
APPENDIX B

AGENCY COORDINATION

Chronologies of letters and minutes by federal and state agencies included in this appendix

Multiple Resource Agencies

January 19, 2004	Invitation letters to resource agency scoping meeting sent to 11 agencies
February 26, 2004	Attended by EPA, USFWS, SHPO, RTD, and DRCOG
May 2, 2006	Attended by USACE, USFWS, and CDOW
April 10, 2007	Field meeting with EPA, USACE, and CDOW
July 27, 2007	Response memo to comments from the April 10 th field meeting

U.S. Army Corps of Engineers (USACE)

January 13, 2004	Scoping Meeting with FHWA and FTA
January 21, 2004	Letter of invitation from CDOT to scoping meeting for resource agencies
February 5, 2004	Letter from FHWA and FTA to USACE requesting them to be cooperating agency
March 5, 2004	Letter from USACE accepting FHWA invitation to be cooperating agency
April 21, 2004	Meeting with FHWA, FTA, EPA, and CDOT
June 14, 2004	Meeting with FHWA, EPA, and CDOT
December 8, 2004	Meeting with FHWA and EPA to discuss purpose and need, alternative screening process
March 2, 2005	Meeting with FHWA to discuss purpose and need, and evaluation criteria for screening
May 11, 2005	Meeting with FHWA, USFWS, and EPA to concur on purpose and need and discuss Level 2 screening
July 19, 2005	Transmittal letter from FHWA to USACE for Purpose and Need Statement
July 25, 2005	Letter from USACE to FHWA concurring on Purpose and Need Statement
May 15, 2006	Meeting to update USACE on status of the 404 Merger Process
August 4, 2006	Letter from FHWA to USACE requesting concurrence on alternatives for detailed evaluation
August 9, 2006	Letter from USACE to FHWA concurring on alternatives for detailed Evaluation
July 29, 2008	Letter from USACE to CDOT concurring with Wetland Delineation Report, Corps File No. 200480110

Environmental Protection Agency (EPA)

January 21, 2004	Invitation to scoping meeting for the Resource Agency Team
April 21, 2004	Meeting with FHWA, FTA, USACE, and CDOT (see minutes in the USACE section)
May 17, 2004	Letter with 11 pages of scoping comments to FTA and FHWA
June 14, 2004	Meeting with FHWA, USACE, and CDOT (see minutes in the USACE section)
July 15, 2004	Meeting at EPA to discuss scoping comments
December 8, 2004	Meeting with FHWA and USACE to discuss purpose and need, alternative screening process (see minutes in the USACE section)

May 11, 2005 Meeting with FHWA, USFWS, and USACE to concur on purpose and need and discuss Level 2 screening (see minutes in the USACE section)

Federal Railroad Administration (FRA)

January 21, 2004 Invitation to scoping meeting for the Resource Agency Team
March 1, 2004 Scoping Meeting at FRA
March 10, 2004 Letter from FHWA and FTA to FRA requesting them to be cooperating agency
April 5, 2004 Letter from FRA agreeing to support the study as required

U.S. Fish and Wildlife Service (USFWS)

January 21, 2004 Invitation to scoping meeting for the Resource Agency Team
February 20, 2004 Letter from USFWS to CDOT with review comments on the Notice of Intent

U.S.D.A. Natural Resources Conservation Service (NRCS)

October 27, 2004 Letter sent to four District Offices of the NRCS requesting lists of any soils that are Prime or Unique Farmland, and/or Farmlands of Statewide or Local Importance
October 29, 2004 Letter from the NCRS Platte Valley District
November 1, 2004 Letter and list from the NCRS Greeley Field Office
September 4, 2007 Letter sent to four District Offices of the NRCS presenting impacts to Prime and Important Farmlands, and requesting return of the Farmland Conversion Impact rating form
October 9, 2007 Letter with rating form for Larimer County
October 2007 Conversion Impact rating form for Boulder/Broomfield County
October 2007 Conversion Impact rating form for Adams County
October 2007 Conversion Impact rating form for Weld County

State Historic Preservation Officer (SHPO)

April 20, 2004 Letter from FTA/FHWA to 31 indian tribes, inviting them to be consulting parties in Section 106 process
May 12, 2004 Kiowa Tribe of Oklahoma agrees to be a consulting party
July 20, 2004 Letter from FTA/FHWA to four other tribes, inviting them
August 2004 Sec.106 Tribal Consultat. Interest Response Forms received from 3 tribes
January 29, 2007 CDOT letter to SHPO for review of Area of Potential Effects (APE)
March 12, 2007 CDOT letter to SHPO clarifying APE boundary, requesting agreement on it
May 1, 2007 Letter from CDOT to 13 preservation organizations inviting them to be consulting parties
May 4, 2007 Letter from Greeley Historic Preservation agreeing to be a consulting party
June 26, 2007 Letter to CDOT from Fort Lupton re: access to a park
August 8, 2007 Letter to CDOT from the City of Greeley re: determinations of not eligible
August 21, 2007 Letter to CDOT from the SHPO with questions on 12 resources
October 4, 2007 CDOT letter to SHPO with information in response to the August 21st letter
January 7, 2008 SHPO letter to CDOT concurring on eligibility of two neighborhoods
October 6, 2008 CDOT letter to SHPO regarding additional determinations of eligibility for five properties

Colorado State Parks

December 1, 2006 Request for confirmation of parcels acquired with any Land and Water Conservation Funds
January 22, 2007 Second letter of request
March 8, 2007 Request for concurrence that the build alternatives would not impact any properties where LWCF monies were used

Colorado Division of Wildlife (CDOW)

January 21, 2004 Invitation to scoping meeting for the Resource Agency Team
May 2, 2006 Attended a meeting with FHWA, USACE and USFWS on any agency concerns or new methodologies (see minutes in the USACE section)

Colorado Department of Public Health & Environment (CDPHE)

January 19, 2004 CDOT invitation letter to resource agency scoping meeting
February 20, 2007 Meeting with FHWA, NPS, EPA, and CDOT on air quality in Rocky Mountain National Park

Colorado Department of Revenue

December 8, 2006 Letter to four Dept of Revenue personnel transmitting technical memo for the new Port of Entry near Ft. Collins

Colorado Geological Service

January 21, 2004 Invitation to scoping meeting for the Resource Agency Team

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STATE OF COLORADO

DEPARTMENT OF TRANSPORTATION

Region Four
1420 2nd Street
Greeley, CO 80531

(970) 350-2146
(Fax) 350-2198



Distribution list is attached.

January 19, 2004

«fname» «lname»
«title»
«agency»
«dept»
«add1»
«add2»
«citystatezip»

**Re: North I-25 Front Range EIS
Invitation to a Resource Agency Meeting**

Dear Mr. «lname»:

The Colorado Department of Transportation has issued the Notice to Proceed with the North I-25 Front Range Environmental Impact Statement (EIS) process in CDOT Region Four and the Notice of Intent was published in the Federal Register on December 31, 2003. The goal of this project is to prepare an EIS evaluating future transportation alternatives and improvements for the I-25 corridor between Denver and Fort Collins.

Alternatives under consideration include:

1. Taking no action.
2. Improvements to the existing highway network, particularly I-25 but perhaps also US 85 and US 287.
3. Transit options including bus and rail technologies.
4. Constructing a highway at a new location.

We would like to invite you or your designated representative to participate in the scoping meeting for the Resource Agency Team. This meeting will be:

**Thursday, February 26, 2004
2:00 p.m. to 4:00 p.m.
Loveland CDOT Office
2207 E. Highway 402
Loveland, CO 80537**

At this meeting we will provide a summary of our process and would request your input on any particular issues you wish us to study or processes you wish us to follow.

We look forward to working in a partnership with you to conduct this EIS and determine the best transportation options for Northern Colorado.

Sincerely,

David M. Martinez
Project Manager
CDOT N. I-25 Front Range EIS

cc: Project File



NORTH I-25 FRONT RANGE EIS Resource Agency Contact List (11)

David Noe
Chief of Engineering Geology
Colorado Geological Survey
1313 Sherman Street, Room 715
Denver, CO 80203

Suzette Thieman
Transportation Planning Manager
North Front Range MPO Offices
235 Mathews Street
Fort Collins, CO 80524

Aaron Linstrom
Terrestrial Biologist
Colorado Division of Wildlife
Denver Service Center and
Northeast Region Office
6060 Broadway
Denver, CO 80216

Howard Roitman
Acting Director of Environmental
Programs
Colorado Department of Public
Health and Environment
HMWMD-ADM-B2
4300 Cherry Creek Drive South
Denver, CO 80246-1530

Deborah Lebow
Environmental Protection Agency
NEPA—EcoSystem Protection
Mail Stop 8EPR-EP
999 18th Street
Denver, CO 80202

Alison Deans-Michael
U.S. Fish and Wildlife Service
755 Parfet, Suite 361
Lakewood, CO 80215

Tim Carey
U.S. Army Corps of Engineers
Tri-Lakes Project Office
9307 S. Platte Canyon Road
Littleton, CO 80128

Steve Fender
Principal Regional Inspector
Federal Railroad Administration
555 Zang Street, Suite 263
Denver, CO 80228

Dan Corson
State Historic Preservation Office
1300 Broadway
Denver, CO 80203

Scott Weeks
Regional Transportation District
1600 Blake Street
Denver, CO 80202

George Scheuernstuhl
Denver Regional Council of
Governments
4500 Cherry Creek Drive South, Suite 800
Denver CO 80246-1531

MEETING MINUTES

- Project:** North I-25 Front Range EIS
- Purpose:** Resource Agency Scoping Meeting
- Date Held:** February 26, 2004
- Location:** CDOT Region 4, Loveland Residency
- Attendees:**
- CDOT:** Pete Graham, Bob Garcia, David Martinez, Beth Chase, Carol Parr
 - EPA:** Robert Edgar, Deborah Lebow
 - SHPO:** Amy Pallante
 - DRCOG:** Jennifer Edwards
 - RTD:** David Krutsinger
 - FTA:** John Dow
 - FHU:** Tom Anzia
 - FHWA:** Jean Wallace
 - USFWS:** Alison Michael
 - C&B:** Kim Gambrell, Gina McAfee, Wendy Wallach
- Copies:** Attendees, Stan Elmquist, Holly Miller, Gail Keeley, Kirk Webb, Art Hirsch, File #071609.400
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SUMMARY OF DISCUSSION:

1. Following introductions, Gina described the five primary purposes for this meeting:
 - a. Describe the project and possible issues.
 - b. Identify sources of information.
 - c. Ask resource agencies to determine significant or non-significant issues.
 - d. Ask agencies to identify any concerns to be evaluated in cumulative effects analysis.
 - e. Consider if the study area is appropriate.

2. Gina then described the project purpose and some of the more important environmental issues to be addressed in the EIS. At the conclusion of this presentation, the resource agency representatives were asked if there were additional questions or concerns to be discussed. These included:
 - a. Robert Edgars, EPA
Question: Who will sign the ROD? What will be screened out during Phase I of the data collection?
Answer: Gina explained the two-tier data collection effort in greater detail.

 - b. Amy Pallante
Question: Will this be a programmatic EIS?
Answer: No.

- c. Deborah Lebow, EPA
Question: Are there any corridor alignments being identified thus far?
Answer: Not really, although we anticipate looking at existing highway and railroad lines.
 - d. Bob Garcia: There is a study titled Weld County's Parallel Corridors Study that looks at alternative corridors to I-25. The project team needs to be aware of this as we proceed.
 - e. Tom Anzia: We've gotten some input on regional travel patterns but not much on local and community travel patterns. We are working to identify community traffic and travel patterns.
 - f. Robert Edgar, EPA
Question: What's the time frame for the study?
Answer: The draft and final EISs will be completed in a little over three years. Travel Demand modeling will have to blend DRCOG and NFRACOG models and a piece of the Upper Front Range planning area, so this will take some time to complete the model. In addition, the sheer size of the study area will require more time.
3. The agency representatives then identified specific issues and concerns to be addressed in the EIS:
- a. RTD had the following comments:
 - Relative to the North Metro Study, we need to look at downstream effects on I-25.
 - FasTracks will probably go to the ballot this November. If it passes, an interregional system will be more feasible.
 - b. DRCOG had the following comments:
 - DRCOG has rail concerns. They are working on 2030 plan. Potentially, they would include FasTracks in transit network, but rail north from Longmont to unknown termini may be included in the transit network as well as rail north from SH 7 to 160th.
 - Metrovision plan identifies I-25 up to eight lanes up to SH 7.
 - The Front Range Commuter Bus Study should be reflected in the North I-25 Study.
 - The DRCOG TAC has requested to review purpose and need. We would likely present them with information in late spring. Jennifer Edwards will be participating in our TAC.
 - c. USFWS
 - Refer to their scoping letter.
 - South Platte water depletion issue—this is an evolving program which is also a big issue for EPA. We will need to work together to identify an approach for this issue.

d. SHPO

- Is the study area the area of potential effect? (No: This won't be determined until Phase II data collection.)
- Would appreciate an early coordination meeting on the data collection methodology. Phase I is usually general reconnaissance and Phase II is where you define the A.P.E. and do an intensive level survey.
- Concerned about secondary effects of highway projects on historic downtown areas of communities, if the widening would increase traffic. (Tom Anzia is also concerned with all modes.) Look at secondary effects under 106.
- Also concerned about land use changes that will result, especially to rural and undeveloped communities.
- At what stage will Section 4(f) properties be identified? We will start looking at potential 4(f) properties immediately but won't do eligibility determinations until Phase II data collection.

e. EPA offered the following comments:

- Other ongoing studies include the North Front Range Step Up Study (an FHWA pilot program looking at transportation and land use). These findings should be included in our analysis.
- Very happy we're looking at the Ozone Early Action Compact and using the Delphi technique on induced growth.
- EPA will comment on the Purpose and Need statement. On other projects, EPA is looking to simplify those statements. Gina said we are trying to finalize this so the sooner we can get input, the better.
- EJ needs to be addressed in this study area. Project Team will develop several possible approaches and coordinate with EPA on this. This methodology needs to be consistent with US 36 Corridor and I-70 East Corridor EIS. North I-25 will include specialized targeted outreach; we have already begun to identify potential areas for outreach. Bob said we should look at EJ done for the US 287 EA.
- South Platte water depletion is important to EPA right now. Please work with them to address this.
- What is the highway-widening project along I-25 that's underway now and how does this fit in with the North I-25 study?
- Very glad there are multiple alternatives being considered.
- Need to ensure the public is given an opportunity to comment on issues they can understand. Must compare impacts to the existing conditions, particularly for air quality. Need existing air quality modeled. Give each alternative equal consideration.

- Ozone non-attainment is an issue so reasonable mitigation measures, including measures outside the preview of CDOT, that could mitigate impacts (i.e., stage I and stage II vapor controls for petroleum vapor capture would dramatically reduce NOC emissions) are important. The ROD can include recommendations for mitigation measures outside their control. The public can make comment on this and make suggestions to different entities regarding mitigation.
4. The agency representatives were then asked to provide input on cumulative issues. Secondary and cumulative impacts to historic districts (identified earlier by SHPO). EPA is concerned with:
- Land Use Impacts.
 - Water quality and supply/depletion.
 - Habitat fragmentation for wildlife, associated impacts to wetland and riparian communities.
 - Wetlands.
 - VMT (vehicle miles traveled) impacts on AQ.
5. Following this discussion of Cumulative Effects several additional comments and concerns were raised:
- EPA would like us to figure out impacts to water quality from additional impervious surface using the Driscoll model (for cumulative impacts).
 - Also, EPA feels it would be good to calculate the infrastructure costs of growth.
 - The lack of transit ridership numbers could be addressed through a good survey of potential riders (how much would you pay? How often would you use transit? Etc.). Perhaps this survey could be tied to the travel demand modeling we're doing. Tom feels that the model might be able to shed some light on "mode choice". We need to ensure that we have really defensible transit ridership projections.
 - DOW should be contacted for wildlife migration patterns in the area. Roland Wostl at CDOT is working on mapping some of these areas. This effort is called the "Connectivity Campaign" sponsored by CDOT and FHWA.
 - EPA: Any idea of total wetland acreage in the project area? This is unknown at this time.
 - Alison Michaels said a portion of this project will fall under the "shortgrass prairie programmatic" initiative.
6. At the conclusion of the meeting it was agreed that this larger group should meet again at key points in the project development process, including when preliminary alternatives have been identified and prior to the release of the Draft EIS. Meanwhile, this group will be kept apprised of project progress through newsletters, E-mail updates, and meeting invites.



MEETING MINUTES

Resource Agency Meeting

MEETING DATE: May 2, 2006

LOCATION: SW Weld County Services Complex

ATTENDEES:

CDOT: Sharleen Bakeman, David Martinez, Steve Olson, Carol Parr, Jeff Peterson, Rebecca Pierce, Michelle Rabouin

FHWA: Jean Wallace, Mike Vanderhoof

USACE: Margaret Langworthy

USFWS: Alison Michael

CDOW: Eric Odell

FHU: Gregg Mugele

C&B: Gina McAfee, Wendy Wallach

PREPARER: ~~Carter~~ **Burgess**
Wendy Wallach

COPIES: Attendees, Dave Beckhouse, Dave Shelley, Lee Cryer, Bob Garcia, Stan Elmquist, Tom Anzia, Gayl Harrison, Steve Butler, Ron Beane, Lindsey Larson, Kim Podobnik, Bob Quinlan, Jill Schlaefer, C&B File #071609.400

MEETING SUMMARY

1. Introductions were made.
2. Gina stated the purpose for the meeting—to obtain new input regarding concerns, and new methodologies. She reviewed the study area and the phased data collection approach. She reviewed the Purpose and Need: safety, capability, mobility, and infrastructure.
3. Public and agency scoping was conducted and conceptual alternatives analysis has been completed. There are two lead federal agencies: FTA and FHWA. Alternatives advanced include additional general-purpose and managed lanes, commuter bus, BRT, commuter rail, improved interchanges and stations. The commuter rail vehicle type has not been selected. The No-Action Alternative includes: bridges, drainage structures, minor improvements.
4. We are still evaluating sites for station locations. The team is exploring the possibility of single tracking for portions of the commuter rail component. From Longmont east to SH 7 the rail would be in a new right-of-way.

**MEETING MINUTES**

information. cooperation. transportation.

*Resource Agency Meeting**May 2, 2006**2 of 4*

5. Commuter bus includes bus stations (parking and drop off). This alternative includes feeder bus service which would be local system to feed bus or rail.
6. Mike Vanderhoof asked about right-of-way preservation shown on the study area map. Gina answered that this is part of FasTracks; right-of-way is set aside for future transit use.
7. There are maintenance facilities associated with each alternative package; size will be determined by operating plans.
8. Gina passed out the summary of public meetings held in January and February 2006. Twelve meetings have been held with average attendance of 30 people.

Summary of public meetings:

- Comments on interchange configuration
 - People felt 2030 was not far enough for evaluation.
 - How is fuel factored into this?
 - Travel time of each mode.
 - How was transit selected (i.e., CR on western alignment versus CR on central alignment). What technology ended up where?
 - How will the study affect land use?
9. Since the town hall meeting, there have been a series of interchange reconstruction meetings. There are also transit station working groups. We are also working closely with local jurisdictions while siting stations.
 10. Gina asked about South Platte River water depletion methodology. Alison said methodology is still undetermined, but she is anticipating it will be complete in late summer. First, determine whether or not we are using water from the South Platte River—for compaction or dust suppression. Compare historical water use versus new depletion; there may be some actions grandfathered in.
 11. Environmental Justice (EJ): Gina reviewed what next steps are related to EJ. Small group outreach will occur soon. She noted areas where there may be special outreach conducted to Hmong populations. Sharleen said to work with Jonathan at CDR who did this for US 36. We are working to map concentrations of potential EJ areas and then select meeting locations, meet and document concerns. We will meet with the Steering Committee after we solicit input, but will invite Michelle Rabouin to a project team meeting in the interim.
 12. Water Quality: Will not be using DRISCOLL model. Art has met with EPA and devised his own model. Copies of this methodology were available at the meeting.
 13. Induced Growth: Concern from public, TAC and RCC. We are planning a methodology similar to other projects—Delphi Plus. Land use could be changed as a result of these



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*Resource Agency Meeting
May 2, 2006
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alternatives. We will look at what environmental resources could be impacted by changes in land use. We have asked local agencies in station working groups about what kind of changes in land use could be associated with the North I-25 proposed improvements. These will be documented as part of the Delphi Plus methodology.

Sharleen stated we may have to revisit this issue; they are (CDOT) having a meeting with EPA on these kinds of issues. Sharleen said we don't need to wait for this meeting. It is more about defining roles and responsibilities. We may want to address this at a future meeting.

Mike Vanderhoof asked if we are still working with local communities about growth. Gina said local agencies will play a role on the panel and provide additional input.

14. Air Quality: This area is part of the early action compact for ozone. There are also several maintenance areas and nitrogen deposition at RMNP. We will use the new MSAT guidance on this project because we are adding capacity.

Mike Vanderhoof asked how to deal with NO₂. Gina said we will likely do total burden analysis similar to MSAT. Mike said it is an "upslope phenomena coming out of the Front Range." We may need to revisit air quality methodology with agencies.

15. Wetlands: We are in the process of doing delineations. We will come up with impacts and avoidance and minimization and then work with the Corps, EPA, and USFWS. We have a merger meeting with the Corps on May 15. Also, Gina mentioned looking at avoiding resources at the 392 interchange.

16. Wildlife: DOW said the big issue is more of a fishery issue: aquatic species impacts. Contact Eric Odell to schedule a meeting with the three project biologists. We should sit down with them to review conceptual design.

Mike asked about SREP incorporating the "linking landscapes" study. We should review the SREP report to determine if there are corridors in our project area—make sure we incorporate considerations.

17. STEP UP, NFRMPO: Make sure we work in STEP UP information. Alison said we should evaluate our alternatives to determine effect to growth as it related to areas specified in the STEP UP plan. Gina said we will identify areas that could be subject to development impacts and we could flag these areas for CDOW, NFRMPO, and locals. We will plan a subsequent meeting to discuss those possible impacts.

Mike Vanderhoof said it would be interesting to see if we target some corridors designated for protection by SREP. Are we looking at this as the cornerstone of our mitigation? Gina said since we do not yet know our impacts, we do not yet know mitigation. There are

**MEETING MINUTES**

Resource Agency Meeting

May 2, 2006

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places where we may choose to concentrate mitigation. Mike would like to start having this conversation soon—the earlier the better.

18. Gina asked if there were other issues.

- DOW—more general issues, MBTA, raptor, nesting area. We want to be aware of these issues. They are documented in the previous scoping letter provided by USFWS.

19. Mike asked about the status of the schedule: We are in the process of surveying wetlands and cultural resources. Impacts won't be known until later this year or early next year.

20. Gina talked about potential impact areas: noise and vibration, EJ, wetlands, cultural resources, and Section 4(f).

21. Michelle asked about the summary of town hall meetings. She would like to review the answers to questions. The team is working on categorizing and summarizing them. General summary will be posted on the Web site and distributed to this group.

22. Sharleen said there is robust conversation within TAC and RCC. She said we get regular feedback and this is quite an involved process so these packages have come down through that. Dave Martinez talked about the interactive workshop held with TAC/RCC to make sure we covered everything. He thinks we really captured everyone's desire in these two packages.

23. Gina said the biggest challenge is disconnect between what people want (transit) and what we can easily provide, because there are no funding mechanisms for transit and ridership forecast is just not there. Census data showed that it is a very dispersed population and employment is very dispersed.

ACTION ITEMS:

- Follow-up with USFWS in early fall to obtain South Platte River water depletion issues. (Quinlan)
- Invite Michelle Rabouin to project progress meeting this summer after we start concentrated EJ outreach. (Wallach)
- Coordinate with Sharleen on induced growth after CDOT meets with EPA. (McAfee)
- Revisit air quality methodology with agencies. (Schlaefer)
- Contact Jonathan at CDR about Longmont EJ outreach. (Wallach)
- Schedule a meeting with the Division of Wildlife to review station locations. (Butler, ERO)
- Distribute Public Meetings Q&A Summary to the group. (Larson)

AGENDA

Section 404 Resource Agencies Field Meeting

Tuesday, April 10, 2007; 9:00 a.m. to 12:00 p.m.

Meet at Park-n-Ride at the southeast quadrant of
US 119 and I-25 Interchange for tour in a van.

PURPOSE OF MEETING

1. Review Waters of the U.S.; including wetland delineation, types and functions.
2. Review design alternatives, avoidance and minimization, and potential impacts.
3. Receive comments from COE / EPA / USFWS / CDOW.

AGENDA

9:00 AM Van tour begins

- ▶ Meeting location—US 119 and I-25 Interchange Park-n-Ride
- ▶ Wetland site for review—St. Vrain River crossing of SH 119
- ▶ Topic—Impact to roadside wetlands along SH 119 by commuter rail track.

10:00 AM

- ▶ Meeting location— I-25 Frontage Road and St. Vrain River Crossing
- ▶ Wetland site for review—St. Vrain River
- ▶ Topic—Impact to St Vrain River by I-25 highway improvements. Is there potential for wetland mitigation at St. Vrain State Park?

10:30 AM

- ▶ Meeting location— I-25 Frontage Road and Big Thompson River Crossing
- ▶ Wetland site for review— Big Thompson River
- ▶ Topic— Impact to Big Thompson River by I-25 highway improvements. Is there potential for wetland mitigation at Big Thompson State Wildlife Area?

11:30 AM

- ▶ Meeting location—I-25 rest area, (southbound I-25, north of Poudre River Crossing
- ▶ Wetland site for review—Poudre River
- ▶ Topic— Impact to Poudre River by I-25 highway improvements. Is there potential for wetland mitigation at Arapaho Bend Natural Area or rest area?

12:00 PM

- ▶ Meeting ends, return to parking area.

Invitees:

Margaret Langworthy, COE
Alison Michael, USFWS
Sarah Fowler, EPA
Chad Morgan, CDOW
Larry Rogstad, CDOW
Ron Beane, ERO
Dave Beckhouse, FTA

Kendra Gabbert, FHU
Tom Anzia, FHU
Jeanne Sharps, FHU
Carol Parr, CDOT
Jim Eussen, CDOT
Rebecca Pierce, CDOT
Long Nguyen, CDOT

Danielle Smith, C&B
Gina McAfee, C&B
Bill Knapp, C&B
Wendy Wallach, C&B
Diane Yates, C&B

MEETING MINUTES

Section 404 Resource Agencies Field Meeting

MEETING DATE: April 10, 2007

LOCATION: Wetland locations along North I-25 Interchange

ATTENDEES: C&B: Bill Knapp, Wendy Wallach, Gina McAfee, Diane Yates
ERO: Steve Butler, Ron Beane
EPA: Sarah Fowler
COE: Margaret Langworthy
FHU: Kendra Gabbert, Jeanne Sharps, Tom Anzia
CDOT: Jim Eussen, Carol Parr
CDOW: Chad Morgan, Larry Rogstad, Mark Leslie

PREPARERS: Diane Yates, Wendy Wallach

ATTACHMENTS: Meeting handout (9 sheets)

COPIES: Attendees, Bob Garcia, Steve Olson, Rebecca Pierce, Dave Martinez, Long Nguyen, Alison Michaels, Dave Beckhouse, Danielle Smith, Gayl Harrison, C&B File #071609.400

MEETING SUMMARY

Purpose of Field Meeting

- To review wetland delineation at I-25 and major river crossings
- To review current designs for the two build alternatives (Package A & B), avoidance and minimization measures, and potential impacts.
- To receive comments from U.S. Army Corps of Engineers (COE), Environmental Protection Agency (EPA), and Colorado Division of Wildlife (CDOW). U.S. Fish and Wildlife Service representatives were unable to attend.

Field Meeting Agenda

Meeting participants met at the I-25 / US 119 park-n-ride to board a large van for the project tour. All agency representatives (CDOT, COE, EPA and CDOW) were able to ride in the van with most of the natural resource specialists, highway engineers and environmental planners from the North I-25 team, allowing project discussions while traveling between each tour stop.

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*Section 404 Resource Agencies Field Meeting
April 10, 2007
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A handout was distributed, containing a summary of the project's wetland resources and mapping methods, descriptions of the DEIS design alternatives, estimated impacts, and design strategies used to avoid impacts. Large plots of the design plans for each tour site were shown to the group to describe the proposed highway or rail improvement.

Diane Yates (DEIS team) began the tour by explaining that the four stops were selected for their water quality and wetland perspectives, and to view the major river crossings effected by the I-25 and commuter rail alternatives currently under evaluation by the DEIS: No Action, Package A and Package B. The four stops were also selected because they represent the areas of greatest potential impact.

COE asked about the estimated wetland impact areas for the project. Diane Yates replied that the existing wetland area for Package A is 633 acres with 32 acres of wetland impact. Package B has 233 acres of existing wetlands with 21 acres of wetland impact. Most impacts to important wetlands are at river crossings. The COE's reaction to the large area of impact by both packages is that we should work harder to try to minimize these. Methods to avoid wetland impact should be explored further.

STOP #1: COMMUTER RAIL ALONG SH 119 at ST VRAIN RIVER CROSSING

Proposed Improvements: Commuter rail tracks would be built south and parallel to SH 119, crossing the St. Vrain River bridge. CDOT will be replacing the eastbound bridge within the next year.

Wetland and other site conditions: Scrub shrub wetlands and riparian areas are located on both banks of the river.

Methods to Avoid and Minimize Wetland Impacts: Rail tracks designed for the south side of SH 119 will avoid the larger wetlands and 4(f) properties on the north side of SH 119. Wetlands associated with the St. Vrain Creek corridor are located throughout the area; much design effort was made to locate the rail corridor where it would have the least impact to wetlands.

Agency Comments and Mitigation Options:

- A recreation trail is planned along the St. Vrain River.
 - A pedestrian crossing is proposed for SH 119.
 - Ron Beane said the entire riparian area along the St. Vrain Creek is a winter roosting area for bald eagle, on both sides of 119. There is a communal roosting area located south of 119 on Boulder Creek. If the rail alignment is on the south side of 119, it would be closer to this communal roosting area, but still more than ½ mile away.
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- There is a bald eagle mitigation area at the Boulder Estates gravel pit mining reclamation area, near Boulder Creek. The gravel mine is putting up two posts at this site to mitigate for the impacted trees that are used for perching.
- There is also an active nest site near the confluence of Boulder Creek and Idaho Ditch a little more than 1 mile south of the 119 bridge.
- The city of Longmont Parks and Recreation also has a mitigation area nearby.
- The St. Vrain serves as a wildlife crossing of SH 119. The agencies asked if new bridges for SH 119 and commuter rail can incorporate a wildlife crossing. COE asked if this was a significant wildlife migration location, because the wildlife crossing could count as mitigation for the North I-25 project by improving the value of wildlife habitat for the existing wetlands and river corridor. COE referenced SH 285 as an example of a wildlife crossing.
- CDOT answered that only the eastbound bridge will be replaced, and CDOT will try to incorporate a wildlife crossing in the highway project. Team engineers said the crossing would be under the SH 119 bridge spans and would require widening and raising the spans to allow deer to cross. CDOW said 10-foot would provide sufficient height of the crossing. Engineers said it's possible for 7 to 8-foot height to be made without changing the superstructure, using soil nail walls and providing bank stabilization. Carol Parr to send updated animal-vehicle collision data to Ron Beane.

STOP #2: I-25 CROSSING at ST VRRAIN RIVER

Proposed Improvements: Package B proposes widening I-25 toward the center median. Package A does not include improvements along this section of I-25. No change to the Frontage Road or bridge. During summer 2007, the I-25 bridges will be reconstructed.

Wetland and other site conditions: Scrub shrub wetlands and riparian vegetation line the banks of the St. Vrain River.

Agency Comments, Methods to Avoid and Minimize Wetland Impacts, and Mitigation Options:

- COE asked about fill impacts. There will be no impacts from fill, everything is on structure or impacts will be temporary.
 - COE asked about the difference between Package A and B. At this location, Package A assumes the capacity will be okay with the current widening project; no improvements are proposed for I-25 between SH 52 and SH 66. Package B will add 1 tolled express lane in each direction.
 - We talked about the current Region 4 project and wetland impacts associated with this. Region 4 will be requesting a nationwide Sec 404 permit for this project. Terry McKee determined jurisdictional wetlands to be less than 1/10 of
-

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an acre. This project has complete independent utility from the North I-25 EIS project. R4 Environmental personnel met with CDOW personnel approximately one year ago to discuss the drop structure east of the frontage road bridge. Division personnel were concerned about the structure being a barrier to fish passage. Any changes to the drop structure WILL NOT be included in the current construction on I25, but will be part of the DEIS design. COE said this change is an enhancement, increasing aquatic habitat function; so take credit for this improvement.

- Diane Yates asked if there are opportunities to provide mitigation at St. Vrain State Park. Agency representatives said there are opportunities at the State Park but there are problems because the wetlands are isolated. The COE would be reluctant to accept mitigation if the wetland mitigation is not in-kind or under the jurisdiction of the State Park. If the wetlands mitigation is connected or adjacent to impacted wetlands, they may be available for enhancement by creating canopy layers.
- CDOT would like to create buffers to the State Park that also support St. Vrain River.
- COE said ratios for preservation area 10:1. To provide more mitigation credit, the project would need enhancement with native vegetation and other efforts to improve the existing wetlands. Enhancement credit ratios are 4:1.
- COE asked if the bridge span will be made longer at this location because she noticed the passage under the bridge is narrow. This project widens the proposed reconstructed bridges toward the median and does not increase the existing span length.
- COE asked if deer are in the area. CDOT would lengthen the bridge span for wildlife. Ron Beane said increasing the span would help but this area is not an important wildlife area. At this point, a longer span would not reap benefits for large game but would benefit small animals.

WATER QUALITY PONDS I-25 (not on tour, general project question)

Proposed Improvements: Water quality ponds are designed for low collection areas along the I-25 highway alignment. Some ponds are designed for the river floodplains.

Methods to Avoid and Minimize Wetland Impacts: Ponds would be located outside of wetland boundaries.

Agency Comments:

Diane Yates asked if existing wetlands can receive water from water quality ponds. COE and EPA said yes, as long as the water discharged to the wetland is pre-treated. A

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fore-bay must be integrated with the water quality pond and both should not be in the park / 4(f) property.

I-25 CROSSING at LITTLE THOMPSON RIVER (not a stop on the tour, but discussed from review of design plans)

Proposed Improvements: Highway would be moved to the west and widened. Frontage Road would not change. Safety median is 80-foot wide. Interchange with SH 392 was pulled in to avoid wetlands.

Wetland conditions: Scrub shrub wetlands line banks of the Little Thompson River.

Methods to Avoid and Minimize Wetland Impacts: Water quality ponds moved outside of wetlands.

Agency Comments and Mitigation Options:

- COE asked if anything can be done to enhance the buffer to Little Thompson River wetlands

STOP #3: I-25 CROSSING at BIG THOMPSON RIVER

Proposed Improvements: For Package A and B, I-25 was widened east and west, maintaining the rural median width of 80 feet. Proposed US 24 exit/entrance ramps extend south of the Big Thompson River crossing, making the width of the highway more than twice the existing I-25 width. The Frontage Road would be placed adjacent to I-25 with a barrier separation in lieu of the normal 40-foot ditch section.

Wetland and other site conditions: Wetlands line the river bank; extend across the floodplain and along I-25 roadside ditch. Big Thompson Ponds State Wildlife Area (BTP SWA) is adjacent to river and I-25 to the west. This area is Preble's meadow jumping mouse habitat.

Methods to Avoid and Minimize Wetland Impacts: Jeanne Sharps said retaining walls were added to the west and east sides of I-25, ramp alignment was modified, and river crossing designed with bridges instead of culverts, to avoid wetland and 4(f) property

Agency Comments and Mitigation Options:

- CDOW does not want the highway to expand west into the State Wildlife Area or west into the riparian area along the Big Thompson, adjacent to the roadway. The cottonwood riparian area provides nice riparian habitat, COE agrees.
 - Engineers said I-25 improvements follow design standards by maintaining the rural design standards (80-foot center median) and widening to the outside.
-

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COE said the project design must document that the least environmentally impact alternative was selected and impacts to wetlands were avoided and minimized. EPA suggested considering a design exception to the rural design standard to avoid impacts.

- COE likes the idea of mitigating at the reclaimed gravel mine sites near Big Thompson if the CDOW is purchasing the reclaimed mine property.
- COE asked CDOW about mitigation options at Big Thompson Ponds State Wildlife Area (BTP SWA). CDOW said a large gravel pit mine operation (Flying W Gravel Pit) is planned for property next to the BTP SWA and west of I-25, to be mined by Jake Kauffman and Sons, Inc. After mining is complete, the property owners would like to reclaim this site and add it to the BTP SWA. CDOW said this addition would add wildlife habitat value to the BTP SWA. The gravel operation is planned for a 10-20 year operation. A permit has been issued to State Mineral and Geology Department, but a Sec 404 permit has not been requested, perhaps because there are no jurisdictional wetlands on site and no federal nexus. CDOT said currently the North I-25 project does not have funding and may not be complete for 20-30 years; therefore wetland mitigation at the gravel pit may be feasible. COE would get involved if mitigation for North I-25 impacts is considered at this site. This would provide a federal nexus for COE to help monitor site activities.
- We need to locate the WQ pond here so it is not right in the middle of Preble's habitat.

STOP #4: I-25 CROSSING at CACHE LE POUUDRE RIVER

Proposed Improvements: Highway improvements shifted the alignment east of existing highway centerline. The channel of Cache Le Poudre does not hold a 10-year flood flow. If the project improves the I-25 bridges for more flood flow capacity, land uses along the river downstream of the bridge would be at risk of flooding. This highway improvement meets the rural design criteria.

Wetland and other site conditions: Wetlands line the riverbanks and extend along the floodplain on east side of I-25. City of Fort Collins owns property immediately west of I-25, its potential 4(f) property. Abandoned CDOT rest areas are north of the river crossing.

Agency Comments and Mitigation Options:

- CDOW suggested these potential wetland mitigation sites:
 - Landowner near Timnath
 - Larimer County open space
 - North of SH 392 in Bluff area
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Section 404 Resource Agencies Field Meeting

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- Arapahoe Bend Natural Area
- COE suggested wetland restoration in Ft. Collins 4(f) recreation property southwest of Poudre River / I-25 crossing.

ACTION ITEMS

- FHU to explore and document design variations at the St. Vrain and the Big Thompson rivers with the intent to minimize impacts to wetlands and Preble's meadow jumping mouse habitat. (Riparian habitat). This information will be included in the DEIS.
- Carol Parr to send updated animal-vehicle collision data to Ron Beane.

NORTH I-25
EIS

information cooperation transportation

SIGN IN SHEET

Wetland Agencies Field Meeting
April 10, 2007

SIGN-IN SHEET

Name	Agency	E-Mail Address
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Carol Parr	CAOT	carol.parr@dot.state.co.us
Ron Beane	ERO	rbeane@ero.resources.com
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Larry Rogstad	CDOW	larry.rogstad@state.co.us
Mark Leslie	CDOW	mark.leslie@state.co.us

NORTH I-25 EIS

information. cooperation. transportation.

MEMORANDUM

To: Margaret Langworthy, COE; Sarah Fowler, EPA; Jim Eussen, CDOT; Carol Parr, CDOT; Larry Rogstad, CDOW; Chad Morgan, CDOW; Mark Leslie, CDOW; Tom Anzia, FHU; Kendra Gabbert, FHU; Jeanne Sharps, FHU; Steve Butler, ERO; Ron Beane, ERO

cc: File

From: Jeanne Sharps, P.E., Tom Anzia, P.E., Wendy Wallach, & Carol Parr

Date: July 27, 2007

Subject: Responses to Comments Raised During the April 10, 2007 Section 404 Resource Agencies Field Meeting Regarding Avoidance, Minimization, and Mitigation of Wetland Areas Potentially Impacted by the North I-25 project

Introduction

This memorandum is in response to concerns raised by the U.S. Army Corp of Engineers (USACE), Colorado Department of Wildlife (CDOW) and the Environmental Protection Agency (EPA) regarding avoidance, minimization, and mitigation of wetland areas potentially impacted by the North I-25 project. These concerns were raised during the April 10, 2007 Section 404 resource agencies field meeting (see minutes attached).

The agencies expressed three primary areas of concern on the field trip, where minimization and mitigation was of special interest to them. These are discussed below:

Cache la Poudre River. Wetlands line the riverbank and extend along the floodplain on the east side of I-25. The agencies asked that consideration be given to minimize impacts to the adjacent river banks associated with the widening of the bridge. The agencies asked that the design team explore a design exception at this location in order to narrow the median and lessen the impacts.

Big Thompson River. This wetland area provides an important riparian area with mature cottonwood trees for wildlife habitat. The adjacent Big Thompson Ponds State Wildlife Area is located west of I-25. These areas are considered Preble's meadow jumping mouse habitat. The agencies asked that every effort be taken to minimize impacts to the adjacent river banks associated with the widening of the bridge. The agencies asked that the design team explore a design exception at this location in order to narrow the median and lessen the impacts.

St Vrain River. Wetlands are abundant adjacent to SH 119. The agencies asked if CDOT could increase the vertical clearance at the two bridges (eastbound and westbound) to provide greater height for larger mammals to use as a crossing.

The following is a summary of the wetland impact minimization measures already incorporated in the existing DEIS design at these areas:

Big Thompson River

- Retaining walls were placed on the east and west edges of roadway to contain the highway fill and minimize impacts to the wetlands. Walls extend 100 feet north and south of the wetland areas on both sides of I-25.
- The design standard 40-foot wide ditch between I-25 and the east frontage road was eliminated near the river crossing to minimize impacts to the wetlands. A barrier separation between the roadways was utilized in lieu of the ditch.
- Water quality ponds were placed outside the limits of the wetland areas near the river.

Cache la Poudre River

- Retaining walls were placed on the east edge of roadway to contain the highway fill and minimize impacts to the wetlands. Walls extend 100 feet north and south of the wetland areas.
- Water quality ponds were placed outside the limits of the wetland areas near the river.

St. Vrain River

- The commuter rail tracks are proposed to run along the south side of SH 119 to avoid impacts to larger wetlands on the north side.

In addition to these aforementioned minimization measures, at the request of the agencies the team explored additional opportunities for minimization and mitigation.

Additional Minimization of Wetland Impacts—Median Alternative

Standard rural design allows an 80-foot median for freeways, with a cable median guardrail. A design exception could be made to eliminate the 80-foot median half a mile north and south of the river crossings, and replacing the tensioned cable barrier with a concrete guardrail in the closed median areas.

For the Big Thompson River, the reduction in median width would minimize wetland impact by approximately 1.35 acres. Original impacts under Package A were estimated at 6.17 acres and under Package B were estimated at 4.76 acres. There would be minimal changes to construction and right-of-way costs.

The proposed design alternative at the Big Thompson River introduces a horizontal shift in the roadway alignment, which may be a concern in terms of driver expectancy. West of I-25 the edge of roadway will shift reducing impacts to the State Wildlife Area. Both the alternative design and the original design implement guardrails that differ from mainline options, and both cases include transitions in the design. Thus, there is no appreciable difference in safety conditions for the two alternatives.

For the Cache la Poudre River, the reduction in median width would minimize wetland impact by about 0.5 acre. Original impacts under Package A were estimated at 5.59 acres and under Package B were estimated at 2.14 acres. There would be minimal changes to construction costs, and approximately 15,000 square feet less of right-of-way acquisition.

Mitigation for Wildlife—St. Vrain Crossing

For the SH 119 crossing at St. Vrain River, the COE requested that on the west side of the eastbound bridge CDOT should try to move or position the pier to allow for additional elevation for wildlife movement.

The eastbound bridge is currently under design for replacement by CDOT. The existing elevation will be retained as the new eastbound bridge is designed. Additionally, riprap will be buried and covered with existing substrate to provide a natural surface for wildlife and backwaters will be left in place per CDOW request.

Conclusion

With regard to the Big Thompson and Cache la Poudre crossings, the DEIS environmental analysis will continue to reflect the impacts of the standard median in the original design, since the median design is consistent with both build packages. The DEIS will include this possible option to narrow the median as a mitigation measure to be explored in more detail during the FEIS process. During FEIS design, consideration will be given to incorporating a closed median section at river crossings into the preferred alternative design if other mitigation measures do not adequately minimize impacts. During the design process, potential safety concerns will be thoroughly addressed.

For the St. Vrain crossing proposed within the North I-25 DEIS, CDOT will commit to continued collaboration with the CDOW and COE on other concerns in this geographic area. This could include effects to backwaters by any future design changes and opportunities to minimize impacts to wildlife when and if the local agency constructs a bike path under SH 119 at the St. Vrain bridge.

Meeting Minutes

- Project:** North I-25 Front Range EIS
- Purpose:** Scoping Meeting with the Corps of Engineers
- Date Held:** January 13, 2004
- Location:** FHWA
- Attendees:** FHWA, FTA, CDOT and consultants for numerous corridor projects
- Copies:** Carol Parr, Stan Elmquist, Dave Martinez, Bob Garcia, Tom Anzia, Bob Felsburg, Gina McAfee, Wendy Wallach, Kim Gambrell, Jeanette Lostracco, Laura Backus, Mary Powell, File #071609.300
-

SUMMARY OF DISCUSSION:

1. Tim Carey began the meeting. The Corps is the lead agency for two EISs for water and they are cooperating agency for the Windy Gap Firing Project. They are running out of staff and will not be able to come to individual corridor meeting. They have prepared a scoping letter that can be used for all Colorado projects authorized by the Littleton office. It is attached.
2. The Corps always has some type of federal action (404) associated with transportation projects, so they have to prepare a NEPA document.
3. The Corps is required to comply with the ESA and NHPA.
4. We should provide the Corps with a copy of our purpose and need statement so they can review it. Good examples are Guanella Pass, US 285 (first project), and I-25 South.
5. The Corps requires that an alternative be developed with no impact to Waters of the U.S. (This alternative may be found not practicable.) This is for EAs and EISs.
6. The Corps needs to be involved in the screening of alternatives. We can provide a description of alternatives, screening criteria and initial results in written form or in a meeting.

On design/build contracts, the design and impacts are not nailed down, so the Corps does not like them. On larger projects, the Corps likes to issue a permit for the corridor and then issue a permit amendment as needed. Disadvantages of this could be:

- Wetlands may have changed.
- A greater level of design may be needed during the EIS.

The Corps could put a condition in the permit that before the last phase of the project, you would reassess the wetland conditions. Or you proceed with what was authorized in the permit regardless of what has changed (unless it is the design—and you need to get a permit amendment for that). The Corps will not do separate permits for each phase.

The level of design is up to CDOT to determine what level of risk they are willing to accept. You will need to do enough to determine bridge piers, retaining walls. US 285 was a good example.

7. The Corps looks at:

- Have you avoided as much as you can
- Have you minimized impacts

Only after these have been satisfied can you look at compensatory mitigation.

8. We must submit a complete mitigation plan for the requirements of RGL 02-2. It is okay to have phased mitigation.
9. The Corps would like to see a 404 permit application at the time of the FEIS, as long as they have been involved and EPA has been involved. The Corps would like to see the merged process.
10. On I-70, a FTA person said that commuter rail on I-70 would not be funded. If that is the case, why was rail still a reasonable alternative?
11. The Corps will still do field reviews to verify delineations.
12. The Corps recommends a meeting with them and EPA (Deb and Glen Rodriguez) to discuss purpose and need and alternatives. Before the meeting, the Corps would like to see draft purpose and need and alternatives with screening criteria. Subsequent meetings would be needed just prior to the time that alternatives are screened.
13. For wetland delineations, is it okay to just map wetlands and then do a delineation at the time the preferred alternative is chosen? Tim Carey said it is okay to do the delineation just prior to permit application. From Ron's perspective, you need to delineate wetlands partway through the process. I-70 used color infrared photography with some ground truthing, looking at vegetation and hydrology.
14. The Corps is moving away from mitigation on an acreage basis, but focusing on functional replacement. The Corps is going to use the Summit County methodology used by the Sacramento District. Tim has been working with Kris Meiring to refine this. By the end of 2004 the Corp will have a functional assessment methodology they will be using for individual permits.

**General Scoping Comments
for
Transportation Projects**

**Denver Regulatory Office
U.S. Army Corps of Engineers**

These scoping comments address critical issues that need to be addressed in the Section 404 permit evaluation process. While some of these issues may be addressed through scoping comments provided by other Federal agencies, I've also included them, since we must ensure our permit complies with the Endangered Species Act and National Historic Preservation Act.

I. T&E species (not meant to be all inclusive, just the biggies):

Preble's meadow jumping mouse:

A. Does a "suitable habitat determination" need to be done for Preble's (project located in an area where a suitable habitat determination is required)?

B. If your project is located in a suitable habitat area for Preble's, has a trapping survey been done and approved by the USFWS?

C. Is your project located in designated critical habitat for Preble's?

Ute ladies' tress orchid and Colorado butterfly plant: Is your project located in an area where a plant survey is required? If so, has a survey been done and approved by the USFWS?

Bald Eagle: Are there any eagle nests or roost trees in the vicinity of the project?

II. Historic Properties & Cultural Resources:

A. Are you aware of any cultural or historic resources on-site? Are there any features or structures on the property that may be eligible for listing on the National Register (bridges, barns, houses, railroad embankments, irrigation ditches, etc., that are older than 50 years)?

B. Is your project located in a National Historic Landmark District? Central City, Black Hawk, Georgetown, Silver Plume, and Morrison, as well as other areas, are so designated.

III. 404(b)(1) Guidelines (Guidelines):

Project Purpose and Need:

A. Under the Guidelines, the Corps must determine "basic" and "overall" project purposes. The "basic" project purpose is used to determine if the project is water dependant (Non-water dependant projects are presumed to have less damaging, to the aquatic ecosystem, alternatives). "Overall" project purpose is used to screen alternatives, with selection of the least damaging, to the aquatic ecosystem, practicable alternative required (unless there are other significant adverse environmental consequences).

B. Is your initial project purpose too narrowly or broadly defined? Broad definitions require too many alternatives to be analyzed. Narrow definitions eliminate alternatives that could truly meet your purpose and need.

C. Have you sufficiently demonstrated a public need for the project?

Alternatives:

A. If the discharge involves a special aquatic site (wetlands, mudflats, pool & riffle complexes), are sufficient alternatives presented to clearly select the least damaging, to the aquatic ecosystem, alternative that meets the "overall" project purpose?

B. Have you considered any off-site alternatives? If not, why? (For projects with large-scale impacts, the Corps must consider off-site alternatives. Just because you now have a legal interest in the land (e.g., right-of-way already purchased), or have an option to purchase one, doesn't mean that off-site alternatives can't be considered.)

C. Prior to receiving a permit, you must provide an alternative analysis. The analysis should provide at least 3 alternatives; no build; build; and build with total avoidance of impacts to waters of the U.S. The number of acceptable alternatives varies with the size of the project and value of the aquatic resources to be impacted.

D. We must screen alternatives based on the following criteria:

We can only issue a permit for the practicable alternative that has the least adverse affect on the aquatic ecosystem, so long as there are not other significant adverse environmental consequences. Practicable means capable of being done after taking into consideration cost, existing technology and logistics in light of overall project purposes.

E. Since many transportation projects have an EA or EIS prepared under the auspices of the Federal Highway Administration, is the preferred alternative presented in the EA or EIS the least damaging to the aquatic ecosystem? Is the Purpose and Need correctly defined for our purposes, so as not to eliminate alternatives that would meet our definition of overall project purpose?

Avoidance, Minimization & Compensatory Mitigation:

A. The applicant must demonstrate, and we must verify, that you have avoided and minimized impacts to aquatic resources to the maximum practical extent. This must occur prior to any consideration of compensatory mitigation (compensatory mitigation is necessary to offset unavoidable impacts, after minimizing these impacts).

B. Buffers can be both a form of minimization and compensatory mitigation. Compensatory mitigation includes creation, restoration, enhancement and/or preservation used to offset unavoidable impacts. Buffer areas created merely by moving development areas further away from aquatic resources are considered a form of minimizing impacts. If a buffer area is enhanced, through the planting of native vegetation, shrubs, trees, etc., this enhancement may be counted as compensatory mitigation.

C. How will your proposed compensatory mitigation, as well as remaining aquatic resources, be protected in the future? What's the best method available for protection (deed restriction, conservation easement, fee title transfer of land)?

D. You will be required to submit a complete mitigation plan (meeting the mitigation plan requirements of the Mitigation Regulatory Guidance Letter [RGL 02-2]). We must receive this before a permit can be issued. This is necessary to insure compliance with the RGL 02-2 and the 404(b)(1) Guidelines. Why?

(RGL 02-2) "This guidance applies to all compensatory mitigation proposals associated with **permit applications** (*emphasis added*) submitted for approval after this date (December 24, 2002)." Compliance with the RGL must be determined prior to permit issuance.

(1990 Corps/EPA Mitigation MOA) "If the mitigation plan necessary to ensure compliance with the Guidelines is not reasonably implementable or enforceable, the permit shall be denied." We can't make this determination without a mitigation plan.

IV. Special Aquatic Resources:

A. The U.S. Fish and Wildlife Service has classified fens as Resource Category 1. What this means is that they consider impacts to fens non-mitigatable. The only methods that might be suitable for fen impact mitigation, within our area of Colorado, are restoration of a degraded fen or purchase of mitigation credits from the Warm Springs Mitigation Bank.

B. For activities that may qualify, with project modifications, for authorization by a Nationwide Permit, certain aquatic sites or resources that may require special consideration are fens, springs, important spawning areas, Critical Resource Waters, Wild Trout Waters and Wild and Scenic Rivers.

State of Colorado

DEPARTMENT OF TRANSPORTATION
Region 4 - Loveland Residency
2207 E. Highway 402
Loveland, CO 80537-8885



January 21, 2004

Tim Carey
U.S. Army Corps of Engineers
Tri-Lakes Project Office
9307 S. Platte Canyon Road
Littleton, CO 80128

**Re: North I-25 Front Range EIS
Invitation to a Resource Agency Meeting**

Dear Mr. Carey:

The Colorado Department of Transportation has issued the Notice to Proceed with the North I-25 Front Range Environmental Impact Statement (EIS) process in CDOT Region Four and the Notice of Intent was published in the Federal Register on December 31, 2003. The goal of this project is to prepare an EIS evaluating future transportation alternatives and improvements for the I-25 corridor between Denver and Fort Collins.

Alternatives under consideration include:

1. Taking no action.
2. Improvements to the existing highway network, particularly I-25 but perhaps also US 85 and US 287.
3. Transit options including bus and rail technologies.
4. Constructing a highway at a new location.

We would like to invite you or your designated representative to participate in the scoping meeting for the Resource Agency Team. This meeting will be:

**Thursday, February 26, 2004
2:00 p.m. to 4:00 p.m.
Loveland CDOT Office
2207 E. Highway 402
Loveland, CO 80537**

At this meeting we will provide a summary of our process and would request your input on any particular issues you wish us to study or processes you wish us to follow.

We look forward to working in a partnership with you to conduct this EIS and determine the best transportation options for Northern Colorado.

Sincerely,

David M. Martinez
Project Manager
CDOT N. I-25 Front Range EIS

cc: Project File



U.S. Department
of Transportation

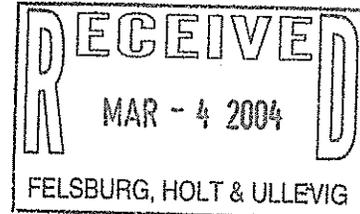
Federal Transit Administration
Region VIII
216 16th Street Mall, Suite 650
Denver, CO 80202
(303) 844-3242

AGENCY - CUC

Federal Highway Administration
Colorado Division
555 Zang Street, Suite 250
Lakewood, CO 80228
(303) 969-6730

February 5, 2004

Mr. Timothy T. Carey
Chief, Denver Regulatory Office Omaha District
U.S. Army Corps of Engineers
9307 South Wadsworth
Littleton, Colorado 80128-6901



**Subject: North I-25 Front Range EIS
Cooperating Agency and NEPA Merger Agreement**

Dear Mr. Carey:

The Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA), in cooperation with the Colorado Department of Transportation (CDOT) Region 4, are initiating an Environmental Impact Statement (EIS) addressing highway and transit improvements generally along the I-25 corridor from Denver to north of Fort Collins. The transportation improvements will most likely require a Section 404 permit and because of your agency's legal jurisdiction over these permits we are requesting that you be a cooperating agency for this EIS.

In addition, we would like to request your involvement in merging the National Environmental Policy Act (NEPA) process and the 404 permitting process for this project. We think this is warranted because of the extent of drainages and water resources that dissect this project area.

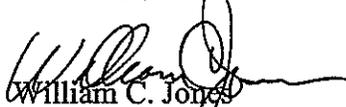
Your agency's involvement should entail those areas under its jurisdiction and no direct writing or analysis will be necessary for the document's preparation. The following are activities we will take to maximize interagency cooperation:

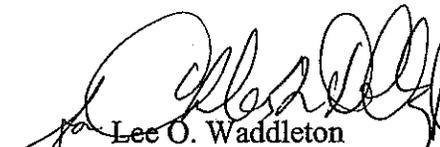
1. Invite you to coordination meetings.
2. Consult with you on any relevant technical studies that will be required for the project.
3. Organize joint field reviews with you.
4. Provide you with project information, including study results.
5. Notify you of joint public involvement and public hearing process.
6. Encourage your agency to use the above documents to express your views on subjects within your jurisdiction or expertise
7. Include information in the project environmental documents that cooperating agencies need to carry out their NEPA responsibilities and any other requirements regarding jurisdictional approvals.

You have the right to expect that the EIS will enable you to carry out your jurisdictional responsibilities. Likewise you have the obligation to tell us if, at any point in the process, your needs are not being met. We expect that at the end of the process the EIS will satisfy your NEPA and Clean Water Act requirements including those related to project alternatives, environmental consequences and mitigation. We expect the permit application to proceed concurrently with the EIS approval process. Further, we intend to utilize the EIS and our subsequent decision making documents (ROD) as the basis for your issuing a Clean Water Act permit.

We look forward to your response to this request and your role as a cooperating agency on this project. If you have any questions or would like to discuss in more detail the project or our agencies respective roles and responsibilities during the preparation of this EIS, please contact Jean Wallace (FHWA) at (303) 969-6730 extension 382 or John Dow (FTA) at (303) 844-4266.

Sincerely yours,


William C. Jones
Division Administrator


Lee O. Waddleton
Regional Administrator

cc: Mr. Bob Garcia, CDOT
Mr. Dave Martinez, CDOT
Ms. Carol Parr, CDOT
Mr. Stanley Elmquist, CDOT
Mr. Tom Anzia, FHU ✓
Ms. Gina McAfee, Carter and Burgess
Mr. John Dow, FTA
Ms. Jean Wallace, FHWA
File



DEPARTMENT OF THE ARMY
CORPS OF ENGINEERS, OMAHA DISTRICT
DENVER REGULATORY OFFICE, 9307 SOUTH WADSWORTH BLVD
LITTLETON, CO 80128-6901

March 5, 2004

Mr. William C. Jones
Division Administrator
U.S. Department of Transportation
Federal Highway Administration
Colorado Federal Aid Division
555 Zang Street, Room 250
Lakewood, Colorado 80228-1040

Mr. Lee O. Waddleton
Regional Administrator
Federal Transit Administration
Region 8
216 Sixteenth Street, Suite 650
Denver, Colorado 80202-5120

**RE: Permit Application number 200480110
I-25 North Corridor EIS; Adams, Weld, and Larimer Counties, Colorado**

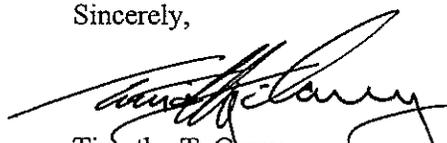
Dear Mr. Jones and Mr. Waddleton:

I am writing this letter in response to your correspondence dated February 5, 2004, received in this office on March 4, 2004, regarding the above referenced project. In your letter you requested that the U.S. Army Corps of Engineers (COE) participate as a Cooperating Agency during preparation of the subject EIS. Please note that this project has been assigned permit application number 200480110 and should be referenced as such in all future correspondence.

The COE accepts your invitation to participate as a Cooperating Agency. Our involvement will include providing document review and input concerning potential impacts to waters of the United States subject to COE jurisdiction under Section 404 of the Clean Water Act. In addition, we will work with your agency and the Colorado Department of Transportation to merge the NEPA/Section 404 process as much as possible. This effort will include providing assistance in developing the Purpose and Need statement, as well as evaluating and assessing alternatives relative to the Section 404(b)(1) Guidelines. As requested in my letter dated February 6, 2004, to Mr. David Martinez of the Colorado Department of Transportation, the first step in the NEPA/Section 404 merger process will be our review of a draft Purpose and Need statement.

Ms. Margaret Langworthy will serve as the primary point of contact. If you need to reach either of us by telephone, our number is 303-979-4120. Our e-mail addresses are timothy.t.carey@usace.army.mil and margaret.k.langworthy@usace.army.mil.

Sincerely,


Timothy T. Carey
Chief, Denver Regulatory Office

CF:
Kathryn Schenk, CENWQ-OD-R



MEETING MINUTES

CORPS OF ENGINEERS COORDINATION MEETING (REVISED)

MEETING DATE: April 21, 2004

LOCATION: Corps of Engineers

ATTENDEES: **FHWA:** Mike Vanderhoof, Jean Wallace
Corps: Margaret Langworthy
CDOT: Carol Parr, Dave Martinez, Pete Graham
FTA: John Dow
C&B: Gina McAfee
EPA: Sarah Fowler

PREPARER: **Carter Burgess**
Gina McAfee

COPIES: Attendees, Chris Primus, Laura Backus, Wendy Wallach,
Kim Gambrell, Rebecca Pierce, Zafar Alikhan, Tim Carey, Beth Chase,
Holly Miller, Becky Noe, C&B File #071609.400

MEETING SUMMARY

1. The Corps number for this project is 2004-80110.
 2. Gina gave a brief update to the project and a summary of scoping impact. Margaret asked why traffic volumes have increased. This is likely due to increases in population and employment in the study area. The NFR household survey found that I-25 is used for local trips but also that not much traffic goes all the way from Fort Collins to Denver. Trips are often dispersed.
 3. Gina gave a summary of agency scoping input. The functional evaluation of wetlands is being developed by Scott Franklin. Something in between the Florida procedure and a Summit County procedure is likely. They would like to capture some of the biological functions. When we get ready to do our wetland delineation, we should check with Scott Franklin, to see if we need to include functional evaluations in our delineations.
 4. In the permitting process, we should show both jurisdictional and non-jurisdictional wetlands. The Corps will be evaluating indirect impacts to all wetlands and will want to review mitigation for all wetlands. Per Executive Order requirements, mitigation for all wetlands will be provided. All permit applications should now show both jurisdictional and non-jurisdictional wetlands.
-

MEETING MINUTES

*Corps of Engineers Coordination Meeting
April 21, 2004
2 of 2*

5. Tom described the initial statement of purpose and need, including data to support the needs. Tim Carey wanted us to be aware of the recent CDOT guidance. When we develop an alternative, we need to evaluate whether or not that alternative meets purpose and need. We need to quantify the needs and the goals to respond to these needs.

Will we be improving the existing condition?

Gina said that we may be able to measure some of these, but some we may not.

6. Margaret feels that the evaluation criteria we are showing demonstrate a very logical approach.
7. Margaret thinks the overall approach sounds good—we seem to be out in front.
8. There will be a meeting this afternoon to clarify expectations from the Corps. An attorney will be coming (Skip Spensley).
9. The 404(b)(1) guidelines from EPA provide a better description of practicability.
10. In June we plan to have a revision of our purpose and need, with data to support the needs and (for some of the needs) possible measurements of the needs.
11. Should AASHTO standards be referenced in our purpose and need? Saying “in accordance with appropriate standards...”
12. Alternatives will be dropped out for reasons other than whether or not an alternative responds to purpose and need.
13. Gina described the phased data collection plan.
14. In June we should send the revised purpose and need to Margaret. We will meet to discuss the results of initial and conceptual alternatives screening at one time. We need to involve Sarah Fowler at all of these points as well.
15. The No-Action Alternative can suffice as the alternative that avoids impact to wetlands and Waters of the U.S. Another option is the Congestion Management Alternative.
16. Sarah reminded us of the St. George Smart Growth analysis. We may want to add some of this to our Congestion Management Alternative.



MEETING MINUTES

Corps of Engineers Coordination

MEETING DATE: June 14, 2004

LOCATION: Corps of Engineers Offices

ATTENDEES: **CDOT:** Stan Elmquist
FHWA: Mike Vanderhoof
Corps of Engineers: Margaret Langworthy
C&B: Gina McAfee, Laura Backus
FHU: Tom Anzia
EPA: Sarah Fowler

PREPARER: ~~Carter Burgess~~
Gina McAfee

COPIES: Attendees, Tim Carey, Carol Parr, Jean Wallace, Holly Miller, John Dow, Becky Noe, C&B File #071609.400

MEETING SUMMARY

1. Gina and Tom provided an update to project activities. We invited Sarah Fowler to the EPA meeting.
2. Margaret likes our criteria and process for Level I screening. This demonstrates that we used the Corps criteria and it is visual.
3. Regarding the evaluation criteria, we might want to look at people movement not just vehicle movement.
4. Tom described the comments received on purpose and need relative to the ordering of the needs.
5. The measure of improving accessibility...is confusing. Should this be "Improve accessibility of?" Could it be "Improve transportation access options?"
6. The need which is stated as continued growth pressure really consists of two issues:
 - ▶ Land use and development is proceeding at a very high rate.
 - ▶ The encroaching development restricts future transportation uses.
7. There is real interest in this corridor in rail transit.
8. Why are there more accidents in certain segments? There are a couple of super elevation problems; the speed is an issue, the vehicle mix is an issue.

MEETING MINUTES

*Corps of Engineers Coordination Meeting
June 14, 2004
2 of 2*

9. The service life of infrastructure can be increased by replacement or maintenance.
10. We may be failing all heavy rail alternatives.
11. Are we considering a guided bus type technology? I-70 West is seriously considering this, so it can go off system as needed, rather than requiring a transfer.
12. Margaret thinks the Level II evaluation criteria are okay—certainly wetlands, endangered species and historic properties would make sense and the final three are community or agency concerns.
13. For “smart growth” we should make sure we disclose the benefits of this in the EIS.
14. Tim will be likely be looking for a threshold. It is too early for this corridor.
15. We will meet again:
 - When we have some data collected.
 - When we have some preliminary screening results (from Level II).

MEETING MINUTES

Discuss Issues with the Corps of Engineers

MEETING DATE: December 8, 2004

LOCATION: Corps of Engineers

ATTENDEES:
EPA: Sarah Fowler
COE: Margaret Langworthy
FHWA: Jean Wallace, Mike Vanderhoof
CDOT: Dave Martinez, Pete Graham
FHU: Tom Anzia, Gregg Mugele
Carter and Burgess: Gina McAfee

PREPARER: **Carter+Burgess**
Gina McAfee

COPIES: Attendees, Wendy Wallach, Holly Miller, Carol Parr, Dave Beckhouse, Alison Deans-Michael, Julie Morrison, Craig Gaskill, Bob Garcia, Stanley Elmquist, Pete Graham, Dave Martinez, Becky Noe, C&B File #071609.400

MEETING SUMMARY

1. One comment on purpose and need is that the terminology of generally "decreasing congestion" is preferred over increasing capacity. For purpose and need, Margaret thinks we need thresholds. Mike indicated that the merger agreement commits to quantifications where possible. The screening criteria are really thresholds.
2. Gina, Jean and Tom described the Level 2 alternatives. Margaret asked for clarification about HOT lanes. Sarah asked if limited access lanes could be HOV—or could they have a different speed limit? For additional lanes (alternative C)—this should be a six to eight lanes total. Margaret is concerned that the new arterial roads will stimulate growth and will have a greater impact on the environment.
3. Mike asked for a clarification of where we are in the process. We have completed Level 1 screening and still need to get official concurrence on purpose and need.

We will be adding more data to purpose and need, like travel patterns, most recent travel projections, origin and destinations, etc.

The merger agreement says that we cannot use purpose and need to screen alternatives until the Corps concurs with our purpose and need. The merger agreement also says that



MEETING MINUTES

Discuss Issues with the Corps of Engineers

December 8, 2004

2 of 2

we request concurrence from the Corps on an actual draft Purpose and Need chapter. Margaret is expecting more detail like we have a safety problem because there is a curve in this location.

Mike indicated the merger agreement requires concurrence on purpose and need, alternatives, preferred alternative and mitigation. Before getting Corps concurrence on purpose and need, we can screen alternatives based on practicability and environmental factors.

We should continue to develop purpose and need to add details like travel patterns.

Margaret is confused about the aging infrastructure component. This would be addressed regardless of which alternative is selected, but should also be an evaluation criteria.

4. At the end of January, we should plan to ask for concurrence on purpose and need (more detailed than this one) and 2A and 2B screening—all in the same meeting.

FHWA does not like to use absolute thresholds because there is a desire to let the process flow and not to restrict alternatives.

5. On I-70, there were aerial photos that had different scales, so it appeared that there was less impact. We should avoid this.

To portray the LEDPA, we need to make sure we have gone through the process of minimizing wetland impacts.



MEETING MINUTES

Briefing with the Corps of Engineers

MEETING DATE: March 2, 2005

LOCATION: Corps of Engineers

ATTENDEES:

- Corps: Margaret Langworthy
- FHWA: Monica Pavlik, Ron Sperial, Mike Vanderhoof, Bill Haas, Jean Wallace,
- CDOT: Dave Martinez, Brad Beckham, Carol Parr,
Renee Galeano-Popp
- FHU: Tom Anzia, Holly Miller, Gregg Mugele
- C&B: Gina McAfee

PREPARER: **Carter Burgess**
Gina McAfee

COPIES: Attendees, Craig Gaskill, Julie Morrison, Sarah Fowler, Alison Michaels, Bob Garcia,
Stanley Elmquist, Becky Noe,
C&B File #071609.400

MEETING SUMMARY

1. Gina went over the agenda, which is to discuss two items: Purpose and Need and the Corps' version of the evaluation criteria for Levels 1 and 2A. After this meeting, we will make a formal request of the Corps to formally approve our Purpose and Need statement. Then at our next meeting, we will plan to present the results of Levels 2A and 2B screening and will request informal concurrence on that.
 2. Holly described the changes in this Purpose and Need statement from the previous one: changes in terminology, charts added.
 - Can we use the journey to work data to screen alternatives?
 - Do we need to define when the criteria are required for both highway and transit? We will need to make it clear which criteria are absolutes and which are not.
 - Can we use an absolute for measuring level of safety service? Any places that fall above the line would be studied with the intent to reduce the rate at that location.
 - Is the project purpose consistent with the project purpose required by the Corps?
-

MEETING MINUTES

Briefing with the Corps of Engineers

March 2, 2005

2 of 2

- Margaret is still looking for thresholds to be used for the criteria. The merger agreement says that we should use measurable criteria where we can. Mike thinks that if it is something we can measure, such as reducing the number of locations of accidents—that should be OK. Or we could set a threshold but it may be relatively low. Ron thinks you can't have a measurable threshold for safety. Holly mentioned that we could provide different limits along I-25 that have been improved to design standards.
 - Aging infrastructure is okay to leave in purpose and need.
3. For the criteria chart, we have used the Corps' format.
- For the bridges, we should add that we will replace bridges that were structurally or functionally obsolete.
4. Margaret will send us comments on these criteria, and the Purpose and Need in about a week. We will send her prior to the next meeting the criteria for 2B.

MEETING MINUTES

Briefing Related to Section 404 Merger

MEETING DATE: May 11, 2005

LOCATION: US Army Corps of Engineers

ATTENDEES: **USACE:** Tim Carey, Margaret Langworthy
EPA: Sarah Fowler
USFWS: Alison Dean-Michaels
FHWA: Ron Speral, Mike Vanderhoof, Jean Wallace
CDOT: Carol Parr, Brad Beckham
FHU: Tom Anzia, Holly Miller
C&B: Gina McAfee

PREPARER: ~~Carter~~ **Burgess**
Gina McAfee

COPIES: Attendees, Dave Martinez, Bob Garcia, Robert Edgar, Julie Morrison, Gregg Mugele, C&B File #071609.400

MEETING SUMMARY

1. Gina went over the agenda:
 - Final comments and concurrence on purpose and need.
 - Discussion of Level 2 screening.
2. We will take final comments today and send out a final draft to the Corps, Sarah Fowler, Deb Lebow, Sharleen Bakeman, Brad Beckman, FHWA, and Region 4.
3. Holly described the main changes that have been made since Tim Carey's comments which had been received a month or so ago.
4. Tim had one over arching comment which is related to transit. The statement on page 7 that is: "There is a need to develop a coordinated, overall long-term strategy for ROW preservation..." is very all conclusive and broad. Does this mean that at the end of the process we cannot recommend an alternative that just solves a specific transportation need unless it also provides for future ROW preservation?

Brad described the phased ROD assumption, which is identifying a phase 1 which has AQ conformity and independent utility.

MEETING MINUTES

Briefing Related to Section 404 Merger
May 11, 2005
2 of 3

Tim requested that we add the year 2030 to the first sentence under "Highway and Transit Mobility and Accessibility".

At the top of page 4, we have a purpose statement that only relates to 2030. The committees on the project are interested in looking beyond 2030. CDOT and FHWA need to decide if the sentence about "long-term strategy for ROW preservation" should be expressed for the year 2030 or beyond 2030. And we need to decide if that is such a compelling need that we could not recommend a strategy that only addressed the need for 2030.

Ron Sperial feels strongly that this document needs to stop at 2030. This should not be a Tier 1 EIS.

5. Tim's main comment was to request another clarification on page 7 about transportation demand. That is related to "capacity and efficiency".
6. Tim provided verbal concurrence with purpose and need. We will clarify the 2030 vs. beyond 2030 and send this out again with a letter requesting written concurrence.
7. We passed out the complete package of criteria, measures, and thresholds. The Corps has seen most of this previously, although the Level 2A and 2B criteria and measures have been finalized.

Tim asked Mike about the 1978 DOT order that states that transportation alternatives will be evaluated based on practicability (rather than reasonableness).

As long as we are screening on reasonableness but the screening is also related to practicability, that would make the most sense. For environmental resources, the Corps will want us to treat resources like listed species and AQ in a manner that gives them more say in the alternatives screening.

June 23 is a tentative date for a NEPA/404 workshop.

Economic growth demands needs to be removed from 2A – safety also needs to be removed from the transit category.

For effects to the built environment and social environment, as we move through the evaluation process, we will have more data so we can more clearly say whether a certain impact could be considered not practicable.

The Corps would likely have a problem with eliminating an alternative for "built environment" impacts – especially if that alternative had wetland impacts. EJ should not have the same "standing" as 4(f) since it is an Executive Order and not a law.

Please get additional comments on this criteria back to us after this meeting.

MEETING MINUTES

Briefing Related to Section 404 Merger
May 11, 2005
3 of 3

8. Holly described the 2A screening results.

Margaret questioned how much of an impact on I-25 traffic would an arterial road have? We modeled US 85 and if you improved it, it would take 5 to 10% if traffic off of I-25.

For the CM Alternative, we need to document the most generous assumption for each of the elements and show if it can stand as a stand-alone alternative.

Sarah asked for clarification about transit operators. We will be developing a future plan for transit operations.

What about guided bus (like on I-70 West)? We need to make sure we allow this as a derivative of BRT.

9. The Corps needs to be provided with a table for 2A and 2B – that shows clearly why different alternatives were dropped out.
10. Holly described the roadway analysis results for 2B. The only alternatives that were eliminated were the shorter distance alternatives.

We need to provide Tim with the very specific data for wetlands, endangered species, and water quality (Waters of the US).

If we are screening based on social, we need to make sure we have quantifiable information.

11. Gina described the transit 2B results.

Commuter Rail F may drop out because of impacts to rare or T/E species. Commuter Rail A may also drop out because of environmental reasons, but not if the most substantial impacts occur on the FasTracks corridor.

12. Once the southern terminus issue is resolved, we will need to send out:

- Revised (and final) purpose and need.
- Level 2 screening table.
- Quantitative data for aquatic resources.

13. If Tim sees a problem with any of this, he will let us know.



U.S. Department
of Transportation

**Federal Highway
Administration**

FILE - EIS - AGENCY
COE - PURPOSE & NEED

12300 W. Dakota Ave., Ste. 180
Lakewood, CO 80228

July 19, 2005

Colorado Federal Aid Division

Mr. Tim Carey, Chief
Denver Regulatory Office, Omaha District
U.S. Army Corps of Engineers
9307 South Wadsworth
Littleton, CO 80128-6901

Dear Mr. Carey:

Enclosed please find a current copy of the Purpose and Need Statement for the North I-25 EIS. This most recent version includes some minor changes to the "Purpose" statement and to the "Mobility and Accessibility" Need statement to address concerns raised by our office on the planning horizon as well as to reflect our discussions at our last meeting on May 11, 2005. At this time, we are requesting written concurrence from you that this Purpose and Need statement is acceptable under the NEPA/404 merger agreement.

Please contact Jean Wallace at (720) 963-3015 if you have any questions regarding the Purpose and Need Statement or this request. We look forward to receiving your written response.

Sincerely,


for David Nicol, P.E.
Division Administrator

Enclosure

cc (w/enclosure):

Margaret Langworthy, USACE

Dave Martinez, CDOT Region 4

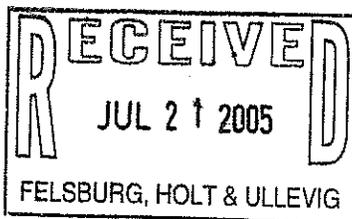
Carol Parr, CDOT Region 4

✓ Tom Anzia, Felsburg, Holt and Ullevig

Gina McAfee, Carter & Burgess

Ron Sperial, FHWA

Mike Vanderhoof, FHWA





DEPARTMENT OF THE ARMY
CORPS OF ENGINEERS, OMAHA DISTRICT
DENVER REGULATORY OFFICE, 9307 SOUTH WADSWORTH BLVD.
LITTLETON, COLORADO 80128-6901

July 25, 2005

Mr. David Nicol
Division Administrator
Federal Highway Administration
Colorado Federal Aid Division
12300 W. Dakota Avenue, Suite 180
Lakewood, Colorado 80228

RE: North I-25 Front Range EIS

Dear Mr. Nicol:

I'm writing this letter in response to your correspondence of July 19, 2005. In your letter, you requested that the Corps of Engineers (Corps) provide concurrence on the Purpose and Need Statement for the above referenced EIS. In response to your request, and in accordance with our NEPA/404 Merger Agreement, the Corps concurs with the Purpose and Need Statement.

Please extend my thanks to Ms. Jean Wallace and the project team for taking my earlier comments into consideration and revising the original draft Purpose and Need Statement. I believe the current statement more accurately reflects the purpose and need for the project. If you have any questions, please call me at 303-979-4120.

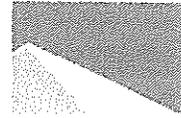
Sincerely,

A handwritten signature in black ink, appearing to read "Timothy T. Carey", is written over a circular stamp or seal.

Timothy T. Carey
Chief, Denver Regulatory Office

ACE/COE
#2111

NORTH I-25
EIS



information. cooperation transportation.

MEETING MINUTES

Section 404 Merger Update

MEETING DATE: May 15, 2006

LOCATION: Corps of Engineers

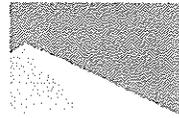
ATTENDEES: **CDOT:** Dave Martinez, Carol Parr, Brad Beckham, Sharleen Bakeman
USACE: Margaret Langworthy
EPA: Sarah Fowler
USFWS: Alison Michael
FHWA: Mike Vanderhoof, Jean Wallace
FHU: Holly Buck
C&B: Gina McAfee

PREPARER: ~~Carter~~ **Burgess**
Gina McAfee

COPIES: Attendees, Bob Garcia, Stan Elmquist, Steve Olson, Dave Beckhouse, Robert Edgar, Tom Anzia, Gayl Harrison, Chris Primus, Wendy Wallach, C&B File #071609.400

MEETING SUMMARY

1. Gina gave a very brief update on the project.
 2. Brad described the derivation of the work "pot"—the seventh pot covers projects that are outside of committed projects for Regions 1 through 6.
 3. Holly described the new "No Action" alternative—these are generally maintenance or safety issues. These could have wetland or other natural resource impacts.
 4. Margaret asked about our rationale for combining highway and transit components into each of the packages. Holly described the primary reasoning, which was to first address the primary I-25 purpose and need of addressing congestion—widen the highway plus managed lanes.
 5. Sarah wanted to know which of the two transit alternatives would be most energy efficient.
 6. Tim Cary asked about a transit implementer—should this be a screening criterion for practicability? This will be a screening criterion, but not at this level.
-



MEETING MINUTES

*Section 404 Merger Update
May 15, 2006
2 of 2*

7. Brad asked about the physical impact difference between toll and HOT. The two had slightly different alignments. Both were assumed to be express tolled. At Level 3, we assumed two managed lanes in each location.
8. For travel time comparison between highway and transit, there is a discrepancy between our criteria and the transit travel time. We will add this to the transit travel time column.
Action: Holly
9. There seems to be a discrepancy in the highway chart between the hours of congestion and the miles of congestion.
Action: Holly will check with Chris Primus.
10. The reason there is such a large capital cost difference between six lanes and toll is that the tolled lanes would be longer because of the seventh pot committed project.
11. BRT looks pretty good from a purpose and need, practicability, and environmental standpoint.
12. Sarah would like to see a robust discussion of indirect impacts in the DEIS. What will be the trade-offs between the two packages in terms of land use patterns?
13. FHWA will send an alternatives sign-off request to the Corps.
Action: Jean Wallace/Mike Vanderhoof.
14. Mike questioned whether or not we could mix and match along I-25.
15. We should combine the purpose and need, practicability and environmental matrices. We need to make sure that we never eliminate the LEDPA.
Action: Wendy Wallach
16. We will send out revised charts.
Action: Holly
17. We will set up avoidance and minimization meetings to look at "hot spots."
Action: Gina



U.S. Department
of Transportation

Federal Transit Administration
Region VIII
12300 West Dakota Avenue, Suite 310
Lakewood, CO 80228-2583
Telephone: 720-963-3300

Federal Highway Administration
Colorado Division
12300 W. Dakota Ave., Suite 180
Lakewood, CO 80228
Telephone: 720-963-3000

AUG 4 2006

Mr. Tim Carey
U.S. Army Corps of Engineers
Denver Regulatory Office
Omaha District
9307 S. Wadsworth Blvd.
Littleton, CO 80128-6901

Dear Mr. Carey:

Subject: North I-25 Merger Concurrence Point

Pursuant to the National Environmental Policy Act/Clear Water Action Section 404 merger process for transportation projects in Colorado, we are requesting concurrence from the Corps of Engineers regarding the alternatives that we have identified for detailed analysis in the draft EIS. These were presented to your staff in a meeting on May 15, 2006, with subsequent clarification provided to you by e-mail on June 23, July 13, and July 24, 2006.

These packages are:

- DEIS Alternative A: General purpose lanes I-25 plus commuter rail along BN Corridor plus commuter bus on US 285; and
- DEIS Alternative B: Express lanes plus bus rapid transit (on I-25).

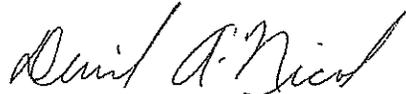
As we learn more about how the different elements of the packages work together to meet the project purpose and need, our intention is to be able to have the flexibility to combine the elements to optimize the alternatives. We do not expect to add elements that are not identified in either of these two packages.

Enclosed for easy reference is a description of how these packages were formed and maps of them.

If you have any further questions, please contact Monica Pavlik at (720) 963-3012.

Sincerely yours,


Lee Waddleton
Regional Administrator
Federal Transit Administration


David A. Nicol, P.E.
Division Administrator
Federal Highway Administration

cc: Sarah Fowler, EPA
Alison Michael, USFWS
Carol Parr/Dave Martinez, CDOT Region 4
Brad Beckham, CDOT EPB
Gina McAfee, Carter-Burgess
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DEPARTMENT OF THE ARMY
CORPS OF ENGINEERS, OMAHA DISTRICT
DENVER REGULATORY OFFICE, 9307 SOUTH WADSWORTH BLVD.
LITTLETON, COLORADO 80128-6901

August 9, 2006

Mr. David Nicol
Division Administrator
Federal Highway Administration
Colorado Division
12300 West Dakota Avenue, Suite 180
Lakewood, Colorado 80228

Mr. Lee Waddleton
Regional Administrator
Federal Transit Administration
Region VIII
12300 West Dakota Avenue, Suite 310
Lakewood, Colorado 80228

RE: North I-25 EIS

Dear Messrs. Nicol and Waddleton:

I'm writing this letter in response to your correspondence of August 4, 2006. In your letter, you requested that the Corps of Engineers (Corps) provide concurrence on alternatives to be evaluated in detail in the Draft EIS for the above-referenced project. In response to your request, and in accordance with our NEPA/404 Merger Agreement, the Corps concurs with the alternatives to be evaluated, as the least environmentally damaging practicable alternative has not been eliminated.

Please extend my thanks to Ms. Monica Pavlik and the project team for taking my earlier comments into consideration and revising the alternatives. If you have any questions, please call me at 303-979-4120.

Sincerely,

A handwritten signature in black ink, appearing to read "Timothy T. Carey", is written over a circular stamp or seal.

Timothy T. Carey
Chief, Denver Regulatory Office

CF:

Sarah Fowler, EPA
Alison Michael, USFWS
Martha Chieply, CENWO-OD-R



DEPARTMENT OF THE ARMY
CORPS OF ENGINEERS, OMAHA DISTRICT
DENVER REGULATORY OFFICE, 9307 SOUTH WADSWORTH BOULEVARD
LITTLETON, COLORADO 80128-6901

July 29, 2008

Ms. Carol Parr
Colorado Department of Transportation
Planning/Environmental Section
1420 2nd Street
Greeley, CO 80631

**RE: North I-25 Environmental Impact Statement
Wetland Delineations along the I-25 Highway Corridor
Corps File No. 200480110**

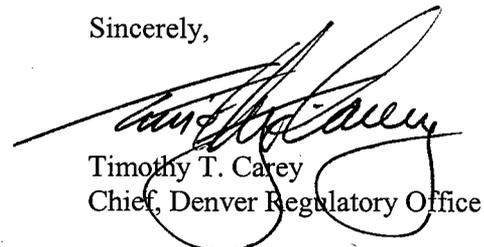
Dear Ms. Parr:

Mr. Terry McKee of my office has reviewed the July 28, 2008 wetland delineation report for this project. The wetland report and wetland mapping for this project is considered accurate and accepted by my office. This delineation verification is valid for 5 years from the date of this letter, unless there has been a change in hydrology.

If any work associated with this project requires the placement of dredged or fill material, and any excavation associated with a dredged or fill project, either temporary or permanent, in the aquatic sites identified in your delineation report, this office should be notified by a proponent of the project for Department of the Army permits, changes in permit requirements and jurisdictional determinations pursuant to Section 404 of the Clean Water Act. Work in an aquatic site should be shown on a map identifying the Quarter Section, Township, Range and County and Latitude and Longitude, Decimal Degrees (datum NAD 83) of the work and the dimensions of work in each area. Any loss of an aquatic site may require mitigation. Mitigation requirements will be determined during the Department of the Army permitting review.

If there are any questions regarding wetland determinations call **Mr. Terry McKee** at (303) 979-4120 and **reference Corps No. 200480110**. If there is any question regarding permitting and jurisdictional determinations call **Ms. Margaret Langworthy** at this office.

Sincerely,



Timothy T. Carey
Chief, Denver Regulatory Office

tm

State of Colorado

DEPARTMENT OF TRANSPORTATION
Region 4 - Loveland Residency
2207 E. Highway 402
Loveland, CO 80537-8885



January 21, 2004

Deborah Lebow
Environmental Protection Agency
NEPA—EcoSystem Protection
Mail Stop 8EPR-EP
999 18th Street
Denver, CO 80202

**Re: North I-25 Front Range EIS
Invitation to a Resource Agency Meeting**

Dear Ms. Lebow:

The Colorado Department of Transportation has issued the Notice to Proceed with the North I-25 Front Range Environmental Impact Statement (EIS) process in CDOT Region Four and the Notice of Intent was published in the Federal Register on December 31, 2003. The goal of this project is to prepare an EIS evaluating future transportation alternatives and improvements for the I-25 corridor between Denver and Fort Collins.

Alternatives under consideration include:

1. Taking no action.
2. Improvements to the existing highway network, particularly I-25 but perhaps also US 85 and US 287.
3. Transit options including bus and rail technologies.
4. Constructing a highway at a new location.

We would like to invite you or your designated representative to participate in the scoping meeting for the Resource Agency Team. This meeting will be:

**Thursday, February 26, 2004
2:00 p.m. to 4:00 p.m.
Loveland CDOT Office
2207 E. Highway 402
Loveland, CO 80537**

At this meeting we will provide a summary of our process and would request your input on any particular issues you wish us to study or processes you wish us to follow.

We look forward to working in a partnership with you to conduct this EIS and determine the best transportation options for Northern Colorado.

Sincerely,



David M. Martinez
Project Manager
CDOT N. I-25 Front Range EIS

cc: Project File



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8

999 18TH STREET - SUITE 300

DENVER, CO 80202-2466

Phone 800-227-8917

<http://www.epa.gov/region08>

MAY 17 2004

Ref: 8EPR-N

Leo O. Waddleton
Federal Transit Administration
216 16th Street, Suite 650
Denver, CO 80202

William Jones
Federal Highway Administration
Division Administrator, Colorado Division
555 Zang Street, suite 250
Lakewood, Colorado 80228

Re: Scoping Comments on North I-25 Corridor
Environmental Impact Statement

Dear Messrs. Waddleton and Jones:

This letter is in response to the Federal Highway Administration (FHWA) and Colorado Department of Transportation's (CDOT) request for scoping comments regarding the Environmental Impact Statement (EIS) for the North I-25 Front Range project. The project area extends along I-25 from I-70 in Denver to CO Hwy 14 north of Ft. Collins. The corridor is bordered by US-85 on the east and US 287 on the west. This area covers major portions of Denver, Boulder, Broomfield, Adams, Larimer, and Weld Counties. EPA is pleased to see an EIS that will analyze the overall transportation needs of an entire corridor.

Enclosed are EPA's detailed scoping comments. These comments are intended to help ensure a comprehensive assessment of the project's environmental impacts, adequate public disclosure, and sufficient alternatives to support the decision-making process. We understand that you are well versed in the NEPA process but offer a complete letter to provide our input early in the process. We sincerely hope that our scoping comments will be beneficial to you and to the project, and that they will help streamline the process.

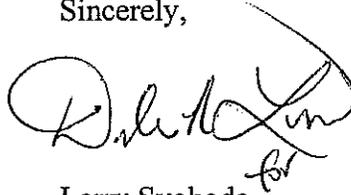
Our major concerns with the North I-25 Front Range transportation project are the indirect and cumulative environmental impacts of the growth along the Front Range as well as future air quality impacts in the region. We voiced these concerns at the scoping meeting held in Loveland on 2/26/04. Based on discussions at the scoping meeting, we understand that you



intend to address these issues within each of the EIS alternatives. We look forward to working with you on the development of a strategy for a comprehensive impacts analysis. If you have questions about these comments, please feel free to call me at (303) 312-6004 or Robert Edgar of my staff at (303) 312-6669.

Thank you in advance for consideration of these comments. We look forward to a continued cooperative working relationship with your agencies.

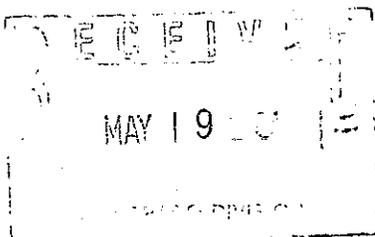
Sincerely,

A handwritten signature in cursive script, appearing to read "Larry Svoboda", with a small "for" written below it.

Larry Svoboda
Director, NEPA Program
Office of Ecosystems Protection and Remediation

Enclosures (2)

cc: Jean Wallace, Program Manager, FHWA
David Martinez, CDOT Region 4



EPA SCOPING COMMENTS
I-25 North Front Range EIS

Alternatives

EPA recommends that this EIS investigate alternatives that incorporate the following options:

1. Intelligent transportation system improvements on I-25, US 287 and US 85;
2. Travel Demand Management (eg., tolls)
3. Expanded Inter-Regional Bus Service;
4. Combined General Purpose - High Occupancy Vehicle (HOV)/Bus Lanes; and
5. Passenger Rail Service with development along existing rail lines.

For each alternative, please include the morning (am) and afternoon (pm) peak travel times at the build-out year between Denver and other cities such as Boulder, Longmont, Loveland, Fort Collins and Greeley. Show a comparison between today's travel times and the projected travel times at the build-out year.

The EIS should also address the impacts of interchanges and transit stations. Often, different locations will have significantly different impacts, particularly indirect impacts, so we encourage you to have an array of options that are sufficiently different to compare various impacts. The EIS should coordinate with the pilot project to combine NEPA and transportation planning currently underway in the Ft. Collins - Greeley area.

Air Quality Impacts

This project covers several counties including the Denver-Boulder metropolitan area which is currently a maintenance area for carbon monoxide (CO), particulate matter (PM10) and 1-hour ozone. In addition, this metropolitan area along with the counties of Larimer, Adams and Weld may be classified as non-attainment for the 8-hour ozone standard. The analysis of the air quality impacts in the EIS should allow for a comparison of the impacts between the various alternatives. The analysis should also cover likely combinations of alternatives such as minor widening, expanded regional bus service, versus highway widening only. This comparison of air quality impacts along with some reasonable steps to help mitigate significant air quality impacts will assist the public and decision-maker in evaluating the proposed action and the alternatives to the proposed action. The EIS should present the existing environment (current conditions), a no-action alternative (conditions without the proposed action), and future conditions under proposed alternatives as well as cumulative effects for each alternative. Listed below are our suggestions for a complete air quality discussion.

Baseline Analysis of Clean Air Act Criteria Pollutants and Conformity

In the existing environment section, the EIS should establish the baseline air emissions and concentrations of criteria pollutants and the area's current compliance status with national and state air quality regulations. The following information should be considered for inclusion in

the document:

- The pollutants to be evaluated should include CO, nitrogen oxides (NO_x), volatile organic compounds and hydrocarbons, ozone, and PM₁₀.
- Any local and regional air monitoring data. Local hot spot monitoring and ambient monitoring projects implemented by the state or local air agencies would also be sources of short or long-term air quality data.
- Analysis of the Clean Air Act attainment status for CO, PM₁₀, 1-hour ozone, NO_x, sulfur dioxide, and PM 2.5. The recent non-attainment status for 8-hour ozone in this project area should be discussed as well as local actions being planned to reach attainment such as the Early Action Compact.
- Any air dispersion modeling that has already been completed including urban air-shed modeling and hot spot assessments. Include relevant climatological data such as the incidence of hazardous weather that may impact transportation as well as a windrose showing the prevalent wind directions and wind speeds. For modeling results, describe the type of model used and include a summary of the values used for the model input parameters.
- A complete inventory of mobile source emissions in the area of the project as well as a cumulative impacts analysis that accounts for both mobile and stationary sources. Recent mobile source estimates may be found in local and regional transportation plans or in a conformity determination. The estimates should include fugitive or re-entrained road dust.

Hazardous Air Pollutants

Recent studies are showing a variety of health-related effects near high traffic areas. Hazardous Air Pollutants (HAPS) are those pollutants known or suspected to cause cancer or other serious health or environmental effects. Section 112(b)(1) of the Clean Air Act established the list of HAPs. There are currently 188 HAPs. In a rulemaking published on March 29, 2001, EPA identified a subset of 21 mobile source air toxics (MSATs), a subset of the 188 HAPs with the addition of diesel exhaust (PM and organic gases).

EPA recognizes that the methods and procedures for assessing the environmental impact of MSATs may be new to many parties working on transportation projects through the NEPA process. Policies, procedures, and methods for assessing MSATs in NEPA documents are still being developed. Although regulatory standards for MSATs have not been set, there is substantial information on impacts that can be ascertained from emissions and concentrations data.

The level of analysis of MSATs is most appropriately determined on a case-by-case basis,

recognizing that each project has unique characteristics. The impact of a proposed project should be analyzed appropriate to its significance, paying particular attention to providing information that can be of use to the decision-maker and that meets the needs of public disclosure. The analysis should not be expected to be the same in either content or specificity for every project.

For this project, we suggest that a general discussion of MSAT's along with an emissions inventory be included in the EIS. Identify residential areas / schools immediately adjacent to highways, interchanges, rail lines and transit stations, that could be impacted. For purposes of comparison, it will be useful to determine whether future conditions will be worse than today's existing conditions, and how the emission inventories for each alternative compares with the existing conditions.

Analysis of all air pollutant impacts for the alternatives

Mobile source emissions should be estimated using EPA's Mobile 6.2 emissions model and EPA's Compilation of Air Pollutant Emission Factors, also known as AP-42. The emissions and air quality impacts associated with each alternative including the no build scenario should be estimated and should include the following:

- The vehicle miles traveled (VMT) from the best available travel models for the traffic and travel patterns estimated for the future transportation system under all build and no-build scenarios;
- All pollutants mentioned above including MSATs and road dust;
- Analysis, where appropriate, of CO and PM10 using hot spot and ambient modeling methods. PM10 hot spots can be analyzed using several models including CAL3QHC for comparing alternatives;
- Construction impacts for each alternative. Construction impacts include the equipment exhaust and dust created by construction equipment. (See also the Maintenance and Construction Impacts Section, below).

Conformity Analysis

This project is located in a maintenance area for carbon monoxide (CO), PM10, and 1-hour ozone, and the project area is proposed as part of the 8-hour ozone non-attainment area. Adams, Boulder, Broomfield, and Denver counties are part of the Denver metro maintenance areas for the PM10 and 1-hour ozone standards. Demonstrating conformity for CO and 1-hour ozone standards with the SIP is required and may be required for the 8-hour ozone standard if the Denver Early Action Compact is not successful.

- The project must be part of a conforming transportation plan and Transportation Improvement Program (TIP) before an EIS or EA can be finalized. The EIS should assess and discuss whether the project meets this criteria.
- The project concept and scope in the EIS must not be significantly different from the project analyzed in the plan and TIP. This should be discussed in the EIS.
- If the conformity analysis was completed in another document, ensure that the latest planning assumption and models were used.

- For the purpose of conformity, complete CO hot spot analysis is required (See 40 CFR sections 93.116 and 93.123).

Possible mitigation of impacts

We suggest that the EIS include possible methods and techniques that might be employed to mitigate the negative impacts of the project on air quality. A few suggestions follow:

- Implementation of stage I / stage II vapor controls (reducing vehicle refueling emissions).
- Limitations on idling emissions from diesel engines particularly during construction
- Use of soot filters on diesel powered construction equipment
- Use of watering to control fugitive dust emissions during construction activities.

Where possible, estimate the air emissions reduction for various mitigation measures.

- Mitigation of construction impacts should be fully considered. Mitigation methods include dust suppression using emulsion solutions and temporary paved or aggregate road base, diesel oxidation catalysts on engine exhaust, ultra low sulfur diesel fuel, biodiesel, engine idling time-limits, use of modern low emission equipment, time limitations on idling emissions from diesel engines, and the use of soot filters on diesel equipment.
- A list of suggested practices is attached.

Hazardous Waste/Superfund

The analysis should include a list of potentially affected hazardous waste sites, and mitigation measures to ensure avoidance of hydrologic and other disturbances at these sites. If any underground storage tanks are found in the proposed right-of-way, CDPHE should be notified. A contingency plan on finding unidentified petroleum and hazardous substances should be in place prior to disturbing the soil.

Water Quality

As you know, highway construction and completed highway projects can result in increased surface water runoff, stream channel alternation, alteration in hydrology, wetland modification and other water quality-related problems. In rapidly growing areas such as this corridor, the majority of the water quality impacts will be indirect and cumulative.

This project crosses over several streams that are in the South Platte drainage system. Degradation and depletion of the South Platte River are major issues, and we suggest looking at the impacts on a watershed scale and addressing these water quality issues accordingly. The question to be answered is whether this project contributes to those overarching impacts. In addition, the water quality section of this EIS should analyze the following topics:

- Present Colorado designated uses of the affected water bodies and identify if uses are currently impaired. (CDPHE 303(d) list). For example, a segment of the Cache LaPoudre

River has been listed as impaired due to e. coli. The State (CDPHE) has also identified most streams in this corridor for additional monitoring and evaluation. Please refer to Appendix C, pages 7 and 89 of the monitoring and evaluation list in the Status of Water Quality Report in Colorado 2004. Potential water quality problems have been identified for the following streams: Big Thompson River, Little Thompson River, Boulder Creek, Cache LaPoudre, South Platte, and St. Vrain Creek.

Below is a list of what would be included in a very complete water quality analysis. All of this information may not be appropriate for this project:

- Baseline water quality data to provide a comparison between projected conditions and current conditions. This can include baseline data on the following parameters:
 - ▶ temperature,
 - ▶ turbidity (as an indicator of sediment loading),
 - ▶ channel morphological conditions,
 - ▶ the existence of any known point or non-point pollution sources or other problems including nutrients, pesticides and metals, or other toxic substances,
 - ▶ aquatic species and the condition and productivity of that habitat,
 - ▶ the occurrence of aquatic species of concern, e.g., listed threatened and endangered species, state species of concern.

The assessment should reveal what data are available, gaps in the data, and the reliability of that information. Particular attention should be given to fisheries spawning and rearing habitat.

- The extent to which the physical aquatic habitat could be impaired by project activities, including effects on stream structure and channel stability, streambed substrate including seasonal and spawning habits, streambank vegetation and riparian habitats. The analysis should disclose whether the project will cause any reductions in habitat capability or impair designated uses. Other information relevant to the analysis, such as aquatic species habitat and condition and productivity of that habitat should also be included. Particular attention should be directed at evaluating and disclosing aggregate effects of increased levels of sediment, salts and metals.
- A forecast of future conditions for each of the alternatives considered in the document. The forecast should track the baseline data points of concern.
- A description of best management practices (BMPs) to be used to assure that water quality will not be impaired.
- A monitoring program to be used for determining the effects of the project on water quality and the aquatic environment.
- Thresholds for adaptive management, i.e., a description of what will trigger a change in

the BMPs if monitoring data shows that water quality is being impaired by the highway project.

Storm Water Runoff

Storm water discharges associated with highway construction are an industrial activity according to federal storm water regulations (see 40 CFR section 122.6). Highway construction projects must obtain a pollution discharge permit for storm water if construction activities will disturb more than one acre of land. Construction activities may be covered by a general pollution discharge permit rather than an individual permit. If a storm water permit is required, on-site notification must be posted along with a pollution prevention plan.

Normal highway runoff contains contaminants which could affect surface and ground water quality. The EIS should characterize the current quality of streams and ground water resources in the vicinity of the project, as well as the quality of the anticipated highway runoff. Copper, lead and zinc at a minimum should be addressed. Existing water quality impairments or effluent limitations should be considered so that the storm water runoff related to both construction and post-construction does not cause or contribute to a problem with water quality standards. BMPs for collecting and treating storm water during construction and post-construction as required in state and federal pollution discharge permits should be outlined in the EIS. *The EIS should include an estimate of increased storm water flows from impervious surfaces for each alternative and should address the potential effects of these increased flows to adjacent receiving waters.* We suggest using the Driscoll model for these estimates and for the impact the runoff will have on receiving waters. EPA and FHWA are currently working with the Driscoll model to ensure that it is appropriate for these uses in Colorado.

Provisions for hazardous waste containment in case of a spill, and means of collection and treatment of storm water runoff both during and after construction, should also be included.

Although this project falls under a State rather than an EPA permit, EPA requires a sediment basin during construction where one outfall drains ten or more acres. Flow attenuation devices or sediment basins during construction, therefore, are suggested but are not required. Regional stormwater detention facilities may be used as a BMP for reducing sediment loading provided that the proper authority and/or permissions are obtained so those facilities can be maintained in a condition necessary to provide adequate sediment removal efficiency.

Wetlands/Waters of the U.S.

Road construction clearing and earthwork generally includes sedimentation and hydrologic impacts which may cause changes to surface and subsurface drainage patterns and, ultimately, wetland integrity and function. Wetlands are significant environmental resources that have experienced severe cumulative losses nationally. We do not know the extent of wetland impacts from this project. We are nevertheless including this information so that this scoping letter is complete.

The document should describe the following topics:

- Existing wetlands within the analysis area (the analysis area is the landscape or watershed perspective, larger than the project area)
- Wetland acreage, type, ecological function, and how both acreage and function will be protected;
- A thorough analysis of alternatives to avoid and minimize wetland and aquatic resource habitat impacts to assure consistency with the 404(b)(1) Guidelines;
- Indirect impacts on wetlands, in terms of how the direct impacts of the highway will impact the adjacent wetlands and upland hydrology and habitat;
- Indirect impacts to wetlands from induced development (this may be addressed elsewhere in the document, e.g., in the land use section); and
- A clear description of direct, indirect and cumulative adverse impacts to wetlands from all project activities and an explanation of how the direct and indirect impacts, if they cannot be avoided, will be mitigated.

Avoidance of wetland losses is a primary requirement of the Clean Water Act Section 404(b)(1) Guidelines. The U.S. Army Corps of Engineers (Corps) and the EPA through their Mitigation Memorandum of Agreement state that they will “strive to avoid adverse impacts and offset unavoidable adverse impacts to existing aquatic resources, and for wetlands, will strive to achieve a goal of no overall net loss of values and functions.” Avoidance is required before mitigation will be considered. In addition, where applicable, the discussion must address the reputable presumption that there are less damaging upland alternatives.

The section 404(b)(1) guidelines provide the substantive environmental criteria for protecting waters of the U.S. The 404(b)(1) Guidelines, the Corps and EPA 404 staff should be consulted for specific guidance on the scope of avoidance and minimization alternatives that need to be addressed. We recommend coordination with the Corps and other resource agencies *when developing alternatives* to determine whether impacts to wetlands can be eliminated or reduced. The document should include a discussion that informs the public of the potential requirement of a section 404 permit for any discharge of dredged or fill material into Waters of the United States, including wetlands.

We encourage you to conduct the 404 permit process concurrently with the NEPA process, and recommend that a draft 404(b)(1) analysis be prepared for the preferred alternative and appended to the NEPA document. The least damaging practicable alternative should be addressed in the document. This will help ensure that 404 regulatory requirements are properly integrated into the NEPA process as directed by the CEQ regulations (40 CFR 1500). A separate meeting on the wetlands permitting options should be held with EPA and the Corps, FWS and other interested agencies.

Vegetation and Wildlife

The environmental document should include information on the current quality and capacity of the relevant habitat, usage by wildlife near the proposed project, and impacts upon

known wildlife corridors/trails and habitat fragmentation. When evaluating wildlife impacts, include the impacts on birds. Existing wildlife mortality should be disclosed, if known. The document should evaluate the increased mortality from higher traffic levels, habitat removal, reduced access to available habitat and habitat fragmentation, effects on biodiversity, and estimated reductions in impact due to mitigation. We recommend the use of GIS habitat fragmentation map series to visually depict the footprint and zone of influence for each alternative and reasonably-foreseeable build-out scenarios. In addition, information on how invasive species will be handled would be appropriate.

Threatened and Endangered Species

We are not including information in this letter on threatened and endangered species other than to emphasize that the EIS should include the Biological Assessment and the associated U.S. Fish and Wildlife Service (FWS) Biological Opinion or formal concurrence.

Maintenance and Construction Impacts

Maintenance and construction activities can have significant air and water quality impacts. This project area is a maintenance area for some of the criteria pollutants, and has recently violated the new 8-hour ozone standard. If it is not already required in the SIP, we encourage you to estimate the most likely daily emissions associated with each construction phase of the project and review possible mitigation actions. Air quality impacts during construction are potentially significant, and construction periods can last quite a few years. We are enclosing examples of mitigation for air pollution during construction that you can require of your contractors. We suggest that you incorporate whichever of these actions that make sense for this project.

In addition, to minimize water quality impacts, properly staging construction activities so that there is a manageable amount of exposed soils at any given time, is encouraged. If construction activities cannot be staged and/or stormwater runoff cannot be effectively treated to remove sediment during construction, steep slopes and exposed soils should be stabilized to minimize sediment transport to local water bodies and to reduce the risk of localized flooding in roadways. Recommended slope stabilization techniques may include but are not limited to the use of erosion control blankets and soil binding polymers.

Road standards and design have a major effect on scheduled and unscheduled maintenance needs. Scheduled maintenance, such as ditch cleaning and disposal of debris generated from sanding, as well as anticipated but unscheduled maintenance of debris from slumps, should be analyzed and planned for during the design phase of construction and reconstruction projects.

Past practices of sidecasting material over the shoulder, filling depressions and widening shoulders have an adverse effect on wetlands and riparian areas, and should be addressed.

Winter maintenance often results in the introduction of sediment and salt, either directly

or indirectly into streams and associated riparian and wetland resources. These maintenance activities are more a matter of long-term indirect and cumulative effects, and should be analyzed accordingly. Snow plowing subsequent to sanding moves sand and salt off the roadbed to adjacent storm sewers and ditches. It then migrates until deposited in streams or forms a carpet on flat ground. Where winter maintenance may affect wetlands, riparian areas or water quality, the effects should be disclosed in the NEPA document. This discussion should include steps taken to minimize and mitigate unavoidable effects on waters of the U.S.

Environmental Justice

We are including here the questions EPA will ask when reviewing this document's environmental justice analysis. These questions come from *EPA Guidance for Consideration of Environmental Justice in Clean Air Act Section 309 Reviews*, dated July, 1999.

- Were the minority characteristics of potentially affected communities identified?
- Were the relevant economic indicators (e.g., average median income) of the potentially affected populations identified?
- Were potential environmental impacts to minority populations or low-income populations identified?
- What effort was made by the Federal Agency to secure input and participation from potentially impacted minority and/or low income communities?
- Are impacts to the minority populations and low-income populations disproportionately high and adverse compared to the general population or a comparison group; and
- If disproportionately high and adverse impact to minority and low income population is identified, can those impacts be mitigated?

Pollution Prevention

Section 6602 of the Pollution Prevention Act of 1990 established that as a national priority, the following actions should be implemented:

- Pollution should be prevented or reduced at the source whenever feasible;
- Pollution that cannot be prevented should be recycled in an environmentally safe manner whenever feasible;
- Pollution that cannot be prevented or recycled should be treated in an environmentally safe manner whenever feasible;
- Disposal or other release into the environment should be employed as a last resort and should be conducted in an environmentally safe manner.

We raise this issue here in a general manner. Pollution prevention should be evaluated at each level of highway construction, maintenance and operation to reduce waste streams and reduce use of toxic substances.

Pollution prevention is a voluntary program. Through pollution prevention efforts, agencies and private companies have been able to reduce or eliminate groups of pollutants, save money, and reduce regulatory requirements. The EPA Pollution Prevention Program can help

with information on new ideas and technology. Please contact John Brink at (303) 312-6498.

Indirect and Cumulative Impacts of Growth

The indirect impacts from the induced growth that may occur because of transportation improvements, both highway and transit, in this corridor will need to be addressed, as well as the cumulative environmental impacts from potential growth in this area. EPA understands that FHWA, CDOT, and RTD-Denver have proposed using Delphi-Plus as a methodology for assessing indirect induced growth effects for this project.

Transit options in particular may induce growth in and around transit stops. The end of the transit corridor will be of concern for potential environmental impacts, as well as impacts on feeder routes. A comparison of alternatives with reasonably foreseeable growth patterns should be included, and their impacts addressed. Environmental criteria that may be important to consider include the following points:

- Differences in vehicle miles traveled (VMT) translating into air quality improvements;
- Differences in open space translating into habitat preserved;
- Flood plain, wetland and riparian areas preserved or avoided, through sustainable development;
- Amount of impervious surface per alternative, translating into water quality impacts; and
- Infrastructure costs, translating into wastewater and drinking water investments, and economic impacts.

The land use section may be the appropriate place to document the actual environmental impacts of any induced and cumulative growth. In most EIS's, we see a good summary of what will happen to the land use in the area, e.g., how many acres will be converted from farmland to commercial or residential, but we do not see those changes translated into environmental impacts, e.g., acres of wetlands lost or increased stormwater flow due to increased impervious surfaces. We would like to see an impacts analysis performed in the EIS. Land conversion changes the ecosystem through paving, fragmenting and increased human activity, all of which invariably change the natural migration processes and brings non-native plant species to the area. The document should analyze these potential impacts, rather than just reporting acreage potentially disturbed.

We understand that land use decisions are not FHWA, FTA or CDOT's decisions to make. However, if alternatives with land use components that reduce the environmental impacts of the expected growth on air, water, habitat fragmentation, etc, require actions by local responsible entities, those actions should be addressed in the document through agreements, plans, or some process outlining how those actions will be developed

Mitigation

The mitigation proposals in this EIS should have enough detail to allow the reader to determine how the mitigation will be implemented, where it will be implemented, and whether it

will be effective. The attached list of suggested mitigation measures for air quality could help fulfill these requirements.

Mitigation not within the jurisdiction of the lead agency can also be included in the EIS with a discussion of which agency does have jurisdiction and how the mitigation could be implemented. Land use is particularly relevant to mitigation of transportation impacts.

Monitoring

The EIS should include a discussion of and a commitment to monitoring for each resource category determined to be significant. A properly designed monitoring plan will demonstrate how well the preferred alternative resolves the identified issues and concerns by measuring the effectiveness of the mitigation measures in controlling or minimizing adverse effects.

The EIS should include a feedback mechanism which can compare baseline data with monitoring results to ensure that mitigation strategies will improve in the future and that unforeseen adverse effects are identified and minimized. To be effective, the design of the monitoring program should include the following criteria:

- Ensure State objectives and standards are met;
- Provide a mechanism to initiate additional measures if needed to meet State standards and goals;
- Evaluate the effectiveness of the BMPs utilized in the project;
- Evaluate the accuracy of estimates made in the analysis; and
- Provide a feedback mechanism for future projects.

Possible Mitigation Strategies for Air Quality Highway Projects

Construction phase - requirements which can be included in construction contracts

Construction vehicles (source of air toxics):

- Require that construction vehicles meet EPA's most recent standards for new onroad and nonroad diesel engines
- Require Best Available Control Technology (BACT) on all construction vehicle diesel engines (e.g., diesel particulate filters/traps, oxidizing soot filters, catalytic oxidizers, and other feasible control devices that become available to limit or prevent exhaust emissions)
- Require diesel retrofit of construction vehicle engines as appropriate
- Use alternatives in engines and/or diesel fuels e.g., engines using fuel cell technology; electric engines; engines using liquified or compressed natural gas; diesel engines fueled with biodiesel or ultra-low sulfur fuel; fuel onsite equipment with lower sulfur highway diesel instead of nonroad diesel fuel
- Require heavy duty construction vehicle fleet owners in nonattainment areas to participate in EPA's Clean Fuel Vehicle Fleet Program to gradually increase the percentage of low emission vehicles in their fleets, meet specified federal emission standards for low emission vehicles, and power such vehicles by clean diesel, natural gas, propane, ethanol, methanol or electricity
- Prohibit excessive idling by setting an idling time limit and training employees on requirements (must be in compliance with local municipality's anti-idling regulations; go beyond local requirements if circumstances warrant). Install engine preheater devices to eliminate unnecessary idling.
- Prohibit tampering with equipment to increase horsepower or to defeat emission control device effectiveness
- Require construction vehicle engines to be properly tuned and maintained
- Use construction vehicles with minimum practical engine size for the intended job

Construction site logistics:

- Route diesel truck traffic to and from the construction site away from communities and schools
- Minimize construction-related traffic trips through appropriate policies, implementation measures, and employee education

Construction materials - must meet Architectural Coating Standards for VOCs (since many VOCs are air toxics) - see 63 FR 48848, 9/11/98. There are standards for the following compounds used in road construction:

- Compounds for concrete curing, concrete curing and sealing, concrete protective

- coatings and concrete surface retarders
- Bituminous coating and mastic compounds for asphalt pavement sealing
- Traffic marking coatings (for line painting)
- Zone marking coatings (for driveway lines, parking lots, sidewalks & curbs)

Construction planning:

- Plan for operation needs to reduce emissions, such as high occupancy vehicle (HOV) lane, bike lane, other operation needs (see below)
- Adopt a “Construction Emissions Mitigation Plan (CEMP)” to ensure that procedures for implementation of mitigation measures are adequately defined
- Consult with appropriate Air Quality Management District for existing applicable requirements (e.g., requirements of the State Implementation Plan) at beginning of project; continue periodic consultation throughout construction phase to determine if additional air quality mitigation for criteria air pollutants and/or air toxics is warranted; undertake any necessary additional air quality mitigation in an expeditious manner

Operation phase - include appropriate stakeholders and government entities - ensure that construction phase addresses these needs where necessary

Transportation planning strategies as appropriate to promote:

- Transportation control measures such as employer-subsidized transit passes, telecommuting, work schedule changes, compressed work week, rideshare, parking management (e.g., reduced rates for carpools; parking cash out programs to “buy-out” employee parking spaces), roadway toll/congestion pricing (i.e., higher tolls for peak hours/solo drivers)
- Intelligent transportation systems
- Biking and walking alternatives, which include needs for infrastructure (paved shoulders, adjacent paths, pedestrian- and bicycle-friendly intersections, bike parking and lockers), local transportation district support (to address logistics of bikes on buses, light-rail, etc.), and employer support (such as incentives for biking or walking, provision of showers/lockers, participation in EPA’s Commuter Choice Program, see www.commuterchoice.gov)
- Public education regarding personal vehicle choice and use, e.g., the benefits of high fuel efficiency/low emissions models, proper engine tuning and maintenance, proper tire pressure, avoiding idling, limiting and combining trips

**Possible Mitigation Strategies for Air Quality
(Particulates-Related)
Highway Projects**

Construction site:

- Require permits with time and weather conditions if open burning to clear right-of-way
- Require dust suppression measures on all unpaved work areas, haul out roads, borrow and waste sites, including use of dust suppressant solutions, temporary pavement, aggregate road base, and/or temporary seeding
- Require procedures for loading and covering haul trucks to minimize track out and material spills in transit
- Require frequent cleaning of paved roadway and paving access points

Maintenance phase

- Comply with existing sanding/de-icer/street sweeping requirements in local ordinances or the applicable State Implementation Plan
- Develop sanding program that specifies: (1) sanding material size that will minimize re-entrainment; (2) sanding material testing procedures; (3) record keeping and reporting requirements; and (4) area of application
- Institute street sweeping program that specifies frequency, equipment, record keeping and reporting requirements, and area of application

NORTH I-25 EIS

Environmental Impact Statement for Transportation

MEETING MINUTES

EPA Meeting

MEETING DATE: July 15, 2004

LOCATION: EPA

ATTENDEES: CDOT: Carol Parr, Dave Martinez, Pete Graham, Stan Elmquist
FHWA: Mike Vanderhoof, Melinda Castillo
EPA: Robert Edgar, Deb Lebow, Jeff Kimes
C&B: Gina McAfee
FHU: Gregg Mugele, Art Hirsch, Kevin Maddoux

PREPARER: Carter Burgess
Gina McAfee

COPIES: Attendees, Jerry Piffer, Tom Anzra, Becky Noe, Wendy Wallach,
Chris Primus, Kirk Webb, C&B File #071609 400

MEETING SUMMARY

1. Gina began the meeting by describing the purpose, which is to discuss EPA scoping comments
2. We will definitely assess the alternatives listed on page 1 of the comments and will provide travel characteristics of these.

We need to make sure we compare 2030 travel times (for different alternatives) to existing travel times. Is it possible to compare congestion now with what it might be after a widened I-25 is open to traffic?

3. For air quality, it should not be a problem to provide any of the baseline air quality information. For MSATs, we will do the analysis as suggested in the letter. We should obtain existing emissions levels. We should look at what I-70 is doing in terms of historical emissions levels, existing and future.

Our biggest potential impact may be at transit stations, if we use a diesel locomotive.

For PM₁₀ hot spots, we should do qualitative for conformity. EPA is expecting a quantitative PM₁₀ hot spot modeling. Jeff suggests that we use CAL3QHC for PM₁₀—we need to change settling velocity and deposition rate or velocity. PM₁₀ hot spots could be transit stations, maintenance facilities, interchange locations

NORTH I-25 EIS

environmental cooperation transportation

MEETING MINUTES

*EPA Meeting
July 15, 2004
2 of 3*

We will form an Air Quality Working Group to meet to discuss methodology and project-specific results

The NFRMPO draft 2030 Plan has some I-25 improvements in it.

For mitigation, we should look at cleaner diesel locomotives—there are 2010 standards we should look at

4. Hazardous waste—none of this should be a problem
5. Water quality. Monitoring has been recommended by EPA. This was intended to be during and post construction. The intent is to commit to monitor BMPs in impaired waters. This would be committed to as needed. For existing conditions, we will use existing data from CDPHE and watershed agencies.

For sensitive streams, permanent BMPs will be recommended, consistent with MS4.

We have a concern about using the Driscoll model. Art has a handout that describes his concerns. It has limitations

Art is proposing that we model only in situations where we are proposing to discharge into an impaired stream with no BMPs—or into a stream that is close to being sensitive (with no BMPs). The model Art is recommending is a spreadsheet that breaks the river down into different segments, calculates mass, includes BMPs, and results in an indication of whether or not there is a potential to exceed a standard

FHWA has been working on alternative ways to model water quality. They are planning to come up with a different approach. Mike recommends we wait until after the upcoming course to decide for sure on the water quality modeling approach

For adaptive management, we could commit to monitoring, agency roles, and BMPs.

It is okay with EPA to use a spreadsheet model

Art should talk to Gordon McEvoy and Tom Boyce about this spreadsheet model. We will wait until after the course has been held and then Art will prepare a proposed methodology.

6. For wetlands, we are doing a merger with 404, so will be closely evaluating avoidance alternatives. We will plan to delineate wetlands prior to defining DEIS alternatives.
 7. For maintenance and construction, these suggestions came as a result of T-REX problems. Mag chloride may become an issue. CDOT is doing a new study on mag chloride impacts. Temperature monitoring can be done to determine when to apply mag chloride.
-

NORTH I-25 EIS

environmental cooperation transportation

MEETING MINUTES

*EPA Meeting
July 15, 2004
3 of 3*

8. For EJ, we are not planning to do as exhaustive a study as I-70.
9. Regarding the Delphi Plus technique: we could contact CSU, the I-25 Corridor Plan group, the LUTRAQ—for ideas on the expert panel. If need to, we can break this into two panels.

We may consider forming a Land Use Working Group to provide ongoing guidance.

We are not going to be making recommendations to locals about how to modify their comprehensive plans

In New Hampshire, there were issues about how many wetland acres are impacted and what should be the mitigation commitment

We will be developing a "smart growth" component to our Congestion Management Alternative.

State of Colorado

DEPARTMENT OF TRANSPORTATION
Region 4 - Loveland Residency
2207 E. Highway 402
Loveland, CO 80537-8885



January 21, 2004

Steve Fender
Principal Regional Inspector
Federal Railroad Administration
555 Zang Street, Suite 263
Denver, CO 80228

**Re: North I-25 Front Range EIS
Invitation to a Resource Agency Meeting**

Dear Mr. Fender:

The Colorado Department of Transportation has issued the Notice to Proceed with the North I-25 Front Range Environmental Impact Statement (EIS) process in CDOT Region Four and the Notice of Intent was published in the Federal Register on December 31, 2003. The goal of this project is to prepare an EIS evaluating future transportation alternatives and improvements for the I-25 corridor between Denver and Fort Collins.

Alternatives under consideration include:

1. Taking no action.
2. Improvements to the existing highway network, particularly I-25 but perhaps also US 85 and US 287.
3. Transit options including bus and rail technologies.
4. Constructing a highway at a new location.

We would like to invite you or your designated representative to participate in the scoping meeting for the Resource Agency Team. This meeting will be:

**Thursday, February 26, 2004
2:00 p.m. to 4:00 p.m.
Loveland CDOT Office
2207 E. Highway 402
Loveland, CO 80537**

At this meeting we will provide a summary of our process and would request your input on any particular issues you wish us to study or processes you wish us to follow.

We look forward to working in a partnership with you to conduct this EIS and determine the best transportation options for Northern Colorado.

Sincerely,

David M. Martinez
Project Manager
CDOT N. I-25 Front Range EIS

cc: Project File

Meeting Minutes

Project: North I-25 Front Range EIS

Purpose: Federal Railroad Administration Scoping Meeting

Date Held: March 1, 2004

Location: FRA Offices, 555 Zang Street, Lakewood

Attendees: **FHWA:** Jean Wallace
FRA: Steve Fender
FTA: John Dow
CDOT: Dave Martinez
C&B: Gina McAfee, Danielle Smith, Paul Brown, Craig Gaskill
FHU: Tom Anzia

Copies: Attendees, Holly Miller, File #071609.400

SUMMARY OF DISCUSSION:

1. Gina gave a very brief discussion introduction to the project.
2. FRA is an enforcement agency—primary safety enforcement. They also serve as liaison to passenger rail projects. Commuter rail is an area of interest, particularly in shared freight/passenger corridors. FRA can help if we need help negotiating with the railroads. FRA will get more involved as we move into engineering.
3. Steve went through a PowerPoint presentation (attached).
4. The Denver office is a part of Region 6. The Regional Administrator is in Kansas City.
5. They also regulate tourist-type railroads called excursion railroads—like the Georgetown Loop or the Durango to Silverton line.
6. FRA designates corridors for high-speed rail. They are funding three corridors for maglev back east.
7. PUC regulates surface grade crossings (new ones and closures of public ones) and state safety oversight.
8. FRA will be a Cooperating Agency. We will send a letter of invitation.
9. We will include them on our mailing lists for meetings, especially those related to rail engineering.
10. The whistle blowing proposed rule shortens the warning time to 20 seconds. Communities can install gates with raised medians or alternate safety measures (physical upgrades, signage, education) to reduce the risk threshold. This means no whistles except for other safety requirements. There is a risk index calculator.



U.S. Department
of Transportation

Federal Transit Administration
Region VIII
216 Sixteenth St., Suite 650
Denver, Colorado 80202
(303) 844-3242

Federal Highway Administration
Colorado Division
555 Zang St., Room 250
Lakewood, Colorado 80228
(303) 989-6730

March 10, 2004

Mr. Steve Fender
Chief Inspector
Federal Railroad Administration
555 Zang Street, #263
Lakewood, CO 80228

Re: **North I-25 Front Range EIS
Cooperating Agency Agreement**

Dear Mr. Fender:

The Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA), in cooperation with the Colorado Department of Transportation (CDOT) Region 4, are initiating an Environmental Impact Statement (EIS) for the North I-25 Front Range area, which includes area from Denver Union Station to Fort Collins, to improve transportation and transportation linkages. The transportation improvements may require FRA action and we are requesting that you be a cooperating agency.

Your agency's involvement should entail those areas under its jurisdiction and no direct writing or analysis will be necessary for the documents preparation. The following are activities we will take to maximize interagency cooperation:

1. Include you on mailing lists for coordination meetings.
2. Invite you to meetings related to rail engineering.
3. Consult with you on any relevant technical studies that will be required for the project and share information that may be useful to other studies in the area (US 36, Boulder/ Longmont Feasibility Study and North Metro study).
4. Organize joint field reviews with you; if requested.
5. Provide you with project information, including study results.
6. Encourage your agency to use the above documents to express your review on subjects within your jurisdiction or expertise.



7. Include information in the project environmental documents that cooperating agencies need to carry out their NEPA responsibilities and any other requirements regarding jurisdictional approvals.

We also request that you be available to help us negotiate with the railroad entities within the study area if needed.

You have the right to expect that the EIS will enable you to carry out your jurisdictional responsibilities. Likewise, you have the obligation to tell us if, at any point in the process, your needs are not being met. We expect that at the end of the process the EIS will satisfy any rail safety compliance requirements including those related to project alternatives, environmental consequences and mitigation.

We look forward to your response to this request and your role as a cooperating agency on this project. If you have any questions or would like to discuss in more detail the project or our agencies' respective roles and responsibilities during the preparation of this EIS, please contact Jean Wallace (FHWA) at (303) 969-6730 extension 382 or John Dow (FTA) at (303) 844-3243.

Sincerely yours,


William C. Jones
Division Administrator


Lee O. Waddleton
Regional Administrator

cc: Mr. Dave Martinez, CDOT Region 4 ✓
Mr. Bob Garcia, CDOT Region 4
Mr. Stanley Elmquist, CDOT Region 4
Ms. Carol Parr, CDOT Region 4
Mr. Brad Beckham, CDOT EPB
Mr. Dave Krutsinger, RTD
Mr. John Dow, FTA
File

J:_Transportation\071609.400\manage\corr\Agency\Coop Agency Agreement_FRA.doc



U.S. Department
of Transportation

**Federal Railroad
Administration**

Region VI

DOT Building
901 Locust Street, Suite 464
Kansas City, MO 64106

April 5, 2004

Mr. William C. Jones
Federal Highway Administration
Colorado Division Administrator
555 Zang Street - Ste. 250
Lakewood, Colorado 80228

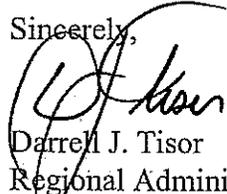
Dear Mr. Jones:

Regarding your correspondence dated March 10, 2004, directed to Steven Fender, the Federal Railroad Administration's (FRA) Chief Inspector at the Lakewood District office. I understand that Environmental Impact Statements (EIS) for the I-25 corridor is being developed. As has been past practice at Denver and in western FRA Region 6, and according to FRA's previous interdepartmental agreements, we formally agree to support these studies as required. We recognize that we may be quite interested in this corridor due to the possibility that passenger rail may be a preferred transportation alternative. FRA is also aware of and preparing for our safety regulation and related responsibilities if these projects develop as anticipated.

As has been past practice, Steven Fender will be the principal contact for FRA on issues such as this. He will continue to manage FRA involvement there as appropriate with the resources he has at his disposal. He will also communicate with our passenger rail team at FRA's Office of Railroad Development and involve them as necessary. Please feel free to continue to communicate with Steve at the Denver FRA office and continue with the relationship that now exists.

Should you need assistance from me at any time, please feel free to call.

Sincerely,


Darrell J. Tisor
Regional Administrator
Region 6

State of Colorado

DEPARTMENT OF TRANSPORTATION
Region 4 - Loveland Residency
2207 E. Highway 402
Loveland, CO 80537-8885



January 21, 2004

Alison Deans-Michael
U.S. Fish and Wildlife Service
755 Parfet, Suite 361
Lakewood, CO 80215

**Re: North I-25 Front Range EIS
Invitation to a Resource Agency Meeting**

Dear Ms. Michael:

The Colorado Department of Transportation has issued the Notice to Proceed with the North I-25 Front Range Environmental Impact Statement (EIS) process in CDOT Region Four and the Notice of Intent was published in the Federal Register on December 31, 2003. The goal of this project is to prepare an EIS evaluating future transportation alternatives and improvements for the I-25 corridor between Denver and Fort Collins.

Alternatives under consideration include:

1. Taking no action.
2. Improvements to the existing highway network, particularly I-25 but perhaps also US 85 and US 287.
3. Transit options including bus and rail technologies.
4. Constructing a highway at a new location.

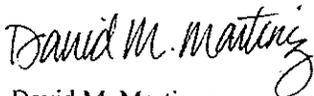
We would like to invite you or your designated representative to participate in the scoping meeting for the Resource Agency Team. This meeting will be:

**Thursday, February 26, 2004
2:00 p.m. to 4:00 p.m.
Loveland CDOT Office
2207 E. Highway 402
Loveland, CO 80537**

At this meeting we will provide a summary of our process and would request your input on any particular issues you wish us to study or processes you wish us to follow.

We look forward to working in a partnership with you to conduct this EIS and determine the best transportation options for Northern Colorado.

Sincerely,



David M. Martinez
Project Manager
CDOT N. I-25 Front Range EIS

cc: Project File



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Ecological Services
Colorado Field Office
755 Parfet Street, Suite 361
Lakewood, Colorado 80215

IN REPLY REFER TO:
ES/CO: ER04/0004
Mail Stop 65412

FEB 20 2004

David Martinez
Resident Engineer
Colorado Department of Transportation, Region 4
2207 East Highway 402
Loveland, Colorado 80537

Dear Mr. Martinez,

The U.S. Fish and Wildlife Service (Service) has reviewed your Notice of Intent (NOI) to prepare an Environmental Impact Statement (EIS) for transportation improvements between Denver and Fort Collins in Denver, Boulder, Broomfield, Adams, Larimer, and Weld Counties, Colorado. We have comments regarding threatened, endangered, and candidate species: migratory birds; and highway permeability to wildlife.

Several species listed under the Endangered Species Act of 1973, as amended (16 U.S.C. 1531 et. seq.) (Act) which may be affected by the proposed action may occur along the corridor. These species include the Preble's meadow jumping mouse (*Zapus hudsonius preblei*), the bald eagle (*Haliaeetus leucocephalus*), the Ute ladies'-tresses orchid (*Spiranthes diluvialis*), and the Colorado butterfly plant (*Gaura neomexicana* ssp. *coloradensis*). The black-tailed prairie dog (*Cynomys ludovicianus*) is a Candidate species under the Act and the Service is interested in their protection and avoiding adversely impacting their habitat to a degree that they would need to be listed and, therefore, protected under the Act. We are also concerned about the effects of depletions to the South Platte River system on downstream species. Transportation projects typically cause depletions through use of water for compaction and dust control, although other uses are conceivable. Impacts to all listed species will need to be addressed in the EIS and consultation under section 7 of the Act may be necessary. In addition, all native bird species are protected by the Migratory Bird Treaty Act, and impacts to them will need to be anticipated and addressed in the EIS.

Maintaining or improving the permeability of highways to all wildlife species is becoming of increasing concern to all wildlife resource agencies, including the Service. We would like to see wildlife movement across the I-25 corridor and animal-vehicle collisions addressed in the EIS.

In your NOI you mention that a new highway alignment is an alternative. Depending on site-specific conditions and plans for the old highway, new alignments are in general not preferred in terms of impacts to wildlife. We look forward to coordinating with you on this alternative.

Thank you for the opportunity to review this project, and we look forward to working with you as it progresses. If the Service can be of further assistance, please contact Alison Deans Michael at 303 275-2378.

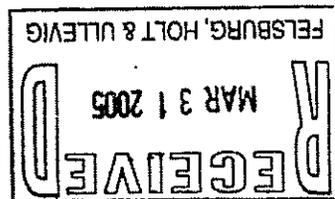
Sincerely,



Susan C. Linner
Colorado Field Supervisor

pc: FWS-RO (Connie Young-Dubovsky)
BFA (ERT)
OEPC, Denver (Regional Environmental Officer)
Michael

Ref:Alison\ERs



October 27, 2004

Jan Fritch
 District Conservationist
 Platte Valley District
 57 West Bromley Lane
 Brighton, CO 80601

RE: North I-25 Front Range EIS

Dear Mr. Fritch

Carter & Burgess, Inc. is assisting the North I-25 Front Range EIS project in developing inter-regional solutions to traffic congestion, mobility problems, safety issues, and air quality problems between the northern Colorado population centers and the Denver metropolitan area. Specifically, the purpose of the study is to investigate a range of transportation alternatives for moving people, goods, and information throughout the region. These alternatives are to include highway improvements, inter-city passenger rail alignments and technologies, and bus and other modal options.

The project area is from US 287 and SH 119 in the west to US 85 in the east; from SH 14 in the north to SH 7 in the south, but the southern boundary includes Denver Union Station for the consideration of passenger rail options.

The legal sections for the study area include:

	R650W	R660W	R670W	R680W	R690W	R700W
T.1N		4 5 6 7 8 9 16 17 18 19 20 21 28 29 30 31 32 33	ALL	ALL	ALL	1 2 3 9 10 11 12 13 14 15 16 17 20 21 22 23 24 25 26 27 28 29 32 33 34 35 36
T.1S		5 6 7 8 17 18 19 20 30 31	ALL	ALL	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 33 34 35 36	1 2 3 4 5 9 10 11 12 13 14 24

October 28, 2004

Tim Carney
 District Manager
 Longmont & Boulder Districts
 9595 Nelson Road, Box D
 Longmont, CO 80501

RE: North I-25 Front Range EIS

Dear Mr. Carney

Carter & Burgess, Inc. is assisting the North I-25 Front Range EIS project in developing inter-regional solutions to traffic congestion, mobility problems, safety issues, and air quality problems between the northern Colorado population centers and the Denver metropolitan area. Specifically, the purpose of the study is to investigate a range of transportation alternatives for moving people, goods, and information throughout the region. These alternatives are to include highway improvements, inter-city passenger rail alignments and technologies, and bus and other modal options.

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T.1S		5 6 7 8 17 18 19 20 30 31	ALL	ALL	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 33 34 35 36	1 2 3 4 5 9 10 11 12 13 14 24

October 27, 2004

Jeanene Hess, District Manager
 Fort Collins District Office
 415 N College Ave., #3
 Ft Collins, CO 80524

RE: North I-25 Front Range EIS

Dear Ms. Hess

Carter & Burgess, Inc. is assisting the North I-25 Front Range EIS project in developing inter-regional solutions to traffic congestion, mobility problems, safety issues, and air quality problems between the northern Colorado population centers and the Denver metropolitan area. Specifically, the purpose of the study is to investigate a range of transportation alternatives for moving people, goods, and information throughout the region. These alternatives are to include highway improvements, inter-city passenger rail alignments and technologies, and bus and other modal options.

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October 27, 2004

Nick Hoban
 District Conservationist
 West Greeley District Office
 4302 W 9th St. Rd.
 Greeley, CO 80634

RE: North I-25 Front Range EIS

Dear Mr. Hoban

Carter & Burgess, Inc. is assisting the North I-25 Front Range EIS project in developing inter-regional solutions to traffic congestion, mobility problems, safety issues, and air quality problems between the northern Colorado population centers and the Denver metropolitan area. Specifically, the purpose of the study is to investigate a range of transportation alternatives for moving people, goods, and information throughout the region. These alternatives are to include highway improvements, inter-city passenger rail alignments and technologies, and bus and other modal options.

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T.1N		4 5 6 7 8 9 16 17 18 19 20 21 28 29 30 31 32 33	ALL	ALL	ALL	1 2 3 9 10 11 12 13 14 15 16 17 20 21 22 23 24 25 26 27 28 29 32 33 34 35 36
T.1S		5 6 7 8 17 18 19 20 30 31	ALL	ALL	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 33 34 35 36	1 2 3 4 5 9 10 11 12 13 14 24

	R650W	R660W	R670W	R680W	R690W	R700W
T.2N		5 6 7 8 17 18 19 20 29 30 31 32	ALL	ALL	1 2 3 4 8 9 10 11 12 13 14 15 16 17 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36	25 35 36
T.2S			1 2 3 4 5 6 7 8 9 10 11 12 14 15 16 17 18 19 20 21 22 27 28 29 30 31 32 33	ALL	1 2 3 11 12 13 14 24 25	
T.3N		4 5 6 7 8 17 18 19 20 29 30 31 32	ALL	ALL	1 2 3 4 9 10 11 12 13 14 15 16 21 22 23 24 25 26 27 28 33 34 35 36	
T.3S			4 5 6 7 8 18	1 2 3 4 5 8 9 10 11 12 13 14 15 16 17 20 21 22 23 24 26 27 28 29 32 33 34 35		
T.4N	6	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 27 28 29 30 31 32 33 34	ALL	ALL	1 2 3 4 9 10 11 12 13 14 15 16 21 22 23 24 25 26 27 28 33 34 35 36	
T.5N	4 5 6 7 8 9 16 17 18 19 20 21 29 30 31 32	ALL	ALL	ALL	1 2 3 4 9 10 11 12 13 14 15 16 21 22 23 24 25 26 27 28 33 34 35 36	
T.6N	5 6 7 8 17 18 19 20 28 29 30 31 32 33	ALL	ALL	ALL	1 2 3 4 9 10 11 12 13 14 15 16 21 22 23 24 25 26 27 28 33 34 35 36	
T.7N	6 7 18 19 29 30 31 32	ALL	ALL	ALL	1 2 3 10 11 12 13 14 15 22 23 24 25 26 27 28 33 34 35 36	
T.8N		4 5 6 7 8 9 10 15 16 17 18 19 20 21 22 23 25 26 27 28 29 30 31 32 33 34 35 36	ALL	ALL	1 11 12 13 14 15 22 23 24 25 26 27 34 35 36	
T.9N		31	19 20 21 25 26 27 28 29 30 31 32 33 34 35 36	24 25 26 27 28 31 32 33 34 35 36		

We have already collected all of the digital soil mapping for the project area. Enclosed for your review is a map of the project study area. Could you please send us a list of any soils that are Prime Farmland, Unique Farmland, Farmland of Statewide Importance, and/or Farmland of Local Importance for your jurisdiction within the study area. The information can be sent or faxed to the following address:

Carter & Burgess, Inc.
Attn: Kirk Webb
707 17th Street, Suite 2300
Denver, CO 80202
Fax: 303.820.2401

Also, please send a request for payment of any fees along with the products. If you have any questions, or need further information, please call me at 303-223-5852, or email me at webbkw@c-b.com.

Sincerely,

Kirk Webb
Environmental Planner

Enclosure

cc: file #071609.401

United States Department of Agriculture



Natural Resources Conservation Service
57 West Bromley Lane
Brighton, Colorado 80601-2697

Phone: 303-659-0525
Fax : 303-659-1768

October 29, 2004

Kirk Webb
Carter & Burgess, Inc.
707 17th Street, Suite 2300
Denver, Colo 80202

Kirk,

As per your request, enclosed are list containing Prime and Important Farmlands soils. I have included lists for the entire project area. The approximate area that is under my work unit are the parts that are in Adams County and the Southern part of Weld County up to about Gilcrest. There are no Unique Farmlands within my work unit and no identified Farmlands of Local Importance that I am aware of.

Project parts not in this area are serviced from other Natural Resources Conservation Service offices. The location of these offices can be found at the web site listed below. On the bottom left of the screen click on Find A Service Center.

The information found on the enclosed sheets is available on the web at;

<http://www.co.nrcs.usda.gov>

under Quick Access locate eFTOG

Section II

Soils Information

Click on the County you want information for

Click on Soils Reports

On Survey Area screen

Click on Generate Reports

On Map Unit screen

Click on Select All

Under drop down menu labeled please select the report that you would like to generate,

Click on Prime & Important Farmlands

Click Generate Report

Please note for Weld County there are choices for Northern Part & Southern Part.

Hopefully this covers the information you requested.

A handwritten signature in cursive script that reads "Jan Fritch".

Jan Fritch
District Conservationist

The Natural Resources Conservation Service provides leadership in a partnership effort to help people conserve, maintain, and improve our natural resources and environment.

An Equal Opportunity Provider and Employer

United States Department of Agriculture



Natural Resources Conservation Service
Greeley Field Office
4302 W 9th Street Rd
Greeley, Colorado 80634-1317

970-356-8097 - Office
970-351-0392 - Fax
www.co.usda.gov
jon.wicke@co.usda.gov

FAX COVER SHEET

From: Jon Wicke
District Conservationist
NRCS – Greeley Field Office

Date: November 1, 2004

To: Kirk Webb, Environmental Planner
Carter & Burgess, Inc.

Fax: (303)820-2401

Pages (including this one): 4

COMMENTS:

Faxing a copy as requested of the Prime and other Important Farmlands reports for Weld County, from both the North and South Weld County Soil Surveys.

Note that these reports are now readily available for public use online, for all counties in Colorado. Following are instructions for accessing this data online:

- Go to www.co.nrcs.usda.gov
- Click on the Technical Resources tab.
- Click on Colorado electronic Field Office Technical Guide/eFOTG.
- Click on the county you would like to access.
- On the Left Hand side of the page, click on Section II.
- Click on Soils Information.
- Scroll down and click on the County you need to collect data for.
- Click on Soil Data Download and Soil Reports
- Click on the Soil Survey you need information from.
- Click on Generate Reports
- In the resulting table, highlight particular soils, or click on Select All if you want to access data for all Soils.
- In the selection box, select the report you need, such as "Prime and Other Important Farmlands"
- Click on Generate Reports.

This could be helpful, since much of the soils information is readily available, you may be able to avoid sending letters out and awaiting the return of needed information. If you have any questions, give me a call at (970)356-8097, x3, or email me at Jon.Wicke@co.usda.gov.

The Natural Resources Conservation Service provides leadership in a partnership effort to help people conserve, maintain, and improve our natural resources and environment.

An Equal Opportunity Provider and Employer

Prime and other Important Farmlands

Weld County, Colorado, Northern Part

Map symbol	Map unit name	Farmland classification
1	Altvan fine sandy loam, 0 to 6 percent slopes	Farmland of statewide importance
4	Ascalon fine sandy loam, 0 to 6 percent slopes	Farmland of statewide importance
15	Bresser sandy loam, 0 to 3 percent slopes	Farmland of statewide importance
17	Bushman fine sandy loam, 0 to 3 percent slopes	Farmland of statewide importance
29	Haverson loam, 0 to 3 percent slopes	Farmland of statewide importance
34	Manter sandy loam, 0 to 6 percent slopes	Farmland of statewide importance
44	Olney fine sandy loam, 0 to 6 percent slopes	Farmland of statewide importance
49	Paoli fine sandy loam, 0 to 6 percent slopes	Farmland of statewide importance
58	Rosebud fine sandy loam, 0 to 6 percent slopes	Farmland of statewide importance
61	Stoneham fine sandy loam, 0 to 6 percent slopes	Farmland of statewide importance
64	Terry sandy loam, 0 to 3 percent slopes	Farmland of statewide importance
73	Vona sandy loam, 0 to 3 percent slopes	Farmland of statewide importance
75	Wages fine sandy loam, 0 to 6 percent slopes	Farmland of statewide importance
80	Manter sandy loam, 0 to 6 percent slopes	Farmland of statewide importance
23	Dacota clay loam, 0 to 6 percent slopes	Prime farmland if irrigated
30	Keith loam, 0 to 6 percent slopes	Prime farmland if irrigated
40	Nunn loam, 0 to 6 percent slopes	Prime farmland if irrigated
41	Nunn clay loam, 0 to 6 percent slopes	Prime farmland if irrigated
54	Platner loam, 0 to 3 percent slopes	Prime farmland if irrigated
77	Weld loam, 0 to 6 percent slopes	Prime farmland if irrigated
79	Ascalon loam, 0 to 6 percent slopes 721104	Prime farmland if irrigated
83	Wages loam, 0 to 6 percent slopes	Prime farmland if irrigated
86	Playas	Prime farmland if protected from flooding or not frequently flooded during the growing season

Prime and other Important Farmlands

Weld County, Colorado, Southern Part

Map symbol	Map unit name	Farmland classification
34	Kim loam, 5 to 9 percent slopes	Farmland of local importance
38	Nelson fine sandy loam, 3 to 9 percent slopes	Farmland of local importance
64	Thedalund loam, 1 to 3 percent slopes	Farmland of local importance
69	Valent sand, 0 to 3 percent slopes	Farmland of local importance
72	Vona loamy sand, 0 to 3 percent slopes	Farmland of local importance
7	Ascalon sandy loam, 5 to 9 percent slopes	Farmland of statewide importance
16	Colby loam, 3 to 5 percent slopes	Farmland of statewide importance
28	Heldt silty clay, 3 to 5 percent slopes	Farmland of statewide importance
33	Kim loam, 3 to 5 percent slopes	Farmland of statewide importance
37	Nelson fine sandy loam, 0 to 3 percent slopes	Farmland of statewide importance
45	Olney loamy sand, 3 to 5 percent slopes	Farmland of statewide importance
48	Olney fine sandy loam, 3 to 5 percent slopes	Farmland of statewide importance
49	Osgood sand, 0 to 3 percent slopes	Farmland of statewide importance
52	Otero sandy loam, 3 to 5 percent slopes	Farmland of statewide importance
56	Rehohill clay loam, 0 to 3 percent slopes	Farmland of statewide importance
67	Ulm clay loam, 3 to 5 percent slopes	Farmland of statewide importance
75	Vona sandy loam, 0 to 1 percent slopes	Farmland of statewide importance
76	Vona sandy loam, 1 to 3 percent slopes	Farmland of statewide importance
80	Weld loam, 3 to 5 percent slopes	Farmland of statewide importance
83	Wiley-Colby complex, 3 to 5 percent slopes	Farmland of statewide importance
87	Platner fine sandy loam	Farmland of statewide importance
3	Aquolls and Aquepts, gravelly substratum	Prime farmland if drained and either protected from flooding or not frequently flooded during the growing season
4	Aquolls and Aquepts, flooded	Prime farmland if drained and either protected from flooding or not frequently flooded during the growing season
1	Altvan loam, 0 to 1 percent slopes	Prime farmland if irrigated
2	Altvan loam, 1 to 3 percent slopes	Prime farmland if irrigated
5	Ascalon sandy loam, 1 to 3 percent slopes	Prime farmland if irrigated
6	Ascalon sandy loam, 3 to 5 percent slopes	Prime farmland if irrigated
8	Ascalon loam, 0 to 1 percent slopes	Prime farmland if irrigated
9	Ascalon loam, 1 to 3 percent slopes	Prime farmland if irrigated
10	Bankard sandy loam, 0 to 3 percent slopes	Prime farmland if irrigated
11	Bresser sandy loam, 0 to 1 percent slopes	Prime farmland if irrigated
12	Bresser sandy loam, 1 to 3 percent slopes	Prime farmland if irrigated
14	Colby loam, 0 to 1 percent slopes	Prime farmland if irrigated
15	Colby loam, 1 to 3 percent slopes	Prime farmland if irrigated
19	Colombo clay loam, 0 to 1 percent slopes	Prime farmland if irrigated
20	Colombo clay loam, 1 to 3 percent slopes	Prime farmland if irrigated
21	Dacono clay loam, 0 to 1 percent slopes	Prime farmland if irrigated
22	Dacono clay loam, 1 to 3 percent slopes	Prime farmland if irrigated
23	Fort Collins loam, 0 to 1 percent slopes	Prime farmland if irrigated
24	Fort Collins loam, 1 to 3 percent slopes	Prime farmland if irrigated
25	Haverson loam, 0 to 1 percent slopes	Prime farmland if irrigated
26	Haverson loam, 1 to 3 percent slopes	Prime farmland if irrigated
27	Heldt silty clay, 1 to 3 percent slopes	Prime farmland if irrigated
29	Julesburg sandy loam, 0 to 1 percent slopes	Prime farmland if irrigated
30	Julesburg sandy loam, 1 to 3 percent slopes	Prime farmland if irrigated
31	Kim loam, 0 to 1 percent slopes	Prime farmland if irrigated

Prime and other Important Farmlands

Weld County, Colorado, Southern Part

Map symbol	Map unit name	Farmland classification
32	Kim loam, 1 to 3 percent slopes	Prime farmland if irrigated
39	Nunn loam, 0 to 1 percent slopes	Prime farmland if irrigated
40	Nunn loam, 1 to 3 percent slopes	Prime farmland if irrigated
41	Nunn clay loam, 0 to 1 percent slopes	Prime farmland if irrigated
42	Nunn clay loam, 1 to 3 percent slopes	Prime farmland if irrigated
43	Nunn loamy sand, 0 to 1 percent slopes	Prime farmland if irrigated
44	Olney loamy sand, 1 to 3 percent slopes	Prime farmland if irrigated
46	Olney fine sandy loam, 0 to 1 percent slopes	Prime farmland if irrigated
47	Olney fine sandy loam, 1 to 3 percent slopes	Prime farmland if irrigated
50	Otero sandy loam, 0 to 1 percent slopes	Prime farmland if irrigated
51	Otero sandy loam, 1 to 3 percent slopes	Prime farmland if irrigated
54	Paoli loam, 0 to 1 percent slopes	Prime farmland if irrigated
55	Paoli loam, 1 to 3 percent slopes	Prime farmland if irrigated
66	Ulm clay loam, 0 to 3 percent slopes	Prime farmland if irrigated
78	Weld loam, 0 to 1 percent slopes	Prime farmland if irrigated
79	Weld loam, 1 to 3 percent slopes	Prime farmland if irrigated
81	Wiley-Colby complex, 0 to 1 percent slopes	Prime farmland if irrigated
82	Wiley-Colby complex, 1 to 3 percent slopes	Prime farmland if irrigated
84	Playas	Prime farmland if protected from flooding or not frequently flooded during the growing season

Carter & Burgess

Consultants in Engineering, Architecture,
Planning and the Environment

MEMO

TO: Jan Fritch – NRCS District Conservationist **DATE:** September 4, 2007
MAILING ADDRESS: Brighton Service Center
57 W Bromley Ln
Brighton, CO 80601-3025
FROM: Shonna Sam
SUBJECT: **North I-25 EIS** **Project No.:** 071609.400
Prime and Important Farmland Impacts/Form
NRCS CPA-106
COPIES: Wendy Wallach; File

The purpose of this memo is to present the impacts to Prime and Important Farmland that have been identified in the North I-25 DE IS. Form NRCS CPA-106 is attached for your review and signature. We would appreciate return of the completed form within 30 days. If you have any questions or concerns please contact me at:

Shonna Sam, AICP
Carter & Burgess, Inc.
Environmental Planner
303-223-5831
shonna.sam@c-b.com

PROJECT DESCRIPTION

The Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA), in cooperation with the Colorado Department of Transportation (CDOT), have initiated preparation of an environmental impact statement (EIS) to identify and evaluate multi-modal transportation improvements along approximately 70 miles of the I-25 corridor from the Fort Collins-Wellington area to Denver. The purpose and need for the improvements is to address mobility, accessibility, safety, and aging infrastructure problems along I-25, as well as to provide for a greater variety of transportation choices and support economic growth.

The regional study area that encompasses the proposed improvements extends from US 287 and the Burlington Northern and Santa Fe (BNSF) Railway routes on the west to US 85 and the Union Pacific Railroad (UPRR) routes on the east (**Figure 1**).

Two multi-modal build packages (Packages A and B) are being evaluated, as well as the No-Action Alternative in accordance with National Environmental Policy Act (NEPA) requirements. Types of highway improvement being considered as a part of the multi-modal packages include highway widening and interchange reconstruction. Transit improvements being considered in the multi-modal packages include commuter rail, commuter bus, and bus rapid transit (BRT) on three different alignments.

Carter Burgess

Consultants in Engineering, Architecture,
Planning and the Environment

MEMO

TO: Boyd Byelich – NRCS District Conservationist **DATE:** September 4, 2007
MAILING ADDRESS: Longmont Service Center
9595 Nelson Road Ste D
Longmont, CO 80501-6359
FROM: Shonna Sam
SUBJECT: **North I-25 EIS** **Project No.:** 071609.400
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Carter Burgess

Consultants in Engineering, Architecture,
Planning and the Environment

MEMO

TO: Todd Boldt – NRCS District Conservationist **DATE:** September 4, 2007
MAILING ADDRESS: Fort Collins Service Center
2150 Centre Ave Bldg A, Suite 116
Fort Collins, CO 80526-8121
FROM: Shonna Sam
SUBJECT: **North I-25 EIS** **Project No.:** 071609.400
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Carter INC Burgess

Consultants in Engineering, Architecture,
Planning and the Environment

MEMO

TO: Jon Wicke – NRCS District Conservationist **DATE:** September 4, 2007
MAILING ADDRESS: Greeley Service Center
4302 West 9th Street Road
Greeley, CO 80634-1317
FROM: Shonna Sam
SUBJECT: **North I-25 EIS** **Project No.:** 071609.400
Prime and Important Farmland Impacts/Form
NRCS CPA-106
COPIES: Wendy Wallach; File

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Shonna Sam, AICP
Carter & Burgess, Inc.
Environmental Planner
303-223-5831
shonna.sam@c-b.com

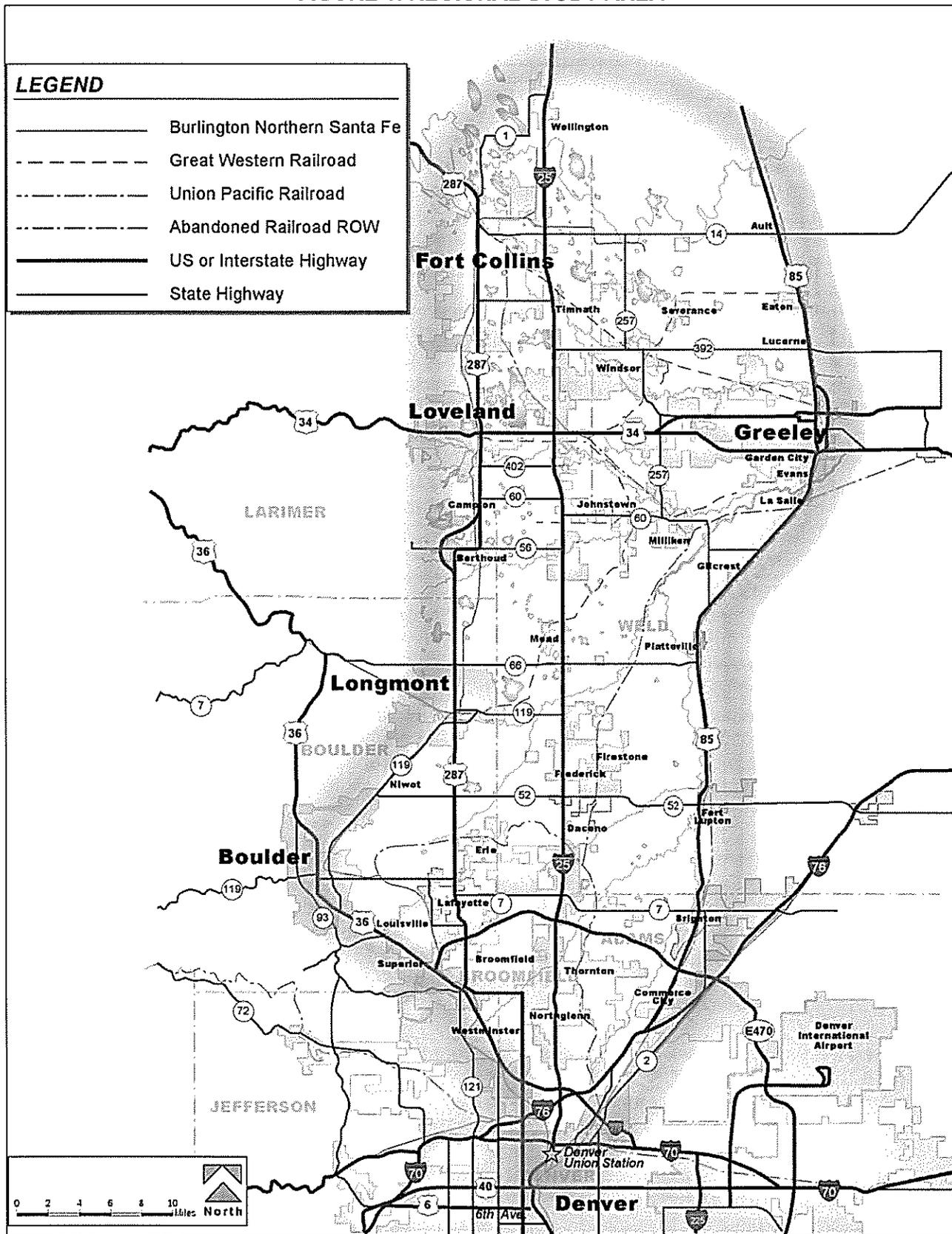
PROJECT DESCRIPTION

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FIGURE 1: REGIONAL STUDY AREA



Package A would include adding one additional general purpose lane in each direction for a total of eight total lanes on I-25. The additional general purpose lanes would extend from SH 14 to the interchange of I-25 with E-470 and Northwest Parkway. Interchange reconstructions would be included. Package A also includes a new double-tracked commuter rail line along the BNSF railroad right-of-way from downtown Fort Collins to the 1st and Terry rail station in Longmont. Additionally a new double-tracked commuter rail line would be built along 119 that would go south along SH 7 to connect with the North Metro end-of-line station in Thornton. Package A also would include nine commuter rail stations and a commuter rail maintenance facility; a commuter bus maintenance facility and feeder bus routes along five east-west routes; and commuter bus service along US 85 between Greeley and Denver Union Station and along E-470 from US 85 to Denver International Airport.

Package B would include adding one buffer-separated tolled express lane to I-25 except for the section between SH 60 and Harmony Road, where two barrier-separated lanes would be added. Tolled express lanes would extend from SH 14 to 84th Avenue in Thornton. Tolled express lanes would be used by high-occupancy vehicles for free, by single-occupancy vehicles if they pay a toll, and by bus rapid transit (BRT) vehicles. Interchange reconstructions would be included. Package B would include 12 BRT stations providing service along I-25, along US 34 into Greeley, and along Harmony Road into Fort Collins. Along US 34 and Harmony Road, the buses would travel in mixed traffic. Package B also would include a bus maintenance facility and feeder bus routes along five east-west streets. In addition, BRT service would be provided along E-470 from I-25 to Denver International Airport.

IMPACT ANALYSIS

Impacts were calculated in Geographic Information Systems (GIS) using soil data downloaded from the NRCS Soil Data Mart and the limits of construction as determined by project design. Soils within Census 2000 urbanized areas and existing highway right-of-way were extracted from the dataset and excluded from analysis. The GIS files that contain the soil data, limits of construction, and calculated impacts are included on the CD attached to this memo. Impacts were assessed for each package by component (e.g., commuter rail, commuter bus, highway widening). As the project continues, components may be repackaged or selected individually for implementation. If repackaging results in additional impacts to farmland, revised data sets and NRCS-CPA -106 forms will be provided.

The total impact to farmland associated with Package A is 982.3 acres (1.8 to Farmland of Local Importance, 44.4 to Farmland of Statewide Importance, and 936.1 to Prime Farmland if irrigated or drained and either protected from flooding or not frequently flooded during the growing season). The total impact to farmland associated with Package B is 926.8 acres (1.7 to Farmland of Local Importance, 35.7 to Farmland of Statewide Importance, and 889.4 to Prime Farmland if irrigated or drained and either protected from flooding or not frequently flooded during the growing season).

Because the project crosses county boundaries, coordination is required with multiple NRCS Service Centers. Each NRCS District Conservationist will receive only the impacts that occur within the counties under their jurisdictions. In **Adams County**, Package A would result in impacts to 30.1 acres of Prime Farmland if Irrigated. Package B would result in 70.2 acres of Prime Farmland if Irrigated. Impacts to any other Prime or Important Farmland classifications are not anticipated. It is important to note that impacts are primarily a result of widening the existing roadway/railway and do not constitute a new alignment through agricultural land. Acres required for the project are immediately adjacent to the existing highway/railway. Impacts that would occur in **Adams County** are shown by location in **Figure 2** for Package A and **Figure 3**

FIGURE 2: DIRECT FARMLAND IMPACTS – PACKAGE A

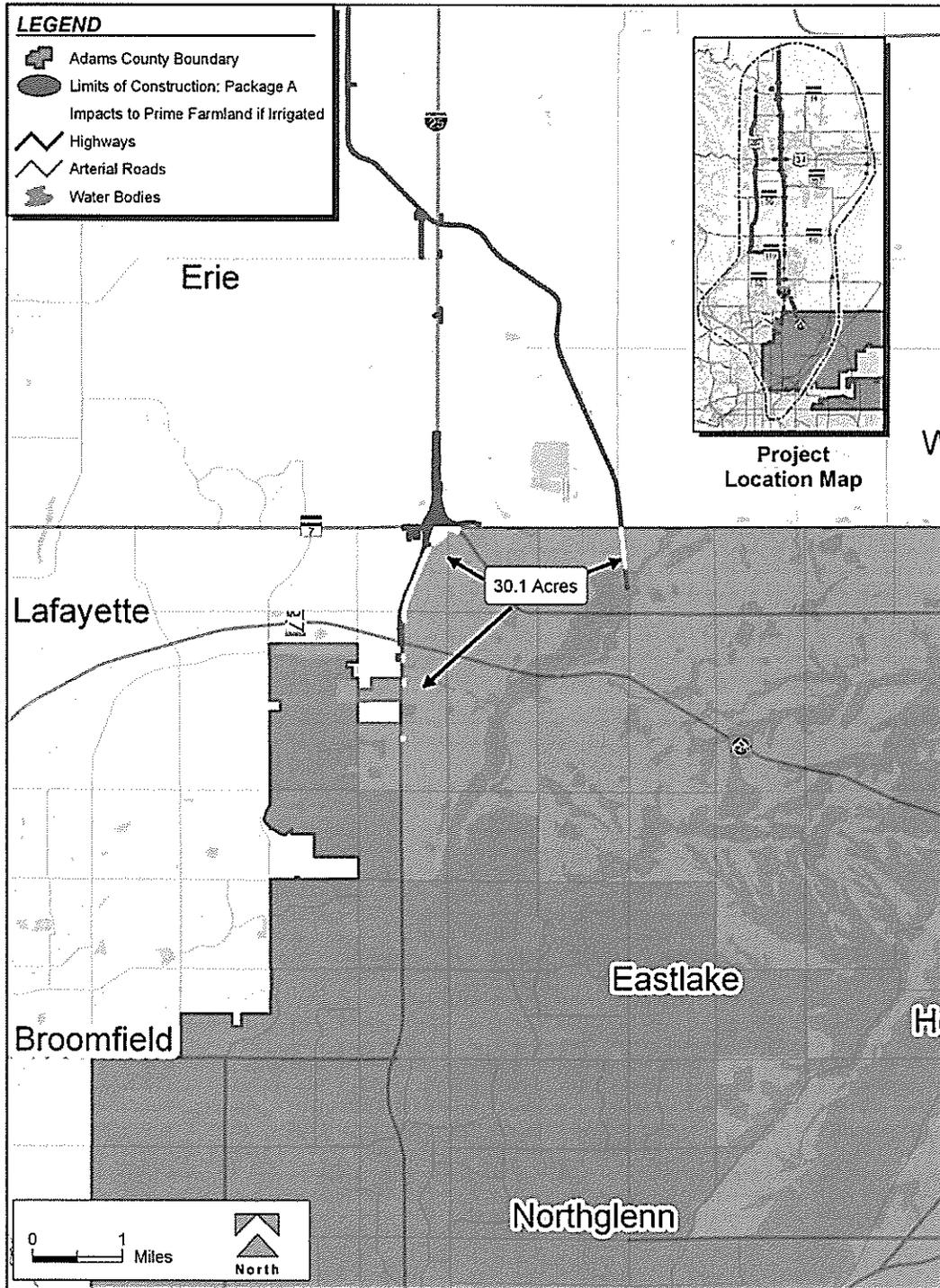
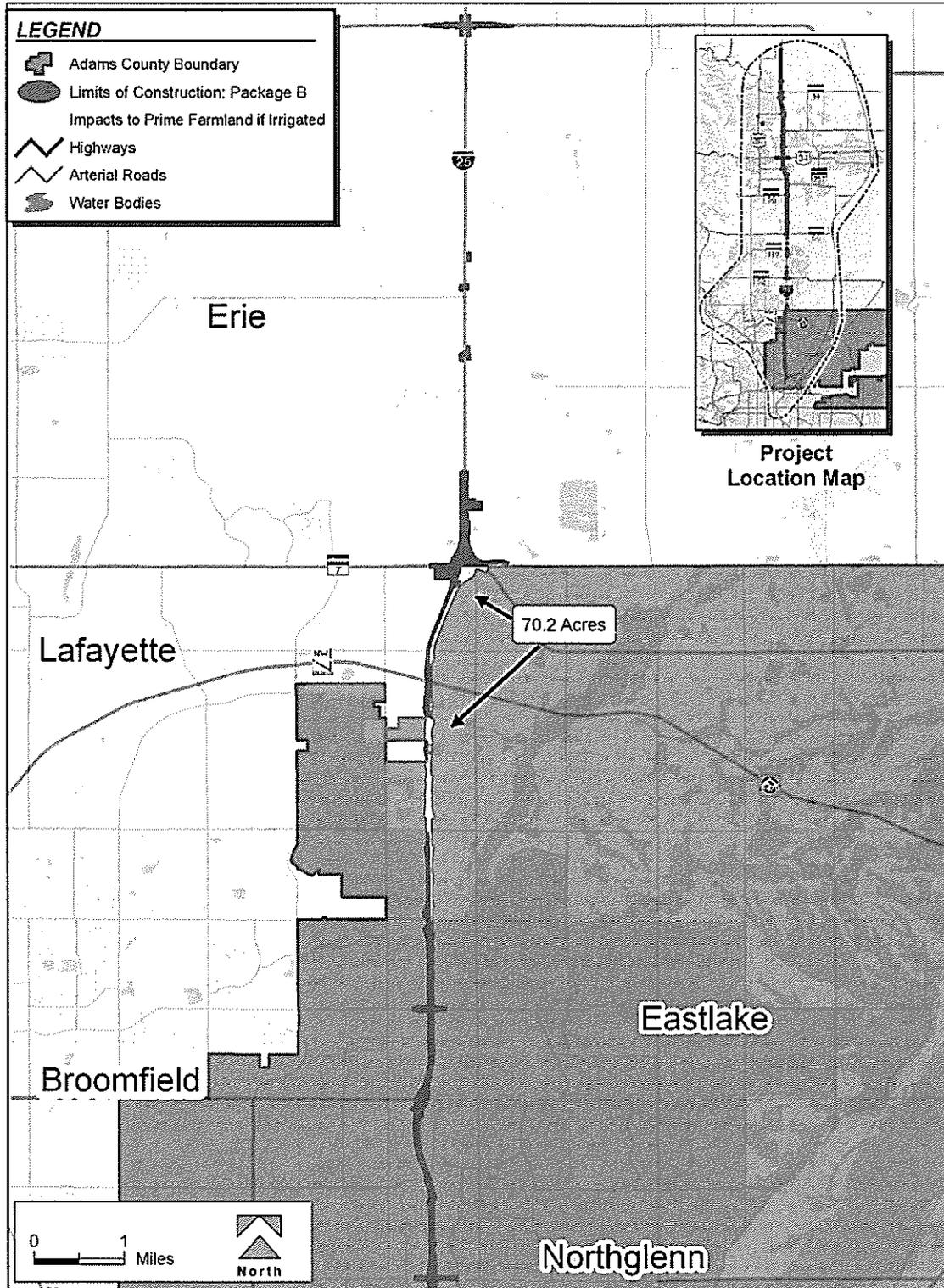


FIGURE 3: DIRECT FARMLAND IMPACTS – PACKAGE B



Thursday, August 16, 2007 11:41:33 AM
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for Package B. Impacts are also reported for NRCS completion and signature on Form NRCS CPA-106. Please send the completed form to:

Carter & Burgess, Inc.
707 17th Street, Suite 2300
Denver, CO 80202

Attention: Shonna Sam, AICP

United States Department of Agriculture



Natural Resources Conservation Service
Fort Collins Field Office
2150 Centre Ave Building A, Ste 116
Fort Collins, Colorado 80526

970-295-5650 - Office
970-295-5668 - Fax
www.co.nrcs.usda.gov
todd.boldt@co.usda.gov

Tuesday, October 09, 2007

Carter & Burgess, Inc
707 17th Street, Suite 2300
Denver, CO 80202

Attn: Shonna Sam

Subject: North I-25 EIS

Enclosed is the completed NRCS-CPA-106 for Larimer County. I apologize for the delay in getting this completed; I had an unexpected leave of absence. If you have questions please don't hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Todd D. Boldt". The signature is written in a cursive style with a long horizontal stroke at the beginning.

Todd D. Boldt
District Conservationist
Fort Collins Field Office

**FARMLAND CONVERSION IMPACT RATING
FOR CORRIDOR TYPE PROJECTS**

PART I (To be completed by Federal Agency)		3. Date of Land Evaluation Request 8/28/07	4. Sheet 1 of _____
1. Name of Project North I-25 EIS		5. Federal Agency Involved FHWA/FTA	
2. Type of Project Transportation		6. County and State Larimer County, Colorado	
PART II (To be completed by NRCS)		1. Date Request Received by NRCS 9-6-07	2. Person Completing Form Tommy Bunn
3. Does the corridor contain prime, unique statewide or local important farmland? (If no, the FPPA does not apply - Do not complete additional parts of this form). YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>		4. Acres Irrigated Average Farm Size 58,837 334 Acres	
5. Major Crop(s) 45% Alfalfa, Corn, Beans, Beans, Barley, Hay	6. Farmable Land in Government Jurisdiction Acres: 521,599 % 53		7. Amount of Farmland As Defined in FPPA Acres: 271,818 % 28
8. Name Of Land Evaluation System Used LESA	9. Name of Local Site Assessment System LARIMER COUNTY LESA		10. Date Land Evaluation Returned by NRCS

PART III (To be completed by Federal Agency)	Alternative Corridor For Segment _____			
	Corridor A	Corridor B	Corridor C	Corridor D
A. Total Acres To Be Converted Directly	567	480		
B. Total Acres To Be Converted Indirectly, Or To Receive Services	125	125		
C. Total Acres In Corridor	692	605	0	0

PART IV (To be completed by NRCS) Land Evaluation Information	Corridor A	Corridor B	Corridor C	Corridor D
A. Total Acres Prime And Unique Farmland	553.4	468.3		
B. Total Acres Statewide And Local Important Farmland	14.0	11.9		
C. Percentage Of Farmland in County Or Local Govt. Unit To Be Converted	.00254	.00222		
D. Percentage Of Farmland in Govt. Jurisdiction With Same Or Higher Relative Value	52.1	52.1		

PART V (To be completed by NRCS) Land Evaluation Information Criterion Relative Value of Farmland to Be Serviced or Converted (Scale of 0 - 100 Points)	Corridor A	Corridor B	Corridor C	Corridor D
	100	100		

PART VI (To be completed by Federal Agency) Corridor Assessment Criteria (These criteria are explained in 7 CFR 658.5(c))	Maximum Points	Corridor A	Corridor B	Corridor C	Corridor D
1. Area in Nonurban Use	15	11	12		
2. Perimeter in Nonurban Use	10	6	7		
3. Percent Of Corridor Being Farmed	20	16	17		
4. Protection Provided By State And Local Government	20	0	0		
5. Size of Present Farm Unit Compared To Average	10	1	1		
6. Creation Of Nonfarmable Farmland	25	21	24		
7. Availability Of Farm Support Services	5	5	5		
8. On-Farm Investments	20	10	10		
9. Effects Of Conversion On Farm Support Services	25	0	0		
10. Compatibility With Existing Agricultural Use	10	5	10		
TOTAL CORRIDOR ASSESSMENT POINTS	160	75	86	0	0

PART VII (To be completed by Federal Agency)	Maximum Points	Corridor A	Corridor B	Corridor C	Corridor D
Relative Value Of Farmland (From Part V)	100	100	100		
Total Corridor Assessment (From Part VI above or a local site assessment)	160	75	86	0	0
TOTAL POINTS (Total of above 2 lines)	260	175	186	0	0

1. Corridor Selected:	2. Total Acres of Farmlands to be Converted by Project:	3. Date Of Selection:	4. Was A Local Site Assessment Used? YES <input type="checkbox"/> NO <input type="checkbox"/>
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5. Reason For Selection:

Signature of Person Completing this Part: _____ DATE _____

NOTE: Complete a form for each segment with more than one Alternate Corridor

**FARMLAND CONVERSION IMPACT RATING
FOR CORRIDOR TYPE PROJECTS**

PART I (To be completed by Federal Agency)		3. Date of Land Evaluation Request	8/28/07	4. Sheet 1 of 1
1. Name of Project North I-25 EIS		5. Federal Agency Involved FHWA/FTA		
2. Type of Project Transportation		6. County and State Boulder/Broomfield, Colorado		
PART II (To be completed by NRCS)		1. Date Request Received by NRCS	2. Person Completing Form BOYD BYELICH	
3. Does the corridor contain prime, unique statewide or local important farmland? (If no, the FPPA does not apply - Do not complete additional parts of this form).		YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	4. Acres Irrigated	Average Farm Size
5. Major Crop(s) CORN, ALFALFA		6. Farnable Land in Government Jurisdiction Acres: 107,629 % 23	31,403	140
8. Name Of Land Evaluation System Used N/A		9. Name of Local Site Assessment System N/A	7. Amount of Farmland As Defined in FPPA Acres: 102,600 % 95	
			10. Date Land Evaluation Returned by NRCS 9-	

	Alternative Corridor For Segment			
	Corridor A	Corridor B	Corridor C	Corridor D
A. Total Acres To Be Converted Directly	72	91		
B. Total Acres To Be Converted Indirectly, Or To Receive Services	0	20		
C. Total Acres In Corridor	72	111	0	0

PART IV (To be completed by NRCS) Land Evaluation Information				
A. Total Acres Prime And Unique Farmland	67	88		
B. Total Acres Statewide And Local Important Farmland	5	3		
C. Percentage Of Farmland in County Or Local Govt. Unit To Be Converted	80.7%	80.9%		
D. Percentage Of Farmland in Govt. Jurisdiction With Same Or Higher Relative Value	31.5%	31.5%		

PART V (To be completed by NRCS) Land Evaluation Information Criterion Relative value of Farmland to Be Serviced or Converted (Scale of 0 - 100 Points)

PART VI (To be completed by Federal Agency) Corridor Assessment Criteria (These criteria are explained in 7 CFR 658.5(c))	Maximum Points				
		1. Area in Nonurban Use	15	10	12
2. Perimeter in Nonurban Use	10	5	10		
3. Percent Of Corridor Being Farmed	20	3	6		
4. Protection Provided By State And Local Government	20	0	0		
5. Size of Present Farm Unit Compared To Average	10	5	5		
6. Creation Of Nonfarmable Farmland	25	0	21		
7. Availability Of Farm Support Services	5	5	5		
8. On-Farm Investments	20	10	10		
9. Effects Of Conversion On Farm Support Services	25	0	0		
10. Compatibility With Existing Agricultural Use	10	5	5		
TOTAL CORRIDOR ASSESSMENT POINTS	160	43	74	0	

PART VII (To be completed by Federal Agency)				
Relative Value Of Farmland (From Part V)	100	95.7	95.7	
Total Corridor Assessment (From Part VI above or a local site assessment)	160	43	74	0
TOTAL POINTS (Total of above 2 lines)	260	138.7	169.7	0

1. Corridor Selected:	2. Total Acres of Farmlands to be Converted by Project:	3. Date Of Selection:	4. Was A Local Site Assessment Used? YES <input type="checkbox"/> NO <input type="checkbox"/>
-----------------------	---	-----------------------	--

5. Reason For Selection:

Signature of Person Completing this Part: _____ DATE _____

NOTE: Complete a form for each segment with more than one Alternate Corridor

FARMLAND CONVERSION IMPACT RATING
FOR CORRIDOR TYPE PROJECTS

PART I (To be completed by Federal Agency)		3. Date of Land Evaluation Request	8/28/07	4. Sheet 1 of _____
1. Name of Project		5. Federal Agency Involved		
North I-25 EIS		FHWA/FTA		
2. Type of Project		6. County and State		
Transportation		Adams County, Colorado		
PART II (To be completed by NRCS)		1. Date Request Received by NRCS	2. Person Completing Form	
		9-6-2007	Fritch	
3. Does the corridor contain prime, unique statewide or local important farmland? (If no, the FPPA does not apply - Do not complete additional parts of this form).		YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>	4. Acres Irrigated Average Farm Size
				28890 964
5. Major Crop(s)	6. Farmable Land in Government Jurisdiction		7. Amount of Farmland As Defined in FPPA	
Corn Alfalfa	Acres: 701,471 % 93.0		Acres: 421,721 % 56	
8. Name Of Land Evaluation System Used	9. Name of Local Site Assessment System		10. Date Land Evaluation Returned by NRCS	
LESA	NA		9-19-2007	

PART III (To be completed by Federal Agency)	Alternative Corridor For Segment _____			
	Corridor A	Corridor B	Corridor C	Corridor D
A. Total Acres To Be Converted Directly	30	70		
B. Total Acres To Be Converted Indirectly, Or To Receive Services	0	0		
C. Total Acres In Corridor	30	70	0	0

PART IV (To be completed by NRCS) Land Evaluation Information				
A. Total Acres Prime And Unique Farmland	30	70		
B. Total Acres Statewide And Local Important Farmland				
C. Percentage Of Farmland in County Or Local Govt. Unit To Be Converted	00004%	00009%		
D. Percentage Of Farmland in Govt. Jurisdiction With Same Or Higher Relative Value	10.2%	10.7%		

PART V (To be completed by NRCS) Land Evaluation Information Criterion Relative value of Farmland to Be Serviced or Converted (Scale of 0 - 100 Points)				
	95.7	95.7		

PART VI (To be completed by Federal Agency) Corridor Assessment Criteria (These criteria are explained in 7 CFR 658.5(c))	Maximum Points	Alternative Corridor For Segment _____			
		Corridor A	Corridor B	Corridor C	Corridor D
1. Area in Nonurban Use	15	5	3		
2. Perimeter in Nonurban Use	10	5	4		
3. Percent Of Corridor Being Farmed	20	2	0		
4. Protection Provided By State And Local Government	20	0	0		
5. Size of Present Farm Unit Compared To Average	10	0	0		
6. Creation Of Nonfarmable Farmland	25	0	0		
7. Availability Of Farm Support Services	5	5	5		
8. On-Farm Investments	20	10	10		
9. Effects Of Conversion On Farm Support Services	25	0	0		
10. Compatibility With Existing Agricultural Use	10	10	10		
TOTAL CORRIDOR ASSESSMENT POINTS	160	37	32	0	0

PART VII (To be completed by Federal Agency)				
Relative Value Of Farmland (From Part V)	100	95.7		
Total Corridor Assessment (From Part VI above or a local site assessment)	160	37	32	0
TOTAL POINTS (Total of above 2 lines)	260	132.7	121.7	0

1. Corridor Selected:	2. Total Acres of Farmlands to be Converted by Project:	3. Date Of Selection:	4. Was A Local Site Assessment Used? YES <input type="checkbox"/> NO <input type="checkbox"/>
-----------------------	---	-----------------------	--

5. Reason For Selection:

Signature of Person Completing this Part: _____ DATE _____

NOTE: Complete a form for each segment with more than one Alternate Corridor

FARMLAND CONVERSION IMPACT RATING
FOR CORRIDOR TYPE PROJECTS

PART I (To be completed by Federal Agency)		3. Date of Land Evaluation Request	8/28/07	4. Sheet 1 of _____
1. Name of Project	North I-25 EIS	5. Federal Agency Involved	FHWA/FTA	
2. Type of Project	Transportation	6. County and State	Weld County, Colorado	

PART II (To be completed by NRCS)		1. Date Request Received by NRCS	9-5-08	2. Person Completing Form	Raymond Mowery Jr
3. Does the corridor contain prime, unique statewide or local important farmland? (If no, the FPPA does not apply - Do not complete additional parts of this form).		YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>	4. Acres Irrigated	326,494
5. Major Crop(s)		6. Farmable Land in Government Jurisdiction	Acre: 878,101	Average Farm Size	158 ac
8. Name of Land Evaluation System Used		7. Amount of Farmland As Defined in FPPA	Acre: 878,101	%	37
9. Name of Local Site Assessment System		10. Date Land Evaluation Returned by NRCS	9-5-08		

	Alternative Corridor For Segment			
	Corridor A	Corridor B	Corridor C	Corridor D
A. Total Acres To Be Converted Directly	313	285		
B. Total Acres To Be Converted Indirectly, Or To Receive Services	40	40		
C. Total Acres In Corridor	353	325	0	0

PART IV (To be completed by NRCS) Land Evaluation Information				
A. Total Acres Prime And Unique Farmland	285.9	263.3		
B. Total Acres Statewide And Local Important Farmland	27.3	21.9		
C. Percentage Of Farmland in County Or Local Govt. Unit To Be Converted	0.0004	0.00037		
D. Percentage Of Farmland in Govt. Jurisdiction With Same Or Higher Relative Value	0.0004	0.00037		

PART V (To be completed by NRCS) Land Evaluation Information Criterion Relative value of Farmland to Be Serviced or Converted (Scale of 0 - 100 Points)				
	87	85		

PART VI (To be completed by Federal Agency) Corridor Assessment Criteria (These criteria are explained in 7 CFR 658.5(c))	Maximum Points				
		1. Area in Nonurban Use	15	14	14
2. Perimeter in Nonurban Use	10	9	9		
3. Percent Of Corridor Being Farmed	20	17	17		
4. Protection Provided By State And Local Government	20	0	0		
5. Size of Present Farm Unit Compared To Average	10	2	2		
6. Creation Of Nonfarmable Farmland	25	15	15		
7. Availability Of Farm Support Services	5	5	5		
8. On-Farm Investments	20	10	10		
9. Effects Of Conversion On Farm Support Services	25	0	0		
10. Compatibility With Existing Agricultural Use	10	5	10		
TOTAL CORRIDOR ASSESSMENT POINTS	160	77	82	0	

PART VII (To be completed by Federal Agency)				
Relative Value Of Farmland (From Part V)	100	87	85	
Total Corridor Assessment (From Part VI above or a local site assessment)	160	77	82	0
TOTAL POINTS (Total of above 2 lines)	260	164	167	0

1. Corridor Selected:	2. Total Acres of Farmlands to be Converted by Project:	3. Date Of Selection:	4. Was A Local Site Assessment Used? YES <input type="checkbox"/> NO <input type="checkbox"/>
5. Reason For Selection:			

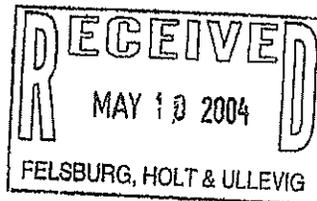
Signature of Person Completing this Part: _____ DATE _____

NOTE: Complete a form for each segment with more than one Alternate Corridor



ENVIRONMENTAL
~~EIS~~ ARCHAEO/HISTORICAL

Route Slip
Federal Highway Administration
Colorado Federal Aid Division



Date: 5/6/2004

From: Mike Vanderhoof, Env. Program Manager
(303) 969-6730, ext. 331

To: Dan Jepson, CDOT Environmental Programs
Carol Parr, CDOT Region 4 Env.
Tom Anzla, FHU
Gina McAfee, C-B

- | | |
|--|---|
| <input type="checkbox"/> Per Your Request | <input type="checkbox"/> For Your Signature |
| <input checked="" type="checkbox"/> For Your Information | <input type="checkbox"/> Comment |
| <input type="checkbox"/> Per Our Conversation | <input type="checkbox"/> Take Appropriate Action |
| <input type="checkbox"/> Note and Return | <input type="checkbox"/> Prepare Reply for Signature of |
| <input type="checkbox"/> Discuss With Me | |
| <input type="checkbox"/> For your Approval | |

Remarks:

Attached is a copy of a letter (with attachments) dated April 20, 2004, from FTA/FHWA to Ms. Maxine Natchees, regarding North I-25 Front Range EIS. Also attached is a list of individuals who received an identical letter and copy notations were made as appropriate from the additional list attached.

Attachments: 6
Copy: Jean Wallace, FHWA
John Dow, FTA
File



U.S. Department
Of Transportation

Federal Highway Administration
555 Zang Street, Room 250
Lakewood, CO 80228-1040

Federal Transit Administration
216 Sixteenth Street, Suite 650
Denver, CO 80202-5120

April 20, 2004

Ms. Maxine Natchees, Chairwoman
Uintah and Ouray Tribal Business Committee
P.O. Box 190
Ft. Duchesne, UT 84026

Dear Ms. Natchees:

Subject: Request for Section 106 Consultation, North I-25
Front Range Environmental Impact Statement, Adams,
Boulder, Broomfield, Denver, Jefferson, Larimer and
Weld Counties, Colorado

The Federal Highway Administration (FHWA) and Federal Transit Administration (FTA), in cooperation with the Colorado Department of Transportation (CDOT) and Regional Transportation District (RTD), are preparing an Environmental Impact Statement (EIS) on a proposal to address transportation demand along a segment of Interstate 25 between Denver and Fort Collins, Colorado (please refer to the enclosed maps). Improvements to this severely congested corridor, as well as portions of adjacent and closely related roadways and other transportation corridors, are needed in order to address substandard capacity and safety conditions in a fast-growing environment. Pursuant to the National Environmental Policy Act (NEPA) of 1969 and the Council on Environmental Quality implementing regulations (40 CFR 1500-1508), FHWA, FTA and CDOT are documenting the potential social, economic and environmental consequences of this action in an EIS.

The agencies are seeking the participation of regional tribal governments as described in Section 106 of the National Historic Preservation Act implementing regulations 36 CFR 800 et seq. As a consulting party, you are offered the opportunity to identify traditional cultural and religious properties, evaluate significance of these properties and how the project might affect them. Further, if it is found that the project will impact cultural resources that are eligible for inclusion on the National Register of Historic Places and are of religious or cultural significance to your tribe, your role in the consultation process would include participation in resolving how best to avoid, minimize, or mitigate those impacts. If you have interest in this project and in cultural resources that may be of religious or cultural significance to your tribe, we invite you to be a consulting party.



The Area of Potential Effect (APE) for the undertaking, as defined by 36 CFR 800.16(d), has not been determined because of the large size of the study area, which incorporates an enormous area between Denver and Fort Collins, Colorado. The agencies intend to perform a records review to identify known historic properties within the corridor and use that information to develop and screen improvement alternatives down to those that will be evaluated in detail. An APE will be developed for each alternative that is much smaller than the area identified on the enclosed map. A comprehensive survey and assessment of historic properties within that APE will be conducted. Once this task has been completed, all interested parties and consulting tribes will be apprised of the results and asked to comment. We would appreciate any information you have that may locate cultural resources in this corridor so that they may be considered with other known resources.

The EIS process will entail an analysis of the secondary and cumulative effects of the undertaking, which will include past, present and reasonably foreseeable future projects. If you have any input on issues of concern from the standpoint of secondary or cumulative impacts, please let us know. Also, the North Front Range area is home to a number of American Indian people. As such, if you are aware of members of your tribe living in proximity to the study area who would be interested in participating in the NEPA consultation process on some level, please notify us so that we can facilitate that interaction.

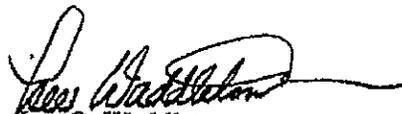
We are committed to ensuring that tribal governments are informed of, and involved in, decisions that may impact places that have religious or cultural significance. If you are interested in becoming a consulting party for the North I-25 EIS, please complete and return the enclosed Consultation Interest Response Form to CDOT Native American liaison Dan Jepson within 60 days of receipt (the mailing address and facsimile number for Mr. Jepson are listed at the bottom of that sheet). Mr. Jepson can also be reached via E-mail at Daniel.Jepson@dot.state.co.us or by telephone at (303) 757-9631. The 60-day period has been established to encourage your participation at this stage in project development. Failure to respond within this time frame will not prevent your tribe from becoming a consulting party at a later date. However, studies and decision-making will proceed and it may become difficult to reconsider previous determinations or findings, unless significant new information is introduced.

Thank you for considering this request for consultation.

Very truly yours,



for William C. Jones
FHWA Division Administrator



Lee O. Waddleton
FTA Regional Administrator

Enclosures

cc: Ms. Betsy Chapoose, Director, Cultural Rights & Protection Office
Ms. Jean Wallace, FHWA
Mr. John Dow, FTA
Mr. Daniel Jepson, CDOT Env. Programs
Ms. Carol Parr, CDOT Region 4 Env.
Mr. Tom Anzia, FHU
Ms. Gina McAfee, C-B

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

PROJECT: North I-25 Front Range Environmental Impact Statement

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

Signed: _____
Name and Title

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

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

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

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

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

Yes No If yes, please explain.

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

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

Yes No If yes, please explain.

Please complete and return this form within 60 days via US Mail or fax to:

Dan Jepson, Section 106 Native American Liaison
Colorado Department of Transportation
Environmental Programs Branch
4201 E. Arkansas Ave.
Denver, CO 80222
FAX: (303)757-9445

MS. MAXINE NATCHES
CHAIRWOMAN, UINTAH & OURAY
TRIBAL BUSINESS COMMITTEE
P.O. BOX 190
FORT DUCHESNE, UT 84026

MR. HOWARD RICHARDS
CHAIRMAN
SOUTHERN UTE INDIAN TRIBE
P.O. BOX 737
IGNACIO, CO 81137

MR. ROBERT TABOR
CHAIRMAN, CHEYENNE &
ARAPAHO BUS COMMITTEE
PO BOX 38
CONCHO, OK 73022

MR. BURTON HUTCHINSON
CHAIRMAN, NORTHERN
ARAPAHO TRIBE BUSINESS COUNCIL
P.O. BOX 396
FORT WASHAKIE, WY 82514

MS. GERI SMALL
CHAIRWOMAN
NORTHERN CHEYENNE TRIBE
P.O. BOX 128
LAME DEER, MT 59043

MR. HAROLD C. FRAZIER
CHAIRMAN
CHEYENNE RIVER SIOUX TRIBAL COUNCIL
P.O. BOX 590
EAGLE BUTTE, SD 57625

MS. ROXANNE SAZUE
CHAIRWOMAN
CROW CREEK SIOUX TRIBAL COUNCIL
P.O. BOX 658
FORT THOMPSON, SD 57325

MR. WILLIAM KINDLE
PRESIDENT
ROSEBUD SIOUX TRIBE
P.O. BOX 430
ROSEBUD, SD 57570

MR. JOHN YELLOWBIRD
PRESIDENT
OGLALA SIOUX TRIBAL COUNCIL
P.O. BOX H
PINE RIDGE, SD 57770

MR. GEORGE E. HOWELL
PRESIDENT
PAWNEE NATION OF OKLAHOMA
P.O. BOX 470, BLDG. 64
PAWNEE, OK 74058

MR. HAROLD CUTHAIR
ACTING CHAIRMAN
UTE MOUNTAIN UTE TRIBE
P.O. BOX 348
TOWAOC, CO 81334

MS. MARY JANE YAZZIE
CHAIRWOMAN
WHITE MESA UTE TRIBAL COUNCIL
P.O. BOX 7096
WHITE MESA, UT 84511

MR. CLIFFORD MCKENZIE
CHAIRMAN
KIOWA TRIBE OF OKLAHOMA
P.O. BOX 369
CARNEGIE, OK 73015

MR. WALLACE COFFEY
CHAIRMAN, COMANCHE TRIBAL
BUSINESS COMMITTEE
P. O. BOX 908
LAWTON, OK 73502

MR. CHARLES W. MURPHY
CHAIRMAN, STANDING
ROCK SIOUX TRIBAL COUNCIL
P.O. BOX D
FORT YATES, ND 58538

Original letters mailed to each
of the above

MR WILLIAM L PEDRO
NAGPRA REPRESENTATIVE
CHEYENNE & ARAPAHO TRIBES
OF OKLAHOMA
PO BOX 41
CONCHO OK 73022

MR GORDON YELLOWMAN
NHPA/TRANSPORTATION PLANNER
CHEYENNE & ARAPAHO TRIBES/OKLA
ROADS CONSTRUCTION PROGRAM
PO BOX 137
CONCHO OK 73022

MR JIMMY ARTERBERRY
THPO/NAGPRA - DIRECTOR
COMANCHE NATION OF OK
PO BOX 908
LAWTON OK 73502

MS ALICE ALEXANDER
TRIBAL HISTORIC PRESERVATION
OFFICER, PAWNBE NATION/OKLA
PO BOX 470
PAWNBE, OK 74058

MR TERRY G KNIGHT
NAGPRA REPRESENTATIVE
UTE MOUNTAIN UTE INDIAN TRIBE
PO BOX 102
TOWAOC, CO 81334

TERRY GRAY
(ROSEBUD SIOUX)
NAGPRA COORDINATOR
SGU HERITAGE CENTER
BOX 675
MISSION, SD 57555

MR JOE BIG MEDICINE
NAGPRA REPRESENTATIVE
CHEYENNE & ARAPAHO TRIBES
OF OKLAHOMA
500 S LEACH, APT 36
WATONGA OK 73772

MR GILBERT BRADY
TRIBAL HISTORIC PRESERVATION
OFFICER
NORTHERN CHEYENNE TRIBE
P.O. BOX 128
LAME DEER MT 59043

MR ROBERT GOGGLES
NAGPRA REPRESENTATIVE
NORTHERN ARAPAHO TRIBE
PO BOX 396
FORT WASHAKIE, WY 82514

MR NEIL CLOUD
NAGPRA REPRESENTATIVE
CULTURE PRESERVATION OFFICE
SOUTHERN UTE INDIAN TRIBE
P.O. BOX 737
IGNACIO, CO 81137

MR JIM PICOTTE
NAGPRA REPRESENTATIVE
CHEYENNE RIVER SIOUX TRIBE
PO BOX 590
EAGLE BUTTE, SD 57625

MR ALONZO SANKEY
NAGPRA REPRESENTATIVE
CHEYENNE & ARAPAHO TRIBES/OKLA
P. O. BOX 836
CANTON, OK 73724

REVEREND GEORGE DAINGKAU
NAGPRA REPRESENTATIVE
• KIOWA TRIBE OF OKLAHOMA
118 N STEPHENS
HOBART OK 73015

MR HOWARD BROWN, CHAIR
ECONOMIC DEVELOPMENT COMMISSION
NORTHERN ARAPAHO TRIBE
PO BOX 9079
ARAPAHOE, WY 82510

MS BETSY CHAPOOSE, DIRECTOR
CULTURAL RIGHTS & PROTECTION
OFFICE
NORTHERN UTE TRIBE
PO BOX 190
FT DUCHESNE UT 84026

TIM MENTZ
STANDING ROCK SIOUX TRIBE
CULTURAL RESOURCE PLANNER
PO BOX D
FT YATES, ND 58538

Jepson, Daniel

From: George Daingkau [pastor04@sbcglobal.net]
Sent: Wednesday, May 12, 2004 9:23 PM
To: Jepson, Daniel
Subject: Impact studies

These tracts of ejs, or ea is what I am consulting you about today.

State Hwy 402, US 287 to I-25; Larimer County, Colo.
 I-25 Front Range EIS Adams, Boulder, Broomfield, Denver, Larimer and Weld Counties
 Powers Boulevard EA, El Paso County, Colo.

Powers Boulevard under taking is an existing road? Construction on widening it out?
 What unsurveyed areas are you taking about? What ejs do you have now? What ROW does
 CDOT have to do improvements?

In talking with the Elders on this road, there would have been many sites but since the
 construction of past roads and hwy's many of the sites were destroyed and now they want to
 consult us? I think what they met was that if new reality would be disturbed out side of the ROW
 then there would need to be an on site visit made.

Front Range: The I-25 that is existing now does not provide enough road way? These
 substandard roads your talking about, does it mean pull-offs, road parks, rest area, loops, off and
 on ramps, and (4) four more lanes?

Kiowa is known to be in this area up and down the East range of Colorado, so there must be
 some sites along this corridor. In this study area are you or CDOT asking for Tribal monitors to
 help with this undertaking? The only answer I can give now is we want to be a consulting party.

↙ State Hwy 402 US 287 to I-25; Yes we will become a consulting party when this project is
 underway.

Well Dan, hope this helps. About the signing of the PEIS is still in limbo because now I am told
 there are some discrepancies on our newly appointed vice-chairman, or if he can sign at all. Be
 safe, Rev. Daingkau

5/14/2004



U.S. Department
Of Transportation
Federal Highway
Administration
16th Street, N.W.
Washington, D.C. 20530

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

July 20, 2004

Ms. Blaine Atzitty
Council Representative
White Mesa Ute Tribe
P.O. Box 7096
White Mesa, UT 84511

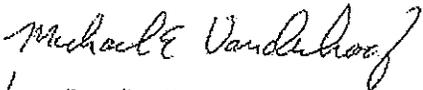
Dear Ms. Atzitty:

Subject: Request for Section 106 Consultation, North I-25
Front Range Environmental Impact Statement, Adams,
Boulder, Broomfield, Denver, Jefferson, Larimer and
Weld Counties, Colorado

Thank you for your request for a copy of our April 20, 2004, consultation letter. We are enclosing a file copy with a complete recipient list, location map, and tribal interest response form. As noted, the purpose of the letter is to request participation of regional tribal governments in consultation as required by Section 106 the National Historic Preservation Act.

We look forward to your response. If you have any questions or comments, please contact Mr. Michael Vanderhoof, Environmental Program Manager, at 720-963-3013, or Mr. Dan Jepson, Colorado Department of Transportation, at 303-757-9631.

Sincerely yours,


for Douglas Bennett
Acting Division Administrator

Enclosures

cc: Ms. Jean Wallace, FHWA
Mr. Dave Beckhouse, FTA
Mr. Daniel Jepson, CDOT Env. Programs ✓
Ms. Carol Parr, CDOT Region 4 Env.
Mr. Tom Anzia, FHU
Ms. Gina McAfee, C-B





U.S. Department
Of Transportation
Federal Highway
Administration

Colorado Federal Aid Division
12300 W. Dakota Ave., Ste. 180
Lakewood, CO 80228-1040

July 23, 2004

File: 14276, 13599

Mr. Howard Brown
Chairman
Economic Development Commission
Northern Arapaho Tribe
P.O. Box 9079
Arapahoe, WY 82510

Subject: ~~Request for Section 106 Consultation, North I-25
Front Range Environmental Impact Statement, Adams,
Boulder, Broomfield, Denver, Jefferson, Larimer and
Weld Counties, Colorado~~

Request for Section 106 Consultation, Interstate 70
East Corridor Environmental Impact Statement,
Adams, Arapahoe and Denver Counties, Colorado

Dear Mr. Brown:

Thank you for your request for a copy of the April 20, 2004 consultation letters for our North I-25 Front Range, and I-70 East Corridor Projects. We have enclosed a file copy with a complete recipient list, location map, and tribal interest response form for each project. As noted, the purposes of the letters are to request participation of regional tribal governments in consultation as required by Section 106 the National Historic Preservation Act.

We look forward to your response. If you have any questions or comments please contact Mr. Michael Vanderhoof, Environmental Program Manager at (720) 963-3013 or Mr. Dan Jepsen, Colorado Department of Transportation at (303) 757-9631.

Sincerely yours,

Michael A. Condit
for Douglas Bennett
Acting Division Engineer

Enclosures

cc: Ms. Jean Wallace, FHWA
Ms. Chis Horn, FHWA
Mr. Dave Beckhouse, FTA
Mr. Daniel Jepsen, COOT Env. Programs
Ms. Carol Parr, CDOT Region 4 Env.
Ms. Gina McAfee, CH
Ms. Sharon Lipp, CDOT Region 6





U.S. Department
Of Transportation
Federal Highway
Administration

Colorado Federal Aid Division
12300 W. Dakota Ave., Ste. 180
Lakewood, CO 80228-1040

July 23, 2004

File: 14276, 13599

Mr. Gordon Yellowman
NHPA/Transportation Planner
Cheyenne and Arapahoe Tribes of Oklahoma
Roads Construction Program
P.O. Box 137
Concho, OK 73724

Subject: Request for Section 106 Consultation, North I-25
Front Range Environmental Impact Statement, Adams,
Boulder, Broomfield, Denver, Jefferson, Larimer and
Weld Counties, Colorado

Request for Section 106 Consultation, Interstate 70
East Corridor Environmental Impact Statement,
Adams, Arapahoe and Denver Counties, Colorado

Dear Mr. Yellowman:

Thank you for your request for a copy of the April 20, 2004 consultation letters for our North I-25 Front Range, and I 70 East Corridor Projects. We have enclosed a file copy with a complete recipient list, location map, and tribal interest response form for each project. As noted, the purposes of the letters are to request participation of regional tribal governments in consultation as required by Section 106 the National Historic Preservation Act.

We look forward to your response. If you have any questions or comments please contact Mr. Michael Vanderhoof, Environmental Program Manager at (720) 963-3013 or Mr. Dan Jepson, Colorado Department of Transportation at (303) 757-9631.

Sincerely yours,

for Douglas Bennett
Acting Division Engineer

Enclosures

cc: Ms. Jean Wallace, FHWA
Mr. Chris Horn, FHWA
Mr. Dave Beckhouse, FTA
Mr. Daniel Jepson, CDOT Env. Programs
Ms. Carol Parr, CDOT Region 4 Env.
Ms. Gina McAfee, C-B
Ms. Sharon Linn, CDOT Region 6





U.S. Department
Of Transportation
Federal Highway
Administration

Colorado Federal Aid Division
12300 W. Dakota Ave., Ste. 180
Lakewood, CO 80228-1040

July 23, 2004

File: 14276, 13599

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

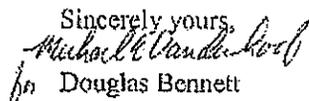
Subject: Request for Section 106 Consultation, North I-25
Front Range Environmental Impact Statement, Adams,
Boulder, Broomfield, Denver, Jefferson, Larimer and
Weld Counties, Colorado

Request for Section 106 Consultation, Interstate 70
East Corridor Environmental Impact Statement,
Adams, Arapahoe and Denver Counties, Colorado

Dear Mr. Pedro:

Thank you for your request for a copy of the April 20, 2004 consultation letters for our North I-25 Front Range, and I 70 East Corridor Projects. We have enclosed a file copy with a complete recipient list, location map, and tribal interest response form for each project. As noted, the purposes of the letters are to request participation of regional tribal governments in consultation as required by Section 106 the National Historic Preservation Act.

We look forward to your response. If you have any questions or comments please contact Mr. Michael Vanderhoof, Environmental Program Manager at (720) 963-3013 or Mr. Dan Jepson, Colorado Department of Transportation at (303) 757-9631.

Sincerely yours,

for Douglas Bennett
Acting Division Engineer

Enclosures

cc: Ms. Jean Wallace, FHWA
Mr. Chris Horn, FHWA
Mr. Dave Beckhouse, FTA
Mr. Daniel Jepson, CDOT Env. Programs
Ms. Carol Parr, CDOT Region 4 Env.
Ms. Gina McAfee, C-B
Ms. Sharon Lipp, CDOT Region 6



AUG-20-2004 10:20

FROM-CDOT ENVIRONMENTAL PROGRAMS

#3037579445

T-45 P.002/003 F-455

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

PROJECT: North I-25 Front Range Environmental Impact Statement

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

Signed: [Signature] T.H.P.O.

Name and Title

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

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

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

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

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

Yes No If yes, please explain.

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

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

Yes No If yes, please explain. *We would like to see the area of development - If we see any Cherokee T.C.P.'s or burial sites - we'll let you know and the sites should remain confidential -*

Please complete and return this form within 60 days via US Mail or fax to:

Dan Jepson, Section 106 Native American Liaison
Colorado Department of Transportation
Environmental Programs Branch
4201 E. Arkansas Ave.
Denver, CO 80222
FAX: (303)757-9445

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

PROJECT: North I-25 Front Range Environmental Impact Statement

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

Signed: Alice Alexander Pawnee Nation THPO
Name and Title

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

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

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

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

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

Yes No If yes, please explain. Possible site just north of Livermore ^{Lamar}land Co.
5.WL 2615 is located in Weld County. Oral History says we traveled this area.

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

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

Yes No If yes, please explain.

Please complete and return this form within 60 days via US Mail or fax to:

Dan Jepson, Section 106 Native American Liaison
Colorado Department of Transportation
Environmental Programs Branch
4201 E. Arkansas Ave.
Denver, CO 80222
FAX: (303)757-9445

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

PROJECT: North I-25 Front Range Environmental Impact Statement

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

Signed: NEIL B. CLOUD-NAGIPA COOK
Name and Title

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

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

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

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

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

Yes No If yes, please explain.

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

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

Yes No If yes, please explain.
IF YOU DIG IN CERTAIN AREAS YOU INADVERTENTLY DISCOVER HUMAN REMAINS.

Please complete and return this form within 60 days via US Mail or fax to:

Dan Jepson, Section 106 Native American Liaison
Colorado Department of Transportation
Environmental Programs Branch
4201 E. Arkansas Ave.
Denver, CO 80222
FAX: (303)757-9445

STATE OF COLORADO

DEPARTMENT OF TRANSPORTATION

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



January 29, 2007

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

SUBJECT: Area of Potential Effects Boundary for the I-25 North Environmental Impact Statement

Dear Ms. Contiguglia:

This letter and the attached documentation constitute the Colorado Department of Transportation's (CDOT) request for your review of the Area of Potential Effects (APE) associated with the project referenced above. The undertaking proposes to improve I-25 and associated transportation corridors between the Denver metropolitan area north to the Fort Collins/Wellington vicinity. Recent commercial and residential development has resulted in increased traffic volume on the interstate and parallel roadways regionally, which requires a broad, comprehensive plan for transportation improvements system-wide. The Draft Environmental Impact Statement for the project is presently planned to be ready for public review in mid-2007.

Area of Projected Effects (APE) Boundaries and Methodology

The Area of Potential Effects (APE) for this project was discussed with your staff at several meetings in early 2006 and further evaluated during a field trip with staff from your office and CDOT personnel on June 15, 2006. Specific APE boundaries have been defined for the three proposed transportation improvements under evaluation: the North I-25 corridor, a commuter rail corridor, and queue jumps for bus rapid transit along US Highways 34 and 85, and State Highway 68. (A queue jump is a lane created through new pavement or re-striping the existing roadway that allows transit vehicles such as buses to get around automobiles stopped at a traffic light.)

North I-25 Corridor

The APE for the North I-25 Corridor extends along I-25 from 84th Ave. in Thornton to State Highway 1 in Wellington. The APE includes the area within the maximum area of disturbance for the project, which is generally the existing ROW plus portions of adjacent properties. In instances where there is an older structure exhibiting architectural integrity outside of the maximum area of disturbance, but within an approximate 150 ft. buffer, that property was also included within the APE.

Commuter Rail Corridor

The APE for the Commuter Rail Corridor extends along the existing BNSF railroad tracks from Fort Collins to Longmont. From Longmont, it follows the new Longmont North Metro alignment eastward along the north side of Hwy 119 to Weld County Road 7, where it continues on the west side of Weld County Road 7 in a southward direction for about seven miles until it intersects with the existing

abandoned Union Pacific Railroad tracks near Erie. The APE includes the existing railroad tracks and ROW along the existing BNSF tracks. There are several areas along the BNSF alignment where curves will be slightly realigned. In those areas the APE includes the adjoining parcels. From Longmont to the south and east, the APE includes the parcels within a 300-ft. corridor along the proposed new alignment.

Queue Jumps – Bus Rapid Transit

The APE for the queue jump improvements occur along three highways: US 85 from Platteville through Evans; US 34 from SH 257 to US 85; and SH 68 between I-25 and US 287. The APE includes the area within the maximum area of disturbance. As with the North I-25 corridor, in instances where there is an older structure exhibiting architectural integrity beyond the maximum area of disturbance, but within an approximate 150 ft. buffer, that property was also included within the APE. There are proposed queue jumps to accommodate the commuter bus on US 85, and on US 34 to accommodate Bus Rapid Transit. Most of these queue jumps will be improvements within the existing right-of-way. For improvements associated with queue jumps outside the existing right-of-way, we will include the adjacent first-tier properties.

We request your review of and agreement with the APE boundary(ies) as discussed above and represented on the enclosed maps. Your response is necessary for CDOT's and FHWA's compliance with Section 106 of the National Historic Preservation Act, and 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 CDOT Acting Staff Historian Robert Autobee at (303) 757-9758.

Very truly yours,



Brad Beckham, Manager
Environmental Programs Branch

Enclosure: APE maps

cc: Carol Parr, CDOT Region 4
Gina McAfee, Carter & Burgess
Melinda Castillo, FHWA
File/CF

STATE OF COLORADO

DEPARTMENT OF TRANSPORTATION

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



March 12, 2007

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

SUBJECT: Additional Information on the Area of Potential Effects, North I-25 Environmental Impact Statement (CHS #42346)

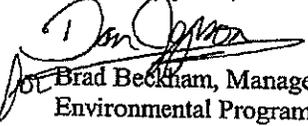
Dear Ms. Contiguglia:

Your letter of February 16, 2007, regarding the Area of Potential Effects (APE) for the project referenced above expressed concerns regarding the commuter rail corridor within the APE. By way of clarification, the APE for the commuter rail corridor extends along the Burlington Northern Santa Fe (BNSF) Railroad from Fort Collins to Longmont. From Longmont, the APE follows the new Longmont-North Metro Alignment eastward along the north side of State Highway 119 to Weld County Road 7 (refer to the enclosed map book pages A-22, A-23 and B-27), where it continues to the Westside of Weld County Road 7 to the south for about seven miles (see map book pages B-27 through B-31), until it intersects with the existing abandoned Union Pacific (UP) railroad tracks near Erie.

You also inquired if the effects determination took into account potential noise and vibration issues addressed in the APE. In June 2006, representatives from your office and CDOT held a field meeting to discuss the commuter rail APE. Both parties agreed that the commuter rail APE would include the existing railroad itself where the proposed improvements were on existing alignment. Where the track was proposed to be realigned, the APE would include adjacent properties. In those locations where the commuter rail would be on a new alignment (i.e., the Longmont-North Metro Connection), the APE includes parcels within a 300-foot corridor along the proposed new alignment, which will include potential noise and vibration effects. A 1:800 scale map is enclosed that better defines the North I-25 APE boundary to aid in your review.

We request your comment on and agreement with the APE boundary as discussed above and represented on the enclosed maps. Thank you in advance for your prompt attention to this matter. If you require additional information, please contact CDOT Assistant Staff Historian Robert Autobee at (303) 757-9758.

Very truly yours,


Brad Beckham, Manager
Environmental Programs Branch

Enclosure: APE maps

cc: Carol Parr, CDOT Region 4
Gina McAfee, Carter & Burgess
Melinda Castillo, FHWA
File/CF

STATE OF COLORADO

DEPARTMENT OF TRANSPORTATION

Environmental Programs Branch
Shumate Building
4201 East Arkansas Avenue
Denver, Colorado 80222
(303) 757-9259



May 1, 2007

Tom Vaughn, Museum Director
Berthoud Historic Preservation Commission
P. O. Box 225
Berthoud, CO 80513

SUBJECT: Section 106 Historic Properties Consultation, North Interstate 25 Environmental Assessment

Dear Mr. Vaughn:

The Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA), in cooperation with the Colorado Department of Transportation (CDOT), have initiated preparation of an Environmental Impact Statement (EIS) to identify and evaluate multi-modal transportation improvements along approximately 70 miles of the I-25 corridor from the Fort Collins-Wellington area to Denver. The EIS will address regional and inter-regional movement of people, goods and services in the I-25 corridor.

This project is an undertaking subject to compliance with Section 106 of the National Historic Preservation Act, as amended (Section 106, 16 U.S.C. 470f) and its implementing regulations (36 CFR 800). We are currently seeking the assistance of local communities and historic preservation organizations in the identification of historic properties, and to help identify issues that may relate to the undertaking's potential effects on historic properties. Toward that end, FHWA, FTA and CDOT would like to formally offer the Berthoud Historic Preservation Commission the opportunity to participate as a consulting party for the Section 106 compliance process, as provided in Section 800.3(f)(1) of the regulation.

Historic Properties Identification and Area of Potential Effects

As part of our survey of the project area, we are identifying previously unrecorded historic properties in the Area of Potential Effects (APE), as well as known properties. Specific APE boundaries have been defined for the three proposed transportation improvements under evaluation: the North I-25 corridor, a commuter rail corridor, and queue jumps for bus rapid transit along US Highways 34 and 85. (A queue jump is a lane created through new pavement or re-striping the existing roadway that allows transit vehicles such as buses to get around automobiles stopped at a traffic light.) All of these APE boundaries are located within the larger regional study area on the enclosed map. We have provided brief descriptions of the different APE Corridors below:

North I-25 Corridor

The APE for the North I-25 Corridor extends along I-25 from 84th Avenue to Thornton to State Highway 1 in Wellington. The APE includes the area within the maximum area of disturbance for the project, which is generally the existing ROW plus portions of adjacent properties. In instances where there is an older structure exhibiting architectural integrity outside the maximum area of disturbance, but within an approximate 150-foot buffer, that property was also included within the APE.

Commuter Rail Corridor

The APE for the Commuter Rail Corridor extends along the existing BNSF railroad tracks from Fort Collins to Longmont. From Longmont, it follows the new Longmont North Metro alignment eastward along the north side of State Highway 119 to Weld County Road 7, where it continues on the west side of Weld County Road 7 in a southward direction for about seven miles until it intersects with the existing abandoned Union Pacific Railroad tracks near Erie. The APE includes the existing railroad tracks and ROW along the existing BNSF tracks. There are several areas along the BNSF alignment where curves will be slightly realigned. In those areas the APE includes the adjoining parcels. From Longmont to the south and east, the APE includes the parcels within a 300-foot corridor along the proposed new alignment.

Queue Jumps – Bus Rapid Transit

The APE for the queue jump improvements occur along three highways: US 85 from Platteville through Evans and US 34 from SH 257 to US 85. The APE includes the area within the maximum area of disturbance. As with the North I-25 corridor, in instances where there is an older structure exhibiting architectural integrity beyond the maximum area of disturbance, but within an approximate 150-foot buffer, that property was also included within the APE. There are proposed queue jumps to accommodate the commuter bus on US 85, and on US 34 to accommodate Bus Rapid Transit. Most of these queue jumps will be improvements within the existing right-of-way. For improvements associated with queue jumps outside the existing right-of-way, we will include the adjacent first-tier properties.

APE Maps

For detailed maps of the APE, please refer to the following FTP site: <ftp://ftp.cdot.com/Projects/North%20I-25/> To access the file, follow the directions below:

- 1) Go to "File"
- 2) Click "Log-in As"... (using your Internet browser's File menu)
- 3) Enter Username: NorthI25FTP
- 4) Enter Username: b5adr5we

A single pdf file will appear. This is a large file containing numerous aerial maps, so it will take several minutes for this file to download so please be patient.

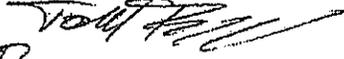
Section 106 Consultation

We are contacting local historical organizations to help identify any historic buildings, districts, sites, objects, or archaeological sites of significance within the APE. Additionally, we are conducting research on properties not previously evaluated for the National Register of Historic Places (NRHP) within the project area to determine their architectural and historical significance. Our assessment of significance will be based on the established NRHP eligibility criteria. Any information you can provide will help ensure that important historical resources are considered and protected.

If you are interested in participating as a consulting party for this project under the Section 106 guidelines, please respond in writing within 30 days of receipt of this letter to Lisa Schoch, CDOT Senior Staff Historian, at the address on the letterhead. We request that your response include a statement of demonstrated interest in historic properties associated with this project, as stipulated in the Section 106 regulation. If you require additional information or have any questions about the Section 106 process, please contact Ms. Schoch at (303)512-4258.

Mr. Vaughn
May 1, 2007
Page 3

Very truly yours,



FB
Brad Beckham, Manager
Environmental Programs Branch

Enclosure: Map of Study Area

cc: Carol Parr, CDOT Region 4
Melinda Urban, FHWA
Wendy Wallach, Carter Burgess
Carol Legard, ACHP
Georgianna Contiguglia, Colorado SFPO
R/CF

STATE OF COLORADO

DEPARTMENT OF TRANSPORTATION

Environmental Programs Branch
Shumate Building
4201 East Arkansas Avenue
Denver, Colorado 80222
(303) 757-9259



May 1, 2007

Jim Sidebottom
Fort Lupton Historic Preservation Board
130 S. McKinley St.
Fort Lupton, CO 80621

SUBJECT: Section 106 Historic Properties Consultation, North Interstate 25 Environmental Assessment

Dear Mr. Sidebottom:

The Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA), in cooperation with the Colorado Department of Transportation (CDOT), have initiated preparation of an Environmental Impact Statement (EIS) to identify and evaluate multi-modal transportation improvements along approximately 70 miles of the I-25 corridor from the Fort Collins-Wellington area to Denver. The EIS will address regional and inter-regional movement of people, goods and services in the I-25 corridor.

This project is an undertaking subject to compliance with Section 106 of the National Historic Preservation Act, as amended (Section 106, 16 U.S.C. 470f) and its implementing regulations (36 CFR 800). We are currently seeking the assistance of local communities and historic preservation organizations in the identification of historic properties, and to help identify issues that may relate to the undertaking's potential effects on historic properties. Toward that end, FHWA, FTA and CDOT would like to formally offer the Fort Lupton Historic Preservation Board the opportunity to participate as a consulting party for the Section 106 compliance process, as provided in Section 800.3(f)(1) of the regulation.

Historic Properties Identification and Area of Potential Effects

As part of our survey of the project area, we are identifying previously unrecorded historic properties in the Area of Potential Effects (APE), as well as known properties. Specific APE boundaries have been defined for the three proposed transportation improvements under evaluation: the North I-25 corridor, a commuter rail corridor, and queue jumps for bus rapid transit along US Highways 34 and 85. (A queue jump is a lane created through new pavement or re-striping the existing roadway that allows transit vehicles such as buses to get around automobiles stopped at a traffic light.) All of these APE boundaries are located within the larger regional study area on the enclosed map. We have provided brief descriptions of the different APE Corridors below:

North I-25 Corridor

The APE for the North I-25 Corridor extends along I-25 from 84th Avenue to Thornton to State Highway 1 in Wellington. The APE includes the area within the maximum area of disturbance for the project, which is generally the existing ROW plus portions of adjacent properties. In instances where there is an older structure exhibiting architectural integrity outside the maximum area of disturbance, but within an approximate 150-foot buffer, that property was also included within the APE.

STATE OF COLORADO

DEPARTMENT OF TRANSPORTATION

Environmental Programs Branch
Shumate Building
4201 East Arkansas Avenue
Denver, Colorado 80222
(303) 757-9259



May 1, 2007

Karen McWilliams
Fort Collins Landmark Preservation Commission
Fort Collins Advance Planning Dept.
281 N. College Ave.
Fort Collins, CO 80524

SUBJECT: Section 106 Historic Properties Consultation, North Interstate 25 Environmental Assessment

Dear Ms. McWilliams:

The Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA), in cooperation with the Colorado Department of Transportation (CDOT), have initiated preparation of an Environmental Impact Statement (EIS) to identify and evaluate multi-modal transportation improvements along approximately 70 miles of the I-25 corridor from the Fort Collins-Wellington area to Denver. The EIS will address regional and inter-regional movement of people, goods and services in the I-25 corridor.

This project is an undertaking subject to compliance with Section 106 of the National Historic Preservation Act, as amended (Section 106, 16 U.S.C. 470f) and its implementing regulations (36 CFR 800). We are currently seeking the assistance of local communities and historic preservation organizations in the identification of historic properties, and to help identify issues that may relate to the undertaking's potential effects on historic properties. Toward that end, FHWA, FTA and CDOT would like to formally offer the Fort Collins Landmark Preservation Commission the opportunity to participate as a consulting party for the Section 106 compliance process, as provided in Section 800.3(f)(1) of the regulation.

Historic Properties Identification and Area of Potential Effects

As part of our survey of the project area, we are identifying previously unrecorded historic properties in the Area of Potential Effects (APE), as well as known properties. Specific APE boundaries have been defined for the three proposed transportation improvements under evaluation: the North I-25 corridor, a commuter rail corridor, and queue jumps for bus rapid transit along US Highways 34 and 85. (A queue jump is a lane created through new pavement or re-striping the existing roadway that allows transit vehicles such as buses to get around automobiles stopped at a traffic light.) All of these APE boundaries are located within the larger regional study area on the enclosed map. We have provided brief descriptions of the different APE Corridors below:

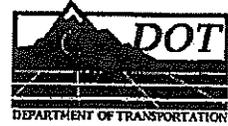
North I-25 Corridor

The APE for the North I-25 Corridor extends along I-25 from 84th Avenue to Thornton to State Highway 1 in Wellington. The APE includes the area within the maximum area of disturbance for the project, which is generally the existing ROW plus portions of adjacent properties. In instances where there is an

STATE OF COLORADO

DEPARTMENT OF TRANSPORTATION

Environmental Programs Branch
Shumate Building
4201 East Arkansas Avenue
Denver, Colorado 80222
(303) 757-9259



May 1, 2007

Mark Rodman
Colorado Preservation, Inc.
333 W. Colfax Avenue, Suite 300
Denver, CO 80204

SUBJECT: Section 106 Historic Properties Consultation, North Interstate 25 Environmental Assessment

Dear Mr. Rodman:

The Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA), in cooperation with the Colorado Department of Transportation (CDOT), have initiated preparation of an Environmental Impact Statement (EIS) to identify and evaluate multi-modal transportation improvements along approximately 70 miles of the I-25 corridor from the Fort Collins-Wellington area to Denver. The EIS will address regional and inter-regional movement of people, goods and services in the I-25 corridor.

This project is an undertaking subject to compliance with Section 106 of the National Historic Preservation Act, as amended (Section 106, 16 U.S.C. 470f) and its implementing regulations (36 CFR 800). We are currently seeking the assistance of local communities and historic preservation organizations in the identification of historic properties, and to help identify issues that may relate to the undertaking's potential effects on historic properties. Toward that end, FHWA, FTA and CDOT would like to formally offer Colorado Preservation Incorporated the opportunity to participate as a consulting party for the Section 106 compliance process, as provided in Section 800.3(f)(1) of the regulation.

Historic Properties Identification and Area of Potential Effects

As part of our survey of the project area, we are identifying previously unrecorded historic properties in the Area of Potential Effects (APE), as well as known properties. Specific APE boundaries have been defined for the three proposed transportation improvements under evaluation: the North I-25 corridor, a commuter rail corridor, and queue jumps for bus rapid transit along US Highways 34 and 85. (A queue jump is a lane created through new pavement or re-striping the existing roadway that allows transit vehicles such as buses to get around automobiles stopped at a traffic light.) All of these APE boundaries are located within the larger regional study area on the enclosed map. We have provided brief descriptions of the different APE Corridors below:

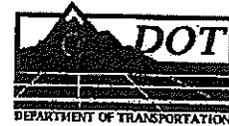
North I-25 Corridor

The APE for the North I-25 Corridor extends along I-25 from 84th Avenue to Thornton to State Highway 1 in Wellington. The APE includes the area within the maximum area of disturbance for the project, which is generally the existing ROW plus portions of adjacent properties. In instances where there is an older structure exhibiting architectural integrity outside the maximum area of disturbance, but within an approximate 150-foot buffer, that property was also included within the APE.

STATE OF COLORADO

DEPARTMENT OF TRANSPORTATION

Environmental Programs Branch
Shumate Building
4201 East Arkansas Avenue
Denver, Colorado 80222
(303) 757-9259



May 1, 2007

Tonya Haas
Broomfield Historic Landmark Board
1 Descombes Drive
Broomfield, CO 80020

SUBJECT: Section 106 Historic Properties Consultation, North Interstate 25 Environmental Assessment

Dear Mr. Vaughn:

The Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA), in cooperation with the Colorado Department of Transportation (CDOT), have initiated preparation of an Environmental Impact Statement (EIS) to identify and evaluate multi-modal transportation improvements along approximately 70 miles of the I-25 corridor from the Fort Collins-Wellington area to Denver. The EIS will address regional and inter-regional movement of people, goods and services in the I-25 corridor.

This project is an undertaking subject to compliance with Section 106 of the National Historic Preservation Act, as amended (Section 106, 16 U.S.C. 470f) and its implementing regulations (36 CFR 800). We are currently seeking the assistance of local communities and historic preservation organizations in the identification of historic properties, and to help identify issues that may relate to the undertaking's potential effects on historic properties. Toward that end, FHWA, FTA and CDOT would like to formally offer the Broomfield Historic Landmark Board the opportunity to participate as a consulting party for the Section 106 compliance process, as provided in Section 800.3(f)(1) of the regulation.

Historic Properties Identification and Area of Potential Effects

As part of our survey of the project area, we are identifying previously unrecorded historic properties in the Area of Potential Effects (APE), as well as known properties. Specific APE boundaries have been defined for the three proposed transportation improvements under evaluation: the North I-25 corridor, a commuter rail corridor, and queue jumps for bus rapid transit along US Highways 34 and 85. (A queue jump is a lane created through new pavement or re-striping the existing roadway that allows transit vehicles such as buses to get around automobiles stopped at a traffic light.) All of these APE boundaries are located within the larger regional study area on the enclosed map. We have provided brief descriptions of the different APE Corridors below:

North I-25 Corridor

The APE for the North I-25 Corridor extends along I-25 from 84th Avenue to Thornton to State Highway 1 in Wellington. The APE includes the area within the maximum area of disturbance for the project, which is generally the existing ROW plus portions of adjacent properties. In instances where there is an older structure exhibiting architectural integrity outside the maximum area of disturbance, but within an approximate 150-foot buffer, that property was also included within the APE.

STATE OF COLORADO

DEPARTMENT OF TRANSPORTATION

Environmental Programs Branch
Shumate Building
4201 East Arkansas Avenue
Denver, Colorado 80222
(303) 757-9259



May 1, 2007

Mark Heidt
Brighton Historic Preservation Commission
22 South 4th Avenue, #102
Brighton, CO 80601

SUBJECT: Section 106 Historic Properties Consultation, North Interstate 25 Environmental Assessment

Dear Mr. Heidt:

The Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA), in cooperation with the Colorado Department of Transportation (CDOT), have initiated preparation of an Environmental Impact Statement (EIS) to identify and evaluate multi-modal transportation improvements along approximately 70 miles of the I-25 corridor from the Fort Collins-Wellington area to Denver. The EIS will address regional and inter-regional movement of people, goods and services in the I-25 corridor.

This project is an undertaking subject to compliance with Section 106 of the National Historic Preservation Act, as amended (Section 106, 16 U.S.C. 470f) and its implementing regulations (36 CFR 800). We are currently seeking the assistance of local communities and historic preservation organizations in the identification of historic properties, and to help identify issues that may relate to the undertaking's potential effects on historic properties. Toward that end, FHWA, FTA and CDOT would like to formally offer the Brighton Historic Preservation Commission the opportunity to participate as a consulting party for the Section 106 compliance process, as provided in Section 800.3(f)(1) of the regulation.

Historic Properties Identification and Area of Potential Effects

As part of our survey of the project area, we are identifying previously unrecorded historic properties in the Area of Potential Effects (APE), as well as known properties. Specific APE boundaries have been defined for the three proposed transportation improvements under evaluation: the North I-25 corridor, a commuter rail corridor, and queue jumps for bus rapid transit along US Highways 34 and 85. (A queue jump is a lane created through new pavement or re-striping the existing roadway that allows transit vehicles such as buses to get around automobiles stopped at a traffic light.) All of these APE boundaries are located within the larger regional study area on the enclosed map. We have provided brief descriptions of the different APE Corridors below:

North I-25 Corridor

The APE for the North I-25 Corridor extends along I-25 from 84th Avenue to Thornton to State Highway 1 in Wellington. The APE includes the area within the maximum area of disturbance for the project, which is generally the existing ROW plus portions of adjacent properties. In instances where there is an older structure exhibiting architectural integrity outside the maximum area of disturbance, but within an approximate 150-foot buffer, that property was also included within the APE.

STATE OF COLORADO

DEPARTMENT OF TRANSPORTATION

Environmental Programs Branch
Shumate Building
4201 East Arkansas Avenue
Denver, Colorado 80222
(303) 757-9259



May 1, 2007

Ms. Barbara Pahl
National Trust for Historic Preservation
Mountains/Plains Office
535 16th Street, Suite 750
Denver, CO 80202

SUBJECT: Section 106 Historic Properties Consultation, North Interstate 25 Environmental Assessment

Dear Ms. Pahl:

The Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA), in cooperation with the Colorado Department of Transportation (CDOT), have initiated preparation of an Environmental Impact Statement (EIS) to identify and evaluate multi-modal transportation improvements along approximately 70 miles of the I-25 corridor from the Fort Collins-Wellington area to Denver. The EIS will address regional and inter-regional movement of people, goods and services in the I-25 corridor.

This project is an undertaking subject to compliance with Section 106 of the National Historic Preservation Act, as amended (Section 106, 16 U.S.C. 470f) and its implementing regulations (36 CFR 800). We are currently seeking the assistance of local communities and historic preservation organizations in the identification of historic properties, and to help identify issues that may relate to the undertaking's potential effects on historic properties. Toward that end, FHWA, FTA and CDOT would like to formally offer the National Trust for Historic Preservation the opportunity to participate as a consulting party for the Section 106 compliance process, as provided in Section 800.3(f)(1) of the regulation.

Historic Properties Identification and Area of Potential Effects

As part of our survey of the project area, we are identifying previously unrecorded historic properties in the Area of Potential Effects (APE), as well as known properties. Specific APE boundaries have been defined for the three proposed transportation improvements under evaluation: the North I-25 corridor, a commuter rail corridor, and queue jumps for bus rapid transit along US Highways 34 and 85. (A queue jump is a lane created through new pavement or re-striping the existing roadway that allows transit vehicles such as buses to get around automobiles stopped at a traffic light.) All of these APE boundaries are located within the larger regional study area on the enclosed map. We have provided brief descriptions of the different APE Corridors below:

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4201 East Arkansas Avenue
Denver, Colorado 80222
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May 1, 2007

Joseph A. Racine
Timmath Planning Commission
P.O. Box 37
4100 Main Street
Timmath, CO 81435

SUBJECT: Section 106 Historic Properties Consultation, North Interstate 25 Environmental Assessment

Dear Mr. Racine:

The Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA), in cooperation with the Colorado Department of Transportation (CDOT), have initiated preparation of an Environmental Impact Statement (EIS) to identify and evaluate multi-modal transportation improvements along approximately 70 miles of the I-25 corridor from the Fort Collins-Wellington area to Denver. The EIS will address regional and inter-regional movement of people, goods and services in the I-25 corridor.

This project is an undertaking subject to compliance with Section 106 of the National Historic Preservation Act, as amended (Section 106, 16 U.S.C. 470f) and its implementing regulations (36 CFR 800). We are currently seeking the assistance of local communities and historic preservation organizations in the identification of historic properties, and to help identify issues that may relate to the undertaking's potential effects on historic properties. Toward that end, FHWA, FTA and CDOT would like to formally offer the Timmath Planning Commission the opportunity to participate as a consulting party for the Section 106 compliance process, as provided in Section 800.3(f)(1) of the regulation.

Historic Properties Identification and Area of Potential Effects

As part of our survey of the project area, we are identifying previously unrecorded historic properties in the Area of Potential Effects (APE), as well as known properties. Specific APE boundaries have been defined for the three proposed transportation improvements under evaluation: the North I-25 corridor, a commuter rail corridor, and queue jumps for bus rapid transit along US Highways 34 and 85. (A queue jump is a lane created through new pavement or re-striping the existing roadway that allows transit vehicles such as buses to get around automobiles stopped at a traffic light.) All of these APE boundaries are located within the larger regional study area on the enclosed map. We have provided brief descriptions of the different APE Corridors below:

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Shumate Building
4201 East Arkansas Avenue
Denver, Colorado 80222
(303) 757-9259



May 1, 2007

Greg George
Loveland Historic Preservation Commission
500 E. 3rd St.
Loveland, CO 80537

SUBJECT: Section 106 Historic Properties Consultation, North Interstate 25 Environmental Assessment

Dear Mr. George:

The Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA), in cooperation with the Colorado Department of Transportation (CDOT), have initiated preparation of an Environmental Impact Statement (EIS) to identify and evaluate multi-modal transportation improvements along approximately 70 miles of the I-25 corridor from the Fort Collins-Wellington area to Denver. The EIS will address regional and inter-regional movement of people, goods and services in the I-25 corridor.

This project is an undertaking subject to compliance with Section 106 of the National Historic Preservation Act, as amended (Section 106, 16 U.S.C. 470f) and its implementing regulations (36 CFR 800). We are currently seeking the assistance of local communities and historic preservation organizations in the identification of historic properties, and to help identify issues that may relate to the undertaking's potential effects on historic properties. Toward that end, FHWA, FTA and CDOT would like to formally offer the Loveland Historic Preservation Commission the opportunity to participate as a consulting party for the Section 106 compliance process, as provided in Section 800.3(f)(1) of the regulation.

Historic Properties Identification and Area of Potential Effects

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Environmental Programs Branch
Shumate Building
4201 East Arkansas Avenue
Denver, Colorado 80222
(303) 757-9259



May 1, 2007

Ryan Kragerud
Longmont Historic Preservation Commission
Longmont Planning Office
350 Kimbark St.
Longmont, CO 80501

SUBJECT: Section 106 Historic Properties Consultation, North Interstate 25 Environmental Assessment

Dear Mr. Kragerud:

The Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA), in cooperation with the Colorado Department of Transportation (CDOT), have initiated preparation of an Environmental Impact Statement (EIS) to identify and evaluate multi-modal transportation improvements along approximately 70 miles of the I-25 corridor from the Fort Collins-Wellington area to Denver. The EIS will address regional and inter-regional movement of people, goods and services in the I-25 corridor.

This project is an undertaking subject to compliance with Section 106 of the National Historic Preservation Act, as amended (Section 106, 16 U.S.C. 470f) and its implementing regulations (36 CFR 800). We are currently seeking the assistance of local communities and historic preservation organizations in the identification of historic properties, and to help identify issues that may relate to the undertaking's potential effects on historic properties. Toward that end, FHWA, FTA and CDOT would like to formally offer the Longmont Historic Preservation Commission the opportunity to participate as a consulting party for the Section 106 compliance process, as provided in Section 800.3(f)(1) of the regulation.

Historic Properties Identification and Area of Potential Effects

As part of our survey of the project area, we are identifying previously unrecorded historic properties in the Area of Potential Effects (APE), as well as known properties. Specific APE boundaries have been defined for the three proposed transportation improvements under evaluation: the North I-25 corridor, a commuter rail corridor, and queue jumps for bus rapid transit along US Highways 34 and 85. (A queue jump is a lane created through new pavement or re-striping the existing roadway that allows transit vehicles such as buses to get around automobiles stopped at a traffic light.) All of these APE boundaries are located within the larger regional study area on the enclosed map. We have provided brief descriptions of the different APE Corridors below:

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Denver, Colorado 80222
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May 1, 2007

Betsy Kellums
Greeley Historic Preservation Commission
City of Greeley Museums
714 8th Street
Greeley, CO 80631

SUBJECT: Section 106 Historic Properties Consultation, North Interstate 25 Environmental Assessment

Dear Ms. Kellums:

The Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA), in cooperation with the Colorado Department of Transportation (CDOT), have initiated preparation of an Environmental Impact Statement (EIS) to identify and evaluate multi-modal transportation improvements along approximately 70 miles of the I-25 corridor from the Fort Collins-Wellington area to Denver. The EIS will address regional and inter-regional movement of people, goods and services in the I-25 corridor.

This project is an undertaking subject to compliance with Section 106 of the National Historic Preservation Act, as amended (Section 106, 16 U.S.C. 470f) and its implementing regulations (36 CFR 800). We are currently seeking the assistance of local communities and historic preservation organizations in the identification of historic properties, and to help identify issues that may relate to the undertaking's potential effects on historic properties. Toward that end, FHWA, FTA and CDOT would like to formally offer the Greeley Historic Preservation Commission the opportunity to participate as a consulting party for the Section 106 compliance process, as provided in Section 800.3(f)(1) of the regulation.

Historic Properties Identification and Area of Potential Effects

As part of our survey of the project area, we are identifying previously unrecorded historic properties in the Area of Potential Effects (APE), as well as known properties. Specific APE boundaries have been defined for the three proposed transportation improvements under evaluation: the North I-25 corridor, a commuter rail corridor, and queue jumps for bus rapid transit along US Highways 34 and 85. (A queue jump is a lane created through new pavement or re-striping the existing roadway that allows transit vehicles such as buses to get around automobiles stopped at a traffic light.) All of these APE boundaries are located within the larger regional study area on the enclosed map. We have provided brief descriptions of the different APE Corridors below:

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Environmental Programs Branch
Shumate Building
4201 East Arkansas Avenue
Denver, Colorado 80222
(303) 757-9259



May 22, 2007

Ms. Celeste Flores
Historic Preservation Commission
City of Northglenn
11701 Community Center Drive
Northglenn, CO 80233

SUBJECT: Section 106 Historic Properties Consultation, North Interstate 25 Environmental Assessment

Dear Ms. Grimm:

The Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA), in cooperation with the Colorado Department of Transportation (CDOT), have initiated preparation of an Environmental Impact Statement (EIS) to identify and evaluate multi-modal transportation improvements along approximately 70 miles of the I-25 corridor from the Fort Collins-Wellington area to Denver. The EIS will address regional and inter-regional movement of people, goods and services in the I-25 corridor.

This project is an undertaking subject to compliance with Section 106 of the National Historic Preservation Act, as amended (Section 106, 16 U.S.C. 470f) and its implementing regulations (36 CFR 800). We are currently seeking the assistance of local communities and historic preservation organizations in the identification of historic properties, and to help identify issues that may relate to the undertaking's potential effects on historic properties. Toward that end, FHWA, FTA and CDOT would like to formally offer the Northglenn Historic Preservation Commission the opportunity to participate as a consulting party for the Section 106 compliance process, as provided in Section 800.3(f)(1) of the regulation.

Historic Properties Identification and Area of Potential Effects

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Environmental Programs Branch
Shumate Building
4201 East Arkansas Avenue
Denver, Colorado 80222
(303) 757-9259



May 1, 2007

Denise Grimm
Boulder County Historic Preservation Advisory Board
Boulder County Land Use Dept.
P. O. Box 471
Boulder, CO 80306

SUBJECT: Section 106 Historic Properties Consultation, North Interstate 25 Environmental Assessment

Dear Ms. Grimm:

The Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA), in cooperation with the Colorado Department of Transportation (CDOT), have initiated preparation of an Environmental Impact Statement (EIS) to identify and evaluate multi-modal transportation improvements along approximately 70 miles of the I-25 corridor from the Fort Collins-Wellington area to Denver. The EIS will address regional and inter-regional movement of people, goods and services in the I-25 corridor.

This project is an undertaking subject to compliance with Section 106 of the National Historic Preservation Act, as amended (Section 106, 16 U.S.C. 470f) and its implementing regulations (36 CFR 800). We are currently seeking the assistance of local communities and historic preservation organizations in the identification of historic properties, and to help identify issues that may relate to the undertaking's potential effects on historic properties. Toward that end, FHWA, FTA and CDOT would like to formally offer the Boulder County Historic Preservation Advisory Board the opportunity to participate as a consulting party for the Section 106 compliance process, as provided in Section 800.3(f)(1) of the regulation.

Historic Properties Identification and Area of Potential Effects

As part of our survey of the project area, we are identifying previously unrecorded historic properties in the Area of Potential Effects (APE), as well as known properties. Specific APE boundaries have been defined for the three proposed transportation improvements under evaluation: the North I-25 corridor, a commuter rail corridor, and queue jumps for bus rapid transit along US Highways 34 and 85. (A queue jump is a lane created through new pavement or re-striping the existing roadway that allows transit vehicles such as buses to get around automobiles stopped at a traffic light.) All of these APE boundaries are located within the larger regional study area on the enclosed map. We have provided brief descriptions of the different APE Corridors below:

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COMMUNITY DEVELOPMENT Historic Preservation

1100 10th Street, Suite 201, Greeley, Colorado 80631
(970) 350-9222 • Fax (970) 350-9895
www.greeleygov.com

May 4, 2007

Lisa Schoch
CDOT Senior Staff Historian
Environmental Programs Branch
Shumate Building
4201 East Arkansas Avenue
Denver, Colorado 80222

Dear Lisa,

We appreciate your letter offering us the opportunity to participate in the North Interstate 25 Environmental Assessment. We are interested in participating as a consulting party and are thankful for the chance to comment.

Please note the Greeley Historic Preservation Office address has changed. The new address is:
1100 10th Street, Ste. 201
Greeley, CO 80631

Please feel free to call me at 350-9222 or e-mail me at betsy.kellums@greeleygov.com if you have any questions. Thank you very much. I really appreciate your help.

Regards,

Betsy Kellums
Historic Preservation Specialist

S E R V I N G O U R C O M M U N I T Y • I T ' S A T R A D I T I O N

We promise to preserve and improve the quality of life for Greeley through timely, courteous and cost effective service.



Performance, Integrity, Teamwork,
Accountability and Service

City of Fort Lupton Planning and Building Department

Tom Parko, Planning Director
130 S. McKinlay Avenue
Fort Lupton, Colorado 80621

(303) 857-6694 x 125
Fax (303) 857-0351
e-mail: tparko@fortlupton.org
<http://www.fortlupton.org>

June 26, 2007

Brad Beckham, Manager
Environmental Programs Branch
Colorado Department of Transportation
Shurnate Building
4201 E Arkansas Ave
Denver, CO 80222

Mr. Beckham:

The Historic Preservation Board for the City of Fort Lupton has reviewed the proposed multi-modal transportation improvements along US Highway 85.

Upon review of the application the Board finds that there are no conflicts with the Fort Lupton Preservation Plan or applicable Municipal Codes with regard to Historic Preservation. The Board would like the Colorado Department of Transportation to be aware that the South Platte Valley Historical Society owns property that serves as a Historic Park and includes several historic structures. The Board requests that access to and from this Park not be hindered by this proposed project.

If you have any questions, do not hesitate to contact me at 303/857-6694 ext. 125 or tparko@fortlupton.org.

Regards,

Tom Parko
Planning Director



August 8, 2007

Brad Beckham, Manager
C-DOT Environmental Programs Branch
4201 East Arkansas Avenue
Shumate Building
Denver, Colorado 80222

SUBJECT: Eligibility Determinations, North I-25 Environmental Impact Statement

Dear Mr. Beckham:

Thank you for the letter requesting comments on the eligibility determinations in the North I-25 EIS. The Greeley Historic Preservation Office reviewed the forms for Greeley properties including: the North Boomerang Extension Ditch 5WL.2049.1, Book Rack Shopping Center 5WL.5214, New Idea Cleaners 5WL.5298, Best in Show Pet Grooming/Checks Cashed 5WL.5299, Rapp's Service Station 5WL.5300, Tortilleria Y Panaderia 5WL.5281, and Precision Welding & Design 5WL.5280 and agrees with the determinations of not eligible for the National Register of Historic Places.

Please contact me at betsy.kellums@greeleygov.com or 970.350.9222 if there is anything I can do to assist with this project.

Sincerely,

A handwritten signature in cursive script that reads "Betsy Kellums".

Betsy Kellums
Historic Preservation Specialist



**COLORADO
HISTORICAL
SOCIETY**

The Colorado History Museum 1300 Broadway Denver, Colorado 80203-2137

August 21, 2007

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

Re: North I-25 Environmental Impact Statement: Determinations of Eligibility. (CHS #42346)

Dear Mr. Beckham,

Thank you for your correspondence dated August 1, 2007 and received by our office on that same date regarding the consultation of the above-mentioned project under Section 106 of the National Historic Preservation Act (Section 106).

After review of the provided information, we have additional questions regarding the resources listed below.

- **SWL.5205.** According to the site form the chimney is located in the center of the roof of the main section. This chimney placement strongly suggests that the house conforms to the saddlebag type, which features a central chimney flanked by rooms. This example appears to feature the central chimney with a hipped with ridge roof. The additions appear to be within the historic period and do not overwhelm the house. In our opinion, the property has the potential of being eligible as a good representative example of a saddlebag type residence.
- **SWL.5201.** We do not concur that this resource is not eligible for the National Register of Historic Places (NRHP). In our opinion, the property is a good representative example of the I-House type featuring the Gothic Revival style. The rear addition does not appear to overwhelm the historic character-defining features of the house. While the agricultural setting has been lost, the historic setting around the house still appears to be intact. Therefore, we feel the property is eligible under National Register Criterion C for architecture.
- **SWL.3146.1.** No official determination has been made by the SHPO for the entire ditch. The submitted site form states that the SHPO officially concurred with a finding of not eligible for the entire ditch in 2001. Item 17 of that form states that the evaluation of the entire ditch is a field determination and not an official SHPO determination. The entire ditch has not been surveyed nor evaluated. The 2001 evaluation was for the segment

only. In addition, only a very small segment of the ditch that traveled under I-25 was evaluated at that time (approximately 8 km). In our opinion, there is not enough information to make a determination of eligibility for the entire ditch. Please provide an evaluation of whether or not the segment supports or does not support the overall eligibility of the ditch.

- **SWL.1974.1.** No official determination has been made by the SHPO for the entire ditch. The submitted site form states that the SHPO officially concurred with a finding of not eligible for the entire ditch in 1993. The entire ditch has not been surveyed nor evaluated. The 1993 evaluation was for the segment only. In addition, only a very small segment of the ditch that traveled under I-25 was evaluated at that time. In our opinion, there is not enough information to make a determination of eligibility for the entire ditch. Please provide an evaluation of whether or not the segment supports or does not support the overall eligibility of the ditch.
- **5LR.11391.** The site form discusses outbuildings, but there are no pictures, sketch map, or detailed narrative descriptions of the outbuildings. Because it is difficult to see the main building in the provided picture, please provide more narrative on why the building is not a good representative example of the bungalow type? The Bungalow type is common in Colorado, but that doesn't mean that it should be considered not eligible just because it is a common type. Is this building a good example of that common type? - more info
- **SWL.5273.** It is difficult to evaluate this barn under National Register Criterion A because very little history regarding the barn is provided. The site form states that the "shed is one of many similar function, basic sheds that were built on the Plains in the early to mid-20th Century," but the form does not state the function. - more info
- **5LR.995.4.** In our opinion, there is not information provided on the 1983 site form to determine that the ditch is not eligible for the NRHP. After review of the submitted site form, we believe that the segment does not support the overall eligibility of the entire ditch.
- **SWL.5461.1.** In our opinion, not enough information is provided to determine that the entire ditch is not eligible for the NRHP. The site form states an early date of 1871 and that it serviced alfalfa, corn, dry beans, small grains, sugar beets, and grass pastures. Why is this historic function not significant at the local level in Boulder County? - more info
- **5BL.7606.** Why is this resource not a good local example of the International style? - more info
- **SWL.5308.1.** The site form states that the history of this resource is tied to the history of the New Thomas Lake; however, no history is provided regarding the lake. In order to evaluate the significance of this resource, please provide a short history on the New Thomas Lake. - more info
- **5BL.10359.1.** We concur that this segment has lost integrity and does not support the overall eligibility of the entire linear resource. We do not concur that the entire railroad line is not eligible. In our opinion, the site form only includes detailed information regarding the segment and does not provide enough detailed information regarding the entire line.
- **SWL.852.** Was this resource evaluated as a historic site? According to the *National Register Bulletin: How to Complete the National Register Registration Form* (formally National Register Bulletin 16A), a site is "a location of a significant event, a prehistoric or historic occupation or activity, or a building or structure, whether standing, ruined, or vanished, where the location itself possess historic, cultural, or archeological value - more info

regardless of the value of any existing structure." Was the townsite of St. Vrains significant at the local level for its history?

We concur with the findings of eligibility for the bridges within the Area of Potential Effects as presented in your cover letter and in the survey report. We concur that resource SWL.2985 is eligible and listed on the NRHP on October 15, 2002.

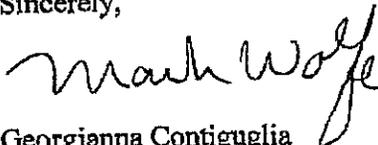
In regards to resource 5LR.11396/Einarsen Farm, we concur that this resource is eligible under National Register Criterion C. Was the resources evaluated under National Register Criterion A for significance in agriculture? The resource features the main house, agricultural outbuildings, and farmed fields that can convey and represent the historic association of agriculture.

Item 44 on the site forms for resources SWL.5267, SWL.5272, and SWL.5274 was not marked. From the narratives and the survey report we were able to determine that the evaluation for these resources under item 44 was "not eligible." Staff has marked the forms accordingly.

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 Coordinator, at (303) 866-4678.

Sincerely,



For Georgianna Contiguglia
State Historic Preservation Officer

STATE OF COLORADO

DEPARTMENT OF TRANSPORTATION

Environmental Programs Branch
4201 East Arkansas Avenue
Shumate Building
Denver, Colorado 80222
(303) 757-9259
FAX (303) 757-9445



October 4, 2007

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

Subject: Additional Information, North I-25 Environmental Impact Statement

Dear Ms. Contiguglia:

This letter includes additional information regarding resources associated with the project referenced above. As requested in your letter of August 21, 2007, included herein is additional data regarding seven architectural properties and six irrigation and railroad properties.

ARCHITECTURAL PROPERTIES

(Revised site forms were prepared for 5WL5574, 5BL7606 and 5LR11391).

5WL852 (Now 5WL5574): You asked if the St. Vrain town site was evaluated as a historic site, and inquired whether it is significant at the local level. We have determined that the initial site form we submitted did not document the proper resource, so we've assigned a new number and provided a revised site form. The property assigned 5WL852 was evaluated as the St. Vrain town site, which was essentially a post office from 1911 to 1918. The name St. Vrain was given to the junction of the Union Pacific and Denver & Boulder Valley railroad lines, and this junction is about 0.3 miles from the flour elevator documented on the attached revised site form and assigned number 5WL5574. According to research, the grain elevator site was in operation from the early 1900s until the 1930s. The building on the site reportedly once housed an office and scale for weighing grain, but currently consists of a shell with no roof, windows, or doors. There were originally four grain elevators on the site; all that is left of these are four circular foundations. Although the property likely had an association with agricultural development in the area, it does not retain the essential physical features that comprised its character and appearance during the period of its association and therefore is not eligible for the National Register. Please note that the photos attached to the initial site form for 5WL852 remain valid.

5WLS201: You disagreed with our eligibility determination and stated that the property is significant under National Register Criterion C as an example of an I-House featuring the Gothic Revival style. We believe that the addition of vinyl siding and the addition on the rear of the house have compromised its integrity and it is therefore not a good representative example of this architectural style. We continue to support our determination that the property is not eligible.

5WLS205: You stated that the house on this property has the potential to be a good example of a saddlebag type residence. Additional research indicates that saddlebag residences are typical in the southeast part of the country. They are characterized as two one-room cabins that are connected and

Ms. Contiguglia
October 4, 2007
Page 3

SWL5308.1: Your office requested additional information regarding the history of the New Thomas Lake Feeder Ditch and its relationship to New Thomas Lake. Archival research indicates that the ditch functions as a supply ditch to both Thomas Lake (built in 1891) and New Thomas Lake, which was built between 1949 and 1979. Research also indicates that the portion of the ditch west of Interstate 25 was built c. 1891, and the ditch to the east of the highway was built c. 1965. CDOT has determined that the entire ditch is not eligible to the NRHP and that the segment in the project area lacks integrity.

We request your concurrence with the additional information and determinations of eligibility outlined herein. If you have questions or require additional information in order to complete your review, please contact CDOT Senior Staff Historian Lisa Schoch at (303) 512-4258.

Very truly yours,

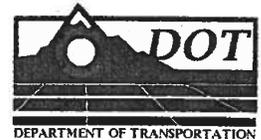

Brad Beckham, Manager
Environmental Programs Manager

Enclosures: Revised site forms

cc: File/R

STATE OF COLORADO

DEPARTMENT OF TRANSPORTATION
CDOT-Region 4
Environmental/Planning
1420 2nd Street
Greeley, Colorado 80631
(970) 350-2204



October 6, 2008

Mr. Edward C. Nichols
State Historic Preservation Officer
Colorado Historical Society
1300 Broadway
Denver, CO 80203

SUBJECT: Additional Determinations of Eligibility, I-25 North Environmental Impact Statement (EIS), CDOT Project No. IM 0253-179, Boulder and Larimer Counties, (CHS#42346)

Dear Mr. Nichols:

This letter and enclosed materials constitute a request for additional determinations of eligibility for the project referenced above. In October 2007, your office concurred with our initial eligibility determinations for historic properties within the I-25 North project corridor. During the summer of 2008, the I-25 North project team discovered five additional properties along the proposed commuter rail corridor between Fort Collins and Longmont requiring survey and inclusion into the EIS.

Methodology and Survey Results

Four of the sites are in Longmont with the remaining property in Berthoud. All five properties are within the boundaries of the Area of Potential Effects (APE) as agreed to by your office on March 21, 2007. In August 2008, Gail Keeley of Hermsen Consultants surveyed three unrecorded properties and re-evaluated two previously recorded sites. Please refer to the table below for a brief description of each site:

OAHP Site Number	Location	Name/Description	Eligibility Assessment
5BL9186	833 Baker Street, Longmont	Residence	Recommended <i>Field - not eligible</i> , 2003
5BL9187	841 Baker Street, Longmont	Residence	Recommended <i>Field - not eligible</i> , 2003
5BL10636	122 8 th Avenue, Longmont	Boggs Residence	Determined NRHP- <i>eligible</i> under Criterion C, 2008
5BL10637	11120 Vermillion Road, Longmont	Carlson Farm	Determined <i>not eligible</i> to the NRHP, 2008
5LR12015	1933 S. County Road 15, Berthoud	Johnstone Residence	Determined <i>not eligible</i> to the NRHP, 2008

Accompanying the site forms is a revised map of the Schmer Farm's (Colorado Office of Archaeology and Historic Preservation [OAHP] Site No. 5LR11209) historic property boundary. The new map corrects an error found in the 2007 Historic Resources Survey Report. This office will submit for review

a determination of effects for National Register of Historic Places (NRHP)-eligible properties within the I-25 North project corridor at a later date.

Eligibility Determinations

5BL10636, Boggs Residence, 122 8th Avenue: This structure was initially constructed in 1939 and appears to have been a rental property since the mid-1960s. The house displays elements of the hipped-roof box style with an arcaded porch and stucco walls indicating a Mediterranean influence. These style elements are unusual for Longmont residences built during the mid-20th century. There is no historically significant individual or event associated with this location. CDOT has determined that 5BL10636 is *not eligible* to the National Register of Historic Places (NRHP) under Criterion A. Despite the introduction of new windows along the basement level during the past 20 years, the Boggs house has retained much of its original integrity and is *eligible* to the NRHP under Criterion C as a good example of the hipped-roof box style.

5BL9186, 833 Baker Street: Cultural Resource Historians, Inc. (CRH) initially surveyed this property as part of the *City of Longmont East Side Neighborhood Historic Context and Survey Report* and recommended 5BL9186 as *not eligible* to the NRHP in May 2003. Modifications to the front porch, the introduction of a garage and new siding since the mid-1970s has altered the structure's original integrity. There are no historically notable individuals or events associated with this residence. CDOT concurs with the previous recommendation that 5BL9186 is *not eligible* to the NRHP under Criteria A and C.

5BL9187, 841 Baker Street: CRH initially surveyed this property as part of the *City of Longmont East Side Neighborhood Historic Context and Survey Report* and recommended the residence as *not eligible* to the NRHP in May 2003. Built in 1961, 5BL9187 is in residential neighborhood dominated by houses dating from the early 20th century. There are no significant historic events or individuals associated with 5BL9187 and the property displays poor physical integrity. CDOT concurs with the earlier recommendation that 5BL9187 is *not eligible* to the NRHP under Criteria A and C.

5BL10637, Carlson Farm, 11120 Vermillion Road: This 155-acre property has been in agricultural production since the early 20th century, but there is no association with any notable historic figure and event in local history. The removal of the original farmhouse for a modern residence during the last decade, and the re-use of the silo as a telecommunication antenna support, has altered the site's original historic integrity. Because there is no association to any historically significant individual or event, and the severity of the alternations to the integrity of the original farm site, CDOT has determined that 5BL10637 is *not eligible* to the NRHP under Criteria A and C.

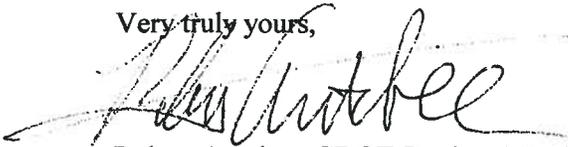
5LR12015, 1933 S. County Road 15: The main house associated with this Berthoud farm site was built in 1915 and underwent remodeling during 2002. There is little detailed information on the property's ownership over the last century. The gradual loss of the surrounding farm acreage to new tract housing has severely altered this site's original historic setting and feeling. For these reasons, CDOT has determined that 5LR12015 is *not eligible* to the NRHP under Criteria A and C.

We request your concurrence with this additional information and determinations of eligibility outlined herein and on the enclosed forms. 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.

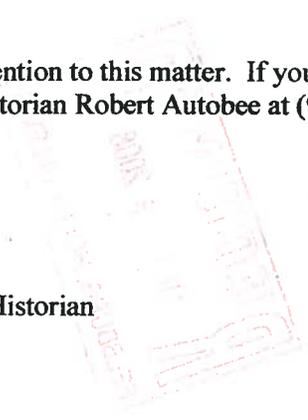
We have also sent this request to the I-25 North EIS consulting parties, the Cities of Greeley and Fort Lupton, for their review and comment.

Thank you in advance for your prompt attention to this matter. If you require additional information, please contact CDOT-Region 4 Senior Historian Robert Autobee at (970) 350-2204.

Very truly yours,



Robert Autobee, CDOT-Region 4 Senior Historian
Environmental/Planning Branch



Enc.

cc: Monica Pavlik, FHWA
Gina McAfee, Jacobs, Carter & Burgess
Thor Gjelsteen, FHU
Carol Parr, CDOT-Region 4
CF

2288
NORTH I-25
EIS

information. cooperation. transportation. *Drawn # 2*

December 1, 2006

Greg Monroe
Colorado State Parks
1313 Sherman Street, Room 618
Denver, CO 80203

Dear Mr. Monroe,

Carter & Burgess, Inc. has been retained by the Colorado Department of Transportation to provide environmental consulting services to complete a transportation study and environmental documentation for the North I-25 DEIS project. The project runs from Denver Union Station to Wellington along I-25.

As part of the environmental impact assessment process we consider the impacts to parks, recreations areas, trails, and any other parcels that have received Land and Water Conservation funding. We have attached maps and tables that identify the parks and open space areas that are adjacent to the project alternatives. We would appreciate confirm whether or not any Land and Water Conservation Funds [6(f)] were used at any of these locations. A map or land description to accompany any results would be useful.

Please respond at your earliest convenience. If you have any questions, feel free to call me at 303-820-4807 or email me at Wendy.Wallach@c-b.com.

Sincerely,



Wendy Wallach, AICP
Carter & Burgess, Inc.

attachments

Cc: Gina McAfee, Thor Gjelsteen



NORTH I-25 EIS

Informational Cooperation Consultation

January 22, 2007

Greg Monroe
Colorado State Parks
1313 Sherman Street, Room 618
Denver, CO 80203

Dear Mr. Monroe,

Carter & Burgess, Inc. has been retained by the Colorado Department of Transportation to provide environmental consulting services to complete a transportation study and environmental documentation for the North I-25 DEIS project. The project runs from Denver Union Station to Wellington along I-25.

As part of the environmental impact assessment process, we consider the impacts to parks, recreations areas, trails, and any other parcels that have received Land and Water Conservation funding. We have attached maps and tables that identify the existing and proposed trails that are adjacent to the project alternatives. We would appreciate confirmation on whether or not any Land and Water Conservation Funds [Section 6(f)] were used at any of these locations. A map or land description to accompany any results would be useful.

Please respond at your earliest convenience. If you have any questions, feel free to call me at 303-820-4807 or email me at Wendy.Wallach@c-b.com.

Sincerely,

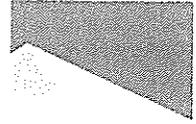


Wendy Wallach, AICP
Carter & Burgess, Inc.

attachments

Cc: Gina McAfee, Thor Gjelsteen

NORTH I-25
EIS



information. cooperation. transportation.

March 8, 2007

Greg Monroe
Colorado State Parks
1313 Sherman Street, Room 618
Denver, CO 80203

Dear Mr. Monroe,

This letter serves as follow up to previous letters sent to you on December 1, 2006 and January 22, 2007 regarding the North I-25 Draft Environmental Impact Statement.

In the email you sent to Diana Bell of Carter & Burgess on January 2, 2007, you indicated that, of the park properties we sent to you, you found only three sites where Land and Water Conservation Funds (LWCF) were used: Pearson Park in Fort Lupton, Grant Park in Northglenn, and Riverside Park in Evans. In a later phone call, you confirmed that these three park properties were the only park and trail facilities that received LWCF funding, of those listed in the tables we provided in the correspondence mentioned above.

In reviewing the locations of these parks relative to potential impact areas, we determined that none of the transportation build alternatives currently under study would require land from any of these properties. I've attached a map that shows the property boundary for Grant Park in relation to proposed impact areas. Pearson Park and Riverside Park are located more than 8 and 14 miles, respectively, from any areas where new right-of-way would be required.

Please indicate your concurrence that the build alternatives would not impact properties where LWCF monies were used by signing below and returning to me at the address listed above. If you have any questions, feel free to call me at 303-820-4807 or email me at Wendy.Wallach@c-b.com.

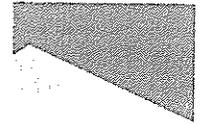
Sincerely,

Wendy Wallach, AICP
Carter & Burgess, Inc.

attachment

Cc: Gina McAfee, Thor Gjelsteen

NORTH I-25 EIS



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Concurrence

Colorado State Parks hereby concurs that the build alternatives under study as part of the North I-25 Draft Environmental Impact Statement would not impact properties where LWCF monies were used.

By: _____

Title: _____

Date: _____

J:_Transportation\071609.400\working\Jim\030707_6fLetter.doc

State of Colorado

DEPARTMENT OF TRANSPORTATION
Region 4 - Loveland Residency
2207 E. Highway 402
Loveland, CO 80537-8885



January 21, 2004

Aaron Linstrom, Terrestrial Biologist
Colorado Division of Wildlife
Denver Service Center and Northeast Region Office
6060 Broadway
Denver, CO 80216

**Re: North I-25 Front Range EIS
Invitation to a Resource Agency Meeting**

Dear Mr. Linstrom:

The Colorado Department of Transportation has issued the Notice to Proceed with the North I-25 Front Range Environmental Impact Statement (EIS) process in CDOT Region Four and the Notice of Intent was published in the Federal Register on December 31, 2003. The goal of this project is to prepare an EIS evaluating future transportation alternatives and improvements for the I-25 corridor between Denver and Fort Collins.

Alternatives under consideration include:

1. Taking no action.
2. Improvements to the existing highway network, particularly I-25 but perhaps also US 85 and US 287.
3. Transit options including bus and rail technologies.
4. Constructing a highway at a new location.

We would like to invite you or your designated representative to participate in the scoping meeting for the Resource Agency Team. This meeting will be:

**Thursday, February 26, 2004
2:00 p.m. to 4:00 p.m.
Loveland CDOT Office
2207 E. Highway 402
Loveland, CO 80537**

At this meeting we will provide a summary of our process and would request your input on any particular issues you wish us to study or processes you wish us to follow.

We look forward to working in a partnership with you to conduct this EIS and determine the best transportation options for Northern Colorado.

Sincerely,

David M. Martinez
Project Manager
CDOT N. I-25 Front Range EIS

cc: Project File



MEETING MINUTES

Air Quality: Nitrogen Deposition Meeting

MEETING DATE: February 20, 2007

LOCATION: CDOT Region 4, Loveland Residency

ATTENDEES: CDOT: Carol Parr, Dave Martinez, Long Nguyen, Ayman Salloum
FHWA: Bill Haas
CDPHE: Lisa Silva, Jim DiLeo, Curt Taipale
EPA: Jeff Kimes, Robert Edgar, Deborah Lebow
Fort Collins: Lucinda Smith
Larimer County Health & Environment: Doug Ryan
NPS: Karl Cordova
FHU: Tom Anzia
C&B: Gina McAfee, Wendy Wallach, Jill Schlaefer

PREPARER: **Carter Burgess**
Gina McAfee

COPIES: Attendees, Bob Garcia, Stan Elmquist, Steve Olson, Monica Pavlik,
Dave Beckhouse Gayl Harrison, Chris Primus, Brian Werle, C&B File
#071609.400

MEETING SUMMARY

1. Carol Parr began the meeting with a brief introduction to the project purpose and need and where we are in the NEPA process.
 2. Wendy Wallach described the DEIS packages: No Action Alternative required I-25 facility upgrades; Alternative A with Commuter Rail, US 85 and feeder system bus service, and I-25 widening; Alternative B with Express Toll and BRT along I-25.
 3. Jim DiLeo asked if we had been coordinating with the MPOs. Gina described this coordination—with the TAC and RCC and relative to the travel demand forecasting model.
 4. Jeff Kimes asked if the BRT is in an exclusive lane. It is, along with HOV and other managed lanes.
 5. Why is a preferred alternative not being identified in the DEIS? Gina described how FHWA normally does their DEIS's - without identifying a preferred alternative.
-

MEETING MINUTES

Air Quality: Nitrogen Deposition Meeting
February 20, 2007
2 of 5

6. Does FHWA only look at construction impacts? Will alternative-fueled vehicles be discussed? Gina described the impact analysis and mitigation commitment process—and the RTA discussions.
7. Will the component analysis look at each component as it stands on its own—or as a cumulative standpoint?
8. Local jurisdictions can implement mitigation like imposing use fees for vehicles as they enter a city center.
9. Gina described the SIP boundaries, the travel patterns, and travel time savings of the Tolled Express Lanes (40 minutes compared to SOVs).
10. Vanpools are a viable option for this area. Could this be something the project could do? Purchase vans?
11. Will our ridership be able to take advantage of the FasTracks corridors?
12. What does the BNSF think about us using their right-of-way? There have been no discussions with them recently. They typically do not interfere in planning studies. There is no reason to think now that there will be an issue.
13. Karl Cordova from RMNP provided a brief discussion of the nitrogen deposition situation (see attached). Ozone is also an issue that will be addressed in the ozone EAC. The increasing NOx is affecting algae, plant species, composition, and variety of species. RMNP has initiated an MOU process with APCD and EPA. The Park is now looking at sources of NOx. The weather conditions bring air masses from the east which deposit gases in the park. Potential sources come from the east. The Park also in looking at their own operations.

Suspected sources are:

- ▶ NOx
 - ▶ Ammonia
14. Jill Schlaefter described the air quality analysis we will do from a transportation conformity standpoint. Both Larimer County and Weld County are projected to grow noticeably. Farmland is decreasing. The transportation analysis will look at VMT, speeds, EMIT (air quality), and hot spot analysis for CO and PM₁₀.

For the RMNP analysis, we will need to look at NOx and PM₁₀.

NOx emissions will be dropping due to increase emissions controls, even though there will



MEETING MINUTES

Air Quality: Nitrogen Deposition Meeting
February 20, 2007
3 of 5

be increased VMT due to the improvements. This is also occurring with the No-Action Alternative.

15. Curt Taipale provided information about the monitoring data and emissions inventory. NOx and ammonia are the sources—split 50/50. Mobile sources are not the dominant source (45 percent in 2003 for NOx). Livestock is a noticeable source of ammonia. In 2018, mobile sources are predicted to decrease by 21 percent. Oil and gas goes up from 5 percent to 10 percent.

For ammonia, mobile sources go from 13 percent to 15 percent. Livestock goes from 42 percent to 40 percent.

Speed is a factor for NOx, with lowest emissions between 35 mph and 50 mph. And higher emissions at lower speeds and higher speeds.

16. Jill noted that FHWA analysis show that even with increases in VMT (doubling) and default speeds, NOx will continue to go down.
17. What are the sources in the RMNP? Not known yet.
18. The data will be available in a preliminary manner soon.
19. How will the recent APCD rule changes for oil and gas affect the situation?
20. The analysis we will be doing is:
- ▶ NOx emissions—that includes speed, and for different geographic areas (using EMIT).
21. The Larimer County Environmental Board is looking at the effect our alternatives may have on nitrogen deposition and regional haze. We should specifically mention this in the DEIS.
22. Can we look at what factors will have an influence on Estes or Loveland or other neighborhoods between I-25 and RMNP?
23. Would we be able to look at the monitoring data and disclose what the transportation component is and what portion of that would come from our project?
24. There is a requirement in NEPA to disclose impacts. This information can be used by CDOT and locals to discuss what could be done to make the situation better. Other issues besides transportation here are land use/development and oil and gas. Will the
-

MEETING MINUTES

Air Quality: Nitrogen Deposition Meeting
February 20, 2007
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transportation and widened highways make this a more attractive place to live and work?
Will there be less development if no transportation improvements at all are made?

25. In the cumulative impacts analysis, we will need to look at the cumulative impacts of all reasonable foreseeable changes to NOx deposition and ammonia. Can we commit to mitigation in concert with the NRDP strategies and indicate which entity would have responsibility for implementation?
 26. In California, there is a similar situation with SH 99 and adjacency to Class 1 areas (Yosemite) and livestock. We could look at what the CARB is requiring there.
 27. All participants are invited to come to the upcoming committee meetings:
 - ▶ Land Use—May 10
1:30 p.m. (Technical Advisory Committee)
3:00 p.m. (Regional Coordination Committee—Policy-makers)
 - ▶ Air Quality—July 12
1:30 p.m. (Technical Advisory Committee)
3:00 p.m. (Regional Coordination Committee—Policy-makers)
 28. Will Package A increase development overall since it adds improvements to three corridors? From a nitrogen deposition perspective, is it better to have development spread out?

Package A does have more potential for TOC. It goes along the older established communities and fits with their development plans to strengthen the city cores. Package B addresses more of the development along I-25.
 29. Lisa Silva discussed possible mitigation strategies.
 - ▶ VMT reduction (HOV lanes, rail, buses)
 - ▶ VMT reduction (no vehicles zones, bicycles lanes or trails, pedestrian friendly, access to natural areas)
 - ▶ Roundabouts instead of signalized intersections
 - ▶ ITS (queue jumps, etc.)
 30. The St. George “Smart Growth” chapter findings could be shared with the TAC/RCC. CDOT or FHWA could discuss mitigation to assist with city or county planning. The DEIS should acknowledge the interest of land use from the NFRMPO.
-

MEETING MINUTES

Air Quality: Nitrogen Deposition Meeting
February 20, 2007
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31. Could there be a variable message sign that gives variable speed limits? This could make the traffic go at a more consistent speed. Ramp metering does the same thing.
32. Transportation pricing is a good way to manage demand.
33. Jim DiLeo expressed a concern about DMU emissions with the commuter rail.

SIGN IN SHEET

Air Quality—Nitrogen Deposition Meeting
Tuesday, February 20, 2007
12:30 p.m. to 4:00 p.m.
CDOT Region 4, Loveland Residency

Name	Agency	E-Mail Address
Carol Parr	CDOT	Carol.parr@cdot.state.co.us
Gina McAfee	C&B	gina.mcafee@c-b.com
Wendy Wallach	C&B	wendy.wallach@c-b.com
Jill Schlaefer	C&B	jill.schlaefer@c-b.com
TOM ANZIA	FNU	TOM.ANZIA@FHUENG.COM
Jeff Kimes	EPA	Kimes.jeffrey@epa.gov
Robert Edgar	EPA	edgar.robert@epa.gov
DEBORAH LEBOW	EPA	lebow.deborah@epa.gov
Dave Martinez	CDOT Region 4	David.M.Martinez@dot.state.co.us
Lucinda Smith	City of Fort Collins	lsmith@fcgov.com
Pong Ryan	Harmer Co Health + Environment	dryan@harmer.org

SIGN IN SHEET

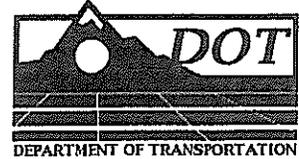
Air Quality—Nitrogen Deposition Meeting
 Tuesday, February 20, 2007
 12:30 p.m. to 4:00 p.m.
 CDOT Region 4, Loveland Residency

Name	Agency	E-Mail Address
Karl Cordova	National Park Service	karl_cordova@nps.gov
Bill Haas	FHWAA	william.haas@fhwa.dot.gov
Lisa Silva	APCD / CDPHE	lisa.silva@state.co.us
Jim Dileo	APCD	jim.dileo@state.co.us
Curt Taipale	CDPHE - APCD	curtis.taipale@state.co.us
LONG NGUYEN	CDOT - R4	Long.Nguyen@dot.state.co.us
Ayman Salloum	CDOT - R4	Ayman.Salloum@dot.state.co.us

STATE OF COLORADO

DEPARTMENT OF TRANSPORTATION
Region Four

2207 East Highway 402
Loveland, CO 80537
(970) 622-1270 Fax (970) 669-0289



December 8, 2006

Ms. Kirstie Nixon
Director
Motor Carrier Services Division
Colorado Department of Revenue
1881 Pierce Street, Room 118
Lakewood, CO 80214-1497

Re: **CDOT's North I-25 Environmental Impact Study and Basic Engineering – New Port of Entry Facility**

Dear Ms. Nixon:

Attached please find the North I-25 Environmental Impact Study Technical Memorandum and Basic Engineering for the new Port of Entry facility between Harmony Road and Prospect Road in Fort Collins.

Please review this document and forward any comments to me by **December 22, 2006**. If you have any questions or need any additional information, please contact me at 970-622-1280 or Long.Nguyen@dot.state.co.us.

Thank you for your assistance and participation on this project.

Sincerely,

A handwritten signature in black ink, appearing to read 'Long Nguyen', is written over a horizontal line. The signature is fluid and cursive.

Long Nguyen, P.E.
Colorado Department of Transportation
Assistant Project Manager

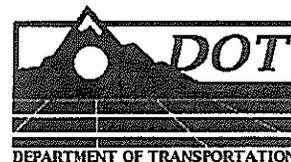
Cc: D. Martinez (CDOT), S. Olson (CDOT), T. Anzia (FHU) J. Sharps (FHU)

Attachments

STATE OF COLORADO

DEPARTMENT OF TRANSPORTATION
Region Four

2207 East Highway 402
Loveland, CO 80537
(970) 622-1270 Fax (970) 669-0289



December 8, 2006

Mr. Roger A. Reisig
District Supervisor
Motor Carrier Services Division
Colorado Department of Revenue
2237 Frontage Road S.W.
Fort Collins, CO 80525

Re: **CDOT's North I-25 Environmental Impact Study and Basic Engineering – New Port of Entry Facility**

Dear Mr. Reisig:

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Thank you for your assistance and participation on this project.

Sincerely,

Long Nguyen, P.E.
Colorado Department of Transportation
Assistant Project Manager

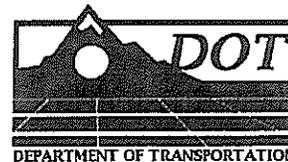
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Attachments

STATE OF COLORADO

DEPARTMENT OF TRANSPORTATION
Region Four

2207 East Highway 402
Loveland, CO 80537
(970) 622-1270 Fax (970) 669-0289



December 8, 2006

Mr. Rick Archer
Motor Carrier Services Division
Colorado Department of Revenue
1881 Pierce Street, Room 118
Lakewood, CO 80214-1497

Re: **CDOT's North I-25 Environmental Impact Study and Basic Engineering – New Port of Entry Facility**

Dear Mr. Archer:

Attached please find the North I-25 Environmental Impact Study Technical Memorandum and Basic Engineering for the new Port of Entry facility between Harmony Road and Prospect Road in Fort Collins.

Please review this document and forward any comments to me by **December 22, 2006**. If you have any questions or need any additional information, please contact me at 970-622-1280 or Long.Nguyen@dot.state.co.us.

Thank you for your assistance and participation on this project.

Sincerely,

Long Nguyen, P.E.
Colorado Department of Transportation
Assistant Project Manager

Cc: D. Martinez (CDOT), S. Olson (CDOT), T. Anzia (FHU) J. Sharps (FHU)

Attachments

State of Colorado

DEPARTMENT OF TRANSPORTATION
Region 4 - Loveland Residency
2207 E. Highway 402
Loveland, CO 80537-8885



January 21, 2004

David Noe
Chief of Engineering Geology
Colorado Geological Survey
1313 Sherman Street, Room 715
Denver, CO 80203

**Re: North I-25 Front Range EIS
Invitation to a Resource Agency Meeting**

Dear Mr. Noe:

The Colorado Department of Transportation has issued the Notice to Proceed with the North I-25 Front Range Environmental Impact Statement (EIS) process in CDOT Region Four and the Notice of Intent was published in the Federal Register on December 31, 2003. The goal of this project is to prepare an EIS evaluating future transportation alternatives and improvements for the I-25 corridor between Denver and Fort Collins.

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We would like to invite you or your designated representative to participate in the scoping meeting for the Resource Agency Team. This meeting will be:

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We look forward to working in a partnership with you to conduct this EIS and determine the best transportation options for Northern Colorado.

Sincerely,



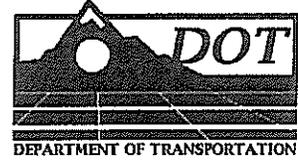
David M. Martinez
Project Manager
CDOT N. I-25 Front Range EIS

cc: Project File

STATE OF COLORADO

DEPARTMENT OF TRANSPORTATION
Region Four

2207 East Highway 402
Loveland, CO 80537
(970) 622-1270 Fax (970) 669-0289



December 8, 2006

Mr. Dan Wells
Motor Carrier Services Division
Colorado Department of Revenue
1881 Pierce Street, Room 118
Lakewood, CO 80214-1497

Re: **CDOT's North I-25 Environmental Impact Study and Basic Engineering – New Port of Entry Facility**

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Thank you for your assistance and participation on this project.

Sincerely,

Long Nguyen, P.E.
Colorado Department of Transportation
Assistant Project Manager

Cc: D. Martinez (CDOT), S. Olson (CDOT), T. Anzia (FHU) J. Sharps (FHU)

Attachments

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