

RECORD OF DECISION 2

for the

I-25 VALLEY HIGHWAY
LOGAN TO US 6
DENVER, COLORADO

FHWA-CO-EIS-05-01-F

for the portion including the

US 6 BRIDGES DESIGN BUILD PROJECT

BR 0061-083

US DEPARTMENT OF TRANSPORTATION
FEDERAL HIGHWAY ADMINISTRATION

and

COLORADO DEPARTMENT OF TRANSPORTATION

January 2013

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STATUTE OF LIMITATIONS

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ENVIRONMENTAL IMPACT STATEMENT AVAILABILITY

The Final Environmental Impact Statement and 2007 Record of Decision are attached to this document in electronic format on a compact disc. If you cannot open or use this disc and would like to view a hard copy, please contact either of the above individuals. You can also download a copy of the documents at www.coloradodot.info/library/studies/i-25-valley-highway-EIS.

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List of Abbreviated Terms

AM	morning
APE	Area of Potential Effect
BMP	best management practice
CABI	Certified Asbestos Building Inspector
CCD	City and County of Denver
CDOT	Colorado Department of Transportation
CDPHE	Colorado Department of Public Health and Environment
CDPS	Colorado Discharge Permit System
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CLMR	Conditional Letter of Map Revision
CML	Consolidated Main Line
CO	carbon monoxide
CPW	Colorado Parks and Wildlife
CWA	Clean Water Act
DEIS	Draft Environmental Impact Statement
DRCOG	Denver Regional Council of Governments
EB	eastbound
EDR	environmental data resources
EIS	Environmental Impact Statement
EPA	US Environmental Protection Agency
FACWet	Functional Assessment for Colorado Wetlands
FASTER	Funding Advancement for Surface Transportation and Economic Recovery
FEIS	Final Environmental Impact Statement
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FRA	Federal Railroad Administration
FTA	Federal Transit Administration
HASP	Health and Safety Plan
I-25	Interstate 25
IGA	intergovernmental agreement
ISA	initial site assessment
ITS	intelligent transportation system
LWCF	Land and Water Conservation Fund
LOS	level-of-service
LUST	leaking underground storage tank
MESA	modified environmental site assessment
MMP	Materials Management Plan
MS4	municipal separate storm sewer system
MSAT	mobile source air toxics
NAAQS	National Ambient Air Quality Standard
NB	northbound
NEPA	National Environmental Policy Act
NPS	National Park Service
O ₃	ozone

OSHA	U.S. Department of Labor Occupational Safety and Health Administration
OPS	Colorado Department of Labor and Employment, Division of Oil and Public Safety
PA	Programmatic Agreement
PEL	Planning and Environmental Linkages
PM	afternoon/evening
PM ₁₀	particulate matter less than 10 microns in size
PUC	Public Utilities Commission
RCRA	Resource Conservation and Recovery Act
ROD	Record of Decision
ROD2	Record of Decision 2
ROW	right-of-way
RTD	Regional Transportation District
RTP	Regional Transportation Plan
SB	southbound
SB 40	Senate Bill 40
sf	square feet
SHPO	State Historic Preservation Office
SIP	State Implementation Plan
STIP	Statewide Transportation Improvement Program
TIP	Transportation Improvement Program
T-REX	Transportation Expansion Project
US	United States
US 6	6 th Avenue, or United States Highway 6
USACE	US Army Corps of Engineers
USC	US Code
USFWS	US Fish and Wildlife Service
VMS	variable message sign
WB	westbound

1 Introduction

In 2006, the Federal Highway Administration (FHWA) and the Colorado Department of Transportation (CDOT) published the Interstate 25 (I-25) Valley Highway Logan to United States Highway (US) 6 Final Environmental Impact Statement (FEIS). Because of funding limitations, the FEIS identified a Preferred Alternative to be implemented in multiple phases, shown in Figure 1. In 2007, FHWA and CDOT prepared a Record of Decision (2007 ROD) for Preferred Alternative Phases 1 and 2. Phase 2 was recently constructed, and a portion of Phase 1 is currently under construction. This document concludes the final decision for the remaining portions of Phase 1 and Phase 5 along US 6, and includes new, minor project elements that complement the Preferred Alternative in these phases.

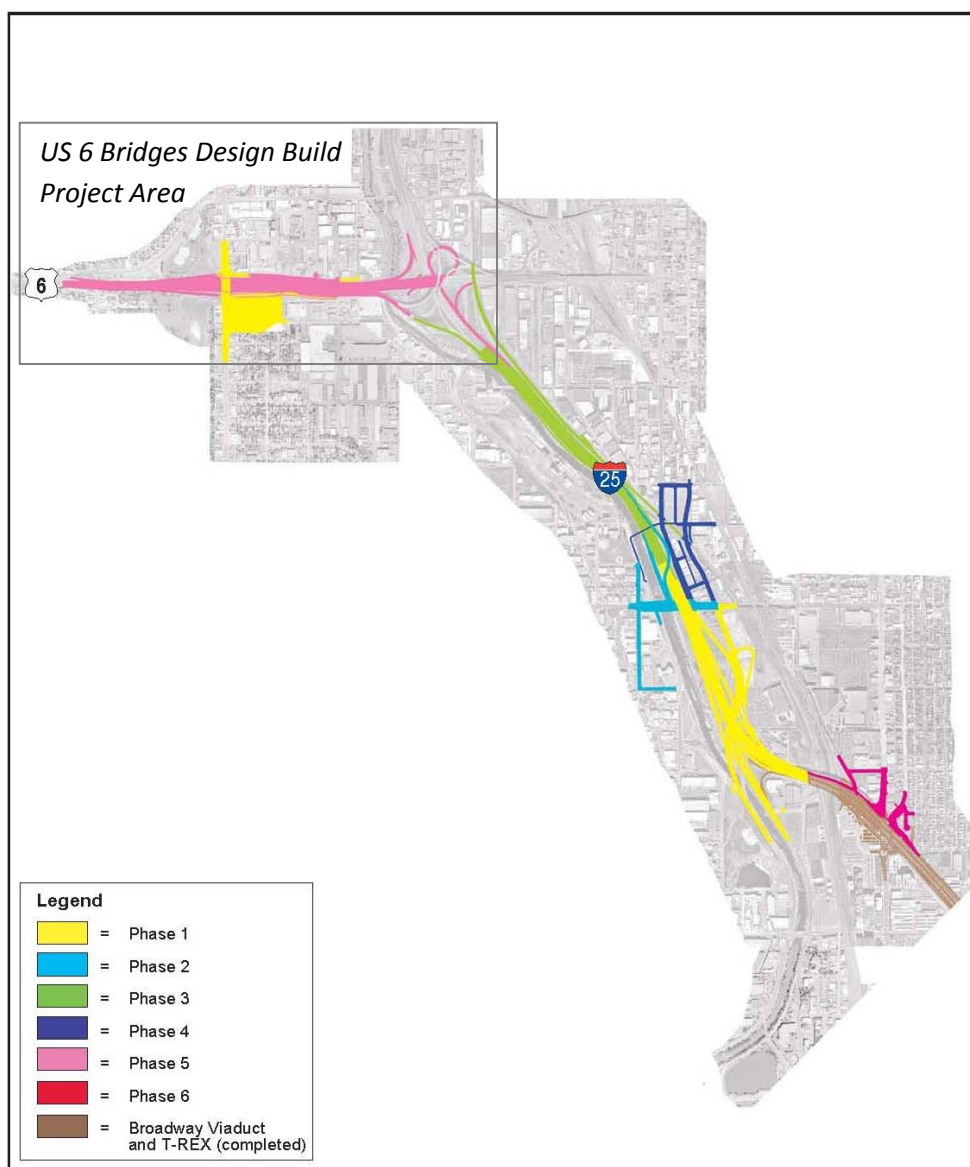


Figure 1: FEIS Phased Implementation of the Preferred Alternative
(source: I-25 Valley Highway FEIS)

Since publication of the FEIS and the 2007 ROD, CDOT has secured funding for these additional phases of the FEIS Preferred Alternative. This remaining portion is called the US 6 Bridges Design Build Project (herein referred to as the Project). The Project includes modifications to the roadway, interchanges, and bridges along 6th Avenue (US 6) between Sheridan Boulevard and just east of the BNSF Railway Company (BNSF Railway) tracks in Denver, Colorado, as shown in Figure 2, and is fully described in Section 1.2.

CDOT is preparing this second Record of Decision (ROD2) to update the findings described in the FEIS and document the environmental analyses for all improvements that are part of the Project. ROD2 documents that changes to the FEIS proposed action and new information do not cause environmental impacts that are significant. A portion of the 2007 ROD in the vicinity of Federal Boulevard (see Figures 1 and 2) has been reevaluated and the commitments for that portion of the 2007 ROD are being incorporated into this ROD2. The portion of project in the vicinity of Federal Boulevard has been reevaluated due to design refinements as shown in Section 2.5.1.

The ROD2 documents a new FHWA decision for the FEIS Preferred Alternative Phase 5, and for the new, minor project elements. The ROD2 includes a resource evaluation for the Project as a whole, and a formal Environmental Reevaluation (Form 1399) of the FEIS and portions of the 2007 ROD. The Reevaluation is included as Appendix A. The ROD2 has been prepared in compliance with FHWA Regulation 23 Code of Federal Regulations (CFR) 771, Council on Environmental Quality (CEQ) Regulations 40 CFR 1500-1508, and the requirements of the National Environmental Policy Act of 1970 (NEPA), as amended.

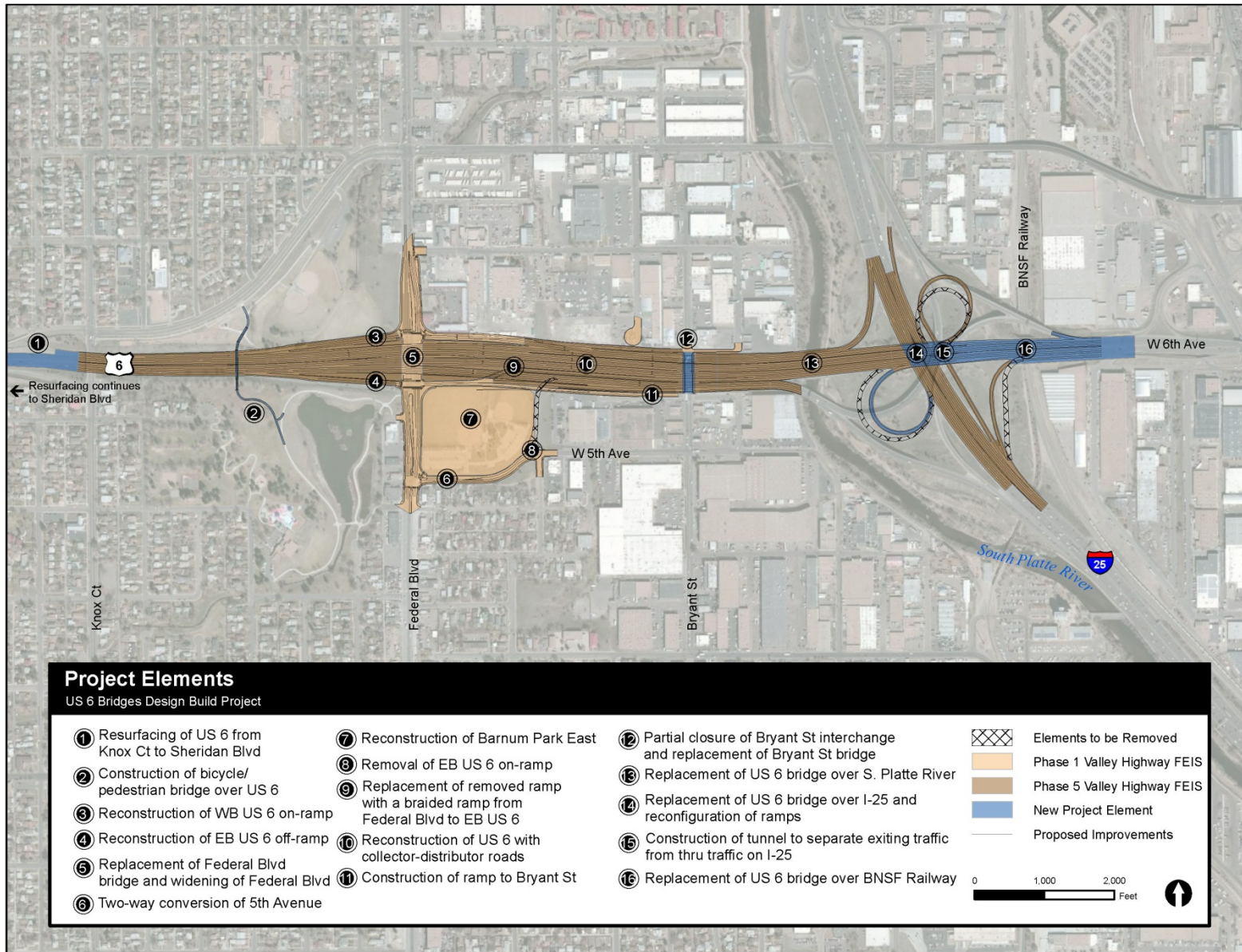


Figure 2: ROD2 Project Elements

1.1 FEIS Preferred Alternative and Phased Implementation

The FEIS Preferred Alternative includes the reconstruction of I-25 and reconfiguration of interchanges from Logan Street to US 6, and the reconstruction of US 6 and ramp improvements from I-25 to Federal Boulevard. Section 2.3 describes the Preferred Alternative in more detail.

At the time of the FEIS, funding had not been identified for the entire Preferred Alternative, thus FHWA and CDOT planned for a phased implementation of the Preferred Alternative. These six phases are shown in Figure 1 and outlined in Chapter 7 of the FEIS. A portion of Phase 1 (the I-25/Santa Fe Drive area) is currently under construction, and construction of Phase 2 (the I-25/Alameda Avenue interchange) was completed in September 2012. Section 2.4 describes the phased implementation in more detail.

The identification of a Preferred Alternative for the entire project in the FEIS is consistent with FHWA's objective of analyzing and selecting transportation solutions on a broad enough scale to avoid segmentation. The selection in the 2007 ROD and this ROD2 of initial phases for implementation is consistent with the 2008 FHWA guidance "Transportation Planning Requirements and Their Relationship to NEPA Process Completion" (along with the February 2011 supplement) to have funding for projects identified before final decisions are made. As outlined in the 2007 ROD, subsequent project phases will be selected and implemented as additional funding becomes available, and for each phase, a ROD will be issued.

Although the Federal Railroad Administration (FRA), Federal Transit Administration (FTA), and Regional Transportation District (RTD) were cooperating agencies on the FEIS and 2007 ROD, the Project does not impact facilities owned or operated by these agencies. Therefore, FHWA sent letters to each requesting confirmation that they will not be a cooperating agency for ROD2. FTA and RTD have confirmed that they are not cooperating agencies on this project; their letters can be found in Appendix B.

1.2 Description of the Selected Alternative

This ROD2 selects the following elements for implementation:

- A portion of Phase 1 (the portion including the US 6/Federal Boulevard interchange), described in Section 1.2.1
- All of Phase 5, described in Section 1.2.2
- Six new minor elements, described in Section 1.2.3

Figure 2 shows the Selected Alternative (the Project) including a color key indicating which elements are from Phase 1 and Phase 5 of the Preferred Alternative, and which minor elements are new. All together, the Project includes the following:

1. Pavement resurfacing of US 6 from Knox Court to Sheridan Boulevard (**New Project Element**)
2. A bicycle/pedestrian bridge over US 6, connecting Barnum Park North and Barnum Park (also known as Barnum Park South, and herein referred to as Barnum Park South), which is included to mitigate Section 4(f) impacts (**New Project Element**)
3. Reconstruction of the Federal Boulevard to westbound (WB) US 6 on-ramp as part of a diamond interchange (**Phase 5**)
4. Reconstruction of the eastbound (EB) US 6 to Federal Boulevard off-ramp (**Phase 5**)
5. Replacement of the functionally obsolete Federal Boulevard Bridge over US 6 and widening of Federal Boulevard, from five to six lanes, from 5th to 7th Avenues (**Phase 1**)
6. Conversion of 5th Avenue to two-way traffic from Federal Boulevard to Decatur Street (**Phase 1**)
7. Reconstruction of Barnum Park East to include in-kind replacement of impacted facilities, which is included to mitigate Section 4(f) impacts (**Phase 1**)
8. Removal of the Federal Boulevard/5th Avenue ramp to EB US 6 (**Phase 1**)
9. Replacement of removed ramp with a braided ramp from Federal Boulevard to EB US 6, providing access to US 6, I-25, and Bryant Street (**Phase 5**)
10. Reconstruction of US 6 with collector-distributor roads/auxiliary lanes from Federal Boulevard to the BNSF Railway bridge structure (**Phase 5**)
11. Construction of ramp from EB US 6 to Bryant Street (**Phase 1**)
12. Closure of the WB US 6 to Bryant Street ramp (**Phase 1**) and replacement of the structurally deficient Bryant Street Bridge over US 6 (**New Project Element**)
13. Replacement of the structurally deficient US 6 bridge over the South Platte River (**Phase 5**)
14. Replacement of the functionally obsolete US 6 bridge over I-25 (**New Project Element**) and reconfiguration of ramps (**Phase 5 and New Project Element**)
15. Construction of a tunnel along the east side of I-25, under US 6, to separate traffic on northbound (NB) I-25 from traffic exiting the interstate to travel west on US 6 (**Phase 5**)
16. Replacement of the structurally deficient US 6 bridge over the BNSF Railway (**New Project Element**)

Figure 3 shows how the FEIS, 2007 ROD, and ROD2 relate to one another.

US 6 Bridges Design Build Project Environmental Clearance Process

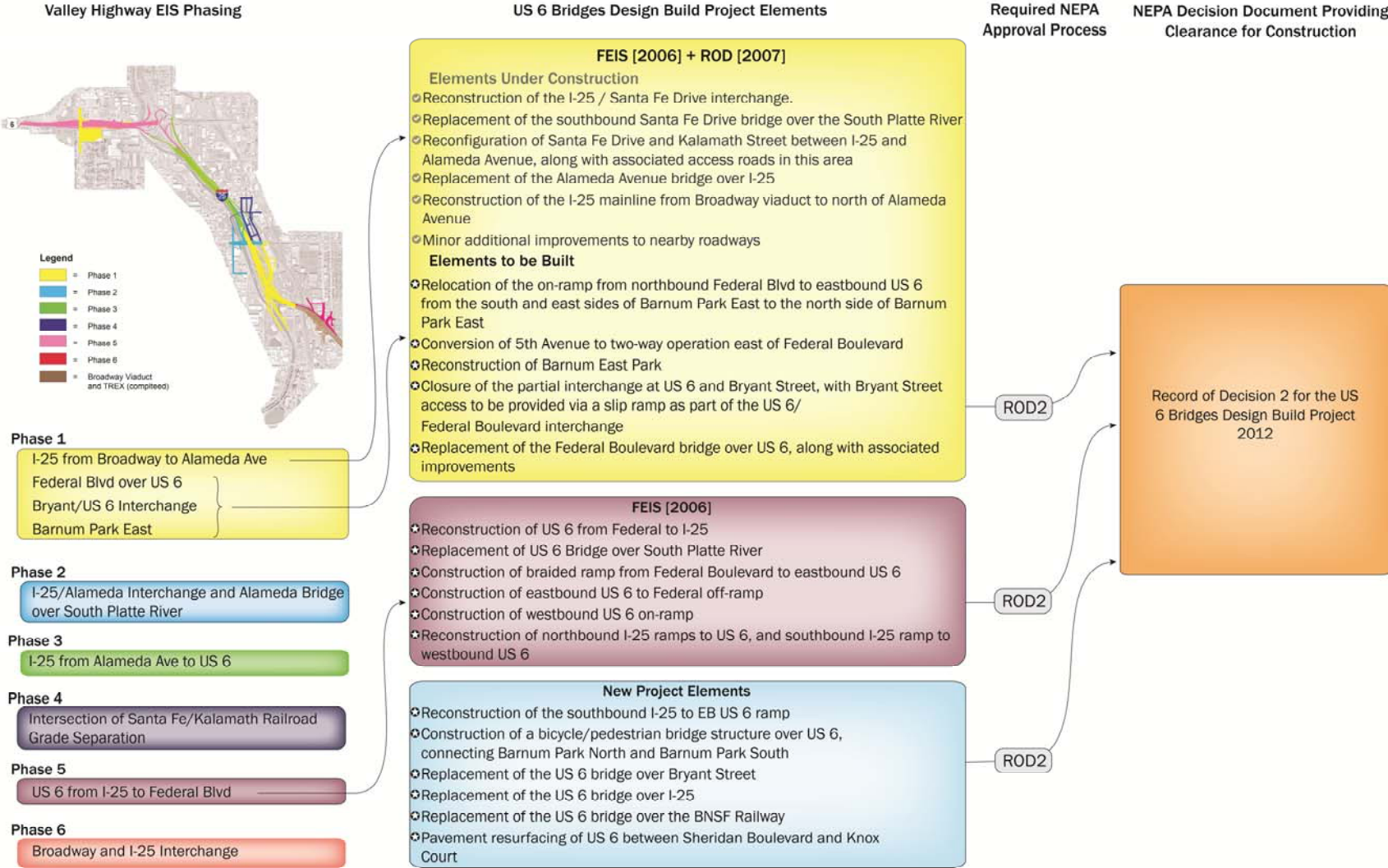


Figure 3: ROD2 Environmental Clearance Process

1.2.1 Phase 1 from the 2007 ROD

The Project includes elements of Phase 1 from the 2007 ROD, which are shown in Figure 2 and color-coded yellow. These parts of Phase 1 are being reevaluated because there have Project changes, including regulation changes and design refinements, since it was cleared as part of the 2007 ROD, and because the Project is proceeding to the next major approval or action. The design refinements are described in Section 2.5.

1.2.2 Phase 5 from the FEIS

The Project includes Phase 5 from the FEIS, the elements of which are shown in Figure 2 and color-coded purple. Phase 5 is being evaluated with a new decision document because there have been refinements to the Project design since it was evaluated as part of the FEIS, and because greater than three years have elapsed since the last major approval action for the FEIS. The design refinements are described in Section 2.5.

1.2.3 New Project Elements

The Project includes six new elements that were not part of the FEIS or 2007 ROD, which are shown in Figure 2 and color-coded blue. Due to the minor environmental impact and nature of these new elements, they will not affect the independent utility, logical termini, or the Preferred Alternative of the FEIS. The ROD2 discloses the impacts and associated mitigation for the new elements, demonstrating that there are no significant impacts (see Appendices A and N). The new elements are listed in Section 1.2.

1.3 Purpose of the Project

The purpose of the I-25 Valley Highway Project is listed below and discussed in Chapter 1 of the FEIS. The purpose of the current Project is consistent with the purpose of the FEIS, but is focused on US 6. The purpose statements that apply to the Project are shown in **bold**.

- Provide lane continuity and balance on I-25 from Logan to US 6, linking with sections of I-25 to the north and south
- Optimize highway system operations while recognizing the constraints on highway expansion identified through the regional transportation planning process
- **Improve connectivity between transportation modes**
- **Improve pedestrian and bicycle mobility across the project corridor**
- **Increase safety along and across the corridor for motorists, pedestrians, and bicyclists**
- **Correct roadway deficiencies along I-25 and US 6 to meet current design standards to provide a safer, more efficient, and more reliable transportation system**
- Increase safety and reduce congestion and delays related to the at-grade crossing of Santa Fe Drive/Kalamath Street and the Consolidated Main Line (CML) railroad

The Project contributes to and is consistent with meeting the purpose and need for the entire FEIS Preferred Alternative, as shown in Table 1.

Table 1: Purpose and Need Objectives Addressed by Project

Need Category	Overall FEIS Objective	How the US 6 Bridges Design Build Project addresses the Objective
Inter-modal Relationships and Bicycle/ Pedestrian Mobility	Preserve existing or provide improved facilities for automobile, bus, and pedestrian connections. Upgrade bicycle/pedestrian facilities within and across the project corridor to provide improved access to the South Platte River Trail, safer facilities at intersections, complete missing links in the bicycle/pedestrian systems, and provide better linkages between transportation modes	<p>Replacement of bridge structure over the South Platte River Trail will result in increased vertical clearance for trail users</p> <p>Improved pedestrian facilities on the Federal Boulevard bridge over US 6 will enhance mobility and user experience</p> <p>New bicycle/pedestrian bridge over US 6 will link Barnum Park North to Barnum Park South and provide access to regional trails</p>
Safety	Increase safety and decrease the likelihood of accidents within the project corridor by improving the geometric design of the roadway	<p>Reduce weaving movements due to reconstruction of US 6 from just east of the BNSF Railway to Knox Court, including collector-distributor roads</p> <p>Decrease likelihood of accidents on US 6 due to partial closure of Bryant Street interchange and reconfiguration of the US 6/Federal Boulevard interchange including the elimination of the existing on-ramp and construction of braided ramp to EB US 6 from Federal Boulevard</p> <p>Decrease likelihood of accidents at the US 6/I-25 interchange due to the reconfiguration of NB I-25 to EB US 6 on ramp and the reconfiguration of on ramps to EB US 6 from NB and southbound (SB) I-25</p>
Roadway Deficiencies	Address existing roadway deficiencies, and replace aging structures to provide for improved operation of and reduced maintenance costs for the roadway facilities	<p>Replacement of aging, deficient bridge carrying Federal Boulevard over US 6</p> <p>Replacement of aging, deficient bridges carrying US 6 over Bryant Street, the South Platte River, I-25, and the BNSF Railway</p> <p>Resurfacing of US 6 from Knox Court to Sheridan Boulevard to improve pavement surface</p>

1.4 Project Funding Scenario

The Denver Regional Council of Governments (DRCOG) is federally charged with developing a long-range transportation plan for the Denver region, which is the 2035 Metro Vision Regional Transportation Plan (RTP). Part of the plan is the *Conformity of the Fiscally Constrained 2035 Regional Transportation Plan with the State Implementation Plan (SIP) for Air Quality*, which examines transportation needs and identifies federal and state funding that can reasonably be expected to be available for major transportation projects within the current planning horizon.

The Project, being selected with this ROD2, has a total estimated cost of approximately \$120.7 million in year of expenditure dollars. Table 2 shows how CDOT plans to fund the Project.

Table 2: Project Funding Sources

Project funding sources (In YOE \$)	
Non-Bridge Enterprise	\$66,100,000
Bridge Enterprise (State)	\$54,608,424
Total	\$120,708,424

(Source: CDOT, US 6 Bridges Design/Build Financial Plan, 2012)

The RTP includes \$31.2 million for the interchange and ramp reconstruction at US 6/Federal Boulevard and US6/Bryant Street. The remaining \$89.5 million (i.e. the difference between the estimated cost of the Project and the amount included in the RTP) needed to fund the Project will be covered by a portion of the revenue identified in the RTP for CDOT Administered Funds (which comprise non-project specific sources such as the Funding Advancement for Surface Transportation and Economic Recovery (FASTER) Bridge, Bridge Programs, FASTER Safety, Safety Programs, and Surface Treatment).

The scope of the Project is consistent with the RTP. Though the other Project elements are not listed in the RTP, these elements involve in-kind reconstruction and replacement and do not alter the vehicular capacity of the Project roadways. The Project selected in this ROD2 is within the SIP emissions budgets demonstrating air quality conformity for the fiscally constrained elements in the RTP.

1.5 Logical Termini and Independent Utility

Independent utility means that a proposed project would be a reasonable expenditure and would be usable even if no additional improvements are made in the area. Logical termini in the NEPA process are the rational physical extents or endpoints for the proposed project improvements and review of environmental impacts. Chapter 7 of the FEIS identified phases for the entire Preferred Alternative, and all phases have independent utility and logical termini. As stated in the FEIS, CDOT and FHWA intend to work towards implementation of the Preferred Alternative through its entirety with a phased approach as funds become available. The phased implementation approach is consistent with FHWA requirements to have funding for projects identified prior to the completion of a decision document.

1.5.1 Independent Utility of Project

As demonstrated in the FEIS, each phase of the Preferred Alternative has its own independent utility. The 2007 ROD discusses how funding limitations made it difficult to predict the timing of future phases, and therefore, how measures were taken to ensure the independent utility of approved phases.

The FEIS documented that the Phase 1 and Phase 5 improvements are independent from each other, from other FEIS phases, and from any adjacent or related planned improvements by CDOT or others. Since there have been no substantive changes to the physical extent of these phases or the modifications within the phases, the independent utility of these phases has not changed.

The addition of the new, minor elements to the Project does not require the Project to rely on or preclude any other improvements; thus, the addition does not change its independent utility. The significance of the new elements has been determined to be minimal because:

- The pavement resurfacing between Sheridan Boulevard and Knox Court is a maintenance upgrade and does not rely on or preclude any other improvements
- The BNSF Railway bridge replacement does not rely on or preclude any other improvements as it is not tied to any other structure or facility
- The bicycle/pedestrian bridge over US 6 is a discrete element that connects to existing pedestrian and bicycle trails and parkland
- The replacement of the US 6 bridges over Bryant Street and I-25 and the reconstruction of the SB I-25 to EB US 6 ramp are tied to FEIS Phases 1 and 5 US 6 mainline and ramp improvements, but do not rely on or preclude improvements that are not part of the Project

Section 1.6 describes other transportation projects in the vicinity of the Project. While the Project does not rely on these improvements, their resulting roadway configurations were accounted for during design.

1.5.2 Logical Termini of the Project

While Phase 5 of the FEIS ends at Knox Court, the Project includes pavement resurfacing from Knox Court to Sheridan Boulevard, the western terminus of the Project. The existing pavement section is at the end of its design life. The resurfacing consolidates construction impacts to the public by fulfilling this need now rather than having separate projects constructed at different times.

Adjacent to the resurfacing of this Project is the separate CDOT project reconstructing the US 6 bridge over Sheridan Boulevard, currently under construction, which also includes pavement resurfacing. Sheridan Boulevard is a logical terminus for the Project because it will fill in what will otherwise be a gap between the eastern edge of the new, upgraded pavement surface between the Sheridan Boulevard interchange and the western edge of Phase 1 of the FEIS (ending at Knox Court). This will provide motorists along US 6 with a continuous smooth and safe riding surface and reduce construction impacts by completing this as part of the Project.

The eastern terminus of Phase 5 of the FEIS is just east of the I-25 interchange. The eastern terminus of the Project, however, is immediately east of the bridge over the BNSF Railway to include replacement of this structurally deficient bridge. It is logical to extend the eastern terminus of the Project a short distance to correct a safety issue on the adjacent structure; and funding is available for this safety improvement. In addition, this location is the formal transition point between US 6, a freeway, and 6th Avenue, a surface street, making it a logical place to end the Project.

The north and south Project limits are consistent with the limits presented in the FEIS and 2007 ROD. These limits were documented to be logical termini at that time. Since there have been no substantive changes to these parts of the Project—along Federal Boulevard and I-25—the determination of logical

termini have not changed. The north limit is 7th Avenue along both Federal Boulevard and I-25, and the south limits are Short Place along Federal Boulevard and just south of the I-25/US 6 interchange along I-25.

1.6 Adjacent Transportation Projects

The Project was developed as part of the on-going regional and local transportation planning process, and as such, considered related transportation projects and plans. The Project is independent from but complements these efforts.

There are several transportation projects underway in the vicinity of the Project area, as shown in Table 3. The project at I-25 and Santa Fe Drive was selected for implementation with the 2007 ROD (the I-25/Alameda Avenue project was also selected with the 2007 ROD, and has already been constructed).

Table 3: Current Transportation Projects within the Project Area

Project Name	Description	Completion Date
CDOT US 6 over Sheridan Boulevard Bridge Replacement	Bridge replacement	September 2013
CDOT Federal Boulevard from Alameda Avenue to 6 th Avenue	Reconstruction and widening of Federal Boulevard to include three lanes in each direction, a raised median, and wider sidewalks; traffic signal replacement	January 2013
CDOT I-25 and Santa Fe Drive	Bridge replacements, new flyover ramp, and reconstruction and realignment of I-25 from the Broadway viaduct to just south of Alameda Avenue	July 2013
RTD FasTracks West Corridor LRT	Light Rail Transit from Downtown Denver to Golden running parallel to the Project to north through Lakewood Dry Gulch	April 2013

Source: CDOT, RTD

Many plans and projects related to the Project area have been completed. Construction is ongoing for the reconstruction of Federal Boulevard between Alameda and 6th Avenues. The only other planned project that affects the Project is the 2009 Federal Boulevard (5th Avenue to Howard Place) Planning and Environmental Linkages (PEL) Study. The City and County of Denver (CCD) evaluated transportation improvements along Federal Boulevard for a study area that spanned US 6. The proposed action called for a future Federal Boulevard with three SB through lanes, three NB through lanes, and a 16-ft raised median with a left turn lane at the 5th Avenue, 6th Avenue on- and off-ramps, and the 7th Avenue, 8th Avenue, 9th Avenue, 10th Avenue, 11th Avenue, 12th Avenue, and Holden Place intersections.

The Project is consistent with the 2009 Federal Boulevard PEL proposal and the current CDOT Federal Boulevard from Alameda Avenue to 6th Avenue construction project by including three NB and three SB through lanes on Federal Boulevard.

2 Alternatives Considered

This section provides details about the alternatives considered in the I-25 Valley Highway Environmental Impact Statement (EIS), as well as the current Selected Alternative. The I-25 Valley Highway EIS process commenced with the publication of the Notice of Intent to prepare an EIS in the Federal Register on July 23, 2002. In April 2005, the Draft EIS (DEIS) was made available for public review and comment, with a Notice of Availability published in the Federal Register on April 29, 2005. An informational meeting and a public hearing were held during the DEIS comment period, which ended on June 14, 2005.

The FEIS was made available for public review and comment in November 2006, with a Notice of Availability published in the Federal Register on November 17, 2006. A public hearing for the FEIS was held on November 30, 2006, and the public comment period ended on December 18, 2006.

To meet the purpose of the I-25 Valley Highway Project, as described in Section 1.3, several alternatives were considered throughout the DEIS and FEIS.

2.1 Alternatives Evaluated in the Draft EIS

Chapter 2 of the DEIS described the process that was used to develop, evaluate, and eliminate or advance potential alternatives to meet the purpose and need for the project. A No Action Alternative and the following three System Alternatives were considered in detail in the DEIS:

No Action Alternative – The No Action Alternative includes only those projects that have committed funds for improvements. This includes the Transportation Expansion Project (T-REX) and the Broadway Viaduct Replacement Project, which have now been completed. The No Action Alternative was fully evaluated in the EIS and serves as a “baseline” against which other alternatives are compared.

System Alternative 1 – Maximize Use of Existing Right-of-Way (ROW) – System Alternative 1 is a combination of roadway improvements that provide the narrowest roadway width or/and had the least footprint, or were closest to the current configurations. System Alternative 1 would include widening of I-25 to provide a consistent section with four through lanes plus auxiliary lanes in each direction through the project area (common to all system alternatives), a tight diamond interchange at I-25 and Broadway with NB left as existing, a single point urban interchange with a flyover ramp for NB Santa Fe Drive to NB I-25 (common to all system alternatives), an offset partial urban interchange at I-25 and Alameda Avenue, Santa Fe Drive and Kalamath Street grade separated under the railroad close to their current alignments, ramp improvements at the I-25/US 6 interchange, and relocation of the US 6 and Bryant Street interchange to align with Decatur Street.

System Alternative 2 – Maximize Operation Performance/Safety – System Alternative 2 is a combination of roadway improvements that provide the most direct travel route, best avoid friction between traffic streams, or reduce traffic signals. System Alternative 2 would include widening of I-25 to provide a consistent section with four through lanes plus auxiliary lanes in each direction through the project area (common to all system alternatives), a diamond interchange at I-25 and Broadway with the SB on-ramp grade separated, a single point urban interchange with a flyover ramp for NB Santa Fe Drive to NB I-25 (common to all system alternatives), a half diamond interchange at I-25 and Alameda Avenue with Santa

Fe and Kalamath grade separated over Alameda, Santa Fe Drive and Kalamath Street grade separated under the railroad close to their current alignments, ramp improvements at the I-25/US 6 interchange, closure of the Bryant Street interchange, a diamond interchange at US 6/ Federal Boulevard with slip ramps to Bryant Street and a braided ramp from Federal Boulevard to EB US 6, and reconstruction of US 6 with collector-distributor roads/auxiliary lanes through the project area.

System Alternative 3 – Maximize Facilitation of Local Objectives – System Alternative 3 is a combination of roadway improvements that attempt to enhance the local street systems operations as well as to best meet local land use and community value goals. System Alternative 3 does not necessarily represent the CCD’s preferred alternative, but rather includes a number of improvements suggested by the CCD to be evaluated through the EIS process. System Alternative 3 would include widening of I-25 to provide a consistent section with four through lanes plus auxiliary lanes in each direction through the project area (common to all system alternatives), a tight diamond interchange at I-25 and Broadway, a single point urban interchange with a flyover ramp for NB Santa Fe Drive to NB I-25 (common to all system alternatives), an offset partial urban interchange at I-25 and Alameda Avenue with Santa Fe and Kalamath grade separated under Alameda, Santa Fe Drive and Kalamath Street grade separated under the railroad, ramp improvements at the I-25/US 6 interchange, closure of the Bryant Street interchange, and a single point urban interchange at US 6 and Federal Boulevard.

These alternatives were fully evaluated in the DEIS with regard to transportation benefits and environmental considerations. These system alternatives were established on the basis of a multistage screening process, which considered 80 different element alternatives. The alternative development and screening process is described in detail in the FEIS.

2.2 Alternatives Evaluated in the FEIS

For the FEIS, FHWA and CDOT identified a Preferred Alternative that combines elements of the three System Alternatives that were analyzed in the DEIS. The Preferred Alternative did not represent a new alternative, but rather combined elements of System Alternatives 1, 2, and 3 with refinement based in the analysis contained in the DEIS and comments received from the public and agencies.

The Preferred Alternative was documented in the FEIS and was compared with System Alternatives 1, 2, 3 and the No Action Alternative, which were carried through from the DEIS. Each of these alternatives was fully evaluated in the DEIS with regard to transportation benefits and environmental considerations.

2.3 FEIS Preferred Alternative

The FEIS Preferred Alternative includes the following major elements, shown in Figures 4 and 5:

- **I-25 Mainline:** Widening of I-25 to provide a consistent section with four through lanes plus auxiliary lanes in each direction through the project area (these improvements were common to System Alternatives 1, 2, and 3 in the DEIS)
- **I-25/Broadway:** Tight diamond interchange (these improvements were included in System Alternative 3 in the DEIS)
- **I-25/Santa Fe Drive:** Single point urban interchange with a flyover ramp for NB Santa Fe Drive to NB I-25 (these improvements were common to System Alternatives 1, 2, and 3 in the DEIS)
- **I-25/Alameda/Santa Fe/Kalamath:** Offset partial urban interchange at I-25 and Alameda Avenue with Santa Fe Drive and Kalamath Street grade separated under the railroad close to their current alignments (this combination of improvements was included in System Alternative 1 in the DEIS)
- **US 6:** Ramp improvements at the I-25/US 6 interchange; closure of the Bryant Street interchange; diamond interchange at US 6/Federal Boulevard with slip ramps to Bryant Street and a braided ramp from Federal Boulevard to EB US 6; reconstruction of US 6 with collector-distributor roads/auxiliary lanes through the project area (these improvements were included in System Alternative 2 in the DEIS)

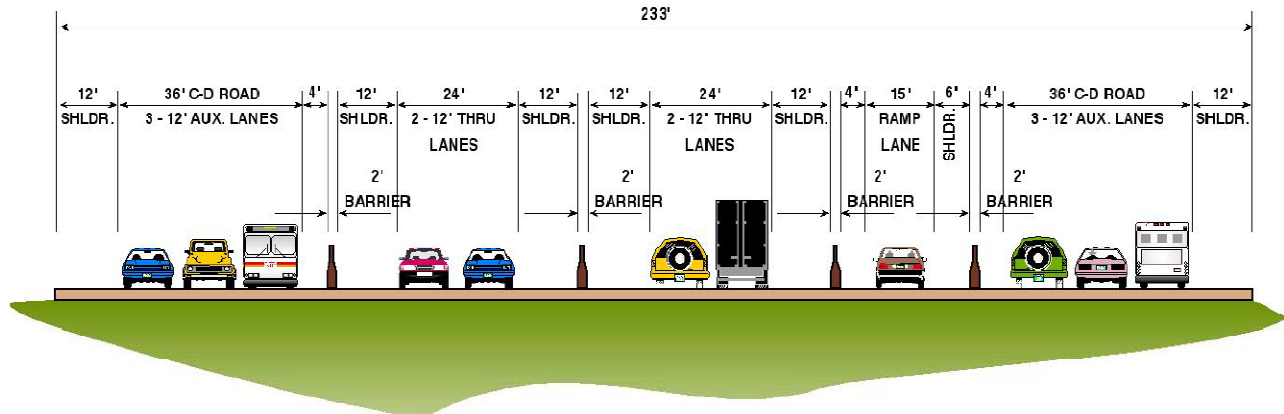


Figure 4: US 6 Typical Section, Preferred Alternative, Looking East

(source: I-25 Valley Highway FEIS)

(Section applies to US 6 between Federal Boulevard and I-25)

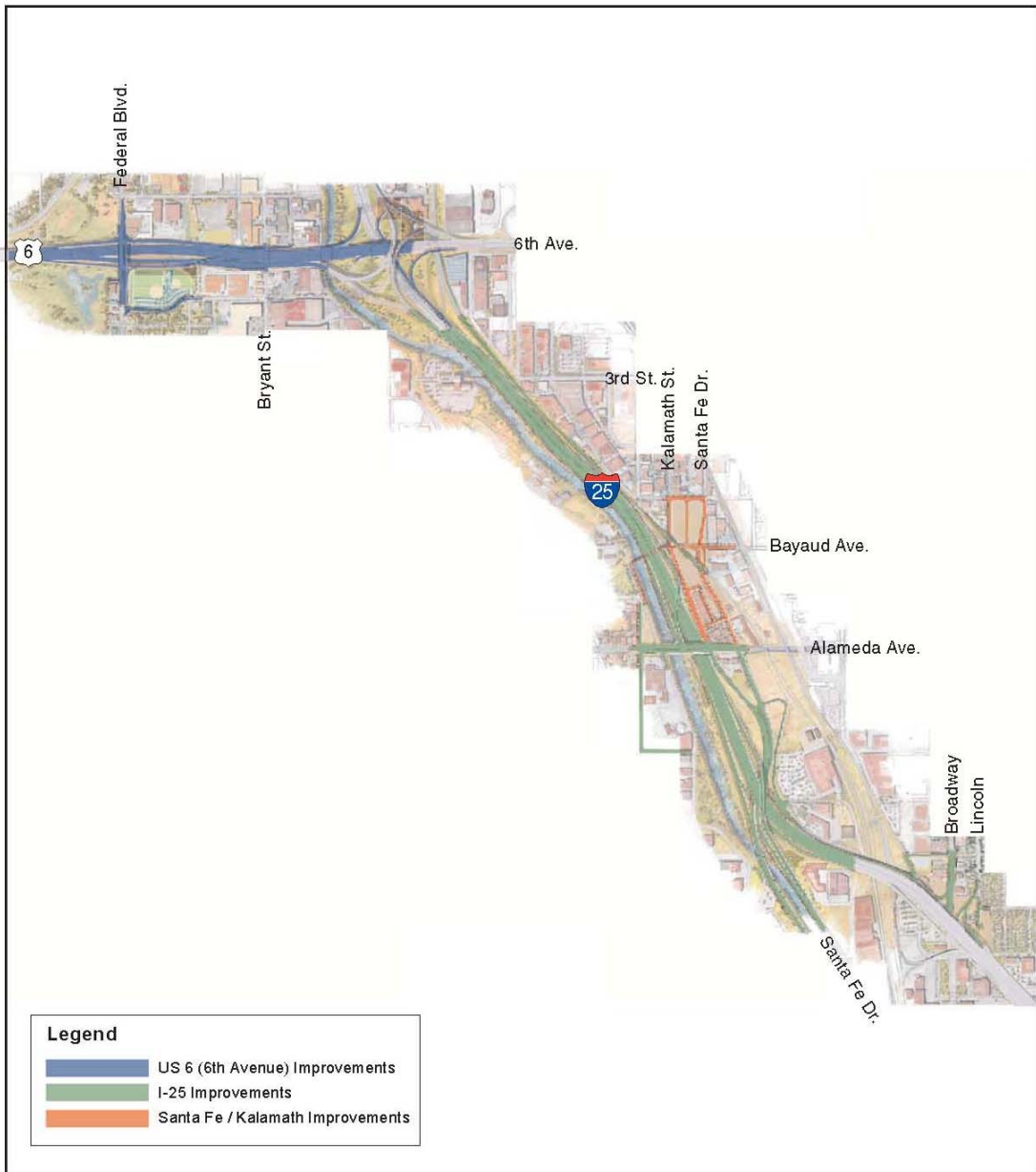


Figure 5: I-25 Valley Highway Project Preferred Alternative
(source: I-25 Valley Highway FEIS)

As discussed in the FEIS, the Preferred Alternative balances transportation improvements with social and environmental considerations. FHWA and CDOT concluded that the Preferred Alternative:

- Meets the project purpose and need
- Is feasible to build
- Does not restrict consideration of alternatives for other reasonably foreseeable transportation improvements
- Meets the long-term vision
- Meets the needs or objectives of social, economic and environmental concerns
- Is the Environmentally Preferable Alternative in accordance with CEQ
- Is the Least Environmentally Damaging Practicable Alternative in accordance with Clean Water Act (CWA) Guidelines [404(b)(1)]
- Best avoids and/or minimizes harm to Section 4(f) properties
- Has general public acceptance

2.4 2007 ROD and Phased Implementation

At the time of the FEIS, funding limitations prevented the approval of the entire Preferred Alternative. These funding limitations made it difficult to predict the timing of future phases; therefore, measures were taken to ensure the independent utility of approved phases. Additionally, it had to be demonstrated that air quality conformity would not be jeopardized, and that any mitigation measures were to be implemented with the phase in which the impacts occur, rather than deferred to a later phase.

Phased implementation is typically detailed during final design. However, the requirements of fiscal constraint must be satisfied for FHWA to approve a ROD. Because, at the time of the 2007 ROD, the fiscally-constrained RTP did not contain the entire Preferred Alternative for the FEIS, FHWA and CDOT determined that it was appropriate to identify a phased project implementation process within the NEPA process. With this approach, additional detail was provided regarding phasing, as an enhancement to the typical NEPA process. Chapter 7 of the FEIS discusses the phased implementation in detail.

FHWA and CDOT identified a set of criteria to be used as guidelines in establishing logical project phases including:

- **Independent utility/logical termini** – each phase should have independent utility and logical termini to the extent that the phase provides a functional transportation system even in the absence of other phases
- **Elements of purpose and need** – each phase should contribute to meeting the purpose and need for the entire project
- **Environmental impacts** – individual phases should avoid the introduction of substantial additional environmental impacts that cannot be mitigated
- **Mitigation paired with impacts** – each phase should include appropriate mitigation measures to match the environmental impacts of that phase

- **Fiscal constraint** – any phase selected in a ROD must meet the requirements of fiscal constraint, demonstrated by inclusion in the RTP
- **Air quality conformity** – any phase selected in a ROD must meet the requirements of air quality conformity, as established by inclusion in a conforming RTP or Transportation Improvement Program (TIP)

Of these criteria, the first two were considered key in establishing meaningful project phases that work toward meeting the overall corridor needs. A series of logical phases was established based on a balance of the criteria listed above. In addition to these criteria, logical sequencing of phases in terms of constructability and operation was considered and a general priority of needs was applied, with system reliability and safety as the top priority, followed by lane continuity on I-25. The phases are shown in Table 4.

Based on this analysis, the 2007 ROD selected two Phases (1 and 2) for implementation. A portion of Phase 1 (I-25/Santa Fe Drive) is currently under construction, and construction of Phase 2 (I-25/Alameda Avenue) was recently completed. Four future phases (Phases 3-6) were identified but were not selected in the 2007 ROD. The order of these future phases in Table 3 is indicative of the order of priority at the time of the 2007 ROD. The 2007 ROD noted that priorities for future phases may change, especially with regard to how phases may fit with future funding amounts.

Table 4: Project Phases and Priorities as Presented in 2007 ROD

Phase	Phase Package Description	Sequencing Restrictions
<i>Phases Selected for Implementation in 2007 ROD</i>		
1 Most critical on I-25	I-25/Santa Fe Interchange with Lane Continuity through Alameda	None
1 Most critical on US 6	US 6/Federal Bridge and Ramps, excluding Braided Ramp and West Side US 6/Federal Ramps	None
2 Most critical on I-25	I-25/Alameda Interchange and Alameda Bridge over South Platte	Must follow or be concurrent with I-25/Santa Fe Interchange
<i>Phases not Selected in 2007 ROD – to be Implemented when Funding Becomes Available</i>		
3	I-25 Mainline Widening from Alameda to US 6	Must follow or be concurrent with I-25/Alameda Interchange
4	Santa Fe/Kalamath CML Railroad Grade Separation	Must follow I-25/Alameda Interchange. Must follow or be concurrent with I-25 Mainline Widening from Alameda to US 6
5	US 6 from Federal to I-25 with Braided Ramp	Must follow US 6/Federal Bridge and Ramps excluding Braided Ramp
6	I-25/Broadway Interchange	None

2.5 Selected Alternative: ROD2

Since the 2007 ROD, additional funding has become available for transportation improvements, enabling FHWA and CDOT to work toward implementation of another portion of the FEIS Preferred Alternative. CDOT decided to move forward with the remaining portion of Phase 1 (the portion at US 6/Federal Boulevard, which was not included in the current construction project at I-25/Santa Fe Drive), Phase 5, and new, minor project elements. Section 1.2 of the ROD2 describes the Selected Alternative, also called the Project.

Table 1 in Section 1.3 shows how the Selected Alternative will address Project objectives. The environmental consequences of the Selected Alternative and the resulting mitigation measures to be implemented are presented in Sections 3, 4, and 5.

2.5.1 Design Refinements

As part of the design/build process, the Project has progressed to a preliminary level of engineering design, and refinements to the FEIS and 2007 ROD Preferred Alternative have been made.

Federal Boulevard. The FEIS Preferred Alternative called for two NB and three SB lanes along Federal Boulevard. The current Project includes a six-lane section along with a median island as a result of coordination with CCD and to match the proposal from the 2009 Federal Boulevard PEL Study and the current Federal Boulevard from Alameda Avenue to 6th Avenue construction project.

Barnum Park East. To mitigate Section 4(f) impacts, Barnum Park East will be reconstructed. This was included as mitigation in the FEIS and 2007 ROD. Since then, the design of the Federal Boulevard ramp has been changed to minimize the footprint of park impacts.

I-25 ramps. The Project includes the reconstruction of the three I-25 ramps included in the FEIS Preferred Alternative. The design of the ramps has slightly changed due to vertical alignment changes at the I-25 bridge. These changes do not affect traffic operations or functionality of the ramps.

New Project Elements. As previously discussed, new, minor project elements have been added since the FEIS and 2007 ROD. In some cases, such as the bicycle/pedestrian bridge, the new elements are a result of interagency coordination and mitigation. The pavement resurfacing from Knox Court to Sheridan Boulevard was added to the project to provide consistency and fill in a gap between the current construction at Sheridan Boulevard and the Project. The replacement of the US 6 bridges over Bryant Street, I-25, and the BNSF Railway were added to replace structurally deficient or functionally obsolete structures and to adequately tie into new US 6 and ramp alignments. The reconstruction of the SB I-25 to EB US 6 ramp was added because the vertical alignment changes to the I-25 bridge required ramp reconstruction.

In addition to these identified refinements, more changes could be made by the design/build Contractor during the final design process. If design changes result in a change to the area impacted or to the degree of impacts, CDOT shall prepare a Reevaluation of ROD2 to determine what level of additional analysis and mitigation is required. CDOT shall coordinate with FHWA to complete the Reevaluation and

any required NEPA documentation. The Contractor will be required to obtain final approval for design exceptions from CDOT and FHWA prior to construction.

2.5.2 Transportation Management Elements

The Preferred Alternative in the FEIS and Selected Alternative in the 2007 ROD included transportation management elements. FHWA and CDOT have identified transportation management elements that they intend to implement as part of the Project, shown in Table 5.

Table 5: Transportation Management Elements of the Project

Transportation Management Category	Specific Elements	Implementation
Improved bicycle/pedestrian crossing of US 6	Improved bicycle/pedestrian accommodations over US 6	This new bicycle/pedestrian bridge is included in the Project
Improved bicycle/pedestrian access to transit facilities	Improved sidewalks on Federal Boulevard	Widened sidewalks along Federal Boulevard, consistent with CCD standards are included in the Project
Improved bicycle/pedestrian access to transit facilities	Longer bridge to accommodate a wider Bryant Street including improved sidewalks as well as room to accommodate bike lanes in the future	The US 6 bridge over Bryant Street will be constructed as part of the Project to accommodate improved sidewalks and future bike lanes
Spot intersection improvements that are directly related to I-25 and US 6 corridor improvements	Improvements to US 6/Bryant Street, and US 6/Federal Boulevard ramp terminal intersections	Intersection improvements such as new traffic signals are included in the Project
Intelligent Transportation System (ITS) Measures	Maintaining the existing fiber optic system for freeway ramp metering and cameras for network surveillance, variable messaging sign at NB I-25 in advance of US 6 for traffic information dissemination, and incident management	Implement with the Project, in conjunction with regional ITS programs
Travel demand management measures during project construction	Variable message sign (VMS) use for incident management, supplementary VMS displaying alternate routing	Specific strategies will be considered during final design and will be tailored to the schedules and needs for the Project

2.6 Environmentally Preferred Alternative

Based on the analysis presented in the FEIS, the Preferred Alternative is the Least Environmentally Damaging Alternative that meets the purpose and need for the project. The Selected Alternative in ROD2 includes a portion of the Preferred Alternative, and is the environmentally preferred alternative for the portion of the project that it addresses.

3 Environmental Resources

The ROD2 process for the Project considered and evaluated a number of environmental resources. The evaluation of these resources, including environmental consequences and mitigation measures to be implemented, is presented in the following portions of this document:

- Appendix A, which contains the Reevaluation Form (CDOT Form #1399). Appendix A summarizes the environment setting, the affected environment, and the environmental impact assessment for each resource. Table 6 shows a summary of the changes for each resource subsequent to the FEIS and 2007 ROD.
- Appendix C, which contains the CDOT Mitigation Tracking Form.
- Appendices D through N, which are the technical reports and memoranda for the environmental resources prepared to support this ROD2. The appendices contain additional information about each resource, including how its impacts and mitigation measures have changed since the FEIS and 2007 ROD.
- This section of the ROD2, which highlights eight resource areas that potentially affect the decision for this ROD2: air quality; wetlands, waters of the US, and open water; vegetation and wildlife; historic and archeological preservation; Section 4(f); Section 6(f); hazardous materials; and traffic and transportation management.

Table 6: Summary of Environmental Resource Reevaluation

Setting/Resource/Circumstance	Change in Affected Environment or Setting		Change in Environmental Impact	
	Yes	No	Yes	No
Air Quality	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Geologic Resources and Soils	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Water Quality	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Floodplains	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Wetlands/Waters of U.S.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Vegetation and Noxious Weeds	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Fish and Wildlife	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Threatened/Endangered Species	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Historic Resource (includes bridges)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Archaeological Resources	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Paleontological Resources	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Land Use	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Social Resources	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Economic Resources	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Environmental Justice	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Residential/Business Right-of-Way Impacts	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Transportation Resources (roadway, rail, bus, bike, pedestrian, etc.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Utilities and Railroads	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Section 4(f)/6(f)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Farmlands	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Noise	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Visual Resources/Aesthetics	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Energy	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Hazardous Materials	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Cumulative Impacts	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other(s)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

3.1 Air Quality

An air quality analysis was conducted to estimate the changes of emission levels under the 2035 No Build (without the Project) and 2035 Build (with the Project) scenarios and to assess whether impacts of these changes could cause or exacerbate a violation of the National Ambient Air Quality Standards (NAAQS) for carbon monoxide (CO). As determined through interagency consultation, the following additional analyses were conducted: a qualitative analysis of particulate matter smaller than 10 microns in diameter (PM₁₀) and a mobile source air toxics (MSAT) analysis. The major air quality findings are that the Project:

- Will not cause or exacerbate an exceedance of an air quality standard
- Meets air quality conformity requirements
- Minimizes temporary increases in air emissions during construction

Of the seven criteria pollutants, CO and PM₁₀ are considered as pollutants of interest for the Project.

3.1.1 Regulatory Changes

The following regulatory changes have taken effect since the FEIS and 2007 ROD:

- 2007: US Environmental Protection Agency (EPA) rule on the Control of Hazardous Air Pollutants from Mobile Sources (Federal Register, Vol. 72, No. 37, page 8430, February 26, 2007)
- 2008: EPA designated the Denver/North Front Range region as nonattainment for the 8-hour ozone (O₃) standard
- 2008: EPA modified NAAQS for PM₁₀
- 2009: New PM_{2.5}/10 Guidance from FHWA/EPA
- 2010: New EPA regulation from May 2004 called “Clean Air Nonroad Diesel Rule” calling for the use of ultra-low sulfur diesel for most non-road diesel equipment, including construction equipment, beginning in 2010

3.1.2 Regional Air Quality Conformity for the Project

The Project is located in an area that is designated as nonattainment for O₃ and maintenance area for CO and PM₁₀, and therefore a conformity determination is required. The US 6 intersection improvement at Federal Boulevard is listed in the fiscally constrained 2035 RTP which was adopted in February 2011, and complies with the applicable Denver-area O₃ SIP.

There have been no changes to the Project with regards to lane configurations, other than the widening of Federal Boulevard from five to six lanes. This roadway widening, which adds one lane of capacity between 5th and 7th Avenues, is included in the 2012-2017 TIP and the Cycle 1 Amendments to the 2035 RTP, as noted in the July 21, 2011 letter from CDPHE (included in Appendix B).

The Project is fully funded in the current 2012-2017 Metropolitan TIP and the Statewide Transportation Improvement Program (STIP). In addition, it has been determined that through regional level modeling and long range planning analysis that this project:

- Will not cause or exacerbate a violation of a CO standard
- Is not of air quality concern for PM₁₀ and is not expected to create or worsen a PM₁₀ violation
- In nearly all cases, MSAT emissions will likely be lower than present levels in 2035 as a result of EPA’s national control programs. In cases where MSAT emissions will be higher, the increases are not significant. MSAT emissions in the study area would be less in 2035 with the Project than under future No Build condition for all MSAT pollutants. Traffic volumes and specifically the truck volumes and percentage of trucks at the sensitive areas affected by the Project will be less than under future No Build scenario.

Therefore, this Project complies with the Regional conformity requirements established by the Clean Air Act.

3.1.3 Local Air Quality Conformity

Interagency consultation determined that updated microscale conformity modeling for CO would be required at the Federal Boulevard interchange area, including 5th Avenue. Dispersion analysis resulted in CO concentrations below the NAAQS.

A PM₁₀ hot-spot analysis is required when a new transportation project with significant diesel traffic is proposed, including a quantitative PM₁₀ analysis when the project is considered to be of air quality concern. Table 6 shows the comparison of truck traffic projections between the Existing Condition, the No Build condition, and the Project, using data from the Transportation Analysis Technical Report (Appendix L). With the Project, truck traffic will be redistributed due to changes in access at the Federal Boulevard to EB US 6 ramp and the US 6 ramps to Bryant Street; trucks will use the new braided ramp to access US 6 and Bryant Street, and circulate on local streets to access other destinations. As Table 7 shows, the Project reduces the volume of trucks circulating at the EB US 6 ramp to Bryant Street as compared to the 2035 No Build. The Project reduces the morning (AM) peak hour volume of trucks circulating at the 5th Avenue/Federal Boulevard intersection as compared to the 2035 No Build. Additionally, the volume of trucks circulating at these two locations with the Project is less than with the 2035 No Build, during all documented time periods. Due to these decreases, a PM₁₀ hot-spot analysis was not required for the Project.

Table 7: Comparison of Truck Traffic Projections

Location	2011 Existing Number of Trucks			2035 No-Build Number of Trucks / Percent Change from Existing			2035 Project Number of Trucks / Percent Change from Existing		
	AM Peak	PM Peak	Mid-day Peak Hour	AM Peak	PM Peak	Mid-day Peak Hour	AM Peak	PM Peak	Mid-day Peak Hour
	EB US 6 Off Ramp to Bryant Street*	42	42	47	66 / 57%	66 / 57%	74 / 57%	11 / (74)%	11 / (74)%
5 th at Federal Ingress and Egress from 5th	190	98	144	383 / 101%	261 / 160%	322 / 123%	147 / (23)%	171 / 75%	159 / 10%

Note: Shaded numbers have decreased

*2035 Project access will be provided via a slip ramp, part of the US 6/Federal Boulevard braided ramp, and not directly from US 6.

Interagency consultation resulted in concurrence that the Project is expected to minimally affect truck operations on the affected roadways and that the truck volumes on the roadways affected by the project are less than volumes that would be considered as significant. Following guidance set forth in 40 CFR 93.123(b)(1)(i), the Colorado Department of Public Health and Environment (CDPHE), Air Pollution Control Division, EPA and FHWA determined on August 22, 2012 that the Project is not considered a project of air quality concern regarding PM₁₀ emissions. In addition, the project has demonstrated local and regional air quality conformity requirements with the SIP.

3.1.4 Impacts and Mitigation

CDOT and FHWA have concluded the construction of the Project will not create long-term regional or local air quality impacts, and the Project has demonstrated local and regional air quality conformity. No mitigation was required for the operational phase of the 2007 ROD, and the same is true for this ROD2.

Temporary air quality impacts during construction will be mitigated for through best management practices (BMPs), as included in Appendix C.

3.2 Wetlands, Waters of the US, and Open Water

The FEIS and 2007 ROD identified that direct impacts to wetlands and other waters of the US associated with the system alternatives would result from construction on existing or new bridges over the South Platte River, from stormwater drainage outfalls to the South Platte River, and from roadway and interchange reconfiguration. More definitive estimates of temporary and permanent impacts to wetlands will be made during final design and permitting.

A new wetland was delineated north of the US 6 structures over the South Platte River during field work conducted in 2012. A jurisdictional wetland area, 100 square feet (sf), has the potential to be impacted as a result of the Project. FHWA and CDOT policy requires compensatory mitigation for permanent impacts to both jurisdictional and non-jurisdictional wetlands. Permanent impacts to wetlands are less than 0.10 acres; therefore, a Functional Assessment for Colorado Wetlands (FACWet) analysis is not required. The Project will permanently impact less than 500 sf of wetlands, such that a Wetland Finding is not required. Mitigation for wetland impacts is listed in Table 14.

3.3 Vegetation and Wildlife

3.3.1 Threatened/Endangered Species

Since the FEIS and 2007 ROD, a US Fish and Wildlife Service (USFWS) Block Clearance Zone (2008) was established for Ute ladies tresses orchid, Preble's meadow jumping mouse and the Colorado butterfly plant. The Project area falls completely within this Block Clearance Zone; therefore, no additional coordination was required. No suitable habitat for any federally listed threatened or endangered species occurs within the Project area. No project-specific mitigation for threatened or endangered species is required.

Also, since the FEIS and 2007 ROD, there is a potential for depletion of the South Platte River which may result in an impact to the following federally listed threatened or endangered species: Least Tern, pallid sturgeon, Piping Plover, western prairie fringe orchid, and the Whooping Crane. Impacts to these species as a result of a depletion of the South Platte River are addressed by the April 24, 2012 Biological Opinion issued by the USFWS addressing depletions and impacts to those species.

3.3.2 State Sensitive Species

Impacts to state sensitive species were not previously discussed in the FEIS and 2007 ROD. There will be minor impacts to the northern leopard frog and the common garter snake. Impacts to habitat to the northern leopard frog and the common garter snake will be mitigated by erosion control to keep sediment out of the South Platte River during construction and 1:1 replacement of all Senate Bill 40 vegetation. Measures will be outlined in provisions of the SB 40 Wildlife Certification and BMPs associated with the CWA 404 Permit.

3.4 Historic and Archeological Preservation

A new Area of Potential Effect (APE) was developed in coordination with the State Historic Preservation Office (SHPO) and revised as the project limits were further defined.

There have been no systemic regulatory changes to the Section 106 process between the FEIS, 2007 ROD, and this reevaluation. New historical resources were identified due to the maturation of their age to over 50 years between 2007 and 2012.

On August 23, 2012, SHPO provided a finding of concurrence with CDOT's cultural analysis findings. One historically significant resource was identified: a portion of the West and Southside Interceptor, brick-lined sewer (herein referred to as the West and Southside Interceptor Sewer). A portion of the resource will be removed and replaced by concrete piping as a result of the replacement of the US 6 bridge over the South Platte River. The West and Southside Interceptor Sewer segment composes a small portion (0.10 percent) of a seven mile stretch of historically-significant functioning brick sewer. CDOT has determined and SHPO concurred that the removal of this segment can be considered an *adverse effect*. CDOT, FHWA, SHPO, CCD, and Metro Wastewater have agreed to develop a Denver brick-lined sewers Programmatic Agreement (PA) which will provide for mitigation of this adverse effect and will apply to the entire seven mile stretch of sewer. The PA will be completed prior to construction, and will include the development of a report on the history of Denver's brick sewers. Mitigation for this resource will be handled through this separate PA and with SHPO's concurrence.

FHWA has evaluated the adverse effects to the West and Southside Interceptor Sewer as part of the programmatic Section 4(f) Evaluation and Approval for Transportation Projects That Have a Net Benefit to a Section 4(f) Property. As such, impacts and mitigation associated with this resource are also discussed in Section 3.5.

CDOT coordinated with the SHPO regarding the Section 106 review of the Project's APE, eligibility determinations and final determinations of effect (see Agency Correspondence in Appendix B).

3.5 Section 4(f) Properties

A Final Section 4(f) Evaluation was included in the FEIS and 2007 ROD. Appendix K of ROD2 updates that Section 4(f) Evaluation; this section of ROD2 summarizes the findings.

The parks and recreational Section 4(f) resources within the Project area are listed in Table 8. All of these facilities are owned and maintained by the CCD. The historic Section 4(f) resource, the West and Southside Interceptor Sewer, was identified in Section 3.4. Figure 6 shows the locations of historic and non-historic Section 4(f) resources in the Project area.

Table 8: Park and Recreation Resources

Park or Recreation Resource	Year Acquired/ Established	Size (acres)	Facilities
Barnum Park South	1906	35.6	Basketball court, drinking fountain, flower garden, fishing lake, outdoor swimming pool, playground, picnic tables/shelter, recreation center, restroom, soccer field, tennis court, bike/pedestrian path
Barnum Park North	1937	11.8	Lighted softball fields, bleachers, bike/pedestrian path, bike skills course*
Barnum Park East	1951	13.6	Soccer field, lighted softball field, drinking fountain, restroom
Frog Hollow Park	1976	4.0	Paved bike/pedestrian trail, drinking fountain, fishing, picnic tables
South Platte River Trail	1980	19 miles	Paved bike/pedestrian trail
Milstein Park	1980	5.0	Paved bike/pedestrian trail, fishing, picnic tables

Source: CCD, Department of Parks and Recreation, 2003

*This facility was added in the southwest corner of the park after approval of the FEIS and 2007 ROD.

The FEIS identified direct and indirect uses of all phases of the Preferred Alternative on publicly owned parkland and recreation resources, which are afforded protection under Section 4(f). The FEIS addressed all elements of a Section 4(f) analysis including an evaluation of avoidance alternatives and measures to minimize harm. The avoidance alternatives included widening US 6 without park encroachments and locating the proposed improvements elsewhere in the study area.

The FEIS and 2007 ROD documented Section 4(f) uses in three parks under the Preferred Alternative: Barnum Park South, Barnum Park East, and Barnum Park North. The FEIS concluded that there were no prudent or feasible alternatives to the use of the three aforementioned Section 4(f) properties, and that the Preferred Alternative included all possible planning to minimize harm to these properties. The 2007 ROD reaffirmed FHWA's FEIS determination.

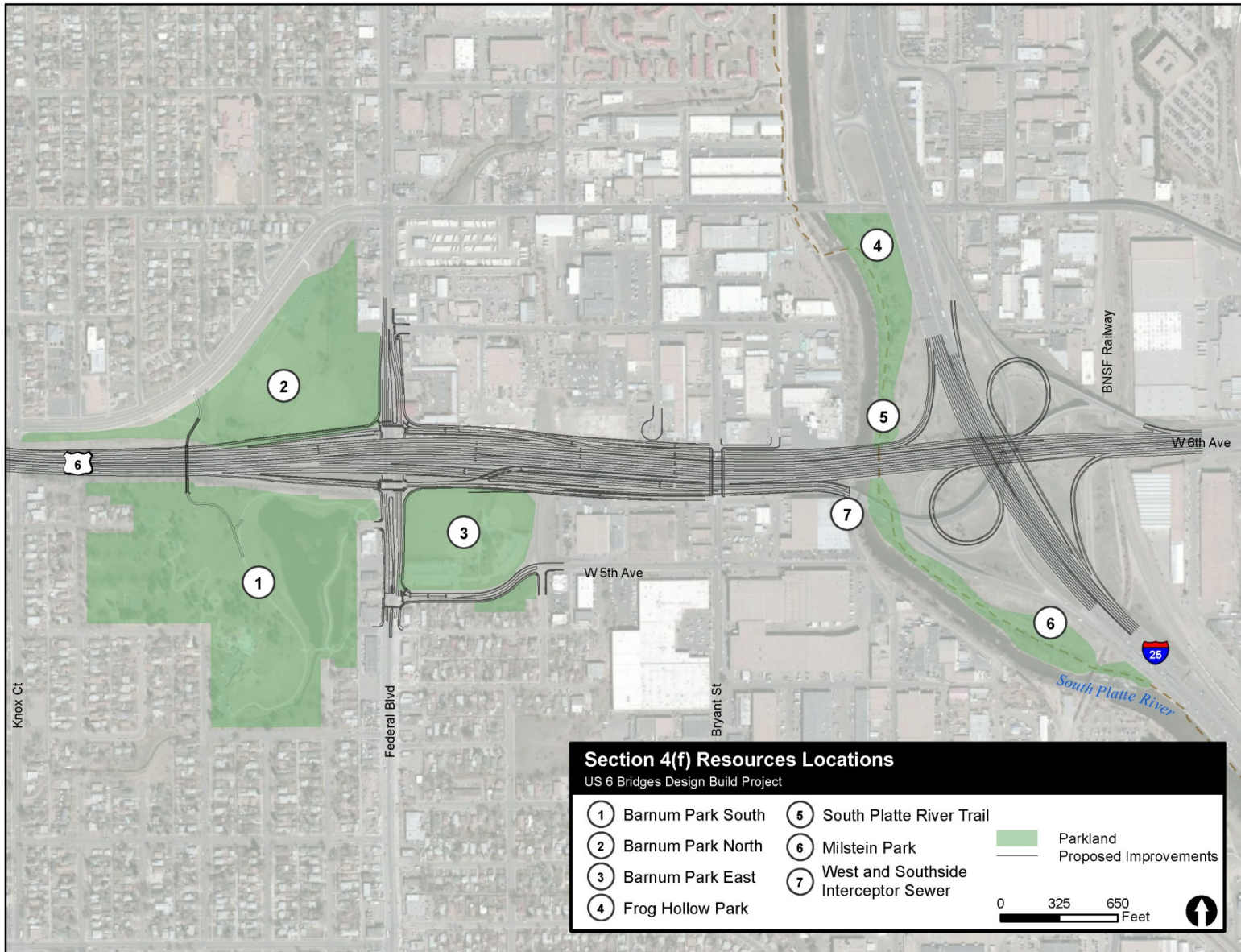


Figure 6: Section 4(f) Resource Locations

The Project has Section 4(f) impacts that are different from the FEIS Preferred Alternative because of design refinements made since the FEIS and 2007 ROD. Two parks (Barnum Park North and Barnum Park East) and one historic resource (West and Southside Interceptor Sewer, which is described in Sections 3.4 and 3.5.5) are subject to a Section 4(f) use with implementation of the Project.

Table 9 shows the Section 4(f) uses due to the Project as compared to the Preferred Alternative in the 2007 ROD. The FEIS contains the Section 4(f) Evaluation, but the 2007 ROD clarifies and updates the impacts and mitigation measure for Barnum Park North and Barnum Park East.

Table 9: Section 4(f) Use Comparison

Section 4(f) Resource	Use by 2007 ROD Preferred Alternative (acres)	Use by Project (acres)
Barnum Park South	0.01	No use (temporary occupancy)
Barnum Park North	0.42	0.63
Barnum Park East	2.1	1.64
Frog Hollow Park	No use	No use
South Platte River Trail	No use (temporary occupancy)	No use (temporary occupancy)
Milstein Park	Not identified	No use
West and Southside Interceptor Sewer	Not identified	240 linear feet

Source: 2007 ROD, ROD2 Appendix K

3.5.1 Barnum Park South Impacts

The FEIS documented a small (0.01-acre) use of Barnum Park South under the Preferred Alternative due to the Federal Boulevard widening. The current Project has eliminated this impact by modifying the design of the Federal Boulevard interchange. However, there will be a temporary occupancy of the park during construction of the bicycle/pedestrian bridge.

3.5.2 Barnum Park North Impacts

In Barnum Park North, the FEIS identified small uses of parkland on the east side of the park (0.02-acre) associated with a redesigned WB on-ramp to US 6 from Federal Boulevard and on the south side of the park (0.03-acre) for the US 6 ramp. The 2007 ROD confirmed the use on the east side of the park, but the use on the south side increased to 0.4-acre.

The Project will convert 0.63-acres of Barnum Park North to transportation use as a result of a reconstructed WB Federal Boulevard to US 6 ramp and Federal Boulevard ROW widening. The improvement at this location is the same as in the FEIS and 2007 ROD, and those prior Section 4(f) analyses still apply. The change in impact area is the result of an updated ROW boundary for the park provided by CCD Department of Parks and Recreation, and is not due to roadway widening or design changes. As determined in the FEIS and 2007 ROD, there is no prudent and feasible alternative to the use of Barnum Park North; this finding still applies.

In addition to the 0.63-acre use, a 0.27-acre licensed access area associated with the maintenance of a retaining wall along the reconstructed ramp will be required. This area is not considered a use under Section 4(f).

3.5.3 Barnum Park East Impacts

The 2007 ROD documented a 2.1-acre use of Barnum Park East to transportation use. This would have occurred on the northern and western park edges due to the widening of Federal Boulevard and the new EB on-ramp from Federal Boulevard to US 6. The Project has a smaller impact (1.64-acres) because the footprint of the US 6/Federal Boulevard interchange has been compressed.

3.5.4 South Platte River Trail Impacts

The 2007 ROD documented a temporary occupancy of the South Platte River Trail during construction activities through detours, though it noted that the trail will ultimately be improved by the project. The 2007 ROD concluded that the temporary construction impacts to the South Platte River Trail would not constitute a use within the meaning of Section 4(f). Those findings are still valid for the Project. There will be a temporary trail detour in place during construction.

3.5.5 West and Southside Interceptor Sewer Impacts

Replacement of the US 6 bridge over the South Platte River will require removal of a segment of the West and Southside Interceptor Sewer, located west of the river. The West and Southside Interceptor Sewer is a Section 4(f) resource because it is a historic resource for which the SHPO found an adverse effect; this is discussed in more detail in Appendix I. The sewer was not identified as a historic or Section 4(f) resource in the FEIS or 2007 ROD. A segment of the sewer is shown in Figure 7.

A 240-foot portion of the seven-mile-long brick-lined sewer segment needs to be removed because it could sustain damage during construction due to pile driving and drilling. Preservation in place is not prudent due to potential damage. The sewer will be replaced with a new concrete pipe.

After CDOT and SHPO consultation and coordination, FHWA determined that the Project met the criteria for the Section 4(f) Evaluation and Approval for Transportation Projects That Have a Net Benefit to a Section 4(f) Property, and that there are no feasible and prudent alternatives to the relocation and reconstruction of the sanitary sewer. Correspondence between CDOT and SHPO regarding this determination can be found in Appendix B. Mitigation for this impact is discussed in Section 3.5.6.

3.5.6 Minimization of Harm to Barnum Park South, Barnum Park North, Barnum Park East, the South Platte River Trail, and the West and Southside Interceptor Sewer

When no prudent and feasible alternative exists, Section 4(f) requires that harm to the protected resources be minimized. During the FEIS and 2007 ROD processes, FHWA and CDOT worked with the CCD to identify appropriate measures to minimize harm. This coordination between the agencies has continued through the Project and ROD2 process, and is discussed in Section 3.5.7.

Table 10 shows the Section 4(f) mitigation measures for the Project relative to the ones included in the FEIS and 2007 ROD. The Section 4(f) mitigation measures proposed for the Project are similar to those cited in the FEIS and 2007 ROD, with additional measures to offset Section 4(f) uses. For the West and Southside Interceptor Sewer, CDOT has developed project-specific *Net Benefit to a Section 4(f) Property Programmatic* documentation, included in Appendix B. The city-wide PA for Denver brick-lined sewers, which will be used as the Project's planning to minimize harm and mitigation, is being developed

and will be completed prior to construction. Mitigation details and graphics for all resources can be found in Appendix K.

Because this is a design/build project, the final design and construction of the Project may result in adjustments that affect the area impacted or the improvements proposed within one or more of the park or recreation resource areas. If any adjustments are proposed, the design/build Contractor will be required to work with CDOT to secure an agreement from CCD Department of Parks and Recreation and approval from FHWA for any changed impacts and corresponding mitigation commitments. Book 2 Section 5.1.5 of the Project RFP describes the process whereby the Contractor, CDOT, and FHWA have specific roles and responsibilities.



Figure 7: West and Southside Interceptor Sewer

Table 10: Section 4(f) Mitigation Comparison

Section 4(f) Resource	Mitigation from Valley Highway Project FEIS/ROD	Mitigation for Project
All resources within Project limits	N/A	CDOT will be immediately notified for any Section 4(f) impacts greater than those anticipated in ROD2. If additional impacts than those already anticipated cannot be avoided, the Contractor will be responsible for all coordination and mitigation measures.
Barnum Park South*	Minimize acquisition by shifting Federal Boulevard widening to the east	<ul style="list-style-type: none"> • Ensure that all environmentally sensitive areas have clearly labeled "No Parking and No Staging Areas" on the final plan sheets • Replace landscaping that is damaged as a result of construction activities • Provide on-site public notices of construction activities
Barnum Park North	North of US 6, move Federal Boulevard widening to the east to avoid Barnum Park North.	<ul style="list-style-type: none"> • For any new or additional impacts, minimize acquisition by shifting Federal Boulevard widening to the east to avoid additional impacts to Barnum Park North. • Construction of a bicycle/pedestrian bridge over US 6 to connect Barnum Park North and Barnum Park South
	Relocate bicycle/pedestrian trail along the south side of the park	<ul style="list-style-type: none"> • Relocate trail north of its current location; replace fencing, turf and irrigation system; and provide all CDOT commitments included in the intergovernmental agreement (IGA) with CCD Parks and Recreation. • Reconfigure the trail near the tie-in to the new bicycle/pedestrian bridge landing to maintain existing and provide for new connectivity
Barnum Park East	Minimize size of interchange and ROW acquisition	Limit use to 1.64-acres
	CDOT to financially compensate CCD for ROW acquisition. Comply with the 2007 IGA between CDOT and CCD detailing the in-kind replacement of Barnum Park East facilities.	Comply with 2013 IGA between CDOT and CCD
Barnum Park East	Provide additional, new parkland along the east edge of the park by vacating the existing on-ramp to US 6 and acquiring a strip of land from an adjacent property owner. Add 0.5-acres to the east edge of the park.	Provide additional, new parkland along the east edge of the park by vacating the existing on-ramp to US 6 and acquiring a strip of land from an adjacent property owner. Add 0.4-acres to the east end of the park.**

Section 4(f) Resource	Mitigation from Valley Highway Project FEIS/ROD	Mitigation for Project
Barnum Park East	CCD to make arrangements to provide alternative play locations from permitted field users during seasons that will be disrupted by construction; CDOT to financially compensate CCD for costs associated with this effort.	CCD to make arrangements to provide alternative play locations from permitted field users during seasons that will be disrupted by construction; CDOT to financially compensate CCD for costs associated with this effort.
South Platte River Trail*	Provide detour for trail users	Contractor to provide mitigation during construction as defined in Book 2 Section 16.2.8 for the temporary use of the South Platte River Trail: <ul style="list-style-type: none"> • Existing trail systems, temporary trails, sidewalks, and pedestrian routes must be maintained at all times. An approved detour is included in Book 2 Section 16.2.8. • The Contractor shall meet all requirements of the Americans with Disabilities Act. • No trail closures shall be allowed from 5:00 a.m. to 8:00 p.m. any day of the week. • Temporary trail detours will be allowed under the following conditions: Public Information Plan requirements shall be identified and appropriate public notifications provided; the Contractor shall comply with CDOT's <i>Construction Detour Standards for Multi-Use Trails</i>.
West and Southside Interceptor Sewer	Not identified	<ul style="list-style-type: none"> • Interagency PA on Denver brick-lined sewers*** • CDOT to develop an in-depth report on the history of the development of Denver's brick-lined sewers****

*No Section 4(f) use, but mitigation measure has been agreed upon by CDOT and CCD for temporary occupancy

**Though the 0.4-acres being added to the east end of the park is less than 0.5 identified in the FEIS/2007 ROD, the Federal Boulevard interchange footprint has been reduced (from 2.1-acres to 1.64-acres) and less parkland is being acquired by the Project compared to the FEIS/2007 ROD Preferred Alternative.

***Mitigation identified as part of the cultural resources (Section 106) consultation; is also being used as Section 4(f) mitigation.

**** Mitigation identified as part of the cultural resources (Section 106) consultation; is also being used as Section 4(f) mitigation. An initial report has been developed.

3.5.7 Coordination

Coordination has been conducted with agencies having jurisdiction or regulatory oversight of Section 4(f) properties. Coordination efforts build upon the FEIS coordination, and to date have included:

- Consultation and coordination with the SHPO for cultural resources and historic sites including the West and Southside Interceptor Sewer.
- Coordination with the CCD Department of Parks and Recreation and Department of Public Works concerning the impacts and mitigation for Section 4(f) resources.
- Completion of an IGA between CDOT and CCD Department of Parks and Recreation. This IGA will include roles and responsibilities of CDOT and CCD, details and requirements of Section 4(f) and Section 6(f) mitigation, and design requirements for Barnum Park East, Barnum Park North, and the bicycle/pedestrian bridge. The IGA will be completed prior to Project construction.
- Completion of a PA between CDOT, FHWA, SHPO, CCD, and Metro Wastewater regarding Denver's brick-lined sewers. The PA has been initiated, and will be completed prior to construction.

CDOT will continue the required coordination outlined in FHWA's nationwide programmatic evaluation "Section 4(f) Evaluation and Approval for Transportation Projects That Have a Net Benefit to a Section 4(f) Property."

3.5.8 Section 4(f) Finding

At the time of the FEIS, FHWA found that there were no prudent and feasible alternatives that met the purpose and need of the project and avoided the use of Barnum Park North and Barnum Park East. Because the impacts of the Project are within the same general footprint and of the same general scale as the FEIS Preferred Alternative and 2007 ROD Selected Alternative, these findings are still valid.

For the West and Southside Interceptor Sewer, FHWA determined that the Project met the criteria in order to use the Section 4(f) Evaluation and Approval for Transportation Projects That Have a Net Benefit to a Section 4(f) Property and that there are no feasible and prudent alternatives to the relocation and reconstruction of the sanitary sewer. FHWA also finds that there are no prudent and feasible alternatives to the use of the West and Southside Interceptor Sewer, and the Project includes all possible planning to minimize harm resulting from such use.

3.6 Section 6(f) Properties

There are three Section 6(f) properties in the Project area, according to information provided by Colorado Parks and Wildlife (CPW). They include:

1. Barnum Park North
2. Barnum Park South
3. South Platte River Greenway, which contains three features in the Project area: Frog Hollow Park, the South Platte River Trail, and Milstein Park

Improvements made utilizing Land and Water Conservation Funds (LWCF) are protected under Section 6(f) of the Act from conversion to uses other than public outdoor recreation without appropriate mitigation.

The FEIS documented no Section 6(f) conversions under the Preferred Alternative. The current Project has Section 6(f) impacts that are different from the FEIS Preferred Alternative because of design refinements made since the FEIS and 2007 ROD and due to changes in how Section 6(f) impacts are assessed. One park (Barnum Park North) is subject to a Section 6(f) conversion with implementation of the Project. One recreation area (the South Platte River Greenway, which includes the South Platte River Trail) is subject to a temporary impact during construction activities.

According to information provided by CPW, the Section 6(f) improvements that were made at Barnum Park South were confined to the southeastern portion of the park, which is outside of the Project area. No grants from the LWCF have been used in Barnum Park East. Thus, no conversion of such resources would occur.

3.6.1 Barnum Park North Description and Impacts

Barnum Park North was previously described in Section 3.5. This park contains improvements made with LWCF grants. Section 6(f) improvements were made at Barnum North Park in 1973 and 1976, and the boundary for improvements encompasses the entire park.

Construction of the new WB on-ramp at Federal Boulevard will result in a 0.63-acre encroachment into Barnum Park North, and constitutes a Section 6(f) resource conversion to a transportation facility. This conversion would cover the same area that is being documented as a Section 4(f) use. This conversion will impact the existing bicycle/pedestrian trail, currently located in CDOT ROW.

3.6.2 South Platte River Greenway Description and Impacts

A portion of the South Platte River floodplain contains improvements made with LWCF grants. This area is called the South Platte River Greenway, and it includes Denver-owned lands in the floodplain, according to information provided by CPW. The Section 6(f) boundary associated with the South Platte River Greenway is shown in Figure 8.



Figure 8: South Platte River Greenway Boundary

At this time, there is no anticipated need for conversion of the South Platte River Greenway; however, because this Project will be constructed as a design/build project, it is possible that the final design may include a small conversion for construction of new bridge piers or water quality structures. As such, CDOT is proceeding with the assumption that as much as five acres (but likely much less) may be converted from the South Platte River Greenway. A Section 6(f) conversion less than five acres is considered a *de minimis* conversion. If during final design or construction it is determined that there will be five or more acres of conversion, the Contractor, CDOT, and FHWA shall follow the process discussed in Section 3.6.3.

The South Platte River Trail, which extends 19 miles north and south of US 6 within the South Platte River Greenway, is a bicycle and pedestrian trail along the river, as shown in Figure 9. Replacing the US 6 bridge over the South Platte River and I-25 will not result in the conversion of this recreational facility to transportation use, but will require temporary closures and detours during bridge and ramp construction.

Table 11 shows the Section 6(f) conversions due to the Project as compared to the Preferred Alternative in the FEIS and 2007 ROD.



Figure 9: Project Improvements at I-25/US 6 Interchange and South Platte River Trail

Table 11: Section 6(f) Conversion Comparison

Section 6(f) Resource	Conversion of Valley Highway Project FEIS/ROD Preferred Alternative (acres)	Conversion of Project (acres)
Barnum Park South	No conversion; Section 6(f) resources are located on opposite side of park, away from US 6 improvements	No conversion; Section 6(f) resources are located on opposite side of park, away from US 6 improvements
Barnum Park North	No conversion	0.63
South Platte River Greenway	No conversion	<i>De minimis</i> conversion of up to five acres, to be determined by the design/build Contractor

Source: FEIS (2006), ROD2 Appendix K

3.6.3 Minimization of Harm to Barnum Park North and the South Platte River Greenway

Table 12 summarizes the mitigation measures for Barnum Park North and the South Platte River Greenway as a result of Section 6(f) conversions, comparing the mitigation to what was documented in the FEIS and 2007 ROD.

Table 12: Section 6(f) Mitigation Comparison

Section 6(f) Resource	Mitigation from Valley Highway Project FEIS/ROD	Mitigation for Project
All resources within Project limits	N/A	<p>CDOT will be immediately notified for any Section 6(f) impacts greater than those anticipated in ROD2. If additional impacts than those already anticipated cannot be avoided, the Contractor will be responsible for all coordination and mitigation measures.</p> <p>CDOT and CPW to continue coordination with NPS about conversion and mitigation approvals, including submitting formal conversion request during construction.</p>
Barnum Park North	Not identified	Acquire additional parkland to offset land conversion
South Platte River Greenway	Not identified	<p>Keep an accurate and detailed record of all impacts to the South Platte River Greenway. These records need to include square footage of the impacts and the value of that land. The Contractor will be required to furnish these records when requested so that CDOT can provide them to CCD, CPW and the National Park Service (NPS) once all impacts are known. If less than or equal to five acres of Section 6(f) land is converted, CDOT to assure that there is an equal value exchange. If greater than five acres is converted, CDOT shall reopen coordination with CPW to determine next steps.</p>

Source: FEIS (2007), ROD2 Appendix K

Barnum Park North

The mitigation for the potential 0.63-acre Section 6(f) conversion at Barnum Park North will be land for land replacement at a minimum one to one ratio in square footage and value. The replacement land will potentially come from several parcels that are being acquired by the Project and will be converted to parkland totaling 0.94-acre. These include, but are not limited to, 720 sf adjacent to 5th Avenue east of Federal Boulevard (parcels 206-210), 18,227 sf adjacent to Barnum Park East (parcel 212c), and 22,090 sf along the South Platte River adjacent to Frog Hollow Park that is privately owned (parcel 225). Figure 10 shows these parcels. The official conversion request will occur during construction, but after all impacts are known and finalized and when the value of the land will be assessed. There will be an equal value exchange for all Section 6(f) properties acquired.

In addition, the trail in Barnum Park North that is located along the south side of the park will be relocated out of the impacted area and the landscaping and irrigation along this trail will be reinstalled or reconstructed.

South Platte River Greenway

CDOT will assure that there is an equal value exchange for any Section 6(f) property acquired. The fair market valuation of the replacement land will exceed the fair market value of the lands acquired as determined by the application of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970. Impacts to the South Platte River Greenway are anticipated to be less than five acres which is the *de minimus* threshold for Section 6(f) conversion. Based on the current US 6 Bridges Design Build plans, impacts are only anticipated to be where the South Platte River bridge piers will be removed and new bridge piers are constructed.

The Contractor shall keep an accurate and detailed record of any changes to projected impacts at all Section 6(f) parks and all impacts to the South Platte River Greenway. These records need to include square footage of the impacts and the appraised value of that land. The Contractor will be required to furnish these records when requested so that CDOT can provide them to CCD, CPW and NPS once all impacts are known. If the Contractor's work results in impacts greater than what is listed to those Section 6(f) resources, and prior to construction activities, the Contractor shall provide CDOT all necessary information for coordination approval and regulatory clearance with CCD, FHWA, CPW, and NPS. If FHWA and NPS approve any new impacts and mitigations to those Section 6(f) resources, the Contractor shall implement those mitigations at the Contractor's expense.

Temporary occupancy of the South Platte River Trail would be adequately mitigated by the same means described earlier for Section 4(f) mitigation.

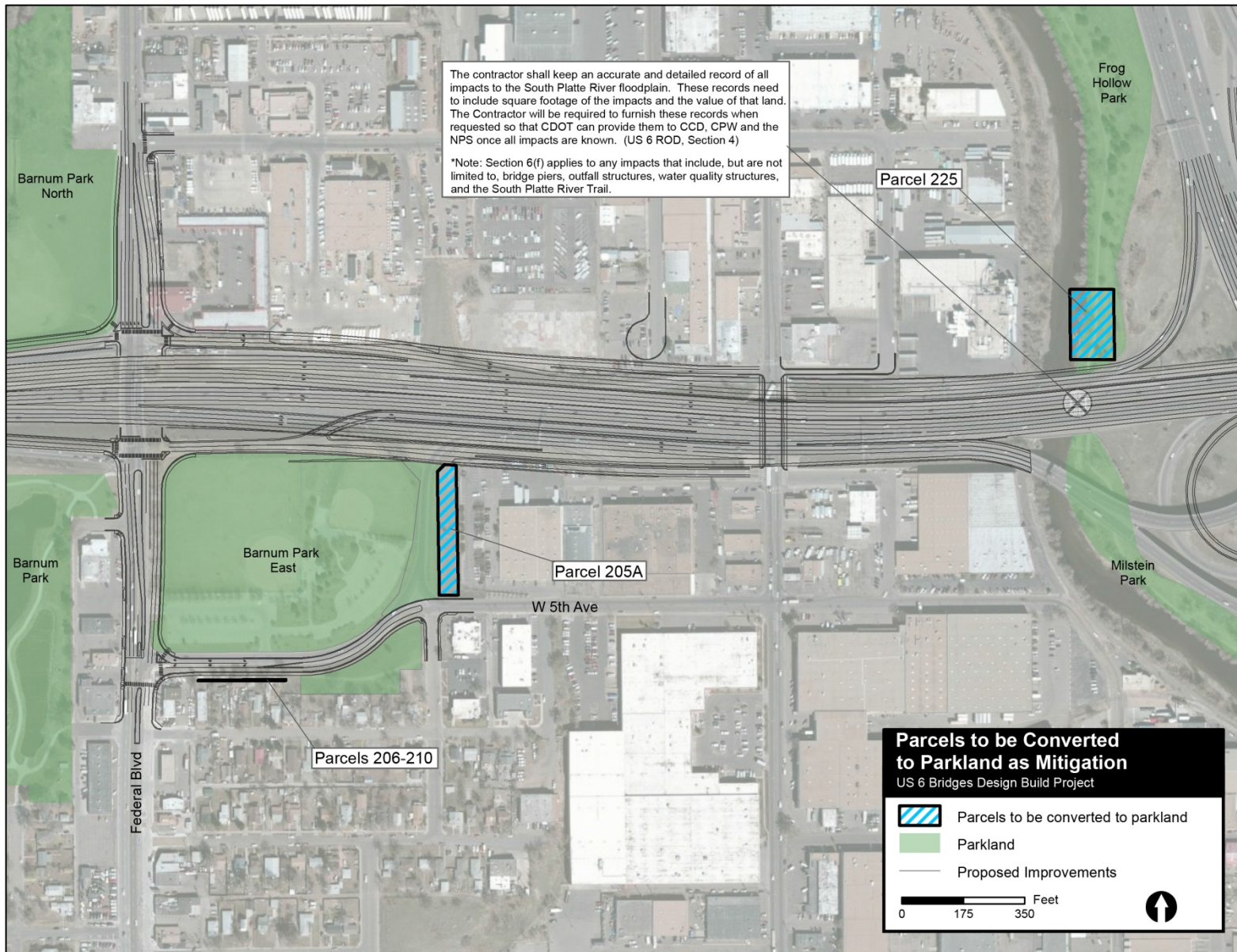


Figure 10: Parcels to be Converted to Parkland as Section 6(f) Mitigation

3.6.4 Coordination

Coordination has occurred with agencies having jurisdiction or regulatory oversight of Section 6(f) properties. Coordination to date has included:

- A scoping meeting with CPW staff on May 11, 2012 to discuss the Section 6(f) properties and boundaries within the Project area. During this meeting, CDOT obtained information about Section 6(f) improvements to specific parks as well as the process for mitigating impacts to parks with Section 6(f) improvements.
- Letters of coordination between CDOT, CCD Department of Parks and Recreation, CPW, and the NPS concerning Section 6(f) impacts and mitigation measures. All agencies have indicated support for the project and have agreed to the proposed mitigation measures. The coordination letters can be found in Appendix B of ROD2.
- CPW has begun the consultation process with the NPS for conversion of Barnum Park North and the South Platte River floodplain. CPW sent a letter to NPS in August 2012 requesting conversion of Barnum Park North and requesting their acceptance of mitigation measures for Barnum Park North and the South Platte River Trail. These mitigation measures included the new bicycle/pedestrian bridge connecting Barnum Park North and South, which is also included as Section 4(f) mitigation. NPS responded with the requirement that Section 6(f) conversions must be mitigated with a replacement of land-for-land at a one-to-one ratio and equivalent value, and that the new bridge could not count as mitigation.
- CDOT sent a revised letter to CPW on November 6, 2012 requesting approval to convert Section 6(f) assisted land within Barnum Park North for the Project, and requesting acceptance of the revised mitigation measures that have been proposed for Barnum Park North and the South Platte River Trail. The mitigation measures were modified since the August 2012 correspondence to include a land-for-land replacement at a one-to-one ratio and equivalent value. CPW coordinated with NPS on the revised mitigation. NPS responded via telephone call to CPW on November, 19, 2012 indicating agreement in concept with the mitigation approach. This documented conversation can be found in Appendix B of ROD2.
- Per NPS request, after construction of the Project, the value of land will be assessed and an official Section 6(f) conversion request will be made to NPS.

3.6.5 Section 6(f) Conclusion

Table 13 summarizes the conversions associated with the Project elements and the total acres of land proposed as mitigation.

Table 13: Summary of Section 6(f) Conversions

Project Element	Section 6(f) Site	Acres of Conversion
US 6/Federal Boulevard Interchange	Barnum Park North	0.63
I-25/US 6 Interchange: Bridge and Ramp Improvements	South Platte River Greenway	<5
Total		0.63 – 5.62

As discussed in Section 3.6.4, coordination is ongoing between CDOT, FHWA, CPW, and NPS for mitigation for Section 6(f) conversions.

Because this is a design/build project, the final design and construction of the Project may result in adjustments that affect the area impacted or the improvements proposed within one or more of the park or recreation resource areas, including the South Platte River Greenway. If one of these adjustments is proposed, the design/build Contractor will be required to work with CDOT to secure support from CCD Department of Parks and Recreation and approval from FHWA and/or NPS for any changed impacts and mitigation commitments.

3.7 Hazardous Materials

The FEIS and 2007 ROD documented that construction of the project would require partial or complete acquisition of properties with potential or recognized environmental conditions. Some of these properties were found to be active leaking underground storage tank (LUST) sites. The FEIS and 2007 ROD mitigation for these impacts included:

- A detailed review of files related to the LUST properties, as well as other LUST properties within the project area that are identified during future assessments, and coordination with the Colorado Department of Labor and Employment, Division of Oil and Public Safety (OPS) to ensure that site characterization and/or remediation are completed.
- Prior to construction, the Contractor shall prepare of a dewatering plan and secure all required dewatering and remediation permits through CDPHE.

The ROD2 hazardous materials analysis reevaluated the FEIS-identified sites within the Project footprint and evaluated new sites within the Project footprint that were identified as having potential and recognized environmental conditions. This evaluation was based on a review of assessments produced to support the FEIS, and assessments and investigations performed since that time, including:

- 2011 Initial Site Assessment (ISA) near the US 6 Bridge over the BNSF Railway Company tracks
- 2012 environmental data resources (EDR) and research of various other agency databases
- 2012 site reconnaissance
- Limited subsurface investigations conducted in December 2011, July 2012 and October 2012

Given the results of the 2005 MESA, 2011 ISA, and 2012 hazardous materials analyses, CDOT has conducted a Phase II investigation at the area under/around the BNSF bridge and the area around the location of the Tunnel/I-25 Bridge to further determine if soil/groundwater contamination is present in these areas. The results of these investigations can be found in the December 2012 subsurface investigations. Appendix H details the data sources and methodologies of these investigations.

Based on the Project design and the ROD2 evaluation, six properties with potential or recognized environmental conditions will be partially or completely acquired for the Project. Appendix H describes these properties, including their relative risk level. Only one site demonstrated a high risk ranking and it is located at 450 Federal Boulevard. Because the Project only requires a temporary easement on this site and not permanent acquisition, no additional investigation is required.

The July and October 2012 subsurface investigations indicated that Resource Conservation and Recovery Act (RCRA) metals are most likely present in soil and groundwater throughout the Project area. Due to this finding, as well as known and suspected contamination, a Materials Management Plan (MMP) will be developed and implemented on the entire Project area. Additionally, CDOT and the Contractor shall follow Section 250, Environmental, Health, and Safety Management, of the CDOT Standard Specifications for Road and Bridge Construction (CDOT, 2011) and relevant Occupational Safety and Health Administration (OSHA) and other state and federal regulatory requirements. Part of the applicable requirements of Section 250 will be the completion of a Health and Safety Plan (HASP). Appendix C and Table 14 detail the mitigation measures required for construction of the Project.

3.8 Traffic and Transportation Management

This transportation analysis of the Project includes traffic projections to 2035 and traffic operations updates to the FEIS. Overall, since the FEIS and 2007 ROD:

- There have been no changes to the Project with regards to lane configurations and geometry, other than the widening of Federal Boulevard from five to six lanes, as included the Federal Boulevard Planning and Environmental Linkages Study, the 2012-2017 Transportation Improvement Program, and the Cycle 1 Amendments to the 2035 RTP.
- There have been no other new circumstances to be considered.

The traffic analysis parameters established during the FEIS process were used as the basis for the operational analysis of freeway sections and surface street intersections. Per consultation with FHWA and CDOT, the 2025 FEIS traffic volumes were projected by one percent per year to year 2035 for use in the ROD2 analysis. A 2035 operational analysis was conducted and the following items highlight the results of the comparison between the No Build condition and the implementation of the Project.

3.8.1 Operational Analysis

Figure 11 shows the 2035 expected traffic operations for the Project. West of Federal Boulevard, EB US 6 will operate at level-of-service (LOS) F during the AM Peak Hour with both the No Build and the Project. Similarly, WB US 6, at both the Federal Boulevard on- and off-ramps, will operate at LOS F

during the PM peak hour. The other locations along the US 6, in both directions, will operate LOS D or better during the AM and PM peak hour.

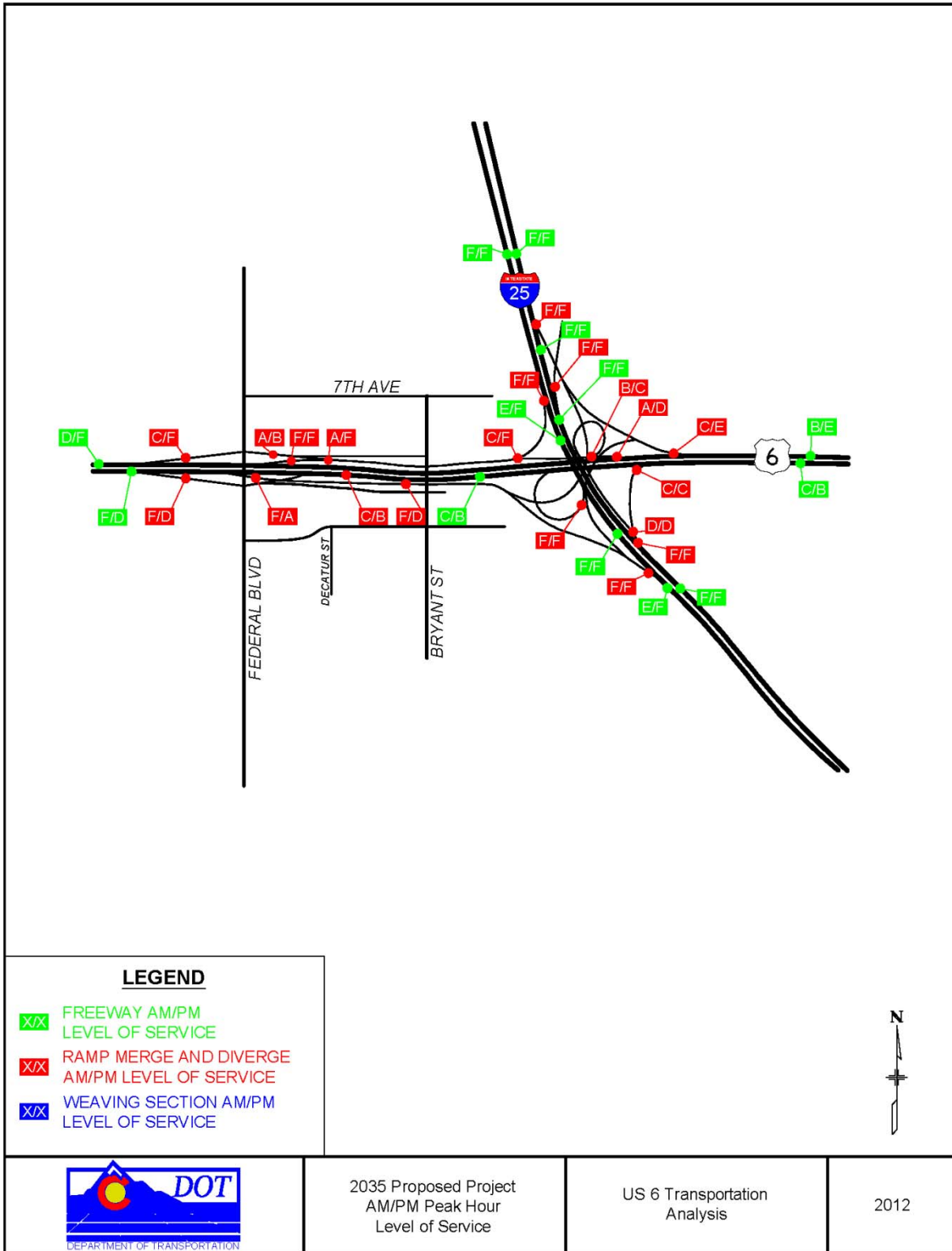


Figure 11: 2035 Proposed Project AM/PM Peak Hour Levels of Service

Three weaving sections will operate at LOS F during the AM and PM peak hours in the 2035 No Build alternative. The Project will improve freeway operations by removing weaving sections from the freeway system. Those areas include:

- EB US 6 between Federal Boulevard and Bryant Street off ramp
- WB US 6 between the SB I-25 on-ramp and the Bryant Street off ramp
- NB I-25 On-Ramp to WB US 6 Frontage Rd Off-Ramp

With the Project, each of the WB and EB US 6 merge/diverge sections are anticipated to operate in the range of LOS D through F, which is the same or better than LOS F for operations in the 2035 No Build condition. Several locations will operate better during both peak hours with the implementation of the Project and eliminate several EB and WB merge/diverge conflict points.

Several surface street intersections operate with deficient levels of service for the No Build scenario. With the Project, many of the intersections will be at LOS D or better after signal timing is optimized for the future traffic volumes.

3.8.2 Bicycle and Pedestrian Impacts

Bicycle and pedestrian improvements that will be implemented with the Project include the following:

- Construction of a bicycle/pedestrian bridge over US 6, which will offer a separate crossing over the freeway with connections to existing paths and routes. This is a new Project element that was not included in the FEIS and 2007 ROD, and is mitigation for the Section 4(f) impacts at Barnum Park East.
- The widening of sidewalks on the Federal Boulevard bridge from 5-feet to 8-feet on both sides of the roadway.
- Lighting modifications across the Federal Boulevard Bridge that will conform to CCD corridor lighting standards.

3.8.3 Traffic Safety

The 2005 Traffic Safety Assessment Report addressed collisions as being an issue within the corridor and it was established that it is related to congestion, recurrent and frequent queuing, close interchange spacing, and the geometric characteristics of the existing alignment. The history of collisions throughout the corridor indicates a high potential for accident reduction if improvements are constructed. The implementation of the Project is expected to reduce the number of accidents by 1,550 to 1,750 relative to the 2025 FEIS No Build Alternative in the US 6 area by separating EB weaving movements using a collector-distributor road, and by removing the substandard interchange ramp at Bryant Street. The Project improvements maximize safety and operations by developing roadway improvements that separate traffic movements to mitigate friction between traffic streams.

3.8.4 Conclusion

The Project will not have any adverse impacts on traffic operations and will result in overall traffic operations and traffic safety improvements. Several bicycle and pedestrian improvements will be made with the Project. These impacts are similar to those disclosed in the FEIS for the Preferred Alternative.

4 Measures to Minimize Harm

All practicable means to avoid or minimize environmental harm from the Project have been adopted, and appropriate measures to mitigate environmental harm from the Project have been identified.

Measures to avoid or minimize environmental harm included:

- Measures included in the FEIS and 2007 ROD
- Design modifications to reduce ROW and park and recreational impacts by utilizing retaining walls and modifying structures to minimize the Project footprint
- Locating water quality ponds in areas without active uses and on parcels already owned by CDOT
- Coordination with Metro Wastewater to minimize impacts to the West and Southside Interceptor Sewer

Mitigation measures for each resource in the FEIS and 2007 ROD were reviewed and carried forward if applicable, and mitigation measures were added for any resources with additional impacts. A summary of all mitigation measures for Phase 1 (including the US 6/Federal Boulevard interchange) as presented in the 2007 ROD, Phase 5 as presented in the FEIS, and the six new, minor project elements are shown in Table 14. These mitigation measures are consistent with both the CDOT Mitigation Tracking Form in Appendix C and Book 2 Section 5 of the Project contract documents. The Mitigation Tracking Form will be used by CDOT and the Contractor to ensure that all mitigation commitments are met.

The decision-making process will continue during the design/build process. Book 2 Section 5 of the Project contract document details the mitigation processes in the event that adjustments are made to Project impacts. As the design process continues, more detailed design decisions and more specific commitments will be made to minimize both environmental impacts and impacts to adjacent property owners. In coordination with local agencies, the public involvement process will include a public outreach program. CDOT will continue to coordinate with the CCD, RTD, CDPHE, Public Utilities Commission (PUC), and the US Army Corps of Engineers (USACE) throughout the design and construction phases.

Table 14: Summary of Previously and Currently Identified Impacts and Mitigation

Resource	FEIS and 2007 ROD		US 6 Bridges Design Build Project: What Has Changed	US 6 Bridges Design Build Project	
	Impacts of Preferred Alternative	Mitigation		Impacts of Project	Mitigation
Air Quality	<p>Improved air quality due to improved traffic flow.</p> <p>Meets air quality conformity requirements.</p> <p>Temporary increase in air emissions during construction.</p>	<p>Maintain construction equipment in good working order, minimize excessive idling of inactive equipment or vehicles, and consider using higher-grade fuel.</p> <p>Implement a dust control plan and locate stationary equipment as far from sensitive receivers as possible.</p>	<p>2007: EPA rule on the Control of Hazardous Air Pollutants from Mobile Sources (Federal Register, Vol. 72, No. 37, page 8430, February 26, 2007.</p> <p>2009: New PM2.5/10 Guidance from FHWA/EPA.</p> <p>Requirement that construction equipment and vehicles use higher grade fuel is obsolete per new EPA requirement. 2010 EPA requirement that all non-road equipment will use ultra-low sulfur diesel.</p> <p>2012: EPA modified NAAQS for PM10.</p>	<p>Same as FEIS/ROD.</p>	<p>In accordance with CDPHE-APCD requirements, prepare and implement a dust control plan.</p> <p>All non-road equipment will use ultra-low sulfur diesel.</p> <p>Locate stationary emissions equipment (generators, compressors, idling vehicles, etc) with consideration of public health and environment.</p> <p>Comply with CDOT's Specification 250.70 - Asbestos Containing Material Management if asbestos is encountered.</p> <p>Minimize excessive idling of inactive equipment or vehicles.</p> <p>If construction equipment is creating excessive air quality emissions that have a potential to affect air quality for operators or persons working/living in the area, equipment shall be taken out of operation until fixed or replaced.</p>
Soils and Geology	<p>Expansive soils and unsuitable fill material may be encountered</p>	<p>Consider potential for expansive soils and unsuitable fill during final design</p>	<p>No changes.</p>	<p>Same as FEIS/2007 ROD.</p>	<p>Conduct a geotechnical analysis of the surrounding subsurface prior to final design to consider the potential for expansive soils. If discovered, unsuitable fill will be removed and replaced with appropriate fill material or mitigated as recommended by the geotechnical analysis.</p>

Resource	FEIS and 2007 ROD		US 6 Bridges Design Build Project: What Has Changed	US 6 Bridges Design Build Project	
	Impacts of Preferred Alternative	Mitigation		Impacts of Project	Mitigation
Water Quality and Water Resources	<p>Short-term increase in sediment from construction.</p> <p>Increase in impervious drainage area.</p> <p>Consolidation of stormwater runoff with fewer outfalls to the South Platte River.</p> <p>Improved quality of stormwater discharge due to construction of water quality ponds and BMP stormwater facilities.</p>	<p>Use construction BMPs to reduce temporary impacts.</p> <p>On-site project area runoff will be controlled through water quality ponds or other BMPs to settle and improve water quality runoff releasing to the South Platte River.</p> <p>Reduction of the overall number of outfalls into the South Platte River and installation of energy dissipaters, such as riprap, at outfalls to reduce erosion potential.</p> <p>Use pump stations to remove runoff at underpasses on grade separations and use water quality ponds to settle sediment and improve water quality releasing into the South Platte River.</p>	<p>The Reevaluation and preliminary design identified the need for water quality ponds.</p>	<p>Improvement to water quality and stormwater management due to new ponds.</p>	<p>Identify hazardous spill containment structure locations and recommend BMPs based on their potential effectiveness in reducing hazardous waste discharge to the South Platte River. Comply with CDOT Standard Specification 207 and 208.</p> <p>Implement appropriate temporary BMPs for erosion and sediment control according to the CDOT Erosion Control and Stormwater Quality Guide (CDOT, 2002), and develop a stormwater management plan (SWMP), which includes water quality monitoring by the Contractor to ensure effectiveness of temporary construction BMPs.</p> <p>Provide for permanent stabilization consistent with CDOT's Municipal separate storm sewer system (MS4) permit through revegetation and permanent erosion controls measures.</p> <p>Use storm sewer system, pump stations, or other approved methods to remove runoff at underpasses on grade separations and use water quality ponds or other approved water quality BMPs to settle sediment and improve water quality prior to releasing the runoff into the South Platte River.</p> <p>Reduce the overall number of outfalls into the South Platte River in compliance with CDOT's MS4 permit.</p>

Resource	FEIS and 2007 ROD		US 6 Bridges Design Build Project: What Has Changed	US 6 Bridges Design Build Project	
	Impacts of Preferred Alternative	Mitigation		Impacts of Project	Mitigation
Water Quality and Water Resources, continued					<p>Install energy dissipaters, such as riprap, or other equitable allowable BMPs, at outfalls to reduce erosion potential in accordance with Section 208 of the 2011 Standard Specification for Road and Bridge Construction.</p> <p>The Reevaluation and preliminary design identified the need for water quality ponds. Construct ponds or other equitable allowable permanent BMPs, for erosion and sediment control according the CDOT Erosion Control and Stormwater Quality Guide (CDOT, 2002).</p>
Floodplains	<p>Temporary impacts during replacement of SB Santa Fe Drive and Alameda Avenue bridges over the South Platte River.</p> <p>Encroachment into floodplain from SB I-25 off ramp to Santa Fe Drive.</p>	<p>Design bridges to minimize the impact on floodplains of piers, abutments, and roadways, to the extent practicable. Restore bridge construction areas.</p> <p>Install storm sewer improvements to reduce flooding on I-25 under Alameda Avenue.</p> <p>Provide adequate floodplain width in areas of floodplain encroachment for overall “no rise” in floodplain.</p>	<p>Reconstruction of SB I-25 to EB US6 ramp, which is in the 100-year floodplain, is a new project element.</p>	<p>Potential floodplain impacts due to the replacement of the South Platte River Bridge and the reconstruction of the I-25/US 6 interchange</p>	<p>Design bridges to minimize the impact on floodplains from piers, abutments, and roadways, to the extent practicable.</p> <p>Restore construction areas to the pre-construction conditions in accordance with Book 2 Section 5.1.6. Vegetation</p> <p>Provide adequate floodplain width in areas of floodplain encroachment for overall “no rise” in floodplain.</p> <p>Contractor shall ensure that there is no rise in floodplain elevation due to construction of the Project. If there is a rise in floodplain elevation, future coordination with the Denver Area Urban Drainage and Flood Control District will be required.</p>

Resource	FEIS and 2007 ROD		US 6 Bridges Design Build Project: What Has Changed	US 6 Bridges Design Build Project	
	Impacts of Preferred Alternative	Mitigation		Impacts of Project	Mitigation
Wetlands, Waters of the US, and Open Water	0.221 acre of jurisdictional and 0.020 acre of non-jurisdictional wetlands impacted	<p>Mitigate jurisdictional and non-jurisdictional wetlands on a 1:1 basis</p> <p>Minimize culvert lengths and use construction BMPs to reduce impacts</p> <p>Use construction BMPs to reduce temporary impacts; and use water quality BMPs to minimize indirect impacts</p>	A new wetland was delineated north of the US 6 structures over the South Platte River. This wetland is 100 SF in size.	Due to the proximity of this wetland to the structure at the South Platte River it is assumed this wetland will be permanently impacted in the construction of the structures over the South Platte River. A total of 100 sf of jurisdictional wetlands will be impacted as a result of the Project.	<p>Accurately estimate the amount of permanent and temporary impacts to all jurisdictional and non-jurisdictional wetlands including the 100 square foot area near the I-25 SB ramp to US 6 identified in the Biological Resources Report and the impacts below the ordinary high water mark due to the replacement of the South Platte River bridge. The Contractor must provide those impact calculations to CDOT as part of the Section 404 permit application.</p> <p>Mitigate for temporary and permanent wetland impacts, through banking, to both jurisdictional and non-jurisdictional wetlands on a 1:1 basis, at a minimum. CDOT will pay for mitigation banking credits for 100 sf of wetland impacts. The Contractor is responsible to pay for any additional wetland bank credits, beyond the CDOT provided 100 sf, from a wetland mitigation bank approved by the USACE.</p> <p>Ensure that all environmentally sensitive areas have clearly labeled "No Parking and No Staging Areas" on the final plan sheets; all wetlands delineated and mapped for the project as shown in Biological Resources Report that will not be impacted by the project, will be protected from construction activities by construction limit fencing.</p>

FEIS and 2007 ROD			US 6 Bridges Design Build Project: What Has Changed	US 6 Bridges Design Build Project	
Resource	Impacts of Preferred Alternative	Mitigation		Impacts of Project	Mitigation
<p>Wetlands, Waters of the US, and Open Water, continued</p>					<p>CDOT will require the Contractor to prepare any applications for CWA Section 404 permits and submit to CDOT for final review, approval, and submittal to USACE. The Contractor will be responsible for purchasing any mitigation credits required.</p> <p>Design and construct minimum length culverts and use construction BMPs to reduce impacts to wetlands, waters of the US and riparian areas.</p> <p>Use construction BMPs to reduce temporary impacts; and use water quality BMPs to minimize indirect impacts.</p>

Resource	FEIS and 2007 ROD		US 6 Bridges Design Build Project: What Has Changed	US 6 Bridges Design Build Project	
	Impacts of Preferred Alternative	Mitigation		Impacts of Project	Mitigation
Vegetation and Wildlife	Removal of vegetation during construction.	Revegetate construction areas using CDOT – approved native seed mix. If construction occurs outside of appropriate seeding windows, slopes will be temporarily protected from erosion using mulch and mulch tackifier.	<p>MBTA rules will still apply.</p> <p>The Proposed Project will still require the replacement of the structures over the South Platte River and the removal of trees throughout the project area.</p> <p>USFWS signed a Biological Opinion on 04/04/2012 which addresses construction of the structures over the South Platte River.</p>	Potential to disturb migratory bird nests as a result of tree removal.	<p>Prepare an SB 40 Wildlife Certification Application and Mitigation Plan and submit to CDOT for final review, approval, and CDOT submittal to CPW prior to construction. The Contractor will be responsible for any replacement trees as required. CDOT shall review, approve and submit the application to CPW at least 60 days prior to planned construction or maintenance activities to allow for CPW review of the submitted documents and for follow up coordination, if required. CDOT Project Special Provision 240 will be followed.</p> <p>Reseed and protect temporary disturbance areas with CDOT-approved BMPs and avoid disturbance to existing vegetation, to the maximum extent possible.</p> <p>Seed, mulch, and mulch tackifier will be applied in accordance with CDOT Specifications.</p> <p>Follow CDOT Project Special Provision 240. If construction is to commence between April 1 and August 31, to avoid impacts to nesting birds in accordance with the MBTA, a qualified biologist will conduct a nest survey prior to construction. If active nests are found during construction, coordination with CPW and USFWS is required to determine an appropriate course of action, which may include, but is not limited to, a delay in construction to</p>
	Potential introduction of noxious weeds into areas disturbed by construction.	Replace trees greater than 2 inches in diameter on a 1:1 basis. Existing shrubs removed during construction in the South Platte River riparian area will be replaced with native species to their pre-construction aerial coverage.		The aquatic/open water habitat provides habitat for fish such as common carp, white sucker and fathead minnow. Habitat for these fish could be impacted as a result of the replacement of the structures over the South Platte River.	
	Short-term disturbance of wildlife and aquatic habitat during construction.	Impacted landscape areas (irrigated or otherwise) shall be enhanced and incorporated into final design to ensure the existing landscape does not become fragmented.		Potential to disturb nesting Cliff Swallow during demolition or construction activities of the structures over the South Platte River.	
	Improvements to Santa Fe Drive bridge will move traffic away from wildlife habitat along the South Platte and will improve wildlife travel corridor by increased horizontal and vertical clearance of bridges.	Target noxious weed populations by preparing and implementing an Integrated Weed		Potential for minor impacts to the northern	

FEIS and 2007 ROD			US 6 Bridges Design Build Project: What Has Changed	US 6 Bridges Design Build Project	
Resource	Impacts of Preferred Alternative	Mitigation		Impacts of Project	Mitigation
		<p>Management Plan.</p> <p>Conduct habitat disturbing activities, such as tree removal, grading, scraping, grubbing, etc., during the non-breeding season unless the area has been verified by a qualified biologist that no active nests are present</p>		<p>leopard frog and the common garter snake.</p> <p>Depletion to the South Platte River as a result of the construction of the structures over the South Platte River</p>	<p>avoid the breeding season.</p> <p>Trees removed during construction shall be replaced at a 1:1 replacement ratio based on a stem count of all trees with diameter at breast height of 2 inches or greater. Shrubs removed during construction, whether native or non-native, will be replaced based on their preconstruction aerial coverage. In all cases, all such trees and shrubs will be replaced with native species.</p> <p>Construct bridges over the South Platte River during the non-breeding season (August through March) to avoid impacts to spawning fish and spawn beds or as otherwise specified in the SB 40 Wildlife Certification.</p> <p>Mitigate for impacts to habitat to the northern leopard frog and the common garter snake by installing any approved BMPs from the SB 40 Wildlife Certification and the Nationwide CWA Section 404 Permit.</p> <p>Enhance and incorporate impacted landscape areas (irrigated or otherwise) into final design to ensure the existing landscape does not become fragmented.</p> <p>Implement the Integrated Noxious Weed Management Plan which is provided in the Biological Resources Report (Appendix G), or as otherwise approved by CDOT.</p>

Resource	FEIS and 2007 ROD		US 6 Bridges Design Build Project: What Has Changed	US 6 Bridges Design Build Project	
	Impacts of Preferred Alternative	Mitigation		Impacts of Project	Mitigation
Historic and Archaeological Preservation	No impacts are expected.	If historic or archaeological materials are encountered or unearthed during construction, work will be halted immediately in the vicinity of the find, and the CDOT archaeologist or cultural resource staff, and the SHPO, will be notified promptly.	23 new historical resources including 17 historic buildings and six historic linear transportation features were identified. The addition of these resources is due to the maturation of their age to over 50 years between 2007 and 2012.	Of these newly defined historic resources, only the brick-lined sewer is adversely affected. This impact is a result of the removal and reconstruction of the South Platte River Bridge.	<p>If historic or archaeological materials are encountered or unearthed during construction, work will be halted immediately in the vicinity of the find, and the CDOT archaeologist or cultural resource staff, and the SHPO, will be notified promptly. This process is outlined in Section 107.23 of CDOT's Standard Specifications for Road and Bridge Construction for procedures regarding unexpected discoveries during construction.</p> <p>Follow process outlined in 36 CFR 800.12 regarding Section 106 compliance during emergency situations.</p> <p>Mitigation for the adverse effect to the West and Southside Interceptor will be mitigated in the future with the execution of the Denver brick-lined sewers PA. No further coordination is required from the Contractor unless new or additional impacts are discovered.</p>

Resource	FEIS and 2007 ROD		US 6 Bridges Design Build Project: What Has Changed	US 6 Bridges Design Build Project	
	Impacts of Preferred Alternative	Mitigation		Impacts of Project	Mitigation
Paleontology	Denver Formation fossils may be encountered during construction.	CDOT paleontologist to examine final design plans to determine the extent of impact to the Denver Formation, and the scope, if any, of monitoring required.	No additional impacts to paleontology resources are anticipated.	Same as FEIS/2007 ROD.	Provide the CDOT paleontologist 90 % final design plans for examination to determine the extent of impact to the Denver Formation, and the scope, if any, of monitoring required prior to construction. If subsurface bones or other potential fossils are discovered, the Contractor shall halt work and contact CDOT Staff Paleontologist to assess significance and make recommendations.
Socio-Economics and Community	<p>Displacement of businesses</p> <p>Improved safety; replacement/improvement of deteriorating facilities</p> <p>Pedestrian and bicycle improvements</p> <p>Reduced cut-through traffic due to reduction in congestion</p> <p>Implementation of the project in phases will introduce uncertainty with regard to timing of property acquisition for future phases</p>	<p>Continue discussions with local communities during design and implementation to minimize disruptions.</p> <p>Continue consideration of environmental justice through final design, and implementation.</p> <p>Continue coordination with CCD.</p>	The Project will not impact any new communities or resources.	<p>Displacement of businesses</p> <p>Construction activities impacting local communities</p> <p>Closure of the WB US 6 to Bryant Street ramp.</p>	<p>Implement public information strategies such as media advisories, VMSs, advance signs, a telephone hotline, real-time web cameras, the use of ITSs and technology in construction work zones, a construction project website, and alternate route advisories to alert travelers to construction activities and encourage business patronage during construction.</p> <p>Continue discussions with local communities during design and implementation to minimize disruptions.</p> <p>Continue coordination with CCD.</p> <p>Consideration of low-income and minority communities through final design, and implementation.</p>

Resource	FEIS and 2007 ROD		US 6 Bridges Design Build Project: What Has Changed	US 6 Bridges Design Build Project	
	Impacts of Preferred Alternative	Mitigation		Impacts of Project	Mitigation
Right-of-Way and Displacements	Displacement of 11 businesses; full purchase of eight properties; partial purchase and access modification to 20 properties	Conform to the requirements set forth in the Uniform Relocation Assistance and Real Property Acquisitions Policies Act of 1970, as amended, which contains specific requirements that govern the manner in which a government entity acquires property for public use. Prepare a relocation analysis and provide relocation advisory service.	Additional ROW required in order to implement the proposed design.	Displacement of one business (Parcel No. 200); full purchase of one property (Parcel No. 200); acquisition of sixteen permanent easements or partial acquisitions and eight temporary easements.	Comply with the Uniform Relocation and Assistance of Real Property Acquisition Policies Act of 1970, as amended. Prepare a relocation analysis and provide relocation advisory service.
Section 4(f) and Section 6(f) Resources	N/A	N/A	Updated Section 4(f) and Section 6(f) impacts within Project limits	Additional Section 4(f) or 6(f) impacts	CDOT will be immediately notified for any Section 4(f) or 6(f) impacts greater than those anticipated in ROD2. If additional impacts than those already anticipated cannot be avoided, the Contractor will be responsible for all coordination and mitigation measures.
Section 4(f) and Section 6(f) Resources	Section 4(f) use of Barnum Park North (0.42 acre)	Minimize acquisition by shifting Federal Boulevard widening to the east	Design refinements to SB Federal Boulevard to WB US 6 ramp	Section 4(f) use of Barnum Park North (0.63-acres)	For any new or additional impacts, minimize acquisition by shifting Federal Boulevard widening to the east. Construct a bicycle/ pedestrian bridge over US 6 (west of Federal Boulevard) to connect Barnum Park North and Barnum Park South.

Resource	FEIS and 2007 ROD		US 6 Bridges Design Build Project: What Has Changed	US 6 Bridges Design Build Project	
	Impacts of Preferred Alternative	Mitigation		Impacts of Project	Mitigation
Section 4(f) and Section 6(f) Resources	Section 4(f) use of Barnum Park North (0.42 acre)	Relocate trail north of its current location; replace fencing, turf and irrigation system	Design refinements to SB Federal Boulevard to WB US 6 ramp Construction of new bicycle/pedestrian bridge for Section 4(f) mitigation	Section 4(f) use of Barnum Park North (0.63-acres)	Relocate trail north of its current location; replace fencing, turf and irrigation system; provide all CDOT commitments included in the IGA with Denver Department of Parks and Recreation; and reconfigure trail near tie-in to the new bicycle/pedestrian bridge landing to provide connectivity.
Section 4(f) and Section 6(f) Resources	No Section 6(f) impacts identified for Barnum Park North	None	Design refinements to SB Federal Boulevard to WB US 6 ramp	Section 6(f) conversion of Barnum Park North (0.63-acres)	Acquire additional parkland to offset land conversion
Section 4(f) and Section 6(f) Resources	Section 4(f) use of Barnum Park East (2.1 acres)	Minimize acquisition; add 0.5 acre to east edge of park; reconstruct/reconfigure facilities to maintain park function and provide upgraded facilities; enhance ADA access; install new playground	Minimization of impacts to Barnum Park East	Section 4(f) use of Barnum Park East (1.64 acres)	Limit use to 1.64 acres; reconstruct park as outlined in the 2013 IGA between CDOT and Denver Department of Parks and Recreation; add 0.4-acres to the east end of park. CCD to make arrangements to provide alternative play locations from permitted field users during seasons that will be disrupted by construction; CDOT to financially compensate CCD for costs associated with this effort.

Resource	FEIS and 2007 ROD		US 6 Bridges Design Build Project: What Has Changed	US 6 Bridges Design Build Project	
	Impacts of Preferred Alternative	Mitigation		Impacts of Project	Mitigation
Section 4(f) and Section 6(f) Resources	No Section 6(f) impacts identified for South Platte River Greenway	None	Section 6(f) resource was identified	Section 6(f) conversion of South Platte River Greenway is estimated to be less than 5 acres.	Keep an accurate and detailed record of all impacts to the South Platte River Greenway. These records need to include square footage of the impacts and the value of that land. The Contractor will be required to furnish these records when requested so that CDOT can provide them to CCD, CPW and the NPS once all impacts are known. If less than or equal to five acres of Section 6(f) land is converted, CDOT to assure that there is an equal value exchange. If greater than five acres is converted, CDOT shall reopen coordination with CPW to determine next steps.
Section 4(f) and Section 6(f) Resources	No Section 6(f) impacts identified	None	Section 6(f) resources identified	Section 6(f) conversion of Barnum Park North (0.63-acres) and South Platte River Greenway (estimated to be less than 5 acres)	CDOT and CPW to continue coordination with NPS to obtain approval for the Section 6(f) conversions and mitigations. CPW to submit official conversion request to NPS during construction, but after all impacts are known and finalized and the value of the land is assessed.

Resource	FEIS and 2007 ROD		US 6 Bridges Design Build Project: What Has Changed	US 6 Bridges Design Build Project	
	Impacts of Preferred Alternative	Mitigation		Impacts of Project	Mitigation
Park/Recreation Resources	Section 4(f) use of Barnum Park South (0.01 acres)	Minimize acquisition by shifting Federal Boulevard widening to the east	Eliminated impact to Barnum Park South	Temporary occupancy of park during construction	Ensure that all environmentally sensitive areas have clearly labeled "No Parking and No Staging Areas" on the final plan sheets; replace landscaping that is damaged as a result of construction activities; and provide on-site public notices of construction activities.
Park/Recreation Resources	South Platte River Trail - Replacement of the South Platte River Bridge will cause temporary construction impacts.	Provide detours for trail users; minimize closure times; provide public notification on detours	No changes	Replacement of the South Platte River Bridge will cause temporary construction impacts	<p>Contractor to provide mitigation during construction as defined in Book 2 Section 16.2.8 (Trail and Pedestrian Impacts) for the temporary use of the South Platte River Trail:</p> <ul style="list-style-type: none"> Existing trail systems, temporary trails, sidewalks, and pedestrian routes must be maintained at all times. An approved detour is included in Book 2 Section 16.2.8. The Contractor shall meet all requirements of the Americans with Disabilities Act. No trail closures shall be allowed from 5:00 a.m. to 8:00 p.m. any day of the week. <p>Temporary trail detours will be allowed under the following conditions: Public Information Plan requirements shall be identified and appropriate public notifications provided; the Contractor shall comply with the CDOT <i>Construction Detour Standards for Multi-Use Trails</i>.</p>

Resource	FEIS and 2007 ROD		US 6 Bridges Design Build Project: What Has Changed	US 6 Bridges Design Build Project	
	Impacts of Preferred Alternative	Mitigation		Impacts of Project	Mitigation
Noise and Vibration	<p>Within the Phase 1 and 2 area, noise levels warranted evaluation of abatement measures for Vanderbilt Park, Vanderbilt Park East, Habitat Park, and Barnum East Park.</p>	<p>Noise abatement evaluation results show that noise barriers or other noise abatement measures are not feasible and/or reasonable for noise abatement at these parks and commercial properties.</p>	<p>2011 revisions to FHWA and CDOT Noise Analysis and Abatement Guidance.</p>	<p>Noise Impacts at Barnum Parks (North and East), Frog Hollow Park, Milstein Park, South Platte River Trail, one Motel, and at most first and second row residences located north and south of US6 between Knox Court and Sheridan Boulevard.</p> <p>Nighttime construction noise at residential receptors.</p>	<p>Schedule noisiest construction activities during less noise sensitive times when possible.</p> <p>Schedule construction between 7am and 9pm, or in accordance with local noise regulations.</p> <p>Denver ordinance requirements shall be adhered to if noise sensitive receptors will be impacted at night.</p>
	<p>Within Phase 1 and 2 areas, noise levels warranted evaluation of abatement measures for seven commercial properties.</p>	<p>During preparation of final design, consider elements to reduce “nuisance noise” experienced near the highway.</p>	<p>The US6 Bridges Design Build Project extends east to the BNSF bridge and west to Sheridan Blvd.</p> <p>Updated traffic analysis included in the noise study.</p>		

Resource	FEIS and 2007 ROD		US 6 Bridges Design Build Project: What Has Changed	US 6 Bridges Design Build Project	
	Impacts of Preferred Alternative	Mitigation		Impacts of Project	Mitigation
Aesthetics and Urban Design	<p>Improvements to highway landscapes, retaining walls, lighting, signage, slope and ditch paving, and concrete barriers.</p> <p>Increased visibility of NB I-25 on ramp from NB Santa Fe Drive.</p>	<p>Use conceptual “kit of parts” in design of aesthetic elements and treatments. A “kit of parts” was developed during the EIS process and is described in the Final EIS and accompanying Aesthetics and Urban Design Report.</p> <p>Continue coordination with other agencies through final design and implementation.</p>	<p>Additional replacement of US 6 bridges over Bryant Street, I-25, and BNSF.</p>	<p>Bridge replacement at Bryant Street, which includes pedestrian traffic below US 6.</p> <p>Improvements to highway retaining walls, bridges, lighting, signage, slope and ditch paving, medians, signage, and landscapes.</p> <p>Large detention areas at US 6/I-25 interchange and north of US 6 east of Federal Boulevard.</p>	<p>Use conceptual “kit of parts” in design of aesthetic elements and treatments. A “kit of parts” was developed during the EIS process and is described in the Final EIS and accompanying Aesthetics and Urban Design Report.</p> <p>With CDOT involvement, continue coordination with other agencies and apply recommendations from the 2012 Aesthetics Technical Report, Appendix D, during final design and construction.</p>
Energy	<p>Increase in energy use due to construction.</p> <p>Decrease in fuel use due to decreased traffic congestion.</p>	<p>Consider energy conservation measures during final design.</p>	<p>No changes.</p>	<p>Same as FEIS/2007 ROD.</p>	<p>Consider energy conservation measures including: Implementing traffic management techniques that minimize motorist delays and vehicle idling; keep construction equipment well maintained; locate staging areas as close as possible to the project area; use the closest source for aggregates and other materials.</p>

Resource	FEIS and 2007 ROD		US 6 Bridges Design Build Project: What Has Changed	US 6 Bridges Design Build Project	
	Impacts of Preferred Alternative	Mitigation		Impacts of Project	Mitigation
Hazardous Materials	Several properties identified with potential or recognized environmental conditions to be acquired for ROW.	Conduct individual, site-specific ISAs of properties and coordinate with OPS and CDPHE, as necessary, before acquiring ROW.	Additional ROW required in order to implement the proposed design.	Full or partial acquisition and subsequent construction on six properties with potential or recognized environmental concerns creates the potential to encounter or release hazardous materials.	CDOT is conducting Phase II investigation at two locations 1) the area under/around the BNSF bridge and 2) the area around the location of the Tunnel / I-25 Bridge to further determine if soil/groundwater contamination is present in these areas. CDOT will provide the Contractor the Phase II report recommendations which the Contractor must follow during construction (from page 47 of Appendix H).
	Excavations may encounter contaminated groundwater, soil, and fill material, and in some locations methane.	Conduct a preliminary site investigation before final design to identify soil and groundwater contamination that may affect feasibility evaluation and final design.			
	Santa Fe, Alameda Avenue, US 6, and railroad bridges may be coated with lead-based paint.	Prepare a MMP and a HASP, which includes asbestos-containing material, as required by Section 250.03 of the CDOT Standard Specifications for Road and Bridge Construction.			
		Conduct an asbestos, heavy metals based paint survey of bridges, and miscellaneous material survey prior to demolition of any structures.			
			Construction in areas with potential or recognized environmental conditions may require handling and disposition of contaminated groundwater, soil, and fill material.	CDOT recommends that the Contractor conduct additional investigations on any properties that may pose a risk to construction workers and activities to further identify soil and groundwater contamination (Table 4 in Appendix H).	
			Dewatering activities may be required due to excavation and	Prepare a dewatering plan and obtain all required dewatering and remediation permits through CDPHE.	
				A lead based paint analysis was conducted on the five US 6 bridge structures. Lead based paint was detected on the two bridge structures over the BNSF railroad (see Hazardous Materials Technical Report, Appendix D). Workers on this project must follow CDOT Specification 250 - Environmental, Health, and Safety	

FEIS and 2007 ROD			US 6 Bridges Design Build Project: What Has Changed	US 6 Bridges Design Build Project	
Resource	Impacts of Preferred Alternative	Mitigation		Impacts of Project	Mitigation
				<p>other construction related ground disturbance.</p> <p>Lead-based paint located on bridge components encountered by workers could cause adverse health effect.</p> <p>Asbestos-containing materials located on bridge components encountered by workers.</p>	<p>Management during excavation activities at this site. This must include avoiding sanding, cutting, burning, or otherwise causing the release of lead from paint on these structures. If this is not possible, the lead must be abated properly in accordance with the MMP.</p> <p>Complete a project specific Materials Management Plan (MMP), to be reviewed and approved by CDOT, that details site-specific standard operating procedures regarding the identification, sampling, handling, and disposal of wastes that could be encountered during construction of this project.</p> <p>Complete a HASP, to be reviewed and approved by CDOT, to address potential wastes that could be uncovered during construction.</p> <p>Consult the U.S. Department of Labor OSHA Regulation 1926.62 for worker protection prior to work on these structures. Worker health and safety precautions in compliance with OSHA must be followed to limit worker exposure to lead. Work will be completed on these structures in accordance with CDOT Specification 250.04, as well as the MMP and HASP.</p>

FEIS and 2007 ROD			US 6 Bridges Design Build Project: What Has Changed	US 6 Bridges Design Build Project	
Resource	Impacts of Preferred Alternative	Mitigation		Impacts of Project	Mitigation
					<p>An asbestos analysis was conducted on the five US 6 bridge structures. No asbestos was found. If discovered during construction, comply with CDOT Specification 250.07 – Asbestos-Containing Material Management.</p> <p>A State Certified Asbestos Building Inspector (CABI) shall inspect for the presence of asbestos during subsurface work on potentially asbestos containing materials or when building/construction debris is encountered. If asbestos is found, all further work (soil-related) shall proceed in accordance with CDOT’s 250 spec, the Air Quality Control Commission Regulation No. 8 Part B, and the Colorado Department of Public Health and Environment Hazardous Materials and Waste Management Division Section 5.5 of the Regulations (6 CCR 1007-2).</p> <p>If abandoned landfills are present within 1,000 feet of construction activities, the Health and Safety Plan will need to include provisions for assessing and monitoring air quality at all utility trenches, drainage structures, and similar underground construction (i.e., caissons) areas prior to and during intrusive activities to ensure worker safety.</p>

5 Monitoring and Enforcement Program

Both FHWA and CDOT will monitor this Project to ensure mitigation measures contained in ROD2 (and subsequent permits) are implemented. The Mitigation Tracking Form in Appendix C will be used by CDOT and the Contractor to track implementation of commitments.

Copies of this ROD2 will be provided to responsible public agencies and CDOT project personnel. Commitments identified in Appendix C will be implemented through the inclusion of these measures in construction plans for the Project. CDOT will maintain information on the implementation to inform the public and/or interested commenting agencies, upon request, of the progress in carrying out the adopted mitigation measures.

Permits required for the Project will be coordinated with the appropriate jurisdiction and obtained prior to construction. Required permits and approvals for the Project are likely to include those shown in Table 15. Additional permits may be required for activities such as:

- Erosion control/grading
- Utility access, relocation, or surveying
- Construction, slope, and utility easements
- Access and authorizations

Table 15: Summary of Permits and Approvals Necessary for the Project

Agency	Regulated Activity	Permit/Approval
USACE	Impacts to jurisdictional wetlands and Waters of the US	CWA Section 404 Permit
Federal Emergency Management Agency (FEMA)	Floodplain encroachment	Conditional Letter of Map Revision (CLMR); Letter of Map Revision
CDPHE – Water Quality Control Division	MS4 Phase I and II Areas – New Development and Redevelopment Programs	Follow the requirements of the CCD and CDOT MS4 discharge permits
CDPHE – Water Quality Control Division	Required to assess the quality of stormwater runoff during construction	CDPHE Colorado Discharge Permit System (CDPS) stormwater permit associated with construction activity
CDPHE – Water Quality Control Division	Dewatering of construction areas	CWA Section 402 Construction Dewatering Permit, or Individual Construction Dewatering Permit if contaminated groundwater is expected to be encountered
CDPHE – Hazardous Materials and Waste Management Division	Classification of construction waste material and transportation of solid or hazardous wastes generated	May require facility approval and permits for storage, transportation, and disposal of solid or hazardous waste
CDPHE – Hazardous Materials and Waste Management Division	Generation of contaminated materials during construction	Coordination and approval for handling and management plan

Agency	Regulated Activity	Permit/Approval
CDPHE – Air Pollution Control Division	Emissions from portable units, such as rock crushers, generators, asphalt plants, and cement plants, used during construction.	Stationary Source Air Quality Permit
CDPHE – Air Pollution Control Division	Bridge demolition and asbestos abatement.	Demolition Notification Application Form/Asbestos Abatement
CDPHE – Air Pollution Control Division	Fugitive dust emissions due to construction activities and bridge demolition	Fugitive Dust Permit
CDOT	Generation of contaminated materials during construction	Development of MMP with approval by the Regional Planning and Environmental Manager
CPW	Impacts to stream banks, stream channels, and riparian areas	Senate Bill 40 Certification
CCD	Occupancy of ROW	Street Occupancy Permit
CCD	Construction of structures	Construction Permit
CCD	Traffic control during construction	Construction Access Permits Traffic Control Plan
CCD	Noise generation during construction	Noise Variance
CCD	Generation of contaminated materials during construction	Coordination and approval for handling and management plan
CCD	Discharge of wastewater generated during construction activities to the treatment works (if needed)	Wastewater Discharge Permit
CCD	Design and construction associated with City-maintained streets, parks, and sewers	Design and construction plan review
CCD Wastewater Management Division	Discharge of groundwater to a City storm sewer	Discharge Permit
CCD Parks and Recreation Department	Work in dedicated parks including the South Platte River Greenway and Trail	Occupancy Permit
CCD Forester	Tree removal	Coordination and approval

6 Public Outreach

6.1 Comments on the FEIS

The Notice of Availability for the FEIS was published in the Federal Register on November 17, 2006. A public hearing was held at the Drury Gymnasium (375 S. Zuni, Denver) on November 30, 2006. Comments were received from nine agencies and 16 members of the public before the comment period ended on December 15, 2006.

Comments were reviewed and responded to as part of the 2007 ROD. None of the comments received required a change to the assessment of the impacts, alternatives, or mitigation as presented in the FEIS and 2007 ROD.

In order to continue the coordination and communication as CDOT and FHWA work toward implementing the FEIS Preferred Alternative, the comments were reviewed again for the ROD2. Comments applicable to the Project have been included in Table 16 with additional responses.

Table 16: Comment Review and Response

Resource Category	Comment Number	Comment	Response
Transportation	1	"...Our access to 6 th Avenue W has been 'interesting,' so we look forward to this project improving that route. Also, the Bryant Street interchange in its current form is ridiculous. Glad to see that as part of this initiative."	The planned modifications at Bryant Street have not changed since the FEIS and 2007 ROD. The Project will remove the WB and EB US 6 to Bryant Street ramps and add access to/from the Federal Boulevard slip ramps.
Transportation/ Access	3	A business owner at 525 Bryant wanted more details about the closure of Bryant. She was concerned about how people would access her business.	The line drawing and the simulation of the Preferred Alternative at US 6 and Federal Boulevard were sent to her during the FEIS process. The planned access modifications at Bryant Street have not changed since the FEIS and 2007 ROD.
Noise	4	"...I'm very happy to see there are to be no sound walls along 6 th Ave. I hate sound walls. I also have concerns about noisy all night construction."	The Project does not include any new noise walls. During construction, the Contractor will be required to comply with Denver code, which regulates daytime and nighttime noise levels.

Resource Category	Comment Number	Comment	Response
Traffic	15	<p>“...they are planning on sending all the traffic out of the Bryant Street area up to Federal, across the Federal bridge and then back on to 6th Avenue either way, and that means an awful lot of traffic going up on to Federal just to get on the ramp. And I think that is probably overloading Federal, because it is already pretty loaded. I don’t think they planned that out too well.”</p> <p>“...take Bryant Street and go straight from 7th over to 8th Avenue, just condemn the property and put in a street like it is supposed to be so we can have a normal street down there and that will put on the traffic on Bryant straight and go on 8th and over to I-25 and out that way, and it would take the traffic problem off Federal and 6th Avenue.”</p> <p>It just makes sense to me because you are just loading up Federal, to load up 6th, to load up or just get on to 25 SB or NB and you can do it the other way by getting on 8th Avenue and take the loading off of 6th and the loading off of Federal.”</p>	<p>The impacts to the Federal Boulevard/US 6 intersection were analyzed and are reported in Appendix L. Overall intersection LOS is expected to improve, and delays are expected to decrease, from building the Project, as compared to future operations without the Project.</p> <p>Modifications to Bryant Street from 7th to 8th Avenues were not included in the scope of the Project because they did not directly relate to the purpose and need.</p>

6.2 Current Project Public Outreach

More than 100 businesses in the Project area were visited in July and August 2012 to share Project information, gather contact information, collect questions, and talk about Project-related business and property owner concerns. This outreach was communicated in both Spanish and English. Most of the concerns and questions from stakeholders dealt with property and construction impacts and access issues.

A public open house was hosted on September 12, 2012 at Barnum Recreation Center and was attended by more than 60 stakeholders. Pre-meeting publicity included two e-newsletters sent to more than 200 stakeholders, in-person notice during the July and August visits to business owners, and a news release distributed to the Denver area news media. The purpose of the meeting was to update the public on the progress of constructing Phases 1 and 2 of the FEIS Preferred Alternative and inform them of the proposed improvements associated with the Project. Display stations provided information on the Project construction process, project elements, and more details on the impacts to traffic, environmental review process and ROW acquisition process. Project staff answered questions and recorded comments received at the display stations. The majority of the comments and questions were about the project schedule and contracting process, and they have been considered in this ROD2.

CDOT has created a public project website (<http://www.coloradodot.info/projects/US6Bridges>) where it has posted project materials including information presented at the public open house.

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7 Decision

Based on the information contained in the I-25 Valley Highway Final EIS and Section 4(f) Evaluation, the 2007 ROD, and this ROD2 (including the Environmental Reevaluation), FHWA concludes that the decision reached on the US 6 Bridges Design Build Project is in the best overall public interest, uses all practicable means to restore and enhance the quality of the human environment, and avoids or minimizes any possible adverse effects. Based on the considerations identified in the Section 4(f) Evaluation, FHWA also concludes that there are no feasible and prudent alternatives to the use of Section 4(f) protected lands and that the proposed action includes all possible planning to minimize harm to the identified Section 4(f) properties resulting from such use.

John Cater
Division Administrator, Colorado Division
Federal Highway Administration

Date