CHAPTER 4 Draft Section 4(f) Evaluation

4.1 INTRODUCTION

- ² This evaluation assesses impacts of the proposed
- 3 US 6/Wadsworth project on parks and historic
- 4 properties. It was prepared in compliance with
- 5 Section 4(f) of the Department of Transportation Act
- 6 and is supported by other analyses in this EA and these
- 7 reference documents available in Appendix C:
- 8 Alternatives Development and Screening Technical
- 9 Memorandum (CH2M HILL, 2008c), Historic Resources
- 10 Survey (TEC, 2008), and Determination of Effects to
- 11 Historic Properties (CH2M HILL et al., 2008d).

12 4.2 SECTION 4(f)

- 13 Section 4(f) of the Department of Transportation Act of 14 1966, as amended, and codified in 49 United States 15 Code (U.S.C.) § 303, declares that "[i]t is the policy of 16 the United States Government that special effort 17 should be made to preserve the natural beauty of the 18 countryside and public park and recreation lands, 19 wildlife and waterfowl refuges, and historic sites." 20 FHWA has adopted regulations to ensure its
- 22 Section 4(f) prohibits FHWA from approving the use of 23 a publicly owned land of a public park, recreation 24 area, or wildlife and waterfowl refuge of national,

21 compliance with Section 4(f) (23 CFR 774).

- 25 state, or local significance, or land of a historic site of 26 national, state, or local significance unless:
- A determination is made that 1) there is no 27 📀 feasible and prudent avoidance alternative to use 28 of land from the property, AND 2) the action 29 includes all possible planning to minimize harm to 30 the property resulting from such use, OR
- The use of the property, including any measures to minimize harm, will have a de minimis impact on the property.

- 35 There are three types of Section 4(f) uses: direct use,
- 36 temporary use, and constructive use. Because this
- 37 project would not result in any temporary or
- 38 constructive uses, they are not discussed further.

39 4.2.1 DIRECT USES

- 40 A direct use takes place when the land is permanently
- 41 incorporated into a transportation facility.

42 4.2.2 DE MINIMIS IMPACTS

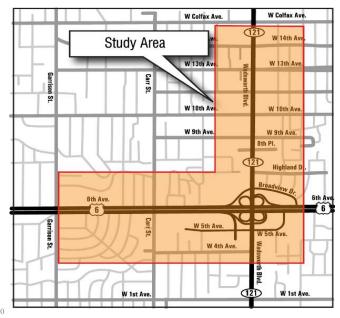
- 43 Certain uses of Section 4(f) land may have a minimal
- 44 or de minimis impact on the protected resource. When
- 45 this is the case, FHWA can make a de minimis impact
- 46 determination. Properties with a de minimis
- 47 determination do not require an analysis of avoidance
- 48 alternatives or a least harm analysis (23 CFR
- 49 774.17[5]; FHWA, 2005a).
- 50 The *de minimis* criteria and associated determination
- 51 are different for historic sites than for parks, recreation
- 52 areas, and wildlife and waterfowl refuges.
- For publicly owned parks, recreation areas, and wildlife and waterfowl refuges, de minimis impacts 54
- are defined as those that do not "adversely affect 55 the activities, features and attributes" of the
- 56
- Section 4(f) resource. The public must be afforded 57 58
- an opportunity to review and comment on the findings. 59
- For historic sites, de minimis impacts are based on the determination that no historic property is 61
- affected by the project or that the project will have 62
- no adverse effect on the historic property in 63 accordance with Section 106 of the National 64
- Historic Preservation Act. FHWA must notify 65
- SHPO of its intent to make a de minimis finding.

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4.3 PURPOSE AND NEED

- ² The purpose of the US 6 and Wadsworth project is to
- 3 improve traffic flow and safety, accommodate high
- 4 traffic volumes, and increase multi-modal travel
- 5 options and connections at the US 6 and Wadsworth
- 6 interchange and along Wadsworth between 4th
- 7 Avenue and 14th Avenue. The project is located
- 8 entirely within central Lakewood in Jefferson County,
- 9 Colorado (see Exhibit 4-1).

EXHIBIT 4-1: PROJECT LOCATION



- 11 Improvements are needed to:
- lmprove safety for motorists, pedestrians, and bicyclists
- Improve the operational efficiency of the
 interchange and on Wadsworth
- 6 Meet current and future traffic demands
- Support multi-modal connections

Chapter 1 of the EA provides additional details about the purpose and need for this project.

20 4.4 FEASIBLE AND PRUDENT ALTERNATIVES

- The first test under Section 4(f) is to determine which alternatives are feasible and prudent. An alternative is
- 23 feasible if it is technically possible to design and build.
- ²⁴ According to FHWA regulations (23 CFR 774.17), an

- alternative may be rejected as not prudent for thefollowing reasons:
- It compromises the project to a degree that it is unreasonable to proceed with the project in light of its stated purpose and need;
- ii) It results in unacceptable safety or operationalproblems;
- 32 iii) After reasonable mitigation, it still causes:

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- a) Severe social, economic, or environmental
 impacts;
 - b) Severe disruption to established communities;
 - Severe disproportionate impacts to minority or low-income populations; or
 - d) Severe impacts to environmental resources protected under other federal statutes;
- 40 iv) It results in additional construction, maintenance,
 41 or operational costs of an extraordinary
 42 magnitude;
- 43 V) It causes other unique problems or unusual44 factors; or
- vi) It involves multiple factors described above, that
 while individually minor, cumulatively cause
 unique problems or impacts of extraordinary
 magnitude.
- 49 Where sufficient analysis demonstrates that a
- 50 particular alternative is not feasible and prudent, the
- 51 consideration of that alternative as a viable alternative
- 52 comes to an end. If an alternative is identified that
- ₅₃ avoids the use of Section 4(f) properties, it must be
- 54 selected. No prudent and feasible avoidance
- 55 alternative was identified for this project.
- 56 The US 6/Wadworth project considered 9 interchange
- 57 alternatives (including the No Build Alternative). Three
- 58 additional alternatives were developed as Section 4(f)
- 59 avoidance options. Exhibit 4-2 summarizes the
- 60 Section 4(f) use and avoidance for all of these
- 61 alternatives. Five were determined to be feasible and
- 62 prudent but none of the feasible and prudent
- 63 alternatives avoided Section 4(f) resources. Three
- 64 avoid Section 4(f) resources but are not feasible and
- 65 prudent. Additional details on these alternatives are
- 66 available in reference documents included in
- 67 Appendix C (CH2M HILL, 2008c; CH2M HILL et al.,
- 68 2008d; CH2M HILL, 2009h).

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EXHIBIT 4-2: SUMMARY OF FEASIBLE AND PRUDENT INTERCHANGE ALTERNATIVES

Alternative	Feasible and Prudent? ¹	Avoids 4(f) Use?
No Build Alternative; no reconstruction of interchange	No . Not prudent (i). Does not meet purpose and need to improve safety, capacity, interchange operations, multimodal connections.	Yes
Tight Diamond with Loop Interchange (Build Alternative); similar to the Tight Diamond (see below) except it maintains a loop ramp in the NW quadrant of the interchange, and there would be no traffic signal at the intersection of the loop ramp with Wadsworth; maintains off-ramp and frontage road in NE quadrant	Yes	No. Requires use of four historic properties (5JF4536, 5JF4542, 5JF3549, and 5JF3548).
Traditional Diamond Interchange; most common interchange type with one entrance and one exit in each direction; on- and off-ramps meet at two signalized intersections; ramps form a diamond shape when viewed from the air; maintains off-ramp and frontage road in NE quadrant	Yes	No. Requires use of four historic properties (5JF4536, 5JF4542, 5JF3549, and 5JF3548).
Tight Diamond Interchange; like a traditional diamond, except entrance and exit ramps are shifted closer to the freeway; maintains off-ramp and frontage road in NE quadrant	Yes	No. Requires use of four historic properties (5JF4536, 5JF4542, 5JF3549, and 5JF3548).
Single Point Urban Interchange; similar to a diamond interchange but with all ramps controlled by a single set of traffic signals; maintains off-ramp and frontage road in NE quadrant	Yes	No. Requires use of four historic properties (5JF4536, 5JF4542, 5JF3549, and 5JF3548).
Partial Cloverleaf Interchange; uses loop ramps for two of the left-turn movements and straight ramps to handle the other two left-turn movements; maintains off-ramp and frontage road in NE quadrant	Yes	No. Requires use of four historic properties (5JF4536, 5JF4542, 5JF3549, and 5JF3548).
Partial Cloverleaf with Flyover Ramp Interchange; like the partial cloverleaf except the highest-volume traffic movement (in NW quadrant) is handled on an elevated ramp; maintains off-ramp and frontage road in NE quadrant	No. Not prudent (iii). Would result in cumulatively severe impacts. Would result in unacceptable social impact from increased noise in a community already severely affected by traffic noise. Would result in increased community disruption from nearly twice as many relocations as compared with other alternatives. Would increase construction costs by more than 20 percent, which would be excessive given transportation budget constraints.	No
Full Cloverleaf Interchange with Collector- Distributor Roads; enlarges the four loop ramps to meet current design standards and expands the frontage road system between ramps to eliminate weaving conflicts on mainline US 6; maintains off- ramp and expands frontage road in NE quadrant	No. Not prudent (i). Does not meet purpose and need to improve pedestrian and bicycle safety because pedestrians and bicycles would still need to cross free-flow loop ramps in all quadrants of the interchange. Would result in highest number of relocations and greatest cost of options considered.	No
Diverging Diamond Interchange; rare interchange type that would remove left turns in the intersection by requiring Wadsworth drivers to briefly cross opposite lanes of traffic at two crossover intersections; maintains off-ramp and frontage road in NE quadrant	No. Not prudent (i). Does not meet purpose and need for improved capacity on Wadsworth. Drivers are not accustomed to crossing opposing traffic, and they would likely slow down due to their uncertainty. Crossing in front of opposing traffic (even though opposing traffic is stopped) violates expectations.	No
Folded Diamond Interchange; folds westbound US 6 to northbound Wadsworth onto loop ramp in NW quadrant for westbound US 6 to southbound Wadsworth traffic; maintains existing frontage road but removed off-ramp in NE quadrant	No. Not prudent (i). Does not meet purpose and need. Would increase congestion along US 6 and at the US 6/Wadsworth interchange because all northbound and southbound Wadsworth traffic from westbound US 6 would exit at one location, and the deceleration lane would not be long enough to handle queues. Operational efficiency of the consolidated loop ramp exit would be compromised to the point that the loop ramp would not function as a free-flow ramp. A signal would be required for northbound Wadsworth, and a double-lane exit ramp would be inefficient and potentially confusing to drivers.	Yes
Close frontage road in NE quadrant and reconstruct interchange; maintains an off-ramp in the NE quadrant but removes the frontage road and uses the frontage road area for off-ramp	No. Not prudent (iii). Would result in severe community disruption, as all properties along the frontage road, including historic properties, would need to be acquired because they would have no access.	No
Improve Kipling and/or Sheridan interchanges to divert Wadsworth traffic; maintains existing Wadsworth interchange and focuses capacity improvements on the adjacent US 6 interchanges	No. Not prudent (i). Does not meet purpose and need for safety improvements at the Wadsworth interchange. Would not address traffic demands for access to destinations along Wadsworth or for north-south regional travel.	Yes

As noted in Section 4.4, alternatives are defined as not prudent based on standards contained in 23 CFR 774.17. Where an alternative is deemed not prudent in Exhibit 4-2, the standard is noted. For instance if an alternative does not meet purpose and need, it is presented as "Not prudent (i)."

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- Because all feasible and prudent alternatives use land
- 2 from Section 4(f) resources, the next step in the
- 3 evaluation is to determine which alternative results in
- 4 the least overall harm to the 4(f) resources. The
- 5 discussion of least harm is presented in Section 4.6.3.

6 4.5 PARKS AND RECREATION RESOURCES

7 4.5.1 DESCRIPTION OF 4(f) RESOURCES

8 There is one Section 4(f) park resource within the

- 9 construction limits of the Build Alternative. Two Creeks
- 10 Park is a planned 3.35-acre recreational facility located
- 11 east of Wadsworth between 10th and 12th Avenues.
- 12 Only a small "finger" of the property associated with the
- 13 confined Dry Gulch drainage channel is adjacent to
- 14 Wadsworth. Dry Gulch runs through the southern
- 15 portion of the property. The boundaries of the park are
- 16 outlined in black in Exhibit 4-3.

17 EXHIBIT 4-3: BOUNDARIES OF TWO CREEKS PARK



18 The City of Lakewood acquired the Two Creeks Park 19 property in 2007. The acquisition was funded by 20 Jefferson County Open Space for the express use as a 21 park. The City Parks Manager identifies the planned 22 park as a significant recreation resource and envisions 23 developing trails and providing picnic tables to support ²⁴ recreational use of the property (CH2M HILL, 2009g).

25 The property is not currently used for recreation or park 26 purposes, and Lakewood has neither a specific plan

- 27 nor funds to develop the property in the next 5 years.
- 28 The park is not reflected either in Lakewood's
- 29 Comprehensive Plan or the adopted Neighborhood
- 30 Plan, yet both plans identify the need for a park in the
- 31 area. Although not formally designated in planning
- 32 documents as a park, FHWA determined that the Two
- 33 Creeks Park does qualify as a Section 4(f) recreation

- ³⁴ resource because the property acquisition is recent,
- 35 the need for a park in the area is documented in land
- 36 use plans, the acquisition is expressly for a park, and
- 37 budgetary limitations, not intent, require development
- 38 of the park to be phased.

39 4.5.2 *DE MINIMIS* IMPACTS

- 40 Impacts to the proposed park area are associated with
- replacing the Dry Gulch box culvert under Wadsworth.
- 42 The existing culvert (Exhibit 4-4) is undersized to carry
- a 100-year flood and must be widened; it must also be
- 44 lengthened to accommodate the widened Wadsworth
- 45 roadway section.

46 EXHIBIT 4-4: DRY GULCH CULVERT



- 47 The new culvert would extend farther into the park property, incorporating an additional 0.11 acre of the
- 49 drainage channel, resulting in a Section 4(f) use.
- 50 These impacts would not adversely affect the future
- activities, features, or attributes of the planned Two
- Creeks Park. The affected land could not support
- ⁵³ active recreation because of the confined channel.

54 4.5.3 CONSULTATION AND COORDINATION

- 55 The project team has coordinated with Lakewood and
- 56 the Urban Drainage and Flood Control District. Each
- contributed to the design of the Build Alternative and
- recommended drainage improvements in the area of
- 59 the planned Two Creeks Park. Lakewood concurs that
- expansion of the culvert would not adversely affect the
- activities, features, and attributes that qualify Two
- Creeks Park for protection under Section 4(f).
- 63 Public comments on the impacts to the planned park
- 64 will be solicited at the EA public hearing. After
- 65 consideration of public input, FHWA will make a final
- determination on this de minimis finding.

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5JF4513

4.6 HISTORIC RESOURCES

- ² The US 6/Wadsworth project would require use of
- 3 property from eight Section 4(f) historic resources.
- ⁴ Four additional historic properties are present within
- 5 the area of potential effect but have no Section 4(f)
- 6 use. Section 3.8 of the EA contains additional
- 7 information on all historic resources.

8 4.6.1 DE MINIMIS IMPACTS

16 determinations.

⁹ The Build Alternative would result in *de minimis*¹⁰ impacts to two individual historic properties and two
¹¹ historic districts. The properties are illustrated in Exhibit
¹² 4-5, and impacts are summarized in Exhibit 4-6. Based
¹³ on concurrence with the determinations of No Adverse
¹⁴ Effect for these four Section 4(f) resources, FHWA has
¹⁵ informed SHPO of its intent to make *de minimis* impact

EXHIBIT 4-5: HISTORIC PROPERTIES WITH DE MINIMIS IMPACTS





5JF4511



Green Acres Historic District (contributing building)

Lakewood School Historic District (contributing building)

EXHIBIT 4-6: SUMMARY OF *DE MINIMIS* IMPACTS FOR SECTION 4(f) HISTORIC RESOURCES

Site Number	Address	Date	Description	NRHP Eligibility	Impact
5JF4511	1215 Wadsworth Blvd.	1918, 1948/ 1949	Dutch Colonial Revival single- family residence	Officially eligible, Criterion A, association with Lakewood's agricultural history	Partial acquisition (0.08 acre) of historic property frontage
5JF4513	1230 Wadsworth Blvd.	1928	Craftsman Bungalow residence converted into a business	Officially eligible, Criterion C, representative architecture	Acquisition of portion of property (0.03 acre) that does not contribute to historic significance
Lakewood School Historic District	West of Wadsworth to Allison Street between 10th and 12th Avenues	1927 to 1977	Public school complex	Officially Eligible Historic District, Criteria A and C as early public school campus in Jefferson County, association with community development, period architecture	Acquisition of a portion of property adjacent to Wadsworth (0.20 acre) that does not contribute to historic significance; no buildings or contributing landscape features affected
Green Acres Historic District	North of US 6 to 9th Place between Emerald Lane and Reed Street	Late 1940s to early 1960s	Post-World War II residential subdivision	Officially Eligible Historic District, Criteria A and C for association with the development of Lakewood and as a representative post-World War II subdivision	Construction of noise wall near south and west boundaries of the district; permanent easement required from corner of one contributing property; beneficial effects of restoration of neighborhood roads and reduction in traffic noise

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4.6.2 DIRECT USES

- Under all feasible and prudent alternatives, four historic homes would be directly used. Photographs of these resources are presented in Exhibit 4-7. They are described briefly below, with additional details available in the *Historic Resources Survey* (TEC, 2008), included in Appendix C.
- Property 5JF3548 (7395 W. 6th Ave. Frontage Road) is a one-story, single-family house built in 1946. It is eligible for listing in the NRHP under Criterion C for its representative English Norman Cottage architecture.
- Property 5JF3549 (7423 W. 6th Ave. Frontage
 Road) is a one-story, single-family residence built
 in 1939. It is eligible for listing in the NRHP under
 Criterion C because it is representative of the
 Mediterranean Revival architectural style.
- Property 5JF4542 (7433 W. 6th Ave. Frontage
 Road) is a one-story, single-family house built in
 1940. It is eligible for listing in the NRHP under
 Criterion C because it is representative of the
 Minimal Traditional architectural style.
- Property 5JF4536 (700 Wadsworth Blvd.) is a
 one-story residence that has been converted to
 commercial use. It was constructed in 1947 and is
 eligible for listing in the NRHP under Criterion C
 because it is a good example of a late 1940s
 residence that blends the Ranch and Usonian
 architectural styles.

30 EXHIBIT 4-7: SECTION 4(f) HISTORIC PROPERTIES WITH DIRECT USE





5JF3548





5JF4542

5JF4536

As summarized in Exhibit 4-8, all feasible and prudent interchange design concepts require use of these four historic properties. The use is the same for all because they share two primary features: the need for a longer deceleration lane for the westbound off-ramp on US 6 and the need for an improved frontage road connection to Wadsworth in the northeast quadrant of the interchange.

EXHIBIT 4-8: SUMMARY OF DIRECT USES OF SECTION 4(f) HISTORIC RESOURCES

Historic Property	Tight Diamond with Loop	Traditional Diamond	Tight Diamond	SPUI	Partial Cloverleaf	Relative Net Harm
5JF3548	Total acquisition and demolition of building	Total acquisition and demolition of building	Total acquisition and demolition of building	Total acquisition and demolition of building	Total acquisition and demolition of building	Equal
5JF3549	Total acquisition and demolition of building	Total acquisition and demolition of building	Total acquisition and demolition of building	Total acquisition and demolition of building	Total acquisition and demolition of building	Equal
5JF4542	Total acquisition and demolition of building	Total acquisition and demolition of building	Total acquisition and demolition of building	Total acquisition and demolition of building	Total acquisition and demolition of building	Equal
5JF4536	Total acquisition and demolition of building	Total acquisition and demolition of building	Total acquisition and demolition of building	Total acquisition and demolition of building	Total acquisition and demolition of building	Equal

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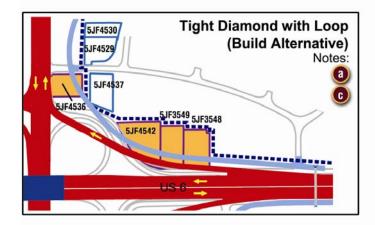
1 4.6.3 LEAST HARM ANALYSIS

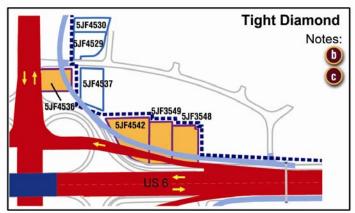
- The Section 4(f) regulation states that, if there is no feasible and prudent alternative that avoids use of Section 4(f) properties, FHWA "may approve only the alternative that causes the least overall harm in light of the statute's preservation purpose." In determining the alternative that causes the overall least harm, the following factors must be balanced (23 CFR 774.3):
- j) The ability to mitigate adverse impacts to each
 Section 4(f) property (including any measures that
 result in benefits to the property);
- The relative severity of the remaining harm, after mitigation, to the protected activities, attributes, or features that qualify each Section 4(f) property for protection;
- The relative significance of each Section 4(f) property;
- The views of the official(s) with jurisdiction over each Section 4(f) property;
- The degree to which each alternative meets the purpose and need for the project;
- vi) After reasonable mitigation, the magnitude of any
 adverse impacts to resources not protected by
 Section 4(f); and
- vii) Substantial differences in costs among thealternatives.

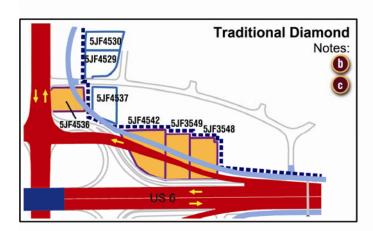
- Exhibit 4-8 summarizes the uses associated with the feasible and prudent alternatives. Each requires total acquisition and demolition of the same four historic properties.
- 31 As illustrated in Exhibit 4-9, the three historic properties 32 currently located on the frontage road (5JF3548, 33 5JF3549, and 5JF4542) would need to be acquired 34 under each of the five options due to the requirements 35 for the off-ramp design. The traditional diamond has 36 the greatest encroachment into the historic properties 37 because it shifts the ramp intersection with Wadsworth 38 farther north. Despite slight differences in the design 39 footprints, all alternatives require relocation of the 40 primary residence. The tight diamond and single-point 41 urban interchange (SPUI) alternatives intersect Wadsworth closer to US 6 but require a signal at 43 Wadsworth and, therefore, need a wider, multi-lane 44 intersection for vehicle storage on the ramp. The partial cloverleaf and tight diamond with loop alternatives 46 require only a single lane intersection with Wadsworth 47 but intersect Wadsworth farther north.
- 48 Site 5JF4536 (at the intersection of the frontage road 49 and Wadsworth) would need to be acquired to widen 50 Wadsworth and add an auxiliary lane for merging, 51 which are features common to all of the alternatives.
- Because the direct use is similar, many of the factors for least harm do not apply to the project (that is, factors i through iv). The Tight Diamond with Loop is determined to be the least harm alternative based on factors v, vi, and vii. It best meets the project's purpose and need, does not result in significant adverse impacts to other resources not protected by Section 4(f), and is not substantially more expensive than the other alternatives.

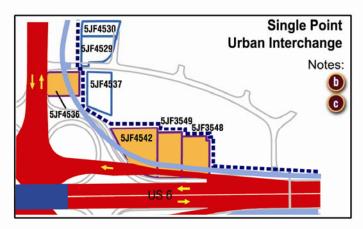
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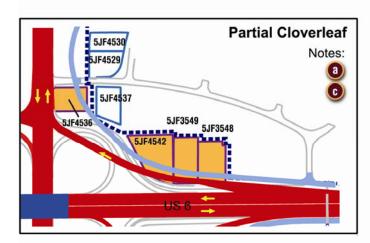
EXHIBIT 4-9: LEAST HARM ANALYSIS











New Structure

Existing Structure/Road

Interchange

New Frontage Road

Contributing to Historic District

Individually Eligible for the NRHP

Total Acquisition

Historic District Boundary

- 2 Left turns for southbound traffic are handled through the loop ramp, and the auxiliary lane allows free-flow right turns for northbound traffic. The free-flow turn requires only a single lane to the intersection, resulting in a narrower footprint in the vicinity of historic properties.
- Multi-lane intersection required for vehicle queuing at Wadsworth traffic signal has larger footprint and encroaches farther into Section 4(f) properties. Need for wider intersection (more lanes) and proper intersection geometry (perpendicular rather than skewed) pushes frontage road through properties.
- Widening of Wadsworth to add northbound auxillary merging lane for off-ramp requires acquisition of 5JF4536 regardless of frontage road configuration.

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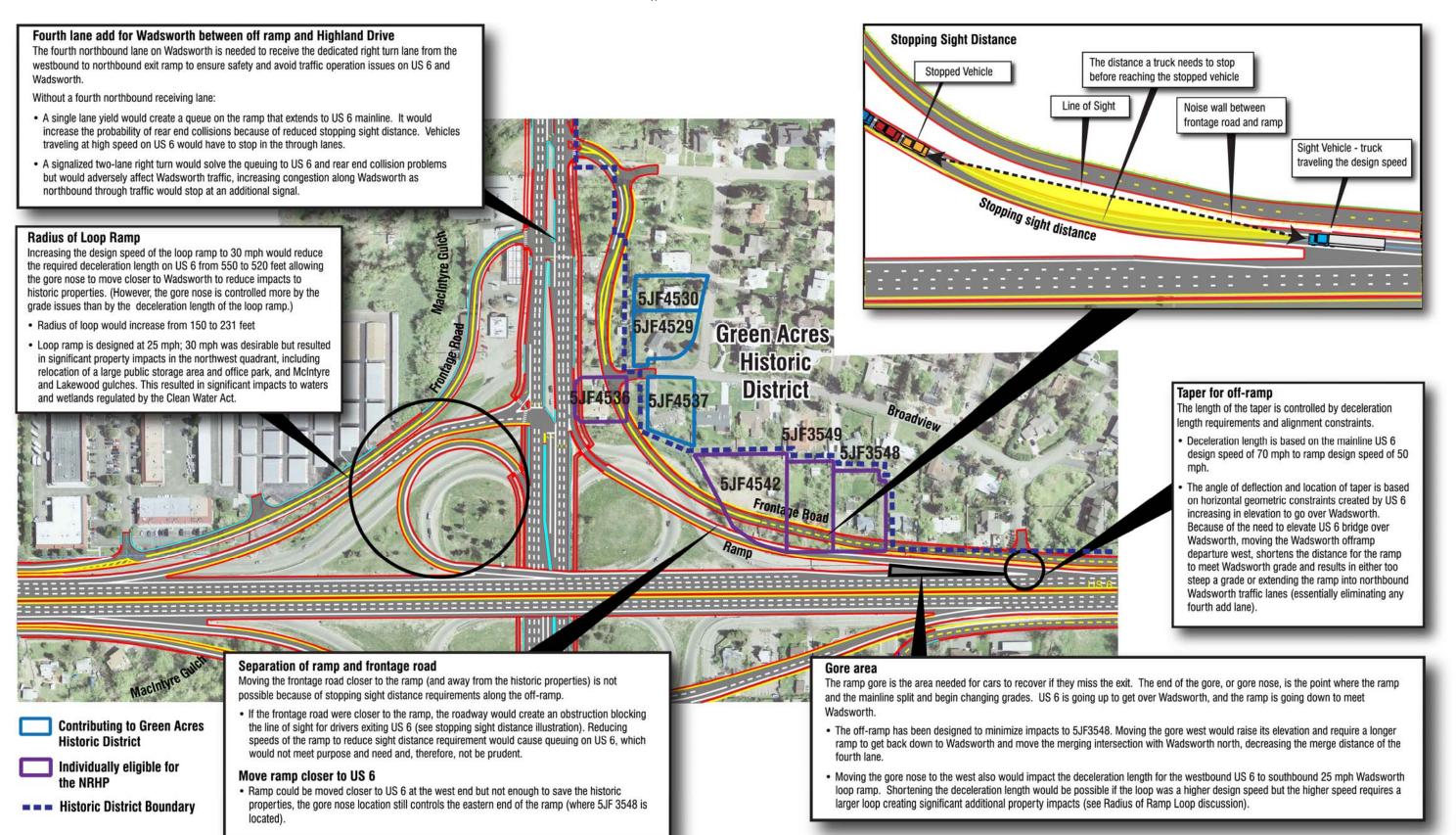
1 4.6.4 MEASURES TO MINIMIZE HARM

- 2 Before approving an action requiring use of any
- 3 Section 4(f) property, FHWA is required to "include all
- 4 possible planning to minimize harm" in that action.
- 5 According to 23 CFR 774.17, "all possible planning
- 6 means that all reasonable measures identified in the
- 7 Section 4(f) evaluation to minimize harm or mitigate for
- 8 adverse impacts and effects must be included in the
- project." For historic sites, mitigation measures are
- $_{\rm 10}$ generally identified through the Section 106 $\,$
- 11 consultation process (36 CFR 800).
- 12 To determine if impacts could be avoided, minimized,
- 13 or reduced while still maintaining a design that meets
- 14 safety, capacity, and multimodal needs, interchange
- 15 design elements of the Build Alternative that resulted in
- 16 impacts to historic properties were considered
- 17 carefully. As illustrated in Exhibit 4-10, the following
- 18 design elements were evaluated:
- Location of the gore area (the area needed for cars to recover if they miss the exit) for the westbound US 6 off-ramp;
- Location of the taper area (speed change transition area where pavement width increases or decreases as cars enter or exit a traffic stream) for the westbound US 6 off-ramp;
- Distance of separation between the frontage road
 and off-ramp;
- Length of the deceleration lane for the loop ramp;and
- Inclusion of an auxiliary or add lane on Wadsworth associated with the northeast off-ramp.
- As described in Exhibit 4-10, none of these design
 elements could be modified enough to avoid impacts to
- ³⁴ historic properties without compromising the purpose
- 35 and need for the project.

- 36 In addition to modifying design elements, the project
- 37 team evaluated moving the houses at historic
- properties 5JF3548, 5JF3549, and 5JF4542 farther
- 39 back on their existing lots and maintaining the
- 40 properties in residential use rather than demolishing
- 41 the buildings. After evaluating this option, CDOT
- 42 determined that moving the houses is not a practicable
- 43 avoidance or minimization measure. Moving the
- 4 properties would diminish the historic integrity of the
- 45 resources to the point that they would no longer be
- 46 eligible for listing in the NRHP (and thus, the properties
- 47 would no longer qualify for Section 4(f) protection) and,
- 48 therefore, would not minimize harm to these properties.
- 49 While measures to avoid, minimize, or reduce impacts
- 50 to the four historic properties could not be incorporated
- si into the project, compensatory mitigation measures for
- 52 demolishing the properties have been included in a
- 53 Memorandum of Agreement (MOA) among CDOT,
- $_{\rm 54}$ FHWA, Colorado SHPO, and Lakewood. This MOA
- 55 was prepared in accordance with the Section 106
- 56 consultation process. Mitigation measures focus on
- $_{\mbox{\scriptsize 57}}$ those that will add to the local historical record and
- 58 support Lakewood's historic preservation goals,
- 59 including an interpretive sign and educational website.
- 60 The MOA is expected to be finalized before CDOT and
- 61 FHWA make a final decision about the US
- 62 6/Wadsworth project.

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EXHIBIT 4-10: DESIGN FEATURES OF THE TIGHT DIAMOND WITH LOOP INTERCHANGE AND CONSIDERATION OF IMPACTS TO SECTION 4(f) RESOURCES



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