



Recreational and Section 6(f) Resources Technical Report - I-270 Corridor Improvements Environmental Impact Statement

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Acronyms and Abbreviations

Acronym	Definition
CDOT	Colorado Department of Transportation
CFR	Code of Federal Regulations
Commerce City	City of Commerce City
COTREX	Colorado Trails Explorer
CPW	Colorado Parks and Wildlife
Denver	City and County of Denver
DPR	Denver Parks and Recreation
DRCOG	Denver Regional Council of Governments
EIS	Environmental Impact Statement
FHWA	Federal Highway Administration
GIS	Geographic Information Systems
I-25	Interstate 25
I-270	Interstate 270
I-70	Interstate 70
I-76	Interstate 76
ITS	Intelligent Transportation Systems
LWCF	Land and Water Conservation Fund
mph	miles per hour
NEPA	National Environmental Policy Act
NPS	National Park Service
OTIS	Online Transportation Information System
OWJ	Official with Jurisdiction
PCMD	Park Creek Metropolitan District
ROW	Right-of-Way
SCRGP	Sand Creek Regional Greenway Partnership
U.S.	United States
USC	United States Code

1.0 Introduction

The Federal Highway Administration (FHWA) and Colorado Department of Transportation (CDOT) are preparing an Environmental Impact Statement (EIS) to evaluate potential improvements to the Interstate 270 (I-270) corridor. FHWA and CDOT are the lead agencies for this National Environmental Policy Act (NEPA) process, which was initiated in 2020, initially anticipating an Environmental Assessment. Moving into 2023, CDOT determined a more detailed environmental review was needed and requested that an EIS be prepared.

This technical report evaluates and documents potential impacts to and recommended mitigation measures for Recreational and Section 6(f) resources. It supports the analysis and conclusions in the EIS.

1.1 Project Description

I-270 in Colorado is a controlled-access interstate highway with two through lanes in each direction between Interstate 25 (I-25) and Interstate (I-70) in central Denver and Commerce City (Figure 1). It has a posted speed limit of 55 miles per hour (mph). The project limits include the I-270 interchanges with Interstate 76 (I-76), York Street, Vasquez Boulevard, and Quebec Street. The project will tie into the I-25 and I-70 system interchanges, but improvements to these interchanges are part of projects on I-25 and I-70 and will be designed and approved separately.

The purpose of the I-270 Corridor Improvements Project is to implement transportation solutions that modernize the I-270 Corridor to accommodate existing and forecasted transportation demands. The project needs are:

- Traveler safety on the corridor,
- Travel time and reliability on the corridor,
- Transit on the corridor,
- Bicycle and pedestrian connectivity across I-270, and
- Freight operations on the corridor.

In addition to addressing project needs, CDOT, FHWA, and cooperating and participating agencies have established a key project goal: to minimize environmental and community impacts resulting from the project.

Figure 1. I-270 Corridor Improvements Project Limits


2.0 Alternatives

CDOT developed a range of potential alternatives for I-270 improvements. The alternatives ranged from no improvements to minimal infrastructure improvements without added highway capacity to alternatives that added one or two travel lanes in each direction, which could be operated as transit, general-purpose, or Express Lanes.

A two-level alternatives evaluation process was used to screen the alternatives based on the project's purpose and need and goal, and two build alternatives were carried forward for detailed analysis in the EIS:

- Three General-Purpose Lanes Alternative
- Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative

The No Action Alternative is also fully evaluated as a baseline for comparison.

Additional information on the alternatives development and evaluation process is included in the Alternatives Development Technical Report.

2.1 No Action Alternative

The No Action Alternative would maintain the existing highway configuration of two general-purpose travel lanes in each direction. Bridges and pavement would continue to be repaired, but underlying infrastructure deficiencies will remain. The typical section west of Vasquez Boulevard is shown on Figure 2 and east of Vasquez Boulevard is shown on Figure 3. Median and shoulder widths vary in the existing condition and would continue to vary under the No Action Alternative.

Figure 2. No Action Alternative (west of Vasquez Boulevard)

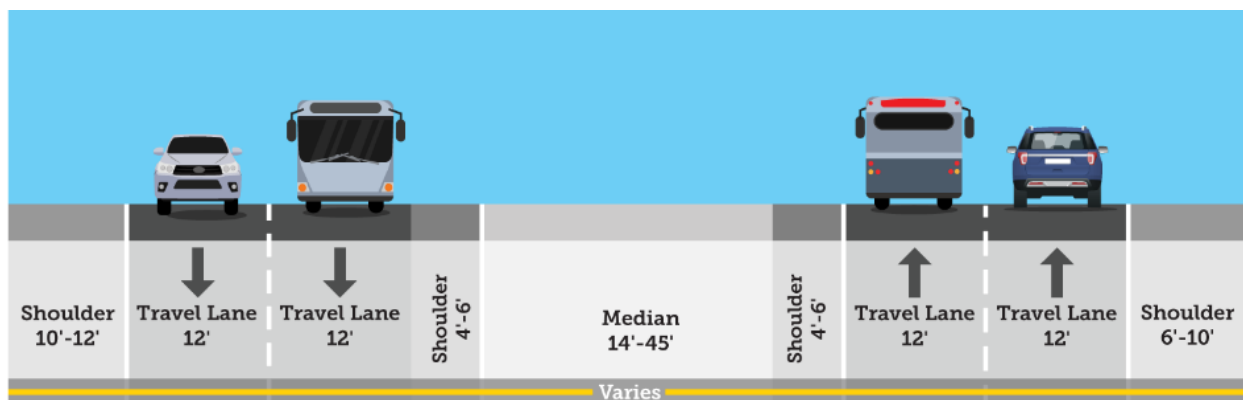
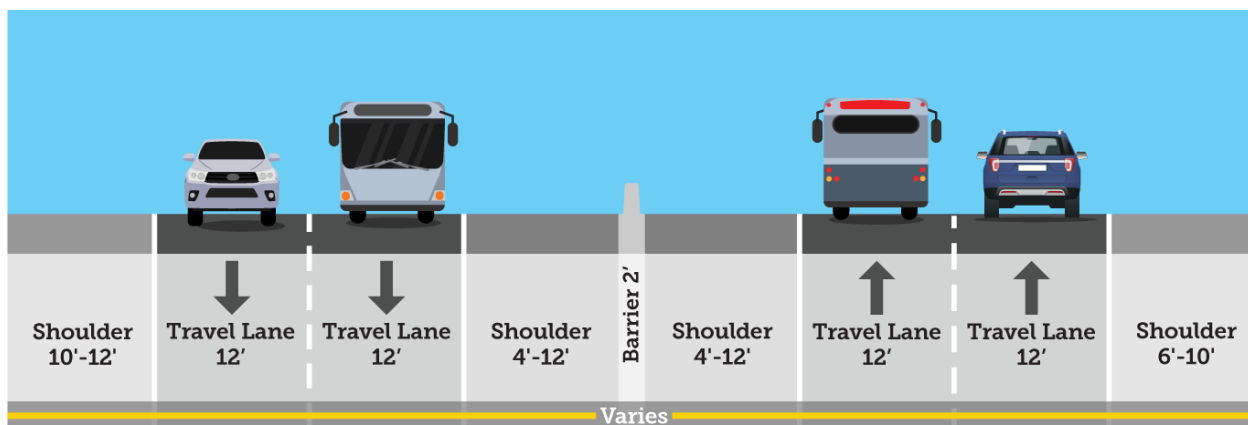


Figure 3. No Action Alternative (east of Vasquez Boulevard)



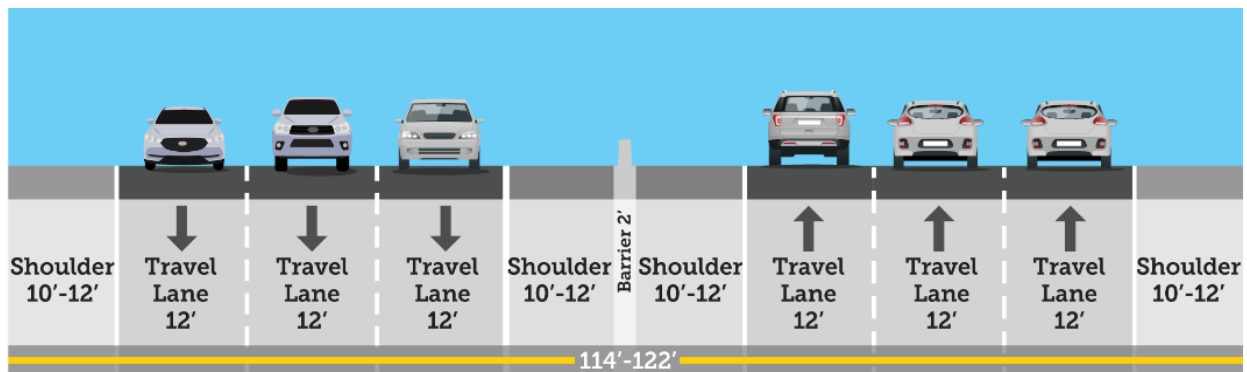
2.2 Build Alternatives

The build alternatives include improving the operational and physical conditions of the I-270 highway; reconfiguring interchanges and ramps; enhancing transit on the corridor; improving bicycle and pedestrian access across I-270; replacing deficient bridges and other infrastructure; and providing modern drainage, water quality, intelligent transportation systems (ITS), and other supporting infrastructure. Both add one new travel lane in each direction and have similar footprints, varying primarily how the additional travel operates.

2.2.1 Three General-Purpose Lanes Alternative

This alternative would reconstruct I-270 to provide three general-purpose lanes in each direction, as shown in Figure 4.

Figure 4. Three General-Purpose Lanes Alternative



This alternative includes:

Mainline Improvements

- Providing three general-purpose lanes in each direction
- Widening shoulders to meet current standards
- Restriping of the westbound I-270 to northbound I-25 off-ramp to provide dual-exit lane capacity
- Adding emergency turnouts and turnaround
- Adding one continuous auxiliary lane in each direction between the I-76 and Vasquez Boulevard on-ramps and off-ramps

Interchange Improvements

- Adding an eastbound collector ramp to consolidate incoming movements from the I-76 on-ramps
- Separating the westbound I-270 York Street and I-76 off-ramps
- Improving the Vasquez Boulevard interchange design with improved westbound on-ramp acceleration lanes and the eastbound off-ramp deceleration lanes
- Improving the Quebec Street interchange ramp acceleration and deceleration lengths

Bridge Improvements

- Reconstructing bridges that are at, or will be reaching, the end of their useful life.
Bridges carrying travel lanes on I-270 include widening to accommodate additional lanes
 - Replacing the existing York Street bridge over I-270 to meet current bridge standards, accommodate an additional travel lane in each direction on York Street, include a 10-foot multi-use path and a 5-foot sidewalk, and enhance lighting
 - Replacing the existing I-270 bridges over the South Platte River Trail to meet current bridge standards, accommodate this project's bicycle and pedestrian improvements on the South Platte River Trail, and enhance lighting
 - Replacing the existing I-270 bridges over the Burlington Ditch to meet current bridge standards, accommodate future bicycle and pedestrian improvements, and enhance lighting
 - Replacing the existing I-270 bridges over Brighton Boulevard to meet current bridge standards, accommodate this project's bicycle and pedestrian improvements on Brighton Boulevard and future bicycle and pedestrian improvements by others, and enhance lighting
 - Replacing the existing I-270 bridges over East 60th Avenue and the BNSF Railway (BNSF) crossing to meet current bridge standards, accommodate future bicycle and pedestrian improvements, and enhance lighting
 - Replacing the existing I-270 bridges over East 56th Avenue to meet current bridge standards, accommodate this project's bicycle and pedestrian improvements, and enhance lighting
 - Replacing the existing Vasquez Boulevard bridge over Sand Creek to meet current bridge standards and accommodate this project's bicycle and pedestrian improvements

Bicycle and Pedestrian Improvements

- Improving the York Street I-270 ramp terminal intersections with crosswalks, curb ramps, and pedestrian indicators at the ramp terminal traffic signals
- Adding a new 5-foot sidewalk on the west side and reconstructing a 6-foot sidewalk on the east side of Brighton Boulevard under I-270
- Reconstructing East 56th Avenue under I-270 and adding an on-street bicycle lane, a 10-foot multi-use path, and 6-foot sidewalk connecting to existing sidewalks
- Improving the intersection at East 56th Avenue and South Sandcreek Drive to include curb ramps, crosswalks, and lighting that meet current standards
- Improving the intersection at East 56th Avenue and Eudora Street to include curb ramps, crosswalks, and lighting that meet current standards
- Adding attached sidewalks on the west side of South Sandcreek Drive. The new sidewalks would be 8 feet wide from Quebec Street to East 47th Avenue Drive and 6 feet wide from East 47th Avenue Drive to East 49th Avenue, with a pedestrian crosswalk across East 47th Avenue Drive connecting the two segments
- Improving wayfinding at key locations, guiding bicyclists and pedestrians to the nearest RTD bus stops, major road connections, or distances to the next trailhead to avoid out-of-direction travel

Trail Improvements

- Reconfiguring the South Platte River Trail crossing under I-270 to improve bicycle and pedestrian visibility around tight curves and increase vertical clearance from the I-270 overpass
- Improving bicycle and pedestrian visibility on the Sand Creek Trail by straightening out tight curves, adding a center stripe, and enhancing lighting at the Vasquez Boulevard bridge over the Sand Creek Trail
- Adding a multi-use path with bicycle and pedestrian underpasses crossing under two free-flow interchange ramps on the east side of Vasquez Boulevard through the interchange with enhanced lighting
- Adding a multi-use path on the east and west sides of the Vasquez Boulevard bridge over Sand Creek, connecting users from the East 56th Avenue and Vasquez Boulevard intersection to a new connection to the Sand Creek Trail
- Adding a multi-use trail spur, connecting the proposed north-south Vasquez Boulevard multi-use trail to the East 56th Avenue and South Sandcreek Drive intersection
- Adding a multi-use path in the southeast corner of East 56th Avenue and South Sandcreek Drive
- Adding a 10-foot-wide bicycle and pedestrian overpass over I-270 and South Sandcreek Drive approximately halfway between East 56th Avenue and Quebec Street

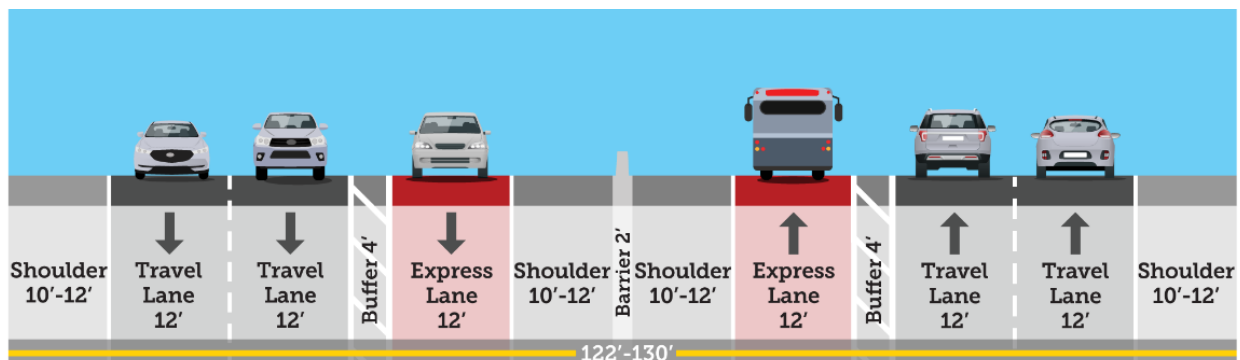
Transit Improvements

Adding four new bus stops with connecting sidewalks and curb ramps on Quebec Street and South Sandcreek Drive near the I-270/Quebec Street interchange to improve access to RTD routes 88 and 37

2.2.2 Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative

This alternative would reconstruct I-270 with two general-purpose lanes and one Express Lane in each direction, as shown in Figure 5. Transit vehicles and high-occupancy vehicles (three or more people) could travel in the Express Lane, free of charge. Other travelers, including freight trucks, who choose to pay a fee could also use the new Express Lane.

Figure 5. Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative



This alternative includes:

Mainline Improvements

- Providing two general-purpose lanes and one Express Lane in each direction that accommodates transit
- Remainder of mainline improvements identified in the Three General-Purpose Lanes Alternative

Interchange Improvements

This alternative includes the same interchange improvements identified in the Three General-Purpose Lanes Alternative.

Bridge Improvements

This alternative includes the same bridge improvements identified in the Three General-Purpose Lanes Alternative.

Bicycle, Pedestrian, Trail, and Transit Improvements

This alternative includes the same bicycle, pedestrian, trail, and transit enhancements identified in the Three General-Purpose Lanes Alternative.

3.0 Context

3.1 Recreational

Adams County (in unincorporated areas), the City of Commerce City (Commerce City), and the City and County of Denver (Denver) conduct the planning, development, and operation of parks and recreation resources within the project area.

3.1.1 Adams County

Adams County Parks, Open Space and Trails Rules and Regulations (Adams County, n.d.) apply to any land designated as part of the County's trail system or open spaces. These rules and regulations are adopted pursuant to the authority granted in Colorado Revised Statutes § 18-9-117 and § 29-7-101(2).

3.1.2 City of Commerce City

Commerce City Ordinances, Rules and Regulations (Commerce City, n.d.) applying to Park Properties are codified under Chapter 7 of the Commerce City Revised Municipal Code. Section 7-1000 defines Park Properties as "All public recreation lands, waters or facilities owned, leased or operated by the City of Commerce City, including, but not limited to, all city parks, trails and open space, all city recreation facilities and the Buffalo Run Golf Course."

3.1.3 City and County of Denver

Denver's Park Use Rules and Regulations (Denver, 2022) are codified under Article 1 of Chapter 39 of the Denver Revised Municipal Code. They apply to Park Facilities, which include Parks, Parkways, Mountain Parks, Recreational Facilities, and other publicly used facilities operated by Denver Parks and Recreation (DPR). Each facility type is defined further under Part II of the Park Use Rules and Regulations.

3.2 Section 6(f)

Section 6(f) of the Land and Water Conservation Fund (LWCF) Act of 1965 is codified in 54 USC §200305(f)(3). State and local governments can obtain grants through the LWCF Program to develop or make improvements to parks and outdoor recreation areas. These properties (referred to as LWCF property) cannot be wholly or partly converted to other than public outdoor recreation uses without the approval of the National Park Service (NPS) pursuant to the LWCF Act and conversion requirements outlined in 36 CFR §59. Colorado Parks and Wildlife (CPW) is the Colorado State Liaison Officer with Section 6(f) authority and facilitates consultation with the NPS.

Section 6(f) applies to all transportation projects involving possible conversions of properties that have been developed or improved with LWCF grants, whether or not federal funding is being utilized for the transportation project (CDOT, 2023).

3.2.1 LWCF Properties

When applying for an LWCF grant, state and local governments must include in the application a boundary map which clearly delineates the area to be subject to Section 6(f) protection. The NPS requires that the proposed LWCF boundary encompass the entirety of the park or recreation area being acquired, developed, or expanded by the applicant. No changes may be made to the LWCF boundary after the grant is awarded unless the boundary is amended as a result of an NPS approved conversion (NPS, 2023).

CPW maintains a geographic information systems (GIS) database of LWCF properties in Colorado which contains polygons representing the official LWCF grant boundary. The database also includes the grant ID, the year the grant was approved, and a description of the recreational improvements that were completed using the LWCF grant. This GIS database is hosted in CDOT's Online Transportation Information System (OTIS) and available publicly.

3.2.2 Conversions

A Section 6(f) conversion is a federal action subject to NPS NEPA processes and compliance with other federal laws (CDOT, 2023). Conversion of LWCF property requires identification of replacement land that is at least equivalent in Fair Market Value and recreational usefulness to the land being converted. 36 CFR §59(b) outlines all prerequisites that must be met in order for NPS to consider a formal conversion request.

3.2.3 Temporary Non-Conforming Uses

According to the LWCF Financial Assistance Manual (NPS, 2023), temporary non-conforming uses (activities other than outdoor recreation) on a portion of LWCF property for fewer than six months may not trigger a conversion if CPW and the NPS determine that the following required criteria are met:

- The size of the LWCF-assisted area affected by any temporary non-recreation use shall not result in a significant impact on public outdoor recreation use. This means that the site of the temporary activity should be sufficiently small to restrict its impact on other areas of a LWCF-assisted area.
- A temporary use shall not result in permanent damage to the LWCF-assisted area, and appropriate measures will be taken to ensure the outdoor recreation area is restored for public recreation use, and there are no residual impacts on the site once the temporary use is concluded.
- No practical alternatives to the proposed temporary use exist.
- The proposal has been adequately reviewed at the state level and has been recommended by CPW.

4.0 Methods

This section describes methods for gathering data on recreational resources and LWCF property and determining impacts as part of the project.

4.1 Data Gathering

Data for existing and planned recreational resources, including spatial data, were gathered in 2020. The following data sources were verified in fall 2024, and the resource inventory was updated with new information, as necessary:

- Local planning documents listed in Section 3.1
- Local agency recreation centers, parks, trails, and open space static maps
- DRCOG GIS data
- Colorado Trail Explorer (COTREX)
- Google Maps
- Adams County GIS data
- Commerce City GIS data
- Denver GIS data
- LWCF property database on CDOT's Online Transportation Information System (OTIS)

4.2 Analysis Approach

Recreational resources within a 0.25-mile buffer ("study area") from the I-270 mainline between I-25 and I-70 are documented in the existing conditions inventory (Figure 6, Figure 7, and Figure 8). The study area was established to capture all possible project alternatives and existing recreational resources that could be directly or indirectly impacted.

This report also evaluates recreational resources for Section 6(f) applicability. Sections 3.2.1 and 3.3.1 define what qualifies recreational resources for Section 6(f) protection. Resources may be considered generally recreational based on local agency designation but not meet the qualifications to be protected under Section 6(f). For each recreational resource discussed under Section 5.0, *Existing Conditions*, there is an explanation of how it does or does not meet the qualifications to be a LWCF property. Coordination with CPW to confirm LWCF grant boundaries is detailed to support the evaluation of Section 6(f) applicability.

This report includes an impact analysis that considers if and how the build alternatives would do the following:

- Impact a recreational resource whether or not the resource qualifies for Section 6(f) protection
- Impact a LWCF property by permanently converting it to a transportation use or having a temporary non-conforming use on the property, as defined in Sections 3.2.1 and 3.2.2, respectively

Resources that overlap with the project limits are considered for direct impacts, while resources within the study area but not overlapping with the project footprint are considered for indirect impacts. The project limits encompass all temporary and permanent impact areas (Figure 6, Figure 7, and Figure 8). Following identification of impacts, mitigation measures are identified and discussed. Additionally, Section 6(f) requirements are discussed, including agency consultation for proposed impacts.

Figure 6. Existing and Planned Recreational Resources, West Section



Figure 7. Existing and Planned Recreational Resources, Central Section



Map Labels:

- Sand Creek Greenway & Trail
- Prairie Basin
- Northfield Trail
- Sand Creek Trail
- Sand Creek Greenway Open Space Parcels
- Northfield Pond Park
- Quebec St
- E 50th Ave
- E 49th Ave
- E 47th Ave Dr
- Spruce St
- Northfield Blvd
- Central Park Blvd
- Interstate 270
- Interstate 70

Legend:

- Study Area (0.25-mile)
- Project Limits
- Existing Parks/Open Space
- Planned Parks/Open Space
- LWCF Property
- Existing Trail
- Planned Trail
- Trailhead
- Trail Access Point
- Benches/Picnic/Scenic Area

Inset Map Labels:

- Arvada
- Denver
- Lakewood
- Aurora
- Rocky Mountain Arsenal National Wildlife Refuge
- Interstate 70

5.0 Existing Conditions

This section summarizes existing and planned recreational resources identified through review of existing data sources, including the following local planning documents:

- Advancing Adams County Parks, Open Space and Trails Master Plan (Adams County, 2022). Developed concurrently with the Comprehensive Plan to guide open space, park, and trail development and management in Adams County. The plan identifies goals and strategies to enhance the Adams County trail network, including better access from trails to open space and county lands, improvements that serve both recreational and transportation uses, and improving the user experience through safety, enhanced wayfinding, and maintenance of adjacent habitat.
- Advancing Adams County Comprehensive Plan (Adams County, 2022). Provides an update to Adams County's 2012 plan by updating policies and land use classifications, and an emphasis on considering all modes of transportation and connections to the County's parks and trails system.
- Adams County Clear Creek Corridor Master Plan (Adams County, 2017). Addresses future improvements to 7 miles of the Clear Creek Trail and 178 acres of adjacent open space within Adams County boundaries. The plan represents public input and makes corridor recommendations, notably improved wayfinding and signage and connections to and from the Clear Creek Trail.
- Commerce City Comprehensive Master Plan (Commerce City, 2010). Guides Commerce City's vision for future development, including parks and recreation. Relevant goals include improving community access to parks, improving amenities in existing parks, such as providing diverse amenities to attract people of different ages and preserving natural resources and tree canopy.
- Commerce City Parks, Recreation and Golf Master Plan (Commerce City, 2024). Outlines needs and goals for a wide range of improvements related to recreation and the community, including identification of facility upgrades, expansion of services and programs, and ensuring financial sustainability.
- Denver Regional Active Transportation Plan (Denver Regional Council of Governments [DRCOG], 2019). Provides a vision for walking and biking in the Denver region to inspire improvements within local jurisdictions. Objectives of the plan include expanding and connecting regional and local bicycle networks, improving bicycle and pedestrian access to transit, and providing access to bicycle and pedestrian networks.
- Game Plan for a Healthy City (Denver, 2019). Provides a vision for developing parks and recreation areas that can be easily accessed in Denver communities. The plan also provides policy direction and regulatory guidance to DPR for expanding and maintaining parks; however, it does not recommend projects or enhancements to specific properties.
- Sand Creek Regional Greenway Trail Denver Segment Master Plan (Denver, 2016). Identifies segments of Sand Creek Greenway needing improvement and proposes future projects within Denver. Proposes improvements from the plan, specifically addresses depleted trail surface conditions due to erosion, flooding, and increased use.

- Walk.Bike.Fit Commerce City, A Multi-Modal Active Transportation Plan (Commerce City, 2012). Proposes improvements to Commerce City’s bicycle and pedestrian network to integrate with the larger network.

Each recreational resource summary is followed by an evaluation of whether that resource is subject to Section 6(f) requirements, as summarized in Table 1. Figure 6, Figure 7, and Figure 8 show all existing and planned recreational resources, and LWCF property boundaries.

5.1 Existing Trails and Trailheads

5.1.1 Clear Creek Trail

The Clear Creek Trail is 23 miles long and primarily hard surfaced, beginning in the City of Golden, and ending at its connection to the South Platte River Trail north of I-76 in Adams County. The trail runs parallel to Clear Creek and crosses under I-270 just east of Colorado State Highway 224. Adams County owns the portion of the trail within the study area, which averages 8 feet in width. The Adams County Colorado Open Space, Parks & Trails Master Plan (Adams County, 2022) identifies the Clear Creek Trail as a “very high priority” trail. While used by commuters, it is primarily a recreational trail, providing users access to adjacent natural areas and connections to other recreational resources (Adams County, 2022).

Established operating hours for recreational facilities in Adams County are 5 a.m. to 11 p.m. which apply to the Clear Creek Trail (Adams County, 2020). There are no formal trailheads or accesses to the Clear Creek Trail within the study area.

5.1.1.1 Section 6(f) Applicability

This segment of the Clear Creek Trail crossing through the study area and project limits is encumbered by LWCF grants (CDOT OTIS, n.d.). It is therefore subject to Section 6(f), requiring consultation with CPW and NPS for any proposed impacts.

5.1.2 South Platte River Trail

The South Platte River Trail is a regional trail for the Denver metropolitan area, running from the City of Brighton to the City of Littleton, approximately 32 miles long. The trail parallels the South Platte River and crosses under I-270, averaging 10 feet in width through the study area (Figure 6). On the south side of I-270, the Sand Creek Trail connects with the South Platte River Trail just west of a pedestrian bridge over the South Platte River, as called out on Figure 6 and shown below in Figure 9. This connection is the only access to the South Platte River Trail within the study area. The Sand Creek Trail is discussed further in Section 5.1.3. The portion of the South Platte River Trail within the study area is owned and managed by Adams County. The Adams County Colorado Open Space, Parks & Trails Master Plan identifies the South Platte River Trail as a regional recreation trail, providing many connections throughout the Denver metropolitan area, including to other local trails (Adams County, 2022). Established operating hours for recreational facilities in Adams County are 5 a.m. to 11 p.m. which apply to the South Platte River Trail (Adams County, 2020).

Figure 9. Connection of Sand Creek Trail to South Platte River Trail



Image looking south from I-270, over the South Platte River Trail, at the Sand Creek Trail connection to the South Platte River Trail. The Sand Creek Trail then crosses the South Platte River via a pedestrian bridge and travels southeast along the Sand Creek. Source: Google Maps

5.1.2.1 Section 6(f) Applicability

As shown in Figure 6, the portion of the South Platte River Trail intersecting the project limits is not LWCF property. However, LWCF property boundaries encompass portions of the trail to the north and south of I-270 outside of the project limits. The Section LWCF property boundaries north and south result from separate LWCF grants acquired by separate local agencies. Furthermore, the LWCF grant boundaries were established at the time to avoid I-270 ROW. Email communication occurred between CDOT and CPW between June 2024 and December 2024 to verify all LWCF property boundaries shown are accurate (Read pers. comm. 2024). Only the portions of the South Platte River Trail that are encompassed by LWCF property boundaries are subject to consultation with CPW and NPS if impacts occur.

5.1.3 Sand Creek Regional Greenway (“Sand Creek Trail”)

The Sand Creek Trail is approximately 13 miles long, beginning at its connection point with the South Platte River Trail east of York Street in Commerce City (Figure 6 and Figure 9), and running southeast to Sand Creek Park at Peoria Street and North Fitzsimmons Parkway in Aurora outside the study area. The trail parallels I-270 and Sand Creek throughout the study area (Figure 6, Figure 7, and Figure 8) and averages 10 feet wide. Open space land, referred

to as the Sand Creek Greenway, occurs adjacent to most of the Sand Creek Trail segment within the study area and is discussed separately in Section 5.2.2. Commerce City owns the portion of the Sand Creek Trail between the South Platte River and just north of East 49th Avenue, and Denver owns the remaining segment at the east end of the project. In addition, Sand Creek Regional Greenway Partnership (SCRGP), a 501(c)3 non-profit organization, maintains the Sand Creek Trail. Established operating hours for recreational facilities in Commerce City are 5 a.m. to 11 p.m. which apply to the portion of the Sand Creek Trail within Commerce City (Commerce City, n.d.). The portion of the trail within Denver does not have restricted operating hours as regional trails within the Denver limits are not subject to a curfew (Denver, 2022).

Commerce City's Parks, Recreation and Golf Master Plan (Commerce City, 2024) identifies the Sand Creek Trail as significant locally and regionally, offering opportunities for recreational activities, including walking, biking, horseback riding, and wildlife viewing. There are multiple sites along the trail offering seating and scenic views of the Sand Creek River. Sites within the study area are included on Figure 6 and Figure 7 and summarized below.

- Benches and trash cans just east of the connection with South Platte River Trail next to the pedestrian bridge over the South Platte River (Figure 6)
- Covered picnic area approximately 0.16 miles west of Brighton Boulevard (Figure 7)
- Benches and trash cans approximately 300 feet west of Vasquez Boulevard (Figure 7)
- Scenic view and seating area approximately 0.45 miles east of Dahlia Trailhead (Figure 7 and Figure 10)

There are two trailheads within the study area which provide access to the Sand Creek Trail. These include the Dahlia Trailhead at the intersection of East 56th Avenue and South Sandcreek Drive (see Section 5.1.4) and the Wetland Park Trailhead at the east end of East 52nd Avenue (see Section 5.1.5). Both offer vehicle parking spaces in an off-street parking lot. In addition to the connection from the South Platte River Trail, there are multiple other Sand Creek Trail access points throughout the study area from local sidewalks and trails. The locations of these are shown on Figure 6, Figure 7, and Figure 8 and summarized below:

- East 64th Avenue near the proposed Burlington Ditch Connector Trail (Figure 6)
- Brighton Boulevard (Figure 7)
- East side of Wetland Park (see Section 5.2.3) via pedestrian bridge (Figure 7 and Figure 13)
- East terminuses of East 47th Avenue Drive, East 49th Avenue, and East 50th Avenue (Figure 8)
- Northbound and southbound Quebec Street (Figure 8)
- Northfield Trail (see Section 5.1.6) terminus southeast of the Quebec Street and I-270 interchange (Figure 8)

Figure 10. Sand Creek Scenic View Area East of Dahlia Trailhead



Image of the scenic view seating area along the Sand Creek River, accessible from the Sand Creek Trail as well as South Sandcreek Drive. Source: sandcreekgreenway.org

5.1.3.1 Section 6(f) Applicability

The trail is not encumbered by LWCF grants and is not subject to Section 6(f).

5.1.4 Dahlia Trailhead (for the Sand Creek Trail)

The Dahlia Trailhead is in Commerce City and accessible from South Sandcreek Drive just east of the intersection with East 56th Avenue and provides access to the Sand Creek Trail (Figure 7). The trailhead offers a paved parking area with marked vehicle spaces and a ramp down to the trail. Events hosted by the SCRGP along the Sand Creek Greenway often utilize the trailhead for parking. Amenities within the trailhead include benches and bike racks (Figure 11). Commerce City owns the trailhead, and SCRGP maintains it. Established operating hours for recreational facilities in Commerce City are 5 a.m. to 11 p.m. which apply to the Dahlia Trailhead (Commerce City, n.d.).

Figure 11. Dahlia Trailhead and Access to Sand Creek Trail



Image looking west from entrance of the Dahlia Trailhead and Sand Creek Trail access point, off South Sandcreek Drive. Visible to the west is where the Sand Creek Trail crosses under East 56th Avenue. Source: Google Maps

5.1.4.1 Section 6(f) Applicability

The trailhead is not encumbered by LWCF grants and is not subject to Section 6(f).

5.1.5 Wetland Park Trailhead (for Wetland Park)

The Wetland Park Trailhead is in Commerce City east of East 52nd Avenue, where it turns into Ivy Street south of I-270 (Figure 7). The trailhead is an access point to the Wetland Park and Loop Trail, providing a paved parking area with marked vehicle spaces (Figure 12). Commerce City owns the trailhead, and SCRGP maintains it. Established operating hours for recreational facilities in Commerce City are 5 a.m. to 11 p.m. which apply to the Wetland Park Trailhead (Commerce City, n.d.).

Figure 12. Wetland Park Trailhead Entrance



Image looking east from entrance of the Wetland Park Trailhead, accessible from where East 52nd Avenue ends before turning into Ivy Street and running south. Source: Google Maps

5.1.5.1 Section 6(f) Applicability

The trailhead is not encumbered by LWCF grants and is not subject to Section 6(f).

5.1.6 Wetland Park Loop Trail

The Wetland Park Loop Trail is a 0.5-mile concrete path within Wetland Park. Wetland Park is located in Commerce City east of East 52nd Avenue, where it turns into Ivy Street and runs south on the south side of I-270 (Figure 7). The Wetland Park Loop Trail connects from the Wetland Park Trailhead on the west side of the property, circulates around a wetland area, and connects to the Sand Creek Trail on the east side of the property just south of a pedestrian bridge over the Sand Creek River (Figure 13). There are picnic shelters and seating areas along the trail, within Wetland Park.

Commerce City owns the Wetland Park Loop Trail, and SCRGP maintains it. Commerce City confirmed in email communication that, while Wetland Park is designated as an open space property, there are recreational amenities in it, including the loop trail and picnic shelters (Ferguson pers. comm. 2021). Established operating hours for recreational facilities in Commerce City are 5 a.m. to 11 p.m. which apply to the Wetland Park Loop Trail (Commerce City, n.d.).

Figure 13. Connection of Wetland Park Loop Trail to Sand Creek Trail near Pedestrian Bridge



Image looking south from South Sand Creek Drive at the pedestrian bridge over Sand Creek, connecting the Sand Creek Trail with the Wetland Park trail system. Source: Google Maps

5.1.6.1 Section 6(f) Applicability

The trail is not encumbered by LWCF grants and is not subject to Section 6(f).

5.1.7 Northfield Trail

The Northfield Trail begins at the Sand Creek Trail south of the eastbound I-270 off-ramp to Quebec Street and heads north along the east side of Quebec Street through the study area (Figure 8). The trail extends northeast of I-270, connecting users of the Sand Creek Trail to Northfield Pond Park and other recreational resources within the Central Park neighborhood. Users of the Northfield Trail can access the Rocky Mountain Greenway Trail to the north, which travels to the Prairie Gateway Open Space and the Rocky Mountain Arsenal Wildlife Refuge outside the immediate project area. Within the study area, Denver owns and maintains the trail, and it averages 10 feet wide. The Denver Moves Bicycle Viewer interactive map on the Denver Moves: Safer Streets Bicycles Program webpage identifies the Northfield Trail as “an off-street, concrete bikeway” (Denver 2021a). The trail is not documented in a formal master plan. Regional trails within the Denver limits are not subject to a curfew and therefore the Northfield Trail does not have restricted hours of use (Denver, 2022).

5.1.7.1 Section 6(f) Applicability

The trail is not encumbered by LWCF grants and is therefore not subject to Section 6(f).

5.2 Existing Parks and Open Space

5.2.1 Sand Creek Greenway

The Sand Creek Greenway constitutes approximately 153 acres of land within the study area, occurring adjacent to the Sand Creek Trail between the east side of the South Platte River and just north of East 49th Avenue (Figure 6, Figure 7, and Figure 8). The greenway parallels I-270 and often occurs directly adjacent to interstate ROW. The entire portion of the Sand Creek Greenway within the study area is owned by Commerce City and maintained by the SCRGP. Commerce City's hours of use apply to this property (see Section 5.1.3).

The Commerce City Parks, Recreation and Golf Master Plan (Commerce City, 2024) identifies the Sand Creek Greenway as open space, important for natural land preservation and habitat conservation, and appropriate for passive recreation. However, active recreation opportunities, such as walking trails are also provided (Commerce City 2024). Recreational trails traversing and amenities within the greenway (benches, picnic areas, and scenic viewing areas) constitute features intended for active recreation. Section 5.1.3 lists amenities adjacent to the Sand Creek Trail and these are also shown in Figure 6, Figure 7, and Figure 8. Established operating hours for recreational facilities in Commerce City are 5 a.m. to 11 p.m. which apply to the Sand Creek Greenway (Commerce City, n.d.).

5.2.1.1 Section 6(f) Applicability

There are no LWCF encumbrances along the Sand Creek Greenway; therefore, it is not subject to Section 6(f).

5.2.2 Veterans Memorial Park and Eagle Pointe Recreation Center

The Veterans Memorial Park and Eagle Pointe Recreation Center property is northeast of the I-270/Vasquez Boulevard interchange between Parkway Drive and East 60th Avenue in Commerce City (Figure 7). The 2.6-acre park located on the property is open to the public and provides a playground, restrooms, and picnic areas (Commerce City, 2021a). The Eagle Pointe Recreation Center is west of the outdoor park on the same property and is also open to the public. Commerce City owns and maintains both Veterans Memorial Park and the Eagle Pointe Recreation Center as recreational facilities. There is onsite parking available for both the park and recreation center via three separate paved parking lots (Figure 13). The recreation center provides a variety of health and fitness services, including gym equipment and classes, a pool and steam room, and racquetball courts. Users are required to purchase a membership or admission fee to use the facility (Commerce City, 2021b). Established operating hours for recreational facilities in Commerce City are 5 a.m. to 11 p.m. which apply to Veterans Memorial Park (Commerce City, n.d.). The Eagle Pointe Recreation Center has separate hours of Monday through Friday from 5 a.m. to 9:30 p.m., Saturdays from 7 a.m. to 7 p.m., and Sundays from 8 a.m. to 6 p.m. (Commerce City 2021a).

Figure 14. Veteran’s Memorial Park and Eagle Pointe Recreation Center



Image looking north at a paved parking area for Veteran’s Memorial Park and Eagle Pointe Recreation Center off East 60th Avenue. The front entrance of the recreation center, park greenspace, and covered picnic tables are visible. Source: Google Maps

5.2.2.1 Section 6(f) Applicability

There is a LWCF property boundary overlapping with the Veterans Memorial Park and the Eagle Pointe Recreation Center property boundary, as shown in Figure 7. The LWCF grant was acquired by Commerce City in 1970 to develop a community park (OTIS, n.d.). Following acquisition of the grant, the NPS established the LWCF property boundary. Only property within the LWCF property boundary is subject to consultation with CPW and NPS if impacts occur.

5.2.3 Leyden Park

Leyden Park is a 0.5-acre park located just north of I-270 on the east side of Leyden Street between East 54th and East 55th Avenues in Commerce City (Figure 7). Commerce City owns and maintains the park and designates it as a community park (Commerce City, 2023). Amenities include a playground and picnic shelters. The park does not have a designated parking area. However, there is street parking available along Leyden Street (Figure 15). Established operating hours for recreational facilities in Commerce City are 5 a.m. to 11 p.m. which apply to Leyden Park (Commerce City, n.d.).

Figure 15. Leyden Park Entrance (Leyden Street)



Image looking east at Leyden Park entrance (with photo taken from Leyden Street). Source: kdvr.com

5.2.3.1 Section 6(f) Applicability

The property is not encumbered by LWCF grants and is not subject to Section 6(f).

5.2.4 Wetland Park

Wetland Park is an approximately 26-acre property located in Commerce City east of East 52nd Avenue, where it turns into Ivy Street and runs south on the south side of I-270 (Figure 7). The property contains a wetland area, a 0.5-mile concrete loop trail (Wetland Park Loop Trail) accessible by a paved trailhead at the southwest corner, and some amenities, including two picnic shelters. The paved trailhead includes spaces for vehicle parking and is accessible from East 52nd Avenue (Figure 12). Trails within the park also provide a connection to the Sand Creek Trail just south of a pedestrian bridge on the east side of the park (Figure 13).

Commerce City owns Wetland Park, and SCRGP maintains it. The Commerce City Parks, Recreation and Golf Master Plan identifies Wetland Park as open space, important for natural land preservation and habitat conservation, and appropriate for passive recreation (Commerce City, 2024). Additionally, Commerce City confirmed in an email that Wetland Park is designated open space and not a recreational park (Ferguson pers. comm. 2021). However, there are features within the property that provide active recreation opportunities, including

walking trails and picnic shelters. Established operating hours for recreational facilities in Commerce City are 5 a.m. to 11 p.m. which apply to Wetland Park (Commerce City, n.d.).

5.2.4.1 Section 6(f) Applicability

Wetland Park is not encumbered by LWCF grants and is therefore not subject to Section 6(f).

5.2.5 Northfield Pond Park

Northfield Pond Park is adjacent to the I-270 ROW to the northeast of the I-270/Quebec Street interchange, and Denver owns it (Figure 8). The property is approximately 31 acres and contains natural wetland habitat, benches, and both paved and unpaved trails. There are multiple access points to Northfield Pond Park along the eastside from Yosemite Street (Figure 16) and from the Northfield Trail which traverses the west and south sides of the property. The Northfield Trail is discussed in Section 5.1.6. Northfield Pond Park does not have an established parking area, and streets immediately adjacent to the property do not appear to allow street parking. The southern edge of the park is adjacent to I-270 ROW with a fence delineating the park boundary.

Denver's parks GIS database indicates that the property was formally designated as a park in 2017 (Denver, 2024).

Established operating hours for recreational facilities in Denver are 5 a.m. to 11 p.m. which apply to Northfield Pond Park (Denver, 2022).

Figure 16. Northfield Pond Park East Entrance



Image looking west from Yosemite Street and East 47th Avenue at the eastside of Northfield Pond Park. A marked entrance is visible, including trash cans, benches, park sign, and a perimeter trail. Source: Google Maps

5.2.5.1 Section 6(f) Applicability

The property is not encumbered by LWCF grants and is therefore not subject to Section 6(f).

5.2.6 Prairie Basin

Prairie Basin is located along the west side of Trenton Street from East 49th Place to Uinta Street in Denver (Figure 8). Prairie Basin is one of the larger recreational properties serving the Central Park neighborhood at nearly 31 acres. There are access points via sidewalks from all sides of the property including from the Northfield Trail which traverses along the west and north edges. However, there is no established vehicle parking area. Amenities within the property include picnic tables (Figure 17), benches, and public art. Established operating hours for recreational facilities in Denver are 5 a.m. to 11 p.m. which apply to Prairie Basin (Denver, 2022).

The Denver Real Property map (Denver n.d.-b) lists Park Creek Metropolitan District (PCMD) as the owner of the Prairie Basin property which Tammi Holloway, the district contact, confirmed via email (Holloway pers. comm. 2024). A PCMD parks map was not available for reference, and the property is not shown on Denver's Parks map, located on denvergov.org (Denver, n.d.-b). A separate parks GIS database published by Denver on ArcGIS Online and labeled as authoritative lists the property, indicating it is designated as open space (Denver 2024). Contacts with DPR and PCMD were unable to locate an official master plan.

Figure 17. Prairie Basin East Access Point and Picnic Area



Image looking west from Trenton Street at a marked access point to Prairie Basin, including a sign, picnic tables, streetlights, and a perimeter trail. Source: Google Maps

5.2.6.1 Section 6(f) Applicability

The property is not encumbered by LWCF grants and is not subject to Section 6(f).

5.3 Planned Resources

5.3.1 Burlington Ditch Connector

The Burlington Ditch Connector is a planned greenway trail that would extend nearly 8 miles from the Sand Creek Trail and South Platte River Trail junction along the O'Brian/Burlington Ditch Road to East 104th Avenue outside the project limits (Figure 6). The future trail is identified in Walk.Bike.Fit Commerce City: A Multi-Modal Active Transportation Plan as a priority trail segment of the Northern Range Loop Trail (Commerce City 2012). In addition, the Advancing Adams County Parks, Open Space and Trails Master Plan lists the future Burlington Ditch Connector as a proposed “mid-term priority trail” (Adams County 2022). Commerce City confirmed in an email that it does not have funding or a timeline for construction of the section of the proposed Burlington Ditch Connector in the study area, the Farmers Reservoir and Irrigation Company currently owns the land, and it is not open to the public (Ferguson pers. comm. 2023).

5.3.1.1 Section 6(f) Applicability

The land does not currently contain LWFC grants and would not qualify because of it being privately owned.

5.3.2 Sand Creek Greenway Open Space Parcels

The Denver Parks GIS database contains three proposed parcels adjacent to the Sand Creek Trail between Quebec Street and Central Park Boulevard designated as future Sand Creek Greenway open space, as called out in Figure 8 (Denver 2024). The parcels total approximately 44 acres and are currently owned by Denver. These parcels are indicated in the database as currently undeveloped land and slated for future proposed greenway development. Owen Wells, the DPR City Planning Manager, confirmed in an email that the parcels are currently undeveloped and will likely serve as primarily natural open space along the Sand Creek, but that there are currently no formal plans for construction (Wells pers. comm. 2024).

5.3.2.1 Section 6(f) Applicability

None of these parcels currently contain LWFC grants for development.

Table 1. Summary of Section 6(f) Applicability for Existing and Planned Recreational Resources

Resource Name	Official(s) With Jurisdiction	LWCF Property?
Clear Creek Trail (Figure 6)	Adams County Parks, Open Space & Cultural Arts	Yes
South Platte River Trail (Figure 6)	Adams County Parks, Open Space & Cultural Arts	Yes - LWCF property boundary within study area No - LWCF property boundary not within project limits
Sand Creek Trail (Figure 6, Figure 7, and Figure 8)	Commerce City Parks, Recreation and Golf; SCRGP; DPR	No
Dahlia Trailhead (Figure 7)	Commerce City Parks, Recreation and Golf; SCRGP	No
Wetland Park Trailhead (Figure 7)	Commerce City Parks, Recreation and Golf; SCRGP	No
Wetland Loop Trail (Figure 7)	Commerce City Parks, Recreation and Golf; SCRGP	No
Northfield Trail (Figure 8)	DPR	No
Sand Creek Greenway (Figure 6, Figure 7, and Figure 8)	Commerce City Parks, Recreation and Golf; SCRGP; DPR	No
Veteran's Memorial Park and Eagle Pointe Recreation Center (Figure 7)	Commerce City Parks, Recreation and Golf	Yes, portions
Leyden Park (Figure 7)	Commerce City Parks, Recreation and Golf	No
Wetland Park (Figure 7)	Commerce City Parks, Recreation and Golf; Sand Creek Regional Greenway Partnership	No
Northfield Pond Park (Figure 8)	DPR	No
Prairie Basin (Figure 8)	DPR	No
Planned Resource - Burlington Ditch Connector (Figure 6)	Commerce City	No

Resource Name	Official(s) With Jurisdiction	LWCF Property?
Planned Resource - Sand Creek Greenway Open Space Parcels (Figure 8)	DPR	No

6.0 Impacts Assessment

This section assesses impacts to recreational resources intersecting the project limits (Figure 6, Figure 7, and Figure 8) that would result from the No Action Alternative and each build alternative and proposes mitigation. For resources subject to Section 6(f), this section includes a determination of use and discussion of required and completed agency consultation.

The following recreational resources discussed in Section 5.0 are outside of the project limits and would not be impacted by the project:

- Veteran's Memorial Park and Eagle Pointe Recreation Center
- Leyden Park
- Wetland Park
- Wetland Park Loop Trail
- Wetland Park Trailhead
- Northfield Pond Park
- Prairie Basin

Table 2 at the end of this section provides a summary of recreational impacts, and Section 6(f) use determinations for all resources identified in Section 5.0.

6.1 No Action Alternative

The No Action Alternative would not have impacts to recreational or LWCF property.

6.2 Build Alternatives

Impacts to recreational and LWCF property would be the same under the Three General-Purpose Lanes Alternative as under the Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative. Impacts would occur to three trails, including the South Platte River Trail, the Sand Creek Trail, and the Northfield Trail, as well as the Dahlia Trailhead. There is the potential for impacts to the Clear Creek Trail which is a LWCF property; however, impacts would be avoided with implementation of mitigation.

6.2.1 Clear Creek Trail

6.2.1.1 Recreational Impacts

While the Clear Creek Trail intersects the project limits under I-270 just west of the I-270/I-76 interchange (Figure 6), impacts to the trail would not occur as a result of the build alternatives. The existing I-270 bridges over Clear Creek are wide enough to accommodate additional proposed lanes along I-270 and do not need to be replaced. Additionally, there is no preventative maintenance proposed to the bridges. Improvements along I-270 above the trail would constitute roadway resurfacing and lane reconfiguration via striping and could be completed within the limits of the roadway. There is potential for temporary impacts to occur via trail closures due to falling debris from overhead construction activities. However, this

impact will be avoided with protective measures during construction. Therefore, no recreational impacts would occur to the Clear Creek Trail.

6.2.1.2 Section 6(f) Use of the Clear Creek Trail

NPS submitted a letter dated September 16, 2024, as a response to the project's Notice of Intent to prepare an EIS (Attachment A). The letter states the project may potentially impact the Clear Creek Trail, which is an LWCF property, and that any alterations to the property must be approved by NPS. Since the project would not result in a use of the trail, it was determined that coordination with CPW and NPS is not required as a result of the letter.

Because no impacts would occur to the Clear Creek Trail, there would not be a Section 6(f) use.

6.2.2 South Platte River Trail

6.2.2.1 Recreational Impacts

An approximately 500-foot-long segment of the South Platte River Trail approaching and crossing under I-270 would be temporarily closed to accommodate the replacement of the I-270 bridges over the South Platte River. Additionally, approximately 900 feet of the trail would be reconstructed to address geometric safety concerns along the trail. The proposed alignment will be designed to current standards, improve blind curves, and increase vertical clearances under I-270 (Figure 18). Spur connections from the new trail alignment to the Sand Creek Regional Greenway pedestrian bridge will be provided. The spur to be constructed south of the pedestrian bridge will provide access to the pedestrian bridge that is designed to current standards. The spur to be constructed north of the pedestrian bridge will provide access to the pedestrian bridge but will not meet current standards, matching existing grades. Temporary easements overlapping the trail are needed to construct the proposed trail improvements. Adams County's trail specifications would be incorporated into the design for all trail improvements areas.

A temporary trail would be constructed to maintain access along the South Platte River Trail, and Figure 18 shows two options for temporary trail alignments. Option A would detour trail users closer to the South Platte River, away from the bridge abutments and permanent trail realignment. Option B would detour trail users closer to the existing abutment by installing a temporary concrete barrier or shoring to protect pedestrians and bicyclists. Either temporary trail option would be constructed prior to beginning bridge girder installation, to ensure adequate vertical clearance is maintained between the temporary trail and the bottom of the new girders. Protective measures would be in place to protect trail users along the temporary trail from construction activities required to construct the new bridge and trail. Flaggers and signage would be utilized to manage bicyclists and pedestrians if the temporary trail cannot be constructed to the minimum standard width to accommodate both users. Additionally, flaggers would be utilized if construction activities, such as moving equipment across the trail, require a short closure (no more than 15 minutes) and management of trail traffic. Signage would be installed at strategic locations along and off the trail that would clearly communicate the expected construction timeline, closure and detour areas, and would be regularly maintained to ensure the information remains accurate and up to date. Strategic

locations include access points, parking areas, trailheads, and points at which the trail enters and exits the project area.

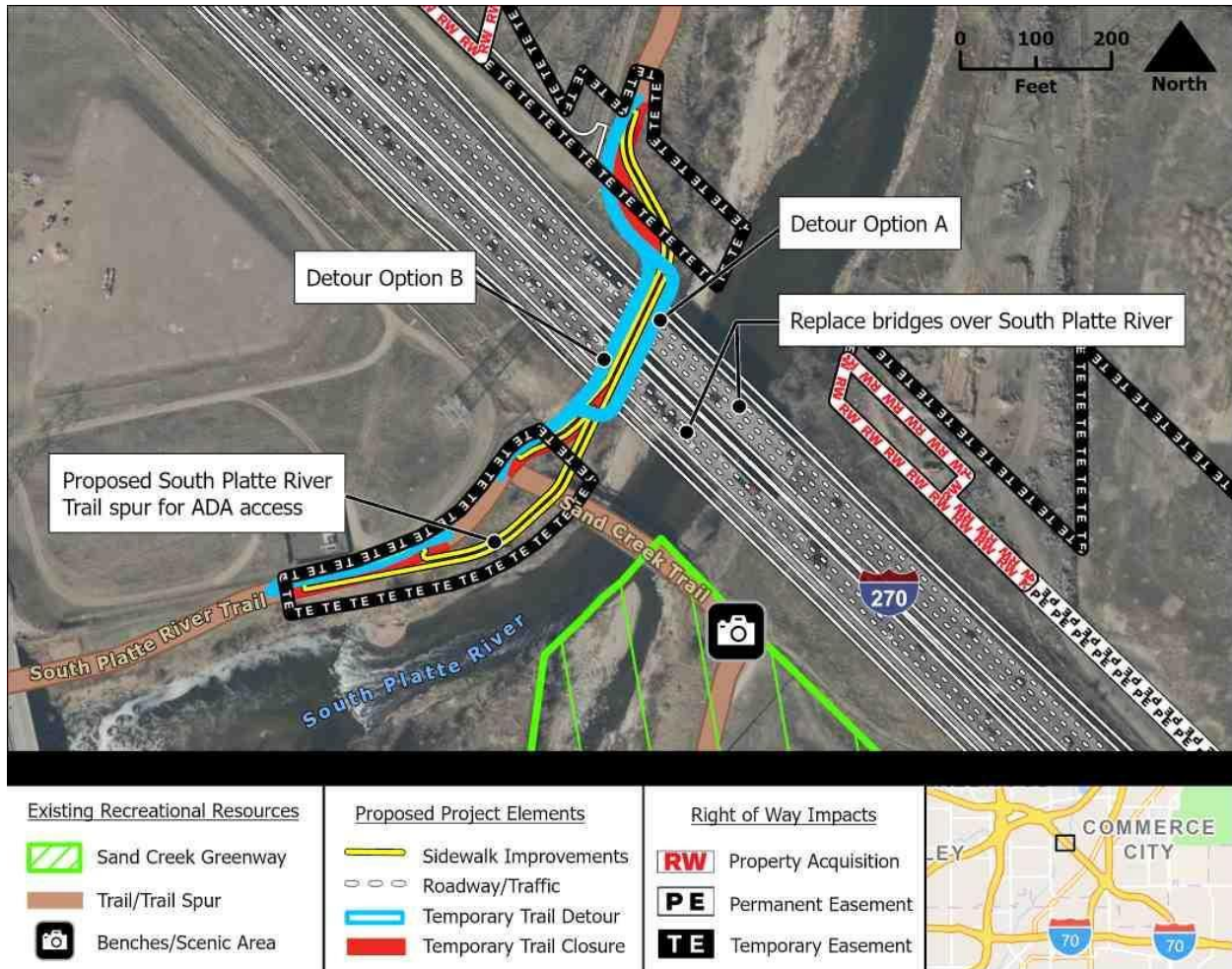
Several overnight closures of the temporary trail would be required to accommodate placement of the bridge girders, and trail users would not be able to travel under I-270 during these times for safety reasons. These overnight closures would occur outside established trail operating hours of 5 a.m. to 11 p.m., and full access along the temporary trail would be restored during established operating hours. The OWJ and the public would be notified at least two weeks prior to overnight closures. During overnight closures, signage would be placed at the nearest trail access points to inform users. This signage would be removed when construction activities allow safe use of the trail, and no later than 5 a.m. daily.

All disturbed segments of the South Platte River Trail and areas around the trail would be restored following construction at this location.

A meeting occurred between CDOT and Adams County Parks, Open Space & Cultural Arts representatives on February 4, 2021, to discuss the project impacts and proposed mitigation (Adams County pers. comm. 2021). Adams County later reviewed and signed a Section 4(f) concurrence request letter with this information (see Section 6.2.2.2).

6.2.2.2 Section 6(f) Use of the South Platte River Trail

Portions of the South Platte River Trail north and south of I-270 are encompassed within a LWCF property boundary as described in Section 5.1.2.1 and shown in Figure 6. All proposed construction activities would occur on a portion of the trail that is not Section 6(f) protected. Email coordination occurred between CDOT and CPW to disclose the proposed activities, including the overnight closures of the trail. CPW confirmed there would not be a Section 6(f) use of the South Platte River Trail (Read pers. comm. 2024).

Figure 18. South Platte River Trail Impacts at I-270


6.2.3 Sand Creek Trail and Greenway

6.2.3.1 Recreational Impacts

There would be impacts to multiple segments of the Sand Creek Trail and areas of the Greenway between the pedestrian bridge over the South Platte River (Figure 6) and a location approximately 0.75-mile east of Dahlia Trailhead (Figure 7). All impacts would occur within Commerce City’s jurisdiction, and there would be no impacts to the Denver-owned portion of the Sand Creek Trail within the study area. Location-specific impacts and mitigation are discussed in the sections below.

Meetings occurred between CDOT and the OWJs for the Sand Creek Trail in early 2021 to discuss the project impacts and proposed mitigation. A meeting occurred with both Commerce City and the SCRGP on January 26, 2021, (Commerce City; SCRGP pers. comm. 2021) and with SCRGP only on February 1, 2024 (SCRGP pers. comm. 2021). A letter was sent to the OWJs via email on October 9, 2024, providing an updated description of project impacts and representing a notice of intent to make a Section 4(f) *de minimis* finding.

Sand Creek Trail and Greenway at Burlington Ditch:

- Sand Creek Trail: An underground pipe outfall is proposed to be installed directly east of the Burlington Ditch under the trail. The pipe outfall would extend from I-270 to Sand Creek, within the permanent easement footprint shown in Figure 19. Approximately 100 feet of the Sand Creek Trail is within proposed temporary and permanent easements needed for construction and future maintenance of the outfall (Figure 19). The work would be completed in a manner that would allow trail continuity to be maintained within the established operating hours of 5 a.m. to 11 p.m. Additionally, flaggers would be utilized if construction activities, such as moving equipment across the trail, require a short closure (no more than 15 minutes) and management of trail traffic.
- Sand Creek Greenway: Directly west of the Burlington Ditch, an area of the Greenway approximately 1 acre in size would be used for construction staging, requiring acquisition of a temporary easement (Figure 20). Directly east of the Burlington Ditch, an underground pipe outfall from I-270 to Sand Creek would be installed, requiring a permanent easement of approximately 1 acre for future access and maintenance (Figure 19). Additionally, temporary easements from the greenway would be required to accommodate installation, totaling approximately 0.30 acres. All disturbed areas of the Greenway would be restored following construction of the project.

Figure 19. Sand Creek Trail and Greenway Impacts East of Burlington Ditch

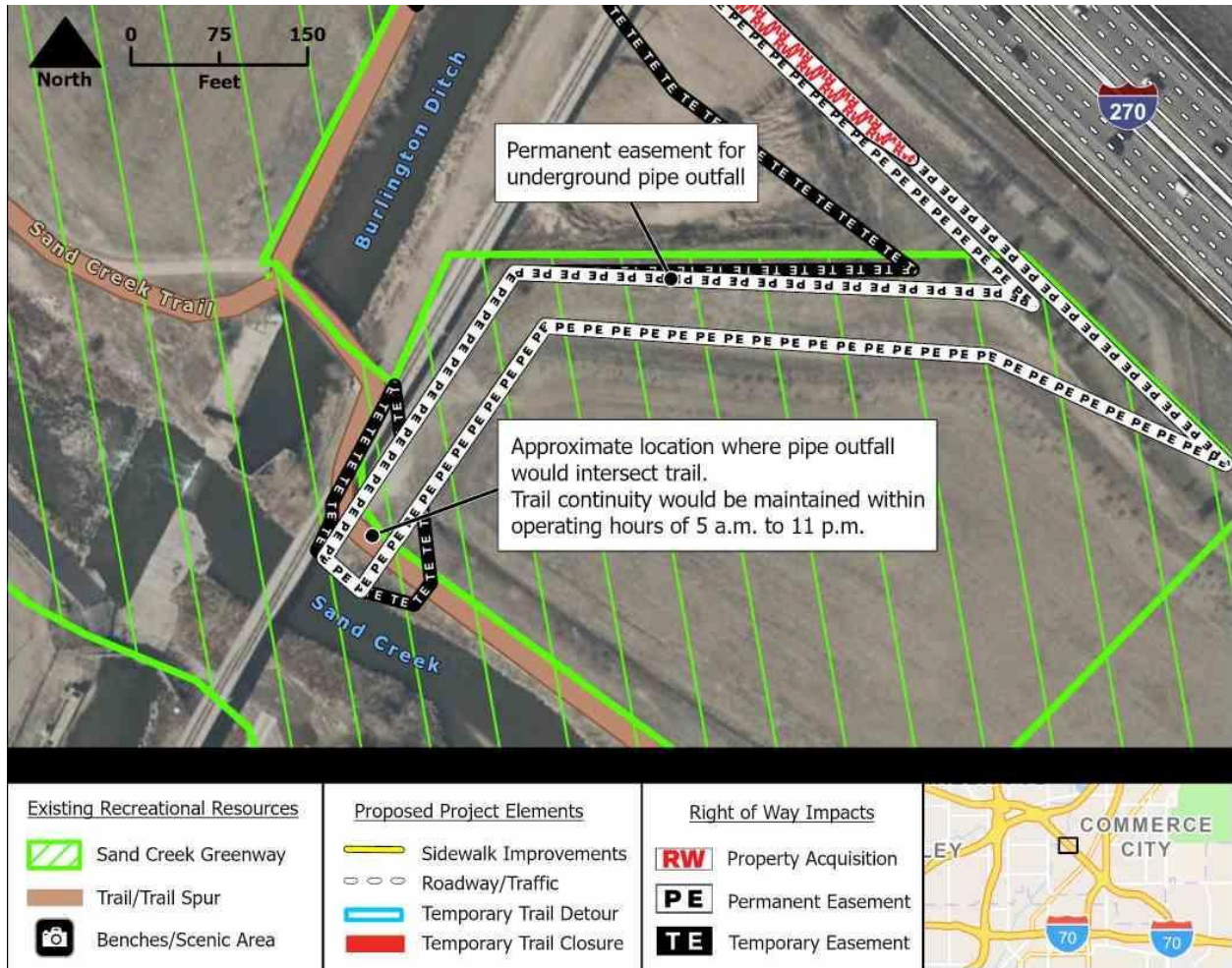
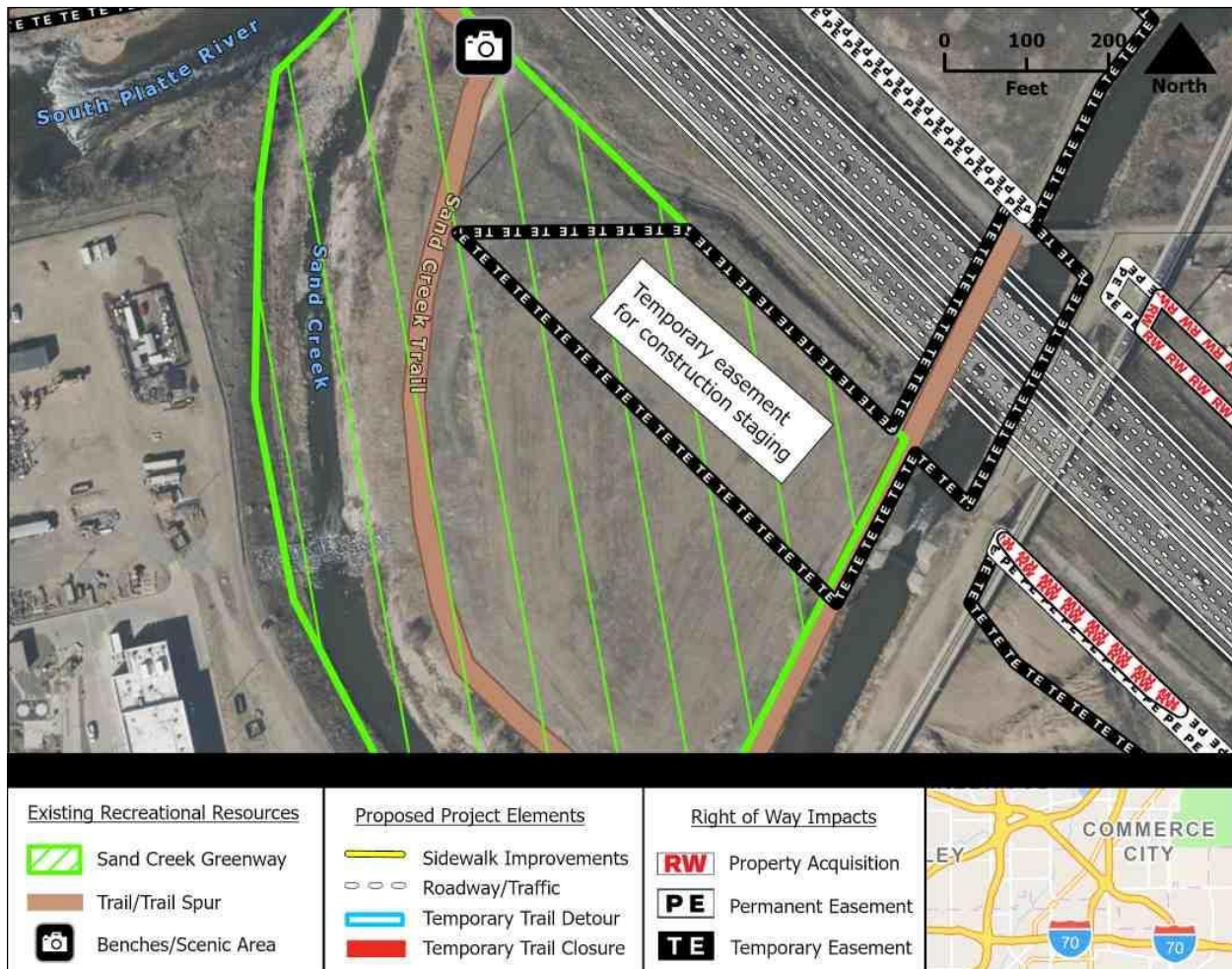


Figure 20. Sand Creek Trail and Greenway Impacts West of Burlington Ditch



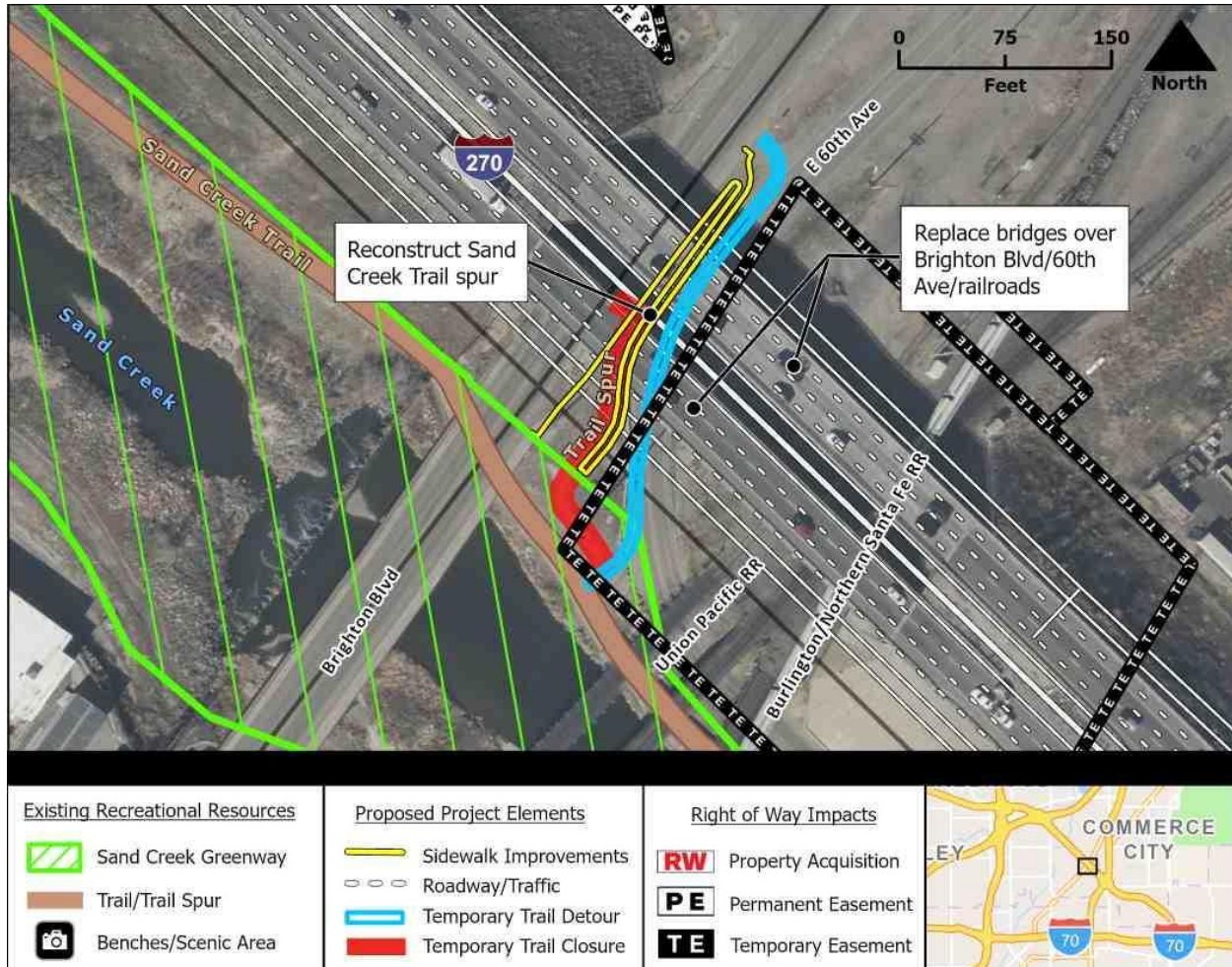
Sand Creek Trail and Greenway at Brighton Boulevard/East 60th Avenue:

- Sand Creek Trail: A spur trail providing a connection to the Sand Creek Trail from Brighton Boulevard would be temporarily closed during replacement of the I-270 bridges that span over Brighton Boulevard, East 60th Avenue, and the Union Pacific and Burlington/Northern Santa Fe Railroads (Figure 21). The spur trail is in close proximity to existing bridge piers to be removed and reconstructed, creating a need to close the trail temporarily during bridge construction. Additional work requiring the temporary spur trail closure includes reconstruction of an existing retaining wall along the west side of the spur trail to accommodate the new bridge pier locations. The spur trail would be reconstructed and its connection to Brighton Boulevard would be improved as part of the project.
- East 60th Avenue is further away from existing piers than the spur trail which provides a safe and feasible location for a trail detour. Therefore, to maintain access from Brighton Boulevard to the Sand Creek Trail, a temporary trail would be constructed to detour trail users onto East 60th Avenue by installing a temporary concrete barrier to protect pedestrians and bicyclists, installing temporary pavement on the east side of East 60th Avenue, and shifting vehicle traffic onto the temporary pavement to accommodate

vehicle traffic. In addition, signage would be placed strategically along East 60th Avenue to warn oncoming drivers about the change in roadway configuration. The spur trail would be reopened following construction in this area.

- Sand Creek Greenway: A temporary easement totaling approximately 0.07 acres would be needed from the Greenway to reconstruct the tie in of the spur trail to the Sand Creek Trail (Figure 21). All disturbed areas of the Greenway would be restored following construction of the project.

Figure 21. Spur to Sand Creek Trail Impacts at Brighton Boulevard/East 60th Avenue



Sand Creek Trail and Greenway at Vasquez Boulevard:

- Sand Creek Trail: Approximately 470 feet of the trail approaching and crossing under Vasquez Boulevard would be temporarily closed to accommodate the replacement of the Vasquez Boulevard bridge over Sand Creek and installation of new, 10-foot-wide sidewalk connections between Sand Creek Trail and the east and west sides of Vasquez Boulevard (Figure 22). The west sidewalk connection would be constructed within transportation ROW; however, the east sidewalk connection requires a temporary easement for construction and permanent easement for maintenance of the new sidewalk. Approximately 60 feet of the Sand Creek Trail is within the proposed permanent easement where the new sidewalk connection would tie into the trail.

Temporary trails would be constructed to maintain access along the Sand Creek Trail. Figure 22 shows two options for temporary trail alignments under the Vasquez Boulevard bridge. Option A would detour trail users closer to Sand Creek, away from the bridge abutments and Option B would detour trail users closer to the existing abutment by installing a temporary concrete barrier or shoring to protect pedestrians and bicyclists. Either temporary trail option would be constructed prior to beginning bridge girder installation to ensure adequate vertical clearance is maintained between the temporary trail and the bottom of the new girders. Protective measures would be in place to protect trail users along the temporary trail from construction activities required to construct the new bridge and trail. Flaggers and signage would be utilized to manage bicyclists and pedestrians if the temporary trail cannot be constructed to the minimum standard width to accommodate both users. Additionally, flaggers would be utilized if construction activities, such as moving equipment across the trail, require a short closure (no more than 15 minutes) and management of trail traffic.

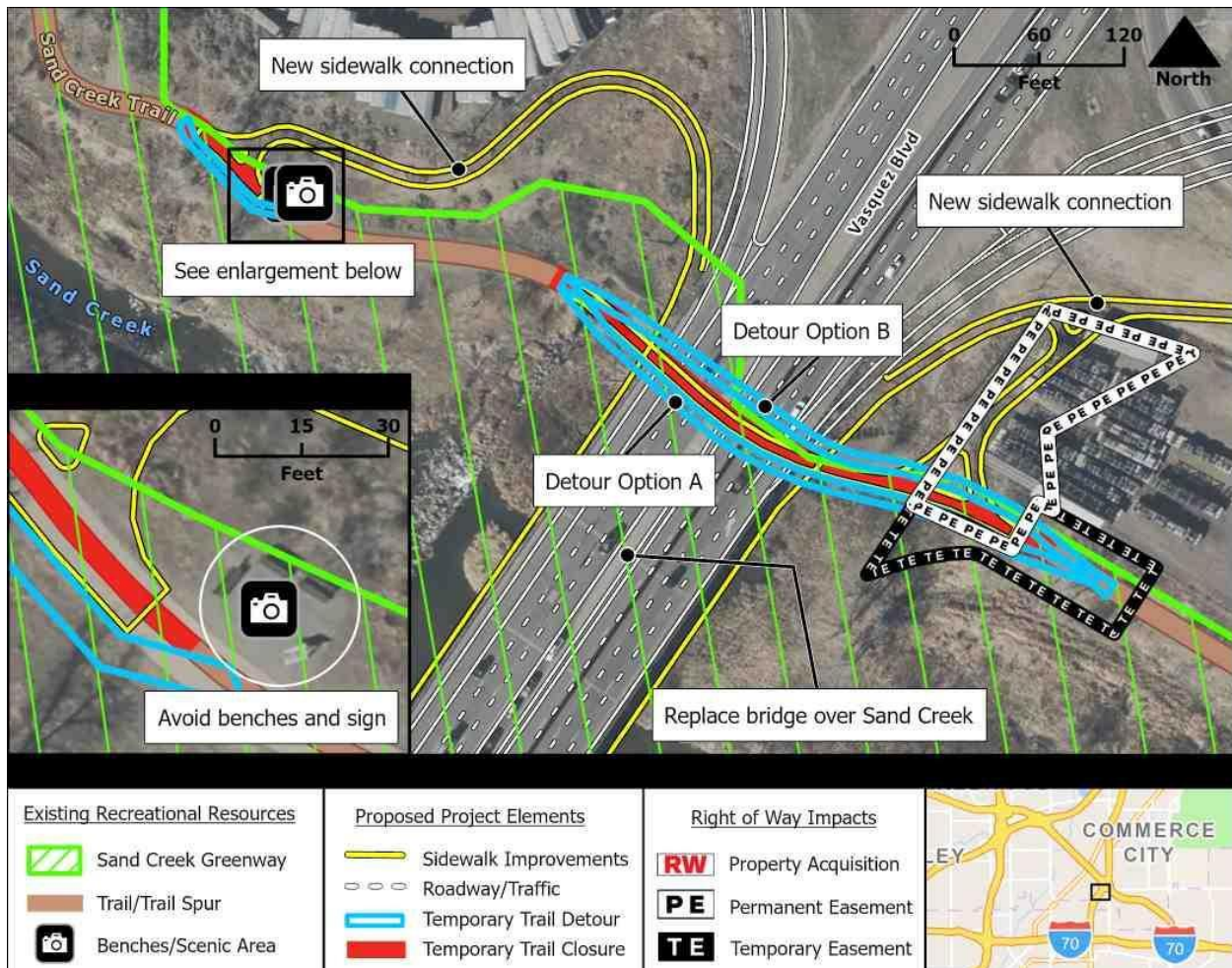
Several overnight closures of the temporary trail under the Vasquez Boulevard bridge would be required to accommodate placement of the bridge girders, and trail users would not be able to travel under Vasquez Boulevard during these times for safety reasons. These overnight closures would occur outside established trail operating hours of 5 a.m. to 11 p.m., and full access along the temporary trail would be restored during established operating hours. The OWJs and the public would be notified at least two weeks prior to overnight closures. During overnight closures, signage would be placed at the nearest trail access points to inform users. This signage would be removed when construction activities allow safe use of the trail, and no later than 5 a.m. daily.

The trail would be restored in the original alignment and reopened following construction at this location.

- Sand Creek Greenway: The Greenway would be temporarily disturbed to construct temporary detour trails for the Sand Creek Trail. Additionally, a temporary easement of approximately 0.40 acres and a permanent easement of approximately 0.20 acres would be acquired from the Greenway adjacent to the new sidewalk connection from the east side of Vasquez Boulevard (Figure 22). All disturbed areas of the Greenway would be restored following construction of the project.

The benches and sign located within the Sand Creek Greenway approximately 300 feet west of Vasquez Boulevard would not be impacted by the proposed new sidewalk connection and would not be disturbed by construction activities (Figure 22).

Figure 22. Sand Creek Trail and Greenway Impacts at Vasquez Boulevard



Sand Creek Trail and Greenway at Dahlia Trailhead:

- **Sand Creek Trail:** An approximately 400-foot-long segment of the trail would be temporarily closed adjacent to the Dahlia Trailhead to accommodate realigning the trail (Figure 23). A temporary easement is needed to construct these improvements, and approximately 280 feet of the trail is within the proposed easement. The trail realignment would address an existing blind curve along the trail which creates a safety issue.

A temporary trail would be constructed that would maintain access from the Dahlia Trailhead parking area to the trail and detour users around the construction area (Figure 23). The trail would be reopened following construction at this location.

- **Sand Creek Greenway:** A sidewalk would be constructed along the east side of East 56th Avenue and south side of South Sandcreek Drive, with sidewalk connections into the

Dahlia Trailhead parking area as well as the entrance to the trailhead. A permanent easement of 0.06 acres would be acquired from the Greenway for construction and maintenance of the sidewalk. Additionally, the Greenway would be temporarily disturbed to construct a temporary detour trail for the Sand Creek Trail. A temporary easement of 1.15 acres would be acquired from the Greenway, encompassing the Dahlia Trailhead, for construction access. All disturbed areas of the Greenway would be restored following construction of the project.

Impacts to the Dahlia Trailhead, which is within the Sand Creek Greenway property, are discussed separately in Section 6.2.4.

Figure 23. Sand Creek Trail and Greenway Impacts at Dahlia Trailhead



Sand Creek Trail and Greenway between East 56th Avenue and Krameria Street:

- Sand Creek Trail: Underground pipe outfalls extending between I-270 and the Sand Creek would be installed under the Sand Creek Trail at eight locations between approximately 900 feet east of East 56th Avenue to Krameria Street (Figure 24 and Figure 25). This work would occur completely within CDOT ROW and would be completed in a manner that would allow trail continuity to be maintained within the established operating hours of 5

a.m. to 11 p.m. Additionally, flaggers would be utilized if construction activities, such as moving equipment across the trail, require a short closure (no more than 15 minutes) and management of trail traffic.

- Sand Creek Greenway: The Greenway would not be impacted during outfall installation as all work would occur within CDOT ROW.

Figure 24. Sand Creek Trail and Greenway Impacts between East 56th Avenue and Krameria Street (Figure 1 of 2)

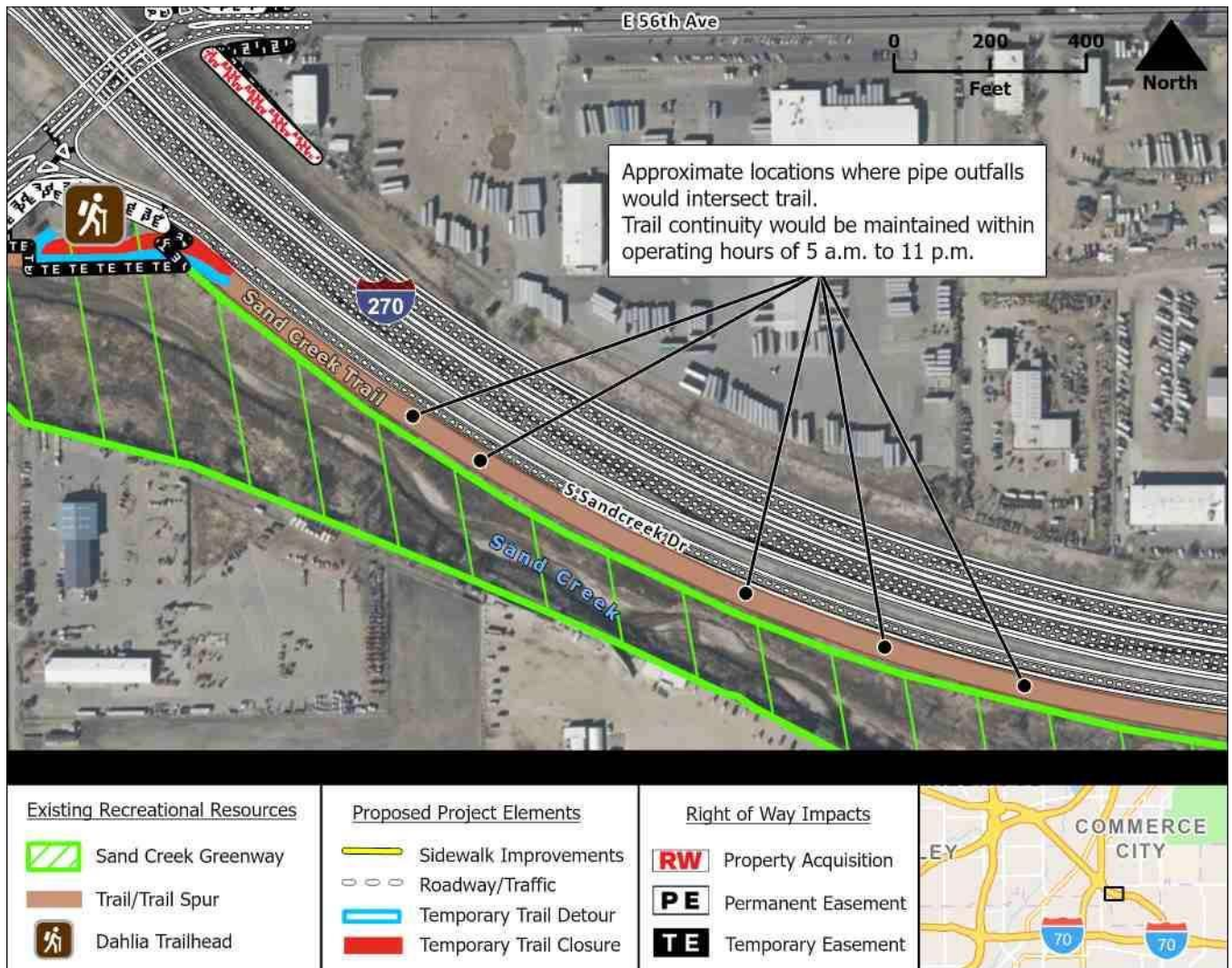


Figure 25. Sand Creek Trail and Greenway Impacts between East 56th Avenue and Krameria Street
(Figure 2 of 2)



Sand Creek Trail and Greenway at East 53rd Way:

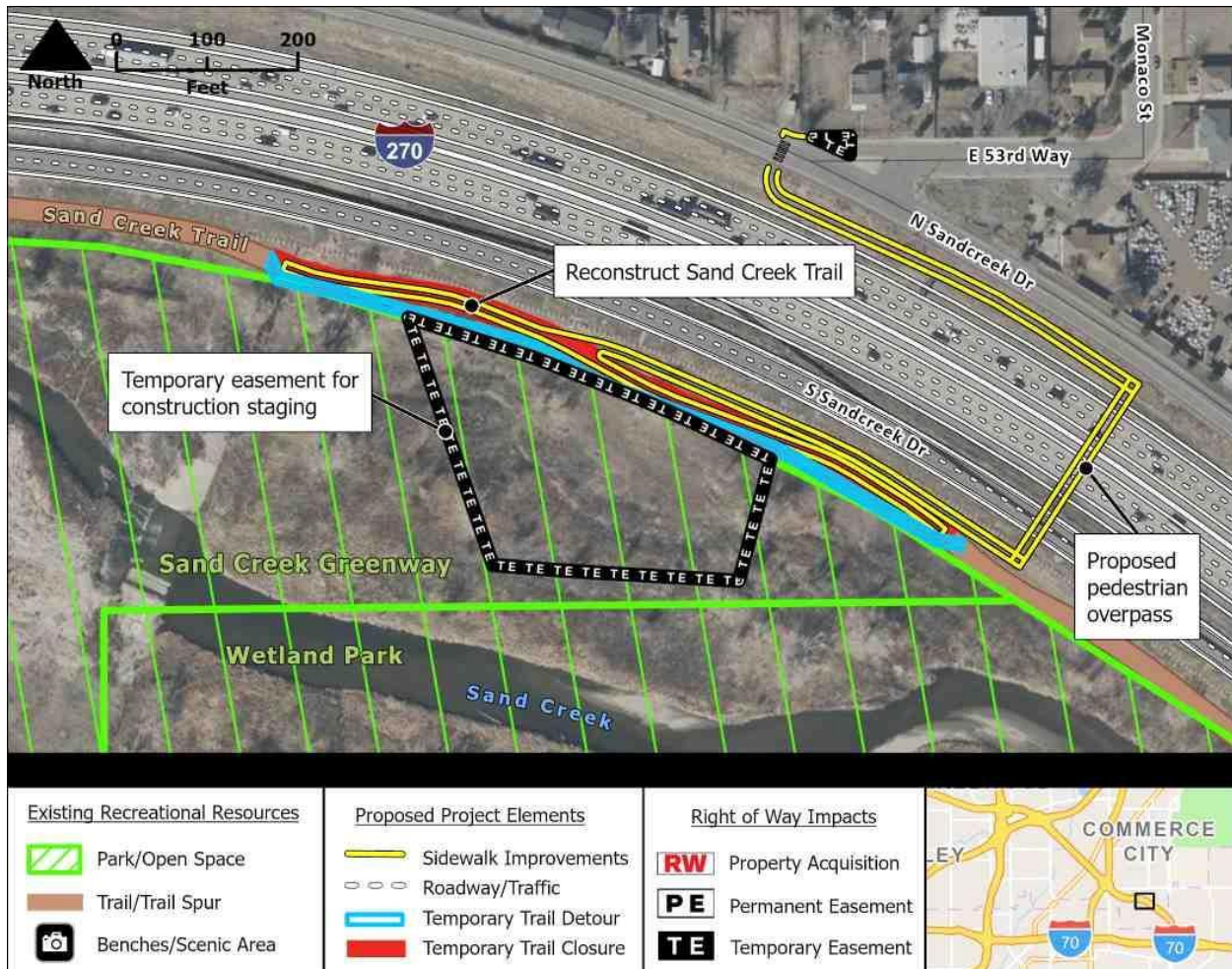
- Sand Creek Trail: A pedestrian overpass is being proposed that would connect with the Sand Creek Trail south of I-270, cross over South Sand Creek Drive and I-270, and connect with North Sand Creek Drive at East 53rd Way north of I-270 (Figure 26). An approximately 800-foot-long segment of the Sand Creek Trail would be closed during installation of the pedestrian overpass and for reconstruction of the trail.

A temporary trail would be constructed to detour trail users around the construction area and maintain access along the Sand Creek Trail (Figure 26). The trail would be reopened following reconstruction of the trail and construction of the pedestrian bridge.

- Sand Creek Greenway: The Greenway would be temporarily disturbed to construct the temporary detour trail for the Sand Creek Trail. Additionally, a temporary easement of approximately 1.50 acres would be acquired from the Greenway for temporary

construction staging. All disturbed areas of the Greenway would be restored following construction of the project.

Figure 26. Sand Creek Trail and Greenway Impacts at East 53rd Way



Signage would be installed at strategic locations along and off the trail that would clearly communicate the expected construction timeline, closure and detour areas, and would be regularly maintained to ensure the information remains accurate and up to date. Strategic locations include access points, parking areas, trailheads, and points at which the trail enters and exits the project area.

Commerce City's trail specifications will be incorporated into the design for the replacement of all impacted segments of the Sand Creek Trail.

6.2.4 Dahlia Trailhead

6.2.4.1 Recreational Impacts

New sidewalk is proposed along the east side of East 56th Avenue and south side of South Sandcreek Drive, which would connect to the Dahlia Trailhead parking lot on the north side and the access to the trailhead off South Sandcreek Drive (Figure 23). The new sidewalk connections would provide additional safe access for bicyclists and pedestrians to the trailhead and the Sand Creek Trail. This work may temporarily impact existing paved areas of the trailhead parking lot at points of tie in. A permanent easement would be acquired from the Sand Creek Greenway, which encompasses the Dahlia Trailhead, for the new sidewalk, and a small portion of the Dahlia Trailhead paved parking is within the proposed easement where the sidewalk would tie in (approximately 80 square feet). Additionally, the trailhead parking area is encompassed within a temporary easement to be acquired from the Sand Creek Greenway for construction access.

The trailhead would remain open during construction, with a minimum of 25 percent (approximately 6 spaces) of the existing parking area being available for public use. Public access down to the Sand Creek Trail from the trailhead parking area would be maintained and an existing gate at the southwest corner would be kept open for maintenance access. Signage would be installed at the trailhead and along the nearby trail segment that would clearly communicate the expected construction timeline and would be regularly maintained to ensure the information remains accurate and up to date. The SCRGP would be notified at least 6 weeks in advance of construction requiring use of the parking area to determine if there are any scheduled events. Use of the parking area for construction access would not be permitted during events requiring use of the parking area. Email correspondence occurred with the OWJs in January 2025 to obtain agreement with the above mitigation commitments (Ferguson pers. comm. 2025) (Fair pers. comm. 2025).

All disturbances would be restored to pre-construction conditions following construction activities at the Dahlia Trailhead.

6.2.5 Northfield Trail

6.2.5.1 Recreational Impacts

The Northfield Trail traverses the east side of Quebec Street. The existing trail may be temporarily disturbed to construct new curb and gutter at the I-270 eastbound off-ramp (Figure 27). Continuity of the Northfield Trail would be maintained at all times using signs and flaggers to manage traffic along the trail. Any disturbances to the trail would be restored following construction at this location.

Figure 27. Northfield Trail Impacts at I-270 and Quebec Street

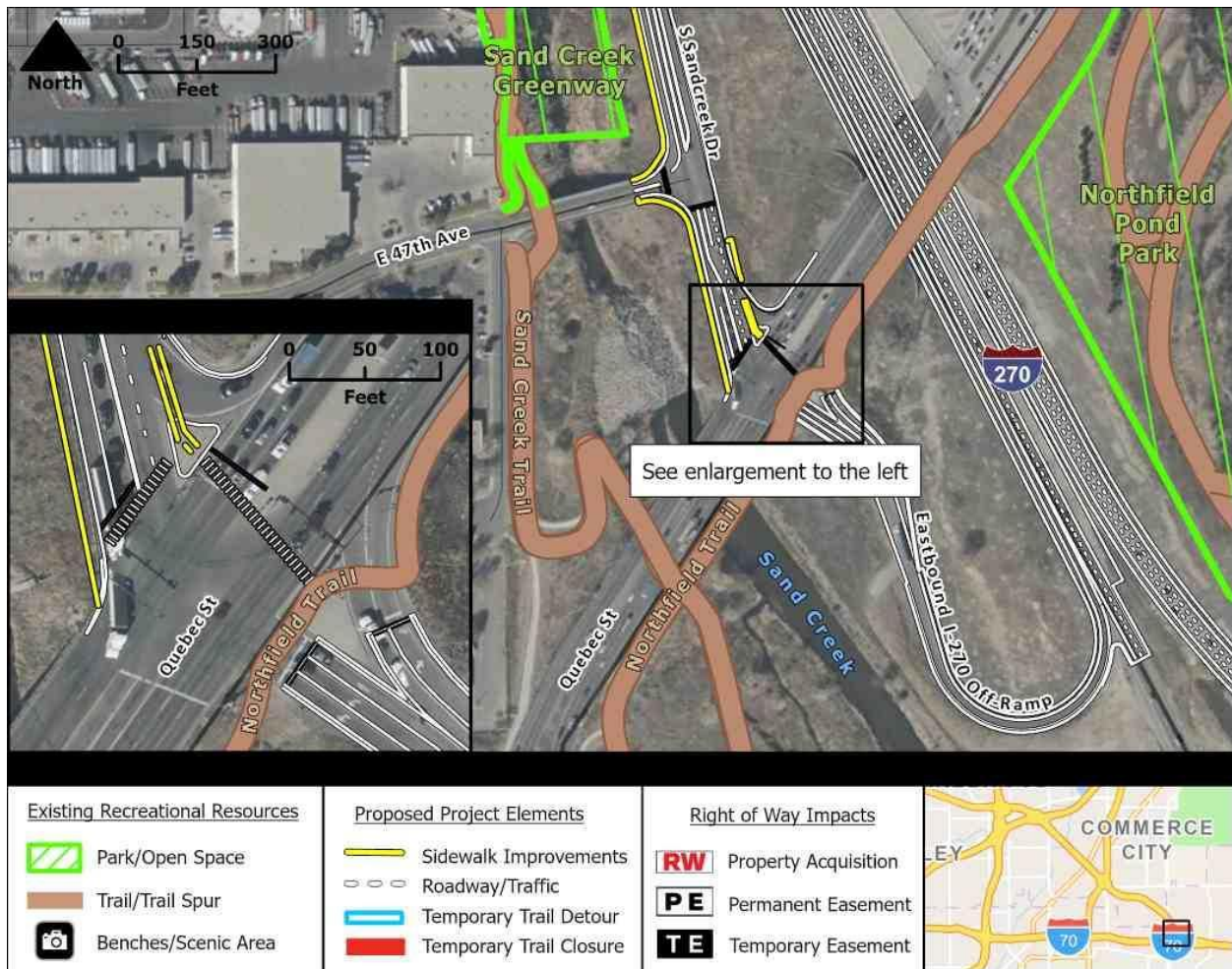


Table 2. Summary of Recreational and Section 6(f) Uses for Existing Resources

Resource Name	Recreational Impact?	Section 6(f) Use?
Clear Creek Trail	No - Outside of project limits	No - Outside of project limits
South Platte River Trail	Yes	Not applicable (N/A) - LWCF property boundary not within project limits
Sand Creek Trail	Yes	N/A - Not a LWCF property
Dahlia Trailhead	Yes	N/A - Not a LWCF property
Wetland Park Trailhead	No - Outside of project limits	N/A - Not a LWCF property
Wetland Loop Trail	No - Outside of project limits	N/A - Not a LWCF property
Northfield Trail	Yes	N/A - Not a LWCF property
Sand Creek Greenway	Yes	N/A - Not a LWCF property
Veteran's Memorial Park and Eagle Pointe Recreation Center	No - Outside of project limits	N/A - LWCF property boundary not within project limits
Leyden Park	No - Outside of project limits	N/A - Not a LWCF property
Wetland Park	No - Outside of project limits	N/A - Not a LWCF property
Northfield Pond Park	No - Outside of project limits	N/A - Not a LWCF property
Prairie Basin	No - Outside of project limits	N/A - Not a LWCF property

7.0 Mitigation Measures

Table 3 shows a summary of impacts and mitigations for the build alternatives.

Table 3. Summary of Impacts and Mitigation for Build Alternatives

Activity Triggering Mitigation	Location of Activity	Impact	Mitigation	Responsible Branch	Timing/Phase that Mitigation will be Implemented
Roadway resurfacing and re-striping	Clear Creek Trail underpass at I-270	Potential for falling debris during construction	The Contractor shall incorporate measures to protect users of the Clear Creek Trail underpass from falling debris.	CDOT Engineering and Contractor	Final Design and Construction
Bridge replacements; Underground pipe outfall installation; Trail improvements	South Platte River Trail underpass at I-270; Spur to Sand Creek Trail at Brighton Boulevard/East 60th Avenue; Sand Creek Trail underpass at Vasquez Boulevard; Sand Creek Trail at Dahlia Trailhead; Sand Creek Trail at East 53rd Way	Temporary disturbance to trails	Access along existing trails shall be maintained, where possible, using signs and flaggers, as needed. Where closures of existing trails are necessary to complete construction activities, temporary trails shall be constructed to maintain access along trails during construction. Officials with jurisdiction (OWJs) over the trails shall be notified at least two weeks prior to closure. For the South Platte River Trail this is Adams County Parks, Open Space, & Cultural Arts. For the Sand Creek Trail, this is Commerce City Parks, Recreation and Golf and Sand Creek Regional Greenway Partnership (SCRGP).	CDOT Engineering and Contractor	Pre-Construction and Construction

Bridge replacements; Underground pipe outfall installation; Trail improvements	South Platte River Trail underpass at I-270; Spur to Sand Creek Trail at Brighton Boulevard/East 60th Avenue; Sand Creek Trail underpass at Vasquez Boulevard; Sand Creek Trail at Dahlia Trailhead; Sand Creek Trail at East 53rd Way	Temporary disturbance to trails	Signage shall be installed at strategic locations along and off the trail (access points, parking areas, trailheads, etc.), and shall clearly communicate the expected construction timeline, and closure and detour areas. Signs shall be maintained, as needed, to ensure information remains accurate and up to date.	CDOT Engineering and Contractor	Pre-Construction and Construction
Bridge replacements; Underground pipe outfall installation; Trail improvements	South Platte River Trail underpass at I-270; Spur to Sand Creek Trail at Brighton Boulevard/East 60th Avenue; Sand Creek Trail underpass at Vasquez Boulevard; Sand Creek Trail at Dahlia Trailhead; Sand Creek Trail at East 53rd Way	Temporary disturbance to trails	Flaggers and signage shall be utilized to manage bicyclists and pedestrians if the temporary trail cannot be constructed to the minimum standard width to accommodate both users.	CDOT Engineering and Contractor	Pre-Construction and Construction

Bridge replacements; Underground pipe outfall installation; Trail improvements	South Platte River Trail underpass at I-270; Spur to Sand Creek Trail at Brighton Boulevard/East 60th Avenue; Sand Creek Trail underpass at Vasquez Boulevard; Sand Creek Trail at Dahlia Trailhead; Sand Creek Trail at East 53rd Way	Temporary disturbance to trails	Impacted trail segments shall be reconstructed and reopened immediately following trail-disturbing construction activities.	CDOT Engineering and Contractor	Construction
Bridge replacements; Underground pipe outfall installation; Trail improvements	South Platte River Trail underpass at I-270; Spur to Sand Creek Trail at Brighton Boulevard/East 60th Avenue; Sand Creek Trail underpass at Vasquez Boulevard; Sand Creek Trail at Dahlia Trailhead; Sand Creek Trail at East 53rd Way	Temporary disturbance to trails	Ensure that Adams County trail specifications are incorporated in the design for areas of the South Platte River Trail to be replaced, and that Commerce City trail specifications are incorporated into the design for areas of the Sand Creek Trail to be replaced.	CDOT Engineering and Contractor	Final Design and Construction

Bridge replacements	South Platte River Trail underpass at I-270; Spur to Sand Creek Trail at Brighton Boulevard/East 60th Avenue; Sand Creek Trail underpass at Vasquez Boulevard	Temporary and disturbance to trails; overnight closures of trail underpasses	Temporary trails shall be constructed prior to beginning bridge girder installation to ensure adequate vertical clearance is maintained between the temporary trail and the bottom of the new girders. Protective measures shall be in place to protect trail users along the temporary trail, from construction activities required to construct the new bridge.	CDOT Engineering and Contractor	Pre-Construction and Construction
Bridge replacements	South Platte River Trail underpass at I-270; Spur to Sand Creek Trail at Brighton Boulevard/East 60th Avenue; Sand Creek Trail underpass at Vasquez Boulevard	Temporary disturbance to trails; overnight closures of trail underpasses	Necessary closures of temporary trails restricting use of trail underpasses shall only occur outside established operating hours of 5 a.m. to 11 p.m. Temporary trails shall reopen promptly inside established operating hours. The OWJ over the trails shall be notified at least two weeks prior to construction activities, requiring overnight closures of underpasses. For the South Platte River Trail, this is Adams County Parks, Open Space, & Cultural Arts. For the Sand Creek Trail, this is Commerce City Parks, Recreation and Golf and SCRGP.	CDOT Engineering and Contractor	Pre-Construction and Construction
General construction activities	Sand Creek Greenway at west of Burlington Ditch, Brighton Boulevard/East 60th Avenue, Vasquez Boulevard, Dahlia Trailhead, and East 53rd Way	Temporary disturbance of the Sand Creek Greenway	All disturbed areas from construction activities within the Sand Creek Greenway shall be restored following construction.	CDOT Engineering and Contractor	Construction and Post-Construction

General construction activities	Benches and sign within Sand Creek Greenway 300 feet west of Vasquez Boulevard	Potential disturbance to Sand Creek Greenway amenities during construction	The paved area containing benches and a sign within the Sand Creek Greenway approximately 300 feet west of Vasquez Boulevard shall not be disturbed during construction.	CDOT Engineering and Contractor	Construction
Construction of sidewalk connections; General construction activities	Dahlia Trailhead	Temporary disturbance of Dahlia Trailhead	Dahlia Trailhead shall remain open for recreational use during construction, and all disturbances to the trailhead shall be restored following construction at that location.	CDOT Engineering and Contractor	Construction and Post-Construction

8.0 Required Permits and Coordination

There are no permits required for Recreational resources or LWCF property. No consultation is anticipated for Section 6(f).

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Attachment A. NPS Response to Notice of Intent to Prepare an EIS

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