I-270 HEALTHY COMMUNITIES NO-WIDENING ALTERNATIVE

Submitted by GreenLatinos and Informed by the 2025 Design Assistance Team ('DAT') Report

This Healthy Communities No-Widening Alternative is aimed at reducing congestion along I-270 through means other than adding new lanes while *improving* conditions for the communities that live along the corridor. It has three parts: (1) a differential tolling program that prioritizes transit, trucks, and local residents; (2) increased transit capacity on and near I-270, in partnership with RTD and/or other agencies; and (3) public health and safety improvements, including green buffer spaces, air monitoring tools, and enhanced connectivity. These concepts are drawn from the 2025 DAT report.

I. Differential Tolling

CDOT should employ differential tolling on all existing lanes. DAT Report at 18–19. Differential tolling would reduce congestion, keep freight trucks off residential streets, and prioritize transit, all while raising revenue and avoiding costs for nearby residents. CDOT has made clear that congestion reduction is a major goal for the I-270 improvement project, and Colorado has recently been contending with a significant budget shortfall. Automated differential tolling using automated license plate reader (ALPR) technology presents an effective solution: it can reduce congestion while raising revenue.

CDOT should implement a tolling system that distinguishes between users (including transit, trucks, residents, and high occupancy vehicles) and applies appropriate toll rates accordingly to manage congestion. The raised revenues should be directed toward beneficial projects in the community, including improved transit, safer streets, and new bicycle and pedestrian infrastructure. A differential tolling model along I-270 would facilitate transit vehicle and commercial truck movement and keep trucks on I-270 (rather than local streets) while reducing I-270 passenger vehicles and encouraging higher occupancy vehicles. The system should eliminate tolls for license plates registered to local neighborhoods to avoid impact on local residents.

This approach could be paired with complementary vehicle management technologies. Connected vehicle technology—specialized sensors and infrastructure—manages vehicle speeds to reduce speed differentials, provide advance notice of danger, decrease lane changing and friction in congested areas, and maintain closer vehicle spacing safely to create more road capacity without the need for added lanes. Similarly, automated enforcement ALPR technology can be used on the local street network for enforcement against trucks and commuter traffic looking for free alternative routes from the Interstate.

¹ This alternative includes proposed "safety improvements and interchange reconfigurations" as described in FHWA's Notice of Intent to prepare an EIS. 89 Fed. Reg. 67510, 67511 (Aug. 20, 2024). Those measures include critical bridge repairs as well as "widening shoulders and redesigning the I–76, York Street, Vasquez Boulevard, and Quebec Street interchange on- and

To implement this approach, CDOT should take advantage of federal programs that would allow tolling on I-270. These include the Value Pricing Pilot Program (VPPP) and Interstate System Reconstruction and Rehabilitation Pilot Program (ISRRPP). "The VPPP in particular lends itself well to CDOT's stated goal of congestion reduction, including for I-270's existing lanes." DAT Report at 18–19.

II. Added Regional Transit Capacity

CDOT should partner closely with RTD (and other agencies, as needed) to significantly increase transit options on and close to I-270. DAT Report at 25. Currently, driving remains the primary mode of travel in the I-270 corridor, and only one RTD bus route uses the 270 corridor: the FF5, or Flatiron Flyer 5, connecting Boulder to Aurora along US-36. That bus route runs 7 times eastbound and 4 times westbound per day, and not at all on the weekends. Meanwhile, according to CDOT's 2022 Origin/Destination study, 44% of trips on I-270 are "long distance" between US-36 and Aurora, "which suggests high potential for additional transit serving that route." *Id.* For that reason and many others, Commerce City is "ready-made for significant and complementary investments in transit" along I-270. *Id.* CDOT and RTD should apply the origin destination study to develop additional transit routes that move people through the I-270 corridor without the need for passenger vehicles. Reliability and frequency should be the guiding tenets of these routes.

CDOT and RTD should design the I-270 transit build-out to support complementary infrastructure. This includes, for example, mobility hubs, micro-transit and/or on-demand transit, shared micro-mobility options, and enhanced bicycle and pedestrian infrastructure. DAT Report at 23–25.

III. Public Health and Safety Improvements

CDOT should use the I-270 project to enhance public health, safety, and mobility in spaces intersecting and adjacent to the corridor. While reducing congestion and moving people through the corridor are important goals, CDOT should also use the project to counteract—not add to—the health and safety burdens local communities bear. Among numerous possible improvements, CDOT should (a) add green spaces that mitigate pollution and noise; (b) install air quality monitoring systems in and around homes; and (C) increase connectivity near the freeway.

A. Green space

Green space can enhance quality of life while reducing noise and air pollution. CDOT should construct green buffers, also known as vegetative or riparian buffers, along I-270. DAT Report at 26–28. These areas can act as a natural barrier between the highway and residential neighborhoods, pedestrian scaled commercial zones, public infrastructure, or ecologically sensitive areas such as Sand Creek. Green buffers would help mitigate the flow and transmission of harmful pollutants by capturing and sequestering carbon and releasing oxygen to help mitigate greenhouse gases. They will also create useful separation, providing a sense of safety and adding aesthetic value to the community. Green buffers can also help reduce highway traffic noise, capture and absorb stormwater runoff and thus filter pollutants before they reach streams,

and stabilize slopes and prevent soil erosion. CDOT should further construct green buffers in other areas near I-270, between industrial and residential developments, as an additional commitment to impacted communities. These green spaces will serve to connect the area's existing green network, including parks, gardens, trails, and greenways (such as the Sand Creek area).

B. Air quality monitoring & remediation

CDOT should help minimize harmful effects from I-270 traffic by offering air quality monitoring and remediation in and near homes. DAT Report at 28. Underserved communities in CCND are in proximity to multiple air emissions sources, including industrial facilities and multiple major highways in addition to I-270. Air monitors would help evaluate air quality and determine if air is safe for human health and the environment. CDOT should therefore develop "a network of stationary and mobile low-cost, criteria air pollutant monitors that will continuously monitor air quality conditions in the communities with outdoor air quality risk." *Id.* These monitors should be available in shared community spaces as well as homes, for residents who want them. Remediation options, such as air filters and phytoremediation technologies, should also be deployed.

C. Connectivity

CDOT should use the I-270 project to improve connectivity and public safety near the corridor. Such improvements should include additional crossings and improved lighting for both vehicles and pedestrians, including at on- and off-ramp intersections. DAT Report at 30. The I-270 corridor has limited pedestrian and bicycle crossings, making it difficult for residents to safely access destinations on either side. "Increasing the number of pedestrian overpasses and designing them to be not only safe but green and aesthetically pleasing would be beneficial to the environment and the community." *Id.* Specifically, these crossings should be land bridges, which allow people, animals, and plants to cross, aiding the ecology around Sand Creek and providing much more pleasant pathways for residents.

To improve general connectivity, CDOT should also partner closely with RTD (and other agencies, as needed) to improve access to transit for the local community. For example, CDOT should consider the planned Bus Rapid Transit improvements on Colorado Boulevard and work with RTD to ensure that the community can access that line via transit or micromobility solutions.

Any additional opportunities that CDOT has to improve the corridor for nearby residents should be undertaken.

Conclusion

The framework above provides a much-needed alternative to highway widening. CDOT should focus its efforts on these elements, seeking continuous community input as it fleshes out details. By centering the project on these measures, instead of new, traffic-inducing lanes, CDOT can meet its goal of reducing congestion while avoiding—and even reversing—environmental injustice that has long plagued Commerce City and North Denver communities.