5 Implementation Plan

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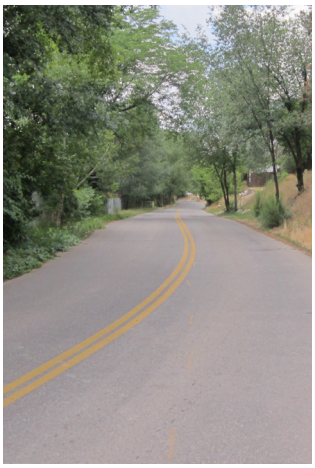

Linden Street: potential advisory bike lane

LOW-HANGING FRUIT PROJECTS

"Low Hanging Fruit" projects are those that are relatively easy or inexpensive to implement. Although some are not listed on the top priority projects list, low hanging fruit projects should be considered for implementation as soon as funding is available to continue momentum and make progress on network implementation.

IMPLEMENTATION PLAN

Implementation Strategies

The projects, programs, and policies recommended in Chapter 4 of this document, if implemented, detail the improvements and changes that will benefit the city over the next 10 to 15 years. This chapter provides guidance on how to make the facility improvements, programs and policies in this document a reality. Not all of these improvements can be made quickly; it will take many years of steady, incremental progress to achieve this vision. This chapter will be a tool to further Glenwood Springs evolution as a multi-modal community by identifying 'low hanging fruit' costs and funding opportunities. Implementation of this plan will take place in small steps over many years. The following strategies will guide the city toward developing and implementing the projects identified in the plan.

Implement inexpensive "**low-hanging fruit**" projects first to gain a more connected bicycle and pedestrian network. Such projects could include:

- Bicycle boulevards in North Glenwood Springs (such as Pine Street, 5th Street, Laurel Street, and Linden Street)
- Bike lanes that require *only* striping to complete (such as Pitkin Avenue, and Midland Avenue from I-70 to 8th Street)

Opportunistically pursue projects such as bike lanes or shoulder bikeways in conjunction with **roadway resurfacing or other maintenance projects** as they occur.

Strategically pursue high-priority projects and programs with local or grant funding.

Incrementally pursue projects based on **available resources** with the goal of eventually completing the project in full.

Incrementally pursue projects based on opportunities associated with **new development.**

Revisit the Long Range Transportation Master Plan every year to evaluate project implementation progress and to review project prioritization and applicability of programs under the current financial environment. Elevate implementation priority for projects that will significantly enhance the transportation network as it matures.

Federal Sources

Federal Formula Grants

The Federal Transit Administration (FTA) apportions certain federal funds based on formulas stipulated in the Moving Ahead for Progress in the 21st Century Act (MAP-21). These formula funds are used only for transit projects. For Glenwood Springs, FTA formula funds flow through CDOT. A locally-based transit program is eligible under the following federal formula grant programs:

- **Surface Transportation Program Funds.** Surface Transportation Program (STP) funds could be an eligible funding source for the City. These funds are referred to as "flexible" because they may be used for an array of eligible projects, including transit. Aside from its highway uses, the STP program can be applied to the capital cost of any public transportation project eligible for grant assistance under the transit title of the U.S. Code (49 U.S.C. Chapter 53 - Public Transportation).
- **Formula Grants for Other than Urbanized Areas (5311)**. Administered through CDOT, eligible recipients may use the funding for capital, operating, administrative expenses for public transportation projects that meet the needs of rural communities; capital projects; operating costs of equipment and facilities for use in public transportation; and the acquisition of public transportation services, including service agreements with private providers of public transportation services.
- **Alternatives Analysis (5339)**. Funds may be used to assist the City in conducting alternatives analyses when at least one of the alternatives is a new fixed guideway systems or an extensions to an existing fixed guideway system.

Federal Discretionary Grants

The federal government awards discretionary grants to states and other eligible recipients through competitive application processes. Unlike formula grants, there is no set allotment for a given geographic area and individual projects compete against other projects nationwide. These programs typically allow for a federal share of up to 80 percent of the project capital cost and require a local match for the remaining 20 percent.

- **National Infrastructure Investments (TIGER).** The Transportation Investment Generating Economic Recovery (TIGER) grant program is a discretionary grant program established under the American Recovery and Reinvestment Act. In theory, TIGER funds may be used for virtually any transportation infrastructure investment that would have a significant impact on the nation, a region, or a metropolitan area. Eligible projects include transit, highways, airports, and freight facilities.

The U.S. Department of Transportation (DOT) administers the TIGER program and may award grants covering up to 80 percent of a project's construction costs, although successful applications in urban areas generally request no more than $20 million and less than 35 percent of project costs from this program. Funds are required to be obligated within two years of award and are typically allocated to projects that have completed the National Environmental Policy Act (NEPA) process.

TIGER is not a statutory program, but given the overwhelming demand for the funding program to date, it is probable that future rounds of funding will be made available. To date there have been six rounds of TIGER funding with announcements on awards for the seventh round expected son. Most TIGER grant projects have been large ($10 million+) projects with a national or interstate commerce benefit.

HUD Discretionary Grants

- **Sustainable Communities Regional Planning (SCRP) Grant Program.** The US Department of Housing and Urban Development offers discretionary grants to local efforts to target housing, economic and workforce development, and infrastructure investments to create more jobs and regional economic activity. These HUD grants have been used for infrastructure projects in the past; however, grants through this program have not been awarded since FY 2011.

State Sources

- **Highway Users Tax Fund (HUTF).** Colorado's Highway Users Tax Fund collects revenues from motor fuel excise taxes, annual vehicle license and registration fees, and passenger-mile taxes on vehicles. Revenues from the fund are disbursed to recipients, including Glenwood Springs, based on a formula prescribed by statute.

- **State Highway Fund (SHF).** The State Highway fund is a subset of the HUTF that is administered by CDOT for the maintenance of the state's highway system. The fund also generates revenue through interest earnings on the fund balance. The SHF can also be used for matching available federal highway construction funding.

- **State General Fund.** The State General Assembly has provided mechanisms that can be used to allocate General Fund revenues for transportation projects, including direct transfers. Another mechanism, passed in 2009 by the General Assembly, creates a trigger of transfers from the General Fund to the HUTF when Colorado personal income grows 5 percent or more in a calendar year.

- **FASTER Transit Grants (Fund transit, safety, and bridge enterprise).** FASTER Transit Grants are awarded by the CDOT Division of Transit and Rail for the purchase of transit vehicles; construction of multimodal stations, and acquisition of equipment for consolidated call centers. Local recipients are required to provide a minimum 20% local match.

- Department of Local Affairs (DOLA). The Local Government Financial Assistance section manages a number of grant and loan programs within the Department of Local Affairs specifically designed to address public facility and service needs. Through coordination and outreach with the department's field offices, grant and loan resources are distributed on both a formula and discretionary basis depending upon applicable state statutory provisions, federal requirements and/or program guidelines.

Local Sources

At the local level, Glenwood Springs could fund the program through existing revenue streams or a variety of other local sources. Options include:

- **City General Fund.** The City could choose to earmark funds from its general fund sources to allocate towards transportation projects.

- **1/2 Cent Street Tax Fund.** Glenwood Springs receives a 1/2 cent sales tax to maintain the City's transportation facilities and plan new transportation initiatives for both vehicles and pedestrians. The tax was raised from 1/4 cent to 1/2 cent in 2006, and is effective until December 31, 2026.

- **2/10 Cent Bus Tax Fund.** The City collects a voter-approved 2/10 cent sales tax with no sunset date to support administration, operations, and capital improvements of the Ride Glenwood Springs transit system.

- **Other Special Sales Taxes.** Revenue from temporary or permanent sales taxes dedicated to transportation uses is increasingly utilized for transportation investments. Special purpose sales taxes can provide funding streams for a variety of programs, and since they are implemented at a city level, they would apply only within the City. This of course would require a public vote. As and example, the City currently has an Acquisitions & Improvements 1 cent sales tax that sunsets on 13-31-18 and will be going to the voters with a reauthorization request next year.

- **Special Assessments.** Special assessments are additional property taxes that are self- imposed on properties close to a new transportation facility or service. They can be used as a dedicated annual revenue stream for funding operations or bonded against under the right set of circumstances. The assessment is levied against parcels in an area that receive a special benefit that can be clearly identified and measured. Implementation of special tax districts can be challenging and before this mechanism can be considered an option, affected local landowners and businesses would need to buy into the premise that the tax is worth the value that the infrastructure or service improvement provides. Nationally, special tax districts are one of the most common forms of value capture for transportation projects.

- **Joint Development.** This refers to the development of a transportation facility and/or adjacent private real estate development, in which a private sector partner: (1) with respect to the transportation facility either provides the facility or makes a financial contribution to offset its costs; and/or (2) incorporates a profit sharing mechanism into the private portion of the project that enables the public sector to share in the private returns. Joint development is more commonly used to provide upfront capital funding, but operations funding based on a lease revenue stream could be considered. There are shopping centers and other large land owners that could donate land or station area amenities to help promote the rider experience at their station stops.

- **Transportation Demand Management Strategies.** Transportation Demand Management (TDM) is the application of strategies and policies to reduce travel demand (particularly, that of the solo-occupant auto) or to redistribute this demand in space or time. There are a number of strategies in the TDM field. Hypothetical TDM strategies include the imposition of parking charges in downtown street locations and parking lots and time limits on downtown parking to ensure more frequent turnover of close-in spaces for shoppers and to encourage all-day parkers to utilize transit instead. Of course, the City would need to weigh the advantages and disadvantages of these programs in the larger context of downtown commercial activity.

- **Private contributions.** These include donations from private entities in exchange for a specific benefit (i.e. advertising). An example would be advertising by local merchants on the outside of a bus. Like naming rights, private sector contributions could potentially be structured to provide a predictable annual revenue stream for funding operations but the magnitude of these payments is likely to be relatively small. Local civic or cultural organizations often contribute funding for sidewalk or park improvements in situations where the organization can be recognized for its contributions with an engraving or placard.

- **Service Purchase Agreements.** Under this approach, an institution or private entity agrees to directly reimburse the transit system for provision or use of the service.

- **Parking Revenues.** The City can use revenues from parking to fund transportation projects. Like naming rights and private contributions, the magnitude of these revenues is likely to be small and unlikely to cover a large portion of costs.

- **SIDs and BIDs.** Special Improvement Districts (SIDs) and Business Improvement Districts (BIDs) are special assessment districts within a city, formed by property and/or business owners as a means of funding and implementing local improvement projects. Establishment of a LID/BID offers low-interest financing, funded through the sale of bonds, for district-wide improvement projects. Incremental assessments are collected over several years for the collective costs of projects in the district. Projects are typically infrastructural and can include construction and maintenance of sidewalks, street lighting, roads, and utility lines. The benefits of SIDs/BIDs are that they provide a means of funding public projects that the City can't fund, they offer project financing for property owners, they spread the costs of projects over all affected property owners, and the owner assessments directly reflect the costs of the projects. The drawbacks of SIDs/BIDs are that they take a significant amount of time to establish and the project approval process can be tedious.

- **Tax Increment Financing (TIF).** A method to use future gains in taxes to subsidize current improvements, which are projected to create the conditions for said gains. The completion of a public project often results in an increase in the value of surrounding real estate, which generates additional tax revenue. Sidewalk and other streetscape improvements are typically popular uses of TIF funding.

Table 5.1: Summary of Preliminary Funding Assessment Sources

Funding Source/Title	Project Types	Eligible Recipients	Funding Approval
Federal Sources			
Rural FTA (§ 5311)	Capital and Operations	CDOT	CDOT
Bus and Bus Facilities (§ 5339)	Capital	Transit Agencies	CDOT
Surface Transportation Program Funds	Capital	CDOT	CDOT
National Infrastructure Investments (TIGER)	Capital	Infrastructure projects with National benefit	U.S. DOT
HUD Sustainable Communities Planning Grants	City Discretion	Projects that spur economic development	HUD
State Sources			
Highway Users Tax Fund (HUTF)	Capital and Operations	Counties, Municipalities, CDOT	Glenwood Springs
State Highway Fund (SHF)	Operations	CDOT	CDOT
State General Fund	Capital	CDOT	CDOT
Local Sources			
City General Fund	City Discretion	City projects if determined eligible	Glenwood Springs
1/2 Cent Street Tax Fund	City Discretion	All city transportation related projects	Glenwood Springs
2/10 Cent Bus Tax Fund	City Discretion	Bus related projects	Glenwood Springs
Other Special Sales Taxes	City Discretion	Determined based on tax measure provisions	Glenwood Springs
Special Assessments	Case by Case - Dependent	Case by Case - Dependent	Glenwood Springs and Assessed Property Owners
Joint Development	Case by Case - Dependent	Case by Case - Dependent	Glenwood Springs and Partnering Property Owners
New Development Assessment Fees	Case by Case - Dependent	Case by Case - Dependent	Glenwood Springs and Assessed Property Owners
Transportation Demand Management Strategies	Case by Case - Dependent	Case by Case - Dependent	Glenwood Springs
Naming Rights	Capital and Operations	Glenwood Springs	Glenwood Springs
Private Contributions/ Support	Capital and Operations	Glenwood Springs	Glenwood Springs
Service Purchase Agreements	Operations	Glenwood Springs	Glenwood Springs
Business Improvement District	Case by Case - Dependent	Case by Case - Dependent	Glenwood Springs
Parking Revenues	Case by Case - Dependent	Case by Case - Dependent	Glenwood Springs

Project Prioritization

A project team composed of the City's Parks & Recreation, Planning & Zoning, River, and Transportation Commissions along with the internal review team completed a prioritization process to help identify infrastructure projects that benefit the Glenwood Springs transportation system the most and best achieve project goals and objectives. Priority projects are those that have a significant value to the community and will have a larger impact to the overall network than simply developing an isolated bike lane or pathway.

Ranking Methodology

The ranking methodology and rating was developed by the project team in conjunction with city staff and the city commissions using a "weight 'em and rate 'em" process of developing ranking criteria, assigning weights to each criteria, and rating each project in relation to the developed criteria.

Scoring and Ranking

The criteria included in Table 5.2 were applied to each project. The project either met or failed to meet the criteria requirements. If the project met the criteria requirements, it was multiplied by the criteria's weight which was established by the review team with commissions input. Then the project's weighted scores for each criteria were added up to give a total score. These total scores were compared, and the projects ranked according to total score. This tool can be used and modified as necessary by the city as additional projects are desired or as criteria emphasis preferences change. It should be noted that this process is a tool to be considered when determining next project priorities, but is not the determining factor in which projects will be constructed in what order. Opportunities to develop projects through any means as they arise should not be wasted even if the project in question does not rate highly in the scoring.

Table 5.2: Summary of Evaluation Criteria and Scoring

Criteria	Description	Weighted Score[1]
Improves safety	Assesses the extent to which the project addresses identified safety problems for any or all modes of travel in Glenwood Springs' transportation system. This criteria would also assess whether a project improves the response time for emergency vehicles and provides alternate evacuation routes.	4.82
Improves connectivity	The project provides a new or improves upon an existing access to job centers, activity centers, neighborhoods, schools, or transit stops, public parks, open spaces and trails, other recreational destinations within and outside Glenwood Springs.	4.82
Transportation efficiency	The project improves the ability of people and goods to travel within and through Glenwood Springs (by auto, by bike or by walking)	4.18
Cost Effectiveness	The project benefits are weighed against the projects costs (including maintenance costs)	4.09
Expands multi-modal options	Assesses the extent to which a project provides transportation alternatives to vehicular travel and the extent to which a project has the ability to improve public health	4.00
Enhances Quality of Life	Assess whether the project preserves or enhances Glenwood's character, whether the project preserves or enhances historic resources, whether the project provides new or enhanced access to parks, open space and lifestyle amenities.	4.00
Reduces congestion	Assesses the extent to which the project helps reduce vehicular congestion on the street system in the short-term or long-term.	3.73
Minimizes impacts to the environment	Assess whether the project minimizes environmental impact, reduces carbon based vehicle miles traveled by reducing the distance between common destinations (by car) or includes facilities for bicycling, walking or transit. The project could also provide infrastructure for alternative or smaller vehicles.	3.64
Ease of implementation	The project is "shovel ready," requires little road reconfiguration or has an existing funding source/project that it can be implemented under.	3.55
Integrates land use goals and plans	Assesses how well the project integrates local and regional land use goals and adopted City and regional planning documents.	3.36
Public Input	The project has gone through a public input process	3.27
Improves Access to Schools	To encourage more students to walk and bicycle to school, proposed facilities that directly connect to or travel within ¼ mile of any school (public, private, primary, secondary, CMC) would qualify for this prioritization criteria.	3.00

[1]Criteria and weighting developed by city council, city commissions, city staff and project team.

Prioritized Improvements

Table 5.3: Prioritized Infrastructure and Network Improvements

Priority	Project Name	Commission Ranking						
		Parks & Rec.	P &Z	River	Trans-portation	Total Score	Total Responses	Average Score
1	8th St Extension	317.67	624.95	822.91	878.51	2,644.04	14	188.86
2	South Bridge	240.65	580.76	743.88	949.32	2,514.61	14	179.62
3	Midland Avenue shared-use path Lowes-Devereux	401.50	486.58	794.11	777.65	2,459.84	14	175.70
4	Relocate Grand Avenue pedestrian bridge to 15th St over the Roaring Fork River	362.58	329.20	800.80	777.87	2,270.45	13	174.65
5	Sunlight Bridge replacement	318.83	508.23	717.44	773.72	2,318.22	14	165.59

Table 5.3: Prioritized Infrastructure and Network Improvements (continued)

Priority	Project Name	Commission Ranking						
		Parks & Rec.	P &Z	River	Trans-portation	Total Score	Total Responses	Average Score
6	Midland Avenue on-street bike facilities	395.95	458.32	812.20	642.11	2,308.58	14	164.90
7	Hwy-6 Corridor shared-use path Laurel - Mel Ray	331.03	426.22	743.99	786.19	2,287.43	14	163.39
8	Wayfinding Map at Two Rivers Park	374.13	451.15	679.88	781.31	2,286.47	14	163.32
9	7th Street Rectangular Rapid Flashing Beacons (RRFB's)	343.57	367.66	709.36	526.73	1,947.32	12	162.28
10	14th Street Multi-modal bridge	171.91	537.68	768.89	788.08	2,266.56	14	161.90
11	Hwy 6 Rectangular Rapid Flashing Beacon (RRFB) at Soccer Field Road bus stop	377.49	459.06	681.10	584.56	2,102.21	13	161.71
12	Blake Ave sidewalk improvements	311.21	411.95	677.71	755.28	2,156.15	14	154.01
13	Mt. Sopris Drive Rectangular Rapid Flashing Beacon (RRFB's) at Midlane Ave	317.85	455.32	669.81	549.55	1,992.53	13	153.27
14	RRFB's Crossing Hwy-6 and 135 Road bus stop	352.21	451.79	636.72	546.38	1,987.10	13	152.85
15	South Blake Ave sidewalk improvements and bike facilities	289.20	481.97	706.28	649.37	2,126.82	14	151.92
16	Bike Boulevard through North Glenwood Springs neighborhood	353.94	220.30	693.30	668.02	1,935.56	13	148.89
17	27th Street and S Grand Ave traffic operations	278.20	419.32	648.42	734.30	2,080.24	14	148.59
18	Donegan Road (GarCo) pedestrian (sidewalk) and bicycle (bike lanes) improvements	331.30	447.96	738.83	552.43	2,070.52	14	147.89
19	7th Street shared roadway	328.30	465.12	763.29	497.20	2,053.91	14	146.71
20	Devereux Road multi-modal bridge	196.09	459.50	712.52	672.53	2,040.64	14	145.76
21	Hwy 6 on-street bike facilities	305.58	427.50	651.92	631.45	2,016.45	14	144.03
22	RRFB crossing Midland Ave at 4 Mile Road	280.03	427.15	646.91	517.37	1,871.46	13	143.96
23	Enhance connection: Two Rivers Park - Glenwood Canyon Recreation Trail	317.56	442.14	733.00	519.12	2,011.82	14	143.70
24	School Street sidewalks	356.67	439.05	690.71	519.35	2,005.78	14	143.27
25	Grade-separated bicycle and pedestrian crossing of SH-82 and 27th Street	330.75	438.86	636.61	551.42	1,957.64	14	139.83
26	27th St side-path	289.39	438.77	647.71	554.18	1,930.05	14	137.86
27	LoVa Trail	210.90	492.04	692.87	521.21	1,917.02	14	136.93

Table 5.3: Prioritized Infrastructure and Network Improvements (continued)

Priority	Project Name	Commission Ranking						
		Parks & Rec.	P &Z	River	Trans-portation	Total Score	Total Responses	Average Score
28	Atkinson Trail connection to Park East Trail	276.00	372.94	707.44	479.87	1,836.25	14	131.16
29	Rio Grande Trail connection at 10th Street	248.73	402.47	695.27	352.33	1,698.80	13	130.68
30	Grade-separated pedestrian crossing of SH-82 at 15th	387.41	384.85	565.42	486.17	1,823.85	14	130.28
31	6th and Laurel pedestrian and bicycle improvements (in conjunction with the Grand Avenue Bridge improvements)	296.02	211.01	685.90	350.78	1,543.71	12	128.64
32	12th St ditch underpass	243.19	315.57	629.24	597.79	1,785.79	14	127.56
33	Rio Grande Trail and 11th St connection	248.73	354.29	662.08	373.68	1,638.78	13	126.06
34	Four Mile Road on-street bike facilities	213.74	363.32	558.98	627.56	1,763.60	14	125.97
35	Colorado River shared-use path (Rivertrail segment)	191.54	343.03	693.98	480.69	1,709.24	14	122.09
36	Grade-separated pedestrian crossing of Grand at 23rd	366.04	284.93	602.70	444.69	1,698.36	14	121.31
37	Rio Grande Trail connection at 14th St	261.64	336.68	655.18	440.96	1,694.46	14	121.03
38	Roaring Fork Bridge Mt Sopris Dr - CR 154	191.46	417.40	597.87	485.15	1,691.88	14	120.85
39	Midland on-street bike facilities 27th - Four Mile Rd	220.45	316.01	727.62	407.12	1,671.20	14	119.37
40	Atkinson Trail to Rio Grande Trail, "22nd St" bridge connection	253.63	276.83	717.24	401.43	1,649.13	14	117.80
41	Coach Miller Dr sidewalk	258.28	336.75	623.81	415.86	1,634.70	14	116.76
42	23rd St and SH-82 intersection improvements	83.27	345.96	694.00	364.05	1,487.28	13	114.41
43	Midland sidewalk 27th to Park West Drive	195.91	330.84	638.89	431.31	1,596.95	14	114.07
44	SH-82 shared-use path to commercial areas	230.20	311.85	657.74	352.14	1,551.93	14	110.85
45	Midland Avenue on-street bicycle facilities	236.92	298.39	631.98	384.58	1,551.87	14	110.85
46	Grade-separated pedestrian crossing of SH-82 at 9th Street	145.09	400.66	599.16	381.21	1,526.12	14	109.01
47	Whitewater Activity Area underpasses	220.11	266.31	644.20	391.35	1,521.97	14	108.71

Cost Estimate Summary

Planning level cost estimates were prepared for 20 ranked on-street and off-street projects resulting from the prioritization process are listed below. The 20 projects were selected by the City as no design data or cost estimates currently exists. Table 5.3 shows a summary of the total opinion of probable cost for each project included in Table 5.3. To assist Glenwood Springs in moving forward quickly with their highest ranking and with additional "low hanging fruit" projects, project information for these projects including costs, notes, distances, and type are found in Appendix G.

Table 5.4: Planning Level Cost Estimates of Staff Selected Projects

Priority	Project	Total Cost
3	Devereux Road Multi-modal bridge	$23,950,000
7	US-6 Corridor East Shared Use Path	$1,930,000
10	14th Street Multi-modal Bridge	$7,578,000
12	Blake Ave. Sidewalk Improvements	$148,000
15	South Blake Ave. Sidewalk Improvements & Bicycle Facilities	$454,000
18	Donegan Road Ped/Bike Improvements	$483,000
23	Enhance Connection Two Rivers Park – Glenwood Canyon Trail	$288,000
24	School Street Sidewalk	$128,000
25	Grade Separated Bicycle and Pedestrian Crossing of SH-82 and 27th St.	$7,240,000
26	27th St. Side Path Connection	$1,248,000
28	Atkinson Trail to Park East Connection	$108,000
30	Grade Separated Pedestrian Crossing of SH-82 at 15th St.	$4,639,000
32	12th Street Ditch Underpass	$1,739,000
34	Four Mile Road On-street Bike Facilities	$11,844,000
35	Colorado River Shared Use Path – River Trail Segment	$2,849,000
36	Grade Separated Pedestrian Crossing of Grand Avenue at 23rd St.	$4,592,000
37	Rio Grande Trail and 14th St. Connection	$35,000
38	Roaring Fork Bridge Mt Sopris Dr - CR 154	$8,339,000
40	Atkinson Trail – Rio Grande Trail Bridge	$1,874,000
41	Coach Miller Drive Sidewalk	$512,000

Planning level cost estimates include likely construction bid items, a 30 percent contingency, construction start-up items, construction engineering, and design. Costs for right-of-way and/or easements (if applicable) are not included. Unit costs for the construction bid items were based on recent actual construction bids, cost data from CDOT and the City of Glenwood Springs, and professional engineering experience. The construction bid item quantities represent planning level assumptions and are not based on design plans.

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