



E **88TH** AVE
8800 N

I-76 NB RAMPS TO HIGHWAY 2



CUMULATIVE EFFECTS

May 2021

Prepared for:
City of Commerce City



ENVIRONMENTAL ASSESSMENT



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Acronyms and Abbreviations

AASHTO	American Association of State Highway and Transportation Officials'
APE	Area of Potential Effects
BNSF	BNSF Railway
CDOT	Colorado Department of Transportation
CEQ	Council on Environmental Quality
Commerce City	City of Commerce City
DRCOG	Denver Regional Council of Governments
E. 86th Avenue	East 86th Avenue
EA	Environmental Assessment
FHWA	Federal Highway Administration
I-25	Interstate 25
I-76	Interstate 76
NB	Northbound
NEPA	National Environmental Policy Act
UPRR	Union Pacific Railroad

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1.0 INTRODUCTION

A cumulative effect “results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions and regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time” (40 Code of Federal Regulations [CFR] § 1508.7).

Cumulative impacts occur when the impacts of a federal action are added to or interact with the impacts of other actions, including past, present, and reasonably foreseeable future actions. The cumulative impacts can be viewed as the total impacts on a resource, ecosystem, or human community of the federal action and all other activities affecting that resource.

In guidance from the Council on Environmental Quality (CEQ), cumulative impact analysis should be limited to “important issues of national, regional, or local significance” (CEQ, 1997). Accordingly, not all resources identified for impact analysis in the Environmental Assessment (EA) are also analyzed for cumulative effects. Geographic and temporal limits for this analysis are defined in Section 6. Because of the broader geographical and temporal limits used for cumulative analysis, impacts are commonly examined on a qualitative basis and often with less detailed analysis than direct impacts analysis of alternatives or resources. For this Proposed Action, the following resources were analyzed for cumulative impacts:

- ◆ Land Use
- ◆ Cultural Resources
- ◆ Visual
- ◆ Socioeconomic Resources and Environmental Justice

This document discusses the regulatory setting, and describes the cumulative effect of the No-Action Alternative and the Proposed Action on the resources listed above.

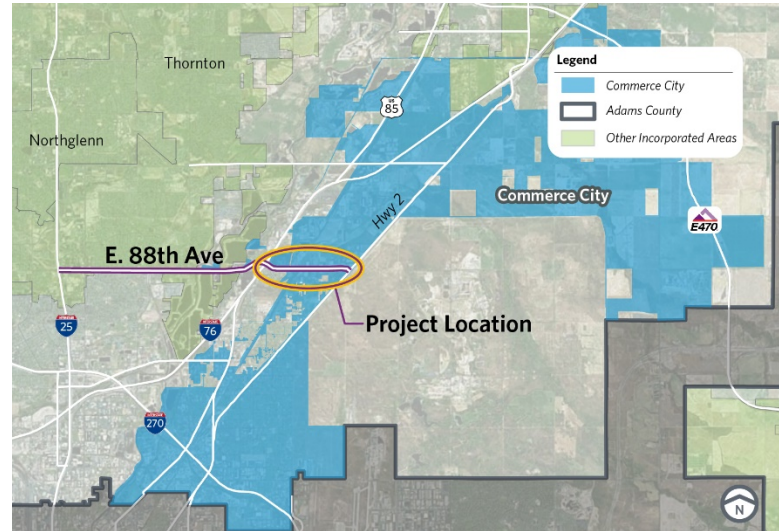
2.0 REGULATIONS

This resource analysis follows guidance contained in the implementing regulations for (National Environmental Policy Act (NEPA) Cumulative Impact (40 Code of Federal Regulations 1508.7), the CDOT NEPA Manual (CDOT, 2017), and the American Association of State Highway and Transportation Officials’ (AASHTO) Practitioner’s Handbook: Assessing Indirect and Cumulative Impacts under NEPA (AASHTO, 2011).

3.0 PROJECT BACKGROUND

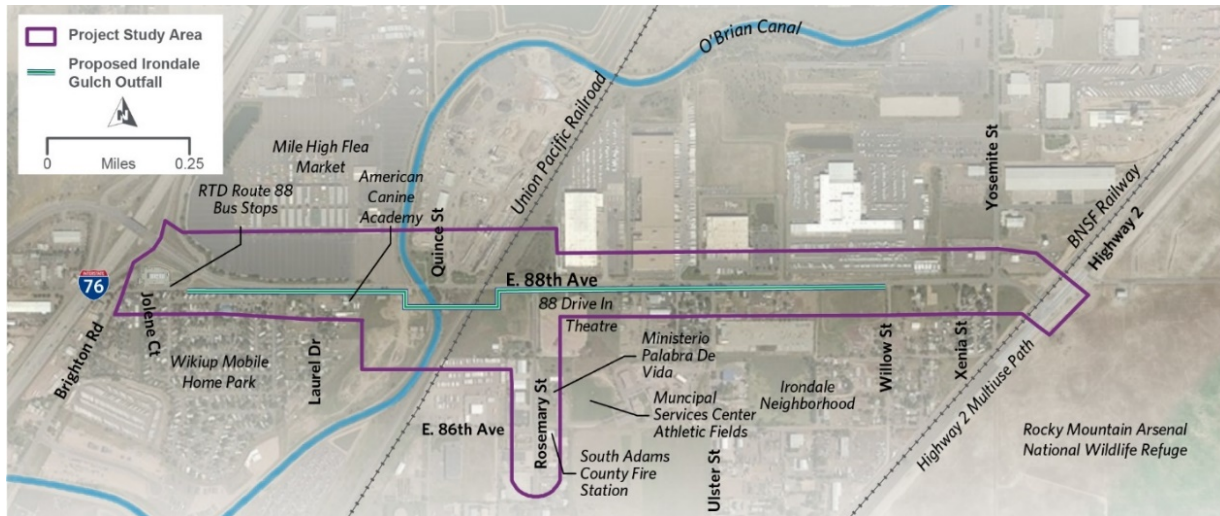
The City of Commerce City, in consultation with the Federal Highway Administration (FHWA) and the Colorado Department of Transportation (CDOT), is proposing to improve approximately 1.6 miles of East 88th Avenue (E. 88th Avenue) between Interstate 76 (I-76) and Highway 2, and on Rosemary Street between E. 88th Avenue and East 86th Avenue (E. 86th Avenue). This Environmental Assessment (EA) describes the Purpose and Need, alternatives considered, the Proposed Action, environmental effects and mitigation, and the public and agency involvement process for the E. 86th Avenue (I-76 to Highway 2) Project (project).

Figure 1. E. 88th Avenue Location Map



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 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. Geographic and temporal limits for this analysis are defined in Section 6.

Figure 2. Project Study Area



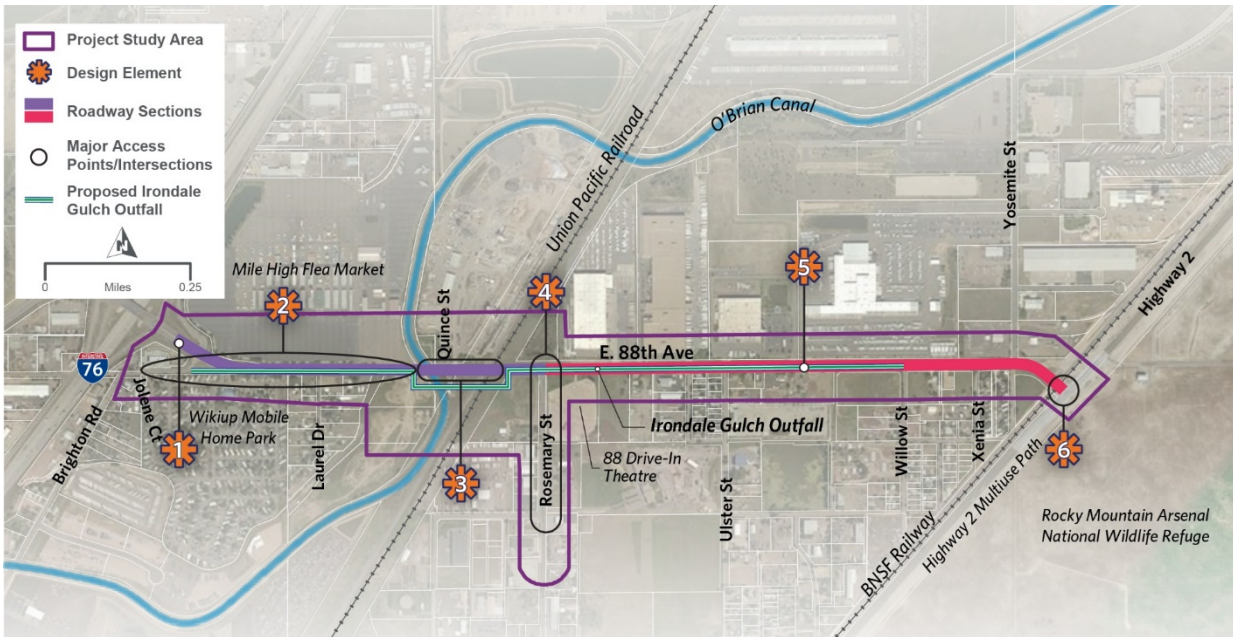
4.0 NO-ACTION ALTERNATIVE

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.

5.0 PROPOSED ACTION

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 locations of the major design elements that comprise the Proposed Action are numbered from west to east in Figure 3.

Figure 3. 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 railroad tracks and Highway 2.

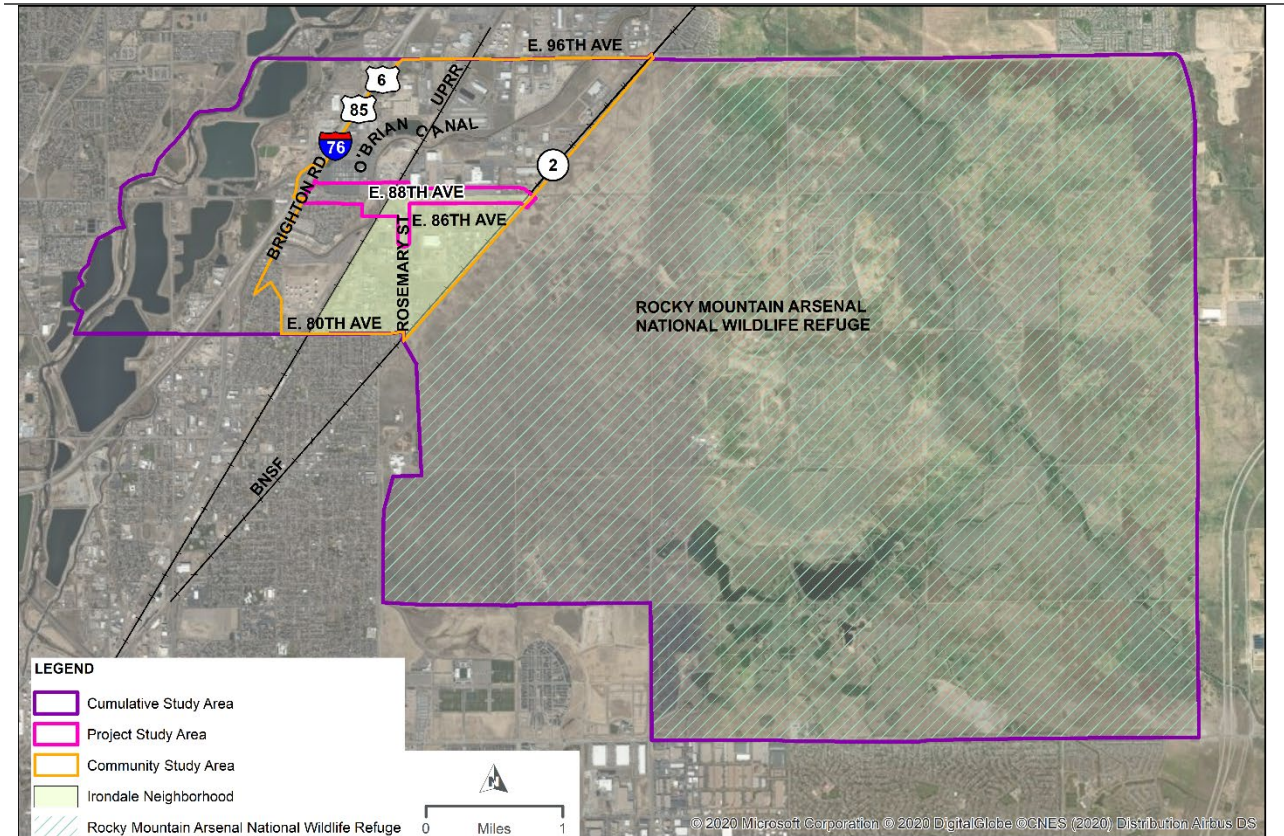
Stormwater Drainage and Water Quality Treatment – Section of Irontdale Gulch Outfall would detain stormwater and water would be treated within the proposed right-of-way.

6.0 GEOGRAPHIC AND TEMPORAL LIMITS

The geographic limits of analysis for cumulative impacts are typically broader than the project study area for direct effects to fully encompass the resources included in the analysis (cumulative study area). Although each resource for analysis is considered separately, a cumulative impact analysis study area has been developed. The cumulative study area is depicted in Figure 4 and generally described as bounded by the South Platte River corridor to the west, the Rocky Mountain Arsenal National Wildlife Refuge (Arsenal site) to the east, E. 80th Avenue to the south, and E. 96th Avenue to the north. This cumulative study area fully encompasses the study areas used for the land use, cultural resources, visual

resources, and socioeconomic and environmental justice assessments, cited below. Furthermore, it approximates the greatest extent of impacts to systems being considered under the cumulative impact analysis.

Figure 4. Cumulative Study Area



The temporal limits of analysis begin 50 years ago from present and extend into the future to 2040. One of Commerce City’s original communities, the Irondale Subdivision, in the cumulative study area was initially platted in 1889, but by the middle of the twentieth century, the nineteenth century development trends based on agriculture and pockets of residential uses had largely been supplanted by industrial and commercial development. Accordingly, the 50-year mark (1970) was used as the past limit as it represents a reasonable point in time of establishing baseline development trends that continue to present day. An end future date of 2040 was chosen as it represents the current transportation planning horizon. Therefore, the timeframe for cumulative impacts analysis established for this analysis is approximately 1970 to approximately 2040.

7.0 LAND USE

The *88th Avenue (I-76 to Highway 2) Environmental Assessment Community Understanding Technical Report* (Commerce City, 2021a), includes a comprehensive analysis of land use. The report concludes that the Proposed Action would require the acquisition of property and conversion of existing and future land uses to transportation right-of-way. The Proposed Action would require partial permanent acquisition

from 15 parcels and permanent easement acquisition from 17 parcels. These acquisitions would result in converting approximately 11 acres of existing and future land use to transportation use. 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 (including 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 compatible with the planned future land use within the vicinity of the Proposed Action.

7.1 Past to Present Land Use History and Actions

Table 1 shows past land use development events and trends by decade.

Table 1. Overview of Past to Present Land Use Events and Themes by Decade

Period	Land Use Overview
1970s	Modest industrial development north of E. 88th Avenue. Some industrial development in Arsenal site on west side along BNSF track and South Quebec Street.
1980s	Transitioning from limited military use, Shell Chemical Corporation uses a portion of Arsenal site to produce pesticides. The Rocky Mountain Arsenal closed in 1985. Increasing industrial and commercial development north of E. 88th Avenue.
1990s	Arsenal site becomes a National Wildlife Refuge. Gravel operations expand between UPRR and South Platte River. Considerable industrial/commercial development north of E. 88th Avenue.
2000s	Infill of commercial development north of E. 88th Avenue and expansion of existing commercial development. Increasing residential density between E. 80th Avenue and E. 88th Avenue.
2010s	Rocky Mountain Arsenal National Wildlife Refuge (Refuge) visitors center opened in 2011. Annual visitors to the Refuge in 2013 exceeded 300,000; 1 million visitors are anticipated annually by 2020.

Source: Desktop survey using <https://www.historicaerials.com/>, Accessed December 31, 2019.

Following a shift from sparsely developed and predominantly agricultural and residential use to higher-density resident and industrial development in the 1960s, industrial development continued to accelerate between 1970 and 1990. Denser development occurred in previously undeveloped areas north of E. 88th Avenue, and infill development occurred south of E. 88th Avenue. Use of the Arsenal site to the east of the project study area by the Shell Chemical Corporation, and its eventual designation as a National Wildlife Refuge has limited all development east of Highway 2.

7.2 Future Reasonably Foreseeable Actions

Reasonably foreseeable future growth and development was assessed based on current land use planning and zoning. Given the cumulative study area’s proximity to two major highways, two railroad corridors, and an international airport, commercial and industrial uses are anticipated to increase. Development would occur regardless of whether the Proposed Action is implemented, although it may occur at a slower rate under the No-Action Alternative since the Proposed Action is designated as a priority improvement in Commerce City’s *Irondale Neighborhood and Infrastructure Plan* (Commerce City, 2018). The Irondale Plan was developed in 2017 and 2018 to focus infrastructure developments in the

Irondale area. The preferred Future Land Use Scenario outlined in the Irondale Plan calls for service-oriented commercial-and industrial-focused development along E. 80th Avenue and Rosemary Street, blended residential and commercial industrial use east of Tamarac Street and north of 86th Avenue and 87th Avenue, and Industrial focus in the other areas between the UPRR and BNSF corridors and between E. 80th Avenue and E. 88th Avenue. This plan essentially directs infrastructure development to complement the existing trend of the area transitioning to industrial and commercial use from sparser residential and agricultural uses in the first half of the twentieth century.

The Irondale Plan also refers to a potential future railroad spur that would connect the UPRR and BNSF lines and principally serve a new Intsel Steel industrial facility. Future land use projections for the area are predominantly industrial throughout the cumulative study area (excepting the Refuge) with small pockets of residential south of E. 88th Avenue.

Two planned developments are located within the corridor, including a landscape supply retail business south of E. 88th Avenue on the west side of the O'Brian Canal, and a 7-Eleven convenience store and gas station in the southwest quadrant of the E. 88th Avenue and Rosemary Street intersection. These developments would occur under both the No-Action Alternative and the Proposed Action, and are consistent with long-term land use planning.

7.3 Incremental Impact of Proposed Action

Combining the Proposed Action with past, present, and reasonably foreseeable future actions does not introduce substantial changes to historic or future land use trends. Increasing industrial, and to a lesser extent, commercial use has been a trend over the last 50 years that will continue into the foreseeable future. While transportation, infrastructure, and city and county planning all have contributed to this development trend, the project study area accommodates multiple modes including vehicular, heavy trucks, and freight rail corridors and is in proximity to air transportation making it attractive to both commercial and industrial investment. The rise in industrial use over the last 50 years is primarily a consequence of the proximity of transportation routes, and local transportation and infrastructure planning are largely reactionary to the trend. The Proposed Action would not introduce a change in land use nor would they appreciably accelerate existing land use trends.

8.0 CULTURAL RESOURCES

This resource is addressed comprehensively in the technical report: *Historic Resources Survey for the 88th Avenue: I-76 NB Interchange Ramps to Highway 2* project (HDR, 2019), and through consultation between CDOT and the State Historic Preservation Offices, located in Appendix C of the EA. Through the Section 106 process, CDOT has determined that the Proposed Action would have *no adverse effects* on 11 properties eligible for listing on the National Register of Historic Places.

8.1 Past to Present Cultural Resource Considerations

In the past 50 years, the cumulative study area has transitioned from a sparse density, agriculture-focused area with a single community to one predominantly industrial with a few residential pockets bordered by commercial corridors. Because of the low-density development of agricultural and residential areas, industrial and commercial infill development occurred between and around previously developed areas. This development pattern resulted in few impacts to historic resources as new development occurred in previously undeveloped areas. The pattern also created discrete areas with specific

development types and resources. Specifically, the historically platted area of Irondale still contains historic buildings and structures related to early twentieth century agricultural/residential development. The corridors of E. 88th Avenue and Rosemary Street retain commercial development from the 1970s and before. The modern industrial development period since 1976 occurred primarily north of E.88th Avenue with some infill industrial uses between E. 80th Avenue and E. 88th Avenue.

8.2 Future Reasonably Foreseeable Actions

Commerce City's *Historic Preservation Plan* (Commerce City, 2015) details goals and objectives for the community and complements the *C3 Vision Comprehensive Plan* (Commerce City, 2010) to direct historic preservation goals and objectives through 2025. The Plan identified a goal of "preserving and broadening history, arts, and culture," and the Historic Preservation Plan identified several policies and strategies to meet that goal. Two relevant strategies include recognizing original stand-alone communities, like Irondale, and evaluating the significance of historic resources to identify properties and districts for local or National Register designations. Many of the properties constructed prior to 1975 have been surveyed and evaluated for historical significance, including in the above-referenced survey report for this EA. Therefore, it is anticipated that evaluations over the next 20 years will focus on the industrial development that emerged in the latter half of the twentieth century and continued into the twenty-first century. The primary properties associated with industrial development are likely to be north of E. 88th Avenue, in the area dubbed the "Industrial Enclave" by Commerce City (Commerce City, 2010); however, some undeveloped properties do exist south of E. 88th Avenue. Some community resources constructed in the last 20 years of the twentieth century, such as the Mile High Flea Market, may also gain historical significance in the next 20 years.

8.3 Incremental Impact of Proposed Action

Combining the Proposed Action with past, present, and reasonably foreseeable future actions does not introduce substantial changes to historic or future trends regarding cultural resources. The development patterns over the last 50 years have resulted in little loss of historic resources as new infill development has occurred around existing historic development areas. While the setting of the cumulative study area has changed, from sparse, agricultural/residential development to industrial and commercial, these changes have not resulted in demolition or loss of historic resources. While future industrial development may come at the expense of historic resources in historic development areas, it is more likely the trend of infill development on parcels with no previous development or historic resources will continue. Additionally, the Industrial Enclave area north of E. 88th Avenue is expected to continue to be the focus of new industrial development. Commercial development is anticipated to continue along E. 88th Avenue and Rosemary Street, but is unlikely to result in the demolition or replacement of historic resources. Therefore, the Proposed Action would not introduce a new change affecting nor appreciably accelerate trends regarding cultural resources.

9.0 VISUAL RESOURCES

The *88th Avenue I-76 to Highway 2 Environmental Assessment Visual Resources Technical Report* (Commerce City, 2021b), includes an analysis of visual impacts from the Proposed Action. With the exception of recommended noise barriers, which were determined to be a neutral to adverse visual impact, the assessment concludes that the change in visual quality would range from beneficial to neutral. The addition of the recommend noise barriers would impact approximately nine residences at the Wikiup

property, three residences just east of Ulster Street, and five residences at the Yosemite Street property. While the residences would gain noise abatement from the roadway and increased privacy, the recommended noise barriers would obstruct the homeowners' static views of the north and west. Noise barriers are recommended at four locations to reduce noise where they were found to be feasible and reasonable. Recommended noise mitigation will be reviewed during final design to ensure constructability. The actual height, length, and locations of the recommended mitigation may vary for such reasons as terrain, utilities, property owner and benefited receptor desires, or easements.

9.1 Past to Present Visual Resource Considerations

Before the 1970s, the visual character in the cumulative study area was predominantly rural and agricultural landscapes with some suburban residential development and isolated industrial landscapes. Modest industrial development occurred in the 1970s and continued through 2000. By 2000, these semi-rural, agricultural landscapes had become more isolated into pockets, separated by densely developed commercial and industrial areas. The Rocky Mountain Arsenal east of Highway 2 transitioned from military to limited industrial use by the Shell Chemical Company between 1970 and the 1980s. However, development was limited to eastern and southern areas of the Arsenal site. The Arsenal site was formally designated a National Wildlife Refuge in 1992 and remains one of the largest urban refuges in the country (USFWS, 2019). Agricultural fields north of E. 88th Avenue that had largely remained intact through the mid-1990s, by 2000 were supplanted by industrial development.

9.2 Future Reasonably Foreseeable Actions

Development trends affecting visual resources that began towards the end of the twentieth century have continued to the present day. These trends are anticipated to continue in the future but are restricted by past development, and the majority of changes to visual character occurred between 1970 and 1990. Industrial development north and south of E. 88th Avenue has continued and is identified in the *C3 Vision Comprehensive Plan* (Commerce City 2010). The Refuge remains undeveloped, and its current designation as a refuge ensures that it will remain so for the foreseeable future. Visual resources within the cumulative study area are not anticipated to appreciably change in the next 20 years. Industrial and commercial development is likely to continue along E. 88th Avenue and Rosemary Street, but shouldn't change the existing visual character.

9.3 Incremental Impact of Proposed Action

Combining the Proposed Action with past, present, and reasonably foreseeable future actions does not introduce substantial changes to historic or future trends regarding visual resources. As noted, the majority of visual changes resulting from new development in the cumulative study area occurred between 1970 and 1990. While these development trends are anticipated to continue in the future, although at a slower pace, they would not introduce new visual elements that represent a significant change in the area's visual character. The Proposed Action would not introduce a change in nor appreciably accelerate a change in visual character.

10.0 SOCIAL AND ECONOMIC RESOURCES AND ENVIRONMENTAL JUSTICE

The *88th Avenue (I-76 to Highway 2) Environmental Assessment Community Understanding Technical Report* (City, 2021a) used a community study area (shown in Figure 4), and includes a comprehensive analysis of social and economic resources, including environmental justice. Environmental justice refers to social equity in sharing the benefits and burdens of specific projects or programs, which is an important component of all transportation projects. Socioeconomic information was collected for populations within the community study area to develop and understanding of the potential impacts and possible benefits of the Proposed Action to the local community, including any identified minority and/or low-income populations. The report concluded the following:

- ◆ No business relocations.
- ◆ Approximately 3.5 acres of permanent right-of-way acquisition, impacting 15 parcels.
- ◆ Approximately 7.5 acres of permanent easements, impacting 17 parcels.
- ◆ In 2040, 28 receptors would exceed the Noise Abatement Criteria, so were considered for noise abatement per CDOT's *Noise Analysis and Abatement Guidelines* (CDOT, 2015) and FHWA's *Highway Traffic Noise: Analysis and Abatement Guidance* (FHWA, 2011). Noise barriers were not evaluated at seven receptors where they would block local access or create 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 two locations were determined not to be feasible and/or reasonable. Noise barriers are recommended at four locations and will be further considered in final design.
- ◆ Vehicular access impacts to some properties caused by the implementation of a raised median.
- ◆ The raised median will benefit pedestrians by providing a refuge for those crossing E. 88th Avenue.
- ◆ Vehicular access benefited at some properties due to new traffic controls, new dedicated left-turn lanes, or new dedicated acceleration lanes.
- ◆ A new multiuse path and sidewalks would benefit bicycle and pedestrian users.

10.1 Past to Present Social and Economic and Environmental Justice Considerations

As noted previously, the land use in the cumulative study area has transitioned from a semi-rural, agricultural area in the middle of the twentieth century to predominantly industrial and commercial with pockets of residential development. Based on 2010 Census data, the community study area has a higher percentage of Hispanic/Latino population (67.5 to 69.1 percent) than Commerce City (46.8 percent), Adams County (38 percent), and the state (20.7 percent). The community study area also has a higher percentage of households below United States Housing and Urban Development's 30 percent income limits compared to the rest of Commerce City and Adams County. The population of Commerce City decreased slightly between 1970 and 1990 before increasing to approximately 21,000 in 2000 and then more than doubling in 2010 to 45,913 (DOLA, 2019). However, in the same period the population in the Irondale area trended down slightly, from 821 in 2000 to 816 in 2015.

The environmental justice analysis for the EA identified seven environmental justice resources where resource-specific impacts could extend to the larger community:

- ◆ Wikiup and J Burrs Mobile Home Parks
- ◆ Mile High Flea Market
- ◆ 88 Drive-In Theatre
- ◆ Ministerio Palabra De Vida
- ◆ Radiance Church
- ◆ Tradicion Bar and Event Center

10.2 Future Reasonably Foreseeable Actions

The Denver Regional Council of Governments (DRCOG) projects Commerce City's population growing to 71,600 and supplying over 35,200 jobs by 2035 (Commerce City, 2010). The *C3 Vision Comprehensive Plan* (Commerce City 2010) anticipates long-term future needs through 2035 and directs growth and development to meet a diverse set of community enhancement goals identified in 12 plan elements. Comparing population and demographic trends in Commerce City and Irondale, Commerce City is anticipated to continue to grow substantially in the next 20 years with most of that population growth occurring outside of the project study area. Commerce City's greatest changes in population and demographics have occurred since 2000, while population and demographics in Irondale largely remained the same in the same period. The current planning vision for Commerce City would see development associated directly with increased population in other areas. Therefore, based on the Commerce City's future planning and zoning goals, the current demographics in the cumulative study area are not anticipated to change considerably in the next 20 years.

As noted previously, planned industrial and commercial uses are anticipated to increase within the cumulative study area over the next 20 years. Future planning and zoning identify maintaining areas of current residential development, establishing service-oriented commercial corridors on E. 80th Avenue and Rosemary Street, and new industrial development capitalizing on the proximity of various transportation networks. Based on the direction of development, it is anticipated that environmental justice populations will maintain in size and proportion and not appreciably increase.

10.3 Incremental Impact of Proposed Action

The environmental justice analysis determined that environmental justice populations were present in the community study area, and additional analysis was performed to determine if those populations would be disproportionately impacted. Accounting for past and reasonably foreseeable future actions, the current Proposed Action would not cause changes to historical or projected socioeconomic trends nor would it disproportionately affect environmental justice populations. Future planning and zoning goals in the cumulative study area maintain the current residential areas while promoting additional commercial and industrial uses. The Proposed Action is anticipated to improve bicycle and pedestrian access within the cumulative study area and in connection with broader regional multimodal transportation networks, likely resulting in an overall benefit to communities in the cumulative study area. Incremental impacts to environmental justice populations are anticipated to be negligible, and impacts would not disproportionately fall on these populations. The Proposed Action is not anticipated to have an incremental impact on the long-term viability of the above seven facilities serving the environmental justice community. Impacts to the use of and connection between these environmental justice population

resources would be negligible and the broader community would not be altered, and the Proposed Action would result in improved access to some of these properties.

11.0 CUMULATIVE EFFECTS SUMMARY

When combined with other past, present, and reasonably foreseeable future actions, the Proposed Action is expected to have a minor cumulative effect, including benefits, as described above.

12.0 REFERENCES

American Association of State Highway and Transportation Officials (AASHTO). 2011. Practitioner's Handbook: Assessing Indirect and Cumulative Impacts under NEPA.

City of Commerce City (Commerce City). 2010. C3 Vision Comprehensive Plan.
<https://www.c3gov.com/home/showdocument?id=798>.

City of Commerce City (Commerce City). 2015. Commerce City Historic Preservation Plan.
<https://www.c3gov.com/home/showdocument?id=2000>.

City of Commerce City (Commerce City). 2018. Irondale Neighborhood & Infrastructure Plan.
<https://www.c3gov.com/home/showdocument?id=7046>.

City of Commerce City (Commerce City). 2021a. 88th Avenue I-76 to Highway 2 Environmental Assessment Community Understanding Technical Report.

City of Commerce City (Commerce City). 2021b. 88th Avenue I-76 to Highway 2 Environmental Assessment Visual Resources Technical Report.

Colorado Department of Local Affairs (DOLA). 2019. Historical Census Data—Counties and Municipalities. https://demography.dola.colorado.gov/population/data/historical_census/, Accessed December 17, 2019.

Colorado Department of Transportation (CDOT). 2015. Noise Analysis and Abatement Guidelines.

Colorado Department of Transportation (CDOT). 2017. NEPA Manual. August 2017.

Council on Environmental Quality (CEQ). 1997. Considering Cumulative Effects Under the National Environmental Policy Act. https://www.energy.gov/sites/prod/files/nepapub/nepa_documents/RedDont/G-CEQ-ConsidCumulEffects.pdf, Accessed December 17, 2019.

Federal Highway Administration (FHWA). 2011. Highway Traffic Noise: Analysis and Abatement Guidance. December.

HDR, Inc. (HDR). 2019. Historic Resources Survey for the 88th Avenue: I-76 NB Interchange Ramps to Highway 2 Project.

U.S. Fish and Wildlife Service (USFWS). 2019. Rocky Mountain Arsenal website.
https://www.fws.gov/refuge/Rocky_Mountain_Arsenal/visit/visitor_activities.html. Accessed December 2019.