. Butcher said yes.

Steve Harris said that he had a question concerning the process and asked if the recommendation that the Board makes today would be incorporated into the draft of the Environmental Assessment.

Doug Eberhart with Wilson and Company said that in the environmental process, they look at all the different environmental factors with noise being one of them. There are criteria for identifying when there is enough of an impact to consider mitigation, which brought them to this point to look at different mitigation options. In the EA, the various options that were evaluated and considered in different locations will be discussed and that the land owners or those whose properties are effected, such as the Parks Department, have a key say in whether or not something that is reasonable and feasible. There are many cases where mitigation is found to be justifiable, warranted, cost effective, etc. but if the adjacent landowner does not want that in there then it will not happen. For that reason, CDOT/Wilson and Company need to know the Board's position.

Mr. Harris asked that after the Board's recommendation, then there will be EA prepared and then that would still be subject to public comments later if other people want to comment on that?

Mr. Eberhart said yes, and there will be a final public hearing at the end of the process and that is a formal public hearing. In addition, there will be informational public meetings planned for late January/early February and it will be presented at that time.

Mr. Eberhart said that as a point of clarification on the pedestrian bridge that Mr. Butcher mentioned earlier, they have been looking at that since that time to see what it might be and what it might do. In general, compared to designing and constructing something that would actually reduce the noise, that would only be done if they can achieve certain amount of reduction. Looking at this proposal, which they have very carefully, they find that the amount of reduction that can actually get from moving the trail would be less than they usually are able to achieve, therefore, they actually have not reached an agreement that this is something that they could in fact be funded through the Federal Highways process but something that they would be in generally in support of. It needs further exploration but they have not reached an agreement that in fact it is something that Federal Highways would be able to fund.

Mr. Royal asked if they could move the bridge further east and pay for it?

Mr. Eberhart said that at the last meeting, that concept was mentioned instead of a berm on Recreation Way. They have been up to the site and had an engineer to look at it and see what the cost and the benefit would be. They have found one minor benefit but perhaps not commensurate with the cost. They have been exploring it and had not closed the loop on that issue and they have agreed to go look at it which they did but it looks like something that they may not in fact do for noise mitigation. It was an option that was explored.

Randy Case asked to clarify what the Board needs to do today and said there are six different options and he is not fond of the walls because he would like to see the other side but does not like the noise.

Mr. Butcher said that this item comes to the Parks Board as one of the parties of interest since the Board has the advisory role on the park issues. The action needed by the Board is a motion to accept, reject, or otherwise modify the recommendations of the Parks and Recreation staff, which is included in the Board packet, as they relate to noise mitigation measures proposed for the Monument Valley Park.

As a part of the EA process, staff will forward a letter and the Board, as an advisory committee and same as any other parties of interest, will have an opportunity to comment in the EA on this issue.

Mr. Case asked if the City has funds to maintain the berms and asked if there are funds from the State or Federal government for that?

Mr. Eberhart said that those are equally in short supply.

Mr. Case asked when berming is done in other localities if there is another way of dealing with it.

Mr. Eberhart said that they are typically designed at a slope such as they can be maintained by a simple mowing once or twice a year.

Mr. Butcher said that it is a current level of maintenance on I-25, which is mowing twice a year by the State.

Getty Nuhn said that her concern is on the Area "F". She said that the park does not seem to be affected much but the trail path is and wanted to know where on the map is the trail that Mr. Butcher mentioned that will be relocated over to the east. She also asked how important the noise mitigation is on that trail and to the neighborhood.

Mr. Butcher said a concern that was raised at the last Board meeting was that there are a number of trails that run adjacent to the roadways (i.e. State highways, Academy Boulevard, Powers Boulevard, I-25, etc.). The Department was not concerned, particularly for the fact that the area that falls within the noise contour is a very short section ( $\approx$  50 feet). The Board said that if the staff was comfortable with it then the Board was okay with it. Mr. Butcher said that the Department will gladly trade 50 feet of trail with noise exceedance over 1500 feet of berming that would cut off all access to the Department and CSU facilities. Staff felt that option might solve both issues; build a bridge that moves the trail over and out of the noise contour and plant trees off the road way outside the noise area and provide a visual barrier. This was laid out to CDOT and Wilson and Company at the last minute so staff has not had a chance to discuss what Mr. Eberhart said earlier. Staff felt that the cost benefit of the 50 feet of trail versus the 1500 feet of berming, which the Department would have to maintain and have all the access cut off, was unacceptable.

Lynn Londry asked if the Area "F" was the only rejection from the Department.

Mr. Butcher said that the Department also had a major concern with the Area "C" Option 1, which took the noise barrier right around the Demonstration Garden. The Department rejected that option because it poses safety concern for park users.

Mr. Londry asked if staff accepts the Areas "A" through "E", with the exception of a couple of concerns in the Area "C". Mr. Butcher said yes, but this is a part of the process that will still continue and that staff does not have to select any particular option at this time

Mr. Londry asked if the Board would have the opportunity to hear further discussions on this subject even if the Board makes a decision today. Mr. Butcher said that Mr. Eberhart mentioned that there will be another process with the Environmental Assessment. After that, this process will be similar to the sound barrier that was put in near the pavilion at the Monument Valley Park where the Board saw the design phase, colors, wall design, etc. Mr. Butcher explained again the actions that the Board could take on the staff recommendation (i.e. accept, reject or modify).

Mr. Royal asked who might be affected on the 50 feet trail other than the walker and runners. Mr. Butcher said that from the noise contour line, trail users who are on the 50 feet of trail are exposed to greater than 66 decibels.

Mr. Eberhart made a comment that the relocation of the trail with a pedestrian bridge is something that could be accomplished under other programs such as the enhancement funding so if it is not done here for the noise mitigation it does not mean that it is something that could not happen and that CDOT would participate in supporting that sort of project.

Mr. Butcher said that is appropriate because the Department did not say that they had to pay for it. The Department found a bridge, any type of bridge and movement on the trail, much more acceptable than the 1500 foot earth berm, maintenance, and the closure of the road.

Chair Rooks Nauer asked for public input.

Allison Jones with the Horticultural Arts Society (HAS) said that they maintain the Demonstration Garden in the Monument Valley Park and they support the choice of the option C.3 for the sound barrier. They are glad that is being considered because they currently have difficulties carrying conversations with the people who are only ten feet away in that garden.

Ms. Jones said another concern was that when the infrastructure work was done along the railroad right-of-way, there was a fence that separated the tracks from the Glen Avenue. The fence has now been down for eighteen to twenty month, since the work has been completed. Ms. Jones asked if CDOT would consider working with the railroad to replace the fence or perhaps replace it with a berm. She said that top of a berm would alleviate the noise and that would be an abatement issue.

Ms. Jones reiterated that HAS endorses option C.3 and would like the fence replaced as a safety issue.

Ralph Spory said that he lives adjacent to the park and he is a park user.

Mr. Spory said that in regards to the 67 decibel contour line that interferes with the 50 feet of the trail described earlier, he said that although the 67 decibel contour touches a small portion of the park the noise level is still loud and intolerable throughout the remainder of the park. It is 67decibels on that contour line but the noise decreases gradually, from 66, 65, and so on to probably 55 decibels, to the east side of the park and anyone that uses the park can say that the park is noisy. It may not be at 67 decibels but it is close that.

Mr. Spory mentioned that he is speaking from the notes that he prepared from what he knew about this issue earlier and it is based on what he thought the proposal was at that time so he may be off a little.

Mr. Spory said that neither the City nor the Parks Department should have an obligation to give up any real estate to mitigate the noise from the freeway. He said that Mr. Butcher has stated in the past that he saw no requirements for the park to give up land to mitigate noise coming from the freeway.

Mr. Spory said that looking at the history, if a proper environmental analysis have been performed prior to the construction and realignment of I-25 that is there now for safety improvements, they would have identified the need for noise mitigation and provided for effective solution at that time. However, that was not done because CDOT used the "Categorical Exclusion" provisions of the Federal regulations and as a part of that process both CDOT and Wilson and Company stated that there was no impact to Monument Valley Park by the improvements to the freeway.

CDOT now has determined that there is a small impact because of their 67 decibel contour line adjacent to the park and proposes some mitigation in the form of walls and berms. However, they claim that there is not sufficient space to construct the walls or berm on CDOT property because of the slope. Mr. Spory said that there are other options besides what they are proposing in the form of walls adjacent and closer to the freeway.

The area on the west side of the freeway south of Fontanero the wall is no more than one lane from the freeway for several hundred yards. He said that it was stated at a meeting that CDOT could not put a wall on the east side of the freeway because of snow removal problem but they have constructed a wall down south at Harrison School. CDOT put a noise wall on the east side of the freeway for noise protection and they were not concerned about snow removal for the slope of the terrain and they were able to do it.

Mr. Spory made a comment that he could not believe that with proper engineering that CDOT cannot find noise solutions adjacent to the freeway and insists that it has to be on the east of the railroad or on park property or city property.

Another issue that Mr. Spory mentioned was the effectiveness of the noise wall that is near the pavilion that is constructed on the east side of the railroad and not adjacent to the freeway. Mr.

Spory said that he attended a numerous events that were held in the pavilion where they used microphones but the audiences still could not hear the speakers even with the noise walls.

Mr. Spory said that he would like to see other options looked at to mitigate the noise in the park. CDOT is only obligated to look at 67 decibels but he thinks that morally they have an issue to look at noise levels less than 67 decibels that affect the rest of the park and with proper engineering, they can find solutions adjacent to the freeway as they did on the west side, which are very effective.

Mr. Spory asked that the Board not approve what is being requested by the CDOT and Wilson and Company but to have them look at other options that do not use city or park land to provide mitigation.

Chesley Miller said that she is with the Friends of Monument Valley Park and is on its Administrative Team. The Friends of Monument Valley Park has been looking at this issue for some time now and they are pleased to see that CDOT has come up with some recommendations for mitigation.

Ms. Miller said that Judith Rice-Jones delivered a letter to the Board this morning with a recommendation that the Board should wait and hold its assessment and opinions until the EA is out in January 2003 to see what recommendations there are according to them concerning the mitigation.

Ms. Miller reminded the Board that it was said at the last Board meeting that the standards would be higher for mitigation if the park is on the National Historic Register. She said that the Friends group has been informed, though it is not official yet and it will come with the EA, that this park will be qualified to be on the National Historic Register. In the meantime, the Friends group is pursuing and doing whatever research they need to do at this time to establish that status.

Ms. Miller said that Wilson and Company said that they do not believe that there is any point in mitigating certain parts of the park because it is not going to do much good. She said that the Friends group is a small group compared to Wilson and Company who has many more resources but the friends group has had help from Dr. Richard Blade, a physics professor from the University of Colorado, who has done far-field noise calculations. The group feels that Dr. Blade's studies are most appropriate and that his findings are different from the CDOT's findings. Dr. Blade said that the mitigation will achieve reduction much farther back into the park than the noise mitigation according to what CDOT will do. Also, if the park has a National Historic Register status, it is not talking about just a trail but the entire park.

Ms. Miller said she goes to rivers or parks on rivers whenever she is in a new town and people who come to this town will seek a walk in a park. This community has a great asset with a park and a river in the middle of the town and she would like to see this park in a different category than from any other parks because it is a centerpiece in the heart of Colorado Springs. This park started to take a shape in 1904 with a donation of land by General Palmer and this is very special, it is the gateway, it is the showcase and it is the heart of the city that needs more attention. The Board should take a special note of this and give a special attention to the status that this park should have in this community.

Also, the Friends group has a different perspective than CDOT concerning the park. Governor Owens has dedicated significant resources towards transportation and CDOT has done a great job with the highways but they did not plan for the park with regards to the noise. Ms. Miller had the opportunity to speak with Governor Owens concerning the impact of I-25 on Monument Valley Park and he said that he was aware that there was very little buffer between the interstate and the park. He believed that it should be a joint city, state and county effort to buffer the park from the interstate. Ms. Miller believes that most mitigation should come from CDOT because they are the ones who put the highway right through the middle of the city. The interstate was built in 1960 when the population was fewer than 60,000 but now there are approximately 500,000 people and there has been nothing done to protect the heart and center of the city and park to this time and the situation is deteriorated.

Ms. Miller said that as a friend of the Monument Valley Park and as a user of the park, she asks that the Board give a full consideration to the absolute highest and best mitigation between the interstate and the park and do everything possible to make the heart of Colorado Springs the most beautiful and most protected place in the park system. She also recommended that the Board consider not making a recommendation today and wait until the EA is in and hear the ultimate status of the National Historic Register eligibility for the Monument Valley Park.

In response to Larry Royal's question, Ms. Miller said that as a part of the EA, they did studies on different aspects of expansion of the interstate. A part of that study revealed by historians is that this park is eligible for Historic Register status. She said that some features go back to General Palmer's time and some features are WPA which is 1950's.

Mr. Royal rephrased his question and asked what affect does the application for the historical recognition have to do with what the Board is going to do today or the EA.

Ms. Miller said that it would be the different standards, higher standards, for mitigation for the park if it is on the Historic Register.

Cindy Cohen said that she is a citizen who has been using the park almost on a daily basis for the past thirteen years, mostly for running and walking. Her children use the park as well.

Over the last several years, since the highway has been expanded and changed, the noise has increased significantly so that Ms. Cohen cannot walk and run without headphones because of the distracting noise and she cannot relax. Ms. Cohen said that it is important that something needs to be done about the noise in the park.

Daisy Chun Rhodes asked if in the EA there be a recommendation for Monument Valley Park to go on the Historic Register? Would a determination be based on the national level? And then once it is on the historic registry, the significance in terms of decibel levels that would make a difference here between our recommendation and what might transpire because of the EA for which seems to be directed towards the historical registration?

Wynetta Massey, Senior Attorney, said she does not know. Ms. Massey is not sure if the EA is done and then the historic designation comes after that, if the EA has to be done over again or it has to be amended.

Mr. Eberhart said that he mentioned earlier that a number of resources will be looked at and how proposed actions would affect to them. One of those is noise and adjacent land use regardless of what that use is. If it is subdivision, noise mitigation may be needed there. If it is the pavilion in the park, studies were done years ago and working with the Parks Board it was determined that was the resource that needed to be protected. The noise studies were done, Categorical Exclusion was pursued and noise mitigation was provided as a result of that. Another resource looked at included historical properties. What is the impact of this action on historical property?

In response to Mr. Royal's question, the process of designating the park as on the Historic Register really has nothing to do with the EA process. That process happens whenever it happens. Generally for most things they are not considered until they are closer to 50 years old, then the State will look at the unique aspects of that resource to determine if it is worthy of being on that list depending on the condition and other things.

Ms. Chun Rhodes asked if there was a difference between the Federal historical and the local noise levels where the decibels are actually counted and determined in terms of its stand from east to west and west to east? Being on Historic Register would either make it possible for a determination as a Board or any recommendation for noise mitigation. She wanted to know what the potential would be if the Board makes a mistake.

Mr. Eberhart said the mitigation proposed is for the purpose of protecting those portions that would be subjected to noise levels about the threshold. It does not change the way that you measure the noise of the threshold. What you look to there is whether or not you are actually making that property unusable for its original intended purpose.

Chair Rooks Nauer asked if there are not two different kinds of standards; one for the historical property and one for the non-historical. Mr. Eberhart said no.

Paula Pearl asked what the advantage was for the Board to wait on the EA for this proposal.

Mr. Eberhart said what the EA will do is to describe the existing environment (what is out there), what is proposed as action, what the expected impacts would be and what is proposed mitigation for those impacts. The decisions along this nature need to be in the EA for the EA to make any conclusions about what the bottom line overall impacts would be. He actively needs to be able to propose mitigation in order to write the EA so you cannot wait for an EA, it would say no decision has been made on what to do about this so it would not be helpful.

Terry Putman, Manager of Park Planning and TOPS, said that there would not be a historical designation by January.

Mr. Eberhart said that was correct. He said that as a part of that process you look to see if there is anything that can be in the future would qualify it and that they are the ones who went through the process to determine that this is an eligible property and be very careful with it.

Steve Harris said that he is not in a very good position to evaluate the different recommendations because he is not an expert in this matter. Also, he does not feel that the Board has been provided with sufficient information to understand what the best alternative is but for that purpose the Board relies on staff and he is comfortable with the staff as they do a good job in evaluating these things.

Mr. Harris said that he would like to include the following in the motion:

1. Include a statement that would reflect "the mitigation to the fullest extent possible." Monument Valley Park is the linear park that is the heart of the city and the Board, as stewards of all parks, has to make it very clear to any decision makers who are looking at these options along the way that the Board want the fullest mitigation that is possible.
2. Even though Mr. Harris agrees that the Board needs to make a recommendation in order for the EA process to go forward and that has to be considered, he would like to see a statement in the motion that states that "to qualify these recommendations that once the EA is out and there is another public comment period that the Board reserves the right to change its opinions after the Board sees what other information there may be included in the EA." The Board/Parks Department, certainly as a group and a concerned stakeholder in this process, needs to have the ability to comment during that public process that would occur after the issuance of the draft EA. Mr. Harris wanted to make it clear that the recommendation of the Board could change after the Board receives more information when the draft document is available.
3. If there will be a process and whatever process there is for registering this site as an historic site, one of the things that Mr. Eberhart mentioned is that one of the consideration would be the condition of the resource. So to the extent that there is increased mitigation that could actually impair the city's ability to list something on the historic register and even though there may not be a difference in the decibel levels or subjective standards that apply, this is a historic site and it dates back more than 50 years and it is a legacy of our founder General Palmer that Mr. Harris urges to keep an eye on this to the extent that we do not preclude the listing of this site as a historic site because of some impacts that later on would deem to prevent that listing.

Randy Case asked if the Confluence Park would be dealt in the same manner.

Mr. Eberhart said that his understanding of Confluence Park is that there is a desire to not have a visual obstruction there. The noise level has been looked at and at the current time there is no mitigation for the noise in the Confluence Park area.

Mr. Case asked if there is going to be mitigation on the highway right-of-way itself.

Mr. Eberhart said to his knowledge, no, and he does not have mitigation proposed for the Confluence Park area.

Mr. Case asked if Gossage Park, up north as the highway continues to be expanded beyond Fillmore, is impacted by highway noise.

Mr. Butcher said when CDOT gets to that point, the Department will look at it.

Mr. Case said that in the proposal in Area C, the height of the walls are identified as 10 feet and 20 feet and asked if the 20 foot wall is going to reduce more sound than the 10 foot wall.

Mr. Eberhart said that depends on the topography and where you are. Generally speaking, the higher wall will block the sound because it does bend over. What that barrier does is protecting the first use beyond it and that provides the maximum benefit. In the case where 20 feet is recommended is because it would be necessary to be that high in order to get a five decibel reduction behind it for the first affected use.

Mr. Case asked what the CDOT is doing in terms of the road surface and asked if they have discussed putting a rubber-based material in the surface of the road to reduce the noise.

Mr. Eberhart said that every aspect of the entire project is a trade off of a number of different things and when it comes to the road surface itself that has a very big impact into that decision as the durability of the surface. The pavement of the surface is based on the life cycle, cost and durability and the noise issue is a minor issue and it is not the primary determining factor in what pavements there would be. CDOT has spent significant time and money looking at the surfacing techniques and different surfaces and he expects to see a concrete surface on I-25.

Mr. Royal said the Sound Barrier "A" (berm) is from 5 feet to 25 feet high and it does not explain how long it is or what dimension.

Mr. Eberhart said it is at the south end of the entire situation, on Bijou Street. Tim Rugg explained that it is the triangular-shaped area in the south part of the map.

Mr. Royal asked how far from the CDOT right-of-way is the base or the eastern edge of the earth berm, the land CDOT is taking from the Park.

Mr. Rugg said the earth berm on Area "A" will be within the CDOT property.

Mr. Royal asked the cost of the earth versus concrete. Mr. Eberhart said that depends on what is being done and it is not a straight equation.

Mr. Royal asked what impact there is on the Areas "B". Mr. Eberhart explained the impacts on the map but the impact is mainly just behind the wall. There is less impact further away from the wall.

In response to Mr. Royal's question concerning the Area "E", Mr. Eberhart said that area is for the neighborhood and not the park.

In response Mr. Harris' question concerning a possible reduction of the speed limit and its impact, Mr. Eberhart said the speed reduction does reduce the noise level but the intended speed limit will remain at the current level of 55 miles per hour. Also, there had been some work done to eliminate some curves and safety-related issues.

Mr. Case is not in favor of the walls since they block the views and prefers to see the greenery and asked if CDOT has consider different alternatives such as the transparent-type walls.

Mr. Eberhart said the wall design that they have in town have been based upon interactive collaborative approach with the community looking at different types of designs, etc. That portion of the work remains to be done to the side exactly as to what these walls would look like.

Chair Rooks Nauer said they looked at berming and tree boundaries but to get the same amount of noise mitigation, there would have to be 200 feet of densely planted trees and but they would have to take a lot of the space from the park. Ms. Rooks Nauer also mentioned that there had been community input at that time that people literally could not hear themselves talk at the pavilion before the walls were built. Even though Ms. Rooks Nauer does not favor the walls but she feels that the walls are a part of the future just because of the mitigation.

Mr. Case said that he is not sure if he will advocate for berming completely and he is concern about the wall, thought that alternative seems to satisfy the neighborhood. He asked if the Parks Department could encourage advising the Board if there is some type of a transparent wall.

Ms. Ryan mentioned a possibility of having the artists' community help with the designing of the walls. Ms. Nuhn agreed.

Mr. Harris said that there should be a barrier between the Railroad property and the Park property.

Mr. Harris thanked the Friends of Monument Valley Park and especially Chesley Miller who represented the Friends group. Mr. Harris encouraged that the Friends group, which plays a large role in advocacy for the park, to submit comments on their own as a non-profit organization and stay with the process until the EA is completely done.

Randy Case made a motion to accept the staff's recommendation as follows:

Area "A" - Accept

Area "B" - Accept

Area "C" - Accept, but clarifying that C has option C.3 identified at two different locations and believes they are intended for both C.3s to be dealt with.

Area "D" - Suggested to state, with emphasis, that the Board has much concern about "crowding" of the park on "D.2" but object to "D.2" being acceptable at all.

Area "E" - This is not a park issue.

Area "F" - Proposed that the Board does not advocate in anyway and harshly object to the closing of the Recreation Way.

The motion should also include the three issues that Mr. Harris mentioned earlier:

1. Mitigation of the fullest extent possible.
2. At public comment, Parks Board reserves right to change its input on the EA.
3. If the mitigation measures adversely impact the park's listing of the historic registry then that be brought back.

Motion seconded by Larry Royal and carried unanimously.

For the purpose of the record, the final recommendations by the Parks Department and CSU, concerning the proposed noise mitigation measures at I-25 and Monument Valley Park, has been attached below.

**Parks, Recreation and Cultural Services**  
**Colorado Springs Utilities**  
**Final Recommendations**  
**I-25 and Monument Valley Park**  
**- Proposed Noise Mitigation Measures -**

**NOTE:** These recommendations pertaining only to the draft Noise Mitigation Plan for the above project may not represent the entirety of the City's official position.

Recommendations: (heading South to North along the park)

**Area "A" Sound Barrier**

Proposed Design: An earth berm from 5' to 25' high.

Location: In CDOT right-of-way between I-25 and railroad.

Area of the Park Receiving Benefit: Southern part of the ballfield and the trails and gardens south of the ballfield.

Position of Park Staff: No objection to earth berm, but at this time the City has no funds for landscape maintenance.

**Area "B" Visual Barrier**

Proposed Design: Additional trees planted between existing large cottonwood trees.

Location: In the park, along the west property line, just south of the existing sound barrier.

Area of the Park Receiving Benefit: This is a visual barrier only (in-fill with lower growing trees blocking the view of highway), no sound benefit.

Position of Park Staff: No objections.

**Area "C" Sound Barrier**

Proposed Design: (Wall Options)

Option C.1: 10' high x 300' long sound barrier (east side of Glen Avenue).

Option C.2: 20' high x 470' long sound barrier (west side of Glen Avenue).

Option C.3: 20' high x 625' long sound barrier (east edge of CDOT ROW).

Location: Option C.1: Between Demonstration Garden and Glen Avenue.

Option C.2: Between Glen Avenue and the railroad ROW.

Option C.3: Between the fence line between the railroad corridor and the highway.

Area of the Park Receiving Benefit: Demonstration Garden.

Position of Park Staff: Eliminate Option C.1 as it poses park-user safety concerns. Option C.3 is preferable, Option C.2 is a consideration.

Comments by Wilson & Co.: C.2 will take away the illegal parking that is currently occurring in the railroad right-of-way. CDOT is not sure if wall can be squeezed in but it is an option under study.

### **Area "D" Sound Barrier**

#### Proposed Design: (Wall Options)

Option D.1: 20' high x 1,060' long sound barrier.

Option D.2: 20' high x 1,080' long sound barrier.

Location: Option D.1: Two segments (in "gore area" and east edge of CDOT ROW between the railroad and the highway).

Option D.2: Between Glen Avenue and the railroad.

Area of the Park Receiving Benefit: This will protect the ponds area and trail south of Uintah Street.

Position of Park Staff: Either option is acceptable but there is some concern that D.2 is closer to the park and may have a "crowding" effect to Glen Avenue and the ponds.

### **Area "E" Sound Barrier**

Proposed Design: 21' high x 750' long sound barrier.

Location: Between Recreation Way and the railroad.

Area of the Park Receiving Benefit: This wall was proposed for the San Miguel residential neighborhood and perhaps may also benefit the park.

Position of Park Staff: Check on Colorado College's plan for acquisition. Stop noise wall (north edge) short of Parks and Recreation building.

### **Area "F" Sound Barrier**

Proposed Design: An earth berm 15' high x approximately 1,500' long.

Location: Replaces portion of Recreation Way between Parks and Recreation Headquarters and Fleet Parking Lot.

Area of the Park Receiving Benefit: Approximately 50' of trail (west side of the creek).

Position of Park Staff: Major concern with closing of Recreation Way and loss of parking lots, maintenance yards and Forestry Operation Center.  
No direct access for vehicles to fuel yards without going on and off I-25. Traffic and City Engineering/Fire would probably object to this long cul-de-sac.  
Proposed that CDOT build a short pedestrian bridge to span Mesa Creek drainage and move trail out of the noise contour area. City to plant screening trees on west side of Recreation Way to provide visual barrier similar to that which exists opposite Headquarters Building.

~~Note: Daisy Chua Rhoades left the meeting at 11:28 a.m. due to a meeting conflict.~~

### ~~Air Force Memorial (Item #1)~~

~~Fred Mais, Manager of Design and Development, said that several months ago, the Board approved the master plan amendment for the Memorial Park to expand the existing War Memorial area to add a second "ring" to accommodate additional memorials. At that time, the Air Force Association expressed an interest in placing an Air Force memorial and said that they would actively pursue a concept plan to bring it forward to the Department for its review.~~



CITY OF COLORADO SPRINGS

March 19, 2003

RECEIVED  
MAR 20 2003

Wilson & Company  
Colorado Springs Office

Doug Eberhart  
Senior Transportation Planner  
Wilson and Company  
455 E. Pikes Peak Avenue, Suite 200  
Colorado Springs, CO 80903

Dear Doug,

Attached please find a memo from myself to the Colorado Springs Parks and Recreation Advisory Board regarding noise issues in the proposed Confluence Park. This memo was in response to Board member requests for an update on I-25 noise contours along the corridor. As you can see from the attached document, I summarized the meeting between you, myself, Tim Rugg, Jim Rees and Fred Mais on February 27, 2003. The memo was included in the March 13, 2003 Parks and Recreation Advisory Board agenda packet as information to the Board. This is a common practice for issues where the Board wants additional information without requesting a full presentation. During the agenda section entitled "Board Member Concerns/Discussion", no request was made for further clarification of the matter.

Tim Rugg suggested I forward this item to your attention for your files.

Sincerely,

Paul D. Butcher  
Director  
Parks, Recreation and Cultural Services





CITY OF COLORADO SPRINGS

AGENDA

Parks and Recreation Advisory Board  
March 13, 2003 7:30 a.m.  
1401 Recreation Way

CITIZEN DISCUSSION

Time for any individual to bring before the Parks and Recreation Advisory Board any matter of interest they wish to discuss that is not on the agenda.

APPROVAL OF MINUTES

Minutes from February 13, 2003 meeting

PRESENTATION

- 1. Annual State of the Urban Forest Report Jim McGannon, Manager, Forestry

CONTINUING BUSINESS

- 2. Prospect Lake Beach Update J.J. Kliikus, Manager, Youth and Recreation
- 3. Revisions to Park Planning Policies Terry Putman, Manager, Park Planning and TOPS

NEW BUSINESS

- 4. United States Submarine Association Memorial Fred Mais, Manager, Design and Development

TOPS BUSINESS

- 5. Appropriation for High Chaparral Open Space Trailhead Chris Lieber, TOPS Administrator
- 6. Appropriation for Bluestem Prairie Open Space Trailhead Chris Lieber, TOPS Administrator
- 7. Appropriation for La Foret Trail Chris Lieber, TOPS Administrator

BOARD BUSINESS

- > Board Committee Reports
- > Board Members Concerns/Discussions

DIRECTOR'S REPORT



## Items of Information for Parks and Recreation Advisory Board Members

☞ Update on Cheyenne Mountain State Park

📎 Attachments:

- Letter to Marge McCarthy Concerning Hot Tub at Cottonwood Creek Recreation Center
- Memo from Paul Butcher Regarding Issues Surrounding Confluence Park

✂ Calendar of Events:

- Thursday, March 13, 3:30 p.m. - Sand Creek Trail Bridge Dedication at the El Pomar Youth Sports Complex along the Pikes Peak Greenway
- Monday, March 17, 9:30 a.m. - SCIP Shooks Run Drainage Project on the Shooks Run Trail, South of Kiowa and El Paso Streets
- Friday, May 2, 9:00 a.m. - Arbor Day Event at the Vera Scott Elementary School

📄 Articles from the Cheyenne Edition, February 14, 2003

1. "City pushes ahead to protect view from Pioneer's Museum"
2. "Insects wreak havoc on drought-stressed trees"
3. "Boy's paradise"

📄 Articles from the Gazette

1. "Works of art by chain saw sculptors emerge from drought-stricken trees", February 10, 2003
2. "Springs wants to deter new lawns in hot months", February 10, 2003
3. "A small coffin, a big loss", February 24, 2003
4. "TOPS extension would help preserve open space" and "Trails group, TOPS are not the same thing", February 27, 2003
5. "Past becomes personal quest: Curiosity leads researcher on journey to her heritage", March 3, 2003
6. "TOPS extension sets apart candidates", March 4, 2003
7. "Snow just not enough: Recent moisture helps, but much more needed to reverse drought", March 4, 2003

Thank you Letter from:

1. Raul Acosta on behalf of Terry Putman, Manager of Park Planning and TOPS

📄 Minutes:

- Parks and Recreation Advisory Board Minutes - February 13, 2003
- TOPS Working Committee Minutes - February 12, 2003
- Garden of the Gods Advisory Committee Minutes - January 23, 2003 and February 26, 2003



CITY OF COLORADO SPRINGS

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

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

NOISE

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

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

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

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

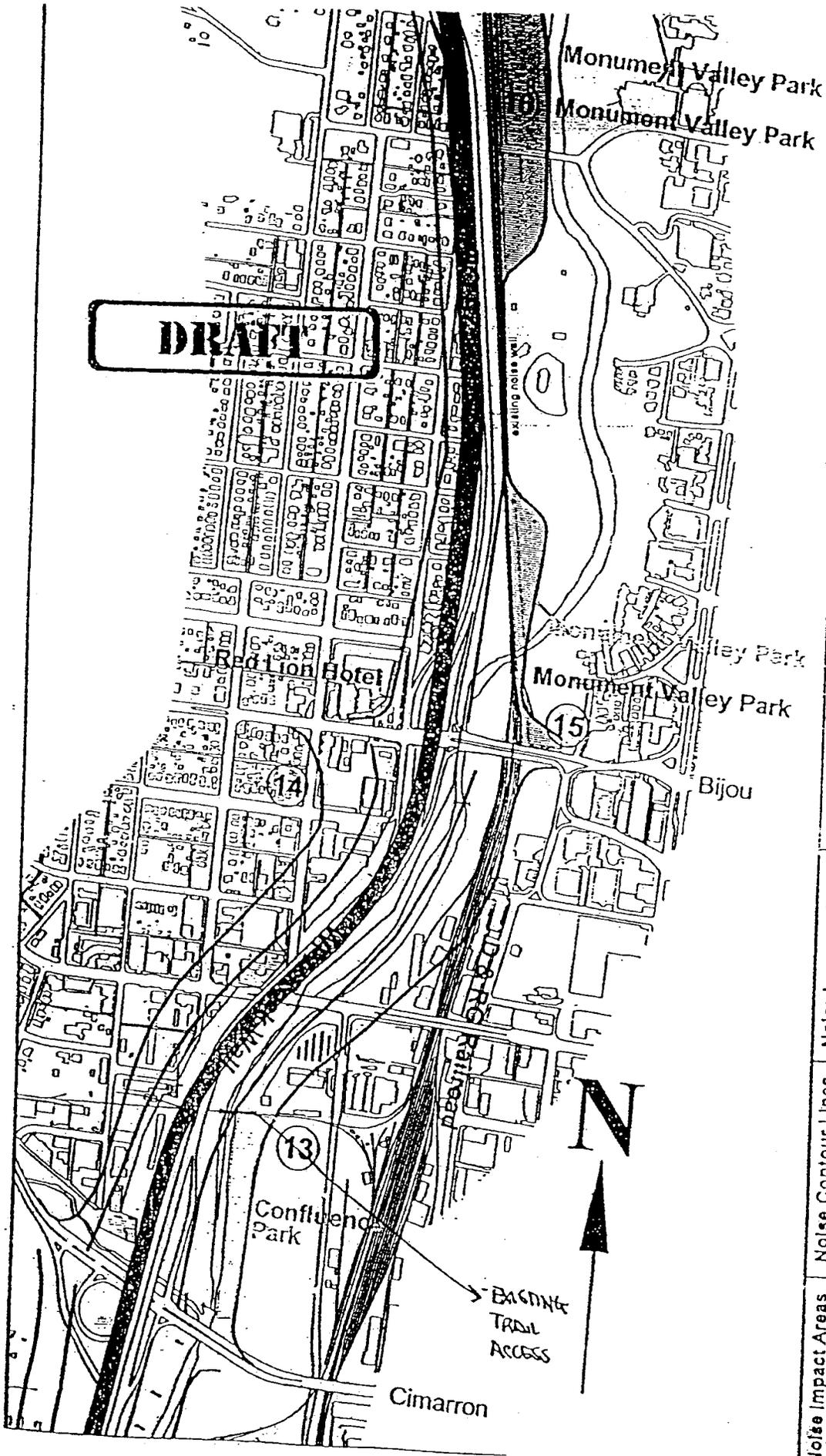
### TRAIL ACCESS

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

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

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

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

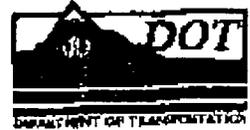


<p><b>Noise Impact Areas</b></p> <ul style="list-style-type: none"> <li><span style="display: inline-block; width: 10px; height: 10px; background-color: black; margin-right: 5px;"></span> Residential</li> <li><span style="display: inline-block; width: 10px; height: 10px; background-color: gray; margin-right: 5px;"></span> Commercial</li> <li><span style="display: inline-block; width: 10px; height: 10px; border: 1px solid black; margin-right: 5px;"></span> Parks</li> <li><span style="display: inline-block; width: 10px; height: 10px; border: 2px solid black; margin-right: 5px;"></span> Protected</li> </ul>		<p><b>Noise Contour Lines</b></p> <ul style="list-style-type: none"> <li><span style="display: inline-block; width: 10px; height: 10px; border: 1px solid black; margin-right: 5px;"></span> 71 dB(A)</li> <li><span style="display: inline-block; width: 10px; height: 10px; border: 2px solid black; margin-right: 5px;"></span> 85 dB(A)</li> </ul>		<p><b>Noise Increase Points</b></p> <p>⊕ Predicted 1990 to 2025</p>		<p><b>Hankard Environmental</b></p> <p>100 East Simpson St.          Lafayette, Colorado 80028          Phone: 303-444-0417          Fax: 303-666-1025</p>		<p><b>I-25 Colorado Springs EA          Noise Analysis Site Plan          Year 2025</b></p>		<p><b>Figure 3.7</b></p>	
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# STATE OF COLORADO

## DEPARTMENT OF TRANSPORTATION

4201 East Arkansas Avenue  
Denver, Colorado 80222  
(303) 757-8011



January 20, 2004

Margie Perkins  
Director  
Air Pollution Control Division  
Colorado Department of Public Health and Environment  
4300 Cherry Creek Drive South  
Denver, CO 80222

Re: I-25 Corridor in Colorado Springs

Dear Ms. Perkins:

The Colorado Department of Transportation is preparing an environmental assessment for the proposed widening of 26 miles of I-25 through Colorado Springs. In order to determine the air quality impacts of the proposed project, CDOT analyzed all affected intersections in the project area that would operate at level of service D, E, or F in future years, for both the No-Action and Proposed Action Alternatives to determine any potential exceedances of carbon monoxide National Ambient Air Quality Standards (NAAQS).

The highest modeled eight-hour average carbon monoxide concentrations were 7.8 ppm in 2007, 8.4 ppm in 2015, and 8.8 ppm in 2025. Therefore, this project will not cause or contribute to an exceedance of the eight-hour average carbon monoxide NAAQS of 9.0 ppm. (See attached Air Quality Technical Report)

This project is included in the conforming 2025 Regional Transportation Plan (RTP) for the Colorado Springs Urbanizing Area (*Destination 2025 Plan*) and the conforming 2004-2009 Transportation Improvement Program.

If you concur with the results of the air quality analysis and the conclusions regarding conformity of this project, please sign below and return this letter by February 3, 2004.

Thank you.

Very truly yours,

Bradley J. Beckham  
Manager  
Environmental Programs Branch

I Concur:

Margie M. Perkins  
Margie Perkins, Director

January 27, 2004  
Date





DEPARTMENT OF THE ARMY  
ALBUQUERQUE DISTRICT, CORPS OF ENGINEERS  
SOUTHERN COLORADO REGULATORY OFFICE  
720 NORTH MAIN STREET, SUITE 203  
FURBER, COLORADO 81063-3045  
FAX (719) 842-9475

REPLY TO  
ATTENTION OF:

May 9, 2002

Operations Division  
Regulatory Branch

Ms. Janetta Shepard  
Aquatic and Wetland Company  
1830 17th Street  
Suite 100  
Boulder, CO 80302

Dear Ms. Shepard:

This replies to your March 22, 2002, letter requesting a Section 404 jurisdictional determination for waters of the United States along I-25 from the town of Monument (Exit 161) to South Academy Boulevard (Exit 132.5) in Colorado Springs, El Paso County, Colorado. We have assigned Action No. 2002 00318 to this request.

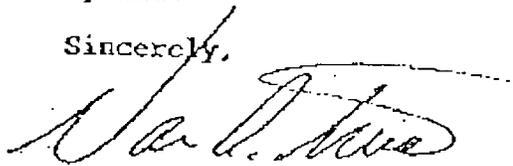
We have evaluated the information you provided and concur with your findings of waters of the United States within the project site. The corridor includes Monument and Fountain Creeks, and their tributaries, and adjacent wetlands regulated under provisions of Section 404 of the Clean Water Act. The jurisdictional boundaries are described in the document you provided.

This jurisdictional determination will be valid for 5 years from the date of this letter unless new information warrants revision of the determination before the expiration date. Please note that this Corps of Engineers' wetland delineation concurrence is specifically for Clean Water Act jurisdiction and does not serve the purposes of the Food Security Act or other federal, state, or local requirements.

A Department of the Army permit may be required for the discharge of dredged or fill material into these waters. If you

have any questions about this determination or permit requirements, please feel free to contact me at (719) 543-6915 or by email at [van.a.truan@usace.army.mil](mailto:van.a.truan@usace.army.mil).

Sincerely,

A handwritten signature in black ink, appearing to read "Van A. Truan". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Van A. Truan  
Chief, Southern Colorado  
Regulatory Office



DEPARTMENT OF THE ARMY  
ALBUQUERQUE DISTRICT, CORPS OF ENGINEERS  
SOUTHERN COLORADO REGULATORY OFFICE  
720 NORTH MAIN STREET, SUITE 205  
PUEBLO, COLORADO 81003-3040  
FAX (719) 543-9475

REPLY TO  
ATTENTION OF:

July 24, 2002

Operations Division  
Regulatory Branch

Ms. Janetta Shepard  
Aquatic and Wetland Company  
1830 17th Street  
Suite 100  
Boulder, CO 80302

Dear Ms. Shepard:

This replies to your June 12, 2002, addendum letter requesting a Section 404 jurisdictional determination for waters of the United States for the proposed jurisdictional determination site along the I-25 corridor in Colorado Springs, El Paso County, Colorado. We have assigned Action No. 2002 00318 to this request.

We have evaluated the information you provided and concur with your findings of waters of the United States within the project site. The corridor includes jurisdictional waters that are regulated under provisions of Section 404 of the Clean Water Act.

This jurisdictional determination will be valid for 5 years from the date of this letter unless new information warrants revision of the determination before the expiration date. Please note that this Corps of Engineers' wetland delineation concurrence is specifically for Clean Water Act jurisdiction and does not serve the purposes of the Food Security Act or other federal, state, or local requirements.

A Department of the Army permit may be required for the discharge of dredged or fill material into these waters. If you have any questions about this determination or permit

requirements, please feel free to contact me at (719) 543-6915 or  
by email at [van.a.truan@usace.army.mil](mailto:van.a.truan@usace.army.mil).

Sincerely,

**GENSIS**

Van A. Truan  
Chief, Southern Colorado  
Regulatory Office

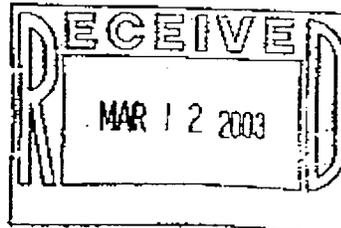
STATE OF COLORADO  
Bill Owens, Governor  
DEPARTMENT OF NATURAL RESOURCES  
**DIVISION OF WILDLIFE**

AN EQUAL OPPORTUNITY EMPLOYER

Russell George, Director

Southeast Region:  
4255 Sinton Road  
Colorado Springs, Colorado 80907

Telephone: (719)227-5200



*For Wildlife  
For People*

March 11, 2003

Ms. Anita Culp  
U.S. Army Corps of Engineers  
Southern Colorado Regulatory Office  
720 North Main Street, Room 205  
Pueblo, Colorado. 81003-3046

Re: The use of the Limon Wetland Mitigation Bank for impacts associated with Colorado Department of Transportation Interstate 25 Corridor Project.

Dear Ms. Culp,

The Division has reviewed the above referenced proposal and is familiar with both sites. However, we do not know the extent of the wetland impacts associated with the project. We offer the following comments for your consideration.

The Division's concern is that the impacts related to the I-25 Corridor Project will impact both Preble's Meadow Jumping Mouse (PMJM) habitat and Arkansas Darter habitat. PMJM is a federally threatened species and the Arkansas Darter is a state threatened species. PMJM occupies the northern portion of the watershed on Monument Creek and the Arkansas Darter exists in the southern portion of the watershed on Fountain Creek.

The Division feels that mitigating wetland impacts at the Limon Wetland Mitigation Bank (LWMB) will not be 'in-kind' replacement of wetlands. The LWMB is a complex of small Shortgrass Prairie pools (a lentic environment) which doesn't offer the same wetland values that are being impacted. Potential impacts will occur in a lotic environment along Fountain and Monument Creeks. The bank is not located in the range of PMJM or presently occupied/potential habitat for Arkansas Darter, furthermore, the location is not within the same Hydro Unit Code. The Division recommends CDOT and Walsh Environmental Scientists and Engineers, LLC. explore other mitigation alternatives that meet the criteria of 'in-kind' and within the same Hydro Unit Code before mitigation is approved at the LWMB.

The Division suggests mitigation alternatives along Fountain Creek, Jimmy Camp Creek, or Williams Creek in southern portions of the project area to alleviate impacts for Arkansas Darters. Arkansas Darters are highly selective in their habitat requirements; they prefer clear, cool water with sand and gravel substrate. The presence of adequate aquatic vegetation typically associated with springs is extremely important. For PMJM impacts, we recommend that mitigation occur in Monument Creek and/or tributaries that currently support mice.

We appreciate having this opportunity for input. Please feel free to contact should you have questions or concerns.

Sincerely,

A handwritten signature in cursive script that reads "Casey Cooley".

Casey Cooley, Habitat Biologist

Cc: Doug Krieger, Southeast Senior Aquatic Biologist  
Gary Dowler, Area Aquatic Biologist

DEPARTMENT OF NATURAL RESOURCES, Greg E. Walcher, Executive Director  
WILDLIFE COMMISSION, Rick Enstrom, Chair • Robert Shoemaker, Vice-Chair • Marianna Rafiopoulos, Secretary  
Members, Bernard Black • Tom Burke • Jeffrey Crawford • Philip James • Brad Phelps • Olive Valdez





DEPARTMENT OF THE ARMY  
ALBUQUERQUE DISTRICT, CORPS OF ENGINEERS  
SOUTHERN COLORADO REGULATORY OFFICE  
720 NORTH MAIN STREET, SUITE 205  
PUEBLO, COLORADO 81003-3046  
FAX (719) 543-9475

March 27, 2003

REPLY TO  
ATTENTION OF:

Operations Division  
Regulatory Branch

Ms. Janetta Shepard  
Walsh Environmental Scientists  
and Engineers, LLC  
4888 Pearl East Circle, Suite 108  
Boulder, Colorado 80301-2475

Dear Ms. Shepard:

This is in reference to your February 21, 2003 letter regarding your proposed I-25 corridor improvements from Monument to Fountain in El Paso County, Colorado, Action No. 2002-00318.

We have studied the Limon Pilot Banking Instrument. The intent of the Limon Bank was to provide the Colorado Department of Transportation with mitigation for highway project impacts within the Environmental Protection Agency's ecological subregions of Southwest Tablelands (26) and Grasslands (26-1). Before project impacts can be debited from the bank, it must first be demonstrated that the wetland impacts have been first avoided and then minimized, and lastly that there are no practicable on-site mitigation opportunities or that on-site mitigation would produce wetlands of low or marginal functions, or that the mitigation would be prone to failure.

We have determined that only part of the I-25 corridor from Monument to Fountain qualifies as Southwest Tablelands and Grasslands. The highway corridor south of and including the Cottonwood Creek drainage basin meets the bank's ecoregion description. The corridor north of the Cottonwood Creek basin does not meet the ecoregion description.

Therefore, once avoidance, minimization, and on-site mitigation opportunities have been demonstrated to be not practicable, wetland impacts on the I-25 highway corridor within and south of the Cottonwood Creek drainage basin would be eligible for debiting from the Limon Wetland Bank.

Comments on your letter were solicited from the Mitigation Banking Review Team. A copy of the Division of Wildlife's letter which discusses the state-threatened species, the Arkansas Darter, is provided for your information. If you have any questions please feel free to write or call me at (719) 543-6914 or e-mail me at [anita.e.culp@usace.army.mil](mailto:anita.e.culp@usace.army.mil).

Sincerely,



Anita E. Culp  
Senior Project Manager

Enclosure

Copy furnished:

Ms. Alison Michael  
US Fish and Wildlife Service  
Colorado Field Office  
P.O. Box 25486 DFC  
Denver, CO 80225-0207

Mr. Brent Truskowski (8EPR-EP)  
Environmental Protection Agency  
999 - 18th Street, Ste 500  
Denver, CO 80202-2405

Mr. Casey Cooley  
Colorado Division of Wildlife  
2126 North Weber  
Colorado Springs, CO 80907

Ms. Judy DeHaven  
Colorado Department of Transportation  
P.O. Box 536  
Pueblo, CO 81002-0536



U.S. Department  
Of Transportation  
Federal Highway  
Administration

Colorado Federal Aid Division  
555 Zang Street, Room 250  
Lakewood, CO 80228-1040

March 6, 2003

Mr. LeRoy W. Carlson  
U.S. Fish and Wildlife Service  
Biological Services  
755 Parfet Street, Room 361  
Lakewood, Colorado 80215

Attention: Ms. Alison Michael

Dear Mr. Carlson:

Subject: Project IM 0252-316, I-25 Corridor EA  
Request for Programmatic Section 7 Consultation

The Colorado Department of Transportation (CDOT), with the participation of the Federal Highway Administration (FHWA), is planning three highway projects in El Paso County that will affect habitat and populations of the Preble's meadow jumping mouse. This small mammal was listed as threatened under provisions of the Endangered Species Act in 1998. The three project areas include I-25 north of Colorado Springs, Powers Boulevard between SH 83 and I-25, and the new Shoup Road/SH 83 intersection. FHWA requests a programmatic section 7 consultation with the U.S. Fish and Wildlife Service, as required by the Endangered Species Act.

The majority of the proposed impacts will be to habitat along existing roadways. Some of the project impacts lie within areas that have been proposed as critical habitat by the U.S. Fish and Wildlife Service. Project impacts will take place in both the riparian and adjacent upland habitat areas, with most areas in close proximity to existing sections of highway.

Project descriptions, biological impacts, and off-setting conservation measures are described in the attached programmatic biological assessment (PBA). The PBA contains details on project activities that affect Preble's, biological consequences of these actions, cumulative effects, effects on proposed critical habitat, and procedures for permitting and amending specific projects.



Impacts to habitat were avoided and minimized where possible, but a total of 61.86 acres of Preble's habitat may be affected by project actions (25.7 acres of permanent impact, 36.16 acres of temporary impact). It is anticipated that these impacts are worst case scenarios and that there will be opportunities to further reduce impacts during final design plans.

CDOT and FHWA have been working on conservation goals strategies for several years. Workshops with Preble's experts and modeling exercises showed that there are at least six separate Preble's populations in the Monument Creek watershed, and restoring habitat linkages among these populations would be the most important strategy for achieving recovery.

CDOT/FHWA designed a conservation package with specific measures that would address the goal of Preble's recovery. The package has four sections:

1. On-site actions that include restoration, enhancement and creation of Preble's habitat that is within or near project disturbance areas. Best management practices will be implemented as appropriate;
2. Off-site actions that will include restoring habitat linkages in at least two areas, and permanently protecting an additional 50 acres of habitat within two riparian corridors where previous CDOT/FHWA protection efforts have already been successful. The two corridors are Dirty Woman Creek (including the confluence area with Monument Creek) and Jackson Creek. Additional habitat restoration/enhancement will be conducted on some of these properties as needed;
3. Monitoring to assure that disturbance areas do not exceed permitted amounts, and to gauge the success of restoration efforts. Special monitoring programs will be conducted at habitat linkage areas to determine success of restoring connectivity among Preble's populations; and
4. A research project to determine the effectiveness of small mammal ledges in culverts; successful treatments will be incorporated into future culvert design and construction.

Although these projects will result in alteration and loss of Preble's habitat, they will not cause habitat fragmentation and loss of connectivity within and between populations in the project areas. Habitat connectivity and mouse mobility will improve at some project sites by improved culvert and bridge designs. Most project actions will occur within habitat that supports low density Preble's populations, and the nature of the impacts and subsequent restoration actions will allow populations in project areas to recover, including areas that have critical habitat.

In the opinion of FHWA, the proposed highway construction projects avoid and minimize impacts to Prebles to the greatest practical extent. Although the projects are likely to adversely affect PMJM, they are not likely to destroy or adversely modify proposed critical habitat. FHWA also believes the collective on-site and off-site conservation actions will allow affected Preble's populations to recover to pre-disturbance levels and promote persistence of a large Preble's population in El Paso County.

We ask the Service to review the material provided and issue a Programmatic Biological Opinion.

Please contact Ms. Edrie Vinson of FHWA at (303) 969-6730, ext. 378, or Mr. Roland Westl at CDOT-DTD at (303) 757-9788, if you have any questions or if you need additional information.

Sincerely yours,



William C. Jones  
Division Administrator

Enclosures:

cc: Mr. Thomas Norton, Executive Director, CDOT, Attention: Mr. George Gerstle,  
Intermodal Planning, CDOT  
Ms. Rebecca Vickers, Environmental Programs, CDOT  
Mr. Dick Amund, Region 2, CDOT  
Mr. Roland Westl, Environmental Planning, CDOT





U.S. Department  
Of Transportation  
Federal Highway  
Administration

Colorado Federal Aid Division  
555 Zang Street, Room 250  
Lakewood, CO 80228-1040

March 6, 2003

Mr. LeRoy W. Carlson  
U.S. Fish and Wildlife Service  
Ecological Services  
755 Parfet Street, Room 361  
Lakewood, Colorado 80215

Attention: Ms. Alison Michael

Dear Mr. Carlson:

Subject: Project IM 0252-316, I-25 Corridor BA  
Request for Programmatic Section 7 Consultation

The Colorado Department of Transportation (CDOT), with the participation of the Federal Highway Administration (FHWA), is planning three highway projects in El Paso County that will affect habitat and populations of the Preble's meadow jumping mouse. This small mammal was listed as threatened under provisions of the Endangered Species Act in 1998. The three project areas include I-25 north of Colorado Springs, Powers Boulevard between SH 83 and I-25, and the new Shoup Road/SH 83 intersection. FHWA requests a programmatic section 7 consultation with the U.S. Fish and Wildlife Service, as required by the Endangered Species Act.

The majority of the proposed impacts will be to habitat along existing roadways. Some of the project impacts lie within areas that have been proposed as critical habitat by the U.S. Fish and Wildlife Service. Project impacts will take place in both the riparian and adjacent upland habitat areas, with most areas in close proximity to existing sections of highway.

Project descriptions, biological impacts, and off-setting conservation measures are described in the attached programmatic biological assessment (PBA). The PBA contains details on project activities that affect Preble's, biological consequences of these actions, cumulative effects, effects on proposed critical habitat, and procedures for permitting and amending specific projects.

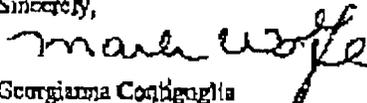


Monument Valley Park (SEP.613) and Monument Valley Park, Bijou Street Entrance (SEP.613.13): We do not concur with CDOT's finding of "no historic properties affected." We believe that the raising of Bijou Street, the introduction of a retaining wall, and the addition of a safety railing atop said wall changes the feeling, function, and design of this portion of the park. The wall and railing creates a visual and physical barrier where none existed before (and where none was planned to exist). Therefore, we find that the proposed changes to this corner of the park will result in an adverse effect. We believe that the adverse effect can be mitigated with Level I documentation of the park and the entrance gate prior to construction. Please refer to *CAHP #1595: Historic Resource Documentation, Standards for Level I, II, and III Documentation* for further information on Level I documentation.

St. Mary's School, SEP.3854: The project ends less than 50 feet from this property. There will be no adverse effect to the school, but we feel that the closeness of the project warrants a finding of "no adverse effect" instead of "no historic properties affected."

If you have any questions, please feel free to contact Joseph Saldívar, Architectural Services Coordinator, at (303) 666-3741. We look forward to hearing from you.

Sincerely,



for Marianna Conbigglio  
State Historic Preservation Officer, and  
President, Colorado Historical Society



**COLORADO  
HISTORICAL  
SOCIETY**

The Colorado History Museum 1100 Broadway Denver, Colorado 80203-2137

2 February 2004

Brad Beckham  
Program Manager  
Colorado Department of Transportation  
Environmental Programs Branch  
4201 East Arkansas Ave.  
Denver, CO 80222

RE: Determinations of Eligibility and Effect, CDOT Project EM 0252-316, Interstate 25  
Environmental Assessment, Improvements Through the Colorado Springs Urbanized  
Area, Colorado Springs, El Paso County

Dear Mr. Beckham:

Thank you for your recent correspondence dated 8 January 2004, concerning the expansion of Interstate 25 through the urbanized portion of Colorado Springs. Our office has reviewed the submitted environmental reports, architectural inventory forms, maps, and photographs. We have also incorporated the results of the meeting held between SHPO, CDOT, and FHWA on 23 January 2004. Our comments are as follows:

We concur with CDOT's determinations of eligibility for all but the following properties:

**Colorado College, SEP.611:** The college has not been surveyed in a thorough manner. While the entire college is probably not eligible for listing, further investigation may uncover a limited historic district or districts within the boundaries of the campus.

**Stratton Meadows, SEP.4224:** This district may be eligible under Criteria "A" and "C" as a significant example of pre-fab housing and of Colorado Springs' rapid post-WWII growth. Although the district is not 50 years old, it may meet the "exceptional significance" criteria exemption ("G"), developed by the National Park Service to evaluate properties less than 50 years of age.

Although we disagree with the findings of eligibility, we concur with CDOT's assessment that the project shall result in a finding of "no historic properties affected" for both Colorado College and Stratton Meadows.

We concur with CDOT's determinations of effect for all but the following properties:

---

**OFFICE OF ARCHAEOLOGY AND HISTORIC PRESERVATION**

303-866-3192 • Fax 303-866-2711 • E-mail: oahp@ch.sate.co.us • Internet: www.coloradohistory-oahp.org

showing the rear of the structure, detailed photographs of the ironwork, and detailed photographs of the area in which the wall and steps will be installed. In your MOA, we suggest listing Level I documentation as the means of mitigating the adverse effect to the Park and the Entrance Gate. Again, this does not mean that CDOT will be required to submit any further documentation with the exception of the photographs requested in this paragraph.

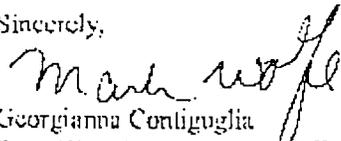
- At the meeting of 23 January 2004, we discussed the relative severity of the "adverse effect" to Monument Valley Park and the associated entrance gate. The National Historic Preservation Act does not provide for language such as minimal adverse effect, "severe adverse effect," and the like. Only "no adverse effect" or "adverse effect" are acceptable. However, in practice this leads to a wide variety of projects being grouped under the broad heading of "adverse effect." In the case of the Bijou Street Bridge and Monument Valley Park/Bijou Street Entrance, the effect is adverse but relatively minor. Clearly it is not in the same realm as the demolition of an historic building or structure. However, we feel that the qualities that make the park and the entrance gate eligible are being diminished by this project. In the case of Monument Valley Park itself, only a small portion of the park is being affected by the project. The law still requires us to declare a finding of "adverse effect" on the entire Park even though only a component of the Park is being adversely affected by the proposed project.

Thank you for bringing your concerns to our attention.

As a normal and statutorily mandated part of the process, a Memorandum of Agreement (MOA) will be negotiated and executed. The City of Colorado Springs, as a Certified Local Government (CLG), is a consulting party and needs to be part of the MOA process.

If you have any questions, please feel free to contact Joseph Saldibar, Architectural Services Coordinator, at (303) 866-3741. We look forward to hearing from you.

Sincerely,

  
Georgianna Conliguglia  
State Historic Preservation Officer, and  
President, Colorado Historical Society

cc: Tim Seanlem, City of Colorado Springs



March 12, 2004

William C. Jones  
Division Administrator  
Federal Highway Administration  
555 Zang Street, Room 250  
Lakewood, CO 80228-1040

REF: *Monument Valley Park – I-25, Highway Improvements, IM 0252-316.*

Dear Mr. Jones:

We received your notification and supporting documentation regarding the adverse effects of the referenced project, a property eligible for inclusion in the National Register of Historic Places. Based upon the information you provided, we do not believe that our participation in consultation to resolve adverse effects is needed. However, should circumstances change, please notify us so we can re-evaluate if our participation is required. Pursuant to 36 CFR 800.6(b)(iv), you will need to file the Memorandum of Agreement, and related documentation at the conclusion of the consultation process. The filing of this Agreement with the ACHP is necessary to complete the requirements of Section 106 of the National Historic Preservation Act.

Thank you for providing us with your notification of adverse effect. If you have any questions, please contact Carol Legard at 303/969-5110 or via eMail at [clegard@achp.gov](mailto:clegard@achp.gov).

Sincerely,

Nancy Kochan  
Office Administrator/Technician  
Western Office of Federal  
Agency Programs

ADVISORY COUNCIL ON HISTORIC PRESERVATION

12136 West Bayaud Avenue, Suite 330 • Lakewood, Colorado 80228  
Phone: 303-969-5110 • Fax: 303-969-5115 • [achp@achp.gov](mailto:achp@achp.gov) • [www.achp.gov](http://www.achp.gov)



# STATE OF COLORADO

DEPARTMENT OF TRANSPORTATION  
Environmental Programs  
4201 East Arkansas Avenue  
Denver, Colorado 80222  
(303) 757-9259



April 21, 2003

RECEIVED

Ms. Georgianna Contiguglia  
State Historic Preservation Officer  
Colorado Historical Society  
1300 Broadway  
Denver, CO 80203

APR 24 2003

CHS/OAHP

SUBJECT: Determinations of Eligibility and Effect for CDOT Project IM 0252-316, I-25 Corridor  
EA, El Paso County

Dear Ms. Contiguglia:

Enclosed for your review is the archaeological survey report and associated site forms for the CDOT project referenced above. The undertaking entails completion of an Environmental Assessment (EA) for a nearly 30-mile segment of Interstate 25 in El Paso County, extending from milepost 131.9 south of Colorado Springs to milepost 160.4, the Monument interchange near the El Paso/Douglas County line. One prehistoric site within the corridor (SEP211) initially evaluated as potentially eligible for listing on the National Register of Historic Places, and that cannot be avoided by the proposed highway improvements, was subjected to a test excavation program; the results of that testing are also included in the accompanying report. The archaeological fieldwork and report were completed by Centennial Archaeology, Inc., under contract to CH2M Hill through Wilson & Company, CDOT's primary consultant for the NEPA documentation and preliminary engineering.

The survey resulted in the identification and evaluation of 34 sites and isolated finds, of which 29 were previously recorded and 5 newly documented. Three prehistoric sites (SEP755, SEP2239, SEP2245) are assessed as potentially eligible for nomination to the National Register based on the perceived potential for intact cultural strata important in regional prehistory, and one prehistoric site (SEP211) is evaluated as NRHP eligible based on the results of test excavations, as referenced above. One historic archaeological site (SEP3946, the Mill Street Dump) was determined NRHP eligible in September 2001, an assessment which was corroborated by the field and archival research completed for the present undertaking. The remaining 29 sites and isolated finds are recommended as not eligible for inclusion on the National Register, and no further work is required for these localities.

CDOT has reviewed the results obtained by Centennial Archaeology and concurs with the eligibility and effects determinations for the resources outlined herein and in the report. Based on the current level of design for proposed improvements along the I-25 corridor, only site SEP211 will be disturbed during construction, whereas the remaining four eligible and potentially eligible sites (SEP755, SEP2239, SEP2245, SEP3946) will be avoided, and therefore no historic properties affected. SEP211 appears to be of importance chiefly because of what can be learned through data recovery excavations, and has minimal value for preservation in place. As such, controlled data recovery will be initiated prior to construction, and will serve as mitigation of adverse effects as required under Section 106 of the National Historic Preservation Act and the Advisory Council on Historic Preservation's regulations (36 CFR 800). Consultation with Native American tribes is on-going for the project, and the input of interested tribes regarding SEP211 will be solicited as the undertaking progresses.

Ms. Contiguella  
April 21, 2003  
Page 2

In order to fulfill our obligations as outlined in Section 106 and the Advisory Council's regulations, we request your concurrence with the eligibility and effects determinations discussed herein and detailed in the enclosed report. Should you have questions or require additional information in order to complete your review, please contact me at (303)757-9631.

Very truly yours,



Dan Jepson  
Acting Environmental Programs Manager

Enclosures (report and site forms)

cc: ~~Re: Colorado Highway~~  
J. DeHaven (CDOT Region 2)  
RF/CF

I concur

  
Susan M. Collins  
State Historic Preservation Officer

Date April 30, 2003







# STATE OF COLORADO

DEPARTMENT OF TRANSPORTATION  
Environmental Programs  
4201 East Arkansas Avenue  
Denver, Colorado 80222  
(303) 757-9259



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



Colorado Federal Aid Division  
555 Zang Street, Room 250  
Lakewood, CO 80226-1040

September 17, 2003

Mr. William L. Pedro  
NAGPRA Representative  
Cheyenne and Arapaho Tribes of Oklahoma  
P.O. Box 41  
Concho, OK 73022

Dear Mr. Pedro:

**SUBJECT:** Results of the September 9, 2003 Consultation Meeting, CDOT Project IM 0252-316,  
I-25/Colorado Springs Corridor Environmental Assessment

On September 9, 2003, representatives of the Federal Highway Administration (FHWA) and Colorado Department of Transportation (CDOT) convened a tribal consultation meeting at the CDOT Engineering Residency in Colorado Springs, Colorado for the highway improvement project referenced above. Of the five tribes considered consulting parties for the project under Section 106 of the National Historic Preservation Act, two were represented at the meeting (Kiowa Tribe of Oklahoma and Pawnee Nation of Oklahoma). Due to last-minute personal commitments and other unforeseen circumstances, the members of two additional tribes initially scheduled to attend were absent (Cheyenne and Arapaho Tribes of Oklahoma, Northern Cheyenne Tribe); the remaining consulting tribe (Southern Ute Indian Tribe) did not express an interest in participating in the meeting. The following individuals were present:

<u>Name</u>	<u>Affiliation</u>
Dan Jepson	CDOT Cultural Resources Manager, Tribal Liaison
Dick Annand	CDOT Region 2 Planning and Environmental Manager
Judy DeHaven	CDOT Region 2 Environmental Planner
Charmaine Farrar	FHWA Native American Coordinator
Chris Horn	FHWA Region 2 Operations Engineer
Monica Pavlik	FHWA Environmental Engineer
George Daingkau	Kiowa Tribe of Oklahoma
LaDonna Daingkau	Kiowa Tribe of Oklahoma
Alice Alexander	Pawnee Nation of Oklahoma
Billie Horsechief	Pawnee Nation of Oklahoma

During the initial office portion of the meeting the tribal representatives were provided an overview of proposed improvements to the I-25 study corridor, a 28-mile highway segment that bisects Colorado Springs and adjacent areas north and south of the city. Depending on location, plans call for widening the interstate to either six or eight lanes, as well as the addition of various safety and noise abatement measures throughout the corridor. Improvements will be constructed in phases over the next 10-20 years as funding becomes available. A discussion of known prehistoric archaeological sites in the corridor was also undertaken, focusing on potential impacts to one site considered eligible for listing on the National Register of Historic Places (5EP211). This locality cannot be completely avoided during proposed interchange reconstruction, and as such controlled archaeological excavations are suggested as the most reasonable method to mitigate adverse effects to its integrity. The tribal members asked questions and raised issues about the proposed highway improvements, all of which were addressed to their satisfaction.

Mr. William L. Pedro  
September 17, 2001  
Page 2

At the conclusion of the office meeting the group proceeded in a single vehicle to I-25, where a driving tour of the entire corridor ensued. The purpose of the trip was to provide the tribal representatives an opportunity to view the project area and simultaneously receive information about the nature and extent of proposed improvements, and how future projects may impact the natural and cultural environment. Two stops were made, one at site SEP211, the other at Monument Valley Park, a city recreational facility which contains a spring that FHWA felt might be of interest to the tribes. The tribal members were thus able to personally view SEP211 and discuss the nature and extent of future archaeological work proposed prior to the interchange reconstruction project. The spring in Monument Valley Park did not have any special meaning to the tribal members, as it is a feature of the modern built environment (having been created and "discovered" in the 1880's subsequent to damming of adjacent Monument Creek). No major issues of concern were raised as a result of the driving tour.

FHWA, CDOT and the tribal representatives concurred that a contractual agreement is the most efficient and comprehensive method of formalizing the consultation process for the I-25 Environmental Assessment (EA) and all subsequent construction projects within EA corridor. As such a Programmatic Agreement (PA) addressing all issues pertinent to both the agencies and tribes will be prepared, the final version of which will be circulated for signatures and become part of the EA and subsequent Finding of No Significant Impact (FONSI). (This PA will be similar to the document currently being prepared for the Interstate 70 PEIS project, with which you are familiar, the final draft of which is nearing completion.) I will develop the draft PA in the near future and forward it to you for review and comment. Upon agreement to initiate a PA, the consultation meeting adjourned mid-afternoon.

The meeting was quite productive, as it provided a forum for direct communication between the consulting tribes and agencies. I look forward to a continuing dialogue with the consulting tribes regarding the I-25 Colorado Springs EA. If you have questions about the project in general, the September 9 meeting specifically, or any other issue related to the I-25 Corridor, please contact me by phone at (303)757-9631, or via Email at [daniel.jepson@dot.state.co.us](mailto:daniel.jepson@dot.state.co.us).

Sincerely,



Dan Jepson, Cultural Resources Manager  
Section 106 Tribal Liaison

cc: C. Farrar/C. Horn/M. Pavlik/E. Vinson (FHWA)  
D. Annand/J. DeHaaven (CDOT Region 2)  
A. Garcia (CH2M Hill)  
RF/CF

FEDERAL HIGHWAY ADMINISTRATION/COLORADO DEPARTMENT OF TRANSPORTATION  
SECTION 106 TRIBAL CONSULTATION INTEREST RESPONSE FORM

PROJECT: IM 0252-316, I-25 Corridor Environmental Assessment

The Pawnee Nation of Oklahoma Tribe  (is)  (is not) (circle one) interested in becoming a consulting party for the Colorado Department of Transportation project referenced above, for the purpose of complying with Section 106 of the National Historic Preservation Act and its implementing regulations (36 CFR 800). If your tribe will be a consulting party, please answer the questions below.

Signed: Alice Alexander, THPO  
Name and Title

CONSULTING PARTY STATUS [36 CFR §800.2(c)(3)]

Do you know of any specific sites or places to which your tribe attaches religious and cultural significance that may be affected by this project?

Yes  No If yes, please explain the general nature of these places and how or why they are significant (use additional pages if necessary). Locational information is not required.

*Please see sites listed in letter*

SCOPE OF IDENTIFICATION EFFORTS [36 CFR §800.4(a)(4)]

Do you have information you can provide us that will assist us in identifying sites or places that may be of religious or cultural significance to your tribe?

Yes  No If yes, please explain.

*Please see sites listed in letter*

CONFIDENTIALITY OF INFORMATION [36 CFR §800.11(c)]

Is there any information you have provided here, or may provide in the future, that you wish to remain confidential?

Yes  No  If yes, please explain.

2005 10/2

Please complete and return this form within 30 days of receipt via US Mail or fax to:

FEDERAL HIGHWAY ADMINISTRATION/COLORADO DEPARTMENT OF TRANSPORTATION  
SECTION 106 TRIBAL CONSULTATION INTEREST RESPONSE FORM

PROJECT: IM 0252-316, I-25 Corridor Environmental Assessment

The Southern Ute Indian Tribe  [is] / is not] (circle one) interested in becoming a consulting party for the Colorado Department of Transportation project referenced above, for the purpose of complying with Section 106 of the National Historic Preservation Act and its implementing regulations (36 CFR 800). If your tribe will be a consulting party, please answer the questions below:

Signed: Neil A. Reed - NAGPRA Coord.  
Name and Title

CONSULTING PARTY STATUS [36 CFR §800.2(c)(3)]

Do you know of any specific sites or places to which your tribe attaches religious and cultural significance that may be affected by this project?

Yes  No  If yes, please explain the general nature of these places and how or why they are significant (use additional pages if necessary). Locational information is not required.

SCOPE OF IDENTIFICATION EFFORTS [36 CFR §800.4(a)(4)]

Do you have information you can provide us that will assist us in identifying sites or places that may be of religious or cultural significance to your tribe?

Yes  No  If yes, please explain.

CONFIDENTIALITY OF INFORMATION [36 CFR §800.11(c)]

Is there any information you have provided here, or may provide in the future, that you wish to remain confidential?

Yes  No  If yes, please explain.

Please complete and return this form within 30 days of receipt via US Mail or fax to:

Dan Jepson, Staff Archaeologist  
Colorado Department of Transportation  
Environmental Programs  
4201 E. Arkansas Ave.  
Denver, CO 80222  
FAX: (303)757-9445

FEDERAL HIGHWAY ADMINISTRATION/COLORADO DEPARTMENT OF TRANSPORTATION  
SECTION 106 TRIBAL CONSULTATION INTEREST RESPONSE FORM

PROJECT: IM 0252-316, I-25 Corridor Environmental Assessment

The Cherokee & Hopaho Tribes of OKla Tribe  is  is not] (circle one) interested in becoming a consulting party for the Colorado Department of Transportation project referenced above, for the purpose of complying with Section 106 of the National Historic Preservation Act and its implementing regulations (36 CFR 800). If your tribe will be a consulting party, please answer the questions below.

Signed: William L. Peltz

NAGPRA, NHPA +  
Name and Title Sand Creek Rep.

CONSULTING PARTY STATUS [36 CFR §800.2(c)(3)]

Do you know of any specific sites or places to which your tribe attaches religious and cultural significance that may be affected by this project?

Yes

No

If yes, please explain the general nature of these places and how or why they are significant (use additional pages if necessary). Locational information is not required.

SCOPE OF IDENTIFICATION EFFORTS [36 CFR §800.4(a)(4)]

Do you have information you can provide us that will assist us in identifying sites or places that may be of religious or cultural significance to your tribe?

Yes

No

If yes, please explain.

CONFIDENTIALITY OF INFORMATION [36 CFR §800.11(c)]

Is there any information you have provided here, or may provide in the future, that you wish to remain confidential?

Yes

No

If yes, please explain.

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FEDERAL HIGHWAY ADMINISTRATION/COLORADO DEPARTMENT OF TRANSPORTATION  
SECTION 106 TRIBAL CONSULTATION INTEREST RESPONSE FORM

PROJECT: IM 0252-316, I-25 Corridor Environmental Assessment

The Kiowa Tribe of Okla Tribe (is) (is not) (circle one) interested in becoming a consulting party for the Colorado Department of Transportation project referenced above, for the purpose of complying with Section 106 of the National Historic Preservation Act and its implementing regulations (36 CFR 800). If your tribe will be a consulting party, please answer the questions below.

Signed: Ken Dejeu

Name and Title

NASPR/Cultural Resource Person & Representative

CONSULTING PARTY STATUS [36 CFR §800.2(c)(3)]

Do you know of any specific sites or places to which your tribe attaches religious and cultural significance that may be affected by this project?

Yes

No

If yes, please explain the general nature of these places and how or why they are significant (use additional pages if necessary). Locational information is not required.

SCOPE OF IDENTIFICATION EFFORTS [36 CFR §800.4(a)(4)]

Do you have information you can provide us that will assist us in identifying sites or places that may be of religious or cultural significance to your tribe?

Yes

No

If yes, please explain.

CONFIDENTIALITY OF INFORMATION [36 CFR §800.11(c)]

Is there any information you have provided here, or may provide in the future, that you wish to remain confidential?

Yes

No

If yes, please explain.

Please complete and return this form within 30 days of receipt via US Mail or fax to

Dan Jepson, Staff Archaeologist  
Colorado Department of Transportation  
Environmental Programs  
4201 E. Arkansas Ave.  
Denver, CO 80222  
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FEDERAL HIGHWAY ADMINISTRATION/COLORADO DEPARTMENT OF TRANSPORTATION  
SECTION 106 TRIBAL CONSULTATION INTEREST RESPONSE FORM

PROJECT: IM 0252-316, I-25 Corridor Environmental Assessment

The Northern Cheyenne Tribe  (is / is not) (circle one) interested in becoming a consulting party for the Colorado Department of Transportation project referenced above, for the purpose of complying with Section 106 of the National Historic Preservation Act and its implementing regulations (36 CFR 800). If your tribe will be a consulting party, please answer the questions below.

Signed: Robert Brady Sr. U.C. THLD.  
Name and Title

CONSULTING PARTY STATUS [36 CFR §800.2(c)(3)]

Do you know of any specific sites or places to which your tribe attaches religious and cultural significance that may be affected by this project?

Yes  No If yes, please explain the general nature of these places and how or why they are significant (use additional pages if necessary). Locational information is not required.

*all sites found in the state could be of religious & cultural significant to the Northern Cheyenne as we were once very native to the area. - we would have to physically visit the areas to determine it's historical significance to the tribe*

SCOPE OF IDENTIFICATION EFFORTS [36 CFR §800.4(a)(4)]

Do you have information you can provide us that will assist us in identifying sites or places that may be of religious or cultural significance to your tribe?

Yes  No If yes, please explain. *as explained above, we would have to see the sites, so we could determine if the sites or areas have any ~~own~~ cultural significance*

CONFIDENTIALITY OF INFORMATION [36 CFR §800.11(c)]

Is there any information you have provided here, or may provide in the future, that you wish to remain confidential?

Yes  No If yes, please explain. *any information, we a guess would be considered confidential unless determine otherwise by our elders.*

Please complete and return this form within 30 days of receipt via US Mail or fax to:

Dan Jepson, Staff Archaeologist  
Colorado Department of Transportation  
Environmental Programs  
4201 E. Arkansas Ave.  
Denver, CO 80222  
FAX: (303)757-9445





U.S. Department  
Of Transportation  
Federal Highway  
Administration

**CDOT**

OCT 31 2001

**REGION 2  
NORTH PROGRAM**

Colorado Federal Aid Division  
555 Zang Street, Room 250  
Lakewood, CO 80228-1040

October 23, 2001

Colonel Scott Borges  
10 CEG/CC  
8120 Edgerton Drive, Ste 40  
USAF Academy, CO 80840-2400

Dear Colonel Borges:

Subject: I-25 Corridor EA Cooperating  
Agency Agreement

The Federal Highway Administration (FHWA), in cooperation with the Colorado Department of Transportation (CDOT) Region 2, is initiating an Environmental Assessment (EA) for the I-25 Corridor project to improve north south mobility through Colorado Springs, Colorado, extending from the I-25 Monument interchange to north of the interchange at I-25 and SH 16. The FHWA, as the lead federal agency, is formally requesting you to be a cooperating agency. This request will formalize your agency's ongoing participation in the project.

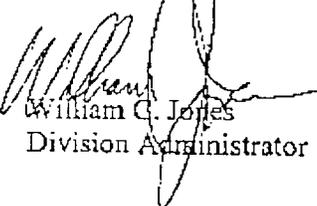
The EA will be utilized to determine the appropriate environmental document required. If no significant impacts are found, a subsequent Finding of No Significant Impact (FONSI) will be issued as our decision-making document. If during the EA process any impact is found to be significant, we will move forward with a Notice of Intent (NOI) and an Environmental Impact Statement (EIS) where a subsequent Record of Decision (ROD) will be our decision-making document.

We expect that, at the end of the environmental process, your NEPA requirements also will be satisfied. You have the right to expect that the EA will enable you to discharge your jurisdictional responsibilities. Likewise, you have the obligation to tell us if, at any point in the process, your needs are not being met. Absent any expressed dissent from your office during the NEPA process, the preferred alternative and its mitigation measures will be considered acceptable for approval by FHWA.

We look forward to your response to this request and your role as a cooperating agency on this project. For your use, enclosed is a copy of the FHWA document entitled "Guidance on Cooperating Agencies."

If you have any questions with regard to this request, please contact Mr. Chris Horn at (303) 969-6730, ext. 383.

Sincerely yours,



William C. Jones  
Division Administrator

Enclosure

cc: Mr. Robert Torres, CDOT Region 2 RTD ✓  
Mr. David Poling, CDOT Region 2 RPE ✓  
Mr. Dick Annand, CDOT Region 2 RPEM  
Ms. Rebecca Vickers, CDOT EP  
Ms. Charmaine Farrar, FHWA  
Ms. Edrie Vinson, FHWA  
Mr. Chris Horn, FHWA  
Mr. Steve Deppmeier, FHWA  
Reader File



DEPARTMENT OF THE AIR FORCE

10TH CIVIL ENGINEER GROUP

USAF ACADEMY COLORADO

16 JAN 2002

Colonel Scott K. Borges  
Commander  
8120 Edgerton Drive, Suite 40  
USAF Academy CO 80840-2400

Mr. Chris Horn  
Federal Highway Administration  
555 Zang Street, Room 250  
Lakewood CO 80228

Mr. Dave Poling  
Colorado Department of Transportation  
16 E. Arvada  
Colorado Springs CO 80906-1434

Dear Mr. Horn and Mr. Poling

The Colorado Department of Transportation and the Federal Highway Administration have invited the USAF Academy to be a Cooperating Agency on the I-25 El Paso County Environmental Assessment. The Academy accepts the role of Cooperating Agency on this project and, as such, would like to be invited to all agency coordination and public involvement meetings, and be involved in NEPA document reviews. This will ensure effective coordination, avoid adverse impacts to the Academy and assist in developing practical mitigation solutions.

The Academy recognizes the need for roadway development along the I-25 corridor, and it is our intent to support this effort in a manner that benefits the public and promotes the integrity of the Academy as a National Historic Landmark. Please feel free to contact Dr. Brian Muhlbaehler, (719) 333-3308, for information and input as necessary.

Sincerely



SCOTT K. BORGES, Colonel, USAF

