

# **Colorado State Historic Highways Inventory**

## **National Register of Historic Places Significance Evaluations**

**Volume 1 of 2: Table of Contents through  
Appendix C, State Highway 94**

Prepared for

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## Executive Summary

The *Colorado State Historic Highways Inventory* (Highways Inventory) was initiated by the Colorado Department of Transportation (CDOT) to evaluate the significance of State Highways under its jurisdiction. The Highways Inventory was completed by Mead & Hunt, Inc. and Dill Historians LLC (project team) with review from CDOT and the Colorado State Historic Preservation Office (SHPO). The Highways Inventory includes two components: an update to the historic context for the *Colorado State Roads and Highways Multiple Property Submission* (2002) (MPS), and historic summaries and statements of significance for the state's highways. The goal of the Highways Inventory is to streamline CDOT's compliance with state statutes and federal regulations.

The Highways Inventory builds upon *Highways to the Sky: A Context and History of Colorado's Highway System* (*Highways to the Sky*), prepared for CDOT in 2002, and the associated MPS prepared by the Office of Archaeology and Historic Preservation (OAHP). The MPS summarizes and supplements *Highways to the Sky* in a Multiple Property Documentation Form that includes a historic context, associated property types, and registration requirements. The MPS serves as the basis in which to evaluate State Highways for eligibility for listing in the National Register of Historic Places (National Register).

This report provides the summary of work completed during the Highways Inventory as follows:

- Section 1 provides a discussion of the purpose and the applicable federal regulations and state statutes in which this work is meant to streamline.
- Sections 2 and 3 provide details on the methodology and application of the National Register Criteria for Evaluation and MPS registration requirements.
- Section 4 provides the evaluation results and guidance on subsequent steps to assess integrity.
- Appendices include:
  - The update to the MPS historic context;
  - Individual inventory forms for each State Highway; and
  - A tabular summary of State Highways that are significant and not significant for the National Register.

The Highways Inventory evaluated 151 State Highways for significance following the MPS and recommended that 77 possess significance and 74 do not possess significance.<sup>1</sup> CDOT and the SHPO reviewed and concurred with the recommendations. State Highways that possess significance require an assessment of integrity to determine if they retain integrity and are eligible for listing in the National Register. State Highways that do not possess significance do not require further work and are not eligible for the listing in the National Register.

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<sup>1</sup> State Highways co-signed with an Interstate Highway fall under the Interstate Exemption adopted by the Advisory Council on Historic Preservation in 2005 and are exempt from Section 106 review and are not included in this project.

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## **1. Project Purpose**

When completing projects that are state or federally funded, CDOT must comply with federal historic preservation and environmental regulations and applicable state statutes described below. Compliance requires CDOT to initiate and follow a process to identify properties with historic importance. As part of the identification process, CDOT must consult with the SHPO and apply the National Register Criteria for Evaluation to determine National Register eligibility for properties that may be affected by an undertaking. The Highways Inventory streamlines this process by completing National Register significance evaluations for State Highways under the jurisdiction of CDOT in advance of completing individual projects.

### **A. Compliance with federal and state regulations**

CDOT undertakings that are federally funded are subject to review under Section 106 of the National Historic Preservation Act of 1966 (Section 106). Section 106 is a procedural law that requires federal agencies take into account the effects of their undertakings on historic properties. Historic properties are defined as any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register. This project evaluated State Highways only, not other road types or individual associated properties in the MPS or other individual road-related resources located along State Highways.

The Section 106 process involves consultation with the SHPO and other interested consulting parties, identification of historic properties, evaluation of effects, and resolution of adverse effects through mitigation. In general, properties that are 50 years or older are evaluated for significance using the National Park Service's (NPS's) National Register Criteria for Evaluation. Section 3 provides a description of the property types addressed by this project and the application of the National Register Criteria for Evaluation.

Section 4(f) of the U.S. Department of Transportation Act of 1966 stipulates that the Federal Highway Administration (FHWA) cannot approve the "use" of land from publicly owned parks, recreational areas, wildlife and waterfowl refuges, or public and private historic sites unless there is no feasible and prudent alternative to the use of the land and the action includes all possible planning to minimize harm to the property. Section 4(f) is a substantive law that requires an evaluation of alternatives that avoid the "use" of historic properties. All federally-funded transportation projects are evaluated under Section 106 and Section 4(f).

CDOT also reviews state-funded projects under the Colorado Historic Register Act (Colorado Revised Statute 24-80.1). This process is similar to Section 106 but does not require consultation with the Advisory Council on Historic Preservation (ACHP) or the preparation of an agreement document to outline mitigation when there are adverse effects.

### **B. Streamlining National Register evaluation of significance**

CDOT undertakings include federally-funded highway improvement projects. Colorado's highways must be continually maintained and in some cases modified to meet the state's transportation needs. Most of the state's highways are over 50 years old and therefore require evaluation for National Register

eligibility. State Highways that are eligible for or listed in the National Register are considered historic properties under Section 106 review.

In 2002 CDOT completed *Highways to the Sky*, which included a historic context for highway development in Colorado, guidance for evaluating State Highways, and historic summaries and site forms for 10 State Highways. This effort served as the basis for the development of the MPS by the OAH in 2003. The MPS includes a historic context, associated property types, and registration requirements for evaluating the National Register eligibility of State Highways. The MPS categorizes State Highways into one or more categories—engineered, aesthetic, and cultural routes—with associated property types and subtypes.

Because there is not typically sufficient time to research and field survey entire highways to identify significance and assess integrity for individual projects, highways are often treated as significant and the segment in the project area is assessed for integrity, which requires additional time to consult with the SHPO and consulting parties, and often results in the additional steps involved in the Section 4(f) process that lengthen the project delivery process. CDOT has also identified some State Highways for devolution, which involves transferring a highway out of state ownership. Under Section 106 and the Colorado State Register Act, transferring a historic property out of federal or state ownership can constitute an adverse effect, which requires additional steps under both the federal and state preservation laws and may include mitigation.

The Highways Inventory used the MPS to evaluate the significance of State Highways under the jurisdiction of CDOT to streamline the review process by identifying State Highways that possess significance in advance of individual projects.

National Register eligibility is based on significance and integrity. If a historic property lacks significance, then its integrity does not need to be evaluated and it is not eligible for listing in the National Register. As a result of the Highways Inventory, CDOT and the SHPO have agreed upon which highways possess significance and require additional consultation and which highways lack significance, are not eligible for listing in the National Register, and do not require further consultation.

The Highways Inventory reduces the amount of time needed for compliance with Section 106, the Colorado Historic Register Act, and Section 4(f). When CDOT proposes a highway reconstruction or repair project for a State Highway included in the Highways Inventory, CDOT and consultants can review the inventory form and determine whether it possesses significance. If the affected highway has significance, the next step is to conduct an integrity assessment for the segment of the highway within the area of potential effects (APE) to determine if it is eligible for listing in the National Register.

State Highways co-signed with an Interstate Highway fall under the Interstate Exemption adopted by the ACHP in 2005 and are exempt from Section 106 review and are not included in the Highways Inventory. Bridges located along State Highways are treated separately by CDOT and are not addressed in the Highways Inventory.

## **2. Research Design and Methodology**

The project team used primary and secondary research materials to prepare historic summaries to evaluate and prepare statements of significance for 151 State Highways following the MPS registration requirements and the National Register Criteria for Evaluation. Research consisted of existing contexts along with annual reports, mapping, and agency records to understand the history, development, and connections State Highways were constructed to provide, or subsequently provided, to identify if they were associated with one or more important historic themes.

The objectives of research were to gather and review similar resources for each highway, discuss and identify important historic themes, and provide a standard format for the evaluation results for each highway. The process below outlines the approach used to determine the classification of highways as an engineered, aesthetic, and/or cultural route and if it is associated with one or more important historic themes.

### **A. Identification of State Highways**

CDOT provided the list of State Highways for evaluation. State Highways co-signed with Interstate Highways, which are exempt from Section 106 review (see Section 1), were removed and not evaluated. State Highways were divided into five groups: a pilot group of nine State Highways identified in Chapter 11 of *Highways to the Sky* and four groups of State Highways selected based on similar geographic areas in the state and/or length. Draft evaluations for each group were reviewed and commented on by CDOT and the SHPO. The project team addressed comments and CDOT and the SHPO concurred on significance recommendations.

### **B. Review of existing survey data and development of database and inventory form**

The project team worked with the OAHP Information Management section to obtain Colorado Cultural Resource Survey Forms (survey forms) from the OAHP's Colorado Cultural Resource On-line Database (Compass) for previously identified highway segments and historic districts in close proximity to each State Highway. Relevant assessment data from previous survey forms was summarized on the inventory forms and considered in the evaluation. Assessments completed after 2002 were generally considered to be more accurate than older assessments based on guidance from CDOT and SHPO.

The project team developed a database to store locational information provided by CDOT, previous assessment data provided by the OAHP, and the historic summaries and statements of significance completed by the project team. The database generated the inventory forms for each of the State Highways evaluated. Inventory forms include the following main sections:

- Name and location of State Highway – highway name, CDOT route numbers, counties through which the highways passes, and length. This information was provided by CDOT.
- Discussion of site forms – provides a summary of available survey forms for previously surveyed highway segments for each State Highway and adjacent historic districts.

- Historical data – provides an overview of the region(s) through which the highway passes and a brief historic summary, including its physical development, related historic themes, and the nature of the connection the highway historically provided based on research completed for the project.
- Property type and areas of significance – for State Highways that possess significance, this section provides the associated property type(s) and subtype(s), area(s) and level(s) of significance, and period of construction related to its significance as defined in the MPS.
- Significance statement – provides the analysis and justification for the recommendations under *Criteria A, B, C and D* of the National Register.
- Location map – illustrates the location of the highway within the state

### **C. Research and completion of historic data for each highway**

The project team consulted similar resources for each highway to gather contextual information in the local areas and region in which each State Highway passes. Sources consulted for each highway included:

- The MPS
- *Highways to the Sky*
- *Colorado Highways Magazine*
- Historic State Highway maps
- Matthew Salek's *The Highways of Colorado*
- Previous site forms from the OAHP's Compass database
- CDOT's Online Transportation Information System (OTIS) right-of-way plans and construction records
- Secondary sources, including relevant state, regional, and local histories and online histories

These sources were used to provide a brief historic summary that discusses the highway's construction and physical development, related historic themes, the nature of the connection the highway historically provided, any distinctive features related to its design and construction, and the role of any important individuals who may have been involved in its construction. The entire length of the State Highway as it existed historically and evolved was considered and compared to the extent of the current State Highway while conducting research. State Highways were frequently realigned, renumbered, and designated from local roads developed by local agencies, or subsequently subsumed by local agencies over time. In

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some cases, research suggested that portions of existing State Highways were part of an earlier State Highway or local road. In these cases, relevant information is provided in the inventory form for the highway.

Research conducted on each highway was synthesized by the project team and provided on the inventory form, and the bibliography at the end of this report provides the major sources consulted. The process and criteria that are applied to evaluate the National Register significance of the 151 State Highways are discussed in the next section.

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### 3. Evaluation of Historical Significance

This section provides a brief overview of the process and criteria that are applied to evaluate the National Register significance of the 151 State Highways. The process is based on the guidance of the registration requirements set forth in the MPS and complies with the *Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation*, including the *Standards and Guidelines for Evaluation* (1983, as amended). In addition to the MPS, the National Register Bulletin series provides guidance on evaluating and documenting the eligibility of historic properties. Two key bulletins are:

- *National Register Bulletin: How to Apply the National Register Criteria for Evaluation*
- *National Register Bulletin: How to Complete the National Register Registration Form*

#### A. National Register Criteria for Evaluation

A general requirement of the National Register provides for a property to be at least 50 years in age before its potential for significance is evaluated. Properties less than 50 years of age must be exceptionally important to be considered historically significant. As explained in the bulletins, the National Register employs four criteria for evaluation: A, B, C, and D. *Criteria A* and *B* involve associative value, *Criterion C* involves design or construction value, and *Criterion D* involves information value; these four criteria are described in more detail below.

***Criterion A: Events – Properties that are associated with events that have made a significant contribution to the broad patterns of our history***

*Criterion A* applies to properties that have an important association with single events, a pattern of events, repeated activities, or historic trends that are significant within the context of Colorado and transportation history. Most State Highways that possess significance derive importance under *Criterion A* for a direct association with one or more important themes.

***Criterion B: Persons – Properties that are associated with the lives of persons significant in our past***

*Criterion B* applies to properties that illustrate the important achievements of a person who was significant in Colorado's past. However, it should be noted that bridge engineers, designers, and artisans are often represented by their works, which may be eligible under *Criterion C*. As a result, *Criterion B* rarely applies to State Highways as noted in the MPS. No State Highways in the subject population were found to meet National Register *Criterion B*.

***Criterion C: Design/Construction – Properties that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction***

*Criterion C* applies to properties that have distinctive design or construction characteristics that demonstrate the following: (1) the pattern of features common to a particular class of resources, (2) the individuality or variation of features that occurs within the class, (3) the evolution of that class of resources, and/or (4) the transition between classes of resources. Most State Highways that possess

significance under *Criterion C* derive importance as: representative examples of early highway design; bold engineering solutions to address the challenges associated with constructing highways, particularly to traverse mountainous terrain; or for exhibiting distinctive aesthetic design features.

***Criterion D: Information Potential – Properties that have yielded, or may be likely to yield, information important in prehistory or history***

For a property to possess significance for information potential, the information yielded by the property must answer specific important research questions that cannot be otherwise answered. The technology of highway construction is well understood and documented. As such, State Highways are unlikely to yield important information that cannot be discerned from archived plans and other records. Therefore, no State Highways evaluated in this study possess significance under *Criterion D*. However, it is possible that roads with different historic associations (e.g., toll roads, mining roads, wagon roads) could be evaluated under *Criterion D*.

The MPS provides the basis in which to apply the National Register Criteria for Evaluation to identify and evaluate the significance under these criteria for State Highways in Colorado and are discussed below.

**B. MPS Registration Requirements**

The MPS provides broad historic contexts related to the development of State Highways in Colorado and defines the associated property types. The associated property types (Section F of the MPS) includes registration requirements for three main property types and associated subtypes, along with the associated National Register Criteria requirements, potential areas of significance, and four principal periods of highway construction. A list of the property types and subtypes and related National Register criteria, potential areas of significance, and the construction periods adapted from the MPS and provided on inventory forms are listed in Table 1.

**Table 1. Property types, National Register Criteria, areas of significance, and construction periods adapted from the MPS**

<p><b>1. Cultural State Roads and Highways</b></p> <p><i>Criterion A</i> specific requirements</p> <ul style="list-style-type: none"> <li>- Early and/or prominent project of the Colorado Highway Department (associated area of significance: Transportation)</li> <li>- Association with a significant event (associated area of significance: one or more may apply, see National Register Bulletin <i>How to Complete the National Register Registration Form</i>)</li> <li>- Association with federal work-relief programs (associated area of significance: Politics/Government)</li> </ul> <p><i>Criterion C</i> specific requirements</p> <ul style="list-style-type: none"> <li>- Representative example (associated area of significance: Transportation)</li> </ul>
<p><b>2. Engineered State Roads and Highways</b></p> <p>Subtypes</p> <ul style="list-style-type: none"> <li>- Farm-to-Market Road</li> <li>- Limited access, multiple-lane, divided highway/freeway</li> <li>- Highway bypass</li> </ul>

**Table 1. Property types, National Register Criteria, areas of significance, and construction periods adapted from the MPS**

<p><i>Criterion A</i> specific requirements</p> <ul style="list-style-type: none"> <li>- Early and/or prominent project of the Colorado Highway Department (associated area of significance: Transportation)</li> <li>- Association with a significant event (associated area of significance: one or more may apply, see National Register Bulletin <i>How to Complete the National Register Registration Form</i>)</li> <li>- Association with federal work-relief programs (associated area of significance: Politics/Government)</li> </ul>
<p><i>Criterion C</i> specific requirements</p> <ul style="list-style-type: none"> <li>- Representative example (associated area of significance: Transportation)</li> <li>- Engineering achievement (associated area of significance: Engineering)</li> </ul>
<p><b>3. Aesthetic State Roads and Highways</b></p> <p><i>Criterion A</i> specific requirements</p> <ul style="list-style-type: none"> <li>- Early and/or prominent project of the Colorado Highway Department (associated area of significance: Transportation)</li> <li>- Association with a significant event (associated area of significance: one or more may apply, see National Register bulletin <i>How to Complete the National Register Registration Form</i>)</li> <li>- Association with federal work-relief programs (associated area of significance: Politics/Government)</li> </ul> <p><i>Criterion C</i> specific requirements</p> <ul style="list-style-type: none"> <li>- Representative example (associated area of significance: Transportation)</li> <li>- Engineering achievement (associated area of significance: Engineering)</li> <li>- Landscape architecture (associated area of significance: Landscape Architecture)</li> </ul>
<p><b>Historic periods of highway construction:</b></p> <ul style="list-style-type: none"> <li>- Pre Territorial (pre-1861)</li> <li>- Territorial and pre-automobile state roads (1861-1890)</li> <li>- Automobile age (1890-1930)</li> <li>- Depression and World War II (1930-1945)</li> <li>- Postwar Interstate era (1945-1973)</li> <li>- Completion and augmentation of Interstate System (1973-2000)</li> </ul>

Based on the research and analysis of historic data for each highway, the registration requirements of the MPS were applied to provide a recommendation for each highway on whether it appears to possess significance or not, and the appropriate check box or boxes on the inventory form were indicated (see Appendix C for inventory forms for each State Highway).

**(1) Application of the MPS Registration Requirements**

The MPS provides only general guidance to assess significance. For example, under *Criterion A* it states “highways are most likely to be eligible for nomination to the National Register under this criterion in such areas as transportation, recreation, community planning and development, and politics/government”; and under *Criterion C*, roads with a distinctive characteristics of a type, period or method of construction (such as physical features from a Depression-era federal work relief program, as seen in a stone retaining wall, for example), the MPS states “historic highways usually are eligible for nomination to the National Register under a combination of *Criterion A* and *C*, where physical features of the highway or the highway

### Section 3 Evaluation of Historic Significance

as a whole entity can be understood in terms of its relationship to important broad historical patterns.”<sup>2</sup> As a result, State Highways that possess significance have a primary association in the area of Transportation under *Criterion A* and may also possess significance under one or more additional areas of significance under *Criterion A* or *Criterion C*.<sup>3</sup>

The research design and methodology placed each State Highway’s construction and physical development within the context of broad state and regional historical themes and trends. The inventory also sought to identify the role of important individuals who may have been involved in construction and distinctive features of highway design or construction. This information was included in the historic summary included in the *Historic Data* section on the inventory forms.

Research on many State Highways found no evidence of a direct or important association to a historic theme, important individual, or distinctive design or construction features, while other State Highways appeared to have an association with one or more broad historic themes, which suggested possible significance. In many cases, establishing that the State Highway historically had a direct association with these themes in an important way would require detailed research that was not completed due to the scope of the project. In these cases, the evaluation of significance was broadly applied and possible historical associations noted. For example, several State Highways within the Denver metropolitan area had sufficient research to suggest an association with post-World War II suburban development patterns in the area of Community Planning and Development; in other cases, State Highways appeared to have an association with the development of specific mining activities in the area of Industry or by facilitating tourism in the area of Entertainment/Recreation. In these cases, if there was sufficient research to indicate the highway had an association with an important theme or trend, the State Highway was assumed to possess significance unless there was information to the contrary.

To identify distinctive features of highway design or construction under *Criterion C*, research and analysis focused on design that distinguished one State Highway from other State Highways or construction practices that appeared to fall outside the established standards of State Highway design and construction of the time. Research and analysis focused on available plans, a review of the terrain the highway traversed (mountain passes or canyons for example), the presence of notable features along the route (e.g., retaining walls, tunnels, and bridges), previous documentation (e.g., National Register Nominations, Previous site forms from the OAHF’s Compass database), and other secondary sources consulted for each State Highway. Under *Criterion C*, efforts to identify examples of periods and types of highway construction resulted in several highways that appeared to be representative of 1910s, 1920s, or 1930s highway construction, and specific subtypes, such as farm-to-market roads or bypasses. State Highways significant under *Criterion C* also derive significance in the area of Transportation under *Criterion A*. For example, in some cases, a State Highway that possessed significance in the area of Politics/Government for an association with a Depression-era federal work-relief project may also possess

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<sup>2</sup> Autobee, Robert and Deborah Dobson-Brown, Colorado State Roads and Highways, National Register of Historic Places Multiple Property Submission, Office of Archaeology and Historic Preservation, Colorado Historical Society, 2003, F1-2.

<sup>3</sup> It is possible that new information or further research may reveal that a State Highway possesses historic associations and could be evaluated under *Criterion B* or *Criterion D* in the future (see Section 3.A).

significance as an example of a type, period, or method of highway construction for the portions of the highway related to those Depression-era improvements. In other cases, State Highways that possessed significance for their role in facilitating agricultural development in the area of Transportation may also serve as a representative example of an early 1920s farm-to-market road. In these cases, if there was sufficient research to indicate the highway had an association with an important theme or trend, and it appears to display distinctive design or construction features or to serve as a representative example of a period or type of highway construction, the State Highway was assumed to possess significance unless there was information to the contrary.

The general characteristics of State Highways based on identified significance are discussed below.

**(2) General characteristics of State Highways with significance identified**

State Highways that historically provided direct point-to-point connections and whose construction or use facilitated direct access to destinations related to one or more important historic themes (e.g., mining, tourism, or community growth) appeared to meet one or more criteria requirements of the MPS (see Table 1) under one or more of the main property types (Cultural, Engineered, or Aesthetic State Highways). State Highways that possess significance have an association in the area of Transportation under *Criterion A* and may also possess significance under one or more additional areas of significance under *Criterion A* or *Criterion C*. No State Highways were found to possess significance under *Criterion B* or *Criterion D*.

State Highways that possess significance are distinguished from other routes because they connected major centers of population and appeared to provide direct connections and to have played an important role in facilitating the transport of people, goods, and/or materials rather than merely providing routine access between common regional or community destinations and services. Generally, the entire length of the highway was considered to possess significance except when the discrete segments of the highway had a different, earlier, or later development history or were related to different historic themes. Under *Criterion A: Government/Politics*, only the portion of the State Highway associated with the Depression-era federal work-relief project (as evidenced in a review of project and right-of-way plans) possesses significance, and under *Criterion C: Engineering*, State Highways that display distinctive physical design features or construction techniques derive significance only from those portions of the highway that demonstrate the distinctive features.

For State Highways with significance additional guidance is provided in Section 4.B, which includes further investigation to define period of significance and the extent of the highway that contributes to significance by assessing integrity. This follows the practice of CDOT and the SHPO for linear resources in which some highways may have segments that contribute to the significance of the highway while other segments do not support the eligibility of the overall resource.

**(3) General characteristics of State Highways with no significance identified**

State Highways lacking significance did not have a direct and important association with important historic themes and did not provide direct access to a destination associated with an important historic theme. These State Highways provided routine, typical, and common connections and/or served as secondary

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highways and local roads. Generally, State Highways with the following characteristics did not have significance:

- Highways historically located within a community in which the individual contribution of the highway is difficult to distinguish from the larger community roadway system and patterns of development.
- Highways that historically provided access to other highways or local roads; and/or did not provide a point-to-point connection in which the highway appears to have a direct and important relationship to a destination related to an important historic theme; and/or that extend for a relatively short distance and was not part of an earlier route that appeared to possess significance.
- Highways in which there is no information to suggest engineering importance, challenging site conditions (such as mountain passes, tunnels, or major crossings) or an association with a historically important individual in which the highway best represents their work and contributions to history.
- Highways constructed less than 50 years ago that do not appear to exhibit exceptional importance to meet *Criterion Consideration G – Properties that Have Achieved Significance Within the Past Fifty Years*.

For State Highways with no significance, no further investigation should be required to assess integrity, because if a resource lacks significance, integrity is irrelevant. This determination must be consulted upon between CDOT and SHPO.

## 4. Evaluation Results and Subsequent Steps for Significant Highways

### A. Results

Based on the research for each State Highway and the application of the registration requirements of the MPS to evaluate significance, the project found that 77 State Highways possess significance and 74 do not possess significance. Below are tables that provide a breakdown by the main property types—Cultural, Engineered, and Aesthetic State Highways—with further analysis within each type by National Register criterion and areas of significance.

**Table 2. Significance Evaluation Results by MPS Property Type**

MPS Property Type	Number of State Highways that Possess Significance
Cultural State Roads and Highways	1
Engineered State Roads and Highways	50
Aesthetic State Roads and Highways	6
Aesthetic and Engineering State Roads and Highways	5
Cultural and Engineering State Roads and Highways	15
<i>Total</i>	<i>77</i>

**Table 3. Significance Evaluation Results Summary by MPS Property Type**

MPS Property Type	Highway No.	Criterion/Area(s) of Significance	
		<i>Criterion A</i>	<i>Criterion C</i>
Cultural State Roads and Highways	86	Transportation	
Engineered State Roads and Highways	1	Transportation	
	2	Transportation, Community Planning and Development	
	6	Transportation, Politics/Government	
	9	Transportation, Industry	Engineering
	10	Transportation, Industry	
	12	Transportation, Industry, Politics/Government	
	13	Transportation	
	14	Transportation, Entertainment/Recreation	
	26	Transportation, Community Planning and Development	
	30	Transportation, Community Planning and Development	

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**Evaluation Results and Subsequent**  
**Steps for Significant Highways**

**Table 3. Significance Evaluation Results Summary by MPS Property Type**

MPS Property Type	Highway No.	Criterion/Area(s) of Significance	
		<i>Criterion A</i>	<i>Criterion C</i>
Engineered State Roads and Highways (continued)	36	Transportation, Entertainment/Recreation	
	40	Transportation, Politics/Government	Engineering
	46	Transportation, Politics/Government	
	52	Transportation	
	61	Transportation	
	66	Transportation, Entertainment/Recreation	
	67	Transportation, Industry, Politics/Government	
	72	Transportation, Entertainment/Recreation	
	78	Transportation, Entertainment/Recreation, Politics/Government	
	83	Transportation	
	84	Transportation, Entertainment/Recreation	
	85	Transportation, Politics/Government	Engineering
	88	Transportation, Community Planning and Development	
	91	Transportation, Industry	
	92	Transportation, Politics/Government	
	93	Transportation, Entertainment/Recreation, Industry, Military	
	94	Transportation, Politics/Government	
	95	Transportation, Community Planning and Development	
	97	Transportation, Community Planning and Development	
	100	Transportation	
	101	Transportation, Politics/Government	
	105	Transportation	
	110	Transportation, Commerce	
112	Transportation		
113	Transportation		
115	Transportation, Politics/Government		
125	Transportation, Industry		
131	Transportation, Politics/Government		

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**Table 3. Significance Evaluation Results Summary by MPS Property Type**

MPS Property Type	Highway No.	Criterion/Area(s) of Significance	
		<i>Criterion A</i>	<i>Criterion C</i>
Engineered State Roads and Highways (continued)	133	Transportation, Industry	
	139	Transportation	
	141	Transportation, Military	
	149	Transportation, Commerce, Entertainment/Recreation	
	150	Transportation, Entertainment/Recreation	
	170	Transportation	
	183	Transportation, Military	
	265	Transportation	
	285	Transportation, Entertainment/Recreation, Politics/Government	
	291	Transportation	
	300	Transportation, Conservation	
	391	Transportation, Community Planning and Development	
Aesthetic State Roads and Highways	5	Transportation, Entertainment/Recreation, Politics/Government	Engineering
	8	Transportation, Community Planning and Development	
	65	Transportation, Entertainment/Recreation	
	74	Transportation, Community Planning and Development, Politics/Government	Engineering, Landscape Architecture
	82	Transportation, Entertainment/Recreation, Industry	Engineering
	103	Transportation, Entertainment/Recreation, Politics/Government	Engineering
Aesthetic and Engineering State Roads and Highways	7	Transportation, Entertainment/Recreation	Engineering
	17	Transportation, Entertainment/Recreation	Engineering
	34	Transportation, Entertainment/Recreation, Politics/Government	Engineering

**Table 3. Significance Evaluation Results Summary by MPS Property Type**

MPS Property Type	Highway No.	Criterion/Area(s) of Significance	
		Criterion A	Criterion C
Aesthetic and Engineering State Roads and Highways (continued)	119	Transportation, Entertainment/Recreation, Industry	Engineering
	550	Transportation	Engineering
Cultural and Engineering State Roads and Highways	3	Transportation	
	15	Transportation	
	24	Transportation, Entertainment/Recreation, Politics/Government	Engineering
	50	Transportation, Entertainment/Recreation, Politics/Government	Engineering
	64	Transportation	
	96	Transportation	
	114	Transportation, Politics/Government	
	138	Transportation	Engineering
	144	Transportation	Engineering
	159	Transportation	
	160	Transportation, Entertainment/Recreation	Engineering
	287	Transportation	
	350	Transportation, Politics/Government	
	389	Transportation	
491	Transportation		

Appendix C provides inventory forms for each of the 151 State Highways and Appendix B provides a tabular summary of State Highways that possess significance and State Highways that do not possess significance.

**B. Subsequent steps for significant highways**

State Highways that possess significance must retain integrity to be eligible for the National Register. According to the National Register guidance, historic integrity is “the ability of a property to convey its significance.”<sup>4</sup> It is necessary to have a clear understanding of why and when a highway was important to determine what its essential physical features are, and to understand which aspects of historic integrity are most important to convey its significance. For this reason, the period of significance and the essential

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<sup>4</sup> U.S. Department of the Interior, National Park Service, *National Register Bulletin: How to Apply the National Register Criteria for Evaluation* (1991, rev), 44.

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physical features must be identified to assess seven aspects of integrity (location, design, setting, materials, workmanship, feeling, and association).

Typically, assessing integrity will usually be focused more narrowly on the segment of State Highway within a project's Area of Potential Effects (APE); however, CDOT may also assess the integrity of the entire length of a highway.<sup>5</sup> In assessing historic integrity, the segment or the entire length of the State Highway within the APE must convey the essential physical features and generally be of a distance long enough to provide a sense of time and place and travel experience related to the period(s) of significance.

When assessing integrity, CDOT should be consulted early in the process to provide guidance on identifying the period(s) of significance, essential physical features, and what aspects of integrity are most important to convey significance. Assessing the integrity of state highways was not completed as part of this project. CDOT and the SHPO may decide to provide guidance on how the seven aspects of integrity relate to highways and develop a list of essential physical features that typically relate to specific areas of significance under each National Register criteria to guide future integrity assessments.

Below is basic guidance to consider during subsequent work on State Highways that possess significance.

**(1) Defining period of significance**

The period of significance is based on an understanding of the area(s) of significance for the State Highway. Information on the inventory form will assist in identifying the appropriate period of significance. The appropriate period of significance should be identified for each specific criterion and area of significance.

The National Register Bulletin *How to Complete the National Register Registration Form* states the period of significance is the "length of time when a property was associated with important events, activities, or person, or attained the characteristics which qualify it for National Register listing."<sup>6</sup> Under *Criterion A* the period of significance for a State Highway may span many years to encompass its continued use and association with the area of significance. Under *Criterion C* the period of significance for State Highways may be relatively short, as it relates to the highway's date of construction or subsequent improvement. A highway with more than one area of significance may have varied (overlapping or discontinuous) periods of significance representing the time associated with multiple areas of significance.

**(2) Identifying essential physical features**

Essential physical features are those features that were present during the period of significance and are required to understand its significance.<sup>7</sup> According to the National Register guidance, "the essential

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<sup>5</sup> The identification of essential physical features requires consideration beyond the APE when the highway or segment of highway found to possess significance extends beyond the APE.

<sup>6</sup> U.S. Department of the Interior, National Park Service, *National Register Bulletin: How to Apply the National Register Criteria for Evaluation* (1991, rev), 42.

<sup>7</sup> Physical features not present during a highway's period of significance cannot be essential physical features.

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physical features are those features that define both *why* a property is significant (applicable Criteria and areas of significance) and *when* it was significant (period(s) of significance).”<sup>8</sup>

A State Highway is a linear structure that consists of a roadbed and roadbed-related features. Each State Highway will derive significance from a unique set of physical features and will require investigation to determine which roadbed and roadbed-related features are essential to understand the significance under *Criterion A* and/or *Criterion C*. Identification of essential physical features should consider the physical features present during the period of significance for the segment of the State Highway within the APE or the entire length of the State Highway, as appropriate.

For State Highways with significance under *Criterion A*, the essential physical features will often demonstrate their historic function of providing an important connection between one or more destinations related to the State Highway’s significance. For highways with significance under *Criterion C*, the essential physical features will typically demonstrate the important roadway design or specific construction features related to its engineering significance or the extent of the highway that clearly conveys itself as a representative example of its type. Roadbed and roadbed-related features determined not to be necessary in understanding a highway’s significance should not be identified as essential physical features.

If the essential physical features of the highway are present, the segment of highway being evaluated must demonstrate most if not all of the seven aspects of integrity to convey the highway’s significance and historic identity. Assessing historic integrity requires linking the information known about the highway’s significance with its present appearance and assessing its ability to visually convey its significance. The assessment of historic integrity for State Highways deriving significance under *Criterion A* will differ from the assessment for integrity under *Criterion C* because the themes a State Highway represents will vary.

According to National Register guidance, “It is not necessary for a property to retain all its historic physical features or characteristics. The property must retain, however, the essential physical features that enable it to convey its historic identity.”<sup>9</sup> When considering integrity, alterations or changes to the highway should be identified and determined if they occurred within the highway’s period(s) of significance as defined for the area of significance being assessed. The assessment needs to determine if the changes impact essential physical features and the degree the changes diminish the aspects of integrity. The size and scale of the change needs to be considered to determine if the change is severe enough to diminish particular aspects of integrity important to the significance. Not all alterations, including those to essential physical features, will diminish a highway’s historic integrity to the degree that it can no longer convey significance. In addition to assessing individual changes, the cumulative effect of multiple changes to a variety of roadbed and roadbed-related features, including essential physical features, may collectively

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<sup>8</sup> U.S. Department of the Interior, National Park Service, *National Register Bulletin: How to Apply the National Register Criteria for Evaluation*, 46.

<sup>9</sup> U.S. Department of the Interior, National Park Service, *National Register Bulletin: How to Apply the National Register Criteria for Evaluation*, 46.

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diminish important aspects of historic integrity and hinder a highway's ability to convey significance. If there is a loss of the essential physical features and a loss of integrity to the level that the historic identity can no longer be conveyed, then the highway no longer retains integrity and is not eligible.

To provide consistency in completing assessments, CDOT and the SHPO may decide to develop guidance on the essential physical features that typically relate to specific areas of significance and National Register Criteria and how various types of alterations diminish aspects of integrity.

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**Appendix A. Colorado State Roads and Highway MPS Update,  
2000-2015**

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## **Introduction**

In 2002 Associated Culture Resource Experts (ACRE) prepared a historic context of the State Highway System, *Highways to the Sky* (HTS), for the Colorado Department of Transportation (CDOT), in partnership with the Office of Archaeology and Historic Preservation (OAHP). The publication included summaries of the history and National Register of Historic Places (National Register) eligibility for 10 highways. ACRE also prepared OAHP site forms for the 10 highways.

In 2003 the National Register staff at OAHP edited and re-formatted the document into the *Colorado State Roads and Highways Multiple Property Submission* (MPS). The MPS was approved for use in the State Register program as a historic context, but OAHP did not forward it to the Keeper of the National Register. OAHP staff updated the MPS historic context with supplemental historical background information, established property types, and developed registration requirements to use in preparing significance evaluations of highways.

In late 2014 CDOT contracted with Mead & Hunt, Inc. (Mead & Hunt) and Dill Historians to prepare an update the MPS and prepare significance evaluations for all of the state's highways using the MPS as a guide. CDOT requested an update with contextual information on the significant events and construction projects that have affected the State Highway System since 2000, the cutoff date for HTS and the MPS.

This update of significant events between 2000 and 2015 has been divided into two sections. The first section describes the economic and political landscape in Colorado during this period. In particular, new programs at CDOT focus on alternative modes of transportation and innovative financing to maintain and improve the State Highway System. Section 2 describes major environmental studies and construction projects that have affected the State Highway System since 2000.

Section 1 should be inserted after Section E, pages 3-7 of the MPS, and Section 2 should be inserted after Section E, page 51 of the MPS. The development of both sections is based on information found on CDOT's Projects web page and individual web pages for large corridor projects ("Projects" and "Programs").

## **Section 1: Updates to the Economic and Political Landscape**

Since 2000 shifts in the economic and political landscape in Colorado have demanded new solutions for highway construction and financing. CDOT has been managing with less funding for many years, and the agency has diversified funding partnerships to keep the system running. Declines in gas tax revenue have forced many transportation agencies to build tolled highways. Tolling began in Colorado in 1987 when the legislature passed the Public Highway Authority Law. The legislation allowed cities and counties to establish toll highways separately from CDOT. The first was E-470, on the eastern perimeter of the Denver metropolitan area, built between 1989 and 2003, which was the first tolled highway in Colorado since the opening of the Denver-Boulder Turnpike in 1951. The highway is managed by the E-470 Public Highway Authority, comprised of the eight counties and cities that the highway serves, as well as CDOT, the Denver Regional Council of Governments (DRCOG), and the Regional Transportation District (RTD). Another toll road, the Northwest Parkway, opened in 2003 and connected Interstate Highway (I-) 25 and U.S. Highway (US) 36 in the northwestern suburbs. It was the first privately funded toll road in Colorado because no public funds or tax dollars were used for its construction or maintenance. In 2002, legislation created the Colorado Tolling Enterprise, a non-profit business within CDOT. In 2006, the first toll project of the CTE opened, a high-occupancy vehicle/toll lane on I-25 between Denver and the Boulder Turnpike. These tolled highways set a new standard for future highway projects on the state system.

Highway design and construction management has also become more streamlined since 2000. Construction used to halt between November and February, but improvements are now built year-round, due to advances in cold weather protection gear for workers and public expectations that projects will get done faster and with less disruption. Innovative project management methods, including Accelerated Bridge Construction, Contractor Manager-General Contractor, and Design-Build, have consolidated design, environmental, and construction phases and dictate that some design and environmental clearances will occur concurrent with construction, if necessary. This trend has been bolstered by programs such as the American Recovery and Reinvestment Act, signed by President Barack Obama in 2009, which provided over \$500 million for statewide transportation projects and required 50 percent of the funds to be committed within 120 days, with the remainder to be allocated within one year ("ARRA"). Additionally, natural disasters such as heavy snowfall, wildfires, and flooding also require emergency response teams to mobilize quickly to make repairs and clean up roadways year-round.

CDOT has also become more sophisticated in communicating to the traveling public. Beginning with the success of the Transportation Expansion Project (T-REX) on I-25 and I-225 in Denver, CDOT provided updates regarding construction delays and projects, and designed the project to be less disruptive during peak travel periods. This trend has continued as CDOT employs text messaging, emails, web pages (CoTrip.org), and a smartphone application that provides updates to travelers so they can make informed travel decisions and decide to stay off roads during congested periods. Intelligent Transportation Systems have become important for safety and mobility and CDOT has created a fiber optic infrastructure, including traffic cameras, closed caption televisions, variable message boards, and other traveler information services.

Private automobiles are also becoming less attractive to commuters. Proving that a majority of citizens favored public investment in transit, in 2004, voters in the Denver metro region approved the Regional

Transportation District (RTD) FasTracks expansion. The system of light rail and commuter rail connects major corridors in the metro area to Union Station and Denver International Airport. Communities in Colorado have experienced substantial growth since 2000, particularly in Denver for people under the age of 35. However, even though bicycles, bus transportation, light rail, and commuter rail provide viable transit options in metro Denver, private automobiles remain the primary form of transportation in Denver and Colorado.

CDOT struggled with a deteriorating highway system and a recession in the first decade of the twenty-first century. But in 2009, passage of the Funding Advancement for Surface Transportation and Economic Recovery (FASTER) bill helped find an ongoing revenue source for long-delayed bridge replacements, as well as transit and safety projects. The law was the first new dedicated source of funding for transportation capital improvement projects in Colorado in twenty years and funded by surcharges on vehicle registration based on vehicle weight (“Faster”).

In 2009, FASTER created the Colorado Bridge Enterprise (CBE)—a government owned business within CDOT—to address maintenance issues on bridges and pay for repairs, reconstruction, and replacement of structurally deficient or functionally obsolete bridges. Funded by a bridge safety surcharge imposed on vehicle registrations, the CBE is repairing and/or replacing 133 bridges due to functional obsolescence and/or structural deficiencies (“Bridge Enterprise”).

FASTER also created the High Performance Transportation Enterprise (HPTE), which replaced the Colorado Tolling Enterprise that had been established in 2002. HPTE is a governmental body that finds and manages viable Public-Private Partnerships (P3) to finance large corridor improvement projects through managed lanes that will charge tolls for single-occupancy vehicles during peak congestion hours. Corridors supported by HPTE include US 36 between Boulder and Denver, I-25 north of Denver, I-70 East, and the I-70 Mountain Corridor peak period shoulder lanes. Tolling will only be used during high traffic periods (e.g., Sunday afternoons and holidays for the Mountain Corridor), and the price will be dynamic to encourage drivers to use the lane at low traffic times instead of high traffic times, when it will be more expensive. Funding is based on leveraging private sector participation. Private partners have long term operational and maintenance responsibilities and keep the collected toll revenue (“High Performance”).

Finally, the FASTER legislation established and funded a new Division of Transit and Rail at CDOT. The program released the Colorado State Freight and Passenger Rail Plan in 2012, which made CDOT eligible to receive Federal Railroad Administration funding for transit projects. In 2014 CDOT announced the start of a new bus service, Bustang, on I-25 between Denver and Colorado Springs, and on I-70 between Denver and Glenwood Springs. The program also provides transit grants to local governments and partners throughout the state and works with transit partners on options for I-25, US 36, and I-70 (“Transit and Rail”).

## **Section 2: Updates on Highway Projects, 2000-2015**

This section focuses on major highway projects between 2000 and 2015 and is primarily focused on the two main corridors that cross Colorado: I-25 (from north to south), and I-70 (from east to west). These corridors have required extensive and complicated environmental study and accelerated construction schedules to decrease impacts to the traveling public. Since 2009, financing for these large corridor projects has been managed by the HPTE and tolling during peak travel periods will be incorporated on segments of these interstates in the future. Beyond the interstates, US 36 between Denver and Boulder has also been a major project for CDOT. When CDOT announced the plan to enter into a tolling and concession agreement with a private partner to build and maintain US 36 and I-25 between US 36 and downtown Denver, an unexpected public protest resulted over concerns about the length of time of the contract (50 years) and the transfer of public roads to the private sector. The section concludes with CDOT's repair and rebuilding of highways damaged by the wildfires of 2012 and flooding of 2013, which forced the agency to become more flexible and responsive to address natural disasters.

### **I-25 Projects**

Urban segments of the 1960s Interstate Highway System could no longer handle the traffic numbers of the twenty-first century, making expansion of I-25 along the Front Range critical. The only city on I-25 awaiting major improvements is Pueblo, but that expansion project is expected soon.

The first major expansion of I-25 and I-225 in the Denver metro area started in 2000 (known as T-REX). The project cost \$1.67 billion for highway and light rail expansion along I-25 and part of I-225, and took place between 2001 and 2006. It reconstructed 17 miles of I-25 and I-225 and extended the light rail system 19 miles, and finished two years early and \$39 million under budget. T-REX was the first major corridor project to utilize the Design-Build project management system in Colorado and the first to locate all of the project personnel in one office to minimize the amount of time needed for coordination between agencies and contractors ("T-REX").

North of T-REX, the Valley Highway project reconstructed I-25 from Logan Street to 6th Avenue, and the 6th Avenue Freeway to Federal Boulevard. Construction started in 2010 to rebuild complicated interchanges at Alameda and Santa Fe avenues that removed the original highway bridges in the core of Denver ("Valley Highway"). South of T-REX, beginning in 2014, CDOT expanded I-25 between Lincoln Avenue and County Line Road, in the southern Denver metro area. The project removed the existing median barrier and widened the northbound side of I-25 to expand the Interstate to four lanes in each direction ("Lincoln Avenue").

I-25 also expanded in Colorado Springs with the Colorado Springs Metro Interstate Expansion (COSMIX) project between 2005 and 2007. The project rebuilt the highway to three lanes in each direction within a 12-mile segment between Bijou on the south and North Academy on the north. The total cost was \$150 million and it also finished early using a 24 hours a day, seven days a week work schedule to minimize traffic congestion during peak travel hours ("COSMIX"). The Interstate expansion continued on the north side of Colorado Springs up to the town of Monument, widening the highway in three lanes in each direction. CDOT also rebuilt the interchange at I-25 and US 24 in downtown Colorado Springs ("Projects").

Some projects are longer in duration, such as work on I-25 through Pueblo, known as the New Pueblo Freeway, where the environmental process started in 2000 and included a visioning process with the community of Pueblo, CDOT, and Federal Highway Administration (FHWA). The initial construction of I-25 through Pueblo—known as the Pueblo Freeway Project—was started in 1949 and completed in 1959. The Pueblo Freeway project extended through older neighborhoods that were bisected by the roadway and were not subject to evaluation under environmental laws such as the National Environmental Policy Act (NEPA) or Section 106 of the National Historic Preservation Act. The first project on the New Pueblo Freeway corridor, the I-25 Bridges over Ilex and UPRR, is beginning in May 2015 (“Pueblo”).

More Interstate construction was completed in Trinidad, north of the New Mexico border, where a substandard curve slowed traffic and created hazardous conditions, creating the need for the Interstate to be rebuilt. The work was completed in three phases between 2004 and 2011 and involved reconstructing 1.1 miles of I-25, which included a 2,000-foot viaduct, and reconstructing State Highway (SH) 12 from I-25 to Main Street (“Trinidad”).

The Interstate has also experienced significant congestion due to growth of the north metro area suburbs and other communities north of Denver requiring improvements between Fort Collins/Wellington and downtown Denver along I-25, as well as improvements on US 85 and US 87. Transit alternatives include Bus Rapid Transit (BRT), commuter bus, and commuter rail. As of 2015, the first phase of improvements had not commenced, but will include adding a tolled express lane in each direction from US 36 to 120th Avenue, with a second phase adding one additional lane in each direction from 120th Avenue to SH 7. These tolled express lanes will be open to carpools, vans, and buses for free, but vehicles with one or two occupants will pay a toll. The design utilizes the existing inside shoulder of the highway to decrease the amount of widening necessary to add two more lanes to the interstate (“North I-25”).

### **I-70 Projects**

The focus of I-70 projects has been the corridor in metro Denver (I-70 East) and the corridor west of Denver that links the city to several ski areas and historic mining towns (I-70 Mountain Corridor). Controversies quickly erupted among residents who would be affected by improvements in both segments of the planned I-70 projects. After a contentious start, the Mountain Corridor streamlined the environmental review process and completed several key projects on the corridor aimed at decreasing peak period congestion on Sunday afternoons and holidays. Within Denver, local citizens complained about the effects the I-70 East viaduct project would have on their neighborhood. CDOT worked with them to develop an alternative that helps reconnect local streets and minimize effects on an elementary school next to the interstate.

#### *Mountain Corridor*

The I-70 Mountain Corridor is defined as the corridor between C-470, the edge of the Denver metropolitan area, and Glenwood Springs, a distance of 144 miles. Population growth in the Denver metro area and in other communities along the corridor created congestion and traffic delays on weekends and holidays for both westbound and eastbound travelers. Westbound travelers also experienced delays during the workweek. In 2000 CDOT began studying the problems and convened a group of stakeholders to recommend solutions.

The process relied on a Collaborative Effort Team effort which required CDOT and FHWA to make decisions with corridor stakeholders, and to decide which projects should be implemented. The Collaborative Effort Team involved 27 member representatives, including towns, counties, environmental groups, ski areas, federal and state agencies, and associations representing freight, commuter, and rail service. The process helped restore trust in CDOT and was conducted by the U.S. Institute for Environmental Conflict Resolution. The team also worked on making recommendations for specific projects and will continue to participate in decisions for future corridor improvement projects (“Mountain Corridor”).

The first project on the Mountain Corridor was the Twin Tunnels reconstruction, east of Idaho Springs. Built for the original path of I-70 in 1961, the tunnels created a choke point as drivers braked before entering the narrow dark tunnel entrances. The tunnels were National Register-eligible and listed as exceptions to the Historic Preservation Exemption for the Interstate Highway System, an agreement signed by FHWA and the Advisory Council on Historic Preservation (ACHP) in 2005. The Section 106 mitigation (under the implementing regulations of the National Historic Preservation Act) included a 20-minute video and archival documentation. The eastbound tunnel was enlarged in 2013 and the westbound in 2014. The new tunnels accommodate three lanes of traffic in each direction. In 2014 the Colorado Legislature passed a bill to rename them the Veterans Memorial Tunnels (“Twin Tunnels”).

CDOT also received accolades from the Town of Georgetown, the Town of Silver Plume, ACHP, FHWA, and State Historic Preservation Officer for its approach to rockfall mitigation projects on the I-70 Mountain Corridor within the Georgetown-Silver Plume National Historic Landmark. A 2000 Programmatic Agreement addressed the cumulative adverse effects of rockfall mitigation projects within a 2-mile stretch of I-70 that experienced significant rockfall hazards. These projects installed catchment structures with posts, nets, and mesh that modified the appearance of the hill within the landmark district. CDOT acknowledged the adverse effects and the need for consultation. Mitigation included painstakingly matching the colors of the posts, nets, and mesh to blend into the existing slopes, and creating a video about the relationship of the mining geology of the area to the mining industry, the historic towns of Georgetown and Silver Plume, and the building of I-70 (“Georgetown Rockfall”).

#### *Eat Corridor*

The I-70 East corridor is defined as the area between Brighton Boulevard in Denver to the Denver International Airport. Hampered by decades of resentment from local citizens who protested the original construction of the I-70 viaduct in the early 1960s, the public involvement process also started off with controversy. The viaduct is an elevated portion of the interstate east of I-25 near the Denver Coliseum and the National Western Stock Show that cut through the neighborhoods of Elyria and Swansea along 46th Avenue. Now in serious need of replacement, the 50-year-old viaduct became the focus of community concern during the initial environmental study.

During the environmental study for the corridor, CDOT sought public comment on rebuilding I-70 on its existing alignment, as well as another alternative that would have realigned I-70 along Brighton Boulevard and I-270 and returned the path of I-70 along 46th Avenue back to a local arterial street. A lack of support for any of the alternatives led CDOT to form the Preferred Alternative Collaborative Team (PACT) to study all available alternatives, including those previously eliminated. As a result of this process,

CDOT revived an alternative that recommended lowering and placing a partial cover on the section across from a local elementary school. The viaduct would be removed between Brighton Boulevard and Colorado Boulevard and I-70 rebuilt below the existing grade on its current alignment. The alternative also includes managed lanes with variable tolling during peak periods of congestion. The HPTE advertised for private sector partners to submit qualifications to create a financial package for the corridor (“I-70 East”) and will select a team in 2017.

### **US 36**

US 36 connects Denver to Boulder through a heavily congested area and is connected to I-25 and I-270 in the north metro area. In addition to an 18-mile bikeway, the improvements include a Bus Rapid Transit lane in each direction, which will provide a dedicated lane for special buses, high occupancy vehicles, and tolled vehicles that will avoid the traffic and congestion in general purpose lanes. The project also includes adding two general purpose lanes that won’t be subject to tolls. The HPTE selected Plenary Roads, a consortium of six companies, who will finance, design, construct, and maintain the road, as the private partner, or concessionaire, for the project. The contract with Plenary Roads is the first public-private partnership (P3) executed by the HPTE and CDOT. Protests over the concession agreement occurred after some members of the public complained that the 50-year contract hands over too much power and control to a private entity. Other protesters argued that by making an express lane with a high toll on US 36, CDOT is excluding drivers who can’t afford to pay the tolls (“US 36”).

### **Natural Disasters**

While CDOT’s maintenance employees are accustomed to clearing highways during and after large snowfall and blizzard events, other natural disasters have tested the limits of the emergency crews. In 2012, wildfires in Colorado Springs, Woodland Park, and mountainous areas in northwestern Colorado west of Fort Collins closed State Highways to facilitate evacuations of citizens in those areas. Extensive repairs were necessary due to fires, mudslides, rock falls, washouts, and debris in the roads (“Wildfires”).

A slow-moving cold front stalled over the Front Range in September 2013, resulting in excessive rainfall, flooding, and mudslides that damaged highways in northern and eastern Colorado, closing 39 State or Interstate Highways, as well as numerous local roads. Colorado Governor John Hickenlooper declared a disaster emergency on September 12, followed by a Major Disaster Declaration by President Barack Obama on September 14. One-hundred-twenty bridges needed to be repaired or replaced on State Highways and many more on county and city roads. Governor Hickenlooper asked CDOT to open the roads by December 1, 2013, which required a cooperative effort between CDOT, the Federal Emergency Management Agency (FEMA), FHWA, National Guard, local agencies, 39 contractors, and three consultant teams. CDOT created a Flood Recovery Office in Loveland and was able to open all of the state roads by the deadline, though additional work was ongoing after December 1. Emergency repairs were completed in 2014 and in 2015 through the end of 2017 efforts are focused on permanent reconstruction of highways. The main highways that required rebuilding are US 36 between Estes Park and Lyons, US 34 between Estes Park and Loveland, US 34 in Greeley, SH 119 west of Boulder, and SH 7 between Estes Park and Lyons. The flooding washed away historic features along these roads, including stone retaining walls, barriers, culverts, and bridges, as well as numerous historic cabins and other properties (“Floods”).

## **Conclusion**

The amount of change experienced on the state's highways during the last 15 years is surprising in its scope and breadth. CDOT dealt with an economic recession, decreased and flat gas tax revenues, public controversies, tolling, and natural disasters, all while making slow progress on environmental studies and projects to improve roadways and bridges. The basic engineering and construction process used to build highways has not changed, but the methods of managing and paying for these construction projects has become more complicated and diverse as more stakeholders have become interested in the decision-making process.

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Projects: <https://www.codot.gov/programs-projects/projects>

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**Appendix B. Summary of Significance Evaluations**

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**B1. List of Significant State Highways (Organized Numerically by State Highway Number)**

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## Appendix B.1 - List of Significant State Highways (Organized Numerically by State Highway Number)

Highway Name	National Register Evaluation
State Highway (SH) 1	Significant, integrity assessment required
State Highway (SH) 2	Significant, integrity assessment required
State Highway (SH) 3	Significant, integrity assessment required
State Highway (SH) 5	Significant, integrity assessment required
U.S. Highway (US) 6	Significant, integrity assessment required
State Highway (SH) 7	Significant, integrity assessment required
State Highway (SH) 8	Significant, integrity assessment required
State Highway (SH) 9	Significant, integrity assessment required
State Highway (SH) 10	Significant, integrity assessment required
State Highway (SH) 12	Significant, integrity assessment required
State Highway (SH) 13	Significant, integrity assessment required
State Highway (SH) 14	Significant, integrity assessment required
State Highway (SH) 15	Significant, integrity assessment required
State Highway (SH) 17	Significant, integrity assessment required
U.S. Highway (US) 24	Significant, integrity assessment required
State Highway (SH) 26	Significant, integrity assessment required
State Highway (SH) 30	Significant, integrity assessment required
U.S. Highway (US) 34	Significant, integrity assessment required
U.S. Highway (US) 36	Significant, integrity assessment required
U.S. Highway (US) 40	Significant, integrity assessment required
State Highway (SH) 46	Significant, integrity assessment required
U.S. Highway (US) 50	Significant, integrity assessment required
State Highway (SH) 52	Significant, integrity assessment required
State Highway (SH) 61	Significant, integrity assessment required
State Highway (SH) 64	Significant, integrity assessment required
State Highway (SH) 65	Significant, integrity assessment required
State Highway (SH) 66	Significant, integrity assessment required
State Highway (SH) 67	Significant, integrity assessment required
State Highway (SH) 72	Significant, integrity assessment required
State Highway (SH) 74	Significant, integrity assessment required
State Highway (SH) 78	Significant, integrity assessment required

## Appendix B.1 - List of Significant State Highways (Organized Numerically by State Highway Number)

Highway Name	National Register Evaluation
State Highway (SH) 82	Significant, integrity assessment required
State Highway (SH) 83	Significant, integrity assessment required
State Highway (SH) 84	Significant, integrity assessment required
U.S. Highway (US) 85	Significant, integrity assessment required
State Highway (SH) 86	Significant, integrity assessment required
State Highway (SH) 88	Significant, integrity assessment required
State Highway (SH) 91	Significant, integrity assessment required
State Highway (SH) 92	Significant, integrity assessment required
State Highway (SH) 93	Significant, integrity assessment required
State Highway (SH) 94	Significant, integrity assessment required
State Highway (SH) 95	Significant, integrity assessment required
State Highway (SH) 96	Significant, integrity assessment required
State Highway (SH) 97	Significant, integrity assessment required
State Highway (SH) 100	Significant, integrity assessment required
State Highway (SH) 101	Significant, integrity assessment required
State Highway (SH) 103	Significant, integrity assessment required
State Highway (SH) 105	Significant, integrity assessment required
State Highway (SH) 110	Significant, integrity assessment required
State Highway (SH) 112	Significant, integrity assessment required
State Highway (SH) 113	Significant, integrity assessment required
State Highway (SH) 114	Significant, integrity assessment required
State Highway (SH) 115	Significant, integrity assessment required
State Highway (SH) 119	Significant, integrity assessment required
State Highway (SH) 125	Significant, integrity assessment required
State Highway (SH) 131	Significant, integrity assessment required
State Highway (SH) 133	Significant, integrity assessment required
U.S. Highway (US) 138	Significant, integrity assessment required
State Highway (SH) 139	Significant, integrity assessment required
State Highway (SH) 141	Significant, integrity assessment required
State Highway (SH) 144	Significant, integrity assessment required
State Highway (SH) 149	Significant, integrity assessment required

## Appendix B.1 - List of Significant State Highways (Organized Numerically by State Highway Number)

Highway Name	National Register Evaluation
State Highway (US) 150	Significant, integrity assessment required
State Highway (SH) 159	Significant, integrity assessment required
U.S. Highway (US) 160	Significant, integrity assessment required
State Highway (SH) 170	Significant, integrity assessment required
State Highway (SH) 183	Significant, integrity assessment required
State Highway (SH) 265	Significant, integrity assessment required
U.S. Highway (US) 285	Significant, integrity assessment required
State Highway (SH) 287	Significant, integrity assessment required
State Highway (SH) 291	Significant, integrity assessment required
State Highway (SH) 300	Significant, integrity assessment required
U.S. Highway (US) 350	Significant, integrity assessment required
State Highway (SH) 389	Significant, integrity assessment required
State Highway (SH) 391	Significant, integrity assessment required
U.S. Highway (US) 491	Significant, integrity assessment required
U.S. Highway (US) 550	Significant, integrity assessment required
<i>Total Number of Significant State Highways: 77</i>	

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**B2. List of Not Significant State Highways (Organized Numerically by State Highway Number)**

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## Appendix B.2 - List of Not Significant State Highways (Organized Numerically by State Highway Number)

Highway Name	National Register Evaluation
State Highway (SH) 11	Not Significant
State Highway (SH) 16	Not Significant
State Highway (SH) 21	Not Significant
State Highway (SH) 22	Not Significant
State Highway (SH) 23	Not Significant
State Highway (SH) 35	Not Significant
State Highway (SH) 39	Not Significant
State Highway (SH) 41	Not Significant
State Highway (SH) 42	Not Significant
State Highway (SH) 44	Not Significant
State Highway (SH) 45	Not Significant
State Highway (SH) 47	Not Significant
State Highway (SH) 53	Not Significant
State Highway (SH) 55	Not Significant
State Highway (SH) 56	Not Significant
State Highway (SH) 57	Not Significant
State Highway (SH) 58	Not Significant
State Highway (SH) 59	Not Significant
State Highway (SH) 60	Not Significant
State Highway (SH) 62	Not Significant
State Highway (SH) 63	Not Significant
State Highway (SH) 69	Not Significant
State Highway (SH) 71	Not Significant
State Highway (SH) 75	Not Significant
State Highway (SH) 79	Not Significant
State Highway (SH) 89	Not Significant
State Highway (SH) 90	Not Significant
State Highway (SH) 109	Not Significant
State Highway (SH) 116	Not Significant
State Highway (SH) 120	Not Significant
State Highway (SH) 121	Not Significant

## Appendix B.2 - List of Not Significant State Highways (Organized Numerically by State Highway Number)

Highway Name	National Register Evaluation
State Highway (SH) 127	Not Significant
State Highway (SH) 128	Not Significant
State Highway (SH) 134	Not Significant
State Highway (SH) 135	Not Significant
State Highway (SH) 136	Not Significant
State Highway (SH) 140	Not Significant
State Highway (SH) 142	Not Significant
State Highway (SH) 145	Not Significant
State Highway (SH) 151	Not Significant
State Highway (SH) 157	Not Significant
State Highway (SH) 165	Not Significant
State Highway (SH) 167	Not Significant
State Highway (SH) 172	Not Significant
State Highway (SH) 177	Not Significant
State Highway (SH) 184	Not Significant
State Highway (SH) 194	Not Significant
State Highway (SH) 196	Not Significant
State Highway (SH) 202	Not Significant
State Highway (SH) 207	Not Significant
State Highway (SH) 209	Not Significant
State Highway (SH) 224	Not Significant
State Highway (SH) 227	Not Significant
State Highway (SH) 231	Not Significant
State Highway (SH) 233	Not Significant
State Highway (SH) 239	Not Significant
State Highway (SH) 257	Not Significant
State Highway (SH) 263	Not Significant
State Highway (SH) 266	Not Significant
State Highway (SH) 317	Not Significant
State Highway (SH) 318	Not Significant
State Highway (SH) 325	Not Significant

## Appendix B.2 - List of Not Significant State Highways (Organized Numerically by State Highway Number)

Highway Name	National Register Evaluation
State Highway (SH) 330	Not Significant
State Highway (SH) 340	Not Significant
State Highway (SH) 347	Not Significant
State Highway (SH) 348	Not Significant
State Highway (SH) 368	Not Significant
State Highway (SH) 370	Not Significant
State Highway (SH) 371	Not Significant
U.S. Highway (US) 385	Not Significant
State Highway (SH) 392	Not Significant
State Highway (SH) 394	Not Significant
State Highway (SH) 402	Not Significant
State Highway (SH) 470	Not Significant
<i>Total Number of Not Significant State Highways 74</i>	

**Appendix C. Colorado Historic Highways Inventory Forms  
(Organized Numerically by State Highway Number)**

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# **Colorado State Historic Highways Inventory**

## **National Register of Historic Places Significance Evaluations**

**Volume 2 of 2: Appendix C, State Highway  
95 through U.S. Highway 550**

Prepared for

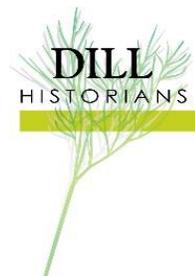
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and



November 2016