



COLORADO

Department of Transportation

Region 1

2000 South Holly Street
Denver, CO 80222

April 15, 2014

Mr. Richard Horstmann, P.E.
Project Manager

Ms. Allison Michael
United States Department of Interior Fish and Wildlife Service
Ecological Services
P.O. Bo.x 25486, DFC (65412)
Denver Federal Center
Lakewood, CO 80225-0486

Dear Ms. Michael:

The Colorado Department of Transportation, in cooperation with the Federal Highway Administration, is conducting a Planning and Environmental Linkages (PEL) Study to evaluate transportation improvements along southbound Interstate 225 (I-225) between Yosemite Street and Interstate 25 (I-25) in Denver, Colorado (**Figure 1**). The purpose of this PEL Study is to reduce existing and future traffic congestion and travel time along this segment of southbound I-225. The PEL Study includes the development of various roadway concepts, an evaluation of the environmental resources within the project area and the potential to have an impact on them, coordination with other federal, state, and local agencies (City and County of Denver, City of Aurora, City of Greenwood Village), and public involvement.

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Your agency is invited to participate in this Study to provide valuable input as a Resource Agency, and to submit any comments you might have. One thing we would specifically like for your agency to review is the Existing Conditions Report that has been prepared by the PEL project team, and which has been sent to you along with this letter. The Existing Conditions Report documents the types and conditions of resources identified within the project area, and lays the foundation for the development and screening of alternatives as we move forward.



If your agency would provide written feedback on the report, even if it were only that you have reviewed the report and that it appears to be complete, that would be of great assistance to the project and our efforts moving towards implementation of a solution for this heavily congested corridor while minimizing and avoiding environmental impacts to sensitive resources.

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If you have any comments or concerns about the Study or the Existing Conditions Report, feel free to contact me, or our Fellsburg Holt & Ullevig consultant project manager Michelle Stevens - contact information is provided below.

All documentation regarding the PEL Study for this corridor can be found at the following website link: <http://www.coloradodot.info/projects/I-225pel>

We look forward to your response to this invitation and your participation and input as a Resource Agency on this project, as well as your comments on the Existing Conditions Report.

Sincerely,



Richard Horstmann, P.E.
Project Manager
Colorado Department of Transportation
(303) 757-8672
Richard.Horstmann@state.co.us
2000 South Holly Street, Denver, CO 80222



Michelle K. Stevens, P.E., M.B.A.
Project Manager
Fellsburg Holt & Ullevig
6300 South Syracuse Way, Suite 600
Centennial, CO 80111
Phone: (303) 721-1440 ext. 8929
Fax: (303) 721-0832
michelle.stevens@fhueng.com
www.fhueng.com

Cc

Jerome Estes, CDOT Resident Engineer
Kevin Maddoux, FHU Deputy Project Manager and Environmental Task Lead
Troy Haluska, CDOT Planning and Environmental Linkages Program Manager
Jordan Rudel, CDOT Region 1 Senior Environmental Specialist





Figure 1 - I-225, Yosemite Street to I-25 PEL Study Area





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April 15, 2014

Mr. Richard Horstmann, P.E.
Project Manager

Mr. Steve Gunderson
Colorado Department of Public Health and Environment
Water Quality Control Division
4300 Cherry Creek Drive South
Denver, CO 80246

Dear Mr. Gunderson:

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Colorado Department of Transportation
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Richard.Horstmann@state.co.us
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Jerome Estes, CDOT Resident Engineer
Kevin Maddoux, FHU Deputy Project Manager and Environmental Task Lead
Troy Haluska, CDOT Planning and Environmental Linkages Program Manager
Jordan Rudel, CDOT Region 1 Senior Environmental Specialist





Figure 1 - I-225, Yosemite Street to I-25 PEL Study Area





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Department of Transportation

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2000 South Holly Street
Denver, CO 80222

April 15, 2014

Mr. Richard Horstmann, P.E.
Project Manager

Ms. Liza Hunholz
Area Wildlife Manager
Colorado Parks and Wildlife
Northeast Region Service Center
6060 Broadway
Denver, CO 80216

Dear Ms. Hunholz:

The Colorado Department of Transportation, in cooperation with the Federal Highway Administration, is conducting a Planning and Environmental Linkages (PEL) Study to evaluate transportation improvements along southbound Interstate 225 (I-225) between Yosemite Street and Interstate 25 (I-25) in Denver, Colorado (**Figure 1**). The purpose of this PEL Study is to reduce existing and future traffic congestion and travel time along this segment of southbound I-225. The PEL Study includes the development of various roadway concepts, an evaluation of the environmental resources within the project area and the potential to have an impact on them, coordination with other federal, state, and local agencies (City and County of Denver, City of Aurora, City of Greenwood Village), and public involvement.

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Colorado Department of Transportation
(303) 757-8672
Richard.Horstmann@state.co.us
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Cc

Jerome Estes, CDOT Resident Engineer
Kevin Maddoux, FHU Deputy Project Manager and Environmental Task Lead
Troy Haluska, CDOT Planning and Environmental Linkages Program Manager
Jordan Rudel, CDOT Region 1 Senior Environmental Specialist





Figure 1 - I-225, Yosemite Street to I-25 PEL Study Area





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2000 South Holly Street
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April 15, 2014

Mr. Richard Horstmann, P.E.
Project Manager

Ms. Dana Allen
NEPA Compliance Sector Lead
United States Environmental Protection Agency
1595 Wynkoop Street
Denver, CO 8020-1129

Dear Ms. Allen:

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Sincerely,



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Jerome Estes, CDOT Resident Engineer
Kevin Maddoux, FHU Deputy Project Manager and Environmental Task Lead
Troy Haluska, CDOT Planning and Environmental Linkages Program Manager
Jordan Rudel, CDOT Region 1 Senior Environmental Specialist





Figure 1 - I-225, Yosemite Street to I-25 PEL Study Area





COLORADO

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2000 South Holly Street
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April 15, 2014

Mr. Richard Horstmann, P.E.
Project Manager

Mr. Edward C. Nichols
State Historic Preservation Officer
Colorado Historical Society
1200 Broadway
Denver, CO 80203

Dear Mr. Nichols:

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Jordan Rudel, CDOT Region 1 Senior Environmental Specialist





Figure 1 - I-225, Yosemite Street to I-25 PEL Study Area





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April 15, 2014

Mr. Richard Horstmann, P.E.
Project Manager

Mr. Bill DeGroot, PE
Floodplain Management Program, Manager
Urban Drainage and Flood Control District
2480 West 26th Avenue, Suite 156-B
Denver, CO 80211

Dear Mr. DeGroot:

The Colorado Department of Transportation, in cooperation with the Federal Highway Administration, is conducting a Planning and Environmental Linkages (PEL) Study to evaluate transportation improvements along southbound Interstate 225 (I-225) between Yosemite Street and Interstate 25 (I-25) in Denver, Colorado (**Figure 1**). The purpose of this PEL Study is to reduce existing and future traffic congestion and travel time along this segment of southbound I-225. The PEL Study includes the development of various roadway concepts, an evaluation of the environmental resources within the project area and the potential to have an impact on them, coordination with other federal, state, and local agencies (City and County of Denver, City of Aurora, City of Greenwood Village), and public involvement.

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Figure 1 - I-225, Yosemite Street to I-25 PEL Study Area





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April 15, 2014

Mr. Richard Horstmann, P.E.
Project Manager

Mr. Matthew Montgomery
United States Army Corps of Engineers, Omaha District
Denver Regulatory Office
9307 S. Wadsworth Blvd.
Littleton, CO 80218-6901

Dear Mr. Montgomery:

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Jordan Rudel, CDOT Region 1 Senior Environmental Specialist





Figure 1 - I-225, Yosemite Street to I-25 PEL Study Area





COLORADO PARKS & WILDLIFE

6060 Broadway • Denver, Colorado 80216
Phone (303) 297-1192
cpw.state.co.us

April 29, 2014

Richard Horstmann, P.E.
Project Manager
Colorado Department of Transportation (CDOT)
Region 1
2000 S. Holly Street
Denver, Colorado 80222

RE: Interstate Highway 225 (I-225) Planning and Environmental Linkages (PEL) Study

Dear Mr. Horstmann:

Thank you for the opportunity to participate in the I-225 PEL study and to provide feedback on the *I-225 Existing Conditions Assessment Report*. The mission of Colorado Parks and Wildlife (CPW) is to perpetuate the wildlife resources of the state, to provide a quality state parks system, and to provide enjoyable and sustainable outdoor recreation opportunities that educate and inspire current and future generations to serve as active stewards of Colorado's natural resources. Our goal in responding to land use proposals such as this is to provide complete, consistent, and timely information to all entities who request comment on matters within our statutory authority.

District Wildlife Manager Justin Olson recently analyzed the project site and *Existing Conditions Report*. In conclusion, CPW has no objections to any of the findings listed in the report and encourages all participating entities to continue adhering to applicable local, state, and federal laws and regulations. Effects to any wildlife species within the project and study area can be characterized as minimal due to the low availability of undisturbed habitat adjacent to the I-225 corridor.

The observed prairie dog colony within the project and study area has the potential for the presence of burrowing owls should any modifications to the habitat area be done. Burrowing owls live on flat, treeless land with short vegetation, and nest underground in burrows dug by prairie dogs, badgers, and foxes. These raptors are classified as a state threatened species and are protected by both state and federal laws, including the Migratory Bird Treaty Act. These laws prohibit the killing of burrowing owls or disturbance of their nest. Therefore, if any earth-moving will begin between March 1st and October 31st, a burrowing owl survey should be performed. Guidelines for performing a burrowing owl survey can be obtained from your local District Wildlife Manager. Care should also be taken to make sure no raptor nests or other migratory bird nests will be impacted during this project. Raptors and other migratory bird species are protected from take, harassment, and nest disruption at both the state and federal levels. CPW recommends that buffer zones be implemented around any nest discovered within the project vicinity during any period of activity that may interfere with nesting season. This will prevent the intentional or unintentional destruction of an active nest. For further information on this topic, specifically raptors, a copy of the document "Recommended Buffer Zones and Seasonal Restrictions for Colorado Raptors," is available from your local District Wildlife Manager. Following the recommendations outlined in this document will decrease the likelihood of unintentional take through disturbance.

Due to this Project's proximity and relative location to Cherry Creek, a known location and habitat area for the Preble's Meadow Jumping Mouse, CPW recommends that consultation with the USFWS be made to ensure compliance with any threatened or endangered species provisions and block habitat clearances.

STATE OF COLORADO

John W. Hickenlooper, Governor • Mike King, Executive Director, Department of Natural Resources
Bob D. Broscheid, Director, Colorado Parks and Wildlife
Parks and Wildlife Commission: Robert W. Bray • Chris Castilian, Secretary • Jeanne Home
Bill Kane, Chair • Gaspar Perricone • James Pribyl • John Singletary
Mark Smith, Vice-Chair • James Vigil • Dean Wingfield • Michelle Zimmerman
Ex Officio Members: Mike King and John Salazar

Current CPW policy directs our efforts towards proposals that will potentially have high impacts to wildlife and wildlife habitat. The emphasis of CPW's concerns is on large acreages, critical habitats, wildlife diversity, and impacts to species of special concern, or those that are state or federally endangered. Due to the lack of quality wildlife habitat within the project and study area, any impacts from the development can be characterized as minimal.

This may not mean that the landscape has no value to wildlife or value to the community. It is important to remember that incremental and cumulative loss of natural areas and open spaces will, over time, significantly degrade the overall quality of wildlife habitat in the area. Therefore, in this case, we want to focus our recommendations on planning and implementing your proposal to minimize negative impacts and maximize potential enhancements to support living with wildlife in our community. If you have any further questions, please contact District Wildlife Manager Justin Olson at (303) 291-7131.

Sincerely,

A handwritten signature in black ink, appearing to read "Liza Hunholz", with a long, sweeping flourish extending to the right.

Liza Hunholz
Area Wildlife Manager

Cc: S. Yamashita, T. Kroening, J. Olson



United States Department of the Interior



FISH AND WILDLIFE SERVICE
COLORADO FIELD OFFICE/LAKEWOOD
P.O. BOX 25486, DENVER FEDERAL CENTER
DENVER, COLORADO 80225-0486

IN REPLY REFER TO:
ES/CO: CDOT
TAILS: 06E24000-2014-TA-0548

APR 29 2014

Richard Horstmann
Colorado Department of Transportation, Region 1
2000 South Holly Street
Denver, Colorado 80222

Dear Mr. Horstmann:

Based on the authority conferred to the U.S. Fish and Wildlife Service (Service) by the Fish and Wildlife Act of 1956 (916 U.S.C. 742(a)-754); Fish and Wildlife Coordination Act (FWCA - 16 U.S.C. 661-667(e)); National Environmental Policy Act of 1969 (NEPA - 42 U.S.C. 4321-4347); Department of Transportation Act (49 U.S.C. 1653(f)), and; Endangered Species Act of 1973, as amended (ESA - 50 CFR §402.14), as well as multiple Executive Orders, policies and guidelines, and interrelated statutes to ensure the conservation and enhancement of fish and wildlife resources (e.g., Migratory Bird Treaty Act (MBTA - 16 U.S.C. 703), and Bald and Golden Eagle Protection Act (BGEPA - 16 U.S.C. 668)), the Service reviewed your April 15, 2014, request to review the **I-225 Planning and Environmental Linkage (PEL) Study in the City and County of Denver, Colorado**. The purpose of the study is to evaluate transportation improvements along southbound I-225 between Yosemite Street and I-25.

At this time, there are no species listed under the ESA that will be directly affected by your project; however, the species downstream in the Platte River will be affected by depletions caused by your project, but these depletions have been analyzed programmatically through a biological opinion with the Federal Highway Administration (April 4, 2012), and will be reported annually to the Service.

In addition, we appreciate CDOT's efforts to avoid impacts to migratory birds; however, the Existing Conditions Report states that nesting generally occurs between February 15 and July 15, but CDOT's guidelines recommend avoiding work between April 1 and August 31 in order to minimize impacts to nesting birds. Also, please note that many raptors begin nesting much earlier, so we recommend following the Colorado Division of Wildlife's (now Colorado Parks and Wildlife) 2008 Recommended Buffer Zones and Seasonal Restrictions for Colorado Raptors.

As you are likely aware, once you have chosen an alternative and are ready to proceed with the project, you'll need to revisit the project's impacts to federally protected species. Thanks for the opportunity to comment. Please let me know if you have any questions.

If the Service can be of further assistance, please contact Alison Deans Michael of my staff at 303 236-4758.

Sincerely,



Susan C. Linner
Colorado Field Supervisor

cc: CDOT, HQ (Jeff Peterson, Troy Halouska)
Michael

Ref: Alison\H:\My Documents\CDOT 2007+\Region I\I-225_PEL_comments.docx

STATE OF COLORADO

John W. Hickenlooper, Governor
Larry Wolk, MD, MSPH
Executive Director and Chief Medical Officer

Dedicated to protecting and improving the health and environment of the people of Colorado

4300 Cherry Creek Dr. S.
Denver, Colorado 80246-1530
Phone (303) 692-2000
Located in Glendale, Colorado
www.colorado.gov/cdphe



Colorado Department
of Public Health
and Environment

May 9, 2014

Richard Horstmann, PE
Project Manager
Colorado Department of Transportation (CDOT)
Region 1
2000 S. Holly Street
Denver, Colorado 80222

RE: Interstate Highway 225 (I-225) Planning and Environmental Linkages (PEL) Study

Mr. Horstmann,

Thank you for the opportunity to provide feedback on the *I-225 Existing Conditions Assessment Report* as part of the I-225 PEL study. We applaud the environmental efforts and vision of the study team members to help define the baseline conditions for the facilitation of developing transportation improvements along I-225.

At this time, the WQCD has looked over the water quality portions of the report and does not have any concerns or recommendations. The WQCD is relying on the project team to comply with all required regulations and permits once the project begins. We look forward to the project and seeing how it handles the specific water quality for the improvements along I-225 between Yosemite Street and Interstate 25 (I-25).

Sincerely,

Jean Cordova
CDOT/CDPHE Water Quality Liaison



May 19, 2014

Richard Horstman, P.E.
Project Manager
Colorado Department of Transportation
2000 South Holly Street
Denver, CO 80222

Re: I-225 Existing Conditions Assessment Report for Interstate Highway 225 Planning and Environmental Linkages (PEL) Study. (CHS #65830)

Dear Mr. Horstman,

Thank you for your submission dated April 15, 2014 and received by our office on April 17, 2014 for comment by our office. After review of the PEL study, we offer the comments listed below.

- Page xxii: The report states that “there are no historic properties within the study area.” This is a misleading finding. A file search was conducted, but no consultation with our office was completed in regards to a field survey. A more accurate statement would be that there are no *known* historic properties within the study area.
- Page 64: An overall general comment under this section is that Section 106 has been arbitrarily applied to fit the PEL process for Historic Resources. Under Section 106, the Area of Potential Effects (APE) is determined in consultation with our office and other consulting parties, as stipulated in 36 CFR 800.4(a)(1). It does not appear this consultation took place during the PEL development. Any reference to APE should be removed from this discussion.
- Page 64: COMPASS database is a tool to identify cultural resources, but should not be used to make assumptions that there are no historic properties located in the project area.
- Page 64: A field survey is referenced, but no information was sent to our office for comment and concurrence. This information can be used to guide discussion on the occurrence of historic resources, but without formal consultation with our office on National Register eligibility, the information is lacking.
- Page 64: The report discusses “age-eligible sites” within the Area of Potential Effects. The fifty-year rule established by the National Park Service is a rule of thumb and properties less than fifty-years old can be eligible for the National Register of Historic Places.
- Page 64: Under Cultural Resources section there is no discussion of the potential for the occurrence of archaeological sites.

If we may be of further assistance, please contact Amy Pallante, our Section 106 Compliance Manager, at (303) 866-4678.

Sincerely,

Edward C. Nichols
State Historic Preservation Officer



June 30, 2014

Michelle K. Stevens
Felsburg Holt & Ullevig
6300 South Syracuse Way, Suite 600
Centennial, CO 80111

6924 S. Lima Street
Centennial, Colorado 80112-3853
Phone: 720-874-6500
Fax: 720-874-6611
TDD: 720-874-6574
www.arapahoegov.com
publicworks@arapahoegov.com

DAVID M. SCHMIT, P.E.
Director

RE: I-225 – YOSEMITE TO I-25 PEL STUDY, ARAPAHOE COUNTY COMMENTS REGARDING TIER III SCREENING OF ALTERNATIVES

Dear Ms. Stevens;

This letter is in reference to the Tier III screening of the remaining Tier II alternatives. With regard to Arapahoe County comments on the screening, we offer the following:

1. Generally the evaluation and matrix appears to be well prepared and thought out. However, the data, analysis, and technical information was not provided that supports the conclusions and summary statements in the matrix. Said information will need to be provided at some point (I suspect with the review draft of the PEL Report) to allow the County to review and fully concur with the findings presented in the Tier III matrix.
2. A discussion needs to be provided under the Summary of Results for Alternative #19. This summary should discuss the reasons that the alternative was chosen over the other alternatives, thus summarizing the pros/cons of the alternative and why it is the selected alternative. Defining what are differentiators for this alternative is needed.
3. Expand the summary discussion for Alternative #17 to more fully describe the reason for elimination. A discussion on defining the terms "Not Recommended" vs "eliminated" is also required.
4. Since the operational analysis is not provided, it would be beneficial to show data related to impacts to the local street network. We have not seen data that supports the claims made in the matrix evaluation for each alternative. Until such information is provided, we are not able to adequately comment on such impacts or conclusions.
5. With regard to the safety analysis, did the process include the FHWA Highway Safety Manual Predictive Methods for evaluation of each alternative? Hopefully, use of this method provides a quantitative process for comparing alternatives. It appears that the

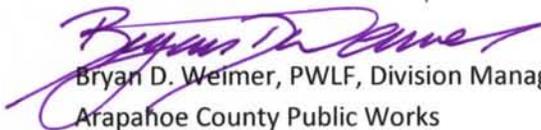
evaluation presented in the matrix was qualitative based on conflict points. At this level of evaluation, quantitative rather than qualitative is more appropriate.

6. Under the Environmental Evaluation categories, the criteria discuss "Avoid/Minimize" Impact. What is considered "minimal"? It looks like some alternatives have lesser impacts than others but all are considered not meeting the criteria. It appears that the matrix only looks at avoidance rather than avoid or minimize.
7. While the summary indicates that Alternative #17 would have no impacts to the local area roadway network, we believe (without seeing analysis) that there is a likelihood to induce additional traffic onto Yosemite Street with the possibility of adversely impacting the local roadway network in residential areas. This could occur with Alternative #17 by removing the DTC Ramp and shifting traffic to the Yosemite Ramp.

Based on the above, the information provided to date, and in particular our concerns with Alternative #17; Arapahoe County concurs with the recommendation of the Tier III evaluation of advancement of Alternative #19.

Thanks to you and CDOT for involving Arapahoe County in this much needed study and improvements to I-225. Although the improvements being recommended are within the City and County of Denver, Arapahoe County citizens and workers will benefit from these efforts. If you have questions or need further information, please do not hesitate in contacting me at your convenience.

Sincerely,


Bryan D. Weimer, PWLF, Division Manager – Transportation
Arapahoe County Public Works

cc: David M. Schmit, Director
Brian R. Love, CIP Manager
Rich Horstmann, CDOT Region 1
Joy McGee, Greenwood Village
Mac Callison, City of Aurora
Steve Klausung, Denver South TMA
File (I-225 PEL)
Reader

Greenwood Village

PUBLIC WORKS DEPARTMENT

10001 EAST COSTILLA AVENUE • GREENWOOD VILLAGE, COLORADO 80112-3730 • MAIN: (303) 708-6100 • FAX: (303) 706-1976

July 3, 2014

Michelle K. Stevens
Felsburg Holt & Ullevig
6300 South Syracuse Way, Suite 600
Centennial, CO 80111

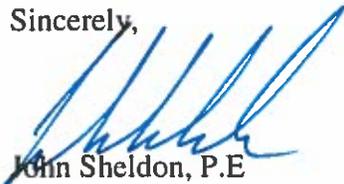
I-225 – Yosemite to I-25 PEL Study, City of Greenwood Village Comments on Screening of Alternatives

Dear Ms. Stevens;

This letter summarizes the City of Greenwood Village's comments with regards to the Tier III screening of alternatives. In general we agree with the screening matrix. However, we want to add that, in our opinion, the removal of the DTC Boulevard slip ramp will add delay and impacts to the local roadway network by increasing traffic on Yosemite Street. It appears from the screening matrix that the delay at the north Yosemite Street ramp intersection is less in Alternative 17. We question that if all of that traffic is now traveling through the Yosemite intersection that the delay would be higher. Also, in addition to the listed direct local business impacts, we feel the removal of the slip ramp would have an indirect impact on businesses by eliminating the direct access from I-225. We request that Alternative 17 be changed from "not recommended" to "eliminated".

Thank you for the opportunity to comment on the screening matrix. Should you have any questions, please call me at (303) 708-6100

Sincerely,



John Sheldon, P.E.
Public Works Director

Copy: Tom Bishop, City Council District 4
T.J. Gordon, City Council District 4
Ronald Rakowsky, Mayor
Jim Sanderson, City Manager
Heather Vidlock, Community Development Director
Joy McGee, Planning Manager
Jeremy Hanak, Public Works Manager - Traffic



Denver Public Works
Office of the Executive Director

201 West Colfax Avenue, Dept 608
Denver, CO 80202
P: 720-865-8630
F: 720-865-8795
www.denvergov.org/dpw

July 25, 2014

Michelle K. Stevens, P.E., M.B.A.
Felsburg Holt & Ullevig
6300 South Syracuse Way, Suite 600
Centennial, CO 80111

I-225 – Yosemite to I-25 PEL Study, City of Denver Comments on Screening Alternatives

Dear Ms. Stevens:

This letter summarizes the City of Denver's comments with regards to the Tier III screening of alternatives within the I-225 PEL Study. In general we agree with conclusions presented in the screening matrix. However, we want to add that in our opinion the removal of the DTC Boulevard slip ramp, as shown in Alternate 17, will add delay and impacts to the local roadway network and reduce access into the Denver Tech Center for both resident and business trips. We feel removal of the slip ramp would also have an indirect impact on businesses by eliminating the direct access from I-225.

In addition, the screening matrix suggests that in Alternative 17, the north Yosemite Street ramp intersection can accommodate the additional traffic without affecting the LOS. We respectfully disagree that the intersection is unaffected as we think the redirected traffic would cause additional delay and degradation to the LOS. The City of Denver prefers Alternative 19 and we request that Alternative 17 be changed from "not recommended" to "eliminated".

Thank you for the opportunity to comment on the screening matrix. Should you have any questions, please call me at 720-865-8719.

Sincerely,

A handwritten signature in blue ink that reads "Lesley Thomas".

Lesley Thomas
City Engineer/Deputy Director
Denver Public Works

Copy: Peggy Lehmann, Council District #4
Jose Cornejo, Public Works Executive Director
Crissy Fanganello, Director of Transportation
Michael Finocchio, Interim City Traffic Engineer
Justin Schmitz, Traffic Engineer
Karen Good, Policy, Planning & Sustainability



September 15, 2014

Mr. Chuck Culig
Regional Transportation District
1600 Blake Street
Denver, CO 80202-1399

SUBJECT: I-225 (Yosemite Street to I-25) Planning and Environmental Linkages (PEL) Study

Dear Technical Working Group Member:

The Colorado Department of Transportation (CDOT) is excited to announce completion of the I-225 (Yosemite Street to I-25) Planning and Environmental Linkages (PEL) Study and would like to thank you for your engagement in the study and participation on the Technical Working Group.

The PEL process was followed for this study based on concurrence by CDOT and the Federal Highway Administration (FHWA) that this study met the PEL process criteria. Through this process, the evaluation and findings of the I-225 PEL study can be readily applied to subsequent National Environmental Policy Act (NEPA) documentation. It is our belief that this streamlining effort will result in time and cost savings on future NEPA studies conducted within the project area. Major strengths of the corridor study were the meaningful consensus building to provide a Recommended Alternative for southbound I-225 and the I-225/DTC Boulevard interchange.

This consensus building was an integral part of the success of the process, and it could not have been achieved without your involvement and support of the study. To strengthen the outcome of the PEL process, we respectfully request that you provide a letter of support for the I-225 PEL Study and the Recommended Alternative. Your letter will be welcomed and greatly appreciated.

Mr. Chuck Culig
September 15, 2014

CDOT looks forward to continuing to work with you, FHWA, and the other local agencies to realize the transportation goals along southbound I-225. We appreciate and commend the efforts that you, the Technical Working Group, and the project team have undertaken to conduct this PEL study. If you have any questions regarding this letter, please feel free to contact me at (303) 757-9672 (richard.horstmann@state.co.us) or Jerome Estes at (303) 757-9295 (jerome.estes@state.co.us). Thank you.

Sincerely,



Richard Horstman, PE
CDOT Region 1
Project Manager

cc: Dahir Egal, FHWA
Carrie DeJiacomo, CDOT Region 1
Jerome Estes, CDOT Region 1
Jordan Rudel, CDOT Region 1
Jason Nelson, CDOT Region 1
Leela Rajasekar, CDOT Region 1
Troy Halouska, CDOT EPB

Bryan Weimer, Arapahoe County
Karen Good, City and County of Denver
Joy McGee, City of Greenwood Village
Mac Callison, City of Aurora
Steve Cook, DRCOG



September 15, 2014

Mr. Steve Cook
MPO Planning Program Manager
Denver Regional Council of Governments
1290 Broadway, Suite 700
Denver, CO 80203-5606

SUBJECT: I-225 (Yosemite Street to I-25) Planning and Environmental Linkages (PEL) Study

Dear Technical Working Group Member:

The Colorado Department of Transportation (CDOT) is excited to announce completion of the I-225 (Yosemite Street to I-25) Planning and Environmental Linkages (PEL) Study and would like to thank you for your engagement in the study and participation on the Technical Working Group.

The PEL process was followed for this study based on concurrence by CDOT and the Federal Highway Administration (FHWA) that this study met the PEL process criteria. Through this process, the evaluation and findings of the I-225 PEL study can be readily applied to subsequent National Environmental Policy Act (NEPA) documentation. It is our belief that this streamlining effort will result in time and cost savings on future NEPA studies conducted within the project area. Major strengths of the corridor study were the meaningful consensus building to provide a Recommended Alternative for southbound I-225 and the I-225/DTC Boulevard interchange.

This consensus building was an integral part of the success of the process, and it could not have been achieved without your involvement and support of the study. To strengthen the outcome of the PEL process, we respectfully request that you provide a letter of support for the I-225 PEL Study and the Recommended Alternative. Your letter will be welcomed and greatly appreciated.

Mr. Steve Cook
September 15, 2014

CDOT looks forward to continuing to work with you, FHWA, and the other local agencies to realize the transportation goals along southbound I-225. We appreciate and commend the efforts that you, the Technical Working Group, and the project team have undertaken to conduct this PEL study. If you have any questions regarding this letter, please feel free to contact me at (303) 757-9672 (richard.horstmann@state.co.us) or Jerome Estes at (303) 757-9295 (jerome.estes@state.co.us). Thank you.

Sincerely,



Richard Horstman, PE
CDOT Region 1
Project Manager

cc: Dahir Egal, FHWA
Carrie DeJiacomo, CDOT Region 1
Jerome Estes, CDOT Region 1
Jordan Rudel, CDOT Region 1
Jason Nelson, CDOT Region 1
Leela Rajasekar, CDOT Region 1
Troy Halouska, CDOT EPB

Bryan Weimer, Arapahoe County
Karen Good, City and County of Denver
Joy McGee, City of Greenwood Village
Mac Callison, City of Aurora
Chuck Culig, RTD



September 15, 2014

Mr. Mac Callison
Transportation Planning
City of Aurora
15151 E. Alameda Parkway
Aurora, CO 80012

SUBJECT: I-225 (Yosemite Street to I-25) Planning and Environmental Linkages (PEL) Study

Dear Technical Working Group Member:

The Colorado Department of Transportation (CDOT) is excited to announce completion of the I-225 (Yosemite Street to I-25) Planning and Environmental Linkages (PEL) Study and would like to thank you for your engagement in the study and participation on the Technical Working Group.

The PEL process was followed for this study based on concurrence by CDOT and the Federal Highway Administration (FHWA) that this study met the PEL process criteria. Through this process, the evaluation and findings of the I-225 PEL study can be readily applied to subsequent National Environmental Policy Act (NEPA) documentation. It is our belief that this streamlining effort will result in time and cost savings on future NEPA studies conducted within the project area. Major strengths of the corridor study were the meaningful consensus building to provide a Recommended Alternative for southbound I-225 and the I-225/DTC Boulevard interchange.

This consensus building was an integral part of the success of the process, and it could not have been achieved without your involvement and support of the study. To strengthen the outcome of the PEL process, we respectfully request that you provide a letter of support for the I-225 PEL Study and the Recommended Alternative. Your letter will be welcomed and greatly appreciated.

Mr. Mac Callison
September 15, 2014

CDOT looks forward to continuing to work with you, FHWA, and the other local agencies to realize the transportation goals along southbound I-225. We appreciate and commend the efforts that you, the Technical Working Group, and the project team have undertaken to conduct this PEL study. If you have any questions regarding this letter, please feel free to contact me at (303) 757-9672 (richard.horstmann@state.co.us) or Jerome Estes at (303) 757-9295 (jerome.estes@state.co.us). Thank you.

Sincerely,



Richard Horstman, PE
CDOT Region 1
Project Manager

cc: Dahir Egal, FHWA
Carrie DeJiacomo, CDOT Region 1
Jerome Estes, CDOT Region 1
Jordan Rudel, CDOT Region 1
Jason Nelson, CDOT Region 1
Leela Rajasekar, CDOT Region 1
Troy Halouska, CDOT EPB

Bryan Weimer, Arapahoe County
Karen Good, City and County of Denver
Joy McGee, City of Greenwood Village
Steve Cook, DRCOG
Chuck Cullig, RTD



September 15, 2014

Mrs. Lesley Thomas
City Engineer/Deputy Director
City and County of Denver
201 West Colfax Avenue, Dept 608
Denver, CO 80202

RE: I-225 PEL from Yosemite Street to I-25
City of Denver Comments on Screening Alternatives
FHU Reference No. 112200-01

Dear Mrs. Thomas,

We received your letter dated July 25, 2014 and appreciate your input on the subject PEL study. The letter included some concerns that we wanted to address. Please see your comment with our response shown in bold below:

Concern:

In general we agree with conclusions presented in the screening matrix. However, we want to add that in our opinion the removal of the DTC Boulevard slip ramp, as shown in Alternate 17, will add delay and impacts to the local roadway network and reduce access into the Denver Tech Center for both resident and business trips. We feel removal of the slip ramp would also have an indirect impact on businesses by eliminating the direct access from 1-225.

Response:

We discussed your Local Roadway Network concerns at a September 3rd meeting with the City and County of Denver and Arapahoe County. In response, we included the statement below to Section 3.2 Local Street Network of the PEL report:

The City and County of Denver, City of Greenwood Village, and Arapahoe County have expressed that they would need to see more detail on the impact of Alternative 17 on the local roadway network if this alternative were to be given any further consideration. Additional analysis would be needed with regard to added delay and degradation of the levels of service, perhaps employing a more sophisticated analysis tool than the regional model.

This quote is from the City and County of Denver letter dated July 25, 2014, "...We want to add that in our opinion the removal of the DTC Boulevard slip ramp, as shown in Alternate 17, will add delay and impacts to the local roadway network and reduce access into the Denver Tech Center for both resident and business trips. We feel removal of the slip ramp would also have an indirect impact on businesses by eliminating the direct access from I-225."

The model used for the PEL study was sufficient for the large scale traffic analysis required for comparison purposes between the alternatives for the study, but it is not adequate to analyze the specific impacts to the local network at the scale desired by the local agencies. Although there may be some added delays to the local roadway network, this level of analysis was not conducted as part of

this process and could be included in NEPA during the next steps if Alternative 17 were to be further evaluated.

Concern:

In addition, the screening matrix suggests that in Alternative 17, the north Yosemite Street ramp intersection can accommodate the additional traffic without affecting the LOS. We respectfully disagree that the intersection is unaffected as we think the redirected traffic would cause additional delay and degradation to the LOS. The City of Denver prefers Alternative 19 and we request that Alternative 17 be changed from "not recommended" to "eliminated."

Response:

For the analysis at the intersection of north Yosemite Street ramp intersection, we understand that the City and County of Denver feels there should be more traffic impacts due to the closure of the DTC off-ramp. We did add the comment mentioned above to address local impacts to the PEL report. Again, the model used for the PEL study was sufficient for the large scale traffic analysis required for comparison purposes between the alternatives for the study, but it is not adequate to analyze the specific impacts to the local network at the scale desired by the local agencies. Although there may be some added delays to the local roadway network, this level of analysis was not conducted as part of this process and could be included in NEPA during the next steps.

The term "not recommended" was used for Alternative Concept 17 because this concept meets the purpose and need for the project, and the potential impacts identified, including the potential additional delay due to closure of the slip ramp and the indirect impact on businesses, do not equal a magnitude of negative impacts that would warrant elimination of this alternative from future consideration. CDOT identified Alternative Concept 19 as the Recommended Alternative Concept for the southbound I-225 (Yosemite Street to I-25) project, taking into consideration the input from local agencies.

We thank you for your time in providing us with your comments on this important study.

Sincerely,



Rich Horstmann, P.E.

Colorado Department of Transportation
Region 1, South Engineering
2000 South Holly Street, Denver, CO 80222
(303) 757-9672
Richard.horstmann@state.co.us



September 15, 2014

Mr. Bryan Weimer
Division Manager - Transportation
Arapahoe County
6924 S. Lima Street
Centennial, CO 80112

RE: I-225 PEL from Yosemite Street to I-25
Arapahoe County Comments on Screening Alternatives
FHU Reference No. 112200-01

Dear Mr. Weimer,

We received your letter dated June 30, 2014, and appreciate your input on the subject PEL study. The letter included some concerns that we wanted to address. Please see your comment with our response shown in bold below.

Concern:

Item #1: Generally the evaluation and matrix appears to be well prepared and thought out. However, the data, analysis, and technical information were not provided that supports the conclusions and summary statements in the matrix. Said information will need to be provided at some point (I suspect with the review draft of the PEL Report) to allow the County to review and fully concur with the findings presented in the Tier III matrix.

Response:

The I-225 PEL study report includes the data, analysis and technical information that were not included as part of the review of the Tier 3 matrix. Appendix A of the I-225 PEL study report includes the *Environmental Analysis and Existing Conditions Assessment Report*, which documents current and anticipated future conditions of the interchange in regard to land use, the transportation system, and environmental resources. A supplement to the Safety Assessment Report (Appendix A of the *Environmental Analysis and Existing Conditions Assessment Report*) has been included that looks at the specific ramp intersections associated with the study interchanges. Appendix D of the I-225 PEL study report includes the Traffic Conditions Report, documents current and anticipated future conditions of the study area in regard to traffic operations and was used in the screening matrices. The Tier 1, 2, and 3 screening tables are included in Appendix C of the I-225 PEL study report for your reference.

Concern:

Item #2: A discussion needs to be provided under the Summary of Results for Alternative #19. This summary should discuss the reasons that the alternative was chosen over the other alternatives, thus summarizing the pros/cons of the alternative and why it is the selected alternative. Defining what are differentiators for this alternative is needed.

Response:

Chapter 2 of the I-225 PEL study report summarizes the results of the Tier 1, 2, and 3 alternative evaluation and identification of Alternative Concept 19 as the Recommended Alternative Concept. Appendix C includes the updated Tier 3 tables that include more information for selecting Concept 19 in the summary of results.

Concern:

Item #3: Expand the summary discussion for Alternative #17 to more fully describe the reason for elimination. A discussion on defining the terms "Not Recommended" versus "eliminated" is also required.

Response:

Chapter 2 of the I-225 PEL study report summarizes the results of the Tier 1, 2, and 3 alternative evaluation and identification of Alternative Concept 19 and the Recommended Alternative Concept. Section 2.4 of the I-225 PEL study report defines the terms "Not Recommended" versus "Eliminated." Appendix C includes the updated Tier 3 tables that include more information for not recommending Concept 17 in the summary of results.

Concern:

Item #4: Since the operational analysis is not provided, it would be beneficial to show data related to impacts to the local street network. We have not seen data that supports the claims made in the matrix evaluation for each alternative. Until such information is provided, we are not able to adequately comment on such impacts or conclusions.

Response:

We discussed your Local Roadway Network concerns at a September 3rd meeting with the City and County of Denver and Arapahoe County. In response, we included the statement below to Section 3.2 Local Street Network of the PEL report:

The City and County of Denver, City of Greenwood Village, and Arapahoe County have expressed that they would need to see more detail on the impact of Alternative 17 on the local roadway network if this alternative were to be given any further consideration. Additional analysis would be needed with regard to added delay and degradation of the levels of service, perhaps employing a more sophisticated analysis tool than the regional model.

This quote is from the City and County of Denver letter dated July 25, 2014, "...We want to add that in our opinion the removal of the DTC Boulevard slip ramp, as shown in Alternate 17, will add delay and impacts to the local roadway network and reduce access into the Denver Tech Center for both resident and business trips. We feel removal of the slip ramp would also have an indirect impact on businesses by eliminating the direct access from I-225."

The model used for the PEL study was sufficient for the large scale traffic analysis required for comparison purposes between the alternatives for the study, but it is not adequate to analyze the specific impacts to the local network at the scale desired by the local agencies. Although there may be some added delays to the local roadway network, this level of analysis was not conducted as part of this process and could be included in NEPA during the next steps if Alternative 17 were to be further evaluated.

Concern:

Item #5: With regard to the safety analysis, did the process include the FHWA Highway Safety Manual Predictive Methods for evaluation of each alternative? Hopefully, use of this method provides a quantitative process for comparing alternatives. It appears that the evaluation presented in the matrix was qualitative based on conflict points. At this level of evaluation, quantitative rather than qualitative is more appropriate.

Response:

At this time the HSM Predictive Methods does not have the roadway classifications we need to complete a detailed analysis for each alternative. Crash modification factors (CMF) cannot be utilized due to the uniqueness of the alternative designs to provide useful feedback to assist in the selection of a recommended alternative.

Concern:

Item #6: Under the Environmental Evaluation categories, the criteria discuss "Avoid/Minimize" Impact. What is considered "minimal"? It looks like some alternatives have lesser impacts than others but all are considered not meeting the criteria. It appears that the matrix only looks at avoidance rather than avoid and minimize.

Response:

Prior to mitigation, CDOT always makes the best efforts to avoid the impact altogether by not taking a certain action or parts of an action and to minimize impacts by limiting the degree or magnitude of the action and its implementation. However, if avoidance or minimization is not feasible then mitigation measures may be implemented. Further definition can be found in Section 4.8.3 of the CDOT NEPA Manual.

Concern:

Item #7: While the summary indicates that Alternative #17 would have no impacts to the local area roadway network, we believe (without seeing analysis) that there is a likelihood to induce additional traffic onto Yosemite Street with the possibility of adversely impacting the local roadway network in residential areas. This could occur with Alternative #17 by removing the DTC Ramp and shifting traffic to the Yosemite Ramp.

Response:

For the analysis at the intersection of north Yosemite Street ramp intersection, we understand that Arapahoe County feels there should be more traffic impacts due to the closure of the DTC off-ramp. We did add the comment mentioned above to address local impacts to the PEL report. Again, the model used for the PEL study was sufficient for the large scale traffic analysis required for comparison purposes between the alternatives for the study, but it is not adequate to analyze the specific impacts to the local network at the scale desired by the local agencies. Although there may be some added delays to the local roadway network, this level of analysis was not conducted as part of this process and could be included in NEPA during the next steps.

We thank you for your time in providing us with your comments on this important study.

Sincerely,

Mr. Bryan Weimer
September 15, 2014
Page 4

We thank you for your time in providing us with your comments on this important study.

Sincerely,

A handwritten signature in blue ink, appearing to read "Rich Horstmann", with a long horizontal flourish extending to the right.

Rich Horstmann, P.E.
Colorado Department of Transportation
Region 1, South Engineering
2000 South Holly Street, Denver, CO 80222
(303) 757-9672
Richard.horstmann@state.co.us



September 15, 2014

Mr. John Sheldon
Public Works Director
City of Greenwood Village
10001 east Costilla Avenue
Greenwood Village, CO 80112

RE: I-225 PEL from Yosemite Street to I-25
City of Greenwood Village Comments on Screening Alternatives
FHU Reference No. 112200-01

Dear Mr. Sheldon,

We received your letter dated July 3, 2014 and appreciate your input on the subject PEL study. The letter included some concerns that we wanted to address. Please see your comment with our response shown in bold below:

Concern:

In general we agree with the screening matrix. However, we want to add that, in our opinion, the removal of the DTC Boulevard slip ramp will add delay and impacts to the local roadway network by increasing traffic on Yosemite Street. It appears from the screening matrix that the delay at the north Yosemite Street ramp intersection is less in Alternative 17. We question that if all of that traffic is now traveling through the Yosemite intersection that the delay would be higher. Also, in addition to the listed direct local business impacts, we feel the removal of the slip ramp would have an indirect impact on businesses by eliminating the direct access from I-225. We request that Alternative 17 be changed from "not recommended" to "eliminated".

Response:

We discussed your Local Roadway Network concerns at a September 3rd meeting with the City and County of Denver and Arapahoe County. In response, we included the statement below to Section 3.2 Local Street Network of the PEL report:

The City and County of Denver, City of Greenwood Village, and Arapahoe County have expressed that they would need to see more detail on the impact of Alternative 17 on the local roadway network if this alternative were to be given any further consideration. Additional analysis would be needed with regard to added delay and degradation of the levels of service, perhaps employing a more sophisticated analysis tool than the regional model.

This quote is from the City and County of Denver letter dated July 25, 2014, "...We want to add that in our opinion the removal of the DTC Boulevard slip ramp, as shown in Alternate 17, will add delay and impacts to the local roadway network and reduce access into the Denver Tech Center for both resident and business trips. We feel removal of the slip ramp would also have an indirect impact on businesses by eliminating the direct access from I-225."

Mr. John Sheldon
September 15, 2014
Page 2

The model used for the PEL study was sufficient for the large scale traffic analysis required for comparison purposes between the alternatives for the study, but it is not adequate to analyze the specific impacts to the local network at the scale desired by the local agencies. Although there may be some added delays to the local roadway network, this level of analysis was not conducted as part of this process and could be included in NEPA during the next steps if Alternative 17 were to be further evaluated.

The term "not recommended" was used for Alternative Concept 17 because this concept meets the purpose and need for the project, and the potential impacts identified, including the potential additional delay due to closure of the slip ramp and the indirect impact on businesses, do not equal a magnitude of negative impacts that would warrant elimination of this alternative from future consideration. CDOT identified Alternative Concept 19 as the Recommended Alternative Concept for the southbound I-225 (Yosemite Street to I-25) project, taking into consideration the input from local agencies.

We thank you for your time in providing us with your comments on this important study.

Sincerely,



Rich Horstmann, P.E.
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