Attachment A.

Agency Stakeholder Meetings

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Meeting Notes

Project:	I-25 (025A) US 36 to 104th Avenue (M.P. 216.520 to M.P. 221.450)
Meeting:	Agency Stakeholder Scoping Meeting
Date:	Tuesday, February 20, 2024, 1:00PM - 3:00PM
Location:	Virtual (Google Meets)

Introductions:

Project Information: Casey/Anthony

- Project Name: I-25 (025A) US 36 to 104th Avenue Safety & Operations Improvements (M.P. 216.520 to M.P. 221.450)
- Project Number: PM 0253-299
- Budget (10-year Strategic Funds)
  - Design: $20M
  - Construction: $90M (FY 27)
  - Est $300M Program
- Schedule – This is the anticipated schedule. Actual schedule is under development.
  - NEPA - 16 Months
  - Decision Documentation - 3 Months
  - Design and Right-of-Way - 18 to 24 Months
  - Construction (Design Services During Construction) - 2 Years
- Contact List – Atkins will prepare an agency stakeholder contacts list.

Previous Studies Overview: Casey reviewed previous studies.

- 2011 – North I-25 Final Environmental Impact Statement (FEIS)
- 2014 - North I-25, US 36 to SH 7 Planning and Environmental Linkages (PEL)
- 2017 - I-25 North Metro Managed Lanes Road Safety Audit (RSA) and Updates
- 2020 - Non-published I-25 (US 36 to 104th) Environmental Assessment (EA), Technical Reports and FIR Plans (21180)
- 2021 - White Paper #1 North I-25 (US 36 to 104th Ave) Supplemental Options Analysis (21180)
- 2022 - I-25/I-270/US 36 Express Lanes Direct Connects Interchange Development Plan (23615)
- 2023 - White Paper #2 Safety & Transit Impacts Analysis White Paper (24962)

Project Overview: Anthony

- Safety and Operational Improvements
- New NB CD Road from I-270 to 84th Ave and Shift 84th NB exit ramp to the south
- Re-align NB Ramps from I-76 and US 36
- Accommodate direct connect ramps
- NB climbing lane to 104th Avenue
- Auxiliary Lanes
- Center Loading Platform and RTD Parking Area modifications
- 88th Ave Bridge Replacement
- Trail relocation
- Niver Creek Floodplain
- SB I-25 right hand exit ramp to EB I-270
- Maintenance facility and plowing

Trucks use 84th Ave
Oversize and Hazmat use this route.

General comments on the project scope

Thornton is studying 88th Ave to determine the traffic and bike and ped needs. This will set the roadway width needed to replace the bridge.

There are currently lights along the Niver Creek trail and under the 88th Ave Bridge that should be replaced if impacted.

The physical map revision for Niver Creek and Tributary L is being re-modeled using new Criteria. (FHAD) Flood Hazard Area delineation is the current State regulatory model. Will likely submit to FEMA fall 2024 or winter 2025.

The existing pedestrian underpass at the park and ride is part of original Niver Creek Bridge built before Niver Dam. Request to maintain conveyance of 100-year flood in the underpass, even if pedestrian access is moved to an overpass.

Location of the slip ramp for NB 84th Ave exit should accommodate trucks. There are currently safety issues with traffic from the NB reversable lane exiting at 84th Ave and weaving across 3 lanes of traffic. There could be opposition from locals if we prohibit access to 84th Ave from the reversible lane.

Consider drainage at CLP

Increased EMS traffic NB on I-25. They use Thornton or 84th Ave to access the hospital, and congestion is increasing response times. Request to discuss emergency-only access to hospital from off ramp.

Consider shelters on the platform if there are wait times – Covered station.

NEPA: Austin/Colleen

- Transition from prior studies to current effort. Update with new information. Mainly addressing changes since draft EA was prepared.
- Bicycles/Pedestrians
    - Trail connections and ped/bike facility on rebuilt 88th Ave bridge. Consider access to west and north to new station as it moved forward.
- Land Use & Socioeconomics
    - Prior study impacts: limited to open space conversion to transportation use
    - Will conduct new impact analysis with updated data collection. Will use 2021 data to match EPA screening tool.
- ROW
    - Prior study impacts: no relocations, acquisition of 20 ac from 32 properties
    - Will conduct new impact analysis
- Hazardous Materials/Solid Waste
    - Prior study impacts: potential effect from 25 facilities – historical landfills, chemical spills, former gas stations, commercial businesses
    - Will prepare new MESA with new ERIS database search
- Floodplains and Stormwater/ Water Quality
    - Project intersects Niver Creek and South Grange Hall floodplains
    - Prior study impacts: included floodplain encroachments and anticipated CLOMR
    - Will conduct new modeling to inform CLOMR process

- Wetlands and Other Waters of the US
  - Prior study impacts: 0.4 ac wetland impacts
  - Will perform new wetland delineation and Corps consultation
- Biological Resources
  - Prior study impacts: habitat and riparian area loss, weed spread, wildlife disruption
  - Will field verify prior surveys and run new database searches
- Historic Resources
  - Prior study impacts: no adverse effect to historic resources (4 NRHP eligible identified)
  - Will confirm Area of Potential Effects, prepare revisit forms for eligible properties, evaluate properties built before 1980
- Noise
  - Prior study impacts: 118 affected receptors, relocation of existing noise wall
  - Will conduct new noise analysis for 2050 No Action and 2050 Proposed Action
  - Request from neighbors for a noise wall on the west side of I-25 between 84th And Thornton Parkway
- Environmental Justice
  - Study area includes minority, low-income, and disproportionately impacted communities
  - Will conduct new analysis with updated data to comply with current state/federal regs
- Air Quality and Greenhouse Gases
  - Will conduct Project-level emissions analysis for criteria pollutants, MSATs, GHGs
  - Will estimate GHG emissions – opening year to 2050, construction/maintenance, upstream fuel cycle
  - Will calculate social cost of carbon

Public and Stakeholder Outreach: Tamara and Crystal

- Public outreach goals and tactics
  - All outreach will comply with SB 21-260
- Public outreach approach
  - Website
  - Social media posts
  - Bus and walking tours
  - Local government outreach and meetings
  - Public meeting
  - Informational materials
- Anticipate attending NATA meeting on March 28th

  Give notification for council to attend Public Meetings. Tuesdays have limited availability. Consider multilingual services.

Agency Feedback: Casey

- City of Thornton – South Grange Hall Creek is just south of the creek. Crossings are old and date to the US 87 days (pre- I-25). Would like to be involved in parks, trails, drainage/wetlands, AQ, and traffic. Wetlands are poorly maintained drainage channels. City has put in rail light along Niver Creek Trail. Consider access and trail system connections to new station.
- City of Northglenn – Was not able to attend.
- City of Federal Heights – Interested in overflow traffic curing construction.
- City of Westminster – Want to improve transit experience for residents.

- Adams County - Was not able to attend.
- CTIO – overall schedule and budget.
- RTD – interested in maintaining their service as expected. Re-delineating the wetlands is a great idea.
- Smart Commute – Interested in transit, multi-modal, and communications.
- FTA – Protection of riders and ridership. Safety of users.
- CMCA – Concerns are safety, clearance, re-routing, and detours. Only route available to deliver fuel and medical supplies. Do we have truck counts at 84th Ave. Maintain connections f rom other highways. I-270 is a hazmat detour route. I-25 accommodates oversized loads.
- DRCOG – Part of regional transportation plans for 2050. Provide updates to the board and committees for stakeholder coordination during NEPA
- Mile High Flood Control District - Drainage way management for channel maintenance and change in designs.
- USACE – Interested in Wetlands and tributary impacts. Wetland delineation should include Ordinary High Water Mark of tributaries during the growth season.
- CDPHE – Helping out with Air Quality when possible.
- EPA - Was not able to attend.
- State Patrol - Was not able to attend.
- Plenary Roads – No additional comments.
- CPW - Was not able to attend.
- USFW - Was not able to attend.
- SHPO - Was not able to attend.
- North Suburban Medical Center – Traffic Flow and community support.
- Mapleton Public School District - Was not able to attend.
- Others

CDOT Project Meeting Schedule: Casey

- Meeting schedule/Cadence
  - TWG's Monthly – Fourth Thursday 9:00-11:00A
  - Stakeholders quarterly or as needed.
  - Agency level of involvement and discipline interest
- Contact Andy Stewart for latest models.

Next Steps and Action Items:

Summary of Decisions Made:

1.
2.

COLORADO
Department of Transportation

February 20, 2024

AGENCY REP
AGENCY
EMAIL

Subject: Invitation to Agency Stakeholder Scoping Meeting for I-25 (US36 to 104th Ave) Safety and Operations NEPA and Design Project

Dear AGENCY REP:

The Federal Highway Administration, as lead federal agency, and the Colorado Department of Transportation (CDOT), as the project sponsoring agency, are initiating the National Environmental Policy Act (NEPA) process for proposed improvements to I-25 from the US36/I-270 Interchange to 104th Avenue Interchange. Your agency is invited to attend an agency scoping meeting to provide feedback on area conditions and regulatory concerns. The purpose of the I-25 (US36 to 104th Avenue) Safety and Operations project is to improve safety, operations and multimodal connectivity. The proposed improvements that will be further studied include: a safety widening to accommodate standard width shoulders, standard express lane buffer width, a center median transit station at the existing Thornton Park n Ride, an additional general-purpose lane, auxiliary lanes, a collector-distributor road, 88th Avenue Bridge Replacement and ramp modifications.

The components included in the Proposed Project are the results from multiple alternatives screening considering alternatives developed during the North I-25 Final Environmental Impact Statement (FEIS) completed in 2011, North I-25 Planning and Environmental Linkages (PEL) Study completed in 2014, Road Safety Audits (RSA) performed from 2017-2019, unpublished Environmental Assessment (EA) in 2020, White Paper #1 North I-25 (US36 to 104th Ave) Validation and Supplemental Options Analysis, and White Paper #2 Safety and Transit Impact Analysis, as well as extensive public and stakeholder engagement.

CDOT is leading this project and has retained AtkinsRéalis to prepare a NEPA document and design plans for the Proposed Project. We have previously consulted with some resource agencies as part of the project, but this meeting serves as the official agency scoping meeting. The purpose of the meeting is to introduce or re-introduce your agency to the project, review the initial project schedule, review the project's purpose and need, project goals and obtain agency comments on any important environmental or regulatory issues. This agency scoping videoconference is scheduled for **Tuesday February 20, 2024** from **1:00 –3:00 p.m.**

Your agency's involvement is valuable as we proceed through the environmental process. You will receive a google meeting invitation from myself. Please respond by accepting or declining the meeting invitation. Please send a representative if you are unable to attend and/or forward this invitation to the appropriate individual if you feel you are not the correct recipient. I look forward to your participation and thank you for your cooperation.

Sincerely,

Casey Martinez, PE
Project Manager for CDOT's I-25 (US36 to 104th Ave) Safety and Operations Project

Cc: Chris Horn (FHWA), Austin Curry, Thomas Magenis (CDOT), Anthony Pisano (AtkinsRealis)

Attachment A. (Agency Stakeholder Meeting 2) Agency Stakeholders Meeting Update Region 1, I-25 Safety & Operations Improvements (US-36 to 104th Ave) June 27, 2024

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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.

Meeting Minutes

Project:	I-25 (US36 to 104th Avenue) Safety and Operations (M.P. 216.520 to M.P. 221.450)
Meeting:	Agency Stakeholder Meeting Update
Date:	Thursday, June 27, 2024, 2:00PM - 3:30PM
Location:	Virtual (Google Meets)

Attendees:
CDOT - Casey Martinez, Bailey Moran, Caroline Johnson, Erika Galyardt, Jessica Myklebust, Tamara Rollison, Tom Magenis, Austin Curry, Crystal Armendariz, John Gregory, Thanh Ly, Piper Darlington, Ivonne Colin
CPW - Lexi Hamous-Miller
CDPHE - Dale Wells, Kevin Briggs, Kira Shonkwiler
Atkins - Anthony Pisano
RTD - Susan Johnson, Susan Wood, Kelsie Ryan, Paul von Fay, Aislinn Drosk
CIG: Anya Lofgreen
FHWA: Chris Horn, Stephanie Gibson, Will Keenan
Federal Heights: Jeff Hill
Thornton: Jim Kaiser, Dan Schiltz, Kent Moorman
DRCOG: Jacob Riger, Steve Cook
FWS: Kristin Salamack
CMCA: Tracy Sakaguchi
EPA: Julie Smith, C. Razzazian
Westminster: Heath Klein
Adams County: Michele Riccio
Plenary: Christian Guevara
Smart Commute: Tammy Herreid

Total: 41

Meeting Agenda

- Project Overview
- Project Team
- Draft Purpose and Needs
- Environmental Resource Focus Areas and Update
- Environmental Justice
- Traffic and Roadway Update
- Public Outreach
- Operational and Safety Challenges
- Potential Project Improvements
- Express Lane Safety Enforcement Update
- Schedule and Next Steps

Topic	Discussed Items
Intro and Agenda	See Attendees and Meeting Agenda above
Draft Purpose and Needs	Items to Improve ● Safety ○ Crash rates obtained through RSA and white paper research ● Traffic Operations ● Transit Operations ● Pedestrian and Bicycle facilities ○ Crossings at 88th and Niver Creek don't support safe bicycle movement Comments - None
Environmental Resources Focuses	● Enhanced Evaluation and Focus Areas ○ Air Quality & Greenhouse Gases ○ Floodplain ○ ROW ○ Environmental Justice and Equity ○ Historic ● Environmental Resources also being studied ○ Utilities & railroads, Bicycle & pedestrian facilities, Visual/aesthetics, Cultural resources, Land use, Geologic Resources & soil, Noise, Hazardous/solid wastes, Recreation facilities & trails, Paleontology, Farmlands, Stormwater/water quality, Threatened & endangered species, Section 4(f)/Section 6(f), Vegetation & noxious weeds, Socioeconomics, Wetlands & waters, Transportation, Wildlife & fisheries Comments ● Kent Moorman - check noise - they have requests for sound walls, especially on the west side. Update study, numbers haven't been updated for 4-5 years ○ Austin - we are planning to do this analysis. ● Chris Horn - do more analysis than just those highlighted on slide. ○ Austin - we are refreshing research for all items.
Environmental Updates	● Wetlands ○ Field Survey within project location ● Historical Resource ○ Defining areas of impact ● Environmental Justice

	○ Currently defined EJ area and mitigation measures to limit impact ○ EJ Memo has been submitted to FHWA ● Air Quality and Greenhouse Gases ○ AQ and GHG methodology memos will be submitted to FHWA soon ○ This is a RS/TC identified in 10-year plan that requires air monitoring for particulate matter during construction per SB 21-260 and CRS. Comments ● Jacob Riger - also regionally significant for DRCOG. Part of 2050 plan. Keep them in the loop of any project changes. GHG compliance falls in the DRCOG area, and is MPO/federal thing also, not just state.
Environmental Justice	● Environmental Justice communities characteristics ○ Large communities of Color ○ Lower Income ○ High housing cost burdens ○ High risk of health and environmental impacts ● The Environmental Justice Analysis ○ Evaluate how project affects area of impact ○ Investigation into Mitigation measures ○ Conduct outreach for meaningful community participation. Comments ● Kent Moorman - Area of EJ could apply to concerns about noise ○ Clarify local streets Huron vs. Pecos Street. Westside study boundary is Huron Street and eastside study boundary is Washington Street.
Air Quality and Preconstruction Monitoring	● Transportation Air Quality Requirements ○ Minimum 4 weeks pre construction monitoring to establish baseline ○ Issue public alerts should particulate matter exceeds established limits ○ Briefly looked at Floyd Hill AQ webpage as project example (https://www.codot.gov/projects/i70floydhill/airquality) Comments ● Michele Riccio - do you look at asthma rates to assess impacts? ○ Austin will follow up with region AQ specialist
Traffic and Roadway Update	● Actions Taken ○ Completed traffic methodology memo and traffic data

	collection ○ Updating Cluster Analysis and Traffic Demand Model (TDM) to generate 2050 volumes, and anticipate draft TDM report to CDOT and FHWA in mid-July ○ Working on IAR (Interstate Access Request) methodology memo, which will guide our microsimulation modeling so it meets FHWA requirements when complete ○ Began working on calibrating microsimulation model for existing conditions, and will begin working on future no-build and proposed action when draft TDM is complete in mid-July ○ Anticipate completing microsimulation modeling in the fall ○ Developing preliminary roadway linework for southern and central segments ○ Met with Regional Transportation District (RTD) and CDOT Division of Transit and Rail (DTR) to go over our median station alternatives and their input has been added into our pro/con evaluation matrix ○ Refining median station alternative options and seeking stakeholder input Comments - none
Public Outreach	● Purpose ○ Engage with public for information and listen to alternative perspectives and opinions on the project ○ Provide opportunities for the public to engage and provide input as we progress. ● Strategy/Tactics ○ Outreach to comply with SB 21-260 ● Planning and Materials ○ Digital marketing and websites ○ Physical flyers and fact sheets ○ Newsletters and published articles ○ Local Agency PI teams ● Meetings ○ NATA Presentation ○ Thornton Fest ○ Local Agency Stakeholder Updates ○ Open House Comments ● Kent Moorman - suggest reaching out to Northglenn Sentinel and the communications group at City of Thornton/Northglenn
Open House	● July 24th from 5:30-7:30pm at Northglenn Recreation Center

	• Topics Covered
	  ○ Project background
	  ○ Purpose and Need
	  ○ Existing conditions
	  ■ Safety issues
	  ■ Operational issues
	  ■ Previous RSAs (crash types, location etc)
	  ○ Environmental Resources
	  ○ Potential Project Improvements to address the existing conditions
	  ○ Public input
	  ■ Comment forms, surveys, QR code and project website
	
	Comments - none

Operational and Safety	• Limited shoulder width for emergency use • Limited buffer between the express lane and general-purpose traffic • Steep grades along NB I-25 are challenging for freight and other large vehicles to accelerate and merge into traffic • Weaving and lane changes from NB I-25 traffic from the reversible lane to use 84th Avenue exit ramp • Traffic merging onto NB I-25 from I-270, US 36, and I-76 • Thornton Park n Ride access challenges for buses and pedestrians • Discontinuity in east-west trail system across I-25 near 88th Avenue Comments - None

Potential Project Improvements	• Elements under consideration
	  ○ Widen shoulders and Express Lane buffer
	  ○ Construct a barrier separated Collector-Distributor (C/D) road system from westbound I-270 to 84th
	  ○ Build a new Thornton Park-n-Ride median transit station in the center of I-25
	  ○ Replace the 88th Avenue bridge to accommodate the widening
	  ○ Provide separate pedestrian access connecting the new mobility hub to adjacent RTD parking facilities
	  ○ Realign the Niver Creek Trails to connect Thornton Park-n-Ride mobility hub, 88th Avenue Bridge and RTD parking facilities
	  ○ Add auxiliary lanes in both directions between 84th Avenue and 104th Avenue interchanges
	  ○ Provide a northbound climbing lane from 84th to 104th avenues to assist heavy trucks to ascend the steep grades

	Comments - None
South Segment	• Alternatives ○ Existing CDOT Maintenance Yard ○ 84th Off Ramp moved south ○ C/D Road ■ 2 lane ■ I-270 to 84th ■ Barrier separated ○ Safety widening (shoulders and express lane buffer) Comments • Kent Moorman - how to get people from express lane to 84th (NB). Remember this is serving the EJ area. There are already SB concerns. ○ Casey - still doing traffic modeling to assess impacts and actual effectiveness of this. ○ Tom - EA showed great benefit from reduced weaving movements. Also will look at origin-destination data on reversible sections to further assess effectiveness of CD road. Need to put through traffic model.
Central Segment	• Alternatives ○ NB climbing lane ○ Auxiliary Lanes both directions between 84th and 104th Ave ○ Median transit station ○ RTD Parking Lot reconstruction ○ Trail realignment ○ 88th Ave Bridge replacement ○ Pedestrian over/underpass ○ Safety widening (shoulders and express lane buffer) Comments • Kelsie Ryan - slide 20 - asks if crossover design is the selected one. RTD doesn't prefer crossover design (option 1). ○ Casey will present all median transit station alternatives later in the presentation. Just didn't have time to get renderings for all options yet. We are also looking at ped overpass and underpass options. ○ Tom - crossover design has been used in the US. We are looking into safety performance data on this. • Kelsie Ryan- options 2 and 3 are much more similar to other CO stations (colfax). Preferred for consistency.
North Segment	• Alternatives ○ Safety widening NB only (shoulders and express lane buffer)

	○ Climbing lane Comments ● Kent Moorman- 4' buffer on US-36 express lanes also? ○ Casey - yes ○ John Gregory - 4 foot buffer is the standard buffer width across all the express lanes along the front range
SB I-25 Exit to EB I-270	● Existing Left Hand Exit (A-typical) ● Alternative Right Hand Exit (typical) ○ Assessing from a geometric, traffic and safety aspect to look at the benefits and feasibility, but not clearing environmentally. Comments - none
Center Platform Mobility Hub	● Option 1: Aligned Center Platform ○ overpass/underpass ● Option 2: Offset Platform ○ overpass/underpass ● Option 3: Aligned Outside Platforms ○ overpass/underpass Comments ● Jessica Myklebust - Option 1 - CDOT is generally not a big proponent of elevators ○ Casey - DTR also has a strict no elevator policy. ○ Tom - we are documenting this in a pro/con matrix and design decision document. Just want to memorialize that we looked at it, but the elevator option will be eliminated. ● Kent Moorman - Option 2 - what were north stations designed like? ○ Casey - our Option 3 is identical to Centerra. ● Tracy S- clearance for the overpasses? Vehicle ○ Caroline and Tom: 17 ½' ● Kelsie Ryan - option 2 is most similar to Colfax which is why it's their preferred option. Option 1 not preferred because RTD would like to reduce conflict points if cars get into the median station (prefer no cross-over).
Express Lane Safety Enforcement	● Program is in place ○ Keep traffic flowing ○ Efficiency ● Safety goal - Zero Death Initiative ○ Eliminate all traffic fatalities ● Types of Violations ○ Entering/exiting Express Lane ■ Speed differentials

	○ Unauthorized vehicle on I-70 Mountain Express Lane ■ 11ft wide ○ I-70 usage outside of operating hours ■ Use as emergency stops ● Express Lane Enforcement ○ Began Labor Day Weekend 2023 ○ $75 fee ○ $150 fee if not paid in 20 days ○ 174,000 violations ● Early Stats ○ Positive change ○ 75% reduction in violations since start ○ 81.4% not repeated ● Common Feedback ○ Ingress needed between 120th and 136th ○ Ingress between 84th and Thornton Pkwy too short ● Total Numbers ○ Total number of violations I-25 Seg. 2 ■ NB = 85,814 ■ SB = 76,552 ■ Total = 162,366 ○ Total number violations I-25 Seg 2&3 ■ 245,656 ■ C470= 219,883 Comments ● Ivonne Colin - keep in mind that they sent out a bilingual press release on express lane safety yesterday (06/26). This is top of mind and the entire communications team is trying to get the message out for the entire state. ○ Link found here: https://www.codot.gov/news/2024/june/keep-it-cool-in-the-express-lanes-this-summer
Study Schedule	● 2021-2023 ○ Initial Screening with previous White Papers ● Early to mid 2024 ○ Draft Purpose & Need ○ Survey & Traffic Data Collection ○ 1st open house meeting ● Mid to late 2024 ○ Purpose & Need Refinement ○ Alternative Refinement & Screening ○ Traffic Modeling ○ 2nd Open House Meeting ● Early to mid 2025 ○ NEPA Environmental Analysis & Documentation

	Comments ● Tracy Sakaguchi - do you have a draft P&N? ○ Chris Horn - no. FHWA does not agree with the current one so further conversations are needed. ○ Austin Curry - draft is in progress. Will distribute for review when available after FHWA's review, but prior to the next agency update meeting.
Next Steps	● Items in process now ○ TWG meetings ○ Roadway design alternative refinement ○ Traffic modeling & data collection ○ NEPA research & investigations ○ Public meeting prep ● Upcoming Meeting and Outreach ○ EOC meeting: July 8th, 2024 ○ 1st open house: July 24, 2024 ● Additional Agency Coordination Topics ○ 88th Ave Complete Streets Study Progress ■ Kent Moorman- planning to finish up this year. Having a meeting next month on the cross sections to refine them. ○ Other Comments ● Kent Moorman - will need to bring the Parks group in the loop later, for the Niver Creek trail. Some of the land on the NW corner of 88th could be 4f.

Attachment B.

Resource Agency Coordination

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History Colorado

March 24, 2025

Lisa Streisfeld
Region 1 Environmental Manager
Colorado Department of Transportation
Region 1
2829 W. Howard Pl.
Denver, CO 80204
jamie.shapiro@state.co.us

RE: Determination of Eligibility and Effect, I-25 from U.S. Highway 36 to 104th Avenue Safety and Operations Improvements, SA 25563, Adams County (HC #85913)

Dear Ms. Streisfeld

Thank you for your recent correspondence dated March 14, 2025, received by our office March 14, 2025, requesting review of the above referenced undertaking under Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations 36 CFR part 800. Our office has reviewed the submitted materials, and we offer the following comment.

Identification of Historic Properties
We concur with CDOT's definition of the Area of Potential Effect (APE) for this undertaking. CDOT evaluated 51 resources within the APE. We concur with CDOT's determinations of eligibility for these properties.

One site (AMF Sonesta Lanes, 5AM.4353) was identified by CDOT as "officially needs data" as it may be eligible for National Register listing under Criterion A. We concur with this determination, and believe the resource should be treated as eligible for the NRHP for the purposes of this undertaking.

Assessment of Effects
We concur with your finding that the undertaking as described will result in no adverse effect, 36.CFR.800.5(b) on the eight resources identified by CDOT within the APE which are eligible for listing on the National Register, or which are supportive of National Register eligibility. The undertaking will also have no adverse effect on the aforementioned 5AM.4353, which our office is treating as eligible for the purposes of this undertaking.

Section 4(f) Evaluation
The undertaking will result in no adverse effect to historic properties. Accordingly, we concur that a *de minimis* finding is appropriate for this project.

Should unidentified historic properties or unanticipated effects to historic properties be discovered in the course of the undertaking, work must be interrupted in order to complete consultation with our office and other consulting parties pursuant to 36.CFR.800.13. Also, should the consulted-upon scope of the work change please contact our office for continued consultation under Section 106 of the National Historic Preservation Act.

We request being involved in the consultation process with the local government, which as stipulated in 36 CFR 800.3 is required to be notified of the undertaking, and with other consulting parties. Additional information provided by the local government or other consulting parties might cause our office to re-evaluate our eligibility and potential effect findings. Please note that our compliance letter does not end the 30-day review period provided to other consulting parties.

Thank you for providing the opportunity to comment. If you have any questions, please feel free to contact Joseph Saldibar, Architectural Services Manager at (303) 842-5619 or by email at joseph.saldibar@state.co.us.

Sincerely,

Dr. Holly Kathryn Norton

Digitally signed by Dr. Holly Kathryn Norton
Date: 2025.03.27 10:06:46 -06'00'

(for) Dawn DiPrince
State Historic Preservation Officer

STATE OF COLORADO

Curry - CDOT, Austin <austin.curry@state.co.us>

Archaeological Clearance - I-25 Safety Improvements between US 36 to 104th Avenue SA 25563 Project PM 0253-299

1 message

Wolff - CDOT, Greg <greg.wolff@state.co.us> Mon, Mar 9, 2026 at 12:48 PM
To: "Curry - CDOT, Austin" <austin.curry@state.co.us>

Austin-

I have reviewed the consultant's limited results inventory report which documents the negative results of their archaeological survey conducted in association with the above-mentioned project. Much of the area of potential effect is disturbed by prior construction, and the APE contains no archaeological resources based on the results of the archaeological survey conducted by the consultant.

Under the terms of CDOT's Section 106 Programmatic Agreement (PA) with the SHPO, I have submitted the consultant's report to the SHPO for their files (see attached consultation letter dated October 21, 2024). Per the terms of the PA, response comments from SHPO are neither anticipated nor are they required, and none were received. Tribal consultation was conducted in February 2026 by CDOT and FHWA regarding the project for the purposes of an Environmental Assessment under the National Environmental Policy Act (NEPA), and no tribal concerns were raised.

Consequently, clearance to proceed is recommended with no further actions. Should cultural deposits be encountered during any phase of construction, please notify me immediately so that they can be evaluated for National Register of Historic Places eligibility.

Thanks,

Greg

--
Greg Wolff
Senior Archaeologist
Archaeology Program Manager

COLORADO
Department of Transportation
Division of Transportation Development

P 303.757.9158
2829 W. Howard Place, Denver CO, 80204
greg.wolff@state.co.us | https://www.codot.gov | cotrip.org

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Negative Report SHPO Transmittal Letter 25563.pdf
210K

COLORADO
Department of Transportation

To: Bob Kees, City of Thornton Deputy Director of Parks, Recreation & Community
Kent Moorman, City of Thornton Regional Transportation Engineer
From: Veronica Reid, CDOT Region 1 Section 4(f) Specialist
CC: Austin Curry, CDOT Region 1 Environmental Project Manager
Casey Martinez, CDOT Region 1 Project Manager
Colleen Roberts, Peak Consulting Principal
Date: February 5, 2026

Subject: Right of Way Acquisition at Civic Center Park and Niver Creek Open Space as part of I-25, US 36 to 104th Avenue Project, and Section 4(f) Applicability

Dear City of Thornton Representatives,

CDOT proposes to acquire property from the edges of Civic Center Park and Niver Creek Open Space for transportation right of way (ROW) as part of CDOT's I-25, US 36 to 104th Avenue (Ave) Project (project). This memorandum is to inform the City of Thornton of the locations and need for the property acquisition, and anticipated Section 4(f) applicability determinations. The rationale would be documented in the Environmental Assessment, currently being conducted for compliance with the National Environmental Policy Act (NEPA).

Section 4(f) Background

Section 4(f) of the US Department of Transportation Act of 1966 applies to federally funded projects and requires consideration of park and recreation lands, wildlife and waterfowl refuges, and historic sites during transportation project development. Civic Center Park and Niver Creek Open Space are being considered in the Section 4(f) analysis.

To qualify as a park, recreation area, or refuge under the statute, a property must meet all the following criteria per the FHWA Environmental Review Toolkit:

- It must be publicly owned
- It must be open to the public (except in certain cases for wildlife/waterfowl refuges)
- Its major purpose must be for park, recreation, or refuge activities
- It must be significant as a park, recreation area or refuge

There are three main types of "uses" under Section 4(f), and permanent incorporation into a transportation ROW through fee simple acquisition is one type.

Right of Way Impacts at Civic Center Park and Niver Creek Open Space

Civic Center Park

The Civic Center Park property boundary extends to the west past an existing fence line (Figure 1). The portion of the park property on the west side of the fence, nearest to I-25, currently has a transportation use and 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 City of Thornton, and is open to the public for park activities.

CDOT is proposing to acquire the strip edge of the Civic Center Park property on the west side of the fence line, up to the fence (Figure 2). This acquisition would allow for widening of the roadway and water quality improvements, and for continued maintenance of the shoulder and roadside swale by CDOT. The fence and the portion of Civic Center Park on the east side where recreation activities occur will not be impacted.

The proposed ROW acquisition is not considered to be a Section 4(f) use because the land to be acquired does meet the Section 4(f) defining criteria.

Niver Creek Open Space and Niver Creek Trail

The Niver Creek Open Space is anticipated to be evaluated as a multiple-use land holding in the EA Section 4(f) analysis. Per the Policy Paper, Section 4(f) applies only to those portions of a multiple-use public property that are designated by statute or identified in an official management plan of the administering agency as being primarily for public park, recreation, or wildlife and waterfowl refuge purposes, and are determined to be significant for such purposes (FHWA, 2012). Chapter 2, page 2-5 of the City of Thornton Parks and Open Space Master Plan defines “designated open space” as “intentionally protected from development and set aside for unstructured recreation and the appreciation of natural surroundings.” The Niver Creek Trail and trails system within the open space are anticipated to be evaluated as the primary recreation facilities subject to Section 4(f) protection.

CDOT is proposing to acquire the eastern edge of the Niver Creek Open Space up to the Niver Creek Trail. This acquisition of ROW would allow for widening of the roadway, and future maintenance of facilities, including a retaining wall (Figure 3). West of the ROW acquisition parcel, a temporary easement overlapping the Niver Creek Trail is proposed to allow for slope and trail reconstruction, and construction of the retaining wall.

The proposed ROW acquisition of Niver Creek Open Space is not considered to be a Section 4(f) use because the land to be acquired does meet the Section 4(f) defining criteria. However, impacts to the Niver Creek Trail and connecting open space trails (recreational portions) are considered to be a Section 4(f) use. CDOT plans to formally consult with the City of Thornton in the future regarding the impacts and request written concurrence on the Section 4(f) determination.

COLORADO
Department of Transportation

Impacts to all areas and features within the Niver Creek Open Space would be subject to City of Thornton Parks and Recreation requirements and specifications for mitigation during construction, and post construction reestablishment.

Sincerely,

Veronica Reid
CDOT Region 1 Section 4(f) Specialist
veronica.reid@state.co.us / 303-757-9926

Figure 1. Civic Center Park fence on west side of property, from I-25

Source: Google Maps



Figure 2. Image from Preliminary ROW Plans, Impacts at Civic Center Park

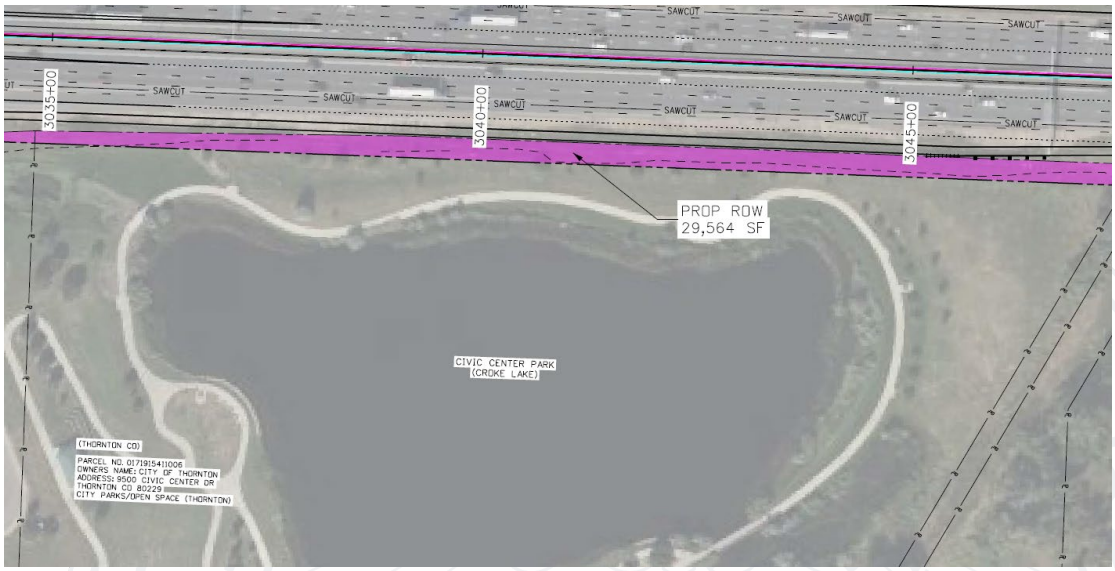
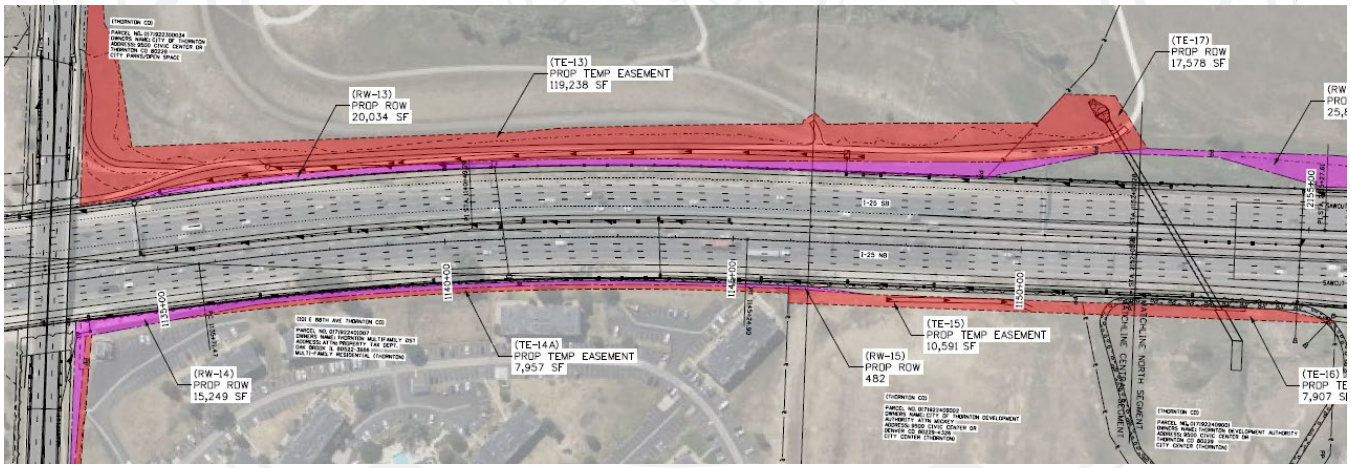


Figure 3. Image from Preliminary ROW Plans, Impacts at Niver Creek Open Space



COLORADO
Department of Transportation
Division of Transportation Development

Environmental Programs Branch
2829 W. Howard Pl., 4th Floor
Denver, CO 80204
(303) 757-9281

October 21, 2024

Ms. Dawn DiPrince
State Historic Preservation Officer
History Colorado
1200 Broadway
Denver, CO 80203

SUBJECT: Limited-Results Survey Form, Interstate Highway 25 Safety Improvements – US Highway 36 to 104th Avenue (NHPP 0253-250, SA 25536), Adams County, Colorado (Section 106 Documentation – Archaeology)

Dear Ms. DiPrince:

Attached for your files are a Limited-Results Survey Form and GIS shapefiles for a Colorado Department of Transportation (CDOT) project which proposes to construct transportation improvements to Interstate Highway 25 between US Highway 36 and 104th Avenue in Adams County. The project proposes construction of new northbound and southbound general purpose, climbing, and auxiliary lanes; new outside and inside shoulders of varying width; a replacement bridge at 88th Avenue; a median transit station at the Thornton Park-n-Ride; a new northbound two-lane collector/distributor road on the east side of I-25 between I-270 and 84th Avenue; and realignment of the I-25 adjacent existing trail and pedestrian network in the Niver Creek Open Space and its connections to the Thornton Park-n-Ride.

Because the project will utilize federal funds administered by CDOT, the project has been evaluated for compliance with Section 106 of the National Historic Preservation Act. An intensive archaeological resources survey of the area of potential effect was conducted by a consultant on behalf of CDOT with negative results. **Consequently, under Stipulation IV(G)(4) of the 2014 Section 106 Programmatic Agreement executed by our respective agencies, the report is submitted for informational purposes only and no action from your office is requested**.

If you have questions regarding the project or report, please contact CDOT Senior Staff Archaeologist Greg Wolff at (303) 757-9158 or greg.wolff@state.co.us.

Very truly yours,

Lisa Schoch
Digitally signed by Lisa Schoch
Date: 2024.10.21 12:38:57 -06'00'

Jane Hann, Manager
Environmental Programs Branch

Digital Attachments (Limited-Results Survey Form and GIS shapefiles)

COLORADO
Department of Transportation
Region 1
Planning & Environmental
2829 W. Howard Place,
Denver, CO 80204

March 14, 2025

Ms. Dawn DiPrince,
State Historic Preservation Officer
History Colorado Center
1200 Broadway
Denver, CO 80203

Re: Section 106 Determinations of Eligibility and Effects, I-25 from US 36 to 104th Avenue Safety and Operations Improvements, 25563, Adams County

Dear Ms. DiPrince,

This letter and the enclosed attachments constitute a request for concurrence on National Register of Historic Properties (NRHP) eligibility and effects under Section 106 of the National Historic Preservation Act of 1966 (36 CFR 800) for the Colorado Department of Transportation (CDOT) project: I-25 from US 36 to 104th Avenue Safety and Operations Improvements. The project will include federal funding and require approvals from the Federal Highway Administration (FHWA). CDOT is serving as the lead agency for the Section 106 process.

Previous Section 106 Consultation and NEPA Evaluations

On September 30, 2019, CDOT received concurrence from the SHPO (HC #75319) on their defined area of potential effects (APE) for the project, as well as their National Register of Historic Places (NRHP) eligibility determinations for the historic resources in the APE (Norton 2019). On behalf of CDOT, Felsburg Holt & Ullevig (FHU) drafted Historic Resources/Section 4(F) (History) Technical Report for the I-25, US36 to 104th Avenue Environmental Assessment – DRAFT in March 2020 (Attachment B) (Lloyd et al. 2020). The Environmental Assessment (EA) was not finalized, and CDOT's consultation with the SHPO on project effects was never completed. While this updated Section 106 analysis is informed by the reports completed during prior NEPA-level planning, it is based on current conditions and a revised APE.

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

Project Description

The project would improve approximately 4 miles of I-25 between US 36 and 104th Avenue. 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 (ft) buffer
- A southbound auxiliary lane between the 84th 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 and Thornton Parkway interchanges
- Inside shoulders varying in width between 2 and 12 ft and outside shoulders varying in width between 6 and 12 ft

The proposed cross section on I-25 between US 36 and 104th Avenue includes the following elements:

- Three general-purpose lanes in each direction with a fourth southbound general-purpose lane from 84th Avenue to Thornton Parkway
- A new northbound climbing lane from 84th Avenue to 104th Avenue
- An express lane in each direction, along the inside shoulder, with an expanded buffer of 4 ft from the adjacent general-purpose lane
- Continuous auxiliary lanes in both directions between the 84th Avenue and 104th Avenue interchanges
- Inside and outside shoulders with a minimum 10 ft width
- A northbound two-lane collector/distributor (CD) road on the east side of I-25 between Interstate 270 (I-270) and 84th Avenue
    - The CD road would carry traffic exiting westbound I-270 to northbound I-25, and it would also carry traffic exiting northbound I-25 to 84th Avenue
- Reconstructed Interstate 76 (I-76) and US 36 on-ramp connections and auxiliary lanes to northbound I-25
- Replacement of the 88th Avenue bridge (5AM3786)
- 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

Methodology

See enclosed *Historic Resources/Section 4(f) Technical Report* for a discussion of the Methodology (page 5) as well as a full discussion of Area of Potential Effects, Eligibility and Effects. This letter provides a brief summary of the project and determinations only.

Area of Potential Effects

The APE is "the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist" (36 CFR 800.16). CDOT defined the APE as including all areas where proposed roadway improvements, bridge replacements, and pedestrian trail realignments are anticipated. The APE also includes all proposed right-of-way (ROW) acquisitions and easements. The APE includes all age-eligible historic resources within or immediately adjacent to the Proposed Action. See *Historic Resources/Section 4(f) Technical Report* page 6.

Determination of Eligibility and Effects

See *Historic Resources/ Section 4(f) Technical Report* pages 18- 46 for eligibility determination sand pages 46-49 for effects determinations.

Table 1. Eligibility Determinations (EA NRHP Eligibility Determinations at right are for this project)

(Resource No.) Resource Name/Type	Year Built	Address/ Location	Prior NRHP Eligibility (Date of	EA NRHP Eligibility Determinations/	Effects Determination
(5AM74) Historic commercial building	Circa (ca.) 1922	7190 Washington Street	*Field not eligible* (1980)	Demolished; not reevaluated	*No historic property affected*
(5AM77) Farrel – Larson Farm	Ca. 1900	7381 Washington Street	*Officially eligible* (1981)	Demolished; not reevaluated	*No historic property affected*

(Resource No.) Resource Name/Type	Year Built	Address/ Location	Prior NRHP Eligibility (Date of	EA NRHP Eligibility Determinations/	Effects Determination
(5AM80) Lower Clear Creek Canal	Ca. 1861	From the South Platte River north to Brantner Ditch in Weld County (see OAHP survey forms for UTM data)	*Officially eligible* (1994)	*Eligible**	*No adverse effect*
Segment 5AM80.1	Ca. 1861	From the eastern terminus of segment 5AM80.6 underneath I-25 to the railroad west of Steele Street (see OAHP survey forms for UTM data)	*Officially supporting* (2009)	*Supporting**	*No adverse effect*
Segment 5AM80.6	Ca. 1861	From Broadway to the western terminus of segment 5AM60.1 underneath I-25	*Officially non-supporting* (2006)	Not reevaluated	*No historic property affected*
(5AM81) Colorado Agricultural Canal	1867	Begins at Clear Creek (see OAHP survey forms for UTM data)	*Officially not eligible* (2013)	Not reevaluated	*No historic property affected*
Segment 5AM81.1	1867	From Broadway to underneath I-25	*Officially non-supporting* (2009)	Not reevaluated	*No historic property affected*
Segment 5AM81.3	1867	From I-25 to the railroad west of Welby Road	*Officially non-supporting* (2006)	Not reevaluated	*No historic property affected*
(5AM266) Historic residence	Before 1940	7150 Lafayette Street	*Field not eligible* (1983)	Demolished; not reevaluated	*No historic property affected*
(5AM1383) Pedestrian Underpass E-17-FJ	1955	Underneath I-25 north of exit 219	*Officially not eligible* (2002)	Not reevaluated	*No historic property affected*
(5AM1760) US 36/ Denver-Boulder Turnpike	1952	From I-25 to Baseline Road	*Officially not eligible* (2006)	Not reevaluated	*No historic property affected*
Segment 5AM1760.1	1952	From I-25 to Sheridan Boulevard	*Officially non-supporting* (2006)	Not reevaluated	*no adverse effect to the overall resource 5AM1760*
(5AM1921) Olinger Chapel of the Chimes and Resource Center	1958	10375 Logan Street	*Officially not eligible* (2008)	*Not eligible**	*No historic property affected*
(5AM1922) Croke Reservoir No. 12	1936	Just west of 9601 Grant Street	*Officially not eligible* (2007)	Not reevaluated	*No historic property affected*
(5AM1923) Badding Reservoir	1936	West of I-25 at 9601 Grant Street	*Officially not eligible* (2007)	Not reevaluated	*No historic property affected*

(Resource No.) Resource Name/Type	Year Built	Address/ Location	Prior NRHP Eligibility (Date of	EA NRHP Eligibility Determinations/	Effects Determination
(5AM1924) Tuck Lateral Ditch	1887/ 1936	About 2 miles east of the Farmers Highline Canal	*Officially not eligible* (2007)	Not reevaluated	*No historic property affected*
Segment 5AM1924.1	1887/ 1936	From Melody Drive to E 98th Avenue	*Officially not eligible* (2007)	Not reevaluated	*No historic property affected*
(5AM2073) Northglenn Subdivision 1st Filing	1959	Between Washington Street and I-25, north of E 104th Avenue	*Officially needs data* (2008)	*Eligible**	*No adverse effect*
(5AM2398) 84th Avenue Overpass E-17-EZ	Ca. 1963	Overpass over E-17 on 84th Street	*Officially not eligible* (2014)	Demolished; not reevaluated	*No historic property affected*
(5AM3244) Yantorno Farm/ Center Greenhouse	Before 1914	7220 Lafayette Avenue/1550 73rd Avenue	*Officially needs data* (2014)	Demolished; not reevaluated	*No historic property affected*
(5AM3778) North Star Hills Subdivision	1962-1969	Between W 88th Avenue, Niver Creek Trail, and Huron Steet	*Officially eligible* (2019)	*Eligible**	*No adverse effect*
(5AM3779) Northview Estates Subdivision	1960-1963	Between Washington Street and I-25	*Officially eligible* (2019)	*Eligible**	*No adverse effect*
(5AM3780) Sherrelwood Estates	1959-1971	Between W 83rd Place, I-25/Sherman Street, Del Norte Street, and Conifer Road	*Officially not eligible* (2019)	Not reevaluated	*No historic property affected*
(5AM3782) Falk Industrial Tract	1971	8225 N Valley Highway	*Officially not eligible* (2019)	*Not eligible**	*No historic property affected*
(5AM3783) Village Inn Restaurant	1969	8370 Sherman Way	*Officially not eligible* (2019)	Not reevaluated	*No historic property affected*
(5AM3784) North Valley Shopping Center	1967	500 E 84th Avenue	*Officially not eligible* (2019)	Not reevaluated	*No historic property affected*
(5AM3785) Cordova 88 PUD/Ashford East 88 Apartment Homes	1973	101 E 88th Avenue	*Officially not eligible* (2019)	*Not eligible**	*No historic property affected*
(5AM3786) 88th Avenue Bridge over I-25/Structure E-17-LE	1972	Bridge on 88th Avenue over I-25	*Officially not eligible* (2019)	Not reevaluated	*No historic property affected*
(5AM3787) Sherman Street Apartments	1971	7524 and 7556 Sherman Street	*Officially not eligible* (2019)	*Not eligible**	*No historic property affected*
(5AM3935) Black Eyed Pea Restaurant	1970	211 W 104th Avenue	*Officially not eligible* (2019)	*Not eligible**	*No historic property affected*

(Resource No.) Resource Name/Type	Year Built	Address/ Location	Prior NRHP Eligibility (Date of	EA NRHP Eligibility Determinations/	Effects Determination
(5AM3936) Northglenn Subdivision 3rd, 8th, 19th Filing	1959-1964	Between 104th Avenue, Bannock Street/I-25, Melody Drive, and Huron Street	*Officially eligible* (2019)	*Eligible**	*No adverse effect*
(5AM3996) 88th Avenue	Ca. 1890	88th Ave	N/A	*Eligible**	*No adverse effect*
Segment 5AM3996.3	Ca. 1978	88th Ave between N Pecos St and the western extent of 5AM3996.1	N/A	*Non-supporting**	*No adverse effect to the overall resource 5AM3996*
(5AM4335) Weingarten Farmstead	1913, 1937, 1958	501 E 80th Ave	N/A	*Eligible**	*No adverse effect*
(5AM4346) Hughes Industrial Park	1974-1979, 1998	500 E 76th Ave	N/A	*Not eligible**	*No historic property affected*
(5AM4347) Brozovich Farm	1917	7451 Washington St	N/A	*Not eligible**	*No historic property affected*
(5AM4348) Nolan Residence	1938	600 E 76th Ave	N/A	*Not eligible**	*No historic property affected*
(5AM4349) Pugnetti Residence	1957	450 E 76th Ave	N/A	*Eligible**	*No adverse effect*
(5AM4350) Keegan Residence	1931	410 E 76th Ave	N/A	*Not eligible**	*No historic property affected*
(5AM4351) Smith Residence	1935	390 E 76th Ave	N/A	*Not eligible**	*No historic property affected*
(5AM4353) AMF Sonesta Lanes	1979	401 E 88th Ave	N/A	*Needs data**	*No historic property affected*
(5AM4354) Tacos Menny/Amando's Barbershop	1974	281 E 88th Ave	N/A	*Not eligible**	*No historic property affected*
(5AM4355) A Better Place Funeral & Cremation Services	1952	7261 Washington St	N/A	*Not eligible**	*No historic property affected*
(5AM4356) Boyer's Coffee Cafe Truck and Coffee Cottage	1927	7295 Washington St	N/A	*Not eligible**	*No historic property affected*
(5AM4357) Cobblestone Car Wash	1974	8431 Grant St	N/A	*Not eligible**	*No historic property affected*
(5AM4358) Ramos Law	1980	10190 Bannock St	N/A	*Not eligible**	*No historic property affected*

(Resource No.) Resource Name/Type	Year Built	Address/ Location	Prior NRHP Eligibility (Date of	EA NRHP Eligibility Determinations/	Effects Determination
(5AM4359) Valley Hi Subdivision First Filing	1959	Between 80th Ave and 78th Pl	N/A	*Not eligible**	*No historic property affected*
(5AM4360) Del Norte St CDOT Maintenance Yard	Ca. 1956	Del Norte St	N/A	*Not eligible**	*No historic property affected*
(5AM4361) Drainage pond	Ca. 1957-1963	Drainage pond north of 10190 Bannock St and I-25	N/A	*Not eligible**	*No historic property affected*
(25563_AM_76thAve) 76th Avenue	Before 1940	76th Ave	N/A	*Not eligible**	*No historic property affected*
(25563_AM_80thAve) 80th Avenue	Before 1940	80th Ave	N/A	*Not eligible**	*No historic property affected*

Section 4(f) *De Minimis* Notification

Section 4(f) of the Department of Transportation Act of 1966 applies when a transportation project requires the use of a historic site. A resource is considered a historic site under Section 4(f) if it is listed in or determined eligible for listing in the NRHP. For this Proposed Action, CDOT made the Section 106 finding of *no adverse effect* for the eight resources determined eligible (5AM80, 5AM2073, 5AM3778, 5AM3779, 5AM3936, 5AM3996, 5AM4335, and 5AM4349) and one resource determined needs data (5AM4353). This finding reflects the conclusion that this project will not "alter, directly or indirectly, any of the characteristics of [the] historic properties that qualify the properties 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). Based on these findings of no adverse effect, CDOT is informing the SHPO that the FHWA may make a *de minimis* finding for the resources, as described above.

Summary

We are concurrently sending this information and the enclosed effects report to Adams County, and the cities of Thornton and Northglenn as consulting parties. We will keep you informed of any comments received from these consulting parties. We will coordinate any changes to the project's effects resulting from updated designs with your office and with consulting parties.

At this time, we request your concurrence with the effects determinations outlined above. For additional information, contact CDOT Cultural Resources Manager and Senior Historian Lisa Schoch at lisa.schoch@state.co.us and CDOT Region 1 Historian Jamie Shapiro at jamie.shapiro@state.co.us.

Sincerely,

Lisa Streisfeld

Digitally signed by Lisa Streisfeld
Date: 2025.03.14 11:57:32 -06'00'

Lisa Streisfeld
Region 1 Environmental Manager

Enclosed: Determination of Effects and Historic Section 4(f) Report

COLORADO
Department of Transportation
Region 1
Planning & Environmental
2829 W. Howard Place,
Denver, CO 80204

March 14, 2025

Jenni Hall
Community and Economic Development Director
Adams County 4430 S. Adams County Parkway
Brighton, Colorado 80601

Brook Svoboda
Director, Planning and Development Department
Northglenn 11701 Community Center Drive
Northglenn, Colorado 80233

City of Thornton Planning & Development
Thornton 9500 Civic Center Drive
Thornton, Colorado 80229

Re: Section 106 Determinations of Eligibility and Effects, I-25 from US 36 to 104th Avenue Safety and Operations Improvements, 25563, Adams County

Dear Ms. Hall, Mr. Svoboda, and Thornton Planning,

This letter and the enclosed attachments constitute a request for comments on National Register of Historic Properties (NRHP) eligibility and effects under Section 106 of the National Historic Preservation Act of 1966 (36 CFR 800) for the Colorado Department of Transportation (CDOT) project: I-25 from US 36 to 104th Avenue Safety and Operations Improvements. The project will include federal funding and require approvals from the Federal Highway Administration (FHWA). CDOT is serving as the lead agency for the Section 106 process. We are contacting you as a consulting party.

Previous Section 106 Consultation and NEPA Evaluations

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Project Description

The project would improve approximately 4 miles of I-25 between US 36 and 104th Avenue. 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 (ft) buffer
- A southbound auxiliary lane between the 84th and US 36 interchanges
- A southbound auxiliary lane between the 88th Avenue transit slip ramp and the 84th Avenue interchange
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- Inside shoulders varying in width between 2 and 12 ft and outside shoulders varying in width between 6 and 12 ft

The proposed cross section on I-25 between US 36 and 104th Avenue includes the following elements:

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- Continuous auxiliary lanes in both directions between the 84th Avenue and 104th Avenue interchanges
- Inside and outside shoulders with a minimum 10 ft width
- A northbound two-lane collector/distributor (CD) road on the east side of I-25 between Interstate 270 (I-270) and 84th Avenue
    - The CD road would carry traffic exiting westbound I-270 to northbound I-25, and it would also carry traffic exiting northbound I-25 to 84th Avenue
- Reconstructed Interstate 76 (I-76) and US 36 on-ramp connections and auxiliary lanes to northbound I-25
- Replacement of the 88th Avenue bridge (5AM3786)
- 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

Methodology

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Determination of Eligibility and Effects

See *Historic Resources/ Section 4(f) Technical Report* pages 18- 46 for eligibility determination sand pages 46-49 for effects determinations.

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(5AM77) Farrel – Larson Farm	Ca. 1900	7381 Washington Street	*Officially eligible* (1981)	Demolished; not reevaluated	*No historic property affected*
(5AM80) Lower Clear Creek Canal	Ca. 1861	From the South Platte River north to Brantner Ditch in Weld County (see OAHP survey forms for UTM data)	*Officially eligible* (1994)	*Eligible**	*No adverse effect*
Segment 5AM80.1	Ca. 1861	From the eastern terminus of segment 5AM80.6 underneath I-25 to the railroad west of Steele Street (see OAHP survey forms for UTM data)	*Officially supporting* (2009)	*Supporting**	*No adverse effect*
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(5AM266) Historic residence	Before 1940	7150 Lafayette Street	*Field not eligible* (1983)	Demolished; not reevaluated	*No historic property affected*
(5AM1383) Pedestrian Underpass E-17-FJ	1955	Underneath I-25 north of exit 219	*Officially not eligible* (2002)	Not reevaluated	*No historic property affected*
(5AM1760) US 36/ Denver-Boulder Turnpike	1952	From I-25 to Baseline Road	*Officially not eligible* (2006)	Not reevaluated	*No historic property affected*
Segment 5AM1760.1	1952	From I-25 to Sheridan Boulevard	*Officially non-supporting* (2006)	Not reevaluated	*NA*
(5AM1921) Olinger Chapel of the Chimes and Resource Center	1958	10375 Logan Street	*Officially not eligible* (2008)	*Not eligible**	*No historic property affected*

(Resource No.) Resource Name/Type	Year Built	Address/ Location	Prior NRHP Eligibility (Date of	EA NRHP Eligibility Determinations/	Effects Determination
(5AM1922) Croke Reservoir No. 12	1936	Just west of 9601 Grant Street	*Officially not eligible* (2007)	Not reevaluated	*No historic property affected*
(5AM1923) Badding Reservoir	1936	West of I-25 at 9601 Grant Street	*Officially not eligible* (2007)	Not reevaluated	*No historic property affected*
(5AM1924) Tuck Lateral Ditch	1887/ 1936	About 2 miles east of the Farmers Highline Canal	*Officially not eligible* (2007)	Not reevaluated	*No historic property affected*
Segment 5AM1924.1	1887/ 1936	From Melody Drive to E 98th Avenue	*Officially not eligible* (2007)	Not reevaluated	*No historic property affected*
(5AM2073) Northglenn Subdivision 1st Filing	1959	Between Washington Street and I-25, north of E 104th Avenue	*Officially needs data* (2008)	*Eligible**	*No adverse effect*
(5AM2398) 84th Avenue Overpass E-17-EZ	Ca. 1963	Overpass over E-17 on 84th Street	*Officially not eligible* (2014)	Demolished; not reevaluated	*No historic property affected*
(5AM3244) Yantorno Farm/ Center Greenhouse	Before 1914	7220 Lafayette Avenue/1550 73rd Avenue	*Officially needs data* (2014)	Demolished; not reevaluated	*No historic property affected*
(5AM3778) North Star Hills Subdivision	1962-1969	Between W 88th Avenue, Niver Creek Trail, and Huron Steet	*Officially eligible* (2019)	*Eligible**	*No adverse effect*
(5AM3779) Northview Estates Subdivision	1960-1963	Between Washington Street and I-25	*Officially eligible* (2019)	*Eligible**	*No adverse effect*
(5AM3780) Sherrelwood Estates	1959-1971	Between W 83rd Place, I-25/Sherman Street, Del Norte Street, and Conifer Road	*Officially not eligible* (2019)	Not reevaluated	*No historic property affected*
(5AM3782) Falk Industrial Tract	1971	8225 N Valley Highway	*Officially not eligible* (2019)	*Not eligible**	*No historic property affected*
(5AM3783) Village Inn Restaurant	1969	8370 Sherman Way	*Officially not eligible* (2019)	Not reevaluated	*No historic property affected*
(5AM3784) North Valley Shopping Center	1967	500 E 84th Avenue	*Officially not eligible* (2019)	Not reevaluated	*No historic property affected*
(5AM3785) Cordova 88 PUD/Ashford East 88 Apartment Homes	1973	101 E 88th Avenue	*Officially not eligible* (2019)	*Not eligible**	*No historic property affected*
(5AM3786) 88th Avenue Bridge over I-25/Structure E-17-LE	1972	Bridge on 88th Avenue over I-25	*Officially not eligible* (2019)	Not reevaluated	*No historic property affected*
(5AM3787) Sherman Street Apartments	1971	7524 and 7556 Sherman Street	*Officially not eligible* (2019)	*Not eligible**	*No historic property affected*

(Resource No.) Resource Name/Type	Year Built	Address/ Location	Prior NRHP Eligibility (Date of	EA NRHP Eligibility Determinations/	Effects Determination
(5AM3935) Black Eyed Pea Restaurant	1970	211 W 104th Avenue	*Officially not eligible* (2019)	*Not eligible**	*No historic property affected*
(5AM3936) Northglenn Subdivision 3rd, 8th, 19th Filing	1959-1964	Between 104th Avenue, Bannock Street/I-25, Melody Drive, and Huron Street	*Officially eligible* (2019)	*Eligible**	*No adverse effect*
(5AM3996) 88th Avenue	Ca. 1890	88th Ave	N/A	*Eligible**	*No adverse effect*
Segment 5AM3996.3	Ca. 1978	88th Ave between N Pecos St and the western extent of 5AM3996.1	N/A	*Non-supporting**	*No adverse effect to the overall resource 5AM3996*
(5AM4335) Weingarten Farmstead	1913, 1937, 1958	501 E 80th Ave	N/A	*Eligible**	*No adverse effect*
(5AM4346) Hughes Industrial Park	1974-1979, 1998	500 E 76th Ave	N/A	*Not eligible**	*No historic property affected*
(5AM4347) Brozovich Farm	1917	7451 Washington St	N/A	*Not eligible**	*No historic property affected*
(5AM4348) Nolan Residence	1938	600 E 76th Ave	N/A	*Not eligible**	*No historic property affected*
(5AM4349) Pugnetti Residence	1957	450 E 76th Ave	N/A	*Eligible**	*No adverse effect*
(5AM4350) Keegan Residence	1931	410 E 76th Ave	N/A	*Not eligible**	*No historic property affected*
(5AM4351) Smith Residence	1935	390 E 76th Ave	N/A	*Not eligible**	*No historic property affected*
(5AM4353) AMF Sonesta Lanes	1979	401 E 88th Ave	N/A	*Needs data**	*No historic property affected*
(5AM4354) Tacos Menny/Amando's Barbershop	1974	281 E 88th Ave	N/A	*Not eligible**	*No historic property affected*
(5AM4355) A Better Place Funeral & Cremation Services	1952	7261 Washington St	N/A	*Not eligible**	*No historic property affected*
(5AM4356) Boyer's Coffee Cafe Truck and Coffee Cottage	1927	7295 Washington St	N/A	*Not eligible**	*No historic property affected*
(5AM4357) Cobblestone Car Wash	1974	8431 Grant St	N/A	*Not eligible**	*No historic property affected*

(Resource No.) Resource Name/Type	Year Built	Address/ Location	Prior NRHP Eligibility (Date of	EA NRHP Eligibility Determinations/	Effects Determination
(5AM4358) Ramos Law	1980	10190 Bannock St	N/A	*Not eligible**	*No historic property affected*
(5AM4359) Valley Hi Subdivision First Filing	1959	Between 80th Ave and 78th Pl	N/A	*Not eligible**	*No historic property affected*
(5AM4360) Del Norte St CDOT Maintenance Yard	Ca. 1956	Del Norte St	N/A	*Not eligible**	*No historic property affected*
(5AM4361) Drainage pond	Ca. 1957-1963	Drainage pond north of 10190 Bannock St and I-25	N/A	*Not eligible**	*No historic property affected*
(25563_AM_76thAve) 76th Avenue	Before 1940	76th Ave	N/A	*Not eligible**	*No historic property affected*
(25563_AM_80thAve) 80th Avenue	Before 1940	80th Ave	N/A	*Not eligible**	*No historic property affected*

Request

We are concurrently sending this information and the enclosed effects report to the State Historic Preservation Officer (SHPO). We will keep you informed of any comments they provide. Please respond to both emails below with any comments by **April 14, 2025**. If we don't receive comments by that date, we will assume you have none. Please also respond if you have no comments to help us expedite our process.

For questions and to send comments, contact CDOT Cultural Resources Manager and Senior Historian Lisa Schoch at lisa.schoch@state.co.us and CDOT Region 1 Historian Jamie Shapiro at jamie.shapiro@state.co.us.

Sincerely,

Lisa Streisfeld

Digitally signed by Lisa Streisfeld
Date: 2025.03.14 11:56:22 -06'00'

Lisa Streisfeld
Region 1 Environmental Manager

Enclosed: Determination of Effects and Historic Section 4(f) Report

Attachment C.

RTD and Thornton Design Coordination

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Regional Transportation District (RTD) and City of Thornton Coordination Meetings

In addition to other meetings mentioned within the Environmental Assessment, the following meetings were held with RTD and the City of Thornton coordination staff. Meetings with RTD were held to conduct design charettes around the median transit station, which has since been eliminated from the Proposed Action. Coordination meetings with City of Thornton were held to provide progress updates, inform the Project team of city initiatives, discuss technical details, and consider public input received.

Entity	Date	Meeting
Thornton	February 16, 2023	Transit Analysis Alternatives Follow-Up Meeting
Thornton	March 30, 2023	Transit Analysis Stakeholders Meeting
Thornton	February 20, 2024	Agency Stakeholder Scoping Meeting (VIRTUAL)
Thornton	February 28, 2024	Northbound EMS Only Exit Ramp to NSMC Discussion (VIRTUAL)
Thornton	March 6, 2024	88th Avenue Bridge Width and Reconstruction Meeting
Thornton	March 7, 2024	Niver Creek Floodplain Meeting
Thornton	April 10, 2024	88th Avenue Bridge Stakeholder Discussion
RTD	May 22, 2024	Median Transit Station Alternatives Meeting with RTD
RTD	May 30, 2024	RTD Design Charette Level 1 Meeting
Thornton	June 27, 2024	Agency Stakeholder Meeting Update (VIRTUAL)
Thornton	July 8, 2024	88th Avenue Corridor Study Stakeholder Meeting
RTD	August 20, 2024	RTD Design Charette Level 2 Meeting
Thornton	September 5, 2024	Niver Creek Trail Realignment Meeting
RTD	October 1, 2024	RTD Design Charette Level 3 Meeting
Thornton	October 10, 2024	Niver Creek Realignment Discussion
Thornton	November 6, 2024	88th Avenue Bridge Profile Meeting
Thornton	December 18, 2024	88th Avenue Corridor Study Stakeholder Meeting
RTD & Thornton	June 30, 2025	I-25 Segment 2 Stakeholder Meeting
Thornton	July 16, 2025	Drainage Discussion with City of Thornton

Entity	Date	Meeting
RTD	September 23, 2025	Coordination for Upcoming Public Meeting
RTD & Thornton	September 23, 2025	I-25 (US 36 to 104th Ave) Stakeholder Meeting (VIRTUAL)
Thornton	September 30, 2025	Niver Creek Trail Connection to 88th Ave Meeting
Thornton	October 9, 2025	Drainage Discussion with City of Thornton – Design Follow-Up
RTD & Thornton	October 22, 2025	Second Public Scoping Meeting
RTD	November 4, 2025	120X Ridership Data Review
RTD	November 13, 2025	Meet re: Route 120X Ridership (CDOT/RTD)
RTD & Thornton	November 20, 2025	I-25 (US 36 to 104th Ave) FIR Meeting
RTD	December 16, 2025	I-25 & 88th Ave Station Coordination (RTD/CDOT) – Timeline Draft
Thornton	December 17, 2025	I-25 (US 36 to 104th) Drainage TWG Meeting
Thornton	December 18, 2025	I-25 (US 36 to 104th Ave) Niver Creek Thornton CLOMR
RTD	January 20, 2026	I-25 & 88th Ave/Thornton PnR – CDOT/RTD Meeting #2
Thornton	January 29, 2026	Project Improvement Requests by City of Thornton
RTD	February 10, 2026	I-25 & 88th Ave/Thornton PnR – CDOT/RTD Coordination Meeting
Thornton	February 12, 2026	Project Improvement Requests by City of Thornton Meeting #2
Thornton	March 5, 2026	Project Improvement Requests by City of Thornton Meeting #3
RTD	March 10, 2026	I-25 & 88th Ave/Thornton PnR – CDOT/RTD Coordination Meeting
Thornton	March 19, 2026	Review 88th Ave Bridge and Barrier/Fence Exhibits with City of Thornton
Thornton	April 2, 2026	Follow-Up Review 88th Ave Bridge and Barrier/Fence Exhibits with City of Thornton
RTD & Thornton	April 21, 2026	I-25 & 88th Ave/Thornton PnR – CDOT/RTD Coordination Meeting
Thornton	April 23, 2026	MHFD/Thornton Niver Creek Floodplain Coordination
RTD & Thornton	May 5, 2026	I-25 & 88th Ave/Thornton PnR – CDOT/RTD Coordination Meeting
Thornton	May 8, 2026	Thornton Agenda

Entity	Date	Meeting
Thornton	May 11, 2026	Follow-Up Wall/Fence Discussion with City of Thornton
Thornton	May 13, 2026	Existing/Proposed ROW Lease Discussion
RTD & Thornton	May 19, 2026	I-25 & 88th Ave/Thornton PnR – CDOT/RTD Coordination Meeting
Thornton	June 4, 2026	Drainage and Ongoing Project Improvements Discussion with City of Thornton
RTD & Thornton	June 16, 2026	I-25 & 88th Ave/Thornton PnR – CDOT/RTD Coordination Meeting
Thornton	June 23, 2026	Olinger Cemetery Field Visit
Mile Hight Flood District	June 24, 2026	I-25 (US 36 to 104th) Niver Creek Stream Realignment Design and Coordination
Thornton	June 26, 2026	Xcel Coordination Follow-Up
Mile High Flood District	July 10, 2026	I-25 (US 36 to 104th) Niver Creek Discussion
RTD & Thornton	August 6, 2026	Thornton PnR Field Visit for Irrigation Testing and Landscape Inventory
RTD	August 11, 2026	I-25 & 88th Ave/Thornton PnR – CDOT/RTD Coordination Meeting
RTD	August 12, 2026	Thornton PnR - West Side Irrigation
Thornton	August 13, 2026	Niver Creek CLOMR Review Meeting
Thornton	August 17, 2026	I-25 Segment 2 Sanitary Sewer Relocation
Thornton & Mile High Flood District	August 24, 2026	I-25 (US 36 to 104th Ave) CLOMR Pre-Application Meeting
Adams County	August 25, 2026	I-25 (US 36 to 104th) Discuss Project Improvement Meeting #1
RTD	August 25, 2026	I-25 & 88th Ave/Thornton PnR – CDOT/RTD Coordination Meeting
Thornton	August 27, 2026	Project Improvement Update with City of Thornton Meeting #9
Thornton	September 3, 2026	Thornton Lighting Discussion Meeting #1
Thornton	September 3, 2026	Thornton Landscaping Requirements Discussion
RTD & Thornton	September 8, 2026	I-25 & 88th Ave/Thornton PnR – CDOT/RTD Coordination Meeting
Adams County	September 15, 2026	I-25 Debrief Meeting with Adams County
Thornton	September 16, 2026	Drainage TWG Meeting
Thornton	September 22, 2026	Thornton Park-n-Ride Landscaping

Entity	Date	Meeting
RTD & Thornton	September 22, 2026	I-25 & 88th Ave/Thornton PnR – CDOT/RTD Coordination Meeting
Thornton & Mile High Flood District	September 23, 2026	Drainage TWG Meeting
Northglenn	September 29, 2026	Northglenn/Olinger Cemetery Meeting
Thornton	September 29, 2026	Thornton City Surveyor/Attorney Meeting

Attachment D.

Tribal Coordination

Attachment D. Tribal Coordination

CDOT is dedicated to providing an accessible experience for everyone. While we are continuously improving our standards, some complex items in this document, such as certain figures and images, are difficult to create with fully accessible parameters to all users. If you need help understanding any part of this document, we are here to assist and have resources to provide additional accessibility assistance to any requests. Please email us at CDOT_Accessibility@state.co.us to request an accommodation, and a member of our I-25 Engineering Program will schedule a time to review the content with you. To learn more about accessibility at CDOT, please visit the Accessibility at CDOT webpage on the CDOT Website.

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.