



U.S. Department  
Of Transportation  
**Federal Highway  
Administration**

**Colorado Federal Aid Division**  
12300 West Dakota Avenue  
Suite 180  
Lakewood, CO 80228

August 16, 2004

Mr. Don Klima  
Advisory Council for Historic Preservation  
12136 West Bayaud Avenue, Suite 330  
Lakewood, CO 80228

File: 12210

Dear Mr. Klima:

Subject: Request for Review of Effect Finding, Project IM 0252-316,  
I-25 Environmental Assessment: Improvements Through the  
Colorado Springs Urbanized Area, El Paso County, Colorado (SA 12210)

This letter and the attached materials constitute the Federal Highway Administration's request that the Advisory Council for Historic Preservation review a disagreement with the CLG of Colorado Springs over an effects finding for the historic Monument Valley Park (5EP613). Monument Valley Park is associated with the project referenced above. The disagreement with the CLG is primarily based on noise and visual effects to the historic Monument Valley Park. We request that you provide an opinion as to whether FHWA correctly applied the criteria of adverse effect with regard to this historic park. FHWA makes this request in accordance with the revised Advisory Council on Historic Preservation's regulations as described in 36 CFR Part 800.5(c)(2)(i).

#### Description of Undertaking

The purpose of the proposed corridor improvement project is to relieve existing traffic congestion and address projected future congestion on I-25 within the Colorado Springs urbanized area. I-25 is the only existing freeway and the primary north-south route serving more than a half-million residents of fast-growing El Paso County, including the Colorado Springs Urbanized Area. Peak-hour traffic conditions on I-25 in central Colorado Springs were unacceptably congested (Level of Service E or F, in traffic engineering terms) on 99 percent of all normal weekdays in 1998. Projected regional population growth will add more than 200,000 new residents by the year 2025. Without additional capacity, existing I-25 congestion will increase both in daily hours of duration and in total miles affected. Under the 2025 No-Action Alternative, all 26 miles of the corridor would be congested (Level of Service E or F) in either the morning peak period or the evening peak period or both.

The proposed project in the area of concern will be adding interstate traffic capacity that will result in four through lanes in both directions. No additional right-of-way is needed to add the through lanes, which will be constructed in the median of the existing highway. No additional right-of-way is needed to construct the sound barriers that are required according to CDOT's Noise Analysis and Abatement Guidelines.

### Section 106 Consultation

As part of the Section 106 consultation for the project, the Federal Highway Administration (FHWA) submitted the Historic Resources Survey reports to the State Historic Preservation Officer (SHPO); the Colorado Springs Parks, Recreation, & Cultural Services Department; the United States Air Force Academy; and the Colorado Springs Historic Preservation Board (CLG) in various submittals between December 2003 and January 2004. Copies of the relevant correspondence associated with this consultation are attached for your review.

In the effects and mitigation volume of the Historic Resources Survey for this project, FHWA submitted effects determinations for the section of Monument Valley Park (5EP613) between Fontanero and Uintah and between Uintah and Bijou Streets along Interstate 25. The pertinent findings have been summarized for your convenience below. Additional information about the effects findings is also located in the enclosed technical reports.

### **Summary of Eligibility Determination of Monument Valley Park**

Monument Valley Park was surveyed in 1985 and was officially determined not eligible. Since then, the original park features and WPA work have gained in architectural and historical significance. The park is currently eligible under criteria (a) and (c). The park is recognized as a very important resource in Colorado Springs for its association with General Palmer and the history of the city, for its landscape design, and the design and history of its features. All of the features from the Palmer and WPA periods are considered contributing to the park and have retained their integrity, despite changes in the surroundings since General Palmer planned the park.

### Summary of Effects Findings to Monument Valley Park

This project will have no direct impacts to Monument Valley Park. The improvements do not directly encroach upon or take land, buildings, or features from any part of the park. Indirect impacts are associated with proximity effects such as traffic noise and changes in visual characteristics and setting. Noise and visual impacts to Monument Valley Park were evaluated as part of the Historic Survey Report.

### *Monument Valley Park, Fontanero to Uintah*

Between Fontanero and Uintah, the park includes a playground, soccer field, track field, and recreational trails. Even though these features do not contribute to the historic significance of the park, they do not disturb the integrity because they are in keeping with the park's original intent for recreation and relaxation. Contributing historic features between Fontanero and Uintah in this section include WPA walls along Monument Creek, the Geologic Column with three bridges and a canal, the San Miguel rockwork entrance and pond with an island, and the Columbia Street park entrance with stairs and a bench.

For the portion of the park north of Uintah, a 50-foot segment of the recreation trail on the extreme western border of the park at Recreation Way will be subject to noise above 66 decibels. At this location, there are no other park features or uses. To evaluate the effects of noise on the trail, the federally approved CDOT Noise Analysis and Abatement Guidelines was used. The threshold of 66 decibels, which is about the noise level of a normal conversation, is the criterion being used to assess how noise affects the integrity of the historic property. The short segment of trail will be exposed to noise levels in excess of 66 decibels, however the trail is not a contributing feature. FHWA determined that the highway improvements in this stretch of the

project will not have an effect on the setting of the historic park and thus made a determination of *no historic properties affected*. This finding was presented to the State Historic Preservation Officer (SHPO) in correspondence dated January 8, 2004, and the SHPO concurred with this finding in correspondence dated February 2, 2004.

Because of CDOT's Noise Analysis and Abatement Guidelines, noise mitigation measures were still considered in consultation with the City of Colorado Springs Parks, Recreation, and Cultural Services Department; the Recreation staff; the Friends of Monument Valley Park; and the Parks and Recreation Advisory Board. The three mitigation strategies considered were the construction of a noise wall, a noise berm, or a combination wall and berm. None of these strategies were supported by the groups listed above and were ultimately determined to be not feasible or reasonable in accordance with the CDOT Noise Analysis and Abatement Guidelines.

#### *Monument Valley Park, Uintah to Bijou*

In this segment of the park, contributing historical features include Duck Pond and Willow Haven, Palmer's office and greenhouses, Shadow Lake, Penrose Pavilion, Penrose bathhouse and swimming pool, baseball field and stands, Carlton Band Shell, rock entrances at Bijou Street and Willamette, and various dry-laid walls built both as original park features in 1904-1907 and by the WPA after 1935. In addition, the WPA floodwall lining Monument Creek, and the Art Deco Cache la Poudre Street Bridge are contributing historical features.

In the area of Monument Valley Park south of Uintah, noise projections along the western edge of the park were modeled at 70 decibels, which is above the 66-decibel threshold identified in the CDOT Noise Analysis and Abatement Guidelines. In response to this increase, FHWA and CDOT investigated proposed noise mitigation strategies with the Colorado Springs Parks, Recreation, and Cultural Services staff, as well as the Friends of Monument Valley Park. As a result, FHWA and CDOT will construct three noise walls along the highway to reduce the increased noise levels, and areas where noise walls were not feasible, landscaping will be included as part of the undertaking. These park mitigation measures will be built as part of the project— as required by CDOT's Noise Analysis and Abatement Guidelines— to protect the park. FHWA and CDOT met with representatives of SHPO in May 2003 to discuss the noise and visual effects to the park, and, at that time, SHPO unofficially concurred that the proposed park mitigation would protect the contributing features of the park, and that the presence of the barriers would have little negative impact to the visual setting of the park. FHWA determined that there would be *no adverse effect* to the park based on noise, and also found that the construction of the landscaping and sound barriers along the western edge of the park would result in *no adverse effect* to the park's historic integrity. These findings were presented to the SHPO, and SHPO concurred in correspondence dated February 2, 2004.

#### Summary

In correspondence dated February 6, 2004, the CLG responded to FHWA and CDOT that it did not concur with the effects findings for Monument Valley Park in the Fontanero to Uintah and Uintah to Bijou segments. Although FHWA and CDOT provided a response to the CLG on February 27, 2004, this letter did not address the disagreement over the effects findings for Monument Valley Park.

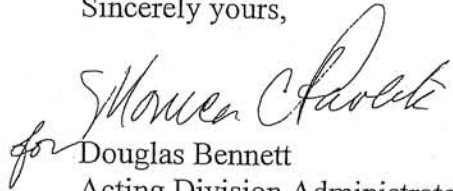
FHWA believes the effects determinations for Monument Valley Park from Fontanero to Uintah and from Uintah to Bijou are still appropriate. The analysis indicates that the increase in noise levels to the park will not affect the significance of the historic park in the Fontanero to Uintah

section and will not adversely affect the park in the Uintah to Bijou section. FHWA also determined that there will be no decreased visibility from the park as a result of these noise mitigation measures that are included as part of the project in accordance with CDOT's Noise Analysis and Abatement Guidelines. In addition, we believe we have correctly applied the criteria of adverse effect as outlined in 36 CFR 800.5(a)(1).

We hereby request your comment and opinion on the application of adverse effect for Monument Valley Park. Your response is necessary for the Federal Highway Administration to comply with Section 106 of the National Register Preservation Act (as amended) and with the Advisory Council on Historic Preservation regulations.

If you have questions or require additional information in order to complete your review, please contact Chris Horn, (720) 963-3017, or Monica Pavlik, (720) 963-3012, at FHWA. Enclosed are the correspondence letters, the site form for Monument Valley Park, the Historic Resources Survey Reports, Volume I and Volume II for the project and the CDOT's Noise Analysis and Abatement Guidelines.

Sincerely yours,

  
for Douglas Bennett  
Acting Division Administrator

Enclosures

I-25 Colorado Springs Environmental Assessment Historic Resources Survey Report Volume I and Volume II

Copies of Section 106 consultation correspondence

Copy of Site form for Monument Valley Park (5EP613)

CDOT Noise Analysis and Abatement Guidelines

cc: Dick Annand, CDOT Region 2  
Brad Beckham, CDOT Environmental Programs Branch  
Georgianna Contiguglia, Colorado SHPO  
Tim Scanlon, Colorado Springs Historic Preservation Board  
Nancy Brown, Colorado Springs Historic Preservation Board  
Tim Blevins, Penrose Library  
Jessy Randall, Tutt Library  
Matt Mayberry, Pioneer Museum  
Western Museum of Mining and Industry  
Cathy Mundy, UCCS librarian  
Joyce N. Stivers, Historic Preservation Alliance  
Jan Prowell, Friends of Monument Valley Park  
Patricia Doyle, Old North End Historic Preservation Committee  
Judith Rice-Jones, UCCS librarian  
Paul Butcher, CO Springs Parks Dept.  
Lt Colonel Mohsen Parhizkar, USAF Academy  
Shared Directory:/mpavlik/ACHP Disagreement letter.jmc