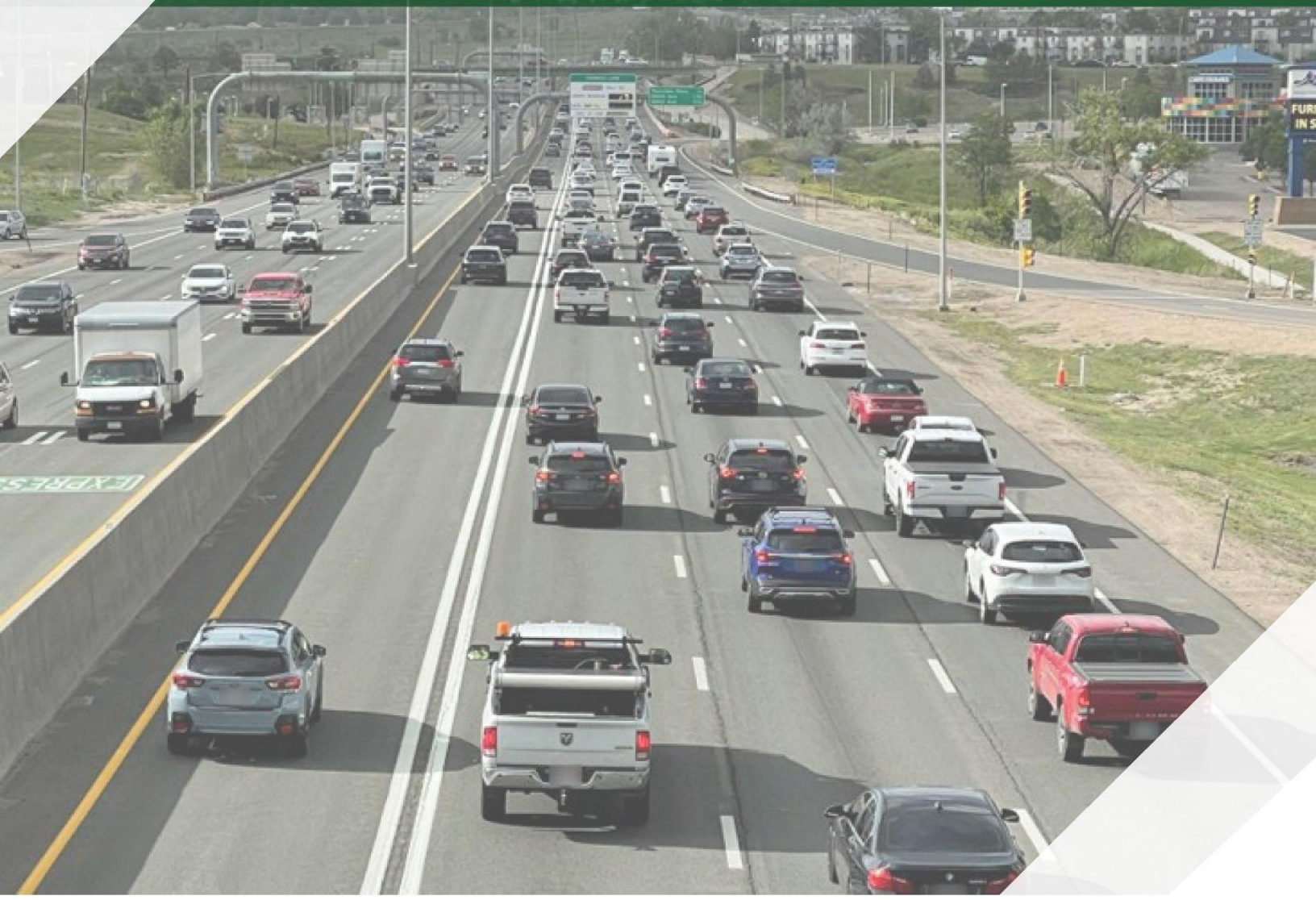
I-25 (US 36 to 104th Avenue)

Safety and Operations Improvements Project



Appendix D10: Visual Impact Assessment Technical Memorandum

September 2026

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Appendix D10. Visual Impact Assessment Technical Memorandum

September 16, 2026 – Version 7
Project Number: PM 0253-299
Subaccount Number: 25563

Contents

Acronyms and Abbreviations ..... **ii**

1.0 Introduction and Background **1**

2.0 Regulatory Setting **3**

3.0 Methodology **4**

4.0 Existing Conditions **5**
4.1 Area of Visual Effect 5
4.2 Context and Visual Inventory 9
4.2.1 Landscape Character 9
4.2.2 Viewers 9
4.2.3 Visual Quality 9

5.0 Environmental Consequences **10**
5.1 No Action Alternative Impacts 10
5.2 Proposed Action Alternative Impacts 10
5.2.1 Permanent Impacts 10
5.2.2 Temporary Impacts 12

6.0 Mitigation **18**

7.0 Required Permits and Clearance Needs **21**

8.0 References **22**

Attachments

Attachment A. Project Information
Attachment B. Visual Resources Scoping Documentation

Figures

Figure 1. Project Limits 2
Figure 2. Area of Visual Effect 6
Figure 3. Representative Views from Viewsheds 1-4 7
Figure 4. Map of Anticipated Impact Areas 13
Figure 5. Views from Anticipated Impact Areas 14

Tables

Table 1. Mitigation Commitments 18

Acronyms and Abbreviations

Acronym or Abbreviation	Full Name
AVE	Area of Visual Effect
CDOT	Colorado Department of Transportation
EIS	Environmental Impact Statement
FHWA	Federal Highway Administration
I-25	Interstate 25
I-70	Interstate 70
I-76	Interstate 76
I-270	Interstate 270
NB	northbound
NEPA	National Environmental Policy Act
ROW	Right-of-Way
ROD1	Record of Decision 1
RTD	Regional Transportation District
SB	southbound
US 36	United States Highway 36
VIA	visual impact assessment

1.0 Introduction and Background

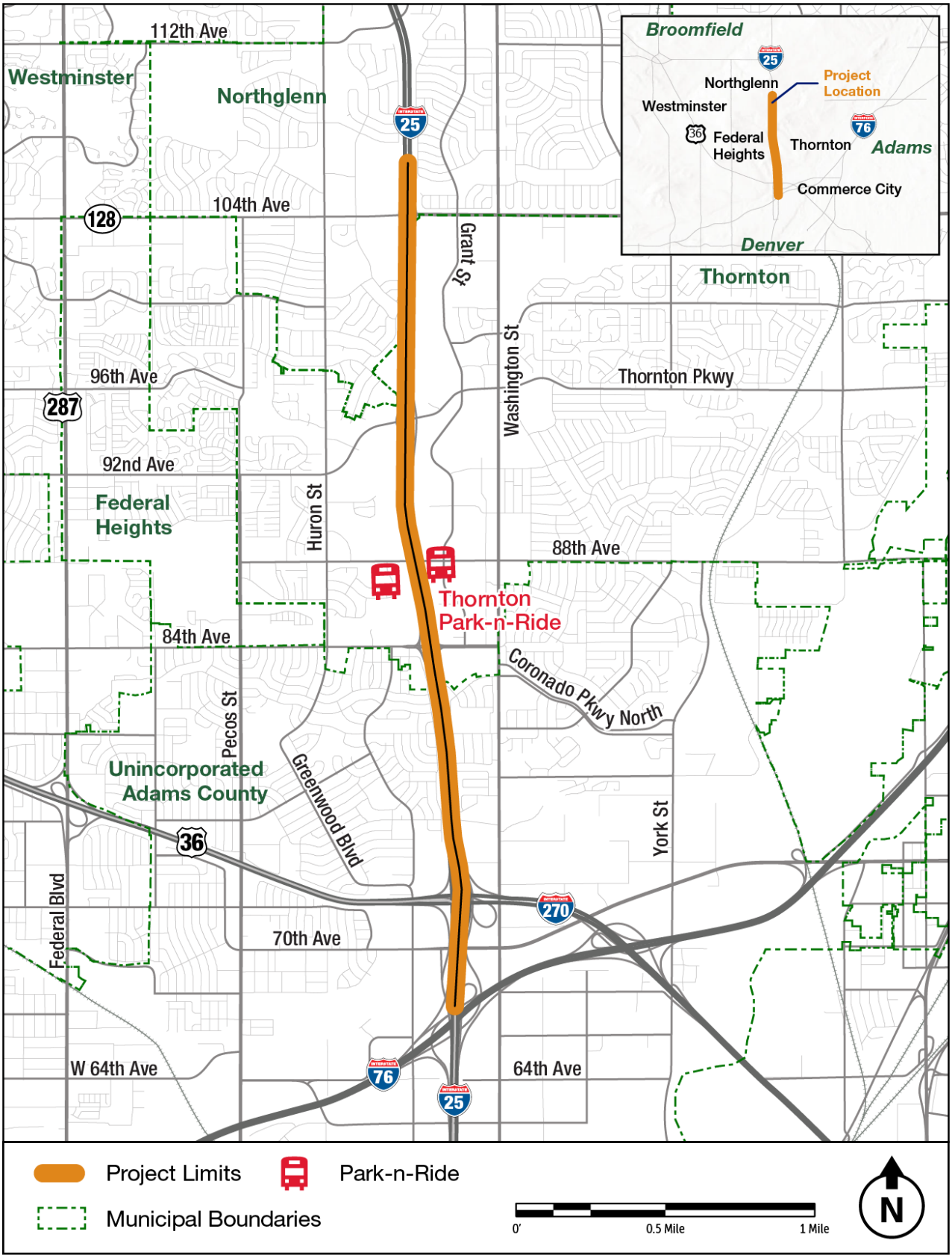
The Colorado Department of Transportation (CDOT) and the Federal Highway Administration (FHWA) are proposing transportation improvements to Interstate 25 (I-25) between United States Highway 36 (US 36)/I-270/I-76 interchange and 104th Avenue (**Figure 1**). This Visual Impact Assessment (VIA) Technical Memorandum was prepared to support evaluation of the I-25 (US 36 to 104th Avenue) Safety and Operations Improvements Project (the project).

CDOT has previously completed an Environmental Impact Statement (EIS) and other planning efforts that recommended improvements to this segment of I-25. The current project evaluates proposed transportation improvements that reflect and build upon previous recommendations. Because the current project includes elements that were not evaluated and approved in the **North I-25 Record of Decision 1** (ROD1) (FHWA and CDOT, 2011), this project is undergoing new evaluation under the National Environmental Policy Act (NEPA).

The following project information can be found in **Attachment A**: Project Information:

- Project History
- Project Limits
- Purpose and Need
- Proposed Action Description

Figure 1. Project Limits



2.0 Regulatory Setting

No federal, state, or local regulations affecting visual resources apply.

3.0 Methodology

This VIA follows the CDOT Visual Impact Assessment (VIA) Guidelines (CDOT 2020). The VIA Guidelines start with a scoping process to highlight visual resource issues to determine the appropriate level of study for compliance with the National Environmental Policy Act (NEPA).

VIA scoping findings are documented through CDOT's Visual Resource Scoping Documentation (**Attachment B**), which includes a detailed summary of:

- Visual attributes of the Proposed Action
- Landscape context
- Issues and regulatory framework
- Level of VIA documentation (and the related scoping questionnaire)

This VIA is being documented as a Memorandum according to the results of the Visual Resource Scoping Documentation, because the project's visual changes would have high compatibility with the surrounding community visual character and a moderate level of noticeable visual change.

The project team conducted an inventory of landscape character, viewers, and visual quality to understand the visual context and define a visual study area for the project. The team then evaluated the potential for permanent and temporary visual impacts based on the visual contrast of new project features with the surrounding visual context.

4.0 Existing Conditions

4.1 Area of Visual Effect

The visual impact of the existing highway on nearby residents and pedestrians is minimized through aesthetically integrated infrastructure, noise walls, and topography that shield the view of traffic. This observation is discussed in greater detail in the Visual Resource Scoping Documentation (**Attachment B**). As a result, the visual study area for the project, known as the Area of Visual Effect (AVE), focuses on key viewpoints from the highway and the limited set of views of the highway from adjacent properties that could be affected by the project.

The development of the AVE considered views for I-25 travelers in the foreground (up to 0.25 to 0.5 miles), middle ground (extending up 3 to 5 miles), and background (extending to infinity) as defined by CDOT's 2020 VIA Guidelines. **Figure 2** depicts the AVE. Foreground and middle ground are shaded in purple and represent views both to and from I-25, while background views for the AVE are labeled as viewsheds. Views of the highway for adjacent recreational and residential viewers are represented in the purple shading.

The AVE is generally contained within 500 feet of the highway because most views to and from the highway are screened by noise walls or changes in topography. Exceptions to this comprise Niver Creek Open Space, Civic Center Park, Regional Transportation District's (RTD) Thornton Park-n-Ride, the Olinger Cemetery, and the I-25/I-270 interchange, where views extend into the middle and background.

The primary visual resources within the corridor include background views to the south of downtown Denver and to the west of the Rocky Mountains. While mountain views from the highway are present through most of the corridor, only a few locations have high quality direct views of the mountains. **Figure 2** shows symbols (labeled 1-4) to represent viewsheds included in the AVE. **Figure 3** is a set of representative images of these viewsheds, including:

- Viewshed 1: Southbound travelers' view of the Rocky Mountains to the west of I-25 north of Thornton Parkway.
- Viewshed 2: Southbound travelers' view of the Rocky Mountains to the west and downtown Denver to the south on the south side of Thornton Parkway.
- Viewshed 3: Southbound travelers' view of the Rocky Mountains to the west where Niver Creek Open Space parallels I-25.
- Viewshed 4: Southbound travelers' view of downtown Denver near 78th Avenue.

Views of the highway are considered in this analysis in specific locations. These locations include Niver Creek Trail and Open Space, Civic Center Park, and residences along Grant Way. These locations were identified as the only views of the highway with potential impacts from the project. The impacts to these locations are defined in the next section.

Figure 2. Area of Visual Effect

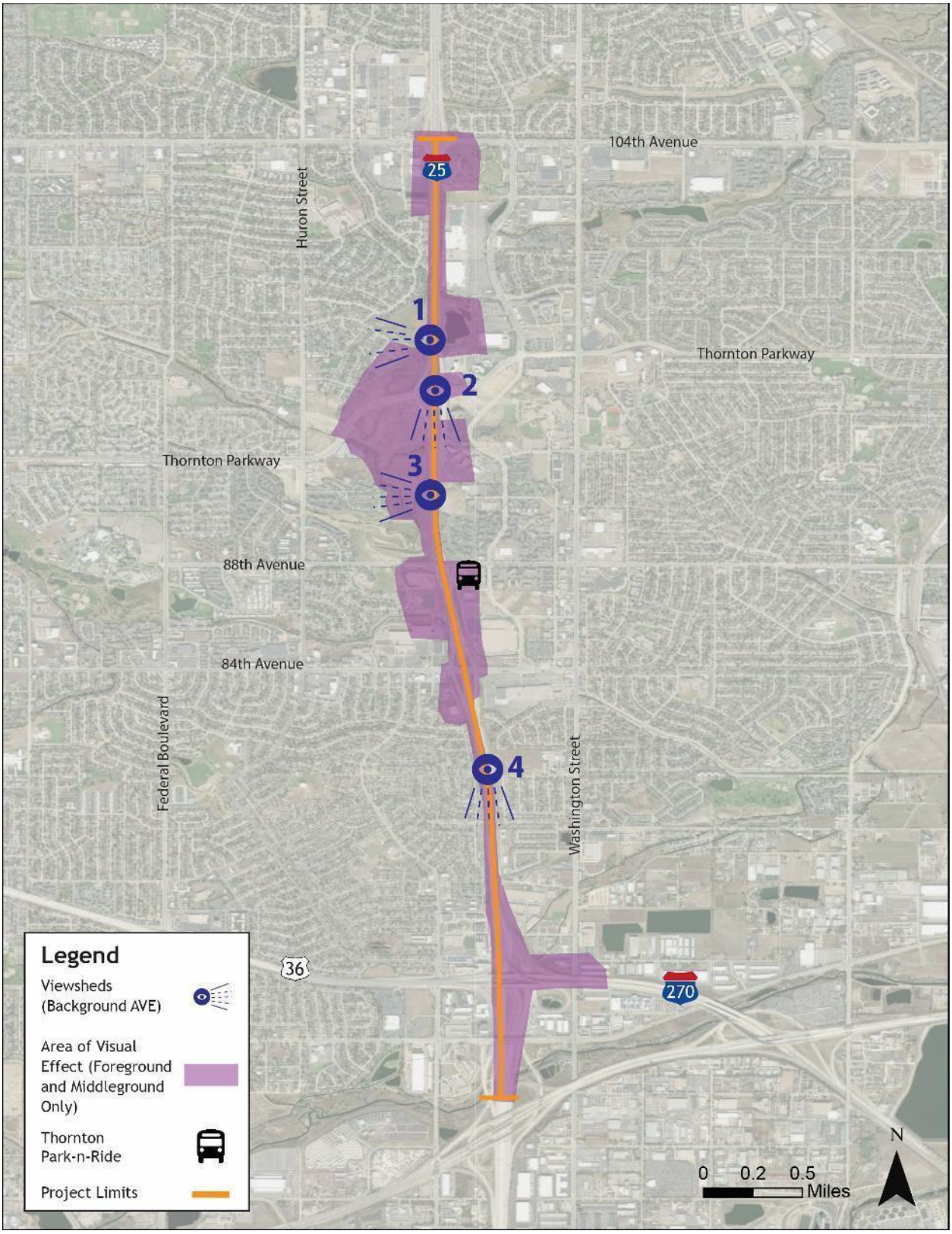


Figure 3 shows the background views from viewsheds 1-4 identified in **Figure 2.**

Figure 3. Representative Views from Viewsheds 1-4



Viewshed 1: I-25 southbound, north of Thornton Parkway with background views to the west of the Rocky Mountains.



Viewshed 2: I-25 southbound, south of Thornton Parkway with background Rocky Mountain and city views.



Viewshed 3: I-25 southbound, overlooking Niver Creek Open Space with background views to the west of the Rocky Mountains.



Viewshed 4: I-25 southbound, near 78th Avenue with background views of downtown Denver.
Source: Google Earth Pro

4.2 Context and Visual Inventory

4.2.1 Landscape Character

The project is located in a general urban to suburban corridor. The AVE is mostly an enclosed landscape because views of the highway are primarily blocked by noise walls or differences in topography. Recreational users in Civic Center Park, Niver Creek Open Space, and Niver Creek Trail have the most direct views of the highway.

Travelers on I-25 have background views of the Rocky Mountains and downtown Denver at Thornton Parkway, around 80th Avenue southbound, and Niver Creek Open Space specifically (**Figure 3**).

The landscape is scattered with trees and some shrubs but lacks consistency.

4.2.2 Viewers

Viewers in the area primarily consist of highway travelers, highway neighbors and recreational users. Highway travelers are mostly private automobiles and large commercial vehicles/trucks who are often moving quickly through the corridor. Residential and commercial users make up highway neighbors, although their views are often blocked by noise walls. Recreational users consist of Niver Creek Trail, Niver Creek Open Space, and Civic Center Park patrons. Of these users, Niver Creek Trail users have the most direct views of the highway near 88th Avenue and RTD's Thornton Park-n-Ride.

4.2.3 Visual Quality

Views are limited in the corridor by noise walls and the surrounding built environment. A few background views of the Rocky Mountains and downtown Denver can be found and are called out in the AVE. Natural vegetation is limited to Niver Creek Open Space and dispersed trees and shrubs along the highway.

5.0 Environmental Consequences

This section documents the anticipated impacts of the No Action and Proposed Action alternatives. **Figure 4** and **Figure 5** provide visual references for locations where permanent and temporary impacts are anticipated.

5.1 No Action Alternative Impacts

No noticeable visual change would occur in the AVE under the No Action Alternative. Existing visual elements would remain. As congestion continues, slow-moving traffic would occupy views both from and toward the highway. No actions would be taken to improve the area's visual image. Temporary visual intrusions would occur in the form of ongoing and periodic highway maintenance activities.

5.2 Proposed Action Alternative Impacts

5.2.1 Permanent Impacts

Permanent impacts would occur from the widening of the highway. Widening of the highway includes the addition of auxiliary lanes throughout the corridor, a climbing lane northbound (NB), and an additional general-purpose lane southbound (SB). However, given the existing width and prominence of the highway, it is unlikely that widening would have a noticeable impact on the corridor's visual character for those on the highway (**Figure 5**: Photo 1 and 3). Impacts of the highway widening on adjacent views are discussed below.

Based on the traffic noise analysis and abatement assessment for the project (CDOT 2026), one new noise barrier was determined to be both feasible and reasonable and is recommended for implementation. The new barrier would be constructed between I-25 SB and the Mapleton School complex (including the Global Leadership Academy), located east of 7480 Broadway. Photo number 2 in **Figure 5** shows the location of the Mapleton School complex from I-25 SB. The recommended height and length of the wall is 14 feet and 660 feet, respectively. By blocking highway users' views of the school complex and vegetation as well as the school's view of the highway, the new noise wall would create a permanent visual change for both.

In addition to the new noise barrier, the replacement and extension of an existing noise wall located between I-25 northbound and Park 88 Apartment community located north of 88th Avenue is also recommended. The existing barrier is made of stone and is 13 ft in height and 1,240 ft in length. Due to the addition of a lane, the existing noise barrier would be removed and replaced to accommodate widened roadway. Although most of the proposed noise barrier would be replaced within several feet of its original location, the southern end would be replaced 15 ft east (closer to the apartment complex) of its current location, and the northern end would extend an extra 75 feet north. The new barrier is recommended to have a top-of-wall elevation consistent with the current noise wall. The movement of the noise wall closer to the apartments would result in a permanent visual change for the residents. The

extension of the noise wall is unlikely to impact highway user views given that users are traveling at fast speeds.

Approximately 200 ft of an existing noise abatement wall would be replaced and moved closer to the residences at the end of the Grant Way cul de sac in the Northview Estates Subdivision to accommodate the expansion of I-25. The replacement wall would be approximately 12 ft in height and would function as both a noise barrier and a retaining wall. This replacement wall would remain within the CDOT Right-of-Way (ROW)between the wall and the residence. The wall would permanently alter the visual setting of the Grant Way cul de sac. The tall wooden fence and mature vegetation surrounding the parcels would partially obscure the view of the replacement wall from Grant Way (**Figure 5**: Photo 4). CDOT will offer saplings to the two residences adjacent to the noise wall for voluntary planting to help mitigate the wall's visual impacts.

Existing noise walls in the project limits consist of either masonry block or post-and-panel construction. The new and replacement noise walls would be constructed of post-and-panel systems to match the existing post-and-panel walls' color, texture, and materials.

Existing landscaping that is disturbed by the project will be replaced. New landscaped areas may be installed within interchanges, and these areas would be designed in coordination with the City of Thornton.

The highway's visual character would improve with the replacement of the 88th Avenue bridge, which would be designed in coordination with Thornton to be more to be visually consistent with the 84th Avenue bridge, which is a gateway to Thornton, and the 136th Avenue bridge in Northglenn (**Figure 5**: Photo 8). The bridge would rise by 3.5 feet on the west side and 5.0 feet on the east side, which would slightly alter highway users' view of residential and commercial properties in Thornton—views of downtown Denver and the Rocky Mountains would not be altered in this location due to the existing topography. The proposed 88th Avenue bridge would eliminate the existing concrete slope paving at both bridge abutments, which currently create large diagonal concrete embankments beneath the structure; removal of these elements would reduce the extent of exposed concrete and create a minor beneficial visual impact within the corridor.

No permanent visual impacts to recreational viewers using Civic Center Park would occur and no trees would be removed from this property. The conversion of Niver Creek from a box culvert to an open channel, in the vicinity of the Thornton Park-n-Ride and the Niver Creek Trail, would have beneficial visual impacts on Park-n-Ride and trail users due to the introduction of an open stream in this area. The project would have a minor visual impact to recreational users where the Niver Creek Trail is realigned. North of 88th Avenue, the trail's realignment would visually mimic the existing trail and be compatible with the landscape of the Open Space and would not substantially alter the existing trail's positioning or limited views of the highway (**Figure 5**: Photos 7, 9, 10, and 11). South of 88th Avenue, the trail's realignment adjacent to the Thornton Park-n-Ride west parking lot would shift trail users away from the highway and closer to the newly open Niver Creek stream, which would be a

beneficial impact on trail users. Overall, the area of visual effect (AVE) would retain its urban to suburban visual character.

Installation of a retaining wall and associated tree removal between I-25 and the rear (service side) of the Home Depot property would result in a permanent visual change for limited viewers from adjacent properties, including the cemetery located southeast of the 104th Avenue interchange. The retaining wall and tree removal would extend approximately the length of the Home Depot property along the highway. This area consists primarily of the commercial service side of the property, and the visual change would be consistent with the existing utilitarian character of the setting. Throughout the project, new retaining walls that are eight feet in height or greater will be designed to be more visually pleasing.

5.2.2 Temporary Impacts

I-25 travelers and surrounding residents and recreational viewers would experience temporary visual impacts from views of construction staging areas, construction vehicles, construction personnel, and temporary construction mitigation measures, such as silt fences; however, views of the highway from adjacent properties would be shielded by existing topography in many locations (**Figure 5**: Photo 12). Highway neighbors, including residential and commercial, would experience temporary visual impacts from the construction of replacement noise walls near their homes or businesses. The locations where noise walls would be installed or replaced include near and around the Mapleton School complex, the Park 88 Apartments, and the Grant Way cul de sac.

Niver Creek Trail users would experience additional visual impacts due to a change in scenery when they are detoured during construction (**Figure 5**: Photos 5 and 6). Construction would also cause temporary visual impacts for transit patrons, who would have views of the construction activities from the Thornton Park-n-Ride.

Figure 4. Map of Anticipated Impact Areas

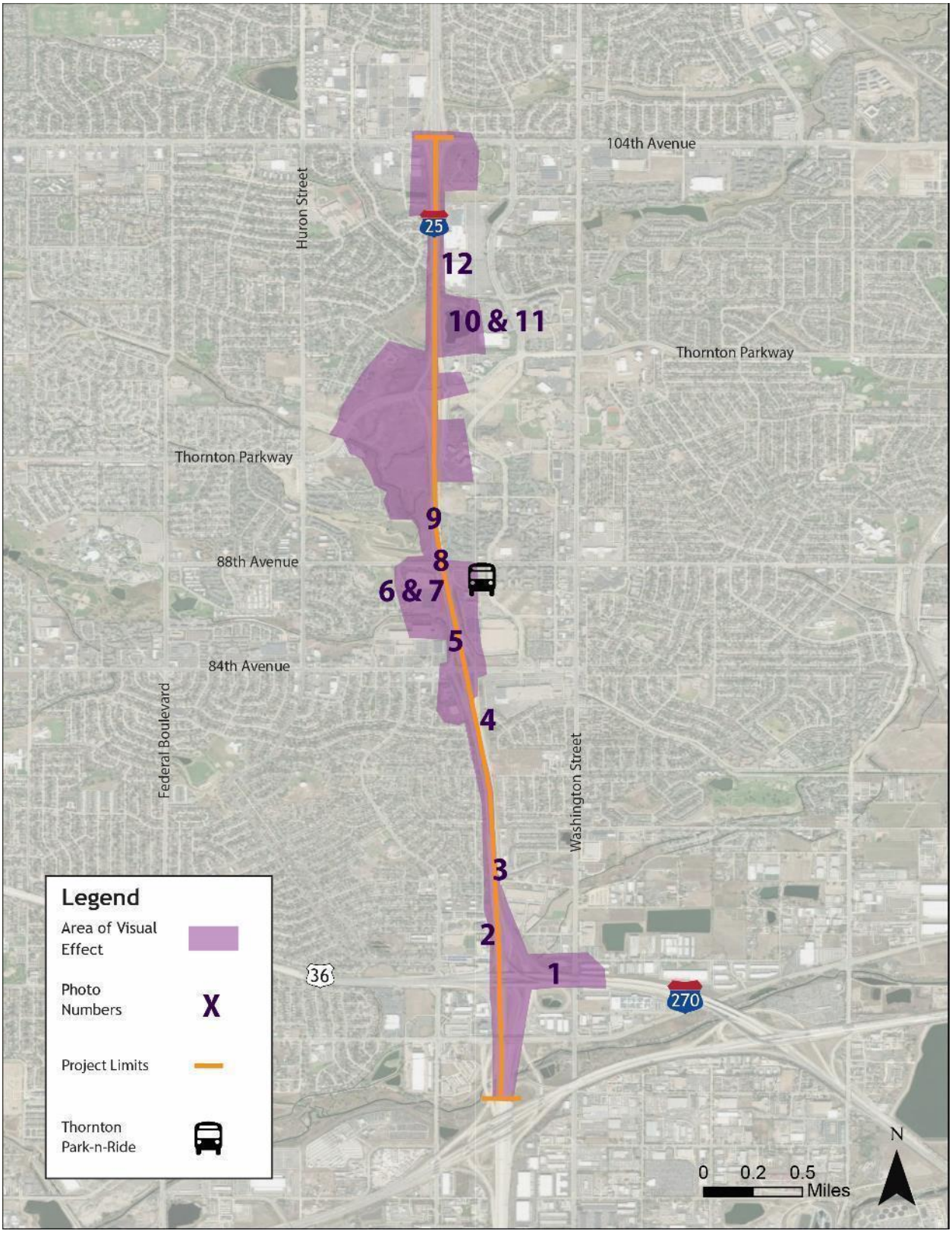


Figure 5. Views from Anticipated Impact Areas



Photo 1: Highway users from I-270 entering I-25. Adjacent highway uses include industrial and commercial which make up the majority of views for users.

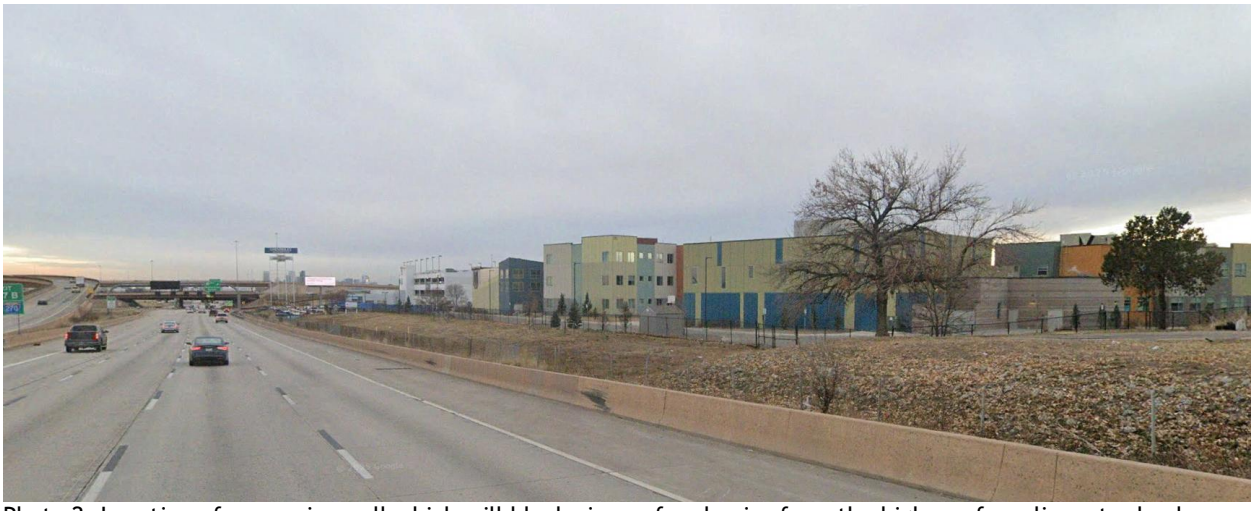


Photo 2: Location of new noise wall which will block views of and noise from the highway for adjacent school users.



Photo 3: Northbound near existing CDOT maintenance facility, with maintenance vehicle entrance to highway. Noise walls block potential views for highway users.



Photo 4: View of the highway from Grant Way. Anticipated expansion of the highway would move the existing noise wall closer to residences. This would create a permanent visual impact for residents.



Photo 5: Northbound near existing Thornton Park-n-Ride. Highway expansion in this section will increase the grade of adjacent green spaces, reduce the number of trees, and reduce the amount of available green space.



Photo 6: Existing underpass for transit patrons and recreational users. During construction, this underpass would be closed temporarily, and users would be detoured via 88th Avenue to reconnect with the trail system east of I-25.



Photo 7: The Niver Creek Trail near the existing Thornton Park-n-Ride. Recreational users would experience temporary impacts due to reconstruction of the 88th Avenue Bridge and roadway widening and permanent, beneficial impacts due to realignment of Niver Creek and its conversion from an existing box culvert to an open channel. During the creek realignment, trail users would be temporarily detoured approximately 1.26 miles via 88th Avenue.



Photo 8: 88th Avenue bridge existing conditions. The new bridge would match the aesthetic design of the existing 84th Avenue and 136th Avenue bridges including columns, girders, monuments, pedestrian railing, and pendant lighting and eliminate the concrete slope paving at both bridge abutments. This new aesthetic and design features, which were coordinated with Thornton, would be visual improvements.

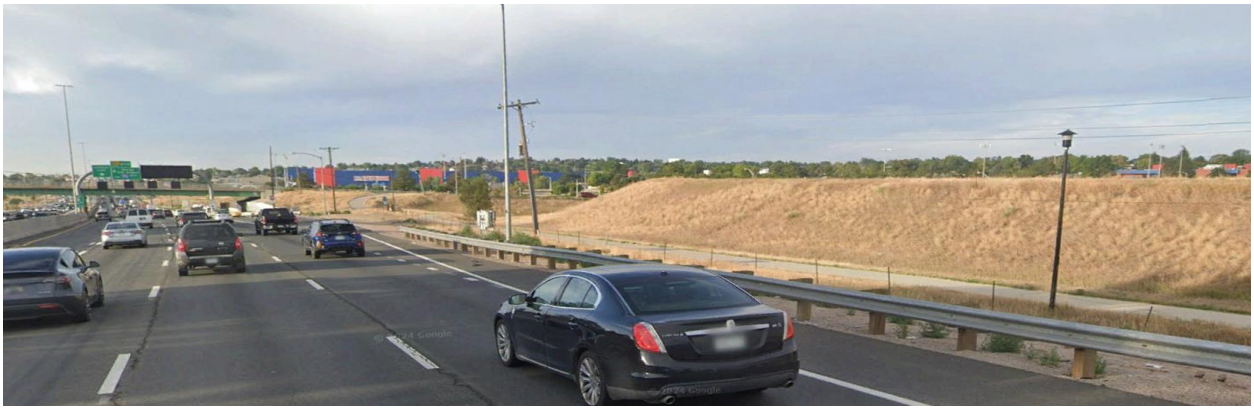


Photo 9: Southbound view of Niver Creek Dam and Niver Creek trail's current alignment along the highway, which blocks views of the open space for highway users.



Photo 10: Potential view of the highway near Civic Center Park. The highway can be seen in the foreground; however, it is unlikely that the expansion of the highway would be noticeable for viewers.



Photo 11: Like Photo 10, a different perspective of the highway near Civic Center Park can be seen in the foreground. Similarly, it is unlikely that the expansion of the highway would be noticeable for viewers.



Photo 12: View of the highway from retail location on the east side of I-25 near 104th Avenue where the topography primarily covers the road. Minor permanent impact from installation of retaining wall and removal of trees spanning length of Home Depot.
Source: Google Earth Pro

6.0 Mitigation

Throughout this project, interdisciplinary coordination has occurred as the potential for adverse visual impacts has been considered. In accordance with CDOT's Guidelines, the team has considered options to avoid, minimize, and/or compensate for visual impacts (**Table 1**).

Table 1. Mitigation Commitments

Activity Causing Impact	Location of Activity	Impact	Mitigation Commitment	Responsible Branch	Timing/Phase of Mitigation Implementation
Construction-related activities	Throughout the construction limits	Temporary visual impacts would result from views of staging areas, construction vehicles, construction personnel, and temporary construction mitigation measures, such as silt fences.	Restore staging areas and construction mitigation such as silt fences per CDOT Design Specification 106.08, Storage of Materials: "All storage sites shall be restored to their original condition at the Contractor's expense" (CDOT 2019a) and Section 208.4(f), Control Measures for Stormwater: "If [temporary control measures are] removed, the area in which these control measures were constructed shall be returned to a condition similar to that which existed prior to its disturbance" (CDOT 2019b).	CDOT Engineer, Design and Construction PMs	Post-construction
Construction-related activities	Existing landscaped areas and interchanges	Temporary visual impacts would result from the disturbance of existing landscaped areas through construction-related activities.	Existing landscaping that is disturbed by construction-related activities will be replaced. Slopes are designed to be 3:1 (Maximum) (horizontal:vertical) or flatter where feasible to support maintenance access and vegetation establishment. Where steeper slopes are required due to site constraints, design measures such as slope rounding, warping, or retaining walls are incorporated to reduce visual contrasts and maintain landscape compatibility.	CDOT Engineer, Design and Construction PMs	Post-construction

Activity Causing Impact	Location of Activity	Impact	Mitigation Commitment	Responsible Branch	Timing/Phase of Mitigation Implementation
Installation of noise barrier	Between I-25 SB and the Mapleton School complex	Permanent visual change for highway viewers and users; viewers from the Mapleton School complex would likely no longer have highway views.	The design of the new noise wall will be aesthetically consistent with the existing adjacent masonry wall to include a beige color with a split face block and dark brown continuous accent block near the top of the wall.	CDOT Engineering and Landscape Architect, and Contractor	Final Design and Construction
Replacement and extension of noise barrier	Between I-25 NB and Park 88 Apartments	Permanent visual change for highway viewers and users; viewers from Park 88 Apartments would likely notice the wall 15 feet closer on the south side of the complex, while highway users would likely not notice the 75-foot extension of the noise wall to the north as they are travelling at a high speeds.	The design of the replacement and extended noise walls will be consistent with the existing post-and-panel noise wall construction used throughout the corridor and include a beige color with a split face block and intermittent dark brown mountain pattern panels. The Contractor shall notify neighbors as soon as possible about timing of construction.	CDOT Engineering and Contractor	Final Design and Construction
Replacement of noise barrier	Between I-25 NB and 194 Grant Way	Temporary visual impact to residents are likely during reconstruction of noise barrier in this location; they are likely to experience views of construction during this time.	The Contractor shall notify neighbors as soon as possible about timing of construction.	CDOT Engineer, Design and Construction PMs	During construction
Replacement of noise barrier closer to residences	Between I-25 NB and 194 Grant Way	Permanent visual change for Grant Way residents.	The Contractor will coordinate with the residents at 180 and 194 Grant Way and offer each residence up to three saplings, furnished by The Contractor, for voluntary planting by the property owners to help mitigate visual impacts associated with the replaced noise wall (with planting and care instructions).	CDOT Engineer, Design and Construction PMs	During construction

Activity Causing Impact	Location of Activity	Impact	Mitigation Commitment	Responsible Branch	Timing/Phase of Mitigation Implementation
Removal of trees, shrubs, and grasses	Construction limits	Permanent visual change with plant removal necessary for highway expansion.	Replace trees with trees that are both low water and adapted to soils on Thorton or Adams County's approved tree list and include a plan for 3 year maintenance. Include tree placement and species in final design and require Contractor to develop a maintenance plan for local agencies to maintain. If trees removed cannot be replaced within CDOT right-of-way, then CDOT will furnish the same number of trees to the City of Thornton Parks and Recreation Department for use within their parks system.	CDOT Engineer, Design and Construction PMs, Landscape Architect	Final design and Construction
Installation of new retaining walls eight feet in height or taller	Construction limits near parks, open space, and residences	Retaining walls eight feet or higher are visually dominant within the landscape.	Retaining walls eight feet in height or higher will feature a beige split face block style. The selected treatments shall be documented in the final plan set and are subject to CDOT approval prior to construction.	CDOT Engineer, Design PM	Final design

7.0 Required Permits and Clearance Needs

A CDOT landscape architect will review designs for planting, grading, and noise walls during final design. No permits are required for visual resources.

8.0 References

Colorado Department of Transportation (CDOT). 2019a. **2019 Standard Specifications Book. Division 100 General Provisions.** https://www.codot.gov/business/designsupport/cdot-construction-specifications/2019-construction-specifications/2019-specs-book/2019-division-100.

Colorado Department of Transportation (CDOT). 2019b. **2019 Standard Specifications Book. Construction Details Division 200 Earthwork**. https://www.codot.gov/business/designsupport/cdot-construction-specifications/2019-construction-specifications/2019-specs-book/2019-division-200.

Colorado Department of Transportation (CDOT). 2020. **2019 CDOT Visual Impact Assessment Guidelines: Version 2 – Revised September 25, 2020**. September 25.

Colorado Department of Transportation (CDOT). 2026. **I-25 US 36 – 104th Avenue: Noise Technical Report.**

Attachment A.

Project Information

Attachment A: Project Information

October 23, 2026 - Version 15

Subaccount number: 25563

BACKGROUND

The Colorado Department of Transportation (CDOT) and the Federal Highway Administration (FHWA) are proposing transportation improvements to Interstate 25 (I-25) between United States Highway 36 (US 36)/I-270/I-76 interchange and 104th Avenue.

Project History

CDOT has previously completed an Environmental Impact Statement (EIS), a Planning and Environmental Linkages (PEL) study, a safety audit, previous National Environmental Policy Act (NEPA)-level planning, and supplemental operational and transit and safety analyses that recommended improvements to this segment of I-25.

Some of the previously recommended improvements have been constructed, like the Express Lanes approved in the **North I-25 Record of Decision 1** (ROD1) (FHWA and CDOT, 2011), while others have not yet been implemented. The current Project evaluates proposed transportation improvements that reflect and build upon previous recommendations.

Because the current Project includes elements that were not evaluated and approved in the **North I-25 ROD1**, this Project is undergoing new evaluation under the National Environmental Policy Act.

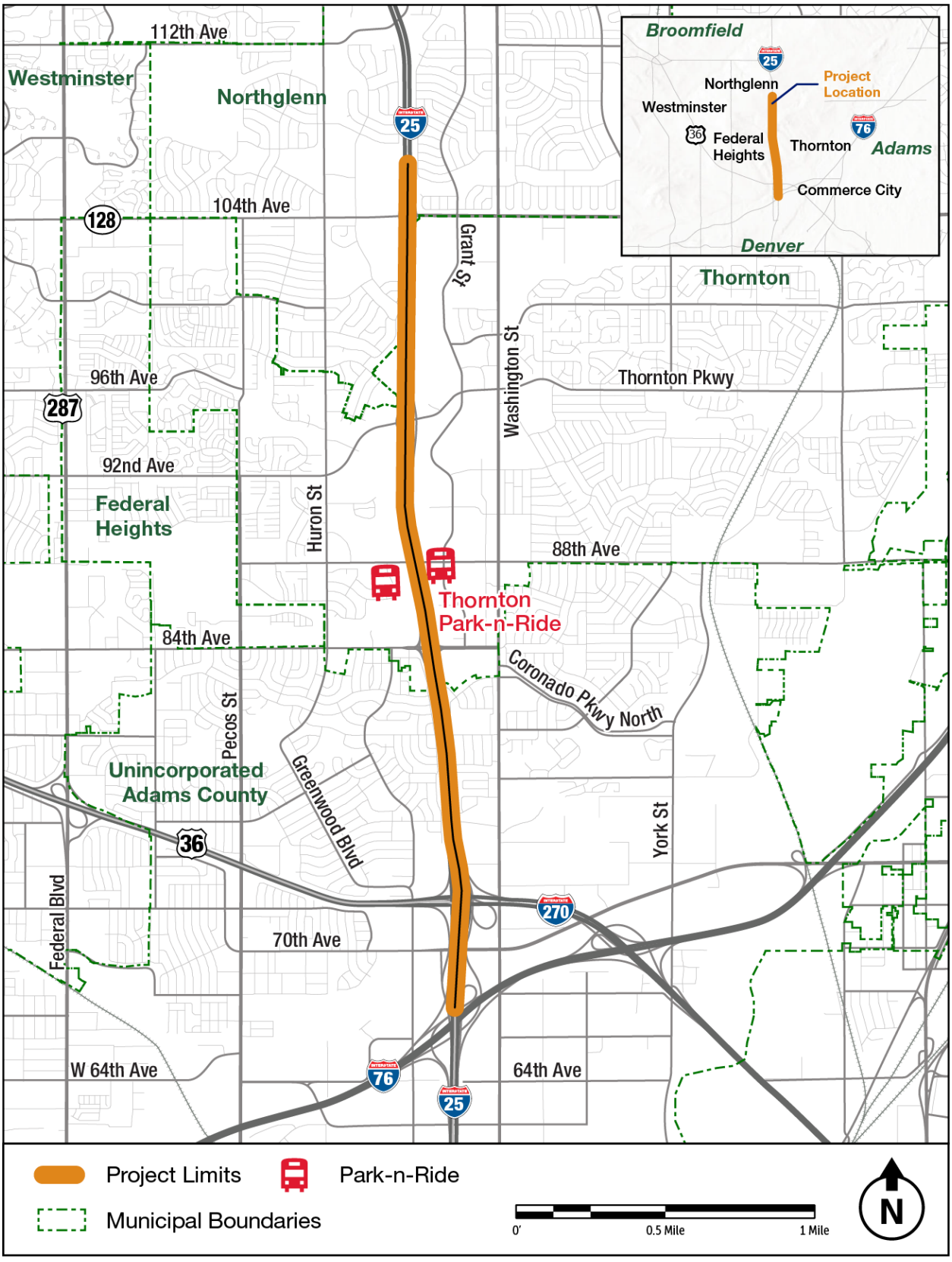
Study Area

The Project limits, illustrated in **Figure 1**, extend along I-25 from the US 36/I-76/I-270 interchange to 104th Avenue. It includes portions of US 36 and I-270, major arterials crossing I-25, and areas of potential drainage improvements. The study area for the Project varies by resource. Each resource's study area is defined within its corresponding technical report or memorandum.

The interchanges included in the Project limits are:

- I-25/US 36/270/I-76
- I-25/84th Avenue
- I-25/88th Transit Slip Ramps
- I-25/Thornton Parkway
- I-25/104th Avenue

Figure 1. Project Limits



PURPOSE AND NEED

The purpose of the Project is to improve I-25 between US 36 and 104th Avenue to address safety concerns and traffic operations.

The Project is needed to:

- Improve safety
- Improve traffic operations

In addition to addressing Project needs, the Project also has the following goal:

- Minimize environmental and community impacts caused by the Project

PROPOSED ACTION

The Project would improve approximately five miles of I-25 between US 36 and 104th Avenue. All lanes are 12 feet in width unless otherwise noted. The current cross-section of this segment of I-25 includes:

- Three general-purpose travel lanes in each direction
- One Express Lane in each direction, along the inside shoulder, separated from the adjacent general-purpose lane by a 2-foot buffer
- A southbound auxiliary lane between the 84th Avenue and US 36 interchanges
- A southbound auxiliary lane between the 88th Avenue transit slip ramp and the 84th Avenue interchange
- A northbound auxiliary lane between the 88th Avenue transit slip ramp and Thornton Parkway interchange
- Inside shoulders varying in width between 2 and 12 feet and outside shoulders varying in width between 6 and 12 feet

The Proposed Action on I-25 between US 36 and 104th Avenue, illustrated in **Figure 2**, includes the general-purpose and Express Lanes listed above and adds the following elements to the existing cross-section:

- A new 12-foot wide southbound general-purpose lane from 104th Avenue to south of 84th Avenue (all new lanes will be 12 feet in width)
- A new northbound climbing lane from the I-76 entrance ramp to 104th Avenue
- An expanded buffer of 4 feet between the Express Lane and the adjacent general-purpose lane
- A new continuous auxiliary lane southbound between the 84th Avenue and Thornton Parkway interchanges
- New continuous northbound auxiliary lanes between the interchanges at I-270 and 84th Avenue, 84th Avenue and Thornton Parkway, and Thornton Parkway and 104th Avenue
- Expanded inside and outside shoulders with typical 10-foot widths, and minimum 6.5-foot inside and 7-foot width in restricted locations

In addition to those changes to the cross-section, the Proposed Action would include the following elements:

- Realignment of the combined I-76 and US 36 on-ramp connection
- Expansion of the I-270 exit to northbound I-25 from one to two lanes; I-270 merge with I-25 shifted farther north (See **Figure 3**)
- Removal of bus-only slip ramps along I-25 at the Thornton Park-n-Ride facilities
- Changes to the Park-n-Ride west parking lot including reduction in size and reconstruction of circulation widths, sidewalks, and median areas to accommodate the proposed open channel of Niver Creek
- Changes to the Park-n-Ride east parking lot including reconstruction of bus bays and relocated shelters and amenities
- Replacement of the 88th Avenue bridge over I-25; wider to accommodate improved bicycle and pedestrian facilities and longer to accommodate I-25 widening

- Realignment of the I-25 adjacent existing trail and pedestrian network within the Niver Creek Open Space and its connections to the Thornton Park-n-Ride facilities (see **Figure 4**)
- Replacement of the aging pedestrian and bikeway underpass at the Thornton Park-n-Ride facility
- Removal of Niver Creek from the existing box culvert at the Thornton Park-n-Ride and conversion of the creek into an open channel
- Relocation of the segment of Niver Creek east of I-25, which currently flows south from the Park-n-Ride east parking lot to the creek's intersection with Tributary L, to the west side of I-25
- New water quality treatment features throughout the project area

Figure 2. Proposed Action

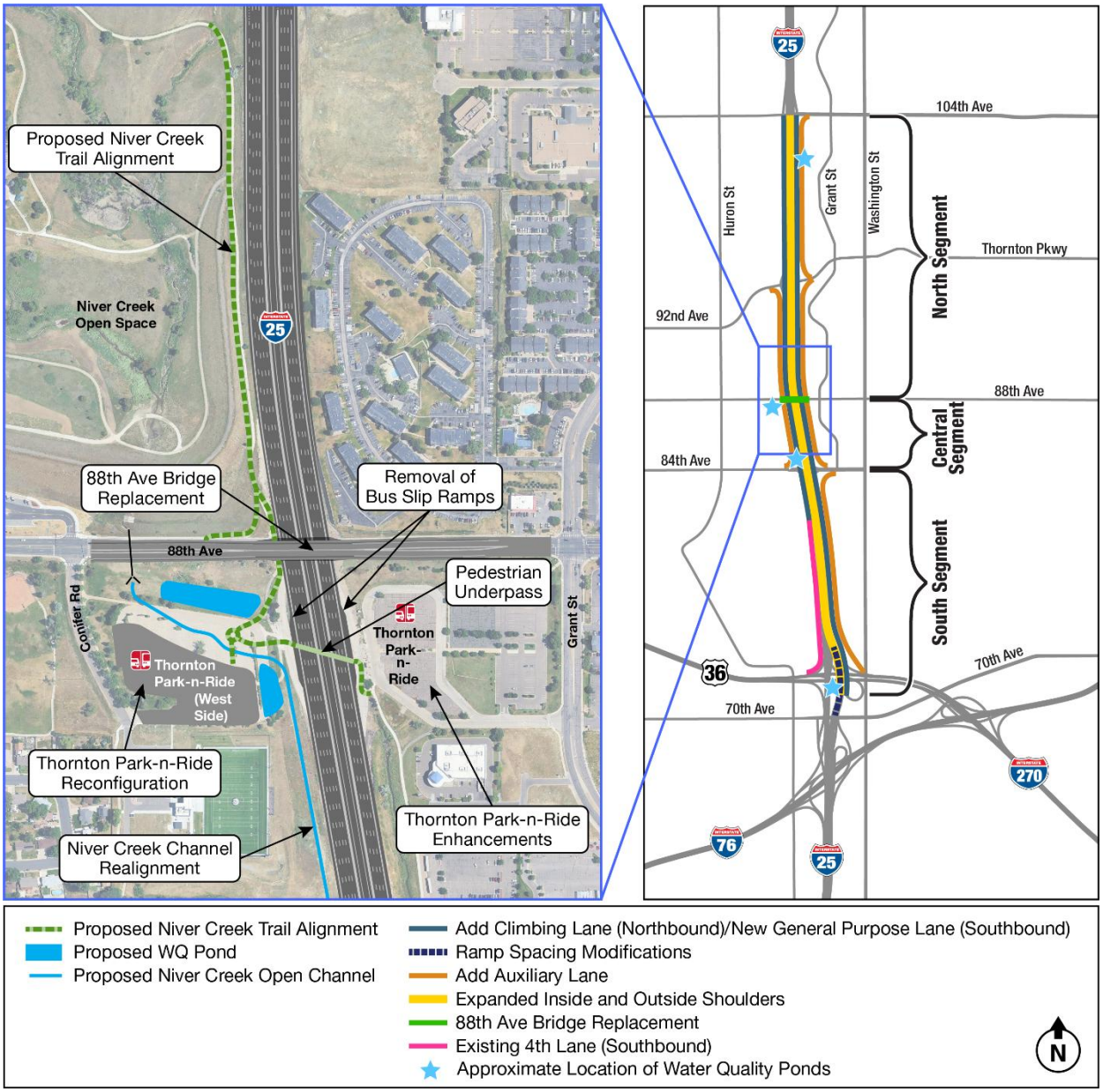


Figure 3. Proposed Improvements to I-270 Exit to NB I-25

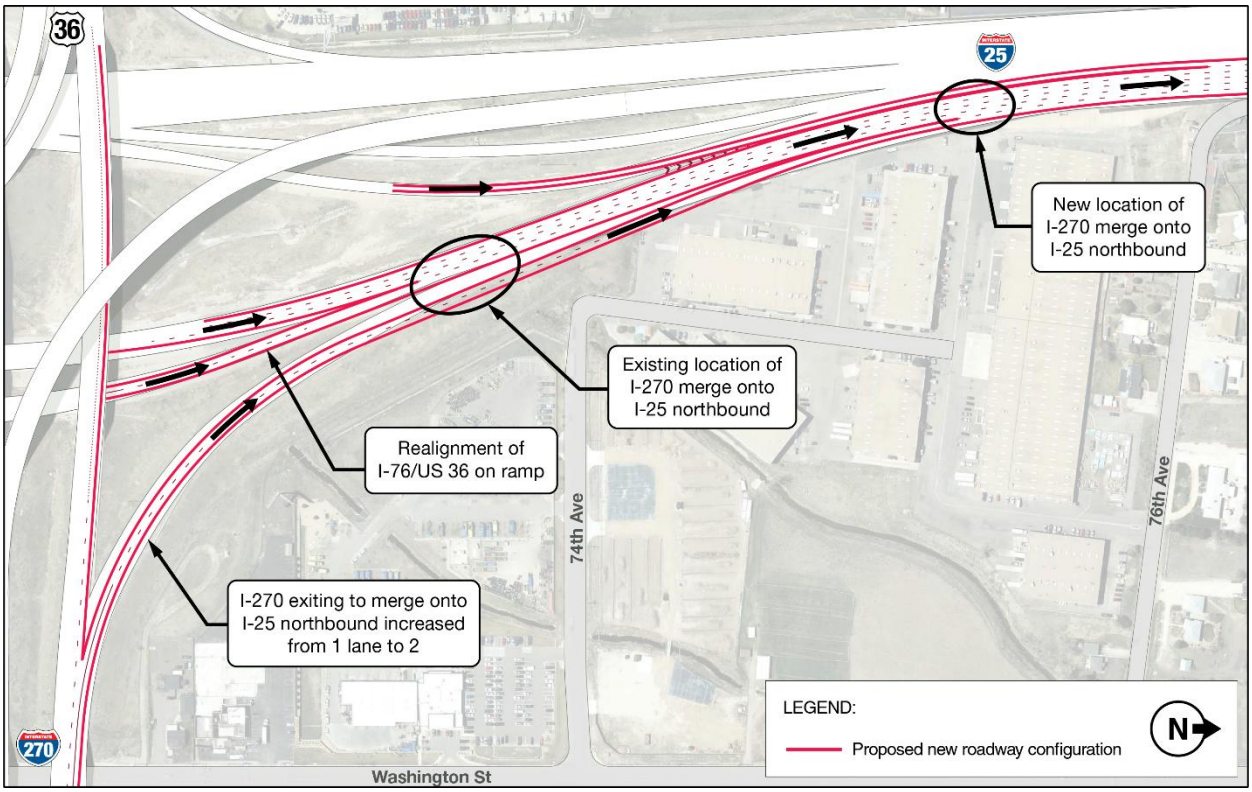
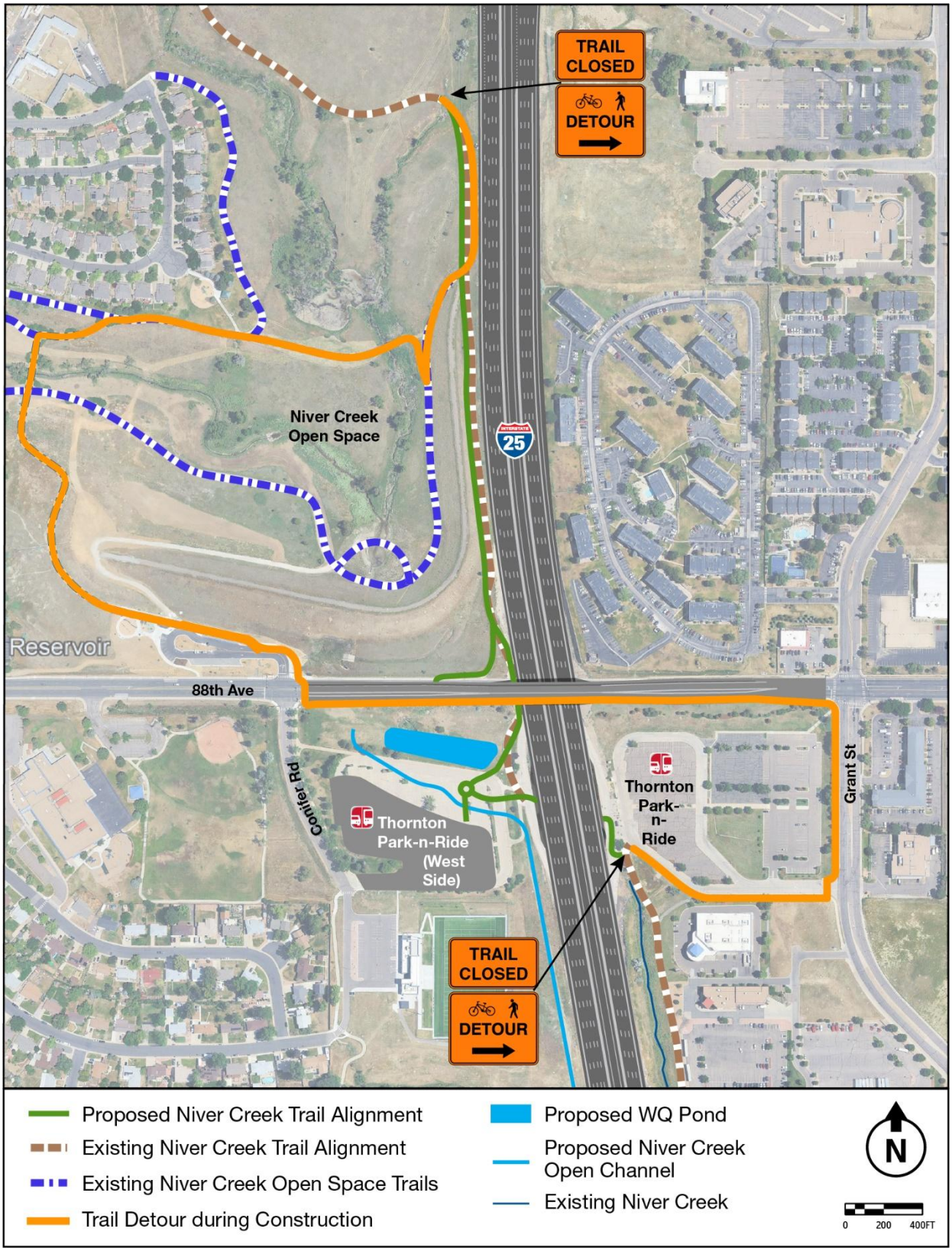


Figure 4. Proposed Realignment of Niver Creek Trail



Attachment B.

Visual Resources Scoping Documentation

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Visual Resource Scoping Documentation

Version 2 – Revised September 25, 2020

Visual resource scoping is conducted early in the visual impact assessment (VIA) process to identify issues, determine if a VIA is necessary, and identify the appropriate level of VIA evaluation.

Preparers should complete the following tables and questionnaire to document scoping findings regarding:

- **Project Information and Visual Attributes**
- **Visual Context**
- **Policies, Guidelines, and Feedback**
- **Decision Tree: VIA Requirements/Level of Documentation**
- **VIA Scoping Questionnaire**
- **Issues and VIA requirements (Not Required, Memorandum, or Standard)**

This step-by-step approach should be conducted in coordination with the CDOT environmental team and visual resource specialist assigned to the project. **Chapter 2** of CDOT's VIA Guidelines (available on CDOT's LA website) includes further information about the Establishment/Scoping Phase.

Completion of the visual resource scoping steps and documentation may be accomplished through desktop research and reconnaissance, collaboration with CDOT, and/or field observations.

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Project Information and Visual Attributes

Information	Attributes
Project Name:	I-25 US 36 to 104th Avenue Safety and Operations Improvements
Project Location:	Adams County, CO
Author:	Melissa Martin, Peak Consulting Group
Visual Attributes of Proposed Action:	The proposed action under consideration includes the following changes to I-25 and surrounding transportation infrastructure between US 36/I-76/I-270 interchange and 104th Avenue: A new southbound general-purpose lane from south of 84th Avenue to 104th Avenue A new northbound climbing lane from the I-76 entrance ramp to 104th Avenue Increased buffer width between the existing Express Lanes and adjacent general-purpose lanes from two to four feet New continuous auxiliary lanes in both directions between the 84th Avenue and Thornton Parkway interchanges A new continuous northbound auxiliary lane between I-270 and 84th Avenue Expansion of inside and outside shoulders to a typical 10-foot width, and a minimum 7-foot width in restricted locations Realignment of the combined I-76 and US 36 on-ramp connections and auxiliary lane connection to northbound I-25 Expansion of the I-270 exit to northbound I-25 from one to two lanes; I-270 merge with I-25 shifted further north Removal of the bus-only slip ramps along I-25 at the Thornton Park-n-Ride facilities Replacement of the 88th Avenue bridge over I-25; wider to accommodate improved bicycle and pedestrian facilities and longer to accommodate I-25 widening Realignment of the I-25 adjacent existing trail and pedestrian network within the Niver Creek open space and its connections to the Thornton Park-n-Ride facilities Replacement of the aging pedestrian and bikeway underpass at the Thornton Park-n-Ride facilities A new noise wall along southbound I-25 near noise sensitive properties identified through noise analysis in the Noise Report Replacement and relocation of existing noise walls closer to residential properties near Park 88 Apartments and 194 Grant Way. The features of the proposed action with the greatest potential to attract viewer attention include the addition, replacement, and relocation of noise walls and the replacement of the 88th Avenue bridge. Proposed landscape improvements and architectural aesthetics are currently unknown and will be addressed during the design phase.

Visual Context

Context	Description
Landscape Observations:	The project is within an area described in CDOT's Guidelines as Front Range Urban. The topography varies throughout the corridor as the grade along the highway changes up to 4%. The grades of the surrounding landscape vary but are generally 3:1 or gentler. High points along the corridor include 80th Avenue and Thornton Parkway. Front Range mountains are visible in the distance to the west and south. Overall, the landscape character of the corridor is urban and infrastructure-oriented. I-25 forms a dominant horizontal axis through the corridor, defined by wide paved travel lanes, vertical noise walls, concrete barriers, overhead sign structures, and interchange ramp geometry. These engineered elements create strong linear patterns and repetitive structural forms that organize the visual environment. The landscape character reflects predominantly commercial and residential uses, although the noise walls generally block views of residential neighborhoods from the highway, resulting in a corridor viewshed that is largely confined to the immediate roadway corridor, with limited visibility of residential and commercial areas.
Landscape Observations:	From residential viewpoints, the highway is typically perceived as a screened corridor edge. Masonry and post-and-panel noise walls, combined with grade changes and intervening development, limit direct views of pavement and traffic. Where visible above the noise walls, highway elements appear as moving vehicle forms, overhead signage, and light standards that rise above the wall line. Where the interstate is visible, outside of noise walls, the interstate presents as a dominant horizontal linear feature characterized by broad expanses of gray pavement, vertical noise walls, overhead sign structures, and regularly spaced light poles. Its engineered form, consistent materials, and large-scale contrast with smaller-scale residential and commercial buildings but are visually consistent with the surrounding urban transportation infrastructure. Buildings are typically one to three stories, depending on use, and differing colors, materials, and architectural styles.
Landscape Observations:	From commercial viewpoints, the landscape character is dominated by urban development and infrastructure, including large building footprints, parking areas, signage, lighting, and roadway access features. Views toward I-25 from commercial areas are generally open. The highway's broad pavement surfaces, signage, and lighting are similar in scale and intensity to adjacent commercial buildings, large parking areas, and signage, resulting in comparable visual massing and structural character. Several associated transportation features are prevalent, such as large green overhead directional signs, guardrails, light fixtures, on- and off-ramps, overpasses, and jersey barriers. Traffic is often congested, creating views of tightly spaced commercial trucks, buses and commuter vehicles. Deciduous and coniferous trees of varying sizes, grasses and shrubs planted in a naturalistic design occupy the right-of-way (ROW) to the west and east of I-25. A more formal planting design is used at the 84th Avenue interchange.

Context	Description
Landscape Observations:	The eight-lane highway establishes a strong visual presence through its width, continuous pavement surface, repetitive vertical elements (light poles and signs), and the height and length of noise walls. Interchanges at US 36, I-270, and I-76 introduce sweeping ramp forms and layered concrete structures that reinforce the corridor's engineered character. Starting from south to north, the I-25 interchanges with US 36, I-270, and I-76 are predominant linear forms. Once on I-25, the gray pavement, and a mixture of residential, industrial, and commercial development comes into view. Single-family homes protrude over the noise walls. The noise walls line each side in this section of the corridor and are made of masonry or post-and-panel construction, colored in earth tones. The noise walls to the east and west have differing patterns but generally follow the same aesthetic. Occasional uncultivated grassy patches and light fixtures line the right-of-way continuing north to 84th Avenue.
Landscape Observations:	Views begin to open at 84th Avenue as the roadway grade decreases and the noise walls end temporarily. The 84th Avenue bridge's earth tones create a natural aesthetic as highway users enter Thornton city limits, generating visual cohesion with the sound walls to the south. This gateway into Thornton is accompanied by landscaped shrub beds and stone design features. Landscaped beds with trees and bushes line the exits that go through Thornton and the number of trees along the highway after 84th Avenue increases. American Furniture Warehouse and other large retail spaces become visible, as well as parking lots and large billboards. A more natural landscape returns closer to the 88th Avenue Bridge where the Niver Creek Trail/Open Space and Thornton Park-n-Ride intersect. The 88th Avenue Bridge is significantly different from other bridges and linear forms along the corridor, as it has no distinctive features and has green, rusty metal siding rather than a aesthetic like other bridges in the corridor.
Landscape Observations:	A noise wall and the Niver Creek Open Space dam act as barrier between residential neighborhoods and I-25 on the north side of 88th Avenue. More trees and native grass patches line the right-of-way in this section of the highway. The noise wall ends right before Thornton Parkway, where the views open once more, and the Front Range can be seen to the west and hospital/office buildings to the east. At Thornton Parkway, the grade increases (and reaches its peak within the corridor) and when traveling southbound there are unobstructed views of downtown Denver and the Front Range.
Landscape Observations:	The north side of Thornton Parkway is lined with dense trees to the west that make up Badding Reservoir, although the reservoir cannot be seen from the highway. Thornton's Civic Center and Civic Center Park can be viewed to the east from I-25 just north of Thornton Parkway. A noise wall runs on the west side of the highway in this section. The right-of-way from Thornton Parkway to 104th Avenue hosts the densest number of trees in the corridor which demonstrate a random planting pattern. More big-box stores, like Home Depot and Sam's Club, can be seen on the east side of I-25 in this section. At the northernmost part of the corridor (104th Avenue), a general pattern of commercial shopping centers can be seen, as well as the Olinger Highland Cemetery. Views of the cemetery are obstructed by a difference in grade from the highway, but assorted clumps of trees and turf grass are visible.
Influence of Roadway on Natural and Cultural Environment Settings:	Given the urban nature of the corridor, the project fits within the context of its environment. The roadway flows through the corridor, only contrasted by Niver Open Space near 88th Avenue. However, given the extensively developed surroundings, I-25 does not additionally contrast with natural surface relief and does not impact the corridor's cultural environmental setting.

Context	Description
Landscape Context(s) and Development Patterns:	☐ Natural/ Undeveloped ☐ Rural ☐ Suburban ☒ Urban The project is located within a general urban to suburban corridor. The highway functions as a major north/south route between downtown Denver and the communities of the northern Denver metropolitan area. Land use in the project area primarily consists of commercial and residential uses with a few areas of open space, landscaped parks, civic services and hospitals. Local plans, **Thornton Tomorrow Together** (2020) and **Advancing Adams County** (2022), support increased density through additional housing and mixed-use development. This project would help to accommodate these new development patterns.

Policies, Guidelines, and Feedback

Policies	Description
Needs for Federal, State, or Local Agency Consultation:	The project is not adjacent to any U.S. Forest Service, National Park Service, or Bureau of Land Management lands, or other visually sensitive areas that would require agency consultation during development of the VIA.
Involvement with Federal Lands MOU:	The project is not adjacent to, and would not affect, any federal lands.
Involvement with Scenic, Historic District, or Historic Byways:	I-25, US 36, I-270 and I-76 and the roads adjacent to the project are not designated as Scenic or Historic Byways and do not travel through a Historic District.
Associated Regulations, Policies, or Guidelines:	**Advancing Adams County Comprehensive Plan** (2022): Strategy BEC 1.1.07: Evaluate opportunities to enhance visual aesthetics and reduce visual impacts at key community gateways
Influence of Agency & Public Feedback:	CDOT held a stakeholder meeting on June 27, 2024, and public meetings on July 24, 2024, and October 22, 2025 but there were no explicit mentions of Visual Resources.
Additional Details:	N/A

VIA Scoping Questionnaire

Environmental Compatibility

1. Will the project result in a noticeable visual change in the physical characteristics of the existing or future project setting? **(Consider all project components and construction impacts—both permanent and temporary, including landform changes, structures, noise barriers, vegetation removal, railing, signage, and construction activities**.) Will the project components visually enhance the existing or future project setting?

☐ High level of permanent change (3)	☐ Low level of permanent or temporary change (1)
☒ Moderate level of permanent change (2)	☐ No noticeable change (0)
☒ Potential for visual enhancement	☐ Visually enhancing change to project setting

Assumptions/issues: The overall width of I-25 will vary between three geographic sections: the south section with the northbound auxiliary lane from I-25/US 36/I-76/I-270 interchange to 84th Avenue (231 feet), the central section with the transit station between 84th Avenue and 88th Avenue (271 feet), and the north section from 88th Avenue to 104th Avenue (194 feet). Widening includes adding a southbound general-purpose lane from 84th Avenue to 104th Avenue, a northbound climbing lane from the I-76 entrance ramp to 104th Avenue, expanded buffer between the Express Lanes and general-purpose lanes, new continuous auxiliary lanes between 84th Avenue and Thornton Parkway, a northbound auxiliary lane between I-270 and 84th Avenue, and wider inside and outside shoulders. In addition, the 88th Avenue bridge will be replaced.

Existing noise walls are not expected to change in height or location with two exceptions. The first exception is the replacement and extension of an existing noise wall between northbound I-25 and the Park 88 Apartment community north of 88th Avenue: the replacement noise wall will be in line with the new retaining wall, extended approximately 75 feet north to accommodate the widened roadway and maintain the same level of noise mitigation. The top-of-wall elevation will match the current noise wall elevation. The second exception is the replacement of an existing noise wall near the residence at 194 Grant Way, which will be reconstructed closer to the residence and function as both a noise barrier and retaining wall with the same dimensions. A new noise wall will be constructed between southbound I-25 and the Mapleton School complex east of Broadway 660 linear feet in length and 14 feet in height, and will create a permanent change, but, with aesthetics similar to the rest of the corridor, should not be disruptive to viewers. The visibility of these changes from adjacent viewers will be variable, with new infrastructure dominant in the south and central sections, but less so in the north section. Therefore, a moderate level of permanent change was selected.

2. Will the project complement or contrast with the community visual character? **(Evaluate the scale and extent of project features compared to the surrounding scale of the community. Is the project likely to give an urban appearance to an existing rural or suburban community? Do you anticipate that the public will view the change as positive or negative? Research planning documents or talk with local planner/community representatives to understand the type of visual character local residents envision for their community.)** Will the project components visually enhance the existing **or future project setting?**

☐ Low compatibility (3)	☐ High compatibility (1)
☒ Moderate compatibility (2)	☐ No visual change or visual contrast (0)
☒ Potential for visual enhancement	☐ Visually enhancing to community character

Assumptions/issues: The project will complement the community visual character of the built environment that surrounds it. The project's scale and extent are consistent with present suburban commercial and residential density, with no change to the overall landscape character.

The public will likely notice minimal changes to the visual character of the existing I-25 corridor, with the replacement of the 88th Avenue bridge, additional southbound general-purpose lane and additional highway widening elements. The replacement of the 88th Avenue bridge creates potential for visual enhancement, since its new aesthetics will be complementary to other infrastructure in the Project area. The new bridge is also consistent with the city of Thornton's 88th Avenue Corridor Study. The bridge's aesthetic design will be determined during final design and through coordination with Thornton.

3. What level of local concern is there for the types of proposed project features (e.g., bridge structures, large excavations, noise barriers, or median planting removal) and construction footprint? **(Certain project improvements can be of special interest to local citizens, causing a heightened level of public concern and requiring a more focused visual analysis.)** Will the project components visually enhance the existing or future project setting?

- ☐ High concern (3)
- ☒ Moderate concern (2)
- ☒ Potential for visual enhancement
- ☐ Low concern (1)
- ☐ Negligible project features (0)
- ☐ Visually enhancing project features

Assumptions/issues: The 88th Avenue bridge replacement will improve its visual compatibility with the corridor's setting through corridor consistency improvements. ROW widening may result in impacts on roadside landscaping, noise walls and open space vegetation. Highway adjacent residents could have special interest in the ROW widening and its impact on their properties. However, the public has generally been supportive of the project thus far.

4. Would design changes that could minimize impacts or provide visual enhancement (e.g., landscaping, architectural treatment, color choices) require:

- ☐ Extensive changes or redesign (3)
- ☐ Some redesign or minimization measures (2)
- ☒ Few, minimal design options (1)
- ☐ No minimization or enhancement opportunities likely (0)

Assumptions/issues: Impacts on roadside landscape materials and open space areas within the project footprint would require landscape architecture and urban design treatments to establish visual compatibility. Realignment of the I-25 adjacent existing trail and pedestrian network within the Niver Creek open space could require redesign for further visual compatibility. The project team is working with the visual resource team to include visual coherence into the design. The project will examine adjacent existing corridor design guidelines to ensure overall corridor consistency. Materials will be selected based on existing infrastructure and standard engineering practices.

5. Will this project, when seen collectively with other projects, likely result in cumulative impacts to landscape character, views, or visual quality? **(Identify any projects [both state and local] in the area that have been constructed in recent years and those currently planned for future construction. The window of time and the extent of area applicable to possible cumulative impacts should be based on a reasonable anticipation of the viewing public's perception.)** Will the project components visually enhance the existing or future project setting?

- ☐ Cumulative impacts likely: 0–5 years (3)
- ☐ Cumulative impacts likely: 6–10 years (2)
- ☐ Potential for visual enhancement
- ☒ Cumulative impacts unlikely (1)
- ☐ No potential for cumulative impacts (0)
- ☐ Visually enhancing project features

Assumptions/issues: Cumulative impact analyses conducted for the North I-25 EIS concluded that the patterns of growth in the I-25 corridor north of US 36 will likely continue, regardless of whether improvements to I-25 are implemented. Therefore, the visual character of the community is not expected to change due to the proposed alternatives to I-25 from US 36 to 104th Avenue, because the project area is fully developed.

Viewer Sensitivity

6. What is the potential for the project proposal to become controversial within the community or to be opposed by the public or any organized group? **(This can be researched initially by talking with the state DOT and local agency management and local or regional planning staff familiar with the affected community's sentiments as evidenced by past projects and/or current information.)** Will the project components visually enhance the existing or future project setting?

☐ High potential (3)	☒ Low potential (1)
☐ Moderate potential (2)	☐ No potential (0)
☒ Potential for visual enhancement	☐ Visually enhancing project features

Assumptions/issues: Previous NEPA studies for the project area have not identified community concerns for the project. The public comments from the North I-25 PEL open house meetings, the NEPA-level planning meetings in the 2018 timeframe, and this project's stakeholder meetings and public meetings in Summer 2024 and Fall 2025 showed support for the proposed project improvements.

7. How sensitive are viewers likely to be to the scale and character of visible project features? **(Consider among other factors the number of viewers within the group, probable viewer expectations, activities, viewing duration, and orientation. The expected viewer sensitivity level may be scoped by applying professional judgment and by soliciting information from other DOT staff, local agencies, and community representatives familiar with the affected community's sentiments and demonstrated concerns.)** Will the project components visually enhance the existing or future project setting?

☐ High sensitivity (3)	☐ Low sensitivity (1)
☒ Moderate sensitivity (2)	☐ Insensitive (0)
☒ Potential for visual enhancement for viewers	☐ Visually enhancing project features for viewers

Assumptions/issues: Viewer groups include I-25 travelers, residents, park and open space visitors, trail users, commercial shoppers, and viewers from the medical complex at the I-25 and Thornton Parkway interchange area. I-25 travelers will experience changes associated with the roadway and bridge improvements. However, little will change visually for them because they move through the corridor quickly. Residential views south of the 84th Avenue bridge and at the northeast corner of the 88th Avenue bridge intersection are screened by noise walls. Views of I-25 by other residents in the project area are screened or minimized by open space buffers. From the medical complexes near Thornton Parkway, views of the project are generally set back from the interstate. Commercial areas are also set back from the project and are generally within large building complexes that block views and noise. Recreation users from Niver Creek Open Space, Niver Creek Trail and Civic Center Park will have the most direct view of the Project from adjacent parks, open spaces, and trails. They will likely be the viewers most impacted during construction and will also experience a permanent change in views due to realignment of the trail on the west side of I-25 and conversion of the existing underground Niver Creek box culvert to an open channel.

All viewers are likely to notice the changes to the 88th Avenue Bridge. Since these changes will visually enhance the bridge's current structure, sensitivity to the changes is expected to be minor.

8. Are there applicable laws, ordinances, regulations, policies, or standards that would affect or influence this project?

☐ Yes, complex Federal/State laws and regulations (3) ☐ Yes, minor agency policies/ planning standards (1)
☐ Yes, Federal/State/Local agency policies or standards (2) ☒ No (0)

Assumptions/issues: Project improvements are included in the DRCOG **Metro Vision Plan,** and previous NEPA studies have not identified community concerns for the project.

9. Will the project change, or visually enhance, the views or character of visually sensitive public use areas, historic properties, or scenic designations? **(Identify proximity and potential visual influence of the proposed project to parks, open space, trails, vistas and protected viewsheds, historic properties, Colorado Byways, Wild and Scenic Rivers, and other scenic designations.)**

☐ Yes, changes would be visually dominant within open views (3) ☐ Potentially, changes would be partially screened and/or visually subordinate (1)
☒ Yes, changes would be visually apparent within open views (2) ☐ Not visible (0)
☐ Potential for visual enhancement ☐ Visually enhancing project features

Assumptions/issues: The Niver Creek Open Space and Niver Creek Trail are expected to have visual changes overall, including a permanent realignment of the trail on the west side of I-25 and conversion of the existing underground Niver Creek box culvert to an open channel. Recreational users will be most directly affected by the changes, both temporarily during construction with detours, and permanently due to the trail realignment.

The historic resources that have the highest interaction with the project are a farmstead north of 80th Avenue and east of I-25 and a Post-War subdivision, however potentially historic resources exist throughout the project corridor. Depending on the location of the CDOT maintenance facility, a new fenced industrial use could be visible from both the historic farmstead and subdivision. While proposed infrastructure is getting wider, elevation changes are not anticipated. Therefore, the visual quality for adjacent historic resources throughout the corridor would demonstrate minimal change and mitigation measures would be implemented through additional noise walls.

10. Will a more detailed visual analysis assist in the screening of alternatives or project design? **(Consider the proposed project features, possible visual impacts, and probable mitigation recommendations.)** Will the project components visually enhance the existing or future project setting?

☐ Project impacts would likely require complex mitigation (3) ☐ Minor impacts anticipated (1)
☒ Project impacts may require standard mitigation (2) ☐ No impacts anticipated (0)
☐ Potential for visual enhancement ☐ Visually enhancing project features

Assumptions/issues: The project is expected to result in noticeable but context-compatible visual changes within the corridor. While most viewers are screened from direct views of the highway by existing noise walls or driving quickly through the corridor, the project includes the addition of one new noise wall and the replacement, extension, and height increase of a few existing noise walls to meet noise abatement requirements. Recreational users will be most affected by the changes but only temporarily during construction. Additional visual analysis would not be expected to change the features of the proposed action.

VIA Requirements

Requirements	Description
Date of Assessment	August 14, 2024, Updated August 5, 2026
VIA Requirements: Based on initial scoping, collaboration with CDOT, and the VIA Scoping Questionnaire score, this level of analysis and documentation is required:	☐ VIA not required **(Score 0-9)**[1] ☒ VIA Memorandum **(Score 10-19)** ☐ Standard VIA **(Score 20-30)**
☐ VIA not required **(Score 0-9)**	Consider this as the visual resource clearance for I-25 US 36 to 104th Avenue Safety and Operations Improvements. If the scope of work changes or additional information warrants further review and analysis, a reevaluation may be required.
☒ VIA Memorandum **(Score 10-19)**	Score = 15
☐ Standard VIA **(Score 20-30)**	

The level of the VIA can initially be based on the following ranges of total scores:

Score 0 to 9: VIA Not Required
No noticeable visual or physical changes to the environment are proposed; therefore, no further analysis is required. The VIA questionnaire and a project memo may be used to document that there is no effect and to explain the approach used for the determination.

Score 10 to 19: VIA Memorandum
A **VIA Memorandum** addressing minor visual issues, indicating the nature of the limited impacts and identifying any necessary mitigation strategies that should be implemented, would likely be sufficient, along with an explanation of why no further analysis is required.

Score 20 to 30: Standard VIA
A **Standard VIA** is recommended. This technical study will likely receive extensive local, perhaps statewide, public review. It would typically include several visual simulations. It would also include a thorough examination of public planning and policy documents supplemented with a direct public engagement process (usually part of the overall NEPA public scoping and stakeholder involvement) to determine visual preferences.