



February 29, 2024

Colorado Department of Transportation  
10601 10<sup>th</sup> St.  
Greeley, CO 80308  
Attn: James Eussen  
Region 4 Planning and Environmental Unit Manager

State Historic Preservation Office  
1200 Broadway  
Denver, CO 80203  
Attn: Mitchell Schaefer  
Section 106 Compliance Manager

**Re: Mitigation Working Group Report and Revised Recommendation for After-the-Fact Mitigation Plan for Preservation of the Road of Remembrance Gateway Memorial**

Dear Messrs. Eussen and Schaefer:

As outlined in our letter dated February 14, 2023, a Mitigation Working Group composed of various local civic, veterans, and historic preservation groups has been developing a mitigation plan for the preservation, monitoring, and perpetual maintenance of the Road of Remembrance Gateway Monument (“the Monument”) at the intersection of State Highway 7 and US Highway 287 in Boulder County (“the Intersection”). In that letter, we recommended that the two stone pillars comprising the Monument should be relocated to a small area to be redeveloped approximately 150’ north-northeast of their current location, on the NW corner of the Intersection. Both CDOT and SHPO accepted that recommendation.

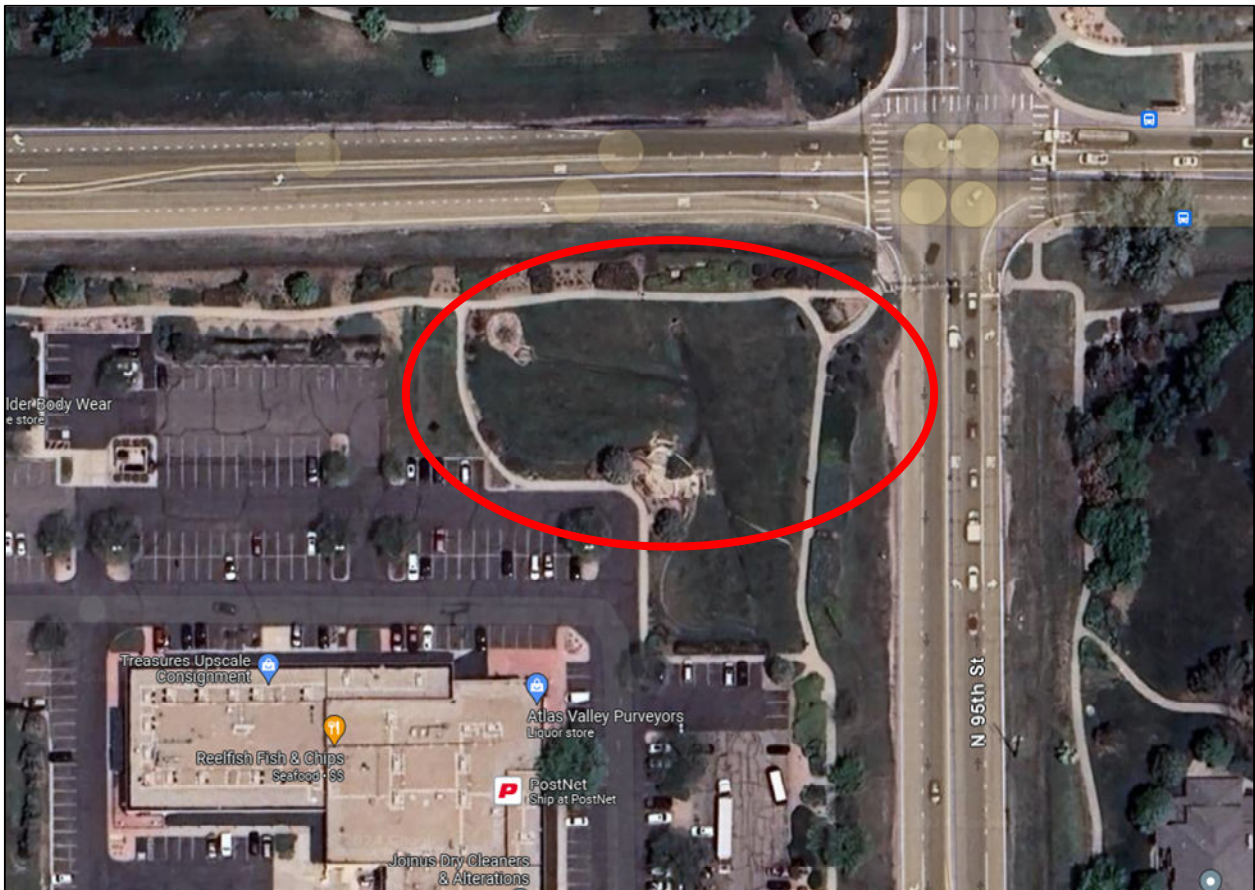
Unfortunately, after several months of work, the owners of the land for the proposed relocation site advised us that they did not want to participate in the project. The Working Group accordingly reopened the search process, and began reviewing additional potential relocation sites.

Our earlier community meetings made it clear that the public strongly favored relocating the Monument along State Highway 7 (aka Arapahoe Road), which originally was to be developed as the “Road of Remembrance.” The Working Group accordingly limited its search to potential sites adjacent to State Highway 7. In addition, at the suggestion of CDOT personnel and other professionals, the Working Group developed a matrix to evaluate and “score” each of those sites based on a variety of relevant factors. That process was completed earlier this month.

Based on this work, members of the Working Group met on February 21, 2024, and reached the following consensus recommendation concerning a mitigation plan.

### SUMMARY

The Working Group recommends that in order to mitigate the impacts identified in the CDOT Cultural Resource Survey 5BL.432 dated October 7, 2021 (“the Survey”), the two stone pillars comprising the Monument should be relocated to the SW corner of the intersection of 95<sup>th</sup> Street and State Highway 7 in Lafayette, on a parcel to be subdivided from the Atlas Valley Shopping Center. As discussed below, the stone pillars would be re-erected side-by-side facing northeast toward the intersection, and the new site would be developed and landscaped to incorporate a number of the historic design elements from the original Gateway site.



*SW Corner of the intersection of 95<sup>th</sup> Street and State Highway 7*

If it is determined that this site is not viable, the Working Group recommends that further efforts be made to determine the feasibility of relocating the Monument to (a) a site on the Teller Farms Open Space along State Highway 7 between 75<sup>th</sup> and 95<sup>th</sup> Streets, or (b) the NE corner of the intersection of State Highway 7 and US Highway 287.

## **BACKGROUND**

Much of the background to the current situation with the Monument was outlined in detail in the Survey, its attachments, and our letter of February 14, 2023, and will not be repeated. In brief, the current situation arose when a developer, Evergreen-287 & Arapahoe, LLC (“Evergreen Devco”), operating under the aegis of the Town of Erie Urban Renewal Authority, obtained a permit from CDOT to reconfigure the Intersection. Evergreen Devco ultimately constructed a right turn lane south of the south pillar of the Monument to provide space for an additional traffic lane between the pillars. To create traffic separation and facilitate drainage on that portion of the roadway, a large “pork chop” traffic island was constructed surrounding the south pillar which required raising the grade surrounding the south pillar by roughly 2 feet.

As CDOT later found in its Survey, this new design (a) substantially diminished the physical integrity of the Monument, (b) greatly impacted the integrity of the Monument’s historic setting, and (c) added a new and serious vehicular hazard. Moreover, as subsequently became apparent, by raising the grade on the “pork chop” island, the bottom portion of the south pillar – including the cornerstone and door – was buried in 2’ of dirt.

The Working Group, as part of its earlier work, determined that these impacts were unacceptable and would eventually result in the destruction of the Monument. The Working Group also concluded that there was no feasible engineering solution – short of completely rebuilding the Intersection – for mitigating these impacts while still leaving the Monument in its current location. For these reasons, the Working Group determined that the Monument must be relocated, repaired, and restored.

## **RECOMMENDED RELOCATION PLAN**

The current recommendation is the result of months of investigation and discussion. No viable site could be identified in the immediate vicinity of the Monument’s current location, though some potential sites were identified east of the Intersection. However, for nearly a century the Monument has been located on the west side of the Intersection, easily visible to passing motorists traveling westbound on State Highway 7. During our meetings with the public, community members strongly preferred that if the Monument was relocated, the new site should be west of the Intersection in a location visible to westbound traffic.

The site on the SW corner of the intersection of 95<sup>th</sup> Street and State Highway 7 fits that profile. Moreover, this site has other advantages:

- The Monument would remain in the East County, near the intended “Road of Remembrance” and visible to thousands of residents each day.
- The site is directly adjacent to existing parking, sidewalks, bike paths, and public transportation.
- The site should provide ample space for landscaping and new amenities such as interpretive signage to further honor those who served in WWI.

- CDOT is presently designing an expansion of the intersection of 95<sup>th</sup> Street and State Highway 7. The relocation could be integrated into that planning and construction, so that it should not interfere with any reasonably foreseeable, future highway or intersection widening projects.

- As discussed below, the current landowner of the site has indicated a willingness to transfer the land for the relocation to some public or non-profit agency. City of Lafayette personnel have suggested that the City may be open to considering such a transfer.

While details of this relocation plan remain unanswered or open for further discussion, the Working Group recommends that the following steps be taken:

1. The size and location of relocation site should be determined. The proposed site would be a small parcel carved from Lot 2 of the Atlas Valley Shopping Center, currently owned by Atlas Valley II LLLP. A number of issues must be addressed before this parcel can be available as a relocation site:

a. Lot 2 was created through a subdivision process approved by the City of Lafayette, and any further subdivision of Lot 2 will require approval by the City.

b. As part of the PUD process, the landowner was required to construct a landscaped rock feature on the portion of Lot 2 southwest of and facing the intersection. It is probable that this landscaping will be removed to accommodate the Monument. Again, such a change will require approval by the City.

c. Several rainwater diversion and retention structures are situated on Lot 2 to provide drainage for both the parking areas in the shopping center, and the runoff from road surfaces on 95<sup>th</sup> Street and State Highway 7. Depending how the relocated Monument is situated, these structures likely will be impacted.

d. CDOT is currently in the planning phase for an expansion of the intersection of 95<sup>th</sup> Street and State Highway 7. This project may require (i) CDOT to acquire some property from Lot 2 for the expansion of 95<sup>th</sup> Street and/or State Highway 7, and (ii) some expansion or reconfiguration of the rainwater diversion and retention structures.

Accordingly, several steps must be taken to define the parcel to be transferred for the relocation of the Monument:

- While the design for the new site need not finalized, the rough size and dimensions of the parcel should be determined.

- Working with CDOT and other professionals, the location of a parcel with these dimensions should be laid out on Lot 2, consistent with the existing and planned roadways, parking lots, sidewalks, and rainwater structures.

- When this parcel is defined, any necessary approval processes for the subdivision and transfer of the parcel should be completed.

2. Agreement should be reached on the ownership and future maintenance responsibilities for the new parcel and relocated pillars. History teaches that the ownership of and maintenance responsibility for the Monument must be assumed by some specific organization, preferably a public entity with perpetual existence. The landowner is open to discussing a variety of legal arrangements, but the ownership and responsibility for maintaining the site and the Monument must be clearly defined. The governmental entities with jurisdiction over the Monument and the relocation site must come to some agreement concerning these issues.

3. A design for the new site should be prepared with professional assistance and public input. Substantial additional work will be needed to finalize the design of the relocation site. As this process unfolds, the Working Group recommends that this final design:

- Strive to capture many of the design elements from the original 1928 Road of Remembrance Gateway such as the orientation and spacing of the stone pillars, the wye gateway configuration, and the triangular memorial park, while engaging travelers with interesting and varying views of the structures from the adjacent roadways;
- Provide for access to the Monument from adjacent public areas;
- Enhance the memorial purpose of the original Gateway by honoring those who served this country and telling the story behind its construction with interpretive signage and other features; and
- Use environmentally sound practices on the new parcel that promote the community's goals.

4. Relocation of the Monument must meet historic preservation standards, while the design and construction processes should reflect current environmental and safety practices. Putting aside the impacts from Evergreen Devco's construction, the Monument's stone pillars have been neglected for far too long. The relocation of the pillars will provide an opportunity to repair and refurbish the pillars, preparing them for the next century or more of service. This work should be consistent with relevant historic preservation guidelines, while at the same time insuring the pillars' stability and durability.

The construction of the related features on the relocation site such as signage, walkways, and plantings should be compatible with the historic design of the Monument, but also reflect current best practices and standards. In particular, environmental sustainability should be a hallmark of the area.


5. Funding for the design and construction of the New Gateway must be a key priority. As reflected above, the urgent need for mitigating the damage to the Monument – and hence a relocation plan – resulted from the impacts created by the intersection reconfiguration promoted and designed as part of the development at Nine Mile Corner. If County of Boulder requests and CDOT requirements had been voluntarily met or administratively compelled, the current situation with the Monument would be much different. None of that occurred.

The Working Group believes that it is incumbent on those entities who should have avoided impacting the Monument or protected it in 2019 and 2020 to now lead the way in funding the mitigation plan. This perspective is not as a matter of finger pointing or laying blame, but as part of a community effort to save and reinvigorate part of our heritage. The plan outlined above not only saves the Monument, but bolsters and enhances its original purpose. If the relocation plan is implemented, some members of the Working Group will continue to work on those enhancements, including assisting with fundraising for many of the features previously discussed.

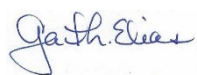
### CONCLUSION

We hope that CDOT and SHPO concur with these recommendations, and look forward to working with all of the stakeholders to restore the Road of Remembrance Gateway and honor those who served our country in a time of peril.

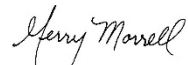
Boulder Rotary Club

By:   
William D. Meyer  
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