

# US 6 Bridges Design Build Project

BR 0061-083

Sub Account Number 18838 (CN)

## Cultural Resources Technical Report

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Federal Highway Administration

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## **Attachments**

- 1: Cultural Resources Inventory Report for the US 6 Bridges Reconstruction Project*
- 2-8: Correspondence Letters and Draft MOA*

## List of Abbreviated Terms

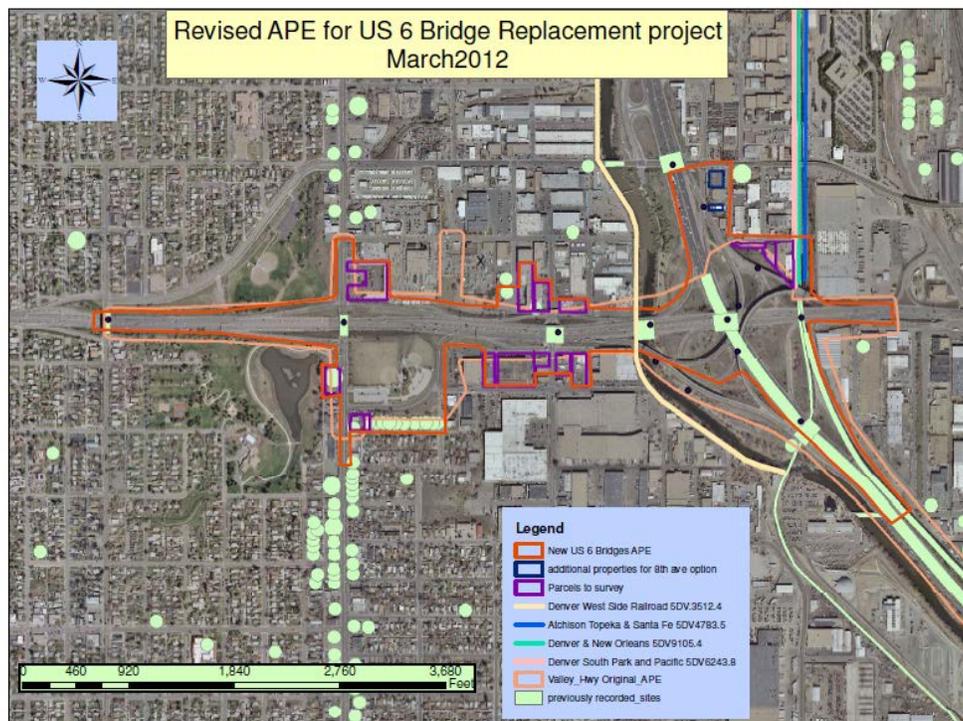
ADA	Americans with Disabilities Act
AM	morning
APCD	CDPHE Air Pollution Control Division
BMP	best management practice
CCD	City and County of Denver
CDOT	Colorado Department of Transportation
CDPHE	Colorado Department of Public Health and Environment
CDPS	Colorado Discharge Permit System
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CHS	Colorado Historical Society
CML	Consolidated Main Line railroad
CO	carbon monoxide
DRCOG	Denver Regional Council of Governments
EB	eastbound
EIS	Environmental Impact Statement
EPA	US Environmental Protection Agency
FHWA	Federal Highway Administration
I-25	Interstate 25
IGA	intergovernmental agreement
ITS	intelligent transportation system
$L_{eq}$	equivalent sound level
LOS	level-of-service
LOSS	level-of-service of safety
MS4	municipal separate storm sewer system
NAAQS	National Ambient Air Quality Standard
NAC	Noise Abatement Criteria
NB	northbound
NEPA	National Environmental Policy Act
NRHP	National Register of Historic Places
PM	afternoon/evening
PM <sub>10</sub>	particulate matter less than 10 microns in size
PUC	Public Utilities Commission
RCRA	Resource Conservation and Recovery Act
ROD	Record of Decision
RTD	Regional Transportation District
RTP	Regional Transportation Plan
SB	southbound
SHPO	State Historic Preservation Officer
TIP	Transportation Improvement Program
T-REX	Transportation Expansion Project
TNM <sup>®</sup>	FHWA's Traffic Noise Model
US 6	6 <sup>th</sup> Avenue
USACE	US Army Corps of Engineers
USC	US Code

USDOJ  
USFWS  
WB

US Department of Interior  
US Department of Interior Fish and Wildlife Service  
westbound

## Executive Summary

For the Proposed Project, a new Area of Potential Effect (APE) was developed in coordination with the State Historic Preservation Officer (SHPO) and revised as the project limits were further defined. This APE, shown in Figure E-1, was modified to account for the specific project elements and construction footprint needed for the improvements. There have been no regulatory changes to the Section 106 process between the FEIS, 2007 ROD, and this 2012 reevaluation.



**Figure E-1: Revised APE for Proposed Project**

CDOT sent three letters to SHPO describing the Area of Potential Effect (APE), potentially historic properties, and effects to properties that were determined to be eligible for or listed on the National Register of Historic Places. The first letter was sent on April 10, 2012 addressing the boundaries of the APE (*Attachment 2*). The second letter from CDOT to SHPO was sent on June 22, 2012 addressing Section 106 determinations of eligibility for potentially historic structures and resources in the APE (*Attachment 3*). The third letter from CDOT to SHPO was sent on August 2, 2012 discussed effects and impacts to historic resources within the APE from the highway project (*attachment 4*). SHPO responded on April 18, 2012 (*attachment 5*) stating a finding of concurrence with CDOT's definition of the projects APE. The second letter from SHPO to CDOT was sent on June 29, 2012 (*attachment 6*) stating a finding of concurrence with CDOT's findings of eligibility. On August 23, 2012 SHPO responded to CDOT stating a finding of concurrence regarding the study's effects and impacts findings (*attachment 7*).

The Proposed Project would adversely affect one resource determined to be eligible for listing in the National Register of Historic Places. A portion of historically significant brick-lined sewer would be impacted by modifications to the bridge that carries US 6 over the South Platte River. A 240-foot segment of the sewer would be removed and replaced by concrete piping. This sewer segment composes a small portion (0.10 percent) of a seven mile stretch of historically significant functioning brick sewer. CDOT has determined, and SHPO concurred, that the removal of this segment can be considered an *adverse effect*. CDOT, FHWA, and SHPO are developing a Section 106 Memorandum of Agreement (MOA) which would mitigate adverse effects on the brick sewer. The first steps of this MOA have begun with the agencies reviewing a draft, and with the completion of a report on the history of Denver's brick sewers. Mitigation for this resource will be handled through this separate MOA. A draft form of this MOA can be found in attachment 8.

The Proposed US 6 Bridge Project is design/build, and any additional changes proposed by the awarded contractor that weren't previously cleared as part of the Section 106 consultation and Technical Report for Cultural Resources that include new rights of way acquisitions, utility relocates or easements affecting potentially historic properties or linear resources shall be evaluated. The contractor shall submit changes to CDOT and re-open consultation with SHPO under Section 106, and under Section 4(f), if required by a change to the project area of effect or project impacts. The selected contractor is required to provide a historic professional who meets the Secretary of Interior's qualification standards and who shall provide CDOT with the necessary resources to consult with SHPO. Impacts to historical resources shall not be completed until the 106 consultation process is complete.

## **Project Background**

The Proposed Project includes modifications to the roadway, interchanges, and bridges along 6<sup>th</sup> Avenue (US 6) between Sheridan Boulevard and the BNSF Railway in Denver, Colorado. The Colorado Department of Transportation (CDOT) is preparing a Reevaluation and Record of Decision (ROD) to document the impacts of and mitigation for the Proposed Project.

## **The Valley Highway Project**

The Federal Highway Administration (FHWA) and CDOT prepared a Final Environmental Impact Statement (FEIS) in 2006 and a ROD in 2007 for the Interstate 25 (I-25) Valley Highway Project, located in Denver, Colorado. The Valley Highway Project includes the reconstruction of I-25 and reconfiguration of interchanges from Logan Street to United States Highway (US) 6, US 6 from I-25 to Federal Boulevard, and the crossing of Santa Fe Drive and Kalamath Street at the Consolidated Main Line railroad. The Preferred Alternative, as described in the FEIS, includes the following elements:

- I-25 Mainline: Widening of I-25 to provide a consistent section with four through lanes plus auxiliary lanes in each direction throughout the project area
- I-25/Broadway: Tight diamond interchange
- I-25/Santa Fe Drive: Single point urban interchange with a flyover ramp for northbound Santa Fe Drive to northbound I-25
- I-25/Alameda/Santa Fe/Kalamath: Offset partial urban interchange at I-25 and Alameda Avenue; Santa Fe Drive and Kalamath Street grade separated under the railroad close to their current alignments
- US 6: Ramp improvements at the I-25/US 6 interchange; closure of the Bryant Street interchange; diamond interchange at US 6/Federal Boulevard with slip ramps to Bryant Street and a braided ramp from Federal Boulevard to eastbound US 6; reconstruction of US 6 with collector-distributor roads/auxiliary lanes throughout the project area

The Preferred Alternative of the Valley Highway Project is shown in Figure 1.



Figure 2: I-25 Valley Highway Project Preferred Alternative

## US 6 Bridges Design Build Project

The Proposed Project includes the reconstruction of US 6, reconfiguration of interchanges from Federal Boulevard to I-25, and replacement of the US 6 bridges from Federal Boulevard to the bridge over the BNSF Railway. More specifically, the Proposed Project includes the following elements:

- The replacement of five bridges along US 6: Federal Boulevard, Bryant Street, South Platte River, I-25, and BNSF Railway. Three of these bridges are in poor condition and the other two are functionally obsolete. The project would also add a tunnel immediately east of I-25 under US 6 to separate traffic on northbound I-25 from traffic exiting the interstate to travel east and west on US 6.
- Ramp improvements at the I-25/US 6 interchange, closure of the westbound (WB) US 6 to Bryant Street ramp, a diamond interchange at US 6/Federal Boulevard with slip ramps to Bryant Street, and a braided ramp from Federal Boulevard to eastbound (EB) US 6.
- Reconstruction of US 6 with collector-distributor roads/auxiliary lanes from Federal Boulevard to the BNSF Railway bridge structure
- Conversion of 5<sup>th</sup> Avenue to two-way traffic from Federal Boulevard to Decatur Street
- Widening of Federal Boulevard, from five to six lanes, from 5<sup>th</sup> to 7<sup>th</sup> Avenues to accommodate current and future improvements
- Pavement resurfacing of US 6 from Knox Boulevard to Sheridan Boulevard
- In-kind replacement of impacted facilities for Barnum East Park
- A bicycle/pedestrian bridge structure over US 6, connecting Barnum North Park and Barnum Park (also known as Barnum Park South, and herein referred to as Barnum Park South)
- Upgrading portions of the South Platte River Trail to current standards

Figure 2 shows the Proposed Project.

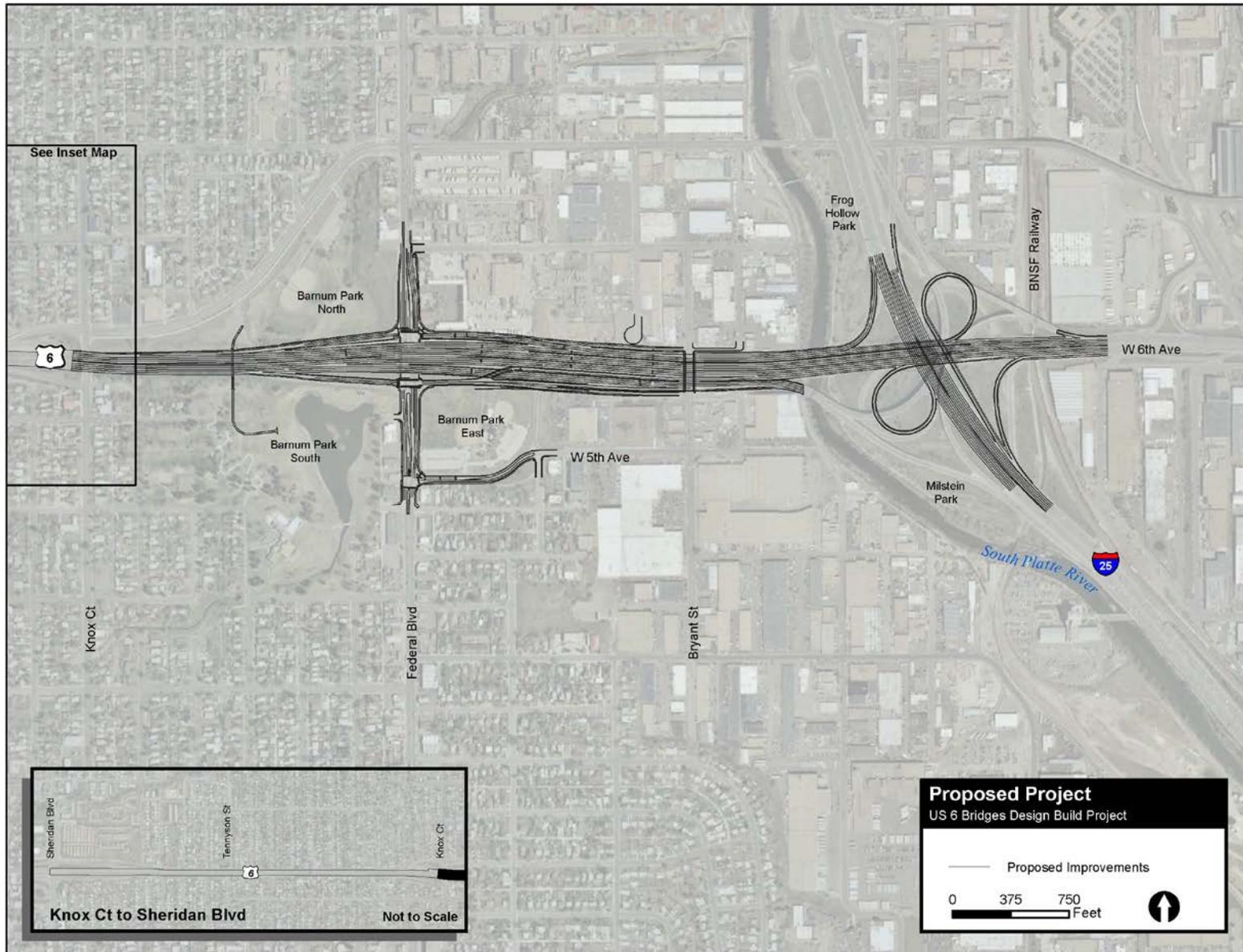


Figure 3: Proposed Project

## **Relationship of the Valley Highway Project and the US 6 Bridges Design Build Project**

At the time of the FEIS, funding had not been identified for the entire Preferred Alternative. Although budget placeholders were included in the 2030 Regional Transportation Plan (RTP), these budgets fell short of the estimated cost of the Preferred Alternative. Therefore, FHWA and CDOT planned for a phased implementation of the Preferred Alternative. These six phases are outlined in Chapter 7 of the FEIS. The Reevaluation and ROD for the Proposed Project will reevaluate part of Phase 1 (the part including the US 6/Federal Boulevard interchange) as presented in the 2007 ROD, and provide a decision for Phase 5 of the Valley Highway Project. The Reevaluation and ROD for the Proposed Project will also address six new project elements, which were not part of the FEIS. Due to the minor environmental significance and nature of these additional components, they are included in the Reevaluation and ROD and will not affect the independent utility, logical termini, or Preferred Alternative of the Valley Highway Project.

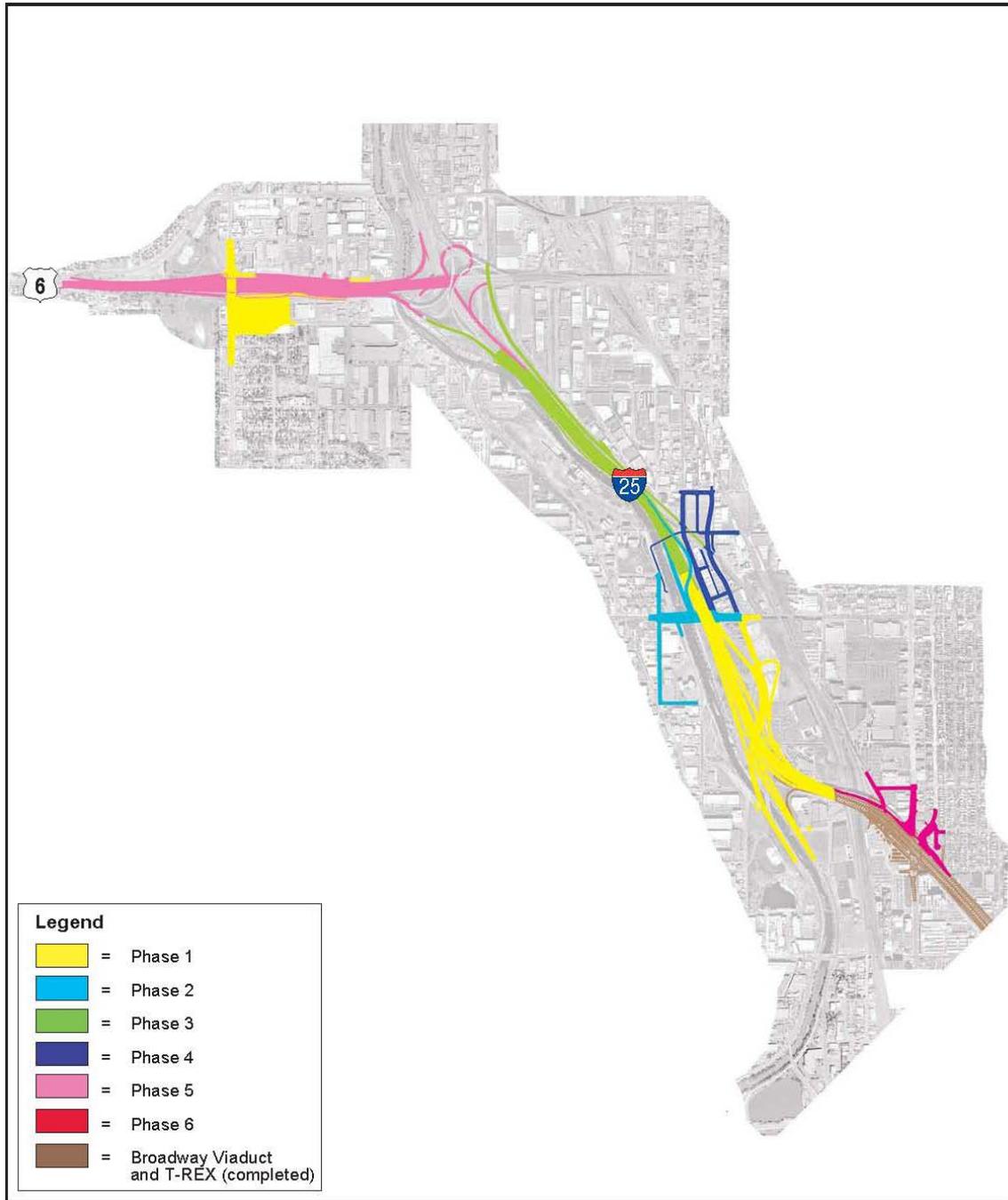
### ***Phasing of the FEIS Preferred Alternative***

The Proposed Project includes elements of two of the six construction phases—Phase 1 and Phase 5—from the Valley Highway Project. A decision on construction Phase 1 of the Valley Highway Project, which included the US 6/Federal Boulevard bridge and ramps, excluding the braided ramp, was made in the 2007 ROD. Figure 3 shows the phases of the Valley Highway Project’s Preferred Alternative and Figure 4 shows the Proposed Project Elements and how they relate to the FEIS phasing.

### ***Additional Project Elements in the Proposed Project***

At this time, the Proposed Project includes six additional elements that were not included in the FEIS or 2007 ROD:

- Reconstruction of the southbound (SB) I-25 to EB US 6 ramp;
- A bicycle/pedestrian bridge structure over US 6, connecting Barnum North and Barnum South parks;
- Replacement of the US 6 bridge over Bryant Street;
- Replacement of the US 6 bridge over I-25;
- Replacement of the US 6 bridge over the BNSF Railway; and
- Pavement resurfacing of US 6 between Sheridan Boulevard and Knox Court



**Figure 4: Valley Highway EIS Phased Implementation of the Preferred Alternative**

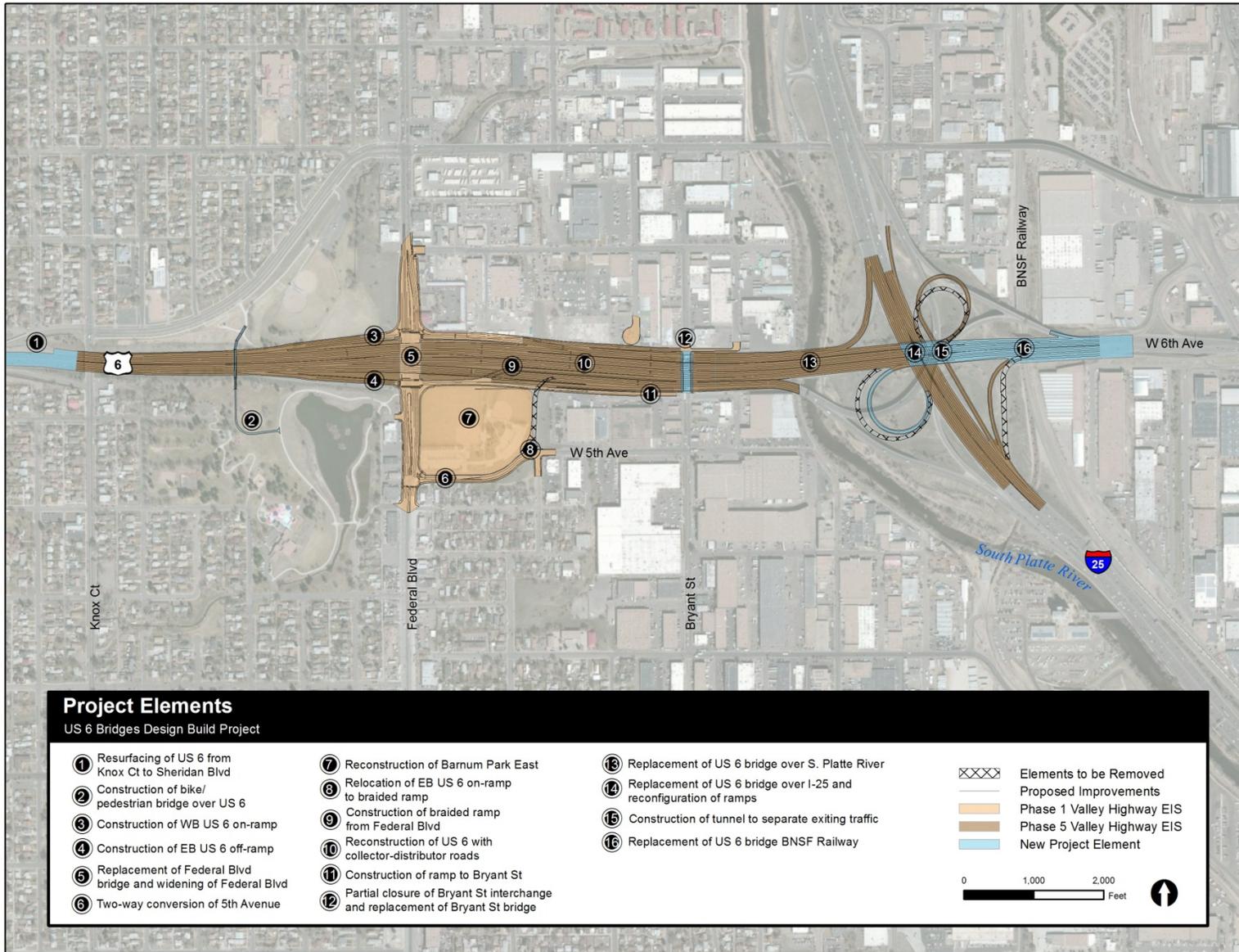


Figure 5: Proposed Project Elements

# **Attachment 1**

Cultural Resources Inventory Report of the US 6 Bridges Reconstruction Project

**CULTURAL RESOURCES INVENTORY REPORT  
FOR THE  
US 6 BRIDGES RECONSTRUCTION PROJECT,  
PHASES 1 AND 5 OF THE VALLEY HIGHWAY  
ENVIRONMENTAL IMPACT STATEMENT  
DENVER, COLORADO**

Prepared for:

Federal Highway Administration  
Colorado Department of Transportation

Prepared by:

Felsburg Holt & Ullevig

**June 22, 2012**

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## **ABSTRACT**

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Cultural resource investigations were conducted by CDOT and historic preservation consultants from March through May 2012 for the proposed US-6 Bridge Reconstruction Project in the City and County of Denver. On behalf of the Federal Highway Administration (FHWA), the Colorado Department of Transportation (CDOT) is requesting comments from the State Historic Preservation Officer (SHPO) for eligibility determinations for historic properties within the Area of Potential Effect (APE) for improvements to US-6 (6<sup>th</sup> Avenue Freeway), part of the Valley Highway Environmental Impact Statement (EIS) (March 2004) and phased Record of Decision (ROD) (July 2007). This project will provide some of the improvements outlined in the 2007 ROD, and will also incorporate some items that were identified in the 2004 EIS but not included in the 2007 ROD; this will require that a new phased ROD be developed and signed. As part of that process CDOT re-evaluated several resources that were previously recorded and also conducted an intensive survey to record additional historic properties.

The project involved a Class I file search, several reconnaissance surveys of the proposed Area of Potential Effects (APE) and a Class III intensive-level inventory of historical resources.

A file search revealed that the APE contains 19 previously recorded architectural properties. Jake Lloyd of Felsburg, Holt & Ullevig, Dianna Litvak of CDOT, and Jason Marmor, independent historical consultant, completed intensive-level documentation for 23 previously unrecorded historical resources including 17 historic buildings and six historic linear transportation features. This includes one brick-lined sanitary sewer, the West and Southside Interceptor, which was surveyed by Gail Keeley, Hermsen Consultants, for a study of Denver's brick-lined sewer systems. In addition, re-evaluations were completed for five previously recorded sites including four architectural properties and one historic bridge structure.

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## **1.0 INTRODUCTION**

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In early 2012, a blended team consisting of Jake Lloyd of Felsburg Holt & Ullevig (FHU), Dianna Litvak of CDOT Region 6 and cultural resource specialist Jason Marmor, completed an intensive-level (Class III) cultural resource survey of the Area of Potential Effect (APE), outlined in Section 2.2. The APE encompasses proposed improvements to bridge structures along US-6 at Federal Boulevard, Bryant Street, the South Platte River and I-25 in Denver and are referred to herein as the US-6 Bridge Reconstruction Project. The inventory was conducted on behalf of the Colorado Department of Transportation (CDOT).

Improvements outlined in the US-6 Bridge Reconstruction Project were originally identified in the Valley Highway EIS of 2004. CDOT has recognized these specific bridge improvements to US-6 as one phase of the Valley Highway EIS. The US-6 Bridge Reconstruction Project requires approval from the Federal Highway Administration (FHWA), and therefore qualifies as a federal undertaking requiring compliance with Section 106 of the National Historic Preservation Act (as amended), and associated regulations published in 36 CFR Part 800 (revised January, 2001). This report addresses properties that reached the 50-year age requirement in the years after the EIS and ROD, and it also re-evaluates historic properties initially surveyed for previous surveys.

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## 2.0 PROJECT AREA

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### 2.1 Environmental Setting

The project area encompasses a portion of US-6 in Denver, extending from Knox Street on the west end, to I-25 on the east. This portion of US-6 crosses the South Platte River, which flows in a northerly direction through the Denver area. The project area mostly lies within the South Platte River valley, but also includes higher terrain on the western edge of the project area. Elevations in the project area range from a high of approximately 5,400 ft at Knox Street on the west end, to a low of 5,200 ft in the valley floor east of the river, at I-25 and US-6.

The project area is situated in the Great Plains physiographic province, and comprises a portion of the South Platte River drainage. A tributary of the Missouri River, the South Platte River is a major regional watercourse with headwaters in Douglas County; it drains a considerable area of foothills and plains in east-central and northeastern Colorado. The river's flow is now regulated by Chatfield Dam and Lake. In the project area, the South Platte River occupies its historic channel. The river has created a riparian corridor lined with deciduous trees.

The natural landscape of the project area has been almost completely obscured by historical and modern development. I-25 is the dominant manmade feature in the project area, especially at the US-6 interchange. Several railroads also parallel I-25, mostly along the east side of the South Platte River valley. City streets to the north and south of US-6 establish connections to commercial, residential, and industrial areas throughout southwest Denver. Development along US-6 consists almost entirely of light industrial and warehouse facilities.

Other significant manmade features in the project area include five public parks. These parks include Barnum Park, Barnum East Park, Barnum North Park, Milstein Park and Frog Hollow Park, the latter two located along the east bank of the South Platte River.

## 2.2 *Area of Potential Effect*

An Area of Potential Effect (APE) was delineated to encompass all properties potentially subject to impacts from the US-6 Bridge Reconstruction Project. The APE (see **Figure 1**) is based upon the maximum perimeter surrounding all construction improvements outlined in the project. All properties meeting the minimum age requirement (45 years) located within, or transected by, the APE line have been evaluated in this cultural resources report. CDOT submitted the Area of Potential Effects to SHPO for comments in correspondence dated April 10, 2012. SHPO did not object to the APE boundary in correspondence to CDOT dated April 18, 2012.

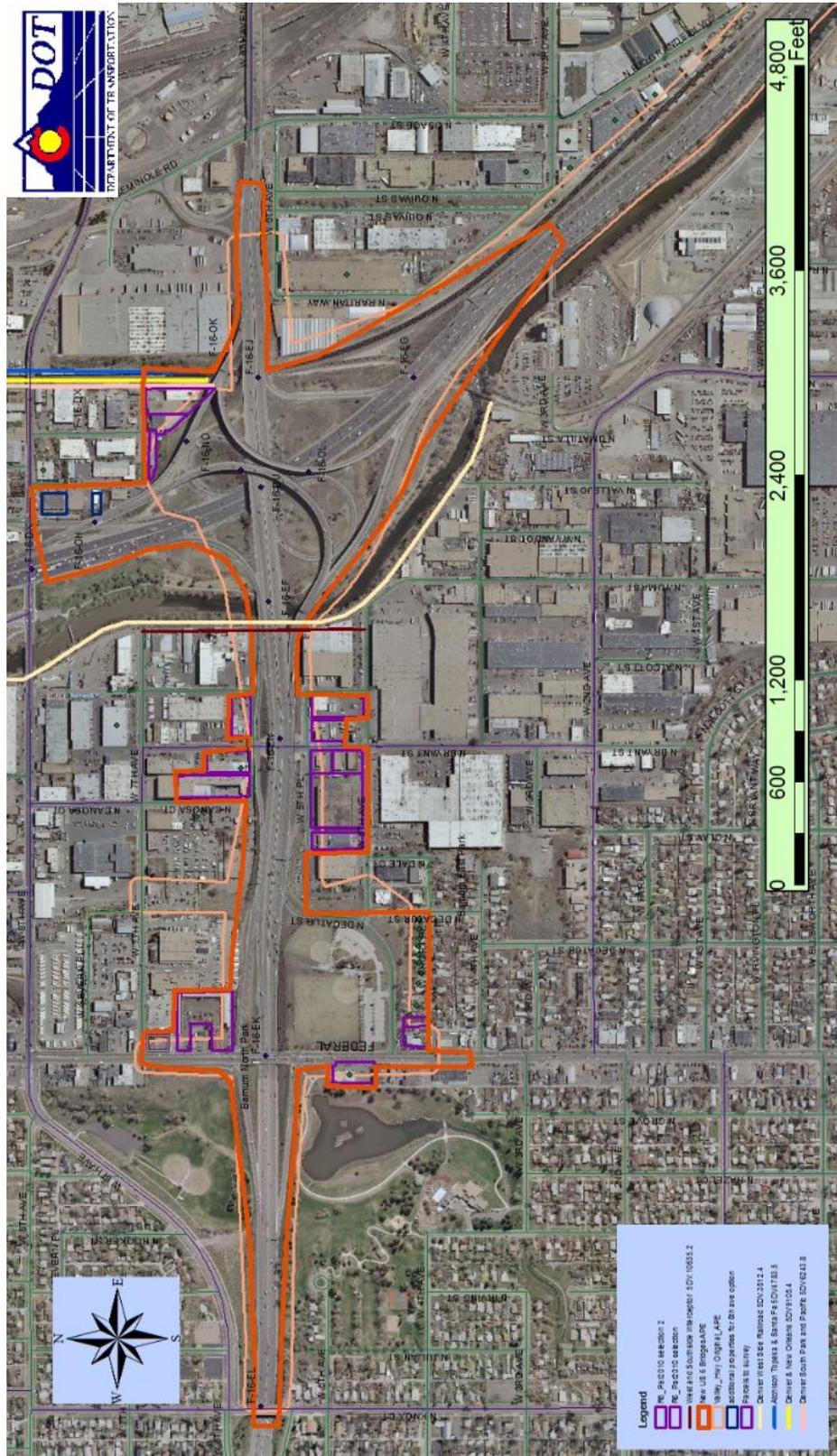


Figure 2 The Area of Potential Effect (APE): US-6 Bridge Reconstruction Project

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## 3.0 HISTORIC CONTEXT

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This segment of US-6 runs through an area of southwest Denver that was originally characterized on the west side by high banks that descended down to a lush riparian valley along the South Platte River to the east. Land along the South Platte River was considered productive agricultural land which may have led to its slow initial development. In 1965, the South Platte River valley experienced severe flooding which caused major damage and loss of property throughout the valley. Along US-6, this consisted mainly of the low lying neighborhoods within Valverde, Sun Valley and La Alma/Lincoln Park. When the land was redeveloped, the neighborhoods changed from low-density residential neighborhoods to mainly industrial and warehouse facilities.

The US-6 Bridge Reconstruction Project occurs within the larger area of study outlined by the Valley Highway EIS of 2004. Several historic sites were previously documented within the APE and additional information pertaining to the historic context of this area along US-6 can be found in the Cultural Resources Inventory of the Valley Highway EIS (2004). Excerpts from other previous studies involving the history and origin of US-6 comprise the majority of the information that is presented throughout this section.

### 3.1 *Neighborhoods of the US-6 Project Area*

#### **Sun Valley Neighborhood:**

The neighborhood of Sun Valley originated as an area utilized for agricultural crop production for the City of Denver in the 1860's and 1870's due to its proximity to the South Platte River. In the 1880's and 1890's when the need for housing increased, this area was platted and developed into single family homes. It remained this way for the most part until the flood of 1965 which destroyed the majority of the buildings in the area. This in conjunction with the construction of US-6 and I-25 in the 1940's and 1950's respectively, led to an industrial and commercial redevelopment pattern in Sun Valley from the 1950's to the present. Manufacturers and other businesses relocating to this area found that the highway improvements made it easy to access other parts of town.

#### **La Alma/Lincoln Park:**

La Alma/Lincoln Park and Baker are among the City's oldest neighborhoods. La Alma/Lincoln Park dates from the settlement of Auraria City, where the Auraria Higher Education Center is presently located. What is known today as La Alma/Lincoln Park neighborhood was annexed to Auraria City (the area of the Original Congressional Grant) under the Territorial Session Laws of 1874 and 1883. Ninety-three percent of the residential blocks were half or more developed before 1900, and the remaining 7 percent developed between 1900 and 1914. Although most of the original structures were lost to floods along Cherry Creek, the neighborhood's character today is still shaped by the age of its homes. Many were built over 100 years ago.

Twenty structures within the neighborhood are listed in the Denver Inventory as having architectural or historical significance. Additionally, the neighborhood has a residential district on the National Register of Historic Places. That district, located on Kalamath, Lipan, and Mariposa streets between West 13th Avenue and Colfax Avenue, is an example of early Denver's working class neighborhoods. La Alma/Lincoln Park also has one locally designated

landmark, the Buckhorn Exchange Restaurant at 1000 Osage Street. This Victorian commercial structure was built in 1885.

As Denver developed in the late 1880s, most construction projects focused on building homes and businesses. Prior to 1900, only a few sporadic attempts had been made to develop a park system for the growing city. A notable exception to this was the 15 acre site at West 11th Avenue and Mariposa Street which the city purchased in 1885 and named "Lincoln Park". Today, Lincoln Park serves as the focal point of the neighborhood. It is the site of the La Alma Recreation Center and numerous Mexican-American celebrations and festivities. "La Alma", a Spanish word for "spirit" or "soul," has been joined to the neighborhood's traditional name, so that today it is commonly called "La Alma/Lincoln Park."

#### **Fletcher's West Side Subdivision:**

Located in the southwest corner of Lincoln Park, this area just east of the South Platte River began as a low density residential neighborhood, but has changed over time. When the South Platte River flooded in 1965, it destroyed the majority of homes and buildings in this low lying area along the river. This in conjunction with the construction of US-6 and I-25 in the 1940's and 1950's respectively, led to an industrial and commercial redevelopment pattern in Fletcher's West Side Subdivision from the 1950's to the present. Manufacturers and other businesses relocated to this area, finding that the highway improvements made it easy to access other parts of town.

#### **The Valverde Neighborhood:**

In Spanish, the name Valverde means "green valley," a term that does not appropriately describe the area today. However in the 1860s, as Denver was becoming populated with pioneers, the open fields southwest of town across the South Platte River appeared more verdant and pastoral than they do today. The area now known as Valverde was first purchased in the 1860s by the Villa Park Association as part of a larger holding of acreage in the area. The property was then transferred to showman and real estate investor P. T. Barnum in the 1870s. Barnum, however, focused his energies upon developing the higher elevations of the property to the west and northwest of Federal Blvd. The entire area east of Federal Blvd. and the lowlands along the Platte River were left to agricultural crop production for many years.

By 1884, Barnum had turned his real estate holdings over to his daughter Helen Buchtel and her husband William. Over the following years, the Buchtels sold individual residential and commercial lots west of Federal Blvd. in the Barnum neighborhood to interested buyers. East of Federal Blvd., the land appears to have been offered to real estate investors and developers, among them friends and associates of the Buchtels. While the low-lying expanse just west of the Platte River was occupied by truck farms that supplied the region with produce, the bluffs above that are adjacent to Federal Blvd. began to be developed into numerous small affordable housing subdivisions geared toward the purchasing ability of working-class families. This included the following subdivision called Burns Boulevard Addition:

#### **Burns Boulevard Addition:**

This area is bordered by 5<sup>th</sup> Ave. on the north and 4<sup>th</sup> Ave. on the south, and by Dale Ct. on the east and Federal Blvd. on the west. The narrow rectangular four-block area was first platted as Fletcher's West Side Subdivision in 1905 and was re-platted in 1913 as the River View Addition. It appears that few, if any, houses were built on these lots during this period. In 1922 the land was finally re-platted as the Burns Boulevard Addition and many of the houses in this area

appear to date from shortly after this time. Developer D. C. Burns, a good friend of Helen Buchtel's, was the real estate agent who had helped her sell off lots in the area.

### 3.2 Early History of US-6 and Federal

Sections of historic contexts that have been previously prepared for projects either nearby or within the current APE have been copied and inserted into this report.

**FROM: Historic Resources Survey, US 6 and Wadsworth Boulevard, Lakewood, CO Draft Report, June 2008, pages 36-37, Associated Cultural Resource Experts**

US-6 was once considered the longest US Highway, extending 3,517 miles coast to coast from Long Beach, California to Provincetown on Cape Cod, Massachusetts. Today it remains the second longest, 116 miles shorter than US 20. In 1926, US Highway 6 terminated in Denver, Colorado. In 1938 it was extended west to the Los Angeles area, where it was co-signed with US 395 to Bishop, California. For over a century, US 6 has been a major route from Denver west to the suburbs of Lakewood and beyond. US 6 grew from a ranch road (the Cold Springs Ranch Road to Denver and Golden) to the first area freeway, which was originally created to expedite transportation of supplies and materials during World War II to the Denver Ordinance Plant located at the present-day Denver Federal Center (Denver Regional Transportation District, 2003: 3-51). The DOP, known locally as the Remington Arms Plant, was initially bordered on the north by a two-lane, graveled US 6.

US 6 was designated as the "state's main east-and-west military road" in 1941, and in 1942 US 6 was expanded to a paved, 4-lane "super-highway," or expressway, between Knox Court and present-day Kipling Avenue (*The Denver Post*, 1948). The freeway's eastern access was roughly Grant Street and Cherry Creek in Denver by 1952, while the western end extended to US Highway 40 near Golden. The route functioned as a divided highway with at-grade, signaled intersections. Nationwide, US 6 was officially dedicated as the Grand Army of the Republic Highway on May 3, 1954 (though the Colorado Legislature had designated the highway as such 16 years earlier). Locally, ceremonies were held near the Simms Street/Union Boulevard intersection (*The Denver Post*, 1953). In the late 1950s and early 1960s, the signaled intersections were replaced by a series of grade-separated interchanges, over- and underpasses, freeway extensions, and frontage roads in an attempt to improve east-west traffic flow along US 6. In 1957, the northern leg of the US 6 Viaduct was constructed at Kalamath Street and 8th Avenue. In November of that same year, the Knox Court separation road and North/South US 6 underpass structure, a Concrete Slab and Girder bridge (CSG), was constructed (*The Denver Post*, 1957). The CSG US 6 overpasses and interchange at Bryant Street, and the CSG North/South US 6 underpass and interchange at Federal Boulevard/SH 88, were completed in 1958.

The diamond interchange and US 6 CSG overpasses at Sheridan Avenue/SH 95 were completed in 1961. That same year, within the project area, the cloverleaf interchange and US 6 CSG overpasses at Wadsworth Boulevard/SH 121 (Project F-16-O) were completed (Fraser, 2000). This overpass was followed by bridge structures and/or interchanges at Garrison Street (Welded Girder Composite [WGK]), at Kipling Street/SH 391 (CSG), and another North/South US 6 underpass at Perry Street (also a WGK). The six-lane US 6 viaduct was completed in December 1965, which expanded the earlier 1957 viaduct, carrying traffic east and west from Kalamath Street at 6th and 8th Avenues over Burlington Northern & Santa Fe Railroad, and

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Union Pacific Railroad tracks, as well as the associated warehouse and manufacturing district located west of Kalamath Street.

The four lanes of east-west traffic along US 6 at Bryant Street, Sheridan Avenue, Wadsworth Boulevard, and Garrison and Kipling streets were originally carried on paired, 2-lane bridges with open medians. In April 1966, the Colorado Division of Highways announced plans to widen US 6 to six lanes between the Valley Highway/I-25 and Sheridan Avenue, followed in later phases by the widening of the freeway all the way west to Indiana Street. The widening projects required that the open medians created by the paired structures be “closed” in highway engineering parlance, or in-filled with a new superstructure in order to carry the additional lanes in each direction. In 1969, the median at Bryant Street was closed, followed in October 1970 by the closure of the medians created by the paired bridges at Sheridan Avenue and Wadsworth Boulevard, and again in January 1972 by the closure of the medians of the paired bridges at Garrison and Kipling streets (*The Denver Post*, 1972). Subsequent improvement projects in the 1980s and 1990s on the existing US 6 overpasses at Bryant Street, Sheridan Avenue, Wadsworth Boulevard, and Garrison and Kipling streets have primarily involved resurfacing of the roadways, and the replacement of the original guardrails and/or the installation of jersey barriers.

From Project Report, Intensive-Level Survey of Historic Buildings

**FEDERAL BOULEVARD: ALAMEDA AVE. TO 6<sup>TH</sup> AVE.**, Tatanka Historical Associates, Inc.  
15 January 2007

**Federal Blvd. Analysis**

During the late 1800s, Federal Blvd. was an unpaved country road that carried light traffic limited to pedestrians, horses and riders, carriages, and wagons. Originally known as Highland Ave. (named after the Highland neighborhood to the north across Colfax Ave.), beginning in 1871 the street that ran from north to south along the top of the bluff was referred to simply as “The Boulevard.” According to a *Rocky Mountain News* article of the period, in 1872 The Boulevard was “becoming the most popular drive in the neighborhood of Denver. The route is being rendered very attractive, and several miles of carriage road is now in order.” (31 August 1872, p. 4)

Through the Highland neighborhood north of Barnum, cottonwood trees were planted in two rows along each side of the 100'-wide thoroughfare and another row stretched down the middle of the road forming a median. In addition to the foliage and smooth ride, travelers along its length were treated to excellent views of Denver to the east and the mountains to the west. No evidence, however, is found to suggest that these improvements to The Boulevard were continued south of Colfax Ave. during the late 1800s. In 1897 the street was renamed Boulevard F when Denver reorganized its naming system based upon alphabetical classifications. Finally, in 1912 Municipal Ordinance 115 gave the street its lasting name when it was designated Federal Blvd.

Well into the early years of the 20<sup>th</sup> century, Federal Blvd. between Alameda Ave. and 6<sup>th</sup> Ave. was lined on the east and west predominantly by vacant land. Although subdivisions had been platted on both sides of the street, the only buildings that could be found were located in the stretch between 3rd Ave. and 4th Ave. It wasn't until the 1920s that the street saw a building boom, and even then most of the construction focused upon the erection of single-family homes. Following the end of World War I, Denver experienced a decade-long construction

frenzy that included the Barnum and Valverde neighborhoods west and east of Federal Blvd. By the end of the 1920s, Federal Blvd. was lined by numerous residences and a small number of commercial buildings. These were limited to a grocery store and several gasoline stations and auto repair shops.

During the 1930s and early 1940s, the Depression and World War II caused a slow-down in construction and only a few additional residential and commercial buildings appeared along Federal Blvd. between Alameda Ave. and 6<sup>th</sup> Ave., which still contained numerous vacant lots. By the end of World War II, Federal Blvd. had become a major city thoroughfare. As a result, the city rezoned the residential and vacant properties along the street, which allowed these to be developed or redeveloped with commercial uses over the following decades.

During the late 1800s, the Town of Barnum enacted ordinances preventing the sale of liquor within its boundaries. After the town was annexed into the city of Denver, these ordinances were upheld although the commercial corridors along Federal Blvd. and Alameda Ave. were zoned to allow for liquor-related establishments. During the middle decades of the 20<sup>th</sup> century, a number of bars and liquor stores emerged along Federal Blvd. between Alameda Ave. and 6<sup>th</sup> Ave., further adding to the negative image of the area in the public's perceptions.

Between 1945 and 1980, Federal Blvd. changed drastically. Previously dominated by residences, by the end of the 1970s the street was lined with numerous businesses. Fifty-four of the commercial buildings found along Federal Blvd. today were constructed during the period between 1950 and 1980 alone. While some of these appeared on long-vacant lots, many others occupied or replaced earlier homes, in some cases through extensive renovations or outright demolition.

As the thoroughfare became increasingly commercial and utilized by heavy volumes of traffic in the post-war era, Federal Blvd. began to present itself as a physical barrier between the neighborhoods to the east and west. By the 1970s, motorists traveling along its length saw a mile-long vista of liquor stores and bars, auto repair shops, used car sales lots, and adult bookstores. Many of these businesses remain there today, some of them occupying new buildings while numerous others are housed in renovated and expanded older residences and commercial buildings.

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## 4.0 RESEARCH DESIGN AND FILE SEARCH RESULTS

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The US-6 Bridge Reconstruction Project occurs within an area that was originally surveyed in the spring of 2004 as part of the Valley Highway EIS - Logan to 6<sup>th</sup> Avenue. When the Valley Highway EIS cultural resource survey was conducted, many architectural resources along 6<sup>th</sup> Avenue were too young to be surveyed for NRHP eligibility. As a result, this cultural resource survey includes seventeen (17) architectural and six (6) linear resources of which are previously unrecorded. In addition, there are three (3) architectural and two (2) linear resources originally recorded in the Valley Highway EIS that have been revisited in this study.

Objectives for the US-6 Bridge Reconstruction Project cultural resource survey are to identify all cultural resources occurring within a pre-defined Area of Potential Effects (APE) encompassing the project area, and to evaluate the significance of each cultural resource in the APE in terms of eligibility or inclusion in the National Register of Historic Places (NRHP). The documentation and significance assessments are intended to facilitate determination of the proposed project's effects on historic properties (properties listed in or eligible for inclusion in the NRHP).

A file search for T4S, R68W, Sections 4, 5, 8, and 9 was conducted through the Colorado Historical Society's database in April, 2012. As expected, previous cultural resource surveys have recorded numerous cultural resources within these sections, including 533 sites and two historic districts. Previously recorded sites within the APE include 16 historic architectural sites, 10 historic linear sites and 5 historic bridges. Summary data about these sites are presented in **Table 1**, and their locations are shown on **Figure 2**.



#### 4.1 Previously Recorded Cultural Resources

Site No.	Site ID	Site Type	NRHP-Eligibility	Date Eval.	Survey Completed By	Remarks
<b>Historic Bridges</b>						
5DV7076	US-6, Underpass at I-25	Historic Bridge	Not Eligible-Official	2002	Fraser Design	Compass assessment is <i>not eligible-field</i>
5DV7080	US-6, S. Platte River Bridge	Historic Bridge	Not Eligible-Official	2002	Fraser Design	Compass assessment is <i>not eligible-field</i>
5DV7082	US 6, Overpass at BNSF	Historic Bridge	Not Eligible	2002	Fraser Design	Compass assessment is <i>not eligible-field</i>
5DV7083	US-6, Overpass at Federal	Historic Bridge	Not Eligible-Field	2002 & 2012	Fraser Design and Jason Marmor	Re-evaluated <i>not eligible</i> in Feb. 2012
5DV7084	Knox Court Underpass	Historic Bridge	Not Eligible-Field	2002	Fraser Design	Not re-evaluated in 2012, will be evaluated in upcoming bridge survey
5DV7085	US-6, Bryant Street Overpass	Historic Bridge	Not Eligible-Official	2002	Fraser Design	Compass assessment is <i>not eligible-field</i>
<b>Historic Buildings and Structures</b>						
5DV.5134	2214 West 8 <sup>th</sup> Ave.	Commercial	Officially Eligible	1996 & 2012	Hermesen Consultants and FHU	Re-evaluated as eligible in June 2012
5DV.8325	601 Bryant Street	Commercial	Not Eligible	2004, 2012	2004-FHU 2012-FHU	Re-evaluated <i>not eligible</i> in April 2012

Site No.	Site ID	Site Type	NRHP-Eligibility	Date Eval.	Survey Completed By	Remarks
5DV.9065	499 Federal Blvd.	Commercial	Not Eligible-Official	2004, 2012	2004-FHU 2012-Jason Marmor	Re-evaluated <i>not eligible</i> in April 2012
5DV.9848	450 Federal Boulevard	Commercial	Not Eligible-Officially	2007, 2012	2007-Tatanka Historical Associates 2012-FHU	Re-evaluated <i>not eligible</i> in April 2012
<b>Historical Linear Sites</b>						
5DV.4783.3	Atchison, Topeka & Santa Fe	Transportation-Railroad	Non-contributing segment of officially eligible resource	2004	FHU	Segment not re-evaluated; CDOT agrees with official determination. Recorded 5DV.4783.5 (see below)
5DV.6033.14	Valley Highway	Transportation-Highway	Not Eligible-Officially	2004	FHU	Not re-evaluated, resource is not NRHP eligible
5DV.6243.2	Denver, South Park & Pacific R.R.	Transportation-Railroad	Non-contributing segment of officially eligible resource	2004	FHU	Segment not re-evaluated; CDOT agrees with official determination. Recorded 5DV.6243.8 (see below)
5DV9105.2	Denver & New Orleans Railroad	Transportation-Railroad	Not Eligible-Officially	2004	FHU	Segment not re-evaluated; CDOT agrees with official determination. Recorded 5DV.9105.4 (see below)

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## 5.0 METHODOLOGY

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The cultural resource investigation for the US-6 Bridge Reconstruction Project included a series of reconnaissance surveys, intensive-level inventory of selected buildings and structures, archival research, and preparation of architectural inventory forms and the survey report. The study was carried out in accordance with the guidelines of the Colorado Historical Society/Office of Archaeology and Historic Preservation (CHS/OAHP), as published in the *Colorado Cultural Resource Survey Manual* (1998). The methods employed in the investigation are detailed below.

### Reconnaissance Survey

A preliminary reconnaissance survey of the project area was completed during April, 2012. This effort involved the identification of all historic and potentially historic resources occurring within the APE. Each building or structure within the APE was examined and all (23) sites that appeared to exceed 44 years of age were briefly described and plotted on an aerial photograph of the project area. Subsequently, the list of historic and potentially historic resources was refined by reviewing the online property record database maintained by the City and County of Denver Assessor's Office (<http://www.denvergov.org/realproperty.asp>). Uncertain dates of construction were resolved in some cases by examining Sanborn fire insurance maps of the project area as well as building permit records, in the Denver Public Library's Western History Department and Denver Building Department.

### Field Inventory Methods

The architectural attributes of buildings selected for intensive-level survey were recorded in detail. Architectural recording included narrative description, stylistic analysis, assessment of structural and cosmetic modification, and evaluation of exterior condition and integrity. Determinations of style primarily followed the classification system provided in *A Guide to Colorado's Historic Architecture and Engineering*, (2008). Wherever possible, each property was photographed in color from at least two angles, to show multiple sides of the building or structure. In addition, any unique or noteworthy architectural details were photographed. Photographs were taken using a digital camera. A minimum of two 4 x 6 inch color prints were produced for each property recorded and submitted with each site form.

### Archival Research Methods

Historical information about the project area and about specific historical resources within the APE was collected at various information repositories in Denver. Information sources consulted included existing site forms and survey reports on file at the CHS/OAHP in Denver. Dates of construction, ownership, lot size and other information about the inventoried buildings were obtained from property records maintained by the Denver County Assessor's Office. Sanborn fire insurance maps and other historical maps, city directories, building permit records, published histories of Denver and newspaper clippings were reviewed at the Denver Public Library, Western History Department and Denver Building Department.

## Significance Evaluation

All cultural resources identified within the project area were evaluated for significance in terms of eligibility for inclusion in the National Register of Historic Places (NRHP). The NRHP was established in 1966 as part of the National Historic Preservation Act, and is administered by the National Park Service. The criteria properties must meet to be eligible for listing on the NRHP are specified in the Code of Federal Regulations, Title 36, Part 60:

“The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:

- A) That are associated with events that have made a significant contribution to the broad patterns of our history; or
- B) That are associated with the lives of persons significant in our past; or
- C) That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D) That has yielded, or may be likely to yield, information important in prehistory or history.”

## Inventory Form Preparation

Colorado cultural resource inventory forms were prepared for each historical resource identified within the APE. CHS *Management Data Forms* (OAHP 1400) and *Linear Component Forms* (OAHP 1418) were filled out for each linear site (e.g. railroad). *Architectural Inventory Forms* (OAHP 1403) were completed for each architectural property, while site-specific historical and architectural information collected during the investigation was summarized on these inventory forms. Narrative architectural descriptions, historical summaries, and significance assessments for each resource are repeated in the Results section (Section 6.0) of this report.

## 6.0 RESULTS

A total of 23 historic cultural resources were newly inventoried for the US-6 Bridge Reconstruction Project. These include 17 historic buildings and 6 linear transportation features. Summary data about these resources are presented in **Table 2**. Locations of newly inventoried historical resources are depicted on **Figure 3**. Detailed descriptive and historical information about each resource is presented below, arranged in ascending order by site number.

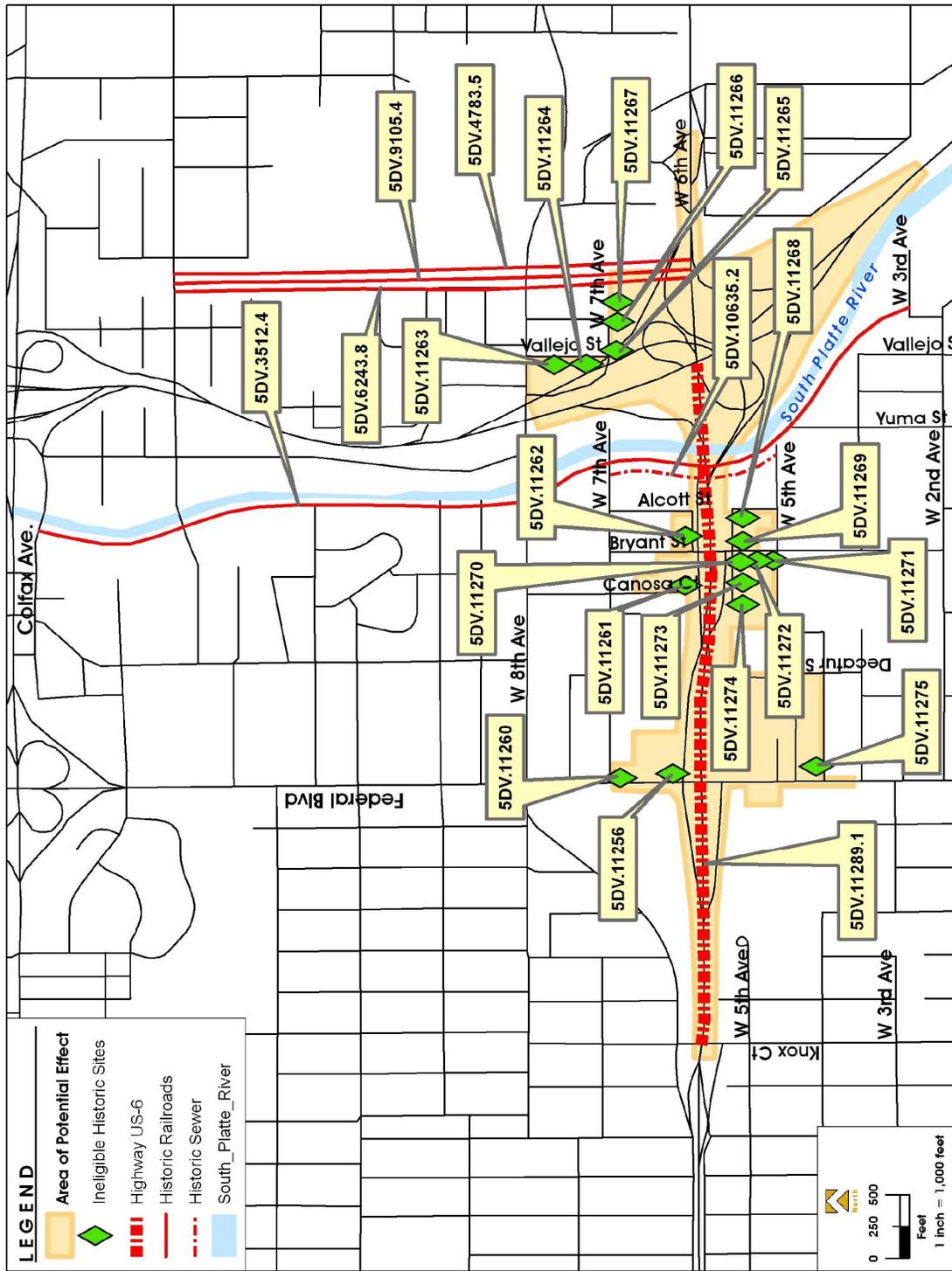
### 6.1 Newly Recorded Resources

Site No.	Site ID	Site Type	NRHP-Eligibility	Date Evaluated	Survey Completed By	Contrib to NRHP District?
<b>Historical Linear Sites</b>						
5DV.3512.4	Denver West Side Line	Linear-Railroad	Non-contributing segment of officially eligible resource	2012	D. Litvak	No
5DV.4783.5	Atchison, Topeka & Santa Fe	Linear-Railroad	Non-contributing segment of officially eligible resource	2012	D. Litvak	No
5DV.6243.8	Denver, South Park & Pacific	Linear-Railroad	Non-contributing segment of officially eligible resource	2012	D. Litvak	No
5DV.9105.4	Denver & New Orleans	Linear-Railroad	Not Eligible—field	2012	D. Litvak	No
5DV.10635.6	West & South Side Interceptor	Linear-Sewer	Contributing segment of field eligible resource	2012	G. Keeley	Yes—brick lined sewer district
5DV.11289.1	US Highway 6	Linear--Highway	Non-contributing segment of officially eligible resource	2012	D. Litvak	No
<b>Historic Buildings and Structures</b>						
5DV.11256	620 Federal Boulevard	Commercial	Not Eligible--Field	2012	J. Marmor	No

US 6 Bridge Reconstruction:  
Bryant Street, S. Platte River, and I-25 Project



Site No.	Site ID	Site Type	NRHP-Eligibility	Date Evaluated	Survey Completed By	Contrib to NRHP District?
5DV.11260	690 Federal Boulevard	Commercial	Not Eligible--Field	2012	FHU	No
5DV.11261	2627 West 6 <sup>th</sup> Avenue	Commercial	Not Eligible--Field	2012	FHU	No
5DV.11262	2525 West 6 <sup>th</sup> Avenue	Commercial	Not Eligible--Field	2012	FHU	No
5DV.11263	781 Vallejo Street	Commercial	Not Eligible--Field	2012	FHU	No
5DV.11264	745 Vallejo Street	Commercial	Not Eligible--Field	2012	FHU	No
5DV.11265	2120 West 7 <sup>th</sup> Avenue	Commercial	Not Eligible--Field	2012	FHU	No
5DV.11266	2050 West 7 <sup>th</sup> Avenue	Commercial	Not Eligible--Field	2012	FHU	No
5DV.11267	2038 West 7 <sup>th</sup> Avenue	Commercial	Not Eligible--Field	2012	FHU	No
5DV.11268	535 Alcott Street	Commercial	Not Eligible--Field	2012	FHU	No
5DV.11269	516 Bryant Street	Commercial	Not Eligible--Field	2012	FHU	No
5DV.11270	543 Bryant Street	Commercial	Not Eligible--Field	2012	FHU	No
5DV.11271	505 Bryant Street	Commercial	Not Eligible--Field	2012	FHU	No
5DV.11272	525 Bryant Street	Commercial	Not Eligible--Field	2012	FHU	No
5DV.11273	2650 West 6 <sup>th</sup> Avenue	Commercial	Not Eligible--Field	2012	FHU	No
5DV.11274	2700 West 6 <sup>th</sup> Avenue	Commercial	Not Eligible--Field	2012	FHU	No
5DV.11275	2947 West Short Place	Commercial	Not Eligible--Field	2012	FHU	No



**Figure 3** Newly Recorded Cultural Resource Locations

## 6.2 Newly Recorded Historic Buildings and Structures

### 620 Federal Boulevard (5DV.11256)

Description: This building consists of a complex of four stucco-covered masonry buildings, including three 2- and 3-story room blocks arranged in a “U” configuration, in front of which is and a modern one-story commercial restaurant/motel office building. The motel office contains a single-story lobby area as well as a two-story northern section, all under an asymmetrically-sloped front gable roof. Each room block has a red-ribbed sheet metal-clad awning structures covering the walkways extend the length of each room block, and are supported at intervals by substantial, stucco-covered square-sided piers or posts. Small decorative gables are also placed at intervals along the awning structures (see **Figure 4**).



**Figure 4** 620 Federal Boulevard (5DV.11256)

Historical Summary: This property has been in continuous use as a motel since its construction in 1963. The motel was remodeled in 1995 and made part of the Days Inn chain of motels where they added sheet metal awnings to the room blocks and converted the original restaurant into an office and lobby space for the motel.

Significance Assessment: This building has served for nearly 50 years as a motel which was a response to the development of the highways through Denver. However, the integrity of this building has been compromised by alterations that were made to the exterior of the building through several changes of ownership throughout the years. These components are critical to conveying the historic significance of the original complex and therefore disqualify the building from eligibility in the NRHP.

### 690 Federal Boulevard (5DV.11260)

Description: The northern portion of the existing building is the original service station, consisting of the specialty store and a two-bay garage for repair work. An additional two-bay garage was added to the southern end of the building and can be identified by a higher roofline.

The west elevation facing Federal Boulevard constitutes the front façade of the building and includes the doors to the service garage space as well as the display area of the sales office. The original service station was constructed of concrete block and clad in metal panels with a deep roof overhang, while the garage addition has a simple cornice (see **Figure 5**).



**Figure 5** 690 Federal Boulevard (5DV.11260)

Historical Summary: The original portion of the building which defines the Gulf Service Station display/sales area and two garage bays was built in 1956. A later addition to the garage space was made in the early 2000's.

Significance Assessment: The original portion of the building is significant to the automotive development of Denver however the integrity has been compromised by a recent addition to the building and from the loss of site features that were essential for conveying the original character of the historic site which disqualify it from eligibility in the NRHP.

### **2627 West 6<sup>th</sup> Avenue (5DV.11261)**

Description: Located on the northeast corner of North Canosa Court and West 6<sup>th</sup> Avenue, the building consists of a one-story brick office wing along the south end of the site with a series of one and two-story, concrete-block warehouse additions extending to the north. Clad in painted brick, the office wing consists of the main entrance and several windows that dot the south end of the building. The warehouse additions are constructed of concrete-block with randomly spaced window and door openings (see **Figure 6**).



**Figure 6** 2627 West 6<sup>th</sup> Avenue (5DV.11261)

Historical Summary: The original portion of the building which includes the office wing, narrow east warehouse and north warehouse was erected between 1952 and 1954. The office area was expanded in 1959 by 825 square feet and another warehouse expansion occurred in 1971.

Significance Assessment: This nondescript industrial/warehouse building is not a noteworthy or unique example of mid 20<sup>th</sup> century industrial architecture, and none of its known uses are of importance in local, state, or national history. Therefore, the property does not qualify as eligible for inclusion in the NRHP.

### **2525 West 6<sup>th</sup> Avenue (5DV.11262)**

Description: Located on the northwest corner of West 6<sup>th</sup> Avenue and Alcott Street, this property consists of a very simple, large two-story brick industrial/commercial building. The main portion of the building is square, while a small two-story wing extends to the east from the northeast corner of the building. Facing south, the front façade is located along West 6<sup>th</sup> Avenue where a decorative metal trim band protruding a couple feet from the face of the building, frames the main entrance. A large portion of the south elevation is clad in a limestone-like, stone or concrete veneer that matches the color of the metal trim detail. The current building portrays nearly all of the components of the original structure constructed in 1962 (see **Figure 7**).



**Figure 7** 2525 West 6<sup>th</sup> Avenue (5DV.11262)

Historical Summary: While this building was constructed in mid-to-late 1962, the current owners Downtown Radio of Denver moved into the building in 1985.

Significance Assessment: This basic industrial warehouse/office building is not a noteworthy or unique example of mid 20<sup>th</sup> century industrial architecture, and none of its known uses are of importance in local, state, or national history. Therefore, the property does not qualify as eligible for inclusion in the NRHP.

### **781 Vallejo Street (5DV.11263)**

Description: Located close to the southwest corner of West 8<sup>th</sup> Avenue and Vallejo Street, this property consists of a moderately sized, one-story industrial/commercial building with a flat roof. All four elevations have a brick veneer and simple, wide metal cornice. With a rectangular plan, the building appears to consist of four units, each unit with its own entrance and pair of windows facing the parking lot along the east elevation. Two of the units have large overhead doors which allow loading directly from the east parking lot along Vallejo Street (see **Figure 8**).



**Figure 8** 781 Vallejo Street (5DV.11263)

Historical Summary: This commercial and industrial building was constructed in 1961. The entire building appears to have been built at the same time and still possesses its original character.

Significance Assessment: This basic industrial warehouse/office building is not a noteworthy or unique example of mid 20<sup>th</sup> century industrial architecture, and none of its known uses are of importance in local, state, or national history. Therefore, the property does not qualify as eligible for inclusion in the NRHP.

### **745 Vallejo Street (5DV.11264)**

Description: This property is located on the west side of Vallejo Street, between 7<sup>th</sup> and 8<sup>th</sup> Avenue and consists of a small, one-story industrial building. The east elevation is clad in dark-brown brick, while the remainder of the building has a painted concrete block exterior. Along the south elevation, a small suspended metal canopy marks the entry door. This property is combined with an additional parcel to the south under the same ownership. Both parcels are of equal size, the building occupying the majority of the northern parcel while the southern parcel, a grassy/gravelly site, is utilized for outdoor storage (see **Figure 9**).



**Figure 9** 745 Vallejo Street (5DV.11264)

Historical Summary: This commercial and industrial building was constructed in 1961. The entire building was built at the same time and still possesses its original character.

Significance Assessment: This basic industrial warehouse/office building is not a noteworthy or unique example of mid 20<sup>th</sup> century industrial architecture, and none of its known uses are of importance in local, state, or national history. Therefore, the property does not qualify as eligible for inclusion in the NRHP.

### **2120 West 7<sup>th</sup> Avenue (5DV.11265)**

Description: Located along the south side of West 7<sup>th</sup> Avenue, between Vallejo and Umatilla Streets, this property consists of a simple, flat-roofed industrial building with a linear footprint oriented east-west. The eastern three-quarters of the building is one-story while the western

quarter is two-story. The exterior of the building is painted gray and has blue trim around window and door openings and along the cornice. It is constructed of concrete block in a “horizontal stack” pattern where the blocks are stacked on each other in vertical columns, as opposed to the traditional “running bond” pattern where blocks are staggered to create an interlocking bond (see **Figure 10**).



**Figure 10** 2120 West 7<sup>th</sup> Avenue (5DV.11265)

Historical Summary: From 1959-1963, property owner Jared Morse redeveloped all of the parcels along the south side of West 7<sup>th</sup> Avenue between Vallejo Street and the railroad easement which consists of 2040, 2050, 2070 and 2120 West 7<sup>th</sup> Avenue. This industrial building was constructed in 1963.

Significance Assessment: This basic industrial warehouse/office building is not a noteworthy or unique example of mid 20<sup>th</sup> century industrial architecture, and none of its known uses are of importance in local, state, or national history. Therefore, the property does not qualify as eligible for inclusion in the NRHP.

### **2050 West 7<sup>th</sup> Avenue (5DV.11266)**

Description: Located south of the intersection between West 7<sup>th</sup> Avenue and Umatilla Streets, this property consists of a large one-story, flat-roof industrial building consisting of three main components which include the original office space on the north end along West 7<sup>th</sup> Avenue, the original warehouse in the middle and a simple steel warehouse addition on the south end. The original portion is constructed of concrete block in a “horizontal stack” pattern where the blocks are stacked on each other in vertical columns, as opposed to the traditional “running bond” pattern where blocks are staggered to create an interlocking bond (see **Figure 11**).



**Figure 11** 2050 West 7<sup>th</sup> Avenue (5DV.11266)

Historical Summary: This industrial building was constructed in 1959. From 1959-1963, property owner Jared Morse redeveloped all of the parcels along the south side of West 7<sup>th</sup> Avenue between Vallejo Street and the railroad easement which consists of 2040, 2050, 2070 and 2120 West 7<sup>th</sup> Avenue.

Significance Assessment: This basic industrial warehouse/office building is not a noteworthy or unique example of mid 20<sup>th</sup> century industrial architecture, and none of its known uses are of importance in local, state, or national history. Therefore, the property does not qualify as eligible for inclusion in the NRHP.

### **2038 West 7<sup>th</sup> Avenue (5DV.11267)**

Description: Located along the south side of West 7<sup>th</sup> Avenue, just east of Umatilla Street, this property consists of a large one-story, flat roof industrial building. The building footprint consists of a north warehouse and a south warehouse that are connected but offset from each other. A small connected office is located along West 7<sup>th</sup> Avenue. The entire building is constructed of concrete block in a “horizontal stack” pattern where the blocks are stacked on each other in vertical columns, as opposed to the traditional “running bond” pattern where blocks are staggered to create an interlocking bond. The office portion of the building has a roof line that is slightly lower than the two warehouses (see **Figure 12**).



**Figure 12** 2038 West 7<sup>th</sup> Avenue (5DV.11267)

Historical Summary: The large warehouse in the middle section of the building was constructed in 1961, while the office section on the north end of the building was added in 1964. The smaller warehouse on the south end of the building was added between 1964 and 1975. From 1959-1963, property owner Jared Morse redeveloped all of the parcels along the south side of West 7<sup>th</sup> Avenue between Vallejo Street and the railroad easement which consists of 2040, 2050, 2070 and 2120 West 7<sup>th</sup> Avenue.

Significance Assessment: This basic industrial warehouse/office building is not a noteworthy or unique example of mid 20<sup>th</sup> century industrial architecture, and none of its known uses are of importance in local, state, or national history. Therefore, the property does not qualify as eligible for inclusion in the NRHP.

### **535 Alcott Street (5DV.11268)**

Description: Located on the southwest corner of West 6<sup>th</sup> Avenue and Alcott Street, this property consists of a tall, simple one-story, rectangular concrete block building with a flat roof. The building is owned by Ryder Truck Rentals and is utilized as a repair shop for their fleet of vehicles. Both east and west elevations have four large overhead doors that provide access to four separate garage bays. A tall, two-post steel sign straddles the garage bay door opening on the north end of the building making it visible from US-6 (see **Figure 13**).



**Figure 13** 535 Alcott Street (5DV.11268)

Historical Summary: In 1965, the Sanborn Fire Insurance maps show that a residential dwelling occurred on the lot where this building is located, while a different truck rental shop was located on the two lots south of here. The current facility was constructed in 1967.

Significance Assessment: This basic industrial garage facility is not a noteworthy or unique example of mid 20<sup>th</sup> century industrial architecture, and none of its known uses are of importance in local, state, or national history. Therefore, the property does not qualify as eligible for inclusion in the NRHP.

### **516 Bryant Street (5DV.11269)**

Description: Located on the southeast corner of W. 6<sup>th</sup> Avenue and North Bryant Street, this

property consists of a tall, one-story brick building with a flat roof. The building is owned and occupied by Ryder Truck Rentals that utilize the space for their offices. The main entrance is located along the north elevation which fronts W. 6<sup>th</sup> Avenue. Customers can park along the north side of the building and enter through an enclosed vestibule with two brick end walls on the east and west, and glazing along the north wall. The building is slightly elevated, with the lower basement level partially exposed and the main level approximately five feet above finished grade (see **Figure 14**).



**Figure 14** 516 Bryant Street (5DV.11269)

Historical Summary: Sanborn Maps from 1955 show this block of the Wier Addition to be a mixture of residential homes and light industrial businesses. This particular site was occupied by the home of Fred K. Bryant in 1955. In 1961, Ryder Truck Rental Company built the current facility and has continued to occupy the space ever since.

Significance Assessment: This basic industrial office building is not a noteworthy or unique example of mid 20<sup>th</sup> century industrial architecture, and none of its known uses are of importance in local, state, or national history. Therefore, the property does not qualify as eligible for inclusion in the NRHP.

### **543 Bryant Street (5DV.11270)**

Description: Located on the southwest corner of W. 6<sup>th</sup> Avenue and North Bryant Street, this property consists of a one-story, former restaurant built in the late 1950's. This building has characteristics of two unique architectural styles that were popular during the 1950's; Googie and Usonian. Googie architecture refers particularly to restaurants and was created after World War II when Americans began to embrace the new car-oriented lifestyle of America. The Usonian style of architecture was developed by Frank Lloyd Wright and sought to create a simple, modern style of architecture that was uniquely American. Both styles attempted to blur the distinction between indoors and outdoors with deep overhangs and large windows allowing people to easily view into the building from outside and visa versa (see **Figure 15**).



**Figure 15 543 Bryant Street (5DV.11270)**

Historical Summary: This building was constructed in 1958 with the construction of an addition in 1959. Records indicate the original business that occupied this building was called the Harvest House Restaurant. As several commercial and industrial buildings began to pop up in this area during the late 1950's, there was a need for restaurants that could cater to all the employees working in these new businesses.

Significance Assessment: While this building takes cues from the Usonian style, it is not a true example of Usonian architecture which refers to the middle-class oriented residential architecture developed by Frank Lloyd Wright during the 1930's, 40's, and 50's. Likewise, the building is too plain to be considered a noteworthy example of Googie restaurant architecture which was characterized by bright colors, multiple contrasting materials and neon lights. It is also unknown who the original architect or designer was which makes it difficult to make a determination in its originality. Therefore, the property does not qualify as eligible for inclusion in the NRHP.

### **505 Bryant Street (5DV.11271)**

Description: Located on the northwest corner of W. 5<sup>th</sup> Avenue and North Bryant Street, this property consists of a simple rectangular, one-story, flat roofed industrial/office building. The front façade is defined by the east elevation, which faces North Bryant Street. Occupying the left 1/3 of the east elevation, the main entrance is defined by two sliding glass aluminum windows and an entry door consisting of a full height glass sidelight and thin transom window. A metal canopy covers the main entry cantilevering from the face of the front façade approximately 4 feet (see **Figure 16**).



**Figure 16 505 Bryant Street (5DV.11271)**

Historical Summary: This building was constructed in 1962 for the Chicago Pneumatic Company. This building was originally owned by Clarence Guenther who owned the building next door to the north at 525 N. Bryant Street. The two buildings are nearly identical in shape, size and method of construction.

Significance Assessment: This basic industrial office building is not a noteworthy or unique example of mid 20<sup>th</sup> century industrial architecture, and none of its known uses are of importance in local, state, or national history. Therefore, the property does not qualify as eligible for inclusion in the NRHP.

### **525 Bryant Street (5DV.11272)**

Description: Located just north of the northwest corner of W. 5<sup>th</sup> Avenue and N. Bryant Street, this property consists of a simple rectangular, one-story, flat roofed industrial/office building. The front façade is defined by the east elevation, which faces North Bryant Street. Occupying the left 1/3 of the east elevation, the main entrance is defined by an entry door consisting of a full height glass sidelight and thin transom window. A metal canopy covers the main entry cantilevering from the face of the front façade approximately 4 feet (see **Figure 17**).



**Figure 17** 525 Bryant Street (5DV.11272)

Historical Summary: This building was constructed in 1962 for Roy P. Mulhausen of Packard Authorized Sales. This building was originally owned by Clarence Guenther who owned the building next door to the south at 505 N. Bryant Street. The two buildings are nearly identical in shape, size and method of construction.

Significance Assessment: This basic industrial office building is not a noteworthy or unique example of mid 20<sup>th</sup> century industrial architecture, and none of its known uses are of importance in local, state, or national history. Therefore, the property does not qualify as eligible for inclusion in the NRHP.

### **2650 West 6<sup>th</sup> Avenue (5DV.11273)**

Description: Located just west of N. Bryant Street between W. 5<sup>th</sup> and 6<sup>th</sup> Avenues, this property consists of a very tall, large rectangular flat-roofed industrial building. Faced in brick, the northern three quarters of the building consists of the original structure built in 1959, while the southern quarter is a concrete block addition built in 1985. The majority of the building consists

of warehouse space, while a mezzanine located near the center of the building holds offices. The main entrance opens into a showroom on the building's north end (see **Figure 18**).



**Figure 18** 2650 West 6<sup>th</sup> Avenue (5DV.11273)

**Historical Summary:** This building was constructed in 1959 for Genuine Parts Company. Today the building is occupied by the Game Exchange of Colorado, a company that sells restored billiards games and electronics.

**Significance Assessment:** This simple industrial showroom and warehouse is not a noteworthy or unique example of mid 20<sup>th</sup> century industrial architecture, and none of its known uses are of importance in local, state, or national history. Therefore, the property does not qualify as eligible for inclusion in the NRHP.

### **2700 West 6<sup>th</sup> Avenue (5DV.11274)**

**Description:** Located west of N. Bryant Street between W. 5<sup>th</sup> and 6<sup>th</sup> Avenues, this property consists of a large, rectangular industrial building with two distinct sections. The northern one-third of the building consists of a low, one-story office area with a flat roof. The southern two-thirds of the building consists of a taller warehouse area with a barrel roof. There is a large billboard type sign mounted to the northern section of the warehouse roof with company logo. This elevated sign faces north and was meant to be seen by travelers on US-6 (see **Figure 19**).



**Figure 19** 2700 West 6<sup>th</sup> Avenue (5DV.11274)

**Historical Summary:** This building was constructed in 1960 for Refrigeration Distribution Company. Currently, the building is owned by Sid Harvey's Refrigeration, Heating and Air Conditioning a business very similar to what originally occupied the space.

Significance Assessment: This simple industrial showroom and warehouse is not a noteworthy or unique example of mid 20<sup>th</sup> century industrial architecture, and none of its known uses are of importance in local, state, or national history. Therefore, the property does not qualify as eligible for inclusion in the NRHP.

### **2947 West Short Place (5DV.11275)**

Description: Located on the north side of West Short Place just east of Federal Boulevard and extending all the way north to W. 5<sup>th</sup> Avenue, this property consists of a one-story, brick ranch duplex with a shallow-pitched gable roof along the entire length of the building. The entrances to both living units are accessible from the east elevation, while parking is located on the north and south ends of the property (see **Figure 20**).



**Figure 20** 2947 West Short Place (5DV.11275)

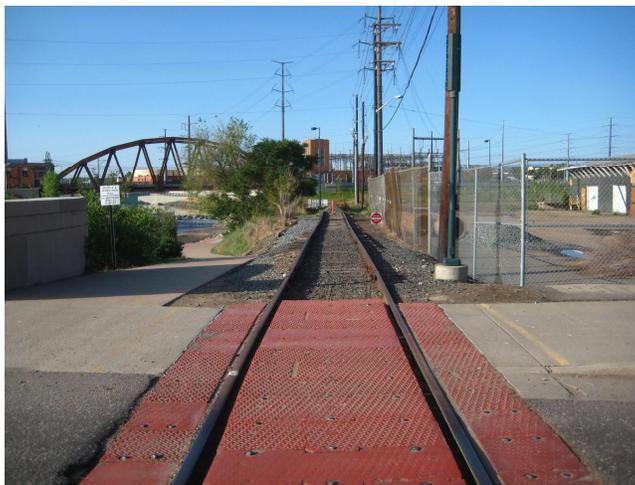
Historical Summary: This modest residential duplex was constructed in 1962 and originally occupied by Susan Roesler, Pat Blue, Jean Fenton and Kathy Turner in 1963. Today it remains occupied as a duplex residential living unit.

Significance Assessment: This brick duplex lacks the historic or architectural significance that would make it a noteworthy example of mid-to-late 20<sup>th</sup> century residential architecture and none of its known uses are of importance in local, state, or national history. Therefore, the property does not qualify as eligible for inclusion in the NRHP.

### 6.3 Newly Recorded Linear Resources

#### Denver West Side Line (5DV.3512.4)

Description: The Denver West Side Line is a former freight railroad that bypassed other Denver railroads on the west side of the South Platte River. The length of the entire resource is 4.85 miles long, with the railroad carrying freight between Clark's Junction (West 48<sup>th</sup> Ave. and Pearl) and Canon Junction (2<sup>nd</sup> Ave. and Umatilla). The segment recorded is between W. Colfax Avenue on the north and 2<sup>nd</sup> Ave. on the south (see **Figure 21**).



**Figure 21** Denver West Side Line (5DV.3512.4)  
Looking South from W. Colfax Avenue

Historical Summary: The Denver West Side Line was built to carry freight traffic for the Union Pacific Denver & Gulf Railroad and bypassed other railroads that traveled on the east side of the South Platte River. The UPD&G was part of Jay Gould's Union Pacific Railroad built between 1890-1891.

Significance Assessment: The West Side Line played an important role in transporting freight that supported the commercial development of Denver and for this reason the entire resource is evaluated as eligible to the NRHP under Criterion A. However, this segment of the line no longer conveys significance because the grade is no longer distinguishable and the tracks, ties, and associated objects have been removed from a portion of this segment.

#### Atchison, Topeka & Santa Fe (5DV.4783.5)

Description: This segment of the Atchison, Topeka & Santa Fe Railway is 1220 meters (.76 miles) long and extends between the 6<sup>th</sup> Avenue Freeway and 13<sup>th</sup> Avenue. The railroad has been subjected to periodic maintenance including replacement of rails, cross-ties, and ballast. The original railway extended 124 miles, from Pueblo to Denver and was built in 1887 by the Denver & Santa Fe Railway (a subsidiary of the AT&SF). North of West 6<sup>th</sup> Avenue, the rail line continues northward to the extensive train assembly yards on the west side of downtown Denver. The AT&SF also extends from the Colorado state line at the Arkansas River to the

Royal Gorge and from Pueblo down to Raton Pass (see **Figure 22**).



**Figure 22** *Atchison, Topeka & Santa Fe (5DV.4783.5)  
Looking North from beneath the US-6 Overpass*

Historical Summary: This railroad segment is part of the Atchison, Topeka, and Santa Fe Railway (AT&SF) line constructed from Pueblo to Denver in 1887. The ATSF Pueblo to Denver rail line has been in continuous use by freight and passenger trains since 1887. In 1995 the ATSF's parent company, the Santa Fe Pacific Corporation merged with the Burlington Northern Railroad to form the giant Burlington Northern Santa Fe Corporation (BNSF) operator of one of the most extensive rail networks in North America.

Significance Assessment: The AT&SF quickly constructed rails into Colorado, starting with the first railroad bridge built over the Arkansas River at the Colorado state line in Prowers County and eventually reaching Denver from Pueblo in 1887. The entire railway as a resource is considered eligible to the NRHP however this segment does not contribute to its eligibility. The rail line location, alignment and grade are original, but the tracks, ties, and associated material have all been replaced. The setting of this particular segment has changed substantially and there is very little left to convey the period of significance of 1873-1887.

### **Denver, South Park & Pacific (5DV.6243.8)**

Description: This segment of the Denver, South Park & Pacific Railroad is 1220 meters (.76 miles) long and extends between the 6<sup>th</sup> Avenue Freeway and 13<sup>th</sup> Avenue. The railroad has been subjected to periodic maintenance including replacement of rails, cross-ties, and ballast. The segment was originally part of the Denver section of the DSP&P Railroad. The line extended from Denver to Morrison, South Park, Breckendridge, Keystone, Dillon, Buena Vista, and Leadville and included the 1,800 foot long Alpine Tunnel (blt. 1880-1881) between the rail stops of St. Elmo and Pitkin to reach Gunnison and Crested Butte (see **Figure 23**).



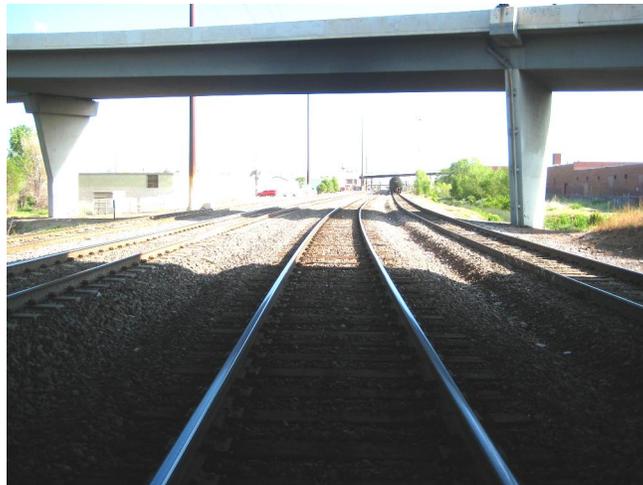
**Figure 23** *Denver, South Park & Pacific (5DV.6243.8)  
Looking North from beneath the US-6 Overpass*

Historical Summary: The Denver, South Park & Pacific Railroad (DSP&P) was incorporated in 1873 by Denver pioneers John Evans, David Moffat, and Walter Cheesman. Most of the railroad was constructed between 1874 and 1884 and provided rail links to the mining towns of Breckenridge, Dillon, Keystone, Fairplay, Leadville, Alma, Buena Vista, and, via Gunnison, St. Elmo and Crested Butte. The Colorado & Southern Railway (C&S) operated the line from 1898-1970, when the company merged into the Burlington Northern Railroad. In 1995, the Burlington Northern merged with another major railroad, the Atchison, Topeka, and Santa Fe (ATSF) to form the giant Burlington Northern Santa Fe (BNSF), operator of one of the most extensive rail networks in North America.

Significance Assessment: Road construction, in particular, has changed the segment dramatically with overpasses, underpasses, and at-grade crossings of the 6th Avenue Freeway, 8th Avenue viaduct, 13th Avenue, and the Valley Highway. The entire railway as a resource is considered eligible to the NRHP however this segment does not contribute to its eligibility. The setting, materials, workmanship, and feeling no longer convey the period of significance for this segment of the railroad of 1872-1889. The rail line is in its original location and the alignment and grade are original, but the tracks, ties, and associated material have all been replaced.

### **Denver & New Orleans (5DV.9105.4)**

Description: This segment of the Denver & New Orleans is 1220 meters (.76 miles) long and extends between the 6<sup>th</sup> Avenue Freeway and 13<sup>th</sup> Avenue. The railroad has been in continuous use since 1881 and has been subjected to periodic maintenance including replacement of rails, cross-ties, and ballast. This segment was part of a 35 mile long segment between Denver southeast to a point near Elizabeth line built by the Denver & New Orleans Railroad in 1881 and to Pueblo and 1882 via the town of Fountain and on the east side of Fountain Creek (see **Figure 24**).



**Figure 24** **Denver & New Orleans (5DV.9105.4)**  
**Looking North from beneath the US-6 Overpass**

Historical Summary: The Denver and New Orleans Railroad was an effort by John Evans to provide a railroad line south from Denver, through New Mexico and Texas, out to the Gulf of Mexico to deliver Colorado goods to eastern markets by steamers. Union Pacific saw the D&NO as an opportunity to connect Texas with the UP's then under construction transcontinental railroad. However, the effort was viewed with hostility by the Rio Grande and the Santa Fe lines, both of which traveled south from Denver. Obstructions by the Rio Grande and Santa Fe lines forced the D&NO into receivership in 1885. The line was eventually purchased by the UP backed Denver, Texas and Gulf Railroad (DT&G). Ultimately, Colorado was linked with the Gulf of Mexico.

Significance Assessment: This railroad was short-lived and was sold to the Denver, Texas & Gulf Railroad before it could make a rail connection between Denver and the Gulf of Mexico. While it was associated with John Evans, other Colorado railroads (particularly the Denver Pacific and the Denver, South Park & Pacific) have a stronger association with Evans under Criterion B. In terms of the impact on the growth and prosperity of Denver or other areas, the Denver & New Orleans is not as important as other railroads and much of the line in southeast Denver has been obliterated. The rail line is in its original location and the alignment and grade are original, but the tracks, ties, and associated material have all been replaced.

### **West & South Side Interceptor (5DV.10635.6)**

The West and South Side Interceptor was surveyed by Gail Keeley, Hermsen Consultants, as part of the Denver's Brick Sewers Historic Context project in 2012.

Description: Resource 5DV.10635.6 is a segment of the West and Southside Interceptor, a sanitary sewer that runs parallel to the South Platte River between 6<sup>th</sup> and 3<sup>rd</sup> Avenues, west of I-25. The entire sewer runs between Yale Avenue on the south end and W. 52<sup>nd</sup> Avenue on the north. Built in 1910, the brick-lined sewer pipe is 44" in diameter. It is still in use, as is another nearby sewer to the project area, the Platte River Interceptor, built during the 1970s, which is larger at 72 inches in diameter.

Historical Summary: The West and Southside Sewer served the south and west parts of the city, including neighborhoods east of the South Platte River between Alameda Ave., Colorado Blvd., and Yale Ave., and neighborhoods on the west side of the Platte between Alameda and extending to the north to the city limits at 52nd Ave (refer to attached map showing route of sewer), ending in the Globeville and Berkeley neighborhoods. Workmen dug the trenches for the sewer by hand, and built wooden patterns in which the brick-lined sewer was laid. The dimensions at the largest part of the sewer near Globeville measured as much as six feet in diameter.

Significance Assessment: Denver's earliest sewer sub-mains and mains were built of brick. Brick was the standard material for construction of sewer lines with a diameter larger than 24" from the 1880s until the mid 1930s. In 1909, the first concrete sewer line was built in Denver. The use of concrete increased after that time and by 1938, Denver was no longer using brick to build sewer lines. Today there are approximately 65 miles of brick sewer line remaining in operation in Denver of which 46 miles are storm sewer lines and 19 miles are sanitary sewer lines. The great majority of these lines are built of a single ring of bricks.

The West and South Side Interceptor has many of the original brick sections still in use. The sewer line between 3<sup>rd</sup> and 6<sup>th</sup> avenues was built with segments of line with a single ring of brick which was strengthened by an exterior casing of concrete ranging from 4" to 6" on the top of the line to 7 ¼" – 9 ¼" on the sides of the line. The single row of brick is typical construction for the majority of brick sewer lines in Denver.

The brick sewer line is representative of the construction techniques used for sewer line construction during the period of significance and is assessed as eligible for inclusion on the NRHP under Criterion D. The sewers themselves provide the important information about the sewer line design and construction techniques and will be useful in answering further research questions. It has been determined that the sewer lines are not important for preservation in place. The brick sewer lines are associated with the early development of Denver and demonstrate the techniques the city used during the period of significance from 1880 - 1937 for dealing with the removal and conveyance of sewage and storm water. For these reasons, Criterion D is the most appropriate criterion to apply to this important underground resource.

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## 7.0 CONCLUSIONS AND RECOMMENDATIONS

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Cultural resource investigations were conducted by FHU in April of 2012 for the proposed US-6 Bridge Reconstruction Project in the City and County of Denver. The project involved a Class I file search, several reconnaissance surveys of the proposed Area of Potential Effects, and a Class III intensive-level inventory of historical resources.

The file search revealed that the project area contains 23 previously recorded architectural properties and two linear resource surveys.

Felsburg, Holt Ullevig completed intensive-level documentation for 23 previously unrecorded historical resources including 17 historic buildings and 7 historic linear transportation features. None of the recorded sites were considered eligible for the NRHP.

Although no archaeological sites were identified in the project area, FHU recommends that construction personnel be made aware of the potential for buried archaeological features and artifacts. If such materials are encountered during construction, work should be temporarily halted until the discovery is evaluated by a qualified archaeologist.

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## 8.0 REFERENCES

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### **Books, newspapers, and other text documents**

City and County of Denver, Building Permits, 1950-1987.

Permits are found on microfiche at the Building Permits Department. Many permits from the 1950's and 1960's are missing and it is often difficult to determine the date of construction or date of major renovations and additions to buildings within this time period.

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Austin, Texas: Texas Department of Transportation.

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1995 *Denver Neighborhood History Project: Overview History of Denver  
Neighborhood Development*  
Prepared for the City and County of Denver, Denver Landmark Preservation  
Commission and the Office of Planning and Community Development.

Tatanka Historical Associates, Inc.

2007 *Federal Boulevard: Alameda Avenue to 6<sup>th</sup> Avenue*  
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*Valverde Neighborhood Plan*. City and County of Denver, Planning Office.

Historic Contexts from US6/Wadsworth EA and Federal PEL study

*FROM: Historic Resources Survey, US 6 and Wadsworth Boulevard, Lakewood, CO Draft  
Report, June 2008, pages 36-37*

1948 "Plans Made to Extend W. 6th Ave. Freeway." 16 December.  
*The Rocky Mountain News*, December 16, 1948.

1953 "Highway 6 Dedicated to GAR Across Nation."  
*The Rocky Mountain News*, May 4, 1953.

1957 "New 6th Ave. Bridge Opened."

*The Rocky Mountain News*, November 14, 1957.

### **Sanborn Fire Insurance Maps**

Fire insurance maps of Denver, Colorado - 1887 (updated 1950), and published in 1955 & 1965.

### **Websites**

COMPASS: Colorado's On-Line Cultural Resource Database  
(<http://oahp.historycolorado.org/compass/>)

Denver County Assessor's online real property database, searchable by address or parcel number (<http://www.denvergov.org/realproperty.asp>)

Denver Public Library – Creating Communities  
(<http://creatingcommunities.denverlibrary.org/>)

Pleasant Family Shopping: A Nostalgic look back at chain stores and other everyday places from the past. (<http://pleasantfamilyshopping.blogspot.com/2011/03/golden-age-of-gas-stations.html>)

The Piton Foundation - Community Facts and Neighborhood Summaries  
(<http://www.piton.org/index.cfm?fuseaction=CommunityFacts.NeighborhoodsList>)

## **Attachment 2**

Correspondence, April 10, 2012: CDOT to SHPO Revised Area of Potential Effect for Historic Survey within the 6<sup>th</sup> Avenue Corridor of the 1-25 Valley Highway Environmental Impact Statement Project

# STATE OF COLORADO

## DEPARTMENT OF TRANSPORTATION

Region 6, Planning and Environmental  
2000 South Holly Street  
Denver, CO 80222  
(303) 757-9929  
(303) 757-9036 FAX



April 10, 2012

Mr. Ed Nichols  
State Historic Preservation Officer  
Colorado Historical Society  
1200 Broadway  
Denver, CO 80202

RE: Revised Area of Potential Effect for Historic Survey within the 6<sup>th</sup> Avenue Corridor of the I-25 Valley Highway Environmental Impact Statement Project

Dear Mr. Nichols:

On behalf of the Federal Highway Administration (FHWA), the Colorado Department of Transportation (CDOT) is requesting comments from the State Historic Preservation Officer (SHPO) and Section 106 consulting parties on a revised Area of Potential Effect for improvements to the 6<sup>th</sup> Avenue Freeway within the Valley Highway Environmental Impact Statement (EIS) (November 2006) and phased Record of Decision (ROD) (July 2007). This project will provide some of the improvements outlined in the 2007 ROD, and will also incorporate some items that were identified in the 2006 EIS but not included in the 2007 ROD; this will require a that a new phased ROD be developed and signed. As part of that process CDOT is re-evaluating the design and impacts using the most up-to-date data.

The project will be constructed as a design-build contract and will implement the Preferred Alternative for the US 6 portion of the Valley Highway EIS. The project will correct functional deficiencies along I-25 and US 6 to meet current design standards and to provide a safer, more efficient, and more reliable transportation system. The project limits include the 6<sup>th</sup> Avenue highway between Knox Court on the west and the BNSF Railroad Bridge on the east. It includes the following elements:

- Ramp improvements at the I-25/US 6 interchange.
- Improvements to I-25 include a designated collector/distributor road that will direct northbound traffic on I-25 to either east or west bound US Highway 6 from the east side of the interstate. This collector/distributor road might also be extended to the 8<sup>th</sup> Avenue interchange (see Figure 1). These improvements will not result in any changes or modifications to the structures that carry I-25 over a railroad spur (F-16-EG) or 8<sup>th</sup> Ave. (F-16-DX). In addition, the vertical profile of I-25 will be lowered by several feet in the vicinity of the 6<sup>th</sup> Avenue Bridge to account for additional overhead clearances of traffic underneath the bridge.
- The on-ramp from Federal Blvd to eastbound US 6 will be relocated from its present location south of Barnum East Park to the north side of Barnum East Park. The park will be reconstructed to accommodate this change. This will result in a more standard diamond interchange at US 6/Federal Blvd. As a result, 5<sup>th</sup> Avenue will convert to a two-way street east of Federal Boulevard.
- Construction of a bicycle/pedestrian bridge over US 6, west of Federal Boulevard, to connect Barnum East Park (which is east of the highway between 5<sup>th</sup> and 6<sup>th</sup> avenues.) and Barnum North Park (which is north of 6<sup>th</sup> and west of Federal ).
- Closure of the eastbound US 6 off-ramp to Bryant Street. Reconfiguration of the eastbound US 6 on-ramp from Bryant and the westbound US 6 off ramp to Bryant.

- A permanent water quality pond (the location is a vacant parcel north of US 6 between Canosa and Decatur streets).
- A cul-de-sac on Canosa Street will be constructed to terminate on the north side of 6<sup>th</sup> Avenue to accommodate the ramps and collector-distributor road.

The project will replace five bridges along US 6. Of the five bridges, three were included in the Section 106 consultation for the Valley Highway EIS. Two others were not and require determinations of eligibility and effect. The five bridges are:

Bridge Name/Number	Site No.	Date of Construction	Results of Valley Highway EIS consultation
US 6 over Federal/F-16-EK	5DV7083	1958	NA
US 6 over Bryant Street/F-16-EN	5DV7085	1958	Officially not eligible/no historic properties affected
US 6 over the South Platte River/F-16-EF	5DV7080	1956	Officially not eligible/no historic properties affected
US 6 over the Burlington Northern Santa Fe (BNSF) Railroad east of I-25/F-16-EJ	5DV7082	1956	NA
US 6 over I-25/F-16-DU	5DV7076	1958	Officially not eligible/no historic properties affected

While the Federal Bridge replacement was included in the 2007 ROD, Section 106 consultation never took place on this resource. CDOT will prepare an eligibility and effects determination for this bridge as part of this project.

The Area of Potential Effect for this phase of the project has been revised because more is known about the project design at this time. In addition, the methodology of defining an APE has changed since 2004 as described in an attachment to the 2010 Programmatic Agreement among FHWA, the Advisory Council on Historic Preservation, the Colorado State Historic Preservation Officer, and CDOT.

Consultation with your office on the APE initially took place in 2004. At that time, the APE was delineated to encompass all properties potentially subject to impacts from the Valley Highway Project. The APE (see **Figure 1**) was defined as a line located 1000 feet from, and parallel to, the perimeter encompassing the design alternatives. All properties meeting the minimum age requirement (45 years) transected by the APE line were evaluated. In addition, although there is no record of this, several properties outside of the APE were also evaluated based on the age of the structures.

CDOT will survey all properties within the APE meeting the minimum age requirement (45 years) for structures built in or before 1967. These parcels are outlined in purple and dark blue in **Figure 1**.

These are the basic differences between the original APE for the EIS and the revised APE for the current project:

1. On the west end of the project, the APE was narrowed to the 6<sup>th</sup> Avenue roadway between Federal Blvd and Knox Court because the only work that will take place in this section is pavement overlay of the existing lanes. There is no work planned outside of existing ROW and no widening or new lanes will be added in this section.
2. The APE south of Barnum East Park includes the properties on Short Place because there are temporary easements planned for the northern edge of these properties where they back up to West 5<sup>th</sup> Ave. There is a potential for direct and indirect effects from noise and visual effects.

3. The finger of the APE on the north side east of Federal (at what should be Decatur Street) was initially drawn because engineers were looking at connecting Decatur Street through these parcels. This is no longer going to happen, so the APE was revised in this location.
4. The APE on Federal between 6<sup>th</sup> and 7<sup>th</sup> includes the total acquisition of the parcel on the southeast corner of 7th and Federal. The parcel to the north of this is within the APE to assess whether any indirect effects might occur, although direct effects are not anticipated at this time. The APE ends south of 7<sup>th</sup> Avenue because no project improvements will take place north of 7<sup>th</sup>.
5. The APE north and south of 6<sup>th</sup> Avenue follows the parcel boundary lines for the properties next to US 6. While there will be small property easements and acquisitions from these properties for the slip ramps, and potential audible and visual effects, no total acquisitions (i.e., demolishing of buildings) are expected for the parcels directly adjacent to US6. There is very little chance for indirect effects to parcels on the other side of the parcels that are in the first row because the buildings will still remain in their original location. So only the first row of parcels on either side of US6 was included between Decatur and Alcott to assess potential indirect and direct effects.
6. On the east end, the bridge that carries US 6 over the BNSF railroad is the eastern edge of the project. The railroad grades are included within the APE, but there are no known property acquisitions or easements at this time for the properties on the southeast or northeast quadrants of US 6 and this bridge. There are potential sliver acquisitions and easements for the properties that are north of the ramp that connects westbound US 6 to northbound I-25, so the first row of properties will be surveyed. No buildings will be acquired for the ramp improvements.
7. The 8<sup>th</sup> Avenue ramp improvements will be located west of or behind the buildings at 8<sup>th</sup> and Vallejo, so the parcels with structures built in 1967 or later on the west side of this street will be surveyed. These are shown in blue on the attached Figure 1.

This revised Section 106 APE consultation is also being copied to the City of Denver Preservation Landmark Commission as a potential Section 106 consulting party. If they choose to become a consulting party and we receive their comments on these findings, we will forward them to you. Please provide any comments, questions, or concerns to Dianna Litvak at (303) 757-9461 or [Dianna.litvak@dot.state.co.us](mailto:Dianna.litvak@dot.state.co.us).

Sincerely,



Elizabeth Kemp-Herrera  
Region 6 Planning and Environmental Manager

cc: Jordan Rudel, CDOT Region 6  
Stephanie Gibson, FHWA  
George Gause, City of Denver Landmark Preservation Commission

Attachments: Figure 1, Revised Area of Potential Effect

## **Attachment 3**

Correspondence, June 22, 2012: CDOT to SHPO Regarding: Eligibility

# STATE OF COLORADO

## DEPARTMENT OF TRANSPORTATION

Region 6, Planning and Environmental  
2000 South Holly Street  
Denver, CO 80222  
(303) 757-9929  
(303) 757-9036 FAX



June 22, 2012

Mr. Ed Nichols  
State Historic Preservation Officer  
Colorado Historical Society  
1200 Broadway  
Denver, CO 80202

**SUBJECT:** Determinations of Eligibility within the 6<sup>th</sup> Avenue Corridor of the I-25 Valley Highway Environmental Impact Statement Project (CDOT Subaccount 18838; CHS #40477)

Dear Mr. Nichols:

On behalf of the Federal Highway Administration (FHWA), the Colorado Department of Transportation (CDOT) is requesting comments from the State Historic Preservation Officer (SHPO) on the Section 106 determinations of eligibility for historic properties within the revised Area of Potential Effect for the 6<sup>th</sup> Avenue Freeway phase of the Valley Highway Environmental Impact Statement (EIS) (November 2006) and phased Record of Decision (ROD) (July 2007). We will follow up with determinations of effect in later correspondence after we have consulted on eligibility assessments.

Your office responded to CDOT's request for comments on the Area of Potential Effect (APE) in correspondence dated April 18, 2012, and did not object to CDOT's APE. In correspondence dated April 26, 2012, the City of Denver Landmark Commission staff concurred with the APE and also stated the city did not want to be a consulting party under Section 106 (letter attached).

Properties were surveyed in three phases for this project and survey forms completed by Jason Marmor, Dianna Litvak, CDOT Region 6, and Jake Lloyd, architectural historian at FHU. The enclosed survey report was completed by Jake Lloyd. In addition, the West and Southside Interceptor (Metro Wastewater sanitary sewer) was surveyed by Gail Keeley of Hermsen Consultants as part of a research project on the history of Denver's remaining brick-lined sewers.

### Eligibility Determinations

Dianna Litvak consulted Compass on June 11, 2012, and a file search was conducted for this project by Ms. Litvak and Mr. Lloyd in April and May 2012. Detailed results of the file search can be found in the attached survey report.

**Discussion of NRHP-eligible bridge assessments:** Eligibility assessments in Compass do not reflect SHPO's official determinations of eligibility for bridge structures that were first consulted on as part of the 2000 Colorado Historic Bridge Inventory, and found to be *officially not eligible* by SHPO in 2002. In addition, these structures were referred to as *officially not eligible* in the Cultural Resources Inventory for the Valley Highway EIS in 2004. These structures include 5DV.7076 (US Highway 6 and I-25); 5DV.7085 (US 6 overpass at Bryant), and 5DV.7080 (US 6 overpass at South Platte River). In Compass, these structures are assessed as *not eligible-field*.

In addition, two other bridge structures were not included in the Valley Highway EIS project but are part of the current project for US Highway 6 improvements. These structures were also initially assessed as part of the 2000 Colorado

Historic Bridge Inventory. These structures are 5DV.7083 (US 6 underpass at Federal), and 5DV.7082 (US 6 overpass at BNSF). They also are assessed in Compass as *not eligible-field*.

CDOT and SHPO have been operating under the following methodology for bridge eligibility assessments while the 2010 Historic Bridge Inventory is in the process of being completed. If a bridge was assessed as *not eligible-field* in 2000 as part of the historic bridge inventory in that year, SHPO officially concurred with the determination in 2002 and the bridge does not need to be re-evaluated. If a bridge was assessed as *possibly eligible* in 2000, and SHPO did not subsequently determine whether the bridge does or does not meet NR criteria, CDOT re-evaluates it using a historic bridge inventory form. According to this methodology, four of the six bridges within the current APE should be considered *officially not eligible* (see table below). Only one bridge that is part of the current project must be re-evaluated: 5DV.7083, the overpass at Federal because it was evaluated as *possibly eligible* in 2000. In addition, 5DV7084 (US 6 underpass at Knox) was evaluated as *possibly eligible* in 2000. That bridge is within the Area of Potential Effect for the current project, but no work will be done to it except for an overlay of US 6 underneath the bridge. The final eligibility assessment for the Knox Court underpass will be done as part of TranSystems historic bridge inventory.

The following tables include the eligibility assessments of resources that were previously recorded and re-evaluated as part of this survey, and those that were recorded as part of this survey. The first table is for previously recorded resources within the APE; site forms are attached for all of these resources. The second table is for newly recorded resources within the APE. For more detail on the eligibility assessments of newly recorded resources, please refer to the Cultural Resources Inventory Report for the US 6 Bridge Reconstruction (attached).

In addition, the original Cultural Resources Inventory for the Valley Highway EIS, completed in 2004, inventoried fourteen historic buildings and four linear sites within the current APE. All of the buildings were assessed as *officially not eligible* based on consultations that took place on the survey in 2004 and do not require re-evaluations unless the structures were not built 50 or more years ago in 2004. Three such structures were re-evaluated as part of the current survey. In addition, two other structures were initially evaluated as part of other surveys and were also re-evaluated in this survey.

#### Previously Recorded Cultural Resources within APE

Site No.	Site ID	Site Type	NRHP-Eligibility	Date Eval.	Survey Completed By	Remarks
<b>Historic Bridges</b>						
5DV7076	US-6, Underpass at I-25	Historic Bridge	Not Eligible-Official	2002	Fraser Design	Compass assessment is <i>not eligible-field</i>
5DV7080	US-6, S. Platte River Bridge	Historic Bridge	Not Eligible-Official	2002	Fraser Design	Compass assessment is <i>not eligible-field</i>
5DV7082	US 6, Overpass at BNSF	Historic Bridge	Not Eligible	2002	Fraser Design	Compass assessment is <i>not eligible-field</i>
5DV7083	US-6, Overpass at Federal	Historic Bridge	Not Eligible-Field	2002 & 2012	Fraser Design and Jason Marmor	Re-evaluated <i>not eligible</i> in Feb. 2012
5DV7084	Knox Court Underpass	Historic Bridge	Not Eligible-Field	2002	Fraser Design	Not re-evaluated as part of this project

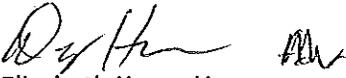
Site No.	Site ID	Site Type	NRHP-Eligibility	Date Eval.	Survey Completed By	Remarks
5DV7085	US-6, Bryant Street Overpass	Historic Bridge	Not Eligible-Official	2002	Fraser Design	Compass assessment is <i>not eligible-field</i>
<b>Historic Buildings and Structures</b>						
5DV.5134	2214 West 8 <sup>th</sup> Ave.	Commercial	Officially Eligible	1996 & 2012	Hermesen Consultants and FHU	Re-evaluated as eligible in June 2012
5DV.8325	601 Bryant Street	Commercial	Not Eligible	2004, 2012	2004-FHU 2012-FHU	Re-evaluated <i>not eligible</i> in April 2012
5DV.9065	499 Federal Blvd.	Commercial	Not Eligible--Official	2004, 2012	2004-FHU 2012-Jason Marmor	Re-evaluated <i>not eligible</i> in April 2012
5DV.9848	450 Federal Boulevard	Commercial	Not Eligible-Officially	2007, 2012	2007-Tatanka Historical Associates 2012-FHU	Re-evaluated <i>not eligible</i> in April 2012
<b>Historical Linear Sites</b>						
5DV.4783.3	Atchison, Topeka & Santa Fe	Transportation-Railroad	Non-contributing segment of officially eligible resource	2004	FHU	Segment not re-evaluated; CDOT agrees with official determination. Recorded 5DV.4783.5 (see below)
5DV.6033.14	Valley Highway	Transportation-Highway	Not Eligible-Officially	2004	FHU	Not re-evaluated, resource is not NRHP eligible
5DV.6243.2	Denver, South Park & Pacific R.R.	Transportation-Railroad	Non-contributing segment of officially eligible resource	2004	FHU	Segment not re-evaluated; CDOT agrees with official determination. Recorded 5DV.6243.8 (see below)
5DV9105.2	Denver & New Orleans Railroad	Transportation-Railroad	Not Eligible--Officially	2004	FHU	Segment not re-evaluated; CDOT agrees with official determination. Recorded 5DV.9105.4 (see below)

**Newly Recorded Cultural Resources within APE**

Site No.	Site ID	Site Type	NRHP-Eligibility	Date Evaluated	Survey Completed By	Contrib. to NRHP District?
<b>Historical Linear Sites</b>						
5DV.3512.4	Denver West Side Line	Linear-Railroad	Non-contributing segment of officially eligible resource	2012	D. Litvak	No
5DV.4783.5	Atchison, Topeka & Santa Fe	Linear-Railroad	Non-contributing segment of officially eligible resource	2012	D. Litvak	No
5DV.6243.8	Denver, South Park & Pacific	Linear-Railroad	Non-contributing segment of officially eligible resource	2012	D. Litvak	No
5DV.9105.4	Denver & New Orleans	Linear-Railroad	Not Eligible--field	2012	D. Litvak	No
5DV.10635.6	West & South Side Interceptor	Linear-Sewer	Contributing segment of field eligible resource (Criterion D)	2012	G. Keeley	Yes--brick-lined sewer district
5DV.11289.1	US Highway 6	Linear--Highway	Non-contributing segment of officially eligible resource	2012	D. Litvak	No
<b>Historic Buildings and Structures</b>						
5DV.11256	620 Federal Boulevard	Commercial	Not Eligible--Field	2012	J. Marmor	No
5DV.11260	690 Federal Boulevard	Commercial	Not Eligible--Field	2012	FHU	No
5DV.11261	2627 West 6 <sup>th</sup> Avenue	Commercial	Not Eligible--Field	2012	FHU	No
5DV.11262	2525 West 6 <sup>th</sup> Avenue	Commercial	Not Eligible--Field	2012	FHU	No
5DV.11263	781 Vallejo Street	Commercial	Not Eligible--Field	2012	FHU	No
5DV.11264	745 Vallejo Street	Commercial	Not Eligible--Field	2012	FHU	No
5DV.11265	2120 West 7 <sup>th</sup> Avenue	Commercial	Not Eligible--Field	2012	FHU	No
5DV.11266	2050 West 7 <sup>th</sup> Avenue	Commercial	Not Eligible--Field	2012	FHU	No
5DV.11267	2038 West 7 <sup>th</sup> Avenue	Commercial	Not Eligible--Field	2012	FHU	No
5DV.11268	535 Alcott Street	Commercial	Not Eligible--Field	2012	FHU	No
5DV.11269	516 Bryant Street	Commercial	Not Eligible--Field	2012	FHU	No
5DV.11270	543 Bryant Street	Commercial	Not Eligible--Field	2012	FHU	No
5DV.11271	505 Bryant Street	Commercial	Not Eligible--Field	2012	FHU	No
5DV.11272	525 Bryant Street	Commercial	Not Eligible--Field	2012	FHU	No
5DV.11273	2650 West 6 <sup>th</sup> Avenue	Commercial	Not Eligible--Field	2012	FHU	No
5DV.11274	2700 West 6 <sup>th</sup> Avenue	Commercial	Not Eligible--Field	2012	FHU	No
5DV.11275	2947 West Short Place	Commercial	Not Eligible--Field	2012	FHU	No

We hereby request your concurrence with these determinations of eligibility. Your response is necessary for the Federal Highway Administration's compliance with Section 106 of the National Historic Preservation Act and the Advisory Council on Historic Preservation's regulations. Please provide any comments, questions, or concerns to Dianna Litvak at (303) 757-9461 or [Dianna.litvak@dot.state.co.us](mailto:Dianna.litvak@dot.state.co.us).

Sincerely,

*for* 

Elizabeth Kemp-Herrera  
Region 6 Planning and Environmental Manager

cc: Jordan Rudel, CDOT Region 6  
Stephanie Gibson, FHWA

Attachments: Letter from CCD on consulting party status  
Cultural Resources Inventory Report for the US6 Bridges Reconstruction Project, Phases 1 and 5 of the  
Valley Highway EIS  
Site Forms

## **Attachment 4**

Correspondence, August 2, 2012: CDOT to SHPO Regarding: Effects

# STATE OF COLORADO

## DEPARTMENT OF TRANSPORTATION

Region 6, Planning and Environmental  
2000 South Holly Street  
Denver, CO 80222  
(303) 757-9929  
(303) 757-9036 FAX



August 2, 2012

Mr. Ed Nichols  
State Historic Preservation Officer  
Colorado Historical Society  
1200 Broadway  
Denver, CO 80202

- SUBJECT:**
- Section 106 Determinations of Effect within the 6<sup>th</sup> Avenue Corridor of the I-25 Valley Highway Environmental Impact Statement Project (CDOT Subaccount Nos. 18838, 18202, and **18192 [overall project number]**; CHS #40477)
  - Notification of Section 4(f) net benefits evaluation and request for SHPO comment

Dear Mr. Nichols:

On behalf of the Federal Highway Administration (FHWA), the Colorado Department of Transportation (CDOT) is requesting comments from the State Historic Preservation Officer (SHPO) on Section 106 determinations of effect for historic properties within the revised Area of Potential Effect for the 6<sup>th</sup> Avenue Freeway phase of the Valley Highway Environmental Impact Statement (EIS) (November 2006) and phased Record of Decision (ROD) (July 2007).

Your office responded to CDOT's request for comments on National Register of Historic Places eligibility determinations in correspondence dated June 29, 2012. You requested additional information on the NRHP eligibility of the Valley Highway, 5DV.6033, and that has been included in this letter. You agreed with CDOT's determinations of eligibility for newly surveyed and previously surveyed properties, clarified the *not eligible* assessment for the overall resource, 5DV.9105 (the Denver & New Orleans Railway), and explained that linear segments should be referred to as "supporting" or "non-supporting" of the eligibility of the overall resource. We have noted these clarifications.

Effects to individual properties (not part of a larger resource) that have been determined to be not eligible to the NRHP have not been included in detail in this correspondence. The resulting Section 106 determinations of effect for these resources will be *no historic properties affected*. Proposed impacts to segments of linear resources that have been determined to be eligible to the NRHP (with either supporting or not supporting segments) have been described in detail and CDOT prepared Section 106 determinations of effect for these resources.

### **Project Description**

CDOT will issue a design-build contract to replace five bridges on US 6 and redesign US Highway 6 between the BNSF and Federal Blvd to correct safety deficiencies. The entrance ramp from Federal to eastbound US 6 and I-25 (including the Bryant Street interchange) is currently one of the most hazardous sections of highway in the state and the Denver Regional Council of Governments and CDOT have identified this area as a "bottleneck" location.

Under the current schedule, CDOT plans to address the additions to the project in a new Record of Decision in fall 2012 and award a design-build contract in early winter 2013. Because this is a design/build project, the contractor may propose additional improvements, including new right of way acquisitions or easements for potentially historic properties that had not been previously consulted upon in the Section 106 process. If this occurs, the contractor will be required to submit these changes to CDOT and reopen consultation with SHPO under Section 106, and under Section 4(f), if required by project circumstances.

The project description in the correspondence to your office on April 10, 2012 remains the same except for small changes as follows.

- Federal Blvd at 7<sup>th</sup> Ave: Initially project improvements did not extend north of the intersection of 7<sup>th</sup> and Federal, but engineers determined there will be a temporary easement on the northeast corner of Federal and 7<sup>th</sup>. This parcel (710 Federal), consists of a building that was built in 1980 and does not meet the age criteria to be surveyed as a potential historic resource.
- Modifications to the exit ramp from northbound I-25 to 8<sup>th</sup> Ave, to incorporate the ramp into a collector/distributor road on the east side of I-25, will remain within the existing ROW.

### **Valley Highway Eligibility, 5DV.6033.14**

Consultation regarding the eligibility determination for the Valley Highway, 5DV6033, first took place in 1999 and 2000 as part of the Southeast Corridor Improvements. This project included the widening of I-25 and construction of the light rail line on I-25 between Broadway to Lincoln Ave. in Douglas County, and I-225 from I-25 to Parker Road (commonly referred to as TREX). At the time of the cultural resource survey for this project, no site form was prepared for 5DV6033, but point numbers were given to the original Valley Highway bridges within the project area. SHPO and CDOT agreed that major changes had obscured the original highway between 52<sup>nd</sup> Avenue and Evans Avenue to the extent that it did not retain integrity and could no longer convey significance to be considered eligible for listing on the National Register. The highway was determined to meet the criteria for the State Register, however. In correspondence dated February 12 and 19, 2004 SHPO and CDOT agreed upon the same approach for the 5DV6033 as part of the Valley Highway EIS consultation. CDOT upholds the determination that the resource is eligible for the State Register, but not the National Register.

**Table 1: Section 106 Effect Determinations**

Site No.	Site ID	Site Type	NRHP-Eligibility	Section 106 Determination of Adverse Effect	Remarks
<b>Historic Buildings and Structures</b>					
5DV.5134	2214 West 8 <sup>th</sup> Ave.	Commercial	Officially Eligible	No Historic Properties Affected	
<b>Historical Linear Sites</b>					
5DV.3512.4	Denver West Side Line	Linear-Railroad	Non-contributing segment of officially eligible resource	No Historic Properties Affected	Property is outside of proposed improvements
5DV.4783.3	Atchison, Topeka & Santa Fe	Transportation-Railroad	Non-contributing segment of officially eligible resource	No Adverse Effect	
5DV.4783.5	Atchison, Topeka & Santa Fe	Linear-Railroad	Non-contributing segment of officially eligible resource	No Adverse Effect	
5DV.6243.2	Denver, South Park & Pacific R.R.	Transportation-Railroad	Non-contributing segment of officially eligible resource	No Adverse Effect	
5DV.6243.8	Denver, South Park & Pacific	Linear-Railroad	Non-contributing segment of officially eligible resource	No Adverse Effect	
5DV.10635.6	West & South Side Interceptor	Linear-Sewer	Contributing segment of field eligible resource (Criterion D)	Adverse Effect	Adverse effect will be mitigated as part of the PA for Denver brick-lined sewers
5DV.11289.1	US Highway 6	Linear--Highway	Non-contributing segment of officially eligible resource	No Adverse Effect	

**Effects Determinations**

**5DV.5134: 2214 West 8<sup>th</sup> Ave.**

The ramp behind this property that carries traffic from northbound I-25 to eastbound 8<sup>th</sup> Avenue might be modified as part of a new collector/distributor road, but all of the work will remain within existing ROW. There will be no direct impact to the property. Indirect changes in setting are minor. The setting of the gas station, which once served a largely residential area, has already changed radically as this area has become more industrial. No major improvements in capacity are anticipated, but the location of the ramp might be moved slightly within ROW. The Section 106 determination of effect is *no historic properties affected* because the ramp improvements represent very little change from the current conditions and will not have a direct or indirect effect on any of the characteristics that make the property eligible to the NRHP.

### 5DV3512: Denver West Side Line RR

The replacement of the South Platte River Bridge will take place near this resource. This segment does not support the eligibility of the overall resource. Please refer to Attachment 3 for more details. On the north side of the bridge, the tracks have been removed and very little remains of the grade. On the south side, the tracks begin approximately 200 feet south of the ramp that carries eastbound US 6 traffic to north or southbound I-25. There is no work planned on the ramp, just the replacement of the bridge. The Section 106 determination of effect is *no historic properties affected*.

### 5DV.4783: Atchison, Topeka, Santa Fe and 5DV6243 Denver, South Park & Pacific

Three historical lines are consolidated under BNSF ownership in the eastern part of the APE. From west to east, the lines are the Denver, South Park & Pacific, the Denver & New Orleans Railway, and the Atchison, Topeka, Santa Fe. Two lines are eligible for the National Register of Historic Places (DSP&P and ATSF) while the Denver & New Orleans Railway is not eligible to the NRHP. Please refer to the attached graphics (Attachments 1 and 2) for more detail.

The existing bridge (F-16-EJ or 5DV.7082) over the BNSF tracks will be replaced by a longer two-span bridge within CDOT's existing easement over the BNSF tracks. There are currently two bridge piers within the railroad ROW, as shown in Attachment 1. The proposed bridge is 34.5 feet longer (159.53') than the existing bridge (124.95'). Both proposed abutments will be outside of existing BNSF right of way. Although the bridge will be slightly wider than the existing (required for phasing of traffic), the north/south limits of the proposed bridge are still within the current easement that CDOT has over the railroad. One new pier will be built within the ROW on the east side of the tracks, and it is approximately 17 feet east of the existing pier (5DV.4783, former ATSF). This makes the new pier at least 25 feet east of Siding Track 2, as required by the railroad's "Grade Separation Guidelines."

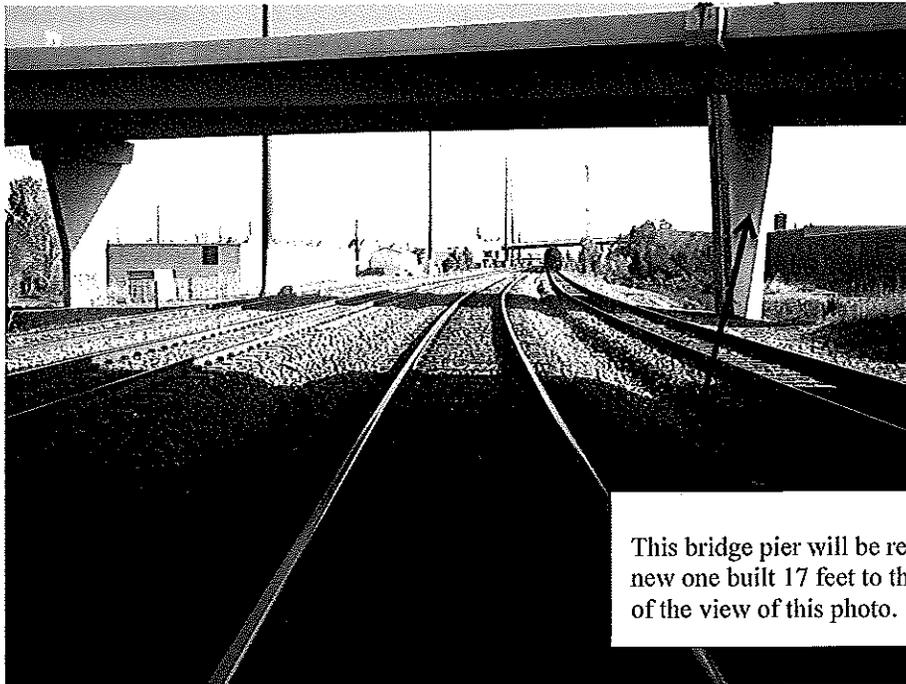


Figure 1; Current bridge (F-16-EJ) over the BNSF that will be replaced. From left to right, the historic railroad lines are Denver, South Park & Pacific (5DV6243), Denver & New Orleans (5DV9105), and Atchison, Topeka, Santa Fe (5DV.4783). The fourth track on the far right side is a small section of siding. View is to north.

This bridge pier will be removed and a new one built 17 feet to the east, outside of the view of this photo.

The existing west abutment and foundation will be removed. Based on preliminary design, the proposed west abutment and soil nail wall type combination will be constructed within CDOT's existing ROW. Please refer to the section view of Attachment 2 for more details.

BNSF has reviewed and provided comments on the bridge design. The railroad does not have any plans for additional tracks or geometric adjustments to the existing tracks. The BNSF requested adequate clearance on the west edge of the railroad tracks for a maintenance road, next to Siding Track 1 (5DV.6243, the former Denver, South Park & Pacific tracks). BNSF has confirmed that the new bridge meets the vertical clearance requirements in the guidelines. The current easement on US Highway 6 for the BNSF overpass that CDOT holds with the BNSF is depicted on the attached graphics.

The segments of the two NRHP-eligible railroads do not support the eligibility of the overall resource due to substantial changes in the historic setting. The placement of a new pier within the railroad ROW will not change or modify any of the characteristics that make the railroads eligible to the NRHP. No historical features of the railroads will be disturbed by this action as the pier will be built in an area that is currently part of the grade and there are no other objects that will be removed. CDOT has determined that this action will result in the Section 106 finding of *no adverse effect* for 5DV.4783 and 5DV.6243. A Section 106 effect description was not done for the D&NO because the resource is not eligible to the NRHP, therefore the resulting effect for this resource is *no historic properties affected*.

#### **5DV.10635.6, West and Southside Interceptor:**

The construction of a new bridge over the South Platte River will require 240 feet of this segment of the West and Southside Interceptor to be relocated. This brick-lined sewer segment under the bridge could possibly sustain damage due to the amount of pile driving and drilling that will take place on the west side of the bridge, so engineers have determined it is a better idea to relocate the affected portion. The 240-foot section will be removed and replaced with a new concrete pipe. Please refer to Attachment 3 for more details.

5DV10635.6 is a 2401' segment of the large West and Southside Interceptor, a sanitary sewer that extends from Rocky Mountain Lake in Berkeley to the South Platte River and University Park in southeast Denver. The entire sewer is approximately 129,000 linear feet (about 24 miles). About 39,000 linear feet (about 7 miles) was constructed in brick, while 89,731 linear (17 miles) feet was constructed in concrete pipe.

A large amount of the original brick sewer of this interceptor is still in operation today. The minor amount that will be relocated due to the bridge construction is .1 percent of the segment between 3<sup>rd</sup> and 6<sup>th</sup> avenues, and a much smaller portion of the larger system. The removal of such a small section, especially in light of the overall length of the resource, will not dramatically change the integrity of the resource and does not change or modify the characteristics that make the resource NRHP-eligible. However, 800.5(a)(2)(i) states that physical destruction of or damage to all or part of the property constitutes an adverse effect. As such, CDOT finds that the work to the resource will result in the Section 106 finding of *adverse effect*.

Consultation to mitigate the adverse effect to this resource will be formalized with the development and execution of a Programmatic Agreement between SHPO, FHWA, the Advisory Council, City and County of Denver, Metro Wastewater, and CDOT regarding brick-lined sewers in the City and County of Denver. Work on this draft agreement will begin in August 2012 between the agencies. Creative mitigation for

the adverse effect has already been completed and consists of a detailed historic context recently prepared by Gail Keeley on the history of Denver's brick sewers.

#### **5DV.11289, US Highway 6**

The project will correct functional deficiencies along I-25 and US 6 to meet current design standards and to provide a safer, more efficient, and more reliable transportation system. The footprint of US Highway 6 will widen slightly, but the overall number of lanes will remain the same. This widening will take place within a segment that does not support the eligibility of the overall resource. It will not alter any of the characteristics that make the resource eligible to the NRHP. The work will not physically destroy any of the resource. As such, CDOT has determined the work will result in *No Adverse Effect* to 5DV.11289.

#### **Notification of Net Benefits Evaluation**

FHWA intends to evaluate the adverse effects to the West and Southside Interceptor as part of the programmatic Section 4(f) Evaluation and Approval for Transportation Projects That Have a Net Benefit to a Section 4(f) property. The 4(f) evaluation requires coordination with the official with jurisdiction over the Section 4(f) property to agree in writing with the assessment of the impacts; the proposed measures to minimize harm; the mitigation necessary to preserve, rehabilitate, and enhance those features and values of the Section 4(f) property; and that such measures will result in a net benefit to the Section 4(f) property.

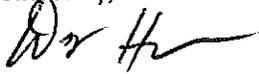
CDOT has determined that preserving the sewer line in place is not prudent due to the potential for impacts to the line due to vibration and pile driving caused by the construction of the South Platte River Bridge. Measures to minimize harm include limiting the amount of sewer that is replaced to the smallest amount necessary, which has been calculated as 240 feet of the 44" brick-lined segment at this location. FHWA has determined that more can be learned about the brick-lined sewer system in Denver through creative mitigation of the adverse effect. As mentioned above, CDOT prepared an in-depth report on the history of the development of Denver's brick-lined sewers and is in the process of finalizing a draft Programmatic Agreement for brick-lined sewers in Denver. These measures have resulted in a net benefit by enhancing understanding of the historical development of Denver's brick-lined sewer lines.

Please respond to this notification of net benefits finding, and note specifically that you understand this adverse effect will be mitigated in the future with the execution of the Denver brick-lined sewers Programmatic Agreement, anticipated for signature by October 2012. Please also comment on the assessment of impacts; measures to minimize harm; the creative mitigation that has already been prepared to mitigate adverse effects to the sewer system, and whether your office agrees with the net benefit finding.

We request your concurrence with these determinations of effects and the Net Benefits Evaluation. Your response is necessary for the Federal Highway Administration's compliance with Section 106 of the National Historic Preservation Act (as amended) and with the Advisory Council on Historic Preservation's regulations.

Thank you in advance for your prompt attention to this matter. If you require additional information, please contact Dianna Litvak at (303) 757-9461.

Sincerely,

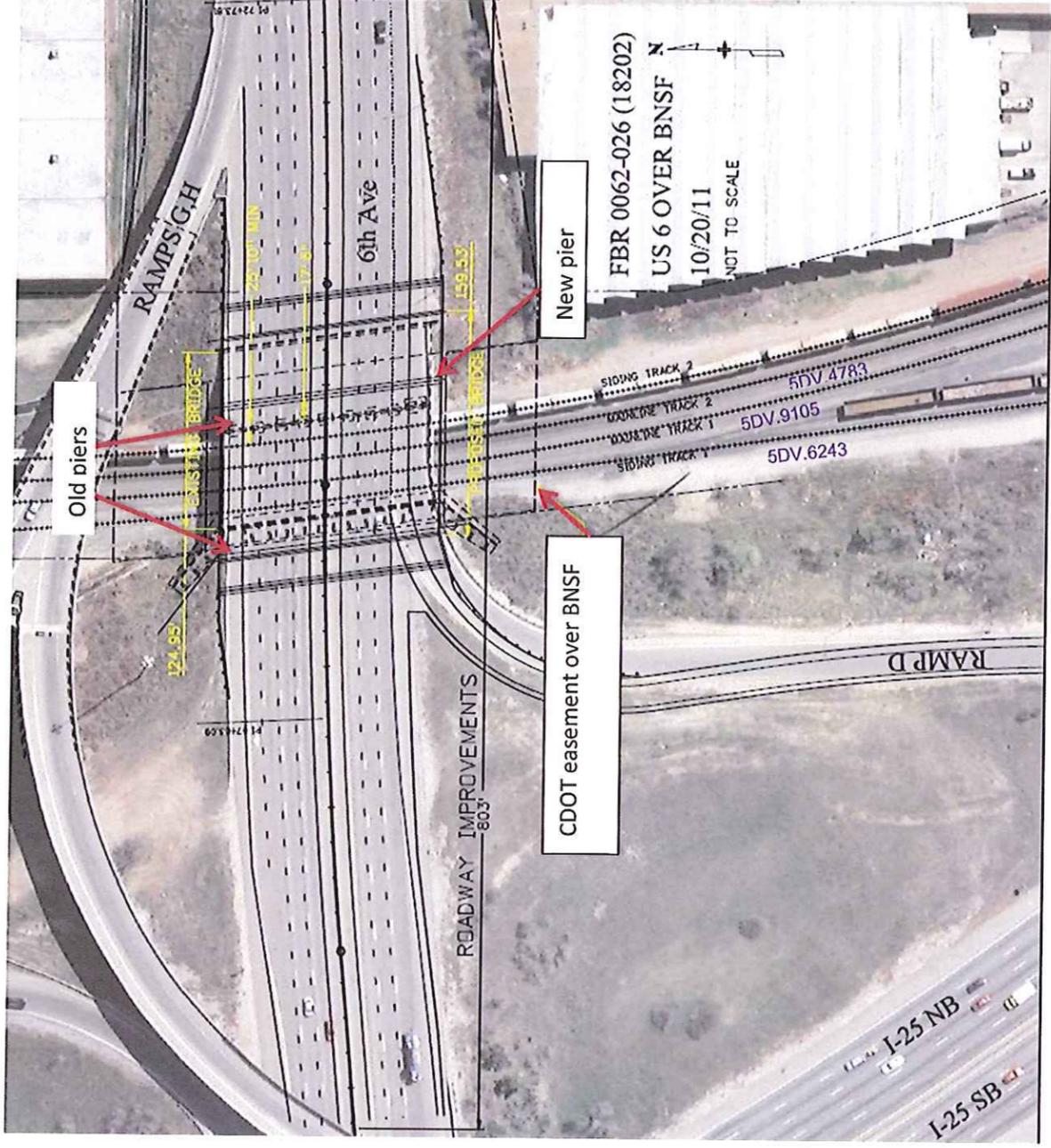


for Elizabeth Kemp-Herrera  
Region 6 Planning and Environmental Manager

cc: Jordan Rudel, CDOT Region 6  
Stephanie Gibson, FHWA

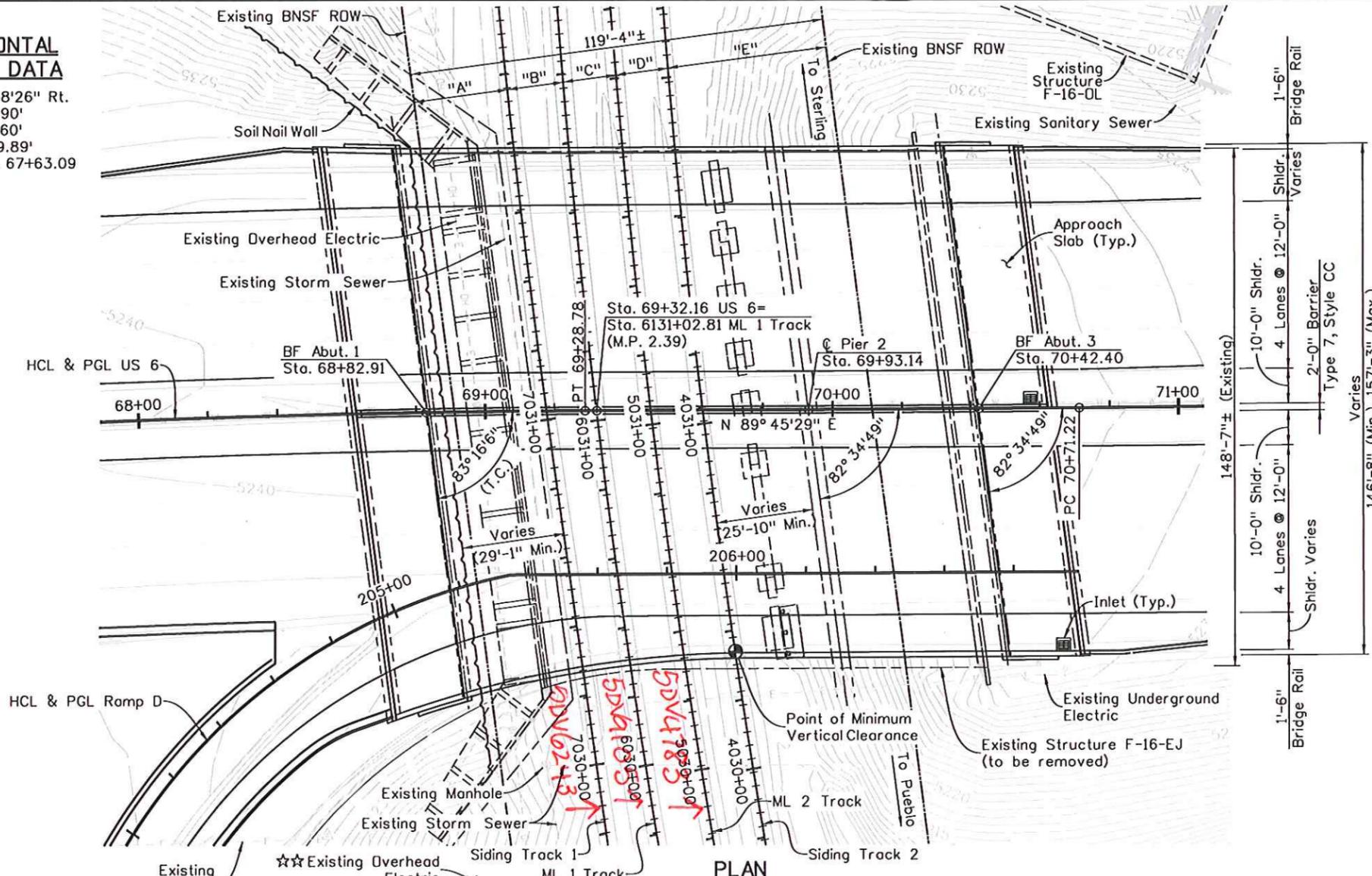
Attachments: Attachment 1: aerial photo of BNSF bridge replacement  
Attachment 2: section and plan view of BNSF bridge replacement  
Attachment 3: South Platte River Bridge Replacement with West and Southside  
Interceptor

Attachment 1  
BNSF bridge replacement  
Effects to Historic Railroads



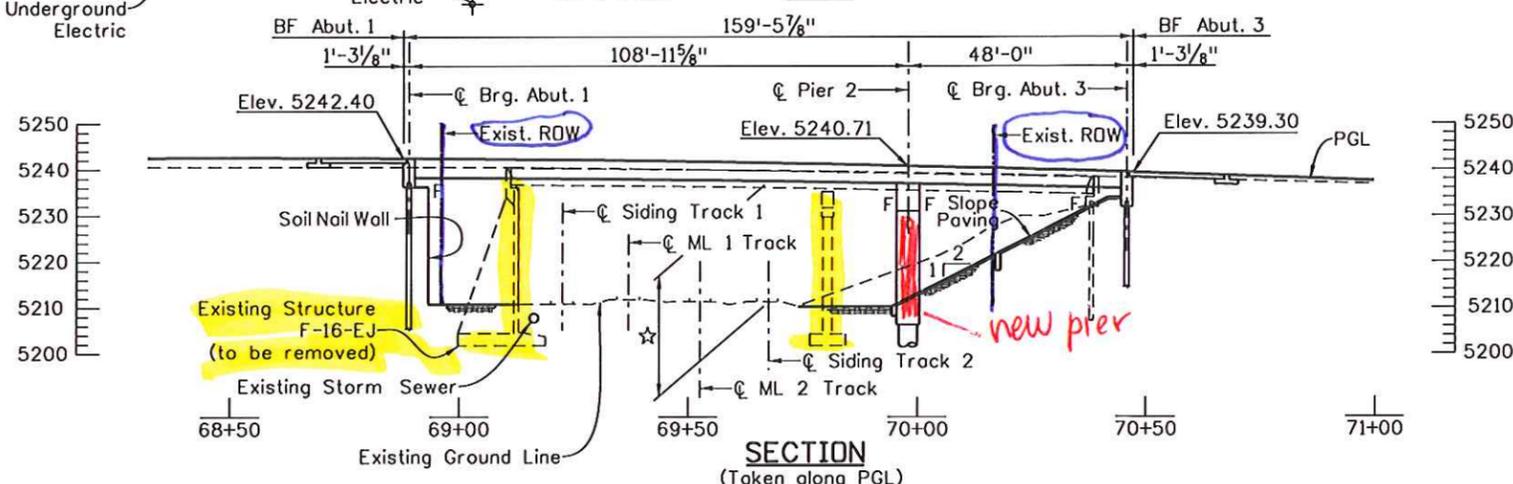
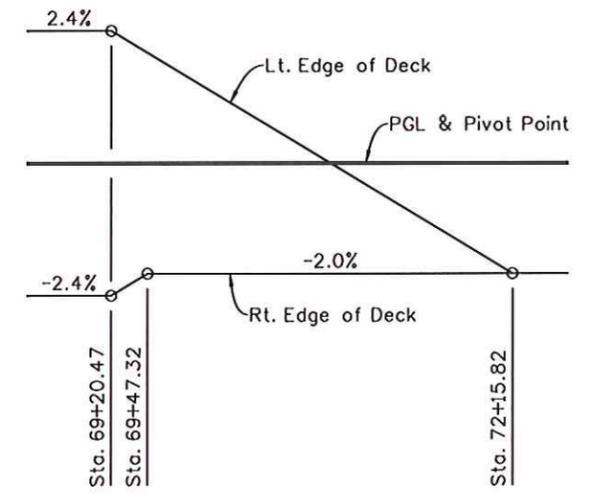
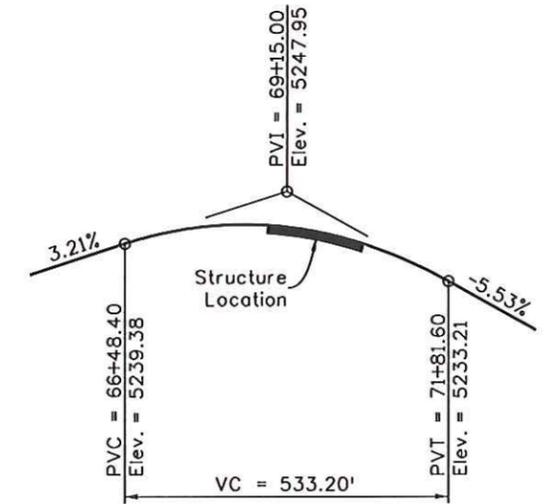
**HORIZONTAL CURVE DATA**

Δc = 4° 58' 26" Rt.  
 Tc = 165.90'  
 Lc = 331.60'  
 Rc = 3819.89'  
 PI = Sta. 67+63.09



**TRACK CLEARANCE TABLE**

"A"	"B"	"C"	"D"	"E"
Varies 26'-3" Min.	Varies 13'-7" Min.	Varies 15'-4" Min.	Varies 14'-8" Min.	Varies 46'-10" Min.



☆ Minimum Vertical Clearance: 23'-9" Concrete Alternate 23'-6" Steel Alternate  
 ☆☆ Minimum Vertical Clearance to Existing Overhead Electric at HCL = 47'-6"

*Attachment 2*

**FIR**  
 3/30/2012

Print Date: 3/29/2012  
 File Name: 18202BRDG\_GeneralLayout.dgn  
 Horiz. Scale: 1:12 Vert. Scale: As Noted  
 Staff Bridge Branch - Unit 022X Unit Leader Initials  
**WILSON & COMPANY**

Sheet Revisions		
Date:	Comments	Init.

Colorado Department of Transportation  
  
 8833 South Wadsworth Court  
 Littleton, CO 80128  
 Phone: 303-972-9112 FAX: 303-972-9114  
 Region 6 MP

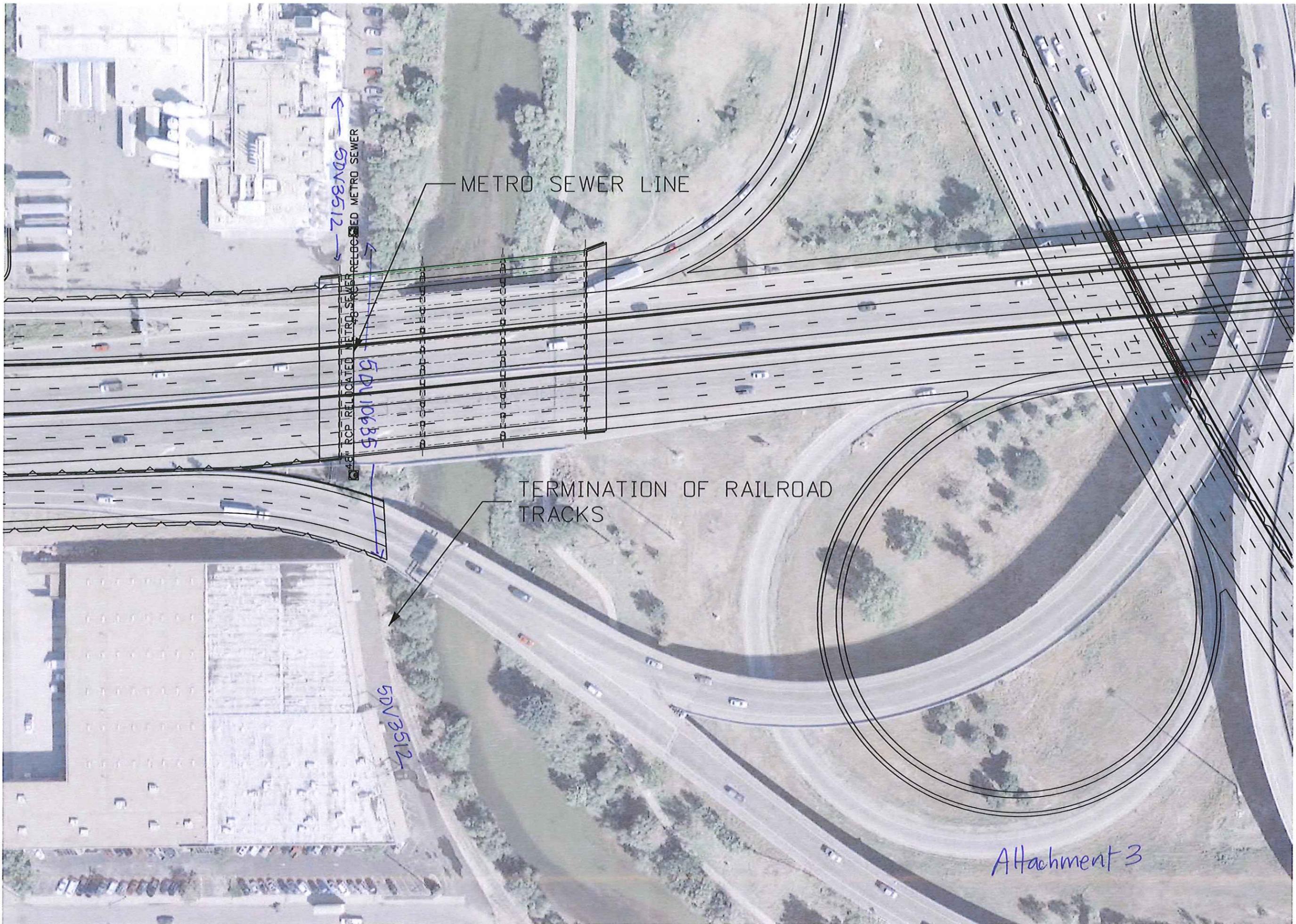
As Constructed  
 No Revisions:  
 Revised:  
 Void:

**US 6 OVER BNSF GENERAL LAYOUT**  
 Designer: B. Allen  
 Detailer: D. Anderson  
 Sheet Subset: BRIDGE  
 Structure Numbers: F-16-YJ  
 Subset Sheets: B1 of BX

Project No./Code  
 FBR 0062-026  
 18202  
 Sheet Number 27

DRAnderson 11:22:34 AM c:\pwworking\wilson\_projects\dranderson\dms6192\18202BRDG\_GeneralLayout.dgn

Design		Detail		Quantities	
INITIAL	DATE	INITIAL	DATE	INITIAL	DATE



METRO SEWER LINE

TERMINATION OF RAILROAD TRACKS

SDV3512

SDV10635

SDV3512

48" RCP RELICATED METRO SEWER  
← 50' RCP RELOCATED METRO SEWER

Attachment 3

## **Attachment 5**

Correspondence, April 18, 2012: SHPO to CDOT Revised Area of Potential Effect for Historic Survey within the 6<sup>th</sup> Avenue Corridor of the 1-25 Valley Highway Environmental Impact Statement Project (CHS #40477)

April 18, 2012

Elizabeth Kemp-Herera  
Region 6 Planning and Environmental Manager  
Colorado Department of Transportation, Region 6  
2000 South Holly Street  
Denver, CO 80222

Re: Revised Area of Potential Effect for Historic Survey within the 6<sup>th</sup> Avenue Corridor of the I-25 Valley Highway Environmental Impact Statement Project. (CHS #40477)

Dear Ms. Kemp-Herrera:

Thank you for your correspondence dated April 10, 2012 and received by our office on April 12, 2012 regarding the consultation of the above-mentioned project under Section 106 of the National Historic Preservation Act (Section 106). After review of the provided additional information, we do not object to the proposed revised Area of Potential Effects (APE) for the above-mentioned project.

We request being involved in the consultation process with the local government, which as stipulated in 36 CFR 800.3 is required to be notified of the undertaking, and with other consulting parties. Additional information provided by the local government or consulting parties might cause our office to re-evaluate our eligibility and potential effect findings.

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

Sincerely,



Edward C. Nichols  
State Historic Preservation Officer

## **Attachment 6**

Correspondence, June 29, 2012: SHPO to CDOT Finding of Concurrence, Eligibility



June 29, 2012

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

Re: Determination of Eligibility within the 6<sup>th</sup> Avenue Corridor of the I-25 Valley Highway  
Environmental Impact Statement Project (CHS #40477)

Dear Ms. Hann,

Thank you for your correspondence dated June 22, 2012 and received by our office on June 25, 2012 regarding the review of the above-mentioned project under Section 106 of the National Historic Preservation Act (Section 106).

After review of the provided information, we concur with the recommended determinations of eligibility for the National Register of Historic Places for the properties listed below. Please note that in regards to the segment surveys, the term “supporting” or “not supporting” is more appropriate than “non-contributing” or “contributing” as stated in the cover letter. In our concurrence of segments, we are applying the supporting and not supporting terms.

- 5DV.7076
- 5DV.7080
- 5DV.7082
- 5DV.7083
- 5DV.7084
- 5DV.7085
- 5DV.5134
- 5DV.8325
- 5DV.9065
- 5DV.9848
- 5DV.4783.3
- 5DV.6243.2
- 5DV.9105.2
- 5DV.3512.4
- 5DV.4783.5
- 5DV.6243.8
- 5DV.10635.6
- 5DV.11289.1
- 5DV.11256
- 5DV.11260
- 5DV.11261
- 5DV.11262
- 5DV.11263
- 5DV.11264
- 5DV.11265
- 5DV.11266
- 5DV.11267
- 5DV.11268
- 5DV.11269
- 5DV.11270
- 5DV.11271
- 5DV.11272
- 5DV.11273
- 5DV.11274
- 5DV.11275

- 5DV.6033.14: Our office wants to confirm the determination of eligibility for this resource. In our opinion, the entire linear resource 5DV.6033 is eligible for the National Register and segment 5DV.6033.14 does not support the overall eligibility of the entire linear resource. We recognize that the FHWA/ACHP Interstate exemption applies to I-25.
- 5DV.9105, including segment 5DV.9105.4. According to the site form, the entire resource was recommended as not eligible, but the form is filled out for a segment. After review of the information, we concur that the entire linear resource 5DV.9105 is not eligible for the NRHP.

If unidentified archaeological resources are discovered during construction, work must be interrupted until the resources have been evaluated in terms of the National Register criteria, 36 CFR 60.4, in consultation with this office.

We request being involved in the consultation process with the local government, which as stipulated in 36 CFR 800.3 is required to be notified of the undertaking, and with other consulting parties. Additional information provided by the local government or consulting parties might cause our office to re-evaluate our eligibility and potential effect findings.

Please note that our compliance letter does not end the 30-day review period provided to other consulting parties.

If we may be of further assistance, please contact Amy Pallante, our Section 106 Compliance Manager, at (303) 866-4678.

Sincerely,

A handwritten signature in black ink, appearing to read "E. C. Nichols". The signature is stylized with a large initial "E" and a long horizontal stroke at the end.

Edward C. Nichols  
State Historic Preservation Officer

A small, handwritten mark or signature in black ink, located to the left of the typed name and title.

## **Attachment 7**

Correspondence, August 23, 2012: SHPO to CDOT Section Determinations of Effect within the 6<sup>th</sup> Avenue Corridor of the I-25 Valley Highway Environmental Impact Statement Project (CHS #40477)

August 23, 2012

Elizabeth Kemp-Herera  
Region 6 Planning and Environmental Manager  
Colorado Department of Transportation, Region 6  
2000 South Holly Street  
Denver, CO 80222

Re: Section 106 Determinations of Effect within the 6<sup>th</sup> Avenue Corridor of the I-25 Valley  
Highway Environmental Impact Statement Project (CHS #40477)

Dear Ms. Kemp-Herrera:

Thank you for your correspondence dated August 2, 2012 and received by our office on August 7, 2012 regarding the consultation of the above-mentioned project under Section 106 of the National Historic Preservation Act (Section 106).

After review of the provided additional information, we concur with the recommended findings of *no historic properties affected* [36 CFR 800.4(d)(1)] for the historic properties listed below.

- 5DV.5134
- 5DV.3512, including segment 5DV.3512.4.

We concur with the recommended finding of *no adverse effect* [36 CFR 800.5(b)] for the historic properties listed below.

- 5DV.4783, including segments 5DV.4783.3 and .5.
- 5DV.6243, including segments 5DV.6243.2 and .8.
- 5DV.11289, including segment 5DV.11289.1.

We concur with the recommended finding of *adverse effect* [36 CFR 800.5(a)(1)] for resource 5DV.10635, including segment 5DV.10635.6.

We acknowledge that FHWA intends to make a *de minimis* determination in respect to the requirements of Section 4(f). We also understand that the adverse effect will be mitigated in the future with the execution of the Denver brick-lined sewers Programmatic Agreement. We also agree with of the application of the Net Benefit finding under Section 4(f).

If unidentified archaeological resources are discovered during construction, work must be interrupted until the resources have been evaluated in terms of the National Register criteria, 36 CRF 60.4, in consultation with this office.

We request being involved in the consultation process with the local government, which as stipulated in 36 CFR 800.3 is required to be notified of the undertaking, and with other consulting parties. Additional information provided by the local government or consulting parties might cause our office to re-evaluate our eligibility and potential effect findings.

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

Sincerely,

Handwritten signature of Edward C. Nichols in black ink, appearing as 'E.C. Nichols'.

Edward C. Nichols  
State Historic Preservation Officer

A handwritten flourish or mark in black ink, consisting of a loop and a horizontal line.

## **Attachment 8**

Draft Memorandum of Agreement for Brick Lined Sewer

# Draft

MEMORANDUM OF AGREEMENT  
AMONG  
THE FEDERAL HIGHWAY ADMINISTRATION,  
**ADVISORY COUNCIL ON HISTORIC PRESERVATION,**  
THE COLORADO STATE HISTORIC PRESERVATION OFFICER,  
AND THE COLORADO DEPARTMENT OF TRANSPORTATION  
REGARDING  
BRICK-LINED SEWERS  
IN THE CITY AND COUNTY OF DENVER

WHEREAS, the Federal Highway Administration (FHWA) intends to provide financial assistance to select roadway improvement projects within the City and County of Denver (CCD);

WHEREAS, FHWA and the Colorado Department of Transportation (CDOT) , in consultation with the Colorado State Historic Preservation Officer (SHPO) has determined that implementation of these roadway improvement projects may have adverse effects on segments of the brick sewer lines in Denver; and,

WHEREAS, this Agreement shall be used for related transportation projects affecting any and all sections of brick sewer lines in the CCD that may result in adverse effects to eligible segments of the brick sewer lines, subject to the availability of funding and the purpose and need for such projects; and

WHEREAS, the Area of Potential Effect (APE) for this Agreement consists of the legal boundaries of the CCD; and

WHEREAS, the SHPO, which reflects the interests of Colorado and its citizens in preserving their cultural heritage, and advises and assists Federal agencies in carrying out their Section 106 responsibilities (36 CFR 800), has consulted with FHWA pursuant to 36 CFR Part 800 and concurred with FHWA's determination that some of Denver's brick sewer lines are eligible for listing in the National Register of Historic Places; and

WHEREAS, the Advisory Council on Historic Preservation (ACHP), which issues regulations to implement Section 106, oversees the operation of Section 106 of the National Historic Preservation Act (NHPA) (16 U.S.C. 470f), and provides comments to agency officials on undertakings and programs that affect historic properties, has reviewed this undertaking and declined to participate in the consultation process; and

WHEREAS, consulting parties with an interest in Denver's brick sewer lines, including the Denver Landmark Preservation Commission, Metro Wastewater, and the City and County of Denver Public Works Wastewater Management Division, have been provided with an opportunity to comment upon this Agreement. These consulting parties have been invited to concur in this Agreement but are not responsible for implementing its terms; and

WHEREAS, the duration for this Agreement is **ten years** after the execution of this Agreement; and  
WHEREAS, any future infrastructure improvement projects planned on roadways within the CCD that will result in removal or alteration of the brick sewer lines due to needed transportation improvements

will be covered by this Agreement and will include appropriate notification to the SHPO and ACHP as discussed in Stipulation 1 of this Agreement; and

WHEREAS, CDOT and CCD will assist FHWA with its coordination with the National Environmental Policy Act by using relevant provisions of this MOA; and

NOW, THEREFORE, FHWA and the SHPO agree, and CDOT concurs, that projects affecting the brick sewer lines in the CCD shall be implemented in accordance with the following stipulations in order to take into account the effect of the undertaking on historic properties in compliance with Section 106 of the NHPA.

## STIPULATIONS

FHWA, in consultation with CDOT, will implement the terms of this Agreement, as follows:

### 1. Treatment of Brick Sewer Lines in CCD:

- a. When transportation projects covered under this Agreement have an adverse effect on the brick sewer lines within the CCD, CDOT, acting on behalf of FHWA, shall write a letter to SHPO and consulting parties notifying them of the proposed project and the intention to invoke this Agreement to fulfill responsibilities under Section 106.
- b. The documentation for this notification will adhere to Section 800.11(e)(1) through (6) of the Section 106 regulations. The requirements of this section shall be fulfilled and FHWA is not required to notify the ACHP unless a dispute shall arise as described in Stipulation 6 of this Agreement.

2. **Mitigation:** A detailed historic context on Denver's brick sewers has been prepared and attached as Appendix One. In addition, detailed surveys have been prepared for 20 brick sewer lines in Denver. A list of these surveyed brick sewer lines is included as Appendix Two. The historic context report provides documentation of the development and use of brick sewer lines during their period of significance (1880-1937). The documentation provided in this historic context report will serve as the mitigation for all future projects which may have an adverse effect on brick sewer lines within the CCD. Mitigation will not be provided on a project specific basis; rather this historic context will be applied as mitigation for the whole system of brick sewers in the CCD.

3. **Coordination with the National Environmental Policy Act (NEPA):** FHWA shall use this agreement as part of its responsibility to meet the requirements of NEPA, including projects that are classified as Categorical Exclusions, Environmental Assessments, and Environmental Impact Statements according to the NEPA guidelines. If FHWA intends to coordinate Section 106 as part of the NEPA process, all consulting parties shall be notified accordingly when FHWA complies with Stipulation 1.a. of this Agreement.

4. **Review:** The SHPO may review activities carried out pursuant to this Agreement. FHWA and CDOT will cooperate with SHPO in carrying out their review responsibilities and will arrange for on-site visits for SHPO or other consulting parties during the removal of segments of the brick sewer lines if so requested.

5. **Resolving Objections:** Should any signatory to this Agreement object in writing to FHWA regarding any action carried out or proposed with respect to the implementation of this

Agreement, FHWA shall consult with the objecting party. If after initiating such consultation, FHWA determines that the objection cannot be resolved through consultation, it shall forward all documentation relevant to the objection to ACHP, including FHWA's proposed response to the objection. Within 45 calendar days after receipt of all pertinent documentation, ACHP shall exercise one of the following options:

- a. Advise FHWA that ACHP concurs with FHWA's proposed response to the objection, whereupon FHWA will respond to the objection accordingly; or
  - b. Provide FHWA with recommendations, which FHWA shall take into account in reaching a final decision regarding its response to the objection; or
  - c. Should ACHP not exercise one of the above options within 45 calendar days after receipt of the pertinent documentation, FHWA may assume ACHP concurrence in its proposed response to the objection.
  - d. FHWA shall take into account any ACHP recommendation or comment provided in accordance with this stipulation with reference only to the subject of the objection; FHWA's responsibility to carry out all actions under this Agreement that are not the subjects of the objection shall remain unchanged.
  - e. At any time during implementation of any stipulation in this Agreement, should an objection to any such stipulation or its manner of implementation be raised by a member of the public, FHWA shall take the objection into account and consult as needed with the objecting party, ACHP, and SHPO to address the objection
- 6. Periodic Reporting Requirements:** On June 30<sup>th</sup> of each calendar year the agreement is in effect, CDOT will provide a report to consulting parties and SHPO on the status of the MOA, and its use in the previous year. The annual report will also include any recommendations to amend this Agreement or improve communication among the parties. The ACHP will be provided a copy of the annual report but will not be required to comment on the report.
- 7. Amendment:** The SHPO, FHWA, CDOT or CCD may request that this Agreement be amended, whereupon they will consult in accordance with 36 CFR 800 to consider such amendment. No amendment shall take effect until it has been executed by all signatories. In the event of an amendment, the ACHP will be notified and FHWA will file the resulting amendment with this Agreement.
- 8. Termination:** The SHPO, FHWA, CDOT, or CCD may propose to terminate this Agreement by providing thirty (30) calendar day notice to the other parties explaining the reason(s) for the proposed termination. The SHPO, FHWA, CDOT and CCD will consult during this period to seek agreement on amendments or other actions that would avoid termination. In the event of termination, FHWA will comply with 36 CFR 800.3 through 800.7 with regard to individual undertakings covered by this Agreement.
- 9. Failure to Carry Out the Agreement:** In the event FHWA does not carry out the terms of this Agreement, FHWA will comply with 36 CFR 800.3 through 800.7 with regard to individual undertakings.
- 10. Duration:** This agreement shall become effective upon execution by FHWA, SHPO, and CDOT and shall remain in effect for a ten-year period. The time frame can be expanded if agreed to in

writing by the signatories prior to the expiration date. FHWA shall provide the ACHP with written notification regarding any extension of the MOA.

- 11. FHWA Coordination:** Prior to submitting documentation to SHPO and consulting parties under the terms of this Agreement, CDOT will coordinate with FHWA, which has the responsibility of oversight of the implementation of this MOA.

Execution of this Memorandum of Agreement by FHWA and Colorado SHPO evidences that FHWA has afforded ACHP a reasonable opportunity to comment on FHWA's future financial assistance for select roadway improvement projects that may affect brick sewer lines within the City and County of Denver.

**SIGNATORIES:**

**Federal Highway Administration**

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John M. Cater, P.E. Division Administrator Date

**Advisory Council on Historic Preservation**

---

John M. Fowler, Executive Director Date

**Colorado State Historic Preservation Officer**

---

Edward C. Nichols, SHPO Date

**INVITED SIGNATORIES:**

**Colorado Department of Transportation**

---

Timothy J. Harris, Chief Engineer Date

**Metro Wastewater**

---

Catherine Gerali, District Manager Date

**City and County of Denver  
Public Works-Wastewater Management**

---

**Insert name and title here**

Date

**APPENDIX ONE: Denver's Brick Sewers - Historic Context**

**APPENDIX TWO: List of Surveyed Brick Sewer Lines in Denver**