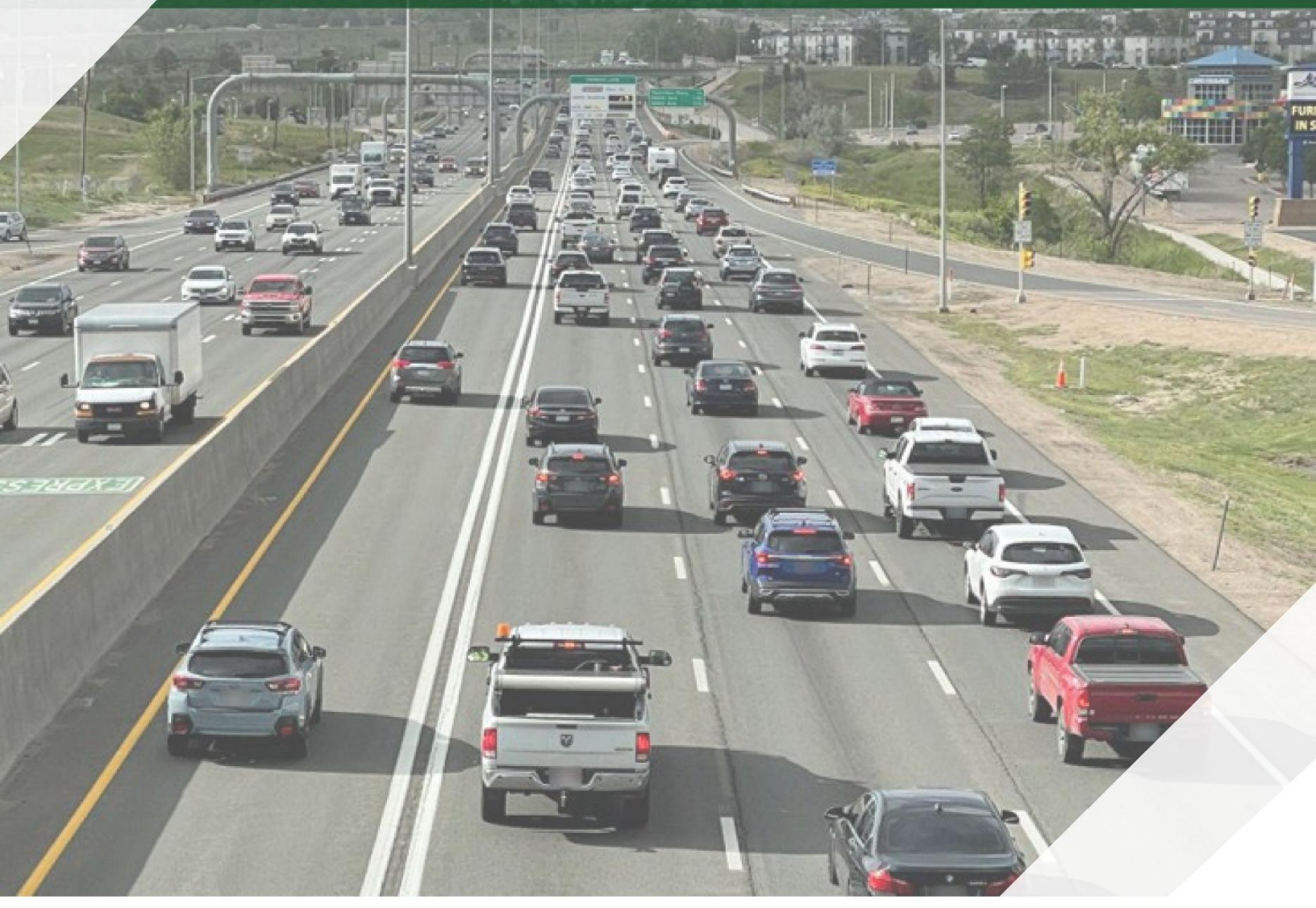
I-25 (US 36 to 104th Avenue)

Safety and Operations Improvements Project



Appendix D6: Recreation and Section 6(f) Resources Technical Report

August 2026

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Appendix D6. Recreation and Section 6(f) Technical Report

August 5, 2026 – Version 6
Project Number: PM 0253-299
Subaccount Number: 25563

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Attachments

Attachment A Project Information
Attachment B Proposed ROW

Acronyms and Abbreviations

Acronym or 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
LWCF	Land and Water Conservation Fund
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

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1.0 Introduction and Background

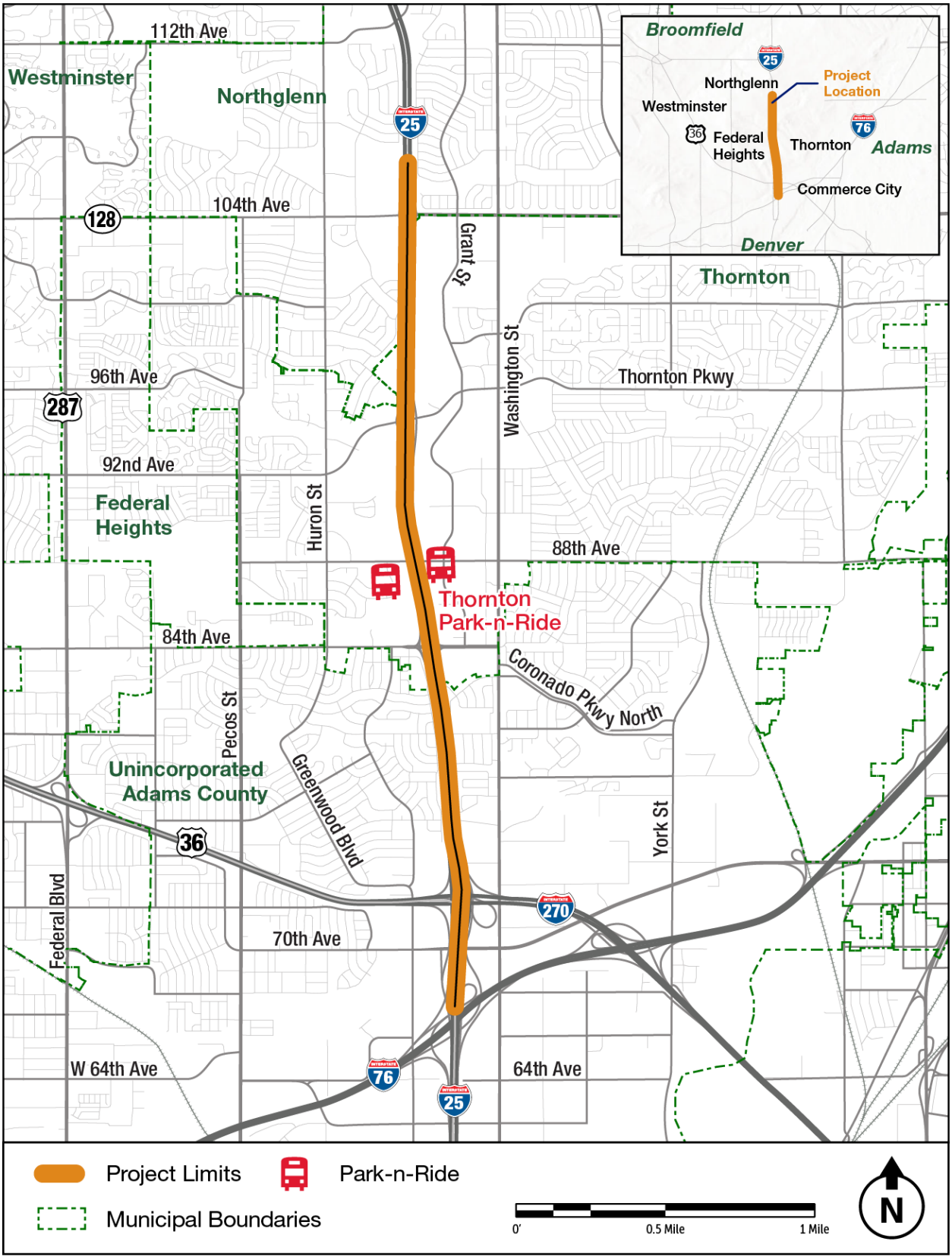
The Colorado Department of Transportation (CDOT) and Federal Highway Administration (FHWA) are proposing transportation improvements to Interstate 25 (I-25) between United States Highway 36 (US 36)/I-270/I-76 interchange and 104th Avenue (**Figure 1**). This Recreation and Section 6(f) Technical Report (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 Recreation

2.1.1 Local Agency Recreation Management

Recreation resources are also subject to local regulations, including those enforced by agencies that develop and manage recreation resources, city and county planning documents, and other local regulations that may apply to recreation resources. The project area corridor runs through the City and County of Denver, the City of Thornton, the City of Northglenn, and Adams County.

Local departments that oversee recreation resources in the project area include Adams County Parks, Open Space, and Cultural Arts; City of Thornton Parks and Recreation; City and County of Denver Parks and Recreation; and City of Northglenn Parks and Open Space. Planning documents referenced for this analysis include:

- Advancing Adams - Parks, Open Space and Trails Plan (Adams County, 2022)
- City of Thornton Parks and Open Space Master Plan (City of Thornton, 2017a)
- City and County of Denver's Parks Legacy Plan (City and County of Denver, 2021)
- City of Northglenn's Open Space Management Plan (City of Northglenn, 2010)
- City of Northglenn's Parks and Recreation Master Plan (City of Northglenn, 2017)

Resources managed by the City of Thornton are managed for residents to enjoy aesthetically and personally. The City of Thornton's Parks and Open Space Master Plan (master plan) outlines the idea of parks and trails throughout the City of Thornton being interconnected and creating a "string of pearls" (City of Thornton, 2017a). The pearls provide an opportunity for both passive and active recreation. The master plan also highlights the importance of the historic and environmental assets in the City of Thornton and names the South Platte River and Niver Creek as vital resources. The "string of pearls" concept in the master plan means that the goal is for an interconnected citywide system of parks, recreation facilities, trails, boulevards, and open space that provides for a diversity of recreational opportunities in the community. The overall vision of the master plan is to create an integrated system of parks, recreation facilities, trails, and open space that will:

- Provide recreational and cultural opportunities for all residents;
- Be equitably distributed, to the extent possible, throughout the community;
- Connect neighborhoods, parks, schools, recreation facilities, and business districts;
- Preserve the heritage and quality of life in the City of Thornton;
- Enhance and build upon the City of Thornton's environmental assets; and
- Enhance the community's identity.

Guidance for resources managed by the City of Northglenn is outlined in the Parks and Recreation Master Plan (City of Northglenn, 2017). The mission statement of the Parks and Recreation Advisory Board is to "...provide high quality recreation programs, parks, facilities,

special events and community engagement opportunities to create community interaction, promote physical health and wellbeing and enhance the quality of life for residents and participants" (City of Northglenn, 2017).

2.2 Section 6(f) Resources

The Land and Water Conservation Fund (LWCF) Act of 1965 is codified in 54 United States Code §200305(f)(3) and provides matching grants to state and local governments for the acquisition and development of public outdoor recreation areas and facilities. The LWCF Act is intended to create and maintain a nationwide legacy of high-quality recreation areas and facilities and to stimulate nonfederal investments in the protection and maintenance of recreation resources across the United States. Section 6(f)(3) of the LWCF Act prohibits the conversion of property acquired or developed with grants from this fund to a nonrecreational purpose without the approval of the United States Department of the Interior National Park Service (NPS) and identification of replacement lands of equal value, location, and usefulness.

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 used for the transportation project.

2.2.1 Section 6(f) Properties

When applying for a LWCF grant, state and local governments must include in the application a boundary map that 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).

Colorado Parks and Wildlife (CPW) maintains a Geographic Information System (GIS) database of Section 6(f) properties in Colorado that contains polygons representing the official LWCF grant boundary (LWCF, 2024). The database also includes the grant ID, the year the grant was approved, and a description of the recreation improvements that were completed using the LWCF grant. This GIS database is hosted in CDOT's Online Transportation Information System and is available to the public.

2.2.2 Conversions under Section 6(f)

A Section 6(f) conversion is a federal action subject to NPS NEPA processes and compliance with other federal laws (CDOT, 2023). Conversion of Section 6(f) land 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 for the NPS to consider a formal conversion request.

3.0 Methodology

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 6(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). LWCF properties were identified using the LWCF website mapper tool and verified using CDOT's ArcGIS Online Mapper, which is maintained by Colorado Parks and Wildlife (LWCF, 2024; CDOT, 2025).

Direct impacts on resources were identified by overlaying the project area for the Proposed Action on maps showing the Section 6(f) and recreation resources and identifying areas of overlap. Indirect impacts were evaluated by identifying changes in access, noise levels, and views on recreation 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 6(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



4.0 Existing Conditions

4.1 Resources Considered

Resources detailed below were considered as part of this recreational analysis. **Table 1** provides a summary of each resource and identifies whether each park, recreation area, and open space resource is protected under Section 6(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).

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.

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)

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)

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)

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)

Grange Creek Trail

The entire Grange Creek Trail is more than 6.5 miles; 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)

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)

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.

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)

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.

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.

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)

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.

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)

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)

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 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)

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)

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.

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)

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 6(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.	City of Northglenn	No
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.	City of Northglenn	No
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.	City of Thornton	No
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. Development of this park was funded through the State and Local Assistance Program with the LWCF; therefore, Grant Park is a protected Section 6(f) resource.	City of Northglenn	Yes
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.	City of Thornton	No
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.	City of Thornton	No
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.	City of Thornton	No
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.	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.	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.	City of Thornton	No

Map I #	Resource Name	Size/Location	Resource Type/ Description	Managed By	Section 6(f)
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 feet 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.	City of Thornton	No
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.	City of Thornton	No
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.	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.	City of Thornton	No
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.	City of Thornton	No
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.	City of Thornton	No
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.	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.	City of Thornton	No
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.	City of Thornton	No

Map I #	Resource Name	Size/Location	Resource Type/ Description	Managed By	Section 6(f)
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 trail was also built or updated using LWCF funding and is therefore protected under Section 6(f).	Adams County Parks and Open Space	Yes

5.0 Environmental Consequences

This section assesses impacts on recreation resources and includes a determination of use for resources subject to Section 6(f).

5.1 No Action Alternative

The No Action Alternative would have no impact on existing parks, recreation, and open space parcels because no transportation infrastructure would be constructed.

5.2 Proposed Action

The Proposed Action would not impact the following recreation resources: Civic Center Park Trail, Badding Reservoir, Badding Open Space, Grange Creek Trail, North Creek Park, Niver Tributary L Open Space, Niver Creek Trail - Access, Northstar Park, Northstar Elementary Trails, Thornton Parkway Trail, Pinnacle Athletic Complex, North Mor Elementary School, Grant Park, 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. Additionally, there would be no impacts to resources protected under Section 6(f).

5.2.1 Recreational Impacts

Niver Creek Open Space

The Proposed Action includes acquiring approximately 1 acre of property from the east edge of the Niver Creek Open Space for a permanent ROW acquisition to accommodate highway widening. Other improvements at the open space, including the alignment shift of the trail in the open space, would be completed using a City of Thornton Construction Permit totaling 2.25 acres, as shown in **Attachment B**. The total area of the Niver Creek Open Space is approximately 63 acres; therefore, the permanent acquisition would represent approximately 0.16 percent of the total open space. Vegetation removal and grading would occur in the Niver Creek Open Space, along with other temporary impacts such as construction staging. These activities would be confined to the proposed project area as shown in **Attachment B**. Although some vegetation and land area would be affected by the Proposed Action, the project would not substantially alter the use or overall function of the Niver Creek Open Space; thus, the impact on the open space is considered to be minimal.

The project noise analysis identified noise impacts in the Niver Creek Open Space resulting from the Proposed Action; however, noise mitigation via a 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).

Civic Center Park

Approximately 0.7 acre of the City of Thornton property from the west end of Civic Center Park would be acquired for ROW as a part of the Proposed Action to accommodate highway widening (**Attachment B**). 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 (Photo 15). 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 road 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.



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 feet to the west of the existing trail, an average of roughly 8 feet offset from the existing trail (**Figure 4**). Permanent ROW acquisition would impact 0.35 mile of the Niver Creek Trail and less than 100 feet 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.

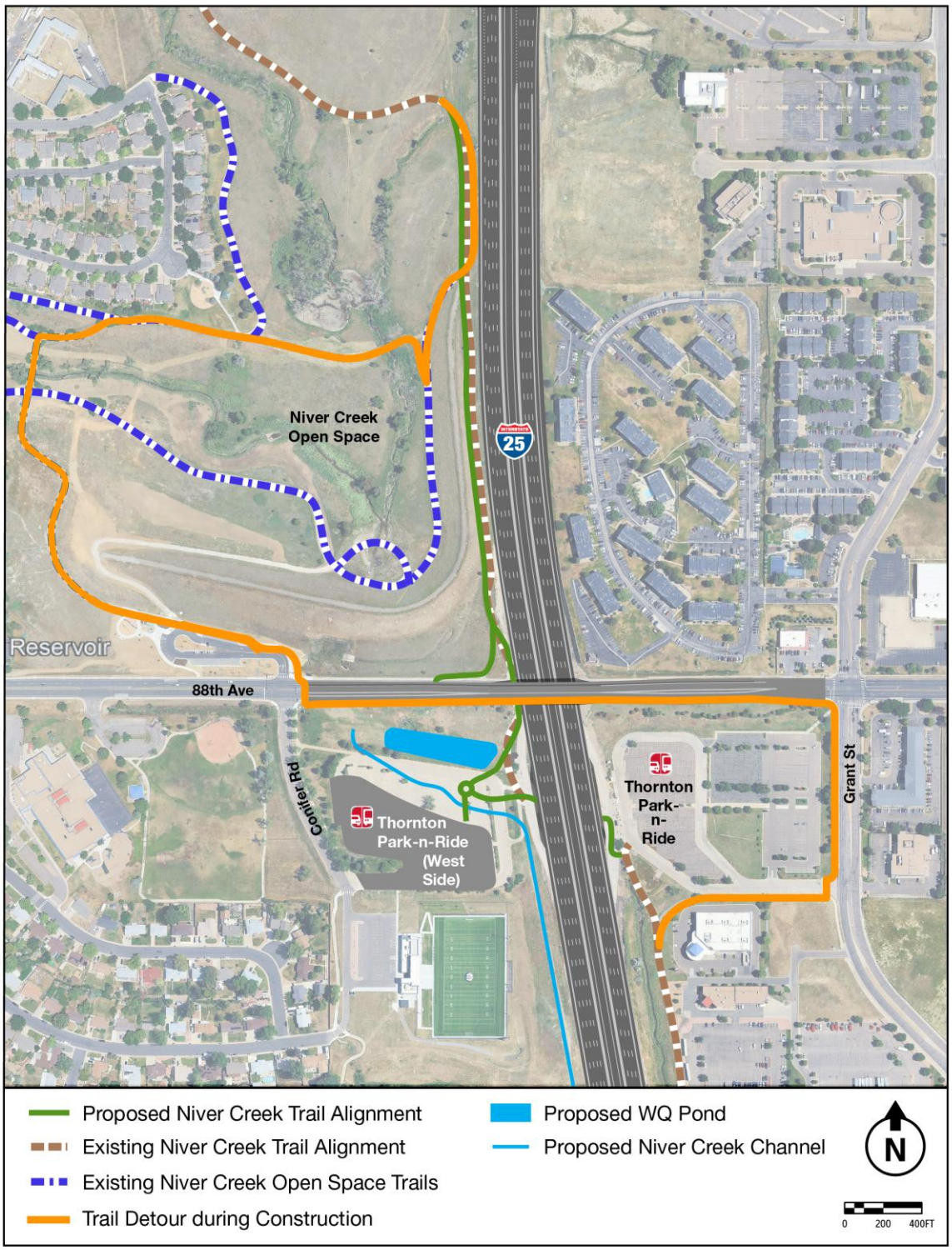
A detour of the Niver Creek Trail, illustrated on **Figure 4** below, would take place temporarily during construction. This detour includes a short temporary trail to be constructed along the realignment area of the Niver Creek Trail. Trail users going south on the Niver Creek Trail would then be re-routed 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 feet of the existing Niver Creek Open Space Trails at the north end of the realignment. 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. 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. 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).

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



6.0 Mitigation

Table 2 documents the mitigation commitments for recreation and Section 6(f) resources associated with the Proposed Action.

Table 2. Mitigation Commitments

Activity Causing Impact	Location of Activity	Impact	Mitigation Commitment	Responsible Branch	Timing/Phase of Mitigation Implementation
ROW acquisition	Property from the west end of Civic Center Park	The Proposed Action includes acquiring property from the west end of Civic Center Park for ROW use; however, this portion of the property is outside the fence determined to mark the area of the park that is available for recreational use.	An intergovernmental agreement (IGA) would be required between CDOT and the City of Thornton for the project. The City of Thornton would be compensated for the property acquired in accordance with the IGA.	CDOT Design	Design
ROW acquisition	Niver Creek Open Space	The Proposed Action includes acquiring permanent ROW and a City of Thornton Construction Permit from the east edge of the Niver Creek Open Space.	An IGA would be required between CDOT and the City of Thornton for the project. The City of Thornton would be compensated for the property acquired in accordance with the IGA.	CDOT Design	Design
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 would be posted prior to project construction to inform Niver Creek Trail users of the detour information. During construction, the detour would be clearly marked.	CDOT Design CDOT Construction	Design Construction
Construction activities	Niver Creek Open Space	The Proposed Action requires ground disturbance in the open space area, including vegetation removal.	Any temporarily disturbed areas would be revegetated post-construction according to Thornton Parks and Open Space specifications.	CDOT Construction	Construction Post-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 feet) 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
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
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

There are no permits required for Recreational resources and no consultation anticipated for Section 6(f).

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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.

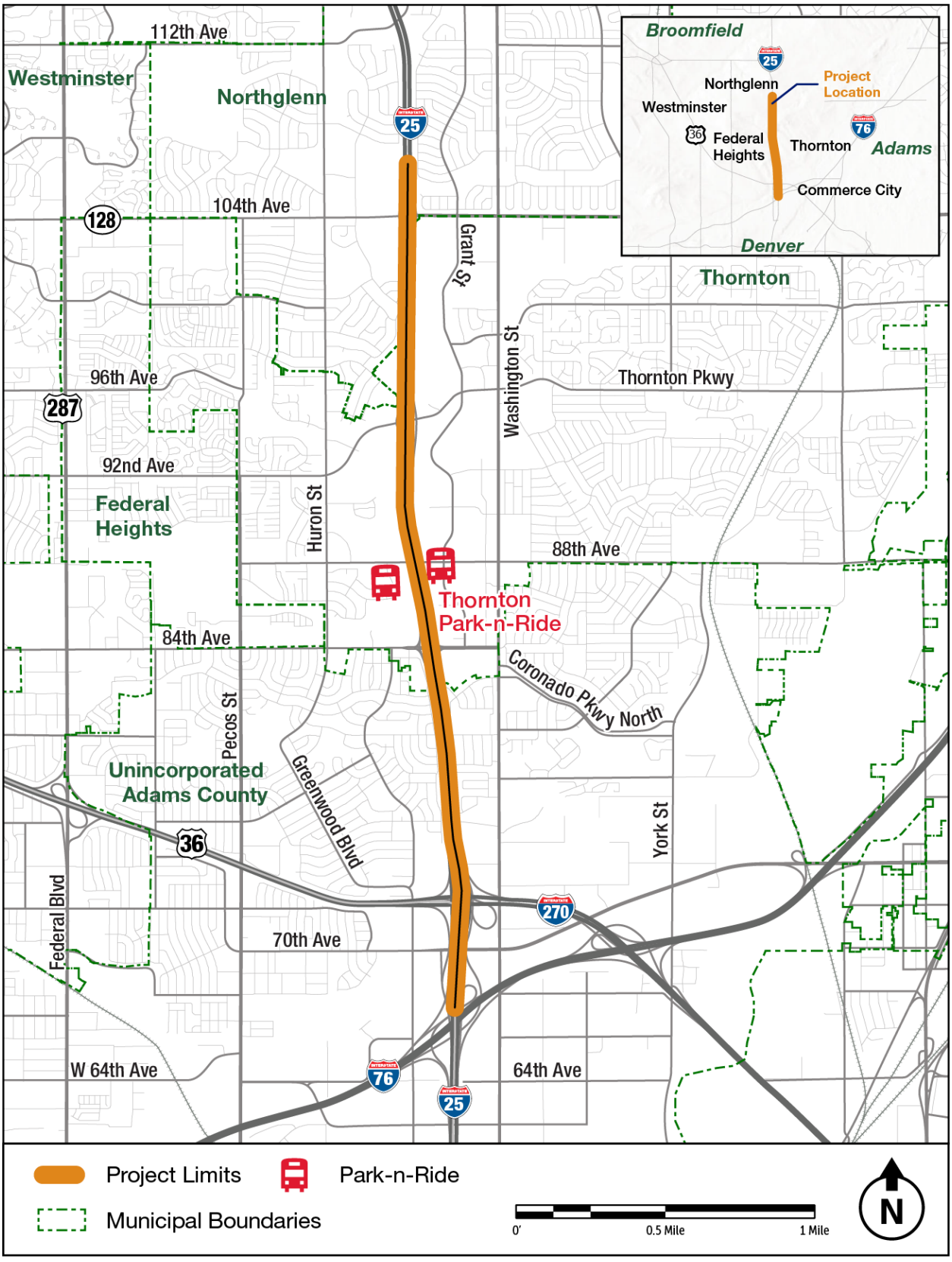
Study Area

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

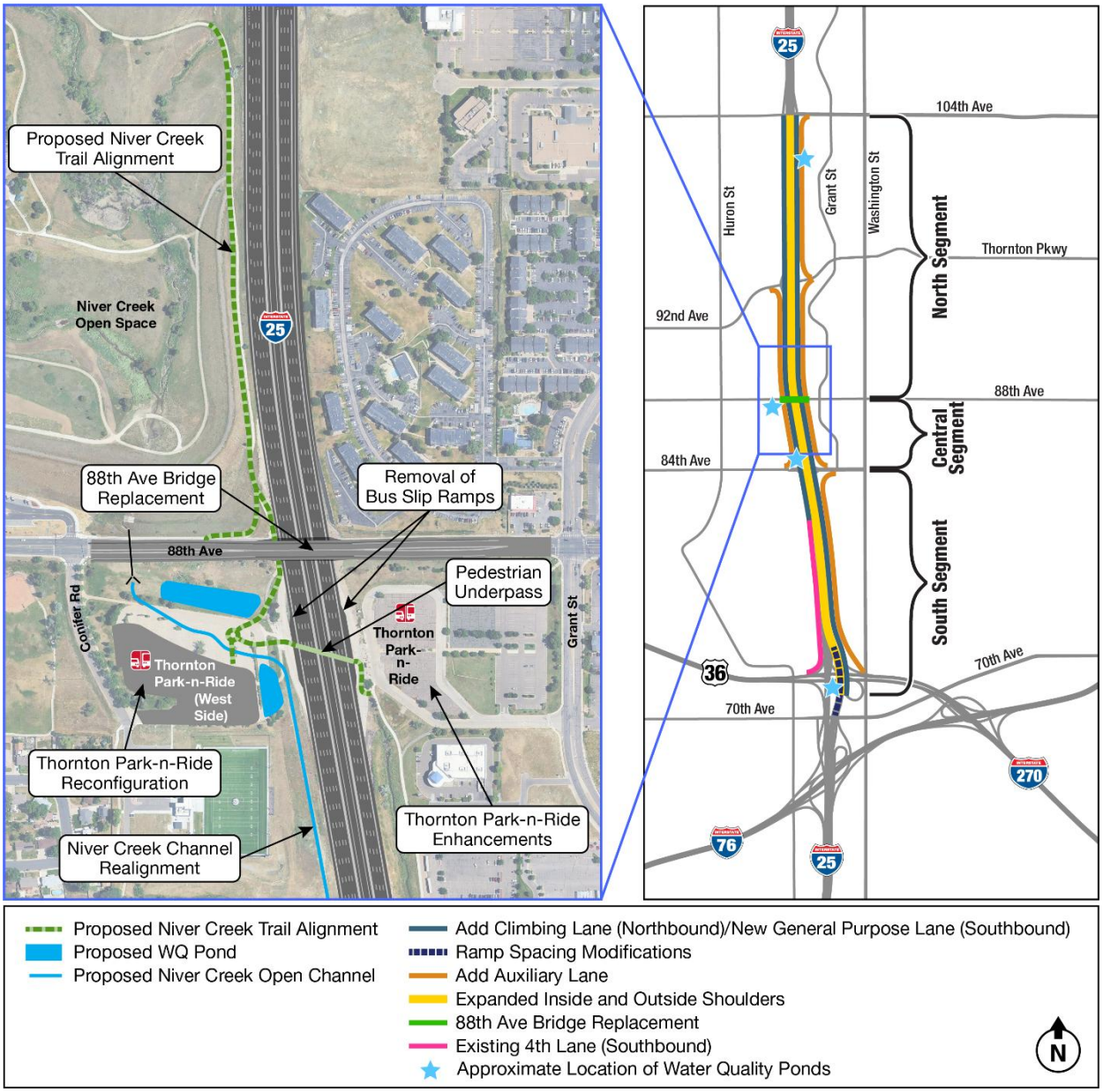


Figure 3. Proposed Improvements to I-270 Exit to NB I-25

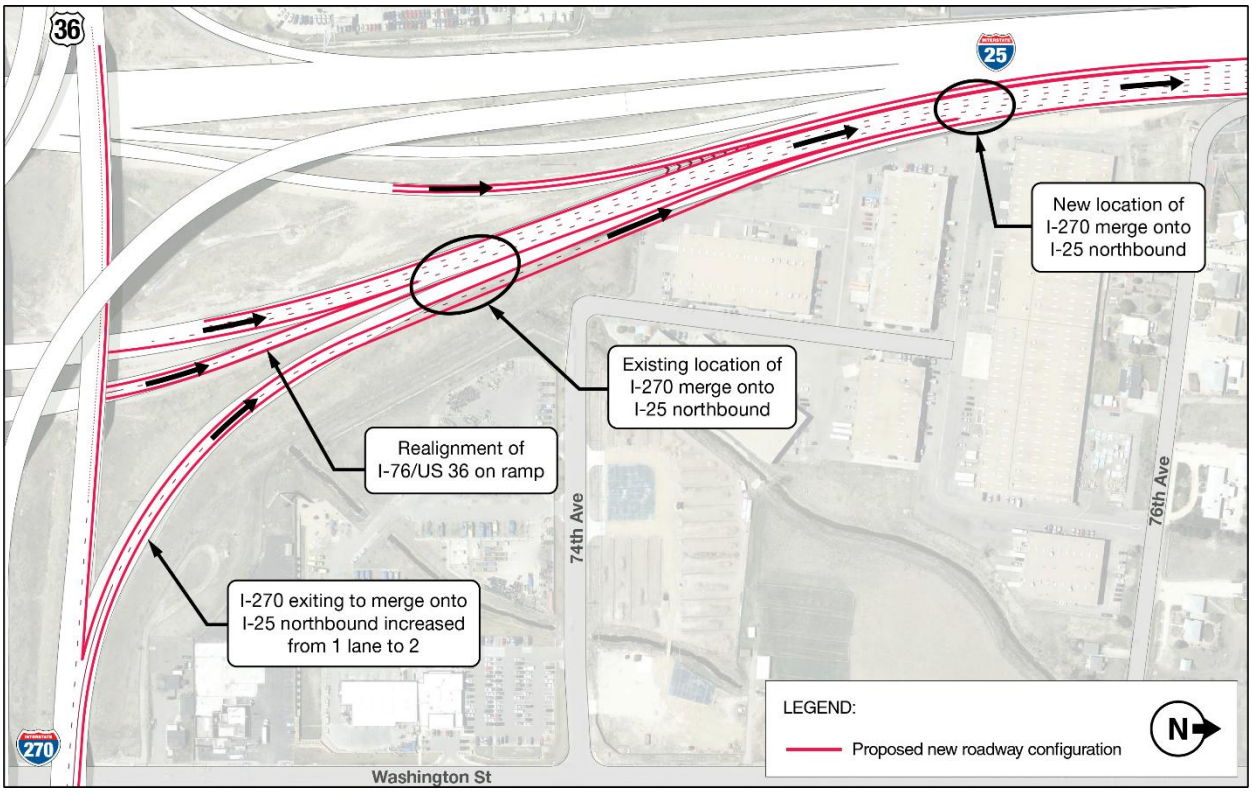
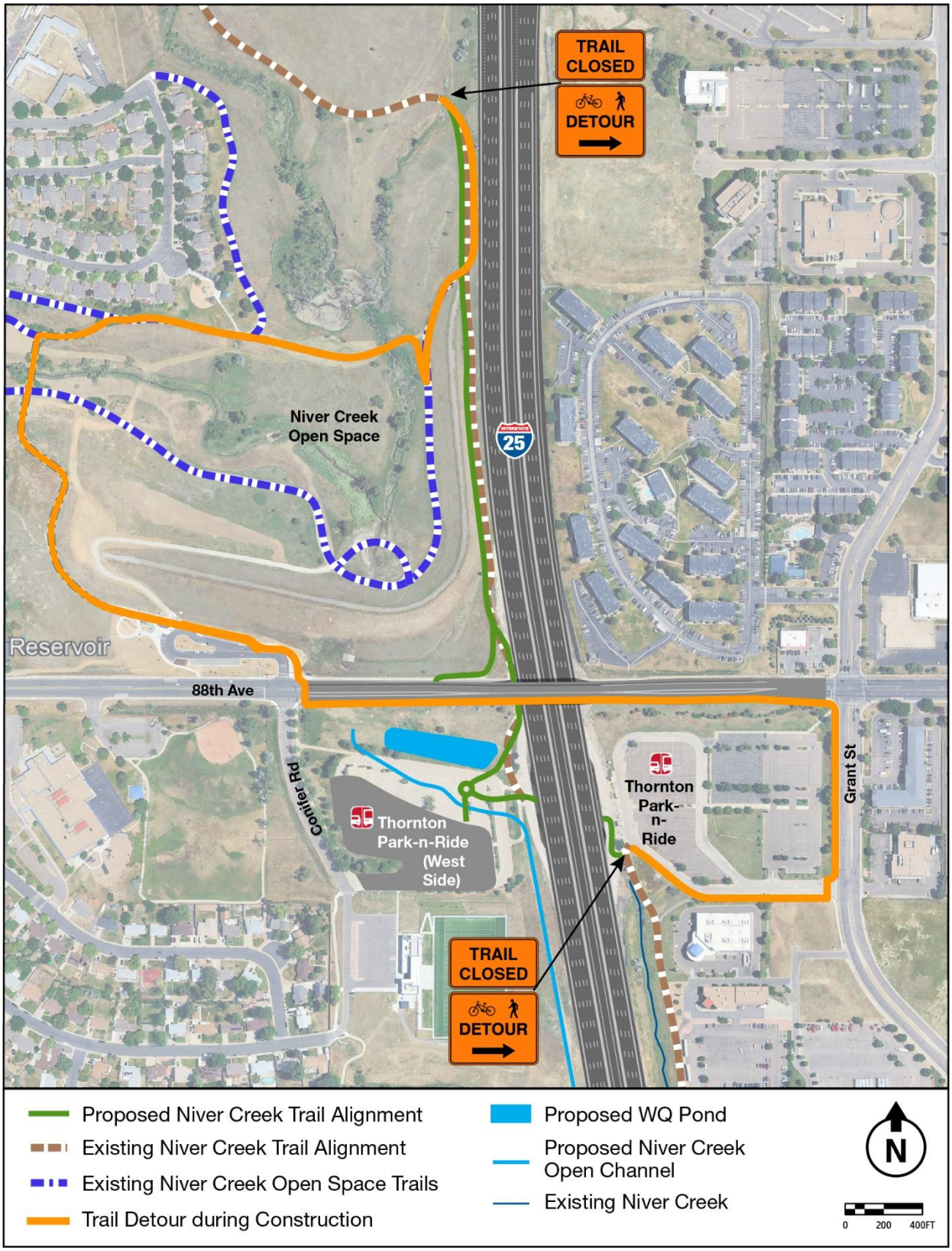


Figure 4. Proposed Realignment of Niver Creek Trail



Attachment B.

Proposed ROW

Attachment B. Proposed ROW

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NOTE: This attachment is not able to be included in the Environmental Assessment at this time due to accessibility. If you would like a copy of this attachment or to sit down with a project team member to review this attachment, please contact the project team at I25.US36to104thAvenue@gmail.com or 720-378-8859.