

1.0 INTRODUCTION

The U.S. General Services Administration (GSA) is proposing to construct a new office building in Denver, Colorado to house the Federal Bureau of Investigation (FBI) Denver Division Office through a lease construction agreement. FBI's Denver Division experienced unexpected and rapid growth after the September 11, 2001 terrorist attacks. The FBI must now accommodate new programs and security features that affect the overall square footage and design characteristics of new FBI facilities. Many of these programs involve extensive computer information technology equipment and secure file storage and all programs require a significant increase in personnel and program space. In addition, new security requirements for FBI facilities have been instituted, including a 100-foot setback from adjacent streets. A new consolidated location will provide the FBI with sufficient space to meet its current and long-term space requirements and will allow for full compliance with the Interagency Security Committee guidelines.

The National Environmental Policy Act (NEPA) of 1969, as amended, requires that Federal agencies consider the environmental impacts of their actions and decisions, and to use all practicable means and measures to protect environmental values. To ensure the public's interests are protected, proposed actions involving Federal resources may not take place until all NEPA and agency requirements for environmental analysis are met. To meet the requirements of NEPA, the U.S. General Service Administration (GSA) is preparing an Environmental Assessment (EA) on for Proposed New Office Building Construction for the Federal Bureau of Investigation Denver Division Office, located in Denver, Colorado. The EA will provide sufficient information on potential environmental effects of the proposed action and its alternatives to enable GSA to make an informed decision leading either to a Finding of No Significant Impact (FONSI) or a determination that an Environmental Impact Statement (EIS) is required.

1.1 PURPOSE AND NEED FOR ACTION

The FBI's mission has grown since September 11, 2001. The Bureau has been developing and instituting new programs, acquiring a large amount of new computer equipment and file storage space, and hiring additional staff. Currently, the FBI is located in 120,169 square feet of space across three different government-owned locations in the Denver metropolitan area. Two office

sites are located in downtown Denver, and the third is located at the Denver Federal Center, as shown in Figure 1-1. In the downtown Byron G. Rogers Federal Building, the FBI occupies five floors that are not contiguous. This distribution of functions in different locations throughout the metro area hinders the ability of the FBI to operate efficiently. None of the buildings currently housing the FBI can provide the additional space the Bureau requires. Nor can the downtown Denver buildings be reconfigured to provide the 100-foot set-back from adjacent streets to comply with current security requirement.

The FBI's growth requires a new and larger facility in Denver that consolidates Bureau functions in one location that meets security requirements. The proposed building is also consistent with the national policy to build new free-standing FBI facilities in most major cities.

1.2 ALTERNATIVES CONSIDERED

NEPA requires the Federal government to use all practicable means and measures to protect environmental values. Therefore, NEPA makes environmental protection a part of the mandate of every Federal agency and department. GSA uses a multi-disciplinary approach to consider the environmental, social, and historical impacts when expanding properties or building new facilities. This approach helps the agency decide whether to undertake the proposed action after considering all reasonable alternatives, including the alternative of taking no action.

Building locations within the Denver Central Business District were not considered as alternatives because the FBI's requirement of a 100-foot security setback from adjacent streets is not compatible with buildings constructed in the Central Business District. Discussions were held with City and County of Denver officials and they indicated that location of the facility outside of the Central Business District is acceptable as long as the agency location remains in the City and County of Denver. Building locations outside of the City and County of Denver were not considered, as these locations would not be compatible with GSA's location policy under Executive Orders 12072 and 13006. (GSA 2006b)

1.2.1 Proposed Action

The proposed site location is depicted in relation to existing FBI offices on Figure 1-1, and is shown in more detail on Figure 1-2. The proposed action will be located on Parcel 18A in Section 28, Township 3 South, Range 67 West (S28, T3S, R67W). The proposed facility will be

on approximately 9.8 acres bounded by the Quebec Square Regional Retail Center on the west, Ulster Street on the east, 36th Avenue to the north and 35th Avenue to the south. The proposed site is located in the Stapleton Redevelopment Area (SRA), formerly part of Stapleton International Airport (SIA). Currently, the site is owned by the City and County of Denver (Denver) and is vacant and zoned for re-development for all uses, except residential.

The FBI staff located in Denver is projected to increase from 231 current employees to 318. The proposed 175,155-square-foot facility will be built under a lease construction agreement with a development company that will be chosen under a competitive bid process. The proposed facility includes office space, computer and information technology facilities, secure file and evidence storage, secure interview rooms, and other facility support spaces. In addition, the facility will include 175 inside parking spaces in a secured detached parking garage, and a surface parking lot with 165 parking spaces. Outside of a 100-foot setback from the main building, there will be a guard facility, a visitor screening facility, and 25 visitor parking spaces. There will also be rooftop building antennas and an eight-foot fence surrounding the entire site designed in accordance with SRA design requirements.

Because the project development team has not yet been chosen, a proposed facility design is not yet available, but the design will be consistent with design requirements of the SRA master plan. It is anticipated that the main building will be four or five stories tall with 25,000 to 40,000 square feet of space per floor.

The proposed new facility will meet the FBI's current and long-term needs for additional space and new security-related design, while increasing the efficiency and effectiveness of agency work by consolidating all functions in one location. The facility will provide a modern, efficient, technically up-to-date, and secure facility to adequately accommodate the FBI's expanded security, space, and operational needs. The proposed facility is also consistent with the national policy to build new free-standing FBI facilities in most major cities.

In addition, the selected location provides convenient access to transportation, including public ground transportation, and to Denver International Airport and other urban amenities, while continuing to be located within the City and County of Denver.

1.2.2 No Action

The No Action Alternative would result in the FBI continuing to be housed in the current three buildings in the Denver area. Under this alternative, the FBI would remain in buildings that do not meet current security requirements and that do not have space available for expansion of FBI operational needs.

2.0 SITE ENVIRONMENT AND POTENTIAL CONSEQUENCES

The following sections describe the environmental setting of the site for the proposed FBI Denver Division Office (the Site) and include the potential environmental impacts that could reasonably be expected to occur as a result of the proposed project. This section describes the existing physical environment, as well as biological and cultural resources.

2.1 PHYSICAL ENVIRONMENT

The physical environment includes the air, geology, soil, water resources, and man-made items. The following subsections include discussion of each of these issues.

2.1.1 Air Quality

Air quality may be described by assessing the concentrations of various pollutants present in the atmosphere. In Colorado, air quality is regulated by the Colorado Air Pollution Prevention and Control Act (Colorado Revised Statutes, Title 25, Article 7, Air Quality Control).

National Ambient Air Quality Standards (NAAQS)

NAAQS have been established by the U.S. Environmental Protection Agency (EPA) for seven criteria air pollutants. These include:

- carbon monoxide (CO)
- lead (Pb)
- nitrogen dioxide (NO₂)
- particulate matter equal to or less than 10 microns in diameter (PM₁₀)
- particulate matter equal to or less than 2.5 microns in diameter (PM_{2.5})

- ozone (O₃)
- sulfur oxides (SO_x)

NAAQS represent the maximum levels of background pollutants that are considered safe, with an adequate margin of safety to protect public health and welfare. Short-term standards (1-, 8-, and 24-hour periods) have been established for pollutants contributing to acute health effects, while long-term standards (annual averages) have been established for pollutants contributing to chronic health effects. The Clean Air Act (CAA) Amendments of 1990 places responsibility on individual states to achieve and maintain NAAQS.

The Construction Permit Unit, located within the Stationary Sources Program of the Colorado Department of Public Health and Environment (CDPHE), issues permits to commercial and industrial air pollution sources in order to ensure compliance with Air Quality Control Commission regulations. All sources of air emissions in Colorado are required to submit an Air Pollutant Emission Notice (APEN) and obtain a Construction Permit, unless they are specifically exempted by the provisions of the Air Quality Control Commission's Regulation No.3 (CDPHE 2007a).

In general, a construction permit is required for a facility with uncontrolled actual emissions of any criteria pollutant equal to or greater than the amounts listed in Table 2-1.

In the course of building design, construction operations will be inventoried to identify sources of air emissions and a calculation made of the expected uncontrolled actual emissions. An APEN must be submitted when uncontrolled actual emissions exceed emission thresholds (CDPHE 2007b).

Asbestos

Asbestos had been identified on the Site and asbestos remediation has been completed. The remediation was conducted under the Colorado Air Quality Control Commission's Regulation No. 8, Part B, Emission Standards for Asbestos. The remediation at the Site has yet to receive approval from CDPHE. If the remediation was not complete, asbestos could potentially become an air quality hazard during construction. Notification to the state by the construction contractor and permits from CDPHE may be required if friable asbestos is observed during construction.

Criteria of Evaluation for Air Quality

The Proposed Action or an alternative may have the potential for a significant impact on air quality if it would:

- a) Violate air quality standards or contribute substantially to an existing or projected air quality violation.
- b) Conflict with or obstruct implementation of an applicable air quality plan.
- c) Result in a substantial, cumulative net increase in any of the criteria pollutants for which the region is in nonattainment under applicable Federal or State ambient air quality standard.
- d) Expose sensitive receptors to substantial pollutant concentrations.
- e) Create objectionable odors affecting a substantial number of people.

Impacts to Air Quality

No Action

The No Action alternative would have no additional negative impact on air quality in the Denver metropolitan area. The No Action Alternative would result in FBI personnel continuing to be housed in three buildings, two in the central business district and one at the Federal Center, that presumably will continue to operate in the same manner, and thus continue to contribute to air pollution in the Denver metropolitan area at the current levels.

Proposed Action

The Proposed Action is expected to have a minor negative impact on ambient air quality during construction. Use of construction equipment would result in emissions of CO, NO₂, various hydrocarbons, particulate matter and small amounts of SO₂. However, the effects of these emissions would be highly localized, short-term, and would not violate any NAAQS, and would occur whether the site is developed for the FBI Denver Division Office or some other purpose. There would be no significant long-term effects. The location of the Proposed Action could result in a positive long-term impact if FBI employees utilize the current and proposed alternative transportation options that will be available near the facility due to decreased emissions from personal automobiles. In addition, if energy conservation and alternative energy

generation, such as solar panels, are included as a design features additional positive long-term impact to air quality could be realized.

2.1.2 Soils and Geology

Unconsolidated Quaternary sediments (collectively referred to as alluvium) overlie the claystone, sandstone, and siltstone bedrock of the Denver Formation. The alluvium is the most significant geologic unit because the first groundwater encountered is within this unit and may provide pathways for groundwater migration. The alluvium (including wind-blown [eolian] deposits) consists primarily of silty clays and silty sands mixed with small quartzite pebbles. The thickness of the alluvial material in the former SIA area ranges from a few feet in areas where bedrock approaches the ground surface to over 80-feet in areas where ancient streams incised into the Denver Formation (HLA 1999).

Criteria of Evaluation for Soils and Geology

The Proposed Action or an alternative may have the potential for a significant impact on geology and soils if it would:

- a) Result in the loss of a unique geologic feature.
- b) Cause substantial soil erosion or loss of topsoil.
- c) Result in the loss of availability of a known mineral resource of value to the region and State.

Impacts on Soil and Geology

No Action

The No Action Alternative would have no impact on geology or soils in the Denver area. The No Action Alternative would result in FBI personnel continuing to be housed in the three current buildings, two in the central business district and one at the Federal Center. There is no potential loss of valuable mineral resources or unique geologic features associated with the No Action alternative.

Proposed Action

Because the site is currently devoid of vegetation and highly disturbed, construction at the site would not involve extensive vegetation clearing and substantial disturbance to soils. There is no

potential for the loss of valuable mineral resources at the site and there are no unique geologic features present. Consequently, the construction of the facility would have no impact on the geology at the site.

2.1.3 Topography

The topography at the Site is level with a gradual slope to the north east. However, much of the Site appears to have been scraped, graded and excavated and possibly backfilled. In general, the current excavation activity has lowered the topographic surface in many areas of the Site (Figure 2-1) with the result being that drainage will be retained on the Site. This excavation work is ongoing, and future drainage patterns may be altered depending on the final grading, and backfilling.

Criteria of Evaluation for Topography

The Proposed Action or an alternative may have the potential for a significant impact on landforms if it would alter site topography to the detriment of adjacent land uses.

Impacts to Topography

No Action

The No Action Alternative would have no impact on landforms or topography. The No Action Alternative would result in FBI personnel continuing to be housed in the three current buildings, two in the central business district and one at the Federal Center. Existing impacts to topography from the existing buildings would continue, but they do not pose a known detriment to adjacent land uses.

Proposed Action

The SRA contains no landforms that would constrain or be impacted by construction, operation or maintenance of the proposed new FBI facility. Alteration of the Site due to construction would include the addition of fill material for grading and structural purposes, which would be kept from affecting adjacent properties through the implementation of standard construction Best Management Practices (BMPs), such as the use of silt fences. A Soil Erosion and Sediment Control Plan would be devised and implemented to ensure this. Stormwater management would

be incorporated into the design of the facility and would be consistent with the area management of stormwater. Therefore, no impacts would be expected to adjacent properties.

2.1.4 Natural Hazards

The Denver Regional Council of Governments (DRCOG) has identified thirteen natural hazards that present risk to one or more of the nine-county Denver Regions (DRCOG 2003). These natural hazards will be discussed in a regional and site specific context below. These hazards have been assessed in terms of frequency (occurrence rates per year) and severity, using the following definition:

- Catastrophic: Multiple fatalities, complete shutdown of critical facilities for 30 days or more, and more that 50 percent of property in affected area destroyed or receiving major damage.
- Extensive: Fatalities and severe injury or illness, complete shutdown of critical facilities for 14 days or less, and more that 25 percent of property in affected area destroyed or receiving major damage.
- Serious: Injuries or illness not resulting in disability, complete shutdown of critical facilities for 7 days or less, and more that 10 percent of property in affected area destroyed or receiving major damage.
- Minor: First aid injuries, complete shutdown of critical facilities for 1 days or less, and no more than 1 percent of property in affected area destroyed or receiving major damage.

Avalanche

Avalanches have a very low level of occurrence in the nine-county Denver region in general (estimated at once in more than 1,000 years) and are not a significant threat to the Site, given its location 17 miles east of the Rocky Mountains on gently sloping land.

Drought

Drought differs from other natural hazards in that it usually has a slow onset, can affect a very large area, and does not cause much structural damage. Drought can affect agriculture when soil moisture is unable to support crops. Drought can cause below normal surface and groundwater supplies. If water deficit begins to affect the health, quality of life or the economy, drought begins to affect a region's socioeconomic well being. As the population in the region continues to grow, so to will the demand for water, requiring an effective regional water strategy

to manage water resources. DRCOG estimates the frequency of a drought hazard in Denver County as high (more than once every 10 years) with a severity rating of extensive.

Earthquake

Geologic studies indicate there are about 100 potentially active faults in Colorado and more than 400 earthquake tremors of magnitude 2.5 or higher have occurred in Colorado since 1870. Because the occurrence of earthquakes is relatively infrequent in Colorado and the historical earthquake record is limited, it is not possible to accurately estimate the timing or location of future dangerous earthquakes in Colorado. Relative to other western states, Colorado's earthquake hazard is higher than Kansas or Oklahoma, but lower than Utah, Nevada and California (DRCOG 2003). DRCOG estimates the frequency of an earthquake hazard in Denver County is low (once every 100 to 1,000-years) with a severity rating of extensive.

Flood

Flood hazard areas in the nine-county Denver region are located on the floodplains of all rivers, streams, lakes, wetlands, and closed depressions. DRCOG estimates the frequency of a flooding hazard in Denver County is high (more than once every 10-years) with a severity rating of extensive. It is noted that the Site is $\frac{1}{4}$ - $\frac{1}{2}$ mile southwest and west of the 100-year and 500-year flood plains for Sand Creek, see Figure 2-2. This suggests that flooding is an unlikely natural hazard for the Site.

Hail

Hail damage to crops, property, and vehicles is significant in Colorado. For example, on July 11, 1990, Denver suffered a hailstorm that produced tennis ball sized hail and resulted in approximately \$600 million in damages (Doesken 1994). DRCOG estimates the frequency of a hail hazard in Denver County is high (more than once every ten years) with a severity rating of extensive.

Heat Wave

DRCOG defines a heat wave as temperatures that hover 10 degrees or more above the average high temperature for the region and last for several weeks. Most heat disorders occur because an individual has been overexposed to heat or has over exercised for his or her age

and physical condition, or because of poor air quality. DRCOG estimates the frequency of a heat wave hazard in Denver County is medium (once every 10 to 100-years) with a severity rating of extensive.

Landslide

The most vulnerable areas for landslides are the mountain corridors and the urbanized areas along the Rocky Mountain Front Range, especially after heavy rainfall or rapid snow melt. Landslides have a low level of occurrence in the nine-county Denver region in general (estimated at once in every 100 to 1000-years) and are not a significant threat to the Site, given its location 17 miles east of the Rocky Mountains on gently sloping land.

Land Subsidence

DRCOG defines the term land subsidence as any failures in the ground that cause collapses in the earth's surface. Land subsidence can be caused by natural processes, such as the dissolving of limestone underground, an earthquake, or volcanic activity. It can also be the result of human actions such as withdrawal of groundwater, oil and gas, or underground mining. In Colorado, the type of subsidence of greatest concern is the settling of the ground over abandoned mine workings. The DRCOG estimate the frequency of a land subsidence hazard in Denver County is low (once every 100 to 1000-years) with a severity rating of minor.

Winter Storm/Freezing

The most likely cause of a shutdown event in Denver is a severe winter storm. The average seasonal snowfall in Denver (1971-2000) is 61.7 inches (NOAA NWS 2007a). Individual storms can produce large snowfall amounts, for example, 31.8 inches on 18 March 2003. Blizzards can force the closure of interstate highways, businesses, schools, and airports. Early or late season snow storms produce heavy wet snows that break tree limbs and down power lines. Along with snowfall, Denver can also experience extremely cold temperatures, dropping 25 degrees below zero or lower with the wind chill factor. The threat of severe winter storms including cold temperatures and heavy snow, is well documented and expected in Denver. DRCOG estimates the frequency of a winter storm hazard in Denver County is medium (once every 10 to 100-years) with a severity rating of serious.

Severe Storm/Wind

The two main causes of high wind in Denver are the pressure differences between strong low pressure and colder high pressure systems, and windstorms known as Chinooks. Chinook winds occur when a strong, deep flow of air crosses the Rockies from west to east. Air is forced up by the high peaks of the Continental Divide and then races down the eastern side to the plains below. Chinook winds frequently reach hurricane force (maximum sustained surface wind is 64 knots (74 miles-per-hour or 119 kilometers-per-hour) or more) and have caused damage to homes and automobiles along the Front Range foothills. DRCOG estimates the frequency of a severe wind hazard in Denver County is medium (once every 10 to 100-years) with a severity rating of serious.

Thunderstorm/Lightning

Lightning is Colorado's most dangerous weather hazard. Since the late 1980s, more people have been killed or injured by lightning than by any other weather-related phenomena in Colorado (DRCOG 2003). The highest number of deaths and injuries occur in open areas and in, or near, water. DRCOG estimates the frequency of a lightening hazard in Denver County is high (more than once every 10 years) with a severity rating of serious.

Tornado

Tornadoes have been reported 9 months of the year, most occurring between mid-May and mid-August and between 1 pm and 9 pm (NOAA NWS 2007b). They also occur statewide, but most develop in eastern Colorado to the east of Interstate 25. The last tornado death in Colorado occurred on June 27, 1960 in Sedgwick County. The most well known tornado outbreak occurred in metro Denver on June 15, 1988. Five tornadoes resulted in seven injuries and damage in excess of \$15 million. DRCOG estimates the frequency of a tornado hazard in Denver County is medium (once every 10 to 100 years) with a severity rating of serious.

Wildland Fire Hazard

Forest fire is a significant natural hazard in the Denver region, especially in the forested foothills and mountains. Rangeland and grassland fires also present risk, especially in semi-urban and rural areas. The DRCOG estimate the frequency of a wildland fire hazard in Denver County is

low (once every 100 to 1000 years) with a severity rating of serious. Wildland fires are not a significant threat to the Site, given its urban setting in east Denver.

Criteria of Evaluation for Natural Hazards

An alternative may have the potential for a natural hazard risk if it would:

- a) Place structures within a 100-year flood hazard area, which would impede or redirect flood flows.
- b) Conflict with local ordinances or building codes intended to protect against damage or loss due to severe weather conditions.
- c) Conflict with building codes intended to protect against damage or loss due to seismic hazards.
- d) Expose people or structures to a significant risk of loss, injury, or death from a natural hazard, including flooding as a result of the failure of a levee or dam.

Impacts of Natural Hazards

No Action

The No Action Alternative would continue to have existing risks from natural hazards. The No Action Alternative would result in FBI personnel continuing to be housed in the three current buildings, two in the central business district and one at the Federal Center. Impacts from severe weather are the most notable risks. The FBI office at the Denver Federal Center would have a slightly lower risk from tornado than the central Denver locations due to its location closer to the foothills.

Proposed Action

The location of the Proposed Action would be subject to the same hazards as would exist for the No Action alternative, with a possibly slightly higher risk from tornado due to its more eastern location than the existing buildings. There is no known historic mining activity at, or in the vicinity, of the Site, thus subsidence from abandoned mining is not a threat. In addition, the site is not located in a 100-year or 500-year floodplain and will not be at threat during flooding conditions. The design and construction of the Proposed Action would follow the guidelines set forth in EO 11988 and all applicable Federal development regulations and local building codes

designed to protect against foreseeable natural hazards, thus the Proposed Action would have no impact from natural hazards.

2.1.5 Water Resources

The Clean Water Act (CWA) of 1972 is the primary federal law that protects the nation's waters, including lakes, rivers, aquifers, wetlands, and coastal areas. The primary objective of the CWA is to restore and maintain the integrity of the nation's waters. Water resources include groundwater, surface water, wetlands, and floodplains located within the proposed project areas. Groundwater resources are located in underground aquifers. Surface water resources include lakes, ponds, rivers, and streams. Wetland resources can be associated with groundwater and surface water. The 1987, U.S. Army Corps of Engineers (USACE) Wetland Delineation Manual specifies three criteria for the identification of wetlands: hydrophytic vegetation, hydric soil, and positive indicators of wetland hydrology (USACE 1987).

Wetland

There is no evidence of any areas of wetland on the Site. The Site is ¼-mile to ½-mile south west and west of designated wetland, see Figure 2-2.

Surface Water

There is no evidence of any surface water feature on the Site. Sand Creek runs approximately ½-mile north-east of the Site, and Westerly Creek approximately 1-mile to the east, see Figure 2-2. However, it is noted that much of the Site appears to have been scraped, graded and excavated and possibly backfilled. In general, the current excavation activity has lowered the topographic surface in many areas of the Site, with the result being that currently precipitation will be retained on the Site. This excavation work is ongoing, and future drainage patterns may be altered depending on the final grading, and backfilling. During construction an Erosion Control Plan to mitigate discharges of soil to surface water will be required to meet the requirements of the Colorado Water Quality Control Act Basic Standards and Methodologies for Surface Water (5 CCR § 1002.31). The proposed design of the future FBI Denver Division office building will accommodate surface/storm water runoff and drainage.

Groundwater

Groundwater beneath the Site occurs in the heterogeneous, unconfined, unconsolidated alluvial aquifer. The water table occurs at approximately 25-feet below ground surface (bgs).

Groundwater flow direction is reported generally to the north-east and locally to the north-west (Waterstone 2007). It is understood that the form of deed to be issued by the City and County of Denver for the Site is expected to contain the following standard restrictions that limit groundwater-related use and activity on the Site (Forest City 2007):

- A reservation of underground water rights to the City and County of Denver
- A prohibition on the drilling or placement of a water well.

These restrictions are primarily due to the elevated concentrations of nitrates that exist beneath the former SIA at concentrations above the Stapleton Numeric Criteria/ Master Facilities Development Agreement (SNC/MFDA) standards. Nitrates are not known to present a human health risk unless the groundwater is ingested. Groundwater will not be used as a water supply source to the Site.

Criteria of Evaluation for Water Resources

The Proposed Action or an alternative may have the potential for a significant impact on water resources if it would:

- a) Violate water quality standards or otherwise substantially degrade water quality.
- b) Substantially alter the existing drainage pattern of the area, including the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would exceed the capacity of stormwater systems and result in flooding on or off site.
- c) Violate stormwater regulations or be non-compliant with stormwater design criteria as applicable.
- d) Substantially deplete groundwater supply, affect groundwater quality adversely, or interfere with the recharge of a sole-source aquifer.
- e) Alter a jurisdictional wetland without prior coordination and permitting by the USACE.

Impacts on Water Resources

No Action

The No Action Alternative would have no impact on water quality or supply in the Denver area. The No Action Alternative would result in FBI personnel continuing to be housed in the three current buildings, two in the central business district and one at the Federal Center. Presumably the FBI operations would remain the same and any current impacts on water resources are expected to remain constant.

Proposed Action

Development of the proposed FBI Denver Division Office would have no impact on water resources in the area. The current drainage pattern of the site will be altered during construction and the final drainage configuration of the site will be consistent with area-wide drainage plans. During construction, an Erosion Control Plan to mitigate discharges of soil to surface water will be required to meet the requirements of the Colorado Water Quality Control Act Basic Standards and Methodologies for Surface Water (5 CCR § 1002.31). The proposed design of the future FBI Denver Division office building will accommodate surface/storm water runoff and drainage.

2.2 MAN-MADE ENVIRONMENT AND INFRASTRUCTURE

Prior to 1929, the general area was primarily used by ranchers and farmers for livestock grazing and dairy cattle raising operations. The airport was opened on October 17, 1929, as Denver Municipal Airport. The airport was expanded in 1940s, 1960s and 1980. SIA was closed in 1995 replaced by the newly built Denver International Airport.

In the 1937 aerial photograph (Waterstone 2007), the Site appears to be in use for agriculture. At some time in the 1950s until the airport was decommissioned, the Site was developed with two aircraft maintenance hangars in the central and eastern part of the Site and all or part of four buildings to the west of the Site (Figure 2-3 and Figure 2-4). The buildings are identified on the Sanborn Fire Insurance Map (Waterstone 207) as follows:

- Former Building 5 – Hangar No.5
- Former Building 6 – Hangar No.6

- Former Building 16 – FAA Communications Office and Weather Center
- Former Building 17 – Boiler House and Engine Room
- Former Building 19 – FAA W. Ho.
- Former Building 20 – not identified

The former buildings on the site have been demolished. Asbestos remediation to remove asbestos contaminated soil has been completed. The Site is generally highly disturbed with little vegetation. There are currently no structures, roads or other improvements visible on the Site other than temporary haul roads used during excavation and removal of asbestos contaminated soils.

The future infrastructure including roads, storm water drainage, utilities, water, and sewer will be constructed to accommodate the planned future development of the site for office use. Open space and recreational areas are planned for the SRA approximately ¼-mile northeast and ¼-mile southeast of the Site (Figure 2-5). The open space and recreational areas will not be impacted by the Proposed Action.

Criteria of Evaluation for Man-made Environment and Infrastructure

The Proposed Action or an alternative may have the potential for a significant impact on man-made environment and infrastructure if it would:

- a) Directly exceed the capacity of the utility supply and distribution systems.
- b) Induce population growth in the service area substantially above projections for future utility demands.
- c) Require extensions of utilities (electric, gas, telecommunications, water mains, sewer, etc.) well beyond existing service areas or require the acquisition of new rights-of-way.
- d) Directly or indirectly affect recreational facilities and levels of service in the project area.

Impacts to Man-made Environment and Infrastructure

No Action

The No Action Alternative would have no impact on man-made environment or infrastructure. The No Action Alternative would result in FBI personnel continuing to be housed in the three current buildings, two in the central business district and one at the Federal Center. The

infrastructure to serve these buildings is established and is not adversely impacted by current FBI operations.

Proposed Action

The Proposed Action would have no impact on man-made environment or infrastructure. The proposed FBI Denver Division Office is consistent with zoning for the site. New infrastructure specifically designed and constructed with the capacity to accommodate this type and scale of office development will be present, and thus the Proposed Action is not expected to negatively impact existing infrastructure and public services. In addition, the proposed facility would not impact any recreational area or open space in the region.

2.3 BIOLOGICAL RESOURCES

Biological resources include living, native, or naturalized plant and animal species and the habitats within which they occur. These resources are divided into three major categories:

- Vegetation
- Wildlife
- Threatened, endangered, or sensitive species.

2.3.1 Vegetation

Based on a site visit on June 28, 2007, the majority of the Site appears to have been scraped, graded and excavated and possibly backfilled (Figure 2-1). The Site is generally highly disturbed with little vegetation. Since the 1950s, the Site has been used as part of an airport taxiway and covered mostly by two maintenance hangars.

2.3.2 Wildlife

As per the discussion of vegetation above, because the Site was covered with concrete and buildings for most of the last 80 years, the Site has no pre-existing wildlife. During the site visit on June 28, 2007, no wildlife was observed.

2.3.3 Wetlands and Drainages

Asbestos remediation and soil removal on the site has lowered the topographic surface in many areas of the Site, with the result being that under current conditions precipitation will be retained

on the Site. This excavation work is ongoing, and future drainage patterns will be altered and are dependent on the final grading of the Site. Sand Creek runs approximately ½-mile north-east of the Site, and Westerly Creek approximately 1-mile to the east (Figure 2-2). There is no evidence of any surface water features or areas of wetland on the Site. The Site is ¼-mile to ½-mile south west and west of designated wetland (Figure 2-2). During the site visit on June 28, 2007, it was observed that storm drains were being installed along the future 35th Avenue that from the southern boundary of the site. Upon construction, the Site will be serviced by city drainage.

2.3.4 Threatened and Endangered Species

According to the US Fish and Wildlife Service (USFWS) the following species are listed as threatened or endangered in Denver County, see Table 2-2 (USFWS 2007):

- Interior Least Tern
- Pallid Sturgeon
- Piping Plover
- Preble's Meadow Jumping Mouse
- Ute Ladies'-tresses
- Whooping Crane

There is no designated critical habitat for these species within the county. As per the discussion of wildlife above, because the Site was covered with concrete and buildings for most of the last 80 years, the Site has no pre-existing wildlife. During the site visit on June 28, 2007, no wildlife was observed. No threatened or endangered species, or the appropriate habitat, were identified at the future FBI Denver Division Office building site.

Criteria of Evaluation for Biological Resources

A project alternative may have the potential for a significant impact on vegetation and wildlife if it would:

- a) Cause a loss of individuals or occupied habitat of a Federally-listed endangered, threatened, or rare wildlife or plant species.
- b) Substantially block or disrupt wildlife migration or travel corridors.

- c) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local or regional conservation plan.
- d) Cause the loss, displacement, isolation, or significant (irreparable or irreversible) alteration to natural, native vegetation communities and/or wildlife.

Impacts to Biological Resources

No Action

The No Action Alternative would have no impact on biological resources. The No Action Alternative would result in FBI personnel continuing to be housed in the three current buildings, two in the central business district and one at the Federal Center. No vegetation, wildlife, or critical habitat, including wetlands, are impacted by current FBI operations nor are any expected.

Proposed Action

Because no vegetation, wildlife, or critical habitat, including wetlands, exists at the Site, the Proposed Action would have no impact on biological resources.

2.4 CULTURAL RESOURCES

Section 106 of the National Historic Preservation Act requires federal agencies to define and document the Area of Potential Effects (APE). In the Section 106 process, the federal agency, or a representative of the federal agency, must identify historic properties and determine the effect of the proposed project on them. Thus, the reason for defining an APE is to determine the area in which historic properties must be identified, so that effects to any identified properties can, in turn, be assessed. Historic properties are buildings, structures, objects, sites, and districts with significance in American history, architecture, archaeology, engineering, and culture. These properties may be listed in or eligible for the National Register of Historic Places.

According to 36 CFR 800.16(d), the APE is the geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of historic properties, if such properties exist. The APE is influenced by the scale and nature of the undertaking and may be different for different kinds of effects caused by the undertaking.

A literature review and computer file search was performed for a 1-mile radius around the Site (Section 28, T3S, R67W) through the Colorado State Historic Preservation Office (SHPO),

Colorado Office of Archaeology and Historic Preservation (OAHP) COMPASS database, and Government Land Office (GLO) records website. The complete Class I Cultural Resources Literature Review for the site is included as Appendix C.

GLO patent records indicate that the majority of the property was originally held privately by several individuals as well as the Kansas and Union Pacific Railway Companies. The property was claimed in the initial pre-1900 waves of homesteading; individuals were granted land patents in the project area between 1866 and 1894. Three patents are located within S28, T3S, R67W, which contains the project area.

Reviews of the OAHP and SHPO databases indicated that 252 previously recorded sites are within 1 mile of the project boundary (Table 2-3, Figure 2-6). The majority (98 percent) of these sites are historic and consist of homes, buildings, and schools. Only two prehistoric open camps (5DV5 and 5DV16) and one paleontological site (5DV17) were recorded in this vicinity. Nine sites have been determined officially eligible and 42 sites have been determined officially not eligible by the SHPO. Thirty-seven sites have unknown eligibility for National Register of Historic Places (NRHP) listing. Five area sites are listed on the National Register. The current project area is located within the area of one site, 5DV711, the Stapleton International Airport. This site encompasses approximately 2,701 acres and was first recorded in 1975 during Historic American Engineering Record (HAER) documentation. 5DV711 has been recommended not eligible for nomination to the NRHP.

Prehistoric Context

The project area is in the northern Colorado River Basin as defined by the Prehistoric Context for the Platte River Basin (Gilmore et al. 1999). The Platte River Basin was used by a variety of Native American groups throughout all of prehistory, known to begin with Clovis if not earlier hunters at the end of the Pleistocene, and continuing through to the onset of European occupation of the region (Gilmore et al. 1999).

The Paleoindian stage, ranging from 12,400 to 5740 B.C., represented the earliest known human migrations to the New World, influenced by the environmental conditions of the Pleistocene era. The Paleoindian stage in the Platte River Basin includes three periods designated as the Clovis, Folsom, and Plano. In addition to these periods, Pre-Clovis occupation is evidenced in the Platte River Basin. Three sites have been recorded and

investigated that lend substantiation to this early activity, two sites located near the east edge of the Colorado border and one site located approximately 20 mile southwest of Denver (Gilmore et al. 1999).

Clovis sites (12,040–9750 B.C.) are rare, but six have been discovered in the Platte River Basin. Four of these Clovis sites are within an approximately 50-mile radius of the current project area. Twenty-three Folsom sites (11,340–8720 B.C.) have been identified in the Platte River Basin. One Folsom site is 15.5 miles from the Site and one is within 30 miles. The Plano period (10,850–5740 B.C.) is more substantial with 46 sites being recorded within the region, 5 of which are located within a 50-mile radius of the proposed Site (Gilmore et al. 1999).

In the Platte River Basin, the Archaic stage developed and lasted from approximately 5500 B.C. to A.D. 150. During this stage, the native populations developed subsistence and settlement patterns in response to the fluctuating environmental conditions that existed at the time. Twenty-six sites are attributed to the Early Archaic in this region; only two of these sites are within a 30-mile radius of the project area. The Middle Archaic (3000–1000 B.C.) saw a return to a cooler climate throughout the region and a subsistence pattern based on a broader range of plants and animals. Archaeologists have recorded at least 35 Middle Archaic sites in the Platte River Basin. Two Middle Archaic sites have been recorded within a 50-mile radius of the project area. Late Archaic (1000 B.C.–A.D. 150) populations are characterized by larger sites that were occupied for a longer extent and were more intensively used than sites of the Middle Archaic. At least 40 Late Archaic sites have been recorded in the Platte River Basin, none of which are within close proximity to the current project area (Gilmore et al. 1999).

In the Platte River Basin, the Late Prehistoric stage dates from A.D. 150 to 1540 and is divided into two periods: Early Ceramic (A.D. 150–1150) and Middle Ceramic (A.D. 1150–1540). Several Early Ceramic sites have been recorded within a 50-mile radius of the project area and approximately 67 sites have been recorded within the Platte River Basin. At least 31 Middle Ceramic sites have been identified in this region, three of which are 9 to 16.5 miles from the project area (Gilmore et al. 1999).

The Protohistoric period (A.D. 1540–1860) is defined to begin with the contact of native populations and Europeans, ends with the European domination of the region, and includes the introduction of horses (Gilmore et al. 1999). At least 26 Protohistoric sites have been recorded

in the Platte River Basin; no Protohistoric sites have been identified near the current project area.

Historic Context

The Spanish made forays into what is now Colorado since the late eighteenth century, attempting to establish trading relationships with the Native American groups who occupied the area. The Louisiana Purchase in 1803 brought about confusion over national borders between the American and Spanish governments, which resulted in Spanish patrolling of the northern plains and the present site of Denver until 1819. That year, the Adams-Obis Treaty was signed by both governments, resolving the dispute over where the boundary between American lands and Spanish lands was located, and American exploration of the region greatly increased (Mehls 1984). Exploration efforts were concentrated along the South Platte River. During the Oregon Migration of the 1840s, particular attention was paid in this region to the discovery of alternative routes for travelers moving west (Mehls 1984). Throughout the early nineteenth century, trading and trapping were the primary activities of the small non-Native population in the area.

When precious metal deposits were discovered in the 1850s, miners, their families, and those who hoped to cash in on the mining industry flooded into Colorado. Although mining was the backbone of the economy of the state until the late nineteenth century, industries including farming, ranching, coal mining, and other support industries, developed in conjunction with mining. The late nineteenth century was a time of change, and the economy of the state diversified. Farming, ranching, banking, tourism, and health industries grew in importance.

Founded as a mining camp, the city of Denver grew quickly. The population expanded from a few hundred settlers in 1859, to nearly 36,000 in only 20 years. By the turn of the century, the town had grown to nearly 135,000 people. Originally settled as a supply and transportation center for the remote mining districts, Denver grew and diversified to become an important commercial, banking, transportation, and to some extent industrial center by the early twentieth century.

The introduction of the railroad in Denver in 1870 meant that Denver was finally connected to a nationwide system of cities and transportation. Denver's links to other major cities in the region and country via railroad lines was an essential ingredient to the development of the city. During

the first half of the twentieth century, Denver became a large urban area specializing in regional energy development, distribution of goods and services, and a regional administrative center with both state and Federal government offices.

Historic Context of the Project Area

Although the surrounding regions supported mines, railroads, canals, and historic homesteads, the current project is situated on what was once ranching and farming lands. Individuals and families began dry farming in the area in 1859, raising cattle, vegetables, grain, and hay to sell to miners (Clark et al. 1997). Sheep and cattle ranching met with success in the late 1860s to 1880s when many ranchers grazed stock on unoccupied federal lands. However, maps (Noel et al. 1994 as cited in Clark et al. 1997) show that by 1900 no sheep or cattle were ranged adjacent to the Site. Although agricultural colonies were established throughout the region in the 1870s, none were founded in the vicinity of the Site (Clark et al. 1997). Even though the surrounding areas include development arising from the establishment of railroads and neighborhoods, the area around the Site remained devoid of activity until the construction of the Denver Municipal Airport in 1929.

Stapleton Airport was first inventoried for an intensive HAER documentation in July 1975 by J.R. Baker of the University of Colorado for the Colorado Historical Society (Baker 1975). The structures were described as being in excellent condition and numerous photographs were taken of the hangars and other out buildings. The airport was first bounded as an historic site in 1982 (Norgren 1982). In 1982, the site condition was described as totally disturbed and the entirety of the site was recommended not eligible for nomination to the NRHP. None of the early buildings from the 1920s and 1930s remained at the airport during the time of the 1982 recording. Two of the original hangars were still in existence, but had been moved off-site. Two 1950s hangars, Hangars 5 and 6 (Figure 2-3), were recorded, and were expected to be destroyed by the 1986 expansion of runways. Based on previous records, the current project area is located on the former site of these two hangars as well as portions of other nearby buildings. Although the original recording speculated that Hangars 5 and 6 would likely be destroyed by the 1986 runway expansion, the buildings are depicted on a 1993 aerial photograph (Figure 2-4) and the 1994 USGS topographic map. The buildings have since been demolished and no structures remain at the site.

Archaeological Resources

Only two prehistoric open camp sites (5DV5 and 5DV16) and one paleontological site (5DV17) have been recorded in the land immediately surrounding the project area. An examination of soil data concluded that potential for deeply buried soils does not occur within the project area. Due to previous disturbance and current redevelopment of the project area, it can be extrapolated that the potential of encountering sites prehistoric in nature, is minimal.

Historical Resources

Although the original Stapleton International Airport (5DV711) itself is a historic site, it has been recommended officially and determined not eligible for nomination to the NRHP. The only structures remaining from Stapleton International Airport are the control tower and the parking garage and neither of these buildings qualifies as a historic structure. Due to previous disturbance and current redevelopment of the project area, the potential of encountering historic sites or artifacts is extremely low, and there are no historic structures in the APE that would be impacted construction on the Site.

Criteria of Evaluation

The Proposed Action or an alternative may have the potential for a significant impact on cultural resources in the planning area if it would:

- a) Adversely affect properties eligible for or listed on the National Register, including
- b) archaeological, historical, architectural, and Native American or traditional heritage resources.
- c) Disturb or alter unknown archaeological resources eligible for the National Register.
- d) Directly or indirectly destroy a unique paleontological resource or unique geologic feature.
- e) Disturb any human remains, including those interred outside of a formal cemetery.

Impact to Cultural Resources

No Action

The No Action Alternative would have no impact on cultural resources. The No Action Alternative would result in FBI personnel continuing to be housed in the three current buildings, two in the central business district and one at the Federal Center. No know cultural resources are impacted by current FBI operations nor are any expected.

Proposed Action

Due to previous disturbance and current redevelopment of the project area, it can be extrapolated that the potential of encountering of Cultural Resources of any kind is minimal. Records indicate no potential for additional historic structures directly in the Site acreage. Because 5DV711 has been determined not eligible for NRHP nomination, GSA building development will not affect the historic setting of any significant historic properties in its surroundings. The height of the proposed facility is comparable to the surrounding infrastructure; thus there will be no impact to the visual setting of any significant historic properties.

2.5 SOCIOECONOMIC ENVIRONMENT

Two broad aspects of the socioeconomic environment -- land use, and population and economics are addressed in the following sections.

2.5.1 Land Use

The Site lies in a highly urbanized area in north-west Denver known as the Stapleton Redevelopment Area (SRA) (Figure 2-5). The SRA is the site of the former Stapleton International Airport. The 4,700 acre site is located mostly in the northeast part of City and County of Denver, and generally bounded by Quebec Street on the west, Havana Street on the east, Montview Boulevard on the south, Peoria Street of the southeast, and 64th Street on the north. Approximately 100 acres of the SRA are located in the City of Aurora.

When fully developed, the projected distribution of the 4,700 acres among general land use types is planned to be approximately: 33 percent residential, 29 percent commercial/industrial, 30 percent open space, 3 percent civic and 5 percent other. (Development Research Partners

2006) This translates to approximately 7.6 million square feet of retail, and 13.6 million square feet of office, research, and industrial space. In addition, the master-planned community will contain approximately 1,100 acres of parks, trails, and open space, including an 80-acre Central Park. Residential land use is planned to accommodate 12,000 housing units. Of these, 8,000 are projected to be homes and 4,000 projected to be rental units. Master-plan guidelines call for at least 10 percent of homes and 20 percent of rental units to be classified as affordable housing. (Development Research Partners 2006)

Planning for the redevelopment began in 1990 when neighboring residential and business organizations created the Stapleton Redevelopment Foundation. They developed the Stapleton Development Plan, or “The Green Book”, establishing guiding principles and a framework for redevelopment that embodies principles of new urbanism. An approach to land use and design regulation was recommended, including three components: 1) broad land use controls defining the general use, density, and character of development at a site-wide level, 2) more detailed design controls for individual districts, and 3) a mix of standards and programs applicable at the individual project scale. (CCOD 1995)

Mayor Wellington E. Webb and the Denver City Council created the Stapleton Development Corporation (SDC) in 1995 to oversee the disposition and development of the former airport site. SDC is charged with implementing the Stapleton Development Plan. The Denver City Council and Planning Board approved the Plan as part of the City of Denver’s Comprehensive Plan. (Stapleton Development Corporation 2007)

At year-end 2005, infrastructure improvements within the SRA were 40 percent complete. The improvements include roads, utilities for cable, telephone and electricity, storm water drainage systems, and sewer systems and earthwork. (Development Research Partners 2006)

The proposed development and the area surrounding the Site are being developed in accordance with the Stapleton Development Plan. An extract of the Overall Land Use Map v229 (Forest City 2007) showing the Site and adjoining properties is shown in Figure 2-6. Adjacent sites to the west and northwest are zoned Retail Commercial and form part of the Quebec Square retail area. Adjacent sites to the north and northeast are zoned Transit-Oriented Mixed-Use. These sites will form part of a future rail facility with associated food and service mixed use. These sites are currently undeveloped. Adjacent sites to the east, southeast and south are

zoned Office R&D. These sites are currently undeveloped. The adjacent site to the southwest is zoned Office R&D. The site will be served by infrastructure that is designed and newly constructed to serve planned development within the SRA. (Development Research Partners 2006)

The approximately 9.8 acre site represents only about 0.7 percent of the 1,363 acres designated for commercial/industrial use. The proposed 175,155 square foot office facility is only 1.75 percent of the 10 million square feet projected for office, research, and industrial space at build-out.

Criteria of Evaluation for Land Use

An alternative may have the potential for a significant impact on land use in the area if it would:

- a) Physically divide an established community.
- b) Result in land uses that are incompatible with adjacent uses.
- c) Conflict with any comprehensive land use plans that were approved by agencies having jurisdiction in the planning area.
- d) Conflict with any zoning ordinances or regulations enacted by agencies having jurisdiction in the planning area.

Impacts to Land Use

No Action

The No Action Alternative would have no impact on land use in the project area. The No Action Alternative would result in FBI personnel continuing to be housed in the three current buildings, two in the central business district and one at the Federal Center. These buildings and their uses are consistent with adjacent land use, and are in compliance with land use plans and zoning ordinances and regulations.

Proposed Action

The Proposed Action should have no impact on the current supply or price of housing within the SRA or surrounding communities. Although data characterizing the place of residence of current FBI staff were not identified, it is reasonable to assume that most current FBI staff will continue living at their current residences, particularly in the short-term. Even if some current

and/or new staff were to decide to live within the SRA, available housing should be more than adequate given that the SRA is projected to contain 12,000 dwelling units at build-out.

During public meetings attended by GSA, comments from members of the public expressed concern about the facility design, including compatibility with the SRA master plan, security measures (fencing), and parking. Because the project development team has not yet been chosen, a proposed facility design is not yet available, but the design will be consistent with design requirements of the SRA master plan.

2.5.2 Population and Economics

The discussion below summarizes the pertinent characteristics of the existing population and economic activity of the study area and potential impacts of the proposed development on these based on review of readily available information.

The proposed development will consolidate FBI Denver Division Office personnel now located at three different facilities in the Metro Denver Area in one office at the proposed site. Currently, the Denver Division Office employs approximately 300 personnel. The FBI is planning to hire additional staff and the new facility will be designed to accommodate approximately 375 personnel. (GSA 2006a) Data characterizing Denver Division Office personnel, e.g., place of residence, demography, income, spending patterns is not available.

At year-end 2005, SRA had an estimated population of 6,100 residents living in 2,300 dwelling units. This represented approximately one-fifth of the more than 30,000 residents in 12,000 dwelling units projected at build-out. (Development Research Partners 2006)

The majority of residents are estimated to be less than 45 years of age. Two-thirds are married. Eighty-seven percent hold at least a bachelor's degree, and 44 percent hold a post-graduate degree (Development Research Partners 2006). In addition, employment by businesses within SRA was estimated at 13,316, with an average annual wage of \$45,556. At build-out, employment within SRA is projected to be 39,770, with an average wage of \$49,894. (Development Research Partners 2006)

Although data was identified characterizing estimated spending of individuals employed at SRA, the data estimated the potential impact for the City of Denver and the Metro Area but not for retail establishments within the SRA.

The proposed project will not significantly increase population levels or densities within the SRA or the Metro Denver Area either in the short-term construction phase, or during the longer-term operation of the facility.

The proposed project will create some construction jobs, but the number is insignificant. The proposed 175,155 square feet facility represents only about 2.7 percent of the 6.4 million square feet of non-residential space completed at SRA by end-of-year 2005, which is estimated to have employed 10,287 full-time employees for construction. The demand for construction workers should be supplied totally by the Metro Denver market, as it has been for other construction projects within the SRA. (Development Research Partners 2006)

The current Denver FBI staff size of 300 is only about 2.2 percent of the SRA 2005 employment of 13,316, and the projected FBI staff of 375 is just under 1 percent of the 39,770 projected for the SRA at build-out. Even these numbers overstate the potential impact on population given that current FBI staff members are being relocated to the SRA from other Metro Denver locations, reside in the region now, and plausibly, most are likely to maintain their current place of residence, particularly in the short term.

The Proposed Action will consolidate personnel from three Metro Denver offices to the SRA, but it will not create or displace jobs. And, as stated above, 75 additional staff is a miniscule proportion of current and projected future SRA employment.

Although some citizens expressed their hope that having the FBI facility located at SRA would decrease criminal activity within SRA and the neighborhoods surrounding it, data suggesting that such facilities impact crime in surrounding neighborhoods could not be identified.

Criteria of Evaluation for Population and Socioeconomics

An alternative may have the potential for a significant impact on population and housing if it would:

- a) Displace housing stock and large numbers of people residing in the planning area and necessitate the construction of replacement housing elsewhere.
- b) Directly or indirectly cause substantial population and housing growth in the planning area that would conflict with local goals and supporting capabilities.
- c) Displace businesses in the planning area with resulting job losses and reductions in economic activity.
- d) Directly or indirectly cause large economic or employment growth in the planning area.

Impacts to Population and Socioeconomics

No Action

The No Action alternative will have no impact on population and socioeconomics. The No Action Alternative would result in FBI personnel continuing to be housed in the three current buildings, two in the central business district and one at the Federal Center. The No Action alternative does not displace any businesses or affect economic or employment growth in the areas near the existing offices.

Proposed Action

Given the relatively small size of the Proposed Action and that it will consolidate the three existing FBI offices into one facility; the Proposed Action should have no significant impact on population or the economic environment. The implementation of the Proposed Action at the site would not displace any businesses or affect economic or employment growth. Although not significant, its impact is judged as positive. The new FBI facility, if constructed, will vacate the existing FBI office space in the Byron G. Rogers Federal Building, which will likely be filled by other Federal agencies requiring additional space, and would result in no significant impact to businesses near the current FBI offices.

The Proposed Action may also have a beneficial impact because the site currently contributes nothing to the tax base of the community. The proposed improvements to the site may generate additional tax revenue for the City and County of Denver.

2.6 TRAFFIC CIRCULATION/SAFETY

The parameters governing SRA development will largely determine the character of the traffic circulation and safety environment of the proposed site. At the most general level, the assessment of potential impacts considers if the proposed action will cause significant change in characteristics of the traffic circulation and safety environment as compared to the baseline of taking no action. The assessment is qualitative, addressing the potential magnitude and direction (i.e., positive or negative) of potential change.

Figure 2-7 depicts many of the existing and planned transportation system features of the site proposed for development of the new FBI facility and its setting, the Stapleton Redevelopment Area (SRA). The SRA master-plan is based on a sustainable development philosophy that emphasizes land use that is mixed, and community design which is compact and has transit-oriented characteristics that can reduce dependence on automobiles and increase the efficiency of service delivery, and encourages area workers and residents to use bus and rapid transit, bicycles, and walking for commuting and errands to the extent possible. (CCOD 1995)

Access to and from SRA is provided now by interstate highway, the surrounding urban street grid, bus, and bike paths. SRA is located north and south of Interstate 70, with access at Quebec Street, Havana, and Peoria Streets. Interstate 270 also provides access at Quebec Street. Travel time between SRA and downtown Denver is 10 minutes, and between SRA and Denver International Airport is 20 minutes (Development Research Partners 2006). The SRA is designed to incorporate the street grid of the surrounding metropolitan area into and through the redevelopment area. Public bus transportation serves SRA currently. A Park-n-Ride facility serving 9 bus routes is located at Martin Luther King, Jr. Boulevard and Syracuse Street, four blocks from the proposed facility. Two other existing stops are two blocks from the site. On-street bike paths access the Quebec Square Regional Retail Center from 35th Avenue and Syracuse Street.

Access between the SRA and the wider metropolitan area and Denver International Airport is an explicit consideration of regional transportation plans. Several transportation improvements are

planned or in various stages of construction for the SRA. An intermodal transportation center is planned for construction at East Smith Road and Ulster Street, two blocks from the proposed FBI facility. The facility will serve 10 proposed new bus routes, including a circulator route within SRA, and an Air Train connecting downtown Denver and Denver International Airport. Light rail access will be provided to SRA when the East Corridor line is completed by the Regional Transportation District's FasTracks Project in 2014. The line will run from Union Station in downtown Denver to Denver International Airport. The Stapleton Station will provide 1,500 parking spaces for Park-n-Ride customers. (Development Research Partners 2006)

Access streets to the proposed FBI site are planned for construction. Ulster Street, and 35th and 36th Avenues will be extended from the urban area surrounding SRA to run next to the site on the east, north, and south. In addition to the improvements noted above, a new bus stop is planned on 35th Avenue at the southwest corner of the proposed FBI site. Finally, the on-street bike path will be extended with 35th Avenue along the site's southern border.

The South Stapleton Traffic Signal Plan identifies two corners of the proposed FBI site as potential future signal site, at 36th Avenue and at 35th Avenue, where each intersects Ulster Street (URS 2007).

Implementation of the alternative to acquire land and construct a new FBI facility at the proposed site, particularly considering its setting within the SRA, is judged to have no significant impact on traffic circulation and safety. The proposed building is consistent with the SRA master-plan. The master-plan placed particular emphasis on transportation issues.

The location of the planned facility is well-positioned for staff and visitors to take advantage of the many adjacent or nearby public and alternative transportation features that are present now and planned for the future. Local officials and citizens expressed concern that the facility be designed to provide a sufficient number of bicycle racks or other storage, and consider including showering and locker room facilities to encourage staff to commute by bicycle.

Criteria of Evaluation for traffic circulation and safety

The Proposed Action would have significant impact on operating conditions and surrounding streets if it would cause any of the following consequences:

- a) Substantially increase traffic as compared to the existing traffic load and capacity of the street system.
- b) Substantially alter present patterns or circulation movements.
- c) Conflict with the goals or policies of regional or local transportation plans.

Impacts for traffic circulation and safety

No Action

The No Action Alternative would have no impact on traffic circulation and safety because existing traffic volumes and patterns are not altered. The No Action Alternative would result in FBI personnel continuing to be housed in the three current buildings, two in the central business district and one at the Federal Center, and not expected to change traffic circulation or safety.

Proposed Action

The potential contribution of the proposed FBI facility to area traffic is judged to be insignificant because the number of FBI employees is small compared to total SRA employment. The FBI employees will constitute only about 2.2 percent of SRA 2005 employment and less than 1 percent of SRA employment projected for SRA build-out. Construction activity associated with development of the proposed FBI site also will be small compared to total construction activity within the SRA.

Although the potential impact of the proposed FBI facility on traffic circulation and safety is not significant, it is judged as positive in that the proposed action is consistent with and contributes to the achievement of the Stapleton Redevelopment Plan. The location of the Proposed Action is well-positioned for staff and visitors to take advantage of the many adjacent or nearby public and alternative transportation options. Local officials and citizens expressed concern that the facility be designed to provide a sufficient number of bicycle racks or other storage, and consider including showering and locker room facilities to encourage staff to commute by bicycle.

2.7 HAZARDOUS MATERIALS

A Phase I Environmental Site Assessment (ESA) was completed in July 2007 (Waterstone 2007). The Phase I ESA consisted of an environmental records review, site reconnaissance and an interview with representatives of Forest City Enterprises, the master developers of the former SIA. Known environmental issues at the Site include:

- Asbestos in surface and subsurface soils throughout the site.
- Petroleum products, volatile organic compounds (VOCs), and semi volatile organic compounds (SVOCs) may be present in groundwater from eight underground storage tanks (USTs) associated with former Hangars 5 and 6.
- VOCs (specifically trichloroethene (TCE) and tetrachloroethene (PCE)) were detected in groundwater samples collected in the oil/water separators associated with Hangars 5 and 6, as well as in other samples collected within the former footprint of the hangars, and in the storm sewer west of the hangars.
- Total extractable petroleum hydrocarbons (TEPH) staining has been observed in one of nine soil borings in locations associated with former buildings 16, 17, 19 and 20.
- Sanitary sewers and storm drains were formerly located along Ulster Street, and passed through the Site. These drains and sewers may have acted as preferential flow pathways for spilled fuels or glycol. Sampling has not been conducted to date due to the discovery of asbestos.
- Elevated concentrations of nitrates exist beneath the Site at concentrations above cleanup standards. Nitrates are not known to present a human health risk as long as the groundwater is not consumed. Groundwater will not be used as a water supply source to the Site.
- Petroleum products and VOCs may be present in subsurface soil in the vicinity of the former concourse E, immediately south and hydraulically up gradient to the Site,
- There is a historic landfill 800-feet south-west of the Site. The landfill operated between 1929 and 1947. The types and nature of wastes that accumulated in the landfill are unknown.
- Potential groundwater contamination from the CCOD Fire Station #1, ¼ - ½ mile south / south-east of the Site
- Potential groundwater contamination from the SIA Rental Car Zone, ¼ - ½ mile south / south-east of the Site
- Potential groundwater contamination from the SIA Runways south and east of the Terminal, ¼ - ½ mile south-east of the Site
- Potential groundwater contamination from the Hertz leaking underground storage tank at 7600 Martin Luther King Jr. Blvd, ¼ - ½ mile south / south-west of the Site

- Potential groundwater contamination from the retail gas station leaking underground storage tank at 3595 Quebec Street, ¼ - ½ mile west of the Site.
- Historic leaking gasoline underground storage tanks, jet fuel pipelines and glycol underground storage tanks have been remediated at Concourse A and A', approximately 1500-feet south of the Site
- Numerous spills of hydrocarbons, glycols and solvents have been reported in the concourse B area, approximately 1500-feet south-east of the Site. The area has been subject to remediation.
- A jet fuel plume was identified emanating from Concourse C, approximately 700-feet east / south-east of the Site. Contaminated soils extended north-east to the Concourse D and benzene, toluene, ethylbenzene, and xylenes (BTEX) contaminated groundwater extended north-east to north of Smith Road. The area has been subject to remediation.
- Leaking underground storage tanks, fuel pipelines and hydrants have been identified as sources of contamination at Concourse D, east of the Site. The area has been subject to remediation.
- Numerous areas near the Site formerly contained glycol USTs that were used as deicing pads, and had documented historical SNC/MFDA exceedences of glycol. Glycol readily degrades, and while no known exceedences of glycol are present on the Site, methane which is generated during glycol degradation, was measured in numerous borings installed near the Site.

Given the historical industrial activity on the Site and surrounding area and the presence of the above mentioned potential recognized environmental conditions on Site and upgradient of the Site, the GSA is completing a Phase II ESA in order to quantify a pre-transaction environmental baseline, and protect against construction worker and future office user health liabilities.

Criteria of Evaluation for Hazardous Waste

An alternative may have the potential for a significant impact if it would:

- a) Create a hazard to public health or the environment through the use, handling, transport, or disposal of hazardous materials or wastes.
- b) Create reasonably foreseeable conditions that would have the potential for improper release of hazardous materials into the environment.
- c) Locate facilities on a site included on a list of hazardous material or waste sites compiled in accordance with Federal and State laws.
- d) Subject humans to soils with concentrations of hazardous materials in excess of health advisory limits.

Impacts to Hazardous Materials

No Action

The No Action Alternative would have no impact on site contamination or hazardous waste. The No Action Alternative would result in FBI personnel continuing to be housed in the three current buildings, two in the central business district and one at the Federal Center. There are no known hazardous materials issues associated with the current FBI operations in the existing buildings.

Proposed Action

Given the historical industrial use of the area and surrounding area, the presence of the Recognized Environmental Conditions on and upgradient of the Site, and the asbestos remediation activities, a Phase II ESA has been conducted in order to establish a pre-transaction environmental baseline, and protect against construction worker and future office user health liabilities. The results of the Phase II ESA will be provided when they are available.

Because of the Site history of extensive use for aviation purposes and the gaps in the site history regarding hazardous material use and disposal, the Proposed Action could result in conditions that would expose construction workers and future FBI office workers to concentrations of hazardous materials in excess of health advisory limits. The most likely impact is that concentrations of volatile organic compounds, including fuel constituents and solvents, in soil or groundwater beneath the site could cause indoor air concentrations above a level of concern for human health affects. Mitigation measures to address potential exposure to volatile organic compounds are available. Construction workers should be made aware of the conditions and appropriate worker protections should be required during building construction. Engineering controls included in the building design, such as foundation vapor barriers and active ventilation of basement areas, would protect office workers in the building from potential exposure to contamination.

2.8 UNAVOIDABLE ADVERSE AFFECTS

Unavoidable adverse impacts occur when a proposed project results in significant adverse impacts for which there are no reasonably practicable mitigation measures, and for which there are no reasonable alternatives to the proposed project that would meet the purpose and need of the action, eliminate the adverse impact, and not cause other or similar adverse impacts.

Disturbance and/or loss of unidentified cultural sites or artifacts could result in an unavoidable adverse affect from loss of information about the heritage in the proposed area and throughout the region, if those resources are not identified, and/or appropriately protected prior to disturbance. The discovery of cultural sites or artifacts is very unlikely at this Site; however, if any cultural resources are identified during construction, the project will be stopped while GSA notifies the appropriate state historic agency.

2.9 IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES

The NEPA requires that environmental analysis include identification of “any irreversible and irretrievable commitments of resources which would be involved in the proposed action should it be implemented.” Irreversible and irretrievable resource commitments are related to the use of nonrenewable resources and the effects that the uses of these resources have on future generations. Irreversible effects primarily result from the use or destruction of a specific resource (such as energy or minerals) that cannot be replaced within a reasonable time frame. Irretrievable resource commitments involve the loss in value of an affected resource as a result of the action (such as extinction of a threatened or endangered species or the disturbance of a cultural site) that cannot be restored. The proposed project would not result in the irretrievable commitment of any resources.

2.10 CUMULATIVE IMPACTS

Cumulative effects are direct and indirect effects of project actions that are greater in significance than just the sum of the direct and indirect effects, when viewed in the context of the total effects of other past, present, and reasonably foreseeable future actions. No substantial cumulative effects are anticipated for the alternatives analyzed in this environmental assessment.

The construction of a FBI Division Office is consistent with the existing development pattern and characteristics of this site and is not expected to change the quality of the established human environment or initiate cumulative adverse impacts. Future development will likely occur to the north, east, and south of the Site in the form of new commercial development, in the immediate vicinity, and residential development further away, but the proposed action would not induce or retard growth in the area.

Disturbance and/or loss of unidentified cultural/historic sites or artifacts could add to the cumulative loss of information about the heritage in the proposed area and throughout the region, if those resources are not identified, and/or appropriately protected prior to disturbance. However, such losses are not expected because the area is not known to have cultural sites or artifacts.

2.11 MITIGATION MEASURES

Air Quality

Air quality could be adversely affected during construction. This impact would be short-term, but mitigation measures, such as wetting soil during excavation to prevent particulate emissions are required by state regulation and should be emplaced to reduce this potential impact. In the long-term, if FBI employees and visitors to the new building use the available alternative transportation the overall air quality in the region could be improved due to reduction in emissions from private vehicles. In addition, if energy conservation and alternative energy generation, such as solar panels, are included as design features, additional positive long-term impact to air quality could be realized.

Hazardous Materials

Known environmental issues at the Site have been discussed in Section 2.7 and include actual asbestos contamination and potential soil and groundwater contamination by hydrocarbons, glycols and solvents.

GSA is conducting a Phase II ESA in order to quantify a pre-transaction environmental baseline, and protect against construction worker and future office user health liabilities. The Phase II ESA will include making 6 soil borings to bedrock that will analyze soil, groundwater and soil gas, as per the Phase II ESA Work Plan (Appendix F). If contamination is detected above the SNC/MFDA standards (concentrations that pose a risk to human health) during the Phase II ESA, then appropriate remediation of the contamination will be required of the property owner prior to sale of the property.

The Site has been identified as having asbestos contaminated soils and most of the Site is affected (Forest City 2005, CCOD 2006). Forest City Enterprises, the master developers of the former SIA, have previously provided a CDPHE approved Soil Characterization and

Management Plan (site work plan) for asbestos contaminated soil (ACS) remediation activities (Waterstone 2007) and presumably the asbestos will be mitigated prior to the property being sold for development of the Proposed Action.

The asbestos remediation work plan calls for excavation and removal of asbestos containing soils with clearance sampling following removal to assure all asbestos has been removed. The clearance criterion is no detections of asbestos in the systematically collected soil samples. The final inspection report should be provided to the GSA for review. All fill material needed to back fill excavations associated with the removal of ACS will be derived from clean soil stockpiles that were sampled as part of the Phase II ESA.

Despite the remediation activity, asbestos on the site remains a potential recognized environmental condition. The fact that asbestos remediation has occurred on the Site should be made known to all involved in construction of the future FBI Denver Division Office building. The potential for encountering asbestos and other potential contamination should be included in the construction Health and Safety Plan. If asbestos is encountered during construction, CDPHE must be notified and further remediation under CDPHE regulations will be required.

If volatile organic compounds are detected, then mitigation measures should be included to protect construction workers and in the building design to protect future office workers. The mitigation measures for construction could include breathing zone monitoring of volatile organic compounds, including fuel components, and providing appropriate personal protection equipment if contamination is detected above levels of concern as defined by OSHA. The mitigation measures for building design should include engineering controls that would prevent potential exposure to contamination including vapor barriers around foundations and active ventilation of basements.

Land Use

Concerns about the facility design, including concerns about the security measures and compatibility with surrounding uses, were raised during the public meetings. The design is not yet available but will meet SRA design requirements.

Traffic Circulation/Safety

An identified community concern was that the employees of the proposed FBI facility be encouraged to utilize alternative modes of transportation to and from work. A mitigation measure to encourage public transportation may be to provide yearly bus/rail passes to FBI employees. In addition, the design of the proposed facility should provide for sufficient number of bicycle racks or other storage, and include showering and locker room facilities to encourage commuting by bicycle.

3.0 PUBLIC PARTICIPATION AND COORDINATION

Scoping occurs early in the process of developing an EA. Scoping is an open process that strives to involve any Federal, state, or local government agency and members of the public that may have interests in the proposed action and its consequences for the wider environment.

The following public involvement activities took place during the EA scoping process:

- Developed and distributed a Fact Sheet and Comment Form;
- Published an ad and legal notice in the regional newspaper; and
- Attended and presented at three community meetings.

The Fact Sheet (Appendix D) provides a brief description of the proposed action, why the FBI needs the new facility, the NEPA and EA processes, and schedule for completing the EA process and developing the new facility. In addition, it asks for comments and questions from the public and informs them of how to provide these.

The newspaper display advertisement and legal notice announcing the proposed project and providing information on how to obtain information and provide comment appeared in the *Denver Post* on July 15, 2007.

In addition, a letter to Federal, state, and local public officials informing them of the project was mailed September 2007. The list of public officials receiving a letter and a copy of the letter is included in Appendix D.

Representatives of GSA attended three community meetings to make a presentation about the proposed action, to answer any questions, and to solicit and hear perceptions and concerns

about the proposed project. Informational displays in the form of poster boards, as well as the Fact Sheet and Comment Form, were made available to participants at each of these meetings.

The first meeting was with the Community Roundtable on June 26, 2007. The Community Roundtable is a quarterly forum for neighborhood organizations within and adjacent to the SRA. Participants include two representatives from each of the five neighborhood organizations, and other stakeholders in the SRA. Organizations participating in the Community Roundtable include the Northeast Park Hill Coalition; Greater Park Hill, Inc.; East Montclair Neighborhood Association; Northwest Aurora Neighborhood Organization; Stapleton United Neighbors; Forest City, Stapleton; and Stapleton Foundation.

The second meeting was with the Stapleton Citizens' Advisory Board (CAB) Zoning and Planning Committee (ZAP), on July 10, 2007. The ZAP is a committee of the CAB and has three functions as its mission. First, it provides input from ZAP and the neighborhoods in and surrounding Stapleton to Forest City, the SRA Master Developer. Second, ZAP advises CAB on development plans, zoning changes, and redevelopment issues, with a particular focus on site plans, transportation and traffic, zoning, and redevelopment that affects existing and future development within Stapleton and adjoining neighborhoods. Third, ZAP periodically reviews design criteria that the Stapleton Design Review Board enforces. Approximately twelve ZAP members participated in the July 10 meeting.

The third meeting was a joint meeting of the Denver Police Department, District 2 Citizens' Advisory Board (2CAB) and the Northeast Park Hill Neighborhood Association on July 19, 2007. The 2CAB is an advisory group of residents living in neighborhoods within the Denver Police District 2. Members convene to discuss opportunities and challenges as they relate to policing within District 2, as well as new development within the area. Advanced notification of GSA's attendance at the meeting to discuss the proposed project was given to members via e-mail. The fact sheet prepared for the project was attached to the e-mail. As many as 75 people participated in this meeting.

All comments submitted from members of the public on the Proposed Action either in writing or verbally at a public meeting have been incorporated as appropriate. Written comments received from members of the public are included in Appendix D. Many of the comments received at the public meetings were in regards to the building design, including questions regarding the height,

sustainable design, and security features of the facility. As discussed in Section 1.2.1, because the project development team has not yet been chosen, a proposed facility design is not yet available to share with the public. The design will be consistent with design requirements of the SRA master plan and incorporate all necessary security features. GSA and FBI may provide preliminary design presentations to the public at a later date.

The second-most frequently asked questions at the meetings had to do with transportation and parking. As discussed in Section 2.6, the location of the planned facility is well-positioned for staff and visitors to take advantage of the many adjacent or nearby public and alternative transportation features that are present now and planned for the future. The number of parking spaces was determined by the projected needs of the FBI. Facilities to encourage staff to commute by bicycle, such as bike lockers and showers, will be considered during the design phase.

Other questions had to do with employment and potential economic impacts from the facility. Socioeconomic impacts are discussed in Section 2.5. It is anticipated that the facility will provide employment to 318 FBI personnel. The Proposed Action will consolidate personnel from three Metro Denver offices to the SRA, but it will not create or displace jobs. The anticipated FBI staff is a minuscule proportion of current and projected future SRA employment. In addition, food service will not be available to FBI staff within the facility, so it can be anticipated that staff would purchase food from nearby restaurants. It is also likely that FBI staff would utilize nearby shopping opportunities, thus contributing positively to the local economy.

Although some citizens expressed their hope that having the FBI facility located at SRA would decrease criminal activity within SRA and the neighborhoods surrounding it, data suggesting that such facilities impact crime in surrounding neighborhoods could not be identified.

4.0 CONCLUSIONS

Section 2 describes the physical, social and cultural environment of the planning area, as well as the potential for impacts from the No Action Alternative and the alternative of constructing the Proposed Action. The following table provides a comparative summary of the potential impacts of these alternatives based on the conclusions in Chapter 2. Impacts have been classified into the following categories:

- No Impact
- ◆◆ Very Beneficial Impact
- ◆ Beneficial Impact
- Minor Negative Impact
- Moderate Negative Impact
- High Negative Impact

Impact	Proposed Action	No Action
Air Quality	●	○
Soil and Geology	○	○
Topography	○	○
Natural Hazards	○	○
Water Resources	○	○
Man-made Environment and Infrastructure	○	○
Biological Resources	○	○
Cultural Resources	○	○
Land Use	○	○
Population and Socioeconomics	◆	○
Traffic Circulation/Safety	◆◆	○
Hazardous Materials	●● ¹	○
Unavoidable Adverse Affects	○	○
Irreversible and Irretrievable Commitment of Resources	○	○
Cumulative Impacts	○	○

¹ This determination is worst-case and is subject to change depending upon outcome of the Phase II Environmental Site Assessment.

While the No Action Alternative results in no impact, this alternative would not meet the operational and security needs of the FBI. The proposed action is expected to have only minor negative impacts to air quality during construction and could have negative impacts from hazardous materials. Both of these adverse impacts can be mitigated without great difficulty. Adverse air quality impacts can be mitigated through management practices during construction. Potential exposure to hazardous materials can be mitigated through a building design that incorporates engineering controls, such as vapor barriers in the foundation and active ventilation of any basement areas.

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