

Appendix C15.

Cumulative Resources





C15. Cumulative Impacts 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

Legislation

Cumulative impacts are considered in the National Environmental Policy Act (NEPA) planning process at the direction of the Council on Environmental Quality. In 40 Code of Federal Regulations 1500-1508, the Council on Environmental Quality (CEQ) defines cumulative impacts as “[t]he impacts on the environment which results from the incremental impact of the [proposed] action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time” (CEQ, 1978).

In July of 2020, the CEQ issued a final rule significantly revising the procedures federal agencies must follow under NEPA. The new definition simplifies the definition of cumulative effects to focus on effects that are reasonably foreseeable and have a reasonably close causal relationship to the proposed action.

Methodology

Environmental impacts of past, present and reasonably foreseeable future actions were considered to determine whether cumulative impacts would occur with the implementation of the proposed action alternative. FHWA and CDOT guidance on addressing cumulative impacts suggests to focus on resources that are relevant and important to the project location and surrounding areas. Resources evaluated as part of this analysis were identified based on the potential cumulative impacts that may result from the impact of the Proposed Action with other reasonably and feasible foreseeable future actions. The resources evaluated for cumulative impacts were socioeconomic, water quality and hazardous materials and confirmed per the Cumulative Methodology Memo.



Within the Cumulative Methodology Memo, socioeconomic resources were listed as a potential to have cumulative impacts on the resource. It was decided that it would be better to study the potential impacts on the Environmental Justice and Disproportionately Impacted Communities. This resource will now be discussed as part of the cumulative impacts analysis.

Spatial and Temporal Boundaries

The time period considered to evaluate cumulative impacts of the Proposed Action is between 1950 and 2050. The year 1950 was identified as when the surrounding communities' development trends started to transition from agriculture and residential to commercial and industrial. Commerce City was incorporated in 1952, which makes it a relatively new city in the Denver Metropolitan area. The 2050 end date was chosen as it is the current transportation and transit planning year cut-off, and the Commerce City Comprehensive Plan includes years planned from 2030 and later.

Three Cumulative Impacts Assessment Study Areas have been developed to assess the cumulative impacts of the Proposed Action for each identified resource. The decision to develop different multiple study areas was to tailor each resource's review to how it would potentially impact the surrounding area. The Hazardous Materials Study Area ([Figure 1](#)) was evaluated within the project study area used to assess all resources for the NEPA document, as the project will not be impacting properties outside of those boundaries. The Water Quality Cumulative Study Area ([Figure 2](#)) was developed based on the watershed boundaries in the areas and the movement of water from the study area. The Social Resources Study Area is comprised of the neighborhoods that surround the project study area to focus on how the impacts have potential to influence the personal use and patterns of the area ([Figure 3](#)).

PEL Study Summary

A Planning and Environmental Linkages Study (PEL) was prepared to identify transportation issues and environmental concerns throughout the Vasquez/I-270 corridor from Highway 2 through 52nd Avenue. PEL Studies can be used to make planning decisions for future projects by identifying potential concerns and projects with a range of alternatives to consider. The alternatives can then be prioritized for future implementation of projects. The PEL was prepared in 2018 by a blended team of FHWA, CDOT, CH2M, Atkins, Apex Design, Calderon Advertising and Public Relations and Pay Noyes & Associates. The document was approved by FHWA and many regulatory agencies within the area (CDOT, Adams County, City and County of Denver and City of Commerce City). Cumulative impacts were not considered during the PEL as they were to be considered during a future NEPA process; however, an environmental scan was prepared as part of the study. Key resources with potential to be impacted and resources with limited to no potential to be impacted were discussed in the environmental scan. Water quality, hazardous materials and socioeconomic conditions were a few of the resources identified in the environmental scan that have a potential to be impacted for future projects.



Figure 1: Hazardous Materials Study Area

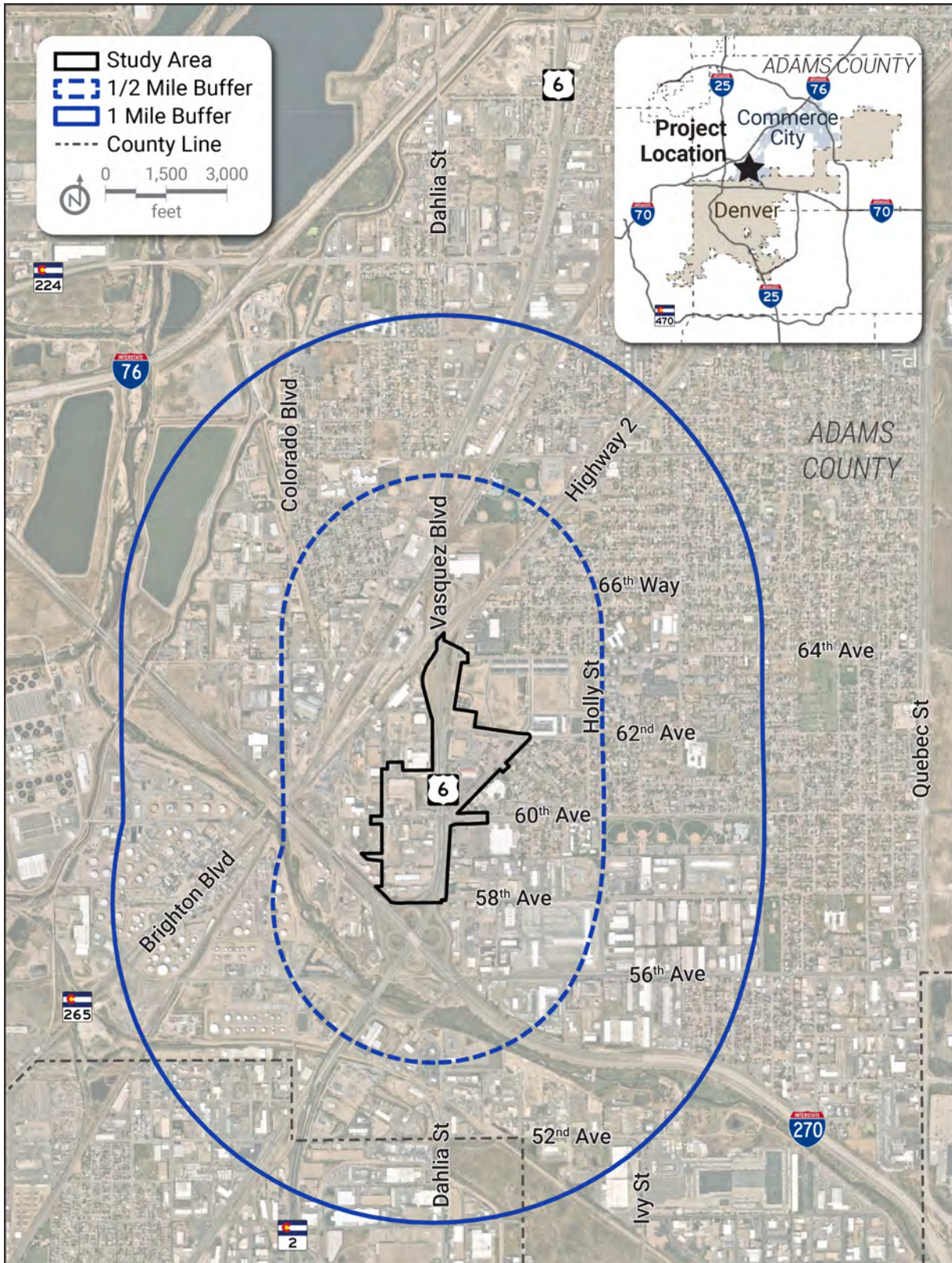




Figure 2: Water Quality Study Area

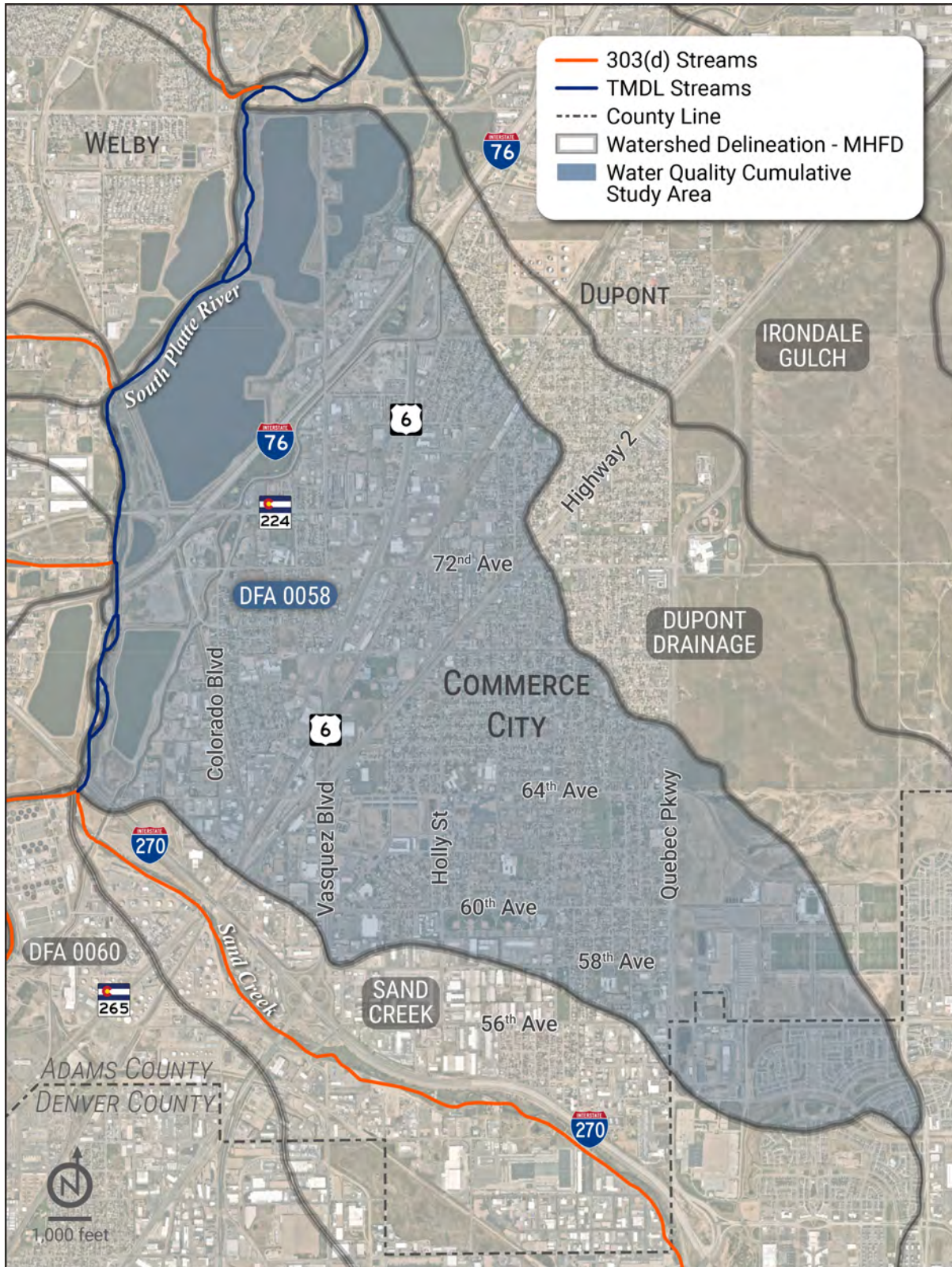
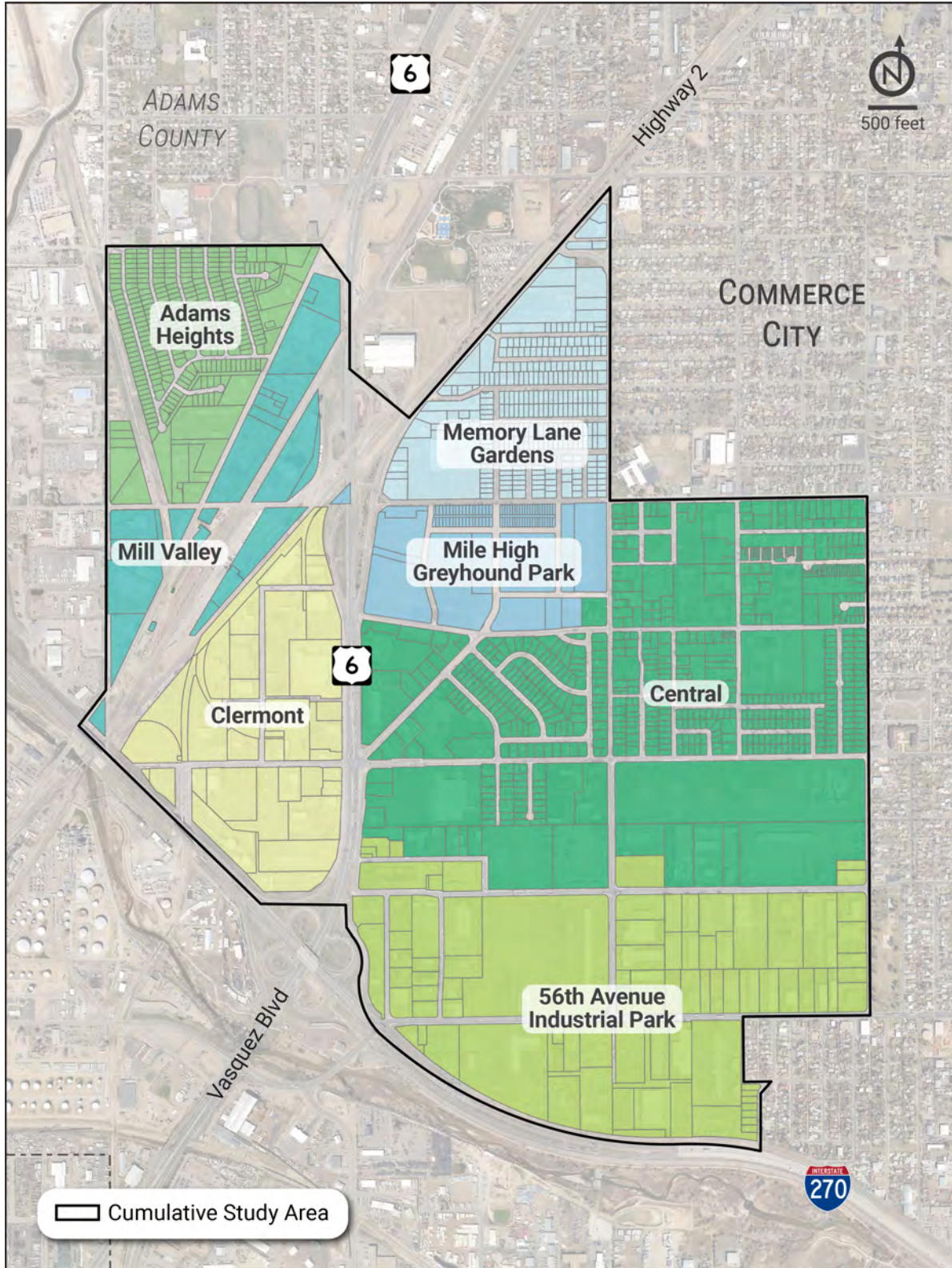




Figure 3: Social Resources Study Area





Past, Present and Reasonably Foreseeable Future Actions

Past Actions

Before the 1950s, the area around Vasquez Boulevard was mostly agricultural, with industrial properties adjacent to the railroad. During the 1950s, the development of the agricultural land in the area then turned to industrial with residential properties increasing to the east. The City of Commerce City was officially incorporated in 1952 as the area became more developed. In the late 1960s to early 1970s, the completion of I-270 increased the travel to the area, then bringing in more commercial, industrial, and residential development along and near Vasquez Boulevard. From the 1980s to the 2000s, the area continued to become more developed with industrial and commercial properties.

To assist in the growth of the area, the City of Commerce City has created a Comprehensive Plan, adapted in 2010 and updated in 2022, to set the community's vision, goals and policies. This Plan is to help guide development and investment decisions for short- and long-term development regulations, ongoing decision making, program funding and capital investments. It also provides a basis for coordination among all of Commerce City's detailed plans, implementation programs, systems and services.

The Vasquez Boulevard Planning and Environmental Linkages (PEL) Study was completed by the Colorado Department of Transportation in 2018. This Study looked at the Vasquez Boulevard/I-270 interchange, and Vasquez Boulevard between 52nd Avenue and 64th Avenue. This study was a cooperative effort from CDOT, FHWA, Commerce City, Adams County, and the City and County of Denver. The Study identified improvements that consider long-term transportation needs such as: capacity, safety, access, connectivity, transit, pedestrian and bicyclist needs. Improvements from the Proposed Action were developed during the PEL Study as solutions to move forward to construction.

Present and Reasonably Foreseeable Future Actions

The CDOT I-270 Corridor Improvements Environmental Assessment (EA) has been developing since early 2020. The study is planned to be completed by the end of 2023 with a decision document being finalized early 2024. The I-270 EA study area ranges from I-25 through the I-70 intersection of I-270. The I-270 project is aiming to modernize the corridor to accommodate the increase in transportation demands. The Vasquez Boulevard NEPA and Design project study area intersects with the I-270 EA project study area. Both projects are aiming to accommodate the increase in transportation demands, which will aid in the transportation to key industry clusters and growing residential neighborhoods.

The Commerce City Comprehensive Plan is currently undergoing an update to extend through 2045. This Plan aims to assist residents to help envision the next 25 years of the City's future to direct future growth and development. The updated plan will accurately reflect the changing priorities, values and goals for the City's future. Multiple community workshops, meetings, surveys and other opportunities have been and will be available for residents to become involved.



The updated Comprehensive Plan will address:

- land use and development;
- framework plans for residential, commercial and industrial areas;
- transportation and mobility;
- public facilities and infrastructure;
- cultural facilities and tourism;
- appearance and design;
- parks, open space and recreation;
- fiscal stability and economic development;
- safety and resiliency;
- homelessness; and
- health and community wellness.

The former Mile High Greyhound Park site is currently being redeveloped into a mixed-use area within the project study area. The land is to be residential, retail/commercial, open space and multicultural/educational uses. With the property previously being abandoned after the Greyhound Race facility was shut down, the property is poised to help revitalize the area and regain its place as an important community hub. Construction is currently underway with ongoing progress. The site could eventually create over 1000 permanent employees while generating \$65 million in income on an annual basis. The site is hoping to create a sense of community by providing space for the nearby Boys & Girls Club and other service organizations and a mixed-use multi-use neighborhood. The new housing will be income-restricted with options to rent, rent to buy, or purchase apartments, townhomes and single-family homes.

The City of Commerce City's Urban Renewal website also mentions a City Plaza/Parkway Market shopping center project at E 62nd Avenue and Parkway Drive, which is within the project study area. No additional information on the anticipated project improvements was available at the time of this study.

Cumulative Impact Assessment

No Action

The No Action alternative would leave Vasquez Boulevard as it currently is configured and operating. There would not be any proposed improvements, beyond the typical maintenance activities. Without these improvements, there will still be a lack of water quality facilities and safe pedestrian transportation in the area.



Proposed Action

Water Quality

Water quality has been reduced as development and transportation uses increased within the study area. Direct discharges and stormwater runoff to the South Platte River and Sand Creek reduces the water quality downstream. Historically, runoff volumes rise as the increase of impervious surface from growth of industrial, commercial, residential and transportation use rises.

Implementation of the Proposed Action ([Figure 2](#)) will result in an increase of impervious area. Pollutants are generated by vehicle traffic along the roadway and the increase in impervious surface concentrate the pollutants and transport them in stormwater runoff. The anticipated increase in the impervious surface will increase the runoff which results in degradation of water quality to the surrounding watersheds. Construction impacts are also anticipated which could also reduce the water quality in the area. The Proposed Action is identifying three potential facilities to provide required permanent water quality control measures in the area. Implementation of the facilities would provide an increase in water quality since there is a potential of the installment of two new infiltration basins and a water quality detention pond. There is currently no existing storm drain systems in the area of the proposed new impervious surface, and infiltration options are limited.

The construction of the Proposed Action and Mile High Greyhound Park site will increase the impervious surface in the area when being added to the existing development. The Proposed Action will comply with federal, state and local stormwater regulations. Compliance will provide a positive effect on the treatment of runoff within the study area, resulting in an improvement compared to the existing conditions. The Proposed Action is expected to contribute to improving water quality in the study area.

Hazardous Materials

The historical land use within the project study area ([Figure 1](#)) was previously agricultural until the 1950s when it shifted to commercial/industrial. The Union Pacific Railroad and BNSF Railroad line has been operating through the project area since before 1937, which is the earliest aerial photographs that are available. Railroads are historically known for carrying a risk of containing hazardous material near the property with associated material uses. Since the 1950s, the project study area has primarily been used for residential and commercial use to the east, and commercial and industrial use to the west.

A hazardous materials environmental site assessment was conducted for the Proposed Action project study area. The assessment identified numerous sites in and adjoining the project area that are known areas containing hazardous materials. Recognized Environmental Conditions (RECs), Controlled Recognized Environmental Conditions (CRECs) and Potential Environmental Condition (PECs) sites were identified with low to high risk. These properties contain Aboveground or Underground Storage Tanks (AST/USTs), Leaking Underground Storage Tanks (LUSTs), listed and delisted National Priority List properties, historic solid



waste/landfill facilities, or Resource Conservation and Recovery Act (RCRA) sites. With the extensive amount of commercial and industrial use of the properties in the area, there is a risk of encountering potentially contaminated properties during construction.

Although the Proposed Action has potential to contact contaminated materials within the project study area, the appropriate mitigation measures to clean up the materials based on EPA standards will be required by NEPA. The Proposed Action is not anticipated to introduce additional hazardous materials within the project area, so cumulative hazardous material impacts are not anticipated.

Environmental Justice and Equity

At-risk populations in the study area have been impacted by transportation projects and other re-development activities. The impacts of these projects are positive by focusing on safety, mobility and multi-modal connectivity. The transportation and commercial/residential development in the area are aimed at focusing on the increase in travel demand and growth in the area. Vasquez Boulevard has created a barrier effect throughout the study area by creating a divide and isolating between commercial properties and residential neighborhoods ([Figure 3](#)). Previously, transportation projects and industrial development have negatively impacted residential communities in the area. Acquisition of right-of-way from environmental justice populations, higher noise levels due to increase in freight traffic, increased impervious surface, and reduced neighborhood cohesion has led to this area to be negatively impacted. The Proposed Action aims to counteract this effect on the surrounding neighborhoods by improving access to goods and services, improving non-motorized facilities and improving the overall safety and mobility of the area. This can link the neighborhoods with environmental justice populations to potential opportunities for employment, goods and services.

The project study area is within the Urban Renewal City Center boundary that identifies and establishes blighted areas for redevelopment. This is established by the Commerce City Urban Renewal Authority that is a public-private partnership, where the public investment is supported by tax increment financing while most of the project is funded by the private sector. This provides additional support in the planning and development process to focus on criteria established in the Urban Renewal Plan. The Mile High Greyhound Park development was established through the City Center Urban Renewal Plan. The Proposed Action will assist in the growth activities that the Urban Renewal Plan has previously identified by providing employment and safe pedestrian transportation opportunities.

The environmental justice populations in the neighboring communities have been negatively impacted by the increase in industrial properties and transportation facilities in the area. The Proposed Action would not contribute to this trend and would instead implement a positive impact by improved safety and mobility as well as increased multimodal connectivity.



References

"City of Commerce City, CO" Urban Renewal
<https://www.c3gov.com/government/urban-renewal>

"City of Commerce City, CO." Comprehensive Plan
<https://www.c3gov.com/government/city-charter-master-plans/comprehensive-plan>.

"City of Commerce City, CO." Mile High Greyhound Park,
<https://www.c3gov.com/government/urban-renewal/mile-high-greyhound-park>.

"I-270 Corridor Improvements." Colorado Department of Transportation, 5 Apr. 2022,
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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.

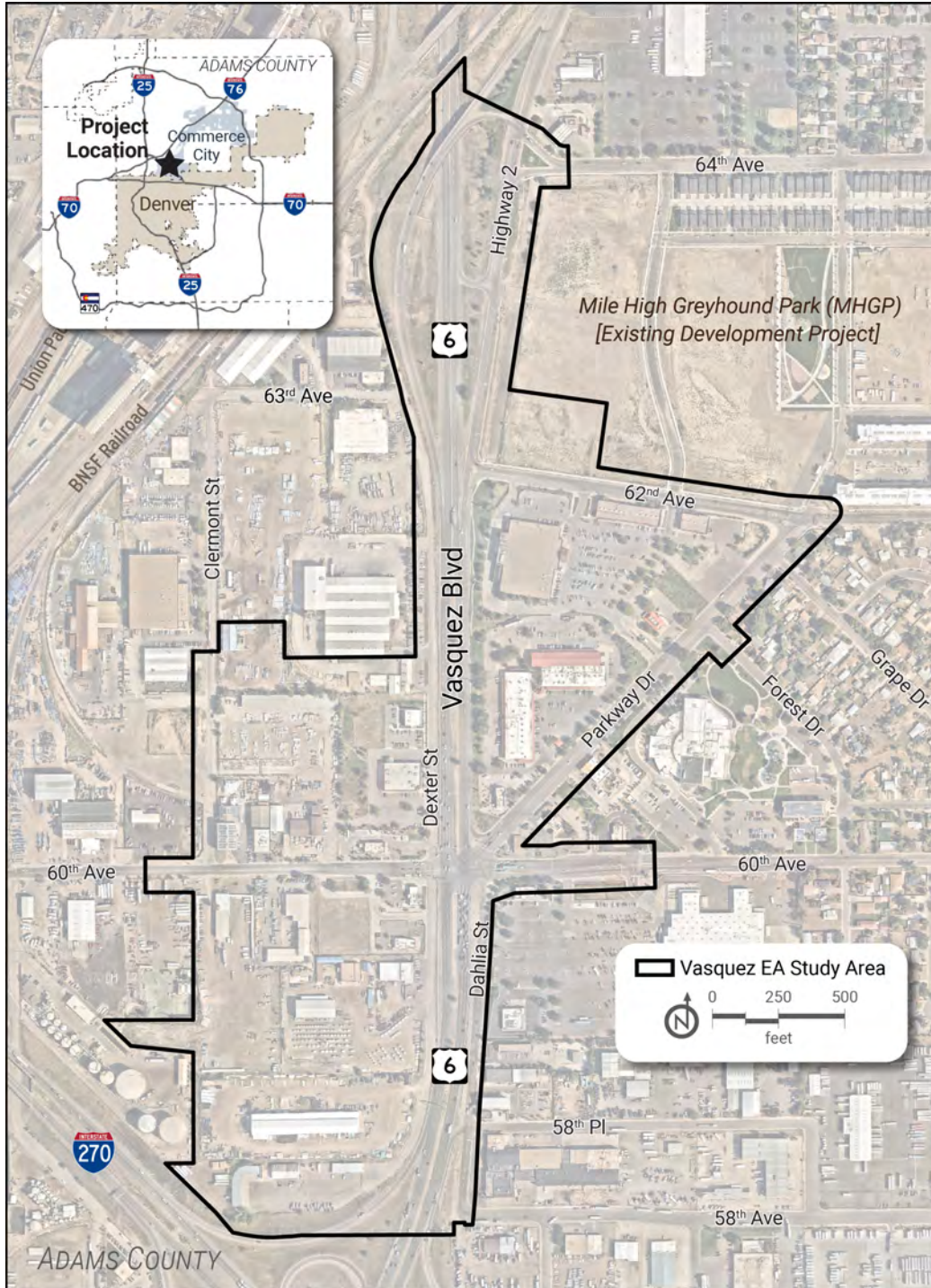
The PEL study identified long-term transportation improvements and evaluated potential projects that could be implemented with available funding as near-term improvements. Potential near-term improvements were identified to improve operations, safety, and connectivity along Vasquez Boulevard, focusing 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

