Draft NEPA Environmental Assessment of the Proposed Land Exchange for 6F Designation in Glenwood Springs, Colorado



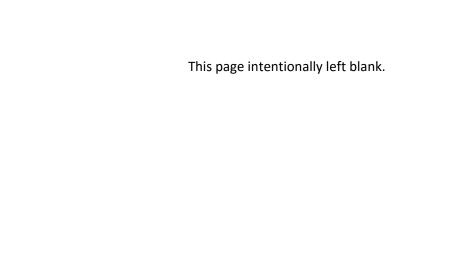
September 26, 2017

Prepared on Behalf of:

Roaring Fork School District RE-1

Sponsored By:

The City of Glenwood Springs



Draft NEPA Environmental Assessment of the Proposed Land Exchange for 6F Designation in Glenwood Springs, Colorado

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The Land and Water Conservation Fund (LWCF), Stateside Assistance grant program, provides funds to states, and through states to local agencies, for the acquisition and development of outdoor recreation resources. Lands that have received funding through LWCF are protected under Section 6(f)(3) of the Act unless a conversion is approved by the Secretary of the Interior as delegated to the National Park Service.



How to Read this EA

Chapter 1 of this document describes the background and history leading up to the proposed land conversion, and the purpose and need for this conversion. Chapter 2 describes the proposed action, alternative action, and other alternatives considered but dropped from further analysis. The text explains why the proposed action is the preferred option. Chapter 3 describes the environment, by resource type, in and around the proposed conversion and replacement areas. Chapter 4 evaluates and characterizes potential impacts to each of these resource types. Chapter 5 describes the consultation and coordination efforts of the agencies, groups, and individuals involved in the preparation of this EA, including public comments received. Chapter 6 lists all references used in the creation of the EA.

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Glossary of Terms

CoGS City of Glenwood Springs
CPW Colorado Parks & Wildlife

CEQ Council on Environmental Quality

D&RGW Denver and Rio Grande Western Railroad

EA Environmental Assessment

ESF Environmental Screening Form

FONSI Finding of No Significant Impact

GSES Glenwood Springs Elementary School

LWCF Land and Water Conservation Fund

NEPA National Environmental Policy Act

NPS National Park Service

NRHP National Register of Historic Places

OAHP Office of Archaeology and Historic Preservation

RFSD Roaring Fork School District RE-1

SCORP State Comprehensive Outdoor Recreation Plan

SHPO State Historical Preservation Office

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1.0 Background, Purpose and Need

1.1 Introduction and Background

In the 1950's the Roaring Fork School District RE-1 (RFSD) in Colorado acquired what is now Vogelaar Park, which is approximately 4.7 acres in size, and developed a portion of the park to recreation use. Federal funds from the Land and Water Conservation Fund (LWCF) and Colorado state grant money were used to make improvements to the park in 1980, thereby protecting this land for public outdoor recreation under Section 6(f)(3) of the LWCF Act (NPS 2014). The LWCF project number for the Vogelaar Park grant is 08-00887. In 2015 the CoGS and RFSD began negotiating land exchange options to build



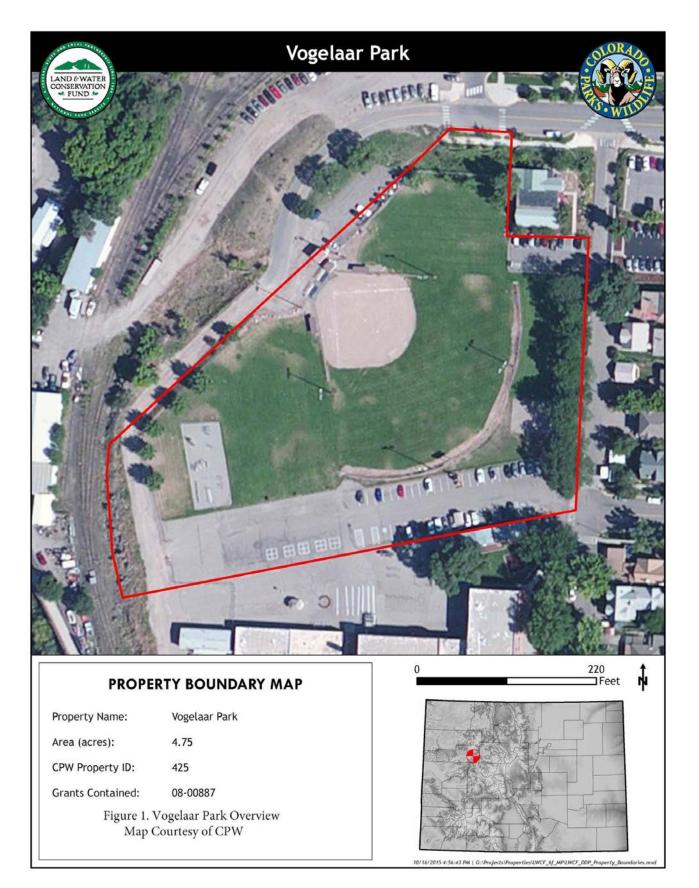
more youth soccer fields, allow the renovation of the GSES campus, and develop additional housing within the downtown area of Glenwood Springs. A view of Vogelaar Park looking southwest is included in **Photo 1** to the left.

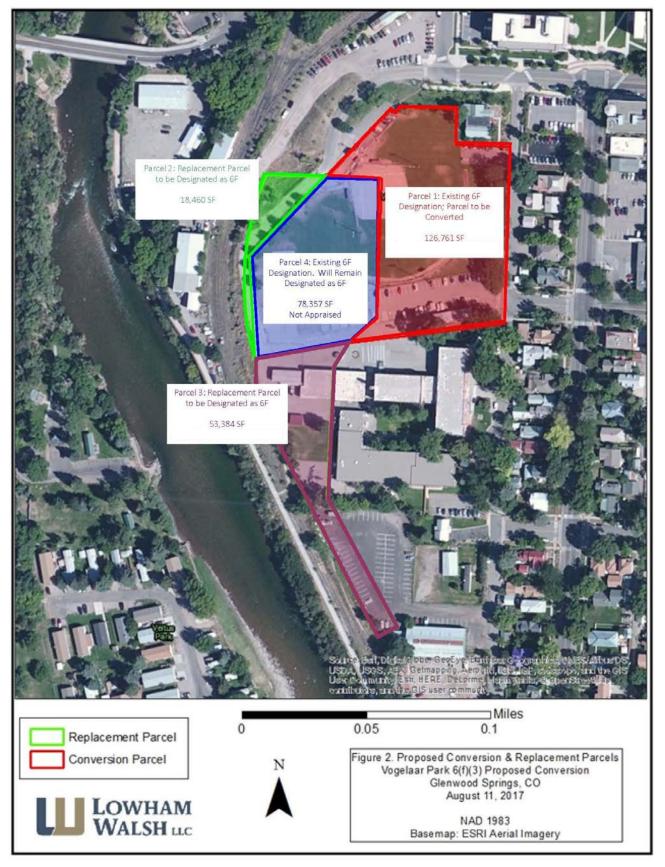
The CoGS and RFSD entered into an Intergovernmental Agreement in May 2016 whereby the CoGS will assume ownership of approximately half of the Vogelaar Park

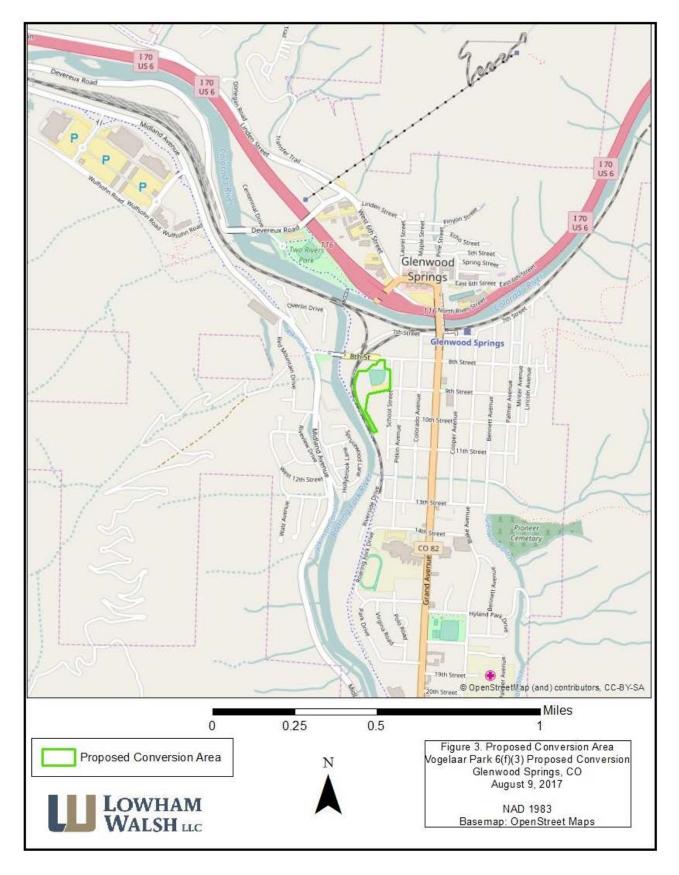
parcel, located between the school and the proposed Eighth Street extension, for possible future housing development. RFSD will retain the western portion of Vogelaar Park, and will take over ownership of two city-owned parcels located to the west and south of the existing Vogelaar Park. The newly configured Vogelaar Park will include development of regulation team-sports facilities including new soccer fields and other outdoor recreational areas for public use.

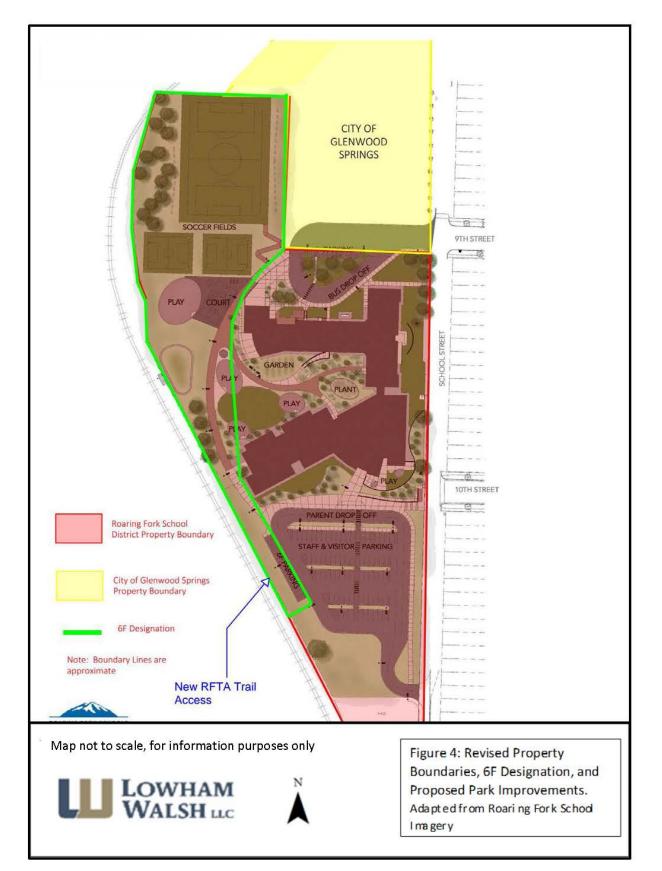
Section 6(f)(3) of the LWCF Act requires that protected park land that is converted to a use other than outdoor recreation must be replaced with property that is of at least equal fair market value and equivalent recreation utility as the property that is converted. The replacement property must constitute a viable recreation unit or be acquired as an addition to an existing recreation unit.

Development of the replacement property may be required to ensure that a similar level of recreation facilities are provided compared to what was lost at the converted site (NPS 2014). Figure 1 shows the Vogelaar Park parcel as it is currently configured. Figure 2 shows the four parcels involved in the conversion process. The red conversion parcel (Parcel 1) is currently protected by a 6F designation as part of Vogelaar Park. This parcel would be converted to other uses, as described in later sections below. The green and purple replacement parcels (Parcel 2 and Parcel 3 respectively) would be used to off-set the loss of parcel 1. The blue parcel (Parcel 4) currently has, and would maintain, its 6F designation as part of Vogelaar Park. Appraised values of these parcels are shown on Figure 4. Figure 3 shows the location of the proposed conversion and replacement areas in relation to the City of Glenwood Springs (CoGS). Figure 4 shows the proposed facilities and layout of the new Vogelaar Park property.









1.2 Purpose and Need

The purpose of this project is to remove federal protection from a portion of Vogelaar Park, approximately 2.91 acres in size, and designate exchange land owned by the CoGS for conversion in order to meet the 6(f)(3) requirement under the LWCF Act.

The need for the proposed action is to update Vogelaar Park to meet changing recreation interests of the community. As part of the park update, the conversion property will be used to (1) upgrade the GSES campus facilities to meet current and future educational needs, and (2) for CoGS to potentially develop needed additional residential housing.

The CoGS proposes to convert the Eastern portion of Vogelaar Park from recreational lands to development lands. RFSD will retain the Western portion of Vogelaar Park. An additional parcel will be added to the Western portion of Vogelaar Park, with this newly configured parcel being developed into youth soccer fields, playgrounds, basketball courts and other outdoor recreation uses.

This Environmental Assessment (EA) analyzes the Proposed Land Exchange and No-Action alternatives and their impacts on the environment. This EA has been prepared in accordance with the National Environmental Policy Act (NEPA) of 1969 and regulations of the Council on Environmental Quality (CEQ) (40 Code of Federal Regulations [CFR] 1508.9). This EA has been developed for the NPS to provide an understanding of all impacts regarding the relocation of Vogelaar Park and the associated 6(f) boundary will have on the public and surrounding environment.

2.0 Description of Proposed Action and Alternatives

The NEPA implementing regulations (40 CFR 1500-1508) require that a range of reasonable alternatives be evaluated including a No Action Alternative. Reasonable alternatives are any available alternatives that meet the project purpose and need. This chapter includes a description of the identified alternatives and why they were included or eliminated from further consideration.

2.1 Alternative 1: Proposed Conversion

The proposed conversion removes federal protection from a portion of the existing Vogelaar Park LWCF boundary and replaces it with parcels adjacent to the park. This alternative was selected in order to improve public recreational facilities and facilitate the renovation and expansion of the Glenwood Springs Elementary School campus. Proposed replacement land was located with the input from the RFSD and CoGS in locations suited to the City's recreational needs.

The existing 6(f) boundary at Vogelaar Park, which is managed by the COGS, consists of 4.7 acres including a baseball field, outdoor basketball courts, a playground, two playfield areas, and gravel parking areas.

The Proposed Action would convert approximately 2.91 acres of the total 4.71 acres of Vogelaar Park between the GSES campus and Eighth Street from recreational land use under Section 6(f)(3) of the LWCF to high density residential and commercial use. The remaining 1.79 acres of Vogelaar Park would remain in 6(f)(3) designation.

Further, to meet the requirements of Section 6(f)(3), RSFD would convert approximately 1.65 acres of

land adjacent to, and southwest of, the park to convert into recreation land as replacement for the lost acreage at Vogelaar Park. The 1.65 additional acres of replacement land are currently owned by the RFSD and border the western portion of Vogelaar Park, extending to the north, west, and south. The newly designated park lands and remaining portion of Vogelaar Park will serve as a single park area and will include three soccer fields, outdoor playground areas, basketball courts and turf areas. Additional parking will also be provided. The new park configuration will be fully contained within the 6(f) boundary, will be owned by RFSD, and will be jointly used for RSFD and CoGS recreational purposes. Based on an appraisal of all properties considered for replacement properties conducted in June 2017, the value of the conversion and replacement properties are equivalent although they are not the same size.

Pending NPS approval¹, the RFSD and CoGS will finalize the land exchange agreement. The RFSD and CoGS plan to have the revamped Vogelaar Park available for community use by end of the 2017-2018 school year.

2.2 Alternative 2: No Action

Under the No Action Alternative, there would be no change to Vogelaar Park. It would continue operating as a park providing the same services, while continuing to be managed under LWCF protected status. This alternative was not selected because the CoGS has found that there is an increasing demand for soccer and a decreasing demand for baseball fields (GRE Meeting Notes 2017). In addition, the new configuration would connect Vogelaar Park with the Rio Grande bike trail that follows the Roaring Fork River, thus connecting the park's service area with other parks in the city's system while expanding and improving play and field areas available for GSES and community use. Without the reconfiguration, according to CoGS meeting records, the GSES would not be able to expand its campus and the school would likely need to be rebuilt in an alternative location.

The area encompassing Vogelaar Park and the replacement land is included in "A Redevelopment Strategy for the Confluence Area, City of Glenwood Springs" (Redevelopment Strategy) produced in 2003 by Clarion Associates. The Confluence Plan was recently updated produced by Community Builders (2017) and still focuses on the goals outlined in the 2003 version. The "Vision" portion of the 2003 document stated that Confluence Area, which includes Vogelaar Park and lands to the north and adjacent to the Roaring Fork and Colorado Rivers, "currently includes a mix of challenging features, such as ... [the city recycling center] together with higher quality public uses, including ... an elementary school [GSES], [Vogelaar] park, and river corridor trail....". The Vision statement notes that "a key challenge of the redevelopment strategy is to implement the infrastructure improvements as financially and physically feasible over time while enhancing the future development opportunities for the available parcels to result in a cohesive and vital neighborhood adjacent to the downtown." Based on this guidance, the No Action Alternative does not address the CoGS's goal to provide a "cohesive and vital neighborhood adjacent to downtown". Further if the proposed plan to develop the north side of Vogelaar Park moved forward, the No Action alternative does not provide a replacement for the conversion of use of parklands, and the CoGS would not meet the 6(f)(3) requirements of the LWCF,

 $^{^{1}}$ This approval cannot take place without a document indicating that the proposed LWCF conversion is acceptable to the NPS

which would be in violation of federal law.

2.3 Other Alternatives Considered but Eliminated from Further Analysis

Various other parcels were considered for replacement properties but all were located on parcels that were separated and away from the remaining Vogelaar Park parcel. These proposed replacement parcels were not close to the city center and would not provide a direct replacement for lands removed from the centrally located Vogelaar Park. The three areas considered were (1) an existing park facility located approximately 1.5 road miles northwest of the current Vogelaar Park and across the Roaring Fork River (Community Center parcel), (2) a new park to be located near the high school approximately 1 road mile from Vogelaar Park (Klein/lone Pine Parcel), and (3) a parcel located along a narrow strip of land adjacent to the Roaring Fork River approximately 3/4 mile by road south of Vogelaar Park (Ballard/Newcomb Parcel). Because none of these parcels met the goal of providing additional parkland within the downtown residential and commercial area of Glenwood Springs, each of these alternatives was eliminated.

3.0 Affected Environment

According to the NPS Environmental Screening Form, the resources listed below would potentially be affected by the Proposed Action. This Chapter describes the existing characteristics of each resource within the proposed parcel conversion and the proposed purchase of replacement property (project area) that would be affected. Descriptions of potential environmental consequences to the parcels within the project area are described in Chapter 4.

3.1 Geologic Resources

The Glenwood Springs area offers a diverse array of geology in the region as a result of the deep cutting action of the Colorado River, Roaring Fork River, and several tributaries along with ancient glacial activity. It is located east of the Grand Hogback Monocline, south of the White River Plateau, west of the Park Range, and north of the Sawatch Range.

The mountains surrounding the area include Triassic age Chinle and State Bridge Formations that make up the red and orange siltstone and sandstone, Tertiary age basaltic flows and associated tuff, breccia, and conglomerate of late volcanic bimodal suite dating back 3.5 million year (MY) to 26 MY, modern alluvium from the Piney Creek Alluvium formation and younger deposits, and landslide deposits which include talus, glacier rock, and thick colluvial deposits.

Canyon bottoms are composed of Precambrian age Biotitic Gneiss, Schist, and Migmatite along with Granitic rocks of the 1.4 million year old age group overlain by Quaternary age ancient alluvium of varying ages along with gravels and alluviums of the Pinedale and Bull Lake age, the Eagle Valley Formation which includes siltstone, shale, and local gypsum and evaporitic facies of gypsum, siltstone, and shale, and the Maroon Formation consisting of arkosic sandstone, siltstone, conglomerate, and limestone.

While there are proven coal and gravel deposits in the vicinity of the properties of interest, these resources are not practicably mined in this vicinity of the CoGS. Therefore, there are no known significant and/or reasonably recoverable geologic resources at the conversion land or replacement property.

3.2 Air Quality

Principle sources of airborne emissions at Vogelaar Park and the adjacent replacement property are related to motor vehicle use on adjacent city streets and parking areas.

3.3 Noise

The main source of noise at Vogelaar Park and the adjacent replacement property is motor vehicle use on adjacent streets and people playing and recreating in Vogelaar Park. Proposed development activities would result in temporary noise generation.

3.4 Water Quality/Quantity and Stream Flow

Vogelaar Park and the adjacent replacement area are located on an elevated terrace above the Roaring Fork River. The site is flat with little to no slope. The Roaring Fork River has a daily flow of around 300 cubic feet per second (cfs) to around 4,000 cfs depending on season and snow pack. The Roaring Fork River is a regulated Gold Medal Water fishing habitat from the confluence of the Fryingpan to the confluence with the Colorado River. No surface waterbodies or commonly used drinking water aquifers exist within the boundaries of the conversion and replacement properties.

3.5 Floodplains and Wetlands

Vogelaar Park and the adjacent replacement area are located on an elevated terrace above the Roaring Fork River. Both sites are flat with little to no slope. Vogelaar Park and the adjacent replacement area lie within Zone C of the FEMA Floodplain Designations. Zone C is defined as areas of minimal flooding (FEMA 1985). No wetland features exist within the boundaries of the conversion and replacement areas.

3.6 Land Use and Planning

Vogelaar Park and the adjacent replacement area are both zoned as C/3 General Commercial (CoGS 2016), a commercial district intended for uses to which the public requires easy and frequent access.

Vogelaar Park is bounded by the GSES, commercial, and residential neighborhoods. The proposed replacement parcel is also bounded by the GSES, residential neighborhoods, the Rio Grande Trail – a rails to trails multiuse recreational trail that lies between the historic and unused Denver and Rio Grande Western Railroad (D&RGW) to the east and the Roaring Fork River to the west.

3.7 Circulation, Transportation, and Accessibility

Vehicular access to Vogelaar Park is provided by a parking area located on 8th Street, or a parking area at GSES along School Street. Pedestrian access to the site is from School Street, 8th Street, GSES, and from the Rio Grande Trail. Currently, traffic congestion is high along 9th and School Streets due to school loading and unloading from buses, staff vehicles, and parents dropping off children.

3.8 Wildlife Habitat and Biological Resources

No threatened, endangered, or special status fish, wildlife, or vegetation species were observed during field evaluation of the existing park and proposed conversion area. No habitats for these species were identified during field evaluation within the conversion area and the adjacent replacement area. The conversion and replacement areas are mostly manicured playfields comprised of vegetation including red fescue (*Festuca rubra*), Kentucky bluegrass (*Poa pratensis*), ryegrass (*Lolium perenne*), broadleaf plantain (*Plantago major*), white clover (*Trifolium repens*), and dandelion (*Taraxacum officinale*). Trees such as honey locust (Gleditsia triacanthos), American elm (*Ulmus americana*), silver maple (*Acer*

saccharinum), and chokecherry (*Prunus virginiana*) are growing around the edges of the properties. Some noxious weeds such as field bindweed (*Convolvulus arvensis*), small whitetop (*Cardaria draba*), and Dalmatian toadflax (*Linaria dalmatica*) were observed growing within and at the edges of the properties.

3.9 Recreation

The existing 6(f) boundary of Vogelaar Park consists of 4.7 acres and includes a baseball field, outdoor basketball courts, a playground, two small playfield areas, a concession building, a storage building, and concrete parking areas. The current Park parcel offers indirect but easy access to the Rio Grande Trail. The adjacent replacement area is separated from the Rio Grande Trail by the unused tracks of the historic D&RGW.

Vogelaar Park serves the city of Glenwood Springs, which has a population of approximately 9,610 people (2010 census). The park is used for baseball games, pick-up basketball, and non-organized play activities. Total per capita use of the park is not known.

3.10 Aesthetics

Vogelaar Park is located on an elevated terrace above the Roaring Fork River. The park is a flat lot that is bounded by 8th Street, School Street, GSES to the south. City and county buildings are located beyond 8th Street to the north or the park. A residential neighborhood is located beyond School Street to the east. A small open space, railroad tracks and a building owned by the Roaring Fork Transportation Authority (RFTA), which supports small commercial shops and an RFTA storage area, are located to the west of the park. The GSES campus is located to the south of the park.

The replacement parcels are bounded by open space to the north, by the remaining portion of Vogelaar Park and GSES on the east, and by the railroad, the Rio Grande Trail and Roaring Fork River to the west of the site.

3.11 Historical and Cultural Resources

The purpose of a cultural resource survey is to provide compliance under Section 106 of the National Historic Preservation Act (and its implementing regulations under 36 CFR Part 800) by undertaking a "reasonable and good faith" effort to identify historic properties (defined as listed in or eligible for listing in the National Register of Historic Places). Since the land exchange project would receive LWCF funding, the project constitutes an undertaking as defined under 36 CFR 800.3. Federal undertakings require consideration of effects on historic properties before a permit is issued. The NPS will be the lead federal agency reviewing the proposed project. Therefore, a Class I file search and a Class III cultural resource inventory of the proposed project area boundary were conducted in July of 2017.

A file and literature review was conducted using the online Compass database available from the Colorado Historical Society Office of Archaeology and Historic Preservation (OAHP) that included the extent of the project area boundary, which is defined as the limits of ground disturbance associated with the project parcels, plus a one mile buffer surrounding the project area boundary. Four previously documented cultural resources occur within or very near to the project area boundary. These consist of site 5GF3007, D&RGW features including a rock retaining wall and switching stands; site 5GF5021, the Freight Depot building for the D&RGW; and 5GF5123, the historic Glenwood Springs Elementary School.

In addition, a segment of the Denver and Rio Grande Western Railroad Aspen Branch Line, 5GF1661, is located immediately adjacent to the project parcel's western boundary. It is related to site 5GF3007 and is addressed in that site revisit documentation; but the rest of the segment was not revisited as it lies outside of the project area boundary. Sites 5GF3007 and 5GF5021 were revisited for the current project; site 5GF5123 could not be accessed due to active construction related to the school's renovation. The school was built in 1921 and the original building was an example of Late 19th and 20th Century Revival architecture. An official OAHP site form has never been completed for the school.

Four previous linear surveys intersect the project area, but only cover small portions of it. Therefore, a completely new survey was conducted. These previous projects include a survey for the planned TransColorado Gas Transmission Line by Alpine Archaeology in 1998 (OAHP# MC.LM.R139), Western Cultural Resource Management's survey for the Roaring Fork Railroad Authority Environmental Impact Statement along the Glenwood Springs to Brush Creek Transportation Corridor in 2000 (OAHP# MC.CH.R94), a survey of the Glenwood Springs Inceptor Sewer by Cultural Resource Consultants for the Environmental Protection Agency in 1978 (OAHP# GF.EP.NR1), and the survey of the Glenwood Springs Alternative Transportation Route for the Colorado Department of Highways by Metcalf Archaeological Consultants, Inc. in 1993 (OAHP# GF.CH.R5).

On July 18, 2017, a Class III cultural resource inventory was conducted on the portions of the project area boundary not included in the construction fencing around the GSES renovation project. Inventory was conducted with pedestrian transects spaced no more than 20 meters apart, per State of Colorado guidelines. The inventory resulted in no new historic or prehistoric cultural resources. Previously recorded site 5GF5021, the D&RGW Railroad Freight Depot building, was revisited because its plotted location in OAHP records is touching the northern end of the project area. However, this site was found to be located well outside of the project area boundary, across 8th street and an adjacent parking lot. The site is field recommended eligible to the National Register of Historic Places (NRHP) and as contributing to the historic district of Glenwood Springs. Site 5GF5021 will not be affected by the undertaking. Previously recorded site 5GF3007, which consists of features associated with the D&RGW Railroad, was also revisited because it is located along the western edge of the project area. No changes were made to this site's documentation. Site 5GF3007 is field recommended eligible to the NRHP and as supporting the eligibility of the entire historic D&RGW Railway, 5GF1661. This site is within the project area boundary; specifically within the parcel designated for open/recreational space. It appears, however, to be outside of anticipated construction because of its location below a steep embankment. Lastly, site 5GF5123, the historic Glenwood Springs Elementary School, was currently being renovated at the time of the cultural resources inventory, and could not be revisited.

In summary, known cultural resources within the project area and immediately surrounding it are primarily related to the built or engineered environment and include historic buildings within the town of Glenwood Springs. Prehistoric archaeological sites are not known to exist within or nearby the project area, but the close proximity to water (both the Roaring Fork and Colorado Rivers) would have offered a good location for habitation in the past. The modern built environment of the parcels is a limiting factor for the discovery of intact historic and prehistoric resources. Although there is potential for soil depth in the alluvial deposits in the project area, there is little potential for significant buried cultural deposits of Holocene age. Regardless, construction within the project area boundaries could potentially affect unknown cultural resources including historic deposits associated with the Glenwood

Springs Elementary School (5GF5123).

3.12 Socioeconomics and Minority/Low Income Populations

Glenwood Springs had an estimated civilian working population of 5,877 and an estimated total population of 10,229 in 2016, according to the *Parks and Recreation Plan Master Update* (Greenplay 2016). Median household income in 2016 was \$57,415 compared to \$60,903 in all of Colorado. Median price of detached houses was \$385,570, according to the *Parks and Recreation Plan Master Update* (Greenplay 2016). Overall racial/ethnic diversity is on the rise, with approximately 80% reporting as "Caucasian" and 33% reporting as "Hispanic origin" in 2016. Income distribution near the median level is divided roughly equally between reporting races/ethnicities. The median age in Glenwood Springs is 35.5, slightly lower than the median age for Colorado. Projected annual population growth rate is expected to be close to one percent through 2021. Overall, Glenwood Springs matches Colorado on percentage of people with higher education, although those with less than a high school education is larger (14.7%) in Glenwood Springs than in Colorado in general (9.4%) (Greenplay 2016). The majority of the population lives within center of Glenwood Springs, with the outskirts composed of commercial development and smaller neighborhoods (US Census Bureau 2010, updated to 2016). Vogelaar Park and the adjacent replacement area are both located near the center of Glenwood Springs.

4.0 Environmental Consequences

The Environmental Consequences section provides an evaluation of any short- or long-term impacts on the resources of concern. When possible, quantitative information is provided in each section to support the impact determination.

Impacts can be either adverse or beneficial; to avoid confusion, they are defined as "adverse impacts" or "beneficial effects" in this analysis. Adverse impacts could result from management actions that diminish any of the resource values described in the analysis. Beneficial effects could result from management actions that maintain or enhance any of the resource values described in the analysis. The intensities of impacts are also described, where possible, using the following definitions:

- Negligible: The impact or effect is at the lower level of detection; there would be no measurable change.
- Minor: The impact or effect is slight but detectable; there would be a small change.
- Moderate: The impact or effect is readily apparent; there would be a measurable change.
- Major: The impact or effect is severe, highly noticeable, and potentially permanent.

4.1 Geologic Resources

No measurable effects to geologic resources are expected as a result of the proposed land conversion or acquisition of a replacement property.

4.2 Air Quality

No measurable effects to air quality are expected as a result of the proposed land conversion or acquisition of a replacement property.

4.3 Noise

No measurable changes to existing or expected noise levels are anticipated as a result of the proposed

land conversion or acquisition of a replacement property. No effects to noise levels are expected due to the conversion.

4.4 Water Quality/Quantity and Stream Flow

Any construction activities on the conversion or replacement properties would be required to meet State of Colorado storm water regulations. No measurable effects to water quality or stream flow are expected as a result of the proposed land conversion or acquisition of replacement property.

4.5 Floodplains and Wetlands

No measurable effects to floodplains or wetlands are expected at the conversion and replacement properties.

4.6 Land Use and Planning

If the conversion and replacement takes place, the remaining portion of Vogelaar Park would support three soccer fields. The newly acquired replacement land located to the south and west of the GSES would be converted to parkland containing a basketball court, a children's play area, and other recreational features (Figure 4). The construction of high-demand playing fields and open space would be a beneficial effect to the community's ability to utilize this land for recreation. Potential impacts of the loss of a portion of Vogelaar Park and the baseball diamond there would be mitigated by addition of new playing fields that are in higher demand than the current baseball diamond, and development of additional parklands on the replacement property that directly abuts the Rio Grande trail.

Land surrounding the conversion site, proposed for use as a residential area, is bounded by existing residential neighborhoods. Minor negative impacts to adjacent residential land use are anticipated as a result of the proposed land conversion and replacement; these effects can be mitigated by the addition of replacement lands to Vogelaar Park, architectural planning, public input opportunities, and adherence to the 2017 Confluence Plan Update and other CoGS planning documents that direct the CoGS in its urban development.

4.7 Circulation, Transportation, and Accessibility

If the conversion takes place, park access will be provided at GSES and at an enlarged and improved parking area located to the south of the school. In anticipation of the conversion and replacement project, city officials and RFSD have re-routed school traffic to 11th Street and provided a school bus turnaround. This will allow direct and safer access to GSES and decrease traffic congestion in and out of the school and playing fields at 9th Street. Pedestrian access would be maintained via the Rio Grande trail and sidewalks along School Street and 8th Street and from GSES. Decreased congestion at 9th and School Streets is anticipated due to school traffic re-route to 11th Street. An expected net beneficial effect to circulation, transportation, and accessibility is anticipated from the proposed 6(f) conversion, with adverse impacts being negligible.

4.8 Wildlife Habitat and Biological Resources

The species observed within Vogelaar Park and proposed conversion area are species commonly seen in urban lands of the Rocky Mountains. The lack of TES species and their specialized habitats is to be expected in an area such as the CoGS. The conversion of a portion of Vogelaar Park to housing units and the addition of replacement property to offset this change is unlikely to cause measurable changes to

area vegetation, wildlife habitat and biological resources. No impacts to wildlife habitat and biological resources are anticipated.

4.9 Recreation

The Colorado State Comprehensive Outdoor Recreation Plan (SCORP) priorities include providing Colorado recreationists with more outdoor educational opportunities, integrating outdoor recreation interests, maintaining healthy lifestyles and communities, and providing stewardship of outdoor recreation including funding and financial sustainability.

The 6(f) replacement land proposed to offset loss of recreation lands at Vogelaar Park is located to provide equivalent access to recreation opportunities in populated areas of the city (Figure 4). The proposed replacement land will contain three youth soccer fields, a playground, playfields, and a basketball court. The replacement area is located adjacent to the existing Vogelaar Park baseball field, the GSES, Rio Grande Trail and the Roaring Fork River. The converted portion of Vogelaar Park is proposed to be utilized for new residential housing, which is a planning priority within the CoGS. An expected net beneficial effect to recreation resources is anticipated from the proposed 6(f) conversion due to the upgrades to athletic fields, with adverse impacts being negligible.

4.10 Aesthetics

The area encompassing Vogelaar Park and the replacement land is included in the Redevelopment Strategy documents of 2003 and 2017 (Clarion Associates 2003, Community Builders 2017). Based on documented efforts by the CoGS to maintain a "cohesive and vital neighborhood" (Clarion Associates 2003) within city limits, effects of the 6(f) conversion are expected to have, overall, no adverse impacts to aesthetics.

4.11 Historical and Cultural Resources

No known cultural or archaeological site are located within the subject area that will be affected by the land exchange. Various historical structures including Glenwood Springs Elementary School and railroad features are located around the area of interest and are not anticipated to be affected by the project. In addition, the CoGS and RFSD is required to consider effects on cultural resources during local ordinance and zoning review. In the event of an archaeological discovery during any phase of construction, or a more recent historical find (e.g. artifacts, housing sites), the project proponents would contact the State Historical Preservation Officer for consultation on further work that may be necessary. Impacts to historic or cultural resources are expected to be negligible to minor.

4.12 Minority/Low Income Populations

The proposal for the conversion of Vogelaar Park and acquisition of an adjacent parcel will provide opportunities for popular team recreation activities such as soccer and basketball, and other casual recreation activities such as picnicking. These activities were noted as high-priority in the Glenwood Springs, Colorado Parks and Recreation Master Plan Update (2016). The housing proposed for construction on converted land has been considered for inclusion of some limited income and/or teacher housing (Post Independent 2016). Development of the CoGS, as stated in the Redevelopment Strategy (2003), should "result in a cohesive and vital neighborhood adjacent to the downtown." The proposed conversion and replacement project is expected to achieve this goal, and is proposed to include opportunities for low income housing. The park currently is and would remain fee-free and thus

does not impose an economic barrier to its use. An expected net beneficial effect to socioeconomics and minority/low income populations would be expected from the proposed 6(f) conversion, with adverse impacts being negligible.

5.0 Consultation and Coordination

5.1 Agencies and Personnel Consulted

The following agency personnel were consulted during the preparation of this document:
Kelly Pearce – NPS WCF Colorado
Roger Knowlton – Chief of WCF NPS
Scott Blackburn – Office of Planning and Compliance at NPS
Megan Barton – Non-motorized Trails Grant Administrator, CPW
Jeff Gatlin – RFSD
Shannon Pelland – RFSD
Terri Patch – CoGS
Desi Navarro – Senior Project Manager, NV5

There are no Threatened and Endangered Species expected in the project area; therefore §7 consultation with the USFWS is not required.

5.2 Public Involvement

The Environmental Assessment will be released for a 30 day comment period commencing when the draft EA is submitted to CPW for review. The public will be able to review the draft EA by accessing it on the CoGS' website or via hard copies that will be placed in the Glenwood Springs City Offices and the Roaring Fork School District office within three days of submitting the conversion package to CPW for review. The hard copy documents will be available for review for the duration of the comment period.

The public will be alerted to the opportunity to comment via the COGS website and the *Post Independent* newspaper. Comments will be collected via the website and by mail sent to the COGS offices. All public comments posted within 30 days of first publication will be reviewed and considered in the final EA and will be included in the appendix of the final EA.

Public input for proposed changes to Vogelaar Park have been gathered since the early 2000s, when this information gathered was presented in the 2003 Confluence Plan. In addition to consideration at City Council and School Board meetings, a new effort to move forward with the Confluence Plan has been in progress since 2013 (COGS 2017). To assure that the plan represented community goals, the main author of the 2017 plan, Community Builders, held meetings and workshops to facilitate stakeholder and community involvement. A goal-setting workshop was held to identify the public's vision and top priorities for redevelopment of the Confluence. A three-day urban design charrette engaged community members and stakeholders in exploring design concepts for redevelopment of the Confluence. Top design concepts were presented to stakeholder groups to solicit feedback, which was integrated into a final design workshop where development options were further refined. A Project Advisory Team (PAT) was established to guide the planning process for the Confluence Redevelopment Plan. The PAT included representatives from the Downtown Development Authority (DDA), the City of Glenwood Springs, City Council, the Planning and Zoning (PZ) Commission, the River Commission, the Transportation Commission, and the Roaring Fork Transportation (RFTA) Commission. Identified goals included in the 2017 plan include creating community spaces, encouraging use of the downtown area,

and providing walkable, bikeable connections within the City. In 2015, COGS voters approved the land exchange necessary to facilitate the 6F conversion.

5.3 List of Preparers

Faron Compton – Project Manager, Grande River Environmental, LLC Colby Koerner – Project Manager, Grande River Environmental, LLC Matt Church – Ecologist, Lowham Walsh Engineering and Environmental Marit Sawyer – Senior Scientist, Lowham Walsh Engineering and Environmental Melissa Elkins – Project Manager, Metcalf Archaeological Consultants, Inc.

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