

## Final Report

# 72<sup>nd</sup> and Colorado Boulevard Urban Renewal Area Existing Conditions Survey

*The Economics of Land Use*



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Commerce City Urban Renewal Authority and Adams County

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# 1. Introduction

Economic & Planning Systems (EPS) was retained by the Commerce City Urban Renewal Authority (CCURA) to conduct an Existing Conditions Survey (Survey) of a proposed Urban Renewal Plan Area (Study Area) surrounding the existing 72<sup>nd</sup> and Colorado station area on the RTD N Corridor commuter rail line.

## **Purpose**

The purpose of the Existing Conditions Survey is to determine whether the properties contained within the Study Area meet the definition of a “blighted area” under the Colorado Urban Renewal Law. If all or a portion of the Study Area meets the state definition of a blighted area, the CCURA intends to establish a URA Plan Area for such urban renewal activities, as the CCURA and City Council deem appropriate.

## **Colorado Urban Renewal Law**

The requirements for the establishment of a URA plan are outlined in the Colorado Urban Renewal Law, Colorado Revised Statutes (C.R.S.) § 31-25-101 et seq. In order to establish an area for urban renewal, there is a list of physical, environmental, and social factors that must be evaluated to meet the definition of a blighted area as shown below.

## **Urban Renewal Law**

### ***Blight Factors (C.R.S. § 31-25-103)***

*"Blighted area' means an area that, in its present condition and use and, by reason of the presence of at least four of the following factors, substantially impairs or arrests the sound growth of the municipality, retards the provision of housing accommodations, or constitutes an economic or social liability, and is a menace to the public health, safety, morals, or welfare:*

- (a) Slum, deteriorated, or deteriorating structures;*
- (b) Predominance of defective or inadequate street layout;*
- (c) Faulty lot layout in relation to size, adequacy, accessibility, or usefulness;*
- (d) Unsanitary or unsafe conditions;*
- (e) Deterioration of site or other improvements;*
- (f) Unusual topography or inadequate public improvements or utilities;*
- (g) Defective or unusual conditions of title rendering the title nonmarketable;*
- (h) The existence of conditions that endanger life or property by fire or other causes;*
- (I) Buildings that are unsafe or unhealthy for persons to live or work in because of building code violations, dilapidation, deterioration, defective design, physical construction, or faulty or inadequate facilities;*
- (j) Environmental contamination of buildings or property;*
- (k.5) The existence of health, safety, or welfare factors requiring high levels of municipal services or substantial physical underutilization or vacancy of sites, buildings, or other improvements; or*
- (l) If there is no objection by the property owner or owners and the tenant or tenants of such owner or owners, if any, to the inclusion of such property in an urban renewal area, "blighted area" also means an area that, in its present condition and use and, by reason of the presence of any one of the factors specified in paragraphs (a) to (k.5) of this subsection (2), substantially impairs or arrests the sound growth of the municipality, retards the provision of housing accommodations, or constitutes an economic or social liability, and is a menace to the public health, safety, morals, or welfare. For purposes of this paragraph (l), the fact that an owner of an interest in such property does not object to the inclusion of such property in the urban renewal area does not mean that the owner has waived any rights of such owner in connection with laws governing condemnation."*

### ***Use of Eminent Domain***

In order for an Urban Renewal Authority to use the powers of eminent domain to acquire properties, 5 of the 11 blight factors must be present (C.R.S. § 31-25-105.5(a)).

*"Blighted area' shall have the same meaning as set forth in section 31-25-103 (2); except that, for the purposes of this section only, "blighted area" means an area that, in its present condition and use and, by reason of the presence of at least five of the factors specified in section 31-25-103 (2)(a) to (2)(l), substantially impairs or arrests the sound growth of the municipality, retards the provision of housing accommodations, or constitutes an economic or social liability, and is a menace to the public health, safety, morals, or welfare."*

### **Urban Renewal Case Law**

In addition to the State statute, several principles have been developed by Colorado courts to guide the determination of whether an area constitutes a blighted area under the Urban Renewal Law. The following parameters have been established through case law for determining blight and the role of judiciary review.

#### ***Tracy v. City of Boulder (Colo. Ct. App. 1981)***

- Upheld the definition of blight presented in the Urban Renewal Law as a broad condition encompassing not only those areas containing properties so dilapidated as to justify condemnation as nuisances, but also envisioning the prevention of deterioration. Therefore, the existence of widespread nuisance violations and building condemnation is not required to designate an area blighted.
- Additionally, the determination of blight is the responsibility of the legislative body and a court's role in review is to verify if the conclusion is based upon factual evidence determined by the City Council at the time of a public hearing to be consistent with the statutory definition.

#### ***Interstate Trust Building Co. v. Denver Urban Renewal Authority (Colo. 1970)***

- Determined that blight assessment is not on a building-to-building basis but is based on conditions observed throughout the plan area as a whole. The presence of one well maintained building does not defeat a determination that an area constitutes a blighted area.

## Methodology

The Existing Conditions Survey was completed through on-site documentation and a photographic inventory of conditions for each of the blight factors found to be present. An inventory of parcels within the Study Area was compiled using parcel data from the Adams County Assessor, documenting parcel ownership, size, use, vacancy, and assessed value. The assessment of blight conditions is based on a field survey conducted by EPS in March 2023. The survey team toured the entire Study Area, taking notes and photographs to document existing conditions corresponding to the blight factor evaluation criteria detailed in the following section.

The 11 factors of blight in the state statute were broken down into “conditions” - existing situations or circumstances identified in the Study Area that may qualify as blight under each of the 11 factors. The conditions documented in this report are submitted as evidence to support a “finding of blight” according to the Colorado Urban Renewal Law. Under the law, the final determination of blight within the Study Area is within the sole discretion of the URA Board.

## 2. Study Area Analysis

### Study Area

The proposed Commerce City Urban Renewal Plan Area is comprised of 1,210 parcels on approximately 1,656 acres of land, as shown in **Figure 1** on the next page. The Study Area includes land in the City of Commerce City and in unincorporated Adams County and is generally bounded by East 64<sup>th</sup> Avenue on the south, York Street extending to Welby Road on the west, and East 88<sup>th</sup> Avenue on the northwest corner. The eastern portion of the Study Area is bounded by the Union Pacific Railroad (UPRR) on the east edge up to East 80<sup>th</sup> Avenue on the north.

A summary of the parcels by land use category is shown in **Table 1**, and a complete inventory of all parcels is contained in Appendix A. The largest amount of land is commercial, with 224 parcels totaling 697 acres. With respect to building area, the largest amount of space is also commercial with nearly 1.4 million square feet of development as shown.

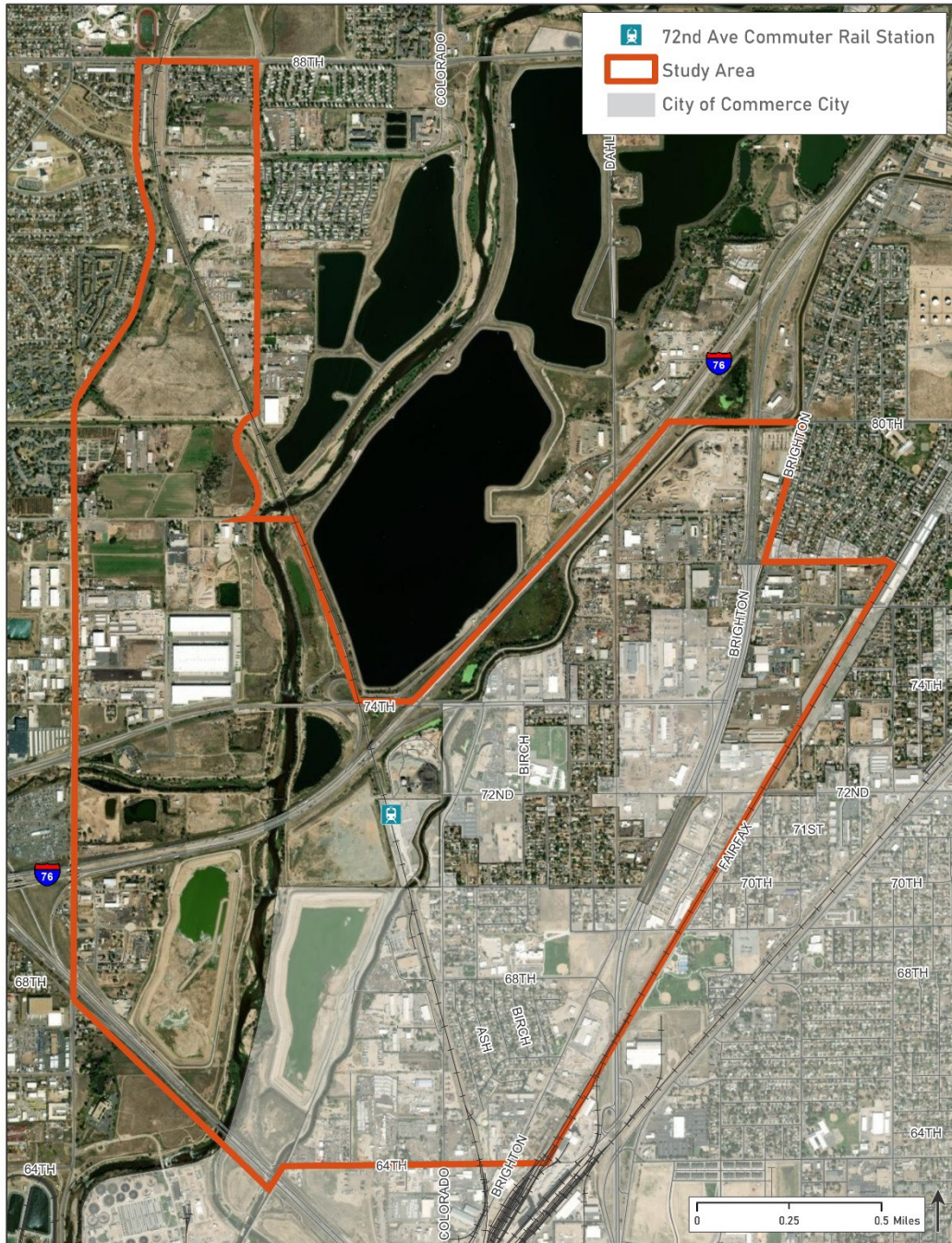
**Table 1. Summary of Parcels by Land Use Contained in the URA Study Area**

Land Use	# of Parcels	Land Acres	Bldg Sq. Ft.	Assessed Valuation		
				Land	Improv.	Total
Agricultural	10	49	18,714	\$84,603	\$968,230	\$1,052,833
Commercial	224	697	1,389,201	\$89,188,737	\$149,636,876	\$238,825,613
Exempt	74	458	323,450	\$18,015,276	\$72,350,827	\$90,366,103
Industrial	36	137	335,921	\$12,428,423	\$28,222,517	\$40,650,940
Residential	830	313	863,195	\$80,284,990	\$184,243,804	\$264,528,794
State Assessed	36	2	0	\$32,890	\$0	\$32,890
<b>Total</b>	<b>1,210</b>	<b>1,656</b>	<b>2,930,481</b>	<b>\$200,034,919</b>	<b>\$435,422,254</b>	<b>\$635,457,173</b>

Source: Esri, Adams County Assessor, Economic & Planning Systems



**Figure 1. Commerce City Proposed URA Boundary**



## **Blight Factor Criteria**

This section details the conditions used to evaluate blight during the field survey. The following conditions correspond with 8 of the 11 blight factors in the Urban Renewal Law. Additional information on a number of these factors for which data was available was also collected. The remaining blight factors cannot be visually inspected and are dependent on other data sources. Given the prevalence of physically observable conditions of blight, these remaining blight factors were not investigated.

### **Street Layout**

The following conditions evaluate the Urban Renewal Law blight factor “(b) *predominance of defective or inadequate street layout,*” through assessment of the safety, quality, and efficiency of street layouts, site access, and internal circulation.

Typical examples of conditions that portray this criterion include:

- Inadequate street or alley width / cross-section / geometry
- Poor provision of streets or unsafe conditions for vehicular traffic
- Poor provision of sidewalks/walkways or unsafe conditions for pedestrians
- Insufficient roadway capacity
- Inadequate emergency vehicle access
- Poor vehicular or pedestrian access to buildings or sites
- Excessive curb cuts / driveways along commercial blocks
- Poor internal vehicular or pedestrian circulation

### **Lot Layout**

The following conditions evaluate the Urban Renewal Law blight factor “(c) *Faulty lot layout in relation to size, adequacy, accessibility, or usefulness.*”

Typical examples of conditions that portray this criterion include:

- Faulty or inadequate lot shape or layout
- Poor vehicular access
- Lot sizes deemed to be unusable

### **Unsafe/Unsanitary Conditions**

The following conditions establish evidence of Urban Renewal Law blight factor “(d) *unsanitary or unsafe conditions,*” by evaluating visual conditions that indicate the occurrence of activities that inhibit the safety and health of the area including, but not limited to, excessive litter, unenclosed dumpsters, and vandalism.

Typical examples include:

- Floodplains or flood prone areas
- Inadequate storm drainage systems/evidence of standing water
- Poor fire protection facilities
- Above average incidences of public safety responses
- Inadequate sanitation or water systems
- Existence of contaminants or hazardous conditions or materials
- High or unusual crime statistics
- Open/unenclosed trash dumpsters
- Cracked or uneven surfaces for pedestrians
- Illegal dumping/excessive litter
- Vagrants/vandalism/graffiti/gang activity
- Open ditches, holes, or trenches in pedestrian areas
- Poorly lit or unlit areas
- Insufficient grading/steep slopes
- Unsafe or exposed electrical wire

### **Site Improvements**

The following conditions evaluate the Urban Renewal Law blight factor “(e) *deterioration of site or other improvements,*” by evidence of overall maintenance deficiencies within the plan area including, deterioration, poorly maintained landscaping, and overall neglect.

Examples of blighted site improvements include:

- Neglected properties or evidence of maintenance deficiencies
- Deteriorated signage or lighting
- Deteriorated fences, walls, or gates
- Deteriorated on-site parking surfaces, curb and gutter, or sidewalks
- Unpaved parking lot (commercial properties)
- Poor parking lot/driveway layout
- Poorly maintained landscaping/overgrown vegetation

### **Infrastructure**

The observation of the following infrastructure insufficiencies is evidence of Urban Renewal Law blight factor “(f) *unusual topography or inadequate public improvements or utilities.*”

Prototypical features of blight under this topic include:

- Deteriorated pavement, curb, sidewalks, lighting, or drainage
- Lack of pavement, curb, sidewalks, lighting, or drainage
- Presence of overhead utilities or billboards
- Inadequate fire protection facilities/hydrants
- Inadequate sanitation or water systems
- Unusual topography

### **Endangerment**

The following conditions evaluate the Urban Renewal Law blight factor "(h) *The existence of conditions that endanger life or property by fire or other causes.*"

Typical examples of conditions that portray this criterion include:

- Fire safety problems
- Hazardous contaminants
- High frequency of crime
- Floodplain or flood hazards

### **Environmental Contamination**

The following conditions are evidence of Urban Renewal Law blight factor "(j) *Environmental contamination of buildings or property, through assessment of chemical or biological contamination. Such contamination may pose a health risk or other problems, such as inhibit development.*

Typical examples of conditions that portray this criterion include:

- Environmental contamination of buildings
- Environmental contamination of property

### **Vacancy**

The following conditions are evidence of Urban Renewal Law blight factor "(k) *the existence of health, safety, or welfare factors requiring high levels of municipal services or substantial physical underutilization or vacancy of sites, buildings, or other improvements.*" Various examples of features that fulfill this criterion include:

- An undeveloped parcel in a generally urbanized area
- Disproportionately underdeveloped parcel
- Vacant structures
- Vacant units in multi-unit structures

### **Other Factors**

The remaining three blight factors specified in the Urban Renewal Law were not investigated further due to sufficient evidence from the visual field survey supporting a condition of blight in 8 of the 11 blight factors.

*(a) Slum, deteriorated, or deteriorating structures.*

*(g) Defective or unusual conditions of title rendering the title nonmarketable.*

*(I) Buildings that are unsafe or unhealthy for persons to live or work in because of building code violations, dilapidation, deterioration, defective design, physical construction, or faulty or inadequate facilities.*

### 3. Blight Analysis Findings

This section summarizes the findings of the visual field survey and additional data analysis of the Study Area conducted in March 2023. **Table 2** summarizes the specific blight conditions observed. These conditions are further detailed following the table, for each specific category, and include image documentation or supportive data.

**Table 2. Blight Conditions Observed in Study Area**

Conditions Observed			
1. Street Layout	2.01	Inadequate street or alley width / cross-section / geometry	
	2.02	Poor provisions or unsafe conditions for vehicular traffic	X
	2.03	Poor provisions or unsafe conditions for pedestrians	X
	2.04	Insufficient roadway capacity leading to unusual congestion	X
	2.05	Inadequate emergency vehicle access	X
	2.06	Poor vehicular or pedestrian access to buildings or sites	X
	2.07	Excessive curb cuts / driveways along commercial blocks	X
	2.08	Poor internal vehicular or pedestrian circulation	
2. Lot Layout	3.01	Faulty or inadequate lot shape or layout	X
	3.02	Poor vehicular access	X
	3.03	Lot size is deemed not useful	
3. Unsafe / Unsanitary	4.01	Floodplains or flood prone areas	X
	4.02	Inadequate storm drainage systems/evidence of standing water	
	4.03	Poor fire protection facilities	
	4.04	Above average incidences of public safety responses	
	4.05	Inadequate sanitation or water systems	
	4.06	Existence of contaminants or hazardous conditions or materials	
	4.07	High or unusual crime statistics	
	4.08	Open / unenclosed trash dumpsters	X
	4.09	Cracked or uneven surfaces for pedestrians	X
	4.10	Illegal dumping / excessive litter	X
	4.11	Vagrants/vandalism/graffiti/gang activity	X
	4.12	Open ditches, holes, or trenches in pedestrian areas	
4. Site Improvements	5.01	Neglected properties or evidence of maintenance deficiencies	X
	5.02	Deteriorated signage or lighting	X
	5.03	Deteriorated fences, walls, or gates	X
	5.04	Deteriorated on-site parking surfaces, curb & gutter, or sidewalks	X
	5.05	Unpaved parking lot (commercial properties)	X
	5.06	Poor parking lot / driveway layout	
	5.07	Poorly maintained landscaping / overgrown vegetation	X
5. Infrastructure	6.01	Deteriorated pavement, curb, sidewalks, lighting, or drainage	X
	6.02	Lack of pavement, curb, sidewalks, lighting, or drainage	X
	6.03	Presence of overhead utilities or billboards	X
	6.04	Inadequate fire protection facilities / hydrants	
	6.05	Inadequate sanitation or water systems	
	6.06	Unusual topography	
6. Endangerment	8.01	Fire safety problems	
	8.02	Hazardous contaminants	
	8.03	High frequency of crime	
	8.04	Floodplain or flood hazards	X
7. Env. Contamination	10.01	Environmental contamination of buildings	
	10.02	Environmental contamination of property	X
8. Vacancy	11.04	An undeveloped parcel in a generally urbanized area	X
	11.05	Disproportionately underdeveloped parcel	
	11.06	Vacant structures	X
	11.07	Vacant units in multi-unit structures	

**1. Street Layout: Poor provisions or unsafe conditions for vehicular traffic and pedestrians, poor pedestrian access to buildings or sites and excessive curb cuts or driveways along commercial blocks.**

Throughout the Study Area, poor provisions or unsafe conditions for vehicular traffic were observed in the form of deteriorated streets and parking lots. Examples of potholes and deteriorated pavement were identified around Birch Street and East 70<sup>th</sup> Avenue, Dahlia Street and 72<sup>nd</sup> Avenue, and along Brighton Boulevard on the east side of the Study Area, as shown in **Figure 2**.

**Figure 2. Poor provisions or unsafe conditions for vehicular traffic**



Furthermore, there are properties without access for emergency vehicles, which hinders their development or redevelopment potential. These properties are located throughout the Study Area as illustrated in **Figure 8** and further described on page 18. Examples of this lack of emergency vehicle access include the property directly west of the 72<sup>nd</sup> Avenue Commuter Rail Station where there is limited vehicle access across the train tracks and the parcels located west of 64<sup>th</sup> Avenue where the street comes to a dead end and there is a poorly maintained bridge, shown below in **Figure 3**. In order to develop these sites for any use, two improved points of ingress and egress for emergency vehicles are required.



**Figure 3. Inadequate emergency vehicle access**



Additionally, significant traffic congestion occurs along Colorado Boulevard, south of 72<sup>nd</sup> Avenue due to large trucks. The street is inadequate to accommodate the turning motions of large trucks, which causes significant and unusual congestion.

Unsafe pedestrian conditions were also present throughout the Study Area in the form of eroded sidewalks, and sidewalks that would end abruptly or the total absence of pedestrian walkways, shown below in **Figure 4**. These conditions were observed on portions of Brighton Boulevard, portions of Dahlia Street, 72<sup>nd</sup> Avenue, 77<sup>th</sup> Avenue, and 78<sup>th</sup> Avenue as well as parts of Steele Street, and a stretch of road at 78<sup>th</sup> Avenue and York Street. Streets without sidewalks on one or both sides of the street in the Study Area are illustrated below in **Figure 6**. Major streets without sidewalks include Brighton Boulevard, 72<sup>nd</sup> Avenue, 70<sup>th</sup> Avenue, Colorado Boulevard, and 64<sup>th</sup> Avenue. Poor pedestrian access to buildings or sites were also observed at Dahlia Street and 72<sup>nd</sup> Avenue, where in addition to the lack of sidewalks, there was no clear pathway or access to the bus stop at that site, as shown in **Figure 5**.

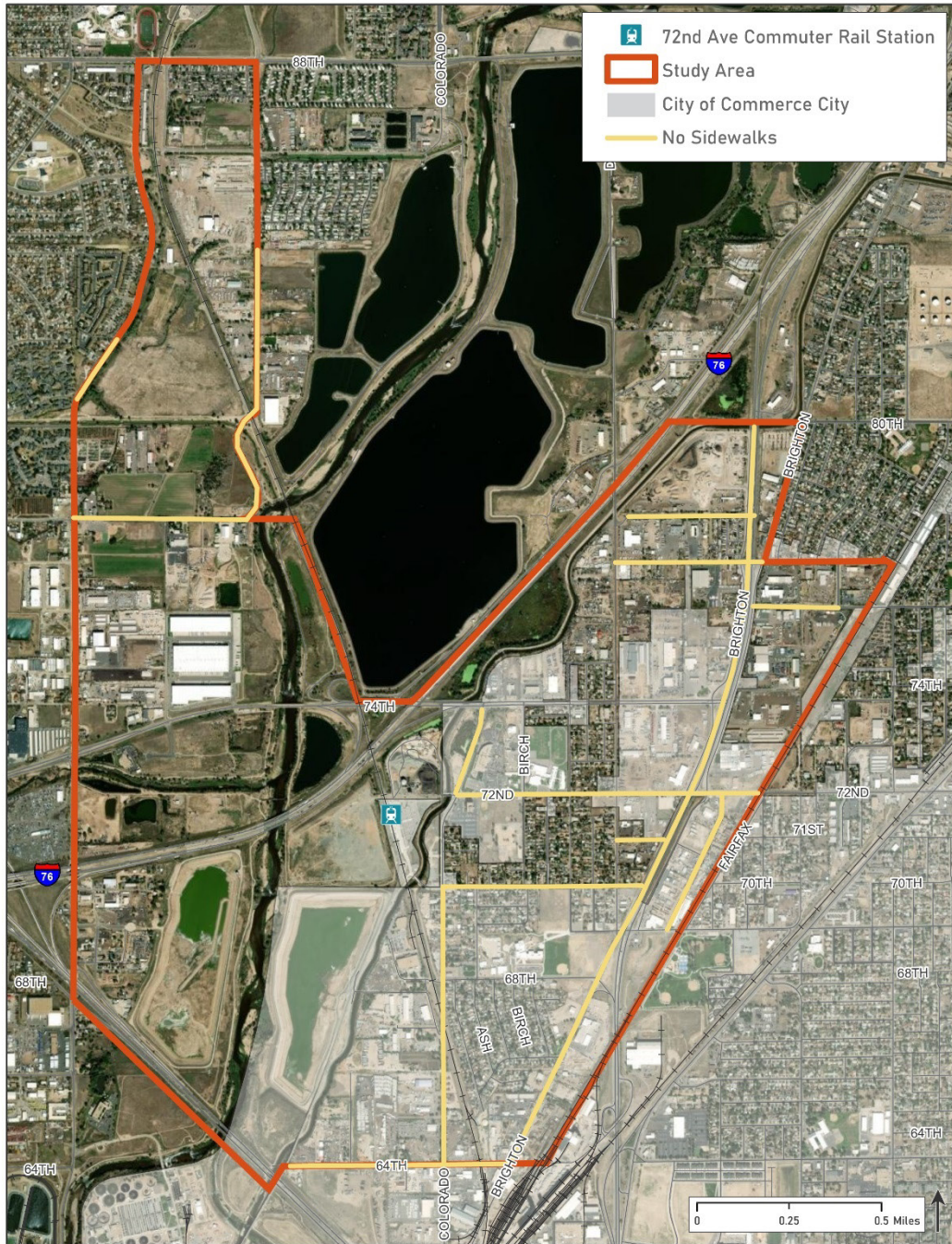
**Figure 4. Poor provisions or unsafe conditions for pedestrians**



**Figure 5. Poor pedestrian access to buildings or sites**



Figure 6. Missing Sidewalks



Furthermore, excessive curb cuts and driveways to businesses were identified along Brighton Boulevard, shown in **Figure 7**. In many areas, there is a complete absence of curbs and therefore no defined ingress and egress locations, which does not meet City development requirements and is also a safety hazard.

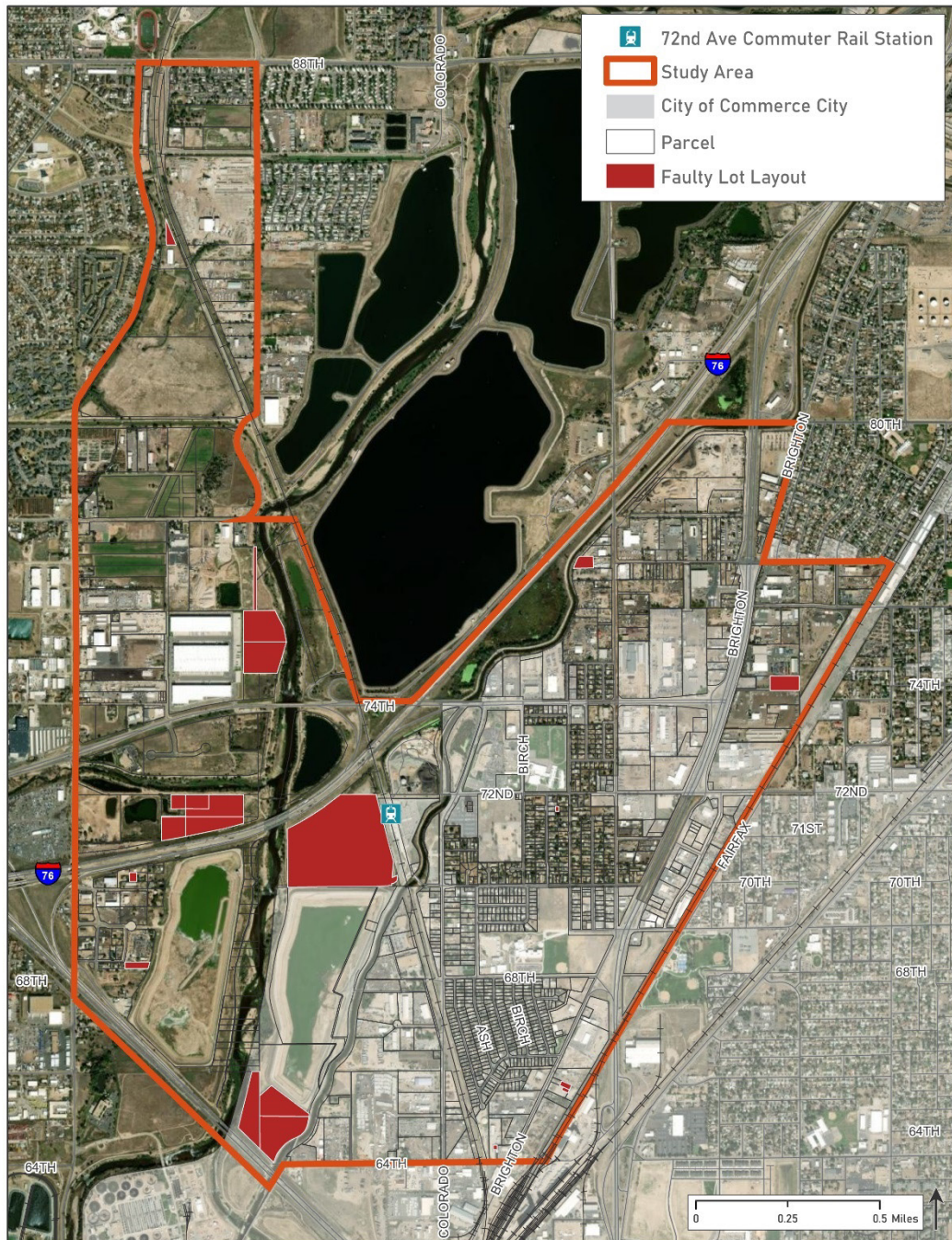
**Figure 7. Excessive curb cuts or driveways along commercial blocks**



## **2. Lot Layout: Faulty or inadequate lot shape or layout**

The Study Area includes 22 parcels with a faulty or inadequate shape or layout, as shown in **Figure 8**. The lack of access to these parcels, as well as their shape and size create impediments for development. These parcels require either aggregation with adjacent parcels or easements to establish access to the nearest street. The nearly 40-acre parcel directly to the west of 72<sup>nd</sup> Avenue Commuter Rail Station does not have an access point. It is constrained by the highway to the north, train tracks to the east, and the river and pond to the south and west. This is a large parcel with transit oriented development (TOD) potential but will require two access points over the rail tracks to 72<sup>nd</sup> Avenue and Colorado Boulevard.

**Figure 8. Faulty or inadequate lot shape or layout**



**3. Unsafe/Unsanitary Conditions: Floodplains or flood prone areas, open or unenclosed trash dumpsters, cracked or uneven pedestrian surfaces, excessive litter, and vandalism/graffiti.**

Throughout the Study Area, unsafe and unsanitary conditions were documented, including flood prone areas, open dumpsters, cracked or uneven pedestrian surfaces, excessive litter, and graffiti.



While litter was scattered throughout the Study Area, excessive trash and unenclosed dumpsters were most prevalent on streets that ran in between the residential and commercial parcels, shown below **Figure 10** and **Figure 11**. The streets where this was prevalent include Colorado Boulevard between 70<sup>th</sup> and 72<sup>nd</sup> Avenues, Dahlia Street between 70<sup>th</sup> and 74<sup>th</sup> Avenues, and at the intersections of 70<sup>th</sup> Avenue and Cherry Street, and 74<sup>th</sup> Avenue and Brighton Boulevard.

**Figure 10. Open or unenclosed trash dumpsters**





**Figure 11. Excessive litter**



Cracked or uneven surfaces for pedestrians were observed along several streets including, but not limited to, Birch Street, Dahlia Street, and Brighton Boulevard, as shown in **Figure 12**. Graffiti was observed along 69<sup>th</sup> Avenue in between Birch and Dahlia Streets, as well as along Dahlia Street and 73<sup>rd</sup> Avenue, as shown in **Figure 13**.

**Figure 12. Cracked or uneven surfaces for pedestrians**



**Figure 13. Vandalism or graffiti**



**4. Site Improvements: Neglected properties or evidence of maintenance deficiencies, deteriorated signage or lighting, deteriorated fences, walls, or gates, deteriorated on-site parking surfaces, curb and gutter, or sidewalks.**

The deterioration and overall neglect of properties throughout the Study Area is well documented. Examples of neglected properties are shown in **Figure 14**. The main conditions of site deterioration include the deterioration of signage and lighting (**Figure 15**), deteriorated fences (**Figure 16**), and deteriorated parking surfaces, curbs and sidewalks (**Figure 17**). Curbs and sidewalks showed major deterioration, in many cases creating a safety hazard for pedestrians. There are multiple commercial properties along Colorado Boulevard with unpaved and unmarked parking lots. Overall, there was evidence that site improvements throughout the area are not being maintained.

**Figure 14. Neglected properties or evidence of maintenance deficiencies**



**Figure 15. Deteriorated signage or lighting**



**Figure 16. Deteriorated fences, walls, or gates**



**Figure 17. Deteriorated on-site parking surfaces, curb & gutter, or sidewalks**



**5. Infrastructure: Deteriorated or lack of pavement, curb, sidewalks, lighting, or drainage, and presence of overhead utilities or billboards.**

Inadequate infrastructure was observed throughout the Study Area, predominantly in the form of deteriorated or missing curbs and sidewalks as shown in **Figure 18**, as well as several missing sidewalk connections. Examples of these signs of deterioration were prevalent in all quadrants of the Study Area and include but are not limited to the primary arterial streets including Steele Street, Colorado Boulevard, and Dahlia Street. There was also the presence of overhead utilities throughout the Study Area, see **Figure 19**. Additionally, overgrown vegetation is apparent throughout the Study Area largely in areas adjacent to the ROW in which vegetation is not being properly maintained, as shown in **Figure 20**.

**Figure 18. Lack of pavement, curb, sidewalks, lighting, or drainage**



**Figure 19. Presence of overhead utilities or billboards**



**Figure 20. Overgrown vegetation**



**6. Endangerment: floodplain or flood hazards.**

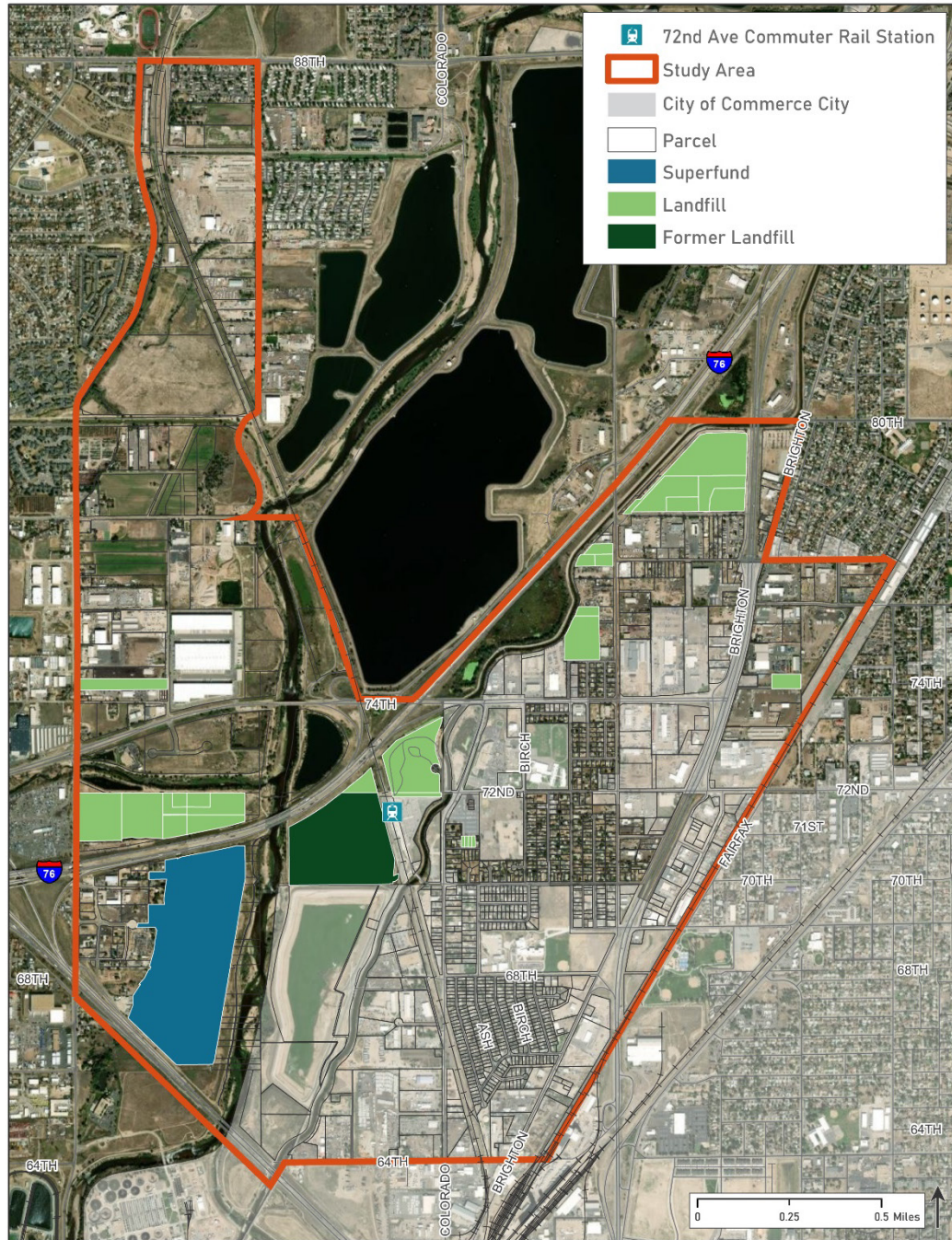
Endangerment was identified in the Study Area in the form of flood hazards. There are several areas that sit within a Special Flood Hazard Area (SFHA) due to the ponds and South Platte River that flow within the west side of the Study Area, as shown previously in **Figure 9**.

**7. Environmental Contamination of Property**

Environmental contamination was identified throughout the Study Area with the presence of existing and former landfills as well as a superfund site, as shown in **Figure 21**. There are 28 parcels currently identified as a landfill, all of which are located in unincorporated Adams County. The large parcel west of the 72<sup>nd</sup> Avenue Commuter Rail Station is a former landfill site. According to the parcel history, in 2002 the property was used as an inert materials fill and an old gravel pit was filled with construction debris. In addition, there is a large superfund site located south of Interstate 76 and to the west of the South Platte River. All of these parcels require a level of environmental remediation and/or significant development requirements in order for development to occur.



**Figure 21. Environmental contamination of properties**



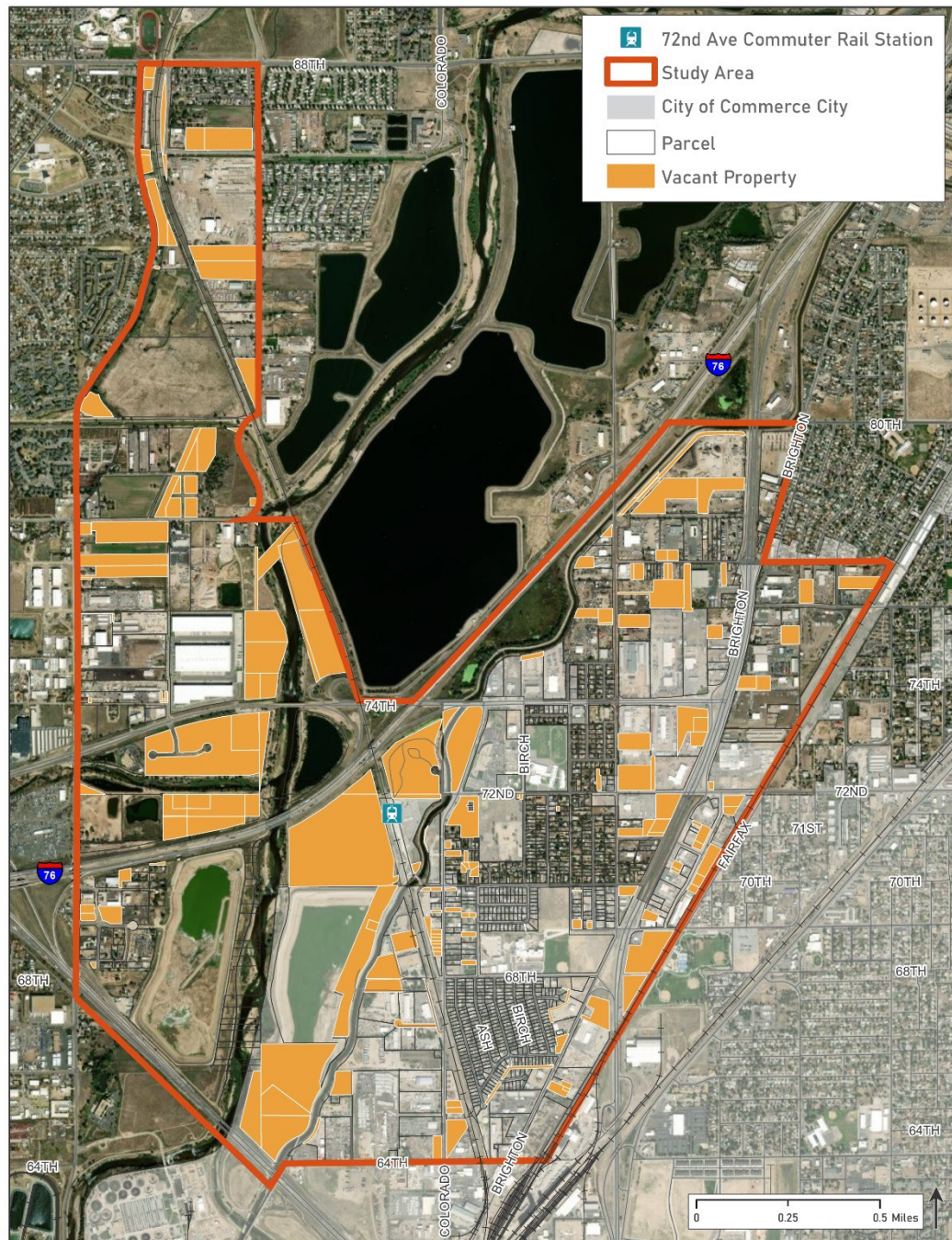
**8. Vacancy: An underdeveloped parcel in a generally urbanized area, and vacant structures.**

Vacant buildings were seen in the Study Area with boarded up buildings and lease signs, as shown in **Figure 22**. Vacant properties were identified as having no building improvements and can include parking lots. Throughout the Study Area there are numerous vacant properties, which are underdeveloped in an urbanized area. In total there are 188 vacant parcels, equivalent to an estimated 360 acres, as shown below in **Figure 23**. When considering only parcels classified as agricultural, commercial or industrial, an estimated 27 percent of those parcels are vacant, which is above average rates and indicative of a largely underdeveloped area. Additionally, there are several vacant parcels in proximity to the 72<sup>nd</sup> Avenue Commuter Rail Station that are underutilized with respect to their potential for TOD.

**Figure 22. Vacant buildings and properties**



**Figure 23. Vacant properties**



Parcels categorized exempt make up 35 percent of the overall total of vacant parcels within the Study Area. Notably, two of the larger sites were previous schools; Adams City High School and Alsup Elementary. The high school was vacated in 2009, and Alsup Elementary was vacant until the School Board decided to demolish it in 2021, due to building contamination and safety threats. These properties are also underdeveloped land adjacent to residential neighborhoods and therefore have a negative impact on neighborhood conditions.

## 4. Conclusions

Based on the definition of a blighted area in the Colorado Urban Renewal Law, Colorado Revised Statutes (C.R.S.) § 31-25-101 et seq., and based on the field survey and data analysis against the blight criteria, EPS concludes that the Study Area meets the definition of a blighted area as defined in the Colorado Urban Renewal Law, Colorado Revised Statutes (C.R.S.) § 31-25-101 et seq.

The Study documented 8 of the 11 factors of blight within the Study Area. Therefore, this blighted area, as written in the Urban Renewal Law, “substantially impairs or arrests the sound growth of the municipality, retards the provision of housing accommodations, or constitutes an economic or social liability, and is a menace to the public health, safety, morals, or welfare.”

Evidence of the following Urban Renewal Law blight factors are documented in this report:

- (b) Predominance of defective or inadequate street layout.*
- (c) Faulty lot layout in relation to size, adequacy, accessibility, or usefulness.*
- (d) Unsanitary or unsafe conditions.*
- (e) Deterioration of site or other improvements.*
- (f) Unusual topography or inadequate public improvements or utilities.*
- (h) The existence of conditions that endanger life or property by fire or other causes.*
- (j) Environmental contamination of buildings or property.*
- (k.5) The existence of health, safety, or welfare factors requiring high levels of municipal services or substantial physical underutilization or vacancy of sites, buildings, or other improvements.*

Evidence of the following Urban Renewal Law blight factors were not visually observable, and based on the presence of other, more significant physical conditions, these factors of blight, although they may or may not exist, did not require further investigation.

- (a) Slum, deteriorated, or deteriorating structures.*
- (g) Defective or unusual conditions of title rendering the title nonmarketable.*
- (I) Buildings that are unsafe or unhealthy for persons to live or work in because of building code violations, dilapidation, deterioration, defective design, physical construction, or faulty or inadequate facilities.*

As established by Urban Renewal case law in Colorado, this assessment is based on the condition of the Study Area as a whole. There is substantial evidence and documentation of 8 of the 11 blight factors in the Study Area as a whole.