

# COLORADO DIVISION OF WILDLIFE

STATE OF COLORADO

Bill Owens, Governor  
DEPARTMENT OF NATURAL RESOURCES  
**DIVISION OF WILDLIFE**  
AN EQUAL OPPORTUNITY EMPLOYER

Bruce McCloskey, Acting Director

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May 10, 2004

Mr. Richard Annand  
Colorado Department of Transportation  
P.O. Box 536  
Pueblo, Colorado. 81002

Re: Environmental Assessment and Draft 4(f) Evaluation for I-25 Improvements through the Colorado Springs Urbanized Area.

Dear Mr. Annand,

1....The Division has reviewed your request for comment on the above referenced environmental assessment (EA) and  
2 is familiar with the scope and site of the project. The proposed project includes I-25 widening from State Highway  
3...(SH) 105 south to SH 16 with major interchange construction to take place on Baptist, Northgate, North Powers  
4 Extension, North Nevada/Rockrimmon, Fillmore, Bijou and Cimarron exits. Six lane highway widening will take  
5...place from SH 105 south to Briargate Interchange and from Martin Luther King (MLK) Bypass south to South  
6 Academy Interchange. I-25 from Briargate Interchange to MLK Bypass will be widened to eight lanes which  
7...includes two carpool lanes. Our review of your project plans indicates the activity necessary and prudent; however,  
8 we have a few comments and suggestions for your consideration.  
9.....  
10 We believe that *Section 3: Impacts and Mitigation* contains most of the appropriate ecological information to  
11...properly assess the impacts of the proposed project. However, there seems to be a lack of detail in regard to  
12 number, size and location of:  
13.....

- 14 • Detention facilities
- 15 • In-channel stream structures

  
16 Another issue that was touched on in the EA, but without details regarding CDOT intentions, is the idea of  
17...improving stream crossings to allow safe wildlife movement east-west in the proposed project corridor. Currently,  
18 we have documented two wildlife crossings in the proposed project area; one at the Rockrimmon Exit and one west  
19..of I-25 (a north/south corridor) on Northgate Road. Also, historically we have had road kill incidents south of the  
20 Northgate Exit that could be alleviated with more permeable stream crossings on Smith and Monument Branch  
21..Creek. We recommend either a bridge crossing or bigger Concrete Box Culverts (CBC's) at these locations to  
22 facilitate big game movement and to minimize wildlife/vehicle conflicts.  
23.....  
24 The mitigation section under threatened and endangered species requires off site mitigation for Preble's Meadow  
25..Jumping Mouse (PMJM). The Division could not find reference to two linkage corridors or the 50 acre permanent  
26 easement for PMJM that was delineated by the USFWS Biological Opinion. We would request clarification as to  
27...whether these mitigation requirements will be incorporated as part of this EA?

DEPARTMENT OF NATURAL RESOURCES, Russell George, Executive Director  
WILDLIFE COMMISSION, Philip James, Chair • Jeffrey Crawford, Vice-Chair • Brad Phelps, Secretary  
Members, Bernard Black • Tom Burke • Rick Enstrom • Claire O'Neal • Robert Shoemaker • Ken Torres  
Ex Officio Members, Russell George and Don Arment

## RESPONSE

Lines 10-12: The exact size and location of detention facilities and in-channel stream features has not yet been determined. The Proposed Action has been developed only to the concept design level to date. The final design process will determine the site details.

Lines 16-22: The anticipated hydraulic crossings for streams in northern El Paso County are identified on page 25 of the Programmatic Biological Opinion approved by the U.S. Fish and Wildlife Service. Anticipated activities at Smith Creek include extending the existing side-by-side concrete box culverts on the east (i.e. northbound) and west (southbound) sides of I-25 and constructing new CBCs under new ramps, with a detention pond in the median. At Monument Branch, the Biological Opinion describes extension of separate culverts on the east and west sides of I-25. The existing Rockrimmon interchange will be reconstructed in accordance with the configuration depicted in EA Appendix 1, *Traffic Analysis Technical Memorandum*, at page 5. There will be opportunities during the final design process to explore how best to accommodate wildlife crossings while meeting hydraulic requirements and minimizing impacts to riparian habitats and Preble's mouse habitat.

Other than the Rockrimmon interchange area, all other locations specified in this comment are on United States Air Force property. Consultation will be undertaken with the Air Force Academy to ensure that the I-25 final design is consistent with their wildlife management objectives.

Lines 24-27: The two habitat linkages and the 50 acres of additional offsite habitat protection that are discussed in the Programmatic Biological Opinion are discussed on page 3-104 of the EA, which states that "[m]itigation for the Proposed Action will be implemented in accordance with the Biological Opinion." This statement incorporates the mitigation measures from the B.O. into the Environmental Assessment.

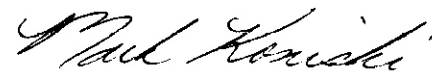
# COLORADO DIVISION OF WILDLIFE

1...The Division is also concerned with the lack of wildlife references in *Section 4 Cumulative Impacts*. Two species  
2 that occupy habitat in close proximity to the proposed project will likely experience adverse cumulative impacts.  
3...First, the proposed project spans the known occupied PMJM habitat in El Paso County and the project could have  
4 major impacts to movement of mice. How do impacts by the proposed project address long term conservation  
5...strategies? Including but not limited to:  
6

- 7..... • Connectivity.
- 8..... • Genetic diversity.
- 9..... • Overall population.
- 10..... • El Paso County's habitat conservation planning effort.

11..Secondly, we believe the potential effects of this project to downstream water quality and quantity and its potential  
12 impact to Arkansas darter and other native fish assemblages should be addressed. We are also concerned with in-  
13..channel stream structures posing a barrier to fish movement in streams.  
14  
15..The Division has concerns with *Section 6 Draft Section 4 (f) Evaluation* as it pertains to PMJM impacts. We  
16 believe that the alternative analysis that was conducted could have included more wildlife evaluation, specifically  
17..PMJM trap site data. Our records show that there are three trap sites that show a relatively high number of mice  
18 present in the Smith Creek drainage both east and west of I-25. Based on that information, we recommend the  
19..proposed ramps at the Northgate Interchange include bridged alternatives for evaluation as part of the EA process.  
20 The Division feels that bridges would lessen the adverse impact to PMJM at this location and improve permeability  
21..for wildlife. The CBC alternative increases travel distance for mice and reduces the amount of riparian  
22 establishment along this reach of Smith Creek.  
23.....  
24 Under *Section 7 Wetland Finding*, the Division suggests delineating wetland type associated with corresponding  
25..wetland impact or providing wetland delineation field forms as an appendix to the EA. This will help measure  
26 CDOT's success at mitigation wetland impacts in-kind and on-site throughout the course of the proposed project.  
27..The Division understands that mitigation ideas are currently conceptual. We suggest that mitigation ideas on  
28 Monument Creek and Pine Creek avoid, to the greatest extent practical, pond mitigation unless impacts associated  
29.. with the proposed project include pond wetland impacts.  
30  
31..The Division appreciates having this opportunity for input. Please feel free to contact Casey Cooley, Habitat  
32 Biologist at (719)227-5227, should you have questions or concerns.

Sincerely,



Mark Konishi  
Southeast Regional Manager

Cc:

Dave Clippinger, Area Wildlife Manager  
Bruce Goforth, Southeast Habitat Manager  
Doug Krieger, Southeast Aquatic Manager

## RESPONSE

Lines 1-9: Cumulative impacts to Preble's meadow jumping mouse habitat are presented in the Programmatic Biological Opinion (EA Section 8), the Biological Assessment prepared by CDOT (included in EA Appendix 5) and were also examined in considerable detail in EA Appendix 9, *Sustaining Nature and Community in the Pikes Peak Region*. If the topic seems underemphasized in Section 4, this is because the subject had already been thoroughly addressed in the Section 3 of the EA.

Lines 11-13: The EA discussion of water quality on pages 3-88 and 3-89 was incorrect and was of concern to many reviewers, prompting preparation of a clarification that appears in Section 7 of this FONSI. The point of that clarification is that due to legally required mitigation measures for highway runoff, the Proposed Action would not be expected to cause or contribute to exceedances of any Federal or State water quality standard. Compliance with new storm water runoff treatment requirements not only by CDOT but also by the City of Colorado Springs, El Paso County and local municipalities clearly will benefit aquatic life downstream. Regarding in-channel stream structures, CDOT will work with CDOW in the project final design process to ensure that fish movement would be facilitated.

Lines 15-22: The final design process will afford opportunities to consider further ways to avoid and minimize impacts to Preble's habitat, consistent with the Programmatic Biological Assessment. Again, as noted above, the Smith Creek crossing of I-25 is on Air Force Academy land, so these decisions will be coordinated with the Academy.

Lines 24-29: Monitoring of wetland impacts by wetland type is a routine part of the Section 404 permitting process under the jurisdiction of the U.S. Army Corps of Engineers. Avoidance of pond creation along Monument Creek, as suggested in the comment, was already a guiding principle established in response to concerns from the Air Force Academy that new bodies of open water could contribute to the potential for bird/aircraft strike hazards in the vicinity of Air Academy flight paths.