



# **Section 4(f) Resources Technical Report - I-270 Corridor Improvements Environmental Impact Statement**

**Federal Project No.: STU 2706-046**

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## Acronyms and Abbreviations

| Acronym           | Definition                               |
|-------------------|------------------------------------------|
| APE               | Area of Potential Effect                 |
| BNSF              | BNSF Railway                             |
| CDOT              | Colorado Department of Transportation    |
| CFR               | Code of Federal Regulations              |
| Commerce City     | City of Commerce City                    |
| COTREX            | Colorado Trails Explorer                 |
| CPW               | Colorado Parks and Wildlife              |
| Denver            | City and County of Denver                |
| DPR               | Denver Parks and Recreation              |
| DRCOG             | Denver Regional Council of Governments   |
| EIS               | Environmental Impact Statement           |
| FHWA              | Federal Highway Administration           |
| GIS               | Geographic Information Systems           |
| I-25              | Interstate 25                            |
| I-270             | Interstate 270                           |
| I-70              | Interstate 70                            |
| I-76              | Interstate 76                            |
| ITS               | Intelligent Transportation Systems       |
| LWCF              | Land and Water Conservation Fund         |
| mph               | miles per hour                           |
| National Register | National Register of Historic Places     |
| NEPA              | National Environmental Policy Act        |
| NPS               | National Park Service                    |
| OTIS              | Online Transportation Information System |
| OWJ               | Official with Jurisdiction               |
| PCMD              | Park Creek Metropolitan District         |
| ROW               | Right-of-Way                             |
| RTD               | Regional Transportation District         |
| SCRGP             | Sand Creek Regional Greenway Partnership |
| SHPO              | State Historic Preservation Officer      |
| US 6              | United States Highway 6                  |
| US 85             | United States Highway 85                 |
| US                | United States                            |
| USC               | United States Code                       |
| WPA               | Works Progress/Projects Administration   |

## 1.0 Introduction

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](mailto:CDOT_Accessibility@state.co.us) to request an accommodation, and a member of our I-270 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](#).

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

This technical report evaluates and documents potential impacts to and recommended mitigation measures for Section 4(f) resources. It supports the analysis and conclusions in the EIS. For more details on historic and recreational resources, see the *Historic Resources Technical Report*, *Archaeological Resources Technical Report*, and the *Recreational and Section 6(f) Resources Technical Report*.

### 1.1 Project Description

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

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

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

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

**I-270 Corridor Improvements**

- Project Limits
- County Boundary
- Lakes/Ponds

0 2,250 4,500 Feet

**COLORADO**  
Department of Transportation

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

Page 2

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

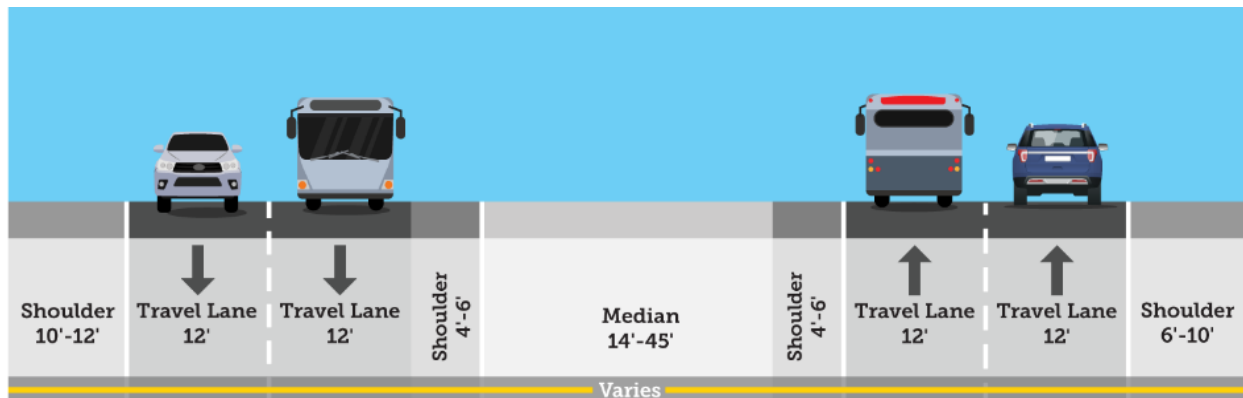
The No Action Alternative is also fully evaluated as a baseline for comparison.

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

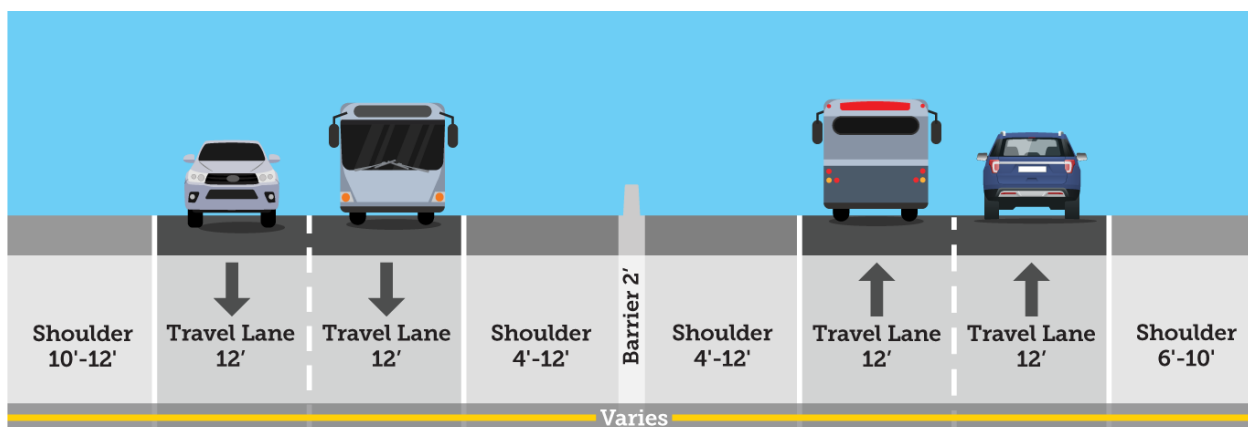
## 2.1 No Action Alternative

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

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



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



## 2.2 Build Alternatives

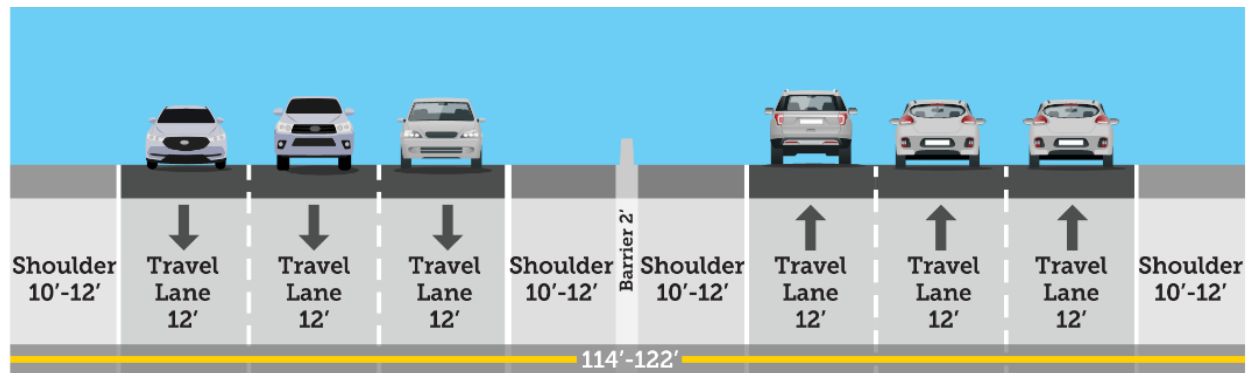
The build alternatives include improving the operational and physical conditions of the I-270 highway; reconfiguring interchanges and ramps; enhancing transit on the corridor; improving

bicycle and pedestrian access across I-270; replacing deficient bridges and other infrastructure; and providing modern drainage, water quality, intelligent transportation systems (ITS), and other supporting infrastructure. Both add one new travel lane in each direction and have similar footprints, varying primarily how the additional travel operates.

## 2.3 Three General-Purpose Lanes Alternative

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

**Figure 4. Three General-Purpose Lanes Alternative**



This alternative includes:

### Mainline Improvements

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

### Interchange Improvements

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

### Bridge Improvements

- Reconstructing bridges that are at, or will be reaching, the end of their useful life. Bridges carrying travel lanes on I-270 include widening to accommodate additional lanes

- Replacing the existing York Street bridge over I-270 to meet current bridge standards, accommodate an additional travel lane in each direction on York Street, include a 10-foot multi-use path and a 5-foot sidewalk, and enhance lighting
- Replacing the existing I-270 bridges over the South Platte River Trail to meet current bridge standards, accommodate this project's bicycle and pedestrian improvements on the South Platte River Trail, and enhance lighting
- Replacing the existing I-270 bridges over the Burlington Ditch to meet current bridge standards, accommodate future bicycle and pedestrian improvements, and enhance lighting
- Replacing the existing I-270 bridges over Brighton Boulevard to meet current bridge standards, accommodate this project's bicycle and pedestrian improvements on Brighton Boulevard and future bicycle and pedestrian improvements by others, and enhance lighting
- Replacing the existing I-270 bridges over East 60th Avenue and the BNSF Railway (BNSF) crossing to meet current bridge standards, accommodate future bicycle and pedestrian improvements, and enhance lighting
- Replacing the existing I-270 bridges over East 56th Avenue to meet current bridge standards, accommodate this project's bicycle and pedestrian improvements, and enhance lighting
- Replacing the existing Vasquez Boulevard bridge over Sand Creek to meet current bridge standards and accommodate this project's bicycle and pedestrian improvements

### **Bicycle and Pedestrian Improvements**

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

### **Trail Improvements**

- Reconfiguring the South Platte River Trail crossing under I-270 to improve bicycle and pedestrian visibility around tight curves and increase vertical clearance from the I-270 overpass

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

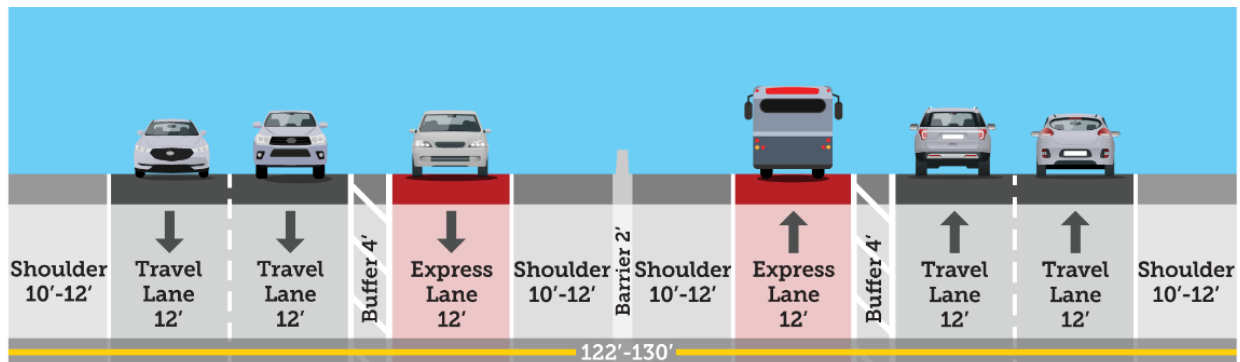
### Transit Improvements

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

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

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

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



This alternative includes:

#### Mainline Improvements

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

#### Interchange Improvements

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

#### Bridge Improvements

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

#### Bicycle, Pedestrian, Trail, and Transit Improvements

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

## 3.0 Context

### 3.1 Section 4(f)

Section 4(f) of the United States (U.S.) Department of Transportation Act of 1966 is codified at 23 United States Code (USC) §138 and 49 USC §303 and implemented through 23 Code of Federal Regulations (CFR) §774. Section 4(f) stipulates that FHWA and other Department of Transportation agencies cannot approve the use of land from significant publicly owned parks, recreation areas, wildlife and waterfowl refuges, and significant historic sites, whether publicly or privately owned, for transportation projects unless one of the following occurs:

- FHWA determines that the impacts are *de minimis*, after taking into account all avoidance, minimization, mitigation, or enhancement measures; or
- FHWA determines that there is no feasible and prudent avoidance alternative to the use of land from the property; and the action includes all possible planning to minimize harm to the property resulting from such use.

The Secretary of Transportation has delegated authority for administering Section 4(f) to federal transportation agencies, including FHWA. In administering Section 4(f), FHWA has defined a historic site as a historic property that is on or eligible for listing in the National Register of Historic Places (National Register).

The FHWA Section 4(f) Policy Paper (FHWA, 2012) provides guidance on how to interpret Section 4(f). Part II of the document includes questions and answers regarding Section 4(f) applicability and compliance.

### 3.2 Section 4(f) Properties

According to the FHWA Environmental Review Toolkit (FHWA, n.d.), Section 4(f) requires consideration of:

- Historic sites of national, state, or local significance in public or private ownership regardless of whether they are open to the public (See 23 U.S.C. § 138(a) and 49 U.S.C. § 303(a))
- Parks and recreational areas of national, state, or local significance that are both publicly owned and open to the public
  - The term "significant" means that in comparing the availability and function of the park, recreation area or refuge, with the park, recreation or refuge objectives of the agency, community or authority, the property in question plays an important role in meeting those objectives.
- Publicly owned wildlife and waterfowl refuges of national, state, or local significance that are open to the public to the extent that public access does not interfere with the primary purpose of the refuge
  - The primary purpose of parks and recreations areas is related to the property's primary function and how it is intended to be managed. This is determined through review of any existing master or management plans and consultation with the official(s) with jurisdiction (OWJ).

### 3.3 Section 4(f) Uses

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

- Permanent Incorporation. Land is considered permanently incorporated into the transportation facility when it has been purchased as right-of-way (ROW), or when a permanent easement has been acquired.
- Temporary Occupancy. When there is a temporary occupancy of land that does not meet the following requirements, as stated in 23 CFR §774.13(d):
  - The duration of use must be temporary. The use of the Section 4(f) resource should be less than the time needed for construction of the project, and there should be no change in land ownership.
  - The scope of work must be minor. Both the nature and the magnitude of the changes must be minimal.
  - There are no anticipated permanent adverse physical impacts, nor interference with the protected activities, features, or attributes of the property on either a temporary or permanent basis.
  - The land being used must be fully restored. The property must be returned to a condition that is at least as good as the condition in which it existed prior to the project. There must be a documented agreement from the OWJ over the Section 4(f) resource regarding the above conditions.
- Constructive Use. A constructive use occurs when the transportation project does not incorporate land from a Section 4(f) property, but the project's proximity impacts are so

severe that the protected activities, features, or attributes that qualify a resource for protection under Section 4(f) are substantially impaired.

### 3.4 *de minimis* Impact

Certain uses of Section 4(f) land may have a minimal or *de minimis* impact on the protected resource. When this is the case, FHWA can make a *de minimis* impact determination. A *de minimis* impact to a Section 4(f) property is defined as that which does not “adversely affect the features, attributes or activities qualifying the property for protection under Section 4(f).” This determination can be made only after the concurrence of the OWJ and opportunity for public review and comment on the proposed determination. Use of properties with *de minimis* impacts do not require an analysis of avoidance alternatives or a least harm analysis (FHWA, 2012).

## 4.0 Methods

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

### 4.1 Data Gathering

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

- Compass, History Colorado’s database of previously recorded historic sites
- Other databases, such as the CDOT Historic Sites Viewer
- Local planning documents
- Local agency recreation centers, parks, trails, and open space static maps
- DRCOG Geographic Information Systems (GIS) data
- Colorado Trail Explorer (COTREX)
- Google Maps
- Adams County GIS data
- Commerce City GIS data
- Denver GIS data

### 4.2 Analysis Approach

### 4.3 Historic Resources

Historic properties within the Area of Potential Effects (APE) (“historic resources study area”) were identified by CDOT, acting on behalf of FHWA, consistent with 36 CFR §800.4 (Figure 6). The APE for this EIS covers the entire 6.5-mile study corridor of I-270 and adjacent properties built in 1980 or earlier that may be subject to direct or indirect effects caused by proposed transportation improvements. The APE encompasses the following: the footprint of the proposed design, including the associated right-of-way of I-270; areas where water quality improvements, embankments, noise walls, retaining walls, barriers, and construction staging are anticipated; full parcels identified as noise receptors under the Traffic Noise Technical

Report (CDOT, 2024); full parcels where the anticipated design is outside of or on the right-of-way line; and logical segments of linear features more than 45 years of age that intersect I-270, such as roadways, railroads, and ditches. For more information, see the *Historic Resources Technical Report*.

Per 23 USC 138(a), FHWA cannot approve the use of land from a 4(f) resource unless there is “no prudent and feasible alternative,” and the project includes “all possible planning to minimize harm.” Section 4(f) regulations require rigorous consideration when a project proposes use of a “historic site,” defined as a National Register eligible or listed property. For Section 4(f) evaluations, “use” occurs when land from a historic site is permanently incorporated into a transportation facility (such as a permanent easement or right-of-way). Temporary impacts to a historic property or severe proximity impacts (resulting in a “constructive use”) can also be considered a use under Section 4(f). Consistent with 23 CFR 774.5(b) and 774.17, FHWA can make a *de minimis* finding under Section 4(f) if a project’s use of a historic site results in “no adverse effect” determination under the Section 106 process, and the State Historic Preservation Officer (SHPO), acting as the OWJ for Section 4(f), concurs with these findings in writing.

## 4.4 Recreational Resources

Recreational resources within a 0.25-mile buffer (“recreational resources study area”) from the I-270 mainline between I-25 and I-70 are documented in the existing conditions inventory (Figure 7, Figure 8, and Figure 9). The study area was established to capture all possible project alternatives and existing recreational resources that could be directly or indirectly impacted.

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

- “Use” a Section 4(f) resource as defined under 23 CFR 774.17. An individual Section 4(f) analysis may be required that includes avoidance alternatives, discussion of prudent and feasible, least-harm analysis, minimization, and mitigation related to Section 4(f) properties
- Impact a Section 4(f) resource, such that the impact qualifies as *de minimis* (see Section 3.2.1) or meets the criteria of an exception outlined in 23 CFR §774.13

**Figure 6. National Register Eligible or Treated as Eligible (Assumed Eligible) Properties within the Area of Potential Effects**

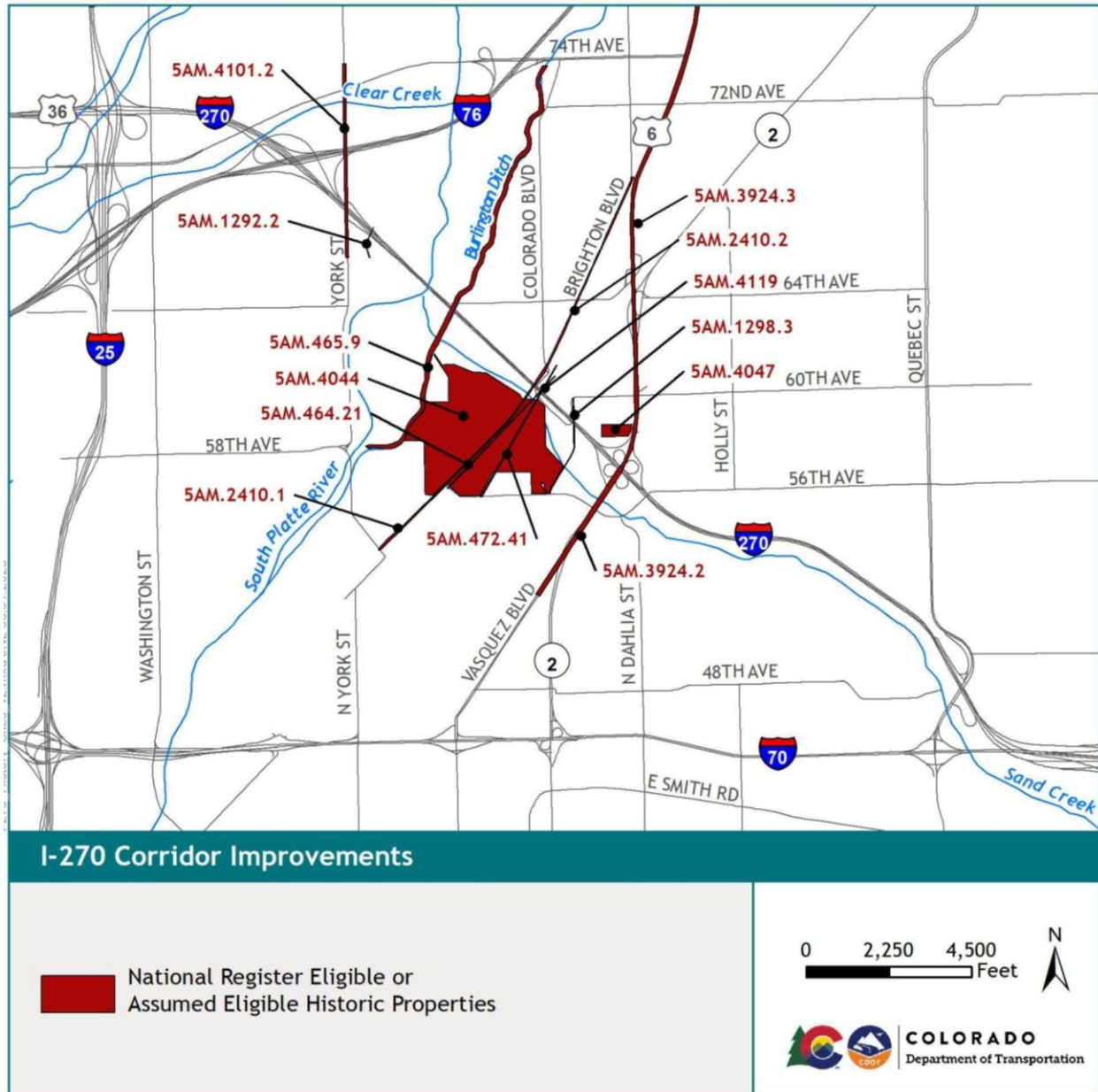


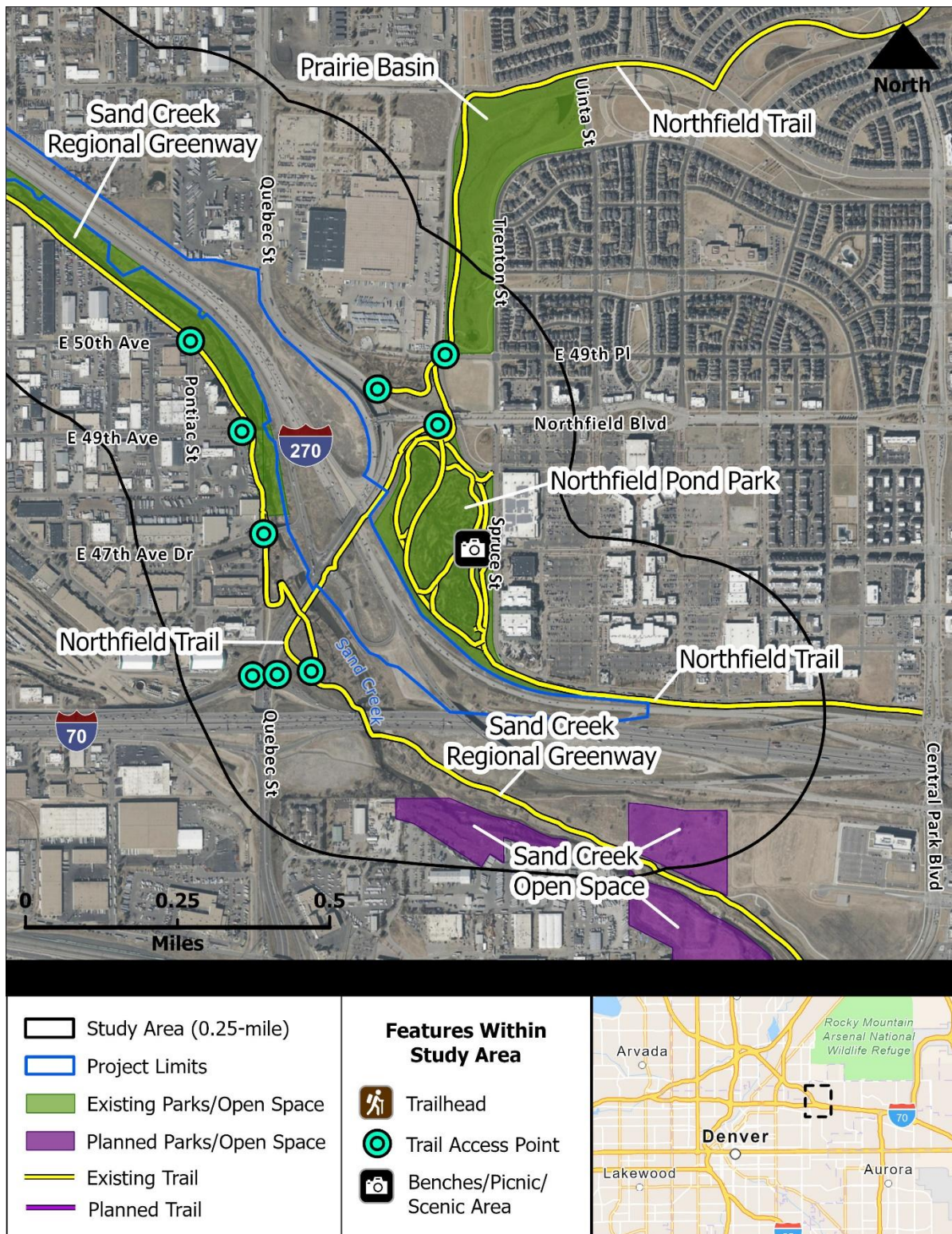
Figure 7. Existing and Planned Recreational Resources, West Section



Figure 8. Existing and Planned Recreational Resources, Central Section



Figure 9. Existing and Planned Recreational Resources, East Section



## 5.0 Existing Conditions

### 5.1 Historic Resources

#### 5.1.1 Historic Built Environment Resources

For CDOT's Section 106 evaluation of the I-270 EIS, CDOT identified 78 age-eligible properties within the APE. This includes:

- 70 previously recorded resources considered by the draft 2021 Environmental Assessment (for the remainder of this report, the two linear segments recorded for Vasquez Boulevard are not counted individually but are regarded as segments of a single resource, 5AM.3924, Vasquez Boulevard). Of these 70 resources, 59 were previously determined National Register not eligible, and 11 are eligible/treat as eligible.
- Three (3) bridges determined National Register not eligible under the 2014 Historic Bridge Inventory that were inadvertently omitted from the 2021 analysis (although these determinations are not reflected in History Colorado's Compass database of previously recorded sites).
- Five (5) properties within the APE, dating from 1976 to 1980, that were newly recorded and evaluated for National Register significance in 2024 (all five are not eligible).

In terms of these 78 potentially historic properties within the APE for the I-270 EIS, only 11 are National Register eligible/treat as eligible. Figure 6 shows the 11 eligible properties.

#### 5.1.2 Section 4(f) Applicability

Each historic property is described below and evaluated for Section 4(f) applicability. Table 1 at the end of this section summarizes the results. It should be noted that Suncor Energy was not surveyed due to its expansive size and was treated as eligible for Section 106 review purposes. For more information, refer to the *Historic Resources Technical Report*.

##### **Plastics, Inc. (5AM.4047)**

The property was constructed around 1947 as an industrial production shed by the Pepper Tank Company. Research uncovered from public records or historic newspapers did not reveal any of the companies associated with this parcel to have important associations with the industrial development or significant trends of Commerce City. Therefore, this property does not possess significance under Criterion A. Research did not uncover any associations with any significant persons. While Joseph E. Pepper, founder and owner of the Pepper Tank Company, was an industrious and successful businessman, there is no information to support his individual significance as an important person in the community. As such, the property is not eligible under Criterion B. The building is a representative, intact, and early example of a postwar concrete block and metal manufacturing production shed in Commerce City. The manufacturing production shed at 5701 Dexter Street retains all of the character-defining features of this property type and is one of a small pool of surviving postwar production sheds in Commerce City. The building at 5701 Dexter Street is less altered than most of the other surviving production sheds in Commerce City; it is the only one with a full exposed facade of original clerestory windows and one of only a couple without large modern additions. It is also

one of only two examples of this type in Commerce City that used concrete block. The building embodies the distinctive characteristics of a postwar manufacturing production shed and, as such, is determined eligible under Criterion C. The building is not likely to contain information important to history or prehistory beyond what is already documented and does not possess significance under Criterion D.

Changes over time include replacement windows and doors, as well as covering original steel sash clerestory windows, infilling a large garage bay with concrete block, and a shed-roof addition. These changes have somewhat affected the building's integrity of design and materials. However, the building retains sufficient integrity of location, setting, feeling, association, and workmanship to convey its significance as a postwar manufacturing production shed. These integrity concerns do not affect its ability to qualify for listing in the National Register of Historic Places under Criterion C.

#### **Section 4(f) Applicability**

Section 4(f) requirements apply to this National Register eligible historic property.

#### **Suncor Energy (5AM.4044)**

Suncor Energy represents the conglomeration of two historic oil refineries and is the only operating oil refinery remaining in Colorado. Together, these facilities spearheaded the industrial development of the Commerce City area in the mid-twentieth century. After incorporation as Commerce Town in 1952, the civic leaders actively promoted industrial development over residential development, resulting in the commercial and industrial corridor along I-270 and United States Highway 6 (US 6)/United States Highway 85 (US 85). As such, Suncor Energy is potentially eligible for listing in the National Register under Criterion A: Industry.

Research did not uncover any significant associations between this property and persons associated with industrial oil and gas development in Colorado under Criterion B.

The individual buildings at Suncor Energy were not surveyed and it is unknown if they possess any unique architectural features, although they generally appear to be utilitarian in nature and do not readily reflect a particular style, era, method of construction, or the work of a master. The cracking facilities appear to be composed of standard components and technology that are common to oil refineries. However, further research is needed to determine the presence or development of unique and innovative technologies, as well as the presence of older technologies that may convey significance related to petroleum refineries. Because a complete survey of the Suncor property was not possible at this time, it cannot be determined if the property possesses significance under Criterion C.

Suncor Energy is not likely to contain information important to history or prehistory beyond what is already documented and is therefore not eligible under Criterion D.

A complete assessment of physical integrity was not possible without access to Suncor Energy. However, aerial maps and photographs indicate that the property has changed significantly since its initial construction in 1930 and it is difficult to determine how many of the original buildings remain on the property. Although a more detailed assessment is required, the

property has operated as a refinery since its initial construction and appears to retain relatively good integrity of location, feeling, and association.

Alterations to the entire property over time raise concern regarding integrity of setting, design, workmanship, and materials. Because further research and survey is required to effectively determine National Register eligibility, Suncor Energy is determined as Needs Data.

#### **Section 4(f) Applicability**

Section 4(f) requirements apply to this historic property that is being treated as National Register eligible.

#### **Sand Creek (Railroad) Junction (5AM.4119)**

Sand Creek Junction is significant under Criterion A for its association with early railroad transportation in Colorado and twentieth century industrial development in Commerce City. It does not have association with significant persons under Criterion B, engineering significance under Criterion C, or significance for information potential under Criterion D. Sand Creek Junction retains integrity of setting, design, location, feeling, and association and is determined eligible to the National Register under Criterion A.

#### **Section 4(f) Applicability**

Section 4(f) requirements apply to this National Register eligible historic property.

#### **Chicago, Burlington & Quincy, Brush Railroad Line (5AM.464)**

A longer, previously recorded segment of Chicago, Burlington & Quincy railroad in this location (5AM.464.17) was previously determined Officially Eligible in 2007 under Criterion A. The Chicago, Burlington & Quincy is associated with early railroad development in Colorado. It provided the first direct connection between Denver and Chicago, as well as the farm towns on the Eastern Plains. It was therefore essential to Denver's development as an industrial metropolis and regional rail hub, as well as the development of small farming communities on the Eastern Plains. The Chicago, Burlington & Quincy Railroad does not have association with significant persons under Criterion B, engineering significance under Criterion C, or significance for information potential under Criterion D.

Segment 5AM.464.21 retains integrity of location, design, feeling, and association and supports the overall National Register eligibility of the Chicago, Burlington & Quincy railroad.

#### **Section 4(f) Applicability**

Section 4(f) requirements apply to this assumed National Register eligible historic property.

#### **Burlington Ditch/O'Brien Canal (5AM.465.9)**

Segment 5AM.465.9 was previously evaluated and officially determined to be supporting of the overall eligibility of the Burlington Ditch/O'Brien Canal in 2009. The Burlington Ditch/O'Brien Canal is significant under Criterion A for its association with early irrigation in northeast Colorado. The Burlington Ditch/O'Brien Canal does not have association with significant persons under Criterion B, engineering significance under Criterion C, or

significance for information potential under Criterion D. Due to the lack of major alterations, it is determined that this segment retain its previous determination of supporting the overall eligibility of the linear resource.

#### **Section 4(f) Applicability**

Section 4(f) requirements apply to this assumed National Register eligible historic property.

#### **Denver Pacific Railroad/Union Pacific Railroad Segment, Greeley Line (5AM.472.41)**

A longer, previously recorded segment of DP/UP railroad in this location (5AM.472.21) was previously determined Officially Eligible in 2013 under Criterion A. It was the first rail line to directly serve the Colorado Territory and the city of Denver. This line connected Denver by rail with the rest of the country via the transcontinental railroad. It is directly responsible for the growth of Denver's early industries as a regional hub for transportation, industry, and commerce. The DP/UP Railroad does not have association with significant persons under Criterion B, engineering significance under Criterion C, or significance for information potential under Criterion D. Segment 5AM.472.41 retains integrity of location, design, feeling, and association and supports the overall National Register eligibility of the UP railroad.

#### **Section 4(f) Applicability**

Section 4(f) requirements apply to this assumed National Register eligible historic property.

#### **Chicago, Burlington & Quincy/Burlington Northern Santa Fe, Market Street Line (5AM.1298.3)**

The Chicago, Burlington & Quincy/Burlington Northern Santa Fe Market Street Line (5AM.1298.1) was determined Officially Eligible in 2001 under Criterion A for its association with early commerce and industry in Denver. The Chicago, Burlington & Quincy Railroad does not have association with significant persons under Criterion B, engineering significance under Criterion C, or significance for information potential under Criterion D. Segment 5AM.1298.3 retains its original alignment and retains integrity of location, design, feeling, and association and supports the overall National Register eligibility of the Chicago, Burlington & Quincy/Burlington Northern Santa Fe Market Street Line.

#### **Section 4(f) Applicability**

Section 4(f) requirements apply to this assumed National Register eligible historic property.

#### **Brighton Boulevard/State Highway 265 (5AM.2410.1 and 5AM2410.2)**

Brighton Boulevard/State Highway 265 is significant under Criterion A as a farm-to-market road. State Highway 265 is a main transportation route from Brighton in Adams County, to Denver, providing an important artery for farms and ranches in the Brighton area to market shipping centers such as the Union Stockyards and rail shipping centers of the Union Pacific and Burlington Northern Railroads. Brighton Boulevard/State Highway 265 does not have association with significant persons under Criterion B, engineering significance under Criterion C, or significance for information potential under Criterion D. Segment 5AM.2410.2 retains integrity of location, design, feeling, and association and supports the overall National Register eligibility of State Highway 265 under Criterion A.

### Section 4(f) Applicability

Section 4(f) requirements apply to this assumed National Register eligible historic property.

#### Gardener's Ditch Segment (5AM.1292.2)

The Gardener's Ditch was determined Officially Eligible in 1999 for its association with early irrigation and agriculture in Denver under Criterion A. It does not have association with significant persons under Criterion B, engineering significance under Criterion C, or significance for information potential under Criterion D. Segment 5AM.1292.2 of Gardener's Ditch has been abandoned and does not retain sufficient integrity to support the overall eligibility of Gardener's Ditch. It does not support the overall National Register eligibility of the Gardener's Ditch.

### Section 4(f) Applicability

Section 4(f) requirements apply to this assumed National Register eligible historic property.

#### York Street (5AM.4101.2)

The entire length of York Street is assumed significant under Criterion A as a farm-to-market road. The road is not associated with persons of significance under Criterion B. The road's design and construction appear to fall within the established standard practices of road design and construction of the time and the road does not possess significance under Criterion C. The technology of road construction is well understood and documented and is unlikely to yield important information that cannot be discerned from archived plans and other records. Therefore, this road does not possess significance under Criterion D.

This segment of York Street does not retain historic integrity. This segment overall retains its original location and alignment. However, in response to changes in the surrounding area, it no longer conveys integrity of setting, feeling, or association with a twentieth-century farm-to-market road. Due to alterations to the street including widening and modernization, this segment no longer retains integrity of design, materials, or workmanship. It is determined non-supporting of the eligibility of the overall resource.

### Section 4(f) Applicability

Section 4(f) requirements apply to this assumed National Register eligible historic property.

#### Vasquez Boulevard, East 52nd Avenue to I-270 (5AM.3924.2)

Under Criterion A, the segment of the highway in northeastern Colorado possesses significance under Transportation as an early farm-to-market road that provided primary access for farmers, particularly in Phillips, Logan, Washington, and Morgan Counties, during the 1910s and 1920s at the local level. The western portion of US 6, from Clear Creek Canyon to Grand Junction and east of Denver near Wiggins, possesses significance under Criterion A in the area of Politics/Government at the state level. These segments have a direct association with work completed by the Works Progress/Projects Administration (WPA) from 1937 to 1941. The WPA is an important Depression-era, federal work-relief program and an important theme in state history. Vasquez Boulevard/US 6/US 85/SH 2 does not have association with significant persons under Criterion B, engineering significance under Criterion C, or significance for information potential under Criterion D.

Segment 5AM.3924.2 does not retain historic integrity and is a non-supporting segment. This segment overall retains its original location and alignment. However, in response to changes in the surrounding area, it no longer conveys integrity of setting, feeling, or association with a twentieth-century farm-to-market road. Due to alterations to the street including widening, modernization, and the construction of the cloverleaf interchange where the segment meets I-270, this segment no longer retains integrity of design, materials, or workmanship. It is determined non-supporting of the eligibility of the overall resource.

#### **Section 4(f) Applicability**

Section 4(f) requirements apply to this assumed National Register eligible historic property.

#### **Vasquez Boulevard (5AM.3924.3)**

Overall, US 6 (Vasquez Boulevard between I-270 and I-76) in Colorado possesses significance under Criterion A due to its role as an early farm-to-market road during the 1910s and 1920s at the local level. US 6 does not possess significance under Criterion B. Previous research did not indicate the use of innovative or important engineering design or construction techniques that would distinguish this highway from other roads, and it does not possess significance under Criterion C. The technology of road construction is well understood and documented and is unlikely to yield important information that cannot be discerned from archived plans and other records. Therefore, this road does not possess significance under Criterion D.

Segment 5AM.3924.3 does not retain historic integrity and is a non-supporting segment. A review of historic maps shows that alignment changes in Adams County and the Commerce City area have altered the route's ability to convey its integrity as a farm-to-market road and the rural setting of which it was once a part. The most impactful changes occurred sometime between 1957 and 1965, when the alignment of the segment changed. Another significant change around that period of time was the introduction of a cloverleaf interchange where the component encounters present-day I-270.

#### **Section 4(f) Applicability**

Section 4(f) requirements apply to this assumed National Register eligible historic property.

**Table 1. Eleven Eligible Properties Summary**

| Name                                              | Site Number | Eligibility        | Property Type                                             |
|---------------------------------------------------|-------------|--------------------|-----------------------------------------------------------|
| Plastics, Inc.                                    | 5AM.4047    | Eligible           | Architectural                                             |
| Suncor Energy                                     | 5AM.4044    | Treat as Eligible  | Industrial Complex                                        |
| Sand Creek (Railroad) Junction                    | 5AM.4119    | Eligible           | Linear resource                                           |
| Chicago, Burlington & Quincy, Brush Railroad Line | 5AM.464.21  | Eligible (Assumed) | Supporting of longer overall eligible linear resource     |
| Burlington Ditch                                  | 5AM.465.9   | Eligible (Assumed) | Supporting of longer overall eligible linear resource     |
| Denver Pacific Railroad, Greeley Line             | 5AM.472.41  | Eligible (Assumed) | Supporting of longer overall eligible linear resource     |
| Chicago, Burlington & Quincy, Market Street Line  | 5AM.1298.3  | Eligible (Assumed) | Supporting of longer overall eligible linear resource     |
| Brighton Boulevard                                | 5AM.2410.1  | Eligible (Assumed) | Supporting of longer overall eligible linear resource     |
|                                                   | 5AM.2410.2  |                    | Supporting of longer overall eligible linear resource     |
| Gardener's Ditch                                  | 5AM.1292.2  | Eligible (Assumed) | Non-supporting of longer overall eligible linear resource |
| York Street                                       | 5AM.4101.2  | Eligible (Assumed) | Non-supporting of longer overall eligible linear resource |
| Vasquez Boulevard                                 | 5AM.3924.2  | Eligible (Assumed) | Non-supporting of longer overall eligible linear resource |
|                                                   | 5AM.3924.3  |                    | Non-supporting of longer overall eligible linear resource |

### 5.1.3 Archaeological Resources

The archaeological assessment documented nine previous archaeological surveys conducted within the APE, and no previously documented archaeological sites within the APE. The assessment also documented extensive prior disturbance within the APE and identified no archaeological historic properties during the pedestrian inventory and exploratory testing of the few areas considered to have the potential for subsurface archaeological deposits. The CDOT Archaeologist conducted a subsequent desktop and field review of the APE and confirmed these findings.

## 5.2 Recreational Resources

### 5.2.1 Existing Trails and Trailheads

Existing and planned recreational resources are shown in Figure 7, Figure 8, and Figure 9. Each resource is described below and evaluated for Section 4(f) applicability. Table 2 at the

end of this section summarizes the results. For more information, refer to the *Recreational and Section 6(f) Resources Technical Report*.

#### 5.2.1.1 Clear Creek Trail

The Clear Creek Trail is 23 miles long and primarily hard surfaced, beginning in the City of Golden, and ending at its connection to the South Platte River Trail north of I-76 in Adams County. The trail runs parallel to Clear Creek and crosses under I-270 just east of Colorado State Highway 224. Adams County owns the portion of the trail within the study area, which averages 8 feet in width. The Adams County Colorado Open Space, Parks & Trails Master Plan (Adams County, 2022) identifies the Clear Creek Trail as a “very high priority” trail. While used by commuters, it is primarily a recreational trail, providing users access to adjacent natural areas and connections to other recreational resources (Adams County, 2022). Established operating hours for recreational facilities in Adams County are 5 a.m. to 11 p.m. which apply to the Clear Creek Trail (Adams County, 2020). There are no formal trailheads or accesses to the Clear Creek Trail within the study area.

##### Section 4(f) Applicability

The Clear Creek Trail is significant as a recreational trail, publicly owned, and open to the public. It is therefore subject to Section 4(f), requiring consultation with the Adams County Parks, Open Space & Cultural Arts Department as the OWJ for any proposed impacts.

#### 5.2.1.2 South Platte River Trail

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

##### Section 4(f) Applicability

The South Platte River Trail is significant as a recreational trail, publicly owned, and open to the public. It is therefore subject to Section 4(f) requiring consultation with the Adams County Parks, Open Space & Cultural Arts Department as the OWJ for any proposed impacts.

#### 5.2.1.3 Sand Creek Regional Greenway (“Sand Creek Trail”)

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

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

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

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

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

- East 64th Avenue near the proposed Burlington Ditch Connector Trail
- Brighton Boulevard
- East side of Wetland Park via pedestrian bridge
- East terminuses of East 47th Avenue Drive, East 49th Avenue, and East 50th Avenue
- Northbound and southbound Quebec Street
- Northfield Trail terminus southeast of the Quebec Street and I-270 interchange

#### **Section 4(f) Applicability**

The Sand Creek Trail is significant as a recreational trail, publicly owned, and open to the public. Therefore, it is subject to Section 4(f) and consultation with two OWJs is required for any proposed impacts. The SCRGP is an OWJ over the entire portion of the trail within the study area, and either the Commerce City Parks, Recreation, and Golf Department or the DPR Department is an OWJ depending on the jurisdiction in which impacts are proposed.

##### **5.2.1.4 Dahlia Trailhead (for the Sand Creek Trail)**

The Dahlia Trailhead is in Commerce City and accessible from South Sandcreek Drive just east of the intersection with East 56th Avenue and provides access to the Sand Creek Trail. The trailhead offers a paved parking area with marked vehicle spaces and a ramp down to the

trail. Events hosted by the SCRGP along the Sand Creek Greenway often utilize the trailhead for parking. Amenities within the trailhead include benches and bike racks. Commerce City owns the trailhead, and SCRGP maintains it. Established operating hours for recreational facilities in Commerce City are 5 a.m. to 11 p.m. which apply to the Dahlia Trailhead (Commerce City, n.d.).

#### **Section 4(f) Applicability**

The Dahlia Trailhead is publicly owned and open to the public. Additionally, it is a feature of the recreational Sand Creek Trail. Therefore, it is subject to Section 4(f), and consultation with both the Commerce City Parks, Recreation and Golf Department, and SCRGP is required for any proposed impacts.

#### **5.2.1.5 Wetland Park Trailhead (for Wetland Park)**

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

#### **Section 4(f) Applicability**

The Wetland Park Trailhead is publicly owned and open to the public. Additionally, it is a feature of the recreational Sand Creek Trail. Therefore, it is subject to Section 4(f) and consultation with both the Commerce City Parks, Recreation and Golf Department, and SCRGP is required for any proposed impacts.

#### **5.2.1.6 Wetland Park Loop Trail**

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

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

#### **Section 4(f) Applicability**

The Wetland Park Loop Trail is significant as a recreational trail, publicly owned, and open to the public. Therefore, it is subject to Section 4(f) and consultation with two OWJs is required for any proposed impacts.

### 5.2.1.7 Northfield Trail

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

#### Section 4(f) Applicability

The Northfield Trail is open to the public and traverses Denver-owned land. However, it is an off-street bikeway and not a significant recreational trail. Therefore, the Northfield Trail is not subject to Section 4(f).

## 5.2.2 Existing Parks and Open Space

### 5.2.2.1 Sand Creek Greenway

The Sand Creek Greenway constitutes approximately 153 acres of land within the study area, occurring adjacent to the Sand Creek Trail between the east side of the South Platte River and just north of East 49th Avenue. The greenway parallels I-270 and often occurs directly adjacent to interstate ROW. The entire portion of the Sand Creek Greenway within the study area is owned by Commerce City and maintained by the SCRGP.

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

#### Section 4(f) Applicability

Because the Sand Creek Greenway is designated as open space and not managed primarily for recreation, it is not subject to Section 4(f) (FHWA, 2012). However, the Sand Creek Trail and amenities along the trail are subject to Section 4(f).

### 5.2.2.2 Veterans Memorial Park and Eagle Pointe Recreation Center

The Veterans Memorial Park and Eagle Pointe Recreation Center property is northeast of the I-270/Vasquez Boulevard interchange between Parkway Drive and East 60th Avenue in Commerce City. The 2.6-acre park located on the property is open to the public and provides

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

#### **Section 4(f) Applicability**

Both Veterans Memorial Park and the Eagle Pointe Recreation Center are significant as recreational facilities, publicly owned, and open to the public. They are therefore subject to Section 4(f) and consultation with the Commerce City Parks, Recreation and Golf Department, as the OWJ would be required for any proposed impacts.

##### **5.2.2.3 Leyden Park**

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

#### **Section 4(f) Applicability**

Leyden Park is publicly owned, open to the public, and significant as a park. It is therefore subject to Section 4(f) requiring consultation with the Commerce City Parks, Recreation and Golf Department for any proposed impacts.

##### **5.2.2.4 Wetland Park**

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

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

However, there are features within the property that provide active recreation opportunities, including walking trails and picnic shelters. Established operating hours for recreational facilities in Commerce City are 5 a.m. to 11 p.m. which apply to Wetland Park (Commerce City, n.d.).

#### **Section 4(f) Applicability**

Because Wetland Park is designated as open space and managed for passive recreation, it is not subject to Section 4(f) (FHWA, 2012). However, the trails and picnic shelters within the park are subject to Section 4(f) and consultation with the Commerce City Parks, Recreation and Golf Department, and SCRGP, as OWJs would be required for any proposed impacts.

#### **5.2.2.5 Northfield Pond Park**

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

Denver's parks GIS database indicates that the property was formally designated as a park in 2017 (Denver, 2024). Established operating hours for recreational facilities in Denver are 5 a.m. to 11 p.m. which apply to Northfield Pond Park (Denver, 2022).

#### **Section 4(f) Applicability**

Northfield Pond Park is publicly owned, open to the public, and is formally designated as a park. For these reasons, the property is subject to Section 4(f) and consultation with DPR as the OWJ would be required for any proposed impacts.

#### **5.2.2.6 Prairie Basin**

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

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

### Section 4(f) Applicability

Prairie Basin is publicly owned and open to the public. There is not an official master plan indicating the primary use is non-recreation, and recreational amenities exist within the property. For these reasons, it is assumed to not be subject to Section 4(f).

## 5.2.3 Planned Recreational Resources

### 5.2.3.1 Burlington Ditch Connector

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

### Section 4(f) Applicability

Because the land under the planned Burlington Ditch Connector is currently not publicly owned, it is not subject to Section 4(f) (FHWA, 2012).

### 5.2.3.2 Sand Creek Greenway Open Space Parcels

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

### Section 4(f) Applicability

While the planned Sand Creek Greenway open space parcels are publicly owned, they are not currently designated for recreation and there is not a documented plan for construction. Therefore, they are not subject to Section 4(f).

**Table 2. Summary of Section 4(f) Applicability for Existing and Planned Recreational Resources**

| Resource Name                                                         | Official(s) With Jurisdiction                                                      | Section 4(f)?                                                                                                                                                                                           |
|-----------------------------------------------------------------------|------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Clear Creek Trail (Figure 6)                                          | Adams County Parks, Open Space & Cultural Arts                                     | Yes - The trail is publicly owned, open to the public, and significant as a recreational resource.                                                                                                      |
| South Platte River Trail (Figure 6)                                   | Adams County Parks, Open Space & Cultural Arts                                     | Yes - The trail is publicly owned, open to the public, and significant as a recreational resource.                                                                                                      |
| Sand Creek Trail (Figure 6, Figure 7, and Figure 8)                   | Commerce City Parks, Recreation and Golf; SCRGP; DPR                               | Yes - The trail is publicly owned, open to the public, and significant as a recreational resource.                                                                                                      |
| Dahlia Trailhead (Figure 7)                                           | Commerce City Parks, Recreation and Golf; SCRGP                                    | Yes - The trailhead is publicly owned, open to the public, and a feature of the recreational Sand Creek Trail.                                                                                          |
| Wetland Park Trailhead (Figure 7)                                     | Commerce City Parks, Recreation and Golf; SCRGP                                    | Yes - The trailhead is publicly owned, open to the public, and a feature of the Wetland Park Loop Trail.                                                                                                |
| Wetland Loop Trail (Figure 7)                                         | Commerce City Parks, Recreation and Golf; SCRGP                                    | Yes - The trail is publicly owned, open to the public, and a recreational amenity of Wetland Park.                                                                                                      |
| Northfield Trail (Figure 8)                                           | DPR                                                                                | No - The trail is an off-street bikeway and not a significant recreational trail.                                                                                                                       |
| Sand Creek Greenway (Figure 6, Figure 7, and Figure 8)                | Commerce City Parks, Recreation and Golf; SCRGP; DPR                               | No - The Greenway is designated as open space and not managed primarily for recreation.<br>Yes - Amenities (benches, picnic shelter, scenic view area) within the Greenway are subject to Section 4(f). |
| Veteran's Memorial Park and Eagle Pointe Recreation Center (Figure 7) | Commerce City Parks, Recreation and Golf                                           | Yes - The park is publicly owned, open to the public, and designated as a community park.                                                                                                               |
| Leyden Park (Figure 7)                                                | Commerce City Parks, Recreation and Golf                                           | Yes - The park is publicly owned, open to the public, and designated as a community park.                                                                                                               |
| Wetland Park (Figure 7)                                               | Commerce City Parks, Recreation and Golf; Sand Creek Regional Greenway Partnership | No - The property is designated as open space and not a recreational park.<br>Yes - Amenities (picnic shelters) within the park are subject to Section 4(f).                                            |
| Northfield Pond Park (Figure 8)                                       | DPR                                                                                | Yes - The park is publicly owned, open to the public, and designated as a park.                                                                                                                         |

| Resource Name                                                        | Official(s) With Jurisdiction | Section 4(f)?                                                                                                                                                                    |
|----------------------------------------------------------------------|-------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Prairie Basin (Figure 8)                                             | DPR                           | No - The property is designated as open space with passive recreation.                                                                                                           |
| Planned Resource - Burlington Ditch Connector (Figure 6)             | Commerce City                 | No - The land that the trail is proposed upon is privately owned, and there is currently no funding or timeline established for construction.                                    |
| Planned Resource - Sand Creek Greenway Open Space Parcels (Figure 8) | DPR                           | No - The parcels are proposed for future greenway development but are currently not designated as parkland, and there is no master plan or established timeline for development. |

## 6.0 Impacts Assessment

This section assesses impacts to Section 4(f) historic and recreational resources that would result from the No Action Alternative and the build alternatives and proposes mitigation as necessary. This section includes a determination of use and discussion of required and completed agency consultation.

### 6.1 No Action Alternative

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

### 6.2 Build Alternatives

#### 6.2.1 Historic Built Environment Resources

The effects discussion below focuses on the 11 National Register eligible properties within the APE for the I-270 EIS. Under both build alternatives, CDOT has made a “no adverse effect” finding for the 11 National Register eligible properties within the APE. The conceptual design information developed for the two build alternatives of the EIS identifies new permanent and/or temporary easements for 10 of the 11 “historic sites.” The only National Register eligible property within the APE that does not require a new transportation use is 5AM.4047, Plastics, Inc. Due to the “no adverse effect” determinations made under the Section 106 process and given the SHPO’s concurrence on those determinations, CDOT received a signed Section 4(f) *de minimis* from FHWA regarding the remaining 10 historic properties described on August 20, 2025 (Attachment D).

Brief summaries of the effects to the 11 National Register eligible properties and Section 4(f) findings are provided below. A summary of the Section 4(f) findings for the 11 National Register eligible properties identified is included in Table 3.

##### 6.2.1.1 Plastics, Inc. (5AM.4047) Effects

Ramp improvements at Vasquez Boulevard are proximal to Plastics, Inc., but introduces little change to the setting of this industrial property and does not require right-of-way or easements.

#### Section 4(f) Impact Determination

There is no new use of this property, therefore, there is no Section 4(f) impact.

##### 6.2.1.2 Suncor Energy (5AM.4044) Effects

A temporary easement of 0.27 acre is required from a vacant, previously disturbed area of 5AM.4044, Suncor Energy; a vast industrial complex on the south side of I-270 that is being treated as National Register eligible for purposes of this Section 106 review.

### **Section 4(f) Impact Determination**

The temporary easement for Suncor Energy is approximately 0.252 acre. FHWA can make a Section 4(f) temporary occupancy finding when it has been determined the temporary occupancies of land are so minimal as to not constitute a use within the meaning of Section 4(f) (see 23 CFR 774.13(d)). The following conditions must be satisfied:

- Duration must be temporary, i.e., less than the time needed for construction of the project and there should be no change in ownership of the land;
- Scope of the work must be minor, i.e., both the nature and the magnitude of the changes to the Section 4(f) property are minimal;
- There are no anticipated permanent adverse physical impacts, nor will there be interference with the protected activities, features, or attributes of the property, on either a temporary or permanent basis;
- The land being used must be fully restored, i.e., the property must be returned to a condition which is at least as good as that which existed prior to the project; and
- There must be documented agreement of the officials with jurisdiction over the Section 4(f) resource regarding the above conditions.

The work consists of minor improvements to a small section of Sand Creek Trail that is located on the Suncor property. These improvements would necessitate an easement of approximately 0.252 acre in size of the large 45.67-acre Suncor property. Overall project construction is expected to take approximately two years. Work on the Suncor property to improve the trail would be temporary and is not expected to last more than six months. The proposed improvements would consist of minor grading, realignment of the trail, barrier removal and installation of new barriers to separate users of the trail from the road, culvert construction, and pavement restoration on East 60th Avenue. The property would be fully restored and returned to a condition which is at least as good as that which existed before construction.

#### **6.2.1.3 Sand Creek (Railroad) Junction (5AM.4119) Effects**

This significant railroad resource will be affected by the replacement of a pair of I-270 bridges that span over it. A new four-span set of bridges will replace the existing four-span bridge pair that traverses the historic railroad junction. While the new bridge pair will be wider than the current pair, all new bridge piers are located outside of the historic boundaries of these resources and in several cases new bridge piers are further removed from the historic railroad resource boundaries than the current bridges. While temporary easements will be needed to implement the bridge replacements, no permanent effects to railroad alignments, ballast, or track are anticipated. One temporary easement is required from 5AM.4119 totaling 0.05 acre.

### **Section 4(f) Impact Determination**

Given the efforts undertaken by the I-270 EIS process to minimize impacts to historic properties and CDOT's No Adverse Effect determinations, FHWA may apply the Section 4(f) historic transportation facility exception.

#### 6.2.1.4 Chicago, Burlington & Quincy, Brush Railroad Line (5AM.464) Effects

This significant railroad resource will be affected by the replacement of a pair of I-270 bridges that span over it. A new four-span set of bridges will replace the existing four-span bridge pair that traverses the two supporting railroad segments and the historic railroad junction. While the new bridge pair will be wider than the current pair, all new bridge piers are located outside of the historic boundaries of these resources and in several cases new bridge piers are further removed from the historic railroad resource boundaries than the current bridges. While temporary easements will be needed to implement the bridge replacements, no permanent effects to railroad alignments, ballast, or track are anticipated. Three temporary easements are required from 5AM.464 totaling 0.15 acre.

#### Section 4(f) Impact Determination

Given the efforts undertaken by the I-270 EIS process to minimize impacts to historic properties and CDOT's No Adverse Effect determinations, FHWA may apply the Section 4(f) historic transportation facility exception.

#### 6.2.1.5 Burlington Ditch/O'Brien Canal (5AM.465.9) Effects

Replacement of the I-270 bridge pair over a supporting segment, 5AM.465.9, of the Burlington Ditch/O'Brien Canal will require temporary easements within the historic boundary of the Canal. Five separate temporary easements are required, totaling approximately 1.17 acres. One permanent easement of 0.01 acre is required. The two new bridges will be wider than the current bridge pair but will be single-span, instead of three-span as they are currently. All permanent vertical improvements, such as bridge piers, will be located outside of the canal's historically defined boundary. No permanent change to the ditch's alignment, earthen materials, or ditch rider roads are anticipated.

#### Section 4(f) Impact Determination

The temporary easement for Burlington Ditch/O'Brien Canal is approximately 0.15 acres. FHWA can make a Section 4(f) temporary occupancy finding when it has been determined the temporary occupancies of land are so minimal as to not constitute a use within the meaning of Section 4(f) (see 23 CFR 774.13(d)). The following conditions must be satisfied:

- Duration must be temporary, i.e., less than the time needed for construction of the project and there should be no change in ownership of the land;
- Scope of the work must be minor, i.e., both the nature and the magnitude of the changes to the Section 4(f) property are minimal;
- There are no anticipated permanent adverse physical impacts, nor will there be interference with the protected activities, features, or attributes of the property, on either a temporary or permanent basis;
- The land being used must be fully restored, i.e., the property must be returned to a condition which is at least as good as that which existed prior to the project; and
- There must be documented agreement of the officials with jurisdiction over the Section 4(f) resource regarding the above conditions.

A temporary construction easement for right-of-entry to the ditch access roads would be required to remove the existing bridges and build the new bridges. These improvements would necessitate an easement of approximately 0.18-acre on the west side of the ditch, and 0.17-acre feet on the east side of the ditch, for a total of 0.35 acres in size of the 35-acre ditch property. Overall project construction is expected to take approximately two years. Work in the vicinity of the ditch would be temporary and will last between nine and twelve months, depending on project phasing. The property would be fully restored and returned to a condition that is at least as good as that which existed before construction.

The removal of the existing bridges would be conducted with minimal disturbance to the ditch embankments and no disturbance to the Burlington Ditch channel. The existing bridge pier columns would be removed to 1 foot below the natural ground surface then buried in accordance with CDOT Standard Specs Section 202.08 so that the existing bridge columns would no longer be visible. The bottom portions of the existing bridge columns as well as the existing bridge foundations (consisting of pile caps with driven piles) would be buried following structure removal. The removal of the existing bridges would be conducted from the ditch access roads with minimal disturbance to the ditch embankments and no disturbance to the channel though a project special provision may be necessary to specify the specific requirements to protect the channel. The project specifications would include instructions for contractors that any additional changes or modifications to the ditch within the historic boundary would require SHPO consultation.

The removal of the existing bridge piers within the historic boundary would result in a direct effect to the ditch. Indirect effects would include placing the abutments for the two new bridges would be outside of the historic boundary. While there are changes to the setting of the historic ditch, the project would not change or alter the character-defining features of the ditch. The Burlington Ditch/O'Brien Canal has historically been crossed by several bridges and the current I-270 bridges have been in place since the 1960s. Replacing one set of non-historic bridges with another would not significantly impact the resource's integrity of setting, feeling, or association. Removal of the current piers may improve these aspects of integrity by removing a non-historic element from the historic boundary. There would be no change to the integrity of location, materials, design, or workmanship to the ditch. Because the historic integrity would not be significantly impacted, the ditch would still be able to convey its significance under Criterion A. As a result, the project would result in a No Adverse Effect determination to the Burlington Ditch/O'Brien Canal (5AM.465, which includes the supporting segment 5AM.465.9).

The findings of No Adverse Effect for these properties under Section 106 reflects CDOT's conclusion that the effects would not "alter, directly or indirectly, any of the characteristics of [the] historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association" as described in 36 CFR § 800.5(a)(1). Given the efforts undertaken by the I-270 EA to minimize impacts to historic properties and CDOT's No Adverse Effect findings for the Suncor Energy property and Burlington Ditch/O'Brien Canal, FHWA plans to make a temporary occupancy Section 4(f) finding for these properties.

#### **6.2.1.6 Denver Pacific Railroad/Union Pacific Railroad Segment, Greeley Line (5AM.472.41) Effects**

This significant railroad resource will be affected by the replacement of a pair of I-270 bridges that span over it. A new four-span set of bridges will replace the existing four-span bridge pair that traverses the two supporting railroad segments and the historic railroad junction. While the new bridge pair will be wider than the current pair, all new bridge piers are located outside of the historic boundaries of these resources and in several cases new bridge piers are further removed from the historic railroad resource boundaries than the current bridges. While temporary easements will be needed to implement the bridge replacements, no permanent effects to railroad alignments, ballast, or track are anticipated. Two temporary easements are required from 5AM.472 totaling 0.24 acre.

#### **Section 4(f) Impact Determination**

Given the efforts undertaken by the I-270 EIS process to minimize impacts to historic properties and CDOT's No Adverse Effect determinations, FHWA may apply the Section 4(f) historic transportation facility exception.

#### **6.2.1.7 Chicago, Burlington & Quincy/Burlington Northern Santa Fe, Market Street Line (5AM.1298.3) Effects**

Replacement of the bridge pair spanning over the Chicago, Burlington & Quincy/Burlington Northern Santa Fe - Market Street Line supporting segment, 5AM.1298.3, will result in a wider bridge over the rail line, but all new bridge piers are located at least 14 feet from (outside of) the historic rail line boundary. While a temporary easement of 0.32 acre will be needed to implement the bridge replacements, no permanent effects to railroad alignments, ballast, or track are anticipated.

#### **Section 4(f) Impact Determination**

Given the efforts undertaken by the I-270 EIS process to minimize impacts to historic properties and CDOT's No Adverse Effect determinations, FHWA may apply the Section 4(f) historic transportation facility exception.

#### **6.2.1.8 Brighton Boulevard/State Highway 265 (5AM.2410.1 and 5AM.2410.2) Effects**

Replacement of the bridge pair carrying I-270 over two supporting segments of Brighton Boulevard/CO-265, 5AM.2410.1 and 5AM.2410.2, will affect approximately 1.5 acres within the existing right of way of the historic roadway. These effects consist largely of rebuilding the curb and gutter on either side of the roadway under the new bridges, with no widening or other improvements on Brighton Boulevard anticipated. New bridge piers will be located outside of the historically defined boundary of Brighton Boulevard, although the new bridges crossing over Brighton Boulevard will be wider than the prior bridge pair.

## Section 4(f) Impact Determination

Given the efforts undertaken by the I-270 EIS process to minimize impacts to historic properties and CDOT's No Adverse Effect determinations, FHWA may apply the Section 4(f) historic transportation facility exception.

### 6.2.1.9 Gardener's Ditch Segment (5AM.1292.2) Effects

A non-supporting segment of the abandoned 5AM.1292.2, Gardener's Ditch, already crosses under I-270. Proposed improvements at I-270 and York Street will require two permanent easements of 0.01 acre each from this already heavily disturbed section of ditch on both the north and south sides of I-270, for a total of 0.02 acre of permanent easement.

## Section 4(f) Impact Determination

Consistent with Section 4(f) regulations [23 CFR 774.5(a)(ii)) and 774.7 (b)], FHWA can make a *de minimis* finding when a use of a historic property results in a No Adverse Effect determination under the Section 106 process. Widening of the I-270 mainline and storm sewer drainage improvements over the segment of the Gardener's Ditch (4AM.1292.2) may require removal of the current culvert, which is piped under I-270 (removal of approximately 1,600 square feet, or 345 feet by 4.52 feet of the segment, which totals 5,190 square feet). Additionally, a small temporary easement of 94 square feet is required on the south side of I-270 to realign the York Street Entrance Ramp to eastbound I-270 for a total impact of 1,694 square feet. The finding of No Adverse Effect to 5AM.1292, Gardener's Ditch, including segment 5AM.1292.2, reflect a conclusion that the effects would not "alter, directly or indirectly, any of the characteristics of [the] historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling or association as described in 36 CFR § 800.5(a)(1). Given the efforts undertaken by the I-270 EA to minimize impacts to historic properties and CDOT's No Adverse Effect finding for the Gardener Ditch, FHWA plans to make a *de minimis* finding for this property.

### 6.2.1.10 York Street (5AM.4101.2) Effects

Minor reconfiguration of the I-270 and York Street interchange and replacement of the York Street underpass at I-270 would permanently affect approximately 2.4 acres within the existing right of way of this non-supporting segment of York Street, 5AM.4101.2. The existing York Street underpass will be replaced with a wider underpass at the same location. Approximately 0.24-mile of sidewalk and curb and gutter will be added.

## Section 4(f) Impact Determination

Given the efforts undertaken by the I-270 EIS process to minimize impacts to historic properties and CDOT's No Adverse Effect determinations, FHWA may apply the Section 4(f) historic transportation facility exception.

**6.2.1.11 Vasquez Boulevard, East 52nd Avenue to I-270 (5AM.3924.2) Effects**

This non-supporting segment of Vasquez Boulevard/US 6 will be affected by interchange reconstruction at I-270 and Vasquez Boulevard, including conversion of the roadway from a full cloverleaf to partial cloverleaf, on-ramp and off-ramp reconstruction, addition of a new auxiliary lane on I-270 over Vasquez Boulevard, and replacement of a non-historic bridge on Vasquez Boulevard over Sand Creek. The improvements will permanently affect nearly 9 acres of the existing right of way of Vasquez Boulevard; however, the areas where improvements are anticipated already lack historic integrity due to prior interstate construction and other recent widening and bridge replacement improvements.

**Section 4(f) Impact Determination**

Given the efforts undertaken by the I-270 EIS process to minimize impacts to historic properties and CDOT's No Adverse Effect determinations, FHWA may apply the Section 4(f) historic transportation facility exception.

**6.2.1.12 Vasquez Boulevard (5AM.3924.3) Effects**

This non-supporting segment of Vasquez Boulevard/US 6 will be affected by interchange reconstruction at I-270 and Vasquez Boulevard, including conversion of the roadway from a full cloverleaf to partial cloverleaf, on-ramp and off-ramp reconstruction, addition of a new auxiliary lane on I-270 over Vasquez Boulevard, and replacement of a non-historic bridge on Vasquez Boulevard over Sand Creek. The improvements will permanently affect nearly 9 acres of the existing right of way of Vasquez Boulevard; however, the areas where improvements are anticipated already lack historic integrity due to prior interstate construction and other recent widening and bridge replacement improvements.

**Section 4(f) Impact Determination**

Given the efforts undertaken by the I-270 EIS process to minimize impacts to historic properties and CDOT's No Adverse Effect determinations, FHWA may apply the Section 4(f) historic transportation facility exception.

**Table 3. Section 4(f) Evaluations of Historic Built Environment Sites (National Register Eligible Historic Properties)**

| <b>OAHP<br/>Resource<br/>Number</b>    | <b>Resource Name</b>                                                                            | <b>No Action<br/>Alternative</b> | <b>Three General-Purpose Lanes<br/>Alternative</b>                                                                                                                                                     | <b>Two General-Purpose Lanes and One<br/>Express Lane that Accommodates<br/>Transit Alternative</b>                                                                                                    |
|----------------------------------------|-------------------------------------------------------------------------------------------------|----------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 5AM.464<br>-5AM.464.21                 | Chicago Burlington &<br>Quincy/Burlington<br>Norther Sante Fe<br>(CB&Q/BNSF)<br>Brush Line      | No New<br>Use/No<br>Section 4(f) | <i>de minimis</i> Section 4(f) Impact:<br>TE 4-04 (0.02 acre)<br>TE 4-05 (0.11 acre)<br>TE 4-08 (0.02 acre)                                                                                            | <i>de minimis</i> Section 4(f) Impact:<br>TE 4-04 (0.02 acre)<br>TE 4-05 (0.11 acre)<br>TE 4-08 (0.02 acre)                                                                                            |
| 5AM.465<br>-5AM.465.9                  | Burlington Ditch<br>Burlington Ditch/O'Brien<br>Canal                                           | No New<br>Use/No<br>Section 4(f) | <i>de minimis</i> Section 4(f) Impact:<br>PE 3-03 (0.01 acre)<br>TE 3-05 (0.07 acre)<br>TE 3-06 (0.10 acre)<br>TE 3-07 (0.03 acre)<br>TE 3-08 (0.87 acre)<br>TE 3-15 (0.10 acre)                       | <i>de minimis</i> Section 4(f) Impact:<br>PE 3-03 (0.01 acre)<br>TE 3-05 (0.07 acre)<br>TE 3-06 (0.10 acre)<br>TE 3-07 (0.03 acre)<br>TE 3-08 (0.87 acre)<br>TE 3-15 (0.10 acre)                       |
| 5AM.472<br>-5AM.472.41                 | Denver Pacific/Union<br>Pacific Railroad<br>Segment - Greeley Line                              | No New<br>Use/No<br>Section 4(f) | <i>de minimis</i> Section 4(f) Impact:<br>TE 4-04 (0.03 acre)<br>TE 4-05 (0.21 acre)                                                                                                                   | <i>de minimis</i> Section 4(f) Impact:<br>TE 4-04 (0.03 acre)<br>TE 4-05 (0.21 acre)                                                                                                                   |
| 5AM.1292<br>-5AM.1292.2                | Gardner Ditch - Gardener<br>Ditch - Heller Ditch<br>Gardener's Ditch<br>Segment                 | No New<br>Use/No<br>Section 4(f) | <i>de minimis</i> Section 4(f) Impact:<br>0.08 acre of new use of historic ditch<br>within existing I-270 right of way<br>RW 3-06 (up to 10 square feet)<br>PE 2-04 (0.01 acre)<br>PE 3-08 (0.01 acre) | <i>de minimis</i> Section 4(f) Impact:<br>0.08 acre of new use of historic ditch<br>within existing I-270 right of way<br>RW 3-06 (up to 10 square feet)<br>PE 2-04 (0.01 acre)<br>PE 3-08 (0.01 acre) |
| 5AM.1298<br>-5AM.1298.3                | Market Street Railroad<br>Market Street Railroad<br>Segment                                     | No New<br>Use/No<br>Section 4(f) | <i>de minimis</i> Section 4(f) Impact:<br>TE 5-09 (0.32 acre)                                                                                                                                          | <i>de minimis</i> Section 4(f) Impact:<br>TE 5-09 (0.32 acre)                                                                                                                                          |
| 5AM.2410<br>-5AM.2410.1<br>-5AM.2410.2 | Brighton Boulevard/CO-<br>265<br>Brighton Boulevard<br>Segment<br>Brighton Boulevard<br>Segment | No New<br>Use/No<br>Section 4(f) | <i>de minimis</i> Section 4(f) Impact:<br>1.5 acres of new use within historic<br>Brighton Boulevard boundary                                                                                          | <i>de minimis</i> Section 4(f) Impact:<br>1.5 acres of new use within historic<br>Brighton Boulevard boundary                                                                                          |

| OAHP Resource Number                   | Resource Name                                                                            | No Action Alternative      | Three General-Purpose Lanes Alternative                                                                                                                                       | Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative                                                                                          |
|----------------------------------------|------------------------------------------------------------------------------------------|----------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 5AM.3924<br>-5AM.3924.2<br>-5AM.3924.3 | Vasquez Boulevard/US Highway 6<br>Vasquez Boulevard segment<br>Vasquez Boulevard segment | No New Use/No Section 4(f) | <i>de minimis</i> Section 4(f) Impact:<br>8.82 acres of new use within historic boundary of Vasquez Boulevard - 4.84 acres within 5AM.3924.2 and 3.98 acres within 5AM.3924.3 | <i>de minimis</i> Section 4(f) Impact:<br>8.82 acres of new use within historic boundary of Vasquez Boulevard - 4.84 acres within 5AM.3924.2 and 3.98 acres within 5AM.3924.3 |
| 5AM.4044                               | Suncor Energy                                                                            | No New Use/No Section 4(f) | <i>de minimis</i> Section 4(f) Impact:<br>TE 4-09 (11,800 square feet or 0.27 acre)                                                                                           | <i>de minimis</i> Section 4(f) Impact:<br>TE 4-09 (11,800 square feet or 0.27 acre)                                                                                           |
| 5AM.4047                               | Plastics, Inc.                                                                           | No New Use/No Section 4(f) | Section 4(f) Impact:<br>None                                                                                                                                                  | Section 4(f) Impact:<br>None                                                                                                                                                  |
| 5AM.4101<br>-5AM.4101.2                | York Street<br>York Street segment                                                       | No New Use/No Section 4(f) | <i>de minimis</i> Section 4(f) Impact:<br>2.4 acres of new use within historic boundary of York Street                                                                        | <i>de minimis</i> Section 4(f) Impact:<br>2.4 acres of new use within historic boundary of York Street                                                                        |
| 5AM.4119                               | Sand Creek Junction                                                                      | No New Use/No Section 4(f) | <i>de minimis</i> Section 4(f) Impact:<br>TE 4-05 (0.05 acre)                                                                                                                 | <i>de minimis</i> Section 4(f) Impact:<br>TE 4-05 (0.05 acre)                                                                                                                 |

Key: TE - temporary construction easement; PE - permanent easement; RW - right-of-way

### 6.2.2 Archaeological Resources

The archaeological assessment of the APE identified no archaeological historic properties eligible for or listed on the National Register, CDOT determined a finding of “No Historic Properties Affected” was appropriate for the undertaking in June 2021; SHPO concurred with this finding in July 2021. In 2024, the CDOT Archaeologist conducted a subsequent review that confirmed this finding and the SHPO concurred with that finding on December 5, 2024.

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

### 6.2.3 Recreational Resources

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

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

Table 3 at the end of this section provides a summary of recreational impacts, and Section 4(f) use determinations for all resources identified.

Impacts to Section 4(f) property would be the same under the Three General-Purpose Lanes Alternative as under the Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative. Impacts would occur to three trails, including the South Platte River Trail, the Sand Creek Trail, and the Northfield Trail, as well as the Dahlia Trailhead. Additionally, impacts would occur to the Sand Creek Greenway open space which is not subject to Section 4(f). There is the potential for impacts to the Clear Creek Trail which is a Section 4(f) resource; however, impacts would be avoided with implementation of mitigation.

#### 6.2.3.1 Clear Creek Trail

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

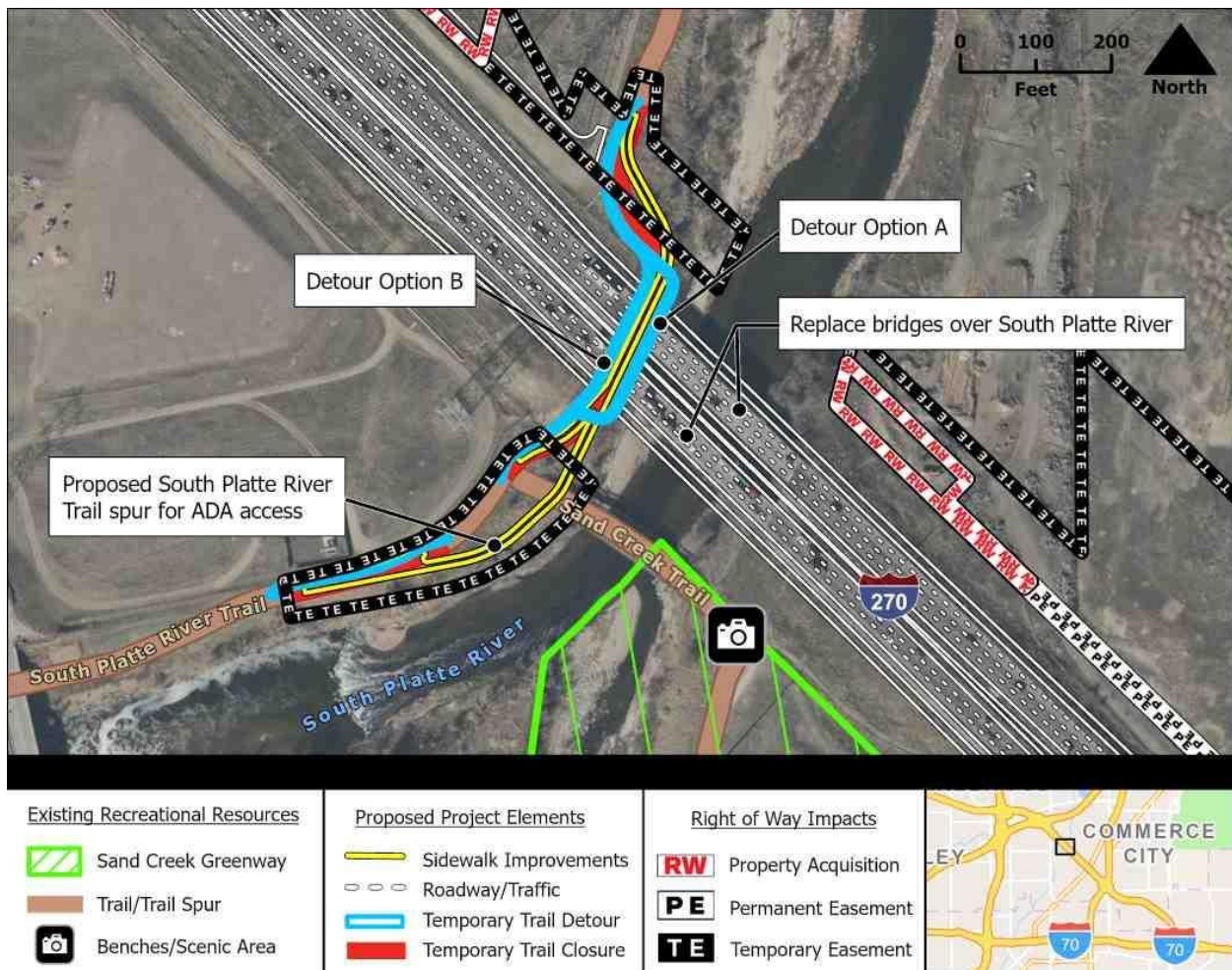
### 6.2.3.2 Section 4(f) Use of the Clear Creek Trail

Because no impacts would occur to the Clear Creek Trail, there would not be a Section 4(f) use.

### 6.2.3.3 South Platte River Trail

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

A temporary trail would be constructed to maintain access along the South Platte River Trail and several options exist for the temporary trail (Figure 10). Option A would detour trail users closer to the South Platte River, away from the bridge abutments and permanent trail realignment. Option B would detour trail users closer to the existing abutment by installing a temporary concrete barrier or shoring to protect pedestrians and bicyclists. Either temporary trail option would be constructed prior to beginning bridge girder installation, to ensure adequate vertical clearance is maintained between the temporary trail and the bottom of the new girders. Protective measures would be in place to protect trail users along the temporary trail from construction activities required to construct the new bridge and trail. Flaggers and signage would be utilized to manage bicyclists and pedestrians if the temporary trail cannot be constructed to the minimum standard width to accommodate both users. Additionally, flaggers would be utilized if construction activities, such as moving equipment across the trail, require a short closure (no more than 15 minutes) and management of trail traffic. Signage would be installed at strategic locations along and off the trail that would clearly communicate the expected construction timeline, closure and detour areas, and would be regularly maintained to ensure the information remains accurate and up to date. Strategic locations include access points, parking areas, trailheads, and points at which the trail enters and exits the project area.

**Figure 10. South Platte River Trail at I-270 Impacts**


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

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

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

#### 6.2.3.4 Section 4(f) Use of the South Platte River Trail

Impacts to South Platte River Trail described above satisfy the requirements for a Section 4(f) temporary occupancy exception (23 CFR 774.13[d]):

- Duration must be temporary, i.e., less than the time needed for construction of the project and there should be no change in ownership of the land;
- Scope of the work must be minor, i.e., both the nature and the magnitude of the changes to the Section 4(f) property are minimal;
- There are no anticipated permanent adverse physical impacts, nor will there be interference with the protected activities, features, or attributes of the property, on either a temporary or permanent basis;
- The land being used must be fully restored, i.e., the property must be returned to a condition which is at least as good as that which existed prior to the project; and
- There must be documented agreement of the officials with jurisdiction over the Section 4(f) resource regarding the above conditions

Adams County Parks, Open Space & Cultural Arts, the OWJ, concurred in writing with this determination on November 22, 2024. The Section 4(f) exception form and signed concurrence letter are included in Attachments A and B, respectively. Overnight closures occurring outside established operating hours are not a Section 4(f) use, because there would be no effect on the protected activities, features, or attributes.

#### 6.2.3.5 Sand Creek Trail and Greenway

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

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

#### 6.2.3.6 Sand Creek Trail and Greenway at Burlington Ditch

Sand Creek Trail: An underground pipe outfall is proposed to be installed directly east of the Burlington Ditch under the trail. The pipe outfall would extend from I-270 to Sand Creek, within the permanent easement footprint shown in Figure 11. Approximately 100 feet of the Sand Creek Trail is within proposed temporary and permanent easements needed for construction and future maintenance of the outfall (Figure 11). The work would be completed in a manner that would allow trail continuity to be maintained within the established operating hours of 5 a.m. to 11 p.m. Additionally, flaggers would be utilized if construction

activities, such as moving equipment across the trail, require a short closure (no more than 15 minutes) and management of trail traffic.

**Sand Creek Greenway:** Directly west of the Burlington Ditch, an area of the Greenway approximately 1 acre in size would be used for construction staging, requiring acquisition of a temporary easement (Figure 12). Directly east of the Burlington Ditch, an underground pipe outfall from I-270 to Sand Creek would be installed, requiring a permanent easement of approximately 1 acre for future access and maintenance (Figure 11). Additionally, temporary easements from the greenway would be required to accommodate installation, totaling approximately 0.30 acres. All disturbed areas of the Greenway would be restored following construction of the project.

**Figure 11. Sand Creek Trail and Greenway Impact, East of Burlington Ditch**

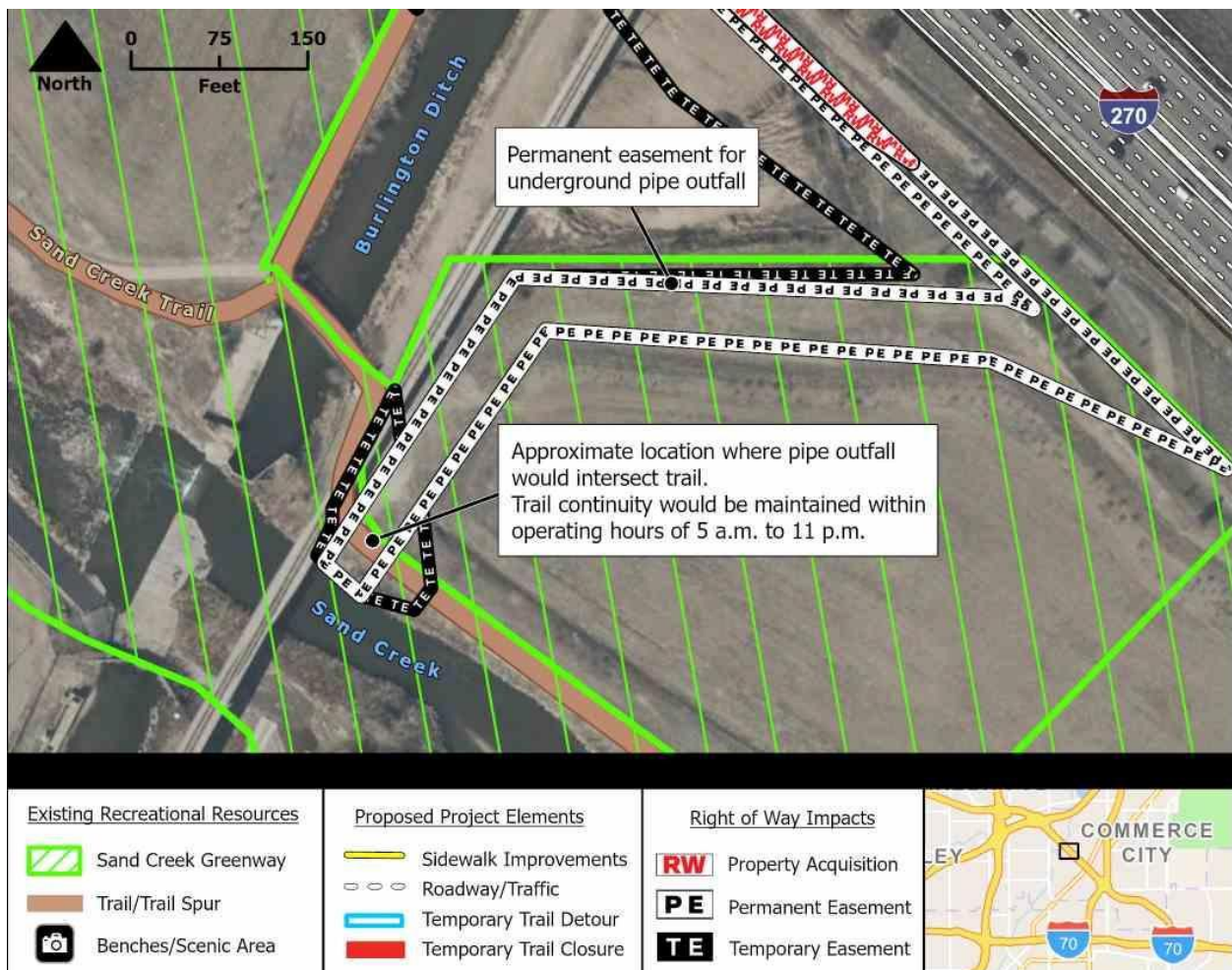


Figure 12. Sand Creek Trail and Greenway Impacts, West of Burlington Ditch



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

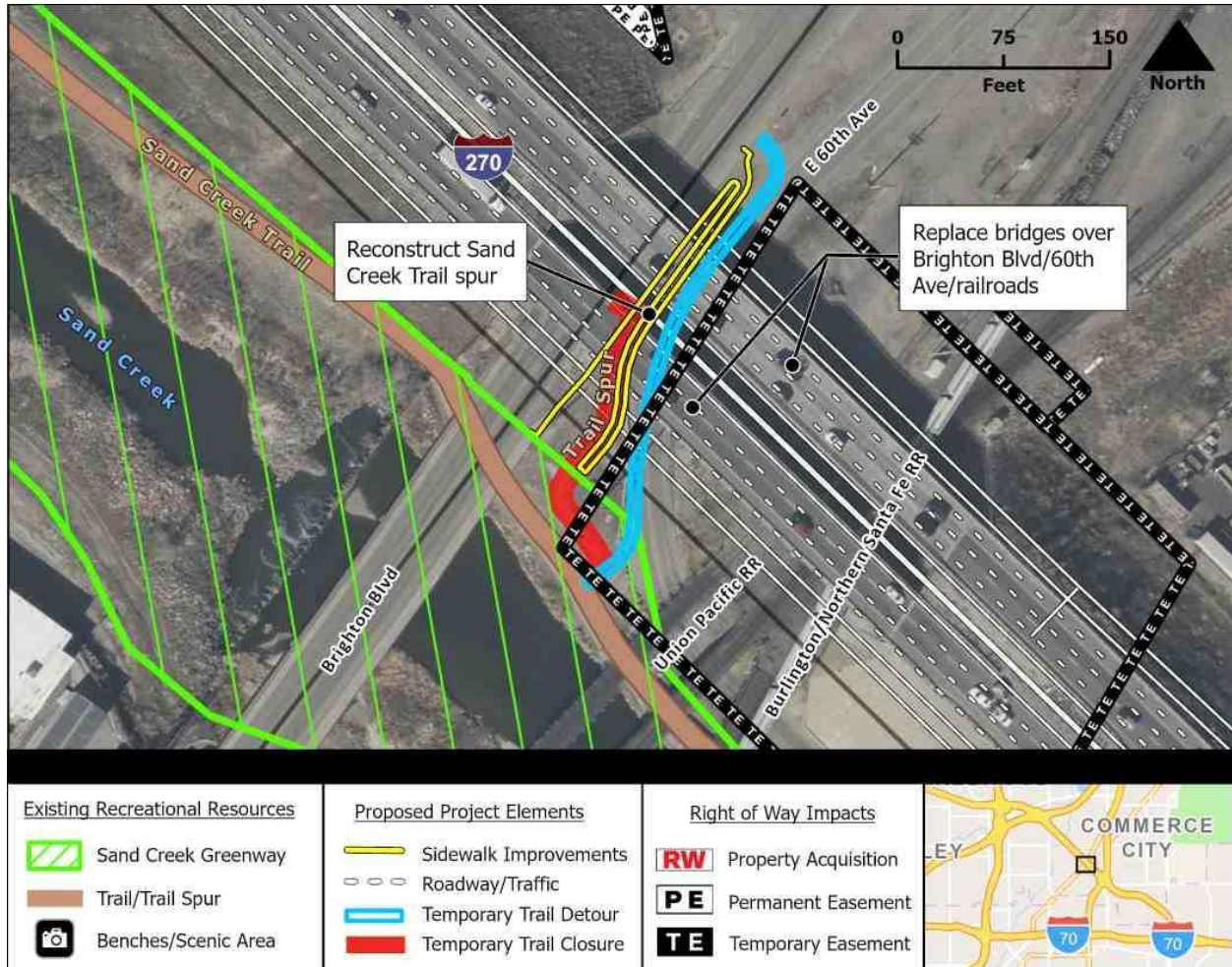
Sand Creek Trail: A spur trail providing a connection to the Sand Creek Trail from Brighton Boulevard would be temporarily closed during replacement of the I-270 bridges that span over Brighton Boulevard, East 60th Avenue, and the Union Pacific and Burlington/Northern Santa Fe Railroads (Figure 13). The spur trail is in close proximity to existing bridge piers to be removed and reconstructed, creating a need to close the trail temporarily during bridge construction. Additional work requiring the temporary spur trail closure includes reconstruction of an existing retaining wall along the west side of the spur trail to accommodate the new bridge pier locations. The spur trail would be reconstructed and its connection to Brighton Boulevard would be improved as part of the project.

East 60th Avenue is further away from existing piers than the spur trail which provides a safe and feasible location for a trail detour. Therefore, to maintain access from Brighton Boulevard to the Sand Creek Trail, a temporary trail would be constructed to detour trail users onto East 60th Avenue by installing a temporary concrete barrier to protect pedestrians and bicyclists, installing temporary pavement on the east side of East 60th Avenue, and shifting vehicle traffic onto the temporary pavement to accommodate vehicle traffic. In

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

**Sand Creek Greenway:** A temporary easement totaling approximately 0.07 acres would be needed from the Greenway to reconstruct the tie in of the spur trail to the Sand Creek Trail (Figure 13). All disturbed areas of the Greenway would be restored following construction of the project.

**Figure 13. Spur to Sand Creek Trail Impacts at Brighton Boulevard/East 60th Avenue**



### 6.2.3.8 Sand Creek Trail and Greenway at Vasquez Boulevard

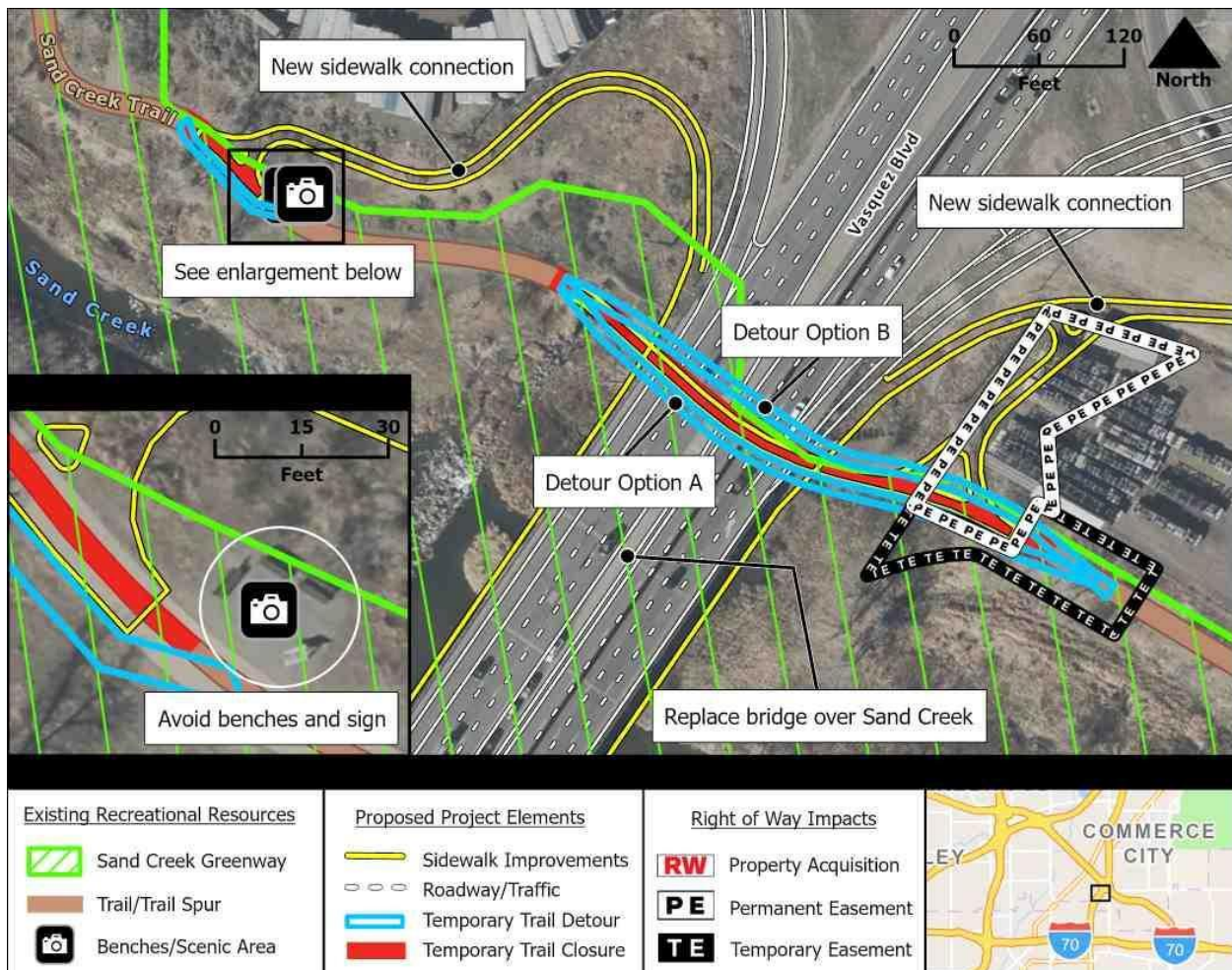
Sand Creek Trail: Approximately 470 feet of the trail approaching and crossing under Vasquez Boulevard would be temporarily closed to accommodate the replacement of the Vasquez Boulevard bridge over Sand Creek and installation of new, 10-foot-wide sidewalk connections between Sand Creek Trail and the east and west sides of Vasquez Boulevard (Figure 14). The west sidewalk connection would be constructed within transportation ROW; however, the east sidewalk connection requires a temporary easement for construction and permanent easement for maintenance of the new sidewalk. Approximately 60 feet of the Sand Creek Trail is within the proposed permanent easement where the new sidewalk connection would tie into the trail.

- Temporary trails would be constructed to maintain access along the Sand Creek Trail. Figure 14 shows two options for temporary trail alignments under the Vasquez Boulevard bridge. Option A would detour trail users closer to Sand Creek, away from the bridge abutments and Option B would detour trail users closer to the existing abutment by installing a temporary concrete barrier or shoring to protect pedestrians and bicyclists. Either temporary trail option would be constructed prior to beginning bridge girder installation to ensure adequate vertical clearance is maintained between the temporary trail and the bottom of the new girders. Protective measures would be in place to protect trail users along the temporary trail from construction activities required to construct the new bridge and trail. Flaggers and signage would be utilized to manage bicyclists and pedestrians if the temporary trail cannot be constructed to the minimum standard width to accommodate both users. Additionally, flaggers would be utilized if construction activities, such as moving equipment across the trail, require a short closure (no more than 15 minutes) and management of trail traffic.
- Several overnight closures of the temporary trail under the Vasquez Boulevard bridge would be required to accommodate placement of the bridge girders, and trail users would not be able to travel under Vasquez Boulevard during these times for safety reasons. These overnight closures would occur outside established trail operating hours of 5 a.m. to 11 p.m., and full access along the temporary trail would be restored during established operating hours. The OWJs and the public would be notified at least two weeks prior to overnight closures. During overnight closures, signage would be placed at the nearest trail access points to inform users. This signage would be removed when construction activities allow safe use of the trail, and no later than 5 a.m. daily.
- The trail would be restored in the original alignment and reopened following construction at this location.

Sand Creek Greenway: The Greenway would be temporarily disturbed to construct temporary detour trails for the Sand Creek Trail. Additionally, a temporary easement of approximately 0.40 acres and a permanent easement of approximately 0.20 acres would be acquired from the Greenway adjacent to the new sidewalk connection from the east side of Vasquez Boulevard (Figure 14). All disturbed areas of the Greenway would be restored following construction of the project.

- The benches and sign located within the Sand Creek Greenway approximately 300 feet west of Vasquez Boulevard would not be impacted by the proposed new sidewalk connection and would not be disturbed by construction activities (Figure 14).

Figure 14. Sand Creek Trail and Greenway Impacts at Vasquez Boulevard



### 6.2.3.9 Sand Creek Trail and Greenway at Dahlia Trailhead

**Sand Creek Trail:** An approximately 400-foot-long segment of the trail would be temporarily closed adjacent to the Dahlia Trailhead to accommodate realigning the trail (Figure 15). A temporary easement is needed to construct these improvements, and approximately 280 feet of the trail is within the proposed easement. The trail realignment would address an existing blind curve along the trail which creates a safety issue.

- A temporary trail would be constructed that would maintain access from the Dahlia Trailhead parking area to the trail and detour users around the construction area (Figure 15). The trail would be reopened following construction at this location.

**Sand Creek Greenway:** A sidewalk would be constructed along the east side of East 56th Avenue and south side of South Sandcreek Drive, with sidewalk connections into the Dahlia Trailhead parking area as well as the entrance to the trailhead. A permanent easement of 0.06 acres would be acquired from the Greenway for construction and maintenance of the sidewalk. Additionally, the Greenway would be temporarily disturbed to construct a temporary detour trail for the Sand Creek Trail. A temporary easement of 1.15 acres would be

acquired from the Greenway, encompassing the Dahlia Trailhead, for construction access. All disturbed areas of the Greenway would be restored following construction of the project.

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

Figure 15. Sand Creek Trail and Greenway Impacts at Dahlia Trailhead

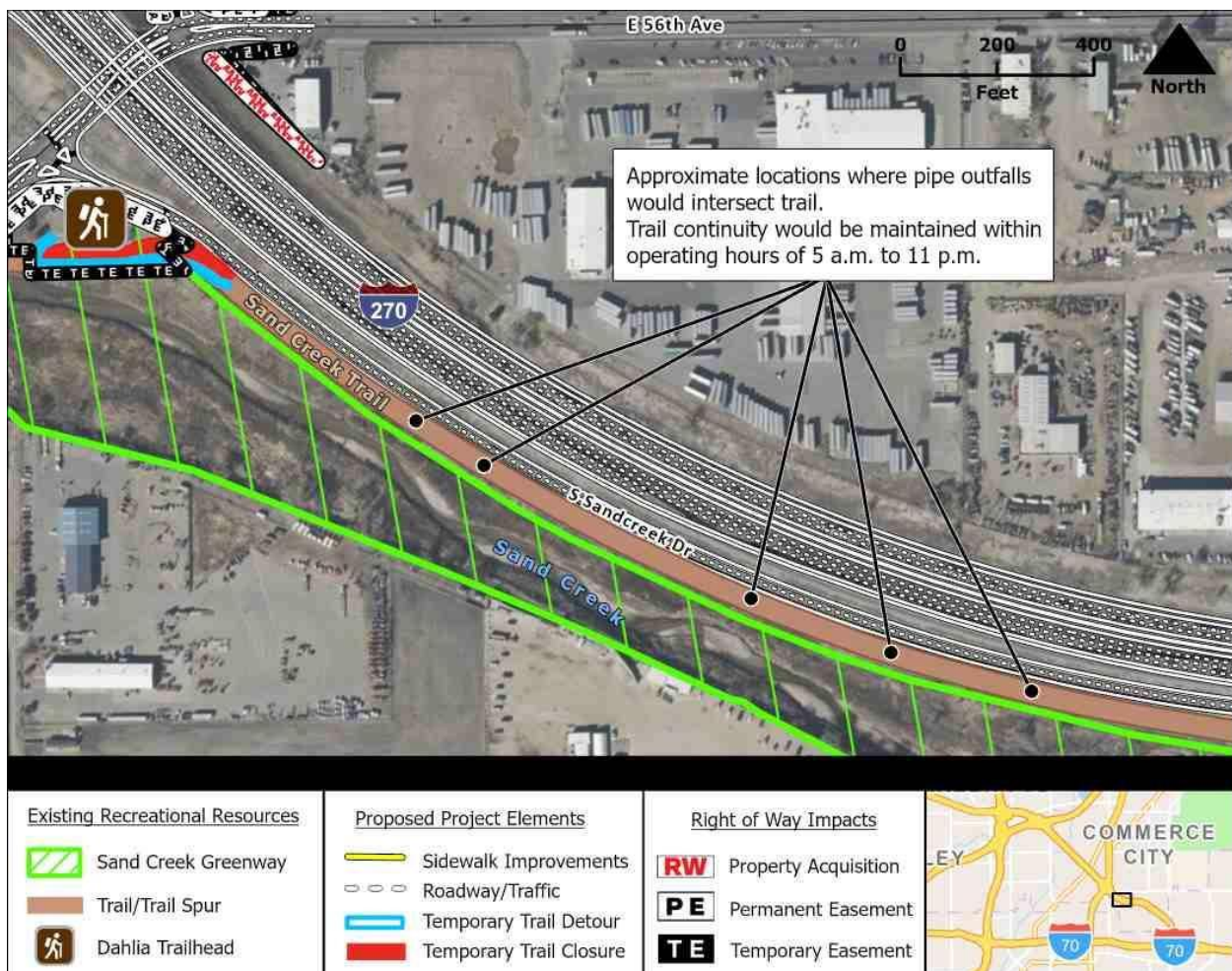


### 6.2.3.10 Sand Creek Trail and Greenway between East 56th Avenue and Krameria Street:

**Sand Creek Trail:** Underground pipe outfalls extending between I-270 and the Sand Creek Trail would be installed under the Sand Creek Trail at eight locations between approximately 900 feet east of East 56th Avenue to Krameria Street (Figure 16 and Figure 17). This work would occur completely within CDOT ROW and would be completed in a manner that would allow trail continuity to be maintained within the established operating hours of 5 a.m. to 11 p.m. Additionally, flaggers would be utilized if construction activities, such as moving equipment across the trail, require a short closure (no more than 15 minutes) and management of trail traffic.

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

**Figure 16. Sand Creek Trail and Greenway Impacts between East 56th Avenue and Krameria Street**



#### 6.2.3.11 Sand Creek Trail and Greenway at East 53rd Way:

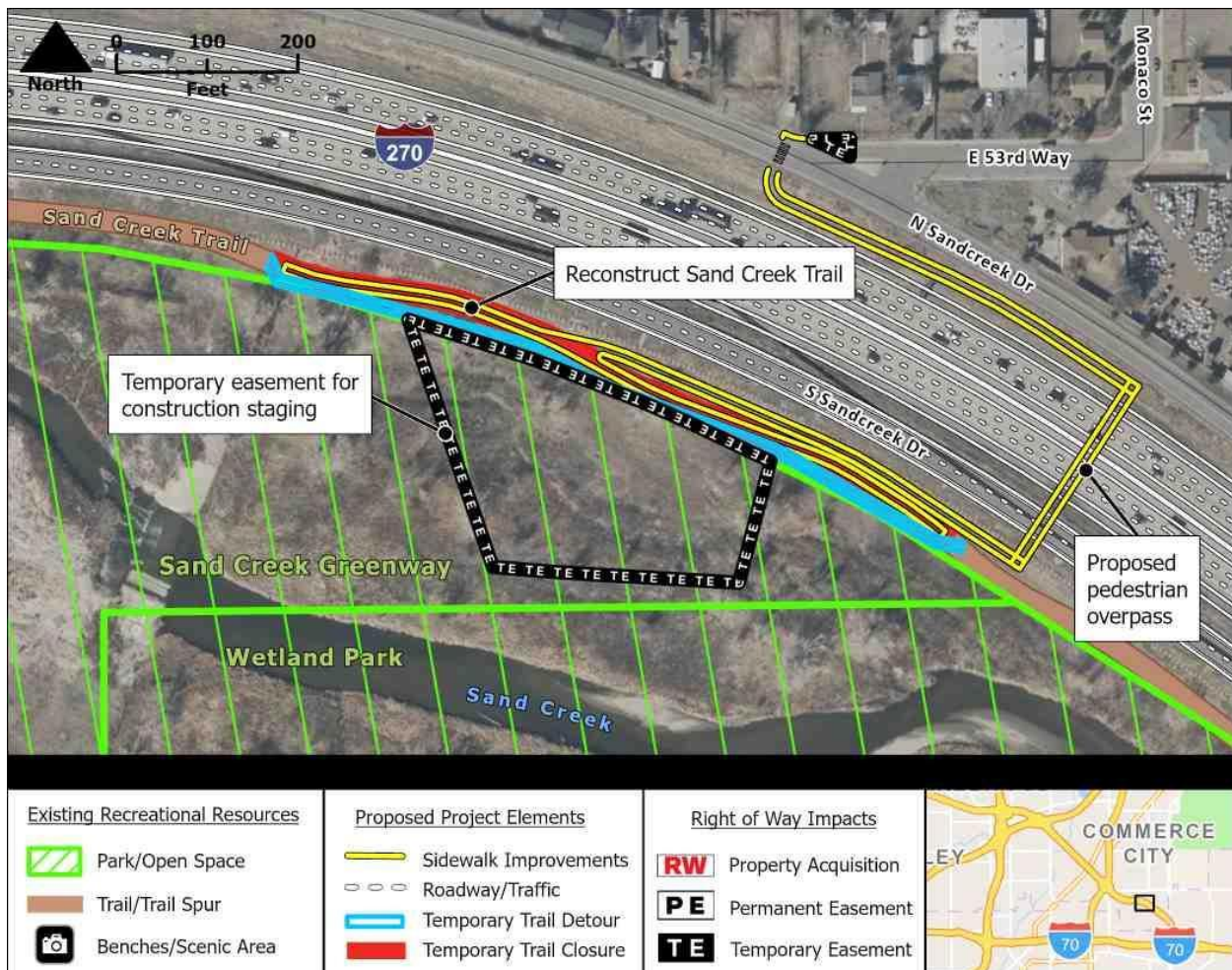
Sand Creek Trail: A pedestrian overpass is being proposed that would connect with the Sand Creek Trail south of I-270, cross over South Sand Creek Drive and I-270, and connect with North Sand Creek Drive at East 53rd Way north of I-270 (Figure 18). An approximately 800-foot-long segment of the Sand Creek Trail would be closed during installation of the pedestrian overpass and for reconstruction of the trail.

- A temporary trail would be constructed to detour trail users around the construction area and maintain access along the Sand Creek Trail (Figure 18). The trail would be reopened following reconstruction of the trail and construction of the pedestrian bridge.

Sand Creek Greenway: The Greenway would be temporarily disturbed to construct the temporary detour trail for the Sand Creek Trail. Additionally, a temporary easement of approximately 1.50 acres would be acquired from the Greenway for temporary construction staging. All disturbed areas of the Greenway would be restored following construction of the project.

- Signage would be installed at strategic locations along and off the trail that would clearly communicate the expected construction timeline, closure and detour areas, and would be regularly maintained to ensure the information remains accurate and up to date. Strategic locations include access points, parking areas, trailheads, and points at which the trail enters and exits the project area.
- Commerce City's trail specifications will be incorporated into the design for the replacement of all impacted segments of the Sand Creek Trail.

Figure 17. Sand Creek Trail and Greenway Impacts at East 53rd Way



### Section 4(f) Use of the Sand Creek Trail

FHWA is considering a *de minimis* impact finding for impacts to the Sand Creek Trail. A *de minimis* impact is one that, after taking into account all minimization, mitigation, and enhancement measures, will not adversely affect the features, attributes, or activities qualifying the property for protection under Section 4(f) (23 CFR 774.17). Segments proposed to be temporarily impacted, and areas of potential permanent easements are relatively small compared to the overall length of the facility, and continuity would be maintained for users of the trail. All disturbed areas of the trail would be restored to preconstruction conditions. Therefore, impacts to the trail would not be adverse temporarily or permanently. Overnight closures of the trail occurring outside established operating hours are not considered to be a Section 4(f) use because there would be no effect on the protected activities, features, or attributes.

The OWJs, Commerce City, and the SCRGP have been informed of the intent to make a *de minimis* impact finding (Attachment B). Public review and comment will be solicited through the EIS public comment and public hearing process in accordance with 23 CFR 774.5(b)(2). Following the comment period, comments will be considered and the intent to make a *de minimis* impact finding will be reassessed. If it is still the intent, the OWJs will be requested

to provide written concurrence agreeing with the *de minimis* impact finding. Following this process, FHWA may make a final determination on the *de minimis* impact finding.

#### 6.2.3.12 Dahlia Trailhead

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

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

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

#### Section 4(f) Use of the Dahlia Trailhead

FHWA is considering a *de minimis* impact finding for impacts to the Dahlia Trailhead. A *de minimis* impact is one that, after taking into account all minimization, mitigation, and enhancement measures, will not adversely affect the features, attributes, or activities qualifying the property for protection under Section 4(f) (23 CFR 774.17). While up to 75 percent of the existing Dahlia Trailhead parking spaces may need to be utilized for construction access, the trailhead would remain open during construction and access down to the Sand Creek Trail would be maintained. Additional parking spaces would be freed up for public use as construction activities allow. Early coordination with the OWJs ahead of trailhead occupancy would ensure all parking spaces are available when necessary for events. Proposed new sidewalk connections between the roadway and trailhead constitute an improvement for safety and to meet current design standards, and all other disturbed areas would be restored to preconstruction conditions. Therefore, impacts to the trailhead would not be adverse on either a temporary or permanent basis.

The OWJs, Commerce City, and the SCGRP have been informed of the intent to make a *de minimis* impact finding (Attachment B). Public review and comment will be solicited through the EIS public comment and public hearing process in accordance with 23 CFR 774.5(b)(2). Following the comment period, comments will be considered and the intent to make a *de minimis* impact finding will be reassessed. If it is still the intent, the OWJs will be requested to provide written concurrence agreeing with the *de minimis* impact finding. Following this process, FHWA may make a final determination on the *de minimis* impact finding.

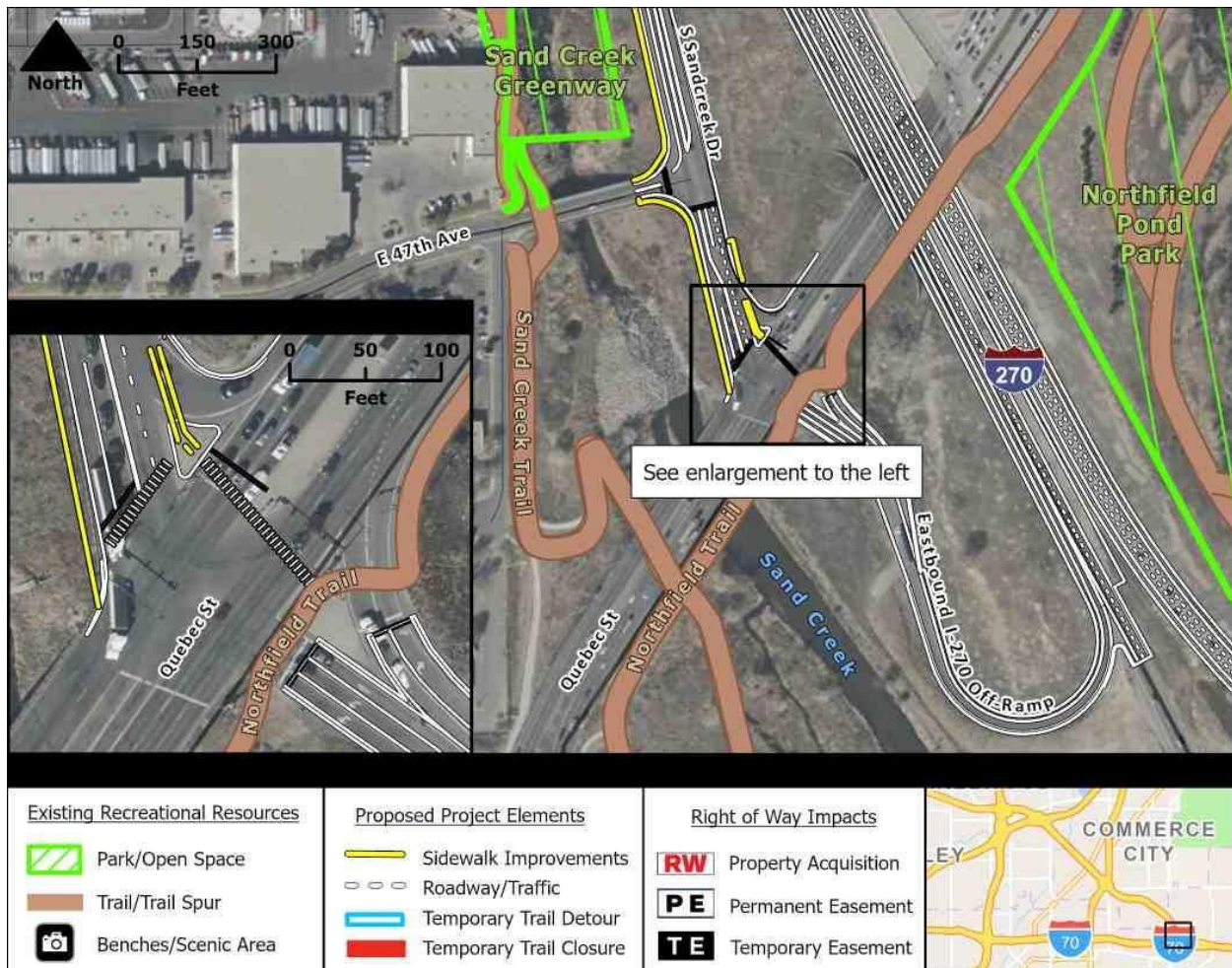
### 6.2.3.13 Northfield Trail

The Northfield Trail traverses the east side of Quebec Street. The existing trail may be temporarily disturbed to construct new curb and gutter at the I-270 eastbound off-ramp (Figure 19). Continuity of the Northfield Trail would be maintained at all times using signs and flaggers to manage traffic along the trail. Any disturbances to the trail would be restored following construction at this location.

### Section 4(f) Use of the Northfield Trail

As discussed previously, the Northfield Trail is not subject to Section 4(f), so there is no use.

**Figure 18. Northfield Trail Impacts at I-270 and Quebec Street**



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

| Resource Name                                              | Recreational Impact?           | Section 4(f) Use?                   |
|------------------------------------------------------------|--------------------------------|-------------------------------------|
| Clear Creek Trail                                          | No - Outside of project limits | No - Outside of project limits      |
| South Platte River Trail                                   | Yes                            | Yes - temporary occupancy exception |
| Sand Creek Trail                                           | Yes                            | Yes - <i>de minimis</i>             |
| Dahlia Trailhead                                           | Yes                            | Yes - <i>de minimis</i>             |
| Wetland Park Trailhead                                     | No - Outside of project limits | No - Outside of project limits      |
| Wetland Loop Trail                                         | No - Outside of project limits | No - Outside of project limits      |
| Northfield Trail                                           | Yes                            | N/A - Not Section 4(f)              |
| Sand Creek Greenway                                        | Yes                            | N/A - Not Section 4(f)              |
| Veteran's Memorial Park and Eagle Pointe Recreation Center | No - Outside of project limits | No - Outside of project limits      |
| Leyden Park                                                | No - Outside of project limits | No - Outside of project limits      |
| Wetland Park                                               | No - Outside of project limits | N/A - Not Section 4(f)              |
| Northfield Pond Park                                       | No - Outside of project limits | No - Outside of project limits      |
| Prairie Basin                                              | No - Outside of project limits | No - Outside of project limits      |

## 7.0 Mitigation Measures

Based on conceptual designs developed for the two EIS build alternatives, CDOT has made a finding of “no adverse effect” for the 11 identified National Register eligible properties under the Section 106 process. CDOT will need to reassess individual project designs as they move forward under the EIS to ensure that the effects to these historic properties have not increased, and that these designs are not causing new effects to historic properties. Given that the EIS improvements will result in no adverse effect to historic properties under the Section 106 process, CDOT has not identified any mitigation required for historic resources.

Table 4 shows a summary of recreational Section 4(f) impacts and mitigations for the build alternatives.

**Table 4. Summary of Recreational Section 4(f) Impacts and Mitigation for Build Alternatives**

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

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

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

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

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

## 8.0 Required Permits and Coordination

### 8.1 Historic Resources

There are also no permits required for compliance with Section 4(f) for historic properties.

Design changes during final design will need to be reviewed to determine if Section 106 effects have changed, and additional consultation with the SHPO is necessary. In addition, as individual construction phases of work move forward, additional evaluations will be needed to determine if effects to historic properties have changed, and whether additional Section 106 coordination and Section 4(f) evaluations are required.

### 8.2 Recreational Resources

There are no permits required for recreational Section 4(f) property. Table 5 shows the consultation that will be required for Section 4(f) approval and is anticipated to be completed prior to the ROD.

**Table 5. Required Permits and Coordination by Agency and Project Phase**

| Agency                      | Permit/Coordination                                                   | Phase |
|-----------------------------|-----------------------------------------------------------------------|-------|
| Commerce City and the SCRGP | Section 4(f) consultation with OWJs for <i>de minimis</i> concurrence | NEPA  |

## 9.0 References

Adams County. 2017. Adams County Clear Creek Corridor Master Plan.

[https://www.adcogov.org/sites/default/files/2018\\_ADCO\\_CCCMP\\_FINAL\\_FOR%20ADOPTION.pdf](https://www.adcogov.org/sites/default/files/2018_ADCO_CCCMP_FINAL_FOR%20ADOPTION.pdf)

Adams County. 2020. Adams County Parks and Trails Guide.

<https://adcogov.org/sites/default/files/Adams%20County%20Trail%20Guide%20-%20Updated%20July%202020.pdf>

Adams County. 2021. Personal communication with Veronica McCall, CDOT. February 4.

Adams County. 2022. Advancing Adams County Parks, Open Space and Trails Master Plan.

[https://adcogov.org/sites/default/files/2022-10/POST-Master-Plan\\_v10.2022.pdf](https://adcogov.org/sites/default/files/2022-10/POST-Master-Plan_v10.2022.pdf)

Adams County. (n.d.). Parks, Open Space and Trails Rules and Regulations. Accessed online at <https://epermits.adcogov.org/parks-open-space-trails-rules-and-regulations>.

Adams County Colorado Government Open Data. 2023. *Parks* [GIS data]. Accessed December 2023. [https://data-](https://data-adcogov.opendata.arcgis.com/datasets/4f20a54b3aa54c9e80ab26786d45d55f_0/explore?location=39.828794%2C-104.946938%2C16.94)

[adcogov.opendata.arcgis.com/datasets/4f20a54b3aa54c9e80ab26786d45d55f\\_0/explore?location=39.828794%2C-104.946938%2C16.94](https://data-adcogov.opendata.arcgis.com/datasets/4f20a54b3aa54c9e80ab26786d45d55f_0/explore?location=39.828794%2C-104.946938%2C16.94)

Adams County. n.d. “Rules and Regulations for Adams County - Parks, Open Space, and Cultural Arts (POSCA) Areas”. <https://adcogov.org/sites/default/files/2023-06/Rules-Regulations-for-POSCA-Areas.pdf>

City and County of Denver. 2016. Sand Creek Regional Greenway Trail Denver Segment Master Plan. [https://denvergov.org/files/assets/public/v/1/parks-and-recreation/documents/planning/sandcreekgreenway\\_masterplan.pdf](https://denvergov.org/files/assets/public/v/1/parks-and-recreation/documents/planning/sandcreekgreenway_masterplan.pdf)

City and County of Denver. 2019. Game Plan for a Healthy City. Denver Parks and Recreation. <https://www.denvergov.org/Government/Agencies-Departments-Offices/Agencies-Departments-Offices-Directory/Parks-Recreation/Planning-Design-Construction-Community-Engagement/Game-Plan-for-a-Healthy-City>

City and County of Denver. 2021. “Denver Moves: Bicycles Program.” Denvergov.org. <https://www.denvergov.org/Government/Departments/Department-of-Transportation-and-Infrastructure/Programs-Services/Bicycles>

City and County of Denver. 2022. “Park Use Rules and Regulations”. [https://denvergov.org/files/assets/public/v/3/parks-and-recreation/documents/dpr\\_parkuserulesregulations.pdf](https://denvergov.org/files/assets/public/v/3/parks-and-recreation/documents/dpr_parkuserulesregulations.pdf)

City and County of Denver ArcGIS. 2024. *Parks* [GIS data]. Accessed June 2024. <https://www.arcgis.com/home/item.html?id=45dea022c3fe46cf965fd967782ab701>

City and County of Denver. n.d.-a. “Parks”. Denvergov.org. <https://www.denvergov.org/Maps/map/parks>

City and County of Denver. n.d.-b. “Real Property Map”. Denvergov.org. <https://www.denvergov.org/maps/map/property>

Code of Federal Regulations (CFR). 23 CFR 774.13(d) Temporary Occupancy exception, Chapter 5. <https://www.ecfr.gov/current/title-23/chapter-I/subchapter-H/part-774/section-774.13>.

Code of Federal Regulations (CFR). 23 CFR Part 774.17 Parks, Recreation Area, Wildlife and Waterfowl Refuges, and Historic Sites (Section 4(f)) - Definitions. <https://www.ecfr.gov/current/title-23/chapter-I/subchapter-H/part-774/section-774.17>

Code of Federal Regulations (CFR). 36 CFR Part 800.4. Identification of Historic Properties. <https://www.ecfr.gov/current/title-36/chapter-VIII/part-800> Protection of Historic Properties

Code of Federal Regulations (CFR). 36 CFR Part 800.5. Assessment of Adverse Effects. <https://www.ecfr.gov/current/title-36/chapter-VIII/part-800/>

Colorado Department of Transportation (CDOT). 2023. NEPA Manual. Accessed December 2023. <https://www.codot.gov/programs/environmental/nepa-program/nepa-manual>

Colorado Department of Transportation (CDOT) Online Transportation Information System (OTIS). n.d. *LWCF Project Parcels* [GIS data]. Accessed December 2023. <https://dtdapps.coloradodot.info/MapView/>

Colorado Department of Transportation. 2024. I-270 Corridor Improvements Environmental Impact Statement, Traffic Noise Technical Report, December 12, 2024.

Colorado Parks and Wildlife (CPW). 2023. Colorado Trail Explorer (COTREX). Accessed December 2023. <https://trails.colorado.gov/>

Commerce City. 2012. Walk.Bike.Fit Commerce City: A Multi-Modal Active Transportation Plan. <https://www.c3gov.com/home/showdocument?id=4392>

Commerce City. 2021a. “Eagle Pointe Recreation Center.” C3gov.com. <https://recreation.c3gov.com/recreation-centers-pools/eagle-pointe-recreation-center>

Commerce City. 2021b. “Veterans Memorial Park.” C3gov.com. <https://www.c3gov.com/Home/Components/FacilityDirectory/FacilityDirectory/46/294>

Commerce City. 2021c. “Pioneer Park”. C3gov.com. <https://www.c3gov.com/Home/Components/FacilityDirectory/FacilityDirectory/24/294>

Commerce City. 2023. “Parks, Trails, Open Space and Recreation Map”. C3gov.com. <https://www.c3gov.com/home/showpublisheddocument/18999/638110202812070000>

Commerce City. 2024a. Parks, Recreation and Golf Master Plan. <https://www.c3gov.com/home/showpublisheddocument/22640/638578550015070000>

Commerce City. 2024b. Commerce City Comprehensive Master Plan. Commerce City.

Commerce City. n.d.-a. “Commerce City Park Property Ordinances, Rules and Regulations”. <https://recreation.c3gov.com/home/showpublisheddocument/14406/637673835759270000>

Commerce City. n.d. Ordinances, Rules and Regulations (*italicize*). Commerce City. Accessed online at <https://www.c3gov.com/government/code-central>

Denver Regional Council of Governments. 2019. Denver Regional Active Transportation Plan. Denver Regional Council of Governments. <https://www.c3gov.com/government/city-charter-master-plans/comprehensive-plan>

Fair, Mo, Sand Creek Regional Greenway Partnership. 2024. Personal communication with Veronica Reid, CDOT. January 21.

Federal Highway Administration (FHWA). 2012. “Section 4(f) Policy Paper”. Accessed December 2023. <https://www.environment.fhwa.dot.gov/legislation/section4f/4fpolicy.aspx>

Federal Highway Administration (FHWA). n.d. Environmental Review Toolkit - Section 4(f) Properties - Parks, Recreation Areas, and Refuges Defining Criteria. December 2024. [https://www.environment.fhwa.dot.gov/env\\_topics/4f\\_tutorial/properties\\_parks.aspx](https://www.environment.fhwa.dot.gov/env_topics/4f_tutorial/properties_parks.aspx)

Ferguson, Tracy, Commerce City. 2021. Personal communication with Veronica McCall, CDOT. January 15.

Ferguson, Tracy, Commerce City. 2023. Personal communication with Veronica Reid, CDOT. December 26.

Ferguson, Tracy, Commerce City. 2025. Personal communication with Veronica Reid, CDOT. January 21.

Holloway, Tami, Park Creek Metropolitan District (PCMD). 2024. Personal communication with Veronica Reid, CDOT. September 10.

National Park Service (NPS). 2023. Land and Water Conservation Fund Federal Financial Assistance Manual Volume 72. [https://www.nps.gov/subjects/lwcf/upload/LWCF-FA-Manual-Vol72\\_2023-10-01\\_508.pdf](https://www.nps.gov/subjects/lwcf/upload/LWCF-FA-Manual-Vol72_2023-10-01_508.pdf)

Read, Chrystal, Colorado Parks and Wildlife (CPW). 2024. Personal communication with Veronica Reid, CDOT. December 20.

Sand Creek Regional Greenway Partnership (SCRGP). n.d. "Sand Creek Regional Greenway Maps and Information". [sandcreekgreenway.org](https://www.sandcreekgreenway.org).  
<https://www.sandcreekgreenway.org/navigate-the-trail>

United States Code (USC). 23 USC Section 138. 2001. Preservation of Parklands. November. <https://uscode.house.gov/view.xhtml?req=granuleid:USC-prelim-title23-section138&num=0&edition=prelim>.

United States Code (USC). 49 USC Section 303. 2015. Policy on Lands, Wildlife and Waterfowl refuges, and Historic Sites. December. <https://www.govinfo.gov/content/pkg/USCODE-2023-title49/pdf/USCODE-2023-title49-subtitle1-chap3-subchapl-sec303.pdf>.

U.S. Department of the Interior. 1965. Section 6(f) of the Land and Water Conservation Fund Act. U.S. Department of the Interior. Accessed online at <https://www.agriculture.senate.gov/imo/media/doc/lwcf65.pdf>

U.S. Department of Transportation. 1966. Section 4(f) of the U.S. Department of Transportation Act. U.S. Department of Transportation. Accessed online at [https://www.faa.gov/sites/faa.gov/files/about/office\\_org/headquarters\\_offices/apl/5-dot-act-section4f.pdf](https://www.faa.gov/sites/faa.gov/files/about/office_org/headquarters_offices/apl/5-dot-act-section4f.pdf)

Wells, Owen, City and County of Denver. 2024. Personal communication with Veronica Reid, CDOT. September 10.

## Attachment A. South Platte River Trail Section 4(f) OWJ Exception Form

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## Attachment B. South Platte River Trail Section 4(f) OWJ Letter

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## **Attachment C. Sand Creek Trail and Dahlia Trailhead Section 4(f) Notice of Intent to OWJs to Make de minimis Finding**

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

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