

Appendix B: Agency Coordination

1.0 AGENCY COORDINATION

The agency coordination activities conducted as part of the E. 88th Avenue (I-76 NB Ramps to Highway 2) Project Environmental Assessment helped identify shared goals and objectives, resolve issues and concerns, and address project needs.

1.1 Scoping Meetings

An environmental scoping meeting with the Colorado Department of Transportation (CDOT) environmental discipline leads was held on November 11, 2018, to review each environmental resource area that would be covered in this Environmental Assessment and to determine what coordination would be needed with the environmental resource agencies over the course of the study.

The state and federal agencies with jurisdiction over resources that could have potentially been impacted by the Proposed Action were invited to participate in a resource agency coordination meeting on June 10, 2019. The meeting invitation and list of invitees are included in Attachment A.

- ◆ Transportation Agencies
 - Colorado Department of Transportation
 - Federal Highway Administration
 - Denver Regional Council of Governments
 - Regional Transportation District
- ◆ Resource Agencies
 - Colorado Department of Public Health and Environment, Air Pollution Control Division
 - Colorado Department of Public Health and Environment, Water Quality Control Division
 - Colorado Department of Public Health and Environment, Hazardous Materials and Solid Waste Management Division
 - Colorado Department of Public Health and Environment, Oil and Gas Division
 - Colorado Parks and Wildlife
 - State Historic Preservation Officer
 - U.S. Army Corps of Engineers
 - U.S. Environmental Protection Agency
 - U.S. Fish and Wildlife Service
- ◆ Local Agencies
 - City of Commerce City
 - Adams County

2.0 SECTION 106 CONSULTATION

Under Section 106 of the National Historic Preservation Act of 1966 (36 CFR 800), federal agencies are required to take into account the effects of their undertakings on historic properties. This process involves identifying historic properties, evaluating effects, and resolving adverse effects. Section 106 correspondence is included in Attachment B.

3.0 NATIVE AMERICAN CONSULTATION

In June 2019, CDOT contacted federally recognized tribes with an established interest in Adams County, Colorado, and invited them to participate as consulting parties, including:

- ◆ Northern Cheyenne Tribe
- ◆ Pawnee Nation of Oklahoma
- ◆ Comanche Nation

The three tribes responded to the solicitation and indicated they were not interested in participating as a consulting party. No additional tribes expressed interest in participating in the project. Correspondence related to Native American consultation is included in Attachment C.

4.0 REGULAR AGENCY COORDINATION

From fall 2018 to summer 2020, three Technical Advisory Committee meetings were held with technical leads from CDOT, Federal Highway Administration, Denver Regional Council of Governments, and Commerce City regularly in attendance. The following agencies were invited to address specific issues when needed and included Union Pacific Railroad, Mile High Flood District, Regional Transportation District, Colorado Motor Carriers Association, the South Adams County Water & Sanitary District, and Adams County. The Union Pacific Railroad and Colorado Motor Carriers did not attend. Attendees confirmed the environmental analysis approach and identified the need for coordination with additional resource agencies when appropriate. Other than the separate coordination with SHPO, no additional resource agency coordination (outside of CDOT and the Federal Highway Administration) was determined necessary.

Attachment A. Resource Agency Coordination Meeting

Speck, Mary

To: Myklebust - CDOT, Jessica
Subject: RE: 88th Avenue Environmental Assessment Agency Coordination Meeting

----- Forwarded message -----

From: **Myklebust - CDOT, Jessica** <jessica.myklebust@state.co.us>
Date: Thu, May 30, 2019 at 2:18 PM
Subject: 88th Avenue Environmental Assessment Agency Coordination Meeting
To: Trettin, Diana - PW <dtrettin@c3gov.com>, Halouska, Troy <Troy.Halouska@atkinglobal.com>, Jessica Myklebust - CDOT <Jessica.myklebust@state.co.us>, <Than.Ly@state.co.us>, Horn, Chris (FHWA) <Chris.Horn@dot.gov>, <msloan@adcogov.org>, Tripp Minges - CO <Tripp.minges@state.co.us>, <richard.coffin@state.co.us>, <Garrison.kaufman@state.co.us>, <emmett.malone@state.co.us>, <lisa.devore@state.co.us>, <Kent.kuster@state.co.us>, <Jill.parisi@state.co.us>, <edwardhsmith@state.co.us>, <caren.johannes@state.co.us>, <Margo.griggin@state.co.us>, <Meg.parish@state.co.us>, <Megan.lacey@state.co.us>, <scook@drcog.org>, <Daniel.menter@rtd-denver.com>, <Jason.obrien@state.co.us>, <Aaron.R.Eilers@usace.army.mil>, <Strobel.philip@epa.gov>, Alison Deans Michael <Alison_Michael@fws.gov>, Gibson, Stephanie (FHWA) <stephanie.gibson@dot.gov>, Brian Fauver - CDOT <brian.fauver@state.co.us>

Hello Agency Partners.

CDOT is hosting an EA coordination meeting for the Commerce City 88th Avenue EA (I-76 NB Ramps to Highway 2). Please see the attached invitation for information on this meeting.

Kindly respond your RSVP by June 6, 2019.

Please feel free to contact me if you have any questions.

Jessica Myklebust, LEED-AP
Region 1 Environmental Manager
303-757-9929
2829 West Howard Place, Denver, CO 80204
jessica.myklebust@state.co.us | www.codot.gov

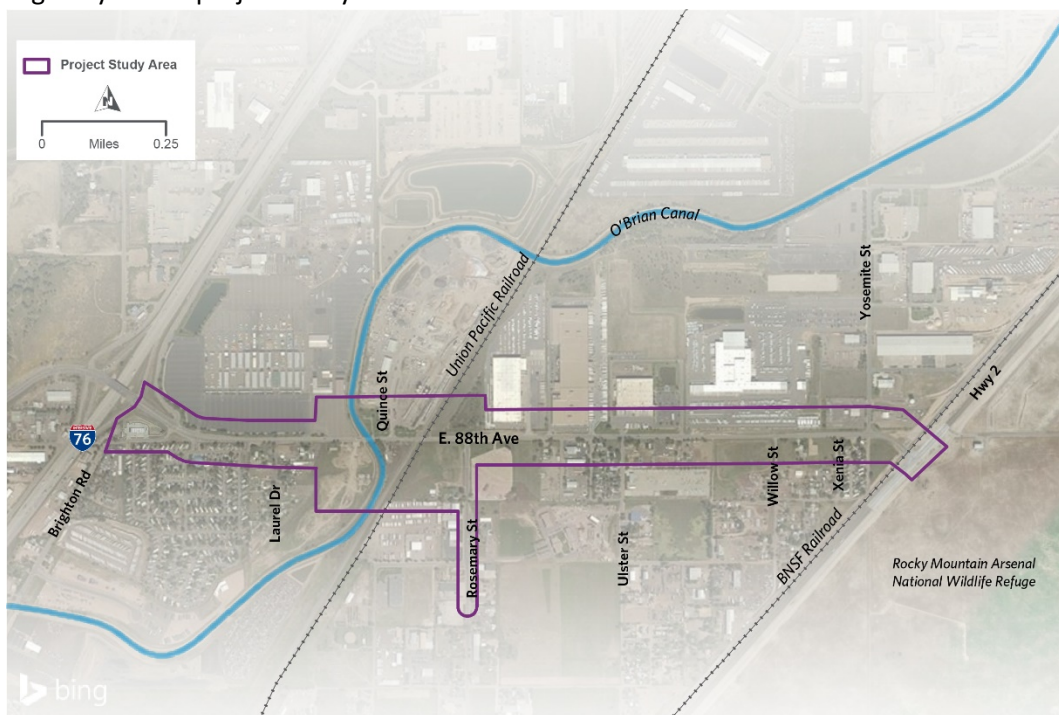




May 30, 2019

RE: Invitation to Resource Agency Coordination Meeting for East 88th Avenue Environmental Assessment (I-76 NB Ramps to Highway 2)

The City of Commerce City, in consultation with the Federal Highway Administration (FHWA) and the Colorado Department of Transportation Region 1 (CDOT), invite you to attend a resource agency coordination meeting for the E. 88th Avenue Environmental Assessment (EA): I-76 NB Ramps to Highway 2. The project study area is shown below.



The purpose of the project is to improve traffic operations and accommodate current and future general vehicular traffic, heavy trucks, bicycles, and pedestrians on E. 88th Avenue within the project limits.

Project goals include:

- Improve signal connectivity.
- Widen E. 88th Avenue to accommodate future travel demand.
- Improve at-grade railroad crossing with grade-separated structure.



- Build sidewalks along the roadway and provide pedestrian/bicycle accommodations as called for in the city's Walk-Bike-Fit Plan.

The City of Commerce City is leading this project and has retained EST, Inc. and HDR to prepare a Template EA, preliminary design, and right of way plans for the Proposed Action alternative. A Technical Advisory Committee (TAC) has been convening regularly since December 2018. Agencies that are part of this group are FHWA, CDOT, Denver Regional Council of Governments (DRCOG), RTD, Adams County, UP Railroad, South Adams County (SAC) Water and Sanitation, SAC Fire, Urban Drainage & Flood Control, Motor Carriers Assoc., and City of Commerce City staff. The EST/HDR team has consulted the CDOT Region 1 and Environmental Programs Branch during scoping to identify initial resource concerns. This meeting serves as the official coordination meeting for the resource agencies.

This resource agency coordination meeting is scheduled for **June 10, 2019, at 1:30 p.m. to 2:30 p.m.** at the CDOT offices located at 2829 W Howard Place, Denver, CO 80204. Please check in at the front lobby and a team representative will come and meet you.

The purpose of the meeting is to introduce your agency to the project and obtain agency comments on important environmental resource or regulatory issues. The meeting agenda will include:

- Introductions
- Present project study area
- Review purpose and need
- Discuss the alternatives evaluation process
- Present proposed project components
- Review project schedule
- Agency by agency discussion

Your agency's involvement is valuable as we proceed through the NEPA process. Please R.S.V.P. to Jessica Myklebust, by telephone at 303-757-9929 or by email at Jessica.myklebust@state.co.us by June 6, 2019. Please send a representative if you are unable to attend and/or forward this invitation to the appropriate individual if you feel you are not the correct recipient. If your agency is unable to participate, please let me know if you would like materials or a briefing provided separately.

I look forward to your participation, and thank you for your cooperation.

Sincerely,



Jessica Myklebust, LEED-AP
CDOT Region 1 Regional Environmental Manager

Enclosures:
Purpose and need statement



E. 88th Avenue Environmental Assessment (I-76 NB Ramps to Highway 2)

What is the Purpose and Need for the Project?

Purpose:

The purpose of the E. 88th Avenue project is to improve traffic operations and accommodate current and future general vehicular traffic, heavy trucks, bicycles, and pedestrians on East 88th Avenue (E. 88th Avenue) between Interstate 76 (I-76) and Highway 2 (Hwy 2).

Need:

The needs for the project are described by two interrelated statements:

- **Need 1: Improve roadway operations.** E. 88th Avenue is a two-lane minor arterial roadway. Roadway operations on E. 88th Avenue are negatively affected by its substandard road design characteristics that cause congestion, such as narrow lane widths and lack of turn lanes and acceleration/deceleration lanes. The high number of access points increases congestion on the corridor as vehicles accelerate and decelerate to turn in and out of the driveways, affecting overall corridor efficiency.

E. 88th Avenue has insufficient capacity to accommodate the projected demand for vehicle trips in the corridor. Daily traffic volume in 2018 exceeded 20,000 vehicles per day at Rosemary Street with a current level-of-service (LOS) rating of B. Daily volume at this location is projected to exceed 27,500 vehicles per day in 2040 (an increase of 37.5%), operating at LOS E.

Lack of adequate roadway capacity and slow-moving or stopped freight trains at an at-grade Union Pacific Railroad crossing just west of Rosemary Street create slow and unpredictable travel times, with 10 freight trains on average crossing E. 88th Avenue per 24-hour period, 5 during the day and 5 at night (Federal Railroad Administration, 2017). The slow or stopped trains frequently block traffic creating a queue of vehicles on E. 88th Avenue. During these road blockages, it has been observed that some heavy trucks headed eastbound leave the queue and travel illegally on the westbound lane to turn onto Quince Street. At the same time, other vehicles leave the queue and make U-turns into the westbound lane, creating a potential conflict with the heavy trucks using the westbound lane to turn onto Quince Street. Additionally, the slow and stopped trains impede emergency responder access to incidents and increase response time.

- **Need 2: Accommodate all users.** The E. 88th Avenue corridor serves commuter, residential, and commercial trips. The number of heavy truck trips exceeds 15% of overall trips during peak hour, and the growth of heavy-truck traffic is expected to keep pace with the growth of general vehicular traffic. The substandard road design characteristics do not accommodate efficient heavy truck movements and contribute to congestion. In addition, there are no sidewalks or bicycle facilities on E. 88th Avenue and no pedestrian or bicycle connections to the bus stops on Brighton Road. This causes pedestrians and bicyclists to use the unpaved shoulder, compromising safety, and can discourage non-vehicular travel in the corridor.



Attachment B.

Section 106 Correspondence



COLORADO
Department of Transportation

Region 1
Planning & Environmental
2829 W. Howard Place,
Denver, CO 80204

December 10, 2019

Mr. Steve Turner, AIA
State Historic Preservation Officer
History Colorado Center
1200 Broadway
Denver, CO 80203

Re: Determinations of National Register of Historic Places Eligibility, 88th Ave., I-76 to Hwy. 2 Environmental Assessment, Commerce City, Adams County, CDOT Project STU M245-013, SA#22285

Dear Mr. Turner,

This letter and the enclosed attachments constitute a request for concurrence on an Area of Potential Effects (APE) and determinations of National Register of Historic Places (NRHP) eligibility for the Commerce City project described above, 88th Ave., Interstate-76 (I-76) to Hwy. 2 Environmental Assessment (EA) in Adams County, Colorado (Project). Because the Project is federally funded, the Colorado Department of Transportation (CDOT) and the Federal Highway Administration (FHWA), in coordination with Commerce City, are conducting the EA. CDOT is playing the lead role for the Section 106 process (36 CFR 800), to consider the project's effects on historic resources.

The project consultant, HDR, developed the Historic Resources Survey for 88th Avenue: I-76 NB Interchange Ramps to Highway 2 (survey report), which provides background on the project, lays out the APE, delineates the methodology to identify historic properties, provides a historic context for the project area, and identifies and evaluates the NRHP eligibility of historic and potentially historic resources within the APE. Along with the survey report, survey forms were completed for 48 resources within the APE. The survey report and forms are enclosed.

Project Description

The Project proposes to reconstruct E. 88th Ave. just east of the I-76 NB ramps between Brighton Rd. and Hwy. 2 to improve traffic operations and accommodate all users. The project will also improve approximately 1,700 feet of Rosemary St., from 88th Ave. south to between 86th Ave. and 84th Ave. Project elements include:

- Between Brighton Rd. and Quince St., E. 88th Ave. will be expanded to a 100- to 110-foot-wide modified four-lane minor arterial with an eight-to-20-foot-wide raised median. The majority of this segment of 88th Ave. is currently two lanes.
- A detached eight-to-12-foot-wide multiuse path will be added along the north side of E. 88th Ave., separated from the road by a six-to-12-foot-wide buffer.
- Improvements at the E. 88th Ave.-Quince St. and E. 88th Ave.-Rosemary St. intersections include an extension of Quince St. to the south side of 88th Ave., as well as the construction of additional turn lanes and traffic signals
- An E. 88th Ave. bridge will span the O'Brian Canal, the new Quince St. extension, and the Union Pacific Railroad (UP). This new structure will terminate west of Rosemary St. on the east end and west of the O'Brian Canal on the west end. The new E. 88th Ave. bridge will have two travel lanes in each direction, as well as a sidewalk and multiuse path. Over the O'Brian Canal, the bridge deck will stand 16.5 feet over the elevation of the existing bridge deck (which will be removed). Over the UP, the bridge will have a

minimum clearance of 23 feet, four inches for maintenance and operation of the track. The bridge will extend to its highest point over the UP tracks (measured from tracks to top of the bridge deck), reaching an ultimate height of 32 feet. See pages 4-5 (Figures 6-7) in the enclosed survey report.

- Between Rosemary St. and SH 2, E. 88th Avenue will be reconstructed as an 11-to-13-foot-wide two-lane roadway with four-to-eight-foot-wide shoulders and a central 12-to-16-foot-wide two-way left turn lane.
- A six-to-12-foot-wide buffer will separate sidewalk and multiuse features. Stormwater drainage improvements will also be installed along the full extent of the Project.
- Improvements along Rosemary St. include the addition of a second southbound lane, extending approximately 1,700 feet from 88th Ave. south, and the addition of a second left turn lane northbound onto 88th Ave.

The project description and project diagrams (Figures 1-8) can be found on pages one to six of the attached survey report. Detailed project information will be included in the coordination of effects, which will occur separately.

Area of Potential Effects (APE)

Consistent with 36 CFR 800.16, CDOT defined the APE for this EA to incorporate those areas within which the Project could directly or indirectly affect historic or age-eligible properties. Age-eligible properties are defined as properties at least 45 years of age as of 2020 (constructed in 1975 or earlier), so as to meet the 50-year threshold set by the NRHP and allow a five-year buffer.

The APE for this project is two-tiered. The primary tier includes all properties that could be directly or indirectly affected by anticipated project work and generally extends along 88th Ave. from I-76 on the west to SH 2 on the east and from the (discontinuous) alignment of 87th Ave. on the south to the (discontinuous) alignment of 90th Ave. on the north, including all overlapping or intersecting parcels. The secondary tier of the APE comprises the noise study area, which extends outside the primary APE at various locations south of 87th Avenue to account for those properties that could potentially be subject to farther-reaching noise mitigation effects of the Project. The primary APE extends the length of the Project along 88th Ave., approximately 1.6 miles, and south approximately 1,770 feet along Rosemary St. See Figure 2 (page 3) and Appendix A of the enclosed survey report.

Identification and Survey Methods

Project cultural staff, who meet the Secretary of the Interior's Qualifications for architectural history, include Kathryn Plimpton, Architectural Historian and Project Manager at HDR, Alexandra Kosik, Architectural Historian at HDR, Diana Garnett, Architectural Historian at HDR as well as Barbara Stocklin-Steely, CDOT Region 1 Senior Historian, and Jamie Shapiro, CDOT Region 1 Assistant Historian. Based on the construction year data obtained from the Adams County Assessor's Office, cultural staff identified 61 properties within the two-tiered APE, including five linear resources, as historic or age-eligible resources. Age-eligible resources are defined as properties 45 years of age or older in 2020 (1975 or earlier). Cultural staff then field checked the buildings and structures on the 61 properties to verify assessor construction dates.

All properties within the primary APE containing age-eligible buildings were then evaluated for NRHP eligibility, with a survey form completed for each property (see enclosed OAHP forms). The 15 properties within the secondary noise study area APE were photographed and treated as eligible for the purposes of this study, but were not recorded on site forms (see Table 2). The 43 resources located within the primary APE were surveyed for NRHP eligibility using Colorado Office of Archaeology and Historic Preservation (OAHP) site forms (see Table 1 and Table 2). CDOT historians made multiple site visits throughout the evaluation process and conducted a site visit with SHPO Section 106 Compliance Manager Jason O'Brien on October 9, 2019.

In some cases, the period of significance is within a timeframe not yet fifty years old, for example the 88 Drive-In, 1971-1976. CDOT did not evaluate such properties for exceptional significance, but evaluated them under Criteria A-D, given that this Project will likely not be built immediately but in the coming years.

Determinations of Eligibility

Review of the OAHP Compass database indicated that the APE contains segments of four previously recorded resources: Denver Pacific/UP Railroad (5AM.459), officially eligible; BNSF Railroad (5AM.464), assumed eligible; O’Brian Canal (5AM.477), assumed eligible; and Burlington Ditch (5AM.465), officially eligible.

The historic resources survey for this EA identified a total of 63 cultural resources located within the two-tier APE: 43 historic architectural resources and 5 linear resources in the primary APE and 15 historic architectural resources in the secondary noise study area APE. OAHP site forms were completed for each resource located within the primary APE (enclosed).

Within the primary APE, CDOT determined six of the newly surveyed historic architectural resources to be NRHP-eligible (Table 1). Per OAHP guidelines regarding linear resources, Burlington Ditch (5AM.465.19) and 88th Ave. (5AM.3996.1) are assumed eligible. CDOT found the segments of these resources within the APE to be non-supporting of overall eligibility. CDOT found the segments of the other three linear resources to be supporting of the overall eligibility of those resources (Table 1). CDOT determined that the remaining 37 architectural properties within the primary are not eligible (Table 2). Within the secondary noise study area APE, CDOT is treating the 15 age-eligible properties as eligible for the purposes of this project (Table 3).

Survey results maps are provided in Appendix A of the enclosed survey report. Photographic tables for all cultural resources identified within the two-tiered APE are provided in Appendix B of the survey report and OAHP site forms for the 48 surveyed properties are provided in Appendix C.

Table 1. NRHP-Eligible Resources in the Primary APE

Site No.	Resource	Date	NRHP Eligibility
5AM.459 • 5AM.459.19	Denver Pacific/UP Railroad • Segment	1868–1870 • 1868	Officially Eligible (1996) • Supporting
5AM.464 • 5AM.464.20	BNSF Railroad • Segment	1881-1882 • 1882	Assumed Eligible • Supporting
5AM.477 • 5AM.477.15	O’Brian Canal • Segment	1910–1912 • 1910	Assumed Eligible • Supporting
5AM.465 • 5AM.465.19	Burlington Ditch • Segment	1888-1910 • 1888-1910	Officially Eligible (1988) • Non-supporting
5AM.3996 • 5AM.3996.1	88 th Avenue • Segment	c. 1889-1940 • c. 1889-1940	Assumed Eligible • Non-supporting
5AM.3958	88 Drive-In Theater, 8780 Rosemary St.	1971–1976	Eligible
5AM.3975	Irondale School, 8702 Rosemary St.	1937	Eligible
5AM.3976	Dwelling, 8705 Rosemary St.	1901	Eligible
5AM.3990	Wikiup Mobile Home Park, 6500 E. 88th Ave.	1964–65	Eligible
5AM.3983	Dwelling, 8686 Laurel Drive	1953	Eligible
5AM.3994	The Country Cottages Quonset Park, 8721 Xenia Street	c. 1955	Eligible

Table 2. Not Eligible Properties in the Primary APE

Site No.	Resource	Date	NRHP Eligibility
5AM.3959	8674 Laurel Dr.	1958	Not Eligible
5AM.3960	8721 Willow St.	1947	Not Eligible
5AM.3961	8701 Willow St.	1937 & 2017	Not Eligible
5AM.3962	8300 E 88th Ave., Buildings 1-4	1951, 1941, 1951, & 1951	Not Eligible
5AM.3963	8190 E 88 th Ave.	1964	Not Eligible
5AM.3964	8796 Ulster St.	1949	Not Eligible
5AM.3965	8741 Ulster St.	1955	Not Eligible
5AM.3966	8751 Ulster St.	1957	Not Eligible
5AM.3967	8771 Ulster St.	1959	Not Eligible
5AM.3968	8781 Ulster St.	1959	Not Eligible
5AM.3969	8796 Tamarac St.	1930	Not Eligible
5AM.3970	8790 Tamarac St.	1958	Not Eligible
5AM.3971	8750 Tamarac St.	1959	Not Eligible
5AM.3972	8740 Tamarac St.	1953	Not Eligible
5AM.3973	8730 Tamarac St.	1955	Not Eligible
5AM.3974	7840 E. 88th Ave	1952	Not Eligible
5AM.3977	7330 E. 88th Ave.	1941	Not Eligible
5AM.3978	6950 E. 88th Ave.	1954	Not Eligible
5AM.3979	8790 Laurel Dr.	1949	Not Eligible
5AM.3980	8760 Laurel Dr.	1941	Not Eligible
5AM.3981	8740 Laurel Dr.	1956	Not Eligible
5AM.3982	8730 & 8736 Laurel Dr.	1953	Not Eligible
5AM.3983	8686 Laurel dr.	1953	Not Eligible
5AM.3984	8681 Laurel Dr.	1955 & 1979	Not Eligible
5AM.3985	8701 Laurel Dr.	1952	Not Eligible
5AM.3986	8769 Laurel Dr.	1966	Not Eligible
5AM.3987	8777 Laurel Dr.	1949	Not Eligible

5AM.3988	8781 Laurel Dr.	1953	Not Eligible
5AM.3989	6840 E. 88th Ave.	1940	Not Eligible
5AM.3991	8790 Brighton Rd.	1934	Not Eligible
5AM.3992	8800 Brighton Rd.	1901	Not Eligible
5AM.3993	8810 88th Ave. J Burrs Mobile Home Park	c. 1963	Not Eligible
5AM.3995	8680 E. 88th Ave.	c. 1945	Not Eligible
5AM.4026	7520 E. 86th Ave.	1959	Not Eligible
5AM.4027	8496 Rosemary St.	c. 1960	Not Eligible
5AM.4028	8581 Rosemary St.	1901	Not Eligible
5AM.4029	8731 Willow St.	c. 1955	Not Eligible
5AM.4030	8740 Willow St.	1957	Not Eligible

Table 3. Properties in the Secondary (Noise Buffer) APE – Treated as NRHP-Eligible

Resource	Property Type	Date
8720 Tamarac Street	Residential	1966
8001 E. 87th Avenue	Residential	1952
8713 Ulster Street	Residential	1952
8703 Ulster Street	Residential	1953
8701 Ulster Street	Residential	1949
8690 Verbena Street*	Residential/Agricultural	1964
8730 Willow Street	Residential	1940
8696 Willow Street	Residential	1940
8635 E. 87th Avenue	Residential	1942
8699 87th Avenue	Residential	1953
8491 Rosemary Street	Residential	1952
8450 Rosemary Street	Commercial/Industrial	1972
8701 Brighton Road	Commercial/Industrial	c. 1960
8786 Brighton Road	Residential	1956
8780 Brighton Road	Residential	1952

*The private property at 8690 Verbena St. was not accessible during survey, and was therefore not photographed.

Mr. Steve Turner, AIA
88th Ave., I-76 to SH 2 EA, Eligibility and APE

December 10,
2019 Page 6

We are concurrently sending information on the APE and NRHP eligibility determinations delineated above to Commerce City and Adams County as consulting parties. We will keep you informed of any comments received from these consulting parties or through the public involvement process associated with this EA. We will coordinate the project's effects on historic properties with your office and with consulting parties separately.

At this time, we request your concurrence with the proposed APE and determinations of NRHP eligibility outlined above. If you require additional information, please contact CDOT Region 1 Assistant Historian Jamie Shapiro at (303) 512-4627 or jamie.shapiro@state.co.us.

Sincerely,



Jessica Myklebust
Region 1 Environmental Manager

Enclosures:

Historic Resources Survey for the 88th Avenue: 1-76 NB Interchange Ramps to Highway 2
Inventory Forms:

Architectural Inventory Form 1403: 5AM.3958-5AM.3995 & 5AM.4026-5AM.4030
Management Data/Linear Component Forms 1400/1418: 5AM.459.19, 5AM.464.20, 5AM.477.15,
5AM.465.19, & 5AM.3996.1



COLORADO
Department of Transportation

Region 1
Planning & Environmental
2829 W. Howard Place,
Denver, CO 80204

December 11, 2019

Steve Timms
Planning Manager
Commerce City
7887 E. 60th Avenue
Commerce City, CO 80022

Jill Jennings Golich
Community and Economic Development Director
Adams County
4430 S. Adams County Parkway
Brighton Colorado, 80601

**Re: Determinations of National Register of Historic Places Eligibility, 88th Ave., I-76 to Hwy. 2
Environmental Assessment, Commerce City, Adams County, CDOT Project STU M245-013,
SA#22285**

Dear Mr. Timms and Ms. Jennings Golich,

This letter and the enclosed materials constitute a request for comments on an Area of Potential Effects (APE) and determinations of National Register of Historic Places (NRHP) eligibility for the Commerce City project described above, 88th Ave., Interstate-76 (I-76) to Hwy. 2 Environmental Assessment (EA) in Adams County, Colorado (Project). Because the Project is federally funded, the Colorado Department of Transportation (CDOT) and the Federal Highway Administration (FHWA), in coordination with Commerce City, are conducting the EA. CDOT is playing the lead role for the Section 106 process (36 CFR 800), to consider the project's effects on historic resources. We are contacting you as consulting parties.

The project consultant, HDR, developed the Historic Resources Survey for 88th Avenue: I-76 NB Interchange Ramps to Highway 2 (survey report), which provides background on the project, lays out the APE, delineates the methodology to identify historic properties, provides a historic context for the project area, and identifies and evaluates the NRHP eligibility of historic and potentially historic resources within the APE. Along with the survey report, survey forms were completed for 48 resources within the APE. The survey report and forms are enclosed.

Project Description

The Project proposes to reconstruct E. 88th Ave. just east of the I-76 NB ramps between Brighton Rd. and Hwy. 2 to improve traffic operations and accommodate all users. The project will also improve approximately 1,700 feet of Rosemary St., from 88th Ave. south to between 86th Ave. and 84th Ave. Project elements include:

- Between Brighton Rd. and Quince St., E. 88th Ave. will be expanded to a 100- to 110-foot-wide modified four-lane minor arterial with an eight-to-20-foot-wide raised median. The majority of this segment of 88th Ave. is currently two lanes.
- A detached eight-to-12-foot-wide multiuse path will be added along the north side of E. 88th Ave., separated from the road by a six-to-12-foot-wide buffer.

- Improvements at the E. 88th Ave.-Quince St. and E. 88th Ave.-Rosemary St. intersections include an extension of Quince St. to the south side of 88th Ave., as well as the construction of additional turn lanes and traffic signals
- An E. 88th Ave. bridge will span the O'Brian Canal, the new Quince St. extension, and the Union Pacific Railroad (UP). This new structure will terminate west of Rosemary St. on the east end and west of the O'Brian Canal on the west end. The new E. 88th Ave. bridge will have two travel lanes in each direction, as well as a sidewalk and multiuse path. Over the O'Brian Canal, the bridge deck will stand 16.5 feet over the elevation of the existing bridge deck (which will be removed). Over the UP, the bridge will have a minimum clearance of 23 feet, four inches for maintenance and operation of the track. The bridge will extend to its highest point over the UP tracks (measured from tracks to top of the bridge deck), reaching an ultimate height of 32 feet. See pages 4-5 (Figures 6-7) in the enclosed survey report.
- Between Rosemary St. and SH 2, E. 88th Avenue will be reconstructed as an 11-to-13-foot-wide two-lane roadway with four-to-eight-foot-wide shoulders and a central 12-to-16-foot-wide two-way left turn lane.
- A six-to-12-foot-wide buffer will separate sidewalk and multiuse features. Stormwater drainage improvements will also be installed along the full extent of the Project.
- Improvements along Rosemary St. include the addition of a second southbound lane, extending approximately 1,700 feet from 88th Ave. south, and the addition of a second left turn lane northbound onto 88th Ave.

The project description and project diagrams (Figures 1-8) can be found on pages one to six of the attached survey report. Detailed project information will be included in the coordination of effects, which will occur separately.

Area of Potential Effects (APE)

Consistent with 36 CFR 800.16, CDOT defined the APE for this EA to incorporate those areas within which the Project could directly or indirectly affect historic or age-eligible properties. Age-eligible properties are defined as properties at least 45 years of age as of 2020 (constructed in 1975 or earlier), so as to meet the 50-year threshold set by the NRHP and allow a five-year buffer.

The APE for this project is two-tiered. The primary tier includes all properties that could be directly or indirectly affected by anticipated project work and generally extends along 88th Ave. from I-76 on the west to SH 2 on the east and from the (discontinuous) alignment of 87th Ave. on the south to the (discontinuous) alignment of 90th Ave. on the north, including all overlapping or intersecting parcels. The secondary tier of the APE comprises the noise study area, which extends outside the primary APE at various locations south of 87th Avenue to account for those properties that could potentially be subject to farther-reaching noise mitigation effects of the Project. The primary APE extends the length of the Project along 88th Ave., approximately 1.6 miles, and south approximately 1,770 feet along Rosemary St. See Figure 2 (page 3) and Appendix A of the enclosed survey report.

Identification and Survey Methods

Project cultural staff, who meet the Secretary of the Interior's Qualifications for architectural history, include Kathryn Plimpton, Architectural Historian and Project Manager at HDR, Alexandra Kosik, Architectural Historian at HDR, Diana Garnett, Architectural Historian at HDR as well as Barbara Stocklin-Steely, CDOT Region 1 Senior Historian, and Jamie Shapiro, CDOT Region 1 Assistant Historian. Based on the construction year data obtained from the Adams County Assessor's Office, cultural staff identified 61 properties within the two-tiered APE, including five linear resources, as historic or age-eligible resources. Age-eligible resources are defined as properties 45 years of age or older in 2020 (1975 or earlier). Cultural staff then field checked the buildings and structures on the 61 properties to verify assessor construction dates.

All properties within the primary APE containing age-eligible buildings were then evaluated for NRHP eligibility, with a survey form completed for each property (see enclosed OAHF forms). The 15 properties within the secondary noise study area APE were photographed and treated as eligible for the purposes of this study, but were

not recorded on site forms (see Table 2). The 43 resources located within the primary APE were surveyed for NRHP eligibility using Colorado Office of Archaeology and Historic Preservation (OAHP) site forms (see Table 1 and Table 2). CDOT historians made multiple site visits throughout the evaluation process and conducted a site visit with SHPO Section 106 Compliance Manager Jason O’Brien on October 9, 2019.

In some cases, the period of significance is within a timeframe not yet fifty years old, for example the 88 Drive-In, 1971-1976. CDOT did not evaluate such properties for exceptional significance, but evaluated them under Criteria A-D, given that this Project will likely not be built immediately but in the coming years.

Determinations of Eligibility

Review of the OAHP Compass database indicated that the APE contains segments of four previously recorded resources: Denver Pacific/UP Railroad (5AM.459), officially eligible; BNSF Railroad (5AM.464), assumed eligible; O’Brien Canal (5AM.477), assumed eligible; and Burlington Ditch (5AM.465), officially eligible.

The historic resources survey for this EA identified a total of 63 cultural resources located within the two-tier APE: 43 historic architectural resources and 5 linear resources in the primary APE and 15 historic architectural resources in the secondary noise study area APE. OAHP site forms were completed for each resource located within the primary APE (enclosed).

Within the primary APE, CDOT determined six of the newly surveyed historic architectural resources to be NRHP-eligible (Table 1). Per OAHP guidelines regarding linear resources, Burlington Ditch (5AM.465.19) and 88th Ave. (5AM.3996.1) are assumed eligible. CDOT found the segments of these resources within the APE to be non-supporting of overall eligibility. CDOT found the segments of the other three linear resources to be supporting of the overall eligibility of those resources (Table 1). CDOT determined that the remaining 37 architectural properties within the primary are not eligible (Table 2). Within the secondary noise study area APE, CDOT is treating the 15 age-eligible properties as eligible for the purposes of this project (Table 3).

Survey results maps are provided in Appendix A of the enclosed survey report. Photographic tables for all cultural resources identified within the two-tiered APE are provided in Appendix B of the survey report and OAHP site forms for the 48 surveyed properties are provided in Appendix C.

Table 1. NRHP-Eligible Resources in the Primary APE

Site No.	Resource	Date	NRHP Eligibility
5AM.459 • 5AM.459.19	Denver Pacific/UP Railroad • Segment	1868–1870 • 1868	Officially Eligible (1996) • Supporting
5AM.464 • 5AM.464.20	BNSF Railroad • Segment	1881-1882 • 1882	Assumed Eligible • Supporting
5AM.477 • 5AM.477.15	O’Brien Canal • Segment	1910–1912 • 1910	Assumed Eligible • Supporting
5AM.465 • 5AM.465.19	Burlington Ditch • Segment	1888-1910 • 1888-1910	Officially Eligible (1988) • Non-supporting
5AM.3996 • 5AM.3996.1	88 th Avenue • Segment	c. 1889-1940 • c. 1889-1940	Assumed Eligible • Non-supporting
5AM.3958	88 Drive-In Theater, 8780 Rosemary St.	1971–1976	Eligible
5AM.3975	Irondale School, 8702 Rosemary St.	1937	Eligible

5AM.3976	Dwelling, 8705 Rosemary St.	1901	Eligible
5AM.3990	Wikiup Mobile Home Park, 6500 E. 88th Ave.	1964–65	Eligible
5AM.3983	Dwelling, 8686 Laurel Drive	1953	Eligible
5AM.3994	The Country Cottages Quonset Park, 8721 Xenia Street	c. 1955	Eligible

Table 2. Not Eligible Properties in the Primary APE

Site No.	Resource	Date	NRHP Eligibility
5AM.3959	8674 Laurel Dr.	1958	Not Eligible
5AM.3960	8721 Willow St.	1947	Not Eligible
5AM.3961	8701 Willow St.	1937 & 2017	Not Eligible
5AM.3962	8300 E 88th Ave., Buildings 1-4	1951, 1941, 1951, & 1951	Not Eligible
5AM.3963	8190 E 88 th Ave.	1964	Not Eligible
5AM.3964	8796 Ulster St.	1949	Not Eligible
5AM.3965	8741 Ulster St.	1955	Not Eligible
5AM.3966	8751 Ulster St.	1957	Not Eligible
5AM.3967	8771 Ulster St.	1959	Not Eligible
5AM.3968	8781 Ulster St.	1959	Not Eligible
5AM.3969	8796 Tamarac St.	1930	Not Eligible
5AM.3970	8790 Tamarac St.	1958	Not Eligible
5AM.3971	8750 Tamarac St.	1959	Not Eligible
5AM.3972	8740 Tamarac St.	1953	Not Eligible
5AM.3973	8730 Tamarac St.	1955	Not Eligible
5AM.3974	7840 E. 88th Ave	1952	Not Eligible
5AM.3977	7330 E. 88th Ave.	1941	Not Eligible
5AM.3978	6950 E. 88th Ave.	1954	Not Eligible
5AM.3979	8790 Laurel Dr.	1949	Not Eligible
5AM.3980	8760 Laurel Dr.	1941	Not Eligible
5AM.3981	8740 Laurel Dr.	1956	Not Eligible
5AM.3982	8730 & 8736 Laurel Dr.	1953	Not Eligible
5AM.3983	8686 Laurel dr.	1953	Not Eligible

5AM.3984	8681 Laurel Dr.	1955 & 1979	Not Eligible
5AM.3985	8701 Laurel Dr.	1952	Not Eligible
5AM.3986	8769 Laurel Dr.	1966	Not Eligible
5AM.3987	8777 Laurel Dr.	1949	Not Eligible
5AM.3988	8781 Laurel Dr.	1953	Not Eligible
5AM.3989	6840 E. 88th Ave.	1940	Not Eligible
5AM.3991	8790 Brighton Rd.	1934	Not Eligible
5AM.3992	8800 Brighton Rd.	1901	Not Eligible
5AM.3993	8810 88th Ave. J Burrs Mobile Home Park	c. 1963	Not Eligible
5AM.3995	8680 E. 88th Ave.	c. 1945	Not Eligible
5AM.4026	7520 E. 86th Ave.	1959	Not Eligible
5AM.4027	8496 Rosemary St.	c. 1960	Not Eligible
5AM.4028	8581 Rosemary St.	1901	Not Eligible
5AM.4029	8731 Willow St.	c. 1955	Not Eligible
5AM.4030	8740 Willow St.	1957	Not Eligible

Table 3. Properties in the Secondary (Noise Buffer) APE – Treated as NRHP-Eligible

Resource	Property Type	Date
8720 Tamarac Street	Residential	1966
8001 E. 87th Avenue	Residential	1952
8713 Ulster Street	Residential	1952
8703 Ulster Street	Residential	1953
8701 Ulster Street	Residential	1949
8690 Verbena Street*	Residential/Agricultural	1964
8730 Willow Street	Residential	1940
8696 Willow Street	Residential	1940
8635 E. 87th Avenue	Residential	1942
8699 87th Avenue	Residential	1953
8491 Rosemary Street	Residential	1952
8450 Rosemary Street	Commercial/Industrial	1972

8701 Brighton Road	Commercial/Industrial	c. 1960
8786 Brighton Road	Residential	1956
8780 Brighton Road	Residential	1952

*The private property at 8690 Verbena St. was not accessible during survey, and was therefore not photographed.

Request

We are concurrently sending information on the APE and NRHP eligibility determinations delineated above to the State Historic Preservation Officer (SHPO) to request concurrence. If you have comments, please provide them by email or letter by Monday, January 13, 2020.

If you require additional information, please contact CDOT Region 1 Assistant Historian Jamie Shapiro at (303) 512-4627 or jamie.shapiro@state.co.us.

Sincerely,



for Jessica Myklebust
Region 1 Environmental Manager

Enclosures:

Historic Resources Survey for the 88th Avenue: 1-76 NB Interchange Ramps to Highway 2

Inventory Forms:

Architectural Inventory Form 1403: 5AM.3958-5AM.3995 & 5AM.4026-5AM.4030

Management Data/Linear Component Forms 1400/1418: 5AM.459.19, 5AM.464.20, 5AM.477.15, 5AM.465.19, & 5AM.3996.1



DEC 26 2019

HISTORY Colorado

Jessica Myklebust
Region 1 Environmental Manager
Colorado Department of Transportation
2829 W. Howard Place
Denver, CO 80204

Re: Determination of National Register of Historic Places Eligibility, 88th Ave., I-76 to Hwy. 2 Environmental Assessment, Commerce City, Adams County, CDOT Project STU M245-013, Sa #22285 (HC #76998)

Dear Ms. Myklebust:

Thank you for your correspondence dated December 10, 2019 and received on December 11, 2019 by our office regarding the consultation of the above-mentioned project under Section 106 of the National Historic Preservation Act (Section 106).

After review of the provided information, we do not object to the proposed Area of Potential Effects (APE) for the above project. We concur that segments 5AM.459.19, 5AM.464.20, and 5AM.477.15 are *supporting* to the overall eligibility of their resources, and 5AM.465.19 and 5AM.3996.1 are *non-supporting* to the overall eligibility of their resources.

We concur that 5AM.3958, 5AM.3975, 5AM.3976, 5AM.3990, 5AM.3983, and 5AM.3994 are *eligible* for the National Register of Historic Places (NRHP). Additionally, our office concurs that the following properties are *not eligible* for the NRHP:

- 5AM.3959
- 5AM.3960
- 5AM.3961
- 5AM.3962
- 5AM.3963
- 5AM.3964
- 5AM.3965
- 5AM.3966
- 5AM.3967
- 5AM.3968
- 5AM.3969
- 5AM.3970
- 5AM.3971
- 5AM.3972
- 5AM.3973
- 5AM.3974
- 5AM.3977
- 5AM.3978
- 5AM.3979
- 5AM.3980
- 5AM.3981
- 5AM.3982
- 5AM.3983
- 5AM.3984
- 5AM.3985
- 5AM.3986
- 5AM.3987
- 5AM.3988
- 5AM.3989
- 5AM.3991
- 5AM.3992
- 5AM.3993
- 5AM.3995
- 5AM.4026
- 5AM.4027
- 5AM.4028
- 5AM.4029
- 5AM.4030

Our office recognizes additional properties located within the noise buffer will be treated as eligible for the purposes of Section 106 and include:

- 8720 Tamarac St.
- 8001 E. 87th Ave.
- 8713 Ulster St.
- 8703 Ulster St.
- 8701 Ulster St.
- 8690 Verbena St.
- 8730 Willow St.
- 8696 Willow St.
- 8635 E. 87th Ave.
- 8699 87th Ave.
- 8491 Rosemary St.
- 8450 Rosemary St.
- 8701 Brighton Rd.
- 8786 Brighton Rd.
- 8780 Brighton Rd.

We look forward to continued consultation on the above project. If we may be of further assistance, please contact Jason O'Brien, Section 106 Compliance Manager, at (303) 866-2673 or Jason.obrien@state.co.us.

Sincerely,


Steve Turner, AIA
State Historic Preservation Officer



COLORADO

Department of Transportation

Region 1
Planning & Environmental
2829 W. Howard Place,
Denver, CO 80204

January 25, 2021

Mr. Steve Turner, AIA
State Historic Preservation Officer
History Colorado Center
1200 Broadway
Denver, CO 80203

Re: Section 106 Determinations of Effects, and Notification of Section 4(f) De Minimis Impact, 88th Avenue, I-76 NB Ramps to Highway 2 Environmental Assessment, City of Commerce City, Adams County CDOT Project No. STU M245-013, SA#22285 (HC#76998)

Dear Mr. Turner,

This letter and the enclosed attachments constitute a request for concurrence on Section 106 determinations of effects for the Commerce City project described above, 88th Ave., Interstate-76 (I-76) to Hwy. 2 Environmental Assessment (EA) in Adams County, Colorado (Project). Because the Project is federally funded, the Colorado Department of Transportation (CDOT) and the Federal Highway Administration (FHWA), in coordination with Commerce City, are conducting the EA. CDOT is playing the lead agency for the Section 106 process (36 CFR 800), to consider the project's effects on historic resources.

The project consultant, HDR, developed the Historic Properties Effects Report and Section 4(f) Analysis for 88th Avenue: I-76 NB Interchange Ramps to Highway 2 (effects report). This report provides background on the project, lays out the previously coordinated Area of Potential Effects (APE) and National Register of Historic Places (NRHP) eligibility determinations, and makes determinations of effects for each property within the APE.

Project Description

The project proposes to reconstruct E. 88th Ave. just east of the I-76 NB ramps between Brighton Rd. and Hwy. 2 to improve traffic operations and accommodate all users. The project will also improve approximately 1,700 feet of Rosemary St., from 88th Ave. south to between 86th Ave. and 84th Ave. Project elements include:

- Between Brighton Rd. and Quince St., E. 88th Ave. will be expanded to a 100- to 110-foot-wide modified four-lane minor arterial with an eight-to 20-foot-wide raised median. The typical section will include an attached five-to-six-foot-wide sidewalk on the south side of E. 88th Avenue, two 12- to 14-foot-wide travel lanes in each direction, and an eight- to 20-foot-wide raised median. The majority of this segment of 88th Ave. is currently two lanes.
- A detached eight-to 12-foot-wide multiuse path will be added along the north side of E. 88th Ave., separated from the road by a six-to 12-foot-wide buffer.

- Improvements at the E. 88th Ave.-Quince St. and E. 88th Ave.-Rosemary St. intersections include an extension of Quince St. to the south side of 88th Ave., as well as the construction of additional turn lanes and traffic signal improvements.
- A new E. 88th Ave. single-span bridge with a widened typical-section will replace the existing bridge over the O'Brian Canal. The typical-section will have two travel lanes in each direction and the sidewalk and multiuse path features described above. The bridge will be 104 feet wide and 77 feet long. The structure is described on pages 50-60 of the enclosed effects report.
- Between Rosemary St. and SH 2, E. 88th Avenue will be reconstructed as an approximately 85-to-100-foot-wide modified local industrial collector. The typical section will include one 11-to 13-foot-wide travel lane with an additional four-to eight-foot-wide shoulder in each direction, a 12-to 16-foot-wide two-way left-turn lane at the center, and a five-to six-foot-wide sidewalk on the south side of E. 88th Avenue. The majority of this segment of 88th Ave. is currently two lanes.
- A six-to 12-foot-wide buffer will separate the sidewalk and multiuse features. Stormwater drainage improvements will also be installed along the full extent of the Project.
- Improvements along Rosemary St. include the addition of a second southbound lane, extending approximately 1,700 feet from 88th Ave. south, and the addition of a second left turn lane northbound onto 88th Ave.

The project description and project diagrams (Figures 1-8) can be found in the enclosed effects report. The 15% set of plans for the EA improvements is also attached.

Section 106 Background and Area of Potential Effects (APE)

Previous consultation with your office on December 10, 2019, defined the project's APE to contain a primary APE and a secondary noise study area APE. Within the primary APE, CDOT surveyed 43 historic architectural resources and 5 linear resources. Six of the historic architectural properties were determined NRHP *eligible* and three segments of linear resources were determined *supporting* of the assumed overall eligibility of the resource. The remaining 37 architectural properties within the primary APE were determined *not eligible* and two linear resources were determined *non-supporting*. Within the secondary noise study area APE, 15 properties were *treated as eligible* for the purposes of this project. Your office concurred with these findings on December 26, 2019. Prior correspondence with your office, and one comment received from Adams County, a consulting party, are included with the report as Appendix A.

Determination of Effects

The enclosed Effects Report includes detailed information and illustrations regarding the effects of the proposed EA improvements on all surveyed resources. A brief summary of CDOT's effects findings are delineated below.

No Historic Properties Affected

As noted above, CDOT previously determined 37 properties at least 45 years of age within the APE to be individually NRHP *not eligible*. CDOT determines that the Proposed Action (PA) results in a *no historic properties affected* determination for these properties, shown below:

5AM.3959	8674 Laurel Dr.	5AM.3980	8760 Laurel Dr.
5AM.3960	8721 Willow St.	5AM.3981	8740 Laurel Dr.
5AM.3961	8701 Willow St.	5AM.3982	8730 & 8736 Laurel Dr.
5AM.3962	8300 E. 88th Ave. #1-4	5AM.398	8681 Laurel Dr.
5AM.3963	8190 E. 88th Ave.	5AM.398	8701 Laurel Dr.
5AM.3964	8796 Ulster St.	5AM.3986	8769 Laurel Dr.
5AM.3965	8741 Ulster St.	5AM.3987	8777 Laurel Dr.
5AM.3966	8751 Ulster St.	5AM.3988	8781 Laurel Dr.
5AM.3967	8771 Ulster St.	5AM.3989	6840 E. 88th Ave.
5AM.3968	8781 Ulster St.	5AM.3991	8790 Brighton Rd.
5AM.3969	8796 Tamarac St.	5AM.3992	8800 Brighton Rd.
5AM.3970	8790 Tamarac St.	5AM.3993	8810 88th Ave.
5AM.3971	8750 Tamarac St.	5AM.3995	8680 E. 88th Ave.
5AM.3972	8740 Tamarac St.	5AM.4026	7520 E. 86th Ave.
5AM.3973	8730 Tamarac St.	5AM.4027	8496 Rosemary St.
5AM.3974	7840 E. 88th Ave.	5AM.4028	8581 Rosemary St.
5AM.3977	7330 E. 88th Ave.	5AM.4029	8731 Willow St.
5AM.3978	6950 E. 88th Ave.	5AM.4030	8740 Willow St.
5AM.3979	8790 Laurel Dr.		

No Adverse Effects

Fifteen properties were treated as eligible for this undertaking due to the potential for noise impacts and are located in the secondary APE. CDOT determines that the proposed Project will result in *no adverse effects* to these resources, as described in Table 1 below and in the enclosed effects report.

Table 1. Section 106 Determination of Effects for Noise Tier Properties Treated as Eligible

Address	Construction Date	Noise Analysis Conducted	Effects Determination
8720 Tamarac Street	1966	No	No Adverse Effect
8001 E. 87th Avenue	1952	Yes	No Adverse Effect
8713 Ulster Street	1952	Yes	No Adverse Effect
8703 Ulster Street	1953	Yes	No Adverse Effect
8701 Ulster Street	1949	Yes	No Adverse Effect
8690 Verbena Street	1964	Yes	No Adverse Effect
8730 Willow Street	1940	No	No Adverse Effect
8696 Willow Street	1940	No	No Adverse Effect
8635 E. 87th Avenue	1942	Yes	No Adverse Effect
8699 87th Avenue	1953	No	No Adverse Effect
8491 Rosemary Street	1952	No	No Adverse Effect
8450 Rosemary Street	1972	Yes	No Adverse Effect
8701 Brighton Road	c. 1960	Yes	No Adverse Effect
8786 Brighton Road	1956	No	No Adverse Effect
8780 Brighton Road	1952	No	No Adverse Effect

Six properties were determined officially eligible for NRHP listing or are linear properties assumed to be overall NRHP eligible, located within the primary APE. CDOT determines that the proposed action will result in *no adverse effects* to these 11 resources, as described in Table 2 and in the enclosed effects report.

Table 2. Section 106 Determination of Effects for NRHP Eligible Properties

Site Number	Site Name	Property Type	NRHP Eligibility Criteria	Effects Determination
5AM.3958	88 Drive-In Theatre	Site	A, C	No Adverse Effect
5AM.3975	Irondale School	Site	A	No Adverse Effect
5AM.3976	8705 Rosemary Street	Site	C	No Adverse Effect
5AM.3983	8686 Laurel Drive	Site	C	No Adverse Effect
5AM.3990	Wikiup Mobile Home Park	Site	A, C	No Adverse Effect
5AM.3994	Country Cottages Quonset Park	Site	C	No Adverse Effect
5AM.459	Denver Pacific/Union Pacific Railroad	Linear	A, B	No Adverse Effect
5AM.464	BNSF Railroad	Linear	A	No Adverse Effect
5AM.465	Burlington Ditch	Linear	A, C	No Adverse Effect
5AM.477	O'Brian Canal	Linear	A, C	No Adverse Effect
5AM.3996	88th Avenue	Linear	A	No Adverse Effect

Notification of Section 4(f) De Minimis Impact

Right-of-way purchases and/or easements may be required for six of the NRHP eligible properties within the APE, as delineated in Table 3 below. Section 4(f) of the U.S. Department of Transportation (USDOT) Act of 1966 requires special consideration when a potential project requires use of park and recreation lands, wildlife and waterfowl refuges, and/or *historic sites* is identified during transportation project development. The law is implemented by the FHWA through the regulation 23 CFR 774.

Section 4(f) *de minimis* impact involves the use of a Section 4(f) property that is generally minor in nature, results in a determination of no adverse effects or no historic properties affected under the Section 106 process. The SHPO has been notified of the FHWA's intent to make a *de minimis* impact determination, and the FHWA has considered the views of any consulting parties participating in the Section 106 consultation. Implementation of the proposed Project has been determined to result in *no adverse effects* to the following six properties.

Table 3. NRHP Eligible Properties Included in a De Minimis Section 4(f) Determination

Site Number	Site Name	Property Type	Effects Determination
5AM.3958	88 Drive-In Theatre	Site	No Adverse Effect
5AM.3975	Irondale School	Site	No Adverse Effect
5AM.3976	8705 Rosemary Street	Site	No Adverse Effect
5AM.3990	Wikiup Mobile Home Park	Site	No Adverse Effect
5AM.465	Burlington Ditch	Linear	No Adverse Effect
5AM.477	O'Brian Canal	Linear	No Adverse Effect

Section 4(f) Transportation Facilities Exception

The finding of *no adverse effects* under Section 106 for the following linear resources reflect CDOT's finding that this project will not "alter directly or indirectly any of the characteristics of [the] historic properties that qualify the properties for listing in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association" as described in 36 CFR § 800.5(a)(1). Based on this finding, FHWA may apply the Historic Transportation Facility exception for such facilities with a new use proposed by a transportation project. FHWA intends to apply the Historic Transportation Facilities Exception to the following three properties:


Site Number	Site Name	Property Type	Effects Determination
5AM.459	Denver Pacific/Union Pacific Railroad	Linear	No Adverse Effect
5AM.464	BNFS/Santa Fe Railroad	Linear	No Adverse Effect
5AM.3996	88 th Avenue	Linear	No Adverse Effect

Summary

CDOT is concurrently providing information on the US 85, I-76 to 124th Avenue EA effects findings to Commerce City and Adams County as consulting parties. We will keep you informed of any comments received from these consulting parties.

At this time, we request your concurrence with CDOT's determinations of effects per the Section 106 process, and receipt of notification regarding Section 4(f) *De Minimis* as described above. If you have any questions or require additional information, please contact CDOT Region 1 Assistant Historian Jamie Shapiro at (303) 817-4349 or jamie.shapiro@state.co.us.

Sincerely,



Danny Herrmann (Jan 25, 2021 15:21 MST)

Vanessa Henderson
Region 1 Environmental Manager

Enclosures: Historic Resources Determination of Effects and Historic Section 4(f) Report (CDOT 2021)
Historic Resources Eligibility and APE Report (for reference)
15% Set of Project Plans



COLORADO

Department of Transportation

Region 1
Planning & Environmental
2829 W. Howard Place,
Denver, CO 80204

January 25, 2021

Steve Timms
Planning Manager
Commerce City
7887 E. 60th Avenue
Commerce City, CO 80022

Jill Jennings Golich
Community and Economic Development Director
Adams County
4430 S. Adams County Parkway
Brighton Colorado, 80601

Re: Section 106 Determinations of Effects, 88th Avenue, I-76 NB Ramps to Highway 2 Environmental Assessment, City of Commerce City, Adams County CDOT Project No. STU M245-013, SA#22285

Dear Mr. Timms and Ms. Jennings Golich,

This letter and the enclosed attachments constitute a request for comments on Section 106 determinations of effects for the Commerce City project described above, 88th Ave., Interstate-76 (I-76) to Hwy. 2 Environmental Assessment (EA) in Adams County, Colorado (Project). Because the Project is federally funded, the Colorado Department of Transportation (CDOT) and the Federal Highway Administration (FHWA), in coordination with Commerce City, are conducting the EA. CDOT is playing the lead agency for the Section 106 process (36 CFR 800), to consider the project's effects on historic resources. We are contacting you as consulting parties.

The project consultant, HDR, developed the Historic Properties Effects Report and Section 4(f) Analysis for 88th Avenue: I-76 NB Interchange Ramps to Highway 2 (effects report). This report provides background on the project, lays out the previously coordinated Area of Potential Effects (APE) and National Register of Historic Places (NRHP) eligibility determinations, and makes determinations of effects for each property within the APE.

Project Description

The project proposes to reconstruct E. 88th Ave. just east of the I-76 NB ramps between Brighton Rd. and Hwy. 2 to improve traffic operations and accommodate all users. The project will also improve approximately 1,700 feet of Rosemary St., from 88th Ave. south to between 86th Ave. and 84th Ave. Project elements include:

- Between Brighton Rd. and Quince St., E. 88th Ave. will be expanded to a 100- to 110-foot-wide modified four-lane minor arterial with an eight-to 20-foot-wide raised median. The typical section will include an attached five-to-six-foot-wide sidewalk on the south side of E. 88th Avenue, two 12-

to 14-foot-wide travel lanes in each direction, and an eight- to 20-foot-wide raised median. The majority of this segment of 88th Ave. is currently two lanes.

- A detached eight-to 12-foot-wide multiuse path will be added along the north side of E. 88th Ave., separated from the road by a six-to 12-foot-wide buffer.
- Improvements at the E. 88th Ave.-Quince St. and E. 88th Ave.-Rosemary St. intersections include an extension of Quince St. to the south side of 88th Ave., as well as the construction of additional turn lanes and traffic signal improvements.
- A new E. 88th Ave. single-span bridge with a widened typical-section will replace the existing bridge over the O'Brian Canal. The typical-section will have two travel lanes in each direction and the sidewalk and multiuse path features described above. The bridge will be 104 feet wide and 77 feet long. The structure is described on pages 50-60 of the enclosed effects report.
- Between Rosemary St. and SH 2, E. 88th Avenue will be reconstructed as an approximately 85-to-100-foot-wide modified local industrial collector. The typical section will include one 11-to 13-foot-wide travel lane with an additional four-to eight-foot-wide shoulder in each direction, a 12-to 16-foot-wide two-way left-turn lane at the center, and a five-to six-foot-wide sidewalk on the south side of E. 88th Avenue. The majority of this segment of 88th Ave. is currently two lanes.
- A six-to 12-foot-wide buffer will separate the sidewalk and multiuse features. Stormwater drainage improvements will also be installed along the full extent of the Project.
- Improvements along Rosemary St. include the addition of a second southbound lane, extending approximately 1,700 feet from 88th Ave. south, and the addition of a second left turn lane northbound onto 88th Ave.

The project description and project diagrams (Figures 1-8) can be found in the enclosed effects report. The 15% set of plans for the EA improvements is also attached.

Section 106 Background and Area of Potential Effects (APE)

Previous consultation with the State Historic Preservation Officer (SHPO) and your offices on December 10, 2019, defined the project's APE to contain a primary APE and a secondary noise study area APE. Within the primary APE, CDOT surveyed 43 historic architectural resources and 5 linear resources. Six of the historic architectural properties were determined NRHP *eligible* and three segments of linear resources were determined *supporting* of the assumed overall eligibility of the resource. The remaining 37 architectural properties within the primary APE were determined *not eligible* and two linear resources were determined *non-supporting*. Within the secondary noise study area APE, 15 properties were *treated as eligible* for the purposes of this project. The SHPO concurred with these findings on December 26, 2019. Prior correspondence with the SHPO and one comment received from Adams County, a consulting party, are included with the report as Appendix A.

Determination of Effects

The enclosed Effects Report includes detailed information and illustrations regarding the effects of the proposed EA improvements on all surveyed resources. A brief summary of CDOT's effects findings are delineated below.

No Historic Properties Affected

As noted above, CDOT previously determined 37 properties at least 45 years of age within the APE to be individually NRHP *not eligible*. CDOT determines that the Proposed Action (PA) results in a *no historic properties affected* determination for these properties, shown below:

5AM.3959	8674 Laurel Dr.	5AM.3980	8760 Laurel Dr.
5AM.3960	8721 Willow St.	5AM.3981	8740 Laurel Dr.
5AM.3961	8701 Willow St.	5AM.3982	8730 & 8736 Laurel Dr.
5AM.3962	8300 E. 88th Ave. #1-4	5AM.398	8681 Laurel Dr.
5AM.3963	8190 E. 88th Ave.	5AM.398	8701 Laurel Dr.
5AM.3964	8796 Ulster St.	5AM.3986	8769 Laurel Dr.
5AM.3965	8741 Ulster St.	5AM.3987	8777 Laurel Dr.
5AM.3966	8751 Ulster St.	5AM.3988	8781 Laurel Dr.
5AM.3967	8771 Ulster St.	5AM.3989	6840 E. 88th Ave.
5AM.3968	8781 Ulster St.	5AM.3991	8790 Brighton Rd.
5AM.3969	8796 Tamarac St.	5AM.3992	8800 Brighton Rd.
5AM.3970	8790 Tamarac St.	5AM.3993	8810 88th Ave.
5AM.3971	8750 Tamarac St.	5AM.3995	8680 E. 88th Ave.
5AM.3972	8740 Tamarac St.	5AM.4026	7520 E. 86th Ave.
5AM.3973	8730 Tamarac St.	5AM.4027	8496 Rosemary St.
5AM.3974	7840 E. 88th Ave.	5AM.4028	8581 Rosemary St.
5AM.3977	7330 E. 88th Ave.	5AM.4029	8731 Willow St.
5AM.3978	6950 E. 88th Ave.	5AM.4030	8740 Willow St.
5AM.3979	8790 Laurel Dr.		

No Adverse Effects

Fifteen properties were treated as eligible for this undertaking due to the potential for noise impacts and are located in the secondary APE. CDOT determines that the proposed Project will result in *no adverse effects* to these resources, as described in Table 1 below and in the enclosed effects report.

Table 1. Section 106 Determination of Effects for Noise Tier Properties Treated as Eligible

Address	Construction Date	Noise Analysis Conducted	Effects Determination
8720 Tamarac Street	1966	No	No Adverse Effect
8001 E. 87th Avenue	1952	Yes	No Adverse Effect
8713 Ulster Street	1952	Yes	No Adverse Effect
8703 Ulster Street	1953	Yes	No Adverse Effect
8701 Ulster Street	1949	Yes	No Adverse Effect
8690 Verbena Street	1964	Yes	No Adverse Effect
8730 Willow Street	1940	No	No Adverse Effect
8696 Willow Street	1940	No	No Adverse Effect
8635 E. 87th Avenue	1942	Yes	No Adverse Effect
8699 87th Avenue	1953	No	No Adverse Effect
8491 Rosemary Street	1952	No	No Adverse Effect

8450 Rosemary Street	1972	Yes	No Adverse Effect
8701 Brighton Road	c. 1960	Yes	No Adverse Effect
8786 Brighton Road	1956	No	No Adverse Effect
8780 Brighton Road	1952	No	No Adverse Effect

Six properties were determined officially eligible for NRHP listing or are linear properties assumed to be overall NRHP eligible, located within the primary APE. CDOT determines that the proposed action will result in *no adverse effects* to these 11 resources, as described in Table 2 and in the enclosed effects report.

Table 2. Section 106 Determination of Effects for NRHP Eligible Properties


Site Number	Site Name	Property Type	NRHP Eligibility Criteria	Effects Determination
5AM.3958	88 Drive-In Theatre	Site	A, C	No Adverse Effect
5AM.3975	Irondale School	Site	A	No Adverse Effect
5AM.3976	8705 Rosemary Street	Site	C	No Adverse Effect
5AM.3983	8686 Laurel Drive	Site	C	No Adverse Effect
5AM.3990	Wikiup Mobile Home Park	Site	A, C	No Adverse Effect
5AM.3994	Country Cottages Quonset Park	Site	C	No Adverse Effect
5AM.459	Denver Pacific/Union Pacific Railroad	Linear	A, B	No Adverse Effect
5AM.464	BNSF Railroad	Linear	A	No Adverse Effect
5AM.465	Burlington Ditch	Linear	A, C	No Adverse Effect
5AM.477	O'Brian Canal	Linear	A, C	No Adverse Effect
5AM.3996	88th Avenue	Linear	A	No Adverse Effect

Request

CDOT is concurrently providing information on the US 85, I-76 to 124th Avenue EA effects findings to the SHPO to request concurrence. If you have any comments on CDOT's findings of effects, please provide them by email by Wednesday, February 24, 2021.

If you have any questions or require additional information, please contact CDOT Region 1 Assistant Historian Jamie Shapiro at (303) 817-4349 or jamie.shapiro@state.co.us.

Sincerely,



 Danny Herrmann (Jan 25, 2021 15:20 MST)

Vanessa Henderson
 Region 1 Environmental Manager

Enclosures: Historic Resources Determination of Effects and Historic Section 4(f) Report (CDOT 2021)
 Historic Resources Effects Report (for reference)
 15% Set of Project Plans



Ms. Vanessa Henderson
Region 1 Environmental Manager
Colorado Department of Transportation
2829 W. Howard Place
Denver, Colorado 80204

RE: 88th Avenue, I-76 NB Ramps to Highway 2 Environmental Assessment
Commerce City, Adams County, Colorado
CDOT Project No. STU M245-013, SA#22285
History Colorado No. 76998

Dear Ms. Henderson:

Thank you for your correspondence dated January 25, 2021, which our office received on January 26, 2021, regarding the review of the aforementioned project under Section 106 of the National Historic Preservation Act of 1966, as amended (54 USC § 306108), and its implementing regulations, 36 CFR Part 800.

We have reviewed all documentation submitted for this project. As you know, in a letter dated December 26, 2019, our office agreed the defined area of potential effects (APE) was appropriate for the undertaking and concurred with the recommendations of eligibility for the various properties identified within the APE. We concur with your assessments of effects as follows.

No Historic Properties Affected

We concur with your assessments the undertaking as described will result in *no historic properties affected* regarding the following thirty-seven (37) properties as all have been determined *not eligible* for inclusion in the National Register of Historic Places:

5AM.3959 - 8674 Laurel Dr.	5AM.3977 - 7330 E. 88th Ave.
5AM.3960 - 8721 Willow St.	5AM.3978 - 6950 E. 88th Ave.
5AM.3961 - 8701 Willow St.	5AM.3979 - 8790 Laurel Dr.
5AM.3962 - 8300 E. 88th Ave. #1-4	5AM.3980 - 8760 Laurel Dr.
5AM.3963 - 8190 E. 88th Ave.	5AM.3981 - 8740 Laurel Dr.
5AM.3964 - 8796 Ulster St.	5AM.3982 - 8730 & 8736 Laurel Dr.
5AM.3965 - 8741 Ulster St.	5AM.3984 - 8681 Laurel Dr.
5AM.3966 - 8751 Ulster St.	5AM.3985 - 8701 Laurel Dr.
5AM.3967 - 8771 Ulster St.	5AM.3986 - 8769 Laurel Dr.
5AM.3968 - 8781 Ulster St.	5AM.3987 - 8777 Laurel Dr.
5AM.3969 - 8796 Tamarac St.	5AM.3988 - 8781 Laurel Dr.
5AM.3970 - 8790 Tamarac St.	5AM.3989 - 6840 E. 88th Ave.
5AM.3971 - 8750 Tamarac St.	5AM.3991 - 8790 Brighton Rd.
5AM.3972 - 8740 Tamarac St.	5AM.3992 - 8800 Brighton Rd.
5AM.3973 - 8730 Tamarac St.	5AM.3993 - 8810 88th Ave.
5AM.3974 - 7840 E. 88th Ave.	5AM.3995 - 8680 E. 88th Ave.



5AM.4026 - 7520 E. 86th Ave.
5AM.4027 - 8496 Rosemary St.
5AM.4028 - 8581 Rosemary St.

5AM.4029 - 8731 Willow St.
5AM.4030 - 8740 Willow St.

No Adverse Effects

We concur the undertaking will result in *no adverse effect* to the fifteen (15) properties that were treated as eligible for this undertaking due to the potential for noise impacts. Those fifteen properties are located within the secondary APE.

We concur the undertaking will also result in *no adverse effect* to the following eleven (11) properties located within the defined APE. We provide comments below regarding two (2) of these properties.

5AM.459 - Denver Pacific/Union Pacific
Railroad
5AM.464 - BNSF Railroad
5AM.465 - Burlington Ditch
5AM.3958 - 88 Drive-In Theatre

5AM.3975 - Irondale School
5AM.3976 - 8705 Rosemary Street
5AM.3983 - 8686 Laurel Drive
5AM.3994 - Country Cottages Quonset Park
5AM.3996 - 88th Avenue

5AM.477 - O'Brian Canal – Based on the submitted report, the undertaking proposes to replace the bridge that carries 88th Avenue over the O'Brian Canal. The new bridge will be substantially wider than the existing bridge. Though the canal will be affected by the introduction of the new bridge, it is our opinion the described construction plans will adequately *minimize* those effects and such should result in *no adverse effect* to the Canal. However, it is noted the project plans are currently at 15% completion. Should those plans need substantial changes, such might result in an adverse effect to the linear resource. Please contact our office should significant modifications become necessary in the course of project planning.

5AM.3990 - Wikiup Mobile Home Park – The report indicated that noise barriers might be constructed along 88th Avenue to reduce sound intrusion within the Wikiup Mobile Home Park caused by increased traffic along the roadway. We understand residents of the park will largely determine whether they wish to accept construction of the noise barriers. Thus, it is currently unknown whether the barriers will be installed. The report specifically stated: “While the proposed noise barrier will represent a new visual element along the north end of the property, it will not affect any characteristics that qualify the property for NRHP listing.” And “[c]ollectively and individually, these effects will not directly or indirectly alter any characteristics of Wikiup Mobile Home Park (5AM.3990) that qualify it for NRHP eligibility in a manner that diminishes any aspect of its historic integrity.” We concur with these assessments and that the proposed noise barriers will result in *no adverse effect* to the Wikiup Mobile Home Park, even if such is constructed at the residents’ request.

Section 4(f)

Lastly, to comply with Section 4(f) of the U.S. Department of Transportation Act of 1966, as amended, and its implementing regulations 23 CFR Part 774, we acknowledge CDOT may use a *de minimis* finding for the following six (6) properties:



5AM.465 - Burlington Ditch
5AM.477 - O'Brian Canal
5AM.3958 - 88 Drive-In Theatre

5AM.3975 - Irondale School
5AM.3976 - 8705 Rosemary Street
5AM.3990 - Wikiup Mobile Home Park

Additionally, CDOT may use a *Transportation Facilities Exception* under Section 4(f) for the following three (3) properties:

5AM.459 - Denver Pacific/Union Pacific Railroad
5AM.464 - BNSF Railroad
5AM.3996 - 88th Avenue

Should unidentified archaeological resources be discovered in the course of the project, work must be interrupted until the resources have been evaluated in terms of the National Register eligibility criteria (36 CFR §60.4) in consultation with our office pursuant to 36 CFR §800.13. Also, should the consulted-upon scope of the work change, please contact our office for continued consultation under Section 106 of the National Historic Preservation Act.

We request being involved in the consultation process with the local government, which as stipulated in 36 CFR §800.3 is required to be notified of the undertaking, and with other consulting parties. Additional information provided by the local government or consulting parties might cause our office to re-evaluate our eligibility and potential effect findings. Please note that our compliance letter does not end the 30-day review period provided to other consulting parties.

Thank you for the opportunity to comment. If we may be of further assistance, please contact Mitchell K. Schaefer, Section 106 Compliance Manager, at (303) 866-2673 or mitchell.schaefer@state.co.us.

Sincerely,

Steve Turner, AIA
State Historic Preservation Officer

ST/mks

Attachment C. Native American Consultation

Pawnee Nation of Oklahoma

Thursday, August 01, 2019

Daniel Jepson
US Department of Transportation
Colorado Division
12300 West Dakota Avenue
Suite 180
Lakewood, Colorado 80228

**RE: Section 106 Consultation and Review on:
88th Avenue, I-76 to State Highway 2
Adams County, Colorado**

Dear Mr. Jepson,

The Pawnee Nation Office of Historic Preservation has received the information and materials requested for our Section 106 Review and Consultation. Consultation with the Pawnee Nation is required by Section 106 of the National Historic Preservation Act of 1966 (NHPA), and 36 CFR Part 800.

Given the information provided, you are hereby notified that the proposed project/s will not adversely affect the cultural landscape of the Pawnee Nation. Therefore, in accordance with 36 CFR 800.4(d) (1), you may proceed with your proposed projects. **However, please be advised that additional undiscovered properties could be encountered, and they must be immediately reported to us under both the NHPA and NAGPRA regulations.**

This information is provided to assist you in complying with 36 CFR Part 800 for Section 106 Consultation procedures. Should you have questions, please do not hesitate to contact me at jreed@pawneenation.org or by phone at 918-762-2180 ext 220. Thank you for your time and consideration.

Sincerely,
Matt Reed
Historic Preservation Officer
Pawnee Nation of Oklahoma

Historic Preservation Office
Matt Reed
Phone: 918.762.2180 Fax: 918.762.3662
E-mail: jreed@pawneenation.org
P.O. Box 470
Pawnee, Oklahoma 74058

----- Forwarded message -----

From: **Jepson - CDOT, Daniel** <daniel.jepson@state.co.us>
Date: Mon, Aug 12, 2019 at 7:54 AM
Subject: Northern Cheyenne Tribe Response, 88th Ave., I-76 - SH 2 EA (22285)
To: Gibson, Stephanie P <stephanie.gibson@dot.gov>, Jessica Myklebust - CDOT <jessica.myklebust@state.co.us>

Stephanie, Jessica -

Following is the email response received from the Northern Cheyenne Tribe THPO for the project referenced above. The tribe is not interested in consulting status -

Dan

Dan Jepson, Senior Archaeologist
Cultural Resources Section Manager
Environmental Programs Branch



2829 W. Howard Pl., Denver, CO 80204
(303) 757-9631
daniel.jepson@state.co.us | www.codot.gov/programs/environmental

----- Forwarded message -----

From: **Teanna Limpy** <teanna.limpy@cheyennenation.com>
Date: Fri, Aug 9, 2019 at 3:50 PM
Subject: 88th Ave Comments-NCTHPO
To: <daniel.jepson@state.co.us>

Mr. Jepson,

I apologize for the late response regarding the 88th Ave., I-76 to State Highway 2 Environmental assessment letter dated June 25, 19, and received in our office on July 1, 19. I have reviewed the associated project provided with the letter and do not have any immediate concerns and/or comments. This office has determined that this project will have 'NO EFFECT'. Your undertaking may proceed as planned. As always, thank you for consulting with our office.

Respectfully,

Teanna Limpy, THPO
Tribal Historic Preservation Office
Northern Cheyenne Tribe
14 E. Medicine Lodge Drive
P.O. Box 128
Lame Deer, MT. 59043
Work: (406) 477-4839/4838
Cell: (406) 850-7691

COMANCHE NATION



Federal Highway Administration
Attn: Ms. Stephanie Gibson
12300 W. Dakota Ave., Suite #180
Colorado 80228

October 17, 2019

Re: Request for Section 106 Consultation, 88th Ave., I-76 to Highway 2
Environmental Assessment, Adams County, Colorado

Dear Ms. Gibson:

In response to your request, the above reference project has been reviewed by staff of this office to identify areas that may potentially contain prehistoric or historic archeological materials. The location of your project has been cross referenced with the Comanche Nation site files, where an indication of "**No Properties**" have been identified. (IAW 36 CFR 800.4(d)(1)).

Please contact this office at (580) 595-9960/9618) if you require additional information on this project.

This review is performed in order to identify and preserve the Comanche Nation and State cultural heritage, in conjunction with the State Historic Preservation Office.

Regards

Comanche Nation Historic Preservation Office
Theodore E. Villicana , Technician
#6 SW "D" Avenue, Suite C
Lawton, OK. 73502