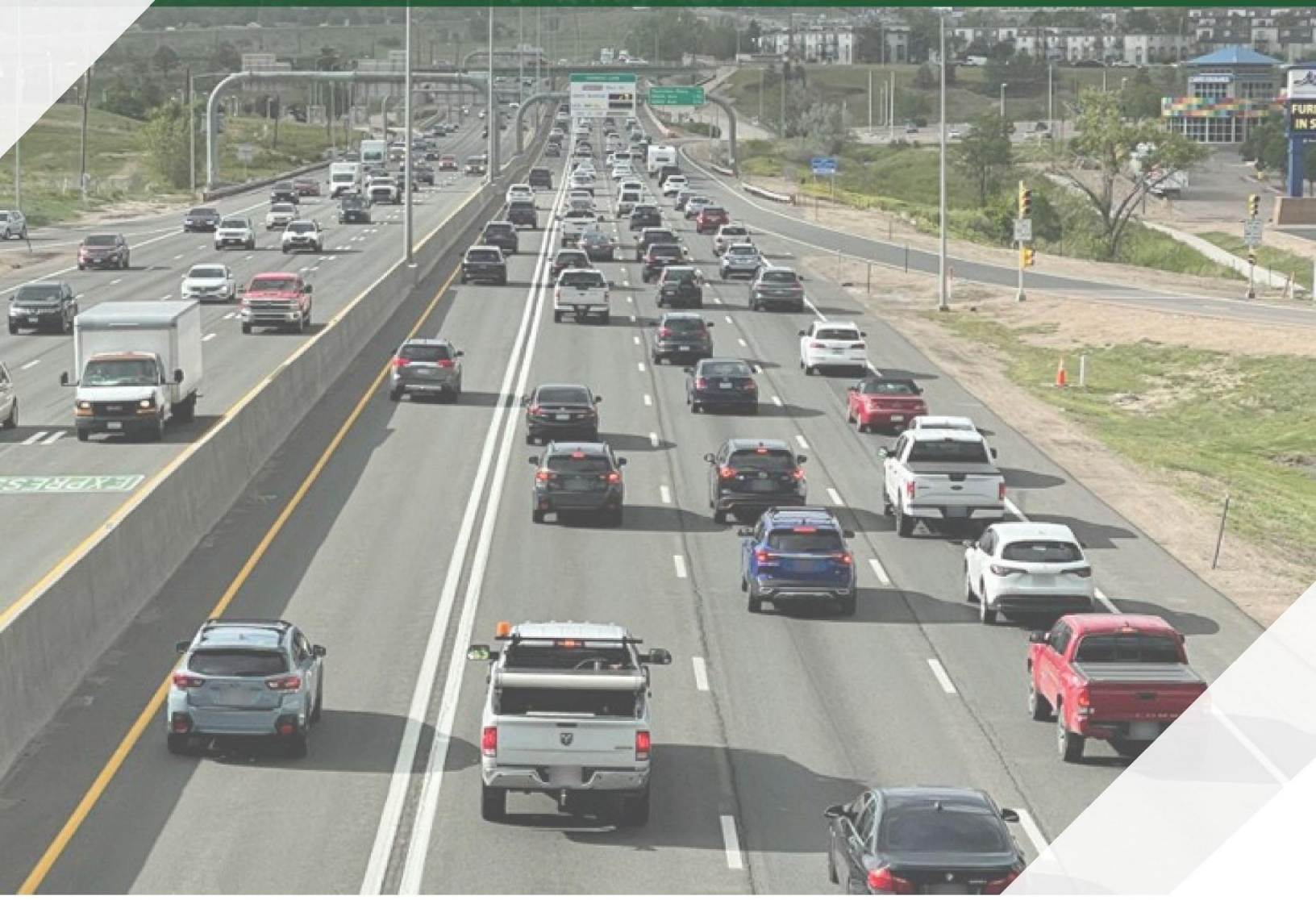
I-25 (US 36 to 104th Avenue)

Safety and Operations Improvements Project



Appendix D14: Section 4(f) Technical Report

October 2026

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Appendix D14. Section 4(f) Technical Report

October 20, 2026 - Version 5
Project Number: PM 0253-299
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Acronyms and Abbreviations

Acronym/ Abbreviation	Full Name
CDOT	Colorado Department of Transportation
CFR	Code of Federal Regulations
CPW	Colorado Parks and Wildlife
EIS	Environmental Impact Statement
FHWA	Federal Highway Administration
GIS	Geographic Information System
I-25	Interstate 25
I-76	Interstate 76
I-270	Interstate 270
IGA	Intergovernmental Agreement
NEPA	National Environmental Policy Act
NPS	National Park Service
OWJ	Official with Jurisdiction
ROD1	Record of Decision 1
ROW	Right-of-Way
US 36	United States Highway 36

1.0 Introduction and Background

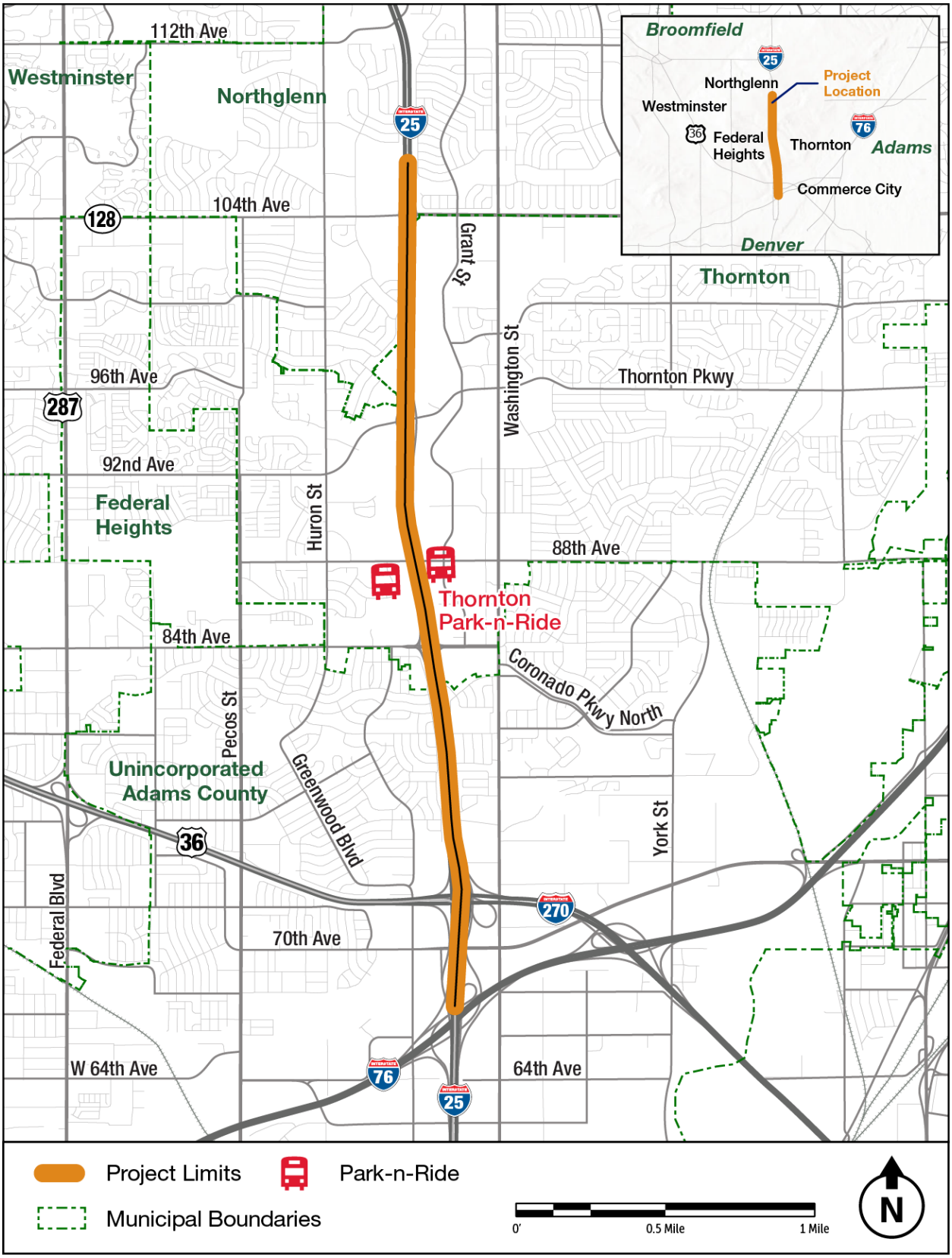
The Colorado Department of Transportation (CDOT) and Federal Highway Administration (FHWA) are proposing transportation improvements to Interstate 25 (I-25) between United States Highway 36 (US 36)/I-270/I-76 interchange and 104th Avenue (**Figure 1**). This Section 4(f) Technical Report (technical report) was prepared to support evaluation of the I-25 (US 36 to 104th Avenue) Safety and Operations Improvements project (the Project).

CDOT has previously completed an Environmental Impact Statement (EIS) and other planning efforts that recommended improvements to this segment of I-25. The current project evaluates proposed transportation improvements that reflect and build upon previous recommendations. Because the current project includes elements that were not evaluated and approved in the **North I-25 Record of Decision 1** (ROD1) (FHWA and CDOT, 2011), this project is undergoing new evaluation under the National Environmental Policy Act (NEPA).

The following project information can be found in **Attachment A Project Information**:

- Project History
- Project Limits
- Purpose and Need
- Proposed Action Description

Figure 1. Project Limits



2.0 Regulatory Setting

2.1 Section 4(f) Resources

Section 4(f) of the United States Department of Transportation Act of 1966, as amended and codified in 49 United States Code §303, and implemented through 23 Code of Federal Regulations (CFR) §774 declares that "It is the policy of the United States Government that special effort should be made to preserve the natural beauty of the countryside and public park and recreation lands, wildlife and waterfowl refuges, and historic sites." The FHWA Section 4(f) Policy Paper (FHWA, 2012) was also referenced for this project.

Section 4(f) requires consideration of:

- Parks and recreation areas of national, state, or local significance that are both publicly owned and open to the public.
- Publicly owned wildlife and waterfowl refuges of national, state, or local significance that are open to the public to the extent that public access does not interfere with the primary purpose of the refuge.
- Historic sites of national, state, or local significance in public or private ownership regardless of whether they are open to the public.

This technical report addresses historic and recreational Section 4(f) resources.

2.1.1 Section 4(f) Regulations

Section 4(f) stipulates that FHWA and other Department of Transportation agencies cannot approve the use of the above resources for transportation projects unless one of the following occurs:

- FHWA determines that use of the property, including any measure(s) to minimize harm committed by the applicant, will have a *de minimis* impact on the property; or
- FHWA determines that there is no feasible and prudent avoidance alternative to the use of land from the property; and the action includes all possible planning to minimize harm to the property resulting from such use.

According to the FHWA Environmental Review Toolkit (FHWA, 2025), a recreation resource must meet the following criteria to qualify as a Section 4(f) property:

- It must be publicly owned.
- It must be open to the public (except in certain cases for refuges as highlighted in the sections below).
- Its major purpose must be for park, recreation, or refuge activities.
- The major purpose is related to the property's primary function and how it is intended to be managed. This is determined through review of any existing master or management plans and consultation with the official(s) with jurisdiction (OWJ).
- It must be significant as a park, recreation area, or refuge.

- The term "significant" means that in comparing the availability and function of the park, recreation area, or refuge with the park, recreation, or refuge objectives of the agency, community, or authority, the property in question plays an important role in meeting those objectives.

According to the FHWA Environmental Review Toolkit (FHWA, 2025), a historic site must meet the following criteria to qualify as a Section 4(f) property:

- Historic sites of national, state, or local significance in public or private ownership regardless of whether they are open to the public (See 23 United States Code [U.S.C.] § 138(a) and 49 U.S.C. § 303(a)).
- These historic sites are defined as sites eligible for inclusion in the National Register of Historic Places (NRHP) through the Section 106 process.

2.1.2 Section 4(f) Uses

Subject to certain exceptions outlined in 23 CFR §774.13, there are three types of Section 4(f) uses:

- Permanent Incorporation. Land is considered permanently incorporated into the transportation facility when it has been purchased as right-of-way (ROW), or when a permanent easement has been acquired.
- Temporary Occupancy. When there is a temporary occupancy of land that does not meet the following requirements, as stated in 23 CFR §774.13(d):
  - The duration of use must be temporary. The use of the Section 4(f) resource should be less than the time needed for construction of the project, and there should be no change in land ownership.
  - The scope of work must be minor. Both the nature and the magnitude of the changes must be minimal.
  - There are no anticipated permanent adverse physical impacts or interference with the protected activities, features, or attributes of the property on either a temporary or permanent basis.
  - The land being used must be fully restored. The property must be returned to a condition that is at least as good as the condition in which it existed prior to the project.
  - There must be a documented agreement from the OWJ over the Section 4(f) resource regarding the above conditions.
- Constructive Use. A constructive use occurs when the transportation project does not incorporate land from a Section 4(f) property, but the project's proximity impacts are so severe that the protected activities, features, or attributes that qualify a resource for protection under Section 4(f) are substantially impaired.

Certain uses of Section 4(f) land may have a minimal or *de minimis* impact on the protected resource. When this is the case, FHWA can make a *de minimis* impact determination. A *de minimis* impact on a public parkland, recreation area, or wildlife and waterfowl refuge is defined as that which does not "adversely affect the features, attributes or activities qualifying the property for protection under Section 4(f)." This determination can be made only after the concurrence of the OWJ and opportunity for public review and comment on the

proposed determination. Use of properties with *de minimis* impacts does not require an analysis of avoidance alternatives or a least harm analysis (FHWA, 2012).

3.0 Methodology

This section describes methods for gathering data on Section 4(f) resources and determining impacts as part of the project.

3.1 Recreation Resources

GIS data were used to identify details and characteristics of existing and planned parks and recreation resources in the project area (**Figure 2** and **Figure 3**). Resources directly adjacent to the project area, and generally located within 0.25 mile, were considered and included in this analysis. Some resources further than 0.5 mile from the project area were also included if they had a connection to other resources directly adjacent to the project area. Additional inventory details about the resources, such as ownership, size, and amenities, were obtained from the City of Thornton website (City of Thornton, 2017b).

After identification of recreation resources near the project area, a determination was made as to whether those properties are protected under Section 4(f). Recreation resources were initially identified through the Colorado Trail Explorer website and then verified using the GIS data from Adams County and the City of Thornton (CPW, 2024). Relevant trail, park, and open space plans near the project area were also referenced including the City of Thornton master plan; the Adams County Parks, Trails, and Open Space Plan; and the Denver Moves: Pedestrians and Trails Plan (City of Thornton, 2017a; Adams County, 2022; City and County of Denver, 2017). Section 4(f) is not necessarily applicable to all recreation properties as they must qualify to be protected under Section 4(f); for example, a trail with a primary purpose for transportation and identified as such would not qualify as a Section 4(f) resource.

Direct impacts on resources were identified by overlaying the project area for the Proposed Action on maps showing the Section 4(f) resources and identifying areas of overlap. Indirect impacts were evaluated by identifying changes in access, noise levels, and views on Section 4(f) resources resulting from the Proposed Action. Construction impacts resulting in temporary changes of use or detours were identified through coordination with the project design team. Following identification of impacts, mitigation measures were identified. Additionally, Section 4(f) requirements were identified, including agency consultation for proposed impacts. These findings are discussed in subsequent sections.

Figure 2. Existing and Proposed Recreation Resources – North



Figure 3. Existing and Proposed Recreation Resources – South



3.2 Historic Resources

Historic resources were identified consistent with 36 CFR §800.4. See the **Historic Resources/Section 4(f) (History) Technical Report** for more information. For historic resources determined to meet the Section 4(f) criteria, this report then considers impacts identified in the **Historic Resources/Section 4(f) (History) Technical Report** and evaluates whether there is a use, or if an exception applies, consistent with 23 CFR § 774.13.

4.0 Existing Conditions

4.1 Recreation Resources Considered

The recreation resources detailed below were considered as part of this analysis. **Table 1** provides a summary of each resource and identifies whether each park, recreation, and open space resource is protected under Section 4(f).

One planned trail is within the buffer area for the project. A City of Thornton planned trail runs along East 84th Avenue south of the Niver Creek Trail (**Figure 2** and **Figure 3**). The planned trail would connect the Niver Creek Trail to the Niver Canal Trail to the east (City of Thornton, 2017a).

4.1.1 Civic Center Park

Civic Center Park is located in and managed by the City of Thornton. The park includes a picnic area, restroom, shelter, and walking trail (Photo 1). Croke Lake is located in the park, which is available for recreational fishing. The park is located on more than 20 acres and is adjacent to the east side of I-25 and north of Thornton Parkway at 9751 Civic Center Drive.

Croke Lake and Civic Center Park are a part of Naturally Thornton, which is a plan to gradually convert select passive turf areas to Colorado-friendly community landscapes (City of Thornton, 2025). The plan, developed in 2019, aims to conserve water, enhance native and resilient vegetation, and increase biodiversity.

4.1.2 Civic Center Park Trail

The Civic Center Park Trail is a 1.5-mile trail located in Civic Center Park in the City of Thornton (Photo 1). The trail loops around Croke Lake #12. Access to the trail can be found both from Grant Street and from Thornton Parkway. This trail connects to an unnamed trail at Grant Street and to the Thornton Parkway Trail at Thornton Parkway.



Photo 1. Civic Center Park and Civic Center Park Trail (via AllTrails, 2021; Peterson, 2021)

4.1.3 Badding Reservoir

Badding Reservoir is managed by the City of Thornton and is located west of I-25 and north of Thornton Parkway (Photo 2). Badding Reservoir is a dry reservoir not open to the public. The area around the reservoir is 17.5 acres and is protected open space, noted in the City of Thornton's master plan as being a visual and physical buffer along Thornton Parkway and I-25, while protecting environmental resources and wildlife habitat.



Photo 2. Badding Reservoir (via GoogleEarth, 2025a)

4.1.4 North Mor Elementary School

North Mor Elementary School has a 7.65-acre property including a school building, grass field, basketball court, playground, and parking lot (Photo 3). The school is northwest of the intersection of I-25 and Thornton Parkway at 9580 Damon Drive in the City of Northglenn. This resource is not open to the public.



Photo 3. North Mor Elementary School (via Northmor.adams12.org, 2025)

4.1.5 Badding Open Space

The Badding Open Space is located south of Thornton Parkway and west of I-25, just south of the North Mor Elementary School (Photo 4). The open space is 11 acres and is not open to the public. It is designated open space managed by the City of Thornton. The purpose of the open space is to provide a visual buffer along Thornton Parkway and I-25 and to protect environmental resources and wildlife habitat (City of Thornton, n.d.; City of Thornton, 2017b).



Photo 4. Badding Open Space (via GoogleEarth, 2025b)

4.1.6 Grange Creek Trail

The entire Grange Creek Trail is more than 6.5 miles long; the trail is a concrete regional off-street multiuse path running on the east side of I-25 in the project area (Photo 5). The trail is managed by the City of Thornton and provides connections to several other trails, including the Farmers Highline Canal Trail north of the project area and the Thornton Parkway Trail.



Photo 5. Grange Creek Trail at Washington Street (via GoogleEarth, 2025c)

4.1.7 North Creek Park

North Creek Park is located north of the Niver Creek Open Space and northwest of the intersection of I-25 and 88th Avenue (Photo 6). The park is 3 acres and is located at 498 West 91st Circle. The park contains a walking trail, barbeque area, picnic area, shelter, and playground.



Photo 6. North Creek Park (via GoogleEarth, 2025d)

4.1.8 Niver Creek Open Space

Niver Creek Open Space is 63.3 acres and is located on the northwest corner of the intersection of I-25 and 88th Avenue (Photo 7). The open space is managed by the City of Thornton, and its management is documented in the Thornton Parks and Open Space Master Plan. The corridor that contains the Niver Creek Open Space is a highly used resource and is a high priority for the City of Thornton. The Niver Creek Corridor contains a large number of major resource values (City of Thornton, 2017a). The City of Thornton seeks to provide natural vegetation in the protected open space while providing recreational opportunities throughout.

4.1.9 Niver Creek Open Space Trails

The Niver Creek Open Space Trails are located in the Niver Creek Open Space (Photo 7). The trails are 0.7 mile long and located on the northwest corner of the intersection of I-25 and 88th Avenue. These trails are located in the Niver Creek Corridor, which is detailed in the City of Thornton's master plan (City of Thornton, 2017a) and is a high-priority corridor for the City of Thornton for preservation.



Photo 7. Niver Creek Open Space and Niver Creek Open Space Trails (via valerianllc.com, 2024)

4.1.10 Niver Creek Trail

The Niver Creek Trail is 4.5 miles long and traverses the Niver Creek Open Space. This trail is managed by the City of Thornton, and management is detailed in the Thornton Parks and Open Space Master Plan (City of Thornton, 2017a). This trail is in the Niver Creek Corridor, which is a high priority for preservation by the City of Thornton. The trail provides access to the Thornton Park-n-Ride Station south of 88th Avenue.

4.1.11 Niver Tributary L Open Space

The Niver Tributary L Open Space is located north of 84th Avenue and west of I-25 (Photo 8). The Niver Tributary L Open Space Trail runs through the open space; no other recreational opportunities exist at the open space.

4.1.12 Niver Creek Trail - Access

The Niver Creek Trail - Access is located on preserved land managed by the City of Thornton north of 84th Avenue and west of I-25 (Photo 8). This segment of the trail is approximately 0.5 mile long and connects to the Niver Creek Trail.



Photo 8. Niver Tributary L Open Space and the Niver Creek Trail – Access (via GoogleEarth, 2025e)

4.1.13 Northstar Park

Northstar Park is located at the southeast corner of the intersection of Huron Street and 88th Avenue (Photo 9). The park is directly adjacent to the North Star Elementary School. The park contains a multiuse hard surface trail, a shelter, and a grass field.

4.1.14 Northstar Elementary Trails

The Northstar Elementary Trails is a hard-surface trail loop located in Northstar Park and is less than 1 mile long (Photo 9). The trail loops around the grass field at the park and is mainly used for recreational purposes.



Photo 9. Northstar Park and Northstar Elementary Trails (via GoogleEarth, 2025f)

4.1.15 Thornton Parkway Trail

The Thornton Parkway Trail runs along Thornton Parkway in the City of Thornton (Photo 10). The trail is a paved sidewalk, providing access along the parkway, generally for commuters, but also provides access to off-street trails such as the Niver Creek Trail and the Civic Center Park Trail.



Photo 10. Thornton Parkway Trail at Washington Street and Thornton Parkway (via GoogleEarth, 2025g)

4.1.16 Pinnacle Athletic Complex

The Pinnacle Athletic Complex was constructed in 2021 by the Pinnacle Charter School (Photo 11). The complex is 11,500 square feet (ft) on 11.6 acres. The main purpose of the complex is a ballfield for the charter school. The complex is just north of 84th Avenue and west of I-25 in the City of Thornton.



Photo 11. Pinnacle Athletic Complex (via GoogleEarth, 2025h)

4.1.17 Grant Park

Grant Park is a 7.0-acre natural open space located at Grant Drive and 106th Avenue in the City of Northglenn and contains a natural area and a trail (Photo 12). The area is maintained in a natural state (City of Northglenn, 2017).



Photo 12. Grant Park (via GoogleEarth, 2025i)

4.1.18 Eleanor M. Wyatt Park

The Eleanor M. Wyatt Park is a 2.66-acre park with a sculpture garden and rose bed (Photo 13). The park was originally named the "Civic Gardens," and was renamed after Eleanor M. Wyatt in 1981 for her contribution and dedication to the Northglenn Metropolitan Recreation District and the Northglenn Garden Club (City of Northglenn, 2017). The park is north of Kennedy Drive and west of I-25. A trail runs through this park with no other recreational opportunities available.

4.1.19 Eleanor M. Wyatt Trail

The Eleanor M. Wyatt Trail is a 0.4-mile paved trail located in Eleanor M. Wyatt Park (Photo 13). The trail is managed by the City of Northglenn and crosses I-25 to connect with the Grange Creek Trail.



Photo 13. Eleanor M. Wyatt Park and Trail (via GoogleEarth, 2025j)

4.1.20 Clear Creek Trail

The Clear Creek Trail is a 24-mile paved multiuse trail that runs from Golden to Commerce City and caters to walkers, hikers, and bikers (Photo 14). Nine miles of the trail run through Adams County with five access points throughout: 55th Avenue and Lowell Boulevard, Twin Lakes Park, Little Dry Creek Open Space, Lowell Ponds Open Space, and Engineers Lake. The access point closest to the project area is Twin Lakes Park.



Photo 14. Clear Creek Trail at Twin Lakes Park (via gohikecolorado.com, 2020)

Table 1. Existing Parks, Recreation Resources, and Open Space

Map I #	Resource Name	Size/Location	Resource Type/ Description	Managed By	Section 4(f)
1	Eleanor M. Wyatt Park	2.66 acres. Located north of Kennedy Drive and west of I-25.	City of Northglenn park and associated trail containing a sculpture garden and rose bed. Eleanor M. Wyatt Park is publicly owned and accessible and primarily used for recreational purposes. Eleanor M. Wyatt Park is considered a significant recreation resource; therefore, it is considered a Section 4(f) resource.	City of Northglenn	Yes
2	Eleanor M. Wyatt Trail	0.4-mile trail running through Eleanor M. Wyatt Park.	A 0.4-mile trail providing access through Eleanor M. Wyatt Park north of 104th Avenue and west of I-25. Eleanor M. Wyatt Trail is publicly owned and accessible and primarily used for recreational purposes. Eleanor M. Wyatt Trail is considered a significant recreation resource; therefore, it is considered a Section 4(f) resource.	City of Northglenn	Yes
3	Grange Creek Trail	More than 6.5 miles of trails running down the east side of I-25 in the project area.	A more than 6.5-mile concrete multiuse path providing connections to several other City of Thornton trails. The Grange Creek Trail is publicly owned and accessible and primarily used for recreation. The trail is considered a significant resource; therefore, it is considered a Section 4(f) resource.	City of Thornton	Yes
4	Grant Park	7.0 acres. Located north of 104th Avenue and east of I-25 at Grant Drive and 106th Avenue.	City of Northglenn natural open space with a trail running through it. The park contains passive recreation features but its main use is not for recreation; therefore, it is not protected under Section 4(f).	City of Northglenn	No
5	Civic Center Park Trail	East of I-25 and north of Thornton Parkway.	Local off-street trail with access points at both Grant Street and Thornton Parkway. Connects to an unnamed trail to the north at Grant Street and the Thornton Parkway Trail to the south. The Civic Center Park Trail is publicly owned and accessible with a primary use of recreation. It is considered a significant recreation resource; therefore, it is considered a Section 4(f) resource.	City of Thornton	Yes
6	Civic Center Park	20.8 acres. Located adjacent to the east side of I-25, north of Thornton Parkway at 9751 Civic Center Drive.	Community park and recreation facility with pavilion/shade shelter (picnic area), fishing pond, and 0.5-mile trail loop. Civic Center Park is publicly owned and accessible with a primary use of recreation. It is considered a significant recreation resource; therefore, it is considered a Section 4(f) resource.	City of Thornton	Yes
7	Badding Reservoir	17.5 acres. Located west of I-25 and north of Thornton Parkway.	Designated open space with a reservoir. Not open to the public. No designated wildlife/waterfowl refuges. No existing or planned recreation facilities occur at the reservoir; therefore, Badding Reservoir is not considered a Section 4(f) resource.	City of Thornton	No

Map I #	Resource Name	Size/Location	Resource Type/ Description	Managed By	Section 4(f)
8	North Mor Elementary School	7.65 acres. Located at the northwest intersection of I-25 and Thornton Parkway.	Elementary school with a school building, grass field, basketball court, playground, and parking lot. These amenities are not open to the public; therefore, North Mor Elementary School is not considered a Section 4(f) resource.	North Mor Elementary School	No
9	Badding Open Space	11.0 acres. Located northwest of the I-25/Thornton Parkway interchange.	Designated open space. No designated wildlife/waterfowl refuges. No existing or planned recreation facilities occur in the open space; therefore, the Badding Open Space is not considered a Section 4(f) resource.	City of Thornton	No
10	Thornton Parkway Trail	Between East 100th Avenue and Thornton Parkway.	Multiuse hard surface trail running along Thornton Parkway with multiple access points. Connects to the Civic Center Park Trail and the Grange Hall Creek Trail to the north, and the Niver Creek Trail to the south. The Thornton Parkway Trail is publicly accessible with a primary use of recreation. It is considered a significant recreation resource; therefore, it is considered a Section 4(f) resource.	City of Thornton	Yes
11	Niver Creek Trail	Located west of I-25 and north and south of 88th Avenue. Crosses I-25 south of 88th Avenue at the Thornton Park-n-Ride Station underpass of I-25. Extends 4.5 miles from Pecos Park to the South Platte River Greenway Trail.	Provides access to the Thornton Park-n-Ride Station immediately south of 88th Avenue at I-25. Hard surface (concrete) and approximately 10 ft wide. Primary trail users are bicyclists and walkers. Begins near Pecos Street and West 96th Avenue with nearby access at Thornton Parkway and 88th Avenue. Connects to Niver Creek Open Space Trails in the Niver Creek Open Space. The Niver Creek Trail is publicly accessible and primarily used for recreation. It is considered a significant recreation resource; therefore, it is considered a Section 4(f) resource.	City of Thornton	Yes
12	North Creek Park	3.0 acres. Located west of I-25 between 88th Avenue and Thornton Parkway at 498 West 91st Circle.	Local pocket park with barbeque area, pavilion/shade shelter (picnic area), playground equipment, and paved concrete access trail. North Creek Park is publicly owned and accessible with a primary use of recreation. It is considered a significant recreation resource; therefore, it is considered a Section 4(f) resource.	City of Thornton	Yes
13	Niver Creek Open Space	63.3 acres. Located west of I-25 from 88th Avenue to Huron Street.	Designated open space with stormwater detention area and 0.7 mile of trails. The trails are existing recreation facilities; however, the Niver Creek Open Space is not designated as a park or recreation area, does not contain other recreation facilities, and does not contain designated wildlife and waterfowl refuges; therefore, it is not considered a Section 4(f) resource.	City of Thornton	No
14	Niver Creek Open Space Trails	0.7 mile of trails. Located west of I-25 from 88th Avenue to Huron Street.	Located in the Niver Creek Open Space with access points along 88th Avenue, Huron Street, and near West 91st Avenue. The Niver Creek Open Space Trails connect to the Niver Creek Trail in the Niver Creek Open Space. The Niver Creek Open Space Trails are existing recreation facilities that are publicly accessible with a primary use of recreation. They are considered a significant recreation resource; therefore, they are considered a Section 4(f) resource.	City of Thornton	Yes

Map I #	Resource Name	Size/Location	Resource Type/ Description	Managed By	Section 4(f)
15	Northstar Park	Located southeast of the Huron Street and 88th Avenue intersection. West of I-25.	Contains a multiuse hard surface trail, public pavilion area, and ball field. Northstar Park is publicly owned and accessible with a primary use of recreation. It is considered a significant recreation resource; therefore, it is considered a Section 4(f) resource.	City of Thornton	Yes
16	Northstar Elementary Trails	Less than 1 mile long. Located southeast of the Huron Street and 88th Avenue intersection. West of I-25.	Multiuse hard surface trail less than 1 mile long with access at Northstar Park. The Northstar Elementary Trails are primarily used for recreational purposes and are publicly accessible with a primary use of recreation. It is considered a significant recreation resource; therefore, the trails are considered a Section 4(f) resource.	City of Thornton	Yes
17	Pinnacle Athletic Complex	11.6 acres. Located just north of 84th Avenue and I-25.	Athletic complex associated with a private school containing a football field, walking path, and parking lot. Privately owned and therefore not considered a Section 4(f) resource.	Pinnacle Charter School	No
18	Niver Creek Trail – Access	West of I-25. South of 88th Avenue. Traverses the Niver Tributary L Open Space.	Local off-street multiuse trail that connects to the Niver Creek Trail west of I-25. The Niver Creek Trail – Access is primarily used for recreational purposes and is open to the public with a primary use of recreation. It is considered a significant recreation resource; therefore, it is considered a Section 4(f) resource.	City of Thornton	Yes
19	Niver Tributary L Open Space	8.8 acres. Located west of I-25, south of 88th Avenue to Huron Street.	Designated open space. No designated wildlife/waterfowl refuges. A trail runs through the open space; however, the open space itself does not provide any other recreation features. Therefore, the Niver Tributary L Open Space is not considered a Section 4(f) resource.	City of Thornton	No
20	Clear Creek Trail	Located north of I-76 and south of US 36. Crosses I-25.	7.3-mile paved trail with five access points, the closest to the project area being at Twin Lakes Park. The Clear Creek Trail is publicly accessible with a primary use of recreation. It is considered a significant recreation resource; therefore, it is considered a Section 4(f) resource.	Adams County Parks and Open Space	Yes

4.2 Historic Resources Considered

4.2.1 Historical Built Environment Resources

For CDOT's Section 106 evaluation of the project on the historical built environment, CDOT identified 39 age-eligible properties in the APE. CDOT determined 30 resources are not eligible for listing in the NRHP, 8 resources are eligible, and 1 resource needs data. CDOT made a finding of "no historic properties affected" for the 30 not-eligible resources. The eight NRHP-eligible resources and one needs-data resource will be impacted but their integrity will not be diminished by the proposed transportation improvements. Therefore, CDOT made a "no adverse effect" determination for the nine resources pursuant to 36 CFR 800.5 of the NHPA.

4.2.2 Section 4(f) Applicability

The nine historic properties are described below and evaluated for Section 4(f) applicability. **Table 2** at the end of this section summarizes the results. For more information, refer to the **Historic Resources/Section 4(f) (History) Technical Report**.

5AM80 Lower Clear Creek Canal (including 5AM80.1 and 5AM80.6)

The Lower Clear Creek Canal was determined officially eligible in 1994. Segment 5AM80.1 was determined officially supporting in 2009 (Fariello 2007). Segment 5AM80.6 was determined officially non-supporting of the significance of the entire resource in 2006. The canal is significant under Criterion A for its association with the development of agriculture and settlement in Colorado. It is an excellent example of a cooperative built ditch, along with the nearby Colorado Agricultural Ditch. There are no persons significant in our past associated with Lower Clear Creek Canal, making it not eligible under Criterion B. The ditch is also significant under Criterion C for being a well-maintained example of nineteenth-century irrigation engineering. It is one of the oldest ditches in the area. Further evaluation of the ditch will not yield additional significant information about earthen ditch construction or use and therefore it is not eligible under Criterion D.

Segment 5AM80.1 maintains its integrity of location, as it still follows its original trajectory. Despite the introduction of modern culverts and the canal being piped underground in places, most of the segment retains its earthen channel and berms and therefore can still convey some integrity of design, materials, and workmanship. The integrity of association is also maintained because the canal still conveys water. Integrity of feeling and setting are no longer maintained, as most of the canal used to extend through a rural setting, which is now largely suburban, and lacks the feeling of a rural agricultural canal.

CDOT determined that Lower Clear Creek Canal remains eligible under Criteria A and C, and segment 5AM80.1 remains supporting of the significance of the entire resource while segment 5AM80.6 remains non-supporting. Section 4(f) requirements apply to this eligible historic property.

5AM2073 Northglenn Subdivision 1st Filing

The Northglenn 1st Filing was determined officially needs data in 2008 (Keeley and Marmor 2007). It was treated as eligible during prior NEPA-level planning, so no intensive survey was completed (Lloyd et al. 2020). The Northglenn 1st Filing was the first part of the overall self-contained community of Northglenn. The various ranch-style plans and the few split-levels show the original trends in housing in post-war America. The subdivision is significant under Criterion A for its role in the development of Northglenn and for its representation of housing trends in the post-war era. The subdivision is affiliated with Perl-Mack; however, no significant member of Perl-Mack ever lived or occupied homes in the subdivision, so therefore, the subdivision lacks significance under Criterion B.

This subdivision contains several examples of ranch-type houses with minor variations, as well as a few split-levels. The ranch-type houses, with different models that provided options for homeowners, created a cohesiveness in the subdivision. Grant Park to the north and the church in the subdivision represent Perl-Mack's vision of a self-sufficient and family-oriented community. The subdivision is therefore significant under Criterion C for being an excellent example of a planned post-war subdivision in the Denver metro area. Further evaluation of the subdivision will not yield additional significant information about Northglenn or post-war development and therefore it is not eligible under Criterion D.

CDOT determined the subdivision is eligible for listing in the NRHP under Criteria A and C. Section 4(f) requirements apply to this eligible historic property.

5AM3778 North Star Hills Subdivision

North Star Hills Subdivision was determined officially eligible in 2019 (Lloyd et al. 2017). The subdivision is not significant under Criterion A because it does not have an association with any specific post-war housing trends (such as housing for veterans or ethnic-related housing), important planning principles, or specific movements or trends. It is also not significant under Criterion B, as no archival information could be connected between the subdivision and the life and career of a prominent developer, nor was it the home of anyone who made important contributions to the history of the locality and region. The subdivision is significant under Criterion C because it includes excellent examples of ranch-type, bi-level, and tri-level houses that are consistent with the post-war subdivision development. Most of these houses demonstrate all aspects of integrity. Further evaluation of the subdivision will not yield additional significant information about Thornton or post-war development and therefore it is not eligible under Criterion D.

CDOT determined the subdivision remains eligible for listing in the NRHP under Criterion C. Section 4(f) requirements apply to this eligible historic property.

5AM3779 Northview Estates Subdivision

Northview Estates Subdivision was determined officially eligible in 2019 (Lloyd et al. 2019). The subdivision is not significant under Criterion A because it does not have an association with any specific post-war housing trends (such as housing for veterans or ethnic-related

housing), important planning principles, or specific movements or trends. It is not significant under Criterion B, as no archival information could be connected between the subdivision and the life and career of a prominent developer, nor was it the home of anyone who made important contributions to the history of the locality and region. The subdivision is significant under Criterion C because it includes excellent examples of ranch-type houses that are consistent with the post-war subdivision development. Most of these houses demonstrate all aspects of integrity. Further evaluation of the subdivision will not yield additional significant information about the area or post-war development and therefore it is not eligible under Criterion D.

CDOT determined the subdivision remains eligible for listing in the NRHP under Criterion C. Section 4(f) requirements apply to this eligible historic property.

5AM3936 Northglenn Subdivision 3rd, 8th, 19th Filing

Northglenn Subdivision 3rd, 8th, 19th Filing was determined officially eligible in 2019 (Lloyd et al. 2018). The subdivision is significant under Criterion A because it is associated with the early self-sufficiency of the Northglenn community, including nearby shopping malls and schools, and is thus associated with the development of Northglenn. The subdivision is not significant under Criterion B, as no archival information could be connected between the subdivision and the life or career of a prominent developer, nor was it the home of anyone who made important contributions to the history of the locality and region.

The subdivision is also significant under Criterion C because it includes excellent examples of ranch-type, bi-level, tri-level, and 1½-story as well as full 2-story houses that are consistent with the post-war subdivision development. Most of these houses demonstrate all aspects of integrity. Further evaluation of the subdivision will not yield additional significant information about Northglenn or post-war development and therefore it is not eligible under Criterion D.

CDOT determined the subdivision remains eligible for listing in the NRHP under Criteria A and C. Section 4(f) requirements apply to this eligible historic property.

5AM3996 88th Avenue (including 5AM3996.3)

88th Avenue is likely significant under Criterion A because it is a late 1800s to early 1900s farm-to-market road that supported the early agricultural economy of the state. Portions of 88th Avenue are an early example of a farm-to-market road. There are no persons significant in our past associated with the road, making it not eligible under Criterion B. The road is not a good representation of an architectural type, period, or method of construction, nor is its design the work of a master architect or engineer, so 88th Avenue is not significant under Criterion C. Further evaluation of the road will not yield additional significant information about farm-to-market road construction or use and therefore it is not eligible under Criterion D.

Approximately 1.5 miles of the 4.85-mile-long segment 5AM3996.3 was constructed in the 1970s, decades after the period of significance for farm-to-market roads (1909-1942)

established by the **Colorado State Roads and Highways National Register of Historic Places Multiple Property Submission** (Autobee and Dobson-Brown 2003). The segment has not moved since its construction, so it has integrity of location. The road is now flanked by both I-25 and dense suburban development and therefore no longer has the setting or feeling of a rural farm-to-market road. Today, the road is used as a commuter thoroughfare and no longer has an association with transporting agricultural goods to markets. The segment's design was altered when the road was extended west of I-25 in the 1970s. The road has a standardized design that does not convey workmanship. The road's materials have been updated over the years, and the road has been repaved several times over, so integrity of materials is no longer maintained.

The entire length of 88th Avenue was not recorded and is therefore treated as potentially eligible for inclusion in the NRHP per OAHP guidelines. CDOT determined that segment 5AM3996.3 is non-supporting of the significance of the entire resource. Section 4(f) requirements apply to this eligible historic property.

5AM4335 Weingarten Farmstead

The Weingarten Farmstead is significant under Criteria A and B in the areas of invention and health/medicine because it is where the Weingartens and their friends collaboratively invented and designed the Porta-Lung. The Porta-Lung was an important technological improvement that gave users of iron lungs increased mobility and the ability to travel overnight. While the parcel is also associated with truck and dairy farming, which were important agricultural industries in Adams County in the nineteenth and twentieth centuries, there is no evidence to suggest that the farmstead made significant or important contributions to those industries (Criterion A).

The Weingarten Farmstead is also significant under Criterion B because Sunny and Walter Weingarten were living at property when they invented and patented the Porta-Lung. The Porta-Lung was an important contribution to the field of medical technology. The ranch house, relocated house, and large garage all contribute to the eligibility of the farmstead. The other features do not support the significance of the farmstead.

Like many agricultural properties, the Weingarten Farmstead developed over many decades and includes a variety of vernacular buildings. However, the suburban setting and multiple residences means the parcel is not a representative example of a farmstead. Only the brick ranch house has distinct characteristics of an architectural style or type. While the brick ranch house's single story was well suited to accommodate Sunny's physical disability, it is not a distinctive, transitional, or highly artistic example of the common building type. Therefore, CDOT recommends that the property is not significant under Criterion C.

Further investigation of the farmstead itself will not provide any additional information regarding agriculture in Adams County or the invention of the Porta-Lung, as such information is better gathered from archival research or additional interviews with the Weingarten family.

Additionally, the archaeological component of the site was destroyed when the demolished residence was scraped into two indistinguishable trash piles (Criterion D).

CDOT determined that the Weingarten Farmstead is eligible for listing in the NRHP under Criteria A and B. Section 4(f) requirements apply to this eligible historic property.

5AM4349 Pugnetti Residence

The residence is a single-family home that was not developed as part of a larger designed subdivision. It is not representative of significant housing trends in the post-war era, or any other general trends or events that are important to history. Therefore, the residence is not significant under Criterion A. Furthermore, the original Ferrero property is no longer intact as a farmstead. There is no archival evidence to suggest that the Ferrero family made important contributions to their community, so the property is not significant under Criterion B. The building is eligible under Criterion C because it is a good example of a ranch-type house. While not located in a post-war subdivision, the one-story residence still embodies the distinctive characteristics of the building type such as an asymmetrical façade, attached garage, low-pitched roof, overhanging eaves, picture window, wide chimney, picture window, and decorative porch supports. Further evaluation of the residence will not yield additional significant information about the development or architecture of the area and therefore it is not eligible under Criterion D.

CDOT determined that the Pugnetti Residence is eligible for listing in the NRHP under Criterion C. Section 4(f) requirements apply to this eligible historic property.

5AM4353 AMF Sonesta Lanes

AMF Sonesta Lanes was built over two decades after I-25 was constructed and therefore not associated with the primary driver of development patterns for the north Denver metro area. However, the bowling alley may be significant under Criterion A in the area of social history for being an important community gathering space in the late 1970s and 1980s. Interviews with community members and additional research are needed once the building is 50 years old. There are no persons significant in our past associated with AMF Sonesta Lanes, making it not eligible under Criterion B. The building is not a good representation of an architectural type, period, or method of construction, nor is it the work of a master, so it is not significant under Criterion C. Further evaluation of the building will not yield additional significant information about the commercial development of the area and therefore it is not eligible under Criterion D.

CDOT determined the resource needs data for listing in the NRHP. Section 4(f) requirements apply to this needs data historic property.

Table 2. Historic Properties in the APE

(Resource No.) Resource Name	Year Built	Address/Location	NRHP Eligibility
(5AM80) Lower Clear Creek Canal	Ca. 1861	From the South Platte River north to Brantner Ditch in Weld County	Eligible
Segment 5AM80.1	Ca. 1861	From the eastern terminus of segment 5AM80.6 underneath I-25 to the railroad west of Steele Street	Supporting
Segment 5AM80.6	Ca. 1861	From Broadway to the western terminus of segment 5AM60.1 underneath I-25	Non-supporting
(5AM2073) Northglenn Subdivision 1st Filing	1959	Between Washington Street and I-25, north of E 104th Avenue	Eligible
(5AM3778) North Star Hills Subdivision	1962-1969	Between W 88th Avenue, Niver Creek Trail, and Huron Steet	Eligible
(5AM3779) Northview Estates Subdivision	1960-1963	Between Washington Street and I-25	Eligible
(5AM3936) Northglenn Subdivision 3rd, 8th, 19th Filing	1959-1964	Between 104th Avenue, Bannock Street/I-25, Melody Drive, and Huron Street	Eligible
(5AM3996) 88th Avenue	Ca. 1890	88th Ave	Eligible
Segment 5AM3996.3	Ca. 1978	88th Ave between N Pecos St and the western extent of 5AM3996.1	Non-supporting
(5AM4335) Weingarten Farmstead	1913, 1937, 1958	501 E 80th Ave	Eligible
(5AM4349) Pugnetti Residence	1957	450 E 76th Ave	Eligible
(5AM4353) AMF Sonesta Lanes	1979	401 E 88th Ave	Needs data

4.2.3 Archaeological Resources Considered

According to OAHP records, four previous surveys overlap the APE but no known Indigenous or historical archaeological resources are present. Extensive urban development has destroyed most of the APE, limiting the potential for intact archaeological materials to a few undisturbed areas. A Class III survey and exploratory testing did not identify any archaeological resources in the APE. CDOT confirmed these findings based on the **Limited-Results Cultural Resource Survey Form**.

5.0 Environmental Consequences

This section assesses impacts on recreational and historic Section 4(f) resources and includes a determination of use.

5.1 No Action Alternative

The No Action Alternative would not require any new transportation use of historic or recreation properties and, as such, no Section 4(f) approvals by FHWA are required under this alternative.

5.2 Proposed Action

5.2.1 Recreation Resources

The Proposed Action would not impact the following recreational Section 4(f) resources: Civic Center Park Trail, Grange Creek Trail, North Creek Park, Niver Creek Trail - Access, Northstar Park, Northstar Elementary Trails, Thornton Parkway Trail, Eleanor M. Wyatt Park, Eleanor M. Wyatt Trail, or Clear Creek Trail. There would be no impact on these resources because they are not in the project area, no ROW would be acquired from these properties, and access to these resources would be maintained throughout and post-construction. Because the resources listed above would not be impacted, there would not be a Section 4(f) use of those resources.

Impacts would occur at the Niver Creek Open Space Trails, the Niver Creek Trail, and a portion of the Civic Center Park property with a transportation use. **Table 3** at the end of this section provides a summary of recreation impacts and Section 4(f) use determinations for all identified resources.

Civic Center Park

Approximately 0.7 acre of the City of Thornton property from the west end of Civic Center Park, which is a Section 4(f) resource, would be acquired for ROW as a part of the Proposed Action to accommodate highway widening (**Attachment B**); however, this portion of the property has a current transportation use and is outside the fence determined to mark the area of Civic Center Park that is available for recreational use (Photo 15). The impacted portion of the park property is located on the west side of the Civic Center Park fence nearest I-25, currently has a transportation use, is maintained by CDOT, and is not open to the public for park activities. The portion of the property on the east side of the fence has a recreational use, is maintained by the City of Thornton, is open to the public for park activities, and would not be impacted by the proposed ROW acquisition. The fence itself would not be impacted during construction and would be protected in place. The proposed ROW acquisition would allow for the widening of the highway and water quality improvements, as well as for continued maintenance of the shoulder and roadside swale by CDOT. No visual or noise impacts are anticipated on this resource. Impacts on the recreation portion of Civic Center Park would not occur; therefore, there would be no Section 4(f) use.

CDOT and the City of Thornton have coordinated for the transportation use of this property; the coordination letter is included as **Attachment C**.



Photo 15. Civic Center Park fence on the west side of the property, from I-25 (GoogleEarth, 2026)

Niver Creek Open Space Trails and the Niver Creek Trail

Highway widening would require realignment of the Niver Creek Trail up to 22 ft to the west of the existing trail, an average of roughly 8 ft offset from the existing trail (**Figure 4**). Permanent ROW acquisition would impact 0.35 mile of the Niver Creek Trail and less than 100 ft of the Niver Creek Open Space Trails to accommodate highway widening. The realignment of the Niver Creek Trail would be completed using a City of Thornton Construction Permit 2.25 acres in size; the trail would be replaced to its original condition and continue to be maintained by the City of Thornton.

A detour of the Niver Creek Trail, illustrated on **Figure 4** below, would take place temporarily during construction. This detour includes a short temporary trail to be constructed along the realignment area of the Niver Creek Trail. Trail users going south on the Niver Creek Trail would then be re-routed to the Niver Creek Open Space Trails, which would bring them across I-25 via 88th Avenue and south on Grant Street to reconnect with the Niver Creek Trail south of the Park-n-Ride on the east side of I-25 (**Figure 4**).

The Proposed Action includes reconstructing the trail connection between the Niver Creek Open Space Trails and the regional Niver Creek Trail, which would require removal of less than 25 linear ft of the existing Niver Creek Open Space Trails at the north end of the

realignment. The alignment shift of the trail would be completed using a City of Thornton Construction Permit. During construction of the trail connection, a temporary trail would be constructed to maintain continuity and limit the length of the detour. A temporary detour of approximately 1.26 miles would be required during construction (**Figure 4**). Prior to implementation of the detour, the public would be given notice, and clear signage would be in place for the duration of the detour. The total length of the Niver Creek Trail is approximately 2 miles, and the Niver Creek Open Space Trails total approximately 7 miles. The current Niver Creek Trail has an unsignalized crossing of the I-25 bus slip ramp south of 88th Avenue. The project proposes eliminating the slip ramps at this location, which would provide a safer pedestrian crossing of the Niver Creek Trail. Vegetation removal and staging near the trail may be required during project construction and would stay within the proposed project area shown on **Figure 2** and **Figure 3**.

No visual impacts are expected on this resource.

The project noise analysis identified noise impacts along the Niver Creek Trail from the Proposed Action; however, noise mitigation via noise wall(s) was not considered reasonable and feasible at this location. A Traffic Noise Technical Report was completed for the project and includes a full discussion of reasonable and feasible noise walls (CDOT, 2026).

FHWA is considering a Section 4(f) *de minimis* finding for impacts on the Niver Creek Open Space Trails and Niver Creek Trail. A *de minimis* impact is one that, after taking into account all minimization, mitigation, and enhancement measures, will not adversely affect the features, attributes, or activities qualifying the property for protection under Section 4(f) (23 CFR §774.17). While a temporary detour of approximately 1.26 miles would be necessary during construction, the impacted portions of the Niver Creek Trail would be replaced in kind and all areas restored to preconstruction conditions. Prior to implementation of the detour, the public would be given notice and clear signage would be in place for the duration of the detour.

The OWJ, Thornton Parks and Recreation, has been informed of the intent to make a *de minimis* impact finding. Public review and comment will be solicited through the Environmental Assessment public comment process. Following the comment period, comments will be considered and the intent to make a *de minimis* impact finding will be reassessed. If, after the comment period, the intent is still a *de minimis* finding, the OWJ will be requested to provide written concurrence agreeing with the *de minimis* impact finding. Following this process, FHWA may make a final determination on the *de minimis* impact finding.

Figure 4. Proposed Shift and Detour of the Niver Creek Trail

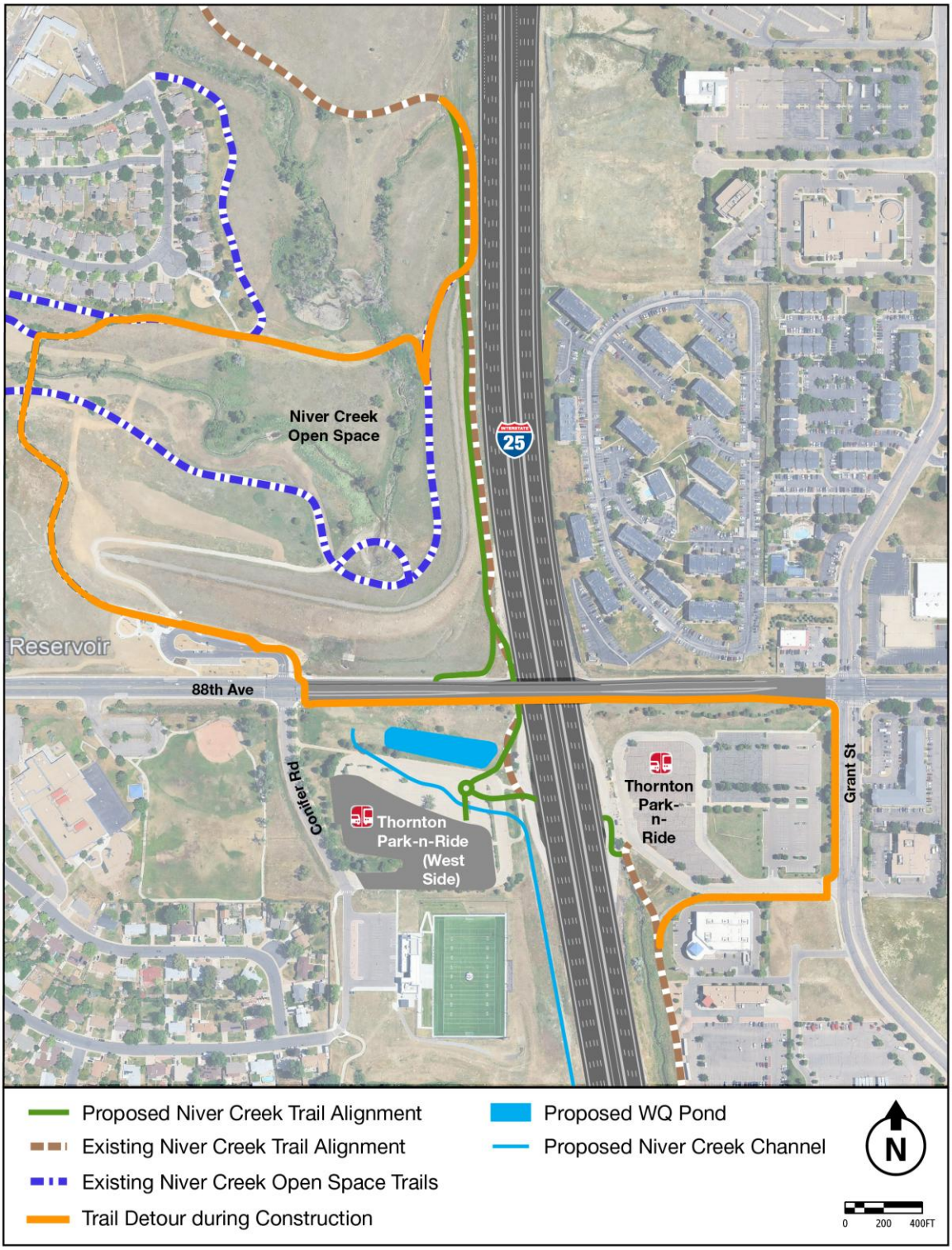


Table 3. Summary of Recreational Section 4(f) Uses for Existing Resources

Resource Name	Recreational Impact	Section 4(f) Use
Eleanor M. Wyatt Park	No	No
Eleanor M. Wyatt Trail	No	No
Grange Creek Trail	No	No
Grant Park	No	N/A – Not Section 4(f)
Civic Center Park Trail	No	No
Civic Center Park	Yes	No
Badding Reservoir	No	N/A – Not Section 4(f)
North Mor Elementary School	No	N/A – Not Section 4(f)
Badding Open Space	No	N/A – Not Section 4(f)
Thornton Parkway Trail	No	No
Niver Creek Trail	Yes	Yes – *De Minimis*
North Creek Park	No	No
Niver Creek Open Space	Yes	N/A – Not Section 4(f)
Niver Creek Open Space Trails	Yes	Yes – *De Minimis*
Northstar Park	No	No
Northstar Elementary Trails	No	No
Pinnacle Athletic Complex	No	N/A – Not Section 4(f)
Niver Creek Trail – Access	No	No
Niver Tributary L Open Space	No	N/A – Not Section 4(f)
Clear Creek Trail	No	No

5.2.2 Historical Built Environment Resources

The Proposed Action would result in a new transportation use of four historic properties. Brief summaries of the impacts on those four historic properties and Section 4(f) findings are provided below. A summary of the Section 4(f) findings is included in **Table 4**. CDOT received a signed Section 4(f) *de minimis* clearance form from FHWA on June 30, 2025 regarding the four historic properties (**Attachment E**).

5AM80 Lower Clear Creek Canal (including 5AM80.1 and 5AM80.6)

Segment 5AM80.6 is not within the limits of disturbance of the Proposed Action but approximately 960 ft of segment 5AM80.1 of the Lower Clear Creek Canal is within the limits of disturbance. Of that 960 ft, 925 ft are currently piped underground beneath I-25, and 35 ft are an earthen channel. The proposed highway improvements would take place where the canal is piped underground. The highway improvements overlap approximately 0.28 acre of segment 5AM80.1's boundary, though the canal itself would not be directly impacted by these improvements.

The SHPO concurred with CDOT's "no adverse effect" determination for this historic property. Consistent with Section 4(f) regulations [23 CFR 774.5(a)(ii)) and 774.7 (b)], FHWA can make a *de minimis* finding when a use of a historic property results in a no adverse effect determination under the Section 106 process. The finding of no adverse effect on 5AM80, including segments 5AM80.1 and 5AM80.6, reflects a conclusion that the effects would not "alter, directly or indirectly, any of the characteristics of [the] historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling or association" as described in 36 CFR 800.5(a)(1).

Given the efforts undertaken to minimize impacts on historic properties and CDOT's no adverse effect finding for the Lower Clear Creek Canal, FHWA made a *de minimis* finding for this property.

5AM3778 North Star Hills Subdivision

Minor modifications would be made to Conifer Road to tie in its intersection with 88th Avenue after the 88th Avenue bridge is replaced. These modifications may include minimal roadway grading; the replacement of asphalt pavement, concrete sidewalks, curbs, and gutters; and modifications to storm drains, lighting, and landscaping. North Star Hills Subdivision would be directly impacted by the Proposed Action because a 547-square-ft ROW acquisition is needed to complete the modifications to Conifer Road. This small ROW acquisition is on the far northeast corner of the subdivision's boundary in Northstar Park behind the baseball diamond of North Star Elementary School. The ROW acquisition makes up less than 0.02 percent of the 70.5-acre subdivision. The minor modifications would not impact the subdivision's character-defining features of cohesive suburban house types, curvilinear streets, cul-de-sacs, and proximity to a local school. The residential, educational, and recreational uses of the North Star Hills Subdivision would also not be altered by this ROW acquisition. No new materials or landscaping would be introduced. Therefore, the North Star Hills Subdivision's integrity of setting, materials, workmanship, design, association, feeling, and location would not be significantly altered.

The SHPO concurred with CDOT's "no adverse effect" determination for this historic property. Consistent with Section 4(f) regulations [23 CFR 774.5(a)(ii)) and 774.7 (b)], FHWA can make a *de minimis* finding when a use of a historic property results in a no adverse effect determination under the Section 106 process. The finding of no adverse effect on 5AM3778 reflects a conclusion that the effects would not "alter, directly or indirectly, any of the characteristics of [the] historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling or association" as described in 36 CFR 800.5(a)(1).

Given the efforts undertaken to minimize impacts on historic properties and CDOT's no adverse effect finding for the North Star Hills Subdivision, FHWA made a *de minimis* finding for this property.

5AM3779 Northview Estates Subdivision

Approximately 265 ft of an existing noise abatement wall would be replaced behind the residence at 194 Grant Way in the Northview Estates Subdivision to accommodate the widening of the highway. This wall would function as both a noise barrier and a retaining wall. The wall would be approximately 12 ft high. No increases in noise are anticipated from the Proposed Action. CDOT would acquire a 1,141-square-ft permanent easement from 194 Grant Way to build and maintain the wall. The easement would be 8 ft wide and would overlap an existing 10-ft-wide utility easement that was part of the subdivision's original platting (Washington Heights Incorporated 1960). Like the existing utility easement, the

proposed permanent easement would restrict the owners of 194 Grant Way from constructing any permanent structures in that easement area.

The replacement wall along the backyard of 194 Grant Way would be a minor alteration in the visual setting of the subdivision. The Northview Estates Subdivision was built between 1961 and 1963 after the construction of I-25. The highway has always been part of the subdivision's suburban setting and feeling. A fence has extended along the parcel's backyard since the lot was developed, and a landscaping retaining wall and noise abatement wall were both added by the 1990s (Nationwide Environmental Title Research, 2026). Furthermore, the Northview Estates Subdivision is **eligible** under Criterion C for its cohesive grouping of ranch-type houses. The construction of the replacement wall in the backyard of 194 Grant Way would not alter the design, workmanship, or materials of one of the subdivision's ranch-type houses. The residence at 194 Grant Way would be physically unaltered and still contribute to the subdivision's architectural significance. Additionally, the tall wooden fence and mature vegetation surrounding the parcel would largely obscure any view of the replacement wall from Grant Way. In conclusion, no significant impacts are anticipated from increases in noise or changes in the visual setting of the area.

The SHPO concurred with CDOT's "no adverse effect" determination for this historic property. Consistent with Section 4(f) regulations [23 CFR 774.5(a)(ii)) and 774.7 (b)], FHWA can make a *de minimis* finding when a use of a historic property results in a no adverse effect determination under the Section 106 process. The finding of no adverse effect on 5AM3779 reflects a conclusion that the effects would not "alter, directly or indirectly, any of the characteristics of [the] historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling or association" as described in 36 CFR 800.5(a)(1).

Given the efforts undertaken to minimize impacts on historic properties and CDOT's no adverse effect finding for the Northview Estates Subdivision, FHWA made a *de minimis* finding for this property.

5AM3996 88th Avenue (including 5AM3996.3)

The Proposed Action would replace the 88th Avenue bridge. The new bridge will be constructed in place of the existing bridge to accommodate the proposed widened I-25 roadway. The highway would be widened to accommodate a fourth southbound general-purpose lane and a new northbound climbing lane, widen the buffers of the existing northbound and southbound express lanes, create continuous northbound and southbound auxiliary lanes, and widen the inside and outside shoulders to at least 10 ft wide. The new bridge would be approximately 6 ft 9 inches higher than the existing bridge. Segment 5AM3996.3 of 88th Avenue would be reconstructed slightly to tie in with the new bridge. This reconstruction would include some roadway grading; replacement of asphalt pavement and concrete sidewalks, curbs, medians, and gutters; and modifications to storm drains, lighting, and landscaping. While the width of the 88th Avenue roadway would not change, the sidewalks may be widened to align with the sidewalks of the new bridge. The alignment of

the roadway would not change. Because most of segment 5AM3996.3 was constructed in the 1970s, it does not support the overall NRHP eligibility of 88th Avenue.

The SHPO concurred with CDOT's "no adverse effect" determination for this historic property. Consistent with Section 4(f) regulations [23 CFR 774.5(a)(ii)) and 774.7 (b)], FHWA can make a *de minimis* finding when a use of a historic property results in a no adverse effect determination under the Section 106 process. The finding of no adverse effect on 5AM3996, including segment 5AM3996.3, reflects a conclusion that the effects would not "alter, directly or indirectly, any of the characteristics of [the] historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling or association" as described in 36 CFR 800.5(a)(1).

Given the efforts undertaken to minimize impacts on historic properties and CDOT's no adverse effect finding for 88th Avenue, FHWA made a *de minimis* finding for this property.

Table 4. Section 4(f) Evaluations of the Historical Built Environment Resources

(Resource No.) Resource Name	Section 4(f) Use
(5AM80) Lower Clear Creek Canal	*De Minimis*
Segment 5AM80.1	N/A
Segment 5AM80.6	N/A
(5AM3778) North Star Hills Subdivision	*De Minimis*
(5AM3779) Northview Estates Subdivision	*De Minimis*
(5AM3996) 88th Avenue	*De Minimis*
Segment 5AM3996.3	N/A

5.2.3 Archaeological Resources

An archaeological assessment of the APE identified no archaeological historic properties eligible for or listed in the NRHP and CDOT determined a finding of "no historic properties affected" for the undertaking. The SHPO concurred with this finding.

The project would not require any new transportation use of archaeological historic properties. Therefore, Section 4(f) approvals are not required for archaeological resources.

6.0 Mitigation

Table 5 documents the mitigation commitments for Section 4(f) resources associated with the Proposed Action.

Table 5. Mitigation Commitments

Activity Causing Impact	Location of Activity	Impact	Mitigation Commitment	Responsible Branch	Timing/Phase of Mitigation Implementation
Trail realignment	Niver Creek Trail	The Proposed Action includes realigning the Niver Creek Trail.	An IGA would be required between CDOT and the City of Thornton for the project. Coordination with the OWJ, City of Thornton Open Space and Project Management Division, will continue during final design and construction. All disturbed areas would be re-landscaped post-construction.	CDOT Design CDOT Construction	Construction Post-Construction
Pedestrian underpass replacement under I-25 at the Thornton Park-n-Ride	Niver Creek Trail	The Proposed Action requires temporary closure of 0.35 miles and a detour of 1.15 miles of the Niver Creek Trail.	Detour information will be posted prior to project construction to inform Niver Creek Trail users of the detour information. During construction, the detour will be clearly marked.	CDOT Design CDOT Construction	Design Construction
Trail reconstruction	Intersection of Niver Creek Open Space Trails and the Niver Creek Trail	The Proposed Action includes reconstructing the trail connection between the Niver Creek Open Space Trails and Niver Creek Trail, which would require removing a small portion (less than 25 ft) of the existing Niver Creek Open Space Trails at the north end of the realignment of the Niver Creek Trail.	Coordination with the official with jurisdiction (OWJ), City of Thornton Open Space and Project Management Division, is ongoing and will continue during final design and construction. BMPs will be employed to avoid and minimize impacts from construction. All disturbed areas will be re-landscaped post-construction. A temporary trail will be constructed to limit the detour length.	CDOT Design CDOT Construction	Design Construction Post-Construction

Activity Causing Impact	Location of Activity	Impact	Mitigation Commitment	Responsible Branch	Timing/Phase of Mitigation Implementation
Construction activities	Throughout project area	The Proposed Action includes noise impacts on recreational users.	The Contractor shall notify neighbors in advance when construction noise may occur, in accordance with the public information plan that will be developed for construction. The Contractor shall keep noisy activities as far from sensitive receptors as possible and coordinate with the Project Engineer. The Contractor shall keep exhaust systems on equipment in good working order, subject to inspection by the construction Project Manager to ensure maintenance is being conducted. The Contractor shall use properly designed engine enclosures and intake silencers, if appropriate. The Contractor shall place stationary equipment as far from sensitive receptors as possible and coordinate with the Project Engineer. The Contractor shall perform construction activities in noise-sensitive areas during hours that are least disturbing to nearby residents, generally daytime hours, as feasible. The Contractor shall locate haul roads so that they are as minimally disruptive as possible and coordinate with the Project Engineer. The Contractor shall provide a mechanism for complaints. Mechanisms will be determined during final design and may include a project hotline number or other mechanisms.	Contractor	Construction

7.0 Required Permits and Clearance Needs

The following consultations are required as part of the Proposed Action and would be completed prior to issuance of a decision document for the project:

- *De minimis* letter concurrence from the OWJ, and approval from FHWA, for Section 4(f) use of the Niver Creek Trail.
- *De minimis* letter concurrence from the OWJ, and approval from FHWA, for Section 4(f) use of the Niver Creek Open Space Trails.

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Attachment A.

Project Information

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Attachment A: Project Information

October 23, 2026 - Version 15

Subaccount number: 25563

BACKGROUND

The Colorado Department of Transportation (CDOT) and the Federal Highway Administration (FHWA) are proposing transportation improvements to Interstate 25 (I-25) between United States Highway 36 (US 36)/I-270/I-76 interchange and 104th Avenue.

Project History

CDOT has previously completed an Environmental Impact Statement (EIS), a Planning and Environmental Linkages (PEL) study, a safety audit, previous National Environmental Policy Act (NEPA)-level planning, and supplemental operational and transit and safety analyses that recommended improvements to this segment of I-25.

Some of the previously recommended improvements have been constructed, like the Express Lanes approved in the **North I-25 Record of Decision 1** (ROD1) (FHWA and CDOT, 2011), while others have not yet been implemented. The current Project evaluates proposed transportation improvements that reflect and build upon previous recommendations.

Because the current Project includes elements that were not evaluated and approved in the **North I-25 ROD1**, this Project is undergoing new evaluation under the National Environmental Policy Act.

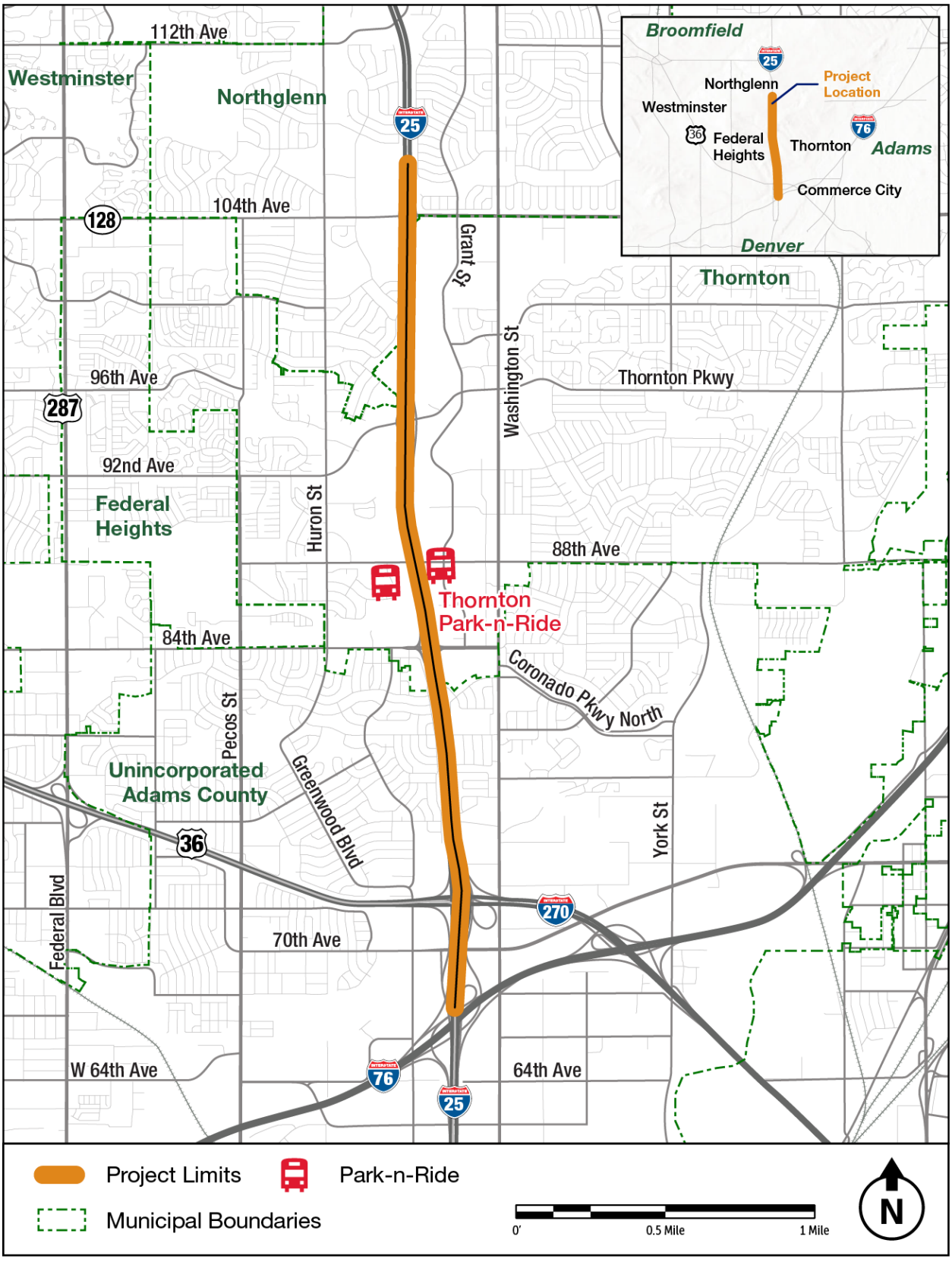
Study Area

The Project limits, illustrated in **Figure 1**, extend along I-25 from the US 36/I-76/I-270 interchange to 104th Avenue. It includes portions of US 36 and I-270, major arterials crossing I-25, and areas of potential drainage improvements. The study area for the Project varies by resource. Each resource's study area is defined within its corresponding technical report or memorandum.

The interchanges included in the Project limits are:

- I-25/US 36/270/I-76
- I-25/84th Avenue
- I-25/88th Transit Slip Ramps
- I-25/Thornton Parkway
- I-25/104th Avenue

Figure 1. Project Limits



PURPOSE AND NEED

The purpose of the Project is to improve I-25 between US 36 and 104th Avenue to address safety concerns and traffic operations.

The Project is needed to:

- Improve safety
- Improve traffic operations

In addition to addressing Project needs, the Project also has the following goal:

- Minimize environmental and community impacts caused by the Project

PROPOSED ACTION

The Project would improve approximately five miles of I-25 between US 36 and 104th Avenue. All lanes are 12 feet in width unless otherwise noted. The current cross-section of this segment of I-25 includes:

- Three general-purpose travel lanes in each direction
- One Express Lane in each direction, along the inside shoulder, separated from the adjacent general-purpose lane by a 2-foot buffer
- A southbound auxiliary lane between the 84th Avenue and US 36 interchanges
- A southbound auxiliary lane between the 88th Avenue transit slip ramp and the 84th Avenue interchange
- A northbound auxiliary lane between the 88th Avenue transit slip ramp and Thornton Parkway interchange
- Inside shoulders varying in width between 2 and 12 feet and outside shoulders varying in width between 6 and 12 feet

The Proposed Action on I-25 between US 36 and 104th Avenue, illustrated in **Figure 2**, includes the general-purpose and Express Lanes listed above and adds the following elements to the existing cross-section:

- A new 12-foot wide southbound general-purpose lane from 104th Avenue to south of 84th Avenue (all new lanes will be 12 feet in width)
- A new northbound climbing lane from the I-76 entrance ramp to 104th Avenue
- An expanded buffer of 4 feet between the Express Lane and the adjacent general-purpose lane
- A new continuous auxiliary lane southbound between the 84th Avenue and Thornton Parkway interchanges
- New continuous northbound auxiliary lanes between the interchanges at I-270 and 84th Avenue, 84th Avenue and Thornton Parkway, and Thornton Parkway and 104th Avenue
- Expanded inside and outside shoulders with typical 10-foot widths, and minimum 6.5-foot inside and 7-foot width in restricted locations

In addition to those changes to the cross-section, the Proposed Action would include the following elements:

- Realignment of the combined I-76 and US 36 on-ramp connection
- Expansion of the I-270 exit to northbound I-25 from one to two lanes; I-270 merge with I-25 shifted farther north (See **Figure 3**)
- Removal of bus-only slip ramps along I-25 at the Thornton Park-n-Ride facilities
- Changes to the Park-n-Ride west parking lot including reduction in size and reconstruction of circulation widths, sidewalks, and median areas to accommodate the proposed open channel of Niver Creek
- Changes to the Park-n-Ride east parking lot including reconstruction of bus bays and relocated shelters and amenities
- Replacement of the 88th Avenue bridge over I-25; wider to accommodate improved bicycle and pedestrian facilities and longer to accommodate I-25 widening

- Realignment of the I-25 adjacent existing trail and pedestrian network within the Niver Creek Open Space and its connections to the Thornton Park-n-Ride facilities (see **Figure 4**)
- Replacement of the aging pedestrian and bikeway underpass at the Thornton Park-n-Ride facility
- Removal of Niver Creek from the existing box culvert at the Thornton Park-n-Ride and conversion of the creek into an open channel
- Relocation of the segment of Niver Creek east of I-25, which currently flows south from the Park-n-Ride east parking lot to the creek's intersection with Tributary L, to the west side of I-25
- New water quality treatment features throughout the project area

Figure 2. Proposed Action

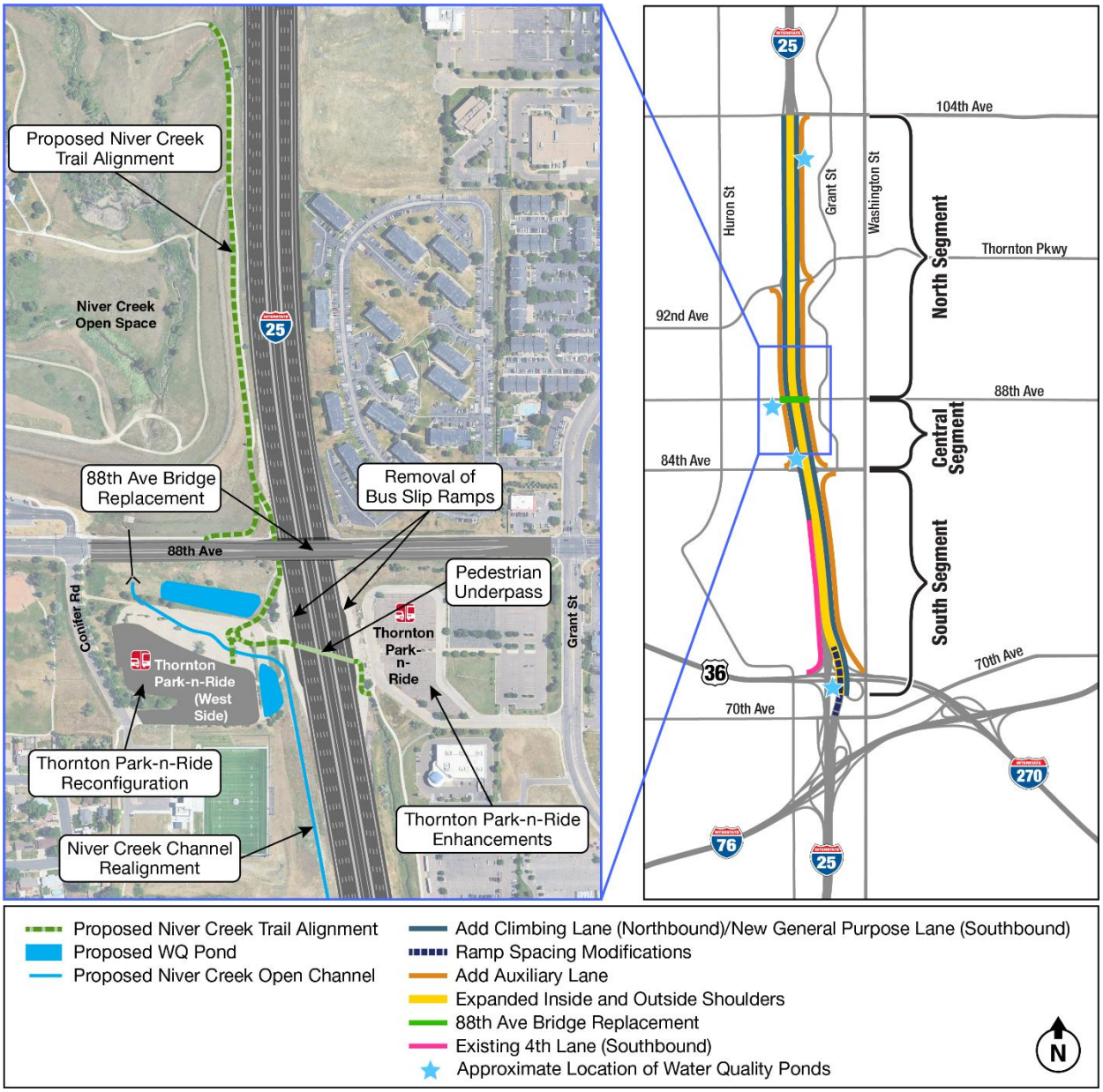


Figure 3. Proposed Improvements to I-270 Exit to NB I-25

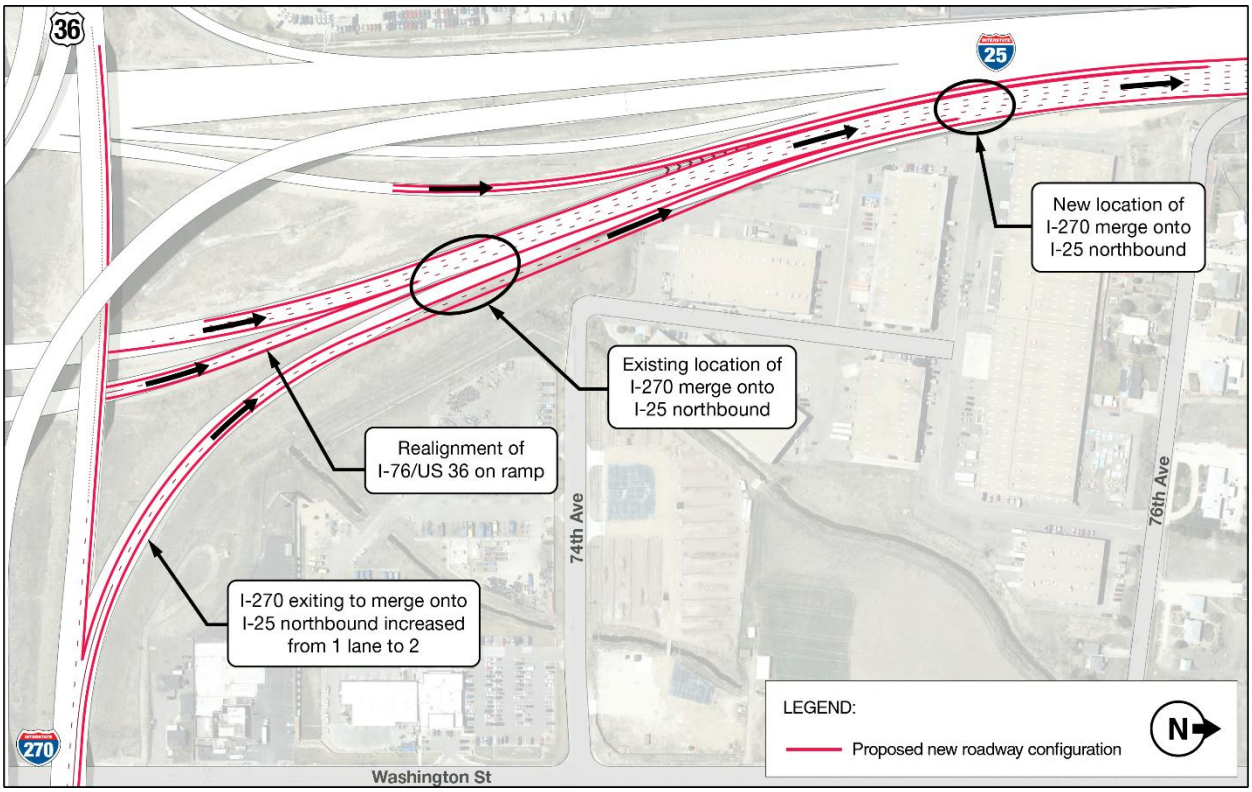
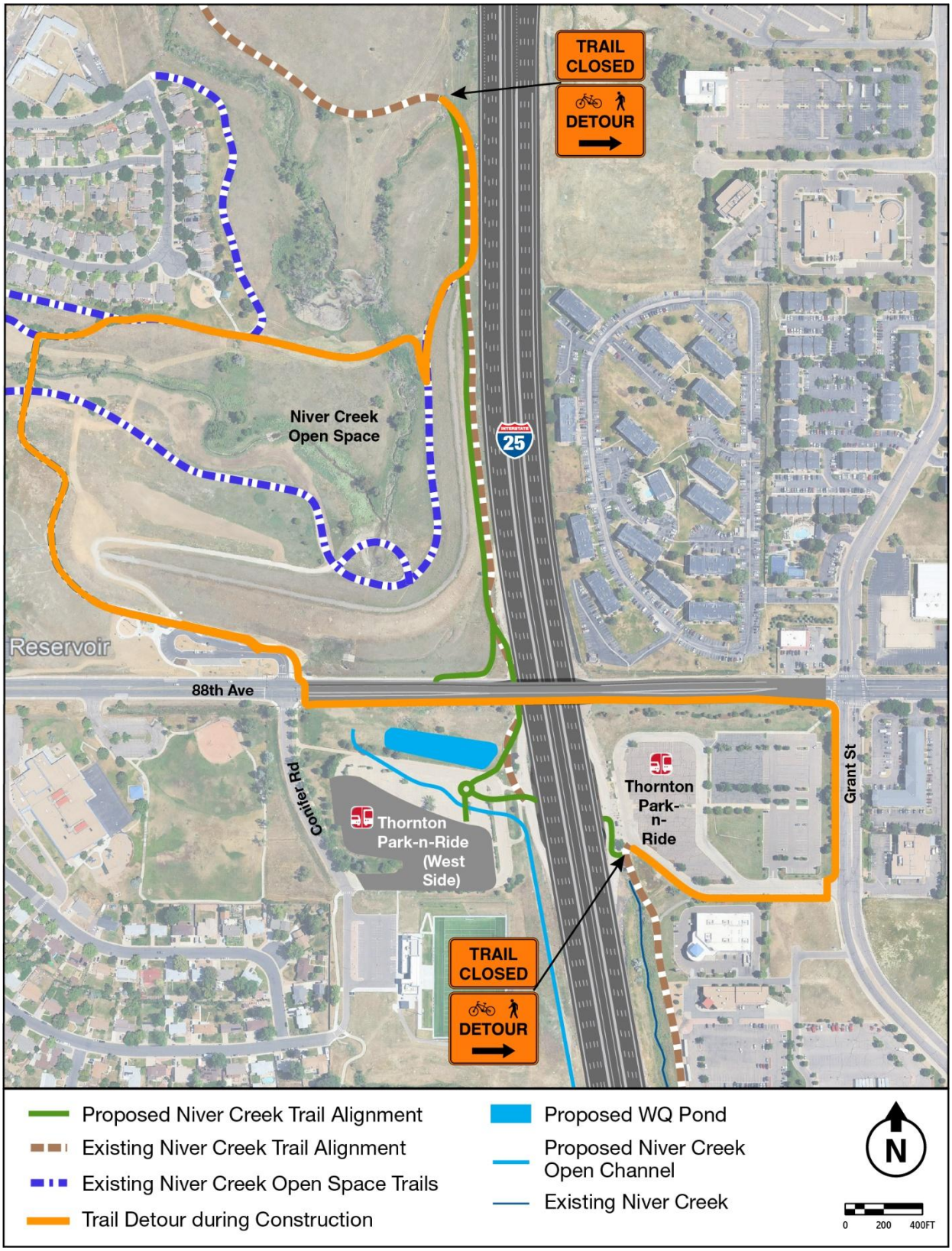


Figure 4. Proposed Realignment of Niver Creek Trail



Attachment B.

Proposed ROW

Attachment B. Proposed ROW

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Attachment C.

Coordination Letter

Attachment C. Coordination Letter

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Attachment D.

APE Figure

Attachment D. APE Figure

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Attachment E.

Historic Section 4(f) *De Minimis* Use Clearance Form

Attachment E. Historic Section 4(f) *De Minimis* Use Clearance Form

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