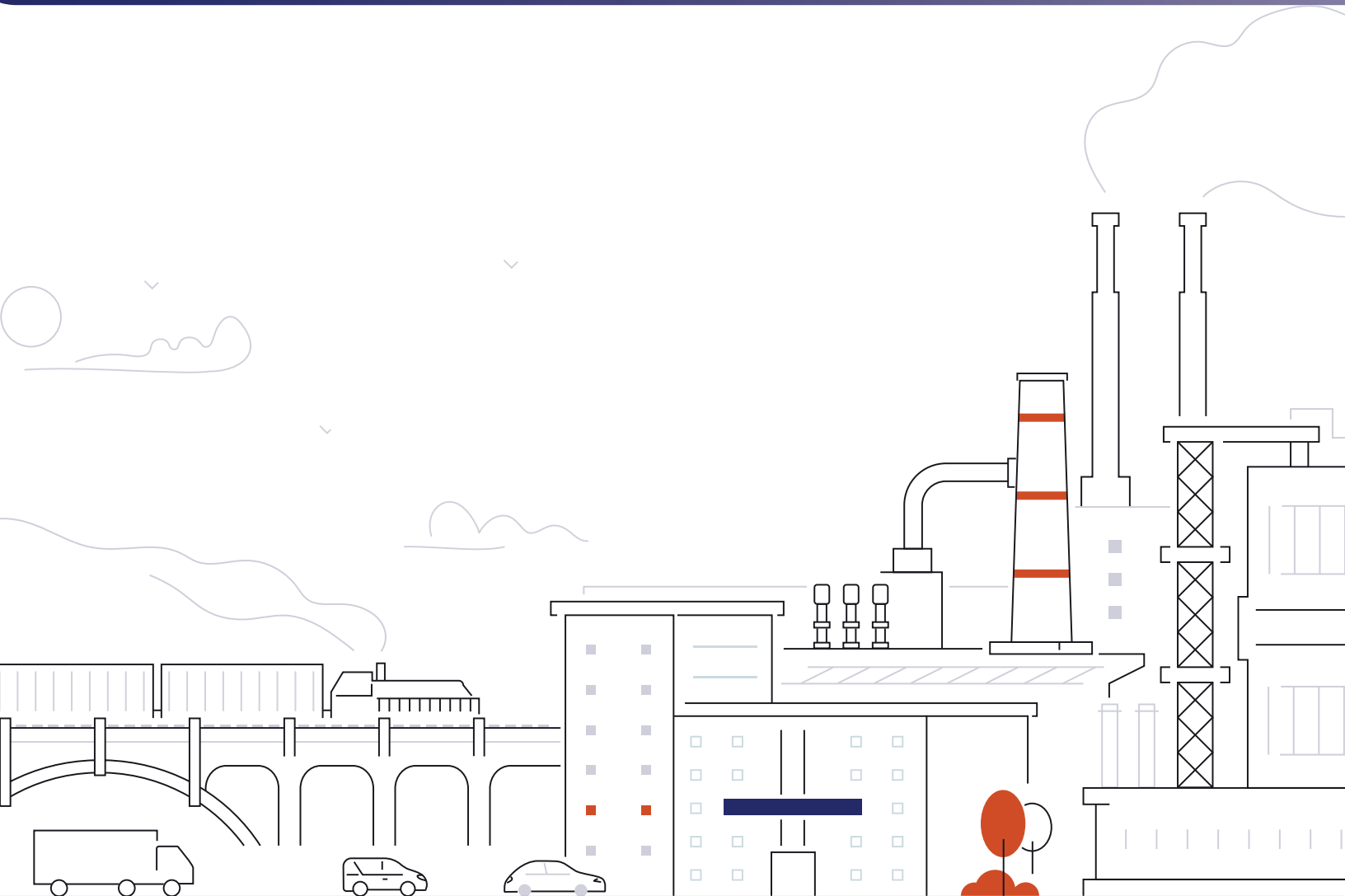


Appendix C4.

Social Resources (Environmental Justice, Land Use, Recreational)





C4. Social Resources (Environmental Justice, Land Use and Recreational Resources) Technical Memorandum

June 2023

Project Number: NHPP 006A-06

Subaccount Number: 22922

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

- Introduction and Background
- Project Study Area
- Purpose and Need
- Proposed Action Description

Environmental Justice and Equity

Legislation and Guidance

Environmental justice is the fair treatment of people of all races, cultures and incomes with respect to the development, adoption, implementation and enforcement of environmental laws and policies. The Federal Highway Administration (FHWA) Order 6640.23 is now titled Order 6640.23A, 'FHWA Actions to Address Environmental Justice in Minority Populations and Low-Income Populations'. CDOT follows the following Environmental Justice Principals within FHWA's policy:

- To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations.
- To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process.
- To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

The following are legislative guidance and orders used to assist in conducting environmental justice analysis:

- Executive Order 12898, Environmental Justice for Low Income & Minority Populations, 1994

- Executive Order 14096, Revitalizing Our Nation’s Commitment to Environmental Justice for All, 2023
- Title VI of the Civil Rights Act of 1964, as amended
- FHWA Order 6640.23A on Environmental Justice, 1994
- Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, 2000
- Executive Order 13985 Advancing Racial Equity and Support for Underserved Communities Through the Federal Government, 2021
- FHWA Guidance on Environmental Justice and NEPA, 2011
- US Department of Transportation (USDOT) Order 5610.2(a) on Environmental Justice, 2012
- FHWA Environmental Justice Reference Guide, 2015
- CDOT National Environmental Policy Act Manual, Version 5, 2017

Methodology

The US Census American Community Survey (ACS) 2015-2019 five-year estimates data was used as the base data set. Where this data was not available, the appropriate data source is noted. As supplemental data, the EPA EJ Screen: Environmental Justice Screening and Mapping Tool was used. When this review was initiated, 2020 Census data had a larger margin of error than the selected dataset. The decision to continue using the ACS 2015-2019 data was due to accuracy and accessibility of data.

A site reconnaissance, conducted through a windshield survey, was completed on April 4, 2022. More information on that site visit can be found in the Site Visit section.

Existing Conditions

Minority Populations

Title VI the Civil Rights definition prohibits discrimination on the basis of race, color and national origin. According to Executive Order 12898, minority populations are defined as any readily identifiable group of minority persons who live in geographic proximity, and, if circumstances warrant, geographically dispersed/transient persons (such as Native Americans) who would be affected by a proposed federal program, policy, or activity. Minority classifications include:

- Black: A person having origins in any of the black racial groups of Africa
- Hispanic or Latin: A person of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture of origin



- Asian American: A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent
- American Indian and Alaskan Native: A person having origins in any of the original people of North America, South America (including Central America), and who maintains cultural identification through tribal affiliation or community recognition
- Native Hawaiian or Pacific Islander: A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

Table 1 identifies the minority populations for the State of Colorado, the counties within the study area and the Census Tracts within the study area. The State and county demographics are provided for comparison to the Census Tract demographics. The predominant minority populations in the study area identify as Hispanic or Latino.

As shown, the State of Colorado is made up of approximately 31.86% minority individuals. In Adams and Denver County, approximately 49.98% and 45.83%, respectively, identify in one of these minority classifications. Within the study area, all Census Tracts exceed the minority percentages for both the state and county populations. The highest percent of minority individuals is within Census Tract 35, with 87.46%. This Census Tract is located in Denver County at the southwest corner of the study area (Figure 1). The lowest percent of minority individuals is within Census Tract 89.01, with a minority population of 66.89%, which still exceeds the county and State percentages.

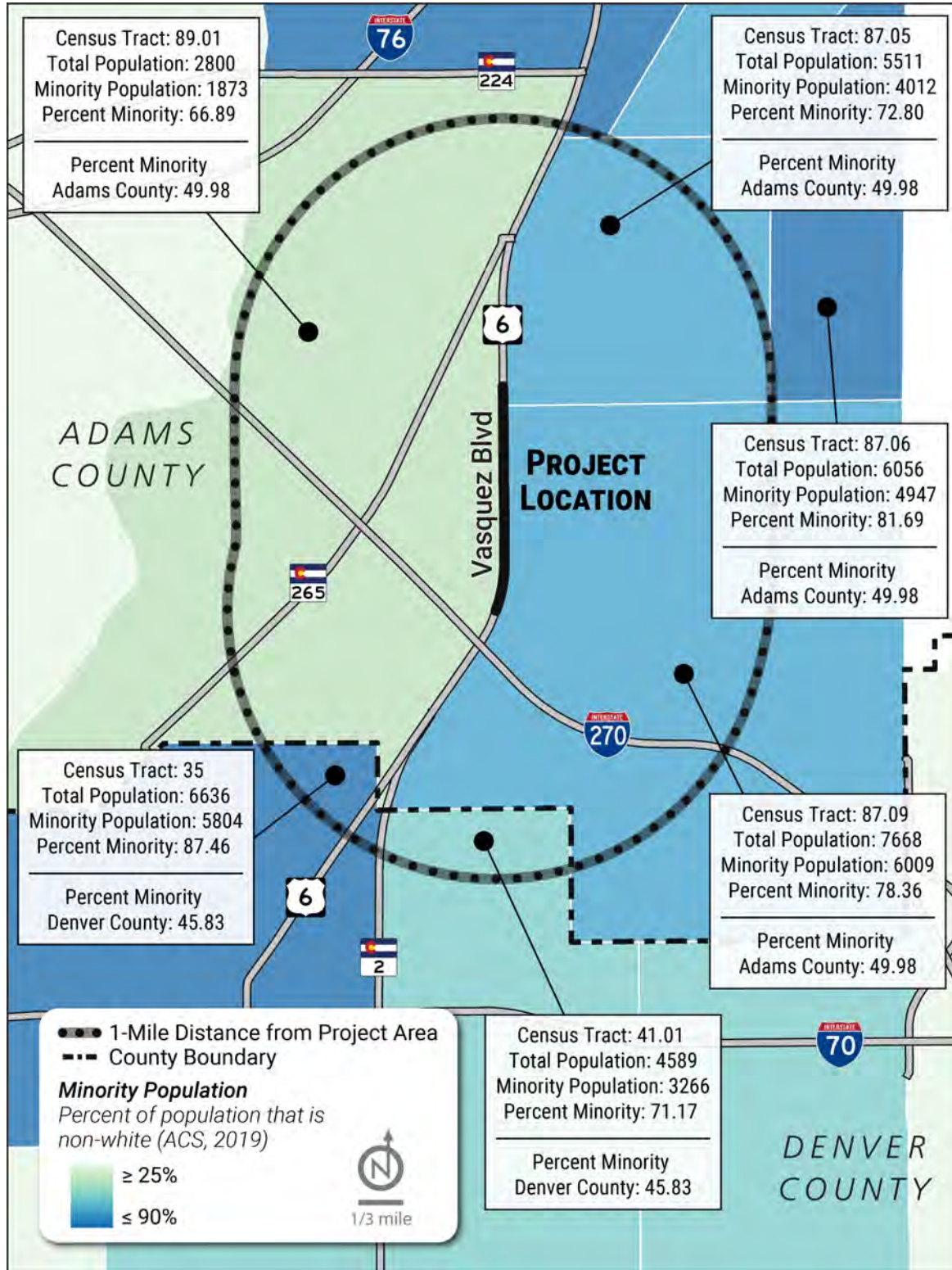
Table 1: Minority Populations

Location	Total Population	Minority Population	Percent Minority	Exceeds County Average?
State of Colorado	5,684,926	1,811,476	31.86%	N/A
Adams County	504,108	251,938	49.98%	N/A
Census Tract 87.05	5,511	4,012	72.80%	Yes
Census Tract 87.06	6,056	4,947	81.69%	Yes
Census Tract 87.09	7,668	6,009	78.36%	Yes
Census Tract 89.01	2,800	1,873	66.89%	Yes
Denver County	705,576	323,348	45.83%	N/A
Census Tract 35	6,636	5,804	87.46%	Yes
Census Tract 41.01	4,589	3,266	71.17%	Yes

ACS 2015-2019



Figure 1: Minority Populations Within One Mile of the Project Area



Low-Income Populations

According to Executive Order 12898, low-income populations are defined as any readily identifiable group of low-income persons (household income is at or below the Department of Health and Human Services (HHS) poverty guidelines) who live in proximity and would be affected by a proposed federal program, policy, or activity. Low-income populations that have potential to be affected were identified in the study area utilizing U.S. Census data at the Tract level. According to the Council on Environmental Quality (CEQ), a Census Tract or area is considered to be a low-income population when either:

- The low-income population of the affected area exceeds 50%. Or
- The population percentage of the affected area is meaningfully greater than the low-income population percentage in the general population or other appropriate unit of geographical unit.

According to 2019 ACS data, 10.3% of the State of Colorado is considered low-income, as well as 10.8% of Adams County and 12.9% of Denver County (Table 2). All but one of the Census Tracts within the study area exceed their State and county low-income averages (Figure 2). Although none of the Census Tracts exceed 50% low-income population, the percentages are still meaningfully greater compared to the county and state percentages. Census Tracts 87.05 and 87.09 have the highest percent of low-income residents in the study area, with 21%. Census Tract 41.01 is the only tract that has a proportion of low-income residents who do not exceed that of the County, however, it does still exceed that of the State.

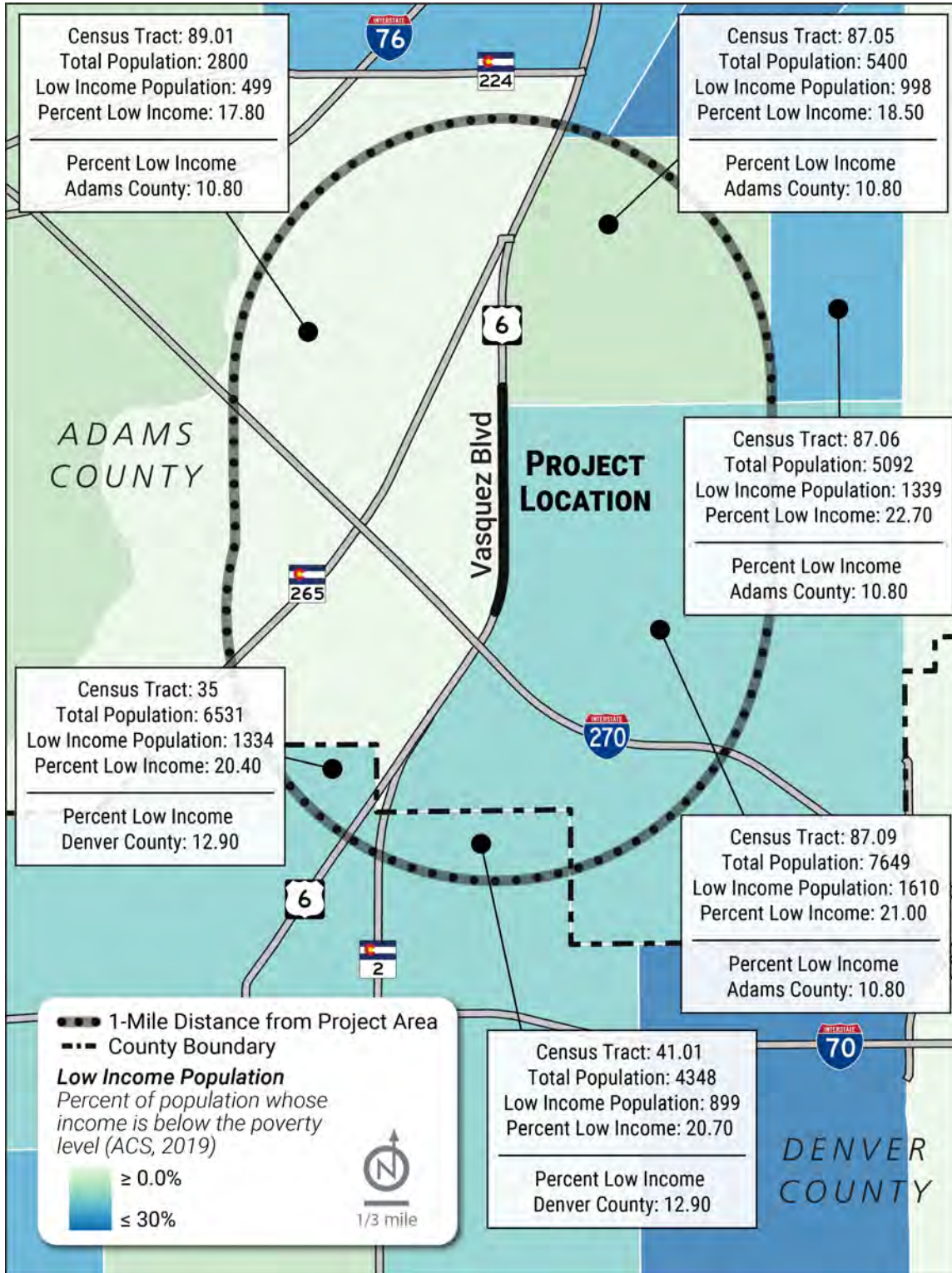
Table 2: Low-Income Populations

Location	Total Population	Population Below Poverty Level	Percent Low-Income	Exceeds County Average?
State of Colorado	5,489,133	565,873	10.30%	N/A
Adams County	499,315	54,159	10.80%	N/A
Census Tract 87.05	5,400	998	18.50%	Yes
Census Tract 87.06	5,092	1,339	21.00%	Yes
Census Tract 87.09	7,649	1,610	21.00%	Yes
Census Tract 89.01	2,800	499	17.80%	Yes
Denver County	693,555	89,203	12.90%	N/A
Census Tract 35	6,531	1,334	20.40%	Yes
Census Tract 41.01	4,348	899	10.70%	No

ACS 2015-2019



Figure 2: Low-Income Populations within One Mile of the Project Area



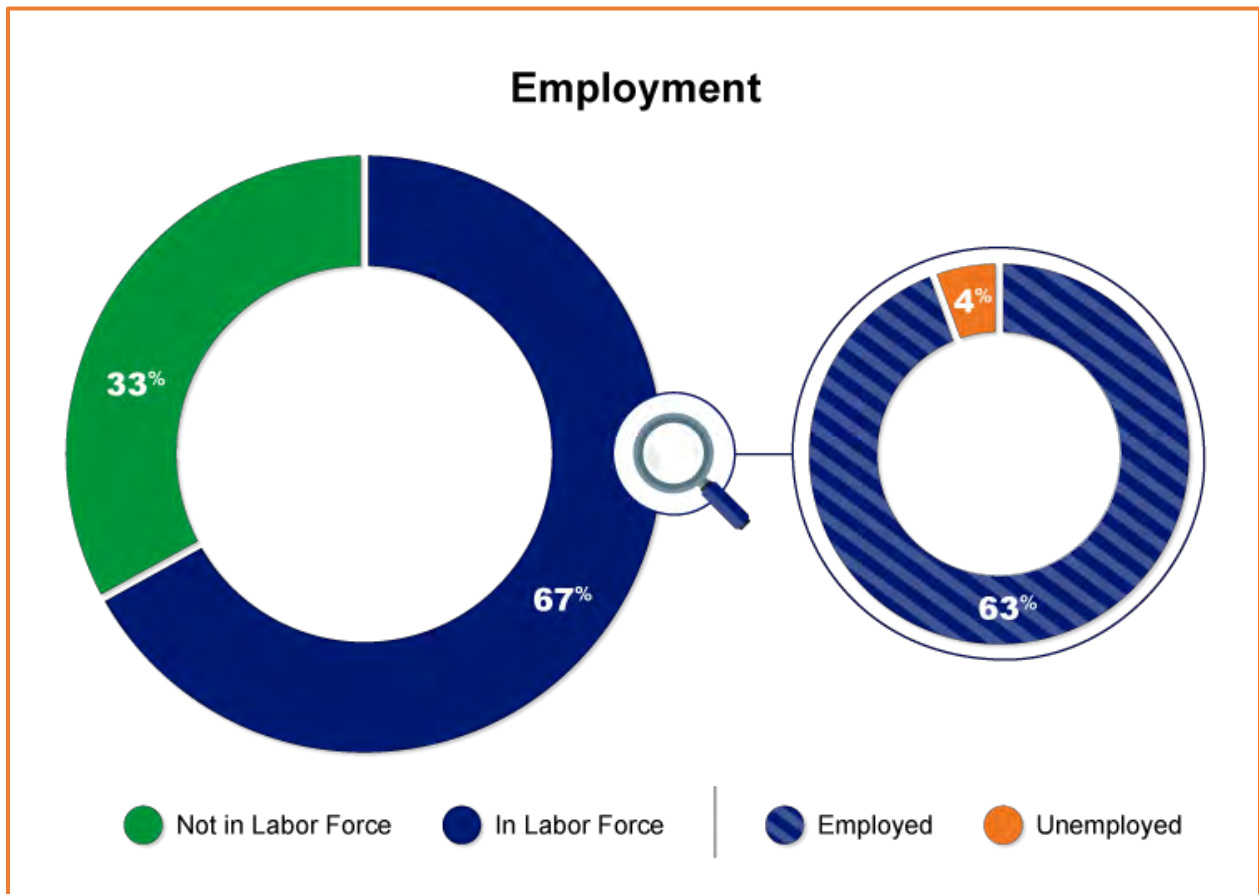


Employment and Economic Viability

In areas with large populations of low-income residents, it is important to consider possible contributing factors, such as the unemployment conditions for the area.

Within the ½ mile Study Area, 67% of the population is part of the Labor Force. 5% of the Labor Force is reported as Unemployed (4% of the total Study Area population). This means that the unemployment rate for the study area population is 5%, which is higher than the unemployment rate for Denver County (3%), Adams County (4%) or the State (4%). The ‘Unemployed’ classification represents those who are actively seeking or available for employment, but do not have a job. The remaining 33% of the population in the Study Area is considered ‘Not in the Labor Force’, residents who are not currently working and are not actively seeking employment. Jobless individuals not currently seeking employment as well as those who are looking but have not searched for employment recently (‘Unavailable Jobseekers’) are included in this classification, as well as retired individuals. A breakdown of this information can be found in Figure 3.

Figure 3. Employment



Source: ACS 2015-2019



This data infers that 37% of the population within the Study Area is not currently employed; this percentage is either actively seeking but unable to find employment or currently not seeking employment.

Many factors contribute to an area’s unemployment rate; such as large populations of persons with physical or mental impairments, lack of transportation options or accessibility, and a lack of nearby opportunities for employment (also known as economic viability).

A notable 23% of the population within a ½ mile buffer of the Study Area are persons with physical or mental impairments; this proportion is higher than the percentages reported in Commerce City (16%), Adams County (15%), and the State of Colorado (14%). 11% of the Study Area population is also made up of Seniors (age 65+), which is higher than in the whole of Adams County (10%) but lower than for the State (14%). The local population of persons with disabilities may contribute to the 33% who are ‘Not in the Labor Force’.

Other factors that may contribute to the Study Area’s unemployment rate of 6% include:

- Gaps in access to or affordability of public transportation,
- Limited local employment opportunities;
- Large Senior population (65+ years of age); and
- Gaps in access to employment opportunities.

The ACS 2019 data was used to collect data for the census tracts within the Study Area. Table 3 shows the unemployment rates of the Census Tracts that are within one mile of the project area. This data is also represented in Figure 4. Many of the census tracts have unemployment rates at a much higher percentage than county rates.

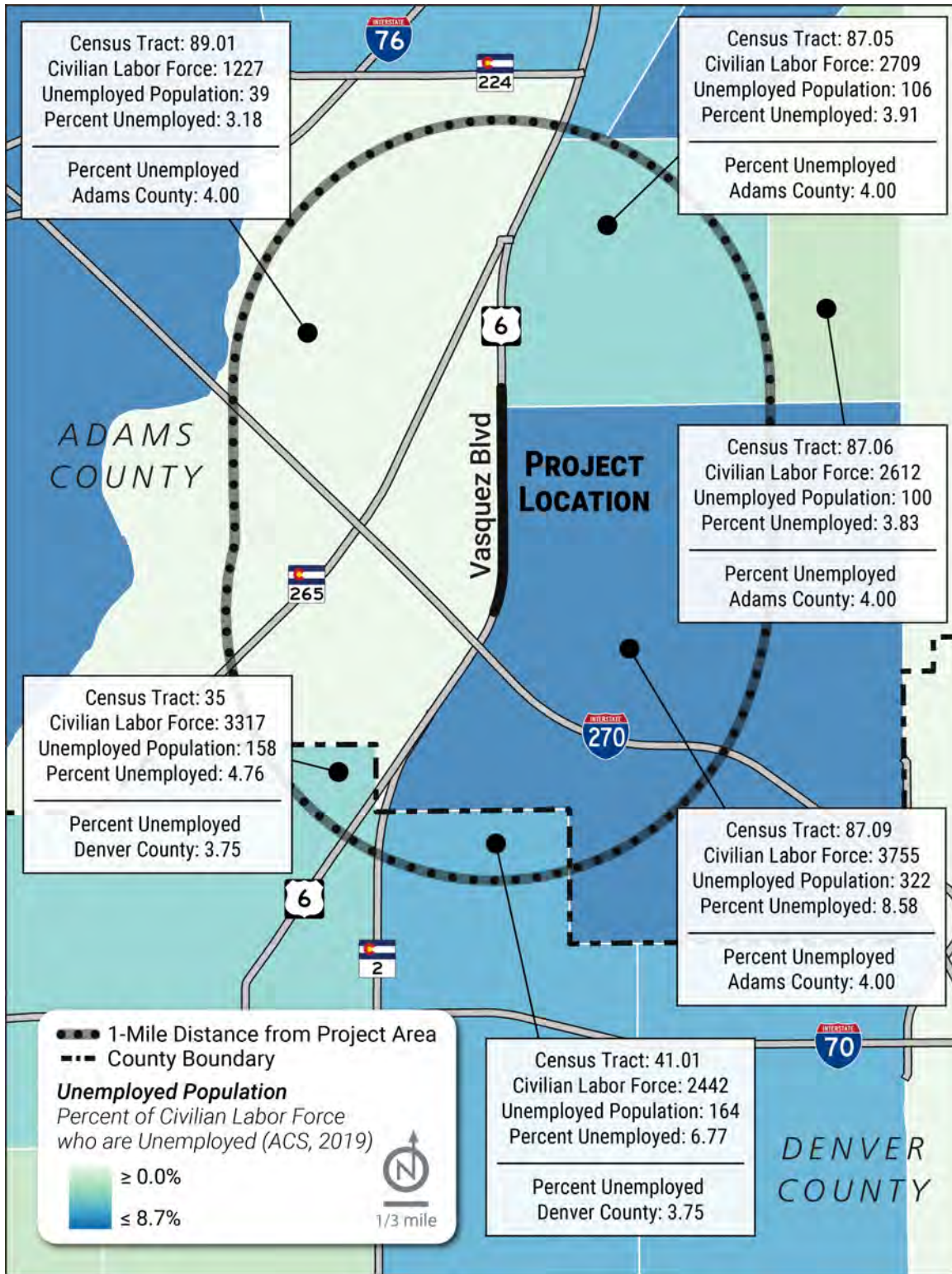
Table 3: Unemployment Rates within 1 Mile of the Project Area by Census Tract

Location	Civilian Labor Force	Population Unemployed	Percent Unemployed
Adams County	N/A	N/A	4%
Census Tract 87.05	2,709	106	3.91%
Census Tract 87.06	2,612	100	3.83
Census Tract 87.09	3,755	322	8.58
Census Tract 89.01	1,227	39	3.18
Denver County	N/A	N/A	3.75%
Census Tract 35	3,317	158	4.76
Census Tract 41.01	2,442	164	6.77

Source: ACS 2015-2019



Figure 4. Unemployment Rate by Census Tract in Project Area





Local Businesses and Community Resources

With a large portion of the study area being commercial, maintaining or improving access to local businesses is crucial for the economic stability of this area. Facilities such as recreation centers, schools, churches/religious facilities and community gathering places are particularly important to this area due to their impact on the residents’ quality of life.

Pedestrian access to community services such as groceries, medical services, pharmacies, pet care, laundry facilities, and banks, also improves the quality of life for residents (Table 4)(Figure 5). Improving the accessibility to these resources helps establish the equitable use of services for communities.

Additionally, the project team reviewed three databases for minority and/or female-owned, and small and/or emerging business certifications; the Denver Small Business Certification and Contract Management System, CDPHE's Colorado EnviroScreen and the Colorado Office of Economic Development and International Trade Minority Business Office Business Directory. From these databases, 68 individual businesses were identified within the project zip code, and were then located geographically to review potential impacts to these properties. No potentially impacted businesses with these certifications were identified.

Although no businesses were identified by the databases, there could still be minority-owned or minority-employing businesses within the study area, that have simply not applied for these certifications.

Table 4: Community Resources within the Study Area

Resource #	Place Name	Address	Type Of Resource	Potential Impacts
1	160 Driving Academy of Denver	6025 Parkway Dr Unit 105	Educational/professional training	Improved access from Parkway Drive
2	GOAL Highschool	6026 Parkway Dr Unit 125B	Educational/ Professional training	Improved access from Parkway Drive
3	Walmart Supercenter	5990 Dahlia St	General goods and groceries, pharmacy	No impacts expected
4	Dollar Tree	6011 Dexter St	General goods and groceries	No impacts expected
5	King Soopers	4850 E 62 nd Ave	General goods and groceries, pharmacy	Improved access off of E 62 nd Ave



Resource #	Place Name	Address	Type Of Resource	Potential Impacts
6	Phillips 66	4981 E 64 th Ave	General goods and groceries, pharmacy	No Impacts expected
7	ACE Cash Express	4952 E 62 nd Ave Unit A4	Service	Improved access from 62 nd Ave
8	Lougi Nails & Spa	4952 E 62 nd Ave Unit A5	Service	Improved access from 62 nd Ave
9	Great Clips	4952 E 62 nd Ave Unit A6	Service	Improved access from 62 nd Ave
10	Bank of America	4952 E 62 nd Ave Unit A9	Service	Improved access from 62 nd Ave
11	Open and Affordable Dental Commerce City	4972 E 62 nd Ave B-1	Service	Improved access off of E 62 nd Ave
12	Rent A Center	4972 E 62 nd Ave B2	Service	Improved access from 62 nd Ave
13	Adventure Dental, Vision and Orthodontics	6075 Parkway Dr Ste 160	Service	Improved access from parkway Drive
14	The Feline Fix	6075 Parkway Dr	Service	Improved access from parkway Drive
15	BPL Plasma	6075 Parkway Dr	Service	Improved access from parkway Drive
16	Risas Dental	6091 Dexter St	Service	Improved access from Dexter St and new proposed street
17	Playland Coin laundry	6025 Parkway Dr #171	Service	Improved access from parkway Drive
18	Fred Loya Insurance	6025 Parkway Dr	Service	Improved access from Parkway Drive



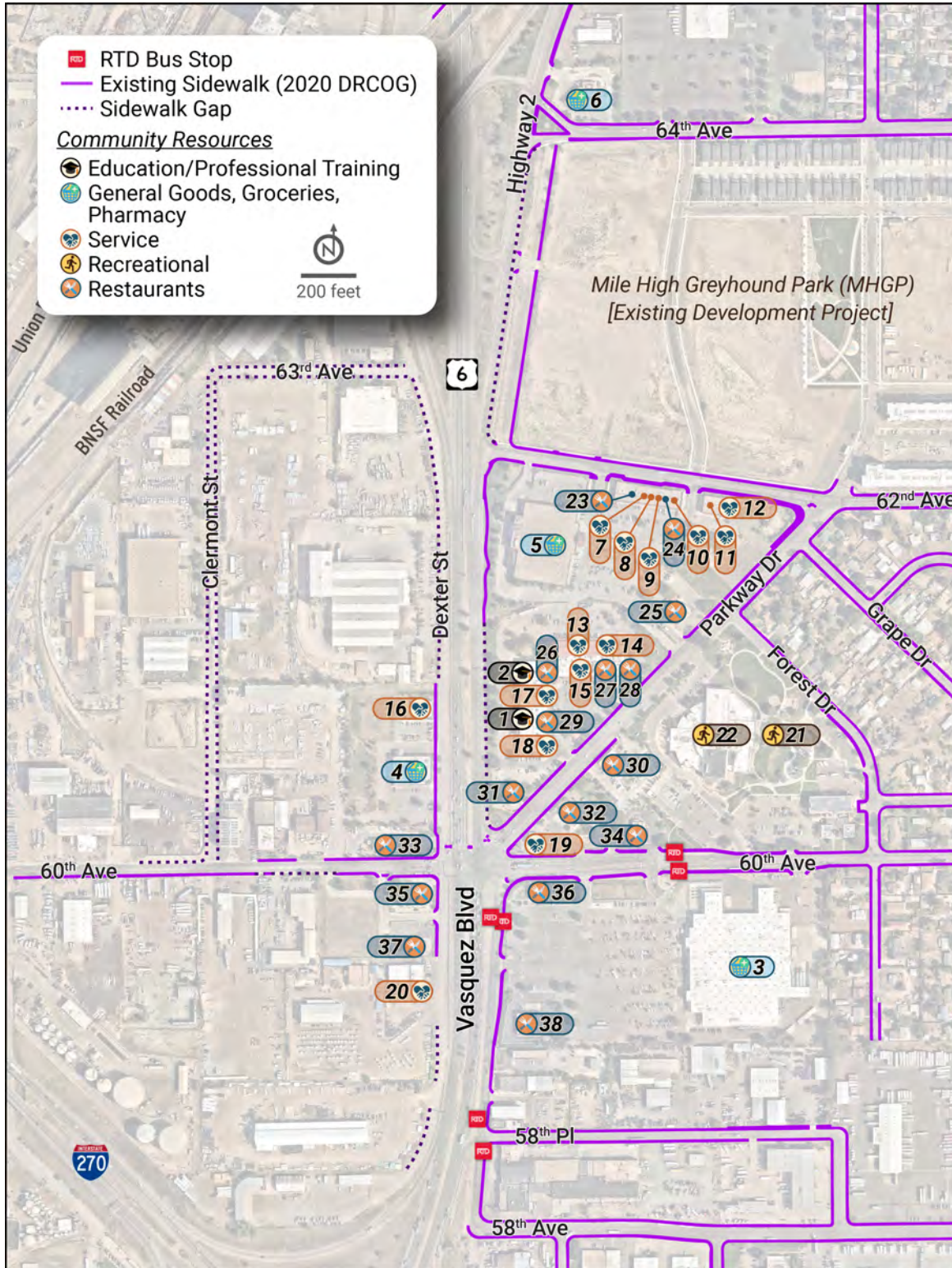
Resource #	Place Name	Address	Type Of Resource	Potential Impacts
18	Wells Fargo Bank	6025 Parkway Dr #195	Service	Improved access from Parkway Drive
19	Grease Monkey	6000 Parkway Drive	Service	Improved access from Parkway Dr
20	Mullen Tire & Service	5901 Dexter St	Service	No impacts expected
21	Veterans Memorial Park	Veterans Memorial Park, Parkway Dr	Recreational Service	Northern corner of park removed to create sidewalk bump-outs at intersection of Parkway Drive and Forest Drive
22	Eagle Pointe Recreation Center	6060 Parkway Dr	Recreational Service	No impacts expected
23	Wing Stop	4952 E 62 nd Ave	Restaurant	Improved access from 62 nd Ave
24	Los Tamales	4952 E 62 nd Ave	Restaurant	Improved access from 62 nd Ave
25	Pizza Hut	6125 Parkway Dr	Restaurant	No impacts expected
26	Mama's Café	6025 Parkway Dr Suite 160	Restaurant	Improved access from Parkway Dr
27	Mei Wei	6075 Parkway Dr	Restaurant	Improved access from Parkway Dr
28	Subway	6075 Parkway Drive Suite 103	Restaurant	Improved access from Parkway Dr
29	Taco River	6025 Parkway Dr #107	Restaurant	Improved access from Parkway Dr
30	McDonalds	6050 Parkway Dr	Restaurant	Improved access from Parkway Dr



Resource #	Place Name	Address	Type Of Resource	Potential Impacts
31	Jack in the Box	6015 Parkway Dr	Restaurant	Improved access from Parkway Dr
32	Taco Bell	4901 E 60 th Way	Restaurant	Improved access from Parkway Dr
33	Wendy's	6001 Dexter St	Restaurant	Improved access from Dexter St
34	KFC	5101 E 60 th Way	Restaurant	No impacts expected
35	Starbucks	4850 60 th Ave	Restaurant	Improved access off 60 th Ave
36	Carl's Jr.	5998 Dahlia St	Restaurant	Improved access from Dahlia St and 60 th Ave
37	Arby's	5995 Dexter St	Restaurant	No impacts expected
38	Chipotle	5988 Dahlia St	Restaurant	No impacts expected



Figure 5: Existing Accessibility to Community Resources

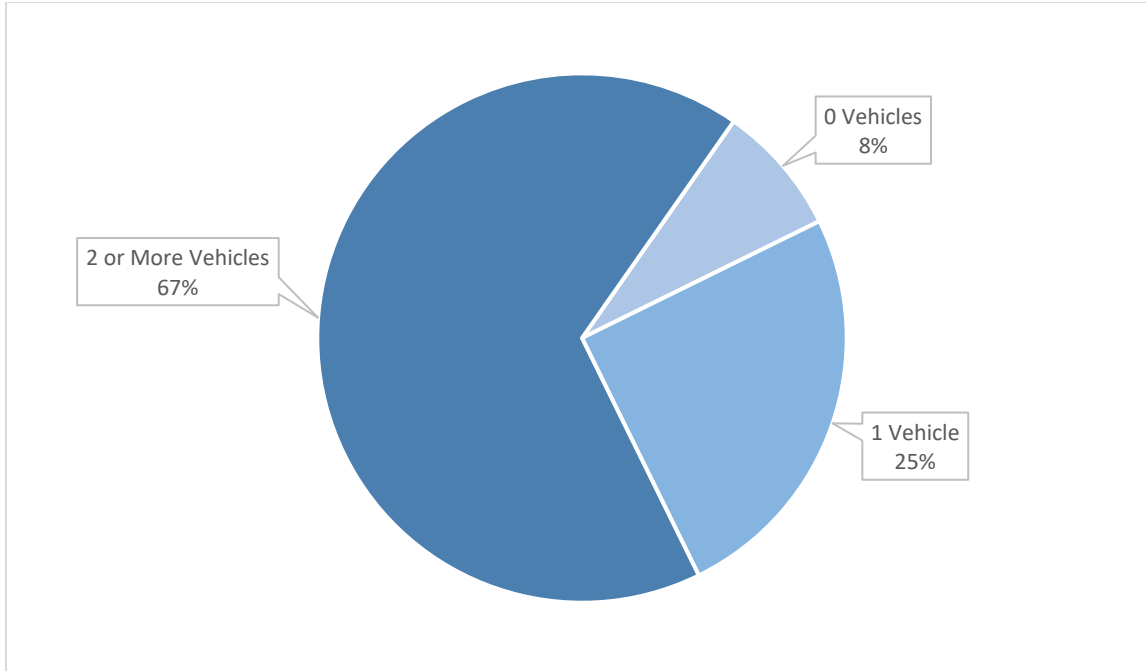




Pedestrian Facilities and Transit Dependency

The FHWA Screening Tool for Equity Analysis of Projects (STEAP) was used to determine that approximately 8% of households within a ½ mile buffer from the Study Area do not own a vehicle (Figure 6). Additionally, the STEAP found that 25% of households owned only one vehicle, despite 90% of households having more than one occupant.

Figure 6: Vehicle Ownership within 1/2 Mile from the Study Area



Source: FHWA Screening Tool for Equity Analysis of Project

Table 5 compares the population of the Census Tracts within the study area to the county and State totals for modes of transportation to work. While transportation by car, truck, or van is the most popular, there are still community members in all Census Tracts that rely on public transportation for travel.

Within the project area there are currently bus stops located at the corner of Dahlia and 58th Place, Dahlia Street and 60th Ave, on 60th Ave near the Walmart Supercenter, and 60th Ave and Glencoe Street. Coordination between Commerce City, the Regional Transportation District (RTD) and the project team has occurred throughout this study. Commerce City intends to implement bus stop improvements in the project corridor separately from this project.

Half of the Census Tracts have employees that commute to work only by walking. Vasquez Boulevard is a barrier for pedestrians who rely on public transit services and walkability to their place of employment.



In respect to accessibility, all new construction of crosswalks, crossing signals, sidewalks and public properties access will be in compliance with the Americans with Disabilities Act (ADA) design specifications. As previously mentioned, 23% of the population within a ½ mile buffer from the Study Area is a person with disabilities. This makes ADA compliance and accessibility of public spaces particularly relevant to this Project.

Table 5: Modes of Transportation to Work for Employees aged 16 Years and Over

Location	Total Population	Car/Truck/Van Single-Driver	Car/Truck/Van Carpool	Public Transportation	Taxi, Motorcycle, Or Bicycle	Walked
State of Colorado	2,647,472	2,004,370	246,013	82,163	61,433	68,754
Adams County	234,857	182,615	27,062	8,746	2,592	3,040
Census Tract 87.05	2,110	1,603	311	104	9	0
Census Tract 87.06	2,143	1,600	418	112	13	0
Census Tract 87.09	2,869	2,144	330	134	122	89
Census Tract 88.01	2,159	1,831	236	33	23	0
Census Tract 88.02	1,872	1,470	281	23	56	0
Census Tract 89.01	931	753	121	5	6	26
Census Tract 150	1,115	837	87	59	28	53
Denver County	350,971	247,749	28,800	23,649	11,844	15,007
Census Tract 35	2,827	1,878	450	214	99	94
Census Tract 41.01	1,658	1,321	94	147	19	0

Source: ACS 2015-2019



Air Quality and Environmental Justice

CRS 43-1-128 law does not apply to this corridor, as the Project is not defined as a regionally significant transportation capacity project. While this law does not apply, environmental justice evaluations do assess potential health impacts caused by transportation facilities, particularly when those impacts affect minority and low-income populations. Since the Study Area consists of predominately low-income and minority residents, it is important to understand existing air quality concerns and evaluate how they could be improved or worsened by the No Action or Proposed Action alternatives.

EPA's EJScreen data was used to identify the following existing air quality-related concerns within the ½ mile buffered Study Area from the Project:

- In the 99th State percentile and 98th national percentile for Air Toxic Cancer Risk
- In the 98th State percentile and 95th national percentile for Diesel Particulate Matter
- In the 98th State percentile and 87th national percentile for Particulate Matter
- In the 92nd State percentile and 91st national percentile for Ozone

Air Toxic Cancer Risk, Diesel Particulate Matter, Particulate Matter and Ozone measurements relate to health risks associated with air quality conditions.

Limited English Proficiency

Individuals within the Study Area who speak only a language other than English are considered to be Limited-English Proficient (LEP). Every Census Tract within the Study Area has anywhere from 6%- 40% of its population who have limited english speaking ability (Table 6). Spanish-speaking adults are the majority of the LEP population. Persons who are LEP make up more than 14% of the population for each census tract but one (Census Tract 41.01). All but Census Tract 41.01 surpasses Adams County and Denver County averages for LEP populations. Census tracts with the highest proportion of LEP persons are located both on the north side of the Study Area, and the southwest (Figure 7).

A small amount of the population also speaks Asian and Pacific Islander languages, as well as other languages not listed in the Census data. These populations make up 1% of the population within the Study Area, and less than 5% of the population of any individual census tract within the Study Area, so additional action was not warranted to address translations for these populations.



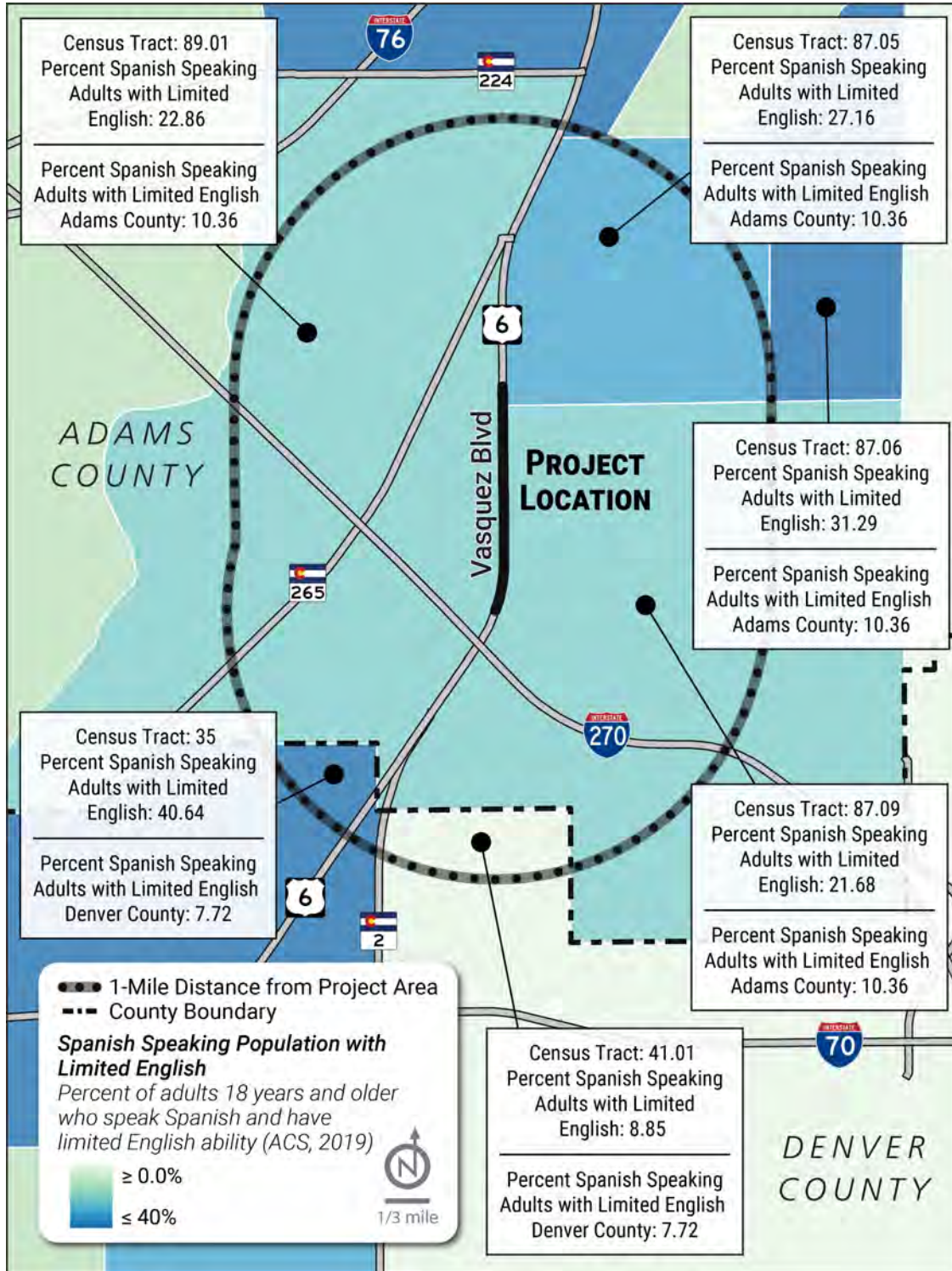
Table 6: Limited English Proficiency

Location	Total Population (Over 18)	Percent Of Adults Over 18 Who Have Limited English Ability	Population That Speaks Other Languages With Limited English Ability				Percent Of Spanish Speaking Adults With Limited English
			Spanish	Indo-European	Asian And Pacific Island	Other Languages	
Adams County	368,248	12.82%	38,154	2,700	5,386	965	10.36%
Census Tract 87.05	3,962	27.4%	1,076	0	0	10	27.16%
Census Tract 87.06	4,033	32.6%	1,262	13	0	41	31.29%
Census Tract 87.09	5,402	22.2%	1,171	0	26	0	21.68%
Census Tract 89.01	1,942	23.3%	444	0	9	0	22.86%
Denver County	565,889	40.6%	43,697	4,028	6,969	3,482	7.72%
Census Tract 35	4,774	6%	1,940	0	0	0	40.64%
Census Tract 41.01	3,588	23.3%	210	0	6	0	8.85%

Source: ACS 2015-2019



Figure 7: Limited English Populations





Neighborhoods

The project study area is entirely within the City of Commerce City. Figure 8 shows the neighborhoods within the project study area according to the Commerce City Open Data Site. On the west side of Vasquez Boulevard, the Clermont and Mill Valley neighborhoods are mostly zoned as Industrial; ranging from Light-Intensity to Heavy-Intensity Industrial. The Adams Heights neighborhood is mostly zoned Single-Family Detached Residential with a mixture of Commercial and Industrial parcels.

Lane Gardens, Mile High Greyhound Park, Central and 56th Avenue Industrial Park neighborhoods are all located on the east side of Vasquez Boulevard. Memory Lane Gardens, and Central neighborhoods are predominately zoned as Single and Multi-Family Residential with some Commercial and Public zoned parcels throughout. The Mile High Greyhound Park is zoned as a Mixed-Use property with Commercial, Single and Multi-Family housing. The property is rapidly developing with Single-Family homes, Multi-Family residences, hotels, retail and outdoor recreation areas. Central neighborhood has a wide range of residential properties from Single-Family to Multi-Family residential homes and units. The 56th Avenue Industrial Park neighborhood is zoned Light-Intensity to Medium-Intensity Industrial.

Community Profile

The City of Commerce City's demographic data for households and families was compared against the State of Colorado, Adams County and Denver County demographic data (Table 7). The project limits are within Commerce City limits, but the study area is within Adams and Denver County. Commerce City has a higher percentage of houses that are Single-Family Owner-Occupied compared to state and county averages, but the City has the smallest average household size of all three.

Income Analysis

Throughout the study area, the median-income in all Census Tracts, counties, and the State have increased in the past decade (Table 8). The largest median-income increase was in Census Tract 35 with a \$27,614 increase, and the smallest increase was in Census Tract 87.09 with a \$5,844 increase.

The median household-income has been growing exponentially in the past decade. Census Tract 35 had an average median household-income growth rate of almost 95%. For comparison, Denver County as a whole had an average median household-income growth rate of almost 51%. Census Tract 87.09 had the lowest median household-income growth rate and the highest percentage of unemployment. Typically, lower median household-income growth rates have a negative correlation with the percentage of unemployment in the Census Tract. Census Tracts 87.05 and 89.91 also experienced significant median-income growth from 2010 to 2019.



Figure 8: Neighborhood Boundaries within the Project Area

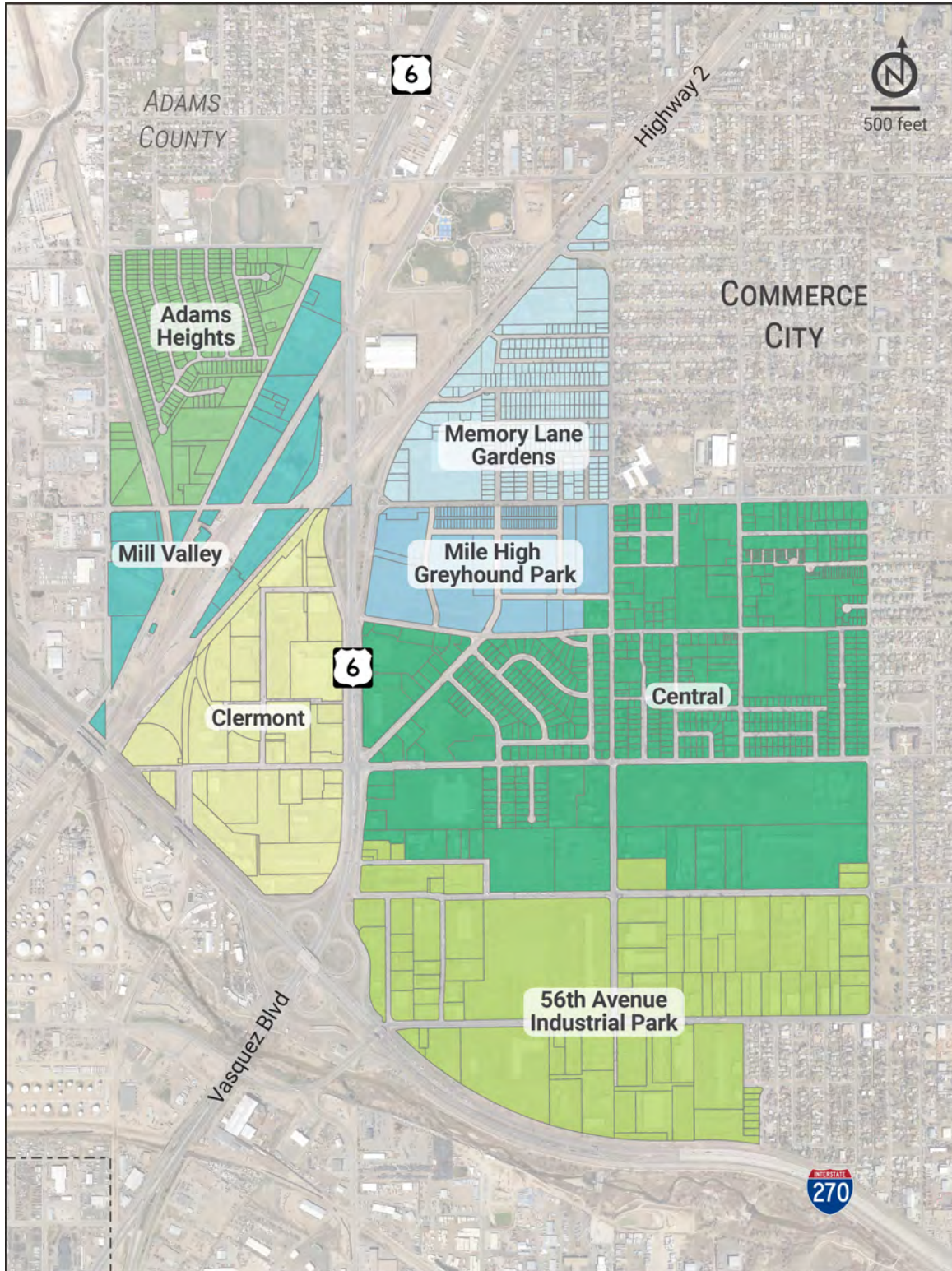


Table 7: Population, Demographics, and Housing Unit Estimates

Location	Households: Total Households	Households: Average Household Size	Families: Total Families	Families: Children Under 6 Years Old	Families: Children From 0-17 Years Old	Families: Children 6-17 Years Old	Housing Tenure: Owner-Occupied	Housing Tenure: Renter-Occupied	Units In Structure: Single-Family	Units In Structure: Multi-Family
State of Colorado	2,148,994	2.56	1,369,378	22.4%	19.7%	57.9%	65.2%	34.8%	71.0%	25.1%
Adams County	166,450	3.00	117,036	20.6%	24.5%	54.9%	66.2%	33.8%	71.2%	22.6%
Denver County	301,501	2.29	146,070	27.9%	19.9%	52.2%	49.9%	50.1%	54.1%	45.6%
Commerce City	17,282	1.36	13,121	22.3%	26.7%	51.1%	75.2%	24.8%	88%	9.1%

Source: ACS 2016-2019



Table 8: Median Household Income (Inflation-Adjusted Dollars)

Location	2010	2019	Growth 2010 - 2019	Average Growth Rate
State of Colorado	\$56,456	\$72,331	\$15,875	28.11%
Adams County	\$54,666	\$71,202	\$16,536	30.25%
Census Tract 87.05	\$38,056	\$55,703	\$17,647	46.37%
Census Tract 87.06	\$40,743	\$52,768	\$12,025	29.51%
Census Tract 87.09	\$35,986	\$41,830	\$5,844	16.24%
Census Tract 89.01	\$35,672	\$59,286	\$23,614	66.12%
Denver County	\$45,501	\$68,592	\$23,091	50.75%
Census Tract 35	\$28,528	\$55,587	\$27,059	94.85%
Census Tract 41.01	\$31,310	\$43,234	\$11,924	38.08%

Source: ACS 5-year 2010-2015 and 2016-2019

Site Visit

A site visit was conducted on April 4, 2022. The site visit was conducted entirely within the roadway from a vehicle. As Vasquez Boulevard is heavily trafficked with minimal pedestrian access, the windshield survey was the most practical way to visit the project area. The project study area is mainly divided by Vasquez Boulevard with industrial and commercial being on the west, and residential and commercial uses to the east. Many chain and fast-food restaurants, convenience stores (groceries, laundromats, banks, car repair), and industrial factories/supply centers are located adjacent to Vasquez Boulevard.

Construction for the Mile High Greyhound Park complex has begun between 62nd Avenue and 64th Avenue. Sidewalks have been constructed by the Greyhound Park developer along 62nd Ave along the property, however, to accommodate the proposed road improvements this project would be replacing this sidewalk.

Along the eastern edge of the project study area, within the Memory Lane Gardens and Central neighborhoods, a number of bi-lingual signage was observed at commercial properties. It was also noted that multiple schools (Rose Hill Elementary, Kearney Middle School, Central Elementary School, Victory Preparatory Academy and Sunshine Head Start) are located to the east of the project study area (Attachment B: Photograph Log).



Impacts

No Action

In the No Action scenario, safety and access conditions along Vasquez Boulevard would not change. Regular maintenance activities would continue.

Benefits

In the No Action condition, no notable benefits are anticipated to the Economic condition, Equity or Environmental Justice of the Study Area.

Burdens

With the Mile High Greyhound Park constructing more commercial and residential facilities in the Study Area, increased pedestrian and vehicular traffic is anticipated in both the No Action and Proposed Action conditions; increased traffic would worsen the safety conditions and comfort for all corridor users. In the No Action condition, the growing needs by the community would continue to cause problems for adjacent areas. A decline in safety and comfort in a predominately low-income and minority community leads to greater risk of inequity and worsens existing conditions.

As traffic congestion increases with ongoing construction, accessibility to existing and future local businesses would worsen; with the No Action condition, access to these businesses would remain the same, likely resulting in negative impacts on the employees and patrons. The economic viability of the surrounding area would be negatively affected as well, leading to further economic resource concerns.

In the No Action condition, the increase in congestion and standstill traffic would likely worsen existing air quality concerns; the effects of worsening air quality conditions on the Study Area's residents would, in turn, worsen the existing EJ conditions.

Proposed Action

Benefits

The Proposed Action would improve the current comfort and safety conditions for pedestrians, transit users and passenger vehicles in the Study Area; providing safer and easier access to local residential properties will benefit the EJ populations in the area, and community resources will also be more accessible through improved vehicular mobility, sidewalk availability and crosswalks.

With the addition of a sidewalk between Parkway Drive and 62nd Avenue, more pedestrians would have direct access to the Mile High Greyhound Park residential and commercial properties. This would likely benefit the economic viability of the area by improving accessibility to new businesses, and from new residential properties to existing businesses. Such improvements to economic viability may also improve job accessibility for low-income residents, improving the EJ conditions for the Study Area.

The Proposed Action would improve the safety of pedestrian crossings and would assist in connecting the eastern residential areas to the western commercial and industrial area of the corridor, improving the current pedestrian barrier effects of Vasquez Boulevard.



Sidewalks, curb ramps and driveways would be improved to meet ADA standards, further improving accessibility for all pedestrians. ADA accessibility would improve equity and EJ for the surrounding communities, as well as corridor pedestrian users.

The improvements provided by the Proposed Action would increase pedestrian access along the corridor, and potentially decrease the need for vehicular transportation. This improved pedestrian access is especially beneficial to EJ populations who might not have access to an automobile, or who may rely on public transit for mobility.

These improvements would also increase equity for the corridor by improving quality of life for local residents. Improved pedestrian access of the area improves access to community resources such as parks, schools, grocery stores and churches/religious facilities.

The Proposed Action has the potential to assist in decreasing the unemployment rates of the area by improving access to public transportation facilities and connectivity of sidewalks. Walkable and bikeable access is essential for an area where 8% of households do not own a vehicle, and members of every census tract walk to work.

Congestion in the Study Area is anticipated to be reduced through enhanced signal timing and restriping of Vasquez Boulevard. With southbound Vasquez Boulevard having a continuous lane at the 62nd Avenue intersection, the air quality conditions are anticipated to improve. These improvements would benefit the existing EJ conditions of the corridor.

Burdens

During construction, business owners, residents in the area, and travelers of the corridor may be impacted by limited access and traffic congestion. Users may also experience traffic dust and noise during construction hours. The census tracts of the Study Area are comprised of EJ populations, which will experience the most direct impacts from construction burdens. These impacts would be short-term and temporary.

Partial property acquisition would be required from commercial properties along 60th Avenue, Clermont Street, Dexter Street and Parkway Drive. This would include the loss of outdoor commercial/industrial storage areas or undeveloped space, however, no long term hardship on businesses are anticipated due to the property acquisitions. Three restaurants along Dexter Street (Arby's, Starbucks and Wendy's) are anticipated to have partial property acquisitions, without long term hardship or direct impacts to business operations occurring as a result. These restaurants are identified in Figure 5 near the intersection of Vasquez Boulevard and 60th Avenue. There would be no direct impacts to any business operations or residential properties from these acquisitions.

Overall travel time throughout the corridor will be decreased with the proposed improvements, however an increased travel time may be experienced with the restricted turning movements. Restricted turning movements and potential impacts to businesses are described below.

Southbound Dexter Street north of 60th Avenue would become a right turn only onto 60th Avenue (Figure 9). Businesses south of 60th Avenue are still accessible by vehicles using the new local road connections. This change in turning movements may increase travel time for



users. The improvements would add new sidewalks, a pedestrian island, and crosswalks for safer pedestrian movement and improved connectivity.

Northbound Dexter Street south of 60th Avenue would become a one-way southbound only road (Figure 9). The existing northbound movement along this portion of Dexter Street would be removed. To access 60th Avenue or Parkway Drive, drivers would use the new local roadways, which adds an additional city block of out-of-direction travel to make those connections.

Access to businesses would be available for all properties in the study area. Intersection improvements are intended to optimize vehicle and pedestrian safety. Although direct turning

movements would be restricted for the Vasquez Boulevard/60th Avenue intersection, the new local roads would allow movements and access to be maintained. Frequent users of the corridor may need to reassess current travel routes and reacclimate to the modified movements of Vasquez Boulevard, 60th Avenue, and 62nd Avenue intersections. Increased safety at the intersections would promote pedestrian and vehicular usage and attract travelers to use local businesses and services.

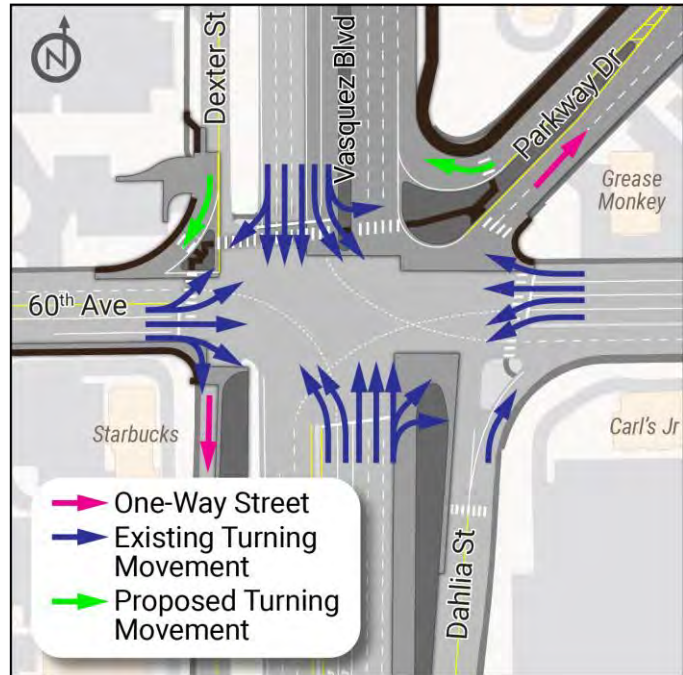
Impact Statement

Based on the above discussion and analysis, the proposed action will not cause disproportionately high and adverse effects on any minority or low-income populations in accordance with the provisions of EO 12898 and FHWA Order 6640.23A. The proposed action will not cause adverse effects on the equity conditions of the study area, or existing economic resources.

ROW and Relocation Acquisitions

There would be no full-parcel property acquisitions required for this project. Portions of properties would be purchased for the construction of the local roads to navigate around Vasquez Boulevard. The partial-property acquisitions would only be from commercial properties without any building acquisitions. There would be no business displacements, and it is anticipated there would be more accessibility to local commercial properties with the addition of local roads and improvements to the intersections along Vasquez Boulevard. The proposed roads would not disturb any green-space or natural areas. The proposed roads are anticipated to create safer navigation for traffic and pedestrians in the area.

Figure 9. 60th Avenue Proposed Action





Mitigation, Recommendations and Public Involvement

The Proposed Action has been developed to provide transportation benefits to the multimodal and vehicular travelers of the study area. During construction, efforts would be made to avoid and minimize any short-term impacts to the residents and properties in the area. Adequate and safe vehicle and non-motorized detours will be in place to allow mobility to be maintained throughout the project area. Local noise ordinances and planning detours can be utilized to reduce the amount of construction impacts there are to residents and commuters through the project area. Maintaining access to all local businesses is also recommended to minimize any impacts during construction. The ROW-acquisition process would include translation services for each property owner, if necessary. All property acquisitions would adhere to state and federal guidelines regarding acquisition policies. Landowners should be paid “just compensation” for necessary property acquisitions.

Public involvement opportunities and community outreach efforts shall be utilized by the project team to facilitate proper notice and coordination with the public on the Proposed Action. Meaningful public participation opportunities that incorporate special consideration to communities of low-income, minority and limited-English populations are to be and has been incorporated throughout project design. Proper translation and accessibility must be accommodated for all public involvement opportunities. Coordination with local planners and other city officials would also be necessary to receive support from the community.



Public Engagement Considerations

Addressing Limited English Proficiency

For persons with LEP, language can be a barrier to participation in planning studies and transportation design projects. In accordance with Title VI of the Civil Rights Act of 1964 and Executive Order 13166, CDOT's Policy Directive 604.0 provides that no person on the ground of race, color, national origin, sex, disability, or age, be excluded from participation in, be denied the benefits of, or be subjected to discrimination in any operation of CDOT or of any department or agency to which CDOT extends federal assistance. This policy directive also states that "CDOT shall seek to communicate with LEP populations, and provide LEP individuals meaningful access to CDOT programs and activities." (CDOT Limited English Proficiency Plan, 2021).

As previously stated, every Census Tract within the Study Area has 6% - 32% of its population who have LEP, with Spanish-speaking adults making up the large majority of this population.

To equitably engage LEP populations in or adjacent to the Study Area, all public outreach to date was developed and presented with translation options available. During the PEL Study, focus groups, one-on-one meetings, one public open house, a project website, a project hotline, and a project flyer were used to engage the community. At in-person events, and via the project Hotline, a Spanish translator was made available. For all informational project materials (online, in the flyer and presentation materials) both Spanish and English text was used.

Additional public outreach activities have been conducted. This outreach includes:

- Small-group presentations to stakeholders (Mile High Greyhound Park, Freight Advisory Council Steering Committee)
- Focus group meetings (including freight industry, Pedestrian and Bicyclist Travel, Spanish language, and Business focus groups)
- King Soopers Pop-up event
- Postcard mailers
- Project factsheets
- Social media and local news updates
- City Council briefings

All materials distributed on the project included Spanish translations, and all in-person events had a Spanish translator present.

CDOT will continue to provide Spanish translations during any future public engagement efforts and of any project document upon request.

Virtual Accessibility

According to the STEAP analysis, approximately 20% of the households within ½ mile from the study area do not have a computer at home. Within this same population, approximately 27% of households do not have internet connection at home. These proportions of the population



are notably higher than the greater populations of Commerce City, Adams County, or the State of Colorado (Figure 10).

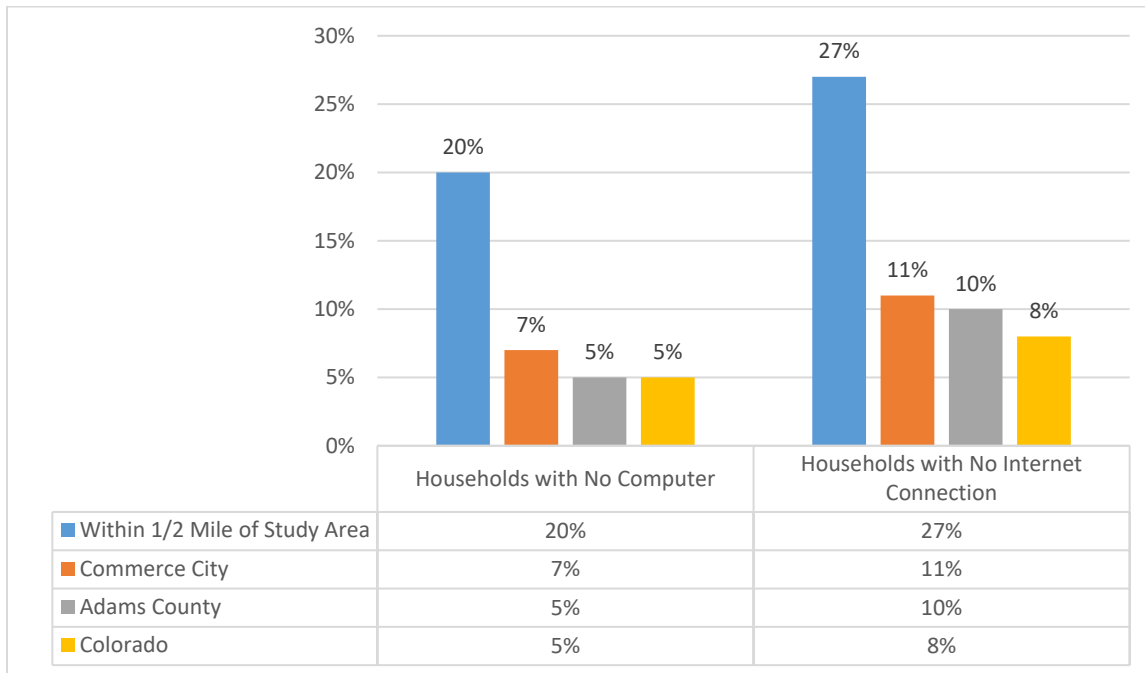
A lack of computer ownership and internet access at home often correlates with low-income, and disadvantaged communities. What this data means for the proposed Project is that public engagement efforts will need to offer in-person options to equitably involve EJ communities surrounding the Project. Possible in-person engagement efforts include:

- Delivering door-to-door flyers of project information.
- When surveying the public, use both electronic and paper versions of the survey.
- Posting informational flyers in community gathering places, with a phone number to reach the project team with comments and questions.
- Coordinate pop-up event opportunities in or near community gathering places.
- Hosting in-person workshops or open houses in local, easily accessible locations.
- Providing phone participation options for any online meetings
- Advertise for the project at community ‘internet access spots’, such as the recreation center, Starbucks, or nearby libraries.

Any of these engagement activities will require numerous occasions, with varying locations, and times of day that the events occur, in order to fairly access all portions of the population. For example, hosting an event during working hours on a week day may be inaccessible to certain communities, such as working, single-parents. Likewise, hosting an event on a Sunday morning may be inaccessible to church-goers. A variety of engagement opportunities will provide the most equitable outreach approach for in-person outreach.



Figure 10: Virtual Accessibility



Public Outreach Completed to Date

Due to the presence of EJ populations within the study area, public outreach and involvement is of the utmost importance to provide equitable access and gain input on the proposed project. To date, the following outreach efforts have been completed:

- A pop-up event was held on January 11, 2020 at the King Soopers property located at the corner of Vasquez Boulevard and 62nd Avenue, which is within the project study area and provided opportunity for all residents in the area to participate. Fact sheets were distributed at the event with materials in English and Spanish and in-person Spanish interpretation was available.
- A project website page was made available on CDOT’s website. This website has helped to inform users on the project and give an additional opportunity to provide comments.
- A presentation was made to the Freight Advisory Council Steering Committee to get their input and open the line of communication with the industry and project team.
- Focus group meetings have been held with the freight industry, business, multimodal travel and Spanish language communities. During these meetings, the focus was on the needs of the area for residents and commuters of the project study area.

To date, no public comments have been received. Four additional public engagement points are planned to occur throughout project design:

- Property owner review of conceptual design
- Engagement with the public and stakeholder groups to present the Draft Preferred Alternative
- Engagement with the public at the Midpoint of the NEPA process



- Engagement with stakeholder groups at final (90%) design

Mitigation measures would not be required as part of the Proposed Action; however, mitigation would be needed during construction. Local businesses must be informed of the Project's construction activities and access to the businesses must be maintained throughout construction. Corridor construction would also be phased to minimize congestion impacts and traffic. If necessary, a detour for roadway and sidewalks should be set with appropriate signage for safe travel through construction activities.

Land Use

Legislation and Local Policies

Commerce City Land Development Code was adopted in August of 2020 and last updated in May of 2021. The Code is designed to promote health, safety, and public welfare. The purpose of the code is to:

- Avoid undue concentration of population,
- Conserve property values,
- Encourage diversity in land use types,
- Encourage the most appropriate use of land throughout the city,
- Encourage urban environments,
- Ensure a logical growth of the various physical elements of the city,
- Improve housing standards,
- Prevent the overcrowding of land,
- Promote economic development,
- Promote pleasing aesthetics and minimize eyesores,
- Promote safety from dangers,
- Provide adequate light and air, and
- Reduce congestion in the streets.

The Commerce City C3 Vision Comprehensive Plan became effective May 1, 2010. The Comprehensive Plan was created to set forth the vision, goals and policies of the community, to help guide development and investment decisions. It sets the stage for development regulations, ongoing decision-making, and guides Commerce City in funding programs and capital investments. A 2021-2022 Plan Update (Commerce City 2045) is expected to be published in 2023 to address the next 25 years of the city's future.

Walk. Bike. Fit Commerce City: A Multi-Modal Active Transportation Plan became effective in 2012 and aims to help Commerce City mature into a healthy, prosperous, diverse and vibrant community by creating a safe, pleasant, practical, and affordable multimodal active travel network accessible to all residents and businesses. The document assisted in planning for future multi-modal use around the City.

Methodology

Current land use information was collected through reviews of local and regional land use plans and data from Commerce City, to assess surrounding land use. This information assisted in the evaluation of the related land use plans and a determination of the impacts of the No Action and Proposed Action.

Existing Conditions

The study area is located entirely within Commerce City and land use contains or is adjacent to properties zoned for commercial, industrial, public and residential land use. The land use to the east of Vasquez Boulevard is a mix of residential and commercial uses, whereas the land use to the west of Vasquez Boulevard is almost entirely commercial and industrial. **Commerce City has been one of the Metro Area's fastest growing communities and developing land has doubled within the past few decades.** According to the Existing Conditions Report for the Commerce City 2045 Plan, the study area falls within an Urban Growth Boundary. The Urban Growth Boundary was identified within an intergovernmental agreement between the City of Thornton and City of Commerce City in 1989. The Urban Growth Boundary identifies the South Platte River as the natural boundary between the two cities and their future growth area. The Urban Growth Boundary follows the river to the north through I-76 and incorporates the Denver International Airport North Special Planning Area.

The Commerce City Urban Renewal Authority identifies blighted areas for redevelopment. The Urban Renewal Authority assists the City in planning for Urban Renewal Areas to provide a mechanism to redevelop these areas. An example of one of these Urban Renewal Areas can be seen within the study area, at Mile High Greyhound Park - a public property that was purchased by the Commerce City Urban Renewal Authority in 2011. Previously, the property was occupied by a Greyhound dog racing facility and stadium. This designated Urban Renewal Area is set to construct commercial retail, single-family residential, and affordable housing units. **In October of 2020, there was an official groundbreaking of the property's construction.** This development will create a mixed-use property, likely attracting residential tenants and commercial traffic to the area.

The surrounding properties are comprised of commercial, industrial, public and residential properties. Figure 11 shows current land use as of November 2021, and Figure 12 shows future land use planned for the year 2040 from the City of Commerce City Assessors Data. Table 9 lists the existing and planned future land use in and adjacent to the project study area.

Impacts

No Action

The No Action is inconsistent with adopted land use plans and the Vasquez Boulevard PEL.

Proposed Action

The Proposed Action would be consistent with the intent of existing regional-transportation and land-use plans. The Vasquez Boulevard PEL recommended additional roadway connections to the west of the 60th Avenue/Vasquez Boulevard intersection to address congestion, access to local businesses, and improving safety. During design, the PEL proposed local road alignment conflicted with obtainable ROW, which resulted in a modified local road alignment. This new alignment still addresses the intent of reducing congestion, access to local businesses and improving safety. The new local road will be constructed by CDOT and owned and maintained by the City of Commerce City.

Improving non-motorized transportation connection opportunities will support the planned residential and commercial properties in the project area. The proposed project is addressing vehicle congestion and increased traffic volumes, which is due to planned land use changes that increase residential, commercial and industrial distribution properties near the project.

Mitigation

Mitigation measures would not be required as part of the Proposed Action.



Figure 11: Current Land Use

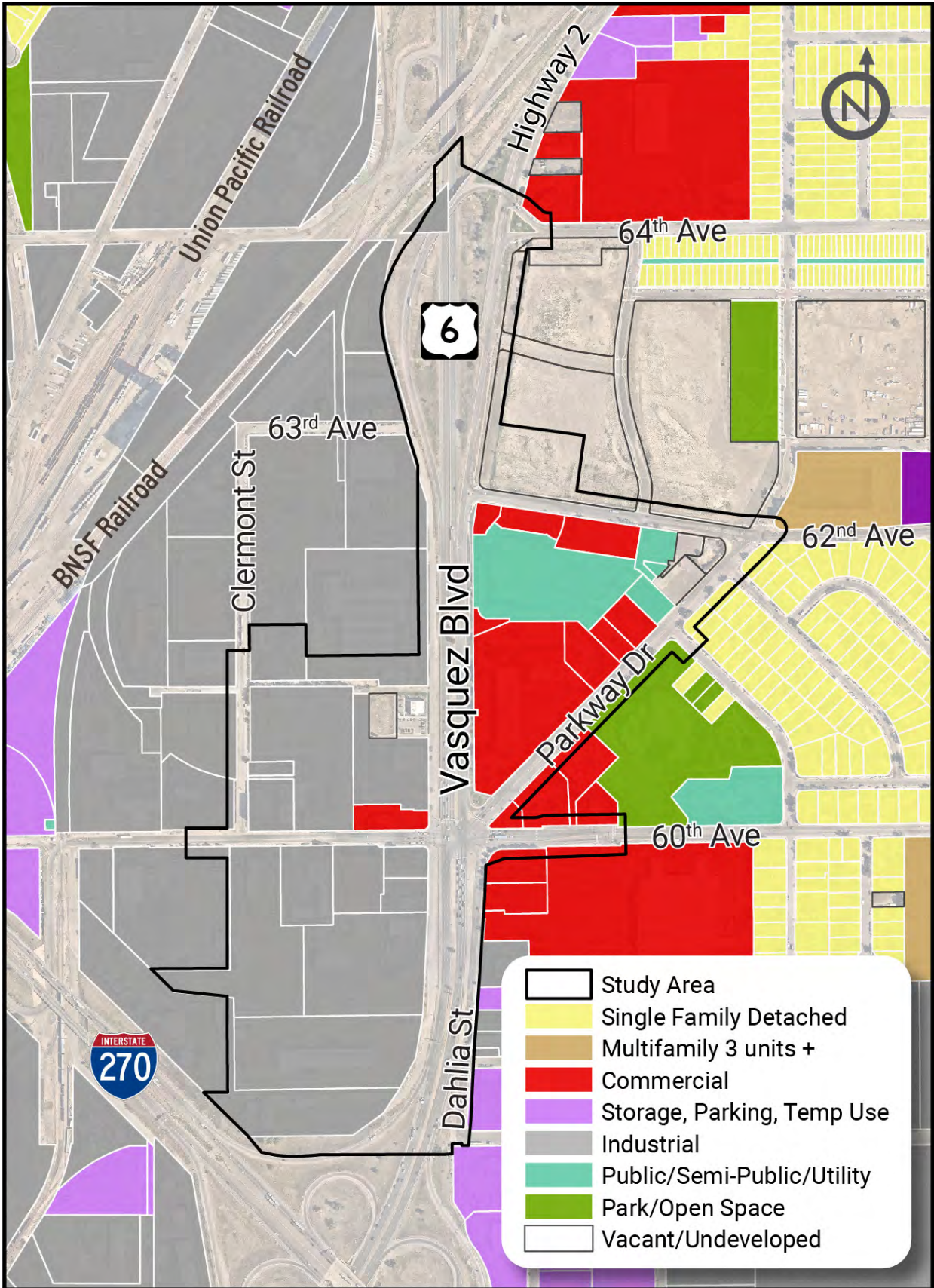




Figure 12: Future Land Use

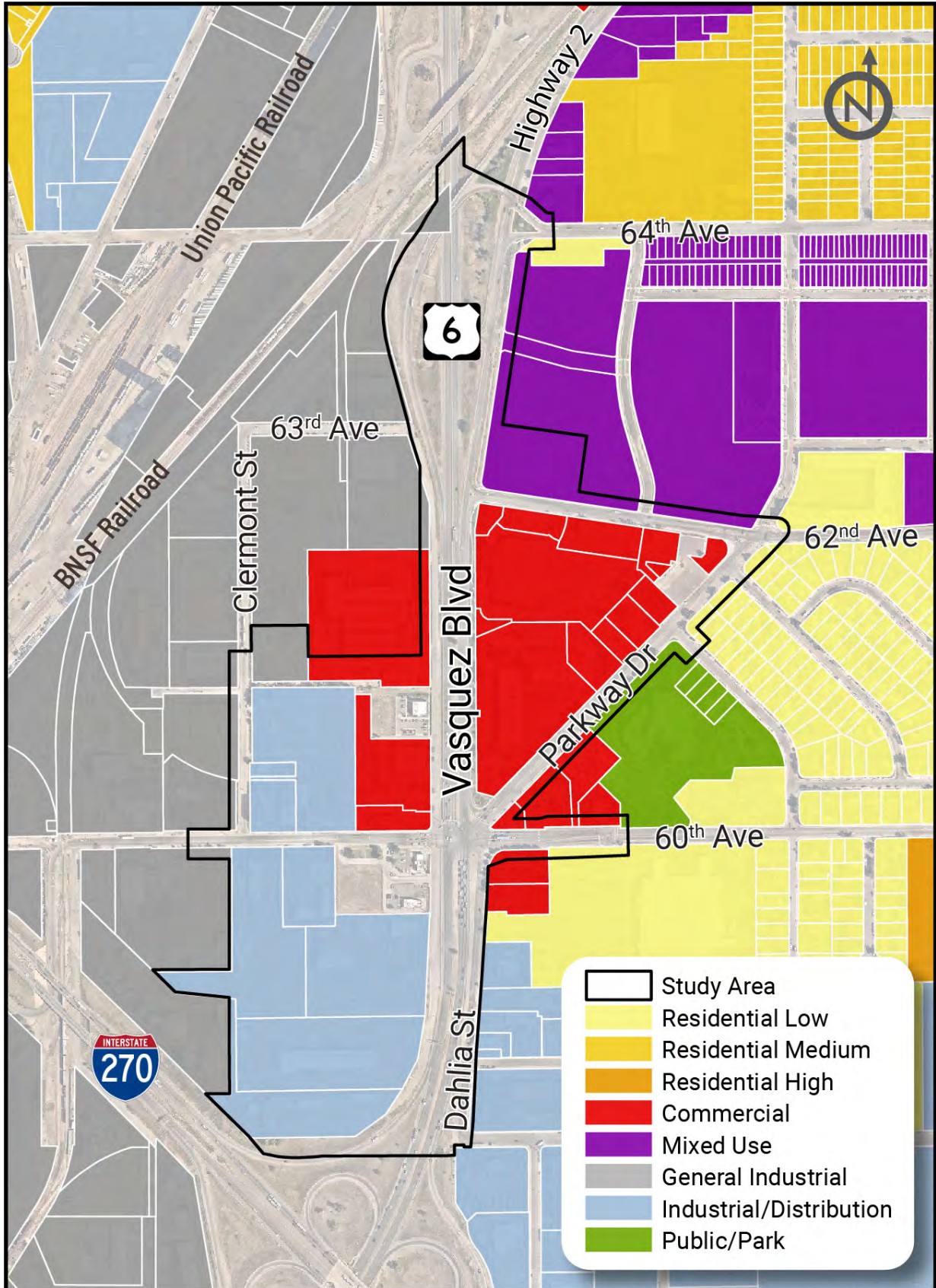




Table 9: Existing and Planned Future Land Use Within and Adjacent to Project Area

Property Name	Type Of Use	Size	Status
Pepper Tank Company	Commercial	8.92 acres	Existing
CRFOLSOM Real Estate LLC	Industrial	6.12 acres	Existing
Semmaterials Energy Partners LLC	Commercial	5.02 acres	Existing
Dexter Site LLC	Commercial	2.81 acres	Existing
4540 E 60 th Ave LLC (CO Scaffolding & Equip)	Industrial	1.82 acres	Existing
Spirit Properties LLC	Commercial	6.06 acres	Existing
Fate Enterprises LLC	Commercial	2.24 acres	Existing
Stewart and Stevenson Power Products LLC	Commercial	5.14 acres	Existing
5884 Dahlia Street LLC	Commercial	0.10 acre	Existing
5846 Acquisition CO LLC	Commercial	0.28 acre	Existing
5850 Dahlia LTD	Commercial	0.95 acre	Existing
Dahlia Car Wash Inc	Commercial	1.17 acres	Existing
Wal-Mart Real Estate Business Trust	Commercial	14.71 acres	Existing
Brandner Constance J Trust (Carl's Jr)	Commercial	0.96 acre	Existing
Harman-Management Corporation (KFC)	Commercial	0.75 acres	Existing
City of Commerce City (Eagle Pointe Rec Center)	Public	8.61 acres	Existing
McDonalds Corporation	Commercial	1.29 acres	Existing
Taco Caliente Inc (Taco Bell)	Commercial	0.89 acre	Existing
Murphy James P (Grease Monkey)	Commercial	0.44 acres	Existing
Wendy's Properties	Commercial	0.81 acres	Existing
Mikhail Shawky W	Commercial	2.72 acres	Existing
Risas Dental	Commercial	1.19 acres	Existing
Bubb LLC	Commercial	5.19 acres	Existing
Tiley Holding LLC	Industrial	1.45 acres	Existing
DCPS Real Estate Clermont LLC	Commercial	2.18 acres	Existing
BNSF Railway Company	Public	2.60 acres	Existing
Kummer Investments LLC	Commercial	1.42 acres	Existing
Zirulinik Sandor/Burgess Trust	Industrial	8.14 acres	Existing
Thompson Kenneth R and Thompson Vera A	Industrial	6.95 acres	Existing



Property Name	Type Of Use	Size	Status
Richards and Dexter LLC	Industrial	3.68 acres	Existing
Parkway Market LLC	Commercial	8.41 acres	Existing
KRF Commerce City LLC	Commercial	10.12 acres	Existing
Carrillo Jorge	Residential	0.20 acre	Existing
Valenzuela Exiquio and Valenzuela Elvira	Residential	0.20 acre	Existing
Thompson James R	Residential	0.20 acre	Existing
Ruybal Patrick P	Residential	0.20 acre	Existing
RMCT LLC	Residential	0.20 acre	Existing
Rodriguez Manuel	Residential	0.20 acre	Existing
Ramos Nathaniel and Ramos Graciela	Residential	0.20 acre	Existing
Grimard Ollie P and Shannon Melinda S	Residential	0.27 acre	Existing
Urban Renewal Authority of City of Commerce City	Mixed-Use	65.32 acres	Planned
DCW Family Holdings LLC	Commercial	1.21 acres	Existing
Impacto De Fe	Commercial	1.25 acres	Existing
Ferrer Lorenzo	Commercial	1.0 acre	Existing
Sharpless Claude J Jr	Residential	0.75 acre	Existing
LTC Properties Inc	Residential	1.70 acres	Existing

Source: Commerce City Open Data



Recreational Resources, Recreational Section 4(f) and Section 6(f) Properties

Legislation

The study area (Figure 13) contains or is adjacent to environmental resources that fall under the jurisdiction of Section 4(f) of the US Department of Transportation (USDOT) Act and Section 6(f) of the Land and Water Conservation Fund (LWCF) Act consideration (Table 10).

Section 4(f) of the USDOT Act of 1966 is a regulation applicable only to federally-funded transportation projects that received funds from the USDOT and is implemented by FHWA through 23 CFR, Section 774. Under this regulation, the following resources are protected:

- Parks and recreational areas of national, state, or local significance that are both publicly owned and open to the public;
- Historic sites of national, state, or local significance in public or private ownership; and
- 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.

Section 4(f) stipulates that FHWA and other agencies under the purview of the USDOT may not approve a “use” of a Section 4(f) property unless there is no feasible and prudent avoidance alternative and all efforts to minimize harm to the resource have been implemented. In addition, future public recreation facilities that are documented in an official planning document (local municipality or jurisdiction parks and recreation plan, land use plan, etc.) are also considered Section 4(f) properties.

The LWCF Act of 1965 established a federal funding program to assist states in developing outdoor recreation sites. Section 6(f) of the LWCF Act prohibits the conversion of property acquired or developed with these funds to a non-recreational purpose without the approval of the National Park Service (NPS) and identification of a replacement property that is of equal to or better fair market value (FMV) and recreational usefulness in comparison to the converted property.

Methodology

Recreational properties were identified through review of the CDOT OTIS database, the Adams County Advanced Web Map, the Commerce City Park, Trail, Open Space, and Recreation Map and Guide, and site visits within a half-mile of the study area. Pursuant to 23 CFR 774.11, identified properties are presumed to be significant under Section 4(f) unless the official having jurisdiction over the property concludes that the entire property is not significant.

Existing Conditions

There are seven public parks and recreational areas that are adjacent to or within the vicinity of the project study area. The Veterans Memorial Park, Fairfax Park, Adams Heights Park, Pioneer Park, Commerce City Bikeway and Sand Creek Greenway Trail were determined to be



recreational Section 4(f) resources through review of local agency planning documents. The Veteran’s Memorial Park and Commerce City Bikeway were determined to be Section 6(f) resources through review of CDOT’s OTIS database.

Table 10: Section 4(f)/ Section 6(f) Properties

Property Name	Classification	Type	Conclusion
Veterans Memorial Park	Section 4(f) and 6(f)	Community Park	Park Improvement
Fairfax Park	Section 4(f)	Community Park	No Use
Adams Heights Park	Section 4(f)	Neighborhood Park	No Use
Pioneer Park	Section 4(f)	Community Park	No Use
Commerce City Bikeway	Section 4(f) and 6(f)	Trail	No Use
Sand Creek Greenway and Trail	Section 4(f)	Trail	No Use
Highway 2 Multi-Use Path	Section 4(f)	Multi-Use Path	No Use

Veterans Memorial Park is located at 6015 Forest Drive in Commerce City, Colorado. Veterans Memorial Park is approximately 2.6 acres located between Parkway Drive and East 60th Avenue and is adjacent to the project study area along Parkway Drive. Eagle Pointe Recreation Center is included on the property. The property and associated facilities are owned by Commerce City. Outdoor features include barbeque pits, picnic areas, a playground and public restrooms. According to the CDOT OTIS database, Veterans Memorial Park is a LWCF project and qualifies as a Section 6(f) resource, however the entire parcel is not encumbered.

Fairfax Park is located at 6850 Fairfax Drive in Commerce City, Colorado, off of 69th Avenue and Highway 85. The project study area is adjacent to the park along Fairfax Drive and the Union Pacific Railroad. Fairfax Park is 23 acres in size and is the second largest park in Commerce City. Amenities include sport courts, multipurpose fields, a playground, parking lots, and special event rentals. Fairfax Park is owned by Commerce City and qualifies as a Section 4(f) resource.

Adams Heights Park is located at 6625 Brighton Boulevard in Commerce City, Colorado. The park is approximately 0.75 acre and offers an outdoor recreation area and a playground. The park is approximately 800 feet west from the project study area. Adams Heights Park is owned by Commerce City and qualifies as a Section 4(f) resource.

Pioneer Park is located at 5950 Holly Street in Commerce City, Colorado, adjacent to East 60th Avenue between Holly Street and Monaco Street. The park is 37 acres and is a half-mile east from the project study area. Amenities include four baseball field, batting cages, a skate park, picnic areas, walking trails and a water park. Pioneer Park is owned by Commerce City and qualifies as a Section 4(f) resource.



Commerce City Bikeway runs along the southern border of Fairfax Park for 0.35 mile connecting 69th Ave to 67th Place. The Commerce City Bikeway is adjacent to the northern portion of the project study area to the east. This Bikeway connects major bike routes throughout Commerce City. According to CDOT's OTIS database, this section of the bikeway is a LWCF project and qualifies as a Section 6(f) resource.

Sand Creek Greenway and Trail is a regional bikeway that runs east to west throughout Commerce City. The trail is 900 feet south from the project study area adjacent to I-270. Known as the "wilderness in the city", the greenway is a protected public area and home to various wildlife. To access the Greenway and Trail, the Dahlia Trailhead is located on the corner of E 56th Ave and Sandcreek Drive near the southeast corner of the project study area. The Greenway is owned by Commerce City and CDOT and qualifies as a Section 4(f) resource.

Highway 2 Multi-Use Path is a hard surface path that runs parallel to Highway 2 along the south side of the roadway. The path begins at the intersection of 64th Avenue and Highway 2 and runs for 2.6 miles, until connecting to the Perimeter Trail, and continues for another 5.2 miles along Highway 2. Perimeter Trail connects to multiple other trails around Rocky Mountain Arsenal. Sand Creek Greenway Trail is also accessible through the Rocky Mountain Arsenal near Perimeter Trail. The Highway 2 Multi-Use Path assists in connecting Perimeter Trail to other trail systems around Denver and the City of Commerce City. The Multi-Use Path is owned by Commerce City and qualifies as a Section 4(f) resource.

Impacts

No Action

The No Action would not have any permanent or temporary impacts to Section 4(f) or Section 6(f) properties. Many pedestrians and vehicle users avoid the Vasquez Boulevard/60th Avenue intersection due to the substantial delays, congestion, safety concerns and local street accessibility. Currently, there are no other planned transportation projects to add safety improvements or operational improvements along Vasquez Boulevard. With the rise of residential use in the area, the desire for safe and easy access to recreational facilities will be increased. The increase of residential use will increase the need for appropriate access of recreational facilities along Vasquez Boulevard.

Proposed Action

The Proposed Action is anticipated to provide a construction enhancement to the Veterans Memorial Park near the intersection of Parkway Drive and Forest Drive. To accommodate for ADA compliance and sidewalk improvements, a maximum of 78 square feet of vegetated area will be paved and converted to sidewalk to add additional width around the corner. 180 square feet of temporary construction impacts to the grassy area at the back of the sidewalk are anticipated. The work will be within the road ROW, but the LWCF boundary also encompasses a portion of the road ROW. Due to the proposed work being within the LWCF boundary, this constitutes as a Section 6(f) impact. The impacts would not occur within the legal park boundary and therefore does not constitute as a Section 4(f) impact. Access to the park would be maintained throughout construction.

Early coordination with CPW occurred in April 2023 (Attachment C). The impacts to the Section 6(f) boundary associated with the Proposed Action would likely be considered a park improvement and would not trigger a conversion of use. Therefore, NPS coordination would likely not be required. However, formal outreach to CPW would need to occur during the design phase to receive their final determination.

60th Avenue is the main access to Pioneer Park for users traveling east from Vasquez Boulevard. During construction there may be delays or a detour around east 60th Avenue as the intersection would be under construction. This could create delays for users traveling to Pioneer Park, but the park property would not be impacted, and all accesses would remain open during construction.

The Highway 2 Multi-Use Path will not be impacted during construction, as the start of the path is not adjacent to the proposed project improvements. The southern most access to the path may be temporarily detoured during construction on Highway 2 and the intersection of 62nd Avenue and Vasquez Boulevard.

Mitigation

No permanent 4(f) impacts are anticipated as part of the proposed action. Formal outreach to CPW to receive their final determination for Section 6(f) impacts to Veterans Memorial Park must be obtained prior to construction. All park access would remain open during construction.



Figure 13: Recreational Resources near the Project Study Area



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Attachment A.

Project Information





ATTACHMENT A:

Project Information

June 2023

Project Number: NHPP 006A-06

Subaccount number: 22922

Introduction and Background

The Vasquez Boulevard (United States Route 6 [US 6]) I-270 to 64th Avenue project (Project) is located within the limits of the City of Commerce City (Commerce City) in Adams County. The Colorado Department of Transportation (CDOT), in cooperation with the Federal Highway Administration (FHWA) and local agencies including Adams County, the City of Commerce City, City and County of Denver, Denver Regional Council of Governments (DRCOG) and the Regional Transportation District (RTD), conducted a Planning and Environmental Linkages (PEL) study in 2018. The Vasquez Boulevard PEL study provided a framework for the implementation of transportation improvements along the corridor between 52nd Avenue and 64th Avenue and along I-270 for a ½-mile north and south of the I-270/Vasquez Boulevard interchange. The Project falls within the limits of the PEL study and is now following the NEPA process to prepare an Environmental Assessment to identify a preferred alternative based on the needs identified in the PEL.

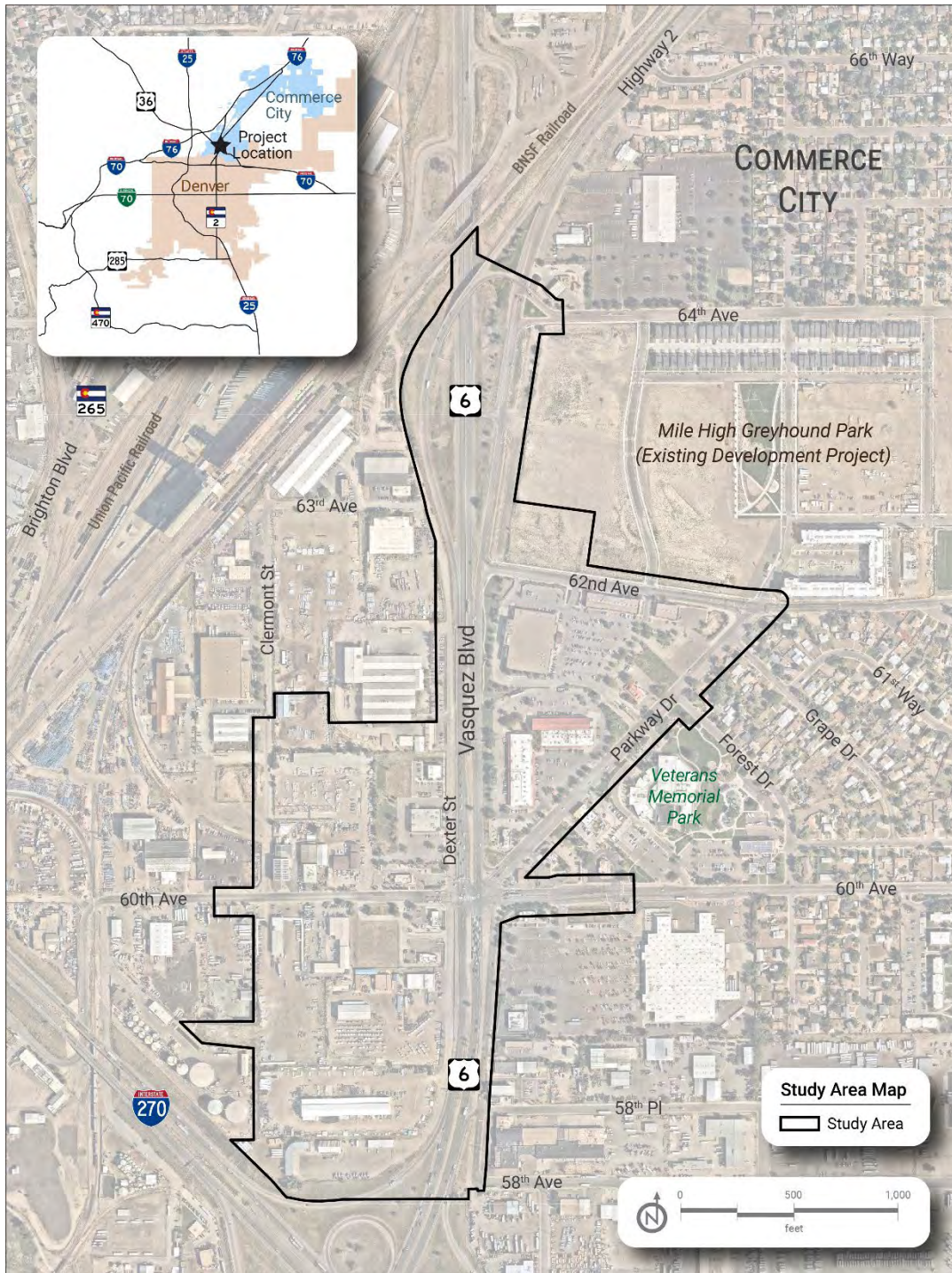
The PEL study identified long-term transportation improvements and evaluated potential projects that could be implemented with available funding as near-term improvements. Potential near-term improvements were identified to improve operations, safety, and connectivity along Vasquez Boulevard, focusing on the Vasquez Boulevard/60th Avenue and Vasquez Boulevard/62nd Avenue intersections. Transportation Improvement Program (TIP) funding, state funding and other sources were obtained for this current Project to construct these near-term improvements along Vasquez Boulevard.

Study Area

The study area extends along Vasquez Boulevard from 58th Avenue (just north of the I-270 interchange) north to the BNSF Railroad bridge. West of Vasquez Boulevard, the study area extends to Clermont Street, between the on-ramp to I-270 and just north of 60th Avenue. East of Vasquez Boulevard, the study area includes Parkway Drive, 60th Avenue and 62nd Avenue. The study area also includes proposed drainage work to an existing water quality pond within the Mile High Greyhound Park (MHGP) property at the corner of 62nd Avenue and Highway 2. Some environmental resources evaluated for the NEPA process may have a slightly different study area depending on specific resource requirements.



Figure 1: Project Study Area





Purpose and Need

The purpose of the Vasquez Boulevard I-270 to 64th Avenue Project is to address the following needs:

- improve operations for vehicles and freight;
- improve safety;
- improve multimodal connections.

Proposed Action

The Proposed Action includes improvements at the Vasquez Boulevard/60th and Vasquez Boulevard/62nd intersections, as well as the local street network and multimodal facilities, as shown in [Figure 2](#).

Vasquez Boulevard/60th Avenue

The Proposed Action includes the elements listed below for the Vasquez Boulevard/60th Avenue intersection:

- Only right turn movements to northbound Vasquez Boulevard from Parkway Drive. No access to other roads.
 - All inbound movements to Parkway Drive remain open as they exist now.
- All inbound movements from Vasquez Boulevard/60th to frontage roads remain as they exist now, but outbound movements are restricted.
 - Right turn only from southeast frontage road and all in movements allowed (all movements remain as they exist)
 - Right turn only from northwest frontage road and all in movements allowed (in movements remain as they exist)
 - No movement out from southwest frontage road and all in movements allowed (in movements remain as they exist)
- Two new local road connections to Clermont Street west of Vasquez Boulevard provide full access between frontage roads and 60th Avenue.
- Driveways on 60th Avenue, Parkway Drive and frontage roads remain as currently structures or have minor changes
- Restriping of existing crosswalks and new pedestrian refuges improve safety and accessibility of pedestrian infrastructure
- Corner curb bulb-outs would be added at the Parkway/Forest intersection as a deterrent to drivers who may think Forest Drive is an alternate route to 60th Avenue. The bulb-outs and crosswalk will provide visual indication of Forest Drive as a neighborhood street.



Vasquez Boulevard/62nd Avenue

The Proposed Action includes the elements listed below for the Vasquez Boulevard/62nd intersection:

- New traffic signal required at 62nd Avenue with the Vasquez Boulevard/60th Avenue intersection improvements to provide movements restricted from Parkway Drive to Vasquez Boulevard.
- Traffic signal provides full access to/from 62nd Avenue and Vasquez Boulevard/Highway 2.
- Southbound Highway 2 off ramp remains in existing configuration.
- Southbound traffic on Vasquez Boulevard and the Highway 2 off ramp have continuous green time without stopping at the signal for 62nd Avenue traffic.

Vasquez Boulevard Improvements

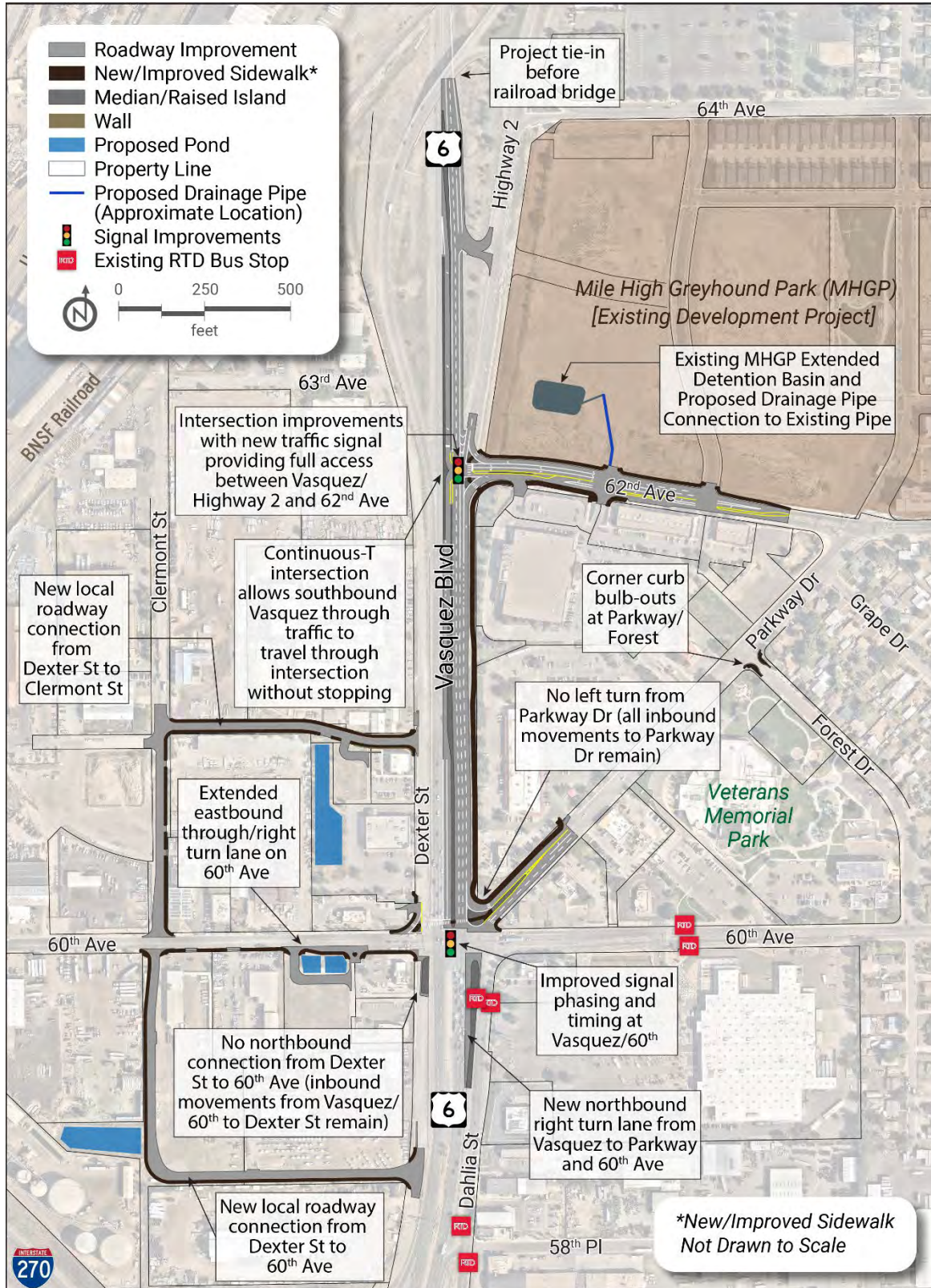
In addition to the improvements at the Vasquez Boulevard/60th Avenue and 62nd Avenue intersections, a portion of Vasquez Boulevard will be reconstructed. The southbound lanes of Vasquez Boulevard will remain as they currently exist (12-foot travel lanes; roadway width varies from 24-feet to 60-feet). Northbound Vasquez Boulevard will be widened a maximum of two feet between 60th Avenue and 62nd Avenue and a maximum of 20 feet north of 62nd Avenue, and the existing median will be modified to add left turn lanes into and out of the new 62nd Avenue intersection. A 10-foot detached multi-use path will be constructed along the eastern side of Vasquez Boulevard, between 60th Avenue and 62nd Avenue.

Local Road Connections

New local roadway connections west of Vasquez Boulevard are part of the Project to enhance the local circulation and pedestrian and bicyclist connectivity of the local street network. The new roadways are two-lane, two-way local roads with the potential for direct property driveway access as approved by Commerce City.



Figure 2: Proposed Action



Attachment B.

Photograph Log





Photo 1: View of commercial properties on Vasquez Boulevard near 60th Avenue intersection facing southwest.



Photo 2: View of commercial properties on Vasquez Boulevard near 60th Avenue intersection facing north.



Photo 3: View of the 69th Avenue intersection on Vasquez Boulevard facing north.



Photo 4: View of industrial properties on Vasquez Boulevard near 69th Avenue facing west.



Photo 5: View of the railroad bridge and pedestrian walking area on Vasquez Boulevard facing north.



Photo 6: View of the railroad bridge and pedestrian walking area on Vasquez Boulevard facing south.



Photo 7: View of an industrial property on Vasquez Boulevard facing west at the corner of the north E 64th Ave off-ramp intersection.

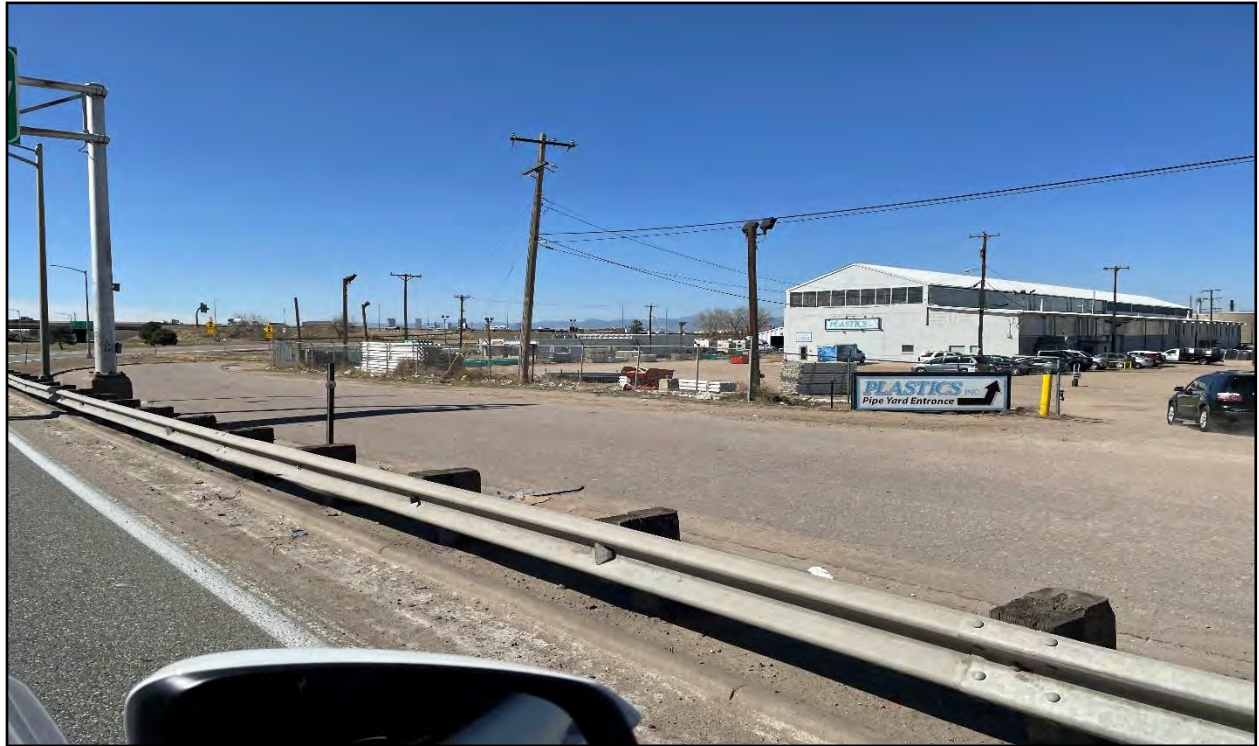


Photo 8: View of the Plastics Inc. industrial property from Vasquez Boulevard facing southwest near the on-ramp to I-270.



Photo 9: View of a RTD bus stop on E 60th Ave near the Walmart Supercenter property facing east.



Photo 10: View of the Parkway Drive and E 62nd Ave intersection from Parkway Drive facing northeast.



Photo 11: View of E 60th Ave at the Hudson Street intersection facing west.



Photo 12: View of the Adams County School District Educational Support Services building on E 60th Ave facing northeast.



Photo 13: View of the Eagle Point Recreation Center from E 60th Ave facing north.



Photo 14: View of Veterans Memorial Park from Parkway Drive facing southeast.



Photo 15: View of the end of a bike route on Parkway Drive facing southwest near the entrance into the commercial complex “Commerce City Plaza”.



Photo 16: View of the Commerce City Plaza from the King Soopers parking area facing northwest.



Photo 17: View of the Mile High Greyhound Park development from Parkway Drive at the E 62nd Ave intersection facing northeast.



Photo 18: View of the Mile High Greyhound Park development from Parkway Drive at the E 62nd Ave intersection facing north.



Photo 19: View of the Mile High Greyhound Park development and industrial properties from E 62nd Ave facing west.

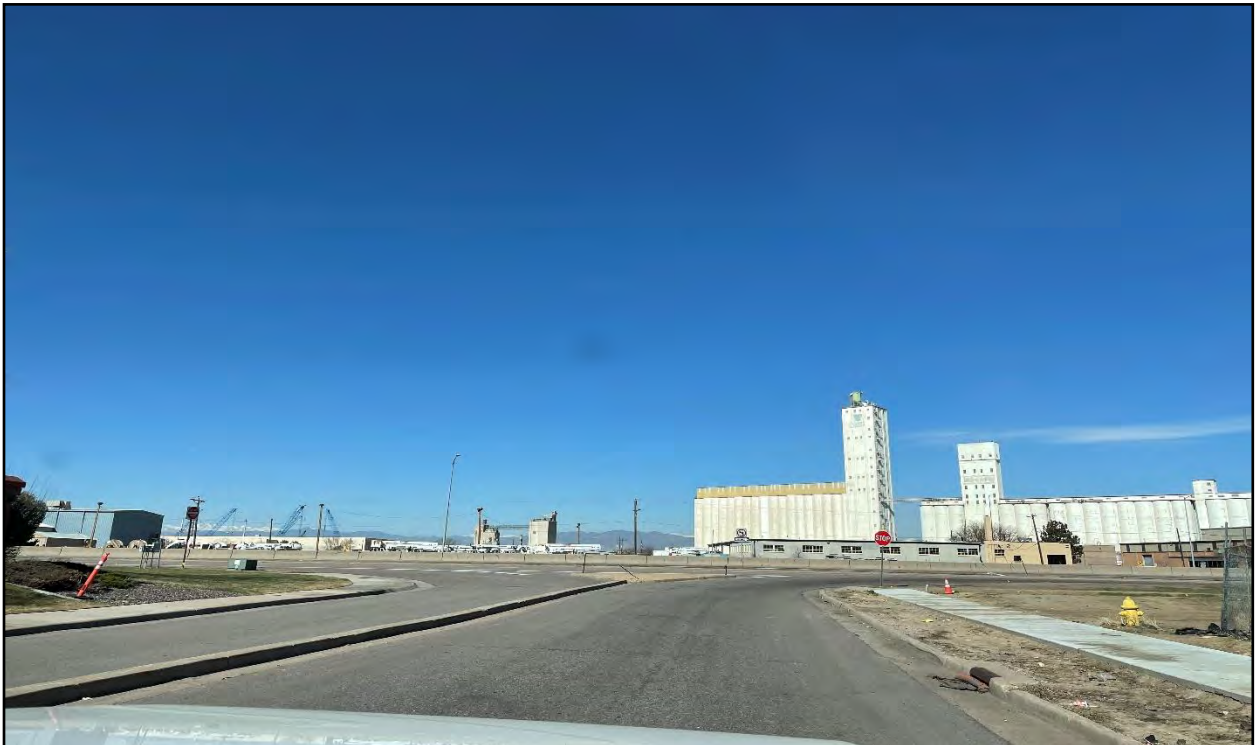


Photo 20: View of the E 62nd Ave, Vasquez Boulevard, and Highway 2 intersection from E 62nd Ave facing west.



Photo 21: View of a used pedestrian path along the Mile High Greyhound Park development adjacent to Highway 2 from the E 62nd Ave intersection facing north.



Photo 22: View of the Mile High Greyhound Park development from Highway 2 facing east.



Photo 23: View of the Impacto de Fe church on E 64th Ave facing north.



Photo 24: View of the duplex and single-family homes in the Mile High Greyhound Park from E 64th Ave facing southeast.



Photo 25: View of commercial retail property with signage in English and Spanish on E 64th Ave near Holly Street facing south.



Photo 26: View of the commercial complex, "Plaza Mexico", on E 64th Ave facing south.



Photo 27: View of affordable housing, “Prairie Rose Plaza”, on Kearny Street near the E 62nd Ave intersection facing west.



Photo 28: View of the Suncor Boys and Girls club on the corner of E 62nd and Holly Street facing north.



Photo 29: View of the water park area within Pioneer Park parking area facing north.



Photo 30: View of the baseball fields and picnic area within Pioneer Park parking area facing north.



Photo 31: View of the industrial properties on E 60th Ave facing north.



Photo 32: View of the industrial and commercial properties on E 60th Ave facing west.

Attachment C.

CPW Coordination



----- Forwarded message -----

From: **Read - DNR, Chrystal** <chrystal.read@state.co.us>

Date: Tue, Apr 4, 2023 at 9:09 AM

Subject: Re: Vasquez Blvd Project - Veteran's Memorial Park

To: McCall - CDOT, Veronica <veronica.mccall@state.co.us>

Cc: Jacobs - DNR, Fletcher <fletcher.jacobs@state.co.us>

Hi Veronica

Thanks for the background. It looks like this will cause very minimal permanent impact on the property and given it will increase pedestrian safety, it will likely be considered a park improvement (pending more firm design plans). No NPS coordination is required for park improvement requests as CPW makes this determination.

Keep us updated as the design progresses and if nothing significant changes, we can likely turn a determination around relatively quickly.

Best,

Chrystal Read
Federal Grants Administrator



P [303.791.1957](tel:303.791.1957) ext. 4150
13787 South Hwy 85, Littleton, CO 80125
chrystal.read@state.co.us | cpw.state.co.us

On Wed, Mar 29, 2023 at 3:56 PM McCall - CDOT, Veronica <veronica.mccall@state.co.us> wrote:

Hi Chrystal,

I'm reaching out about a proposed impact to the NE corner of Veteran's Memorial Park at Parkway Blvd and Forest Drive. This would be part of CDOT's Vasquez Blvd (I-270 to 64th Avenue) Project which is largely proposing operational and safety improvements at the intersections of Vasquez Blvd/60th Avenue and Vasquez Blvd/62nd Avenue. We are currently conducting an EA.

As shown in the attachment, the project would install a flared ADA curb ramp and widen the sidewalk to enhance pedestrian safety. This would result in a permanent impact to the grassy area, within the LWCF boundary. Design is still preliminary, so the figure accounts for the max impact footprint to cover any adjustments that could happen during final design. This work actually does not require any ROW acquisition or easements as survey determined the work to be outside of the legal park boundary and within roadway ROW, though it is within the LWCF boundary which differs from the legal park boundary.

As part of the EA we are working to document impacts, mitigation, and agency coordination. I've anticipated that you'll need at least 30% design plans to provide an official determination and that we would commit to follow up with these following the EA. However, I was hoping you could provide an initial determination on the level of 6(f) impact and whether you anticipate NPS coordination to be required. I don't think we can determine duration of occupancy at this early stage but I don't believe it would be a problem to commit to staying under 6 months given the minor nature of the work.

Please let me know if you have any questions or need additional information.


Thank you,
Veronica



Veronica McCall
Environmental Project Manager & Section 4(f)/Section 6(f) Specialist
Region 1 Planning & Environmental

Office: 303.757.9926 | Mobile: 801.529.4150
2829 W. Howard Place, Denver CO 80204
veronica.mccall@state.co.us | codot.gov | cotrip.org



- Proposed Roadway Design
- - - Existing Right-of-Way
-  Section 6(f) Property

78 sf permanent impact to grassy area on corner.

Parkway Dr

Forest Dr

180 sf max temporary impact to grassy area at back of sidewalk.

Veterans
Memorial Park