



COLORADO
Department of Transportation

Region 4

Director's Office
10601 10th Street
Greeley, CO 80634

November 18, 2021

Boulder Rotary Club
ATTN: Nine Mile Corner Working Group
P. O. Box 17635
Boulder, CO 80308

Re: After the Fact Post-Project Determinations of State Register Act Eligibility and Effect Determinations for Intersection Improvements at State Highway 7 (Arapahoe Road) and U.S. Highway 287 in Boulder County

Dear Boulder Rotary Club:

The Colorado Department of Transportation (CDOT) invites your comments regarding the above-referenced intersection improvement project in Boulder County, Colorado, in particular the project's impacts upon historical resources. This letter and the enclosed attachments are being sent concurrently to the Colorado State Historic Preservation Officer (SHPO) as well as a number of organizations that have an interest in historic preservation in Boulder County.

We are reaching out to you as part of CDOT's post-project or "after the fact" consultation with your office regarding a recently completed developer-driven intersection improvement project in unincorporated Boulder County, which necessitated temporary construction access within the CDOT-owned right-of-way (ROW) for Arapahoe Road/State Highway 7 (Arapahoe Road). While not a CDOT designed or constructed project, CDOT was involved by issuing a temporary access permit to the developer. Due to an oversight by CDOT Region 4, the presence of a previously recorded historical resource in the project area was overlooked, and the permit was issued. The intersection project was completed in Fall 2021. In order to achieve compliance with the Colorado State Register Act, CDOT is seeking your concurrence on after-the-fact determinations of State Register of Historic Places-eligibility for all historical resources (generally ≥ 50 year old), and effects to these resources from the intersection project. Since CDOT's only involvement in this project was to issue an access permit to the developers, there was no federal nexus that would have triggered the need for compliance with Section 106 of the National Historic Preservation Act (NHPA).

Background

In early July 2021, the (west side of) US 287/Arapahoe (SH 7) intersection project was brought to the attention of the CDOT Region 4 Senior Historian by a private citizen and Boulder Rotary Club member, William D. Meyer, who along with a small cadre of club members formed the Nine Mile Corner Monument Working Group (Working Group). This group is and has been concerned about the condition and preservation of the stone pillars that flank Arapahoe Road on the west side of the US 287. They were conceived as memorial monuments to American dead in the "Great War" (World War I). Constructed of sandstone in 1928 by the Boulder Lions Club, these intricate structures were major features of an elaborate gateway to a proposed - but never constructed - "Road of Remembrance" leading to Boulder. A detailed history of the pillars is presented in the attached document prepared by Mr. Meyer of the Working Group.

The 93-year-old gateway pillars have faced threats to their preservation since the early 1980s. The first threat came in 1983, when the Colorado Highway Department improved and widened Arapahoe Road at and near the intersection with and the west side of US 287. The project included the relocation of the northern gateway pillar forty feet to the north, and a specialized contractor was employed to move the structure intact. Unfortunately, the effort was unsuccessful due to unstable sandy soil which caused

the pillar to tumble to the ground and break apart. The Highway Department, with specialized contractor help, faithfully reconstructed the pillar in the new location, forty feet north of its original location. The southern pillar was left in place at its original (1928) location.

In the summer of 2017, the Evergreen Development Company was pursuing construction of a large commercial development on the southwest side of the intersection. In order to accommodate a new right turn lane from eastbound SH 7 to US southbound 287, Evergreen sought approval from CDOT to relocate the south pillar out of CDOT ROW for Arapahoe Road/SH 7 and onto the developer's parcel. The CDOT Region 4 Senior Historian advised CDOT's Permits unit that, as a significant historic resource, CDOT could not allow relocating the pillar outside CDOT ROW and incorporated into a private development. The pillars' locations comprise an especially important aspect of integrity, because they were deliberately sited in 1928 to prominently define the entrance to Arapahoe Road, which was being promoted as an important route to Boulder.

Faced with the permit denial, the developers and their design consultants altered the intersection improvement project to allow for preservation in place of the southern pillar, by surrounding it with a raised and landscaped "pork chop" island (equipped with guardrail) located between a new, separated right turn lane, and Arapahoe Road.

In the recent past, CDOT's Boulder Engineer Residency discussed the idea of potentially relocating both pillars out of the Arapahoe Road ROW and place them at a future nearby planned Bus Rapid Transit (BRT) stop on Arapahoe to in order create a "sense of place" for them; however, that idea ultimately was abandoned.

Project Description

This developer-driven project involved improvement of the west side intersection of Arapahoe Road and US 287 in Boulder County, to provide new curved, single-lane right-in and right-out turn lanes from Arapahoe Road onto US 287 and vice versa, that would accommodate an anticipated large increase in traffic. In order to preserve the southern pillar, as required by CDOT, a "pork chop" island was built around it, separating the SH 7 roadway and the new right turn lane onto southbound US 287. The reconstructed northern pillar was not touched by the project, and has been protected from damage by a chain link fence (see enclosed 2021 inventory form prepared by CDOT). This fence was likely installed by the contractor involved in constructing the intersection improvements. Plans prepared for the recently completed intersection improvement project are enclosed for your reference.

Determinations of Eligibility and Effects

5BL.432 - Arapahoe Road gateway pillars:

This resource consists of two (north and south) elaborately designed and built mortared stone masonry towers or pillars flanking Arapahoe Road/SH 7 near its intersection with the west side of US 287. The pillars were envisioned and constructed as memorials to World War I American war dead, and as part of an elaborate gateway to a proposed "Road of Remembrance." The pillars are approximately 20 feet tall and are constructed of locally-quarried sandstone to intentionally replicate the appearance and general character of architecture on the University of Colorado in Boulder. Both structures are identical in design, and each has a small door leading to a small internal chamber. A cornerstone is placed at the base of the south pillar (only), while the north pillar bears a bronze dedicatory plaque. Detailed descriptions and photographs of the pillars are presented in the enclosed inventory form, and their history is explained in great detail in the enclosed document prepared by William Meyer.

Eligibility: The pillars were originally inventoried as the "Road to Remembrance Gateway" in May 1980 by Manuel M. Weiss of the Boulder County Historical Society, as part of the Boulder County Historical Site Survey, Boulder and Broomfield Counties (Report No. MC.LG.R20). Weiss prepared a Colorado Historical Society Inventory Record, and evaluated the gateway pillars as eligible for the National Register of Historic Places (NRHP). The resource has a "field eligible" determination date of May 1, 1980.

CDOT revisited, rerecorded and reevaluated the site in the summer of 2021. The reevaluation effort benefited immensely from the extensive research and detailed narrative report by the Nine Mile Corner Monument Working Group of the Boulder Rotary Club, including Mr. William Meyer, about the history of what was historically known as Nine Mile Corner (the US 287 and Arapahoe Road intersection), including the gateway pillars. They are the only remnants of the 1928 war memorial gateway that formerly included a small park with a captured German artillery piece and flagpole. Based upon an abundance of information, CDOT finds that the memorial pillars meet the eligibility criteria of the State Register of Historic Places. The site is historically significant under Criterion A for its association with a widespread movement in the 1920s led by fraternal organizations and philanthropic clubs to install public memorials to honor fallen American soldiers from the First World War. Under Criterion C, the pillars are significant for their intricate, collegiate architecture-inspired design and elaborate stonework construction.

Effect: The integrity of the pillars (5BL.432) has been greatly impacted by both the 1983 and 2021 intersection improvement projects. The 1983 Highway Department project resulted in the accidental destruction of the north pillar, and while the rebuilt structure retains the same characteristics and appearance as the intact southern pillar, it is located 40 feet north of its original location, but still closely flanking a widened Arapahoe road.

The 2021 intersection project left the southern pillar in its original location, but constructed a raised “pork chop” traffic island around it. Instead of flanking the highway, the pillar now sits between the roadway of Arapahoe Road and a new curving single-lane right turn lane that that routes traffic behind the pillar - essentially destroying the spatial relationship of the south pillar and roadway. With the new improvements the south pillar no longer appears to be part of a gateway that westbound traffic on Arapahoe Road would pass through. The visual impact of these changes is severe, as the pillar no longer visually reveals its historic gateway function, and instead looks oddly out of place on the traffic island (with guardrail added).

The integrity of the pillars has also been impacted by the 40 ft relocation of the north pillar in 1983. Due to severe loss of integrity of the historic setting, CDOT has determined that the developer-driven Arapahoe Road and US 287 intersection improvement project has resulted in an *adverse effect* to 5BL.432, the Arapahoe Road gateway pillars.

5BL.11936 - State Highway 7 in Boulder County (5BL.11936)

Eligibility: Based upon the 2016 CDOT-sponsored Colorado Historic Highways Inventory by consultant Mead & Hunt, State Highway 7 was determined to be officially eligible for inclusion in the NRHP.

Effect: The project involves the Arapahoe Road/US 287 west side intersection which in the late 1920s was improved in conjunction with plans to promote Arapahoe Road as a major route to Boulder and draw more traffic to the city. The entrance to this route was designed to capture the attention of motorists and serve as a World War I memorial. Imposing tall stone pillars were erected flanking the road, and a tiny park with a WW I German trophy cannon and a flagpole was established in the space between the “wye” design of the intersection. The intersection improvements provided for two, two-way sweeping curves that funneled westbound traffic from the Lincoln Highway/US 287 past the flag and cannon, and through the narrow gap between the pillars. For eastbound traffic on Arapahoe Road, the pillars appeared as a gate on the horizon, with a cannon and flagpole strikingly centered between them. As the eastbound drivers passed between the pillars, they took one of the sweeping curves right or left to the Lincoln Highway.

Subsequently, in 1983, the Colorado Highway Department (now CDOT) redesigned and constructed the intersection to make it safer and accommodate a higher volume of traffic using both Arapahoe Road and US 287. At that time the road was widened to the north, requiring relocation of the northern gateway pillar. New turn lanes were constructed, the small war memorial park was removed, and the overall cross-section of Arapahoe Road of a short stretch of Arapahoe was widened and upgraded. The recently completed 2021 developer-driven project again redesigned the intersection, removing the 1983 intersection improvements and constructing new dedicated right-in and right-out turn lanes. The new

eastbound Arapahoe Road to southbound US 287 turn lane required the use of more land on the south side of Arapahoe within CDOT-owned ROW for Arapahoe Road. In order to preserve the south pillar within CDOT-owned ROW for Arapahoe Road, it was left in place but surrounded by a raised irregular-shaped traffic island, and the eastbound turn lane now passes behind the pillar - resulting in a major, but localized change to Arapahoe Road. The 2021 configuration is markedly different than the original 1928 design. Westbound traffic now is routed between the pillars, not on a sweeping arc but instead on a single straight lane of multi-lane highway. The curves and park are long gone, and the pillars are spread nearly twice as far apart as the original designers intended.

For eastbound traffic on Arapahoe Road, the right turn lane built in 1983 has been converted to an additional thru lane, with both thru lanes passing between the widened space between the pillars. A third lane - a new right turn lane - has been added to the south of the south pillar, so that this pillar now appears to approaching eastbound traffic as directly in the middle of Arapahoe Road.

Both the 1983 and 2021 intersection improvement projects substantially altered the alignment and width of Arapahoe Road at the intersection and extending west for approximately 510 feet (~1/10 mile) to accommodate the new turn lanes. A taper from the pre-existing roadway extends approximately 160 feet eastward from the project's western terminus, and the footprint gradually widens as the new right turn lane diverges away from the road's main thru lanes. The redesigned and constructed intersection does not bear any resemblance to the 1928 design. While the 1928 intersection has been severely altered and has lost most aspects of its historic integrity, the changes involve a very short portion of Arapahoe Road and does not substantially reduce the integrity of the entire route of Arapahoe Road/SH 7. Therefore, CDOT finds that the 2021 project resulted in a finding of *no adverse effect* with respect to this linear historic resource.

Proposed Mitigation

In order to mitigate the adverse effect to 5BL.432, the Arapahoe Road gateway pillars, CDOT proposes to engage with a number of stakeholders/interested parties and historic preservation agencies to cooperatively develop a plan for their preservation, monitoring and perpetual maintenance. Public access and interpretation will also be considered. CDOT will invite consulting parties to participate in a Mitigation Working Group. The Mitigation Working Group will hold meetings to discuss and develop a historic preservation plan based on the analysis of all possible preservation alternatives including the potential relocation of one or both of the pillars. CDOT will manage this effort.

Mitigation Working Group members would include the Boulder Rotary Club's Nine Mile Corner Monument Working Group, including Mr. William Meyer, who first brought this situation to our attention. Other invitees include governmental and non-governmental organizations, including the Boulder County Commissioners, the Boulder County Historic Preservation Advisory Board, the Lafayette Historic Preservation Board and the Town of Erie Historic Preservation Advisory Board. Other groups that may potentially join the working group include organizations such as the Boulder Historical Society, Historic Boulder, Inc., the Erie Historical Society and the Lafayette Historical Society. Veterans' organizations would also be invited, including American Legion Post 10 (Boulder) and Veterans of Foreign Wars (VFW) Post 1771 (Lafayette).

The working group will strive to come to a consensus regarding a preferred preservation approach for the pillars; however, if consensus is not achievable, CDOT will make a decision about the appropriate course of action based on the various alternatives considered by the Working Group. Cost estimates will be obtained for each alternative, and potential funding sources will be identified. At the culmination of the process of identifying and analyzing long-term preservation alternatives, the group will create a plan document to guide future actions. The preservation plan will be the end product that satisfies mitigation of the adverse effect to the stone pillars. The plan will provide a blueprint for preservation of the pillars, but would not include actual implementation of any restoration, maintenance work, or relocation. In terms of potential relocation, CDOT will include a plan element requiring creation of a detailed photographic record as well as detailed elevation drawings should relocation be the preferred alternative. Since the pillars remain in the Arapahoe Road ROW and therefore are owned by CDOT, the execution of the preservation plan will require close coordination with CDOT, and especially with the

CDOT Region 4 Senior Historian. We welcome your thoughts about our proposed mitigation, which we believe will facilitate preservation of this historically and architecturally significant resource.

We welcome your review of our historical resource determinations and of the proposed mitigation. If you have any questions or require additional information, please contact CDOT Region 4 Historian Jason Marmor at (970) 219-9155 or jason.marmor@state.co.us.

Sincerely,

James Eussen

James Eussen
Region 4 Planning and Environmental Unit Manager

Enclosures:

- CDOT-prepared OAHP Inventory form for 5BL.432 with attachments
- 1980 inventory form for 5BL.432
- Draft "Nine Mile Corner Monument" report by William Meyer
- Plan sheets for 2021 intersection improvement project
- Right-of-Way plan sheets for 1983 intersection improvement project

Cc: Vanessa Santisteven