

COLORADO DEPARTMENT OF TRANSPORTATION REEVALUATION FORM	Original NEPA Approval Date: March 2008 (EA and Section 4(f)) and November 2008 (FONSI)	Reevaluation Date: September 2022	Project Code: STU M320-127 Subaccount: 23373
<p>Project Name and Location: I-25 and Broadway Interchange Reconstruction – Segment 3, Phase 2 + Segment 4 – Broadway, Ohio, and Wedge Ramp Reevaluation</p> <p>An Environmental Assessment (EA) and Finding of No Significant Impact (FONSI) were completed in 2008 for numerous proposed improvements to South Broadway from Arizona Avenue to Exposition Avenue, including modification of the I-25 interchange. Figure 1 depicts the 2008 EA/FONSI project segments.</p> <p>The project is located near the interchange of Interstate 25 (I-25) and South Broadway (I-25 milepost 207) in the City and County of Denver. Primary improvements will occur along South (S) Broadway, S Lincoln Street (St), and East (E) Ohio Avenue (Ave) (Figure 2). This is considered to be the final segment of the I-25 and Broadway design improvements.</p>			
<p>NEPA Document Title:</p> <ul style="list-style-type: none"> • South Broadway Environmental Assessment and Section 4(f) Evaluation; March 2008 • South Broadway Finding of No Significant Impact: November 2008 <p>https://denvergov.org/files/assets/public/dot/documents/projects/s-broadway-i-25/web_south-broadway-final-ea_mar08_eaonly.pdf</p> <p>https://www.denvergov.org/content/dam/denvergov/Portals/479/documents/South%20Broadway%20Finding%20of%20No%20Significant%20Impact.pdf</p>			
<p>Region/Program/Residency: Region I Local Agency</p>			
<p>Project Description:</p> <p>The more substantive improvements in the EA/FONSI, in summary, were:</p> <ul style="list-style-type: none"> • Reconstruct S Broadway south of I-25 to an 8-lane cross-section (initially configured as six lanes with two parking lanes until the additional driving lanes are needed). • Reconstruct E Mississippi Ave, E Ohio Ave, and E Exposition Ave within the study area. • Improve the I-25/Broadway interchange to include a new “wedge” ramp from southbound S Broadway over S Broadway to southbound I-25. • Modify the intersection of E Ohio Ave/I-25 ramps. • Realign the E Kentucky Ave/S Broadway intersection north to eliminate an existing intersection/signal. • Extend E Exposition Ave to the west (which will become W Exposition Ave) as a new north entrance to the I-25 and Broadway Station. • The RTD entrance/access road, S Bannock St, will be extended from W Exposition Ave, rather than extending S Acoma St as depicted in the EA (Figures 1 and 2). • Add new parking west of S Broadway and north of I-25 near the I-25 and Broadway Station. • Numerous infrastructure improvements, such as traffic control upgrades, water quality treatment, and drainage. • Improvements to enhance transit, bicycle, and pedestrian facilities, such as trail connections, pedestrian median refuges, and wider sidewalks. 			

Figure 1. I-25 and Broadway Interchange Reconstruction Segment Map

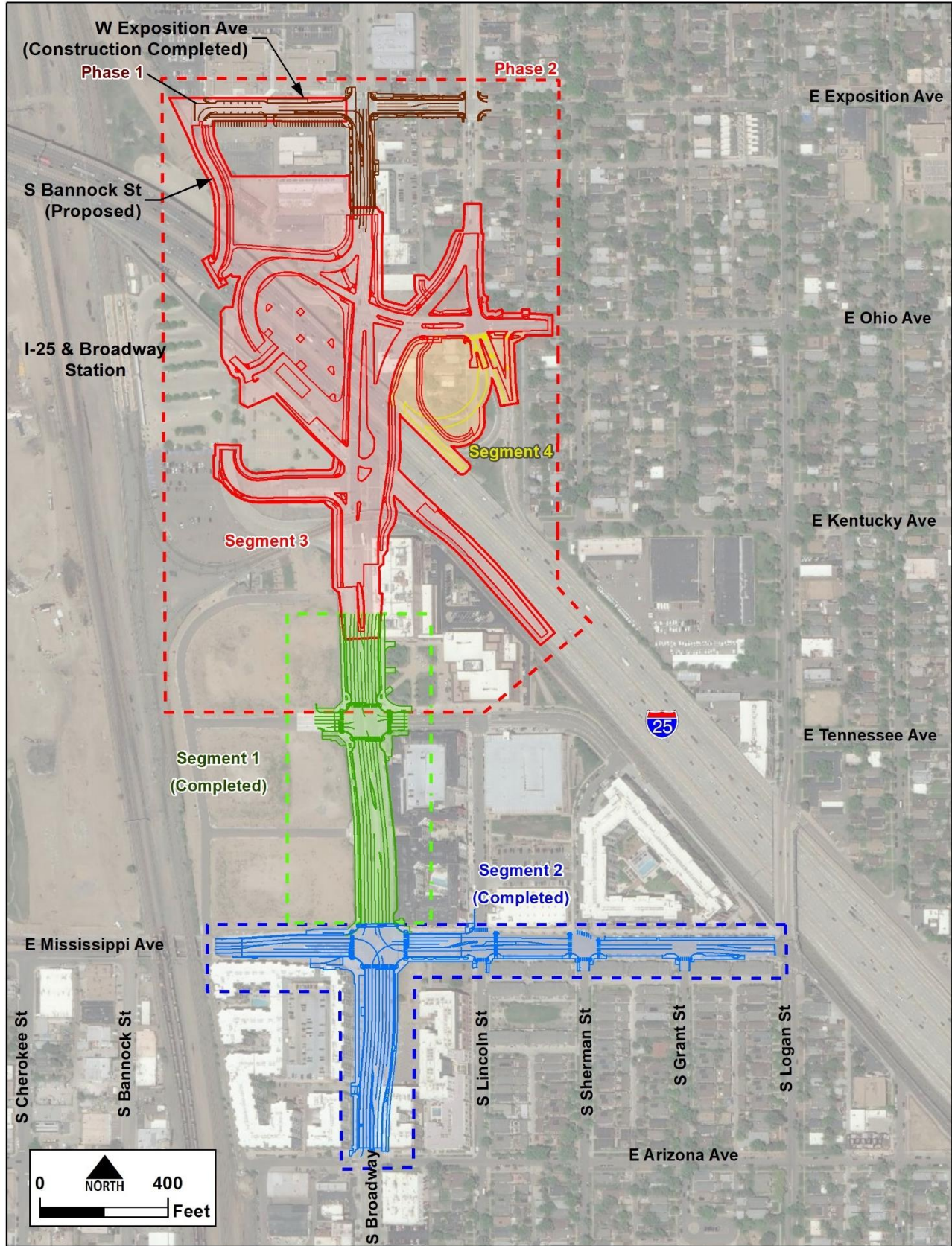
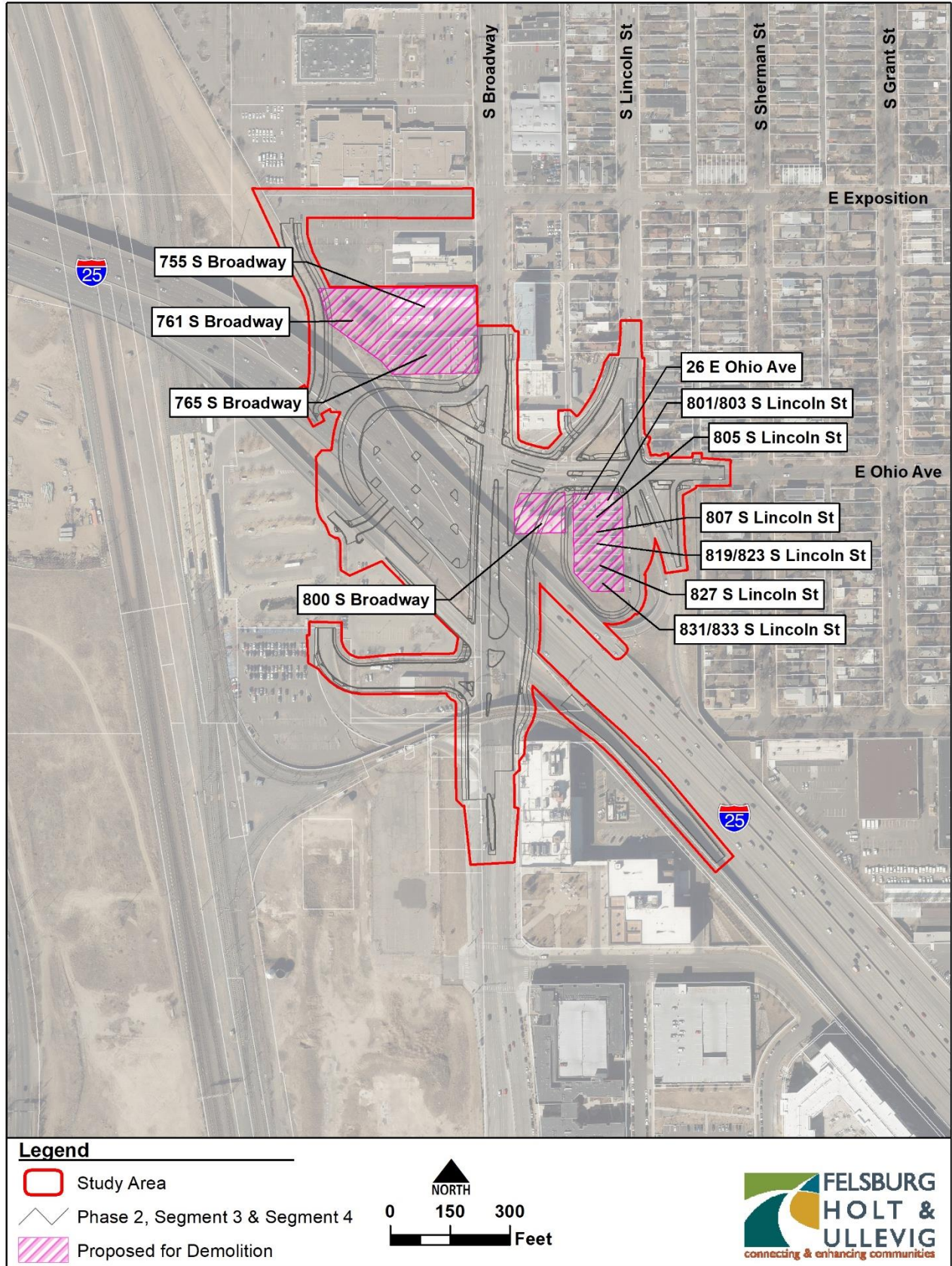


Figure 2. Study Area and Segment 3, Phase 2 + Segment 4 Proposed Action



Project Phasing Plan and Portions Completed (if warranted):

Due to funding constraints, the entire Preferred Alternative identified in the 2008 EA/FONSI was not built as a single action and improvements have occurred in phases, based on prioritization and availability of funds. Segmenting was developed with sensitivity to independent utility and logical termini to the extent that each segment provides a functional transportation system even in the absence of the other segments.

Table I. Project Segments and Construction Dates

Project Segment	Construction Completed
Segment 1	2017
Segment 2	2017
Segment 3, Phase 1	2021
Segment 3, Phase 2	Has not commenced, anticipated Fall 2022
Segment 4	Has not commenced

Segment 1:

- Constructed intersection improvements, including a new traffic signal and Intelligent Transportation System (ITS) equipment, at S Broadway and E Tennessee Ave.
- Widened northbound and southbound S Broadway (from E Mississippi Ave to E Kentucky Ave) to three through lanes with a parking lane that can be converted to a through lane in the future.
- Constructed additional multiuse trails along the east and west sides of S Broadway from E Kentucky Ave south to E Mississippi Ave.

Segment 2:

- Constructed intersection improvements, including a new traffic signal and ITS equipment, at S Broadway and E Mississippi Ave.
- Widened E and West (W) Mississippi Ave from E Lincoln St to the Consolidated Mainline Railroad.
- Widened eastbound E Mississippi from S Lincoln St to S Sherman St and reconstructed curb and gutter on the south side of E Mississippi Ave from S Sherman St to Logan St.
- Constructed a second left-hand turn lane in all directions at S Broadway and E Mississippi Ave.
- Widened northbound and southbound S Broadway (from E Arizona Ave to E Mississippi Ave).
- Constructed additional multiuse trails along the north side of W Mississippi Ave from S Broadway to the Consolidated Mainline Railroad and extended the multiuse trail on the north side of E Mississippi Ave from S Broadway to S Sherman St.

Segments 1 and 2:

- Upgraded sidewalks to be compliant with the Americans with Disabilities Act (ADA) and added an amenity zone on the sidewalks along S Broadway with landscaping and pedestrian lighting.
- Upgraded roadway lighting.
- Upgraded the storm sewer system.

Segment 3, Phase 1:

- Widened the two-lane E Exposition Ave between S Lincoln St and S Broadway within the existing 80-foot-wide right-of-way (ROW) width to 63-foot-wide, providing one lane in each direction with pedestrian/bicycle improvements, a shared through lane/left turn lane at S Broadway and a dedicated eastbound to northbound left turn lane at S Lincoln St. This involved impacts to street-facing yards, which were partially within the existing typical 80-foot ROW width. No additional ROW was acquired for these improvements.
- Provided a 63-foot-wide roadway cross-section for E Exposition Ave that includes (from north to south) the following:

- an approximate 5-foot-wide sidewalk,
 - a 5-foot-wide tree lawn,
 - a 2.5-foot-wide curb and gutter,
 - one 10-foot-wide travel lane,
 - one 10-foot-wide center turn lane,
 - one 11-foot-wide travel lane,
 - one 7-foot-wide parking lane,
 - a 2.5-foot-wide curb and gutter,
 - a 5-foot-wide tree lawn, and
 - a 5-foot-wide sidewalk.
- Upgraded both sidewalks with ADA curb ramps at the S Broadway and S Lincoln St intersections per CCD standards. Landscaping in residential yards beyond the south edge of the existing sidewalk on the north side of E Exposition Ave was not impacted. The existing north side sidewalk and adjacent retaining walls, where present, at back side of sidewalk will remain in place, except where sidewalk repairs, tie-ins, curb returns at intersections, and ADA improvements are required.
 - Constructed an extension of Exposition Ave west from S Broadway, which dead-ended approximately 485 feet from S Broadway.
 - Widened the S Broadway east and west sidewalks from E Exposition Ave to approximately 325 feet to the south of E Exposition Ave.
 - Added traffic signals to the E Exposition Ave and S Broadway intersection and the E Exposition Ave and S Lincoln St intersection.
 - Added Streetside Stormwater Planters at select locations within the sidewalk along the east and west sides of S Broadway, as well as the south side of W Exposition Ave. These planters were considered to be permanent water-quality features for the project.

Segment 3, Phase 2:

- Relocate and reconstruct the on-ramp connecting southbound and northbound S Broadway to southbound I-25 (the Wedge Ramp).
- Widen the end of the southbound off-ramp to provide an auxiliary right turn lane.
- Widen or reconstruct southbound S Broadway between just south of E Exposition Ave to north of E Tennessee Ave.
- Construct the roadway connection (S Bannock St) from W Exposition Ave to the RTD Broadway Station.
- Reconfigure the southbound S Broadway and E Ohio Ave intersection.
- Combine the existing S Broadway and E Kentucky Ave intersection and the S Broadway and southbound I-25 intersections, which would eliminate a signalized intersection and improve traffic operations.
- Remove and replace traffic signals at the southbound and northbound S Broadway intersections, E Ohio Ave intersections, and add a new signal at the S Lincoln St and E Ohio Ave intersections.
- Construct a paved parking lot within the interior of the Wedge Ramp.
- Modify the existing signal at S Walsh St and S Lincoln St.
- Modify the S Lincoln St and E Ohio Ave intersection.
- Construct lighting improvements.
- Construct storm sewer improvements.
- Construct water quality improvement features.
- Incorporate landscape and streetscape features

Segment 4:

- Realign the northbound I-25 On-ramp.
- Partially reconstruct the I-25 Off-ramp
- Upsize the S Broadway sewer trunk line from E Ohio Ave to E Center Ave.
- Construct the “loop ramp” pond to provide water quality.
- Construct streetside stormwater planters as permanent water quality features.
- Extend W Exposition Ave to go straight west to the Consolidated Mainline Railroad.
- Extend the RTD access road, S Bannock St, from W Exposition Ave, rather than extending S Acoma St.
- Adjust the planned parking expansion to fit with the other proposed changes and minimize property acquisitions.
- Realign W Kentucky Ave into the Broadway Station.
- Add a paved parking lot in the interior of the Wedge Ramp.

Portion of Project Currently Being Advanced:

Segment 3, Phase 2 + Segment 4 as described above.

Date(s) of Prior Reevaluations:**October 30, 2013**

The 2013 Reevaluation was for project Segments 1 and 2 (**Figure 1**). The 2013 Reevaluation addressed minor changes in final design prior to construction of Segments 1 and 2, which has been completed. Future project segments were described in the 2013 Reevaluation but were excluded from that action.

November 15, 2018 (Revised March 18, 2019)

The 2018-19 Reevaluation was solely for ROW acquisition for Segment 3 of the project (**Figure 1**). Minor changes in the project design caused changes in the ROW needs from those described in the EA and FONSI. Thirteen acquisitions were identified and addressed. Construction, including structure demolition, of Segment 3 was covered but prohibited.

December 17, 2019

This Reevaluation covered Segment 3, Phase I of the project. The final design of Segment 3, including Phase 2, was not included in the Reevaluation.

August 18, 2021

An EA Reevaluation was completed for the demolition of four structures:

- 755 S Broadway
- 761 S Broadway
- 765 S Broadway
- 800 S Broadway

December 14, 2021

This EA ROW Reevaluation was completed to commence ROW acquisition needed for future construction of Segment 3 of the Proposed Action.

I. Document Type

- Non-programmatic Categorical Exclusion (CE)
- Environmental Assessment (EA)
- Finding of No Significant Impacts (FONSI)

- Draft Environmental Impact Statement (DEIS)
- Final Environmental Impact Statement (FEIS)
- Supplemental Environmental Impact Statement (SEIS)
- Record of Decision (ROD)
- Other (such as: local funding, etc.)

This reevaluation represents document types of Environmental Assessment (EA) and Finding of No Significant Impacts (FONSI).

II. Reason for Reevaluation

- Project is proceeding to the next major approval or action [23 CFR 771.129(c)]
- Project changes such as laws, policies, guidelines; design; environmental setting, impacts, or mitigation

In August 2019 (and revised in September 2020), CDOT built on FHWA's February 2019 *Guidelines for the Visual Impact Assessment of Highway Projects* issued in February 2015. The visual assessment has been completed in accordance with the CDOT guidelines.

In August 2019, CDOT released their *Air Quality Project-Level Analysis Guidance* to provide basic information and standards for preparing an air quality analysis for CDOT. An air quality assessment was completed in accordance with these guidelines.

- Greater than three years have elapsed since FHWA's approval of the DEIS [23 CFR 771.129(a)] or FHWA's last major approval action for the FEIS [23 CFR 771.129(b)]
- Other:

This reevaluation is due to two reasons: the project proceeding to the next major approval or action and project changes such as laws/policies/guidelines; design; environmental setting/impacts/mitigation.

III. Evaluation

- Level 1: Less than three years since last major step to advance the action (e.g. approval of NEPA document, authority to undertake final design, authority to acquire significant portion of ROW, approval of PS&E) and there are no changes in project scope, environmental conditions, environmental impacts or regulations and guidelines. All decisions in the prior NEPA document remain valid. No FHWA concurrence is required. Note to file and to distribution below.
- Level 2: There are only minor changes in the project scope and/or updates or explanation needed for one or more resource areas. FHWA concurrence is required.
- Level 3: Major changes in project scope or environmental commitments, or for EIS's when greater than three years have elapsed since the last major project action. Updates or new studies maybe required. A Level 4 Reevaluation may require a separate document. FHWA concurrence is required.

This reevaluation is a Level 2, where there are only minor changes in project scope and/or updates or explanation needed for one or more resource areas.

ENVIRONMENTAL SETTING AND ENVIRONMENTAL IMPACT ASSESSMENT:

Document changes to human, socio economic, or natural environment for environmental setting or circumstances. Document changes in impact status. Place checkmark or description where relevant.

Setting / Resource / Circumstance	Change in Affected Environment or Setting		Change in Environmental Impact		Date Reviewed	Highlight Additional Studies Required or Attachments
	Yes	No	Yes	No		
Air Quality	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	April 2022	See Impacts Assessment Section and Attachment 1.
Geological Resources and Soils	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	August 2020	No change in environmental conditions or impacts.
Water Quality	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	August 2020	See Impacts Assessment Section.
Floodplains	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	August 2020	No change in environmental conditions or impacts.
Wetlands/Waters of U.S.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	August 2020	No change in environmental conditions or impacts.
Vegetation and Noxious Weeds	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	December 2020	See Impacts Assessment Section and Attachment 2.
Fish and Wildlife	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	August 2020	No change in environmental conditions or impacts.
Threatened / Endangered Species	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	August 2020	No change in environmental conditions or impacts.
Historic Resources	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	December 2020	See Impacts Assessment Section and Attachment 3.
Archaeological Resources	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	August 2020	No change in environmental conditions or impacts.
Paleontological Resources	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	August 2020	No change in environmental conditions or impacts.
Land Use	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	April 2022	See Impacts Assessment Section and Attachment 4.
Social Resources	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	April 2022	See Impacts Assessment Section and Attachment 4.
Economic Resources	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	April 2022	See Impacts Assessment Section and Attachment 4.

Environmental Justice	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	April 2022	See Impacts Assessment Section and Attachment 5.
Right-of-Way Impacts	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	July 2022	See Impacts Assessment Section.
Transportation Resources (e.g., roadway, rail, bus, bike, pedestrian, etc.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	April 2022	See Impacts Assessment Section and Attachment 6.
Utilities and Railroads	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	August 2020	No change in environmental conditions or impacts.
Historic Section 4(f)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	August 2020	See Impacts Assessment Section and Attachment 3.
Section 6(f)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	August 2020	Not applicable.
Farmlands	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	August 2020	Not applicable.
Noise	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	August 2020	See Impacts Assessment Section.
Visual Resources/ Aesthetics	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	April 2022	See Impacts Assessment Section and Attachment 7.
Hazardous Materials	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	April 2022	See Impacts Assessment Section and Attachments 8 and 9.
Cumulative Impacts	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	April 2022	See Impacts Assessment Section and Attachment 10.
Other(s) (e.g., Non-Historic Section 4(f), Parks & Recreation, Energy)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	December 2020	Not applicable.

DESIGN ALTERATIONS:

Document changes to project scope and/or design criteria:

This description does not include the completed Segments 1 and 2 and/or Segment 3, Phase I (**Figure 2**).

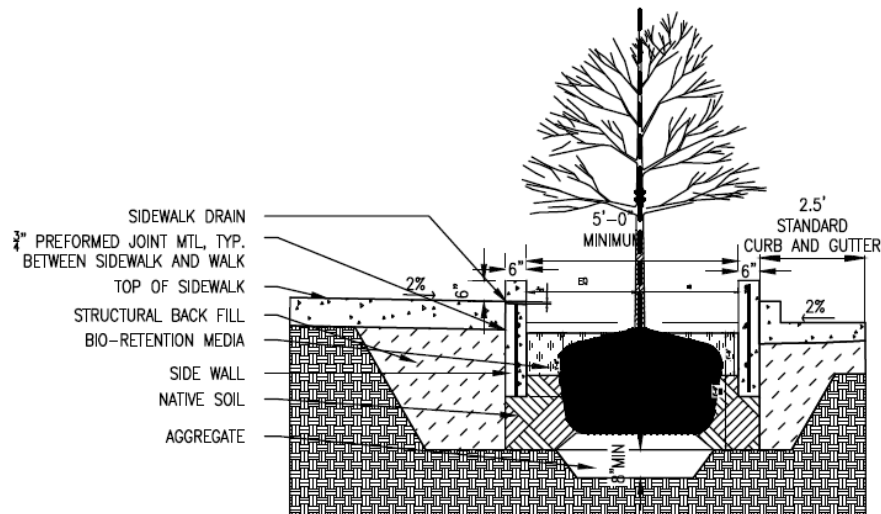
Changes to the current Proposed Action from the 2008 EA/FONSI Preferred Alternative include the following:

- The relocation of a water quality pond to the area of the loop ramp.
- The addition of streetside stormwater planters as permanent water quality features.
- The slightly adjusted alignment of the wedge ramp to better fit into the available space.
- The planned extension of W Exposition Ave to go straight west to the Consolidated Mainline Railroad.
- The extension of the RTD access road, S Bannock St, from W Exposition Ave, rather than extending S Acoma St, as depicted in the EA (**Figures 1 and 2**).
- The adjustment of the planned parking expansion to fit with the other proposed changes and minimize property acquisitions.
- The realignment of W Kentucky Ave into the Broadway Station.
- The inclusion of a paved parking lot in the interior of the Wedge Ramp.
- The partially reconstructed I-25 Off-ramp to provide three approach lanes to accommodate increases in forecasted traffic volumes compared to the 2008 EA.

Water Quality Features

During preparation of the 2008 EA/FONSI, a permanent water quality pond located to the north of I-25 and to the west of southbound S Broadway was proposed as part of the design. However, this water quality feature has been relocated to the area of the loop ramp. If additional area is needed for water quality, streetside stormwater planters will be installed with selected trees identified for planting (**Figure 3**).

Figure 3. Proposed Streetside Stormwater Planters, if needed



STORMWATER STREETSIDE PLANTER – SECTION VIEW

Economic Resources

The W Exposition Ave alignment resulted in the removal of public parking spaces used by private businesses, Merchants Park Shopping Center and Kitchens on Broadway, located at 685 and 725 S Broadway, respectively. Parking will be added within the northern portion of the study area, currently developed

with three vacant buildings, 761, 755, and 765 S Broadway, that will be demolished and used for parking areas.

Transportation Resources (roadway, rail, bus, bike, pedestrian, etc.)

The 2008 EA/FONSI assumed that a three-story parking structure would be constructed north of I-25, west of S Broadway, and east of S Bannock St (referred to as Acoma St in the 2008 EA/FONSI). This parking structure will not be constructed at this time; however, surface parking will be constructed as described previously.

Pedestrian enhancements planned as part of the 2008 EA/FONSI Preferred Alternative included a minimum of 13.5-foot sidewalks (including an amenity zone) along all roadways constructed. Changes regarding pedestrian enhancements include a reduction in sidewalk width from 13.5 feet to 10 feet. The reduction in sidewalk widths from 13.5 feet to 10 feet preserves commercial and future residential ROW.

REGULATORY CHANGES:

Document changes to laws, regulations, and/or guidelines:

The following changes in laws, regulations, and/or guidelines may be relevant to this Reevaluation:

- October 2020: CDOT Noise Analysis and Abatement Guidelines
- September 2020: 2019 CDOT Visual Impact Assessment Guidelines (dated August 30, 2019, revised September 25, 2020); the guidance built on the FHWA *Guidelines for the Visual Impact Assessment of Highway Projects* (dated 2015)
- March 2020: CDOT National Environmental Policy Act (NEPA) Manual
- 2020: New National Ambient Air Quality Standards (NAAQS)
- 2020: Designation of ozone non-attainment area in the Denver metropolitan area
- February 2019: CDOT Air Quality Project-Level Analysis Guidance
- 2016: FHWA guidance on mobile source air toxics and greenhouse gas analysis
- 2016: Colorado Hazardous Waste Regulations amended
- 2014: Programmatic Agreement (PA) between SHPO, FHWA, and CDOT
- 2013: US Environmental Protection Agency project level conformity guidance
- 2013: ASTM E 1527-13 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process
- 2012: FHWA Order 6640.23A for Environmental Justice

IMPACTS ASSESSMENT:

For items checked as changed above: assess the affected natural and socio-economic environment, impacts and new issues/concerns which may now exist:

For the 2008 EA/FONSI, based on the project description, agency scoping, field investigation, and evaluation, the following resources were not present in the study area and/or had no impacts. Therefore, these resources were also eliminated from further review during this Reevaluation.

- Floodplains
- Wetlands/Waters of U.S.
- Threatened/Endangered Species
- Farmlands
- Parks and Recreation

Resources that have not experienced a change in affected environment or setting and/or a change in environmental impacts since the 2008 EA/FONSI may still have relevant mitigation that is required. Resources include the following:

- Fish and Wildlife
- Paleontological Resources
- Archaeological Resources

For resources where the affected environment has changed since reporting in the 2008 EA/FONSI or where anticipated environmental impacts are now different, the key findings of this EA Reevaluation are summarized in the following paragraphs.

Air Quality

While no air quality impacts were expected from the full Preferred Alternative in the 2008 EA/FONSI, an air quality technical analysis was completed for Segment 3, Phase 2 + Segment 4. It was concluded that there is no change in the findings between the 2008 EA/FONSI and this EA Reevaluation as, in general, local conditions for air quality remain consistent between the 2008 EA/FONSI and this EA Reevaluation. Some

National Ambient Air Quality Standards (NAAQS) and measuring times have been updated since 2008, but those updates would not change outcomes of the 2008 EA/FONSI decisions. Findings from the 2008 EA/FONSI remain valid for NAAQS and Conformity, Mobile Source Air Toxics, Greenhouse Gas Emissions, and Construction Impacts.

The Air Quality Technical Report is included in **Attachment I**.

Water Quality

The 2008 EA/FONSI stated that the impervious surface for the 2008 full Preferred Alternative would be increased by approximately 3.6 acres; however, with design refinements, the Proposed Action for this EA Reevaluation estimates that approximately one acre of impervious surface will be added within the study area. According to CCD standards, the area must implement water quality features.

During preparation of the 2008 EA/FONSI, a permanent water quality pond located to the north of I-25 and to the west of southbound S Broadway was proposed as part of the design. However, this water quality feature has been relocated to the area of the loop ramp. If additional area is needed for water quality, streetside stormwater planters (**Figure 3**) will be installed within selected upland trees replaced as part of the Proposed Action.

Vegetation and Noxious Weeds

The number of trees slated for removal was not specified during the 2008 EA/FONSI. Rather it was stated that a loss of mature landscaped trees such as silver maple and crabapple within the ROW will occur. Landscaped upland trees will be removed as a part of the project, and replacement trees will be planted as

a part of this EA Reevaluation's Proposed Action. Removal and replacement of upland trees within CCD's ROW will be in accordance with CCD's Tree Removal and Replacement Ordinance.

During the construction of Segment 3, Phase I, 29 trees were removed, four less than the 33 trees specified in the design. Therefore, 29 upland trees needed for 1:1 replacement will be planted as part of this Reevaluation.

The Biological Technical Report is included in **Attachment 2**.

Historic Resources

The Section 106 Area of Potential Effects (APE) identified during the 2008 EA/FONSI included parcels that fronted S Broadway from E Exposition Ave to E Arizona Ave.

The Proposed Action for this EA Reevaluation involves the area between E Exposition Ave and E Tennessee Ave, and from S Lincoln St on the east to S Bannock St on the west. The APE includes properties that may be subject to direct and indirect effects by the Proposed Action, including the area where permanent and temporary easements and ROW purchases are anticipated. In addition, areas needed for construction, mobilization, and drainage improvements are included within the APE.

The revised APE for Segment 3, Phase 2 + Segment 4 extends partially outside the original APE. The revised APE was extended to include the residential properties that front S Lincoln St between E Exposition Ave and E Ohio Ave.

The APE follows existing ROW and legal parcel lines and includes all previously surveyed resources adjacent to the Proposed Action, as well as all properties containing buildings and structures that meet the minimum age requirement of 50 years for potential National Register of Historic Places (NRHP) eligibility. For purposes of this project, a 45-year age threshold was used when evaluating potentially historic properties to account for the extended project schedule associated with this Reevaluation. For this reevaluation, intensive-level surveys were conducted for nineteen (19) properties within the Segment 3, Phase 2 + Segment 4 APE.

No properties within the APE have been listed on the National or State Registers of Historic Places (NRHP/SRHP). However, two subsurface linear resources and one historic district located within the APE were treated as NRHP eligible since it was beyond the scope of this project to reevaluate them. These properties, including determinations of effect, are listed below.

- Brick Sewer Under Broadway north of Mississippi Ave – 0.7 mile section under S Broadway from E Dakota Ave to E Ohio Ave – part of the Denver Brick Sewer System (*no adverse effect*)
- 5DV.6959, West Washington Park (WWP) Historic District (*no adverse effect*)
- 5DV.9217.3 Denver Tramway (*adverse effect*)

Broadway Brick Storm Sewer Segment – Previously prepared, an existing February 13, 2013 PA among the FHWA, SHPO, and CDOT addressed future project impacts to the National Register eligible brick-lined sewers in Denver. The PA requires that CDOT, acting on behalf of FHWA, shall write a letter to SHPO and the consulting parties including documentation of the proposed project and the intention to invoke the PA to fulfill FHWA's responsibilities under Section 106. However, at this time, CDOT will not be invoking the PA due to the lack of impacts to the Denver brick sewer line.

Proposed improvements are not anticipated to impact the brick sewer line under S Broadway as part of the project. As such, CDOT has determined that the Segment 3, Phase 2 + Segment 4 project will have a **no adverse effect** on the Denver brick sewer line, an NRHP eligible resource.

5DV.6959 WWP Historic District: Proposed improvements within the W Washington Park Historic District include creating a smoother transition between northbound S Broadway and S Lincoln St by widening the existing divergence between the two roads at E Ohio Ave, relocating and reconstructing the I-25 on and off-ramp connections to E Ohio Ave and S Lincoln St, associated traffic signals, storm water improvements, and landscape and streetscape improvements.

In summary, it was also determined that the Segment 3, Phase 2 + Segment 4 proposed improvements would result in **no adverse effect** regarding the WWP Historic District (5DV.6959), including the following properties located along S Lincoln St:

- (5DV.6236) 794 S Lincoln St
- (5DV.6235) 782 S Lincoln St
- (5DV.6234) 776 S Lincoln St
- (5DV.6233) 772 S Lincoln St
- (5DV.6230) 746-750 S Lincoln St
- (5DV.6227) 736 S Lincoln St
- (5DV.6225) 734 S Lincoln St
- (5DV.6226) 735 S Lincoln St
- (5DV.6172) 741-745 S Lincoln St
- (5DV.2934) 749 S Lincoln St

CDOT has determined that the Segment 3, Phase 2 + Segment 4 proposed improvements would result in an **adverse effect** regarding the following NRHP eligible linear property:

- **5DV.9217.3 Denver Tramway:** Trolley lines ran along S Broadway through the APE and are assumed NRHP *eligible*. The tracks may have already been removed from under S Broadway north of I-25 and south of E Exposition Ave, but no clear documentation has been found. As such, CDOT has determined that the project will have an **adverse effect** on the NRHP eligible Denver Tramway trolley line. A 2007 MOA (updated in 2013) among the FHWA, SHPO, CDOT, and CCD was prepared to address treatment, mitigation, coordination, and review regarding the Denver Tramway trolley line on S Broadway.

The 2013 Denver Tramway trolley MOA included several specific stipulations:

- *Stipulation 2a.* requires archival documentation of any trolley tracks encountered in projects along S Broadway.
- *Stipulation 2.a.i.* states that “interpretive mitigation shall be prepared that describes the relationship of the trolley tracks to the street, businesses, and nearby neighborhoods.”
- *Stipulation 2.a.ii* states that “other creative mitigation options that arise in the process of the projects that further the education or understanding of the importance of the resource shall also be considered according to project circumstances but are not required under the terms of this Agreement.”

The existing MOA was amended to extend the expiration date for an additional five years, until February 6, 2028, which will allow time for the construction of Segment 3, Phase 2 + Segment 4 improvements.

The 2013 Denver Tramway trolley MOA required that CDOT, acting on behalf of FHWA, write a letter to SHPO and consulting parties and include documentation of the proposed project and the intention to invoke this Agreement to fulfill FHWA's responsibilities under Section 106. Signatories to the amendment included SHPO, FHWA, CDOT, and CCD. Currently, CDOT is invoking the MOA.

Amendments to the Denver Tramway MOA were signed by Denver Landmarks Preservation Commission, the SHPO, CDOT, and FHWA between March 17 and 29, 2022. The signed amendment was transmitted to the Advisory Council on Historic Preservation on April 7, 2022, completing all FHWA requirements to execute MOA Amendment No. 1 to the Denver Tramway Trolley on Broadway MOA.

CDOT and CCD have developed concepts for the interpretive mitigation component of the project, which will be constructed as part of Segment 3, Phase 2 + Segment 4, and were included in the MOA amendment.

The 2022 Denver Tramway trolley MOA included additional stipulations:

- *Stipulation IA.* The interpretative trolley trail concept depicted in Appendix Two of the 2013 Agreement entitled “Historic Mitigation Concept: South Broadway Arizona to Exposition and I-25 Interchange Conceptual Design” is replaced in entirety with a new interpretative mitigation concept entitled “I-25 + Broadway Historic Mitigation” dated December 2021. The mitigation concept is included in **Attachment 3: Historic Documentation**.
- *Stipulation IB.* Stipulation 11, Duration, of the Agreement remains unchanged, except this Amendment will allow an additional five years to complete the Projects and the Agreement Stipulations, providing a revised termination date of February 6, 2028. This timeframe can be extended if agreed to in writing by the signatories prior to the expiration date.

Additionally, notes will be added in the construction drawings and specifications to ensure this stipulation is met as part of the Segment 3, Phase 2 + Segment 4 Project. Language will be included into the plans and specifications for the Segment 3, Phase 2 + Segment 4 Project directing construction to halt in the event of a discovery and for the CDOT Historian to be contacted immediately.

One commercial property within the Segment 3, Phase 2 + Segment 4 APE was also determined to be eligible to the NRHP and will result in an effect determination of **no adverse effect**:

- (5DV.16751) 900 S Broadway

Additionally, the Segment 3, Phase 2 + Segment 4 APE was found to contain nineteen (19) properties that do not meet the NRHP eligibility criteria for historic significance. Effects determinations for the following properties would result in *no historic properties affected*:

- (5DV.48) Gates Rubber Co. Historic District
- (5DV.9955) 800 S Broadway
- (5DV.6240) 831-833 S Lincoln St
- (5DV.6174) 827 S Lincoln St
- (5DV.6239) 819-823 S Lincoln St
- (5DV.6238) 807 S Lincoln St
- (5DV.6173) 805 S Lincoln St
- (5DV.6237) 801-803 S Lincoln St
- (5DV.9003) 755 S Broadway
- (5DV.16803) 765 S Broadway
- (5DV.16721) 761 S Broadway
- (5DV.6232) 768 S Lincoln St
- (5DV.6229) 742 S Lincoln St
- (5DV.6228) 738-740 S Lincoln St
- (5DV.6187) 754 S Broadway
- (5DV.16722) 770 S Broadway
- (5DV.6188) 788 S Broadway
- (5DV.6186) 725 S Broadway
- (5DV.9002) 723 S Broadway

The Historic Resources Technical Report is included in **Attachment 3**.

A detailed summary of NRHP determinations of eligibility regarding the proposed project can be found in the attached Section 106 letter dated January 27, 2021. Due to comments received from other consulting parties, supplemental information was submitted to the SHPO on April 19, 2021; however, the NRHP eligibility determinations for the properties listed above remained unchanged from the January 27, 2021 submittal.

SHPO concurrence on NRHP determinations of eligibility was received on May 19, 2021. Subsequent correspondence with the SHPO for NRHP determinations of effects and conceptual historic mitigation was submitted on January 28, 2022, and SHPO concurrence was received on February 14, 2022.

In early June 2022, a design change included extending S Bannock St from W Exposition Ave rather than extending S Acoma St as depicted in the February 14, 2022 SHPO concurrence. However, during historic eligibility consultation in January and April 2021, this alternative was previously evaluated and included within the APE.

Prior to the January 2022 Effects determination, the APE was enlarged along W Exposition Ave to accommodate a change in the proposed connection between W Exposition Ave and the RTD light rail station. The proposed connection, formerly along S Bannock St, was shifted east and renamed S Acoma St. The enlarged APE contained properties both within and outside the original 2008 EA APE.

As previously stated, design modifications were necessary for the connection between W Exposition Ave and the RTD light rail station. The CDOT Historian reviewed the design change and determined that a southern transportation extension on either a S Bannock St or a S Acoma St alignment was included in the 2019 and 2021 EA reevaluations. Furthermore, the properties directly affected by a possible southern extension between the extended W Exposition Ave to RTD consist of either vacant parking lots or properties previously determined not eligible. Finally, the proposed S Bannock St extension is consistent with prior and recent Section 106 coordination related to this project.

Additionally, two overhead electrical lines will require temporary easements from a property that was not included in the previously evaluated APE. However, the property is not considered to be age eligible for NRHP consideration. Furthermore, it is common to exclude properties from an APE if a temporary easement is required as the related activity is temporary in nature and has no potential to affect historic properties.

Thus, no additional coordination with the SHPO due to this design change was required. Copies of the letters and proposed mitigation are available in **Attachment 3**.

Section 4(f)

A Programmatic Net Benefit Section 4(f) was previously prepared for the Denver Tramway System (5DV.9271), including 5DV.9217.3 S Broadway line) as part of the 2008 EA/FONSI. This Net Benefit Section 4(f) would apply to any impacts to the Denver Tramway System on S Broadway by the Segment 3, Phase 2 + Segment 4 Project (**Attachment 3**).

Table 2. Updated Section 4(f) Use

Site Number	Name	Section 4(f) Use in FONSI	Section 4(f) Use in this Reevaluation
5DV.9721 (including 5DV.9217.3)	Denver Tramway Trolley Line (0.625 mile segment on S Broadway from E Exposition Ave to E Arizona Ave)	4(f) Programmatic Net Benefit	4(f) Programmatic Net Benefit from FONSI applies to this project – no change

Land Use, Social and Economic Resources

The Proposed Action is still compatible with existing and future land use, land use plans, and zoning. Residential, commercial, and industrial land uses would still be converted to a transportation use with some parcels being acquired and potential relocation of some businesses and residential properties. Proposed improvements would not induce substantial additional growth since substantial growth has been occurring and is expected to continue. Further, improved access and enhanced multimodal connectivity would support land uses within the study area.

Construction of the Proposed Action is not expected to affect population growth within or adjacent to the study area. Increased population and development in the study area, resulting from transit-oriented

development (TOD) around S Broadway, naturally will increase congestion as the population living and working in the area increases. Improvements associated with the Proposed Action would prevent congestion from reaching unacceptable levels as traffic continues to increase in the area. Further, the addition of pedestrian and bicycle facilities would improve multimodal travel options not currently accommodated with existing infrastructure.

During construction, temporary detours and related out-of-direction travel would impact residents and businesses throughout the study area.

Similar to the 2008 EA/FONSI, the Proposed Action remains consistent with economic growth plans for the area. Improvements, including enhancement of transit, pedestrian, and bicycle facilities, would improve access and mobility along this section of S Broadway.

As a result of the W Exposition Ave alignment, public parking spaces were removed. Additionally, a three-story parking structure, as described in the 2008 EA/FONSI, will not be constructed; however, parking will be available following the demolition of three commercial buildings located at 761, 755, and 765 S Broadway.

The Land Use, Social and Economic Resources Technical Report is included in **Attachment 4**.

Environmental Justice

Low-income populations were not identified with the 2008 EA/FONSI. During this Reevaluation, one Block Group (Census Tract 21.02: Block Group 4) was below the Denver County percentage of low-income households, but equal to the Colorado state percentage.

One minority population was identified during the 2008 EA/FONSI. This census tract was located to the north of E Ohio Ave and to the east of S Broadway.

Three minority populations were identified during this Reevaluation: Census Tract 29.01, Block Group 2; Census Tract 29.01, Block Group 3; and Census Tract 21.02, Block Group 4. During this Reevaluation, it was concluded that Census Tract 21.02, Block Group 4, surpassed the state and county levels as a minority population. The residential area of the identified minority EJ population in Census Tract 21.02, Block Group 4 is located approximately 0.4 miles northwest of the study area and will not be disproportionately or adversely impacted by the Project. Furthermore, when reviewing aerial photographs of Census Tract 21.02, Block Group 4, residential development is limited as Census Tract 21.02, Block Group 4 is primarily commercial or is under development as well as a transportation corridor (e.g., light rail system).

Limited English Proficiency (LEP) was not evaluated in the 2008 EA/FONSI. According to the 2018 ACS 5-year estimates, Colorado has an LEP population of 2.8 percent while Denver County is higher at 4.8 percent. Both reviewed census tracts within the study area were lower than both Colorado and Denver County percentages. Thus, neither of the census tracts within the study area was considered to be LEP populations.

All populations, regardless of demographics, will benefit from reduced congestion and more reliable travel times as a result of the Project. The I-25 and South Broadway interchange improvements will accommodate multimodal connections and increasing traffic demands, as well as improve traveler safety and operational efficiency. As such, the impacts from the Project's improvements to the identified low-income and minority populations are not considered to be disproportionate. The effects of the South Broadway Interchange Reconstruction improvements will impact EJ populations during construction; however, the mitigation measures and benefits of the Project will offset the impacts to the low-income and minority populations.

The Environmental Justice Technical Report is included in **Attachment 5**.

Residential/Business Right-of-Way Impacts

During the November 2018 ROW Reevaluation, the March 2019 ROW Update, the December 2019 Reevaluation and the December 2021 ROW Reevaluation, Segment 3 ROW was evaluated to commence ROW acquisition needed for future construction of Segment 3 of the Proposed Action.

The 2008 EA/FONSI Preferred Alternative design reported 9.74 acres total from 22 properties for ROW.

The revised Segment 3 design was reviewed for the 2018-19 ROW Reevaluation, and the ROW needed for the revised Segment 3 was calculated to be an additional 1.27 acres, which brought the total amount of ROW to 11.01 acres. The revised design reviewed for the 2018-19 ROW Reevaluation included an extension of W Exposition Ave to the west and terminating at the future S Bannock St. The future S Bannock St would link W Exposition Ave to the RTD light rail station as a southern connector. However, three parcels (referred to as Parcels 31 through 33) were either retained as RTD ROW or disposed and conveyed to CCD. The total area of those three parcels was 0.52 acres. Thus, the total amount of ROW was reduced to 10.49 acres.

Following the approval of the 2018-19 ROW Reevaluation and as part the December 2021 ROW Reevaluation, the proposed connection between W Exposition Ave and the RTD light rail station, which consisted of S Bannock St, was shifted east and renamed S Acoma St. As part of that design change, an additional 0.48 of ROW was required for ROW and temporary and permanent easements. The total amount of ROW was increased to 10.97 acres.

As previously stated under the section for Historic Resources impacts, design modifications were necessary to the connection between W Exposition Ave and the RTD light rail station. That connection to the RTD light rail station would be completed by the extension of S Bannock St rather than S Acoma St; removing the S Acoma St extension reduced the amount of ROW by 0.29 acres.

Since the extension of S Bannock St was included in the 2018–19 ROW Reevaluation, a majority of the ROW and temporary and permanent easements were previously approved; however, three temporary easements (referred to as Parcels 41 through 43), totaling 0.10 acres, will be required for the S Bannock St extension, which brought the total ROW up to 10.78 acres.

Finally, a portion of the commercial property located at 788/790 S Broadway (referred to as Parcel 14) will not be acquired, further reducing the ROW by 0.01 acre, and bringing the total to 10.77 acres.

Therefore, the additional amount of ROW when compared to the 2008 EA/FONSI Preferred Alternative design is 1.03 acres.

Note: The area to the southwest of the intersection of E Ohio Ave and S Lincoln St (referred to as Parcels 5 through 10 and Segment 4) will be a part of the I-25 Interchange loop ramp reconfiguration, and final design of this area will occur at a later date. These parcels have been included within the ROW impact evaluation.

See **Table 3** for the 2022 ROW and easement additions, as well as previous ROW acquisition actions.

Refer to the Form 1399 ROW Reevaluation completed in December 2021 for additional information.

Table 3. Summary of Project of Right-of-Way Acquisition Actions

Parcel Number (Figure 4)^a	Address	Acquisition Type	Acres to be Acquired (from 2008 EA/FONSI Preferred Alternative)
1	1100 to 1170 S Broadway*	Acquisition	0.29
2	1000 and 1050 S Broadway and 1099 S Logan St*	Acquisition	1.18
3	901 to 999 S Broadway*	Acquisition	0.75
4	887 S Broadway	Permanent Easement	0.10
5	831 & 833 S Lincoln St	Acquisition	0.11
6	827 S Lincoln St	Acquisition	0.12
7	823 S Lincoln St	Acquisition	0.06
8	819 S Lincoln St	Acquisition	0.05
9	807 S Lincoln St	Acquisition	0.10
10	805 S Lincoln St	Acquisition	0.07
11	26 E Ohio Ave	Acquisition	0.08
12	801/803 S Lincoln St *	Acquisition	0.05
13	800 S Broadway	Acquisition	0.29
14	788 S Broadway	Acquisition	0.01
15	765 S Broadway	Acquisition	0.85
16	761 S Broadway	Acquisition	0.45
17	801/875 S Broadway*	Acquisition and Permanent Easement	3.26
18	701 S Broadway	Acquisition	0.76
20	1125, 1195 S Broadway*	Acquisition	0.01
21	795 S Broadway	Acquisition	0.30
22	801 S Broadway	Acquisition and Permanent Easement	0.85
Property ROW Acquisition from the 2008 EA (acres)			9.74
Additional Property Acquisition from the 2018-19 ROW Reevaluation			
Parcel ID. (Figure 5 and 6)^a	Easement ID from plan sheet	Acquisition Type	Acres to be Acquired (2013 Reevaluation)
30 ^b	685/695 S Broadway	Acquisition	0.12
31 ^{b, c}	800 S Broadway	Acquisition ^c	0.26
32 ^{b, d}	888 S Broadway	Permanent Easement ^d	0.08
33 ^{b, d}	899 S Broadway	Permanent Easement ^d	0.18
34 ^b	755 S Broadway	Acquisition	0.63
Additional ROW Acquisition from the 2018 Reevaluation (acres)			1.27
Removed from ROW Acquisition			0.52
Proposed Additional Property Acquisition for the 2021 Reevaluation			
Parcel ID. (Figure 7)^a	Easement ID from plan sheet	Acquisition Type	Acres (square feet) to be Acquired (2021 Reevaluation)
35 ^a	Parcel-131 South C	Right of Way	0.04 (1,832)
36 ^{a, e}	Parcel-138	Right of Way	0.22 (9,522)

37 ^{a, e}	Temporary Construction Easement	Temporary Easement	0.01 (607)
38 ^{a, e}	10' Temporary Construction Easement	Temporary Easement	0.04 (1,829)
39 ^a	Parcel-131 South A	Right of Way	0.15 (6,511)
40 ^{a, e}	10' Temporary Construction Easement	Temporary Easement	0.02 (776) ^f
Proposed Additional ROW Acquisition for the 2021 ROW Reevaluation (acres)			0.48
Removed from ROW Acquisition due to the S Bannock St Design Change			0.29
Proposed Additional Property Acquisition for the 2022 Reevaluation			
Parcel ID (Figure 8)^a	Easement ID from plan sheet	Acquisition Type	Acres to be Acquired (2022 Reevaluation)
41 ^a	TCE-138W	Temporary Easement	0.02 (876)
42 ^a	TCE-131	Temporary Easement	0.04 (1,658)
43 ^a	TCE Parcel 138	Temporary Easement	0.04 (1,738)
Proposed Additional ROW Acquisition for the 2022 Reevaluation (acres)			0.10
<p>* Multiple addresses in a table cell signify common ownership, from the EA.</p> <p>^a For continuity, the parcel numbering from the EA (Figure 4), the 2018-19 ROW Reevaluation (Figures 5 and 6), the 2021 ROW Reevaluation (Figure 7), and the 2022 Reevaluation is shown in this column.</p> <p>^b The parcel was not identified or discussed in the EA and was numbered for a Reevaluation.</p> <p>^c The parcel was retained as RTD property; thus, was removed as part of ROW acquisition.</p> <p>^d The parcel was disposed and conveyed by CDOT to the City and County of Denver; thus, was removed as part of ROW acquisition.</p> <p>^e The parcel/easement was removed as part of design change.</p> <p>^f The parcel was erroneously listed as 0.20 acres in the 2021 ROW Reevaluation.</p>			

Figure 4. ROW Acquisition Figure from 2008 Environmental Assessment



Figure 5. ROW Acquisition Figure from 2018-19 Reevaluation

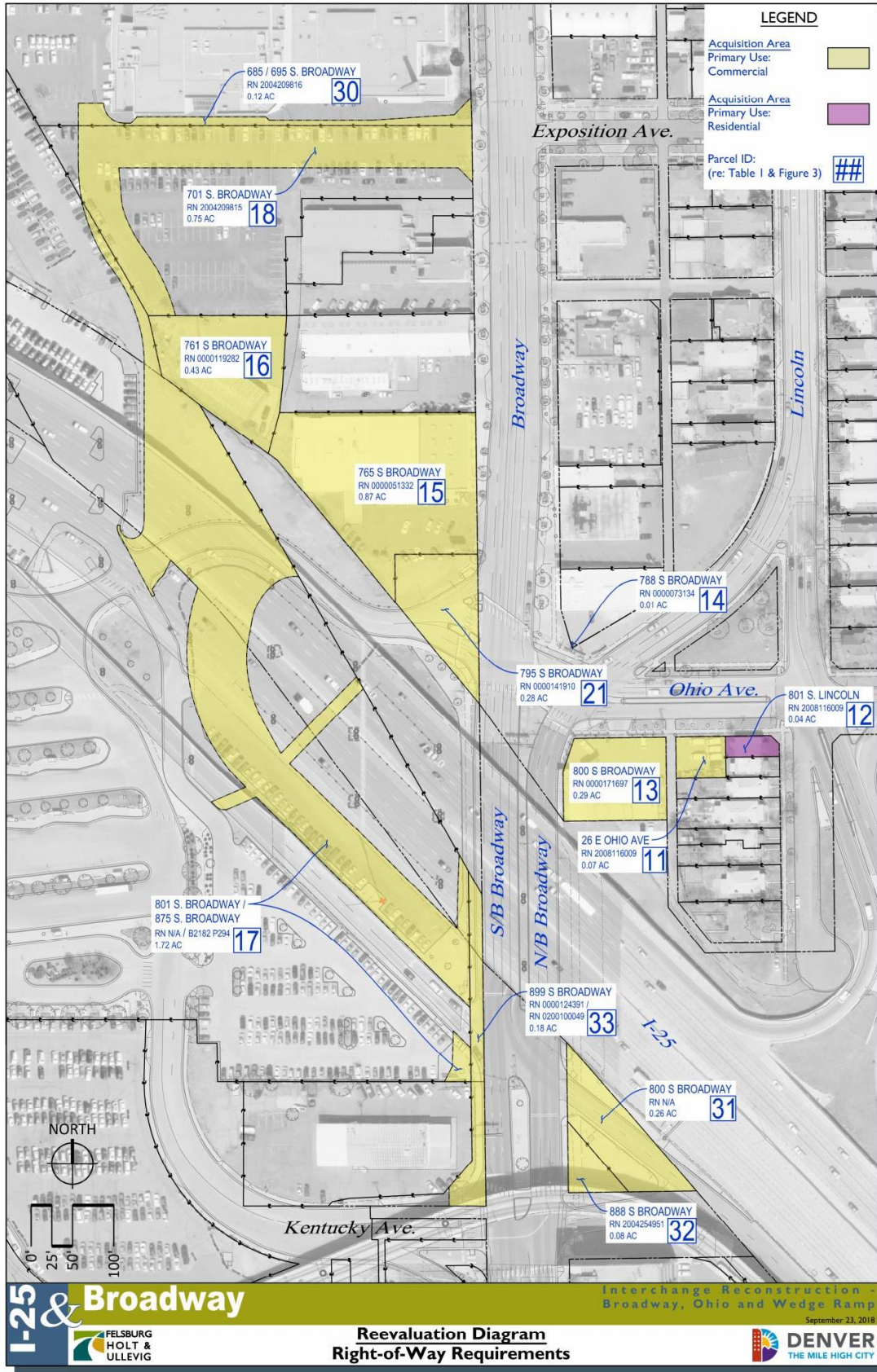


Figure 6. ROW Acquisition Figure from 2018-19 Reevaluation



Figure 7. Acquisitions for the 2021 Revised Design of Segment 3

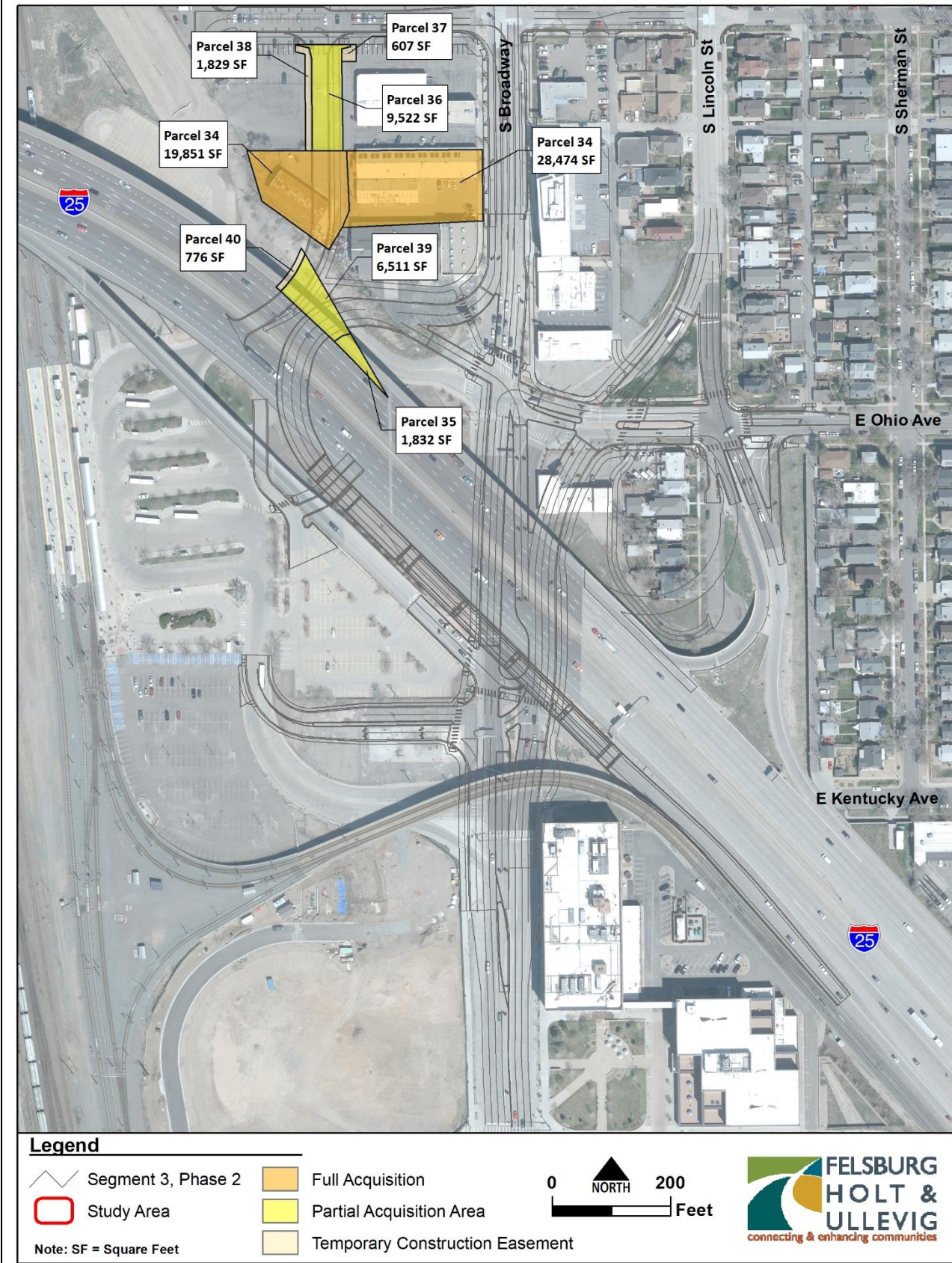
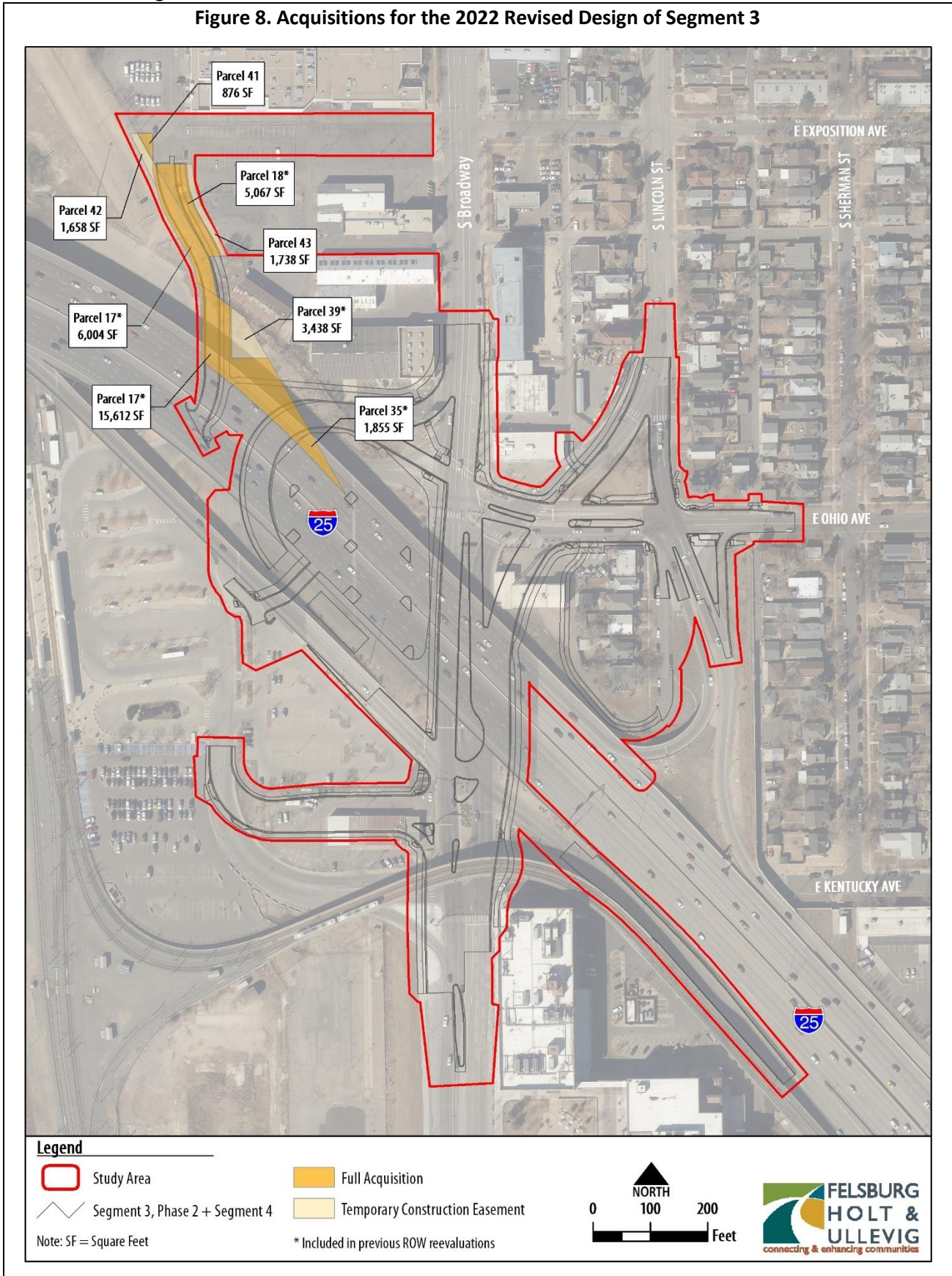


Figure 8. Acquisitions for the 2022 Revised Design of Segment 3



Transportation Resources (roadway, rail, bus, bike, pedestrian, etc.)

According to the 2008 EA/FONSI, traffic modeling forecasts indicated that future automobile and transit demand was projected to have acceptable LOS during both the morning and evening peak hours for intersections within the current study area for the year 2030. Traffic forecasts were updated using DRCOG Focus 2.3 activity-based model for the Year 2050.

Table 4 summarizes the 2050 Segment 3, Phase 2 + Segment 4 intersection LOS reported in the 2008 EA and this Reevaluation.

Table 4. Existing and 2050 Intersection Level-of-Service

Intersection	EA/FONSI (2008)		EA Reevaluation (2022)	
	2007 Existing LOS (AM/PM)	2030 LOS (AM/PM)	2021 Existing LOS (AM/PM)	2050 LOS (AM/PM)
S Broadway/E Kentucky Ave	A/A	Not Available (unsignalized)	E/C	Not Applicable
S Broadway/E Kentucky Ave and SB I-25 Off-Ramp	Intersection does not exist for specified alternative	C/D	Intersection does not exist for specified alternative	D/F
S Broadway/E Ohio Ave	B/A	Not available (unsignalized)	A/B	Intersection does not exist for specified alternative
S Broadway and E Ohio Ave and SB I-25 On-Ramp	Intersection does not exist for specified alternative	C/D	Intersection does not exist for specified alternative	B/C
S Broadway and SB I-25 On/Off-Ramp	B/E	Intersection does not exist for specified alternative	E/D	Intersection does not exist for specified alternative
S Lincoln St/E Ohio Ave (NB I-25 On/Off-Ramp)	B/F* and C/F*	A/A	F/F* and E/F*	C/B
S Lincoln St/S Walsh Pl	C/B	B/B	C/C	C/B

* - Unsignalized EB/WB Synchro Approach LOS

The 2050 operational analyses have been compared to the 2030 operational analyses conducted in support of the 2008 EA/FONSI for intersections modeled during the 2008 EA/FONSI. The S Broadway/E Kentucky Ave and SB I-25 Off-Ramp intersection is projected to operate at LOS D during the AM peak hour and degrade to LOS F in the PM peak hour. The 2050 LOS D reflects an increase in delay compared to the LOS C reported for the AM peak hour in the 2030 evaluation. Similarly, the LOS F for the PM peak hour from the 2050 evaluation degraded from LOS D in the 2030 evaluation.

The intersection at S Broadway and E Ohio Ave and SB I-25 On-Ramp was projected to operate at LOS C during the AM peak hour and LOS D during the PM peak hour in the 2030 evaluation. The 2050 AM peak hour is projected to be LOS B, with a PM peak hour LOS C. The 2050 AM and PM peak hours will improve from the 2030 evaluation.

The S Lincoln St and E Ohio Ave and NB I-25 On/Off-Ramp intersection is projected to operate at LOS C and LOS B for the AM and PM peak hours, respectively, in 2050, which is a major increase in delay from the 2030 LOS A in both the AM and PM peak hours.

In 2050, S Lincoln St/S Walsh Pl is projected to operate at LOS C in the AM peak hour and LOS B in the PM peak hour; the 2030 evaluation reported the same LOS B for both the AM and PM peak hours. Therefore, the 2050 projected LOS slightly degrades for the AM peak hour and slightly improves during the PM peak hour.

The System Level Study Update is included in **Attachment 6**.

Noise

The design from the 2008 EA/FONSI has not changed for this Project, and the Project does not include any new Type I elements. Thus, the EA noise analysis from the 2008 EA/FONSI is still valid, and no traffic noise technical analysis or report is necessary for Segment 3, Phase 2 + Segment 4.

Traffic noise findings from the 2008 EA/FONSI generally remain consistent for the Proposed Action associated with Segment 3, Phase 2 + Segment 4.

Visual Resources/Aesthetics

The visual impact assessment in the 2008 EA/FONSI established that the proposed wedge ramp would not impact the Washington Park View Plane, which is protected under the CCD View Plane Ordinance. The CCD land use ordinance “for the preservation of a certain panoramic view” to preserve views toward the Rocky Mountains establishes a view plane from a reference point within Washington Park that extends to the I-25 and Broadway Interchange area that limits building heights to allow clear mountain views.

The proposed streetscape improvements would enhance the visual quality of S Broadway, resulting in beneficial visual impacts. The proposed landscape planting area north of the Ford Building would result in beneficial impacts to the visual quality of a currently degraded setting. This is consistent with the current design and this Reevaluation.

The Visual Impact Assessment Technical Report is included in **Attachment 7**.

Hazardous Materials

A Modified Environmental Site Assessment was conducted for the 2008 EA/FONSI, and groundwater contamination related to the former Gates Rubber facility was present within the study area. There have been no changes regarding hazardous materials between the 2008 EA/FONSI and this EA Reevaluation.

The Modified Environmental Site Assessment and the Phase I Environmental Site Assessments for Hurricane Drain and the S Lincoln St Residential Houses are included in **Attachment 8**.

The Materials Management Plan is included in **Attachment 9**.

Cumulative Impacts

Resources evaluated from a cumulative impact standpoint in the 2008 EA/FONSI included traffic/transportation, land use (including community cohesion and community character), air quality, and historic resources.

Since this Project is a Reevaluation of the 2008 EA/FONSI, the same resources were evaluated for this assessment as were reviewed during the 2008 EA/FONSI Cumulative Impacts evaluation.

During the 2008 EA/FONSI, the Cumulative Impacts Study Area was expanded approximately 0.5 mile greater than the project study area; the same methodology was used for this assessment to determine the Cumulative Impacts Study Area. However, it should be noted that the study area for the 2008 EA/FONSI was substantially greater than the study area for this Reevaluation. The difference in study areas is due to the completed construction of Segments 1 and 2.

Differences between the 2008 EA/FONSI and this Reevaluation will primarily include status of the reasonably foreseeable future projects (**Table 5**).

Table 5. Reasonably Foreseeable Future Projects from the 2008 EA/FONSI

Project Name	Project Type/Description	Project Status
Valley Highway Environmental Impact Statement I-25 and Broadway	Interchange reconstruction and add through lanes	NEPA process completed with phased ROD.
Broadway, Arizona to Iowa Avenues	Reconstruction (moving curb out approximately 5 feet on either side of street to make room for a center median). Will provide for minimal capacity improvement.	Completed.
Redevelopment of the former Gates property on east and west sides of Broadway south of I-25; mixed-use, urban infill development	Traffic improvements include minimum 13.5-foot sidewalks on all internal roadways, and connected pedestrian system. Internal roadways to allow two-way traffic with connections to existing intersections at Kentucky, Tennessee, Mississippi (east of Broadway) and Arizona Avenues.	Approved zoning and general development plans.
I-25 and Broadway Station	Video surveillance replacement, asphalt overlay, landscaping and irrigation improvements.	Completed.
Alameda Avenue: Knox Court to I-25	Widening (possible lane addition).	Completed.
Alameda Avenue underpass between Cherokee Street and Santa Fe Drive	Maintenance, additional pedestrian and bicycle ways, and urban design elements.	Completed.
Mississippi Avenue/Santa Fe Drive Intersection	Reconstruction/improvements.	Completed.
Downtown Multimodal Access Plan	Integrated plan for vehicular, freight, pedestrian, bicycle and transit access into and throughout Downtown Denver.	Completed.
Denver Pedestrian Master Plan	Master plan intended to improve pedestrian conditions and increase pedestrian activity, especially with Areas of Change.	Completed.
Denver Storm Drainage Master Plan	Review of existing stormwater systems and identification of future improvements.	Completed.
Stormwater Quality Master Plan	Identify locations for water quality enhancements and create guidelines by which to enforce enhancement for development/redevelopment.	Completed.

Former RTD Bus Barn Site, Alameda Avenue and Santa Fe Drive	Potential redevelopment; transit oriented use indicated in Baker Neighborhood Plan.	Completed.
Rosemont Pharmaceutical, Alameda Avenue and Cherokee Street	New building, expansion of existing building, removal of existing parking lot.	Completed.
Townhome Development – Washington/Clarkson/ Arizona Avenues	Eleven townhomes.	Completed.
Condo and neighborhood business development — Buchtel South and Clarkson	Redevelopment; reconstruction of street with bike path and sidewalks.	Completed.

With the exception of the Valley Highway Environmental Impact Statement I-25 and Broadway (which is currently under design with this Reevaluation) and the redevelopment of the former Gates property, which is currently underway, all of the other projects listed in the 2008 EA/FONSI have been completed.

The Cumulative Impacts Technical Report is included in **Attachment 10**.

MITIGATION:

- All mitigation commitment(s) from NEPA document remain the same (discuss status and compliance).
- Mitigation commitment(s) have changed from NEPA document.

Mitigation measures remain the same as documented in the 2008 EA/FONSI for all resources and, based on design refinements, the following mitigation measures have been added. **Attachment II** provides the CDOT Mitigation Tracking Spreadsheet.

Table 6. Mitigation Commitments

Mitigation #	Mitigation Category	Impact	Mitigation Commitment	Responsible Branch	Timing / Phase of Construction Mitigation	Source Document
6	Wildlife and Fisheries	Removal of mature trees	A 1:1 replacement of removed trees was not achieved in Segment 3, Phase I due to project constraints. CCD maintained a record of removed trees not replaced in Segment 3, Phase I and the trees will be replaced in Segment 3, Phase 2 + Segment 4.	CCD Construction Engineering and CDOT Environmental	Construction	Segment 3, Phase I, Final Office Review Meeting Summary dated July 10, 2019
20	Economic	Removal of public parking spaces	Mitigation for the removed parking spaces will be completed through the construction of parking lots in place of demolished buildings.	CDOT Design Engineering and CDOT ROW	Design Construction, Right of Way	Roadway plans
26	Water Resources and Water Quality	Implementation of water quality features	A permanent water quality pond will be located to the area of the loop ramp. If additional area is needed for water quality, streetside stormwater planters will be installed within selected trees identified for planting.	CDOT Design Engineering and CDOT Construction Engineering	Design Construction	Project Drainage Report

<p>32</p>	<p>Historic and Archaeological Resources</p>	<p>Potential for impacts during excavation activities</p>	<p>The Contractor shall be responsible for avoiding and minimizing impacts to any historic streetcar remains discovered during construction on S Broadway. When the Contractor’s operations encounter streetcar remains, which can include steel or iron track, wooden ties, brick or wooden underlayment, cable conduit, and/or other historic artifacts associated with historic streetcar operations, the Contractor’s affected operations shall immediately cease and the Contractor shall immediately protect the discovery from damage and possible vandalism using coverings, fencing and other means as necessary.</p> <p>When a Contractor’s operations encounter streetcar remains, the Contractor shall immediately (same day of discovery) notify the Project Engineer and the Colorado Department of Transportation (CDOT) Region I Historian, Barbara Stocklin-Steely at (303) 757-9397, to ensure the project remains in compliance with federal and state historic preservation laws and regulations. The Contractor shall only recommence work in the area of the discovery when the Project Engineer and CDOT Historian certify that historic preservation compliance is achieved.</p> <p>If the Contractor fails to immediately cease construction and protect any discovery of historic streetcar remains, or notify the Project Engineer and the CDOT Historian of such a discovery, the Contractor shall assume full responsibility for any additional mitigation, history compliance or project delays that may be required to achieve federal and state history compliance.</p> <p>The Contractor shall be responsible for hiring a historian who meets the Secretary of the Interior’s Professional Qualification Standards in History to record the discovered streetcar remains to current Colorado Office of Archaeology and Historic Preservation (OAHP) Level I standards. Unless otherwise directed by the CDOT historian, this documentation shall at a minimum include a I403 survey form, a photograph log, and photographs taken with a medium format or 35mm camera film camera using black and white film (not C-41), or a digital camera producing a minimum 6MP and 3000 X 2000 pixels saved in a TIFF or RAW format. Digital or film proofs should be provided to and approved by the CDOT historian before the Contractor recommences work in the area of the discovery. A draft version of the survey form, photographs and photograph log shall be drafted and provided to the CDOT historian within 90 days of the discovery, and final submittals shall be provided to the CDOT historian within 30 days of receiving comments. The Contractor is responsible for ensuring the documentation receives final approval and acceptance by the Colorado OAHP.</p>	<p>CDOT Environmental and CDOT Construction Engineering</p>	<p>Construction</p>	<p>CDOT Historic Clearance dated April 19, 2022</p>
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<p>34</p>	<p>Hazardous and Solid Waste</p>	<p>Potential to encounter hazardous materials during construction</p>	<p>A Project-specific Materials Management Plan has been developed in order to address materials management and worker health and safety concerns during construction activities.</p> <p>Due to the potential to encounter contaminated soil and groundwater, as well as abandoned USTs, workers on this project shall follow CDOT Specification 250 – Environmental, Health and Safety Management.</p> <p>The Contractor shall be responsible for the workers' health and safety, the public, and the environment. In this regard, the Contractor shall prepare a project HASP for construction activities including monitoring and response actions for flammable gases by trained personnel.</p> <p>ACM may be located in the soil throughout the study area and project vicinity, specifically to the northwest and southwest of the intersection of S Broadway and I-25. A state certified asbestos building inspector shall inspect for the presence of asbestos when building/construction debris is encountered. In the event that suspected ACM is encountered, including with buried utilities, workers shall follow CDOT Specification 250.07 – Asbestos-Containing Material Management and CCD Asbestos-Contaminated Soil Management Standard Operating Procedure. Additionally, depending on the type of ACM, this material must also be abated in accordance with either Section 5.5 of the Solid Waste Regulations, or Regulation No. 8 of the Air Quality Control Commission Regulations.</p> <p>It is anticipated that dewatering activities may be required during the installation of deep foundation systems for new ramp structures, signals, or other features. Results of sampling within the Project vicinity indicate that solvent concentrations in groundwater exceed surface water and groundwater standards. Therefore, the water would require either treatment to meet those standards prior to discharge, or offsite disposal. In any circumstance, groundwater encountered during construction that requires displacement (e.g., during drilling of caissons) should be containerized and disposed of properly and must not be allowed to be discharged onto the ground, into a sewer, or into a water of the State of Colorado. Therefore, a CDPHE Discharges from Short-term (<2-year) Remediation Activities permit (COG317000) or a Discharges from Long-term (<2-year) Remediation Activities permit (COG318000) must be obtained from the CDPHE Water Quality Control Division. The Contractor is responsible for all costs and responsibilities associated with the application and maintenance of the permit.</p> <p>Electric transformers within the study area may contain PCBs. If Project activities will result in the disturbance or removal, impacted transformers may require special management and disposal. The Contractor should coordinate with the utility owner for proper removal and disposal of electrical equipment that may be disturbed during construction.</p>	<p>CDOT Construction Engineering and CDOT Environmental</p>	<p>Prior to Construction, Construction</p>	<p>I-25 and Broadway Interchange Reconstruction – Broadway, Ohio, and Wedge Ramp Materials Management Plan dated July 2022.</p>
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35	Hazardous and Solid Waste	Potential to encounter groundwater monitoring wells and groundwater remediation equipment during construction	Groundwater monitoring wells and groundwater remediation equipment, associated with the Gates Rubber Facility Parcel 8 and 9 CDPHE VCUP program, are located within the study area and project vicinity and impacts will not be avoidable. The Contractor shall coordinate with Kevin Szympruch, the Gates Rubber VCUP representative (303-981-7277) to determine if the wells should be abandoned, modified, or protected in place. Modification of the wells shall be in accordance with Revision of Section 210 and 604 – Adjust Structure Environmental Manhole Special. Documentation of the groundwater from these wells shall be provided to Mr. Szympruch. Well abandonment shall be done, if necessary, in accordance with Subsection 202.02 of the Standard Specifications and the State Engineer’s Office regulations and coordinated with the CDPHE and Mr. Szympruch.	CDOT Construction Engineering and CDOT Environmental	Construction	I-25 and Broadway Interchange Reconstruction – Broadway, Ohio, and Wedge Ramp Materials Management Plan dated July 2022
36	Hazardous and Solid Waste	Full and partial property acquisition	An ASTM-compliant Phase I Environmental Site Assessment should be completed before taking any additional ownership interested in properties considered for acquisition. Based on the results of those assessments, specific management practices for areas where contamination could be encountered during construction, or parcels where ROW is acquired in these areas, may be necessary.	CDOT Construction Engineering and CDOT Environmental	Construction	I-25 and Broadway Interchange Reconstruction – Broadway, Ohio, and Wedge Ramp Modified Environmental Site Assessment dated November 2020.

IV. Public/Agency Involvement

A virtual public meeting was held on February 17, 2021, during the completion of this Reevaluation. Additionally, the City and County of Denver hosted a meeting with the WWP Park Neighborhood Association (WWPNA) on December 17, 2020.

Furthermore, the City and County of Denver attended the WWPNA Annual Member Meeting on April 27, 2022, and provided project background, status updates, and answered questions.

There are no consulting Native American Tribes.

Section 106 consultation with SHPO and the consulting parties (Historic Denver, Denver Landmark Preservation, WWPNA, and Lincoln/Broadway Corridor Registered Neighborhood Organization) occurred, and copies of the consultation materials are available in **Attachment 3**, Effects and Eligibility Coordination and Correspondence.

Responses were received from SHPO and the WWPNA, and copies are included within **Attachment 3**. No responses were received from Historic Denver or Denver Landmark Preservation.

V. Additional Studies Required for Proposed Action

None.

VI. Additional Requirements for Proposed Action

- An SEIS is required, because the changes to the proposed action will result in significant impacts not evaluated in the EIS.
- An SEIS is required, because new information or circumstances will result in significant environmental impacts not evaluated in the EIS.
- A revised ROD is required, because an alternative is recommended that was fully evaluated in an approved FEIS but was not identified as the preferred alternative.
- Appropriate environmental study or an EA is required, because the significance of new impacts is uncertain.
- A revised FONSI is required, because an alternative is recommended that was fully evaluated in an approved EA but was not identified as the preferred alternative.
- Other
- None

There are no additional requirements for the Proposed Action.

VII. Permits Updated

This section is only required when the next stage of a project is going to construction.

List permits:

Table 6: Summary of Permits

Permit/Approval	Agency	Regulated Activity
Construction Stormwater Permit	CDPHE, Water Quality Control Division	Stormwater discharges during construction
Construction Dewatering Permit	CDPHE, Water Quality Control Division	Potential to disturb or generate water that has been detrimentally affected by the subsurface work and detriment from past land uses.
Construction Activities Stormwater Discharge Permit	CCD	Stormwater discharges during construction
Coordination and approval for handling and management plan. Notification as Resource Conservation and Recovery Act (RCRA) hazardous waste generator	CDPHE, Hazardous Materials and Waste Management Division	Generation of contaminated materials during construction. Generation of hazardous waste.
Air Quality Permit	CDPHE, Air Pollution Division	Emissions from portable units, such as rock crushers, generators, asphalt plants, and cement plants, used during construction
Construction Permits	CDPHE, Air Pollution Control Division	Emissions due to construction activities
Development of Materials Management Plan with approval by the Regional Planning and Environmental Manager	CDOT Environmental	Generation of contaminated materials during construction
National Historic Preservation Act Section 106 Review	Colorado Historical Society Office of Historical Preservation	Impacts to cultural resources
Street Occupancy Permit	CCD, Public Works	Occupancy of right-of-way
Construction Access Permits Traffic Control Plan	CCD, Public Works	Traffic control during construction
Noise Variance	CCD, Denver Department of Public Health and Environment	May be needed for noise generation during construction at night
Coordination and Approval for Handling and Management Plan	CCD, Denver Department of Public Health and Environment	Generation of contaminated materials during construction
Wastewater Discharge Permit	CCD, Wastewater Management Division	Discharge of wastewater generated during construction activities to the treatments works (if needed)
Review and approval for design and construction	CCD, Public Works	Design and construction associated with city-maintained streets, parks, and sewers
Health and Safety Plan	CCD, Denver Department of Public Health and Environment	Generation of potentially contaminated waters and soils

Discharge Permit	CCD, Wastewater Management Division	Discharge of groundwater to a city storm sewer
Coordination and approval	CCD, City Forester	Tree removal

VIII. Attachments Listed

- List permits, studies, background data, etc.*
- Attachment 1: Air Quality Technical Report
 - Attachment 2: Biological Technical Report
 - Attachment 3: Historic Documentation
 - Attachment 4: Land Use, Social, and Economic Resources Technical Report
 - Attachment 5: Environmental Justice Technical Report
 - Attachment 6: System Level Study Update
 - Attachment 7: Visual Impact Assessment Technical Report
 - Attachment 8: Modified Environmental Site Assessment; Phase I Environmental Site Assessment: Hurricane Drain; and Phase I Environmental Site Assessment: South Lincoln Street Residential Houses
 - Attachment 9: Materials Management Plan
 - Attachment 10: Cumulative Impacts Technical Report
 - Attachment 11: CDOT Mitigation Tracking Spreadsheet

IX. Conclusion and Recommendation

- The above environmental document has been reevaluated as required by 23 CFR 771.129 and it was determined that no substantial changes for the Segment 3, Phase 2 + Segment 4 – Broadway, Ohio, and Wedge Ramp Reevaluation Project have occurred in the social, economic, or environmental impacts of the Proposed Action that would substantially impact the quality of the human, socio-economic, or natural environment. Therefore, the original environmental document or Catex designation remains valid for the Proposed Action. It is recommended that the identified project advance to the next phase of project development.
- The above environmental document has been reevaluated as required by 23 CFR 771.129 and it was determined that the environmental document or Catex designation is no longer valid or more information is required.

The reevaluation of this environmental document has determined that no substantial changes have occurred. The original environmental document remains valid for the Proposed Action and the identified project is recommended to advance to the next phase of project development.

Regional Planning Environmental Manager or Designee

Digitally signed by Jane Hann
Date: 2022.10.25 15:27:06 -06'00'

10/25/2022
Date

JOHN MARTIN CATER Digitally signed by JOHN MARTIN CATER
Date: 2022.10.28 14:27:45 -06'00'

Federal Highway Administration Division Administrator or Designee

Date

Attachment 1: Air Quality Technical Report

This air quality technical report presents the overall analysis for assessing potential air quality impacts from the Proposed Action. The overall analysis evaluates the emission levels of criteria air pollutants and mobile source air toxic pollutants in accordance with the Clean Air Act and its amendments for designated nonattainment and/or attainment/maintenance areas. This analysis also addresses greenhouse gas (GHG) emissions.

Based on the results of the project-level hot-spot analysis completed for CO, no receptor sites are predicted to experience concentrations in excess of the current CO NAAQS. This project will not cause or contribute to any new localized NAAQS violation; increase the frequency or severity of any existing NAAQS violation; or delay timely attainment of any NAAQS or any required interim emission reductions or other milestones in the maintenance area. As a result, mitigation measures for air quality are not necessary for the project.

Attachment 2: Biological Technical Report

For this Biological Resources Technical Report, no noxious weed species were identified within the study area, but a separate noxious weed survey should be conducted by a qualified biologist in the growing season, and mitigation activities must be identified before any construction activities occur. No wetlands or other waters of the US were found within the study area. No state or federally listed threatened, endangered, or species of special concern have suitable habitat within the study area. This project would have no effect on any special status species. No migratory birds or active nests were observed in the study area; however, the survey was conducted after the nesting season. A qualified biologist is required to complete an additional migratory bird and raptor nest survey if construction activities occur within the nesting season for birds (February 15 and August 31).

Attachment 3: Historic Documents

Attachment 3 provides an overview and summary of National Register of Historic Places (NRHP) determinations of eligibility for historic properties associated with Segment 3, Phase 2 + Segment 4. It forms the basis of CDOT's Section 106 consultation with consulting parties, including the Colorado State Historic Preservation Office.

A file search through the OAHIP Compass database and literature review identified 31 potential resources within the Segment 3, Phase 2 + Segment 4 APE. Of these, 29 resources were previously recorded; 1 resource consists of the Broadway Brick Sewer – a component of the Denver Brick Sewer System; and 1 new resource was identified as meeting the minimum age requirement for NRHP eligibility. CDOT and FHU conducted intensive level documentation for 19 properties as part of this analysis. OAHIP site forms for resources evaluated as part of the Segment 3, Phase 2 + Segment 4 Project are also included as an appendix to this report.

Two residential properties and 1 commercial property were determined to be eligible to the NRHP. However, proposed transportation improvements would not directly impact these properties, and indirect impacts are anticipated to be minor and non-invasive.

Two additional subsurface linear resources (trolley tracks and sewer line) and one historic district were also found to be located within the APE and were treated as NRHP eligible. No impacts are anticipated to the historic Denver Brick Sewer System resource; therefore the project will result in a determination of no adverse effect to resource 5DV.9953. However, one segment of subsurface resource 5DV.9217.3 Denver Tramway will likely be directly impacted as a result of reconstruction of the S. Broadway roadbed, resulting in an adverse effect to this NRHP eligible resource.

Attachment 4: Land Use, Social, and Economic Technical Report

Land use in the project area is tied to commercial, residential, and light industrial areas. Vacant properties in and near the study area may be developed over time. However, it is not anticipated that future land use will be subjected to drastic change.

The Project will provide transportation improvements consistent with future land use in the area and will convert a portion of land to transportation use as permanent roadway right-of-way (ROW). Community facilities would not be negatively impacted and would likely benefit from the Project. The Project will improve access to surrounding neighborhoods with improved sidewalks, improve access to neighborhood travel patterns and the RTD I 25/Broadway bus and light rail station, and improve pedestrian signals and crosswalks within the study area.

Project improvements will serve non-personal vehicle populations, such as school children, disabled persons, and the elderly.

During construction, residents and the users of community facilities could be temporarily affected by limited access and traffic congestion. The Project would also include temporary construction-related impacts to travel patterns resulting in delays during construction.

The Project would likely improve access to the established businesses and major employment centers, thereby increasing economic activity and expanding employment opportunities. The Project could potentially attract new businesses through improved traffic flow and access in the area.

The Project would require the full acquisition of 20 parcels totaling approximately 9 acres of private property. Acquisitions would result in an approximate yearly loss of property tax revenues of \$123,424 in 2021 dollars assuming that taxation rates do not decrease or increase. However, it is possible that the entire parcel may not be needed for ROW and the remnant could be sold back into private ownership. If partial parcels revert back to private ownership, property taxes would be collected for that square footage.

The improved mobility and safety aspects would likely encourage businesses to move into the study area having a positive impact on the future redevelopment opportunities. This reinvestment in the study area would have positive impacts on nearby property values.

Attachment 5: Environmental Justice Technical Report

For this Environmental Justice (EJ) analysis, any census block group that intersected the project corridor was included in the “community study area.” Three block groups make up the community study area and include Census Tract 21.02, Block Group 4 and Census Tract 29.01, Block Groups 2 and 3. Census Tract 21.02, Block Group 4 primarily consists of commercial and light industrial properties with limited areas of residential development located in the north central portion of the block group. There has also been recent construction/revitalization occurring within this block group.

The residential area mainly consists of apartment buildings and, according to the American Community Survey (ACS) 2016-2020 5-Year Estimates data, this block group has a total population of 459 individuals. Even though this block group is the largest in total acreage, with a total area of 291 acres, it contains the smallest population. Census Tract 29.01, Block Group 2 is 60 acres with a population of 987 and Census Tract 29.01, Block Group 3 is 81 acres with a population of 950.

Low-income populations for Census Tract 29.01 Block Group 2 (10 percent) and Census Tract 29.01: Block Group 3 (6 percent) were below the county and state percentages. Census Tract 21.02: Block Group 4 was below the Denver County percentage of low-income households, but equal to the Colorado state percentage. None of the block groups that made up the EJ community study area surpassed the state or county levels for low-income populations.

Census Tract 21.02, Block Group 4 is considered an EJ population because the area exceeds both county and state percentages for minority households.

The impacts from the Project’s improvements to the identified low-income and minority populations are not considered to be disproportionate. The effects of the South Broadway Interchange Reconstruction improvements will impact EJ populations during construction; however, the mitigation measures and benefits of the Project will offset the impacts to the minority or low-income populations.

Attachment 6: System Level Study Update

This System Level Study meets the requirements of Colorado Department of Transportation's (CDOT) Policy Directive 1601.0. In this System Level Study Update, the Preferred Alternative has been tested to ensure that the configuration remains appropriate. The analyses included in the SLS Update have upheld the selection of the Preferred Alternative, creating the Updated Preferred Alternative which incorporates refinements while remaining consistent with the basic configuration of the Preferred Alternative.

Attachment 7: Visual Impacts Assessment Technical Report

Attachment 7 identifies the visual impact assessment process for this project. The VIA process includes scoping, inventory, analysis, and mitigation. The VIA process uses a scoping questionnaire and looks at landscape context to identify issues.

The following summarize the impacts to the visual quality of Landscape Unit A.

Wedge Ramp Wall and Access to the Pedestrian Underpass Under I-25 Viaduct: The wedge ramp walls under I-25 will be approximately 350 ft. in length and will transition from ground level to a height of approximately 20 ft. at the south edge of the existing I-25 viaduct at South Broadway; the walls will tie into the southbound I-25 on-ramp over Broadway. The vehicle and pedestrian underpass would be approximately 38 ft. wide and range in height from 13 ft. to 16 ft. at the top of the viaduct rail. Openings in the upper portions of the wedge ramp will allow natural lighting under the I-25 viaduct and entrance to the pedestrian underpass. Existing lighting under the viaduct meets RTD requirements for pedestrian lighting and the pedestrian underpass will have lighting designed in accordance with RTD requirements for pedestrian lighting.

While the scale of the wedge ramp wall and pedestrian underpass would attract attention, the moderate visual contrast is considered visually compatible within the I-25 Interchange setting.

Wedge Ramp South of I-25: The scale of the proposed wedge ramp would result in moderate levels of visual contrast to travelers and pedestrians along South Broadway. The wedge ramp would match the top of the existing I-25 viaduct at South Broadway (approximately 24 ft. at the South Broadway median), color, design, and materials. The color will be equivalent to Federal Standard 595c Color 25630 (Light Gray) and Color 36357 (Gray). The proposed southbound I-25 on-ramp would be approximately 39 ft. in width, with a separation of approximately 10 ft. between the existing viaduct.

For pedestrians, the length of the sidewalk under the viaduct would increase to approximately 300 ft.

Streetscape Improvements: The proposed streetscape improvements would enhance the visual quality of South Broadway, resulting in beneficial visual impacts. The proposed landscape planting area north of the Ford Building would result in beneficial impacts to the visual quality of a currently degraded setting.

The following summarizes the impacts to the visual quality of Landscape Unit B:

Wedge Ramp Wall and Pedestrian Underpass: The I-25 southbound off-ramp would partially screen the south side of the wedge ramp wall from RTD Broadway Station platform views. The color, design, and materials of the wedge ramp walls would match the existing I-25 viaduct and southbound I-25 off-ramp and retaining walls as noted previously, thereby minimizing potentially adverse visual impacts. The pedestrian underpass would create a more visually coherent future project environment for pedestrians walking between the RTD Broadway Station and the parking area under I-25 than existing conditions. However, the pedestrian experience within the underpass and at the underpass entrance may result in a moderate visual contrast.

Attachment 8: Modified Environmental Site Assessment

A Modified Environmental Site Assessment provides information about facilities that pose a potential risk of regulated hazardous materials and/or environmental contamination from Recognized Environmental Conditions (RECs), Controlled RECs (CRECs), and Historical RECs (HRECs)¹, which may impact owner liability in the event of property acquisition or easements. This MESA has been prepared in general accordance with the ASTM Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process (E 1527-13) and CDOT Hazardous Materials Guidance (CDOT, 2018).

The assessment looked at the study area in relation to its physical setting, topography, elevation, surficial soil, geology, and hydrogeology.

FHU obtained from GeoSearch a database report of regulatory agency environmental records concerning known releases of hazardous substances or petroleum products, the location of landfills, and the generation, storage, or transport of hazardous waste. The search was conducted in accordance with the search radii specified in the ASTM Standard. The agency database report identified 90 facilities. The review of regulatory files identified 10 listings with the potential to impact the study area.

The assessment also looked at historical land use and included a reconnaissance survey conducted from public right-of-way. It assessed current land uses and observable activities associated with properties in and adjacent to the study area.

Phase I Environmental Site Assessment: Hurricane Drain, 800 South Broadway

Felsburg Holt and Ullevig (FHU), acting on behalf of the City and County of Denver, Department of Transportation and Infrastructure, completed a Phase I Environmental Site Assessment (ESA) for the commercial property occupied by Hurricane Drain for the planned I-25 & Broadway Interchange Reconstruction, Broadway, Ohio, and Wedge Ramp Project.

The parcel is addressed as 800 South Broadway.

FHU evaluated the subject property for recognized environmental conditions (RECs) by reviewing maps and literature; reviewing environmental records available from local, state, and federal government agencies; reviewing aerial photography; and conducting a site reconnaissance.

Based on the Phase I ESA findings, the following RECs, controlled recognized environmental conditions (CRECs), and/or historical recognized environmental conditions (HRECs) were identified.

One REC identified as Nebraskaland Tire/Gates Parcel s 8 & 9, NW & SW Corner of South Broadway and Kentucky

No CRECs

One HREC identified as RTD T-REX South Broadway, 800 South Broadway (also identified as 808 South Broadway)

The Phase 1 ESA listed recommendations and discussed data gaps.

Phase I Environmental Site Assessment: South Lincoln Street Residential Houses, 801 – 831 South Lincoln Street

Felsburg Holt and Ullevig (FHU), acting on behalf of the City and County of Denver, Department of Transportation and Infrastructure, completed a Phase I Environmental Site Assessment (ESA) for the South Lincoln Street Residential Houses for the planned I-25 & Broadway Interchange Reconstruction, Broadway, Ohio, and Wedge Ramp Project.

For the purposes of this assessment, the eight parcels were considered to be one “subject property.” The eight parcels are addressed as 801/803, 805, 807, 819/823, 827, and 831/833 South Lincoln Street.

FHU evaluated the subject property for recognized environmental conditions (RECs) by reviewing maps and literature; reviewing environmental records available from local, state, and federal government agencies; reviewing aerial photography; and conducting a site reconnaissance.

Based on the Phase I ESA findings, the following RECs, controlled recognized environmental conditions (CRECs), and/or historical recognized environmental conditions (HRECs) were identified.

One REC identified as Nebraskaland Tire/Gates Parcel s 8 & 9, NW & SW Corner of South Broadway and Kentucky
No CRECs or HRECs were identified.

The Phase 1 ESA listed recommendations and discussed data gaps.

Attachment 9: Materials Management Plan

This Materials Management Plan (MMP) was developed to assist field construction personnel in preparing for the identification and management of soil and groundwater that may be encountered during construction. For this Project, Kraemer North America (Kraemer) is the construction contractor. It is the intent that this MMP will be attached to the Project Plans and Specifications. When properly implemented by Kraemer, this MMP will provide guidance to complete work activities in such a way as to protect human health and the environment. This MMP has been prepared to minimize potential delays and to develop approved standard procedures that will be implemented as needed in the event that suspect materials are encountered during construction. Kraemer is responsible for following all appropriate regulations, obtaining proper permits, transferring existing permits, and using field personnel trained to identify potential contamination. If any discrepancy is noted between this MMP and any applicable regulation, the regulation will take precedence, unless the regulatory agency has previously approved a variance

Attachment 10: Cumulative Impacts Technical Report

Resources identified for cumulative effects analysis include traffic/transportation, land use, air quality, and historic properties.

Past and present actions have shaped the current state of traffic/transportation, land use, air quality, and historic resources within the study area and the direct and indirect impacts of the Project would not incrementally result in a substantial cumulative impact for the resources analyzed. The manner in which development and use occur, as managed by the City and County of Denver, will shape the environment into the future. Adherence to current and future regulatory requirements and planning practices would minimize the adverse cumulative effects of the Project. When combined with other past, present, and reasonably foreseeable future actions, the Project would not be expected to substantially adversely impact the resources analyzed.

Attachment 11: CDOT Mitigation Tracking Spreadsheet

Attachment 11 includes an Excel spreadsheet listing mitigation commitments, impacts, responsible party, timing of mitigation, date mitigation was completed, agency name if coordination required, the name of the person who completed mitigation, and comments.