# U.S. DEPARTMENT OF ENERGY

# GOLDEN FIELD OFFICE

# Floodplain and Wetlands Assessment for Construction of a Second Full Service Access Road over Lena Gulch from South Golden Road to the National Renewable Energy Laboratory's South Table Mountain Complex Golden, Colorado

**May 2011**

# 1. INTRODUCTION

The U.S. Department of Energy (DOE) Golden Field Office (GO) is proposing to construct a second full service access road to the National Renewable Energy Laboratory (NREL) South Table Mountain (STM) complex that would span Lena Gulch and the associated 100-year floodplain. This floodplain and wetland assessment has been prepared in accordance with Title 10 Code of Federal Regulations (CFR) Part 1022, *Compliance with Floodplain and Wetland Environmental Review Requirements* which were promulgated to implement the requirements of the DOE's responsibilities under Executive Order 11988, *Floodplain Management* and Executive Order 11990, *Wetlands Protection*. These regulations and Executive Orders encourage measures to preserve and enhance the natural and beneficial functions of floodplains and wetlands. These regulations and Executive Orders also require federal agencies to avoid, to the extent possible, the long- and short-term adverse impacts associated with the destruction or modification of wetlands and the occupancy and modification of floodplains.

According to 10 CFR 1022, a floodplain is defined as the lowlands adjoining inland and coastal waters and relatively flat areas and flood prone areas of offshore islands, including the base floodplain that is the area inundated by a 1% or greater chance flood in any given year. Per 10 CFR 1022.4, a wetland is defined as an area that is inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal conditions does support, a prevalence of vegetation typically adapted for life in saturated soil conditions, including swamps, marshes, bogs, and similar areas. A Floodplain Action is any DOE action that takes place in a floodplain including actions in a wetland contained in a floodplain.

The project area is south of the STM site (Figure 1) and shown in greater detail in Figures 2 and 3. As reflected in Figure 3, this assessment evaluates the potential effects to floodplains and wetlands associated with the construction of a second full service access road to the NREL STM Site. DOE is distributing this assessment to appropriate government agencies and other interested parties for review and comment. Once comments are received and considered, DOE will prepare a Floodplain and Wetlands Statement of Findings that will be distributed to appropriate government agencies and to others who submitted comments on the proposed floodplain/wetlands action.

Alternative corridors for a second full service access road were considered and analyzed in the *Supplement- II to Final Site-Wide Environmental Assessment of the National Renewable Energy Laboratory's South Table Mountain Complex* (DOE/EA 1440-S-II), which concluded with a Finding of No Significant Impact (FONSI). Corridor B/C (Figure 2) was selected by DOE as the preferred alternative and the FONSI to the DOE/EA 1440-S-II concluded that a route connecting the STM to South Golden Road could be accomplished without significant impacts. This conclusion was based upon the analyses in DOE/EA-1440-S-II as well as consultations with federal, state, and local agencies. These documents are available at http://www.eere.energy.gov/golden/Reading_Room.aspx. All descriptions of affected

environment, overall project narrative, and overall environmental effects of this project with corridor alternatives are incorporated here by reference (DOE/EA 1440-S-II).

# 2. PROJECT DESCRIPTION

## 2.1. Description of the Project

The proposed second full service access road would allow access to the south end of the NREL STM site (Figure 1). This access road would extend from South (Old) Golden Road to the southern end of the recently expanded NREL property (Figures 2 and 3). The access road would consist of two-way traffic in two lanes, plus bicycle lanes, within an approximate 60 foot-wide right-of-way (Figure 3). The new access road would extend north along the property line between Jefferson County Open Space and private property to the west, connecting to South Golden Road by means of a roundabout, instead of a conventional intersection (Figure 3). The intersection currently extends south from South Golden Road via Moss Street, with an existing stop sign on Moss Street and no traffic control on South Golden Road. This project would extend Moss Street (Moss Street Extension) north to the STM site parking lots.

As stated in DOE/EA 1440-S-II, the B/C alternative was chosen (Figure 2), and a FONSI was issued for the project on November 6, 2009. Therefore, a discussion of the alternatives will not be included here. Because all routing options would have the potential to affect wetlands and/or floodplains, DOE is providing a single route (Moss Street Extension) to address in this floodplain and wetlands assessment.

## 2.2. Description of Floodplain

In the vicinity of the proposed project, the 100-year floodplain on Lena Gulch is approximately 300 feet wide at the bridge crossing (Figure 3) and much narrower (approximately 60 feet wide) at the north end turn-around point along a Lena Gulch tributary. The south bank at the bridge crossing is roughly 8 feet higher than the north bank, with the stream channel situated closer to the south bank. The banks support herbaceous vegetation, trees and shrubs, creating a relatively thick vegetative cover.

## 2.3. Description of Wetlands

Wetlands were delineated using the U.S. Army Corps of Engineers (USACE) Manual for Wetland Delineations in the Great Plains Region (USACE 2008). This delineation was sent to the USACE resulting in concurrence of jurisdictional Waters of the U.S. including wetlands (riparian fringe association comprised of riverine unconsolidated shore – vegetated or riverine streambed - sand). These areas are depicted on Figure 3. The wetlands along the banks of Lena Gulch have an understory of sedges and grasses with an overstory of willow and cottonwood. Downstream of the project area, in Pleasant View Park, constructed wetlands exist in a side-channel area that receives floodwater. This area currently consists of palustrine emergent wetlands. The lower portion of the constructed wetland is dominated by cattails while the upper portion contains rushes, sedges, and grasses.

## 3. ANTICIPATED IMPACTS OF THE PROPOSED PROJECT TO FLOODPLAINS AND WETLANDS

Changes to floodplains or wetlands, such as the activities involved in constructing a road, must be assessed and the results of those assessments must be reviewed and approved by government agencies. Changes in the floodplain (e.g., the installation of culverts, wingwalls, etc,) may change the flood regime of the local floodway. The affects of these changes need to be addressed so that the possibility of flooding in new areas, especially where structures exist, is avoided. This is done by modeling and providing a Conditional Letter of Map Revision (CLOMR) to both the Urban Drainage and Flood Control District in Denver, and the Federal Emergency Management Agency (FEMA).

Impacts to wetlands must be addressed under Section 404 of the Clean Water Act. Waters of the U.S., including wetlands, are administered under the U.S. Army Corps of Engineers (USACE). Wetlands provide flood control, aid in water quality, and provide wildlife habitat. Impacts to wetlands must be minimized and mitigated.

A CLOMR is required as part of the Moss Street Extension project, because road and bridge construction activities would occur in the floodplain. The affected Flood Insurance Rate Map is number 08059C0281E with an effective date of June 17, 2003. The affected water bodies are Lena Gulch and Lena Gulch Tributary (also known as Pleasant View Tributary). The proposed improvements for the Moss Street crossing of Lena Gulch would include a clear span bridge with concrete abutments, minor channel modifications, and riprap channel protection. The proposed Moss Street crossing of Lena Gulch Tributary would include two 10' span by 4' rise concrete box culverts with concrete headwalls and wingwalls and riprap channel protection. Approximately 300 linear feet of the Lena Gulch Tributary channel on the east side of the proposed Moss Street Extension would be shifted 40 feet to the east to allow for construction of the roadway. The proposed improvements associated with the Moss Street Extension Project would result in changes, such as improvements to 1% of the annual chance (100-year) and 0.2% of the annual chance (500-year) floodplain delineations for Lena Gulch and the Lena Gulch Tributary. Although these structures would be placed in the floodplain, there would be no increase in the Base Flood Elevations from pre-project conditions to post-project conditions. The conditions within Lena Gulch, Lena Gulch Tributary, and a CLOMR were confirmed by FEMA on February 25, 2011.

No long-term negative direct or indirect impacts to the beneficial values of the 100-year floodplain of Lena Gulch would be expected under the proposed action. No effects to lives and property associated with floodplain disturbance are anticipated. This is based on results of the CLOMR modeling. Short-term direct impacts to the floodplain would result from the temporary disturbance of the area during excavation and construction activities associated with the bridge and road construction. Additionally, the possibility of sediment run-off or erosion could occur as a result of a storm during the construction period. The erosion has the potential to result in a temporary localized reduction in the water quality of Lena Gulch. However, this action would abide by the requirements of the Colorado Water Quality Control Act as well as Colorado

Department of Public Health and Environment (CDPHE) Water Quality Control Commission Regulation No. 61 – Colorado Discharge Permit System (CDPS)(5 CCR 1002-61). Sediment and erosion controls such as silt fencing, rock socks, rip rap, silt dikes, etc. would prevent disturbance to adjacent areas of the floodplain and would protect Lena Gulch from the influx of silt containing runoff. Spill control measures would be utilized when necessary and spill control kits would be readily available for use at the project areas where heavy equipment would be utilized. After excavation and installation activities are completed, the remaining affected floodplain areas would be graded, seeded and restored to their previous. Permit coverage under the CDPS General Permit for Stormwater Discharges Associated with Construction Activity (COR-030000) would be obtained. A stormwater management plan would be developed and implemented prior to construction and NREL staff would oversee project activities.

Lena Gulch and associated tributaries were reviewed by a wetland biologist in summer of 2009 (DOE 2009). Wetlands were mapped along Lena Gulch and areas of impact were derived by overlaying construction drawings on top of the wetland map (Figure 3). The installation of the concrete abutments, minor channel modifications, and riprap channel protection will result in the permanent loss of 0.25 acres of wetlands along Lena Gulch. In addition to the permanent wetland impacts, there will be 0.035 acres of temporary wetland loss due to minor channel modifications and construction access. The project area within Lena Gulch Tributary has no jurisdictional wetlands (see north end of project area in Figure 3).

The survival, quality and function of wetlands would be changed due to the permanent loss of wetlands and these permanent impacts would be mitigated. Construction of short duration, with implementation of sediment and erosion controls, would ensure the survivability of wetlands located downstream along the banks and the constructed wetlands. Temporarily impacted Waters of the U.S., although small in area, would be graded, seeded and restored to their previous conditions. The area of temporarily impacted waters would be minimized due to project design considerations at the stream crossing that avoided and minimized temporary impacts to the gulch.

## 4. ALTERNATIVES EVALUATED

Alternative corridors were discussed and addressed in the DOE/EA 1440-S-II, and the B/C corridor was selected as the preferred alternative. A route within the B/C corridor has been selected for the Moss Street Extension, and additional required consultations with regulatory agencies have been or are being completed. Documentation of these consultations and the floodplain/wetland Statement of Findings will be consolidated into a Supplement Analysis document that will be posted on the DOE public reading room webpage at: http://www.eere.energy.gov/golden/Reading_Room.aspx. Any route within the B/C corridor requires a bridge across Lena Gulch; therefore, the analysis of the impacts from the Moss Street Extension (Figures 2 and 3) to the Lena Gulch floodplain and wetlands is provided as the preferred alternative.

## 5. MITIGATION

A CLOMR was submitted for review, first to Jefferson County, then Urban Drainage and Flood Control District, and subsequently to FEMA. A letter of concurrence regarding the CLOMR was received from FEMA on February 25, 2011. Once the Moss Street Extension project is completed, an application for floodplain map revision would be submitted to Urban Drainage and Flood Control District and FEMA. FEMA would issue a Letter of Map Revision (LOMR) upon concurrence with the findings of the map revision application.).

The activities in Waters of the U.S. including wetlands would be conducted under a USACE Nationwide Permit No. 14 (NWP 14) for Linear Transportation Projects. DOE received approval to use the NWP 14 on February 15, 2011. The USACE requested wetland mitigation of 0.25 acres for this project; this request was met via the purchase of 0.25 acres of wetland banking credits through coordination with the South Platte Wetlands Bank in Brighton, Colorado. As stated in Section 2, the impact to Waters of the U.S., including wetlands, has been minimized by project design. Temporary impacts would be mitigated by grading to original contours and reseeding.

Overall, impacts to floodplain and wetlands would be mitigated through the establishment of stormwater erosion controls and oversight by NREL staff during construction.

## 6. CONCLUSIONS

It is anticipated that this project would not result in adverse impacts to the 100-year floodplain. Temporary disturbance within the floodplain would cease following completion of construction activities associated with this proposed action. Proper erosion and sediment control measures would be utilized and site restoration would occur upon completion of the construction activity. This proposed action would not result in any increase in the Base Flood Elevations from pre-project conditions to post-project conditions or other long-term impacts to the floodplain and its functionality. No effects to lives and property associated with floodplain disturbance are anticipated.

The installation of the concrete abutments, minor channel modifications, and riprap channel protection would result in the permanent loss of 0.25 acres of wetlands along Lena Gulch. In accordance with 40 CFR 230, *Compensatory Mitigation for Losses of Aquatic Resources*, as well as U.S. Environmental Protection Agency's and USACE's policy of "No Net Loss" of jurisdictional wetlands, DOE would purchase compensatory mitigation credits from an approved wetland mitigation bank in Brighton, Colorado

In accordance with 10 CFR Part 1022, a Statement of Findings based on the information in this document would be published. The Statement of Findings would include a brief description of the proposed action, an explanation of why it is located in a floodplain, the alternatives considered, a statement indicating if the action conforms to state and local floodplain requirements, an explanation of wetland mitigation steps, and a brief description of the steps to be taken to minimize potential harm within the floodplain and wetlands. After publication, a 15-day public review period is required before implementing the proposed action.

## 7. REFERENCES


Code of Federal Regulations, Title 10, Energy, Part 1022, Compliance with Floodplain and Wetland Environmental Review Requirements.

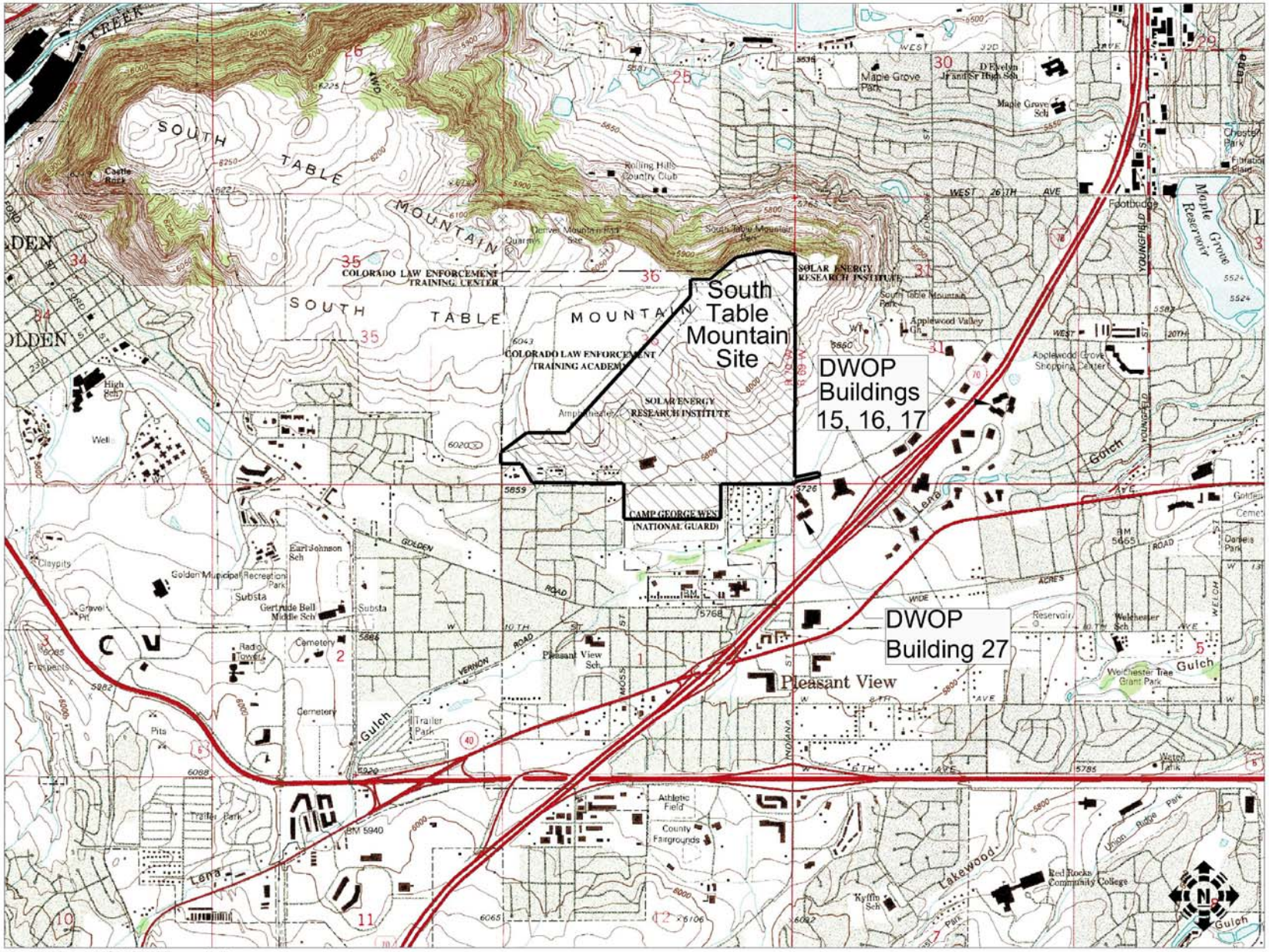
Code of Federal Regulations, Title 40, Environment, Part 230, Compensatory Mitigation for Losses of Aquatic Resources.

DOE (U.S. Department of Energy), 2009. *Supplement- II to Final Site-Wide Environmental Assessment of the National Renewable Energy Laboratory's South Table Mountain Complex.* DOE/EA 1440-S-II. November.

DOE (U.S. Department of Energy), 2009. Wetland Delineation of Lena Gulch. Letter and Delineation to the U.S. Army Corps of Engineers from the U.S. Department of Energy. Corp File NOW-2011-255-DEN. November.

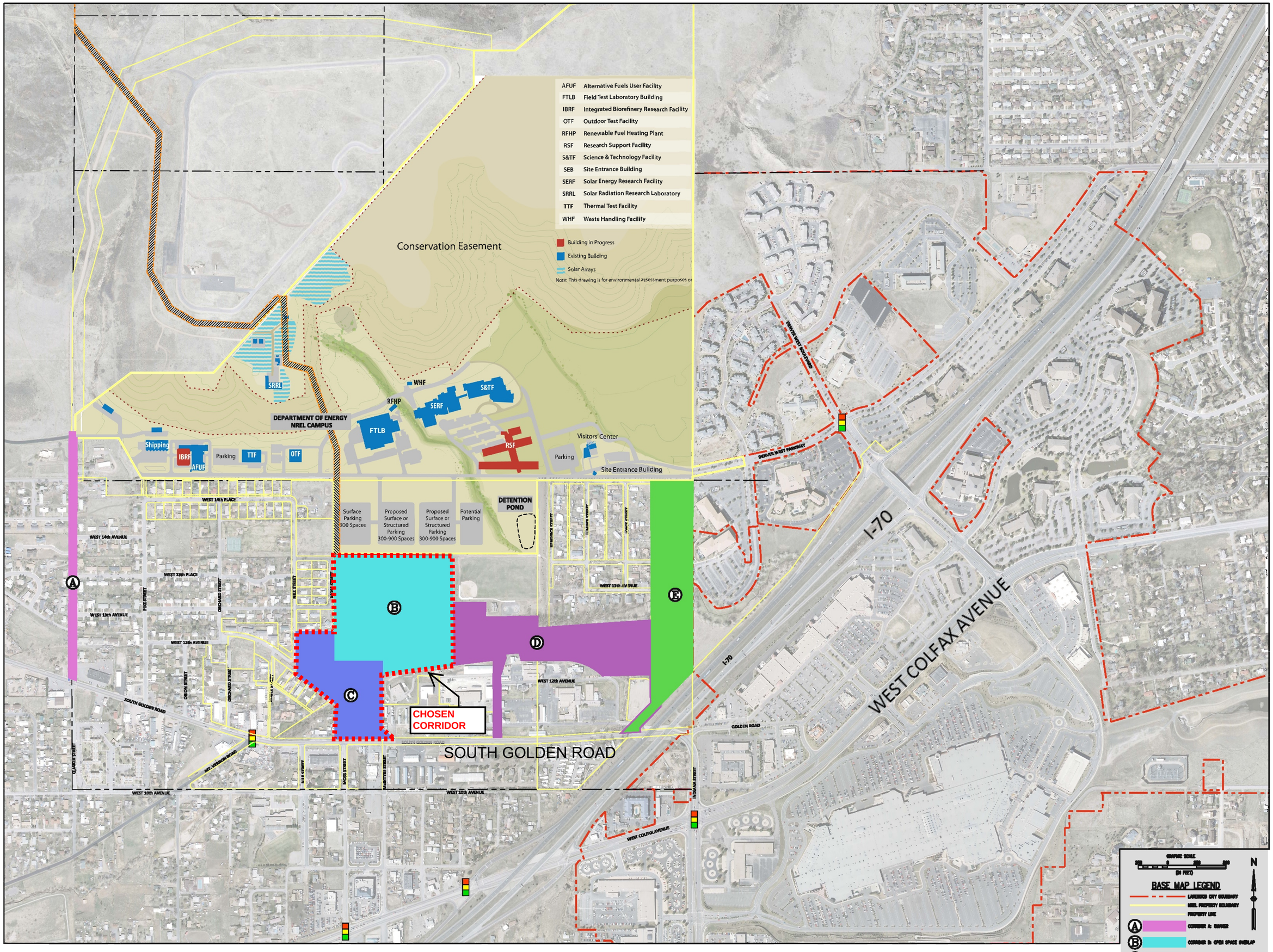
Environmental Laboratory. (1987). *Corps of Engineers Wetlands Delineation Manual*. Technical Report Y-87-1, U.S. Army Engineer Waterways Experiment Station, Vicksburg, MS.

U.S. Army Corps of Engineers. 2008. Interim Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Great Plains Region, ed. J. S. Wakeley, R. W. Lichvar, and C. V. Noble. ERDC/EL TR-08-1. Vicksburg, MS: U.S. Army Engineer Research and Development Center.



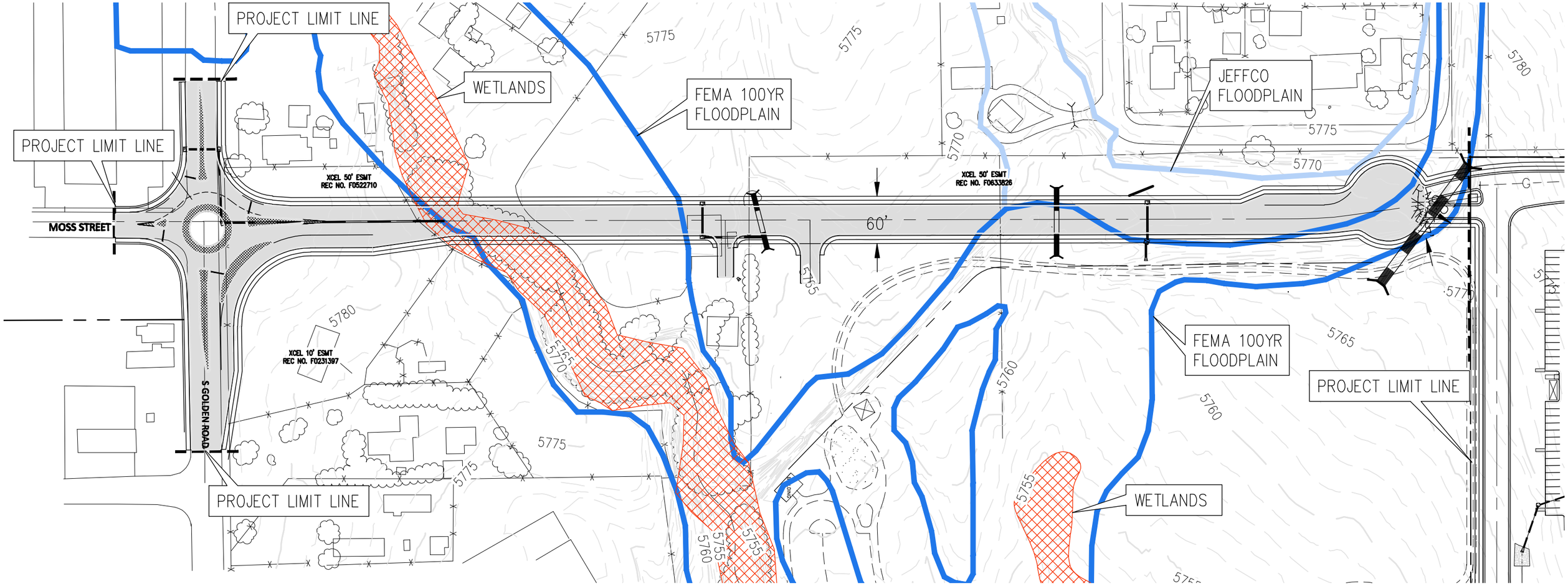

Base Map Source: USGS 1:24,000 Topographic Maps
Golden, Morrison, 1994

Figure 1. STM Site Vicinity

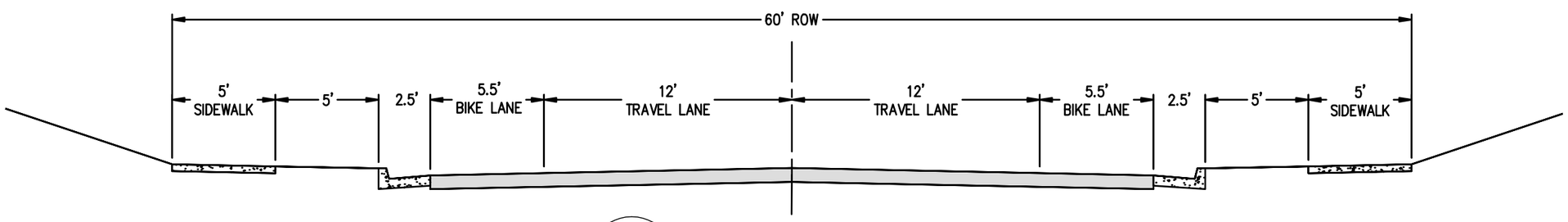



SELECTED CORRIDOR FOR SECONDARY ACCESS ROAD PROJECT

FIGURE 2




1 C2 C2 MOSS STREET ALIGNMENT
ROUND-ABOUT INTERSECTION




2 C2 C2 TWO-LANE COLLECTOR STREET SECTION
SCALE: 1" = 5'

GRAPHIC SCALE
120 0 120 240
(IN FEET)
1 INCH = 120 FT

**SECONDARY ACCESS ROAD SITE PLAN WITH ROADWAY CROSS-SECTION**

**FIGURE 3**