



Preserving America's Heritage

September 8, 2004

Douglas Bennett
Federal Highway Administration
12300 West Dakota Avenue
Suite 180
Lakewood, CO 80228

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

Dear Mr. Bennett:

On August 16, 2004 we received your letter requesting our views on whether the Federal Highway Administration (FHWA) has correctly applied the criteria of adverse effect with regard to the historic Monument Valley Park (5EP613) for the referenced project. We have reviewed the materials provided, and agree with FHWA's findings regarding the effects of this undertaking on historic properties. FHWA and CDOT propose to improve traffic capacity on I-25 in Colorado Springs by adding additional through lanes, to be constructed in the median of the existing highway. In consultation with the Colorado State Historic Preservation Officer (SHPO), Colorado Springs Parks, Recreation & Cultural Services Department; the U.S. Air Force Academy; and the Colorado Springs Historic Preservation Board (CLG), you have determined that this undertaking may have an adverse effect on three historic properties: the United States Air Force Academy (5EP595), the WPA flood wall on Monument Creek (5EP3856), and the Bijou Street entrance at the Monument Valley Park (5EP613). A Memorandum of Agreement (MOA) has been prepared, and is currently circulating for signature, for the effects of the undertaking on these properties.

CDOT's noise analysis for this undertaking indicates that noise impacts will occur only in one portion of the Monument Valley Park, along the western edge, south of Uintah. FHWA and CDOT followed the CDOT Noise Analysis and Abatement Guidelines and propose to reduce the noise impact by building three noise walls along the highway to reduce the increased noise levels,

ADVISORY COUNCIL ON HISTORIC PRESERVATION

12136 West Bayaud Avenue, Suite 330 • Lakewood, Colorado 80228
Phone: 303-969-5110 • Fax: 303-969-5115 • achp@achp.gov • www.achp.gov

and areas where noise walls are not feasible, landscaping will be included as a barrier. The SHPO disagreed with FHWA's initial finding that there would be "no adverse effect" to Monument Valley Park, because of changes to the Bijou Street entrance, a contributing feature to the historic park. FHWA changed its determination and included mitigation measures for the Bijou Street Entrance in the MOA for this undertaking. SHPO did not object to the finding that noise impacts resulting from new construction would not result in an adverse effect to the historic Monument Valley Park

The CLG, however, in a letter dated February 6, 2004, objected to your finding regarding Monument Valley Park, specifically because of the prospect of increased noise and decreased visibility of the historic views of the Front Range from Monument Valley Park. As noted in your letter and supporting documentation, noise projections along the western edge of the Monument Valley Park south of Uintah were modeled at 70 decibels, a level above the 66-decibel threshold identified in the CDOT Noise Analysis and Abatement Guidelines. CDOT and FHWA propose to use landscaping and sound barriers to abate this noise impact. The historic park is already located close to I-25 and between the park and the Intestate are Monument Creek, railroad tracks, and industrial buildings. Athletic facilities in the area of the park that may be affected by increased noise do not contribute to the historic significance of the park. There are no historic buildings or structures located in this particular area of the park, and CDOT proposes to construct noise walls and landscaping to reduce the noise to acceptable levels in keeping with its Noise Assessment and Abatement Standards. We must therefore agree that there will be no adverse effect based on noise impacts. Any increased noise resulting from this undertaking will be effectively abated through the measures proposed, and there is no indication that the view from the park to the Front Range will be significantly altered. We therefore agree with FHWA that the noise created by improvements to I-25 will not diminish the characteristics that qualify the Monument Valley Park for eligibility to the National Register of Historic Places.

Thank you for requesting our views on this issue. If you need further assistance please feel free to call Carol Legard at 303-969-5110 or via email at clegard@achp.gov.

Sincerely,



for Don L. Klima
Director
Office of Federal Agency Programs

Cc:
Dan Corson, CO SHPO
Nancy Brown, Colorado Springs Historic Preservation Board
Lisa Schoch, CDOT