

CDOT PROJECT IM 0703-294

I-70/32nd AVENUE INTERCHANGE ENVIRONMENTAL ASSESSMENT

ENVIRONMENTAL JUSTICE EVALUATION TECHNICAL REPORT

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LIST OF ABBREVIATIONS AND ACRONYMS

ADA	Americans with Disabilities Act
CDOT	Colorado Department of Transportation
CEQ	Council on Environmental Quality
EA	Environmental Assessment
FHWA	Federal Highway Administration
FONSI	Finding of No Significant Impact
HUD	U.S. Department of Housing and Urban Development
I-70	Interstate 70
NEPA	National Environmental Policy Act of 1969
RTD	Regional Transportation District
SH 58	State Highway 58

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1.0 INTRODUCTION

In accordance with the National Environmental Policy Act of 1969 (NEPA) and its related regulations, the Federal Highway Administration (FHWA) as the Lead Agency, in cooperation with Colorado Department of Transportation (CDOT) as the Applicant Agency, is preparing an Environmental Assessment (EA) for proposed improvements to the Interstate Highway 70 (I-70)/32nd Avenue Interchange (see **Figures 1-1 and 1-2**). The project is proposed by the City of Wheat Ridge. The detailed information included in this report was incorporated into the EA.

The purpose of this Environmental Justice Evaluation Technical Report is to review the proposed I-70/32nd Avenue Interchange project in sufficient detail to determine whether the Proposed Action is likely to have disproportionately high and adverse impacts on minority or low-income populations. Environmental justice refers to social equity in sharing the benefits and the burdens of specific projects or programs. Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority and Low-Income Populations*, was issued in 1994 to address this. The Executive Order directs that each federal agency make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations.

This technical report describes the demographics in the vicinity of the Proposed Action. To provide a meaningful and focused analysis, a community study area (see **Figure 1-3**) has been identified, including census block groups that are within and adjacent to the proposed project. The community study area is larger than, but still contains, the project area referenced in the EA and was selected to provide a focused characterization of the populations that would be most affected by the project. As appropriate, comparison data for the State of Colorado and/or Jefferson County are also provided.

An understanding of the demographic character of the area is important to provide a basis for assessing impacts to the local community. It is also important in evaluating the project with regard to environmental justice requirements. A discussion of environmental justice requirements and principles is provided below, followed by the demographic analysis.

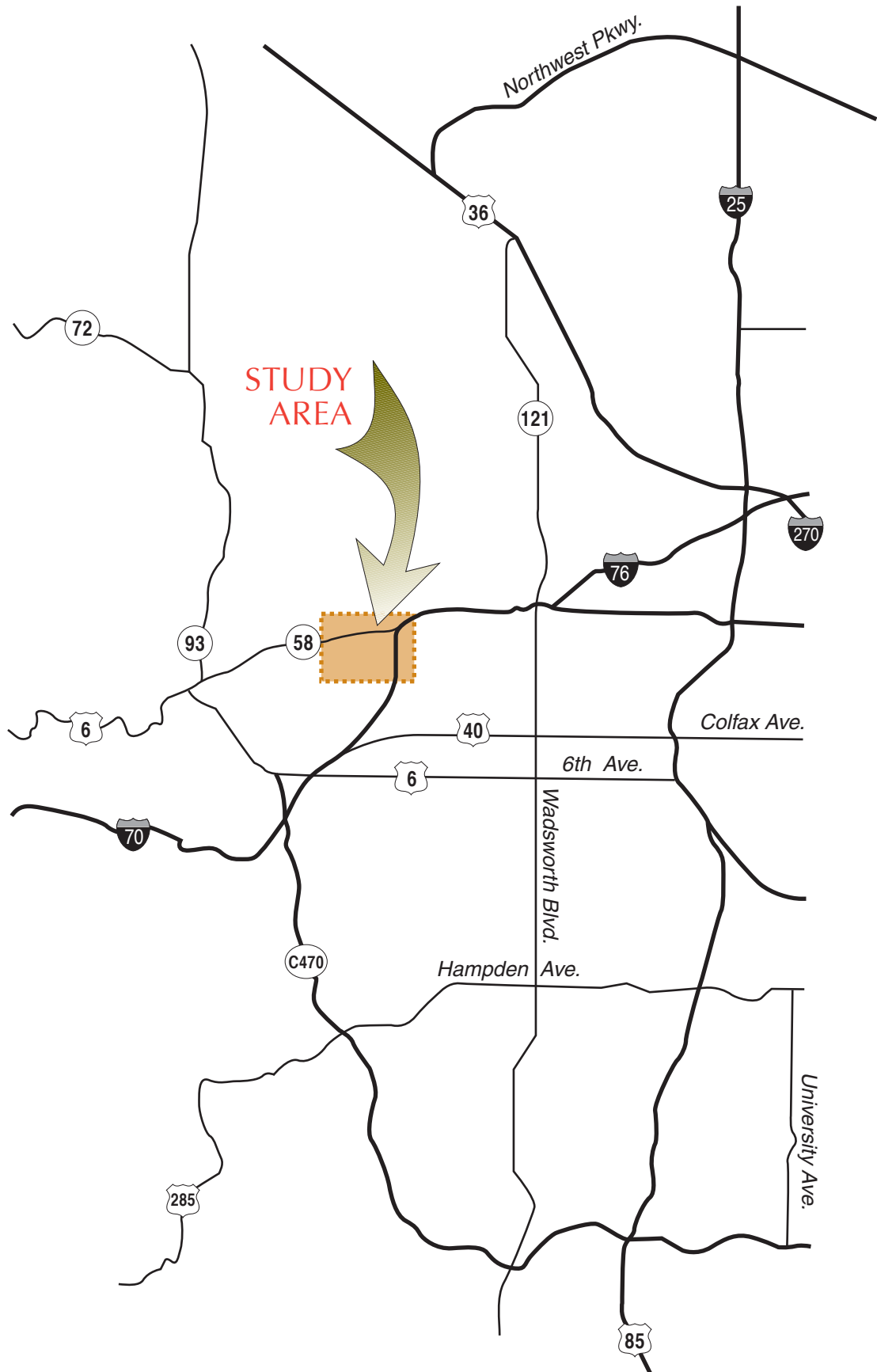


Figure 1-1

Project Location



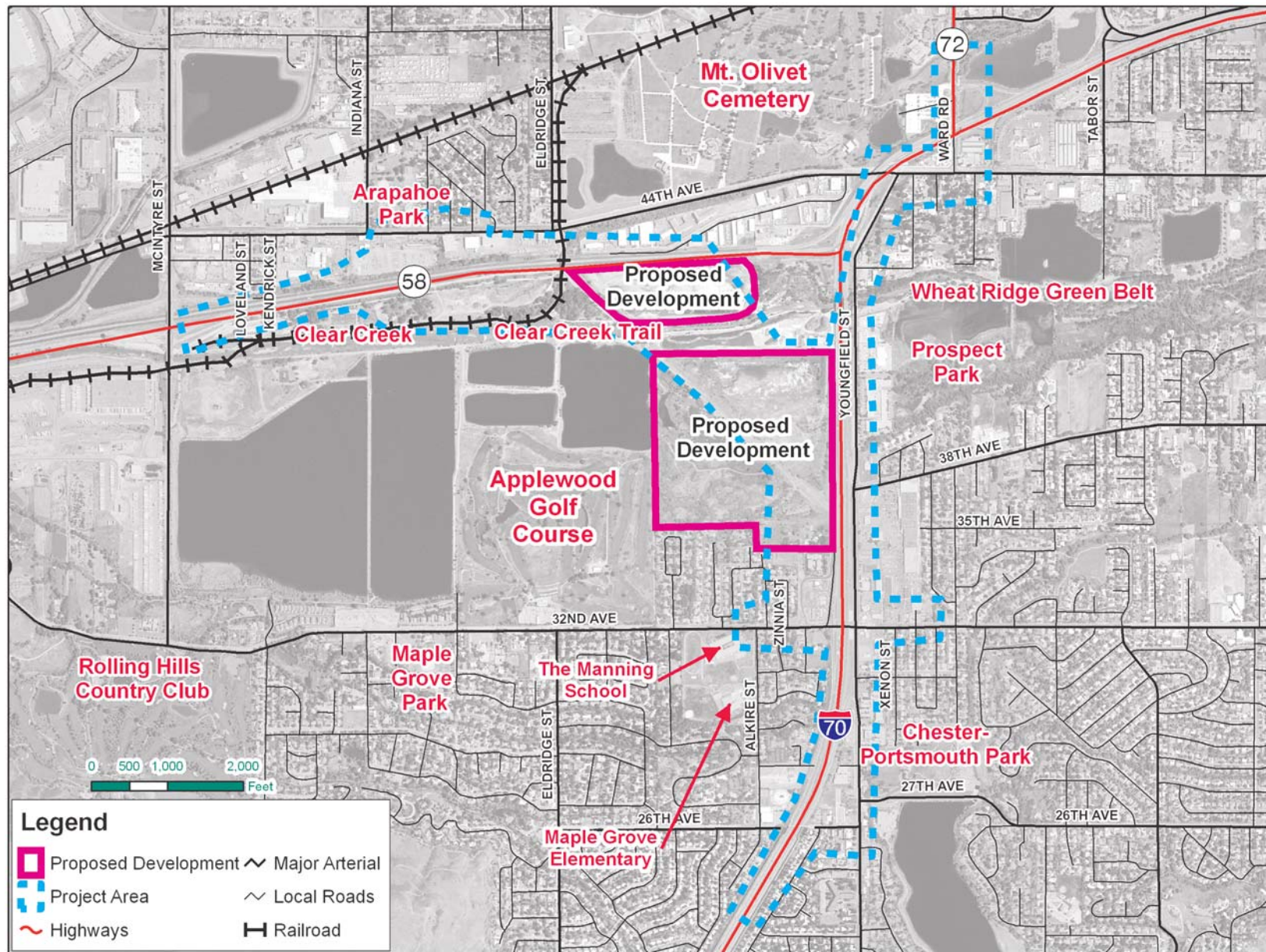
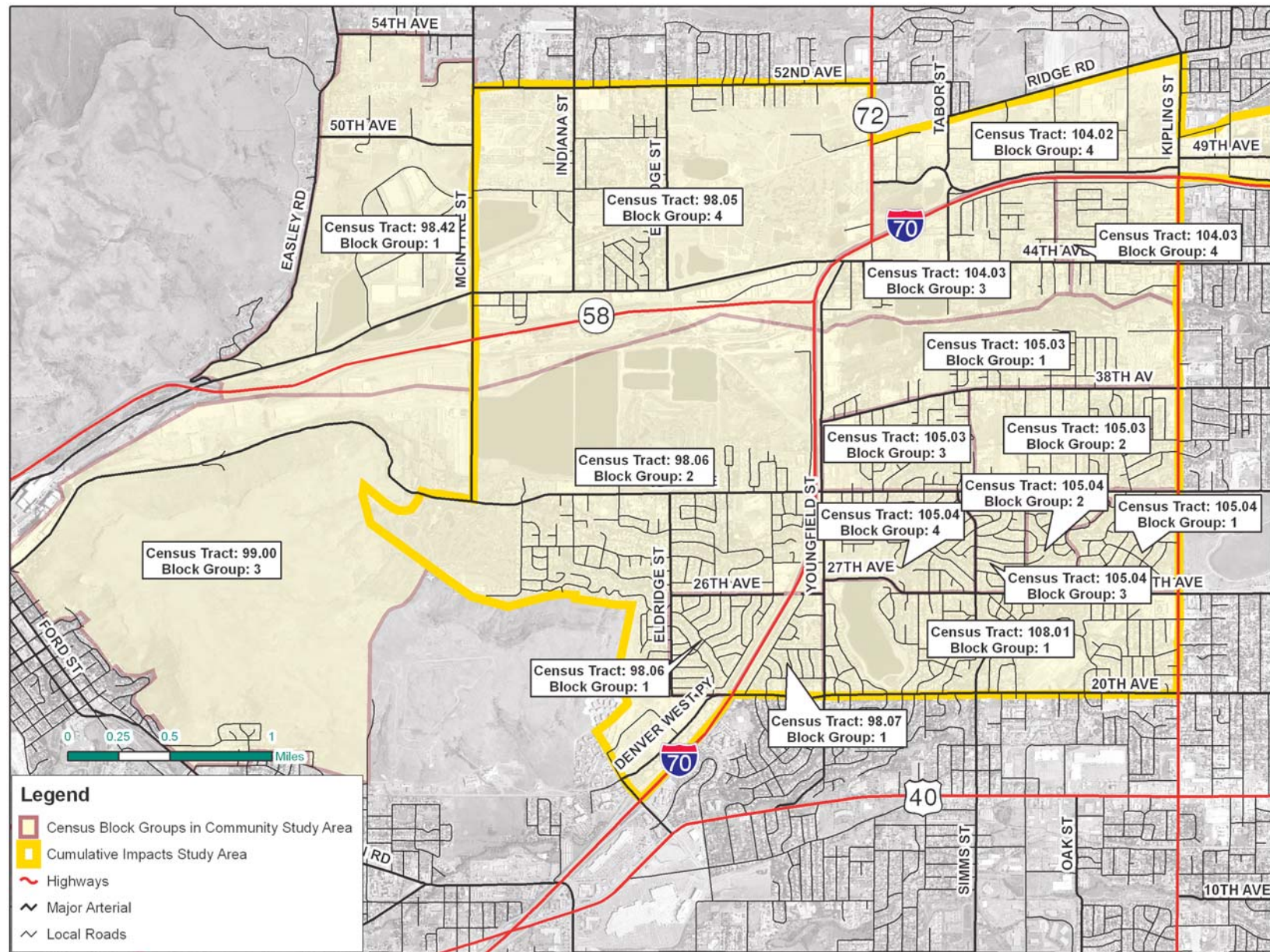


Figure 1-2
Project Area





North SOURCE: U.S. Census 2000

Figure 1-3

Community Study Area

2.0 LOCATION

The I-70/32nd Avenue Interchange project is located in the western part of the Denver metropolitan area, as shown in **Figure 1-1**. The project area falls partially within the cities of Wheat Ridge and Lakewood and within unincorporated Jefferson County (see **Figure 1-2**). The City of Arvada is located north of the project area, and the City of Golden is located to the west.

The project area includes approximately two miles of I-70 from 26th Avenue to Ward Road and two miles of SH 58 from McIntyre Street to I-70. The areas adjacent to these highways are also included. The limits of the project area are shown on **Figure 1-2**.

SH 58 is located in the northern portion of the project area and extends west from the I-70/SH 58 interchange complex. I-70 is generally oriented east-west to the east of the I-70/SH 58 interchange and north-south to the south of the I-70/SH 58 interchange. Clear Creek parallels SH 58 to the south through the project area, crossing beneath I-70 south of the I-70/SH 58 interchange. 32nd and 44th Avenues extend east/west through the project area. Youngfield Street parallels I-70 in a north-south direction on the east side of the project area from 44th Avenue to 26th Avenue, and continuing south.

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3.0 DESCRIPTION OF THE PROPOSED ACTION

The purpose of the Proposed Action is to relieve traffic congestion at the I-70/32nd Avenue interchange and to address future transportation demands on the interchange and local street network due to regional growth and expanding local retail development. To address these issues, improvements to the following transportation facilities are being considered by FHWA and CDOT as part of this I-70/32nd Avenue Interchange EA:

- ▶ I-70/32nd Avenue interchange
- ▶ SH 58 from McIntyre Street to I-70
- ▶ Adjacent portions of 32nd Avenue between Alkire Street and Xenon Street, Youngfield Street between 35th Avenue and 27th Avenue, the Youngfield Street/27th Avenue intersection, and a proposed Cabela Drive from 32nd Avenue to approximately 40th Avenue and from just north of Clear Creek to 44th Avenue.

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4.0 PROJECT ALTERNATIVES

The I-70/32nd Avenue Interchange improvement process began with the development of a broad range of alternatives. The *I-70/32nd Avenue Interchange System Level Feasibility Study* (FHU 2005) examined 21 alternatives and nine sub-alternatives. The System Level Feasibility Study, which was approved by the Colorado Transportation Commission in September 2005, advanced three alternative packages for further study in the EA. Technical screening and evaluation narrowed down the list of alternatives and resulted in identification of the Proposed Action, which is described in this section.

The City of Wheat Ridge submitted an application to CDOT for construction of a series of local agency projects that were common to each of the three alternative packages and that would be independent and stand on their own merits should no other improvements take place. The local agency projects do not preclude any of the alternatives evaluated in the EA. The local agency projects include:

- ▶ Construction of the 40th Avenue underpass of I-70
- ▶ Widening of the Youngfield Street from 38th Avenue to 44th Avenue
- ▶ Construction of Cabela Drive from 40th Avenue to the proposed development just north of Clear Creek

These local agency projects are to be completed by the City of Wheat Ridge as separate projects that are not dependent on the interchange improvements or on Federal funding and thus are included in the travel demand forecasting.

4.1 *Proposed Action*

This Environmental Justice Evaluation Technical Report was prepared in support of the alternative package screening process and was conducted for the portions of the Project Area potentially affected by the Proposed Action. Subsequent to the initial environmental assessments, the three alternative packages described above were screened and a Proposed Action was selected (see **Figure 4-1**). The Proposed Action consists of a series of elements, which include:

- ▶ **New I-70/32nd Avenue Interchange Hook Ramps:**
 - Construction of off-set hook ramps at the I-70/32nd Avenue interchange with the westbound hook ramps located north of 32nd Avenue at approximately 35th Avenue and the eastbound hook ramps located at Youngfield Street and 27th Avenue
 - Construction of a third bridge over 32nd Avenue for the I-70 westbound ramp traffic
 - Closure of the existing westbound I-70 off-ramp that exits to 32nd Avenue. The existing westbound I-70 on-ramp would remain open but access would be limited to eastbound 32nd Avenue traffic only
 - Reconstruction and restriping of Youngfield Street between 27th Avenue and approximately 30th Avenue to achieve a 5-lane roadway section

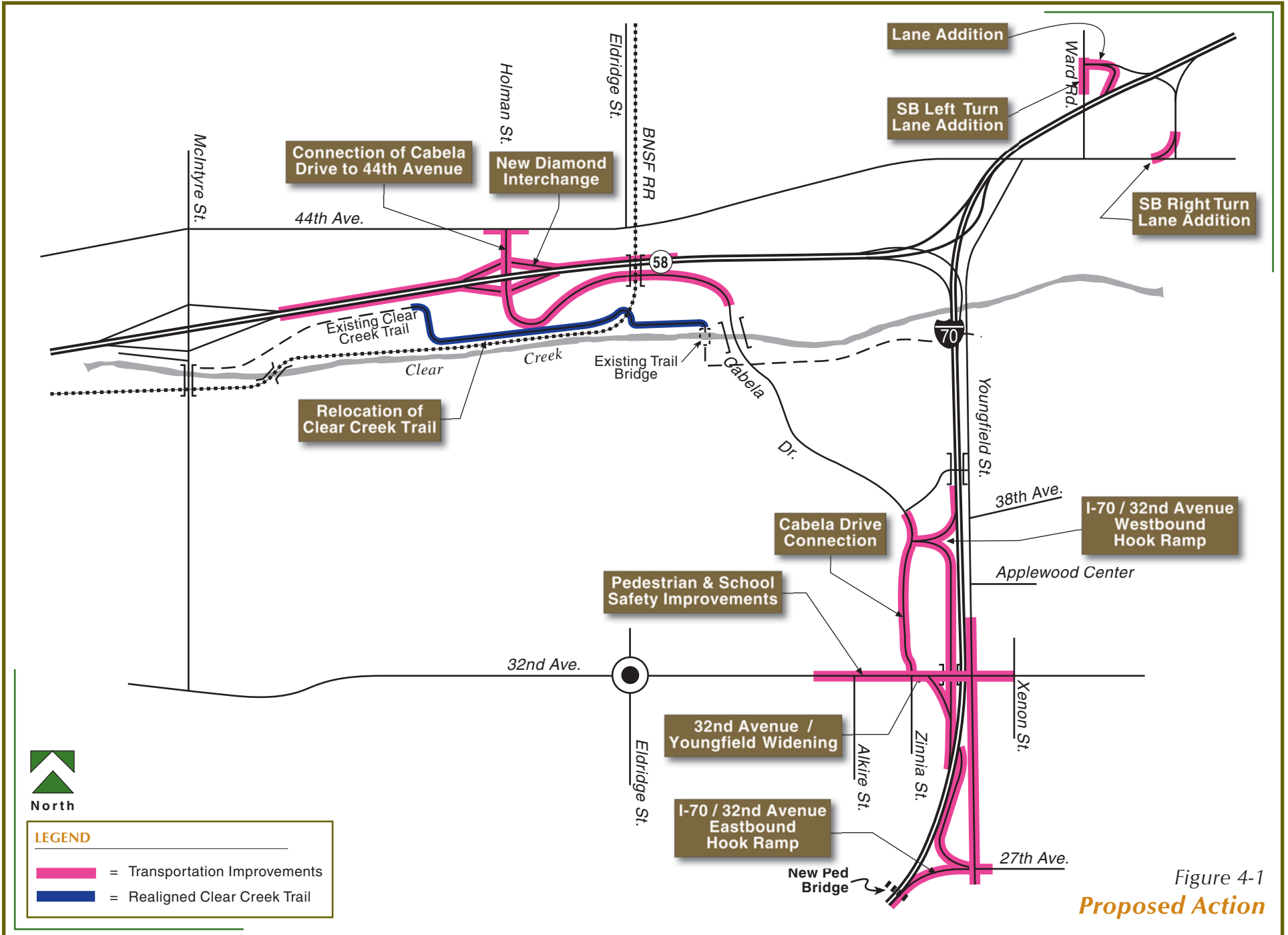


Figure 4-1
Proposed Action

▶ **32nd Avenue Improvements:**

- Widening of 32nd Avenue between approximately Alkire Street and approximately Xenon Street and the widening of Youngfield Street between approximately 35th Avenue and 30th Avenue in the vicinity of the I-70/32nd Avenue interchange
- Connection of Cabela Drive with 32nd Avenue west of I-70 (40th Avenue to 32nd Avenue)

▶ **New SH 58/Cabela Drive Interchange**

- Construction of a new diamond interchange on SH 58 west of Eldridge Street and connection of Cabela Drive to this interchange
- Connection of Cabela Drive with 44th Avenue north of the new interchange on SH 58

▶ **I-70/Ward Road Interchange:**

- of the Ward Road and westbound I-70 on-ramp intersection to add an additional southbound left turn lane onto the ramp and widen the ramp to receive this lane
- Addition of a second right-turn lane for the eastbound I-70/Ward Road off-ramp

▶ **Bicycle/Pedestrian Improvements:**

- Relocation of the Jefferson County Open Space Clear Creek trail in the vicinity of the new SH 58/Cabela Drive interchange
- Replacement of the 32nd Avenue trail detached sidewalk along the south side of 32nd Avenue from Alkire Street to Cabela Drive with an attached sidewalk
- Improvements to pedestrian and school safety along 32nd Avenue
- Construction of an Americans with Disabilities Act (ADA)-compliant pedestrian bridge at 27th Avenue to replace the existing pedestrian bridge at 26th Avenue as part of the eastbound I-70 hook ramps
- Provisions for Jefferson County Open Space Clear Creek Trail access through the development site from 32nd Avenue
- Wider sidewalks under I-70 on the south side of 32nd Avenue to better accommodate bicycles and pedestrians

4.2 Local Agency Projects

The City of Wheat Ridge submitted an application to CDOT for construction of a series of local agency projects that are common to each of the three alternative packages presented in the System Level Feasibility Study and that would be independent and stand on their own merits should no other improvements take place. The local agency projects do not preclude any of the alternatives evaluated in the EA. The local agency projects include:

- ▶ Construction of the 40th Avenue underpass of I-70
- ▶ Widening of Youngfield Street from 38th Avenue to 44th Avenue
- ▶ Construction of Cabela Drive from 40th Avenue to the proposed development just north of Clear Creek

These local agency projects are to be completed by the City of Wheat Ridge as separate projects that are not dependent on the interchange improvements or on federal funding and thus are included in the travel demand forecasting for the traffic analysis. Access approval through a Categorical Exclusion allowed access to interstate right-of-way to accommodate the 40th Avenue underpass of I-70 and the widening of Youngfield Street from 38th Avenue to 44th Avenue. Cabela Drive from 40th Avenue to the proposed development just north of Clear Creek is a local agency project and can proceed without FHWA and CDOT approval. As a local agency action not requiring CDOT right-of-way, FHWA/CDOT approval for construction of Cabela Drive from 40th Avenue to the proposed development just north of Clear Creek is not required; however, environmental permitting for these projects such as the Clean Water Act and other relevant environmental regulations will be the responsibility of the local agency or developer.

4.2.1.1 Youngfield Street Widening from 38th Avenue to 44th Avenue

The widening of Youngfield Street would occur from 38th Avenue north to 44th Avenue. From 32nd Avenue north to 38th Avenue, Youngfield Street is already a five lane facility; the widening of Youngfield Street would extend this cross-section further north to its terminus at 44th Avenue. The widening of Youngfield Street from 38th to 44th Avenue, from its current two lane configuration, would incorporate two additional through lanes in each direction and a center left turn lane at intersections.

The bridge over Clear Creek on Youngfield Street is wide enough for four lane usage, but currently only two lanes are being used. The barriers blocking the additional two lanes on the bridge would be removed and the bridge would begin to function as four 12-foot lanes.

The Youngfield Street improvements would also incorporate needed turn lanes at the 44th Avenue intersection such that double left turn lanes from westbound 44th Avenue and double right turn lanes from northbound Youngfield Street can be accommodated. These turn lane additions are also a common element to the three short-listed alternative packages.

4.2.1.2 40th Avenue Underpass of I-70

The 40th Avenue underpass of I-70 is proposed to be four lanes with a 10-foot sidewalk on the north side. Three lanes and the sidewalk would be initially constructed: one inbound to the proposed development and two outbound to Youngfield Street. Depending on the final extension of Cabela Drive to 32nd Avenue, this design could change slightly. The underpass would be designed to accommodate the potential future widening of I-70 and would accommodate all the improvements planned for the I-70 and SH 58 build out project by CDOT.

The 40th Avenue underpass would intersect with the Youngfield Service Road, creating an at-grade signed “T” intersection with the segment north of 40th Avenue. The southern segment of the Youngfield Service Road would not connect to 40th Avenue, but would continue to provide access to businesses located immediately north of 32nd Avenue on the service road. Access to the Jefferson County Open Space Clear Creek Trail would occur from the east via Youngfield Street through the 40th Avenue underpass to the northern portion of the Youngfield Service Road, and from the west via the proposed development roadway network.

4.2.1.3 *Cabela Drive from 40th Avenue to the Proposed Development Just North of Clear Creek*

The construction of Cabela Drive would include a portion of 40th Avenue extending from the 40th Avenue underpass to the west where 40th Avenue would intersect with Cabela Drive, which is a north-south roadway. 40th Avenue is proposed to be a four lane facility with adjacent sidewalks through the proposed development site. From the Cabela Drive/40th Avenue intersection to the proposed development just north of Clear Creek, Cabela Drive would consist of four through lanes with a center turn lane and adjacent sidewalks. The Clear Creek bridge crossing of Cabela Drive would include three through lanes transitioning to a three through lane facility with a center turn lane north of Clear Creek. The proposed crossing of the Clear Creek Trail, south of Clear Creek, would be grade separated.

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5.0 ENVIRONMENTAL JUSTICE EVALUATION

FHWA Order 6640.23 (1998), entitled *FHWA Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, defines minority populations and low-income populations as: “any readily identifiable group of minority or low-income persons who live in geographic proximity, and if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who would be affected by a proposed FHWA program, policy, or activity.” Minorities constitute races and ethnic groups, and include these U.S. Census Bureau-identified groups: Black/African Americans, American Indian/Alaskan Natives, Asians, Native Hawaiian/Pacific Islanders, and Hispanics. In the 2000 census, Hispanics are treated as an ethnic group distinct from racial groups, thus a person could be Hispanic and white or another race.

Low-income is defined as persons/families with incomes at or below the Department of Health and Human Services or Census Bureau poverty guidelines. The Council on Environmental Quality (CEQ) (CEQ 1997) guidance on environmental justice states that “The selection of the appropriate unit of geographical analysis may be a governing body’s jurisdiction, a neighborhood, a census tract, or other similar unit that is chosen so as not to artificially dilute or inflate the affected minority population.” CEQ further adds that “Minority populations should be identified where either (a) the minority population of the affected area exceeds 50 percent or (b) the population percentage of the affected area is meaningfully greater than the minority population percentage in the general population or other appropriate unit of geographical analysis.” The CEQ guidelines do not specifically state the percentage considered meaningfully greater in the case of low-income populations.

FHWA Order 6640.23 (1998) sets out FHWA’s policy regarding environmental justice, which includes: “When determining whether a particular program, policy, or activity will have disproportionately high and adverse effects on minority and low-income populations, FHWA managers and staff should take into account mitigation enhancement measures and potential offsetting benefits to affected minority and low-income populations. Other factors that may be taken into account include design, comparative impacts, and the relative number of similar existing systems in non-minority and non-low-income areas.”

In May 2005, CDOT issued guidelines to assist in interpreting the FHWA Orders called “CDOT’s Title VI and Environmental Justice Guidelines for NEPA Projects.” The guidelines provide generalized information describing the process to be used for environmental justice analysis, the tools to be used in the public involvement program, the data to be collected, descriptions of impacts to be evaluated and mitigation possibilities. Specific procedures for the identification of minority and low-income populations using census data are also included.

According to CDOT’s Title VI and Environmental Justice Guidelines (rev. 3), disproportionately high and adverse effects are defined as “an adverse effect or impact that would be: 1) predominantly borne by minority and/or low-income population; or 2) will be suffered by the minority and/or low-income population and is appreciably more severe or greater in magnitude than the adverse effect suffered by the population that is not low-income or minority” (CDOT 2005a).

In addition, FHWA has embraced the following objectives for environmental justice:

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

5.1 Existing Conditions

5.1.1 Minority Populations

Table 5-1 presents population data and minority population percentages for the census block groups included in the community study area. These same statistics are presented for the State of Colorado and for Jefferson County for comparison.

The census block groups surrounding the study area include a population of 22,290 individuals (in the year 2000). Data for minority populations was obtained from the 2000 Census. Since the make-up of communities can change over time, the project team made efforts to confirm that the 2000 Census information seemed to properly reflect the make-up of the community within the project area. These efforts included observing attendees at public and community meetings, questions, needs, and issues submitted via phone, mail, or email; concluded that the community make-up within the project area is still generally similar to the data found in the 2000 Census.

Census block data have been further analyzed for the total minority population (see **Figure 5-1**) and the Hispanic population (see **Figure 5-2**). The census block is the smallest geographic unit available, and adds additional detail regarding the distribution of these populations.

Based on the information presented in **Table 5-1**, **Figure 5-1** and **Figure 5-2**, the following observations can be made about the demographics of the community study area:

- ▶ The census block groups in the community study area vicinity generally have similar proportions of minorities as Jefferson County, and smaller proportions than the State of Colorado as a whole.
- ▶ Hispanics make up the largest proportion of the total minority population in the community study area. Several block groups in the eastern portion of the community study area have Hispanic populations greater than the Jefferson County average.

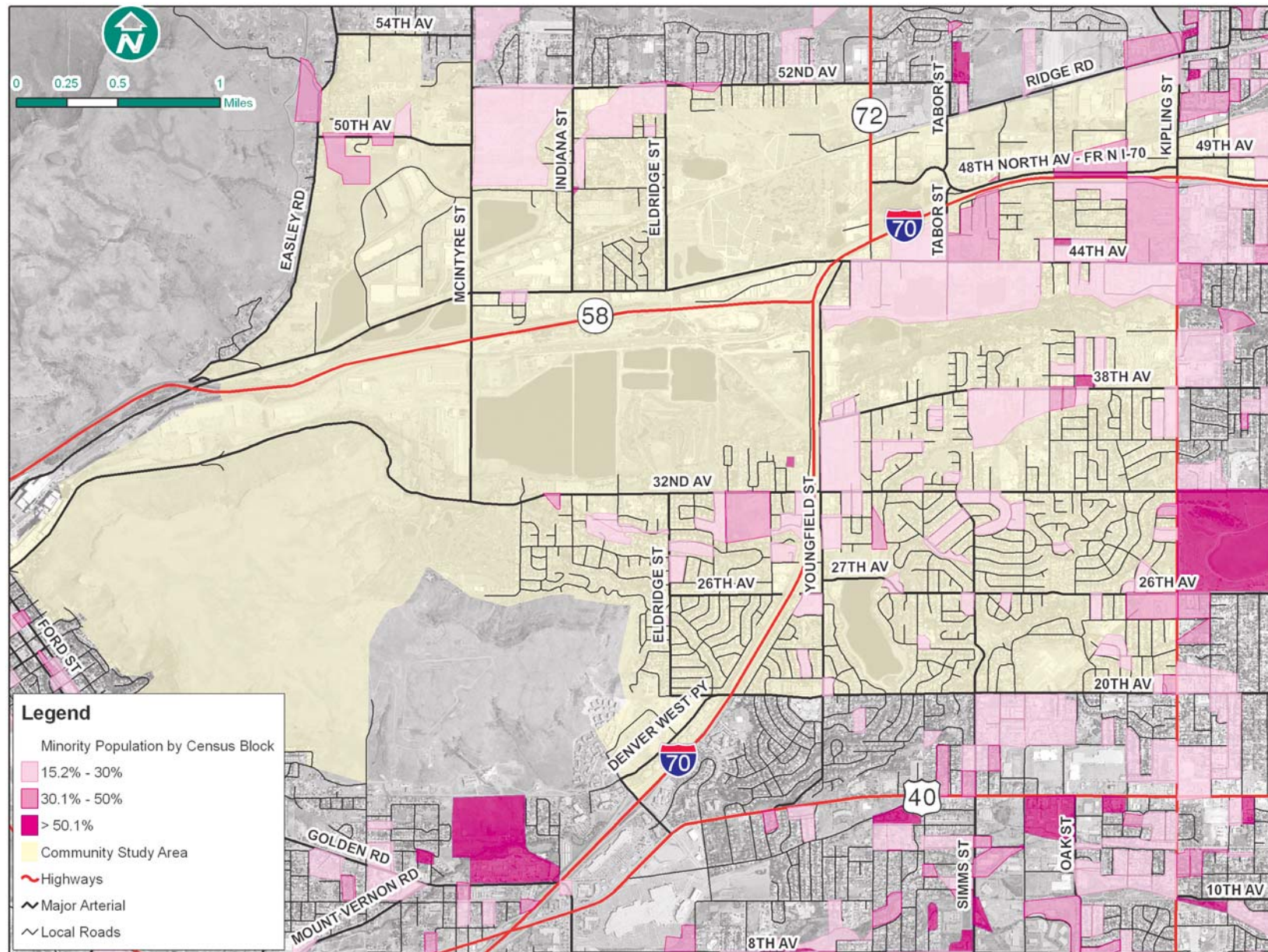
Other minority populations (Black/African American, Native American, Asian/Pacific Islander) were generally found in proportions similar to Jefferson County averages. These populations will be analyzed in more detail to the census block level in conjunction with the on-going public involvement and outreach program.

Table 5-1 Demographics of the Community Study Area - 2000

Area	Total	Minority Populations (%)				
		Black/ African American	Native American	Asia / Pacific Islander	Hispanic or Latino ¹	Total Minority ²
State of Colorado	4,301,261	3.8	1.0	2.3	17.1	25.5
Jefferson County	527,056	0.9	0.8	2.4	10.0	15.1
Tract and Census Block Groups in the Community Study Area (see Figure 3)						
Tract 98.05 Block Group 4	1602	0.0	1.1	0.8	8.1	10.1
Tract 98.06 Block Group 1	1061	0.3	0.8	0.5	2.5	4.5
Tract 98.06 Block Group 2	2556	0.2	0.5	1.4	3.5	6.2
Tract 98.07 Block Group 1	1003	0.6	0.4	0.8	8.1	12.3
Tract 98.42 Block Group 1	320	0.0	0.3	1.3	1.3	4.1
Tract 99 Block Group 3	859	0.5	0.6	4.5	4.9	12.5
Tract 104.02 Block Group 4	1276	1.1	0.5	0.3	11.1	13.6
Tract 104.03 Block Group 3	1066	1.0	1.5	2.1	14.4	20.7
Tract 104.03 Block Group 4	2142	2.0	0.9	1.8	15.8	22.4
Tract 105.03 Block Group 1	1575	0.5	1.0	1.3	10.7	15.0
Tract 105.03 Block Group 2	2236	0.6	0.7	1.0	10.2	13.6
Tract 105.03 Block Group 3	1073	0.0	0.2	1.7	5.1	8.1
Tract 105.04 Block Group 1	677	0.0	0.4	2.1	3.4	7.1
Tract 105.04 Block Group 2	628	0.0	0.2	0.2	2.7	4.3
Tract 105.04 Block Group 3	517	0.4	0.2	1.0	3.5	7.2
Tract 105.04 Block Group 4	1146	0.4	0.3	2.3	3.8	7.9
Tract 108.01 Block Group 1	2553	0.5	0.6	1.2	6.7	9.9
Total of Block Groups	22,290	0.6	0.7	1.4	7.8	11.5
Source: U.S. Census Bureau Year 2000 data						
¹ Hispanic/Latino can be of any race						
² Total minority includes all individuals except non-Hispanic whites						
Percentages shown in BOLD exceeded percentage for the county as a whole (also shown in BOLD for comparison)						

Figure 5-3 shows the percentage of households that have “limited English proficiency” (no one in the home over 14 years of age is proficient in English) with Spanish as the primary language. The area south/east of I-70 and bordering 44th Avenue has between 2 and 5 percent of the homes with linguistic isolation. Additional detailed comparisons of census block minority data with county averages are presented in the following figures:

- ▶ **Figure 5-4** African American Population by Census Block
- ▶ **Figure 5-5** Native American Population by Census Block
- ▶ **Figure 5-6** Asian American Population by Census Block



Legend

- Minority Population by Census Block
- 15.2% - 30%
- 30.1% - 50%
- > 50.1%
- Community Study Area
- Highways
- Major Arterial
- Local Roads

Figure 5-1

Total Minority Population by Census Block

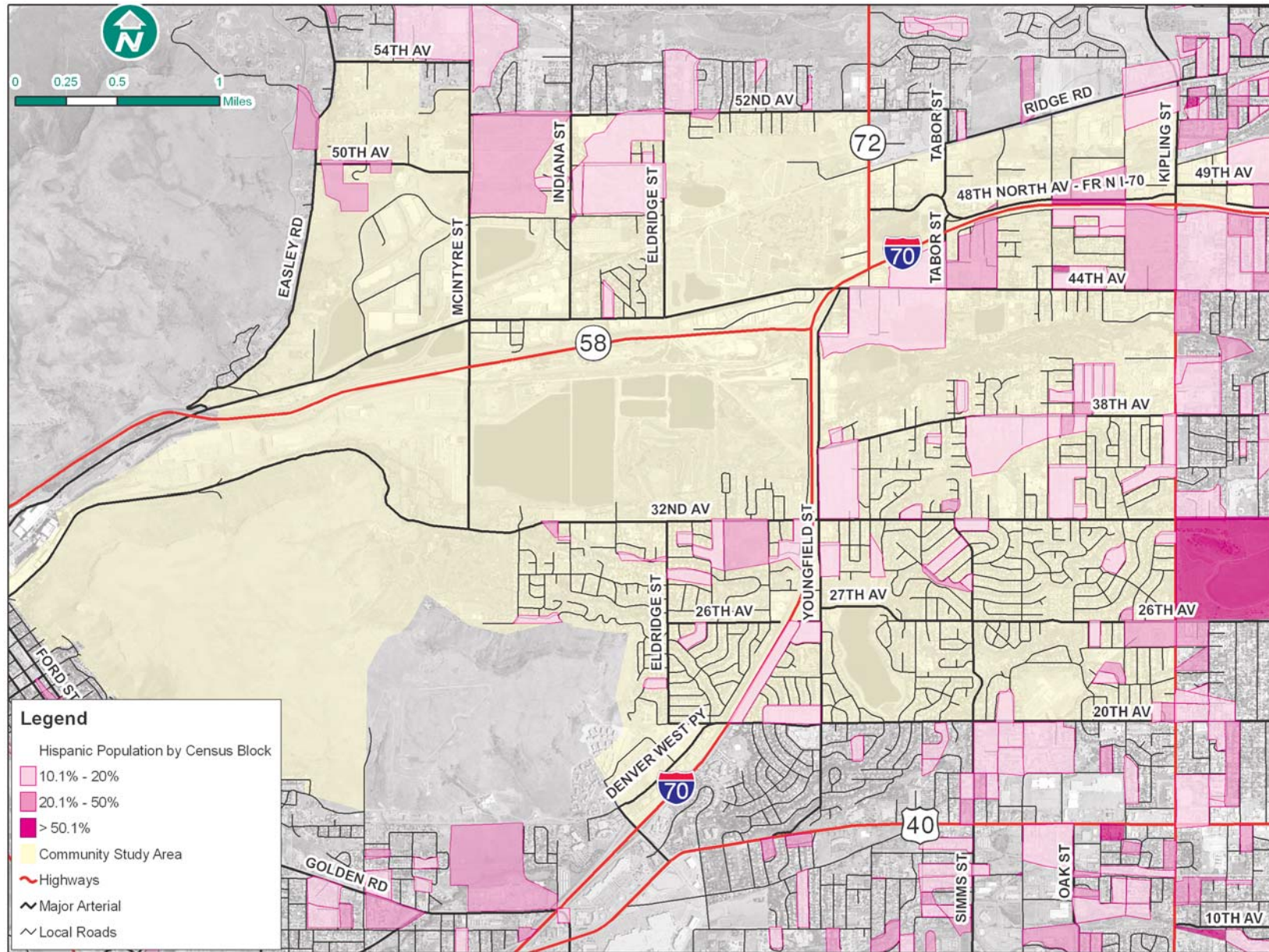
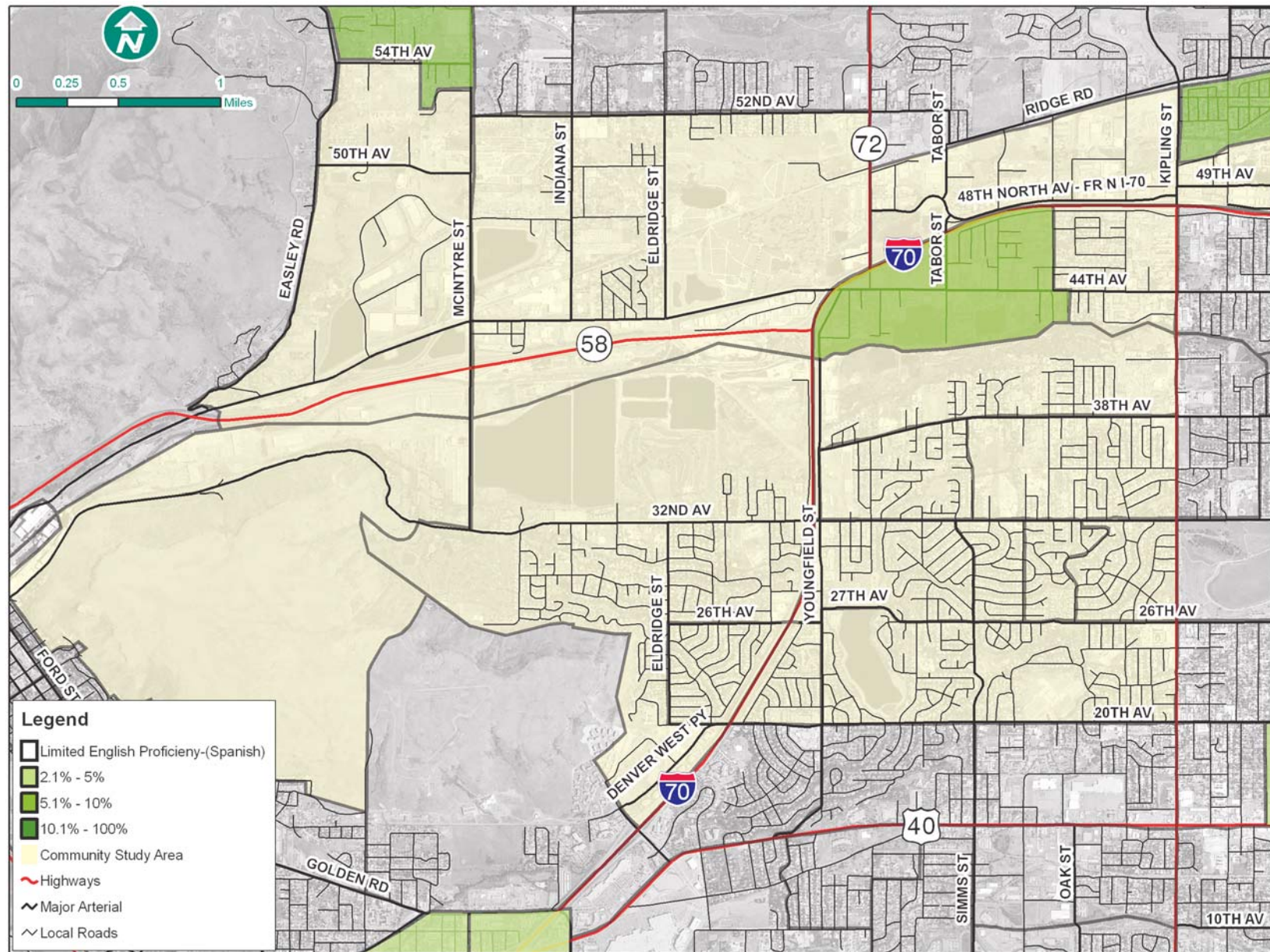


Figure 5-2

Hispanic Population by Census Block



Legend

- Limited English Proficiency-(Spanish)
- 2.1% - 5%
- 5.1% - 10%
- 10.1% - 100%
- Community Study Area
- ~ Highways
- ~ Major Arterial
- ~ Local Roads



North SOURCE: U.S. Census 2000

Figure 5-3

Limited English Proficiency

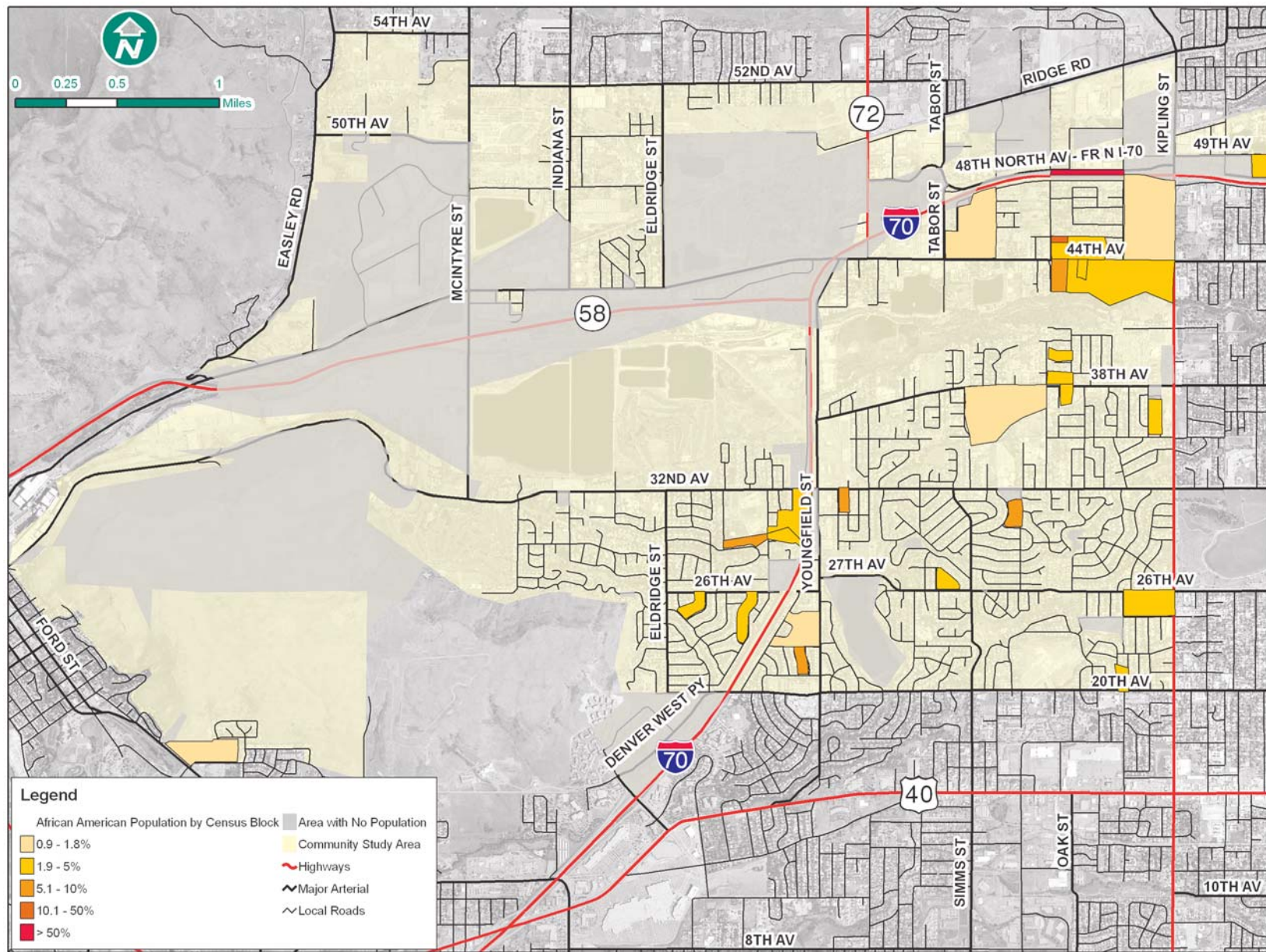
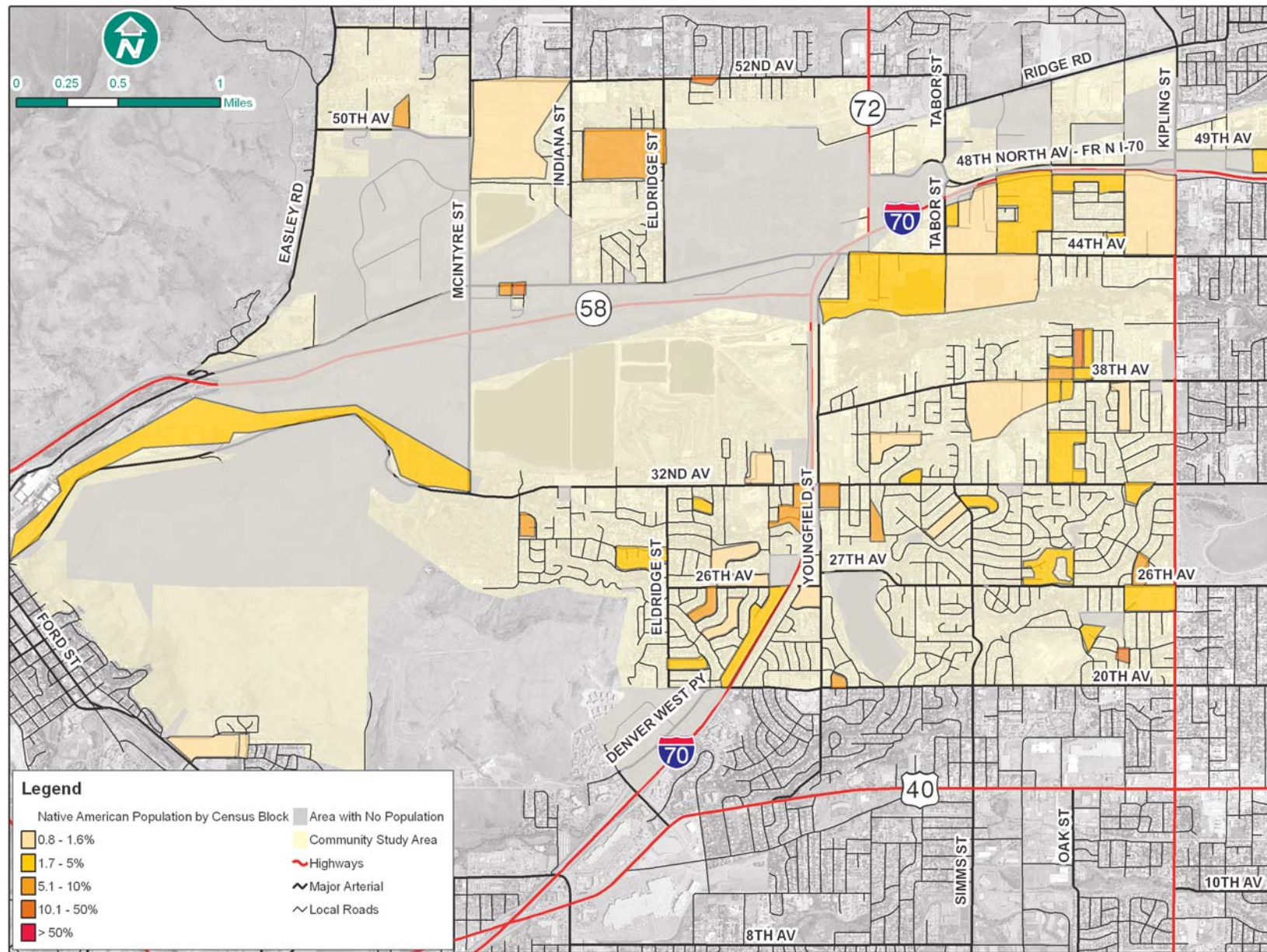


Figure 5-4

African American Population by Census Block



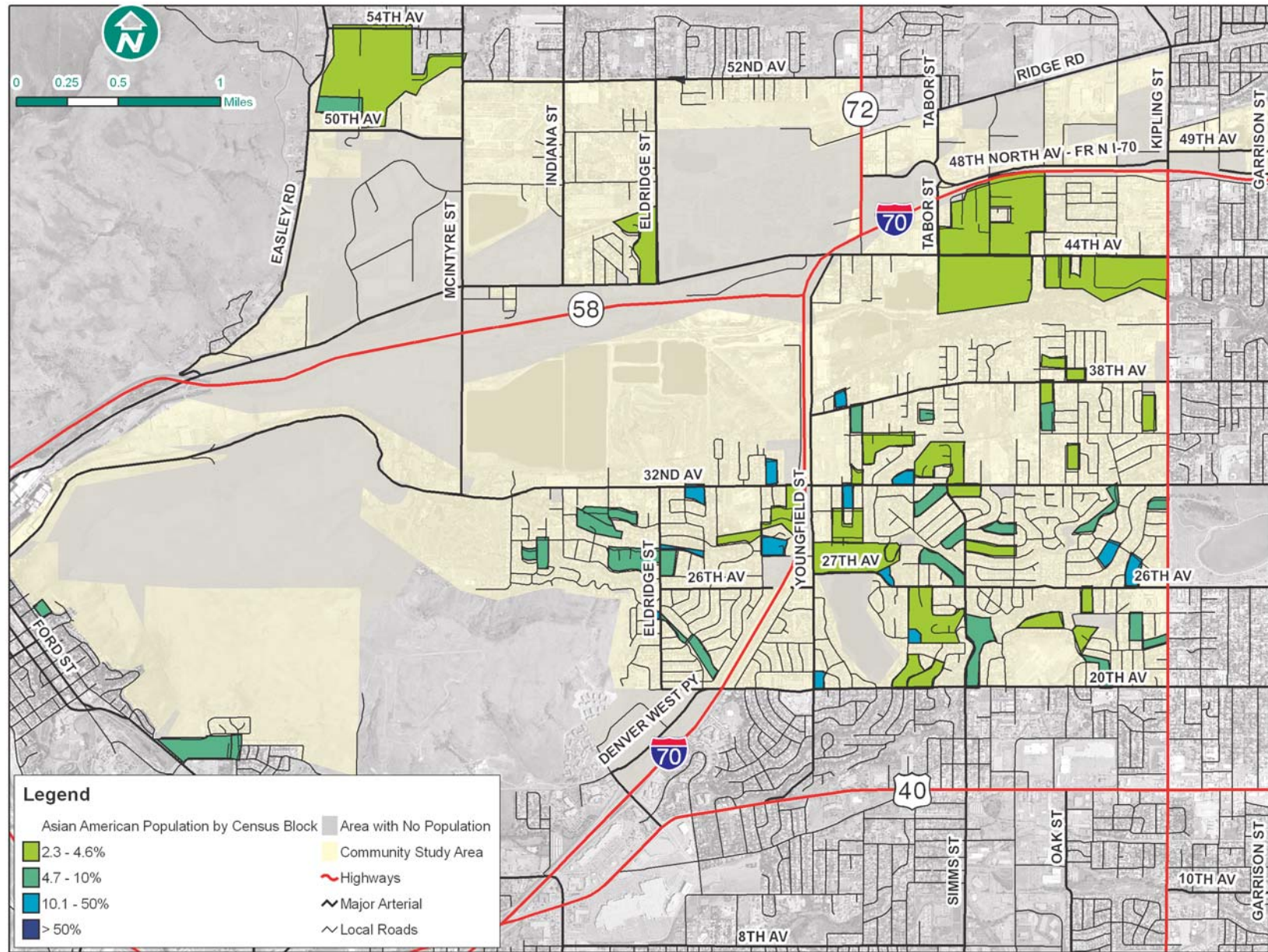
North SOURCE: U.S. Census 2000



North SOURCE: U.S. Census 2000

Figure 5-5

Native American Population by Census Block



North SOURCE: U.S. Census 2000

Figure 5-6

Asian American Population by Census Block

5.1.2 Low-Income Populations

For purposes of privacy, the census block group is the most detailed level of data that displays income information. The CDOT Environmental Justice Guidebook describes the recommended approach for identifying low-income populations on CDOT projects, which is to utilize the income thresholds set annually by Department of Housing and Urban Development (HUD) for distribution of Community Development Block Grant funds for Section 8 housing assistance. Section 8 housing is a program that assists families and seniors with renting apartments, townhouses, condominiums, or houses owned and managed by private landlords. The Guidebook suggests using HUD data since it “incorporates adjustments based on local income and is more appropriate for the Colorado environment where the cost of living for counties and other sub-areas around the state vary widely” (CDOT 2004).

To determine low-income populations, the income threshold set annually by the U.S. HUD for the distribution of funds for Section 8 housing assistance was used. The average household size in Jefferson County is approximately 2.5 persons. Income limits that are 30 percent of the average mean income are used as a threshold for determining low-income, consistent with the methodology identified in the CDOT Environmental Justice Guidebook. The income limit for 30 percent of area median income is \$18,318 for the average household in Jefferson County. Since census income statistics are divided into increments of \$5,000, any household (regardless of the number of people) in Jefferson County with an income less than \$20,000 is considered low-income. In accordance with the methodology in the CDOT Guidebook using this methodology, approximately 22 percent of households in Jefferson County are considered low-income (30 percent of the area median income).

Figure 5-7 highlights census block groups that have a higher percentage of low-income households than the Jefferson County percentage. According to Census block data, the portion of the study area with the highest percentage of low-income populations is north of I-70 and east of Highway 72.

Table 5-2 presents the low-income percentages by block group. The location of the block groups is shown on **Figure 5-7**. As shown on **Figure 5-7** and **Table 5-2**, several other block groups scattered through the southern portion of the community study area also exceed the Jefferson County low-income percentage.

Specific efforts were made to avoid low-income populations. For example, an apartment complex, located within one of the areas identified as low-income (**Figure 5-7**), is situated adjacent to the east side of I-70 on West 26th Avenue. The current pedestrian bridge that would be reconstructed under the Proposed Action currently is situated adjacent to this apartment complex. Since the new pedestrian bridge will be ADA compliant, it will require extensive ramps. One of the original design options included placing the new ADA compliant pedestrian bridge on West 26th Avenue. However, placing the bridge at this location would have caused negative impacts to the apartment complex. The design for the new pedestrian bridge was moved to 27th Avenue to specifically avoid this community. The proposed location for the bridge will actually be beneficial for this community as further discussed in **Section 5.2.2 Proposed Action**.

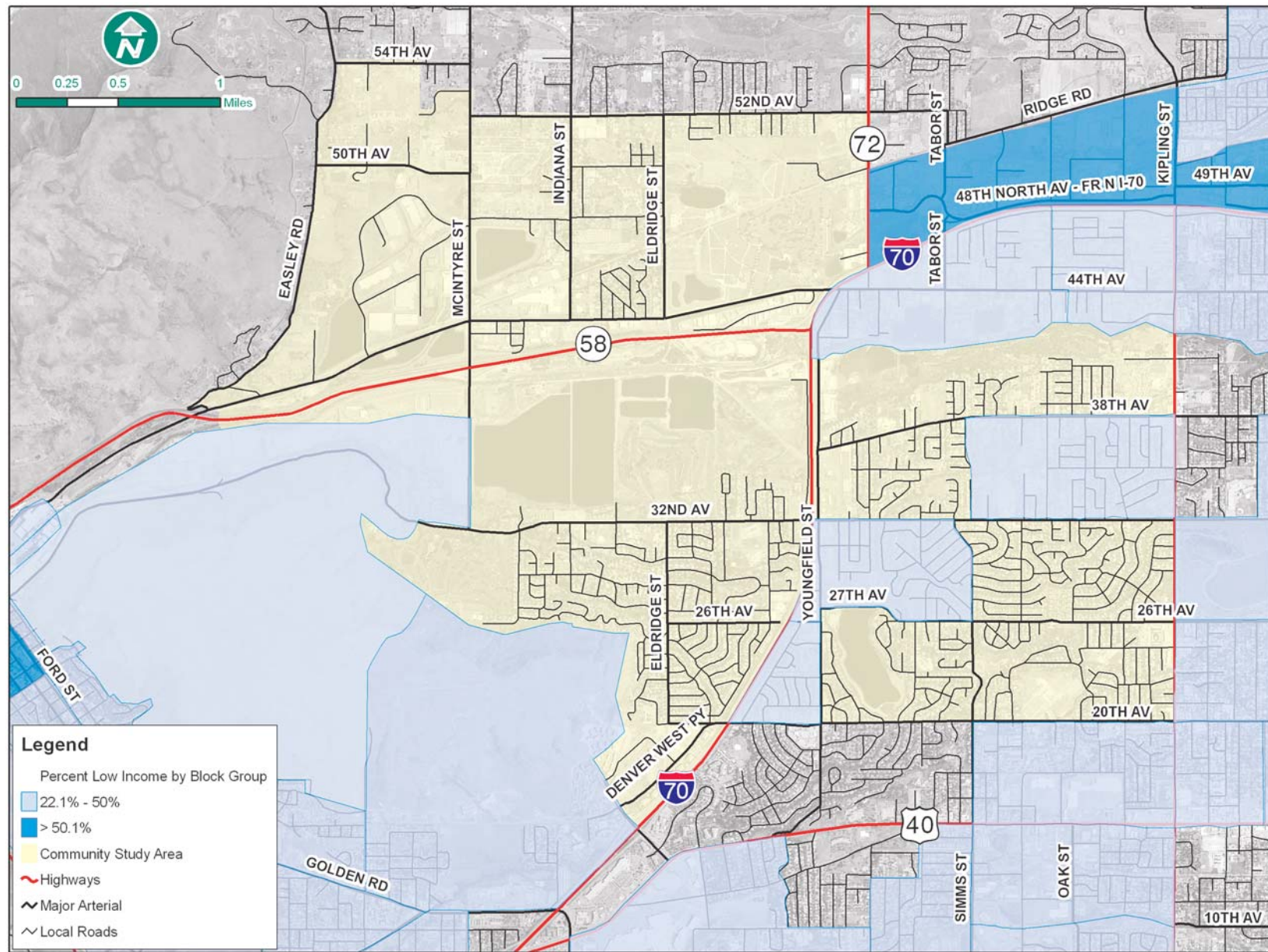


Figure 5-7
Low-Income Population by Block Group

Table 5-2 Low-Income Households

Area	Low-Income Households (%)
Jefferson County	22%
Tract and Census Block Groups in the Community Study Area (see Figure 1-3)	
Tract 98.05, Block Group 4	10.1%
Tract 98.06, Block Group 1	17.7%
Tract 98.06, Block Group 2	7.5%
Tract 98.07, Block Group 1	38.2%
Tract 98.42, Block Group 1	19.8%
Tract 99.00, Block Group 3	28.5%
Tract 104.02, Block Group 4	72.9%
Tract 104.03, Block Group 3	33.1%
Tract 104.03, Block Group 4	47.4%
Tract 105.03, Block Group 1	21.9%
Tract 105.03, Block Group 2	35.2%
Tract 105.03, Block Group 3	16.5%
Tract 105.04, Block Group 1	21.8%
Tract 105.04, Block Group 2	9.1%
Tract 105.04, Block Group 3	10.1%
Tract 105.04, Block Group 4	24.2%
Tract 108.01, Block Group 1	18.6%
Source: U.S. Census Bureau Year 2000 data, HUD Section 8	
Percentages shown in BOLD exceeded percentage for the county as a whole (also shown in BOLD for comparison)	

5.1.3 Public and Agency Involvement Relevant to Environmental Justice

An extensive public and agency involvement program has been implemented and is on-going. Elements of the public involvement program with a specific focus on minority and low-income populations and the local communities have included two project meetings held at convenient locations in the study area with Spanish translation provided. The most recent Open House was on November 30, 2005 and focused on issues regarding the EA. The newsletter notifying the study area of the open house was also translated into Spanish.

5.1.4 Community Cohesion and Connections

SH 58 and I-70 have few crossing roadways, limiting movement across these transportation corridors. Residential land use along 32nd Avenue and the series of former aggregate pits (many converted to water storage) west of I-70 and south of SH 58 limit connections between 32nd Avenue and the existing SH 58 frontage road within the study area.

Pedestrian and bicycle mobility within the community study area is served by the Jefferson County Open Space Clear Creek Trail, which allows accessibility to areas adjacent to SH 58 and I-70. Otherwise, pedestrians, bicyclists, and vehicle traffic must cross I-70 along 32nd Avenue through the interchange and the Youngfield Street/32nd Avenue intersection or cross SH 58 at McIntyre Street.

The 26th Avenue pedestrian bridge over I-70 serves as a connection between communities located east and west of I-70 at 26th Avenue. Sidewalks throughout the community study area along main road corridors also serve to connect communities and allow access to shopping areas and community services and facilities. Crosswalks are located at many intersections and in areas where schools are located. The pedestrian bridge currently in place is not ADA-compliant, does not provide ramp access for bicyclists, and has low visual quality. The bridge structure is concrete with steep steps and no ramps.

A survey regarding the pedestrian bridge was taken at the Open House on November 30, 2005 (MGA 2005). Thirty-five people responded to the survey, with 24 of those people indicating that they, or members of their family, use the bridge. Frequency of utilization of the bridge was included in the survey. Five people indicated that they used the bridge daily, three used it about once a week, three used it several times a week, four used it once a month, and nine indicated using the bridge several times a year. Uses for the bridge included:

- ▶ Bicycle across I-70
- ▶ Use during leisure walks
- ▶ Use to access shops on the east side of I-70
- ▶ Use to access the sports complex or to go to church
- ▶ Use back and forth to school
- ▶ Accessing friends' houses across the highway

Several survey respondents indicated that they would like a pedestrian structure constructed that accommodated bicycles (bicycles currently have to be carried) and was ADA-compliant with ramp access.

5.2 Environmental Consequences

Community and environmental justice considerations have been fully integrated into the alternative development process for this project from the beginning and, thus, have been considered during scoping, alternatives development, public and agency involvement and environmental analysis. Throughout this process, efforts have been made to avoid and minimize adverse impacts to minority and low-income populations, and to incorporate features into the project to address the concerns of the communities.

5.2.1 No-Action Alternative

Under the No-Action Alternative no additional right-of-way would need to be acquired. However, the No-Action Alternative would not promote the most efficient use of the existing transportation corridors. The No-Action Alternative would not be fully supportive of future land

use and transportation needs identified by the cities of Wheat Ridge and Lakewood. Under the No-Action Alternative, low-income and minority populations present within the community study area would continue to experience the traffic congestion problems currently experienced by all populations; however, the impacts would increase proportional to higher levels of congestion as traffic and congestion increases.

5.2.2 Proposed Action

The Proposed Action would result in numerous benefits to the local community, Cities of Wheat Ridge and Lakewood, and Jefferson County. Traffic congestion at several points within the study area would be reduced resulting in decreased travel time for minority and low-income populations, as well as others traveling in the study area. Benefits from the project are expected to be equitably shared across demographic groups and communities.

The Proposed Action would replace facilities affected by construction in accordance with City of Wheat Ridge and/or Jefferson County criteria, which meets ADA requirements. These improvements would benefit all pedestrians and bicyclists, including low-income individuals who walk or bicycle to bus stops. Improvements are described below:

- ▶ Replacement of the pedestrian bridge at 26th Avenue with a bridge that accommodates bicyclists and strollers would improve pedestrian access across I-70 by upgrading the pedestrian bridge at 26th Avenue to Americans with Disabilities Act (ADA) standards
- ▶ Construction of new sidewalk along the north side of 32nd Avenue from Braun Court to Xenon street to improve pedestrian access to The Manning School and Maple Grove Elementary and to replace sidewalk affected by reconstruction of 32nd Avenue
- ▶ Construction of new sidewalk along Youngfield Street at 32nd Avenue and 27th Avenue to replace existing sidewalk affected by reconstruction of the intersections
- ▶ Construction of new multi-use sidewalk from 44th Avenue to the Clear Creek Trail at the new SH 58/Cabela Drive interchange and along Cabela Drive to the proposed development
- ▶ Cabela Drive from 32nd Avenue north to approximately Clear Creek will have sidewalk on both sides of the street
- ▶ School zone safety improvements are planned along 32nd Avenue adjacent to the Manning and Maple Grove Elementary schools. Improvements include contiguous sidewalks/bikepaths, upgraded signing and traffic signal pedestrian actuation.

Several criteria were utilized to determine if the Proposed Action would have a disproportionate or adverse effect on low-income or minority populations including, but not limited to: relocations of residences and business' low-income or minority owned, displacement of businesses that provide jobs for minority and/or low-income populations, and displacement of places of worship or community centers.

Construction of the Proposed Action would require the relocation of approximately two residential dwellings and seven businesses. Residents and business owners would receive relocation benefits in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act. Information obtained through site visits, public meetings, interviews with impacted business owners, and from the 2000 Census and assessor's website did not

suggest that minority or low-income populations would be disproportionately impacted as a result of the relocations. One of the residential relocations has contacted the project team requesting that accommodations be made for an elderly family member that lives in the residential dwelling.

In order to assist the elderly person, and others that may be identified, CDOT staff will prepare a relocation analysis prior to relocation. The relocation analysis will enable the relocation activities to be planned so that the problems associated with the displacement of individuals, families, and businesses are recognized, and solutions are developed to minimize the adverse impacts of displacement. The scope of planning will be based on the complexity and nature of the anticipated displacing activity, including the evaluation of program resources available to carry out timely and orderly relocations.

The businesses that would be displaced as a result of the Proposed Action are retail oriented (chain-owned coffee shop, dry cleaners etc.) and are estimated to employ less than 10 individuals each. The businesses did not appear to be solely utilized by or provide unique services to minority or low-income populations. For displaced businesses that choose not to relocate locally, individuals that are employed by the displaced businesses should have accessibility to other retail work opportunities. For example, the proposed retail store development near the I-70/SH 58 interchange is estimated to employ 412 full time equivalent workers. The location of the proposed development will have accessible public transit options and will be connected by improved pedestrian and bicycle facilities under the Proposed Action.

The distribution of impacts from residential relocations will not fall disproportionately on low-income or minority populations. The project will not result in the displacement of any places of worship or community centers. Based on public comments received and other public participation process' (website, community meetings) there were no identified low-income or minority populations that would be adversely impacted by the Proposed Action. No minority or low-income populations have been identified that would be adversely impacted by this project as determined above. Therefore, this project has met the provisions of Executive Order 12898.

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6.0 PUBLIC OUTREACH

An extensive public and agency involvement program has been conducted to provide updates on process, design, and analysis, and to receive input on the development and screening of alternatives. The program included community presentations to local neighborhood groups, meetings with local, state, and federal agencies, and a series of open houses with the general public.

There will be additional opportunity for public and agency participation following the release of this EA. This will include a public hearing and the opportunity to review the EA and provide comments.

Key elements of the public and agency involvement program included:

- ▶ Four open houses held with the general public at key points in the process to provide information on the alternatives development and screening process. Notification of the meetings was provided through a variety of methods, including invitation letters, a press release to local media outlets in Denver and Jefferson County, direct phone calls, project flyers, newsletters in Spanish and English, and paid advertisements in local media outlets. The August 17, 2005 Open House served as the public scoping meeting for the EA. No specific information was received from the open houses with regard to low-income or minority populations. The interpreter at the open houses did not need to field any questions, issues, or needs from any attendees.
- ▶ Numerous community presentations and meetings with local neighborhood associations and business groups were held to address concerns and field questions on the project status. Neighborhood groups did not request the presence of an interpreter. No questions or concerns specific to low-income or minority populations were received at the community presentations.
- ▶ A telephone line at (303) 376-8394 was established in March 2005 to provide individuals and groups with the opportunity to leave a message for the project team. All messages were recorded and responded to with a goal of two working days. No messages specific to low-income or minority populations questions, issues, or needs, have been received through the telephone line.
- ▶ A website was established on March 29, 2005 to provide public access to information on the project, including questions and answers, alternatives development, screening, refinement, and changes made based on public comment. The website address is www.cabwheatridge.com. No public comments specific to low-income or minority populations questions, issues, or needs, have been received through the website.
- ▶ Regular coordination/progress meetings were held approximately every four weeks with the Project Committee to provide a forum for discussion and guidance in the decision-making process. The Project Committee included representatives from the FHWA, CDOT Region 6, CDOT Environmental Programs Branch, Colorado Governor's Office, Jefferson County, City of Arvada, City of Lakewood, City of Wheat Ridge, Coors Brewing Company, and Cabela's.

- ▶ A series of agency scoping meetings were held with local, state, and federal resource agencies, local municipalities, and CDOT Environmental Programs Branch. A project scoping meeting was held on July 26, 2005, and a supplemental project scoping meeting was held on August 11, 2005. A separate scoping meeting was held on August 29, 2005 with the CDOT Environmental Programs Branch, and a scoping and data gathering meeting with Jefferson County staff was held on September 15, 2005.
- ▶ Special outreach activities to low-income and minority populations were conducted. The special outreach activities included access to Spanish translation at public meetings and dissemination of project information through a bilingual (Spanish/English) mass mailing. No questions, needs, issues, or other input referencing low-income or minority populations were received as a result of the outreach activities.

7.0 REFERENCES

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