




U.S. Department
of Transportation
**Federal Highway
Administration**


Memorandum

Subject: **INFORMATION:** CO 80 (Guanella Pass Road) Reevaluation Findings

Date: May 20, 2009

From: Mark Meng 
Project Manager

In Reply Refer To:
HFPM-16

Through: Richard Cushing 
Environmental Planning Engineer

To: Project File

Based on the studies performed for this reevaluation of the 2002 Guanella Pass Road Final Environmental Impact Statement (FEIS) as it relates to the proposed surface material change, no new significant environmental impacts have been identified. The proposed change evaluated includes surfacing the gravel and macadam sections of the route and related parking lots (as selected in the project's 2003 Record of Decision) with asphalt, with a chip seal overlay to minimize visual impacts. All other aspects of the 2002 FEIS remain unaffected by this reevaluation.

In accordance with 23 CFR 771.130, the FHWA Central Federal Lands Highway Division has determined that this action will have no new significant impacts and therefore a supplemental EIS for the Guanella Pass Road project (CO PFH 80) will not be necessary. A Revised Record of Decision will be prepared documenting this change and any associated changes to mitigation measures, and will be circulated in accordance with 23 CFR 771.127 (b).





GUANELLA PASS ROAD

CO PFH 80

REEVALUATION

April 2009



U.S. Department of Transportation
Federal Highway
Administration

Central Federal Lands Highway Division

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I. INTRODUCTION

The Federal Highway Administration (FHWA), Central Federal Lands Highway Division, prepared this reevaluation of the Colorado Forest Highway 80 (Guanella Pass Road) project for the preferred alternative (Alternative 6) selected in the 2003 Record of Decision (ROD). The selected alternative is currently being implemented in phases. Construction of Phase I was completed in 2007, construction of Phase II is currently underway, and construction of Phase III is planned for 2012. The gravel and macadam sections constructed in Phase I have been deteriorating at an accelerated rate and are not performing as anticipated. In response, a Route Assessment evaluating the performance of the improvements was conducted. The findings of the Route Assessment revealed severe erosion and surface degradation on the gravel and macadam sections and recommended that these portions of the roadway be surfaced with a permanent and sustainable surface. Therefore, this evaluation focused on the proposed change of surfacing the gravel and macadam sections of the route with asphalt (with chip seal overlay) to determine if this change would result in new significant environmental impacts not previously considered in the Final Environmental Impact Statement (FEIS).

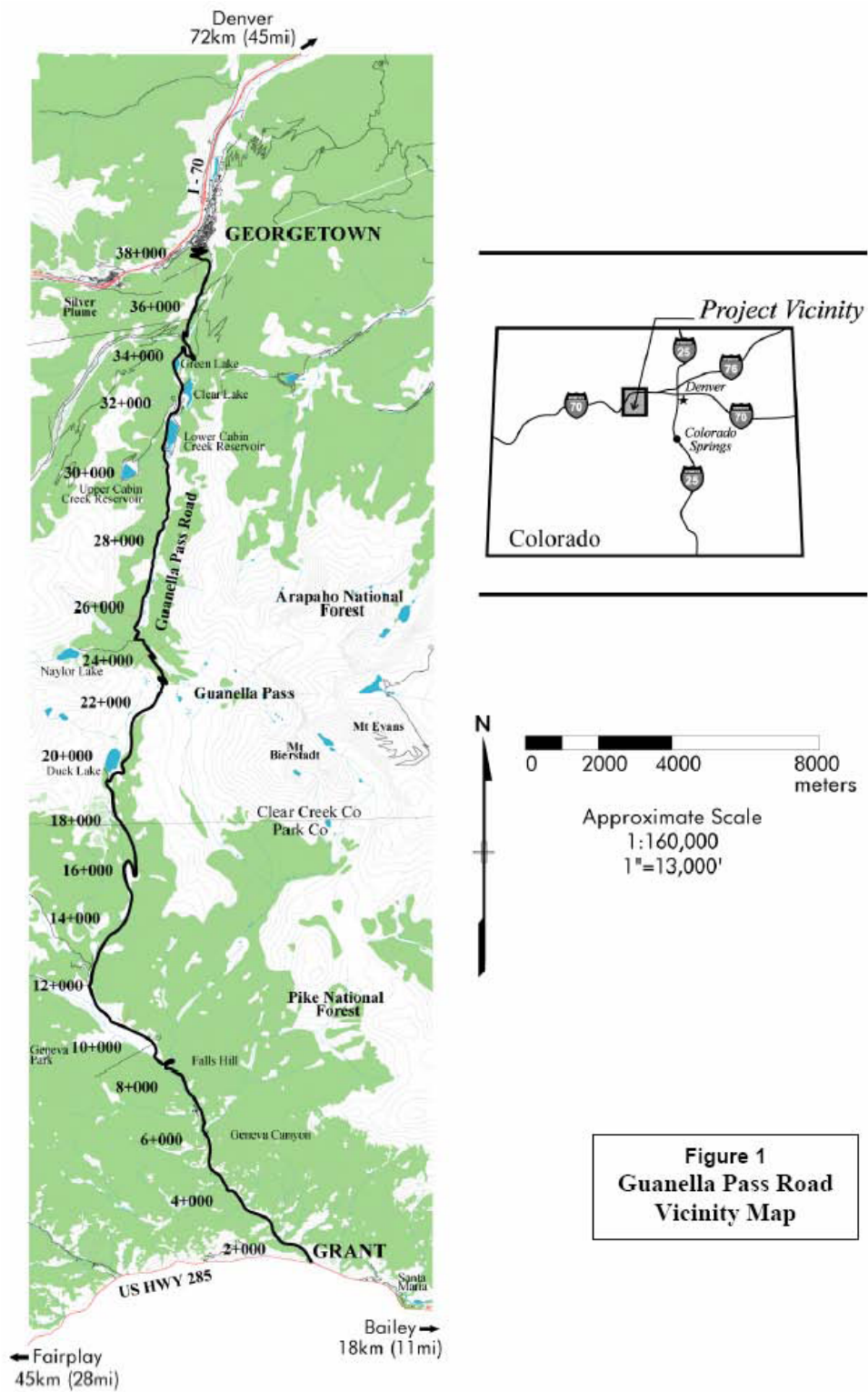
II. PROJECT BACKGROUND AND HISTORY

Colorado Forest Highway 80, or Guanella Pass Road, (also known as Park County Road 62, Clear Creek County Road 381, and Forest Development Road 118) is approximately 45 miles west of the Denver metropolitan area. It begins at US Highway 285 in Grant, Colorado, and proceeds in a northerly direction over Guanella Pass, ending at the south edge of Georgetown, Colorado. Figure 1 is a map showing the location of Guanella Pass Road with respect to Denver, Colorado. The roadway is 23.7 miles in length—the southern 10.7 miles in Park County and the northern 13.0 miles in Clear Creek County. Approximately 0.7 mile of the Clear Creek County portion is within the Georgetown town limits. The road passes through the Pike-San Isabel and Arapaho-Roosevelt National Forests and is used primarily for recreational purposes (90 percent of traffic). The Guanella Pass Road Improvement Project (the project) was developed by the FHWA Central Federal Lands Highway Division, in cooperation with the Forest Service (FS), Park County, Clear Creek County, the Town of Georgetown, and the Colorado Department of Transportation (CDOT).

The project was developed and selected through the National Environmental Policy Act (NEPA) decision-making process. Major milestones of the project include:

- June 1998—release of the Draft Environmental Impact Statement (DEIS).
- November 2000—release of the Supplemental Draft Environmental Impact Statement (SDEIS).
- September 2002—release of the Final Environmental Impact Statement (FEIS).
- January 2003—release of the Record of Decision (ROD).
- Phase I—construction from milepost 9.3 to milepost 17.0 was completed in 2007.
- Phase II—construction from milepost 17.0 to the town of Georgetown is currently underway.
- Phase III—construction (on the Park County side) is planned for 2012.

Figure 1. Guanella Pass Road



Work completed in Phase I involved rehabilitation, light reconstruction, and full reconstruction, which incorporated the three different surfacing materials selected for the project (asphalt, macadam, and gravel with dust palliative). Visually sensitive design elements selected through several stakeholder design workshops were also integrated into the project. These included rockery cut walls, retaining walls with rock or rock-like facing, and steel-backed timber guardrails. The vast majority of the work constructed has been an enormous success. However, shortly after construction was completed, Park County and Clear Creek County expressed concern to the FHWA on observed problems along the gravel and macadam sections of the route. In response, the FHWA hired an independent consultant to prepare a Route Assessment to evaluate the effectiveness of the work constructed to date, evaluate the performance of roadway elements in the constructed portion of the route, evaluate the sustainability of project elements for the route, and provide recommendations for any necessary modifications to the constructed and proposed route improvements.

The Route Assessment (Jacobs 2009) revealed that the majority of the work is meeting the objectives of the project, as developed through the NEPA process. The exceptions are the locations where gravel and macadam are the surfacing materials. In these areas, severe surface degradation is occurring, including rutting, washboarding, and premature failures. This premature roadway degradation is leading to increased erosion, adverse impacts to water resources, decreased safety, and greatly increased maintenance needs and costs. It is also putting the financial investment made on the project at risk. Taking these factors into consideration, the Route Assessment concluded that in these areas some of the primary objectives of the project are not being realized and recommended that the objectives of the project could be fully realized if a permanent and sustainable surface is used. The recommended surface material for the gravel and macadam sections is asphalt, with a chip seal overlay providing a similar visual appearance to the macadam.

Upon further review of the Route Assessment and following internal discussions at FHWA, it was decided to pursue a change in surface type both in the previously constructed sections of the project reviewed in the Route Assessment, as well as in the Phase III sections of the project where gravel or macadam was the planned surface type. Although these sections are lower in elevation, there are still several steep areas through these sections. Additionally, Geneva Creek flows very close to the road in this area. Geneva Creek is a high priority impaired water in Colorado. If erosion were to occur on road surfaces that close to the creek, there is a serious potential of water quality degradation as a result. Water quality impacts were one of the concerns on the project as a whole, and reduction of water quality impacts was one of the objectives of the original project.

III. PURPOSE OF THIS REEVALUATION

The Council on Environmental Quality and FHWA's regulations require that a supplemental Environmental Impact Statement (EIS) be prepared whenever changes to a proposed action, or new circumstances or information may result in significant impacts that were not evaluated in the FEIS. To determine if such changes are significant, the regulations require the development of appropriate environmental studies.

Specific regulations regarding requirements for conducting supplemental EISs are contained in Title 23 of the Code of Federal Regulations (CFR) Part 771, *Environmental Impact and Related Procedures*. Specifically, 23 CFR 771.130 states:

- (a) A draft EIS, final EIS, or supplemental EIS may be supplemented at any time. An EIS shall be supplemented whenever the Administration determines that:
 - (1) Changes to the proposed action would result in significant environmental impacts that were not evaluated in the EIS; or
 - (2) New information or circumstances relevant to environmental concerns and bearings on the proposed action or its impacts would result in significant environmental impacts not evaluated in the EIS.
- (b) However, a supplemental EIS will not be necessary where:
 - (1) The changes to the proposed action, new information, or new circumstances result in a lessening of adverse environmental impacts evaluated in the EIS without causing other environmental impacts that are significant and were not evaluated in the EIS; or
 - (2) The Administration decides to approve an alternative fully evaluated in an approved final EIS but not identified as the preferred alternative. In such a case, a revised ROD shall be prepared and circulated in accordance with §771.127(b).
- (c) Where the Administration is uncertain of the significance of the new impacts, the applicant will develop appropriate environmental studies or, if the Administration deems appropriate, an EA [Environmental Assessment] to assess the impacts of the changes, new information, or new circumstances. If, based upon the studies, the Administration determines that a supplemental EIS is not necessary, the Administration shall so indicate in the project file.

Therefore, the primary purpose of this evaluation is to determine whether or not the proposed surface material change, new information, or new circumstances result in significant impacts not previously evaluated in the FEIS. The findings of this evaluation will provide the information needed for FHWA to determine whether or not a supplemental EIS is needed as provided for in 23 CFR 771.130(a).

IV. CONFIRMATION OF PROJECT PURPOSE AND NEED

A review of the project purpose, need, and objectives was conducted to ensure they remain valid. The 2002 FEIS described the purpose of the Guanella Pass Road project as being based on the need to balance transportation requirements (including recreational access to Forest Service [FS] lands) and roadway maintenance requirements with the sensitive nature of the environment. The needs for the project were based on three categories: (1) *transportation* needs, including increased traffic volumes, inadequate surface condition, safety concerns, and local access; (2) *environmental* needs, including the sensitive environmental setting and soil erosion and sedimentation; and (3) *maintenance* needs, including roadway maintenance cost, drainage, and untreated roadway surface conditions.

Eight project objectives were developed during the NEPA process for the project. The 2003 ROD states that “Alternative 6 has been selected because it best balances the transportation and maintenance needs with the sensitive nature of the environment.” Alternative 6 provided the best overall balance of the sometimes conflicting needs of the project by ensuring that each objective was at least partially addressed to a minimum level of satisfaction.

The project objectives from the FEIS and ROD are shown below in Table 1.

The purpose and need for the project remains valid. There are no new factors or influences that change the deficiencies present in the corridor and what the project should accomplish. Updates to the traffic volume projections were conducted to evaluate whether or not more recent traffic influences, such as regional population growth trends, land use projections, or recreational activity projections, have significant bearing on the project. The revised traffic analysis, as presented in Section VII.L., determined that reasonable growth rates were used in the project's FEIS. However, taking into account more current data, including revised demographic forecasts, traffic growth on similar recreational roads, and extensive transportation planning efforts for the I-70 Programmatic Draft EIS, the rate of growth was slightly increased from 1.5 percent in the 2002 FEIS to 1.7 percent for this reevaluation. This resulted in 2025 traffic volumes that are approximately 8 percent higher than those forecasted under the No Action Alternative in the FEIS. This is still consistent with the original purpose and need and reinforces the project objective of providing a roadway width and surface capable of accommodating 2025 traffic volumes. Therefore, the project decisions related to anticipated traffic volumes remain valid.

Table 1. Objectives of the Guanella Pass Road Improvement Project

<p>Transportation</p> <p>I) Provide a roadway width and surface capable of accommodating year 2025 traffic volumes.</p> <p>II) Improve safety by providing consistent roadway geometry and providing reasonable protection from unsafe conditions.</p> <p>III) Accommodate and control access to Forest Service facilities located along the road.</p>
<p>Maintenance</p> <p>IV) Reduce the anticipated maintenance costs to the counties and town maintaining the road.</p> <p>V) Repair roadway drainage problems.</p>
<p>Environment</p> <p>VI) Repair existing unvegetated slopes.</p> <p>VII) Avoid, minimize, or mitigate adverse impacts to the environment by considering key issues identified through the public and agency involvement process.*</p> <p>VIII) Maintain the rural and scenic character of the road.</p>

*Key Issues for this project were identified as: Social Environment, Water Resources, Visual Quality, Recreational Resources, Plants and Animals, and Construction Impacts.

The needs of the project that are not being met as anticipated in the isolated gravel and macadam portions include the following:

- *Inadequate surface condition:* This project need is not being addressed in spot locations where the surface is prematurely degrading.
- *Safety:* Several of the safety deficiencies are being addressed by providing a consistent width, consistent design speed, increased sight distance, and addition of guardrail. However, the rutting, washboarding, and premature surface failures pose safety concerns in isolated areas.

- *Soil erosion and sedimentation:* This project need is currently not being met in the gravel portions where accelerated erosion is taking place, and will not be met in the future as macadam portions continue to degrade. The erosion and sedimentation lead to adverse impacts to water quality and vegetation resources.
- *Roadway maintenance cost.* This objective is not being met in the gravel and macadam sections due to the accelerated deterioration in these areas. The premature degradation requires increased maintenance efforts and associated costs in order to replace and regrade gravel and macadam portions of the roadway. In addition, increased maintenance of the macadam sections is very important to prevent water from infiltrating the newly constructed subgrade and causing excessive potholing.

V. DESCRIPTION OF ALTERNATIVE 6

As described in the ROD, the selected alternative is Alternative 6, which includes a change in the functional classification of the roadway from a rural collector road to a rural local road. The change in functional classification allows a lower design speed with sharper roadway curves and a narrower roadway width than what was proposed for the other build alternatives. The roadway is constructed to a consistent width of 22 feet (6.6 meters) to include travel lanes 9 feet (2.7 meters) wide and shoulders 2 feet (0.6 meter) wide. In addition, the new functional classification allows for the use of a smaller design vehicle, which enables the design of a roadway containing sharper switchback curvature. Each of these changes in the design criteria permits Alternative 6 to follow more closely the existing roadway. Road surface, safety, drainage, access control, slope stability, and revegetation improvements are included in the roadway reconstruction and rehabilitation areas. Under Alternative 6, approximately 63 percent of the road is rehabilitated, 18 percent undergoes light reconstruction, and 19 percent undergoes full reconstruction.

Several alternative surface types to be used along the route were evaluated in the FEIS. In the ROD, asphalt pavement with a chip seal was selected for 56 percent of the route, macadam for 30 percent of the route, and gravel with a dust palliative for 14 percent of the route. Figure 2 depicts the selected alternative (Alternative 6).

VI. DESCRIPTION OF THE PROPOSED CHANGE

FHWA, therefore, proposes to change one element of Alternative 6 to address these problems and protect the public investment on the project. The proposed change is to surface the gravel and macadam sections of the route and related parking lots with asphalt, with a chip seal overlay to minimize visual impacts. Maintaining the rural and scenic character of the roadway was a priority throughout the EIS process. There would be no other changes to Alternative 6, including the functional road classification, design speed, design vehicle size, amount of reconstruction or rehabilitation, or the construction of special design features or structures. The proposed surface material change would not change the footprint (i.e., extent of physical disturbance) of direct impacts from that previously analyzed in the FEIS. The locations of the proposed surface material changes are presented in Figure 3.

In sections previously constructed during Phase I, the condition of the existing surface material (i.e., gravel or macadam) and base materials would be assessed and rehabilitated as necessary to apply the asphalt. This would involve grading, removing, replacing, or repairing failed base material or subgrade materials as needed. All work would remain in the existing roadway prism.

Figure 2. Alternative 6 as Described in the FEIS and ROD

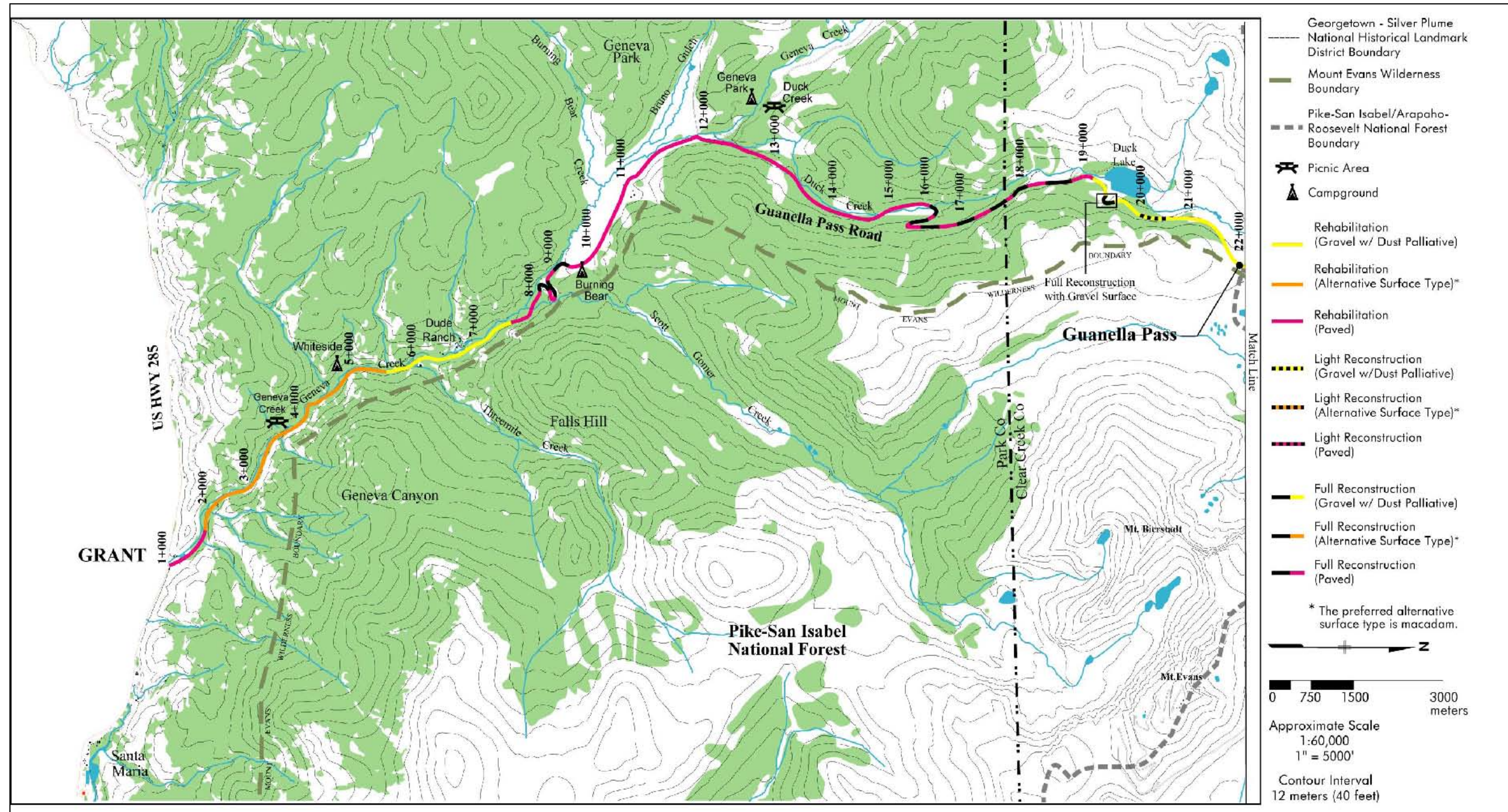


Figure 2 (cont'd). Alternative 6 as Described in the FEIS and ROD

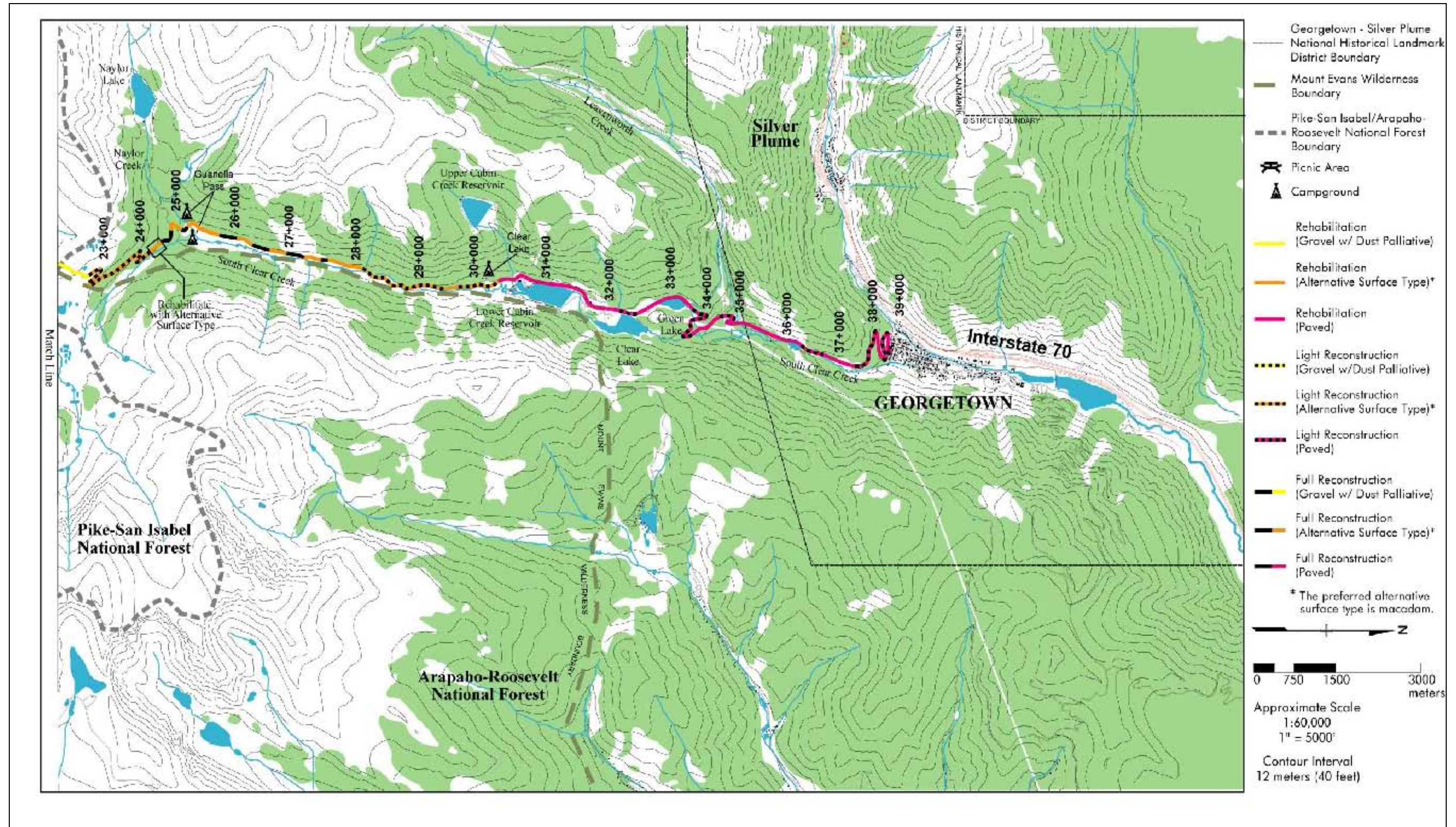


Figure 3. Proposed Changes in Surface Treatment from Alternative 6

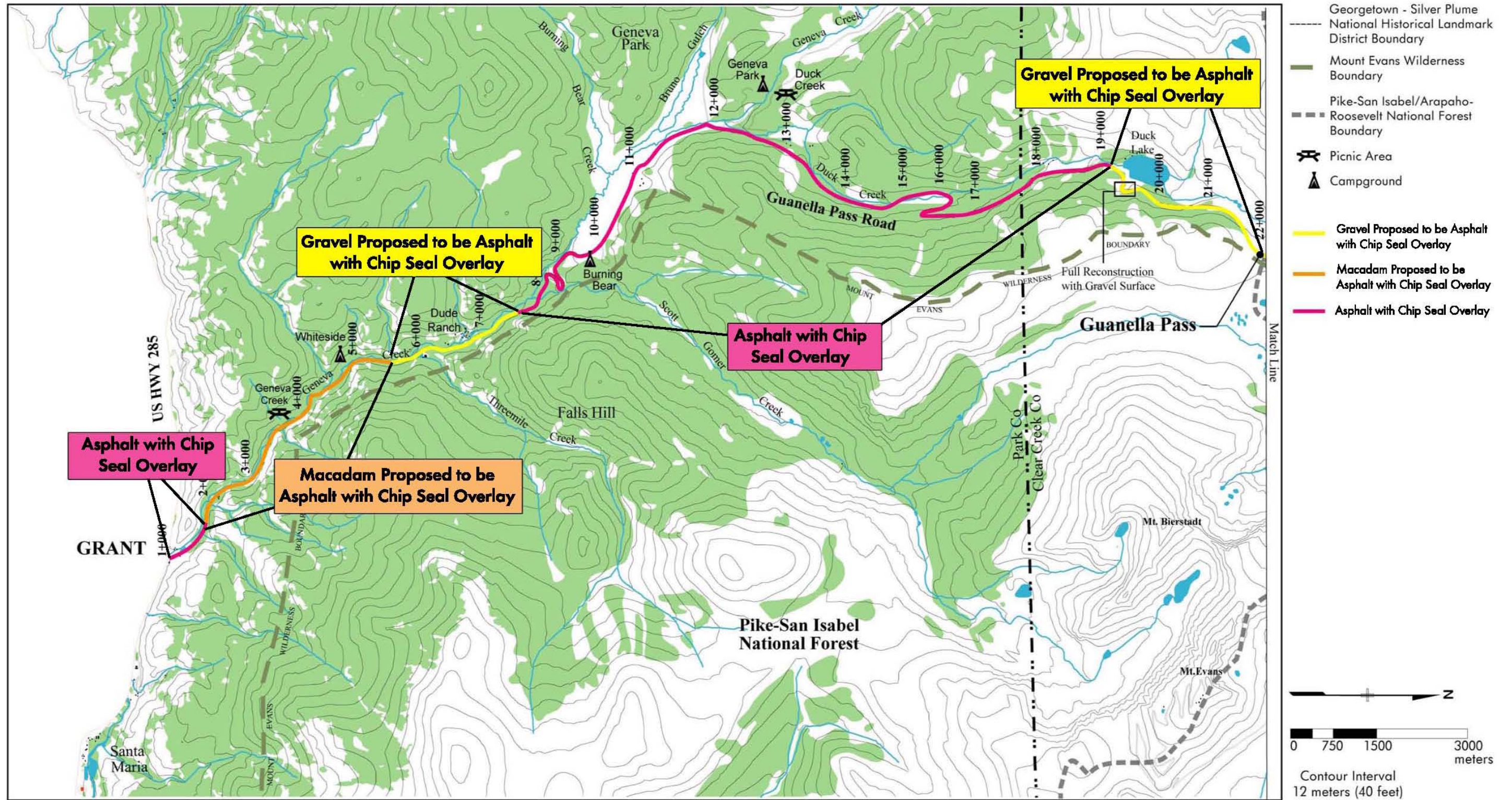
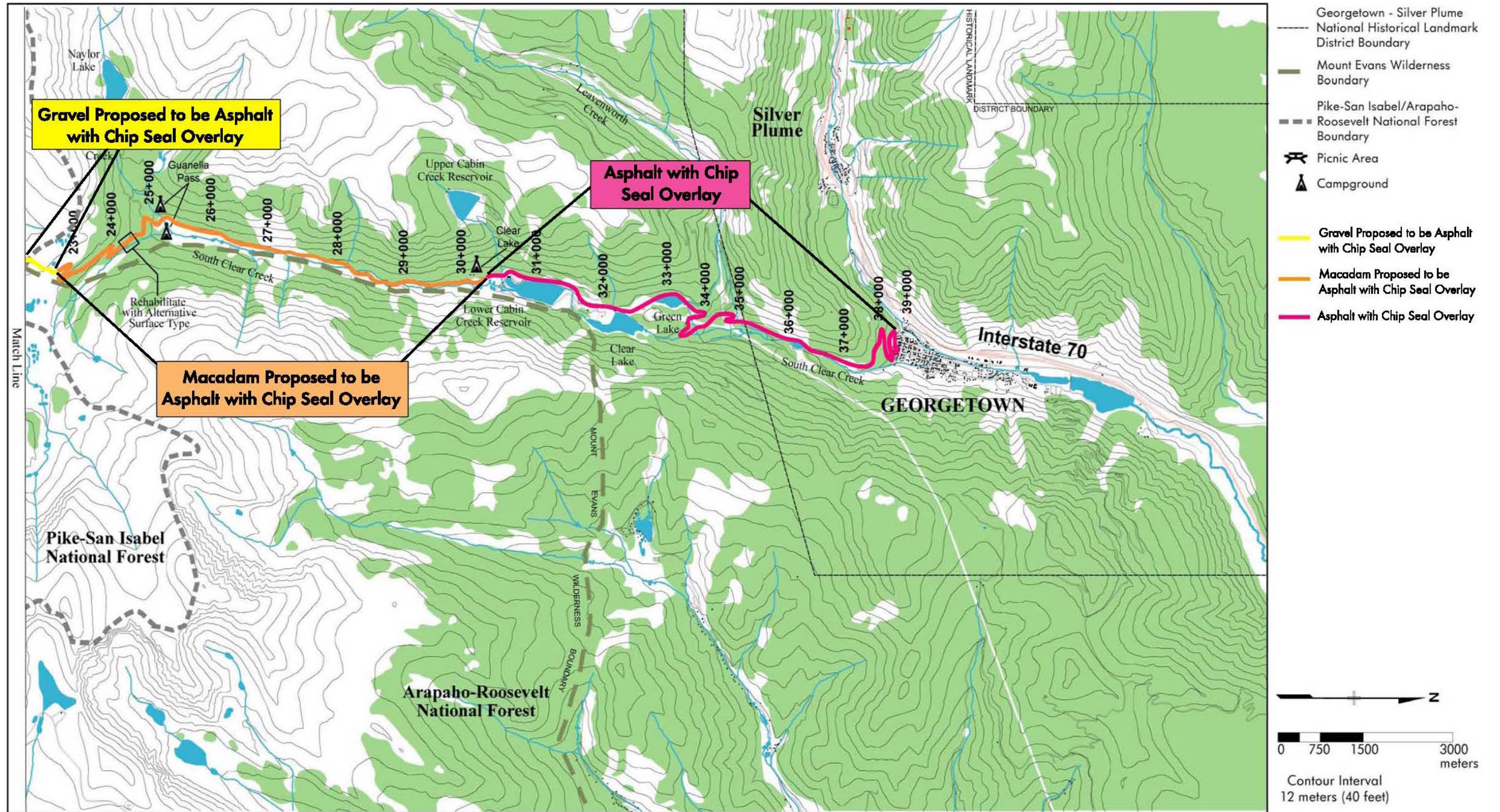


Figure 3 (cont.). Proposed Changes in Surface Treatment from Alternative 6



VII. IMPACTS OF PROPOSED CHANGES

This chapter describes the conditions that have changed since the 2002 FEIS, and it provides revised impacts based on the proposed surface material change. Taking into consideration that the proposed change would occur only in gravel and macadam sections and would not involve construction outside the roadway prism, the conditions in the corridor were updated to the extent necessary to determine if new circumstances (i.e., changed conditions, new information, regulatory changes) relevant to environmental concerns would result in a significant impact not previously evaluated in the FEIS. The intent is also to determine whether or not the original project decisions remain valid, based on current knowledge and conditions.

While an update to existing conditions was necessary for many environmental resources discussed in the FEIS, this review determined there were no additional impacts (or changed conditions) caused by the surface material change to the resources described below.

A. AIR QUALITY

Since the FEIS was published in 2002, a number of new air quality regulations have been promulgated. One of these rules established primary and secondary National Ambient Air Quality Standards (NAAQS) for particles under 2.5 microns in diameter (PM_{2.5}). Both Clear Creek and Park Counties are considered to be an attainment area with respect to PM_{2.5} (as is the entire state of Colorado). Another change to the NAAQS is the elimination of the 1-hour ozone standard, which was replaced with an 8-hour ozone standard. Clear Creek and Park Counties are attainment areas with respect to the ozone standard. As was the case in 2002, both counties continue to be in attainment areas for the remaining NAAQS criteria pollutants. The proposed surface material change is not expected to increase traffic volumes and associated vehicle emissions more than that disclosed in the FEIS; therefore, the determination that vehicle emissions are within NAAQS and do not create health hazards to the public, wildlife, or vegetation still applies. The FEIS also discussed improvements to air quality from reduced dust in areas where gravel sections are improved to a hardened surface. The proposed surface material change would further increase this benefit.

B. NOISE

Noise analyses were conducted for the purposes of the FEIS along eight separate sections of Guanella Pass Road. These analyses evaluated the noise energy produced by traffic based on traffic volume, type of vehicle, speed of vehicles using the roadway, gradient, etc. A traffic volume analysis conducted for the purposes of this reevaluation (Jacobs 2009a) determined that the data does not support additional adjustments to the projected traffic volumes of Alternative 6, as described in the FEIS and ROD because of the proposed change in surface materials. Therefore, there would be no change in predicted noise levels along any portion of the road as a result of traffic volume changes. The traffic analysis also found that any speed increases would be slight (5 miles per hour at most) and would only potentially occur in segments changed from gravel to asphalt. Additional noise analysis performed for the area near Tumbling River Ranch (Jacobs 2009c) found that the additional noise from hauling traffic due to these changes would be barely perceptible. This would not result in perceptible changes to noise levels from that previously analyzed. In addition, the proposed surface material change would not involve any changes to the roadway's vertical or horizontal alignment or vehicle type, which are other factors that could contribute to changes in noise levels. For these reasons, the

proposed surface material change would not cause any changes in the impact determination from that disclosed in the FEIS.

C. HAZARDOUS MATERIALS

The proposed change to Alternative 6 would only affect the surface of the road and would not result in any new ground disturbance from that previously analyzed. There would, therefore, be no changes to the conclusions reached in the FEIS and the best management practices (BMPs) discussed would continue to be implemented. As the FEIS states, further evaluation will continue up to the time of property acquisition and will avoid potentially contaminated sites whenever practical. Where avoidance is not practical, additional site investigation will be conducted and any necessary cleanup plans will be coordinated with the appropriate agencies and landowners.

D. SECTION 4(F) RESOURCES

Since issuance of the FEIS, new regulations were adopted for Section 4(f) properties that clarified the definition of feasible and prudent alternatives and defined a new process for allowing *de minimis* impacts to Section 4(f) properties (CFR 774). The FEIS documented that Alternative 6 would have 4(f) impacts on the Georgetown-Silver Plume National Historic Landmark District (GSPNHLD), two mine tailing sites, and the Guanella Pass campground. The proposed surface material change would not require the use of any additional 4(f) lands, nor would the change alter any Section 106 effect determinations for the GSPNHLD or the mine tailings, nor would the change in definition used for feasible and prudent alternatives alter the original Section 4(f) evaluation in the FEIS. For these reasons, the Section 4(f) Evaluation in the FEIS is unchanged.

E. RIGHT-OF-WAY

There would be no changes to the amount of right-of-way needed to be acquired as a result of the proposed surface material change; therefore, there would be no changes to the analysis as documented in the FEIS.

F. UTILITIES

The proposed surface material change would not occur outside the roadway corridor previously analyzed in the FEIS; therefore, there would be no changes to the utility considerations as discussed in the FEIS.

G. FLOODPLAINS

There would be no changes to the amount or type of work occurring in a floodplain as a result of the proposed surface material change; therefore, there would be no changes to the analysis as documented in the FEIS.

H. FARMLANDS

The FEIS documented through consultation with the Natural Resources Conservation Service that there are no farmlands subject to the Farmland Protection Policy Act within the Guanella

Pass Road study corridor. The area of project disturbance would not change as a result of the proposed change; therefore, there would be no change in the farmlands determination.

I. ENVIRONMENTAL JUSTICE

The FEIS states that minimal right-of-way purchase and no relocations are associated with any alternative. In addition, the Guanella Pass Road improvements do not discriminate on the basis of minority or low-income populations, and none of the build alternatives would disproportionately affect minority or low-income populations. This statement remains valid, and the proposed surface material change makes no change to this determination.

J. COMMUNITY SERVICES

The FEIS discloses the impact on the demand for community services being directly related to the amount of 2025 projected traffic volumes under each of the build alternatives. A traffic volume analysis conducted for the purposes of this reevaluation (Jacobs 2009a) determined that data does not support additional adjustments from the proposed surface material change to the projected traffic volumes of Alternative 6, as described in the FEIS and ROD. Therefore, there would be no change in the resulting demand for community services from that discussed in the FEIS.

K. CULTURAL RESOURCES

Alternative 6 was determined to have an adverse effect on the GSPNHLD (Site #5CC3) from visual impacts on the switchbacks of Leavenworth Mountain. The FEIS analysis found that even if construction traffic were routed through Georgetown, the traffic would not produce vibrations sufficient to damage historical structures along the haul route and would not adversely affect the GSPNHLD. A Memorandum of Agreement (MOA) dated December 10, 2002, included mitigation measures for the visual impacts, and included construction of a bridge at 7th Street for haul traffic, which has already been constructed. The proposed surface material change would not alter previously determined effects to the GSPNHLD because there are no gravel or macadam sections within the GSPNHLD boundary or within view from the GSPNHLD. Therefore, there would be no additional visual impacts from the proposed change. Conditions outlined in the MOA would still apply. The FHWA prepared a *no historic properties affected* determination and the Colorado State Historic Preservation Officer (SHPO) concurred with this determination in a letter dated March 31, 2009.

Construction along the remainder of the roadway related to the proposed surface material change would remain within the footprint analyzed in the FEIS; therefore there would be no change to previously determined effects to any other historic properties listed in or determined eligible for the National Register of Historic Places. The mitigation measures described in the 2003 ROD have been implemented for components of the selected alternative (Alternative 6) already constructed or currently under construction. These measures also would be implemented during construction of future components of the selected alternative. No additional mitigation would be necessary.

Portions of the project were also identified as Traditional Cultural Properties. There would be no change to impacts to these areas as analyzed in the FEIS because there is no change in the footprint of the proposed surface change. Additionally, there is not expected to be any increase in traffic or visitation as a result of the proposed surface changes.

RESOURCES ANALYZED IN FURTHER DETAIL

The following resources were analyzed in further detail to determine whether there might be changed circumstances or additional impacts from the proposed change in surface type:

L. SOCIAL ENVIRONMENT

The FEIS analyzed the effects of the project on the social environment, taking into consideration the community character of the Guanella Pass area, traffic volumes, population and demographics, local economy, land use, consistency with local plans, cultural resources, and traditional cultural properties. The analysis in the FEIS focused primarily on potential increases in traffic and increased use because many of the issues related to the social environment were dependent on these factors. Cultural resources and traditional cultural properties are discussed in the Cultural Resources section of this reevaluation document (VII.K).

1. Changed Conditions

For the purposes of this reevaluation, a traffic analysis was conducted that took into consideration more recent traffic influences, such as regional population growth trends, land use projections, and recreational activity projections, to determine if the methodology used in the FEIS remains valid and to determine if the proposed surface material change could result in substantially different traffic forecasts than previously assumed. More recent population forecasts by the Colorado Division of Local Government, Demography Office, show slightly lower population growth estimates than previously assumed in the FEIS (Jacobs 2009a). In addition, extensive transportation planning has been completed since the 2002 FEIS related to the development of the I-70 Programmatic EIS. The traffic forecasts for the I-70 Corridor show a growth rate higher than originally assumed. Considering the new information from the Colorado population forecasts and the I-70 EIS model, background growth rates were adjusted slightly upward for 2025 traffic forecasts. In analysis, this would have the effect of lessening, by comparison, any additional effects of the project on increased traffic. Despite this increase, a reexamination of the traffic data initially analyzed for the 2002 FEIS and supplementation with more recent and/or relevant data reveals that additional adjustments in traffic projections for the selected alternative with the proposed surface material change is not warranted. Since any changes made as a result of the new traffic analysis would reveal smaller impacts as a result of the project, FHWA determined that the 2025 traffic volume projections presented in the 2002 FEIS would be suitable for additional analysis since they present a more conservative approach to the project impacts (Jacobs 2009a). In summary, the traffic volumes analyzed in the FEIS are probably more conservative than a current traffic analysis would reveal. Since they are more conservative, the FHWA will allow the use of the more conservative numbers and will not revise the original traffic estimates.

Changed conditions that have occurred since the 2003 ROD that may impact land use and consistency with local plans are described in the following sections.

Clear Creek Master Plan 2030

The Clear Creek Master Plan 2030 was adopted in January 2004. There is no specific mention of the Guanella Pass Road in the new plan. On a transportation map contained within the plan, the road is shown as a Primary county road, which is defined as “through roads and

connections carrying heavy traffic flow into and out of subdivisions and various sectors of the County. Primary roads can have either asphalt surface and/or gravel surface and are graded and drained.” (Jacobs 2009b) The Master Plan Sub-Area Map in the plan shows the northern segment of Guanella Pass Road falling within the Georgetown/Silver Plume sub-area, and the southern portion of the roadway within the Mt. Evans sub-area. There are no sub-area plans for these in the plan.

The Master Plan Map displays planned land use for the northern portion of the corridor encompassing approximately three miles of the roadway between Clear Lake and the southern end of the Georgetown town limits as Large Lot Residential with a Remote Area Management Overlay. Another area with similar planned land use is located south of Duck Lake. Large Lot Residential refers to single-family homes on lots of five acres or less. The Remote Area Management Overlay designates areas with physical constraints, such as elevation and slope characteristics, that make development problematic. The remainder of the corridor is designated Public Lands. Land ownership of these areas is a mix of public and private, including a large parcel owned by Xcel Energy. Clear Creek County planning officials stated that these areas required additional approvals prior to any development occurring on the land. No activity to obtain these approvals has occurred.

New Clear Creek County Approved Zoning Map in March 2009

Discussions with Clear Creek County planning officials confirmed that they are in the process of updating zoning throughout the county. A new zoning map was recently approved by the Board of County Commissioners for the northern portion of the Guanella Pass Corridor, which included an initial zoning of all public lands. The new zoning designations are “Natural Resource—Conservation/ Preservation District” and “Natural Resource – Reserved.” Although the zoning designation for the public lands has changed, this does not impact how the FS manages the land. Planning officials also confirmed that there had been no changes in the zoning or use of private lands in the corridor in a long time, and no changes were expected in the near future. The current zoning of private lands along Guanella Pass Road consists predominantly of “Mining One” (M-1) and “Mining Two” (M-2) in the area just south of the Georgetown town limits, and a large piece of property owned by Xcel Energy that is zoned “Mountain Residential – Single Family Units” (MR-1). Additionally, a large area surrounding Duck Lake is zoned “Commercial One” (C-1).

Town of Grant Zoning Change

Discussions with Park County planning officials revealed that the Town of Grant had requested its “Rural Center” status be dissolved, which was approved by the Board of County Commissioners in January 2009. This reduces the likelihood of new development in and around Grant. Current zoning of the lands surrounding Grant and north through the corridor to the Park County line includes “Conservation—Recreation” (CR), “Agricultural” (A), “Commercial” (C), and “Residential” (R).

Winter Closures of Guanella Pass Road

The Guanella Pass Road was barricaded for the winter of 2007/2008 from Duck Lake Picnic Ground (station 12+300) in Park County, to the Silver Dollar Road in Clear Creek County (station 24+600). Although this action can vary by county administration, it is consistent with the fact that the road is not designed to remain open in the winter. This is due to the inability to plow because of a lack of snow storage, narrow alignment, and the high elevation of the road.

Implementation of the Guanella Pass Scenic and Historic Byway Corridor Management Strategy (CMS)

The CMS was released in November 2001 as a planning tool that would provide a vision for the future management of the corridor. The FEIS was not analyzed for consistency with the CMS because it was not a decision document that would result in specific actions. Since that time, a number of the recommendations proposed within the CMS have been implemented through National Forest planning or within the early phases of the Project.

2. Revised Impacts

The Traffic Technical Memo (Jacobs 2009a) determined that the changes due to a change in surface type would cause no additional increases to traffic. It did indicate that there may be slight (~5 miles per hour) increases in the previously gravel sections; however, this increase is within the traffic speeds analyzed in the FEIS. Therefore the change in surface type does not result in new significant impacts regarding traffic volumes or speed.

The proposed change in surface type from gravel or macadam to asphalt with chip seal would be consistent with the Clear Creek Master Plan 2030 (as it was with the previous Clear Creek County Master Plan), and it would continue to be consistent with directives from the Town of Georgetown Comprehensive Plan. The Park County Comprehensive Plan encourages the county to seek to optimize investments by other public sector institutions and states that the county should work with state and federal agencies to maintain and upgrade facilities such as Guanella Pass Road in the county. The changed surface material of the road would reduce the maintenance needs of the roadway and the burden of this on the County.

The FS Land and Resource Management Plans applicable to the project corridor contain goals and objectives that relate to reducing dust and sedimentation in water resources resulting from roadways. The proposed change in surface treatment is expected to achieve these goals to a greater degree than was expected in the FEIS. Therefore, the proposed change in action is consistent with the goals and objectives of these plans. The general recommendations of the Guanella Pass Scenic and Historic Byway Corridor Management Plan would not be precluded by the use of asphalt with chip seal overlay over the entire length of the roadway. A recommendation on which the Scenic Byway Committee was not able to come to consensus involved the question of surface types. Two separate proposals were included in the plan, both of which called for a combination of stabilized and unhardened surface types. These proposals appear to be in conflict with the proposed change to fully pave the roadway. However, the use of asphalt with a chip seal overlay would provide a similar visual appearance to the macadam and the only notable visual difference would be in the 3.2 miles of roadway previously selected to be gravel.

Because projected traffic volumes are not expected to increase as a result of the proposed surface material change above that was previously analyzed in the FEIS, no induced residential or commercial growth is anticipated (Jacobs 2009a and b). There is also limited development pressure as a result of the continued likelihood for winter closures into the future because of the snow removal limitations inherent with the design of Alternative 6. Future residential or commercial growth in this corridor would primarily be a function of Park County or Clear Creek County policies related to development of private lands in the corridor.

Impacts to community character as a result of the proposed surface material change are not expected to differ from those previously discussed in the 2002 FEIS because projected traffic volumes are not expected to increase. In addition, there were concerns raised that the use of

asphalt along the entire length of Guanella Pass Road would promote the use of the roadway as a connector route between I-70 and US 285. In response to this concern, a traffic analysis was conducted for this reevaluation that compared travel times between Georgetown and metropolitan Denver along I-70 in both congested and uncongested conditions, and along the alternate path of Guanella Pass to US 285 in congested and uncongested conditions. The analysis revealed that even when I-70 is experiencing severe congestion, Guanella Pass Road does not offer a shorter travel route to metropolitan Denver from Georgetown (Jacobs 2009a). Although some people frustrated by I-70 traffic may take the road with the thought that it will be shorter, it is still a slow-moving, winding, and steep road and will take between 30 minutes and an hour longer than the trip via I-70. Short-term effects to community character are discussed in the Construction Section (VII.Q.) of this reevaluation.

Local economic impacts were discussed in the 2002 FEIS mainly related to the potential for increased traffic volumes and resulting increased congestion, parking, and traffic flow problems and stopped vehicles in Georgetown, Grant, and Bailey. Because the proposed surface material change is not expected to increase traffic volumes in these municipalities, no changes to the economic impacts presented in the FEIS are anticipated. Construction traffic is discussed in section VII.Q.

Consideration was also given in the FEIS to the potential impact of paving on the dude ranch business located along Guanella Pass Road. A survey of several members of the Colorado Association of Dude and Guest Ranches revealed that it cannot be conclusively stated that any of the build alternatives would or would not adversely impact the dude ranch business. The proposed surface material change falls within actions previously analyzed and, therefore, there would be no change from the information presented in the 2002 FEIS.

3. Mitigation Measures

The mitigation measures described in the 2003 ROD have been implemented for components of the selected alternative (Alternative 6) already constructed or currently under construction. These measures also would be implemented during construction of future components of the selected alternative. This includes measures to alleviate economic impacts that may occur during construction. No additional mitigation would be necessary.

M. RECREATION

As described in the FEIS, Guanella Pass receives large numbers of recreational visitors, partially because of its proximity to the Colorado Front Range. The Guanella Pass area is popular for hiking, fishing, aspen-viewing, and for scenic driving. This leads to concerns with crowded conditions, especially around Mt. Bierstadt, and parking and camping issues. The FEIS examined the uses of Guanella Pass in terms of recreation, as well as parking and pedestrian and bicycle use. The 2003 ROD also recognized potential concerns regarding horse trailing along the road near Tumbling River Ranch and included mitigation measures to reduce these impacts.

1. Changed Conditions

Recreation use regionally and in Colorado has been steadily increasing and is expected to continue increasing in the future in a manner that is not linked to roadway improvements. The 2007 Colorado State Comprehensive Outdoor Recreation Plan (SCORP) measures outdoor recreation throughout the state. It shows a trend of large increases in the recreational activities popular in the project corridor between 1995 and 2006, roughly the time period between the

original data in the FEIS and the time of this re-evaluation. These increases include a 17 percent increase in sightseeing, a 45 percent increase in day-hiking, a 68 percent increase in backpacking, a 58 percent increase in developed camping, and a 29 percent increase in primitive camping. These numbers could be more pronounced for the project corridor because of factors noted in the SCORP and in the FEIS, including the proximity of the project area to the large population centers of the Front Range, the easy access from I-70, and the popularity of the destinations such as Mt. Bierstadt and Mt. Evans. Officials with the two National Forests confirmed the increase in use in the area; however, no actual data is available for the recreational facilities in the corridor.

In association with the Phase I roadway reconstruction, new facilities were constructed at Guanella Pass to serve the multiple trailheads located in the area and to address resource concerns resulting from recreation that has exceeded the capacity of the area. These facilities included parking areas and toilets.

In June 2005, the Forest Service released a FONSI for the Guanella Pass and Silver Dollar Roads Area Recreation Management/Development Projects. This decision included numerous management activities that would alter recreation use throughout the Guanella Pass corridor. The Environmental Assessment (EA) was completed for the corridor in order to address what it described as dramatic increases in recreation use along the corridor in response to social change and pressure for recreation opportunities for the expanding population of the Front Range and the mountain towns along the I-70 Corridor.

This FONSI resulted in changes to management and development in the corridor:

- Develop a designated dispersed camping area of approximately 10 sites at Clear Lake Reservoir utilizing the existing day-use parking, toilet and the user-created campsites, and associated trails.
- Reconstruct the existing sites at the Clear Lake Campground and add approximately 7 walk-in tent campsites and their associated parking, and modify existing campsites to fit the new design within the existing campground.
- Develop a designated dispersed camping cluster with approximately 10 to 15 campsites and a vault toilet, where dispersed camping is already occurring approximately one mile south of Clear Lake Campground for campers, and expand the day-use picnic area across the road.
- Add approximately 5 walk-in campsites at the Guanella Pass Campground.
- Close and rehabilitate all other dispersed sites that are not designated within the corridor.
- Improve and formally designate approximately 8 existing, dispersed campsites on the Silver Dollar Lake Road.
- Establish a seasonal road closure to reduce damage to the roadway during the thawing period on Silver Dollar Lake Road.
- Implement and enforce Regulatory Actions through a USFS Closure Order to close or restrict use of the described area and signing will be put in place to educate and inform the public about new regulations including camping allowed only in developed campgrounds or formally designated dispersed camping sites, parking allowed only in designated parking, picnicking, or dispersed camping areas, and campfires allowed only in specified fire rings all within one-quarter mile of either side of the Guanella Pass and Silver Dollar Lake Roads.

Only a few of these management directives have been implemented because of funding, and the construction occurring along the road keeps it from being an issue.

Associated with the dispersed camping closure, the construction of Phase I improvements on the roadway included guardrails and a slightly raised profile of the roadway that has reduced the ability of users to pull off and camp in the area. This has also reduced dispersed camping.

The Arapahoe National Forest Clear Creek Ranger District expanded parking in the area of the Silver Dollar Road turnoff to accommodate approximately 20 vehicles for day-use recreation.

2. Revised Impacts

There is no reason to believe there will be any change in recreation activity or numbers of visitors because of the proposed change in surface treatment for a very short gravel section, constituting 3.2 miles out of a total 23.5 miles of road that have been or will be reconstructed. The asphalt with chip seal on top will be perceived the same as macadam and, therefore, not likely to affect public perceptions.

In addition, resource management will improve as a result of the roadway improvements, such as curbing and pull-out construction, which will help to regulate dispersed recreation activities. As funding for implementation becomes available, implementation of the actions associated with the FS FONSI for the Guanella Pass and Silver Dollar Roads Area Recreation Management/Development Projects will regulate recreation use in the area to a greater degree and provide additional protection for the biological resources of the area.

3. Mitigation Measures

The mitigation measures described in the 2003 ROD have been implemented for components of the selected alternative (Alternative 6) already constructed or currently under construction. These measures also would be implemented during construction of future components of the selected alternative. No additional mitigation would be necessary.

N. VISUAL QUALITY

Visual impacts disclosed in the FEIS were described in terms of views from the roadway and views of the roadway and considering the visual design criteria for the project. The visual design criteria for the project included road visibility, scenic quality, and the landscape sensitivity. Long-term impacts included the permanent changes to the visual character of the area from alignment changes; cut and fill slopes; landscaping changes; addition of special design features; addition of structures, such as retaining walls and guardrails; and changes to the road surfacing material. Short-term visual impacts during construction were also discussed in the FEIS in the Construction section.

1. Changed Conditions

The overall look and feel of the Guanella Pass corridor is the same as was described in the FEIS. The primary changed conditions in the project area are those that have been constructed during Phase I and Phase II of this project. In areas where construction has occurred, several of the impacts discussed in the FEIS can be visually observed along the roadway. The roadway's alignment and cut and fill slopes have changed in some areas, with the most drastic changes occurring in full reconstruction areas. This gives the road a more open look and feel compared to its previous state. The reduced road classification and design vehicle size allows the road to closely follow the previous alignment so most of these changes are kept to a minimum. The

most noticeable of the visual changes that have occurred along the roadway are the addition of structures that did not previously exist. These structures, including rockery cut walls, retaining walls with rock facing, and steel-back timber guardrails, were designed in coordination with interested parties keeping the rustic and scenic quality of the roadway and surroundings in mind. As a result, these features were successfully designed and constructed to be aesthetically pleasing and visually compatible with the surrounding environment. Other changes to the visual environment include surface changes in Phase I and Phase II, landscaping improvements that have been implemented, and short-term construction impacts that may be evident in the corridor.

2. Revised Impacts

Impacts to visual quality would be the same as described in the FEIS, with the exception that additional sections of the roadway would be surfaced with asphalt with a chip seal overlay. The chip seal applied over the asphalt would offer a similar visual appearance as the macadam so there would be no noticeable visual impact once the chip seal is applied. Color variations may exist depending on the source of the aggregate material. A visual change in areas where gravel was previously selected, which is about 3.2 miles in total, would be noticeable. This includes the area near the Tumbling River Ranch, which has not yet been constructed. The chip seal overlay would help offset the visual impacts to give this section of the road a more rural appearance than if simply asphalt pavement were used, and the use of a hardened surface in general would eliminate any dust that occurs from vehicles driving on a gravel surface. In addition, the use of a consistent surface material throughout the corridor may be perceived as a visual benefit to some drivers.

3. Mitigation Measures

The mitigation measures described in the 2003 ROD have been implemented for components of the selected alternative (Alternative 6) already constructed or currently under construction. These measures also would be implemented during construction of future components of the selected alternative. Striping of the road was brought up at both public meetings. The public does not want the road striped, to maintain the rustic character of the road. The FHWA will not stripe either the centerline or the fog lines (the white stripes along the sides of the road) at this time. This issue may be revisited if necessary, depending on safety concerns.

O. WATER RESOURCES

As reported in the 2002 FEIS, the South Fork of Clear Creek and Geneva Creek, along with their tributaries, are the primary water bodies in the project area. Water quality was a key issue identified during the EIS process and was an element of the purpose and need for the project. Both adverse and beneficial impacts from the project were discussed. More specifically, impacts were discussed in terms of the following subcategories: erosion of new slopes, repair of existing erosion/sedimentation problems, deicing salts, roadway contaminants, dust, dust control chemicals, and accidental spills.

1. Changed Conditions

The designated beneficial use for one of the water bodies in the project area has changed since publication of the FEIS. The designated uses for the remaining water bodies remain the same, although the terminology of the classification has changed slightly. The mainstem of Geneva Creek, from the source to the confluence with Scott Gomer Creek, was previously classified as Class 1 Cold Water Aquatic Life and Class 2 Recreational and is now classified as Aquatic Life

Cold 1, Primary Contact Recreation, and Agriculture (CDPHE 2008). The current designated uses are listed below in Table 2.

Table 2. Designated Use Classifications for Water Bodies in Project Area

Waterbody ID	Assessment Unit Name	2002 FEIS Designated Uses	Current Designated Uses
COSPUS05A	Geneva Creek above Scott Gomer Creek	Aquatic Life Cold 1, Recreational Class 2	Aquatic Life Cold 1, Primary Contact Recreation, Agriculture
COSPUS05B	Mainstem of Geneva Creek from Scott Gomer Creek to North Fork of South Platte River	Aquatic Life Cold 1, Recreational Class 1, Water Supply, Agricultural	Aquatic Life Cold 1, Primary Contact Recreation, Water Supply, Agriculture
COSPCL03A	Mainstem of South Clear Creek, including all tributaries	Aquatic Life Cold 1, Recreational Class 1, Water Supply, Agricultural	Aquatic Life Cold 1, Primary Contact Recreation, Water Supply, Agriculture
COSPCL03B	Mainstem of Leavenworth Creek from source to confluence with South Clear Creek	Aquatic Life Cold 2, Recreational Class I, Water Supply, Agricultural	Aquatic Life Cold 2, Primary Contact Recreation, Water Supply, Agriculture

The Water Quality Control Commission (WQCC) of the Colorado Department of Public Health and Environment (CDPHE), under Regulation 93, generates a list of impaired water bodies requiring a Total Maximum Daily Load (TMDL) to fulfill section 303(d) of the federal Clean Water Act. 303(d) status means water quality within the segment must be improved and not further degraded. In the 2002 FEIS, the only stream segment listed on the state 303(d) list was Geneva Creek from the confluence with Scott Gomer Creek to the confluence with the North Fork of the South Platte River. This stream segment was listed because of impairment from zinc and metals contamination. As stated in the FEIS, the FS also recommended to the CDPHE in July 2002 that sediment be recognized as another source of stream impairment.

The state 303(d) list has been updated since the 2002 FEIS and the status has changed for stream segments in the project area. Three of the four stream segments in the project area are now listed on the 2008 Section 303(d) List of Impaired Water (see Table 3). According to the *Status of Water Quality in Colorado—2008* (CDPHE 2008), additional impaired water bodies have been identified in the state due to changes in the 303(d) listing methodology, changes in Regulation 31, The Basic Standards and Methodologies for Surface Water, and increased monitoring. Because Geneva Creek from the confluence with Scott Gomer Creek to the confluence with the North Fork of the South Platte River is carryover from the 1998 303(d) list for zinc, it is considered high priority for the state. The two other stream segments on the current 303(d) list are considered medium priority.

Table 3. Water-Quality-Limited Segments Requiring Total Maximum Daily Loads

Waterbody ID	Segment Description	Portion	Impairment	Priority
COSPUS05B	Mainstem of Geneva Creek from Scott Gomer Creek to North Fork of South Platte River	All	Zinc	High
COSPCL03A	Mainstem of South Clear Creek, including all tributaries	All	Zinc	Medium
COSPCL03B	Mainstem of Leavenworth Creek from source to confluence with South Clear Creek	All	Zinc	Medium

Source: CDPHE 2008 303(d) List

WQCC Regulation 94 requires the preparation of a statewide monitoring and evaluation list. Water bodies on the monitoring and evaluation list are suspected as having water quality issues, but the cause of the water quality impairment is not certain. Two stream segments within the project area are now listed on Colorado's Monitoring and Evaluation List (CDPHE 2008b). These include Geneva Creek above Scott Gomer Creek, which is listed for cadmium, copper, and zinc, and the mainstem of Geneva Creek from Scott Gomer Creek to the North Fork of the South Platte River, which is listed for sediment.

2. Revised Impacts

The FEIS discussed the effectiveness of the action alternatives in reducing erosion and sedimentation being proportional to the amount of surface hardening, as well as the level of reconstruction. The revised status of water quality conditions in the area described above makes it even higher concern to prevent further degradation of stream segments within the project area. As reported in the FEIS, an extensive US Geological Survey study and a FS study identified sedimentation problems from several sources, including erosion from roadway runoff. Although several of the other erosion problems, such as unstable cut and fill slopes and drainage features, are being addressed by the project and are evident in constructed segments, the anticipated benefits from surfacing the roadway with macadam and gravel are not being fully realized. This is the only notable area for which there would be revised impacts from that presented in the FEIS. The surfacing of the gravel and macadam sections along the route, especially near Tumbling River Ranch, would improve the erosion and sedimentation problems and result in a beneficial effect to water resources.

Other water resources discussed in the FEIS include wetlands, riparian communities, and other waters of the US. The proposed surface material change does not involve any modifications to the alignment of the roadway; therefore, there would be no change in the direct impacts as previously analyzed for Alternative 6. The benefits to water quality from reduced sediment runoff and reduced maintenance activities would also occur to wetland and riparian communities.

3. Mitigation Measures

The mitigation measures described in the 2003 ROD have been implemented for components of the selected alternative (Alternative 6) already constructed or currently under construction. These measures also would be implemented during construction of future components of the selected alternative. No additional mitigation would be necessary.

P. PLANTS AND ANIMALS

The FEIS analyzes impacts in general to plants and animals, and to Threatened, Endangered, and Sensitive (TES) species specifically. Impacts analyzed include increased traffic or traffic speed, effects to wildlife crossings and increased wildlife/vehicle interactions, and disturbance of plant and wildlife habitat. A Biological Assessment stated that the project may adversely affect the Canada lynx (*Lynx canadensis*). Adverse impacts were not found to be likely for any other TES species. Formal consultation was completed with US Fish and Wildlife Service (USFWS) in 2002. This included a Biological Opinion related to the Canada lynx.

1. Changed Conditions

Changes to USFWS Threatened, Endangered, and Candidate Species List

Since the completion of consultation for this project, changes to the USFWS list of threatened, endangered, and candidate species have occurred. The current list for Clear Creek and Park Counties includes the following species:

- Canada lynx (*Lynx canadensis*), Threatened
- Greenback cutthroat trout (*Oncorhynchus clarki stomias*), Threatened
- Least tern (interior population) (*Sternula antillarum*), Endangered
- Mexican spotted owl (*Strix occidentalis lucida*), Threatened
- Pallid sturgeon (*Scaphirhynchus albus*), Endangered
- Piping plover (*Charadrius melodus*), Threatened
- Whooping crane (*Grus americana*), Endangered
- Pawnee montane skipper (*Hesperia leonardus montana*), Threatened
- Penland alpine fen mustard (*Eutrema penlandii*), Threatened
- Uncompahgre fritillary butterfly (*Boloria acrocneuma*), Endangered
- Gunnison's prairie dog (*Cynomys gunnisoni*), Candidate

Of these species, only the Gunnison's prairie dog is newly listed. All other species were previously analyzed.

Water Depletions Consultation Procedures

The USFWS has implemented a new procedure for the analysis of water depletions since the project was previously analyzed. The Platte River Recovery Implementation Program (PRRIP), established in 2006, implements actions designed to assist in the conservation and recovery of the target species (the least tern, piping plover, pallid sturgeon, and whooping crane) and their associated habitats along the central and lower Platte River in Nebraska through a basinwide cooperative approach agreed to by the states of Colorado, Nebraska, and Wyoming, and the US Department of the Interior. The Program addresses the adverse impacts of existing and certain new water-related activities on the Platte target species and associated habitats, and provides Endangered Species Act (ESA) compliance for effects to the target species and whooping crane critical habitat from such activities including avoidance of any prohibited take of such species. The threshold for additional analysis was changed from 25 to 0.1 acre-foot per year. Since this project will require the use of more than 0.1 acre-foot of water, the FHWA is undergoing additional consultation with USFWS for water depletions.

Forest Service Sensitive Species List Additions

The FS has also added species to its list of sensitive animal species. See Appendix A for a full listing of FS sensitive species. Since the change in surface type will take place within the

existing roadway prism, it is not anticipated to have any effects on sensitive species or their habitats.

Forest Service Sensitive Plants

Based upon site visits in summers 2003 to 2008 and past survey reports, there are four sensitive plant species known to occur in the general project area; however they occur beyond the project footprint and will not be impacted by the project.

Wildlife Considerations Incorporated into Design

In addition to mitigation commitments made in the FEIS, such as minimizing disturbance and revegetation, and limiting construction in some areas to daylight hours, additional wildlife considerations were incorporated into the original project design. These measures were not part of the original analysis in the FEIS. Wildlife considerations were coordinated with Colorado Division of Wildlife (CDOW) and FS biologists. Design features include several measures to facilitate wildlife crossings, such as wall height reductions, the addition of gaps in the guardrail, and berms and boulders added to allow access to crossing areas. Special logs were added to direct boreal toads to suitable crossing locations, and three open-bottom box culverts were included to allow for terrestrial and aquatic organism passage.

Completion of the Southern Rockies Lynx Management Direction ROD

The Southern Rockies Lynx Management Direction ROD was signed in October 2008 well after the 2003 ROD. It contains consistent management direction to conserve the Canada lynx (*Lynx canadensis*) in the Southern Rocky Mountains, incorporating the terms and conditions contained in the USFWS 2008 Biological Opinion (BO). This ROD identifies 18 management practices and activities that are required for human use projects that include highways. The management practices and activities that are most germane to the project, along with information related to how each objective or guideline applies to the project, are included here:

- *Objective HU 01: Maintain the lynx's natural competitive advantage over other predators in deep snow, by discouraging the expansion of snow compacting areas in lynx habitat.*

The design of Guanella Pass Road makes snow removal difficult because there are not areas along the road to store the snow. The two counties who maintain the road have decreasing maintenance budgets and currently barricade upper portions of the road to vehicles in the winter. In addition, the FS has committed to closing the upper parking lot with gates, if the county does not close the road. All of these actions will discourage the snow compaction by controlling vehicular use of the road in the winter.

- *Objective HU 06: Reduce adverse highway effects on lynx by working cooperatively with other agencies to provide for lynx movement and habitat connectivity, and to reduce the potential for lynx mortality.*

The Guanella Pass Road has been specifically designed to accommodate lynx movement. Walls and guardrail designs have been modified to reduce wall heights, provide for gaps in guardrails are provided, and berms and boulders adjacent to walls are provided so the lynx can use them to get over the walls.

- *Guideline HU 06: Methods to avoid or reduce effects to lynx habitat connectivity should be used when upgrading unpaved roads to maintenance levels 4 or 5, where the result would be increased traffic speeds and volumes, or contribute to development or increases in human*

activity. (Note: This guideline is a recommended management action that will normally be taken to meet Objective HU 06 but is not required.)

Analyses of traffic data indicate that the paving of the gravel and macadam sections of the Guanella Pass Road will not result in increased traffic volumes. Increases in traffic speed may occur on the gravel sections, but they are most likely to occur at the top of the pass where human use is highest during the day in the summer, when the lynx movement is likely to be the lowest. The proposed surface change to gravel on the Grant side of the road does not fall within potential lynx crossing areas.

The human activity at the top of the pass is because of the parking areas and trailheads. Paving of the macadam and gravel sections of the road will not result in increased human activity. The FS plans to control winter recreational use by closing the upper parking lot with gates, if the Counties are not closing the road.

Decision by the FS to Close Dispersed Camping

In 2005, the FS issued a decision to close the dispersed camping that was occurring along Guanella Pass Road. Most of the dispersed camping that was occurring was along South Clear Creek. Camping is now allowed only in designated, developed campgrounds. This closure is not currently being enforced because the construction occurring along the road is preventing it from being an issue. This decision directly benefits the lynx by reducing human activities in potential habitat.

Implementation of Terms and Conditions Contained in the BO

The final changed condition since the January 2003 ROD is that all of the terms and conditions that were in the BO have been or are being implemented, including:

- Specific construction techniques have been used to maintain the existing forest cover along the road between the Guanella Pass Campground and Geneva Park, including minimizing ditch widths and utilizing low dry stack cut walls to minimize impacts.
- The project team developed specific slope stabilization and revegetation specifications to reestablish tree and shrub cover as close to the reconstructed road as possible.
- No construction activity has been occurring or will occur in potential lynx areas during dawn, dusk, and nighttime hours.
- All Duck Lake borrow site activity occurs during daylight hours.
- The road has been designed to specifically prevent parking in undesignated locations.
- Specific techniques have been implemented to make sure guardrail and retaining walls are less of a barrier to lynx movement by providing a bench at the top of the wall behind the guardrail and using guardrail gaps and boulder ramps at key locations.
- Borrow sites are being or have been contoured and revegetated.
- The counties have been barricading the road to preclude use of the new parking area during the winter months. In addition, the FS has committed that they would close the upper parking lot with a gate in the winter, if the Counties do not close the road.

2. Revised Impacts:

In 2008, the Gunnison's prairie dog (*Cynomys gunnisoni*) became a candidate species for official listing as threatened or endangered. It is the only listed species not previously analyzed for this project. The project area does not include suitable habitat for this species; therefore, the project will have no effect on this species.

Our analysis of the proposed change in surface treatment indicates that the change would not result in effects different in the magnitude or extent from those previously considered in the Biological Assessment (BA) or BO for the following reasons:

- The road footprint will not be widened from that identified in the BA or BO so there would be no additional habitat loss.
- Projected future traffic volumes due to the paving of the gravel and macadam sections remain consistent with those predicted for the selected alternative in the ROD and are not expected to increase.
- The change in pavement type will only be perceptible in the gravel sections, which constitutes 3.2 miles out of a total of 23.7 miles. This is not expected to result in any increased human activity.
- Traffic modeling indicates that traffic speeds may increase slightly in sections being changed from gravel to asphalt with chip seal (up to 5 miles per hour at most), but not at times of the day or year that correspond to lynx usage. In addition, the areas of speed increase are not located in known lynx linkage areas.
- The terms and conditions in the BO have been or are being implemented. Additional mitigations were included in the final design and were implemented.
- Winter closures of the road have been implemented in the past two winters.
- The FS has taken action to control dispersed camping.

The FS conducted additional analysis of the FS Sensitive plants in response to the proposed change in surface type. Of the four plants found within the project area, their occurrences are all well away from the area that would receive re-surfacing. The road shoulders immediately alongside the proposed resurfacing area have been surveyed repeatedly for moonworts and none have been documented. The local area does not support habitat for the other two sensitive plants. It is possible that project area road shoulders could contain moonworts, but the action would not disturb areas far enough away from centerline to impact potentially-occurring moonwort plants. There are no indirect effects anticipated to other sites containing sensitive plants in the project area. No occupied moonwort habitat would be disturbed or removed.

Determination of Effects/Impacts:

The proposed changes will have no effect on federally listed species. FWS concurred in a letter dated May 13, 2009. The proposed changes will have no impact on FS sensitive plant or animal species, with the possible exception of those species affected by water depletions. The proposed changes will result in no new significant impacts on listed or sensitive plant or animal species.

The impacts to Canada lynx habitat resulting from the proposed modifications to the surface type will have no effect on the Canada lynx; therefore, formal consultation with the USFWS does not need to be reinitiated.

As a result of a change in standards for consultation, the FHWA will consult with USFWS on water depletions for Phases I, II and III of the project, in addition to consultation for water use due to the proposed surface changes. Water use for Phase II and the proposed surface changes may affect, and is likely to adversely affect, the least tern, piping plover, pallid sturgeon, and whooping crane. The FHWA anticipates that water for Phase II and the proposed surface changes will continue to be available from a member of the South Platte Water Related Activities Program, Inc. (SPWRAP), and consultation can be completed under the Platte River Recovery Implementation Program Programmatic Biological Assessment (BA). A template BA has been submitted for the least tern, piping plover, pallid sturgeon, and whooping crane for Phases I and II and for the surfacing changes. The FHWA has not yet determined a viable water source for use on Phase III of the project. Phase III is currently scheduled for construction in 2012. The FHWA commits to complete additional consultation for water depletions on Phase III prior to construction.

3. Mitigation Measure

The mitigation measures described in the 2003 ROD have been implemented for components of the selected alternative (Alternative 6) already constructed or currently under construction. These measures also would be implemented during construction of future components of the selected alternative. No additional mitigation would be necessary.

Q. CONSTRUCTION IMPACTS

1. Changed Conditions

Town of Georgetown

The FEIS estimated approximately 2010 truck round-trips through Georgetown over the course of the construction project. The proposed surface change would bring approximately 750 truck round-trips through Georgetown, if Georgetown becomes the preferred haul route. However, since much of the material for previous phases of construction was available on-site, the FHWA believes that the total number of round-trips through Georgetown will still be under the estimate of 2010 trucks, including the additional trips for the proposed surface change. Therefore the truck traffic will not be above that already analyzed in the FEIS.

The FHWA does realize that these additional trips would be perceived as an increase by Georgetown residents, since they are currently used to seeing fewer trucks. This may have short-term impacts on community character and on revenue which will be additive to what Georgetown has experienced throughout Phase I and Phase II. Impacts will be similar to those previously analyzed and disclosed in the FEIS. The FHWA will implement additional mitigation measures to reduce these impacts, as described below.

One particular concern that was voiced was regarding the size of trucks hauling through Georgetown. Smaller trucks have a more positive perception than larger trucks. There were concerns over whether 18-wheelers would be used for the materials hauling. However, the road

is not constructed to accommodate those types of vehicles and it is unlikely that any would be used for hauling.

Tumbling River Ranch

The FEIS analyzed potential impacts to the Tumbling River Ranch (the Ranch) under the Social Environment section. However, since the Traffic Analysis determined that there would not be increases in traffic volume and only slight increases in traffic speed on the sections of the road previously intended to be gravel, the proposed change in surface type should not affect the Ranch. Therefore, the remaining impacts to be discussed are impacts from hauling and/or construction.

A survey for the FEIS analyzed responses from 14 members of the Colorado Association of Dude and Guest Ranches regarding the impact of the road near their ranch on their business. Three respondents indicated that they were experiencing construction on the road near their ranch, and none reported negative experiences with the construction. Several mitigation measures were included in the ROD to address concerns near the Ranch. The FHWA has determined that some of these measures may need to be changed because they may restrict the contractor's hauling for the proposed changes to the extent that the additional cost involved would be unreasonable. The original ROD stated that there would be no materials hauling between Grant and the Geneva Campground from Memorial Day to Labor Day. All materials needed for construction of the portion of the road above the Ranch would be developed from within the corridor, and all materials needed for the portion of the road below the Ranch would be hauled in from the Grant side. However, Phases I and II have depleted much of the material reserves at the Duck Lake and Geneva Basin pits. Only minimal material suitable for roadway construction remains. In addition, the following would add to the cost of the project:

- Requiring contractors to process large volumes of material (from on-site pits) to make suitable construction materials
- Restricting the use of commercial sources for use above Station 7+000 on the Grant side of the project
- Requiring the use of on-site material sources will not allow for cost-effective completion of asphalt paving.
- Requiring the development of two aggregate sources (one on each side of Station 7+000)

Due to increases in materials costs and overall project cost increases, the FHWA needs to allow the contractor the flexibility of potentially hauling from the Grant side of the project in order to complete the project in a cost effective and timely manner. FHWA has experienced difficulty with hauling restrictions on prior phases of this project. On Phase II, FHWA received very high estimates for work under the first bidding process. Through coordination with Georgetown, the hauling restrictions were eased resulting in a savings of over \$5 million on the new estimates. Maintaining the restrictions on hauling would drive up project costs substantially, possibly to the point that construction no longer is practicable, and would at the least likely result in more years needed to complete the project due to funding constraints. The current construction schedule requires five to six construction seasons to complete. By reducing the hauling restrictions, the project can be completed in two and a half to three years, which should reduce impacts for the project overall.

Changes in mitigation regarding lifting of hauling restrictions in front of the Ranch during the summer may have additional impacts to the Ranch, such as increased noise of trucks, increased truck traffic, and interference with Ranch operations such as horse trailing. The Ranch has expressed concerns regarding the potential noise increases.

FHWA ran a noise analysis of hauling noise at the Ranch. Noise sensitive receivers that will likely be impacted by construction traffic noise include the Ranch and the associated recreational trail. The Ranch and the recreational trail are located approximately 185 feet and 40 feet from the center of the nearest travel lane, respectively. Noise levels with hauling were compared with weekend recreational traffic noise—the higher noise levels for this road.

Noise levels with and without construction traffic are forecasted to be 47 to 55 decibels at the recreational trail, well below the FHWA criteria of 66 dBA for sensitive land uses. These forecasts assume truck volumes that are very conservative, at a peak worst case condition. The day to day level of construction is actually projected to be much less than these forecasted volumes. Noise levels during the week day with a maximum amount of truck traffic would only be 1 to 2 decibels louder than weekend traffic with no construction trucks. This increase in noise is not perceptible to the human ear.

The FEIS also includes an analysis of the worst-case noise from the loudest elements of construction at the Ranch. This would include construction machinery use, engine noise, and back-up warning signals. Any noise resulting from hauling past the Ranch would be well below the noise levels experienced during construction. Therefore, noise levels would not be greater than those already analyzed in the FEIS.

The FHWA has met with the Ranch owner and as a result of some of his concerns, FHWA will construct the new horse trail earlier in construction. This mitigation may offset some of the additional impacts of hauling near the Ranch in the summer. FHWA is continuing to work with the ranch owner on stockpiling material to reduce hauling during the summer months, and to coordinate hauling to the extent possible to avoid conflicts with Ranch operations. The proposed changes in mitigation will result in no new significant temporary construction impacts or anticipated economic impacts not previously analyzed in the FEIS.

2. Project Area Construction Impacts

All construction for the proposed change in surface type will occur within the roadway prism. There will be no additional disturbance as a result of the proposed change. Construction noise will be similar to that already analyzed in the FEIS. Materials will come from those sources already analyzed or will be brought in from commercial sources.

3. Mitigation Measures

In coordination with the town of Georgetown, the FHWA will implement the following mitigation measures to reduce the impact of truck traffic:

- The FHWA will not haul through Georgetown prior to 7:00 am or after 7:00 pm. Road closures will be allowed from 8:00 am to 11:00 am and from 1:00 PM to 3:00 pm on Monday through Friday of each week, with a night shift from 9:00 pm to 6:00 am on Sunday through Thursday nights, during periods of major construction activity, as previously agreed upon.

- The contractor will be directed to use the haul route designated in the plans and in the ROD for both incoming and outgoing trips. A sign will be added to alert trucks on the outgoing trip of the proper haul route. Trucks will be instructed to observe speed limits, especially near sensitive areas (i.e. schools and playgrounds).
- Flaggers will be provided in coordination with Georgetown, as necessary.

In coordination with the Tumbling River Ranch, the FHWA will implement the following mitigation measures to reduce the impact of truck traffic:

- No construction activities will take place from Memorial Day through Labor Day from approximate Stations 6+000 to 8+000 (Three Mile Trailhead to bottom of Falls Hill). Aggregate and material hauling will occur during the above non-work period but be limited to the hours of 7:00 a.m. to 7:00 p.m. Traffic delays from Stations 1+000 to 6+000 will be limited to 30 minutes. The FHWA will coordinate with Tumbling River Ranch to try to minimize disruption to their business.
- Material sources will be available for development within the Guanella Pass Road corridor to reduce the amount of construction truck traffic. The material source locations include the FS land near Duck Lake and the Geneva Basin Ski Area parking lot.
- To the extent practical, materials that can be stockpiled in advance of construction will be hauled to staging areas between October 1 and May 1. Hauling of other construction materials including fuel, asphalt cement, culvert pipes, retaining wall material and machinery will need to be done throughout the year. The Project Engineer will notify Tumbling River Ranch on a daily basis from Memorial Day through Labor Day and a weekly basis the rest of the year about construction hauling traffic that travels through Grant. The FHWA will coordinate the hauling activities from Memorial Day through Labor Day to avoid conflict with Ranch activities to the extent practical.
- Notification concerning construction hauling traffic will be given to the Town of Georgetown, Clear Creek County, Park County and businesses and property owners along the road and haul route on a daily basis from Memorial Day through Labor Day and on a weekly basis the rest of the year. Hauling activities occurring between Memorial Day and Labor Day will be coordinated to avoid conflicts as much as possible with business activities along the road.
- The FHWA, in coordination with the FS, will reconstruct the horse trail above the Scott Gomer Creek Falls switchback and will construct a horse trail from the Whiteside Campground to the Three Mile Trail head with a bridge over Geneva Creek. These trail improvements will be completed prior to or as the first item of construction under Phase 3. The FHWA will coordinate the details of the location and design with Tumbling River Ranch.
- A Memorandum of Understanding (MOU) between Park County and the Tumbling River Ranch concerning right-of-way for construction and roadway maintenance will be completed prior to construction in the area of the Ranch.

R. CUMULATIVE IMPACTS

Table 4 lists the new reasonably foreseeable future actions in the vicinity of Guanella Pass Road not described in the 2002 FEIS.

Table 4. Reasonably Foreseeable Future Projects

Project Name	Description	Size	Status
Alvarado Road reconstruction Project	1.8 mile road reconstruction project located on the north side of Georgetown. Alvarado Road parallels I-70 and provides secondary local access avoiding I-70.	1.8 miles of roadway	Awarded in 2008
Clear Creek County Countywide Wastewater Utility Plan	Presents recommendations for regionalizing wastewater treatment services for the county.	Countywide	Plan completed in 2008
Clear Creek County Community Wildfire Protection Plan	Mitigation recommendations, implementation, monitoring, and evaluation of wildfire risk throughout the county. Includes strategic forest thinning and fuels treatment recommendations.	County-wide	CWPP completed
Guanella Pass Road Management Plan	Development of new picnic facilities	n/a	FONSI signed implementation pending
Guanella Pass Road Management Plan	Development of designated dispersed camping at Clear Lake Reservoir, south of Clear Lake campground, along Silver Dollar Lake Road	n/a	FONSI signed implementation pending
Guanella Pass Road Management Plan	Seasonal road closures for both Guanella Pass Road and Silver Dollar Lake Road	n/a	FONSI signed implementation pending
Guanella Pass Road Management Plan	Closure of all non-designated dispersed campsites throughout the corridor	n/a	FONSI signed implementation pending
Guanella Pass Road Management Plan	Reconstruction of Clear Lake and Guanella Pass campgrounds including adding sites	n/a	FONSI signed implementation pending
Guanella Pass Road Management Plan	Development of new picnic facilities	n/a	FONSI signed implementation pending
Mt Evans Wilderness permit system	Requirement of permits for all recreational activities within the wilderness boundaries	n/a	TBD

Table 4. Reasonably Foreseeable Future Projects

Project Name	Description	Size	Status
I-70 Mountain Corridor	Non-infrastructure related components (increased enforcement, bus, van, or shuttle service, TDM etc.), Advanced Guideway System along I-70, interchange improvements including one at Georgetown, truck operation improvements, some auxiliary lanes, frontage roads, and additional general purpose lanes from Floyd Hill through the Twin Tunnels.	Highway improvements could add additional 1 - 2 lanes on I-70 each direction	Programmatic FEIS is underway
US 285 - Bailey to Fairplay	Improvements and additional capacity on US 285 between Bailey and Fairplay; additional lanes, intersection improvements, access management, transit improvements, etc.	Variety of improvements could add an additional lane each direction	Construction has begun on portions of this project
Central City/Clear Creek Superfund Sites	Continued cleanup of abandoned mine sites within the 400 square mile Clear Creek watershed	multiple sites throughout the watershed	ongoing since the early 1980's

Cumulative effects from the project were evaluated in the 2002 FEIS. As described in chapter seven of this reevaluation, "Impacts of Proposed Changes", the proposed surface material change would have very limited impacts that are different from those previously described in the FEIS, and the area of direct disturbance would not change from that analyzed for the ROD selected alternative. Also, as discussed in Section VII, L, *Social Environment*, the proposed surface material change is not expected to alter the project's effect on future land use, as reported in the FEIS. Therefore, there are no indications that the proposed change to the selected alternative would contribute to new cumulative effects when considered in conjunction with the projects listed above.

S. MEASURES TO MINIMIZE HARM

Topic	FEIS Impact	Reevaluation Impact	Mitigation Measures
Social Environment	A 20 percent increase over 2025 No Action traffic volumes would occur, with anticipated impacts to community character (increased congestion, parking, and traffic flow problems) and local economy (including enhancements such as increased retail sales,	The same traffic volume increases and resulting impacts to community character, local economy, and land use would occur. The proposed surface material change would be consistent with local land use policies and plans. The surface material type may be in conflict with the CMS,	Same as ROD.

Topic	FEIS Impact	Reevaluation Impact	Mitigation Measures
	<p>employment, and expanded recreational services and activity, corresponding to traffic volume increase. Some increase in tourism and demand for services would occur, which may increase pressure for development, although this would be minimal because of a lack of privately held land.</p>	<p>which called for a combination of surface types to be used, but would be in accord with general recommendations of the CMS.</p>	
Recreation	<p>Increases in recreation uses are likely to occur. Design considerations, in coordination with FS management actions will help the FS more intensively manage recreation.</p>	<p>The same increases in recreation would occur. There are no changes in special design features.</p>	<p>Same as ROD.</p>
Visual Quality	<p>Visual impacts from alignment changes, addition of retaining walls and guardrails, and surface material changes. Improvements to visual quality from repairing unvegetated slopes and reduced dust.</p>	<p>Additional section of road (about 3.2 miles in total) changed from gravel to asphalt with chip seal overlay would be visually noticeable. No noticeable change on areas changed from macadam to asphalt with chip seal. Consistent visual appearance due to same material used throughout corridor. Reduced dust along gravel sections that would be surfaced with asphalt.</p>	<p>FHWA will not currently stripe either the centerline or the fog lines (white lines along the sides of the road) to maintain the rustic appearance. This may be revisited periodically depending on safety concerns. Park and Clear Creek Counties will make the long term decision as the maintaining agencies.</p>
Water Resources	<p>An improvement to conditions that degrade water quality would occur, such as eroding roadway ditches, shoulders, and embankments. A potential for erosion from new disturbance would occur. Improvements to water quality from reduced sediment with the addition of hardened surfacing.</p>	<p>The same improvements from correcting many of the erosion problems would occur, as well as the potential erosion from new disturbance. The increase in hardened surfacing would further improve water quality from roadway runoff issues.</p>	<p>Same as ROD.</p>

Topic	FEIS Impact	Reevaluation Impact	Mitigation Measures
Plants and Animals	Increases in traffic may impact animals and TES species via road/wildlife interactions. Disturbance may displace animals, and there may be some loss of habitat due to changes of road alignment or the creation of parking lots.	There would be no increase in traffic and only imperceptible increases in speed due to the proposed changes. Wildlife considerations incorporated into the design have a beneficial impact on wildlife.	Same as ROD.
Construction Impacts	Increases in truck traffic may result in increased noise, vibration, and traffic delays. Revenue may decrease slightly during the construction season. Several measures were introduced to reduce construction impacts on Georgetown and on the Tumbling River Ranch.	<p>There would be no increase in truck traffic through Georgetown from that analyzed in the FEIS. However, observed truck traffic will increase and is expected to be noticed by residents. Impacts will be similar to those discussed in the FEIS.</p> <p>Due to changes in mitigation, there will be increased hauling near Tumbling River Ranch in the summer months. This is expected to result in increased noise and truck traffic, and may interfere with some Ranch operations. The FHWA will work with the Ranch owner to minimize these impacts to the extent possible.</p>	<p>The FHWA will not haul through Georgetown prior to 7:00 am or after 7:00 pm. Road closures will be allowed from 8:00 am to 11:00 am and from 1:00 PM to 3:00 pm on Monday through Friday of each week, with a night shift from 9:00 pm to 6:00 am on Sunday through Thursday nights, during periods of major construction activity, as previously agreed upon.</p> <p>The contractor will be directed to use the haul route through Georgetown designated in the plans and in the ROD for both incoming and outgoing trips. A sign will be added to alert trucks on the outgoing trip of the proper haul route. Trucks will be notified of the Town's concern about excessive speed, especially near the school, and of other traffic violations.</p> <p>Flaggers will be provided in coordination with the Town of Georgetown when necessary.</p> <p>No construction activities will take place from Memorial Day through Labor Day from approximate Stations 6+000 to 8+000 (Three Mile Trailhead to bottom of Falls Hill). Aggregate and material hauling will occur during the above non-work period but be limited to the hours of 7:00 a.m. to 7:00 p.m. Traffic delays from Stations 1+000 to 6+000 will be limited to 30</p>

Topic	FEIS Impact	Reevaluation Impact	Mitigation Measures
			<p>minutes. The FHWA will coordinate with Tumbling River Ranch to try to minimize disruption to their business.</p> <p>Material sources will be available for development within the Guanella Pass Road corridor to reduce the amount of construction truck traffic. The material source locations include the FS land near Duck Lake and the Geneva Basin Ski Area parking lot.</p> <p>To the extent practical, materials that can be stockpiled in advance of construction will be hauled to staging areas between October 1 and May 1. Hauling of other construction materials including fuel, asphalt cement, culvert pipes, retaining wall material and machinery will need to be done throughout the year. The Project Engineer will notify Tumbling River Ranch on a daily basis from Memorial Day through Labor Day and a weekly basis the rest of the year about construction hauling traffic that travels through Grant. The FHWA will coordinate the hauling activities from Memorial Day through Labor Day to avoid conflict with Ranch activities to the extent practical.</p> <p>Notification concerning construction hauling traffic will be given to the Town of Georgetown, Clear Creek County, Park County and businesses and property owners along the road and haul route on a daily basis from Memorial Day through Labor Day and on a weekly basis the rest of the year. Hauling activities occurring between Memorial Day and Labor Day will be coordinated to avoid conflicts as much as possible with business</p>

Topic	FEIS Impact	Reevaluation Impact	Mitigation Measures
			<p>activities along the road. If additional hauling through Georgetown is required, the FHWA will coordinate regarding flagging and other concerns.</p> <p>The FHWA, in coordination with the FS, will reconstruct the horse trail above the Scott Gomer Creek Falls switchback and will construct a horse trail from the Whiteside Campground to the Three Mile Trail head with a bridge over Geneva Creek. These trail improvements will be completed prior to or as the first item of construction under Phase 3. The FHWA will coordinate the details of the location and design with Tumbling River Ranch.</p> <p>A Memorandum of Understanding (MOU) between Park County and the Tumbling River Ranch concerning right-of-way for construction and roadway maintenance will be completed prior to construction of Phase III.</p>

VIII. COORDINATION AND COMMENT

A. PUBLIC COORDINATION

A newsletter was provided the first week of March 2009 to everyone on the project mailing list. The newsletter explained progress that had been made on the project to date and explained the concerns with the failing surface treatments. It explained the evaluation process and asked for input on the evaluation. The newsletter provided contact information to submit comments and gave the dates and locations for the public meetings.

In March and April 2009, the FHWA held two public meetings to provide information and solicit public issues and concerns about the proposal to change the surface type in locations along Guanella Pass Road. Before the meeting, the FHWA placed public notices in the Denver Post, the Clear Creek County Currant, and the Park County Flume, and provided flyers to Ms. Cindy Neely to post in public locations in Georgetown. The first meeting took place on March 24, 2009, at the Platte Canyon Fire Department at 153 Delwood Drive, in Bailey, Colorado. The second meeting was scheduled for March 26, 2009, but had to be rescheduled because of a severe snow storm. Clear Creek County posted notices at the meeting site and notified citizens of the change in date. The rescheduled meeting was held on April 8, 2009, at the Georgetown Community Center at 613 6th Street, Georgetown, Colorado.

The meetings were conducted in an open-house format from 7:00 p.m. to 7:15 p.m. and from 8:30 p.m. to 9:00 p.m. with representatives from the FHWA available to answer questions. From 7:15 p.m. to approximately 8:30 p.m., FHWA's project manager and environmental biologist gave a formal overview presentation of the project with a question-and answer session.

The Bailey meeting was attended by eight members of the general public. Comments, questions, and concerns included:

- Guanella Pass becoming a connector route
- The quality of work performed to date
- The performance of the proposed surface type changes
- Effects to horseback riding activities
- Project cost and scheduling
- The rural character of Guanella Pass Road
- Traffic speeds and safety to public and wildlife
- Vehicle restrictions (length and weight)
- *County maintenance responsibilities*

Comments, questions, and concerns were addressed at the public meeting. Many of the issues raised are also addressed in the sections above. Italicized issues are outside of the authority of the FHWA, and these concerns were referred to the partner agencies for response.

The Georgetown meeting was attended by 15 members of the general public. Comments, questions, and concerns included:

- Guanella Pass becoming a connector route
- The quality of work performed to date (what is the reason for the failures?)
- The performance of the proposed surface type changes
- Project cost and scheduling, including cost of maintenance vs. new surface types
- The rural character of Guanella Pass Road
- Traffic speeds and safety to public and wildlife
- Vehicle restrictions (length and weight)
- Materials sources and the effects of hauling through Georgetown
- Changes to "wilderness feel" at the summit
- Wildlife crossings
- General comments in praise of the existing project and support for the proposed changes
- *County maintenance responsibilities*
- *Speed and parking enforcement issues*
- *Winter use*

Comments, questions, and concerns were addressed at the public meeting. Many of the issues raised are also addressed in the sections above. Italicized issues are outside of the authority of the FHWA, and these concerns were referred to the partner agencies for response.

B. PUBLIC COMMENT

The FHWA has received letters, E-mails, or comment sheets from 28 members of the public. Nineteen submittals are in favor of the project, although several mention concerns about

Guanella Pass becoming a connector route, and about either making sure the new surfacing does not lead to speed increases, or mention concerns about speed enforcement. Three letters requested that Alternative 6 be implemented as stated in the original ROD, citing concerns over increased traffic/recreational use and increased speeds. The Mount Evans Group of the Sierra Club also sent a letter that stated concerns that Guanella Pass Road will become a connector route, and that increased traffic and speeds would be a threat to wildlife. They requested that the road be repaired with the existing surface types. FHWA has concluded that the proposed changes in surface type will have no significant impact on traffic or speed, as determined in the referenced studies and in the preceding discussion. Speed enforcement concerns were also heard by Park and Clear Creek Counties and those entities will consider potential solutions to this issue.

Five submittals request that nothing further be done on the road, including the rest of Phase II and Phase III, citing concerns about wilderness, crowded conditions, and use of taxpayer funds for road construction on Guanella Pass. The FHWA would not be fulfilling the original purpose and need for the project discussed in the FEIS and the ROD if the FHWA were to abandon Phase III. One letter requested that the road be opened in the winter. As discussed previously, the road is not designed for winter maintenance. However, the long-term decision about winter use will be up to the Counties.

Comments received are on file with the FHWA and are available to be reviewed upon request.

Throughout the public comment process, the majority of comments focused on concerns about traffic volume and vehicle speed, impacts to wildlife, and concerns about maintaining the rural character of the road. Since the FHWA had already identified Traffic, Rural Character, and Wildlife concerns as important issues for additional analysis, the FHWA feels that it anticipated and addressed public concerns both in the reevaluation and in the public meeting presentations. The FHWA has analyzed the potential for increases in speed and increases in traffic, as well as corresponding impacts to traffic in the sections above. The above sections also include analysis of the potential for Guanella Pass to become a connector route. The Route Assessment (Jacobs 2009) addresses the reasons for the failure of the surface type and concludes that a permanent surface type is needed.

Several comments were received at the public meetings asking about the performance of the existing and changed surface types, project cost and scheduling, and maintenance costs. The majority of these comments seemed to be a request for information as opposed to concerns about the project. Two written comments did raise concerns about the construction and performance of the gravel and macadam sections and requested that the surfaces be repaired rather than replaced. The Route Assessment (Jacobs 2009) indicated that the climate and conditions was the cause of the premature failures, rather than improper application.

Additionally, a few specific concerns were addressed. Concerns about hauling through Georgetown were addressed through a phone conversation with a Georgetown representative, Ms. Cindy Neely. Concerns about the horse trail and hauling on the Grant side of the project are being addressed through meetings with Tumbling River Ranch representative Mr. Scott Dugan.

The FHWA understands that there are concerns regarding speed and parking enforcement issues, management of recreational visitors along the road, and County maintenance concerns. However, these items are outside of the jurisdiction of the FHWA. The FHWA has encouraged the FS, the Counties, and the City of Georgetown to coordinate to address these issues.

C. COORDINATION WITH PARTNER AND RESOURCE AGENCIES

During analysis of the proposed changes, the FHWA corresponded with individual agencies regarding potential impacts. The following provides a brief summary of the meetings and critical correspondence:

- **February 18, 2009**—Partner Meeting with Park and Clear Creek Counties, Town of Georgetown, and FS—Discussions of the Route Assessment Results and need for public meetings
- **March 10, 2009**—FHWA sent letters to the US Army Corps of Engineers (USACE), the SHPO, the Colorado Department of Public Health and the Environment, the CDOW, and several American Indian tribes informing them of the potential project and asking for input in the evaluation process. Tribal entities contacted include:
 - Comanche Nation of Oklahoma
 - Wind River Reservation
 - Northern Arapaho Business Council
 - Northern Cheyenne Reservation
 - Southern Ute Indian Tribe
 - Uintah & Ouray Tribal Business Committee
 - Ute Tribe of the Uintah & Ouray Reservation
 - Ute Mountain Ute Tribe
 - Colorado Chapter Ute Indian Tribe
 - White Mesa Ute Council
- **March 12, 2009**—Received response from USACE requesting information on any changes in the project that might require a change to Clean Water Act permits.
- **March 13, 2009**—Received response from SHPO requesting the FHWA make a formal determination on impacts of the proposed changes to historic resources.
- **March 19, 2009**—Partner Meeting with Park and Clear Creek Counties, Town of Georgetown, and FS—Project updates and preparation for public meetings
- **March 23, 2009**—FHWA requested concurrence from SHPO on a “no historic properties affected” determination. The National Park Service (NPS) and the Town of Georgetown were also sent letters informing them of this determination.
- **March 31, 2009**—Received letter of concurrence from SHPO on the “no historic properties affected” determination.
- **April 15, 2009**—FHWA sent a letter to USFWS stating that there were no changes to previous consultation issues as a result of the proposed changes. FHWA also included a template BA for consultation on water depletions, per several conversations between USFWS and the FHWA.
- **May 13, 2009**—Received response from FHWA concurring with FHWA’s determination of no effect to species other than water-depletion-related species.

IX. REFERENCES

- CDPHE. 2008. Status of Water Quality in Colorado—2008. The Update to the 2002, 2004, and 2006 305(b) Reports. April. Accessed on the Internet at http://www.cdphe.state.co.us/op/wqcc/Resources/waterstatus_305_b/305bUpdate08.pdf.
- CDPHE. 2008a. Colorado Department of Public Health and Environment Water Quality Control Commission, 5 CCR 1002-93, Regulation #93: Section 303(d) List Water-Quality-Limited Segments Requiring TMDLs. Effective April 30, 2008. Accessed on the Internet at <http://www.cdphe.state.co.us/regulations/wqccregs/100293wqlimitedsegmdls.pdf>.
- CDPHE. 2008b. Colorado Department of Public Health and Environment Water Quality Control Commission, 5 CCR 1002-94, Regulation #94: Colorado's Monitoring and Evaluation List. Effective April 30, 2008. Accessed on the Internet at <http://www.cdphe.state.co.us/regulations/wqccregs/100294wqccmonitoringevaluationlist.pdf>.

X. AVAILABILITY OF TECHNICAL REPORTS

Several sections of this re-evaluation are summaries of technical memorandums and reports prepared for FHWA for this document. The detailed technical reports listed below are available for agency and public review upon request from the Federal Highway Administration in Lakewood, Colorado.

- FHWA. 2002. Colorado Forest Highway 80, Guanella Pass Road Final Environmental Impact Statement.
- FHWA. 2003. Record of Decision Guanella Pass Road.
- Jacobs Engineering Group. 2009. Guanella Pass Road CO PFH 80-1(1), 1(2), 2(2), 2(3) & 2(4) Route Assessment. Prepared for Federal Highway Administration.
- Jacobs Engineering Group. 2009a. Guanella Pass Surface Evaluation: Effect to Traffic Volumes and Speeds Technical Memo. Prepared for Federal Highway Administration.
- Jacobs Engineering Group. 2009b. Guanella Pass Surface Evaluation: Effect to Future Land Use Technical Memo. Prepared for Federal Highway Administration.
- Jacobs Engineering Group. 2009c. Guanella Pass Surface Evaluation: Noise Analysis Technical Memo. Prepared for Federal Highway Administration.
- USDA Forest Service. 2009. Impacts to USFS R2 Sensitive Plants – Guanella Pass Road Improvement Project Modification for Re-surfacing (Paving) of Portion of Failed Base Material Gravel Road, Arapaho National Forest and Pike National Forest

Appendix A
Agency Coordination Letters

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U.S. Department
of Transportation
**Federal Highway
Administration**

Central Federal Lands Highway Division
March 10, 2009

12300 West Dakota Avenue
Suite 380
Lakewood, CO 80228

In reply refer to: HFPM-16

Mr. Timothy Carey
US Army Corps of Engineers
Denver Regulatory Office
9307 S. Wadsworth Blvd
Littleton, CO 80128-6901

Subject: Colorado Forest Highway 80, Guanella Pass Road

Dear Mr. Carey:

We are contacting you at this time to inform you of an evaluation being conducted by the Federal Highway Administration (FHWA), Central Federal Lands Highway Division, in cooperation with the Colorado Department of Transportation, Pike and Arapaho National Forests, Clear Creek and Park Counties, and the Town of Georgetown. The surface type on some sections of Guanella Pass Road is being re-evaluated because portions constructed thus far are deteriorating at an accelerated pace and are not performing as originally anticipated. Because the surface type was defined in the January 2003 Record of Decision, this evaluation is being done as a part of the National Environmental Policy Act (NEPA) process to determine if a new surface type would result in any new significant impacts that were not previously identified in the September 2002 Final Environmental Impact Statement (FEIS) or the January 2003 Record of Decision (ROD).

Improvements to Guanella Pass Road are currently underway in accordance with the ROD. Phase I of the project (from approximately milepost [MP] 9.3 to MP 17.0) has been constructed and Phase II construction (from approximately MP 17.0 to the Town of Georgetown) is currently underway. Segments of the route that have been surfaced with gravel and macadam are experiencing severe erosion and surface degradation, including rutting, washboarding, premature failures, and excessive surface distress. In response, the FHWA has prepared a Route Assessment to evaluate the performance and sustainability of the improvements. The Route Assessment recommended surfacing the gravel and macadam portions of the roadway with a permanent and sustainable surface. Therefore, we are evaluating the use of asphalt (with chip seal overlay) on all gravel and macadam sections. No other changes to the alternative selected in the ROD, including the roadway classification, level of rehabilitation or reconstruction, alignment, or area of disturbance, are anticipated at this time.

Please let us know if your agency has any input to this evaluation process. Public meetings related to this issue are planned for March 24 in Bailey and March 26 in Georgetown. We are attaching a recent newsletter that provides more information about the proposal and the public meetings.

MOVING THE
AMERICAN
ECONOMY



If you have any questions, please contact Nicole Winterton, Environmental Protection Specialist, at 720-963-3689 or write to the above address, Attention: Environment HFHD-16.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Mark Meng". The signature is fluid and cursive, with a large initial "M" and a long, sweeping tail.

Mark Meng, P.E.
Project Manager

Enclosure



U.S. Department
of Transportation
**Federal Highway
Administration**

Central Federal Lands Highway Division
March 9, 2009

12300 West Dakota Avenue
Suite 380
Lakewood, CO 80228

In reply refer to: HFPM-16

Mr. Larry Svoboda
1595 Wynkoop St
Denver, CO 80202-1129

Subject: Colorado Forest Highway 80, Guanella Pass Road

Dear Mr. Svoboda:

We are contacting you at this time to inform you of an evaluation being conducted by the Federal Highway Administration (FHWA), Central Federal Lands Highway Division, in cooperation with the Colorado Department of Transportation, Pike and Arapaho National Forests, Clear Creek and Park Counties, and the Town of Georgetown. The surface type on some sections of Guanella Pass Road is being re-evaluated because portions constructed thus far are deteriorating at an accelerated pace and are not performing as originally anticipated. Because the surface type was defined in the January 2003 Record of Decision, this evaluation is being done as a part of the National Environmental Policy Act (NEPA) process to determine if a new surface type would result in any new significant impacts that were not previously identified in the September 2002 Final Environmental Impact Statement (FEIS) or the January 2003 Record of Decision (ROD).

Improvements to Guanella Pass Road are currently underway in accordance with the ROD for the project that was approved in 2003. Phase I of the project (from approximately milepost [MP] 9.3 to MP 17.0) has been constructed and Phase II construction (from approximately MP 17.0 to the Town of Georgetown) is currently underway. Segments of the route that have been surfaced with gravel and macadam are experiencing severe erosion and surface degradation, including rutting, washboarding, premature failures, and excessive surface distress. In response, the FHWA has prepared a Route Assessment to evaluate the performance and sustainability of the improvements. The Route Assessment recommended surfacing the gravel and macadam portions of the roadway with a permanent and sustainable surface. Therefore, we are evaluating the use of asphalt (with chip seal overlay) on all gravel and macadam sections. No other changes to the alternative selected in the ROD, including the roadway classification, the level of rehabilitation or reconstruction, alignment, or area of disturbance, are anticipated at this time.

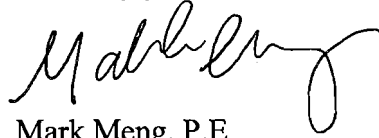
Please let us know if your agency has any input to this evaluation process. Public meetings related to this issue are planned for March 24 in Bailey and March 26 in Georgetown. We are attaching a recent newsletter that provides more information about the proposal and the public meetings.

MOVING THE
AMERICAN
ECONOMY



If you have any questions, please contact Nicole Winterton, Environmental Protection Specialist, at 720-963-3689 or write to the above address, Attention: Environment HFHD-16.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Mark Meng', written in a cursive style.

Mark Meng, P.E.
Project Manager

Enclosure



U.S. Department
of Transportation
**Federal Highway
Administration**

Central Federal Lands Highway Division
March 9, 2009

12300 West Dakota Avenue
Suite 380
Lakewood, CO 80228

In reply refer to: HFPM-16

Mr. Edward C. Nichols
State Historic Preservation Officer
Colorado Historical Society
1300 Broadway
Denver, CO 80203

Subject: Colorado Forest Highway 80, Guanella Pass Road

Dear Mr. Nichols:

We are contacting you at this time to inform you of an evaluation being conducted by the Federal Highway Administration (FHWA), Central Federal Lands Highway Division, in cooperation with the Colorado Department of Transportation, Pike and Arapaho National Forests, Clear Creek and Park Counties, and the Town of Georgetown. The surface type on some sections of Guanella Pass Road is being re-evaluated because portions constructed thus far are deteriorating at an accelerated pace and are not performing as originally anticipated. Because the surface type was defined in the January 2003 Record of Decision, this evaluation is being done as a part of the NEPA process to determine if a new surface type would result in any new significant impacts that were not previously identified in the September 2002 Final Environmental Impact Statement (FEIS) or the January 2003 Record of Decision (ROD).

The Area of Potential Effect for the project will not change, and the anticipated area of direct impact also will not change. Segments of the route where the proposed change will occur are shown in yellow and orange on the attached figure. The ROD identified an adverse effect to the Georgetown-Silver Plume National Historic Landmark District (Site 5CC3), due to visual impacts from improved switchbacks. The boundary of the Georgetown-Silver Plume National Historic Landmark District (Site 5CC3) is also shown on the attached figure. The change in surface type will not occur within this district nor will any change be made to the improved switchbacks. The stipulations defined in the December 2002 Memorandum of Agreement are being implemented.

Please let us know if your agency has any input to this evaluation process. Public meetings related to this issue are planned for March 24 in Bailey and March 26 in Georgetown. We are attaching a recent newsletter that provides more information about the proposal and the public meetings.

MOVING THE
AMERICAN
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Mark Meng, P.E.
Project Manager

Enclosure

cc: Attention: Ms. Cynthia Neely
Mr. Thomas Bennhoff
Mayor
PO Box 426
Georgetown, CO 80444

Ms. Lysa Wegman-French
National Park Service
Intermountain Support Office
National Historic Landmark Program
PO Box 25287
Denver, CO 80225-6675



U.S. Department
of Transportation
**Federal Highway
Administration**

Central Federal Lands Highway Division
March 18, 2009

12300 West Dakota Avenue
Suite 380
Lakewood, CO 80228

In reply refer to: HFPM-16

Ms. Janet George
Colorado Division of Wildlife
6060 Broadway
Denver, Colorado 80216

Subject: Colorado Forest Highway 80, Guanella Pass Road

We are contacting you at this time to inform you of an evaluation being conducted by the Federal Highway Administration (FHWA), Central Federal Lands Highway Division, in cooperation with the Colorado Department of Transportation, Pike and Arapaho National Forests, Clear Creek and Park Counties, and the Town of Georgetown. The surface type on some sections of Guanella Pass Road is being re-evaluated because portions constructed thus far are deteriorating at an accelerated pace and are not performing as originally anticipated. Because the surface type was defined in the January 2003 Record of Decision, this evaluation is being done as a part of the National Environmental Policy Act (NEPA) process to determine if a new surface type would result in any new significant impacts that were not previously identified in the September 2002 Final Environmental Impact Statement (FEIS) or the January 2003 Record of Decision (ROD).

Improvements to Guanella Pass Road are currently underway in accordance with the ROD. Phase I of the project (from approximately milepost [MP] 9.3 to MP 17.0) has been constructed and Phase II construction (from approximately MP 17.0 to the Town of Georgetown) is currently underway. Segments of the route that have been surfaced with gravel and macadam are experiencing severe erosion and surface degradation, including rutting, washboarding, premature failures, and excessive surface distress. In response, the FHWA has prepared a Route Assessment to evaluate the performance and sustainability of the improvements. The Route Assessment recommended surfacing the gravel and macadam portions of the roadway with a permanent and sustainable surface. Therefore, we are evaluating the use of asphalt (with chip seal overlay) on all gravel and macadam sections. No other changes to the alternative selected in the ROD, including the roadway classification, level of rehabilitation or reconstruction, alignment, or area of disturbance, are anticipated at this time. Coordination with your agency has been ongoing throughout design and construction in relation to wildlife crossings for amphibians and small and large mammals, and this will continue as the project progresses.

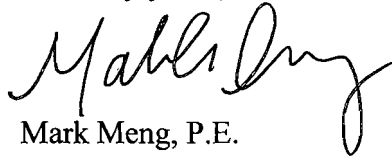
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**MOVING THE
AMERICAN
ECONOMY**



If you have any questions, please contact Nicole Winterton, Environmental Protection Specialist, at 720-963-3689, nicole.winterton@fhwa.dot.gov, or write to the above address, Attention: Environment HFHD-16.

Sincerely yours,

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Mark Meng, P.E.
Project Manager

Enclosure



U.S. Department
of Transportation
**Federal Highway
Administration**

Central Federal Lands Highway Division
March 18, 2009

12300 West Dakota Avenue
Suite 380
Lakewood, CO 80228

In reply refer to: HFPM-16

Mr. Paul Winkle
Colorado Division of Wildlife
6060 Broadway
Denver, Colorado 80216

Subject: Colorado Forest Highway 80, Guanella Pass Road

We are contacting you at this time to inform you of an evaluation being conducted by the Federal Highway Administration (FHWA), Central Federal Lands Highway Division, in cooperation with the Colorado Department of Transportation, Pike and Arapaho National Forests, Clear Creek and Park Counties, and the Town of Georgetown. The surface type on some sections of Guanella Pass Road is being re-evaluated because portions constructed thus far are deteriorating at an accelerated pace and are not performing as originally anticipated. Because the surface type was defined in the January 2003 Record of Decision, this evaluation is being done as a part of the National Environmental Policy Act (NEPA) process to determine if a new surface type would result in any new significant impacts that were not previously identified in the September 2002 Final Environmental Impact Statement (FEIS) or the January 2003 Record of Decision (ROD).

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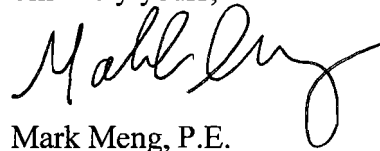
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**MOVING THE
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Sincerely yours,

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Mark Meng, P.E.
Project Manager

Enclosure



U.S. Department
of Transportation
**Federal Highway
Administration**

Central Federal Lands Highway Division
March 10, 2009

12300 West Dakota Avenue
Suite 380
Lakewood, CO 80228

In reply refer to: HFPM-16

Ms. Martha Rudolph
CO Department of Public Health and Environment
Environmental Programs
4300 Cherry Creek Drive South
Denver, Colorado 80246-1530

Subject: Colorado Forest Highway 80, Guanella Pass Road

Dear Ms. Rudolph:

We are contacting you at this time to inform you of an evaluation being conducted by the Federal Highway Administration (FHWA), Central Federal Lands Highway Division, in cooperation with the Colorado Department of Transportation, Pike and Arapaho National Forests, Clear Creek and Park Counties, and the Town of Georgetown. The surface type on some sections of Guanella Pass Road is being re-evaluated because portions constructed thus far are deteriorating at an accelerated pace and are not performing as originally anticipated. Because the surface type was defined in the January 2003 Record of Decision, this evaluation is being done as a part of the National Environmental Policy Act (NEPA) process to determine if a new surface type would result in any new significant impacts that were not previously identified in the September 2002 Final Environmental Impact Statement (FEIS) or the January 2003 Record of Decision (ROD).

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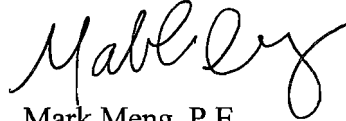
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**MOVING THE
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Sincerely yours,

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Mark Meng, P.E.
Project Manager

Enclosure



U.S. Department
of Transportation
**Federal Highway
Administration**

Central Federal Lands Highway Division
March 23, 2009

12300 West Dakota Avenue
Suite 380
Lakewood, CO 80228

In reply refer to: HFPM-16

Mr. Thomas Bennhoff
Mayor
PO Box 426
1300 Broadway
Georgetown, CO 80444

Attention: Ms. Cynthia Neely

Subject: Colorado Forest Highway 80, Guanella Pass Road Surface Reevaluation

Dear Mayor Bennhoff:

This letter constitutes a request for review and comment on a determination of effect on the Georgetown-Silver Plume National Historic Landmark District for the project referenced above. The Federal Highway Administration (FHWA), Central Federal Lands Highway Division, proposes to change one element of the alternative that was selected in the January 2003 Record of Decision for the Guanella Pass Road project. The proposed change is to surface the gravel and macadam segments of Guanella Pass Road with asphalt and a chip seal overlay. An environmental evaluation is being prepared to determine if the new surface type would result in any new significant impacts that were not previously identified in the September 2002 Final Environmental Impact Statement or the January 2003 Record of Decision.

In recent correspondence dated March 13, 2009, the State Historic Preservation Officer (SHPO) agreed that the Area of Potential Effects (APE) established for the 2002 project is appropriate for the current project and that FHWA consider evaluating the effects of the proposed undertaking on Guanella Pass Road and the Georgetown-Silver Plume National Historic Landmark District (Site 5CC3).

The proposed changes to the surface will not occur within the Georgetown-Silver Plume National Historic Landmark District (GSPNHL), nor will they occur on any segments of the road visible from the GSPNHL. Therefore, the FHWA has determined the proposed surfacing change will result in *no historic properties affected*.

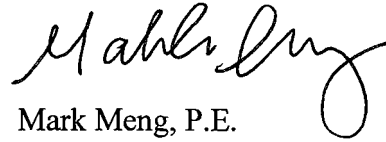
Enclosed with this letter is a figure showing the location of the proposed surface changes. Please note that segments that were previously gravel and macadam now proposed to be asphalt are shown in **yellow** and **orange** on the map. These sections begin at least 2.5 miles south of the GSPNHL boundary and will not be visible from the GSPNHL. The **red** section adjoining the GSPNHL constitutes no change from the 2003 Record of Decision.

**MOVING THE
AMERICAN
ECONOMY**



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Sincerely yours,

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Mark Meng, P.E.
Project Manager

Enclosure

cc w/o enclosure:

Mr. Edward C. Nichols
State Historic Preservation Officer
Colorado Historical Society
1300 Broadway
Denver, CO 80203

Ms. Lysa Wegman-French
National Park Service
Intermountain Support Office
National Historic Landmark Program
PO Box 25287
Denver, CO 80225-6675



U.S. Department
of Transportation
**Federal Highway
Administration**

Central Federal Lands Highway Division
March 23, 2009

12300 West Dakota Avenue
Suite 380
Lakewood, CO 80228

In reply refer to: HFPM-16

Ms. Lysa Wegman-French
National Park Service
Intermountain Support Office
National Historic Landmark Program
PO Box 25287
Denver, Colorado 80225-6675

Subject: Colorado Forest Highway 80, Guanella Pass Road Surface Reevaluation

Dear Ms. Wegman-French:

This letter constitutes a request for review and comment on a determination of *no historic properties affected* on the Georgetown-Silver Plume National Historic Landmark District for the project referenced above. The Federal Highway Administration (FHWA), Central Federal Lands Highway Division, proposes to change one element of the alternative that was selected in the January 2003 Record of Decision for the Guanella Pass Road project. The proposed change is to surface the gravel and macadam segments of Guanella Pass Road with asphalt and a chip seal overlay. An environmental evaluation is being prepared to determine if the new surface type would result in any new significant impacts that were not previously identified in the September 2002 Final Environmental Impact Statement or the January 2003 Record of Decision.

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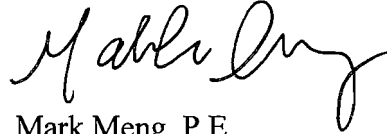
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**MOVING THE
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Mark Meng, P.E.
Project Manager

Enclosure

cc w/o enclosure:

Mr. Edward C. Nichols
State Historic Preservation Officer
Colorado Historical Society
1300 Broadway
Denver, CO 80203

Attention: Ms. Cynthia Neely
Mr. Thomas Bennhoff
Mayor
PO Box 426
Georgetown, CO 80444



U.S. Department
of Transportation
**Federal Highway
Administration**

Central Federal Lands Highway Division
March 10, 2009

12300 West Dakota Avenue
Suite 380
Lakewood, CO 80228

In reply refer to: HFPM-16

See Addressee List

Subject: Colorado Forest Highway 80, Guanella Pass Road

We are contacting you at this time to inform you of an evaluation being conducted by the Federal Highway Administration (FHWA), Central Federal Lands Highway Division, in cooperation with the Colorado Department of Transportation, Pike and Arapaho National Forests, Clear Creek and Park Counties, and the Town of Georgetown. The surface type on some sections of Guanella Pass Road is being re-evaluated because portions constructed thus far are deteriorating at an accelerated pace and are not performing as originally anticipated. Because the surface type was defined in the January 2003 Record of Decision, this evaluation is being done as a part of the National Environmental Policy Act (NEPA) process to determine if a new surface type would result in any new significant impacts that were not previously identified in the September 2002 Final Environmental Impact Statement (FEIS) or the January 2003 Record of Decision (ROD).

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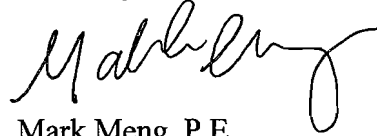
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ECONOMY



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Sincerely yours,

A handwritten signature in black ink, appearing to read 'Mark Meng', written in a cursive style.

Mark Meng, P.E.
Project Manager

Enclosure

Addressees:

Chairman Wallace Coffey
Comanche Tribal Business Committee
Comanche Nation of Oklahoma
PO Box 908
Lawton, OK 73502

Chairman Ivan Posey
Shoshone Business Council
Wind River Reservation
PO Box 538
Fort Washakie, WY 82514

Chairman Harvey Spoonhunter
Northern Arapaho Business Council
PO Box 328
Fort Washakie, WY 82514

President Leroy Spang
Northern Cheyenne Tribal Council
Northern Cheyenne Reservation
PO Box 128
Lame Deer, MT 59043

Chairman Matthew Box
Southern Ute Indian Tribe
PO Box 737
Ignacio, CO 81137

Chairman Curtis Cesspooch
Uintah & Ouray Tribal Business Committee
Uintah & Ouray Reservation
PO Box 190
Ft. Duchesne, UT 84206

Ms. Betsy Chapoose
Cultural Preservation Office
Ute Tribe of the Uintah & Ouray Reservation
PO Box 190
Ft. Duchesne, UT 84206

Chairman Ernest House, Sr.
Ute Mountain Ute Tribe
PO Box JJ
Towaoc, CO 81344

Mr. Terry Knight, Sr.
Ute Mountain Ute Tribe
PO Box 468
Towaoc, CO 81344

Mr. Luke Duncan
Colorado Chapter
Ute Indian Tribe
PO Box 190
Fort Duchesne, UT 84026

Ms. Lynn Hartman
Ute Mountain Ute Tribe
PO Box 52
Towaoc, CO 81334

Ms. Elayne Atcitty
White Mesa Ute Council
PO Box 7096
Blanding, UT 84511



U.S. Department
of Transportation
**Federal Highway
Administration**

Central Federal Lands Highway Division
April 15, 2009

12300 West Dakota Avenue
Suite 380
Lakewood, CO 80228

In reply refer to: HFPM-16

Ms. Susan C. Linner
U.S. Fish and Wildlife Service
Colorado Field Office
P.O. Box 25486, DFC (MS 65412)
Denver, Colorado 80225-0486

Subject: Colorado Forest Highway 80, Guanella Pass Road

The Federal Highway Administration (FHWA), in cooperation with the Colorado Department of Transportation, Pike and Arapaho National Forests, Clear Creek and Park counties, and the town of Georgetown, is proposing to change one element of the alternative that was selected in the January 2003 Record of Decision (ROD) for the Guanella Pass Road project. Improvements are currently underway in accordance with the ROD, with Phase I of the project (from approximately milepost [MP] 9.3 to MP 17.0) being completed in 2007 and Phase II construction (from approximately MP 17.0 to the town of Georgetown) currently underway. Segments of the route that have been surfaced with gravel and macadam are experiencing severe erosion and surface degradation, including rutting, washboarding, premature failures, and excessive surface distress. An environmental evaluation is being prepared by the FHWA to determine if the new surface type would result in any new significant impacts that were not previously identified in the September 2002 Final Environmental Impact Statement or the January 2003 Record of Decision. No other changes to the alternative selected in the ROD, including the roadway classification, level of rehabilitation or reconstruction, alignment, or area of disturbance, are anticipated at this time.

Formal consultation was completed with your office in 2002. This included a Biological Opinion issued by your office related to the Canada lynx (*Lynx canadensis*). Our analysis of the proposed change in surface treatment indicates that the change would not result in effects different in the magnitude or extent from those considered in the Biological Opinion for the following reasons:

- The road footprint will not be widened from that identified in the Biological Assessment or Biological Opinion so there would be no additional habitat loss.
- Projected future traffic volumes due to the paving of the gravel and macadam sections remain consistent with those predicted for the selected alternative in the ROD and are not expected to increase.
- The change in pavement type will only be perceptible in the gravel sections, which constitutes 3.2 miles out of a total of 23.5 miles. This is not expected to result in any increased human activity.

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- Traffic modeling indicates that traffic speeds may increase slightly in sections being changed from gravel to asphalt with chip seal (up to 5 miles per hour at most), but not at times of the day or year that correspond to lynx usage. In addition, the areas of speed increase are not located in known lynx crossing areas.
- The terms and conditions in the Biological Opinion have been or are being implemented.
- Winter closures of the road have been implemented.
- The Forest Service has taken action to control dispersed camping.

A technical report regarding this information is attached to this letter.

Since the completion of consultation for this project, changes to the USFWS list of threatened, endangered, and candidate species have occurred. The current list for Clear Creek and Park counties includes the following species:

- Canada lynx (*Lynx canadensis*), Threatened
- Greenback cutthroat trout (*Oncorhynchus clarki stomias*), Threatened
- Least tern (interior population) (*Sternula antillarum*), Endangered
- Mexican spotted owl (*Strix occidentalis lucida*), Threatened
- Pallid sturgeon (*Scaphirhynchus albus*), Endangered
- Piping plover (*Charadrius melodus*), Threatened
- Whooping crane (*Grus americana*), Endangered
- Gunnison's prairie dog (*Cynomys gunnisoni*), Candidate
- Pawnee montane skipper (*Hesperia leonardus montana*), Threatened
- Penland alpine fen mustard (*Eutrema penlandii*), Threatened
- Uncompahgre fritillary butterfly (*Boloria acrocneuma*), Endangered

All of the above species, with the exception of the Gunnison's prairie dog, were federally listed at the time of consultation and impacts from the project have been considered.

In 2008, the Gunnison's prairie dog (*Cynomys gunnisoni*) became a candidate species for official listing as threatened or endangered. There is no suitable habitat available in the project area for the Gunnison's prairie dog; therefore the FHWA determines that there will be **no effect** on this species.

In regards to water depletions, water use for Phase II and the proposed surface changes **may affect, and is likely to adversely affect** the least tern, piping plover, pallid sturgeon, and whooping crane. The FHWA anticipates that water will be available from a member of the South Platte Water Related Activities Program, Inc. (SPWRAP). A template BA is attached to this letter for Phase II and the proposed surface changes. The FHWA has not yet determined a viable water source for use on Phase III of the project. Phase III is currently scheduled for construction in 2012. The FHWA commits to complete additional consultation for water depletions on Phase III prior to construction.

If you have any questions, please contact Melissa Dickard, Environmental Biologist, at 720-963-3691, melissa.dickard@fhwa.dot.gov, or write to the above address, Attention: Environment HFHD-16.

Sincerely yours,



Mark Meng, P.E.
Project Manager

Enclosures: Lynx technical memorandum, Xcel SPWRAP certificate, Template BA for water depletions

bc w/o enclosure:

Mark Meng, HFPM-16

Nicole Winterton, HFHD-16

Melissa Dickard, HFHD-16

Central file – CO FH 80, Guanella Pass Road

Reading file

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United States Department of the Interior

FISH AND WILDLIFE SERVICE
Ecological Services
Colorado Field Office
P.O. Box 25486, DFC (65412)
Denver, Colorado 80225-0486

ES/GJ-6-CO-02-F-024 (amendment)
TAILS: 65412-2009-F-0349

MAY 13 2009

Mark Meng
Central Federal Lands Highway Division
U.S. Department of Transportation
Federal Highway Administration
12300 West Dakota Avenue, Suite 380
Lakewood, Colorado 80228

Dear Mr. Meng:

This letter constitutes an amendment to the U.S. Fish and Wildlife Service's (Service) November 26, 2002, biological opinion issued to your agency regarding reconstruction of Forest Highway 80 (Guanella Pass) in Clear Creek and Park counties between Grant and Georgetown, Colorado (ES/GJ-6-CO-02-F-024) and its effect on the threatened Canada lynx (*Lynx canadensis*).

CONSULTATION HISTORY

Phase I of the project, from approximately milepost 9.3 to 17, was completed in 2007 and Phase II, from milepost 17 to the town of Georgetown, is underway. Segments of the route that were surfaced with gravel and macadam are experiencing severe erosion and surface degradation including rutting, washboarding, premature failures, and excessive surface distress. The Federal Highway Administration (FHWA), Central Federal Lands Division is evaluating a recommendation to provide a more sustainable road surface to replace the gravel and macadam sections, and whether this change will have any significant impacts not previously evaluated to species listed as threatened and endangered under the Endangered Species Act of 1973 (ESA), as amended (16 U.S.C. 1531 *et seq.*).

Since the issuance of the biological opinion, the Gunnison's prairie dog (*Cynomys gunnisoni*) has been listed as a Candidate species. There is no habitat for the Gunnison's prairie dog in the project area. In addition, the Platte River Recovery Implementation Program (PRRIP) was established in 2006, and it addresses the adverse impacts of existing and certain new water-related activities on the Platte River target species and associated habitats. The Program also provides ESA compliance for effects to the target species as well as whooping crane (*Grus americana*) critical habitat. Consultation on the Platte River target species will occur separately.

Your amendment to the project description dated April 15, 2009, was received on April 21, 2009.

DESCRIPTION OF THE PROPOSED ACTION

Because of the failure of the macadam and gravel road surface, you are currently proposing to replace it with asphalt with large chip seal on top. The change in pavement type will occur only in the gravel sections, which constitute 3.2 miles out of a total of 23.5 miles. Traffic models indicate that the proposed change in surface type over portions of the road may result in an increase of speeds from 20 miles per hour to 25 miles per hour. No increase in human activity is expected due to the project change, nor will the road footprint be widened.

All conservation measures proposed in the original biological assessment will be implemented. In addition, the following conditions have changed since the 2002 biological opinion:

- In June 2005, the U.S. Forest Service (USFS) made a decision to close all dispersed camping on Guanella Pass.
- In the winter of 2007/2008, the USFS officially barricaded the road and also decided to close the upper parking lot with gates if the county does not close the road.
- Wall and guardrail designs were refined per recommendations at two field meetings with wildlife officials. These refinements have decreased the barrier effect of the road to lynx movement.

ENVIRONMENTAL BASELINE

There have been no changes in the Environmental Baseline since issuing the original biological opinion.

EFFECTS OF THE ACTION

In addition to the effects already described in the original biological opinion, disturbances due to a slight increase in traffic speed may occur. Traffic models indicate that the proposed change in surface type from gravel to pavement over portions of the road may result in an increase of speeds from 20 miles per hour to 25 miles per hour. The speeds on the macadam sections are not likely to change because those sections are already very curvilinear. Both the macadam and asphalt will be covered with a large chip seal. The area at the top of the pass, where speeds are modeled to increase, is an area least likely to be used by lynx as a crossing area according to USFS mapping. In addition, the modeled increase in speed will occur primarily during daylight hours and during the summer, a point in the season which experiences a maximum amount of human use at the top of the pass. This also corresponds to a period in which lynx activities typically are at a minimum.

Projected traffic volumes have not changed. Walls and guardrail have been constructed to be less of a barrier to lynx movement than was in the original biological opinion.

The road was designed to prevent snow removal due to no space for snow storage, and the USFS has committed to close the upper parking lot with a gate in the winter if the county does not close the road. The road footprint has not been widened.

CONCLUSION

After reviewing the current status of the Canada lynx, the environmental baseline for the action area, the effects of the proposed project, and the cumulative effects, the Service maintains its previous biological opinion that the action, as proposed (which includes the implementation of the conservation measures outlined in the biological opinion), is not likely to jeopardize the continued existence of the Canada lynx. Because no critical habitat is present in Colorado, we also conclude that the proposed action is not likely to destroy or adversely modify designated critical habitat for the Canada lynx.

INCIDENTAL TAKE STATEMENT

There are no modifications to the incidental take statement in our biological opinion due to the change in surface type of the Guanella Pass reconstruction. All Reasonable and Prudent Measures and Terms and Conditions from the original biological opinion still apply.

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

Sincerely,



Susan C. Linner
Colorado Field Supervisor

cc: CDOT, R1 (Janet Gerak)
FHWA (Melissa Dickard)
FWS, LK (Sandy Vana-Miller)
FWS, GJ (Kurt Broderdorp)
Michael



U.S. Department
of Transportation
**Federal Highway
Administration**

Central Federal Lands Highway Division
March 23, 2009

12300 West Dakota Avenue
Suite 380
Lakewood, CO 80228

In reply refer to: HFPM-16

Mr. Edward C. Nichols
State Historic Preservation Officer
Colorado Historical Society
1300 Broadway
Denver, CO 80203

Subject: Colorado Forest Highway 80, Guanella Pass Road Surface Reevaluation

Dear Mr. Nichols:

This letter constitutes a request for concurrence on determination of effect for the project referenced above. The Federal Highway Administration (FHWA), Central Federal Lands Highway Division, proposes to change one element of the alternative that was selected in the January 2003 Record of Decision for the Guanella Pass Road project. The proposed change is to surface the gravel and macadam segments of Guanella Pass Road with asphalt and a chip seal overlay. An environmental evaluation is being prepared to determine if the new surface type would result in any new significant impacts that were not previously identified in the September 2002 Final Environmental Impact Statement or the January 2003 Record of Decision.

In recent correspondence dated March 13, 2009, your office agreed that the Area of Potential Effects (APE) established for the 2002 project is appropriate for the current project and that FHWA consider evaluating the effects of the proposed undertaking on Guanella Pass Road and the Georgetown-Silver Plume National Historic Landmark District (Site 5CC3).

The proposed changes to the surface will not occur within the Georgetown-Silver Plume National Historic Landmark District (GSPNHL), nor will they occur on any segments of the road visible from the GSPNHL. Therefore, the FHWA has determined the proposed surfacing change will result in *no historic properties affected*.

Enclosed with this letter is a figure showing the location of the proposed surface changes. Please note that segments that were previously gravel and macadam now proposed to be asphalt are shown in **yellow** and **orange** on the map. These sections begin at least 2.5 miles south of the GSPNHL boundary and will not be visible from the GSPNHL. The **red** section adjoining the GSPNHL constitutes no change from the 2003 Record of Decision.

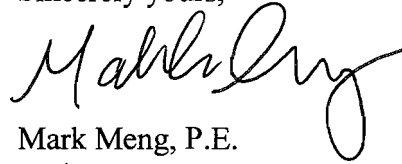
We request your comment and concurrence with our finding of *no historic properties affected*. We have also sent this documentation to the Certified Local Government (Town of Georgetown) and the National Park Service for comment.

**MOVING THE
AMERICAN
ECONOMY**



If you have any questions, please contact Nicole Winterton, Environmental Protection Specialist, at 720-963-3689 or write to the above address, Attention: Environment HFHD-16.

Sincerely yours,


A handwritten signature in black ink, appearing to read 'Mark Meng', written in a cursive style.

Mark Meng, P.E.
Project Manager

Enclosure

cc: Attention: Ms. Cynthia Neely
Mr. Thomas Bennhoff
Mayor
PO Box 426
Georgetown, CO 80444

Ms. Lysa Wegman-French
National Park Service
Intermountain Support Office
National Historic Landmark Program
PO Box 25287
Denver, CO 80225-6675

 OFFICE of ARCHAEOLOGY and HISTORIC PRESERVATION

March 31, 2009

Mark Meng
Project Manager
Federal Highway Administration
Central Federal Lands Highway Division
12300 West Dakota Avenue
Lakewood, CO 80228-2583

Re: Colorado Forest Highway 80; Guanella Pass Road. (CHS #21983)

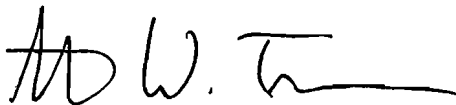
Dear Mr. Meng:


Thank you for your correspondence dated March 23, 2009 and received by our office on March 25, 2009 regarding the review of the above-mentioned project under Section 106 of the National Historic Preservation Act (Section 106). After review of the provided information, we concur with the recommended finding of *no historic properties affected* [36 CFR 800.4(d)(1)] under Section 106 for the proposed undertaking.

We request being involved in the consultation process with the local government, which as stipulated in 36 CFR 800.3 is required to be notified of the undertaking, and with other consulting parties. Additional information provided by the local government or consulting parties might cause our office to re-evaluate our eligibility and potential effect findings.

Please note that our compliance letter does not end the 30-day review period provided to other consulting parties. We look forward to the continued consultation regarding the APE. If we may be of further assistance, please contact Amy Pallante, our Section 106 Compliance Manager, at (303) 866-4678.

Sincerely,



 Edward C. Nichols
State Historic Preservation Officer



DEPARTMENT OF THE ARMY
CORPS OF ENGINEERS, OMAHA DISTRICT
DENVER REGULATORY OFFICE, 9307 S. WADSWORTH BOULEVARD
LITTLETON, COLORADO 80128-6901

March 12, 2009

Mr. Mark Meng
Project Manager
Central Federal Lands Highway Division
12300 West Dakota Avenue, Suite 380
Lakewood, Colorado 80228

**RE: Department of the Army Permit Number 199580927, Guanella Pass Road
Your Reference Number: HFPM-16**

Dear Mr. Meng:

We have received and reviewed the information on the potential surface changes that are under consideration for sections of the Guanella Pass Road. Our evaluation and subsequent issuance of a permit for this project was dependent upon impacts, directly or indirectly, that might occur to aquatic resources that are under our jurisdiction.

If the change to the road surface results in additional impacts to Waters of the US, or the required construction activity results in impacts, please notify us of the activity so that we can modify the permit to accommodate the additional work.

Thank you for keeping us informed of the potential changes in the project. If you have any questions, please contact Ms. Margaret Langworthy or me at (303) 979-4120.

Sincerely,

A handwritten signature in black ink, appearing to read "Timothy T. Carey".

Timothy T. Carey
Chief, Denver Regulatory Office

Appendix I

Threatened, Endangered, and Sensitive Species Analysis Review

List (Arp/PSICC/Both)	Common Name	Scientific Name	Status	Included in 2003 analysis?	Included in 2009 analysis?	Effect/Impact in 2003	Effect/Impact in 2009 and rationale
Federal Threatened and Endangered							
Birds							
ARP	Mexican spotted owl	<i>Strix occidentalis lucida</i>	Threatened	Yes	Yes	No effect. Does not occur in Park or Clear Creek Counties.	No effect per USFWS letter dated 5/13/09. Does not occur in Park or Clear Creek Counties.
ARP	Whooping crane*	<i>Grus Americana</i>	Endangered	Yes	Yes	No effect. Does not occur in Park or Clear Creek Counties.	Coordination with USFWS ongoing in association with the Platte River Recovery Implementation Program.
ARP	Piping plover*	<i>Charadrius melodus</i>	Threatened	Yes	Yes	No effect. Does not occur in Park or Clear Creek Counties.	Coordination with USFWS ongoing in association with the Platte River Recovery Implementation Program.
ARP	Least tern*	<i>Sterna antillarum</i>	Endangered	Yes	Yes	No effect. Does not occur in Park or Clear Creek Counties.	Coordination with USFWS ongoing in association with the Platte River Recovery Implementation Program.
Both	Yellow-billed cuckoo (candidate spp)	<i>Coccyzus americanus</i>	Candidate	Yes	Yes	No effect. Does not occur near the project area.	No effect per USFWS letter dated 5/13/09. Does not occur in Park or Clear Creek Counties.
Fish							
n/a	Greenback Cutthroat Trout	<i>Oncorhynchus clarki stomias</i>	Threatened	Yes	Yes	No effect. Greenback trout are not present in the streams adjacent to the roadway.	No effect per USFWS letter dated 5/13/09. Greenback trout are not present in the streams adjacent to the roadway.
n/a	Pallid sturgeon	<i>Scphirrhynchus albus</i>	Endangered	Yes	Yes	No effect. No water depletions will occur from project.	Coordination with USFWS ongoing in association with the Platte River Recovery Implementation Program.
n/a	Pawnee montane skipper	<i>Hesperia leonardus montana</i>	Threatened	Yes	Yes	No effect. Not known from Park or Clear Creek County. No potentially suitable habitat in project area.	No effect per USFWS letter dated 5/13/09. Not known from Park or Clear Creek County. No potentially suitable habitat in project area.
Invertebrates							
n/a	Uncompahgre fritillary butterfly	<i>Boloria acrocneema</i>	Endangered	Yes	Yes	No effect. Does not occur in Park or Clear Creek Counties.	No effect per USFWS letter dated 5/13/09. Does not occur in Park or Clear Creek Counties.
Mammals							
ARP	Canada lynx	<i>Lynx Canadensis</i>	Threatened	Yes	Yes	May effect, and likely to adversely affect.	No effect per USFWS letter dated 5/13/09.
ARP	Preble's meadow jumping mouse	<i>Zapus hudsonius preblei</i>	Threatened	Yes	Yes	No effect. Does not occur in Park or Clear Creek Counties.	No effect per USFWS letter dated 5/13/09. Does not occur in Park or Clear Creek Counties.
PSICC	Gunnison's prairie dog	<i>Cynomys gunnisoni</i>	Sensitive, Candidate (montane)	No	Yes	Not listed as a USFS sensitive species during the 2002 analysis.	No effect per USFWS letter dated 5/13/09.
Plants							
n/a	Penland alpine fen mustard	<i>Eutrema penlandii</i>	Threatened	Yes	Yes	No effect. No populations were found during field surveys.	No effect per USFWS letter dated 5/13/09.
R2 Sensitive:							

List (Arp/PSICC/Both)	Common Name	Scientific Name	Status	Included in 2003 analysis?	Included in 2009 analysis?	Effect/Impact in 2003	Effect/Impact in 2009 and rationale
Amphibians and Reptiles							
Both	Boreal toad	<i>Bufo boreas boreas</i>	Sensitive	Yes	Yes	May impact individuals but is not likely to result in a loss of viability on the Planning area, nor cause a trend toward federal listing or loss of species rangewide.	The 2009 analysis determined that all effects would be contained within the roadway prism. In coordination with the US Forest Service it has been determined there will be no impact to sensitive species.
Both	Northern leopard frog	<i>Rana pipines</i>	Sensitive	Yes	Yes	May impact individuals but is not likely to result in a loss of viability on the Planning area, nor cause a trend toward federal listing or loss of species rangewide.	The 2009 analysis determined that all effects would be contained within the roadway prism. In coordination with the US Forest Service it has been determined there will be no impact to sensitive species. The 2009 analysis determined that all effects would be contained within the roadway prism. In coordination with the US Forest Service it has been determined there will be no impact to sensitive species.
ARP	Wood frog	<i>Rana sylvatica</i>	Sensitive	Yes	Yes	No impact. Not known to occur in project area.	No impact. Not known to occur in project area.
Birds							
Both	American bittern	<i>Botaurus lentiginosus</i>	Sensitive	Yes	Yes	No impact. Does not occur near the project area.	No impact. Does not occur near the project area.
Both	Bald eagle**	<i>Haliaeetus leucocephalus</i>	Sensitive	Yes	Yes	No effect. No bald eagles are known to nest in the area of potential project impact. Bald eagles undoubtedly move through the Guanelle Pass area during seasonal migrations; however, no seasonal concentration areas are known to exist in or near the project area.	The 2009 analysis determined that all effects would be contained within the roadway prism. In coordination with the US Forest Service it has been determined there will be no impact to sensitive species.
Both	Black swift	<i>Cypseloides niger</i>	Sensitive	Yes	Yes	May impact individuals but is not likely to result in a loss of viability on the Planning area, nor cause a trend toward federal listing or loss of species within the project area.	The 2009 analysis determined that all effects would be contained within the roadway prism. In coordination with the US Forest Service it has been determined there will be no impact to sensitive species.
Both	Black tern	<i>Chlidonias niger</i>	Sensitive	Yes	Yes	No impact. Does not occur near the project area.	No impact. Does not occur near the project area.
Both	Boreal owl	<i>Aegolius funereus</i>	Sensitive	Yes	Yes	May impact individuals but is not likely to result in a loss of viability on the Planning area, nor cause a trend toward federal listing or loss of species rangewide.	The 2009 analysis determined that all effects would be contained within the roadway prism. In coordination with the US Forest Service it has been determined there will be no impact to sensitive species.
Both	Brewer's sparrow	<i>Spizella breweri</i>	Sensitive	No	Yes	Not listed as a USFS sensitive species during the 2002 analysis.	The 2009 analysis determined that all effects would be contained within the roadway prism. In coordination with the US Forest Service it has been determined there will be no impact to sensitive species.
Both	Burrowing owl	<i>Athene cunicularia</i>	Sensitive	Yes	Yes	No impact. Does not occur near the project area.	No impact. Does not occur near the project area.
ARP	Cassin's sparrow	<i>Aimophila cassinii</i>	Sensitive	No	Yes	Not listed as a USFS sensitive species during the 2002 analysis.	The 2009 analysis determined that all effects would be contained within the roadway prism. In coordination with the US Forest Service it has been

List (Arp/PSICC/Both)	Common Name	Scientific Name	Status	Included in 2003 analysis?	Included in 2009 analysis?	Effect/Impact in 2003	Effect/Impact in 2009 and rationale
							determined there will be no impact to sensitive species.
ARP	Chestnut-collared longspur	<i>Calcarius ornatus</i>	Sensitive	No	Yes	Not listed as a USFS sensitive species during the 2002 analysis.	The 2009 analysis determined that all effects would be contained within the roadway prism. In coordination with the US Forest Service it has been determined there will be no impact to sensitive species.
ARP	Ferruginous hawk	<i>Buteo regalis</i>	Sensitive	Yes	Yes	No impact. Not known to occur in the project area because of high elevation.	No impact. Not known to occur in the project area because of high elevation.
Both	Flammulated owl	<i>Otus flammeolus</i>	Sensitive	Yes	Yes	No impact. Little potential habitat with project area.	No impact. Little potential habitat with project area.
Both	Grasshopper sparrow	<i>Ammodramus savannarum</i>	Sensitive	No	Yes	Not listed as a USFS sensitive species during the 2002 analysis.	The 2009 analysis determined that all effects would be contained within the roadway prism. In coordination with the US Forest Service it has been determined there will be no impact to sensitive species.
ARP	Greater sage grouse	<i>Centrocercus urophasianus</i>	Sensitive	No	Yes	Not listed as a USFS sensitive species during the 2002 analysis.	The 2009 analysis determined that all effects would be contained within the roadway prism. In coordination with the US Forest Service it has been determined there will be no impact to sensitive species.
PSICC	Gunnison sage grouse	<i>Centrocercus urophasianus</i>	Sensitive	No	Yes	Not listed as a USFS sensitive species during the 2002 analysis.	The 2009 analysis determined that all effects would be contained within the roadway prism. In coordination with the US Forest Service it has been determined there will be no impact to sensitive species.
Both	Lewis' woodpecker	<i>Melanerpes lewis</i>	Sensitive	Yes	Yes	No impact. Does not occur near the project area.	No impact. Does not occur near the project area.
Both	Loggerhead shrike	<i>Lanius ludovicianus</i>	Sensitive	Yes	Yes	No impact. Does not occur near the project area.	No impact. Does not occur near the project area.
Both	Long-billed curlew	<i>Numenius americanus</i>	Sensitive	Yes	Yes	No impact. Does not occur near the project area.	No impact. Does not occur near the project area.
ARP	McCown's longspur	<i>Calcarius mccownii</i>	Sensitive	No	Yes	Not listed as a USFS sensitive species during the 2002 analysis.	The 2009 analysis determined that all effects would be contained within the roadway prism. In coordination with the US Forest Service it has been determined there will be no impact to sensitive species.
Both	Mountain plover	<i>Charadrius montanus</i>	Sensitive	Yes	Yes	No impact. Does not occur in Clear Creek County. Does occur further south in Park County but no potentially suitable habitat present in project area.	No impact. Does not occur in Clear Creek County. Does occur further south in Park County but no potentially suitable habitat present in project area.
Both	Northern goshawk	<i>Accipiter gentilis</i>	Sensitive	Yes	Yes	May impact individuals but is not likely to result in a loss of viability on the Planning area, nor cause a trend toward federal listing or loss of species rangewide.	The 2009 analysis determined that all effects would be contained within the roadway prism. In coordination with the US Forest Service it has been determined there will be no impact to sensitive species.
Both	Northern harrier	<i>Circus cyaneus</i>	Sensitive	No	Yes	Not listed as a USFS sensitive species during the 2002 analysis.	The 2009 analysis determined that all effects would be contained within the roadway prism. In coordination with the US Forest Service it has been determined there will be no impact to sensitive

List (Arp/PSICC/Both)	Common Name	Scientific Name	Status	Included in 2003 analysis?	Included in 2009 analysis?	Effect/Impact in 2003	Effect/Impact in 2009 and rationale
							species.
Both	Olive-sided flycatcher	<i>Contopus cooperi</i>	Sensitive	Yes	Yes	No impact because this species has little tolerance to human activity and would not normally occur (especially nest) near the existing road.	The 2009 analysis determined that all effects would be contained within the roadway prism. In coordination with the US Forest Service it has been determined there will be no impact to sensitive species.
Both	Peregrine falcon	<i>Falco peregrinus anatum</i>	Sensitive	No	Yes	Not listed as a USFS sensitive species during the 2002 analysis.	The 2009 analysis determined that all effects would be contained within the roadway prism. In coordination with the US Forest Service it has been determined there will be no impact to sensitive species.
Both	Purple martin	<i>Progne subis</i>	Sensitive	Yes	Yes	No impact. Does not occur near the project area.	No impact. Does not occur near the project area.
PSICC	Sage sparrow	<i>Amphispiza bellii</i>	Sensitive	No	Yes	Not listed as a USFS sensitive species during the 2002 analysis.	The 2009 analysis determined that all effects would be contained within the roadway prism. In coordination with the US Forest Service it has been determined there will be no impact to sensitive species.
Both	Three-toed woodpecker	<i>Picoides tridactylus</i>	Sensitive	Yes	Yes	No impact because this species has little tolerance to human activity and would not normally occur (especially nest) near the existing road.	The 2009 analysis determined that all effects would be contained within the roadway prism. In coordination with the US Forest Service it has been determined there will be no impact to sensitive species.
Both	White tailed ptarmigan	<i>Lagopus leucarus</i>	Sensitive	Yes	Yes	Analyzed as a management indicator species.	The 2009 analysis determined that all effects would be contained within the roadway prism. In coordination with the US Forest Service it has been determined there will be no impact to sensitive species.
Mammals							
PSICC	American hog-nosed skunk	<i>Conepatus leuconotus</i>	Sensitive	No	Yes	Not listed as a USFS sensitive species during the 2002 analysis.	The 2009 analysis determined that all effects would be contained within the roadway prism. In coordination with the US Forest Service it has been determined there will be no impact to sensitive species.
Both	American marten	<i>Martes Americana</i>	Sensitive	Yes	Yes	May impact individuals but is not likely to result in a loss of viability on the Planning area, nor cause a trend toward federal listing or loss of species rangewide because of the extensive amount of available habitat and the unlikelihood of den sites adjacent to the road.	The 2009 analysis determined that all effects would be contained within the roadway prism. In coordination with the US Forest Service it has been determined there will be no impact to sensitive species.
ARP	Black -tailed prairie dog	<i>Mustela nigripes</i>	Sensitive	Yes	Yes	No impact. Does not occur near the project area.	No impact. Does not occur near the project area.
Both	Fringed myotis	<i>Myotis thysanodes</i>	Sensitive	Yes	Yes	No impact. Does not occur near the project area.	No impact. Does not occur near the project area.
PSICC	Gunnison's prairie dog	<i>Cynomys gunnisoni</i>	Sensitive, Candidate (montane)	No	Yes	Not listed as a USFS sensitive species during the 2002 analysis.	The 2009 analysis determined that all effects would be contained within the roadway prism. In coordination with the US Forest Service it has been

List (Arp/PSICC/Both)	Common Name	Scientific Name	Status	Included in 2003 analysis?	Included in 2009 analysis?	Effect/Impact in 2003	Effect/Impact in 2009 and rationale
							determined there will be no impact to sensitive species.
Both	North American wolverine	<i>Gulo gulo</i>	Sensitive	Yes	Yes	No impact. Wolverines occupy large home ranges in a variety of habitats, generally remote from human development, and positive sightings have not been made in Colorado since the early 1900s. The "possible sightings" made in 1994 were not within the project area.	The 2009 analysis determined that all effects would be contained within the roadway prism. In coordination with the US Forest Service it has been determined there will be no impact to sensitive species.
ARP	Pygmy shrew	<i>Sorex hoyi</i>	Sensitive	Yes	Yes	May impact individuals but is not likely to result in a loss of viability on the Planning area, nor cause a trend toward federal listing or loss of species rangewide because of the abundance of habitat in the vicinity.	The 2009 analysis determined that all effects would be contained within the roadway prism. In coordination with the US Forest Service it has been determined there will be no impact to sensitive species.
Both	River otter	<i>Lontra Canadensis</i>	Sensitive	No	Yes	Not listed as a USFS sensitive species during the 2002 analysis.	The 2009 analysis determined that all effects would be contained within the roadway prism. In coordination with the US Forest Service it has been determined there will be no impact to sensitive species.
Both	Rocky Mountain bighorn sheep***	<i>Ovis canadensis canadensis</i>	Sensitive	Yes	Yes	Under all build alternatives increased traffic and speeds may alter current patterns of bighorn sheep range use. Sheep, which are currently drawn to magnesium chloride deposits which accumulate as a result of dust control efforts on the road, will continue to visit the road corridor and will be subjected to increased mortality (road kill) as a result of increased traffic volume and speeds. Impacts to bighorn sheep that occupy spring lambing home ranges in the vicinity of the Arrowhead Mountain-Threemile Gulch area may occur as a result of increased traffic. Bighorn use of a historic lambing area west of the road may be restricted or discontinued as a result of increased vehicle speeds and traffic volume. Sheep that utilize areas adjacent to the road may also be subjected to increased harassment by humans who leave their vehicles in an attempt for close-up photographs, and dogs off leash. Sheep that utilize the road in the vicinity of Duck Creek and the west-facing slopes above Lower Cabin Creek Reservoir, will be subjected to increased mortality and harassment by humans and dogs off leash. These impacts can be expected to result in adverse bioenergetic effects and small changes in local bighorn distribution over time. Recent population estimates suggest that the bighorn population in the Guanella Pass area is	The 2009 analysis determined that all effects would be contained within the roadway prism. In coordination with the US Forest Service it has been determined there will be no impact to sensitive species. The proposed roadway surface type will not require dust control, thereby potentially reducing the likelihood of vehicle-related mortality.

List (Arp/PSICC/Both)	Common Name	Scientific Name	Status	Included in 2003 analysis?	Included in 2009 analysis?	Effect/Impact in 2003	Effect/Impact in 2009 and rationale
						increasing and expanding its range. This information suggests that the project will not cause noticeable changes to the Mount Evans-Grant herd population or distribution.	
ARP	Swift fox	<i>Vulpes velox</i>	Sensitive	Yes	Yes	No impact. Does not occur near the project area.	No impact. Does not occur near the project area.
Both	Townsend's big-eared bat	<i>Corynorhinus townsendii</i>	Sensitive	Yes	Yes	May impact individuals but is not likely to result in a loss of viability on the Planning area, nor cause a trend toward federal listing or loss of species rangewide because no suitable roosting sites for the species were found within the project area.	The 2009 analysis determined that all effects would be contained within the roadway prism. In coordination with the US Forest Service it has been determined there will be no impact to sensitive species.
ARP	White-tailed prairie dog	<i>Cynomys leucurus</i>	Sensitive	No	Yes	Not listed as a USFS sensitive species during the 2002 analysis.	The 2009 analysis determined that all effects would be contained within the roadway prism. In coordination with the US Forest Service it has been determined there will be no impact to sensitive species.
Insects							
Both	Hudsonian emerald	<i>Somatochlora hudsonica</i>	Sensitive	No	Yes	Not listed as a USFS sensitive species during the 2002 analysis.	The 2009 analysis determined that all effects would be contained within the roadway prism. In coordination with the US Forest Service it has been determined there will be no impact to sensitive species.
PSICC	Susan's purse making caddisfly	<i>Somatochlora hudsonica</i>	Sensitive	No	Yes	Not listed as a USFS sensitive species during the 2002 analysis.	The 2009 analysis determined that all effects would be contained within the roadway prism. In coordination with the US Forest Service it has been determined there will be no impact to sensitive species.
Molluscs							
Both	Rocky Mountain capshell	<i>Acroloxus coloradensis</i>	Sensitive	Yes	Yes	No adverse effects. Potentially benefits should occur to aquatic life in general due to improved water quality conditions.	The 2009 analysis determined that all effects would be contained within the roadway prism. In coordination with the US Forest Service it has been determined there will be no impact to sensitive species.
MIS (Management Indicator Species):							
Arapahoe and Roosevelt National Forest							

List (Arp/PSICC/Both)	Common Name	Scientific Name	Status	Included in 2003 analysis?	Included in 2009 analysis?	Effect/Impact in 2003	Effect/Impact in 2009 and rationale
ARP	Elk***	<i>Cervus canadensis</i>	MIS	Yes	Yes	<p>Elk occupy seasonal ranges throughout the area of consideration. One road crossing area has been identified in Geneva Park by CODW; however elk can be expected to cross the road at essentially any point during late spring through fall. During winter, elk use is most concentrated south of Geneva Park and crossing would be most likely to occur in this area.</p> <p>Based on the presence and current levels of use of the existing road, the overall seasonal distribution and movements of elk within the area of consideration are not expected to be substantially altered by any of the build alternatives. None of the build alternatives are expected to affect the trend of increasing population.</p>	The 2009 analysis determined that all effects would be contained within the roadway prism. In coordination with the US Forest Service it has been determined there will be no impact to sensitive species.
ARP	Mule deer***	<i>Odocoileus hemionus</i>	MIS-	Yes	Yes	<p>Mule deer utilize habitat throughout the road corridor during spring, summer and fall and can be expected to cross the road at essentially any point along the road corridor during this period. During winter, mule deer occupy winter range in Geneva Creek canyon between Grant and Geneva Park.</p> <p>Based on the presence and current levels of use of the existing road, the overall seasonal distribution and movements of deer within the area of consideration are not expected to be substantially altered by any of the build alternatives. None of the build alternatives are expected to affect the trend of increasing population.</p>	The 2009 analysis determined that all effects would be contained within the roadway prism. In coordination with the US Forest Service it has been determined there will be no impact to sensitive species.
ARP	Rocky Mountain bighorn sheep***	<i>Ovis canadensis</i>	MIS	Yes	Yes	<p>Under all build alternatives increased traffic and speeds may alter current patterns of bighorn sheep range use. Sheep, which are currently drawn to magnesium chloride deposits which accumulate as a result of dust control efforts on the road, will continue to visit the road corridor and will be subjected to increased mortality (road kill) as a result of increased traffic volume and speeds. Impacts to bighorn sheep that occupy spring</p>	The proposed roadway surface type will not require dust control, thereby potentially reducing the likelihood of vehicle-related mortality.

List (Arp/PSICC/Both)	Common Name	Scientific Name	Status	Included in 2003 analysis?	Included in 2009 analysis?	Effect/Impact in 2003	Effect/Impact in 2009 and rationale
						lambing home ranges in the vicinity of the Arrowhead Mountain-Threemile Gulch area may occur as a result of increased traffic. Bighorn use of a historic lambing area west of the road may be restricted or discontinued as a result of increased vehicle speeds and traffic volume. Sheep that utilize areas adjacent to the road may also be subjected to increased harassment by humans who leave their vehicles in an attempt for close-up photographs, and dogs off leash. Sheep that utilize the road in the vicinity of Duck Creek and the west-facing slopes above Lower Cabin Creek Reservoir, will be subjected to increased mortality and harassment by humans and dogs off leash. These impacts can be expected to result in adverse bioenergetic effects and small changes in local bighorn distribution over time. Recent population estimates suggest that the bighorn population in the Guanella Pass area is increasing and expanding its range. This information suggests that the project will not cause noticeable changes to the Mount Evans-Grant herd population or distribution.	
ARP	Hairy woodpecker	<i>Picoides villosus</i>	MIS	No	No	Not selected as a MIS during the 2002 analysis.	Not selected as a MIS during the 2009 analysis.
ARP	Pygmy nuthatch	<i>Sitta pygmaea</i>	MIS	Yes	Yes	May impact individuals but because effects are minor compared to the available habitat, is not likely result in a loss of viability on the Planning are, nor cause a trend toward federal listing or loss of species rangewide.	The 2009 analysis determined that all effects would be contained within the roadway prism. In coordination with the US Forest Service it has been determined there will be no impact to sensitive species.
ARP	Golden-crowned kinglet	<i>Regulus satrapa</i>	MIS	Yes	Yes	May impact individuals but is not likely to result in a loss of viability on the Planning are, nor cause a trend toward federal listing or loss of species rangewide because the species is generally considered an interior forest species, and interior forest is, for the most part, not affected.	The 2009 analysis determined that all effects would be contained within the roadway prism. In coordination with the US Forest Service it has been determined there will be no impact to sensitive species.
ARP	Mountain bluebird	<i>Sialia currucoides</i>	MIS	No	No	Not listed as a USFS sensitive species during the 2002 analysis.	Not selected as a MIS during the 2009 analysis.

List (Arp/PSICC/Both)	Common Name	Scientific Name	Status	Included in 2003 analysis?	Included in 2009 analysis?	Effect/Impact in 2003	Effect/Impact in 2009 and rationale	
ARP	Warbling vireo***	<i>Vireo gilvus</i>	MIS	Yes	Yes	Potential adverse project affects include habitat removal during road construction and increased direct mortality due to increased traffic and speeds above those expected un the No Action Alternative. Effects due to direct mortality are expected to be negligible. Alternative 6 would impact 10.3 acres of habitat. Effects are expected to be minor because there is abundant habitat for this species in the area.	The 2009 analysis determined that all effects would be contained within the roadway prism. In coordination with the US Forest Service it has been determined there will be no impact to sensitive species.	
ARP	Wilson's warbler***	<i>Wilsonia pusilla pileolata</i>	MIS	Yes	Yes	All build alternatives will increase the potential for direct mortality of this species above levels expected under the Na-Action Alternative. Effects due to direct mortality are expected to be negligible with no discernible differences between alternatives/ The amount of habitat removal will have no discernible effect on the species.	The 2009 analysis determined that all effects would be contained within the roadway prism. In coordination with the US Forest Service it has been determined there will be no impact to sensitive species.	
ARP	Boreal toad	<i>Bufo boreas boreas</i>	MIS/Sensitive	Yes	Yes	May impact individuals but is not likely to result in a loss of viability on the Planning are, nor cause a trend toward federal listing or loss of species rangewide.	The 2009 analysis determined that all effects would be contained within the roadway prism. In coordination with the US Forest Service it has been determined there will be no impact to sensitive species.	
Pawnee National Grassland								
ARP	Black-tailed prairie dog	<i>Mustela nigripes</i>	These MIS species are for the Pawnee National Grassland and therefore unaffected by the project.					
ARP	Mule deer	<i>Odocoileus hemionus</i>						
ARP	Ferruginous hawk	<i>Buteo regalis</i>						
ARP	Burrowing owl	<i>Athene cunicularia</i>						
ARP	Mountain plover	<i>Charadrius montanus</i>						
ARP	Lark bunting	<i>Calamospiza melanocorys</i>						
*downstream species								
**examined as a federally listed T&E species in 2002								
*** examined as an MIS within the July 2002 Biological Report								