
CHAPTER 3.0: TRANSPORTATION IMPACTS

Chapter 4.0 of the Final Environmental Impact Statement (FEIS) provided information about transportation impacts of the Light Trail Transit (LRT) alternative, including:

- ▶ Compatibility with local plans and policies.
- ▶ Transit demand.
- ▶ Transit operations and impacts.
- ▶ Freight and rail impacts.
- ▶ Roadway operations and impacts.
- ▶ Pedestrian and bicycle facility impacts.
- ▶ Construction impacts.
- ▶ System linkages.

This chapter discusses changes that would occur to transportation performance and impacts as a result of the Revised Design or updating traffic and ridership forecasts to 2030.

3.1 COMPATIBILITY WITH TRANSPORTATION PLANS AND POLICIES

The FEIS discussed a number of plans with which the LRT Alternative is compatible. This situation remains the same plus the project is now included in the *Denver Regional Council of Government (DRCOG) 2030 Metro Vision Regional Transportation Plan (RTP)*, the fiscally-constrained plan for the metropolitan area.

3.2 TRAVEL DEMAND

There are no changes to this FEIS section. The LRT Alternative would result in improved transit service and capacity, would not be greatly affected by adverse weather conditions, and would provide greater transportation capacity than equivalent bus or roadway improvements.

3.3 TRANSIT OPERATIONS AND IMPACTS

Re-analysis of transit operations and impacts has been done using the new 2030 regional transportation model. This re-analysis showed the following differences in key characteristics of the proposed LRT service between the FEIS and the Revised EA:

- ▶ Average weekday ridership decreased slightly from 31,100 to 29,698.
- ▶ Average weekday system-wide linked trips increased from 296,000 to 428,800.

The Revised Design would modify the PE Design by including a single-track alignment from the Denver Federal Center west to the end-of-line at the Jefferson County Government Complex (JCGC) (see Section 2.4.3). In response to concerns regarding affects on future service delivery, RTD evaluated this design change using train headways of 15, 10, 7.5 and 5 minutes. The

analysis determined that single tracking would result in considerable cost savings but not affect the LRT service demand levels. Specific results for single tracking include:

- ▶ Fifteen-minute headways viable with passing track at Red Rocks.
- ▶ Ten-minute headways would require an additional passing track between Colfax and I-70 and lengthening of the passing track at Red Rocks.
- ▶ Adequate CDOT right-of-way would be preserved for a second track in accordance with the signed Intergovernmental Agreement (IGA) between RTD and CDOT dated February 22, 2006.
- ▶ 7.5- and 5-minute headways would severely complicate single-track transit operations. For this reason, LRT systems do not operate below 10 minute headways on single track.
- ▶ A 15-minute headway west of DFC corresponded to projected ridership as predicted by the regional transportation demand model which has been calibrated to account for demand experienced on other RTD LRT corridors.

The total number of parking spaces in Table 3-1 indicates new parking facilities to be built. Proposed station parking has changed slightly since the FEIS, with 100 and 286 fewer spaces at the Federal/Decatur and JCGC stations, respectively, than planned during PE. The Oak Station would have 300 more spaces than in PE (in 2030). By year 2030 a total of 5,614 parking spaces will be provided for West Corridor patrons when 1,900 spaces to be leased at Invesco are included.

Table 3-1
Proposed New Parking Spaces

Station	Proposed Number of Spaces		
	PE	Revised Design	
		Opening Day	Year 2030
Federal/Decatur	2,000	1,900	1,900*
Knox	0	0	0
Perry	0	0	0
Sheridan	800	800	800
Lamar	0	0	0
Wadsworth	1,000	1,000	1,000
Garrison	0	0	0
Oak	200	200	500**
Denver Federal Center	1,000	1,000	1,000
Red Rocks CC	0	0	0
JCGC	700	414	414
Total	5,700	5,314	5,614

*1,900 spaces to be leased at Invesco Field.

**An additional 300 spaces at Oak are assumed to be provided by 2030. This was fully analyzed in the FEIS.

Another change regarding transit operations relates to a commitment in the FEIS for RTD to provide a circulator bus service between the Red Rocks station and Colorado Mills Mall. When

this concept was proposed during PE, the Red Rocks station was proposed for the north side of US 6. The alignment change and relocation of the station to the south makes providing this service with previously planned, regular bus routes, connecting to the LRT at the Denver Federal Center Station via Routes 17 and 125, more efficient than with an extended circulator. The neighborhoods on the north side of US 6 will experience slightly reduced traffic since the circulator bus would have been partially routed on existing residential streets.

3.4 ROADWAY OPERATIONS AND IMPACTS

3.4.1 Station Areas

Re-analysis and roadway operations and impacts have been done recently using the new 2030 regional transportation model.

The Revised Design would result in very minor changes to project-generated traffic patterns. To determine if the 2030 model projections for background traffic were significantly different, intersections were examined using a two-stage approach. If the changes were significant in both cases, then it could be said that the traffic forecasting models for Years 2025 and 2030 were producing different background results that need to be re-examined. The first step was to compare the 2025 and 2030 volumes at an intersection. If the traffic volumes were within 10 percent of each other, no new traffic analysis was due.

The second step was to take those intersections that had projections with a greater than ten percent difference and look at the overall growth rates that the models were projecting. The growth rate is determined by comparing 2005 to 2030 model forecasted growth to the previous 2001 to 2025 forecasted growth. If the growth rates indicated by the two models were similar, or the 2030 model projected smaller growth rates, then there would be no need to re-evaluate the impacts of background traffic.

After performing this review on the intersections closest to the light rail stations, there were two locations with significant differences between the two models. These locations were Federal Boulevard and Howard Place, and 6th and Earl Johnson Road. At 6th and Earl Johnson, volumes indicated that a 6-lane section would be required on 6th Avenue with or without the West Corridor project. An analysis of revised parking garage locations completed in March 2006 showed that project trips would not degrade the operating Level of Service (LOS) on 6th Avenue. The 6th Avenue operating LOS would be D if three lanes in each direction were in place. In reviewing and negotiating the intersection improvements with the Colorado Department of Transportation (CDOT), the West Corridor project would allow sufficient right-of-way for an additional westbound right turn lane should it be needed in the future.

An analysis of Federal Boulevard and Howard Place was done with the 2030 volumes. That analysis shows that the operations of the intersection with the mitigation measures identified in the FEIS are the same as originally reported. The overall LOS for 2030 AM traffic is B and for PM traffic is C.

Based on this analysis and other minor design changes, the Traffic Mitigation Measures have been modified. A new list of these is included in Table 3-2. The text shown in bold font below reflects new mitigation measures from what was included in the FEIS, while strike-through items represent mitigation measures which were included in the FEIS but removed as part of the revised design. The double left turn lanes and additional through lanes shown for Wadsworth at Colfax were not in place during PE, but have since been built as part of a separate project by the City of Lakewood. Therefore, the Revised Design no longer includes these improvements.

Table 3-2
Station Area Traffic Mitigation

Station	Mitigation Measures
Federal/Decatur	<ul style="list-style-type: none"> ▪ Construct westbound double left turn lanes on Howard Place. ▪ Reconstruct parking access to accommodate left-in, right-in, right-out movements only. ▪ Reconstruct Howard Place from Federal Boulevard to Decatur Street to accommodate access and intersection improvements. ▪ Convert Irving Street/West 14th Avenue to all-way stop. ▪ Re stripe Irving Street/West 14th Avenue to add turn lanes. ▪ Construct bus pullouts on eastbound Howard Place.
Knox	<ul style="list-style-type: none"> ▪ Provide a bus pullout on either side of Knox Court. <i>Because of low traffic volumes, street stops planned. Pullouts can be added later if warranted.</i> ▪ Coordinate with the City and County of Denver on a parking management program if informal parking demand materializes as a result of the West Corridor project.
Perry	<ul style="list-style-type: none"> ▪ Provide crossing gates at the intersection of Perry Street and West 12th Avenue. <i>Insufficient width for crossing gate; will install "No Left Turn" traffic sign or traffic signal head</i> ▪ Coordinate with the City and County of Denver on a parking management program if information parking demand materializes as a result of the West Corridor project.
Sheridan*	<ul style="list-style-type: none"> ▪ Add eastbound left-turn lane on West 10th Avenue. ▪ Add eastbound right-turn lane on West 10th Avenue. ▪ Provide left-turn arrows at the Sheridan Boulevard intersections with West 14th Avenue and West 10th Avenue. ▪ Provide a right-in, right-out intersection along southbound Sheridan Boulevard north of West 10th Avenue for access to parking garage.
Lamar	<ul style="list-style-type: none"> ▪ Coordinate with the City of Lakewood on a parking management program or other mitigation measures if informal parking demand materializes as a result of the West Corridor project. ▪ Pursue the addition of two bus pullouts. <i>Because of low traffic volumes, street stops planned. Pullouts can be added later if warranted.</i>
Wadsworth*	<ul style="list-style-type: none"> ▪ Add on-street bus bays between West 13th and West 14th Avenues. ▪ Provide a right-in, right-out intersection along northbound Wadsworth Boulevard <i>north of or at West 13th Avenue for access to parking garage.</i> ▪ Widen West 14th Avenue to provide westbound double left-turn lanes and an eastbound right-turn lane) at the park-n-Ride access along West 14th Avenue. ▪ Provide auxiliary lanes (eastbound and westbound left turn lanes and an eastbound right turn lane) at the park n Ride access along West 14th Avenue ▪ Improvements to Wadsworth Boulevard/West Colfax have been completed. ▪ Add double left turn lanes on all approaches ▪ Add a third northbound and southbound through lane
Garrison	<ul style="list-style-type: none"> ▪ Coordinate traffic signals as needed at Garrison Street/West Colfax Avenue and Garrison Street/West 14th Avenue. ▪ Pursue kiss-n-Ride opportunities. ▪ Maintain existing West 13th Avenue, 20 feet wide as two-way operation.

Table 3-2
Station Area Traffic Mitigation

Station	Mitigation Measures
	<ul style="list-style-type: none"> Provide quad gates on Garrison Street to prevent turns across the LRT tracks.
Oak	<ul style="list-style-type: none"> Provide a new roadway connecting Oak Street and Quail Street. Provide four off-street bus bays.
Red Rocks	<ul style="list-style-type: none"> Coordinate with the City of Lakewood on a parking management program or other mitigation measures if informal parking demand materializes as a result of the West Corridor project. Provide a bus loop west of Arbutus.
Denver Federal Center	<ul style="list-style-type: none"> Provide a new roadway (Quail Street connecting West Alameda Avenue and Denver Federal Center Station at West 2nd Avenue. <i>Road named changed to Routt Street., St. Anthony's hospital developer is responsible for construction of the road from Alameda to 2nd Avenue. RTD will construct the extension from 2nd Avenue to North Street as a condition of purchase of 15 acres at the federal site. Funding is being shared by RTD and the hospital developer.</i> Construct eastbound double left turn lanes at the new intersection of West Alameda Avenue and Quail Street Construct a westbound right turn lane at the new intersection of West Alameda Avenue and Quail Street Provide a traffic signal at the new intersection of West Alameda Avenue and Quail Street.
Jefferson County Government Center	<ul style="list-style-type: none"> No mitigation necessary due to implementation of LRT other than access improvements at West 10th Avenue. Agreement reached with Jefferson County to have the County build a new access road connecting Jefferson County Parkway to Johnson Road. Provide two off-street bus pullouts; modify Johnson Road southbound to have two left turn lanes, two thru lanes and exclusive right-turn lane.

* Final traffic mitigation approaches at the Sheridan and Wadsworth stations may change based the parking and TOD configurations developed in association with private developers.

3.4.2 Burnham Yard Area

The Revised Design would create two new at-grade freight rail crossings at Rio Court and Shoshone Street. These crossings would replace crossings at 5th and Curtis which were planned to be crossed by the PE Design and are currently crossed. Rio Court is relatively well used compared to other streets in the area. Still, Rio Court only sees approximately 500 vehicles per day (vpd) and Shoshone Street experiences less than 200 vehicles per day (vpd). In comparison, 5th Street and Curtis Street, where the current Burnham Lead freight crossings are located, have about 1000 and 1500 vehicles per day respectively. While the actual number of physical crossings required by the relocation of the Burnham Lead would be same, the actual train impacts to traffic would be less as compared to impacts today. Currently both LRT and freight trains cross 13th Avenue, Curtis Street, and 5th Street. Under the new alignment, freight trains would cross 13th Avenue, Rio Court, and Shoshone Street. Peak hour LRT impacts would remain the same. Freight traffic would cross less traveled streets effectively reducing the exposure of vehicles to crossing trains. The new crossings would include safety measures equivalent in control to the existing three crossings. These would include gates, medians, lights, and bells. The design of these new crossings is being done by the Union Pacific Railroad, so the final decision on the type of grade crossing protection would be made as a part of this process.

The proposed freight rail crossing at 13th Avenue would be wider than the existing crossing. Since operations are assumed to be the same, the impacts of freight operations on 13th due to the realignment would be minor. The main impact will be the shortening of the eastbound storage distance between the crossing gate and Rio Court. Based on sketches provided, the realignment of the track will cause a loss of approximately 50 feet of vehicle storage and cause a realignment of the Pecos Street Access from 13th Avenue. The 2000 Central Platte Valley Light Rail Transit 13th Avenue Grade Crossing Study prepared by BRW calculated a 90th percentile queue length of 320 feet for back to back LRT arrivals. The distance from the existing gate to Rio Court and Quivas Street is 150 feet and 360 feet respectively. By moving the gate west approximately 50 feet, Quivas Street will now likely see some blocking in the peak hour due to LRT operations and the widened crossing distance.

The elimination of the Harlan maintenance facility would result in more LRT trains using the LRT tracks which cross 13th Avenue to access the Elati Maintenance Facility. These would not occur during the peak traffic period, therefore there would be no additional effect on 13th as a result of this changed condition during peak conditions.

The minor property access on the Pecos Street right-of-way under current conditions has limited right in/right out access immediately adjacent to the Burnham Lead. The Union Pacific Railroad is currently conducting design for this section and the alignment of the Burnham Lead may be modified so as not to impact this minor property access.

Changes since the FEIS to grade, as well as the location of the West Corridor grade-separated crossing of the CML, necessitate the closing of Old Colfax Avenue at the LRT tracks. While this roadway does see some circulating traffic, the overall numbers are quite small. Counts taken on July 11, 2007 showed a total of 288 vehicles using Old Colfax in a 24 hour period. With the closure of Old Colfax, these vehicles would be rerouted to 13th Avenue by way of Rio Court or Shoshone Street. The impacts of this small number of vehicles on overall traffic operations would be negligible.

3.5 ANALYSIS OF EFFECT TO FUTURE TRANSPORTATION IMPROVEMENTS

As part of the final design process, RTD conducted an analysis of the effect of the construction of the LRT Alternative on future transportation projects in order to not preclude or inhibit such future transportation improvements. Preliminary conclusions reached in the analysis include:

- ▶ The Revised Design would not preclude adding a second right turn lane on westbound US 6 at its intersection with northbound Earl Johnson Road.
- ▶ The original PE Design bridge at Colfax Avenue was 1,140-feet-long and would have limited planned highway improvements. The Revised Design includes an approximately 500-foot long bridge. The analysis considered several possible interchange configurations that CDOT might consider and determined the LRT Alternative would not prevent future interchange modifications.

- ▶ The proposed LRT crossing under I-70 would run parallel to and approximately 100 feet to the north of US 6. The LRT will be built underneath I-70 just north of the I-70 bridges over US 6. The underpass structure itself will be about 300 feet long. At each end of the underpass there will be approach structures and retaining walls to transition back to existing topography. The underpass will be constructed to accommodate a future westbound auxiliary lane on US 6 connecting to I-70.
- ▶ The alignment of the LRT at the US 6/Indiana and the US 6/Union interchanges will not preclude reasonably foreseeable interchange improvements such as additional turn lanes. The tunnel previously considered under 6th Avenue at Union Street would have interfered with possible future modifications to the existing interchange.
- ▶ The structures for the LRT over Wadsworth Boulevard will have sufficient span length to accommodate a future widening of Wadsworth to 6 lanes, plus additional room for turn lanes needed to serve the park-n-Ride.
- ▶ The roadway structures being built or rebuilt for Sheridan Blvd. and Federal Blvd. over the LRT line will have sufficient through laneage and turn laneage to accommodate the 2030 forecasted volumes.

3.6 PEDESTRIAN AND BICYCLE FACILITIES IMPACTS

In the FEIS, bicycle and pedestrian impacts were anticipated related primarily to the LRT alignment and associated safety and sound barriers restricting north-south pedestrian movement along the corridor. To mitigate these impacts, bicycle and pedestrian crossings of the alignment will be provided at all LRT stations and at all at-grade street crossings. Pedestrian bridges and/or underpasses are proposed for Sanchez Park west of Federal Boulevard, between Knox and Perry Streets; the vicinity of Tennyson Street; the vicinity of Wolff Street, Pikeview Street, and Independence Street; and 6th Avenue/Arbutus Drive. The findings of the FEIS were based on a separate study: West Corridor Pedestrian and Bicycle Facilities Report (Gannett Fleming 2002), as well as local area plans, such as the Wenk 1996 study for the City of Lakewood. A summary of the alignment follows.

3.6.1 Existing Bike Path Alignment Description

From east to west, the bike path/route is a bike path on the south side of Lakewood Dry Gulch from the South Platte River to a point mid-way between Perry and Tennyson where the bike path crosses to the south side of the rail right-of-way. At this point, the bike path continues west, but is located along the south side of the rail right-of-way and the gulch. It continues on the south side of the alignment as a bike path that crosses under Sheridan and continues as an on-street (11th Avenue) facility to Harlan Street. At Harlan Street, the bike path continues along the east side of Harlan Street to the north where connects to a bike path that continues west from Harlan on the north side of the alignment. It continues on the north side of the alignment until a point near Marshall Street between Pierce and Lamar when it transitions to an on-street bike facility along 13th Avenue. The on-street bike lane continues west to Vance Street where the path becomes grade separated over Wadsworth Boulevard and separated from the street to Dudley Street. The path then continues on-street to Estes Street where it crosses over to the

south of the alignment and remains on-street to Garrison Street. It transitions back to the north side of the alignment at Garrison Street and continues west as a bike/pedestrian path to Kipling where it becomes grade separated. At Kipling it becomes an on-street bike facility along 13th Avenue as it heads west toward Oak Street. At Oak Street, the bike route continues south on Oak St. as an on-street facility to its termination at the City of Lakewood's Bellows Park Path and Lakewood's bicycle system. RTD is evaluating the design of the Oak Street station to provide on-street bike lanes to accommodate vehicles and bicycles safely from Oak Street. The plans for construction of a pedestrian path through the east bridge approach of the Kipling structure remain as described in the FEIS.

3.6.2 Proposed Bike Path Alignment

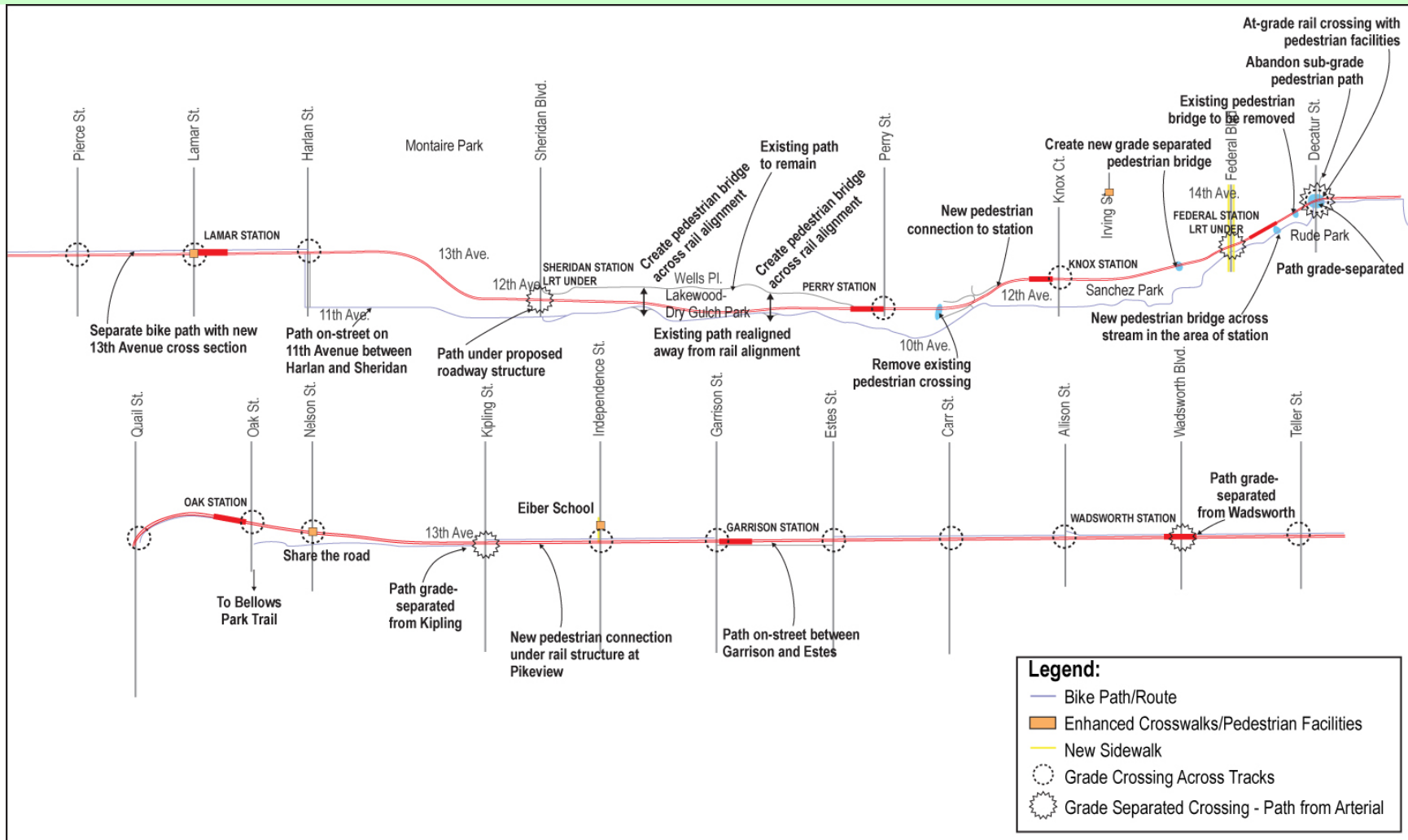
Since the FEIS was published, the City of Golden, City of Lakewood and the City and County of Denver have revised their bicycle plans and plan to change and expand the bicycle facilities using recently allocated funding. In addition, the Urban Drainage and Flood Control District project in Denver has required changes to the alignment of the bike path relative to the proposed LRT Alternative. The majority of the changes are on the east side of the corridor where the Lakewood Gulch bike path connects to the South Platte River Trail. The following section describes the changes to the bicycle facilities since the FEIS was published. Figure 3-1 shows the bicycle and pedestrian system proposed as part of the Revised Design.

- ▶ **South Platte River to Federal:** A new bike path alignment is planned on the north side of Lakewood Gulch and north of the LRT alignment. (It was planned for the south side in the FEIS, thereby avoiding a track crossing.) In the new alignment, from the South Platte River trail, it will stay on the north side of the proposed new gulch channel until a point approximately 400 feet east of Decatur Street where the alignment will "Y." The northern branch will continue west, north of the gulch channel, and connect with the east side of Decatur. The southern branch will continue to follow the Lakewood Gulch channel, crossing under the light rail alignment east of Decatur and continuing along the Gulch to cross under Decatur Street, then turn south, crossing on a short bridge over the Gulch low flow channel, and then continuing south and west to join with the existing bike path alignment in Rude Park. After joining with the existing alignment in Rude Park, the bike path continues along the path documented in the FEIS until after it crosses Federal. There is also an additional short southeastern spur that connects to the existing bike path that parallels Decatur Street to the southeast corner of Rude Park.

In addition, the FEIS assumed that the Gulch would be crossed with only a pedestrian bridge. This alternative would relocate the pedestrian bridge to a point slightly west and convert its use to a bike/pedestrian trail, rather than a pedestrian bridge only.

- ▶ **Federal to Knox:** No change from FEIS
- ▶ **Knox to Tennyson:** No change from FEIS.
- ▶ **Tennyson to Wolff:** In this section the bike path alignment would remain south of the channel and the tracks. The proposed bike/pedestrian bridge over the channel and the tracks would move west about 200 feet. This is relocation, however, and not an additional crossing.

Figure 3-1
Revised Bike Path Routes



- ▶ **Wolff to Sheridan:** There is some change in the bike path alignment in this section to match it with the new bridge and the connecting bike path alignment east of Wolff. The pedestrian bridge at Wolff was replaced with an at-grade crossing (see Section 2.4.11).
- ▶ **Sheridan to Vance:** No change from FEIS.
- ▶ **Vance to Wadsworth:** In the FEIS, the bike path remained on-street west of Vance, and turned north to 14th Avenue to cross Wadsworth at the traffic light. Because of recent TIP funding, Lakewood will construct a new grade-separated bike path crossing at Wadsworth. The crossing would be located on the north side of the tracks. As a result, the bike path would be rerouted to continue straight west along the rail alignment without a detour north as originally shown.
- ▶ **Wadsworth to Kipling:** In the FEIS, the bike path crossed Kipling at grade via a traffic signal at 13th Avenue. Because of recent TIP funding, Lakewood will construct a new grade-separated bike path crossing at Kipling.
- ▶ **Kipling to Oak:** No change.
- ▶ **Oak to Quail:** Based on an agreement between RTD and Lakewood, the bike path was temporarily placed on the south side of RTD right-of-way between Oak and Quail, subject to relocation by the City if required by the LRT project. Keeping the bike path on the south side would require an easement from the existing landowner, and RTD can not secure this easement. Therefore, the Revised Design includes the bike path continuing south on Oak St. from 12th Ave. as an on-street facility until it reaches the Bellow's Park Path and connects to Lakewood's bicycle system.
- ▶ RTD is considering locating the bike route down Oak Street to Collins Avenue or north of the LRT alignment and station/bus area if safety-related concerns can be satisfactorily addressed.

3.6.3 Consistency with Local Bicycle Plans

The City of Golden Bicycle Master Plan (Shapins Associates and Fox Higgins, 2003) describes future planned and programmed projects in the study area. At a September 21, 2006, meeting, RTD reviewed and discussed the proposed LRT alignment in relation to proposed bike paths with City of Golden and Jefferson County officials. There are no impacts to the planned and programmed projects associated with the LRT.

- ▶ Near the Colfax Avenue/6th Avenue interchange, the Bicycle Plan calls for a connection from the north side of 6th Avenue to the north side of Colfax Avenue. Upon review, RTD determined that adequate space exists between the proposed LRT wall and the frontage road running along the south side of Mountainside Estates to accommodate a future bike path. The future wall could be placed at the base of the proposed LRT wall.
- ▶ The Bicycle Plan also designates a future bike path along the south side of 6th Avenue between Simms and Indiana Streets. The future bike path could be placed at the base of the proposed LRT wall.

The Lakewood Bicycle System Master Plan (Ordonez and Vogelsang 2005) acknowledges the future construction of the West Corridor, and notes that the designs “provide a convenient, safe, and efficient link between areas of Lakewood and between Lakewood and Denver.”

Specifically, the plan sites:

- ▶ Replacing the existing D-10 route along 13th Ave where it is disrupted or displaced.
- ▶ Making connections to LRT stations along the corridor.
- ▶ Constructing an over/underpass at Sheridan Blvd so bicyclists don’t have to cross Sheridan Blvd at grade.
- ▶ Over/underpasses for the D-10 route along 13th Ave at Wadsworth Blvd and Kipling Street.
- ▶ Building a bicycle/pedestrian access bridge across 6th Ave to connect the Red Rocks Community College area on the south to the planned station on the north side of 6th Avenue.

The Denver Bicycle Master Plan Update (BRW, 2001) describes a need for a Cowell Public School connection to Martinez Park using the Lakewood Gulch trail. The improvements included with the project do not preclude this connection.

3.7 FREIGHT RAIL IMPACTS

There is no change from the FEIS to this information. The relocation of the Burnham Lead generally remains as documented in the FEIS with minor modifications. An analysis has been done to traffic impacts from these modifications, based on 2030 projections and 2007 traffic counts (see Section 3.4)

3.8 CONSTRUCTION IMPACTS

The proposed underpass under I-70 would result in minor temporary construction and traffic impacts to the interstate.

3.9 SYSTEM LINKAGES

There is no change from the FEIS to this information.

