



E **88TH** AVE
8800 N

I-76 NB RAMPS TO HIGHWAY 2

COMMUNITY UNDERSTANDING TECHNICAL REPORT

May 2021

Prepared for:
City of Commerce City



ENVIRONMENTAL ASSESSMENT



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Acronyms and Abbreviations

ACS	American Community Survey
BNSF	BNSF Railway
CDOT	Colorado Department of Transportation
DRCOG	Denver Regional Council of Governments
EO	Executive Order
FHWA	Federal Highway Administration
HHS	U.S. Department of Health and Human Services
HUD	U.S. Department of Housing and Urban Development
I-25	Interstate 256
I-76	Interstate 76
LEP	limited English proficiency
NEPA	National Environmental Policy Act
PUD	planned unit development
RTD	Regional Transportation District
UPRR	Union Pacific Railroad
USDOT	U.S. Department of Transportation

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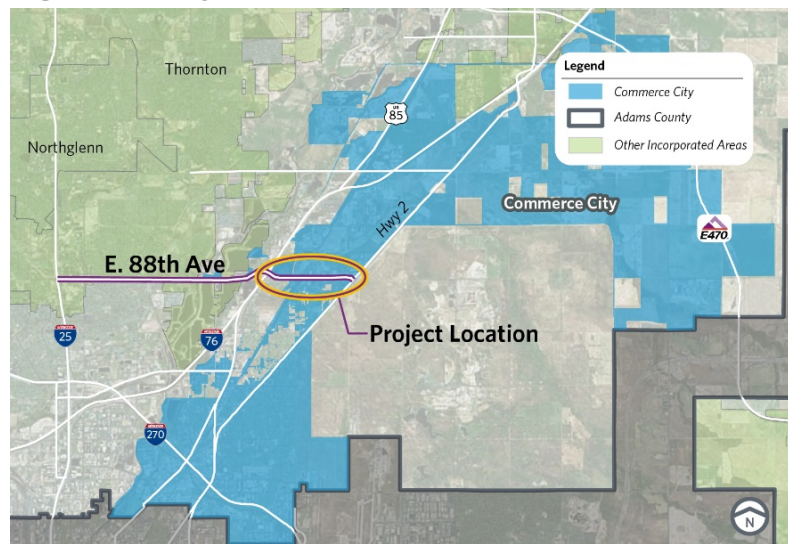
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1.0 INTRODUCTION

The City of Commerce City, in consultation with the Federal Highway Administration (FHWA) and the Colorado Department of Transportation (CDOT), is proposing to improve approximately 1.6 miles of East (E.) 88th Avenue between Interstate 76 (I-76) and Highway 2. In accordance with the National Environmental Policy Act of 1969 (NEPA) and its related regulations, an Environmental Assessment (EA) is being prepared for the E. 88th Avenue (I-76 to Highway 2) Project (project).

E. 88th Avenue is a continuous east-west roadway that runs through Adams County, Colorado, from Interstate 25 (I-25) to Highway 2 (Figure 1). The land uses along the corridor are residential, commercial, and industrial. The residential land uses primarily occur at the east and west ends of the project study limits. The Mile High Flea Market and 88 Drive-In Theatre commercial properties generate considerable event traffic, and the industrial properties generate heavy truck traffic. The project study area extends approximately north and south 200 to 700 feet

Figure 1. Project Location



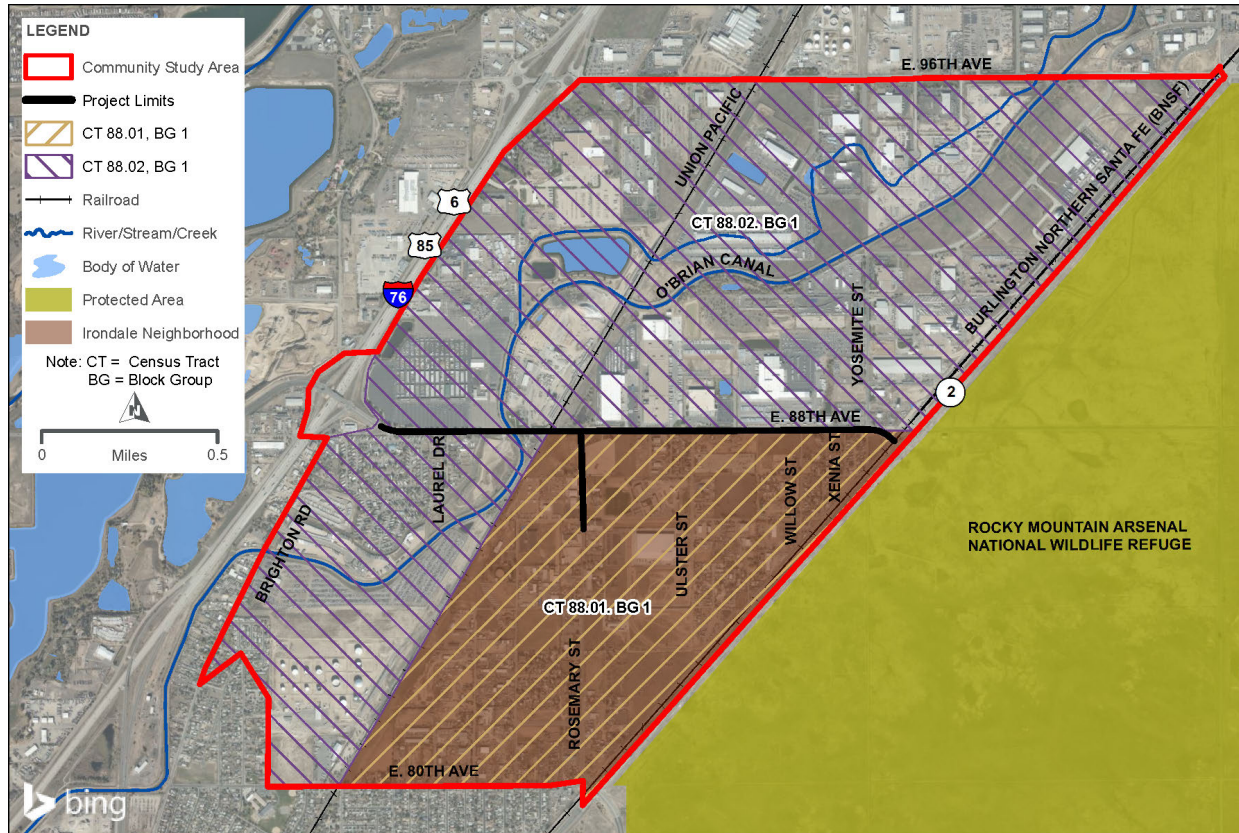
from the center of E. 88th Avenue, and approximately east and west 230 feet from the center of Rosemary Street and 650 feet south of E. 86th Avenue (Figure 2). Within the project study area, E. 88th Avenue crosses over the O'Brian Canal on a bridge, crosses a Union Pacific Railroad (UPRR) track at grade west of Rosemary Street, and crosses BNSF Railway (BNSF) tracks at grade west of Highway 2.

Commerce City's *C3 Vision Transportation Plan* (Commerce City, 2010a) describes E. 88th Avenue in the project study area as a minor arterial roadway designed to accommodate heavy trucks and other large vehicles. The *C3 Vision Comprehensive Plan* (Commerce City, 2010b) depicts future land use in the project study area as primarily industrial with some residential and a community commercial center located at the junction with I-76. The Comprehensive Plan describes future improvements at the I-76/E. 88th Avenue interchange, improved network connectivity with an extension of Yosemite Street, grade-separated railroad crossing of the Union Pacific Railroad (UPRR), improved recreational trail connections, and improved water and sewer infrastructure. Widening E. 88th Avenue and improvements at the UPRR crossing were identified as priority projects in Commerce City's *Irondale Neighborhood and Infrastructure Plan* (Commerce City, 2018), with partial funding identified in the *City of Commerce City 2019 Proposed Budget* (Commerce City, 2018). The project is also included in the current Denver Regional Council of Governments (DRCOG) *2040 Metro Vision Plan* (DRCOG, 2020).

This Community Understanding Technical Report was prepared in support of the *88th Avenue (I-76 to Highway 2) Environmental Assessment*. It describes the socioeconomic conditions and social resources in a defined community study area (Figure 2). It also describes the regulatory setting and the impacts of

the Proposed Action on minority, low-income, and limited English proficiency (LEP) populations in the community study area. The report includes an analysis of the impacts of the Proposed Action on social and economic resources, including an environmental justice analysis, and mitigation measures. It is prepared in accordance with Federal Highway Administration (FHWA) *Guidance on Environmental Justice and NEPA* (FHWA, 2011), U.S. Department of Transportation (USDOT) Environmental Justice Executive Order and the *CDOT NEPA Manual* (CDOT, 2020).

Figure 2. Community Resources Study Area



This technical report addresses the following resources:

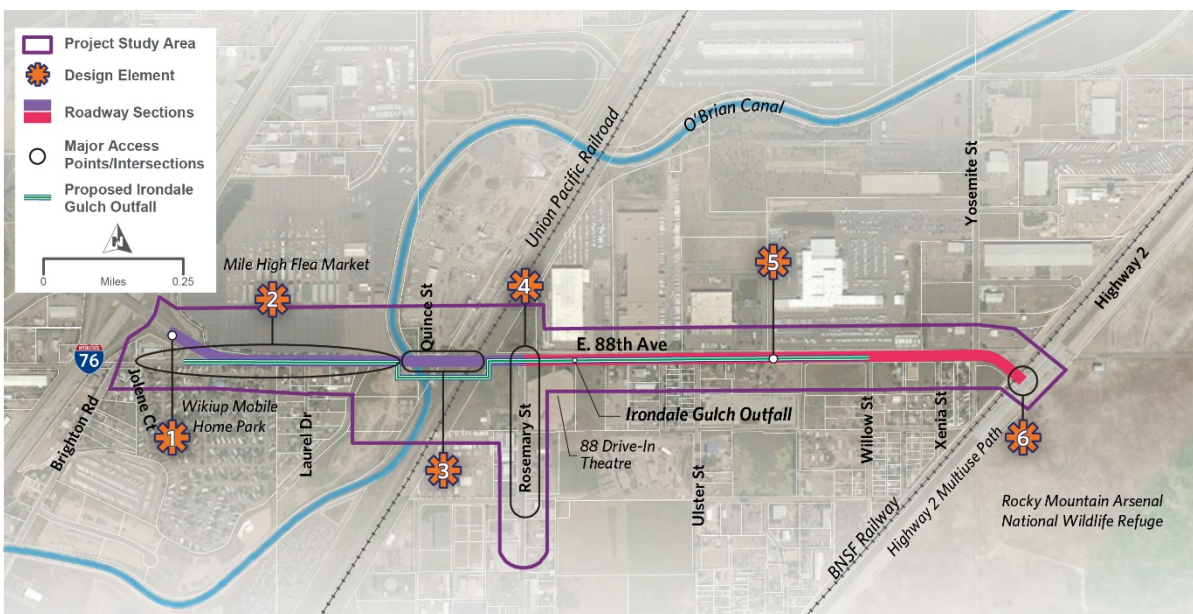
- ◆ Community Demographics
- ◆ Socioeconomic Conditions
- ◆ Land Use
- ◆ Community Facilities, Parks, and Recreational Resources
- ◆ Bicycle, Pedestrian and Transit Resources
- ◆ Environmental Justice

Commerce City is located immediately northeast of Denver and adjacent to the Rocky Mountain Arsenal National Wildlife Refuge, in Adams County, Colorado. The community study area is generally bounded by E. 96th Avenue to the north, Highway 2 to the east, E. 80th Avenue in the south, and Brighton Road in the west (Figure 2). The community study area was expanded outside of the project study area (shown in

Figure 3) to accurately represent the surrounding population, include the Irondale Neighborhood, and to account for indirect impacts resulting from the Proposed Action. Within the corridor, E. 88th Avenue crosses over the O'Brian Canal on a bridge, crosses a UPRR track at grade west of Rosemary Street, and crosses a BNSF track at grade west of Highway 2.

The Proposed Action Alternative and the No-Action Alternative evaluated in this report are described in detail in the *88th Avenue (I-76 to Highway 2) Environmental Assessment*. The Proposed Action would reconstruct E. 88th Avenue just east of the I-76 northbound ramps between Brighton Road and Highway 2 to improve traffic operations and accommodate all users. The design elements that comprise the Proposed Action are numbered from west to east and described in Figure 3.

Figure 3. Project Study Area and Proposed Action Design Elements



- 1) Two lanes each direction, with raised median and a multiuse path on the north and sidewalk on the south, west of Rosemary Street.
- 2) Access changes between Brighton Road and the O'Brian Canal:
 - a. Improved Jolene Court approach to Brighton Road.
 - b. Permitted U-turn at E. 88th Avenue and Brighton Road.
 - c. Improved access at the Mile High Flea Market with a signalized intersection, dedicated left-turn and U-turn movements, and dynamic lane (left-turn lane during events and travel lane during normal roadway operations).
- 3) New single-span bridge over the O'Brian Canal and improved at-grade crossing of UPRR to accommodate wider roadway and bicycle and pedestrian facilities.
- 4) Widened Rosemary Street with sidewalks on both sides and reconfigured intersection with E. 88th Avenue.
- 5) One lane in each direction, with a two-way left-turn lane and a buffer-separated multiuse path on the north and sidewalk on the south, east of Rosemary Street.
- 6) Multiuse path and sidewalk extended across the BNSF tracks and Highway 2.

Stormwater Drainage and Water Quality Treatment – Section of Irondale Gulch Outfall would detain stormwater and water would be treated within the proposed right-of-way.

Under the No-Action Alternative, the project study area would remain largely the same as its existing condition, with the exception of future implementation of the Irondale Gulch Outfall project, which will require reconstructing a portion of E. 88th Avenue from Brighton Road to Willow Street to construct the regional storm sewer underneath the roadway.

2.0 COMMUNITY DEMOGRAPHICS

The corridor is located within Adams County in Commerce City. Data was collected using U.S. Census block groups and census tracts located within and adjacent to the corridor to determine community characteristics. A census block group is a cluster of census blocks and generally contains approximately 600 to 3,000 people. Census tracts are a cluster of block groups and generally have a population size between 1,200 and 8,000 people.

The Proposed Action has the potential to affect two census block groups that are located within and adjacent to the corridor—Census Tract 88.01, Block Group 1; and Census Tract 88.02, Block Group 1 (Figure 2).

Two parcels at the west end of the corridor between Brighton Road and the I-76 northbound off-ramps are outside of the noted census block groups. These parcels are included in the community study area; however, no demographic or community characteristics data was collected for their associated block groups because no impacts are anticipated to these parcels and almost all of the block groups are located outside of the community study area.

2.1 Land Use

2.1.1 Related Plans and Policies

Local land use decisions and policy within the project study area is governed by Commerce City and Adams County. Commerce City's *C3 Vision Comprehensive Plan* governs land use and zoning (Commerce City, 2010b). Adams County's *Comprehensive Plan, Imagine Adams County*, governs land use and zoning at the county level (Adams County, 2012). Commerce City and Adams County collaborate with DRCOG so that the communities' development and infrastructure are consistent with the overall vision of the Denver region.

E. 88th Avenue between I-76 and Highway 2 is mentioned in several long-term planning documents that set the policy for the project study area. Table 1 summarizes long-term planning documents with plans or policies related to land use within the project study area.

Table 1. Existing Long-term Planning Documents

Plans	Significance of Plan
<i>Irondale Neighborhood and Infrastructure Plan</i> (Commerce City, 2018).	The plan defines the Irondale Neighborhood as south of E. 88th Avenue between UPRR tracks and the BNSF/Highway 2 corridor, describes its development history, and discusses the existing land use and infrastructure as well as future land use and infrastructure projects to achieve development/redevelopment in the area.
<i>Commerce City C3 Vision Transportation Plan</i> (Commerce City, 2010a)	The plan identifies constructing a grade separation at E. 88th Avenue and UPRR. The railroad corridors on both the east and west sides of E. 88th Avenue limit east-west connectivity.

Table 1. Existing Long-term Planning Documents

Plans	Significance of Plan
<i>Walk. Bike. Fit. Commerce City</i> (Commerce City, 2012)	The plan identifies developing multi-use facilities throughout E. 88th Avenue corridor, from the future RTD light rail station in the City of Thornton to Highway 2. The plan indicates that the project study area is currently being cut off from existing active transportation networks.
<i>Commerce City C3 Vision Comprehensive Plan</i> (Commerce City, 2010b)	The plan is the guiding policy document for Commerce City. The plan identifies the study area being part of one of the five original Commerce City neighborhoods with goals for better connectivity of public infrastructure, strengthening the industrial areas, rezoning, and encouraging infill development.
<i>Imagine Adams County, Adams County Comprehensive Plan</i> (Adams County, 2012)	The plan is the guiding policy document for Adams County. It discusses major goals for the county and municipalities within the county in order to support future anticipated urban growth and development. The plan also highlights some major issues that affect the land use in the project study area. In some cases, such as within the project study area, water and sewer services are only provided to parcels within Commerce City, and not Adams County parcels surrounded by Commerce City. To gain water and sewer services, the parcel must be annexed by Commerce City. This leads to the checkerboard of parcels within Commerce City or unincorporated Adams County within the project study area.
<i>2040 Metro Vision Plan</i> (DRCOG, 2020)	The DRCOG MetroVision Plan guides DRCOG’s work and establishes a shared aspirational vision for the Denver region. The plan notes proposed freight-related transportation improvements on E. 88th Avenue.

2.1.2 Existing Land Use

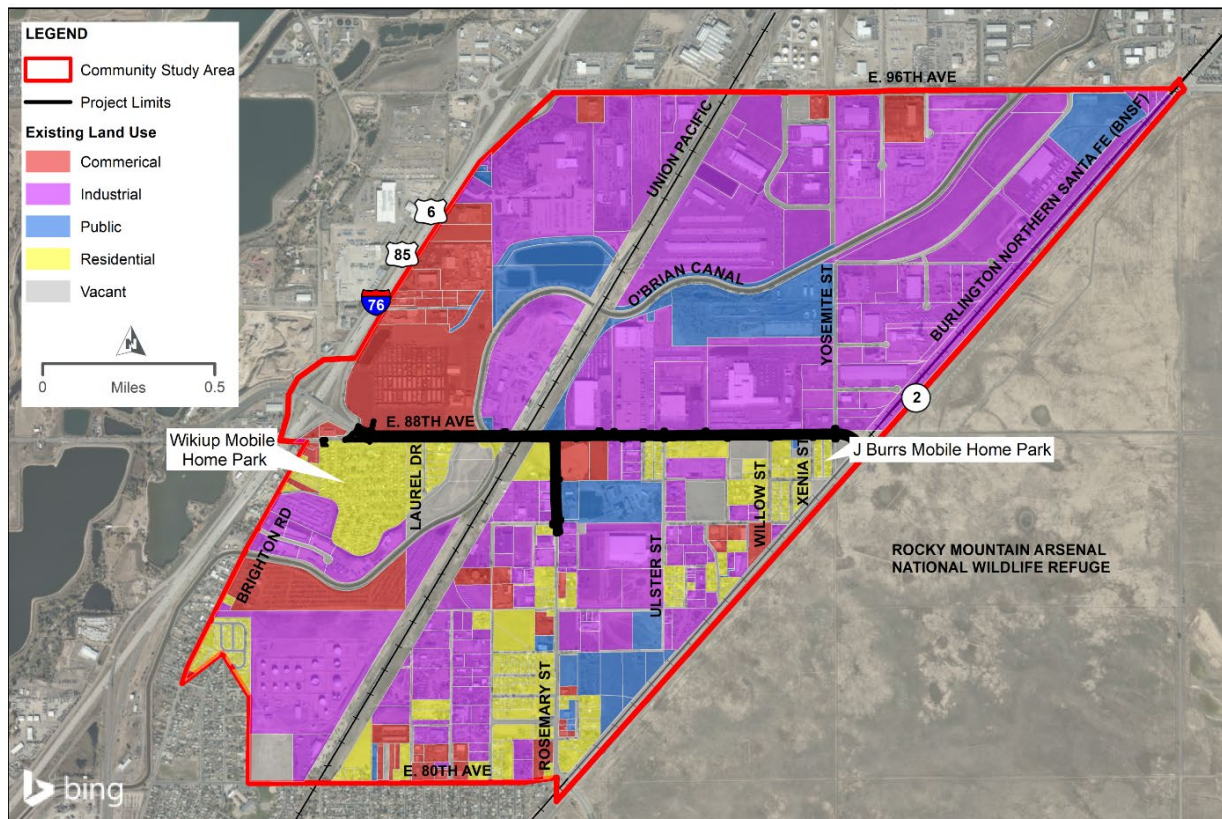
Although most parcels in the community study area are within Commerce City, there are a number of parcels within unincorporated Adams County. The two jurisdictions have different standards of development, land use, and zoning, so the land uses for each of them were combined into broader categories to simplify this assessment. Figure 4 shows existing land use in the community study area.

The land use north of E. 88th Avenue is primarily commercial and industrial in what the *Commerce City C3 Vision Comprehensive Plan* refers to as the industrial enclave. Land use south of E. 88th Avenue is mixed with residential areas on the east and west ends and some commercial, industrial, and agricultural uses in the middle. Some parcels in the community study area are currently vacant.

While land use within the community study area is primarily industrial in nature, residential mobile home parks are located in the southeast quadrant of E. 88th Avenue and Brighton Road (Wikiup Mobile Home Park) and the southwest quadrant of E. 88th Avenue and Yosemite Street (J Burrs Mobile Home Park). Additional residential areas are found at the following locations:

- ◆ Laurel Drive, Tamarac Street, and Ulster Street
- ◆ South of E. 88th Avenue, between the O’Brian Canal and UPRR track
- ◆ Southeast quadrant of Willow Street and E. 87th Avenue
- ◆ Southeast quadrant of Quebec Street and E. 83rd Avenue
- ◆ E. 82nd Avenue and E. 83rd Place

Figure 4. Existing Land Use



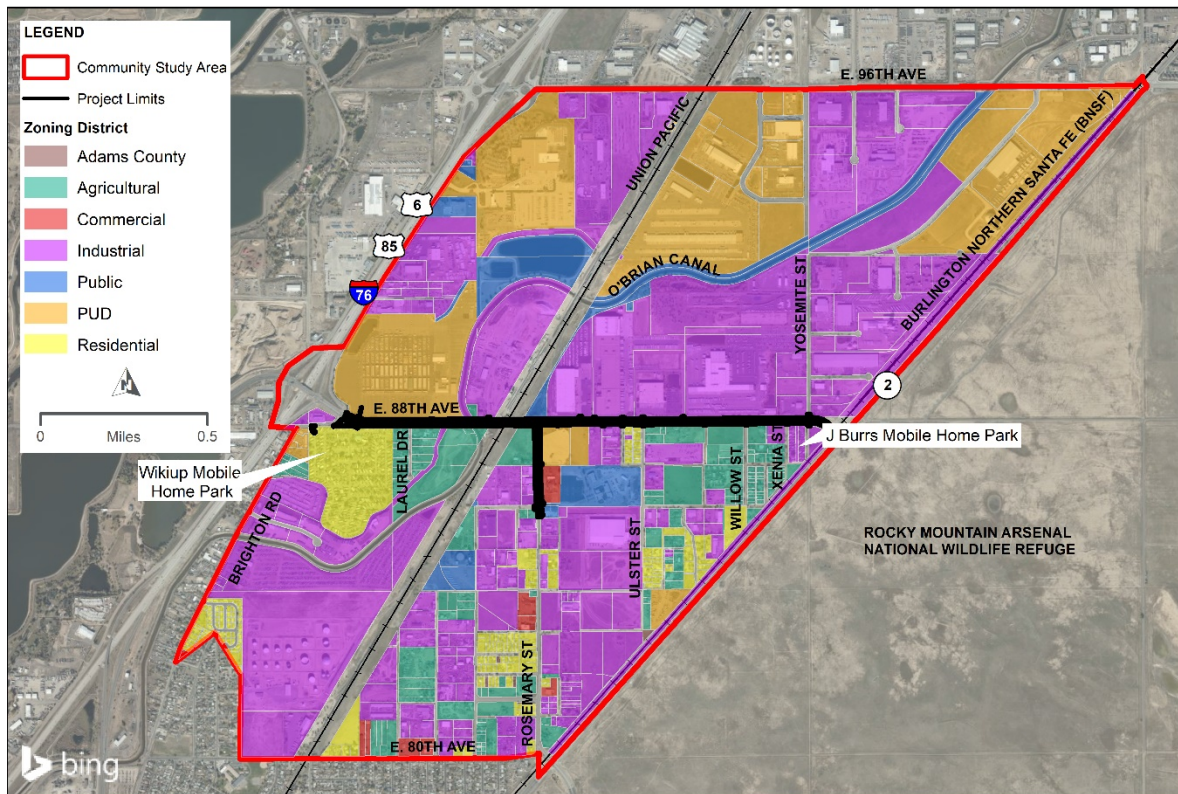
Source: HDR Desktop Survey, 2019

The Irondale Neighborhood (Figure 2) is wholly encompassed within the community study area. It is bordered by the UPRR, E. 88th Avenue, Highway 2, and E. 80th Avenue. According to the *Irondale Neighborhood Infrastructure and Development Plan* (Commerce City, 2018), some of the agricultural land uses within the boundaries of the Irondale Neighborhood are currently undeveloped and not being used for agricultural purposes. A number of parcels within the Irondale Neighborhood have land use characteristics in addition to the residential use; for example, agricultural (as evidenced by a number of farm animals), or industrial (as evidenced by outdoor storage facilities).

2.1.3 Existing Zoning

Within the community study area, zoning is a mixture of industrial, residential, and agricultural (Figure 5). There is a large amount of land zoned as agricultural or industrial, but currently undeveloped. The Mile High Flea Market is zoned as a planned unit development (PUD). Figure 5 shows the existing zoning within the community study area.

Figure 5. Existing Zoning



Source: Adams County, 2016; Commerce City, 2016.

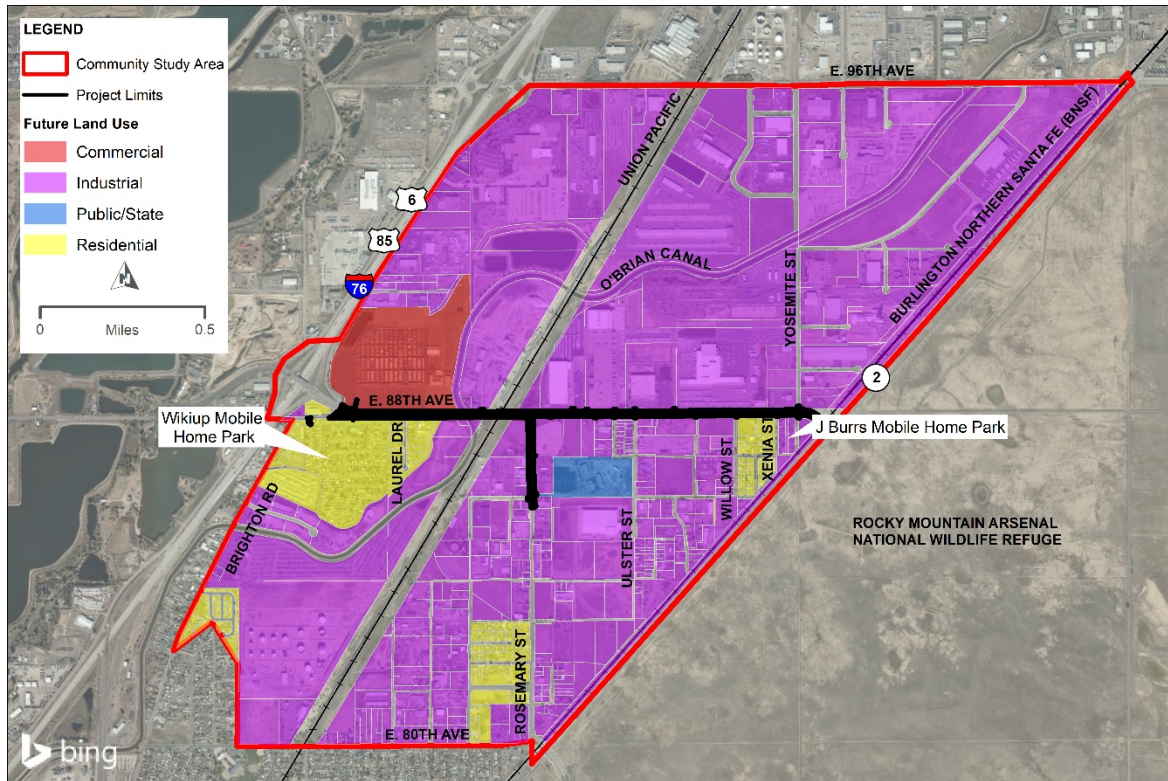
2.1.4 Future Land Use

With the proximity of the project study area to three interstates, two railroads, and the Denver International Airport, industrial businesses are expected to grow. Current agricultural and vacant parcels are planned to be developed as industrial land uses.

The *Irondale Neighborhood Infrastructure and Development Plan* (Commerce City, 2018) evaluated two alternative future land use scenarios—one that aligns with the existing land use, and one that transitions to primarily industrial and commercial uses. The latter is the preferred scenario identified in the plan, with an emphasis on industrial use in all areas of the Irondale Neighborhood, service-oriented commercial use along Rosemary Street and E. 80th Avenue corridors, and limited future residential use.

Future land use within the vicinity of the community study area is planned to be primarily industrial distribution and general industrial with small areas of residential uses on the east and west ends of the corridor (Figure 6). The Mile High Flea Market is designated as a future Community Commercial Center. This study assumes future zoning is likely to accommodate the planned future land use.

Figure 6. Future Land Use



Source: Commerce City Future Land Use Online Dataset, 2018; Adams County Future Land Use Online Dataset, 2019

2.1.5 Land Use Impacts Evaluation

Direct impacts to land use were determined by overlaying the footprint of the Proposed Action with existing land uses to determine how much of each existing use would be converted to transportation use. Indirect impacts were determined by reviewing the long-term plans referenced in Section 2.1.1 to understand if potential land use changes would be consistent with future land uses and local planning policy.

No-Action Alternative Impacts

Under the No-Action Alternative, land uses along E. 88th Avenue are likely to change incrementally in compliance with long-term planning efforts and congestion could worsen. However, changes to land use along E. 88th Avenue may not be realized with the same expediency or to the same extent and quality as desired by Commerce City.

Proposed Action Impacts

Direct Impacts

No full property acquisitions, business displacements or residential relocations are anticipated under the Proposed Action. The Proposed Action would require the partial acquisition of property and conversion of existing and future non-infrastructure land uses to transportation right-of-way. Acquisitions treated as

infrastructure are noted in Table 2 and have not been included in the land use impact totals. The Proposed Action would require partial permanent right-of-way acquisitions from 7 parcels with residential, industrial, commercial, and agricultural land uses. No building structure acquisitions are anticipated. These partial right-of-way permanent acquisitions would result in converting approximately 2.0 acres of existing and future land use to transportation use. The Proposed Action would also require the acquisition of permanent utility easements from 13 parcels. These acquisitions would result in functionally converting 1.5 acres of existing and future land use to transportation use.

Table 2. Right-of-Way Requirements and/or Temporary Easements

Property Name or Address	Land Use	Permanent Acquisition (Partial)	Temporary Easement	Permanent Easement
Roadway Right-of-Way	Infrastructure	X	X	X
Murphy Express	Commercial		X	
Wikiup Estates LLC	Residential		X	
Mile High Flea Market parking area	Commercial	X	X	X
6840 E. 88th Ave	Residential		X	
8781 Laurel Drive	Residential		X	
8790 Laurel Drive	Residential		X	
American Canine Academy	Commercial		X	
7202 E. 88th Ave	Commercial/Undeveloped		X	X
O'Brian Canal	Infrastructure	X	X	
Water Sanitation District	Infrastructure	X	X	
7330 E 88th Ave	Residential		X	X
L.G. Everist Inc.	Commercial	X	X	
Union Pacific Railroad	Infrastructure		X	X
8705 Rosemary St	Residential	X	X	X
88 Drive-In Theatre	Commercial		X	X
7790 E. 88th Ave	Commercial/Undeveloped		X	X
Lowes Flatbed Distribution Center	Industrial		X	
7840 E 88th Ave	Industrial		X	X
Lineage Logistics	Industrial		X	
Colorado/West Equipment Inc	Industrial		X	X
DPI Rocky Mountain	Industrial		X	
8796 Tamarac St	Residential		X	X
8771 Ulster St	Residential/Agricultural		X	X
8781 Ulster St	Residential/Agricultural		X	
8786 Ulster St	Residential/Agricultural		X	
8796 Ulster St	Residential/Agricultural		X	X
8190 E 88th Ave	Residential/Agricultural		X	X
8300 E. 88th Ave #1-4	Residential/Agricultural		X	X
8680 E 88th Ave	Residential		X	
Transpec Leasing	Industrial		X	
Flash Services	Commercial		X	
BNSF Railway	Infrastructure			X
Ministerios Palabra De Vida	Commercial/Institutional	X	X	
Limited Enterprises	Industrial	X	X	
Now Heating	Commercial	X	X	

Table 2. Right-of-Way Requirements and/or Temporary Easements

Property Name or Address	Land Use	Permanent Acquisition (Partial)	Temporary Easement	Permanent Easement
Motor Car Auto Carriers	Industrial	X		

Note: Highlighted rows are considered existing infrastructure and have not been included in land use or socioeconomic right-of-way impact totals.

Indirect Impacts

The Proposed Action’s transportation improvements would support planned future land use by providing better access for all users, including pedestrians, bicyclists, general automobile traffic, and heavy trucks and freight traffic. The Proposed Action would respond to current and projected market demand and long-term local land use planning policy. The Proposed Action would accommodate this demand and would be compatible with local long-term planning policies and documents; therefore, the Proposed Action would be a benefit to the planned future land use within the vicinity of the community study area.

Construction Impacts

Construction activities would require temporary easements at 31 parcels with residential, commercial, industrial, and agricultural land uses and cause temporary land use conversions to those land uses. There would be approximately 5.0 acres of temporary easements acquired. Land use for each impacted area would return to its existing or planned future land use when construction of the Proposed Alternative is complete.

2.2 Population and Housing

Table 3 shows the population, household size, and housing characteristics in the community study area. In 2010, there were nearly 46,000 residents within Commerce City, comprising about 10 percent of the Adams County population. The population of the community study area is about 2,155 people, which represents almost 5 percent of the Commerce City population.

Average household sizes in Commerce City (3.15 persons) and the community study area (3.07 to 3.47 persons) are larger on average than those of Adams County (2.85 persons) and Colorado (2.49 persons). The upper end of the range of average household sizes (3.47 persons) within the community study area is higher than those in Commerce City.

Table 3. Population, Household Size, and Housing Characteristics

Area	Population*	Average Household Size**	Owner Occupied (Percent)***	Renter Occupied (Percent)***
State of Colorado	5,029,196	2.49	65.5	34.5
Adams County	441,603	2.85	65.7	34.3
Commerce City	45,913	3.15	69.8	30.2
Census Tract 88.01, Block Group 1	727	3.07	62.4	37.6

Table 3. Population, Household Size, and Housing Characteristics

Area	Population*	Average Household Size**	Owner Occupied (Percent)***	Renter Occupied (Percent)***
Census Tract 88.02, Block Group 1	1,428	3.47	68.6	31.4

*U.S. Census Bureau 2010 Census, Summary File 1, P1, Accessed 4/19/2019.

**U.S. Census Bureau 2010 Census, Summary File 1, P17, Accessed 4/19/2019.

***U.S. Census Bureau 2010 Census, Summary File 1, QT-H3, Accessed 4/19/2019.

There are more than 15,000 housing units in Commerce City, comprising almost 10 percent of the total housing units in Adams County. The 705 total housing units within the community study area are almost 5 percent of all Commerce City housing units (Table 4). Within the community study area, the percent of owner-occupied homes (62.4 to 68.6 percent) is similar to Colorado (65.5 percent), Adams County (65.7 percent), and Commerce City (69.8 percent). Within the community study area, the range of vacancy rates (6.6 to 10.6 percent) is similar to Colorado (10.8 percent), Adams County (5.7 percent), and Commerce City (6.3 percent).

Table 4. Housing Units and Vacancy Rates

Area	Total Housing Units	Occupied Housing Units (Percent)	Vacant Housing Units (Percent)
State of Colorado	2,212,898	89.2	10.8
Adams County	163,136,	94.3	5.7
Commerce City	15,452	93.7	6.3
Block Group 1, Census Tract 88.01	265	89.4	10.6
Block Group 1, Census Tract 88.02	440	93.4	6.6

Source: U.S. Census Bureau 2010 Census, Summary File 1, H3, Accessed 4/19/2019.

2.3 Employment

Table 5 shows the employment characteristics of the community study area. The unemployment rate within the community study area ranges from 7.8 to 9.1 percent, which is higher than the unemployment rate for Colorado (5.2 percent), Adams County (5.1 percent), and Commerce City (4.3 percent). The unemployment rate for Census Tract 88.01 is almost double that of Commerce City, and the unemployment rate for Census Tract 88.02 is more than double that of Commerce City.

A higher percentage of the labor force commutes to and from work in an automobile, either alone or in a carpool, than using public transportation. Use of public transportation within the corridor (2.5 to 3.6 percent) is lower than Adams County (3.8 percent) but higher than Commerce City (2.2 percent).

Table 5. Civilians in Labor Force, Unemployment Rate, and Commuting to Work

Area	Total Civilian Labor Force	Unemployment Rate (Percent)	Automobile Commute, Alone or	Public Transportation
------	----------------------------	-----------------------------	------------------------------	-----------------------

			Carpool (Percent)	Commute (Percent)
State of Colorado	2,912,932	5.2	84.3	3.2
Adams County	259,810	5.1	88.9	3.8
Commerce City	26,334	4.3	90.6	2.2
Census Tract 88.01	2,463	7.8	92.9	2.5
Census Tract 88.02	2,258	9.1	89.9	3.6

Source: U.S. Census Bureau, 2017. American Community Survey, 2013-2017 5-year Estimates, DP03, Accessed 4/19/2019.

3.0 SOCIAL AND ECONOMIC RESOURCES

Resources assessed within the community study area include socioeconomic resources; land use; community facilities, parks and recreational uses; and bicycle, pedestrian and transit resources. Household income is discussed in Section 4.0, Environmental Justice Analysis.

3.1 Socioeconomic Resources

3.1.1 Existing Socioeconomic Conditions

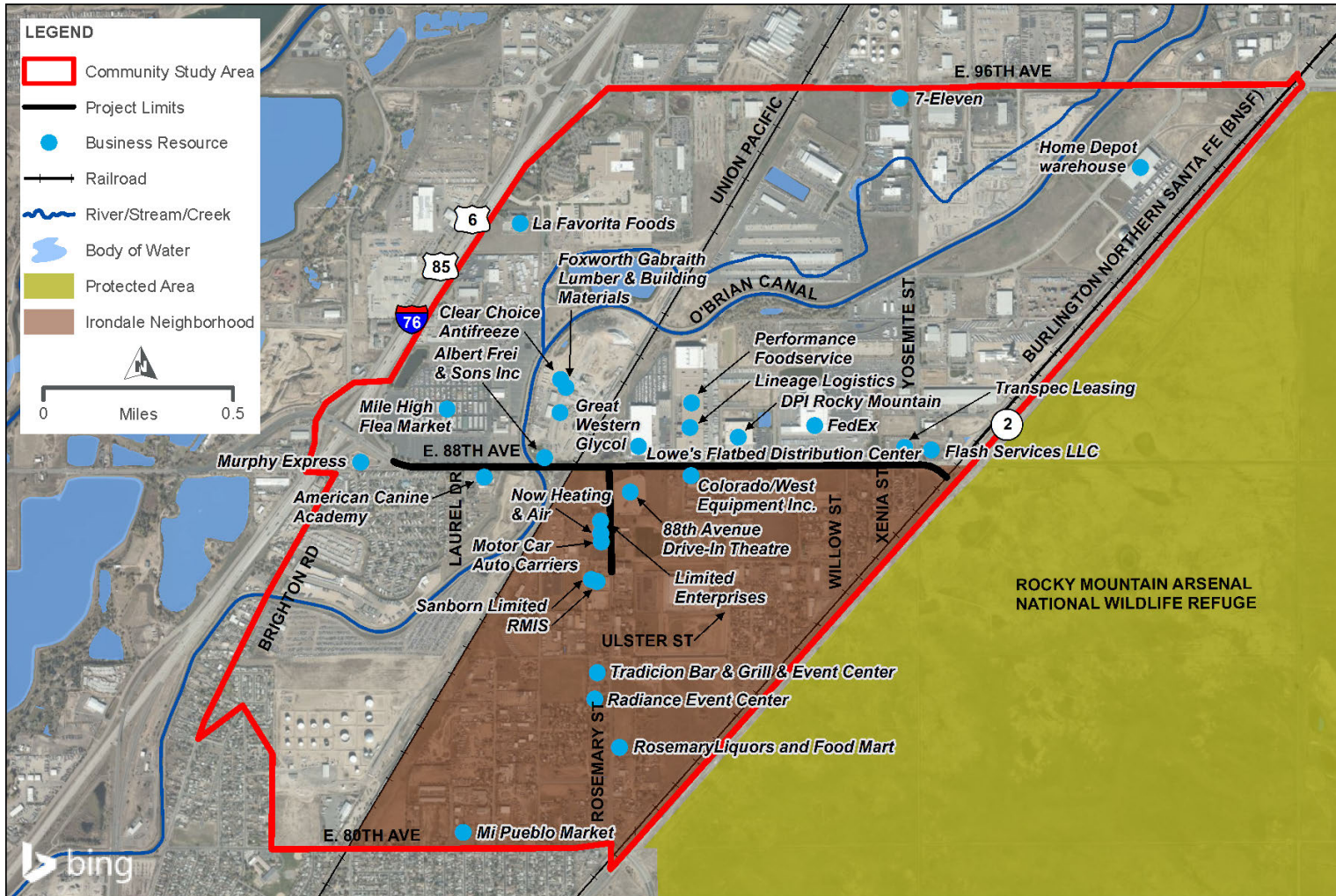
As noted in Section 2.1.2, most of the land in this area is dedicated to commercial and industrial uses. The community study area is located near the crossroads of three interstates (I-70, I-25, I-76), and a former state highway (Highway 2). In addition, two rail lines—the UPRR and BNSF—cross the corridor; and Denver International Airport is located approximately 10 miles to the east. As a result, the community study area’s economy is heavily reliant on freight logistics and industrial manufacturing businesses.

Figure 7 shows the locations of businesses within the community study area that are in close proximity to and accessed by E. 88th Avenue or Rosemary Street, or are in close proximity and serve as a community resource. Types of businesses located within the community study area include gas stations, a flea market, a drive-in movie theatre, a dog training service, materials manufacturing and handling, various types of contractors and repair services, storage and distribution, restaurants, grocery stores, liquor stores, waste collection, and an event center.

The high number of industrial businesses along E. 88th Avenue and Rosemary Street generates a considerable amount of heavy truck traffic that travels to and from I-76 in the west and Highway 2 in the east. The heavy truck traffic can cause traffic delays as it merges onto E. 88th Avenue.

Commerce City’s *Economic Development Strategic Plan* (Commerce City, 2010c) identifies goals of developing and preserving transportation access for vehicle and truck traffic, including eliminating primary traffic choke points where possible. The strong presence of freight activity in the community study area makes it a priority to remove traffic delays and develop safe travel for alternative transportation modes.

Figure 7. Businesses and Socioeconomic Resources within the Community Study Area



Source: HDR, 2019.

3.1.2 No-Action Alternative Impacts

Under the No-Action Alternative, the substandard roadway design and lack of bicycle and pedestrian facilities would remain and exacerbate congestion issues and the movement of goods through the corridor as the numbers of heavy truck trips and overall traffic volumes are expected to grow. The No-Action Alternative is not consistent with the goals of Commerce City's *Economic Development Strategic Plan* (Commerce City, 2010c).

3.1.3 Proposed Action Impacts

Direct Impacts

Direct impacts to residents and businesses within the community study area are expected to be minor. No residential or business displacements would result from the Proposed Action. Improvements have been contained within the existing right-of-way to the greatest extent possible while still serving the project Purpose and Need. The Proposed Action would require additional right-of-way and/or easements from socioeconomic resources immediately adjacent to E. 88th Avenue and Rosemary Street. Acquisitions treated as infrastructure are noted in Table 5 and have not been included in the socioeconomic impact totals. There would be approximately 2.0 acres of permanent right-of-way acquisition, impacting 7 residential, commercial and industrial parcels. No building structure acquisitions are anticipated. Additionally, permanent utility easements totaling approximately 1.5 acres, impacting 13 parcels would be required. Table 5 lists each property with right-of-way impacts and the type of right-of-way acquisition. The Right-of-Way Plan associated with the Preliminary Design is available upon request from the City of Commerce City.

Partial right-of-way requirements, permanent utility easements and/or temporary easements are expected from the residences and businesses listed in Table 2.

The Proposed Action would impact approximately 3 percent (approximately 1 acre out of 34 acres) of the overall parking spaces at Mile High Flea Market. The partial acquisition from the Mile High Flea Market would mostly occur for a portion of the property adjacent to E. 88th Avenue that has been identified for right-of-way preservation. The loss of parking and the amount of right-of-way required would not affect the use or overall operations of the Mile High Flea Market. Partial right-of-way acquisition would be required from several businesses. The amount of right-of-way required would not affect the use, or overall operations, of the various businesses.

Access at some residences, Mile High Flea Market and American Canine Academy would change to right-in/right-out only movements. The Mile High Flea Market has a separate official entrance and the American Canine Academy does not rely solely on drive-by traffic and should not be notably impacted by the change in access.

Indirect Impacts

Minor access impacts are expected for businesses along E. 88th Avenue between Brighton Road and Rosemary Street, and along Rosemary Street from E. 88th Avenue to south of the 88 Drive-In Theatre entrance. Access to driveways along these portions of the roadway where there would be raised medians would be restricted to right-in/right-out movements. For example, motorists wishing to access American Canine Academy via westbound E. 88th Avenue would no longer be able to do so by turning left. They would instead be required to pass the business, make a U-turn at Brighton Road, and then turn right into

the business' driveway. Customers could perceive this to be an inconvenience to patronize businesses that rely on drive-by traffic, such as fast-food restaurants and gas stations/convenience stores. Destination-type businesses would not be as affected with the right-in/right-out movements.

The improved signalized intersection at the main entrance of the Mile High Flea Market and E. 88th Avenue, with a dedicated left-turn lane and a dynamic lane, would better serve event traffic accessing the Mile High Flea Market. Event traffic currently backs up on E. 88th Avenue. The existing Quince Street alignment would continue to connect directly to E. 88th Avenue where it does today. There would be a westbound dedicated acceleration lane and eastbound dedicated left-turn lane on E. 88th Avenue to assist the movement of slow-moving freight vehicles.

The Proposed Action is consistent with the goals identified in Commerce City's *Economic Development Strategic Plan* (Commerce City, 2010c).

Construction Impacts

Construction activity would require temporary easements and cause temporary impacts to residential, commercial, industrial, and agricultural land uses and access as connections with E. 88th Avenue and Rosemary Street are reconstructed. There would be approximately 5.0 acres of temporary construction easements to residential, commercial, industrial, and agricultural properties. Travel through the project corridor may be temporarily impacted during periodic construction activities, which may also impact the movement of goods. There would be a temporary increase in particulate emissions from fugitive dust and increase in airborne pollution from construction vehicles.

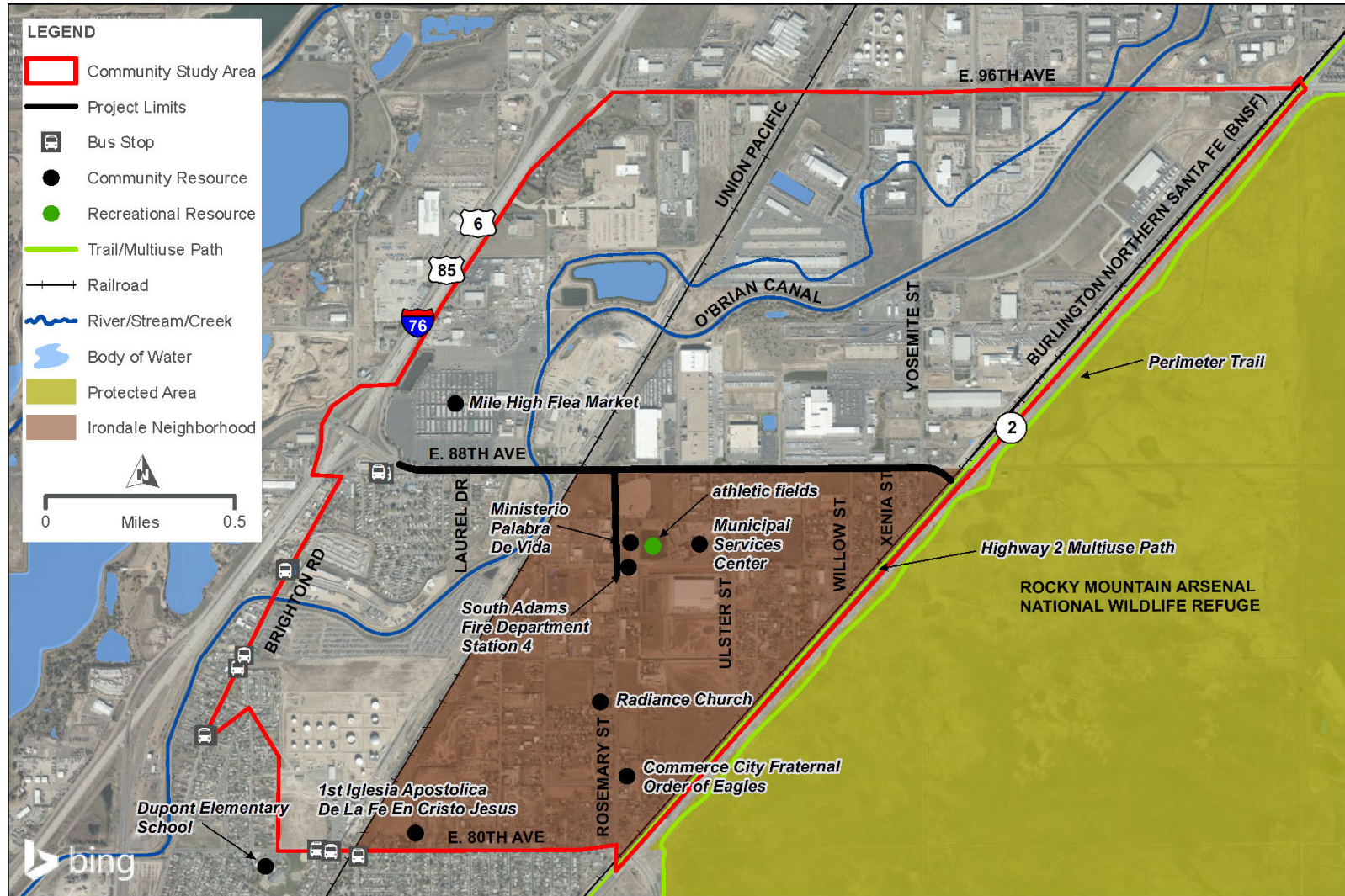
3.2 Community Facilities, Parks, and Recreational Facilities

3.2.1 Existing Conditions

The community facilities within the community study area, or in close proximity to it, are shown in Figure 8 and listed below. These facilities provide a space or opportunity for community gathering, promote and support community cohesion.

- ◆ Ministerio Palabra De Vida – A local Spanish language Christian church.
- ◆ South Adams Fire Department Station 4 – A community fire department.
- ◆ Municipal Services Center – The property includes the service center which houses six public works divisions..
- ◆ Radiance Church – A local English language community church.
- ◆ Mile High Flea Market – A regional open-air community market.
- ◆ 1st Iglesia Apostolica De La Fe En Cristo Jesus – A local Spanish language Apostolic Church.
- ◆ Commerce City Fraternal Order of Eagles – A gathering place for a non-profit organization that donates to local communities, fundraisers and charities.
- ◆ Dupont Elementary School – An elementary school that is part of the Adams County 14 School District.

Figure 8. Community Facilities



There are no parks in the community study area, but there are two public recreational facilities—the Municipal Services Center Athletic Fields in the northeast quadrant of Rosemary Street and E. 86th Avenue, with access via Rosemary Street, and the multiuse path on the east side of Highway 2. Both facilities are owned by Commerce City. Although not in the project study area, the Rocky Mountain Arsenal Wildlife Refuge Perimeter Trail, a recreational resource, can be accessed from Highway 2 intersection.

The Municipal Services Center Athletic Fields include two fields that support football and soccer activities and are open from 5 a.m. to 10 p.m. Sunday through Thursday, and 5 a.m. to 11 p.m. Friday and Saturday. The fields can be rented for priority use and are otherwise open to the public. This Municipal Services Center Athletic Fields resource is shown on the *Commerce City Park, Trail, Open Space and Recreation Map and Guide* (Commerce City, 2021) as a “Neighborhood Park”.

The Highway 2 Multiuse Path runs parallel on the east side of Highway 2 from Quebec Street at its south end to E. 112th Avenue at its north end. The multiuse path was constructed in 2018. In the vicinity of the intersection of E. 88th Avenue and Highway 2, it is approximately 10 feet wide, and is located within the roadway right-of-way. This multiuse path is shown on the *Commerce City Park, Trail, Open Space and Recreation Map and Guide* (Commerce City, 2021) as a “Multiuse Path”.

Though outside of the community study area, immediately adjacent to its eastern boundary is the 12,500-acre Rocky Mountain Arsenal National Wildlife Refuge. Although there is no direct access to the refuge from E. 88th Avenue, the 22-mile Perimeter Trail for hiking and bicycling encircles the refuge and can be accessed near the E. 88th Avenue/Highway 2 intersection.

3.2.2 Community Facilities, Parks and Recreational Facilities Impacts Evaluation

No-Action Alternative Impacts

Under the No-Action Alternative, E. 88th Avenue and Rosemary Street would continue to lack pedestrian and bicycle options to directly access community and recreational facilities. Travel to these facilities could be hampered by continuing congestion and delay.

Proposed Action Impacts

Direct Impacts

As mentioned in Section 3.1.2, right-of-way requirements would impact the Mile High Flea Market parking lot. The main E. 88th Avenue entrance to the Mile High Flea Market would be maintained and improved as a signalized intersection, with a dedicated left-turn lane and dynamic lane to help with traffic flow during events.

Minor permanent access changes would occur at Ministerio Palabra De Vida, a place of worship. A new median on Rosemary Street would restrict turning movements at the northern driveway to right-in/right-out only. The southern driveway would not be restricted. Additional right-of-way would be required from this property adjacent to Rosemary Street. The amount of right-of-way is not expected to affect operations at Ministerios Palabra Vida. A minor amount of right-of-way acquisition is also expected at the South Adams Fire Department Station #4 but would not affect operations. No impacts to the athletic fields or Perimeter Trail are anticipated.

Once constructed, the improvements would have a positive effect on access to these community facilities, as increased roadway capacity and travel time reliability would ease access via automobile, and the multiuse path and sidewalks would provide new bicycle and pedestrian facilities and connections to existing facilities.

Indirect Impacts

The easing of congestion would result in improved response times for emergency service providers using Rosemary Street and E. 88th Avenue. School transportation services and carpooling traffic associated with Dupont Elementary School (located just outside the community study area, shown on Figure 8) would experience similar benefits. The Proposed Action would positively impact use of and accessibility to the Municipal Services Center athletic fields and Rocky Mountain Arsenal National Wildlife Refuge Perimeter Trail with continuous multiuse paths and/or sidewalks connecting to both resources. In the case of the Rocky Mountain Arsenal National Wildlife Refuge Perimeter Trail, a new protected crosswalk across Highway 2 would connect the proposed bicycle and pedestrian facilities along E. 88th Avenue to the trail. These facilities would be more accessible to all users within the community study area along E. 88th Avenue and Rosemary Street.

Construction Impacts

Access to various community facilities located in the community study area may be temporarily impacted during construction activities. Community facilities with direct access from E. 88th Avenue or Rosemary Street include the following:

- ◆ Mile High Flea Market
- ◆ Ministerio Palabra De Vida
- ◆ South Adams Fire Department
- ◆ Municipal Services Center and Athletic Fields
- ◆ Highway 2 Multiuse Path

The Rocky Mountain Arsenal National Wildlife Refuge Perimeter Trail will be accessible via Highway 2 throughout construction. The assessment of recreational resources under Section 4(f) occurs in the *Non-Historic Section 4(f) Resources Technical Memorandum*, located in Appendix A to the *88th Avenue (I-76 to Highway 2) Environmental Assessment*.

In addition to temporary impacts to access, during construction, there would be a temporary increase in particulate emissions from fugitive dust and an increase in airborne pollution from construction vehicles.

3.3 Bicycle, Pedestrian, and Transit Resources

3.3.1 Existing Bicycle and Pedestrian Facilities

A review of DRCOG's regional bicycle network data indicates that there are no designated bike routes, bike lanes, or shared use paths along the community study area that support bicycling (DRCOG, 2019a). Bicyclists are limited to cycling on roads or on the dirt shoulders of the roadway, and there are no built bicycle connections to transit stops. RTD buses are equipped to transport bicycles, but there are no bike lockers at the transit stops within the community study area.

A review of DRCOG’s Paved Sidewalk Centerlines data indicates that there are very minimal to no paved sidewalks or trails wider than five feet within the community study area (DRCOG, 2018). With the exception of the intersection of Brighton Boulevard and E. 88th Avenue, there are no signalized pedestrian crosswalks in the community study area. The intersection at Rosemary Street and 88th Avenue is signalized for traffic but has no crosswalk or signal for bicyclists and pedestrians. The Brighton Boulevard and E. 88th Avenue intersection has one crosswalk and a pedestrian push button on the east side. With the exceptions noted above, pedestrians and bicyclists currently travel on unpaved roadway shoulders and are limited to crossing E. 88th Avenue at unsignalized intersections with no pedestrian phasing or pedestrian facilities. There are no ramps or safe mobility options for wheelchair access. The entire corridor is not compliant with Americans with Disabilities Act standards.

3.3.2 Future Bicycle and Pedestrian Facilities

DRCOG’s *Denver Regional Active Transportation Plan* does not include any future planned regional bike and pedestrian corridors within the community study area (DRCOG, 2019b). At a broader level, Adams County has an established network for biking and walking, including the South Platte River Trail, Sand Creek Greenway, Clear Creek Trail, and Farmer’s High Line Canal Trail, which all pass through the County and link residents to destinations within the county and to networks in adjacent communities.

A ditch service road currently parallels the O’Brian Canal, and there are plans to develop it into a local recreational trail (*Commerce City Prairieways Action Plan* [Commerce City, 2000]). The planned O’Brian Canal Loop would provide new pedestrian and bicycle connections to the regional network of pathways. Funding has not been programmed for this trail and the property is not publicly owned.

Table 6 shows bicycle and/or pedestrian plans that are relevant to the community study area.

Table 6. Bicycle and Pedestrian Plans

Existing and Relevant Bicycle Plans	Relevance to Study Area
<i>Commerce City Park, Trail, Open Space and Recreation Map and Guide</i> (Commerce City, 2021)	The purpose of the map and guide is to identify and describe parks, trails and recreation facilities in Commerce City. The map identifies the multiuse path along Highway 2.
<i>Walk, Bike, Fit A Multi-Modal Active Transportation Plan</i> (Commerce City, 2012)	The plan identifies several resources located within or nearby the study area. One of these resources includes the O’Brian Canal and Burlington Ditch. The plan’s list of projects also included the 88th Avenue Cross Town Link, which highlights the proposed improvements to the existing street that would help connect different parts of town. The community study area would also connect major residential areas and popular routes for pedestrian travel by creating safer environments for crossing intersections and railroad tracks.
<i>C3 Vision Transportation Plan</i> (Commerce City, 2010a)	The plan identifies that multimodal transportation corridors will be imperative for the City to support a growing population. The plan indicates developing transit services with RTD as a priority for the future, including developing a new transit route that “would serve

Table 6. Bicycle and Pedestrian Plans

Existing and Relevant Bicycle Plans	Relevance to Study Area
	<p>Brighton, Commerce City, and downtown Denver via I-76, SH 2, 88th Avenue, and I-25.”</p> <p>The City has also made the expansion of the existing multiuse trail network a priority including the development of trails and other roadway connectors to the Rocky Mountain Arsenal National Wildlife Refuge. This applies to proposed regional trails like the O’Brian Canal Loop that bisects the community study area as there may be future opportunities to create more regional connectors within the transportation network.</p>
<p><i>Commerce City Prairieways Action Plan</i> (Commerce City, 2000)</p>	<p>The purpose of the plan is to protect and enhance environmental and cultural resources through a quality park, trail, and open space system and includes connecting trail resources to 88th Avenue. The document identifies resources such as the planned O’Brian Canal Greenway, which connects to other trail resources like the Rocky Mountain Arsenal National Wildlife Refuge. The O’Brian Canal has a planned 12-foot crushed stone multiuse trail along the entire length and runs approximately 13 miles from Sand Creek to Barr Lake State Park.</p>
<p><i>2040 Metro Vision Regional Transportation Plan Coordinated Transit Plan</i> (DRCOG, 2020)</p>	<p>The regional transportation plan identifies several areas with lower-income populations and populations without a motor vehicle, which includes Commerce City. In the transit element of the transportation plan, no transit services are identified along E. 88th Avenue. One bus route (Route 88) is shown to run through the community study area. As discussed in the next section, there is a northbound and southbound transit stop for Route 88 on Brighton Boulevard. The plan focuses on areas where transit may be especially useful, analyzing for populations that may be lower income, relying on late night transit service, and those that may be identified as environmental justice populations.</p>
<p><i>Denver Regional Active Transportation Plan</i> (DRCOG, 2019)</p>	<p>The purpose of the plan is to establish a regional vision for bicycling and walking. The plan addresses bicycle and pedestrian-related issues pertaining to the community study area in the context of Adams County. Walking and cycling currently account for less than two percent of work trips within the county (1.3 percent and 0.3 percent, respectively). Two-thirds of workers living in Adams County are also employed in another county, limiting the potential for walking and bicycling as a commute options for many workers.</p>

3.3.3 Existing Transit Facilities

RTD provides transit services in Commerce City with local and regional bus routes and the SkyRide service to Denver International Airport. Services in the community study area are limited to RTD’s local bus Route 88 that travels on Brighton Road. Route 88 extends from Central Park Station on 37th Avenue in Denver to 106th Avenue in Northglenn with a stop at the Thornton Park-n-Ride. The route operates seven days a week from 5:55 a.m. to 11:55 p.m., with a reduced schedule on the weekends. The route provides connections to community resources south and west of the community study area, such as schools, a medical center, shopping areas, and recreational facilities. Connections can be made to RTD’s commuter rail A-Line to Denver International Airport. Additionally, RTD’s N-Line opened on September 21, 2020, and is along Route 88 west of the community study area. There are two bus stops (one

northbound and one southbound) on Brighton Road near its intersection with E. 88th Avenue (Figure 9). Bus stop facilities at these two locations are currently single sign poles. There are no bus shelters, sidewalks, signage, or seating at these sites.

RTD's *access-a-ride* service is available to people with disabilities in the community study area within a ¾ mile of RTD's fixed-route transit system. The service is offered on the same days and hours as the local routes. Although no data is available online specific to those serviced within the community study area.

Figure 9. Existing Bus Stops



3.3.4 Future Transit Facilities

Commerce City's *C3 Vision Transportation Plan* (Commerce City, 2010a) identified potential new bus routes and facilities. A potential route would service Brighton, Commerce City, and downtown Denver via I-76, Highway 2, I-25, and E. 88th Avenue. This route would provide new services to the remaining portion of the community study area that currently does not have transit service.

3.3.5 Bicycle, Pedestrian, and Transit Impacts Evaluation

No-Action Alternative Impacts

Under the No-Action Alternative, the current lack of adequate, safe pedestrian and bicycle facilities and adequate transit connections would not improve multimodal connectivity or provide safe accommodations for multimodal users.

Proposed Action Impacts

Direct Impacts

The Proposed Action is not expected to have any negative direct impacts to existing bicycle, pedestrian or transit facilities, and transit users.

The new bicycle and pedestrian facilities described below are expected to benefit bicyclists and pedestrians:

- ◆ Continuous multiuse path on the north side and sidewalks on the south side of E. 88th Avenue between Brighton Road and Highway 2.
- ◆ Signalized crosswalks at the Brighton Road (replacing existing crosswalks), Mile High Flea Market Entrance (new crosswalks), and Rosemary Street (new crosswalks) intersections with E. 88th Avenue. Crosswalks would also be included at intersecting cross-streets and driveways along E. 88th Avenue within the community study area. In addition, there would be new at-grade pedestrian and bicycle improvements at the UPRR track, BNSF track and Highway 2 to connect with the Rocky Mountain Arsenal National Wildlife Refuge Perimeter Trail. Pedestrian, bicycle and safety improvements at the UPRR track and BNSF track will be determined during a subsequent design phase.
- ◆ Sidewalks along both sides of Rosemary Street.
- ◆ Bicycle and pedestrian improvements would be compliant with Americans with Disabilities Act standards.

The implementation of a multiuse path, sidewalks, and signalized crosswalks, as proposed, would improve connectivity and safety for multimodal users between residential areas, nearby businesses, community resources, and transit stops and remove users from the roadways and shoulders. The new median and center turn lane on E. 88th Avenue would serve as pedestrian refuges and reduce left-turn conflicts with bicyclists at designated left-turn lanes, resulting in a higher level of safety for all users.

Indirect Impacts

Because the Proposed Action would address congestion along the corridor, it would result in less traffic diverting to side streets and making illegal U-turns. This would make neighborhood streets safer for all users within the community study area.

The Proposed Action would accommodate and benefit users of the planned O'Brian Canal trail, if constructed, by not precluding a corridor for the trail and providing an additional connection to an east-west bicycle corridor.

Construction Impacts

The Proposed Action would physically impact use of the existing crosswalk at E 88th Avenue at the intersection with Brighton Road during construction activities.

Temporary impacts to access would occur to the pedestrian sidewalks associated with businesses in the northwest quadrant of Rosemary Street/E. 86th Avenue and at Ministerios Palabra De Vida.

Bicycle and pedestrian use of the corridor, some intersecting roadways, the Highway 2 Multiuse Path, and/or informal paths would also be restricted or limited temporarily during construction.

Minor impacts to transit routes and facilities are expected. The easternmost RTD Route 88 bus stop on the south side of Brighton Road near Murphy Express is expected to be physically impacted by construction activities, but the bus stop will be relocated near its existing location as part of the Proposed Action. Construction activities may temporarily delay RTD's Route 88 and access-a-ride service. Access to all of the bus stops within the community study area may be limited temporarily during construction.

4.0 ENVIRONMENTAL JUSTICE ANALYSIS

Environmental justice refers to social equity in sharing the benefits and burdens of specific projects or programs, which is an important component of all Commerce City transportation projects. Socioeconomic information was collected for populations within the community study area to develop and understand potential impacts and possible benefits of the Proposed Action to the local community, including any identified minority and/or low-income populations. The analysis followed the FHWA policy regarding environmental justice (FHWA Order 6640.23A) and the *FHWA Guidance on Environmental Justice and National Environmental Policy Act (NEPA)* (FHWA, 2011), as identified in the *CDOT NEPA Manual* (CDOT, 2020). The evaluation of potential impacts to minority and low-income populations followed the guidance summarized in the *CDOT NEPA Manual*. The following sources provided the data used for the environmental justice analysis:

- ◆ U.S. Census Bureau, 2010 Census (U.S. Census Bureau, 2010)
- ◆ U.S. Census Bureau, 2013-2017 American Community Survey 5-year Estimates (U.S. Census Bureau, 2017)
- ◆ U.S. EPA EJSCREEN Tool (EPA, 2019)
- ◆ U.S. Department of Housing and Urban Development

Definitions are determined by the *FHWA Guidance on Environmental Justice and NEPA* (FHWA, 2011) for the following terms:

Adverse effect. The FHWA Guidance and USDOT Environmental Justice Orders state that “adverse effects” mean the totality of significant individual or cumulative human health or environmental effects, including interrelated social and economic effects which may include, but are not limited to: bodily impairment, infirmity, illness, or death; air, noise, and water pollution and soil contamination; destruction or disruption of human-made or natural resources; destruction or diminution of aesthetic values; destruction or disruption of community cohesion or a community's economic vitality; destruction or disruption of the availability of public and private facilities and services; vibration; adverse employment effects; displacement of persons, businesses, farms, or nonprofit organizations; increased traffic

congestion, isolation, exclusion, or separation of minority or low-income individuals within a given community or from the broader community; and, the denial of, reduction in, or significant delay in the receipt of benefits of FHWA/USDOT programs, policies, or activities.

Disproportionately high and adverse. The FHWA Guidance and USDOT Environmental Justice Orders state that “disproportionately high and adverse” refers to an adverse effect that (1) is predominately borne by a minority population and/or a low-income population; or (2) will be suffered by the minority population and/or low-income population and is appreciably more severe or greater in magnitude than the adverse effect that will be suffered by the nonminority population and/or non-low-income population. When considering whether an effect is “disproportionately high and adverse,” practitioners should include the community that may be affected in that discussion.

Low-income. The FHWA Guidance and USDOT Environmental Justice Orders define a “low-income” individual as a person whose median household income is at or below the U.S. Department of Health and Human Services (HHS) poverty guidelines. This differs from Council on Environmental Quality guidance on environmental justice, which suggests the use of U.S. Census Bureau poverty thresholds. The HHS website outlines key differences between HHS guidelines and Census guidelines.

Minority. A minority population is any readily identifiable group of minority persons who live in a geographic proximity and, if circumstances warrant, geographically dispersed/transient persons (such as Native Americans or migrant workers) who will be similarly affected by a proposed FHWA program, policy, or activity. A minority is a person who is Black, Hispanic, Asian American, American Indian or Alaska Native (FHWA Order 6640.23A). Hispanic or Latino heritage is considered an ethnicity rather than a racial category in census data; therefore, the minority population is calculated by subtracting persons who are White only and not Hispanic from the total population to avoid double counting.

Populations. For the terms “minority” and “low-income,” the FHWA Guidance and USDOT Environmental Justice Orders define a “population” as any readily identifiable group of minority and/or low-income persons who live in geographic proximity, and, if circumstances warrant, geographically dispersed/transient persons of those groups (such as migrant workers, homeless persons, or Native Americans) who will be similarly affected by a proposed FHWA/USDOT program, policy, or activity.

Socioeconomics. Socioeconomics is defined as the basic attributes and resources associated with the human environment, particularly characteristics of population and economic activity. Regional birth and death rates and immigration and emigration affect population levels. Economic activity typically encompasses employment, personal income, and industrial or commercial growth. Changes in these fundamental socioeconomic indicators are typically accompanied by changes in other components, such as housing availability and the provision of public services.

4.1 Minority Populations

Minority populations are identified using U.S. Census Bureau census block groups where the proportion of minority persons exceeds the threshold defined by the reference population, Adams County. The proportion of the minority population within Adams County is 46.8 percent; therefore, this analysis is focused on census block groups where the minority population is at or above 46.8 percent.

Table 7 provides a breakdown of reference populations and the two census block groups that represent the community study area. The census block groups have a 70 and 71.8 percent minority population,

which exceeds the threshold of 46.8 percent; therefore, both census blocks are considered to have an environmental justice minority population. The EJSCREEN Tool was used to verify that the 2010 Census data was still accurate enough to determine if environmental justice minority populations exist within the community study area. The EJSCREEN Tool reported that 76 percent of the population within the approximate community study area was considered minority. The EJSCREEN Tool used 2012-2016 ACS 5-year estimate data (accessed April 19, 2019).

Table 7. Minority Populations

Area	Race, Non-Hispanic (Percent)						Hispanic/Latino (Percent)	Total Minority (Percent)	
	White	Black/African America	American Indian and Alaska Native	Asian	Native Hawaiian and Pacific Islander	Other			Two or More Races
Colorado	70	3.8	0.6	2.7	0.1	0.2	2	20.7	30
Adams County	53.2	2.8	0.6	3.5	0.1	0.2	1.7	38	46.8
Commerce City	45.8	2.8	0.5	2.1	0.1	0.2	1.7	46.8	54.2
Census Tract 88.01, Block Group 1	30	0.8	0.4	0.1	0	0.1	1	67.5	70
Census Tract 88.02, Block Group 1	28.2	1	0.6	0.4	0	0.1	0.8	69.1	71.8

Source: U.S. Census Bureau, 2010. 2010 Census, Summary File 1, P5, Accessed April 19, 2019.

4.2 Low-Income Populations

The median household income within the community study area is considerably less than that of Colorado, Adams County, and Commerce City. According to 2013-2017 ACS 5-year estimates data (U.S. Census Bureau, 2017), the median household income for Colorado, Adams County, and Commerce City are \$65,458, \$64,087, and \$69,268, respectively. The median household income for the block groups within the community study area ranges from \$29,700 to \$44,426.

CDOT's environmental justice guidelines define low income using a combination of the U.S. Census average household size data and the income limits set annually by the U.S. Department of Housing and Urban Development (HUD). Low-income populations are identified in census tracts where the proportion of low-income households exceeds the threshold defined by the area of comparison, Adams County.

This analysis used a combination of 2010 census average household size data, 2013-2017 ACS 5-year estimates data, and 2018 income limits for the Denver-Aurora-Lakewood Metropolitan Statistical Area set by HUD. HUD limits were used for the analysis because, unlike poverty thresholds provided by the U.S. Census Bureau, they are specific to a geographic region, and consequently, adjust for the cost of living. HUD defines low-income as individuals or households earning less than 30 percent of the Area Median Income of a community. Therefore, an income limit of 30 percent with an adjusted household size was used in this analysis.

The average household size for Adams County is 2.85 people (Table 3). The 2018 HUD 30 percent income limits for a two-person and three-person family are \$21,600 and \$24,300, respectively. The 30 percent adjusted income limit for Adams County with a household size of 2.85 is \$23,895. The Adams County adjusted income limit fits in the 2017 Household Income bracket of \$20,000 and \$24,999 Adams County estimates from the U.S. Census Bureau. That bracket and brackets with lower income were combined to determine the percent of households under HUD’s 30 percent low-income limit.

The 2013-2017 ACS 5-year estimates data (U.S. Census Bureau, 2017) on annual household income indicates that 15.0 percent of households within Adams County have incomes below \$24,999 and are considered low-income households; therefore, this analysis focused on identifying census block groups where the proportion of low-income households exceeds 15.0 percent. The proportion of low-income households for census block groups within the community study area is presented in Table 8. Census Tract 88.01, Block Group 1 has 31.5 percent of its households under HUD’s 30 percent limit, over double that of the same metric for Adams County. Census Tract 88.02, Block Group 1 has 19.9 percent of its households under HUD’s 30 percent limit. Both census block groups within the community study area have a greater proportion of low-income households than Adams County’s 15 percent; therefore, they are considered to have an environmental justice low-income population.

Table 8. Median Household Income and Percent below HUD’s Income Limit

Geography	*Median Household Income	**Households Below 30 Percent HUD Income Limits (Percent)
Adams County	\$64,087	15.0
Commerce City	\$69,268	12.2
Census Tract 88.01, Block Group 1	\$44,426	31.5
Census Tract 88.02, Block Group 1	\$29,700	19.9

*U.S. Census Bureau, 2017. American Community Survey, 2013-2017 5-year Estimates, B19013, Accessed April 21, 2019.

**U.S. Census Bureau, 2017. American Community Survey, 2013-2017 5-year Estimates, B19011, Accessed April 21, 2019.

4.3 Limited English Proficiency Populations (LEP)

Federal agencies are directed to examine LEP populations. Languages for LEP individuals can be a barrier for accessing important DOT employment or services, understanding and exercising important employment rights, complying with applicable responsibilities, or understanding other information provided by federally funded programs and activities.

Census data was collected for the community study area to identify the presence of LEP households. Data for LEP-speaking households is available at the census tract level in 2013-2017 ACS 5-year estimates using the S1602 (Limited English Speaking Households) dataset (U.S. Census Bureau, 2017). The percent of households within Colorado that are LEP households is 2.9 percent. Within Adams County, 5.5 percent of households are considered to be LEP households, and within Commerce City 5.2 percent of households are considered to be LEP households. Within the community study area, Census Tracts 88.01 and 88.02 have 8.5 and 12.3 percent LEP households, respectively. Both tracts exceed the

Adams County percentages. Nearly all of the LEP households within the Census tracts speak Spanish; less than 1 percent of the households speak a different language.

4.4 Environmental Justice Population Resources

Businesses and community facilities (Figures 7 and 8) in the community study area have been treated as environmental justice resources. Many of these facilities serve the community study area or employ residents from the community study area, and these properties are important to community cohesion and community character. This includes but is not limited to the Mile High Flea Market and 88 Drive-In Theatre, which in addition to being regional draws are also important to the community study area because they provide services and employment.

4.5 Environmental Justice Outreach

Several outreach strategies were used to target outreach to minority populations, low-income populations and non-English speakers. Spanish translation was offered at the in-person public meeting and the online public meeting, stakeholder meetings, and the block-by-block meetings. Outreach materials were also provided in Spanish. No requests for additional Spanish or other non-English translation services were received. The project was also promoted on a local Spanish-language broadcast radio station by Project Vision 21 on two occasions, included in the Project Vision 21 podcast and social media outlets, and promoted through an online Spanish-language broadcast. Input received from these outreach activities, especially from the local community, were considered, and when possible, incorporated into the project design. The design was developed to accommodate input to include a sidewalk extension to Ministerio Palabra De Vida Church, add pedestrian crossings of E. 88th Avenue near the Mile High Flea Market, and add new pedestrian facilities connecting the RTD Route 88 bus stops to employers east of Rosemary Street.

The public involvement activities are fully documented in the Public Involvement appendix (Appendix C) to the *88th Avenue (I-76 to Highway 2) Environmental Assessment*. The outreach activities tailored to engage the local environmental justice communities are summarized in the following sections.

4.5.1 Stakeholder Interviews

At the onset of the NEPA process, a series of 10 stakeholder interviews were held with community stakeholders and representatives that were identified with the assistance of the project community liaison. The purpose of the stakeholder interviews was to better understand community sentiments about existing conditions along E. 88th Avenue, community resources within the vicinity of E. 88th Avenue, and infrastructure development in Commerce City. Common topics brought up by the stakeholders are listed below. The list of stakeholders and full meeting minutes are located included in the *Social and Political Risk Assessment* that is part of the Public Involvement appendix (Appendix C) to the *88th Avenue (I-76 to Highway 2) Environmental Assessment*.

- ◆ The at-grade UPRR crossing is a primary cause of the congestion.
- ◆ The community is physically divided north and south of E. 88th Avenue.
- ◆ Commerce City could improve their development process by providing more opportunities for engagement on these type of projects in the community.
- ◆ Most stakeholders are in favor of widening E. 88th Avenue.

4.5.2 Public Meeting

A public meeting was held at Tradicion Bar and Event Center, located within the community study area, on March 27, 2019. Display boards in English and Spanish depicted a project overview, project purpose and need, a summary of potential improvements, project development steps, a summary of outreach, and description of existing conditions. The public meeting was promoted via social media, distribution of over 4,000 mailers and door hangers (English and Spanish), the Commerce City local newsletter, a press release, local radio announcements, and a variable message sign. A total of 27 people signed in, although it is estimated that approximately 40 people attended. Comment cards were provided in English and Spanish, 10 of which were filled out and returned; and the study team kept notes of conversations and verbal comments made by attendees. Specific comments from a Mile High Flea Market employee, the Wikiup Mobile Home Park Manager, 88 Drive-in Theatre owner, and residents along Laurel Drive and Rosemary Street provided insights into how the local community feels about the proposed improvements.

The online public meeting launched on the project website (www.c3roadwayimprovements.com) on Monday, June 22, 2020, and closed on Friday, August 7, 2020. The meeting provided an update to the E. 88th Avenue Widening Project Purpose and Need and project design and introduced the adjacent Rosemary Street Widening Project. Information for each project was posted on a separate page of the online meeting to avoid confusion. A survey was conducted to gather input from the public on the projects. The meeting was presented in English and Spanish, and was promoted through the following outlets.

- ◆ Postcard mailers
- ◆ Social media
- ◆ Website
- ◆ Press release
- ◆ Email to stakeholders
- ◆ Commerce City newsletter

The online meeting had 159 visitors, 10 survey responses, 10 emails, and 2 comments. A summary and archive of materials and comments from the public open house and public online meeting are located in Appendix C of the *88th Avenue (I-76 to Highway 2) Environmental Assessment*.

4.5.3 Block-by-Block Meetings

Five block-by-block meetings occurred with property owners, operators, and residents along E. 88th Avenue and Rosemary Street. The preliminary design options were discussed, and opinions and concerns were solicited. Some of the businesses noted that they employ local residents and discussed right-of-way requirements and logistics during and after construction with the study team.

4.5.4 Project Website and Online Survey

Commerce City has a project-specific website on its municipal capital projects website. The website promoted an online survey; provides the project goals; houses public meeting materials, an informational video, and the project timeline; and has the ability for citizens to submit comments online. A 10-question online survey was launched at the onset of the project development process. The survey had 134

responses. A summary of the survey results is located in Appendix C of the *88th Avenue (I-76 to Highway 2) Environmental Assessment*.

4.5.5 Social Media

Social media was used to build project awareness and promote opportunities for public engagement. Commerce City posted project information and updates through their communication outlets, including Facebook, Twitter, and NextDoor.

4.5.6 Community Events

The study team attended the following two community events to provide information about the project:

- ◆ Touch-A-Truck, June 25, 2019
- ◆ Neighborhood Outreach at Pioneer Park, August 8, 2019

4.6 Environmental Justice Impacts Evaluation

Census Tract 88.01, Block Group 1 and Census Tract 88.02, Block Group 1 were evaluated for the environmental justice component of this report. The two parcels at the west end of the community study area between Brighton Road and the I-76 northbound off ramps are outside of the noted census block groups. Demographic and community characteristics were not determined for the associated block group because the Proposed Action would not have the potential to affect the rest of the block group.

Both census block groups that comprise the community study area (Figure 2) were determined to contain low-income and minority environmental justice populations. Therefore, in addition to describing the socioeconomic impacts, a determination as to whether these populations would bear disproportionately high and adverse human-health or environmental effects due to the implementation of the Proposed Action has been made and is described in this section. These determinations were made through an examination of the right-of-way acquisition impacts, traffic noise impacts, transportation system impacts, indirect impacts to land use, temporary (construction) impacts, offsetting project benefits, and environmental-justice-specific public outreach and input in the decision-making process.

Since the entire community study area contains environmental justice populations, Proposed Action impacts (direct, indirect and construction) would affect minority and/ or low-income populations; however, the severity of identified impacts to the community as a result of this Proposed Action are expected to be low. Proposed Action impacts and benefits previously discussed in detail are summarized below.

4.6.1 No-Action Alternative Impacts

The No-Action Alternative would not improve vehicular mobility through the community study area or provide safe multimodal accommodations that would promote connectivity between residential areas and the various resources within the community study area. It would be inconsistent with local economic and land use plans that call for redevelopment in the area. Without implementation of the Proposed Action, redevelopment would likely occur at a slower rate than with implementation of the Proposed Action.

4.6.2 Proposed Action Impacts

Direct Impacts

To determine how the Proposed Action would affect environmental justice populations in the community study area, a systematic evaluation was conducted using the environmental justice data presented above that provides the determining factors for defining adverse and high impacts for environmental justice populations, as prescribed by FHWA Order 6640.23A and USDOT. Table 9 summarizes whether the determining factors would create a direct adverse impact to environmental justice populations and if so, whether the adverse impact would be high. Impacts are described in detail below the table.

Table 9. Potential for Direct Adverse Impacts to Environmental Justice Populations

Does the Proposed Action include these Adverse Effects?	Adverse Impact?	If an Adverse Impact occurs, is it High?
Bodily impairment, infirmity, illness, or death	No. There would a greater potential for bodily impairment or death with the No Action Alternative because of the lack of bicycle/pedestrian facilities along the project corridor.	N/A
Air, noise, and water pollution and soil contamination	The Proposed Action would maintain acceptable carbon monoxide (CO) levels at the E. 88th Avenue and Brighton Road intersection, and mobile source air toxics (MSAT) levels would be reduced due to the EPA rules, such as cleaner fuels. In 2040, 28 residential receptors would exceed the Noise Abatement Criteria, so were considered for noise abatement. Noise barriers were not evaluated at 7 receptors because constructing noise barriers at those locations would block local access or would limit sight distance and create safety concerns. Noise barriers were evaluated at 6 locations to reduce impacts at the 21 receptors. Noise barriers at 2 locations were determined not to be feasible and/or reasonable. Noise barriers are recommended at 4 locations and will be further considered in final design. Water pollution would decrease because water quality treatment would be provided. Suspected soil contamination is present along the corridor; however, control measures will be employed to reduce potential exposure.	No
Destruction or disruption of human-made or natural resources	Minor impacts would occur to human-made or natural resources present in the community study area. There is the potential for temporary impacts to the O'Brian Canal or the wetland complex north of Rosemary Street during construction from spills, runoff, and erosion. Vegetation would be removed, but replaced, when possible. The new bicycle/pedestrian facilities would be beneficial for multimodal users as the Proposed Action would improve access and connectivity from the corridor to residential areas, businesses, community resources, bus stops, future multimodal facilities, Highway 2 Multiuse Path, and the Rocky Mountain Arsenal National Wildlife Refuge Perimeter Trail.	No

Table 9. Potential for Direct Adverse Impacts to Environmental Justice Populations

Does the Proposed Action include these Adverse Effects?	Adverse Impact?	If an Adverse Impact occurs, is it High?
Destruction or disruption of community cohesion or a community's economic vitality	The addition of a median along E. 88th Avenue would require some environmental justice populations to travel out of direction in vehicles; however, improved bicycle, pedestrian, and transit facilities would facilitate better multimodal access. Economic vitality would be improved. A partial right-of-way acquisition at the Ministerios Palabra Vida would not hinder operations and would occur outside of existing landscaping.	No
Vibration	No. Based on the Proposed Action, vibration impacts were not evaluated and are not expected to be adverse.	N/A
Adverse employment effects	Mobility, access, and accessibility along the corridor could be temporarily impacted during construction, which could delay employees' commute. However, once constructed, the Proposed Action is expected to improve employee commute times.	No
Displacement of persons	The Proposed Action would not result in residential relocations.	No
Businesses, farms, or nonprofit organizations	No. The Proposed Action would not require relocation of businesses, farms, or nonprofit organizations. Partial acquisitions, including acquisition of some parking spaces at the Mile High Flea Market, are not anticipated to hinder local business operations.	N/A
Increased traffic congestion, isolation, exclusion, or separation of minority or low-income individuals within a given community or from the broader community	A wider E. 88th Avenue could be perceived as a barrier to some pedestrians; however, new and improved crossings for pedestrians would make crossing E. 88th Avenue more convenient, easier, and safer. Better facilities for pedestrians and bicycles would improve multimodal connections to destinations within the community study area.	No
The denial of, reduction in, or significant delay in the receipt of benefits of FHWA/USDOT programs, policies, or activities	No. The Proposed Action does not preclude the receipt of FHWA/USDOT programs, policies, or activities.	N/A

Environmental Justice and Business Impacts

No business displacements are anticipated. Partial right-of-way acquisition, permanent utility easements or temporary construction easements would be required at 20 commercial or industrial properties (Table 2). The Proposed Action would impact approximately 3 percent of the overall parking spaces at Mile High Flea Market. The loss of parking and the amount of right-of-way required would not affect the use or overall operations of the Mile High Flea Market. Partial right-of-way acquisition would be required from several businesses. The amount of right-of-way required would not affect the use, or overall operations, of the various businesses.

Access at some businesses would change to right-in/right-out only movements. However, the affected businesses do not rely solely on drive-by traffic and should not be notably impacted by the change in access.

These business impacts do not constitute an effect predominantly borne by the identified environmental justice population or affect that population appreciably more than it does non-minority or non-low-income populations.

Environmental Justice and Residential Impacts

No residential relocations are anticipated. Partial right-of-way acquisition, permanent utility easements or temporary construction easements would be required at 17 residential properties (Table 2).

The addition of a median along portions of E. 88th Avenue west of Rosemary Street would have a minor impact on access to and from the Wikiup Mobile Home Park and other residences on the southside of the roadway. Only right-in/right-out movements would be allowed at the main entrance to the Wikiup Mobile Home Park and at driveways on the southside of E. 88th Avenue, and access would require permitted U-turns at selected locations. For example, westbound motorists on E. 88th Ave would not be able to turn left into the mobile home park or other residential driveways. Drivers would be required to make a left turn at Brighton Road and a left onto Jolene Court, or a U-turn at Brighton Road, and then make a right-in movement into the mobile home park or residential driveways. Jolene Court will also be improved as part of the Proposed Action.

Traffic noise under the Proposed Action would impact at 28 residential receptors as the total noise would be over the FHWA and CDOT threshold for residences. Of the 28 impacted receptors, Wikiup Mobile Home Park would have 18 residential impacts and J Burrs Mobile Home Park would have one residence impacted. The other 9 impacted receptors are located along E. 88th Avenue near the intersection of Ulster Street, and along Rosemary Street between E. 86th Avenue and E. 84th Avenue. The application of noise barriers would reduce the proposed noise level enough to mitigate the traffic noise impact. At Wikiup Mobile Home Park, the traffic noise would be reduced without noise barriers due to traffic lanes being widened away from residences, but would still be over the threshold that defines impact. The noise barriers would represent a new visual element next to the north side of these two mobile home parks and the residences near Ulster Street. Eight receptors would not warrant the recommendation for noise barriers per CDOT guidance. Noise barriers are being recommended at four locations, but implementation will not be decided until final design.

These residential impacts do not constitute an effect predominantly borne by the identified environmental justice population or affect the environmental justice population appreciably more than it does non-minority or non-low-income populations.

Environmental Justice and Community Facilities Impacts

As shown in Table 2, the Proposed Action would require partial right-of-way acquisition, permanent utility easements and temporary construction easements from the Mile High Flea Market resulting in impacts to their parking lot. However, these changes are not anticipated to negatively impact long-term day-to-day business operations. The Proposed Action would change access at one of two driveways for Ministerio Palabra De Vida. The northern driveway would be limited to right-in/right-out turn movements. Additionally, a partial right-of-way acquisition and temporary easement would be required at the Ministerios Palabra Vida, however it is not anticipated to hinder operations and would occur outside of existing landscaping. Access to the Municipal Services Center Athletic Fields would be restricted or

limited during construction activities along Rosemary Street. Bicycle and pedestrian use of the corridor, some intersecting roadways, the Highway 2 Multiuse Path, and/or informal paths would also be restricted or limited temporarily during construction.

These impacts to community facilities do not constitute an effect predominantly borne by the identified environmental justice population or affect that the environmental justice population appreciably more than it does non-minority or non-low-income populations.

Benefits of the Proposed Action for Environmental Justice Populations

Benefits of the Proposed Action would include:

- ◆ Improved mobility through the community study area for all vehicular traffic with increased roadway capacity, including business-related traffic, emergency medical response units responding to emergencies, transit buses, and local traffic.
- ◆ Improved and safer mobility, access, and connectivity for multimodal users through and across the corridor.
- ◆ Safer access and accessibility for businesses located along Quince Street with the addition of a dedicated westbound acceleration lane and dedicated left-turn lane on E. 88th Avenue.
- ◆ Consistency with local economic, land use, and multimodal planning documents.
- ◆ Improved access to the Mile High Flea Market with a signalized intersection with a left-turn lane, and a dynamic lane to accommodate event traffic.
- ◆ Improved access to the 88 Drive-in Theatre from Rosemary Street with a left-turn lane to accommodate event traffic.

Indirect Impacts

The Proposed Action would benefit environmental justice populations with reduced congestion, improved event access to the Mile High Flea Market and 88 Drive-In Theatre, improved pedestrian and bicyclist safety, and an additional connection to the planned O'Brian Canal trail and the Rocky Mountain Arsenal National Wildlife Refuge Perimeter Trail. The minority and low-income populations would be affected to the same extent by the Proposed Action as non-environmental justice populations with respect to impacts from noise, access and travel patterns, and right-of-way acquisitions.

Construction Impacts

Temporary, short-term impacts to businesses and residents within the community study area would be expected during construction. Temporary effects would include disruption or change in access to area residents, potentially slower emergency response times, an increase in roadway congestion in and around the area, the presence of large equipment, signage and lighting, increase in particulate emissions from fugitive dust and increase in airborne pollution from construction vehicles, and other general disruption to the surrounding area. All travelers within the community study area would experience the temporary negative impacts during construction equally.

Mobility through the community study area would be limited during construction, and access to some businesses and community resources may be affected periodically. Temporary construction easements

would impact some land uses. However, these land uses would return to existing conditions once construction of the Proposed Action has been completed.

Environmental Justice Conclusion

None of the impacts associated with the Proposed Action are considered to be high, and none of the impacts would be appreciably more severe or of a greater magnitude for low-income or minority populations when compared to the general population. In addition, the effects of the Proposed Action are borne by environmental justice and non-environmental justice populations to the same extent. There would be numerous benefits to all populations, including low-income and minority populations. Therefore, the Proposed Action would not cause disproportionately high and adverse effects to low-income, minority, or LEP populations.

While minority and low-income populations are present in the community study area, no notably adverse community impacts are anticipated with the Proposed Action; therefore, impacts to minority and low-income populations would not be disproportionately high and adverse. Benefits and burdens resulting from the Proposed Action are anticipated to be equitably distributed throughout the community study area.

5.0 MITIGATION

Mitigation measures for socioeconomic conditions and social resources as defined in the community study area are presented in Table 10.

Table 10. Summary of Impacts and Mitigation

Mitigation Category	Impact	Mitigation Commitment from Source Document	Responsible Branch	Timing/Phase that Mitigation will be Implemented
Socioeconomic Resources, Environmental Justice	Temporary increase in particulate emissions from fugitive dust and increase in airborne pollution from construction vehicles.	<p>An Air Pollution Emission Notice will be filed.</p> <p>A fugitive dust control plan will be developed and implemented in accordance with Colorado Air Quality Control Commission Regulation No. 1.</p> <p>Best management practices will be applied during construction, including:</p> <ul style="list-style-type: none"> Keep construction equipment well-maintained to ensure that exhaust systems are in good working order. 	City of Commerce City, Contractor	Pre-Construction, During Construction
Community Facilities, Socioeconomic Resources, Environmental Justice, Land Use, Right-of-Way	Permanent partial acquisition of 7 residential, commercial, industrial, and agricultural properties totaling approximately 2.0 acres. Acquisition of permanent utility easements from 13 properties totaling approximately 1.5 acres.	For any person(s) whose real property interests may be impacted by this project, the acquisition of those property interests will comply fully with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (Uniform Act).	City of Commerce City, CDOT Right-of-Way	Pre-construction

Table 10. Summary of Impacts and Mitigation

Mitigation Category	Impact	Mitigation Commitment from Source Document	Responsible Branch	Timing/Phase that Mitigation will be Implemented
	<p>Permanent partial acquisitions from infrastructure land uses (roadway right-of-way, O'Brian Canal, freight rail, water sanitation facility) from 3 properties totaling approximately 0.5 acre. Acquisition of permanent utility easements from 3 properties totaling approximately 7.0 acres.</p> <p>Acquisition of temporary construction easements from 31 properties with residential, commercial, industrial, and agricultural land uses totaling approximately 5.0 acres. Acquisition of temporary construction easements from 4 properties with infrastructure land use totaling approximately 1.0 acre.</p>	<p>The Uniform Act is a federally mandated program that applies to all acquisitions of real property or displacements of persons resulting from federal or federally assisted programs or projects. It was created to provide for and ensure the fair and equitable treatment of all such persons. To further ensure that the provisions contained within this act are applied "uniformly," CDOT requires Uniform Act compliance on any project for which it has oversight responsibility regardless of the funding source. Additionally, the Fifth Amendment of the U.S. Constitution provides that private property may not be taken for a public use without payment of "just compensation."</p> <p>All impacted owners will be provided notification of the acquiring agency's intent to acquire an interest in their property including a written offer letter of just compensation specifically describing those property interests. A right-of-way specialist will be assigned to each property owner to assist them with this process.</p>		

Table 10. Summary of Impacts and Mitigation

Mitigation Category	Impact	Mitigation Commitment from Source Document	Responsible Branch	Timing/Phase that Mitigation will be Implemented
Community Facilities, Socioeconomic Resources, Environmental Justice, Right-of-Way	Approximately 1 acre (3 percent of existing capacity) of parking at the Mile High Flea Market would be removed.	<p>Parking mitigation will be determined during the right-of-way acquisition process and may include:</p> <ul style="list-style-type: none"> Restriping or reconfiguring portions of the parking lot. Compensation. 	City of Commerce City, Colorado Department of Transportation Right-of-Way	Pre-Construction
Community Facilities, Parks, and Recreational Facilities; Historic Resources; Visual	Temporary adverse impacts to visual quality due to material stockpiles, high visibility fencing, dust and debris, and staging areas, including at historic properties.	Stockpile areas will be in containers or neatly organized, cleaned and located in less visibly sensitive areas, and whenever possible, not visible from recreational areas or historic properties. Dust mitigation is addressed by mitigation for air quality.	City of Commerce City, Contractor	During Construction
Community Facilities, Parks, and Recreational Facilities; Socioeconomic Resources, Environmental Justice	Noise increases during construction	<p>Typical best management practices will be incorporated into construction contracts where it is appropriate to do so. These may include:</p> <ul style="list-style-type: none"> Notify neighbors in advance when construction noise may occur. Keep noisy activities as far from sensitive receptors as possible. Use properly designed engine enclosures and intake silencers if appropriate. Place stationary equipment as far from sensitive receptors as possible. 	City of Commerce City, Contractor	During Construction

Table 10. Summary of Impacts and Mitigation

Mitigation Category	Impact	Mitigation Commitment from Source Document	Responsible Branch	Timing/Phase that Mitigation will be Implemented
		<ul style="list-style-type: none"> ▪ Perform construction activities in noise-sensitive areas during hours that are least disturbing to nearby residents. ▪ Perform construction activities next to the 88 Drive-In Theatre outside of normal operation hours or during the offseason. ▪ Coordinate with the 88 Drive-In Theatre owner so that construction impacts to business operations are minimized. 		
Socioeconomic Resources, Environmental Justice, and Land Use	Out-of-direction travel for access to businesses and residential areas due to consolidation of accesses and driveways.	U-turns will be permitted at E. 88th Avenue at Brighton Road and the new Mile High Flea Market signalized intersection.	City of Commerce City	Pre-Construction
Environmental Justice	Permanent increases in noise levels from increased traffic volumes	Noise barriers are recommended at 4 locations to reduce noise where they were found to be feasible and reasonable. Feasibility and reasonableness determinations may change if there are changes in final design after approval of the NEPA documentation. The recommended noise barriers would not be built if the Benefitted Receptor Preference Survey results in 50 percent or less support for the abatement.	City of Commerce City	Pre-Construction

Table 10. Summary of Impacts and Mitigation

Mitigation Category	Impact	Mitigation Commitment from Source Document	Responsible Branch	Timing/Phase that Mitigation will be Implemented
<p>Bicycle, Pedestrian, and Transit Resources; Socioeconomic Resources; Community Facilities, Parks, and Recreational Facilities; Environmental Justice; Land Use</p>	<p>Construction disruptions affecting access and parking at businesses and community facilities, traffic flow, and access and continuity for pedestrians and bicyclists, and transit.</p> <p>Community Facilities with direct access from E. 88th Avenue or Rosemary Street include the following:</p> <ul style="list-style-type: none"> ▪ Mile High Flea Market ▪ Ministerio Palabra De Vida ▪ South Adams Fire Department ▪ Municipal Services Center and Athletic Fields [Section 4(f)] ▪ Highway 2 Multiuse Path [Section 4(f)] 	<p>A Traffic Management Plan will include a construction-related traffic control plan, work zone management strategies, and contingency plans.</p> <p>During construction, the existing number of through lanes will be maintained, except during some off-peak periods or as otherwise agreed with the City of Commerce City.</p> <p>Detour routes will be provided during construction to avoid overloading local streets with detour traffic.</p> <p>Roadway work zone conditions and detour information will be communicated to travelers and the local businesses and residents using the project website, social media, pre-recorded messages, variable message signage, and other similar mechanisms.</p> <p>Access to local businesses, community facilities and environmental justice population facilities during business hours and residences will be maintained during construction.</p>	<p>City of Commerce City, Contractor</p>	<p>Pre-Construction, During Construction</p>

Table 10. Summary of Impacts and Mitigation

Mitigation Category	Impact	Mitigation Commitment from Source Document	Responsible Branch	Timing/Phase that Mitigation will be Implemented
		<p>Pedestrian and bicyclist access and connectivity along the Highway 2 Multiuse Path will be maintained during construction. No more than half of the total width of the path will be restricted at any time.</p> <p>Following construction, the Highway 2 Multiuse Path will be fully restored, cleaned of debris from construction and replanted with grass in accordance with its previous condition and left as good as or better than it was before construction began.</p> <p>Pedestrian and bicyclist access along E. 88th Avenue will be maintained during construction to the extent practicable.</p> <p>Commerce City will coordinate with Regional Transportation District so that Route 88 transit service is maintained at the two Brighton Road bus stops just south of E. 88th Avenue.</p>		

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