Agency Coordination Plan

I-270 Corridor Improvements Environmental Impact Statement
Identification Number FHWA-CO-EIS-24-001
Federal Project No.: STU 2706-046, CDOT Project Code: 25611
July 2024

Traducción al español disponible, para solicitarlo mande un correo electrónico a cdot_i270@state.co.us.

Contents

Agency Coordination Plan **1**
1.1 Introduction 1
1.2 Project Background 1
1.2.1 Project Area 1
1.2.2 Draft Purpose and Need 3
1.2.3 Preliminary Alternatives 4
1.3 Agency Roles 10
1.4 Project Schedule and Coordination Points 18
1.5 Permitting Timetable 20
1.6 Public Involvement 21
1.6.1 Outreach Conducted to Date 22
1.6.2 Ongoing Outreach 22

Figures

Figure 1. Project Location 2
Figure 2. Overview of Project Area 3
Figure 3. No Action Alternative (west of Vasquez Boulevard) 4
Figure 4. No Action Alternative (east of Vasquez Boulevard) 4
Figure 5. Bicycle, Pedestrian, and Transit Enhancements Alternative 5
Figure 6. Three General-Purpose Lanes Alternative 6
Figure 7. Two General-Purpose Lanes and One Transit-Only Lane Alternative 7
Figure 8. Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative 8
Figure 9. Three General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative 9
Figure 10. Two General-Purpose Lanes and Two Express Lanes that Accommodate Transit Alternative 10
Figure 11. Draft I-270 Improvements Project EIS Schedule 18

Tables

Table 1. Lead Agencies 11
Table 2. Participating and Cooperating Agencies 13
Table 3. Required Permits by Agency and Project Phase 20

Acronyms and Abbreviations

CDOT	Colorado Department of Transportation
CDPHE	Colorado Department of Public Health and Environment
CFR	Code of Federal Regulations
EIS	Environmental Impact Statement
FHWA	Federal Highway Administration
I-25	Interstate 25
I-270	Interstate 270
I-70	Interstate 70
NEPA	National Environmental Policy Act
NOI	Notice of Intent
ROD	Record of Decision
U.S.C.	United States Code

1.1 Introduction

The Colorado Department of Transportation (CDOT) and the Federal Highway Administration (FHWA) are planning to conduct an Environmental Impact Statement (EIS) process to evaluate potential improvements to provide safe and reliable travel along the Interstate 270 (I-270) Corridor. This agency coordination plan is being prepared in accordance with the requirements of Title 23 United States Code (U.S.C.) 139 and 40 Code of Federal Regulations (CFR) 1500-1508.

CDOT and FHWA are the lead agencies for this National Environmental Policy Act (NEPA) process, which was initiated in 2020 during the coronavirus pandemic, initially anticipating an Environmental Assessment. Moving into 2023, CDOT determined a more detailed environmental review was needed and requested that an EIS be prepared.

This Coordination Plan defines the process by which the lead agencies will coordinate with cooperating and participating agencies for the EIS. This Coordination Plan:

- Provides a brief project background and description.
- Identifies and describes the roles and responsibilities of Lead, Cooperating, and Participating agencies.
- Outlines collaboration at key points and milestones in the NEPA process.
- Identifies the public involvement activities that will also provide opportunities for agency involvement and information sharing.

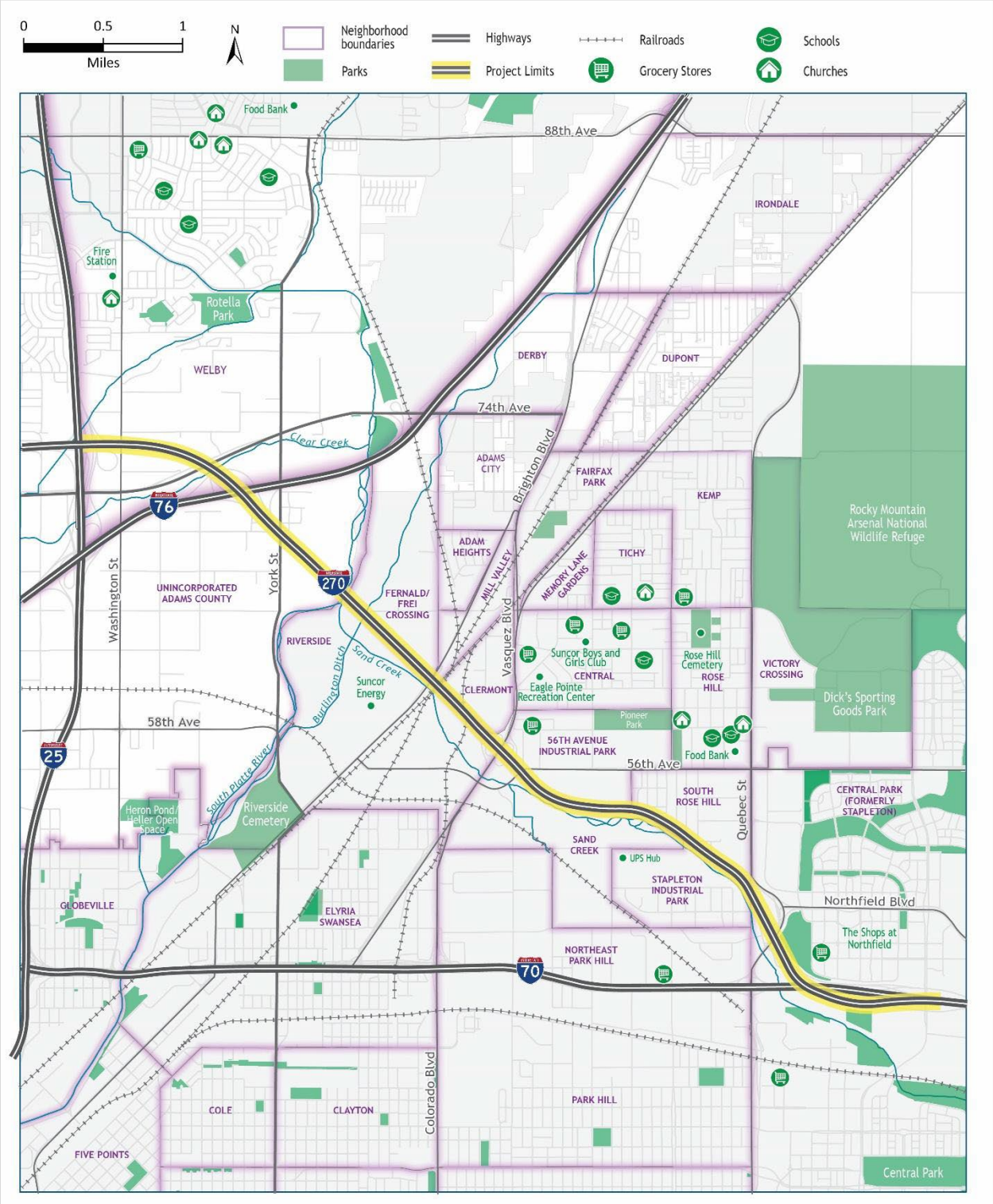
The Coordination Plan will be updated periodically to reflect any changes to the project schedule and other items that may require updating over the course of the EIS process.

1.2 Project Background

1.2.1 Project Area

I-270 runs southeast from Adams County toward Boulder County in the northern Denver metropolitan area. The study limits include the full extent of I-270 from Interstate 25 (I-25) to Interstate 70 (I-70; Figure 1). Every day more than 100,000 vehicles travel the highway, and congestion and travel delays are persistent. About 10 percent of its daily traffic is freight trucks. The highway was originally constructed in the 1960s and needs modernization. Deficient bridges and pavement require regular maintenance and emergency repairs, which often require lane closures that exacerbate delays.

Figure 1. Project Location



Natural stream features, railroads, highways, and industrial development bisect the area and have shaped the project area and affected surrounding communities (Figure 2.). I-270 crosses the Union Pacific Railroad and BNSF Railway, as well as the South Platte River, Clear Creek, and Burlington Ditch.

Figure 2. Overview of Project Area

Culturally diverse neighborhoods are interspersed throughout the project area. Residents and other groups have raised concerns that communities in the study area may not experience environmental justice. Environmental justice is defined in various ways in both state and federal laws, regulations, and/or guidance, and generally means fair treatment and meaningful involvement of all people regardless of income, race, color, national origin, Tribal affiliation, or disability.

1.2.2 Draft Purpose and Need

The preliminary purpose of the I-270 Corridor Improvements Project is to implement transportation solutions that modernize the I-270 Corridor to accommodate existing and forecasted transportation demands.

The identified transportation needs are as follows:

- Traveler safety on the corridor
- Travel time and reliability on the corridor
- Transit on the corridor
- Bicycle and pedestrian connectivity across I-270
- Freight operations on the corridor

In addition to addressing project needs, CDOT, FHWA, and Participating Agencies have established a key project goal: to minimize environmental and community impacts resulting from the project.

1.2.3 Preliminary Alternatives

The preliminary alternatives under consideration are summarized below. The preliminary alternatives will go through a screening process, informed by public and agency input through the scoping process. As a result of the screening process, one or more of the preliminary alternatives may be screened out and not fully analyzed in the EIS or other alternatives may be added.

1.2.3.1 No Action Alternative

The No Action Alternative would maintain the existing highway configuration of two general-purpose travel lanes in each direction. Bridges and pavement would continue to be repaired but underlying infrastructure deficiencies would remain. Figure 3 and Figure 4 illustrate the typical section west (Figure 3) and east (Figure 4) of Vasquez Boulevard. Median and shoulder widths vary in the existing condition and would continue to vary under the No Action Alternative.

Figure 3. No Action Alternative (west of Vasquez Boulevard)

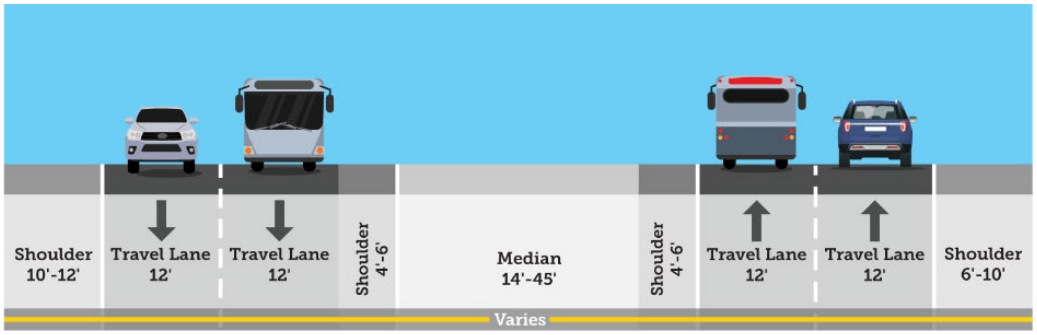
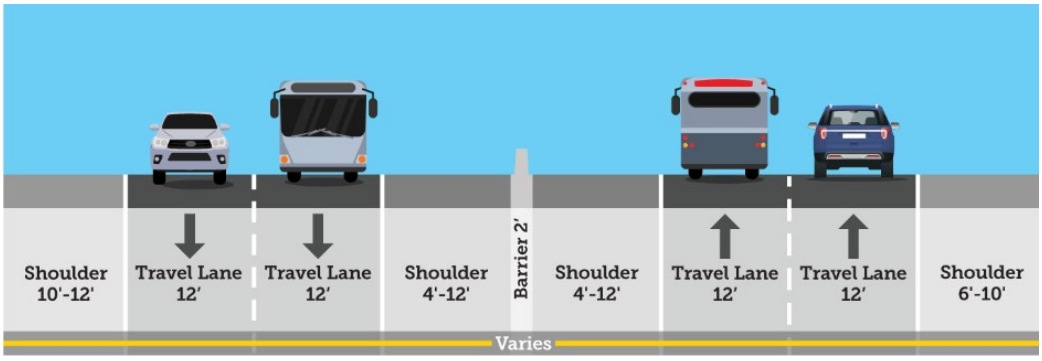


Figure 4. No Action Alternative (east of Vasquez Boulevard)

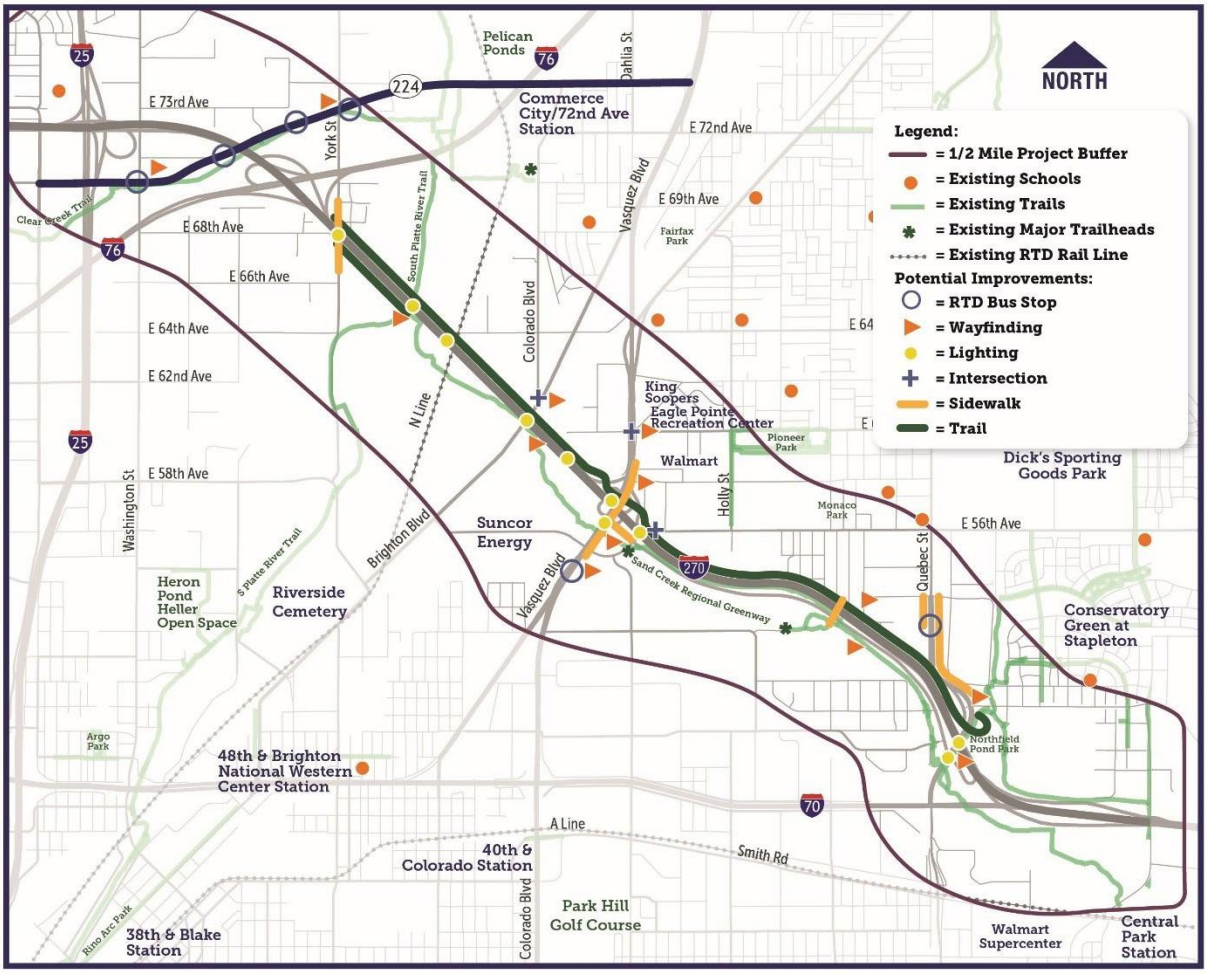


1.2.3.2 Bicycle, Pedestrian, and Transit Enhancements Alternative

This alternative focuses on improvements to bicycle, pedestrian, and transit connections in lieu of additional highway capacity. It would include substantial ongoing maintenance and

rehabilitation of existing highway structures and pavement and would retain the existing highway configuration (i.e., no added highway capacity). This alternative would include elements such as new or improved bus stops, crossings of I-270, wayfinding, lighting, intersections, sidewalks, and trails, which are still being developed with community input; specifics have not been finalized. Figure 5 illustrates the concept. The roadway configuration would be the same as the No Action typical sections shown in Figure 3 and Figure 4.

Figure 5. Bicycle, Pedestrian, and Transit Enhancements Alternative



1.2.3.3 Minimal Build Alternative

This alternative would not provide any additional I-270 travel lanes. It focuses investments on bringing deficient and obsolete I-270 infrastructure up to current standards, including replacing bridges that are reaching the end of their useful life, and addressing pavement condition and subsurface settling. It would also include safety improvements, such as widening shoulders and redesigning the I-76, York Street, Vasquez Boulevard, and Quebec Street interchange on- and off-ramps to provide adequate acceleration and deceleration lanes to meet design standards. Expanding the width of the shoulders and extending the entrance and exit ramps could help traffic move somewhat more smoothly without adding travel lanes.

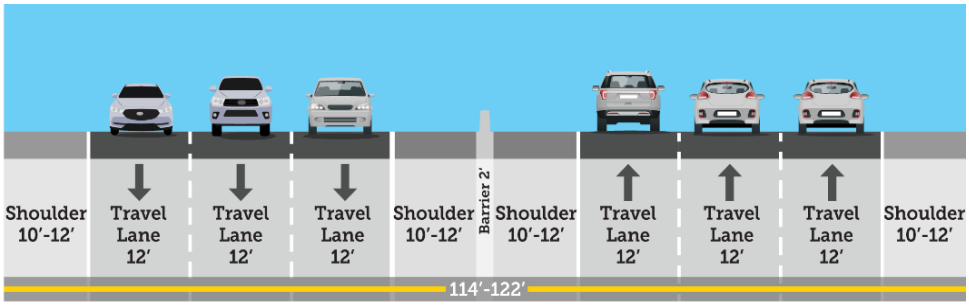
It would also:

- Reconstruct existing pavement and travel lanes.
- Improve shoulders.
- Lengthen and/or redesign exit and entrance ramps at the I-76, York Street, Vasquez Boulevard, and Quebec Street interchanges.
- Add a new eastbound I-270 ramp from northbound Vasquez Boulevard and reconstruct the Vasquez Boulevard interchange.
- Reconstruct bridges that have reached the end of their useful life
- Provide sidewalks at existing crossings of I-270 at York Street, Vasquez Boulevard, and Dahlia Street where there are gaps.

1.2.3.4 Three General-Purpose Lanes Alternative

This alternative reconstructs I-270 to provide three general-purpose lanes in each direction. Figure 6 illustrates the typical section for this proposed build alternative.

Figure 6. Three General-Purpose Lanes Alternative



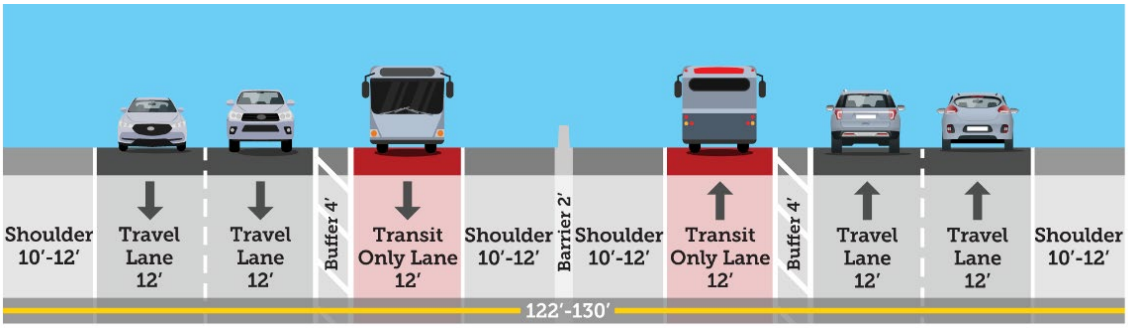
This alternative would:

- Add one general-purpose lane in each direction between I-25 and I-70.
- Reconstruct existing pavement and travel lanes.
- Improve shoulders.
- Lengthen and/or redesign exit and entrance ramps at the I-76, York Street, Vasquez Boulevard, and Quebec Street interchanges.
- Add a new eastbound I-270 ramp from northbound Vasquez Boulevard and reconstruct the Vasquez Boulevard interchange.
- Reconstruct bridges that have reached the end of their useful life
- Provide sidewalks at existing crossings of I-270 at York Street, Vasquez Boulevard, and Dahlia Street where there are gaps.

1.2.3.5 Two General-Purpose Lanes and One Transit-Only Lane Alternative

This alternative reconstructs I-270 with two general-purpose lanes and one transit-only lane in each direction. Figure 7 illustrates the typical section for this proposed build alternative.

Figure 7. Two General-Purpose Lanes and One Transit-Only Lane Alternative



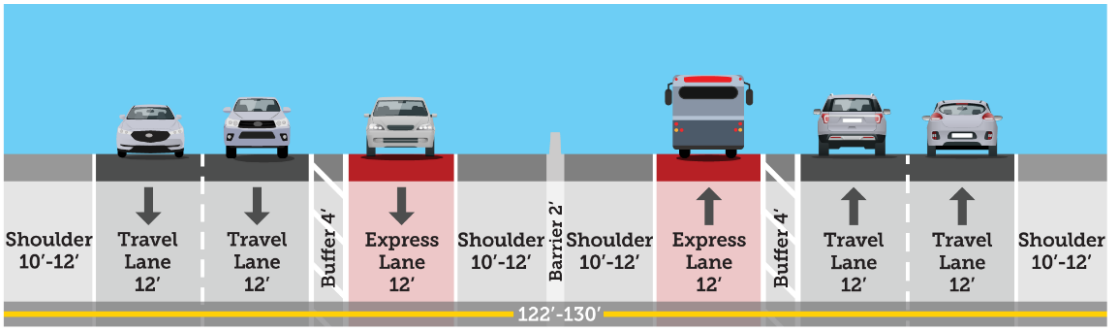
This alternative would:

- Add one transit-only lane in each direction.
- Reconstruct existing pavement and travel lanes.
- Improve shoulders.
- Lengthen and/or redesign exit and entrance ramps at the I-76, York Street, Vasquez Boulevard, and Quebec Street interchanges.
- Add a new eastbound I-270 ramp from northbound Vasquez Boulevard and reconstruct the Vasquez Boulevard interchange.
- Reconstruct bridges that have reached the end of their useful life
- Provide sidewalks at existing crossings of I-270 at York Street, Vasquez Boulevard, and Dahlia Street where there are gaps.

1.2.3.6 Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative

This alternative reconstructs I-270 with two general-purpose lanes and one Express Lane in each direction. Transit vehicles and high-occupancy vehicles (3 or more people) could travel in the Express Lane free of charge. Other travelers, including freight trucks, who choose to pay a fee could also use the new Express Lane. Figure 8 illustrates the typical section for this proposed build alternative.

Figure 8. Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative



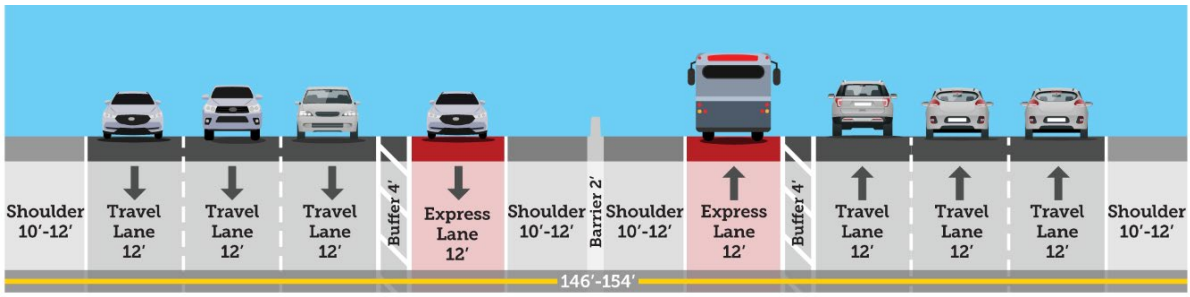
This alternative would:

- Add one Express Lane in each direction that accommodates transit.
- Reconstruct existing pavement and travel lanes.
- Improve shoulders.
- Lengthen and/or redesign exit and entrance ramps at the I-76, York Street, Vasquez Boulevard, and Quebec Street interchanges.
- Add a new eastbound I-270 ramp from northbound Vasquez Boulevard and reconstruct the Vasquez Boulevard interchange.
- Reconstruct bridges that have reached the end of their useful life
- Provide sidewalks at existing crossings of I-270 at York Street, Vasquez Boulevard, and Dahlia Street where there are gaps.

1.2.3.7 Three General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative

This alternative reconstructs I-270 with three general-purpose lanes and one Express Lane in each direction to add one general-purpose lane and one Express Lane in each direction. Transit vehicles and high-occupancy vehicles (3 or more people) could travel in the Express Lane free of charge. Other travelers, including freight trucks, who choose to pay a fee could also use the new Express Lane. Figure 9 illustrates the typical section for this proposed build alternative.

Figure 9. Three General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative



This alternative would:

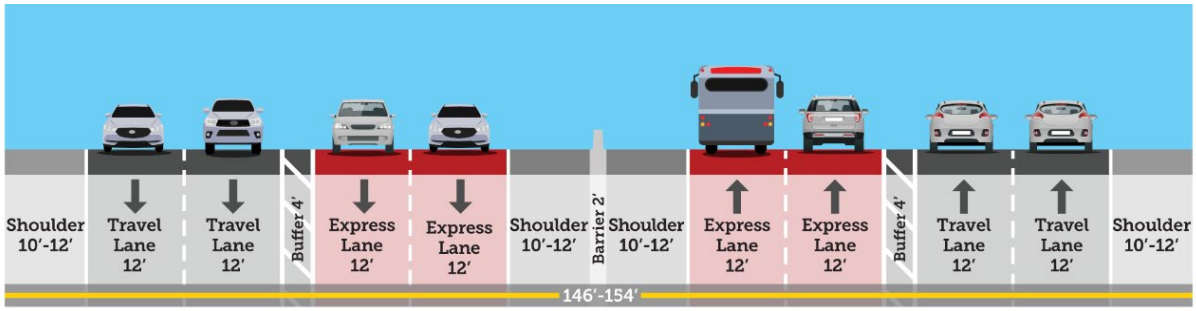
- Add one general-purpose lane in each direction.
- Add one Express Lane in each direction that accommodates transit.
- Reconstruct existing pavement and travel lanes.
- Improve shoulders.
- Lengthen and/or redesign exit and entrance ramps at the I-76, York Street, Vasquez Boulevard, and Quebec Street interchanges.
- Add a new eastbound I-270 ramp from northbound Vasquez Boulevard and reconstruct the Vasquez Boulevard interchange.
- Reconstruct bridges that have reached the end of their useful life
- Provide sidewalks at existing crossings of I-270 at York Street, Vasquez Boulevard, and Dahlia Street where there are gaps.

1.2.3.8 Two General-Purpose Lanes and Two Express Lanes that Accommodate Transit Alternative

This alternative reconstructs I-270 with two general-purpose lanes and two Express Lanes in each direction. Transit vehicles and high-occupancy vehicles (3 or more people) could travel in the Express Lane free of charge. Freight trucks, and other travelers who choose to pay a

fee could also use the new Express Lane. Figure 10 illustrates the typical section for this proposed build alternative.

Figure 10. Two General-Purpose Lanes and Two Express Lanes that Accommodate Transit Alternative



This alternative would:

- Add two Express Lanes in each direction that accommodate transit.
- Reconstruct existing pavement and travel lanes.
- Improve shoulders.
- Lengthen and/or redesign exit and entrance ramps at the I-76, York Street, Vasquez Boulevard, and Quebec Street interchanges.
- Add a new eastbound I-270 ramp from northbound Vasquez Boulevard and reconstruct the Vasquez Boulevard interchange.
- Reconstruct bridges that have reached the end of their useful life.
- Provide sidewalks at existing crossings of I-270 at York Street, Vasquez Boulevard, and Dahlia Street where there are gaps.

1.3 Agency Roles

Roles and responsibilities for agencies involved in the EIS process are described in 40 CFR Parts 1500-1508 NEPA Implementing Regulations, 23 CFR Part 771 Environmental Impact and Related Procedures, and 23 U.S.C. 139: Efficient Environmental Reviews for Project Decision-Making and One Federal Decision. FHWA and CDOT are the lead agencies for this EIS process. Agencies are defined as any agency, department, or other unit of Federal, State, local, or Indian tribal government. The environmental review process specifies agency responsibilities based on the following designations.

- Lead Agency (FHWA)—the agency or agencies preparing or having taken primary responsibility for preparing the EIS (40 CFR 1508.1[u]).
- Joint Lead Agency (CDOT)—federal, state, tribal, or local agencies, including at least one federal agency, may act as joint lead agencies to prepare an environmental impact statement or environmental assessment (40 CFR 1508.1[s]). Based on Section

139, CDOT, the project sponsor shall be a joint NEPA Lead Agency (23 U.S.C. 139[c][3]).

- Cooperating Agency—any federal agency (and a state, tribal, or local agency with agreement of the Lead Agency) other than a Lead Agency that has jurisdiction by law or special expertise with respect to any environmental issue.
- Participating Agency—any other Federal or non-Federal agency that may have an interest in the proposed project and has accepted an invitation to be a participating agency (23 CFR 771.107). Any Federal agency that is invited by the Lead Agency to participate in the project development process for a project shall be designated as a participating agency, unless the invited agency informs the Lead Agency in writing that they have no jurisdiction or authority with respect to the project; has no expertise or information relevant to the project; and does not intend to submit comments on the project (23 U.S.C. 139 [d][3]).

CDOT and FHWA as the Lead Agencies have the responsibility to:

- Invite and designate Participating Agencies.
- Develop and implement a Coordination Plan in consultation with Participating and Cooperating Agencies that contains a milestone schedule for completion of the environmental review process.
- Collaborate with Participating and Cooperating Agencies to determine methodologies and the level of detail for the analysis of alternatives.
- Provide opportunities for involvement by the public and agencies in defining the purpose and need and determining the range of alternatives to be evaluated.
- Consider and respond to comments from participating and cooperating agencies on matters within their special expertise or jurisdiction.

Primary contacts for the Lead Agencies are provided in Table 1.

Table 1. Lead Agencies

Agency	Role	Contact
FHWA	Lead Agency	Chris Horn, PE Senior Area Engineer Chris.horn@dot.gov 720-963-3017
CDOT	Joint Lead Agency	David Merenich, PE I-270 Project Director david.merenich@state.co.us 720-933-5755

Cooperating and Participating Agencies have responsibility to:

- Identify as early as practicable any issues of concern regarding potential environmental or socioeconomic impacts of the project.
- Provide comments, responses, studies, or methodologies on areas within their special expertise or jurisdiction.
- Use the process to identify any environmental issues of concern and work cooperatively to resolve issues.
- Consult with the Lead Agencies in developing the agency coordination plan, environmental review schedule, and methodologies and level of analysis required.
- Participate with the lead agencies in defining the purpose and need and determining the range of alternatives to be considered.

Table 2 lists the agencies and tribal governments invited to participate in the environmental review process. For some agencies, multiple divisions or departments may have interest in the project; in those cases, an invitation was extended to the agency administrator identified in Table 2, and individual department leaders were copied on the invitation. In addition to inviting the US Army Corps of Engineers (USACE) be a Cooperating Agency, the lead agencies have also requested to initiate the NEPA/404 Merger process the US Army Corps of Engineers under the agreement among CDOT, FHWA, and USACE for the National Environmental Policy Act / Clean Water Act Section 404 (NEPA/404) merger process for transportation projects in Colorado (January 2019). The agreement has similar coordination responsibilities but requires written concurrence (or non-concurrence) at three key milestones in the EIS process: purpose and need and alternatives screening criteria, alternatives selected for detailed evaluation, and the preferred alternative and LEDPA. Several agencies did not respond to the request to be participating agencies: Department of Local Affairs, Federal Emergency Management Agency, and all federal tribes except the Pawnee Nation of Oklahoma and Northern Cheyenne. The Public Utility Commission requested involvement and is a participating agency in the project. The Colorado State Historic Preservation Office declined to be a participating agency and noted that it would consult with CDOT and FHWA through its established processes under Section 106 of the National Historic Preservation Act.

Table 2. Participating and Cooperating Agencies

Agency	Role/Expertise	Administrator	Type	Status
Environmental Protection Agency	Environmental justice, air quality	K.C. Becker, Region 8 Administrator 1595 Wynkoop Street Denver, CO 80202-1129 Becker.KC@epa.gov	Cooperating	Accepted
United States Army Corps of Engineers	Section 404 of the Clean Water Act	Kiel Downing, Commander and District Engineer, Omaha District Denver Office Omaha District 9307 South Wadsworth Blvd. Littleton, CO 80128 Kiel.g.downing@usace.army.mil	Cooperating	Accepted
Adams County	Local jurisdiction	Neal Bernal, County Manager Adams County Government Center 4430 South Adams County Parkway, Brighton, CO 80601 nbernal@adcogov.org	Participating	Accepted
Apache Tribe of Oklahoma	Tribal interests	Chairman Durell Cooper Apache Tribe of Oklahoma P.O. Box 1330 Anadarko, OK 73005 durellcooper05@gmail.com	Participating	No response
Cheyenne & Arapaho Tribes of Oklahoma	Tribal interests	Governor Reggie Wassana Cheyenne & Arapaho Tribes of Oklahoma P.O. Box 167 Concho, OK 73022 rwassana@cheyenneandarapaho-nsn.gov	Participating	No response
Cheyenne River Sioux Tribe	Tribal interests	Chairman Ryman LeBeau Cheyenne River Sioux Tribal Council P.O. Box 590 Eagle Butte, SD 57625 rymanlebeau.gmail.com	Participating	No response

Agency	Role/Expertise	Administrator	Type	Status
City of Commerce City	Local jurisdiction	Jason Rogers, City Manager 7887 E. 60th Ave., Commerce City, CO 80022 jrogers@c3gov.com	Participating	Accepted
City and County of Denver	Local jurisdiction	Adam Phipps, Executive Director 201 W. Colfax Ave., Second Floor Denver, CO 80202 Adam.Phipps@denvergov.org	Participating	Accepted
Colorado Department of Local Affairs	Environmental justice, socioeconomics	Rick M. Garcia, Executive Director The Department of Local Affairs 1313 Sherman Street Suite #518 Denver, CO 80203 rick.garcia@state.co.us	Participating	No response
Colorado Department of Public Health and Environment	Air quality, environmental justice, hazardous and solid wastes, water quality	Jill Hunsaker Ryan, Executive Director 4300 Cherry Creek S. Dr. Denver, CO 80246 jill.hunsakerryan@state.co.us	Participating	Accepted
Colorado Parks & Wildlife	Wildlife and Senate Bill 40 certification	Jeff Davis, Director 6060 Broadway, Denver, CO 80216 jeffrey.davis@state.co.us	Participating	Accepted
Colorado State Historic Preservation Office	Historic properties and Section 106 of the National Historic Preservation Act	Dawn DiPrince, Executive Director History Colorado 1200 Broadway Denver, CO 80203 dawn.diprince@state.co.us	Participating	Declined
Colorado State Patrol	Law enforcement	Colonel Matthew Packard, Chief 700 Kipling St., Lakewood, CO 80215 Matthew.Packard@state.co.us	Participating	Accepted

Agency	Role/Expertise	Administrator	Type	Status
Comanche Nation of Oklahoma	Tribal interests	Chairman Mark Woommavovah Comanche Nation of Oklahoma P.O. Box 908 Lawton, OK 73502 mark.woommavovah@comanchenation.com	Participating	No response
Denver Regional Council of Governments	Regional planning, transportation improvement programming, traffic modeling	Douglas Rex, Executive Director 1001 17th Street, Suite 700, Denver, CO 80202 drex@drcog.org	Participating	Accepted
Federal Emergency Management Agency	Floodplains	Nancy Dragani, Region 8 Administrator Denver Federal Center, Building 710 P.O. Box 25267 Denver, CO 80255-0267 nancy.dragani@fema.dhs.gov	Participating	No response
Federal Transit Administration	Transit funding and oversight	Cindy Terwilliger, Region 8 Administrator Byron Rogers Federal Building 1961 Stout Street Suite 13-301 Denver, CO 80294 Cindy.Terwilliger@dot.gov	Participating	Accepted
Kiowa Tribe of Oklahoma	Tribal interests	Chairman Lawrence SpottedBird Kiowa Tribe of Oklahoma P.O. Box 369 Carnegie, OK 73015 lspottedbird@kiowatribe.org	Participating	No response
Mile High Flood District	Floodplains, water quality	Laura Kroeger, Executive Director 12575 W. Bayaud Avenue Lakewood, CO 80228 lkroeger@mhfd.org	Participating	Accepted

Agency	Role/Expertise	Administrator	Type	Status
Northern Arapaho Tribe	Tribal interests	Chairman Lloyd Goggles Northern Arapaho Tribe P.O. Box 396 Fort Washakie, WY 82514 lloyd.goggles@northernarapaho.com	Participating	No Response
Northern Cheyenne Tribe	Tribal interests	President Serena Wetherelt Northern Cheyenne Tribe P.O. Box 128 Lame Deer, MT 59043 serena.wetherelt@cheyennenation.com	Participating	Accepted
Oglala Lakota Tribe	Tribal interests	President Frank Star Comes Out Oglala Lakota Tribal Council P.O. Box 2070 Pine Ridge, SD 57770 fstarcomesout@oglala.org	Participating	No response
Pawnee Nation of Oklahoma	Tribal interests	President Misty Nuttle Pawnee Nation of Oklahoma 881 Little Dee Drive Pawnee, OK 74058 mnuttle@pawneenation.org	Participating	Accepted
Public Utilities Commission	Utilities	Rebecca White Colorado Public Utilities Commission 1560 Broadway, Suite 250 Denver, CO 80202 Rebecca.white@state.co.us	Participating	Accepted
Regional Transportation District	Transit services	Debra Johnson, General Manager and CEO 1660 Blake Street Denver, CO 80202 Debra.johnson@rtd-denver.com	Participating	Accepted

Agency	Role/Expertise	Administrator	Type	Status
Rosebud Sioux Tribe	Tribal interests	President Scott Herman Rosebud Sioux Tribe P.O. Box 430, 11th Legion Ave. Rosebud, SD 57570 scott.herman@rst-nsn.gov	Participating	No response
Standing Rock Sioux Tribe	Tribal interests	Chairwoman Janet Alkire Standing Rock Sioux Tribal Council North Standing Rock Ave, Bldg. 1, PO Box D Fort Yates, ND 58538 janet.alkire@standingrock.org	Participating	No Response
United States Fish and Wildlife Service	Section 7 of the Endangered Species Act	Matt Hogan, Regional Director 134 Union Blvd #400, Lakewood, CO 80228 Matt_Hogan@fws.gov	Participating	Accepted

An agency coordination meeting was held on June 8, 2023, to re-introduce agencies to the project, describe the expectations for Cooperating and Participating Agencies, and clarify the scope of the project and NEPA process. A follow up meeting was held on November 1, 2023 to discuss project updates, provide summary of public and community scoping input, and outline next steps.

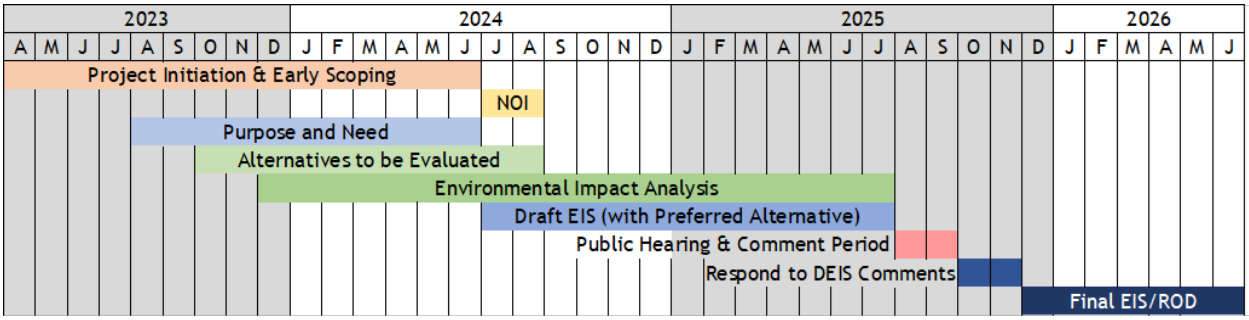
Cooperating Agencies have the same responsibilities as Participating Agencies but have the ability to adopt the Lead Agencies' NEPA document without recirculation after an independent review by the Cooperating Agency. If determined to be appropriate by the Lead Agencies, Cooperating Agencies may also be offered the opportunity to review and comment on other project documents. For example, for the I-270 EIS, the Environmental Protection Agency is anticipated to review and provide comments on air quality and environmental justice analyses and documentation.

If during the project, new information indicates that an agency not previously invited to be a Cooperating Agency does indeed have authority, jurisdiction, acknowledged expertise or information relevant to the project, then the Lead Agencies will invite them to participate as Cooperating Agencies and consider whether this new information affects any previous decisions on the project. Similarly, if an agency not previously identified to be a Participating Agency does indeed have authority, jurisdiction, acknowledged expertise or information relevant to the project, the lead agencies will promptly extend an invitation to that agency to be a Participating Agency.

1.4 Project Schedule and Coordination Points

The project schedule follows the requirements of the environmental review process under 23 U.S.C. 139 and will comply with 40 CFR 1501.10(b)(2), which requires that environmental reviews for major infrastructure projects occur within 2 years (from the date of publication of the Notice of Intent [NOI] to the date of issuance of the Record of Decision [ROD]). In addition, H.R.3684—Infrastructure Investment and Jobs Act codified One Federal Decision and requires that all permits for major projects be issued within 90 days after the ROD. Figure 11 provides an overview of the I-270 EIS schedule.

Figure 11. Draft I-270 Improvements Project EIS Schedule



The Lead Agencies are preparing necessary information to support an NOI, which is expected to be issued in 2024.

The schedule will be updated as needed throughout the EIS process. The Lead Agencies will review ongoing project activities and potential issues that may cause a schedule delay and will communicate any changes to schedule. Strategies will be agreed upon to complete the activities and meet major EIS milestones within the 2-year timeframe from the NOI to ROD and will coordinate permitting to ensure that required permits can be obtained within 90 days of the ROD.

The Lead Agencies will provide regular project updates to the Cooperating and Participating Agencies throughout the EIS process. The agencies, in turn, will share updates, new data, and/or stakeholder feedback related to their area of expertise or jurisdiction that may affect the project or the Lead Agencies' decision-making. Discipline-specific working groups may be convened where multiple agencies have jurisdiction or expertise in specialized topics, such as air quality, traffic modeling, and environmental justice. The Lead Agencies will coordinate monthly to determine when discipline-specific working groups are needed and who should be invited. Additionally, the Lead Agencies will provide quarterly updates via an agency coordination meeting and/or written correspondence to all Cooperating and Participating Agencies. The Lead Agencies will determine the best mode of communication for quarterly updates on a case-by-case basis. These updates will include progress on the following sequential activities in the EIS process:

- Schedule
- NOI
- Public and Agency Scoping, including Agency Coordination and Public Involvement Plans
- Impact Assessment Methodologies
- Purpose and Need
- Evaluation Criteria
- Alternatives to be Evaluated in Detail
- Alternatives Analysis
- Identification of Preferred Alternative
- Draft EIS
- Public Hearing and Comment Period
- Response to DEIS Comments
- Final EIS/ROD

Public and agency comments and input will be considered and responded to throughout the EIS process.

1.5 Permitting Timetable

The Lead Agencies are preparing a permitting timetable to outline the required permitting/consultation processes and timeframes for actions. Table 3 lists the permits and/or approvals that are anticipated, along with the phase when the permit or approval is expected (e.g., NEPA, Design, Construction). Specific target dates will be added when the EIS schedule is finalized.

Table 3. Required Permits by Agency and Project Phase

Agency	Permit/Consultation	Phase
Adams County	Stormwater Quality Permit	Construction
Adams County	Construction stormwater permit	Construction
Adams County	Floodplain development permit	Construction
Colorado Department of Transportation Access Control	Construction access permit (detours and lane closures)	Construction
Colorado Department of Public Health and Environment (CDPHE), Air Pollution Control Division	Project level air quality analyses	NEPA
CDPHE, Air Pollution Control Division	Air Pollutant Emissions Notice and Fugitive Dust Control Plan	NEPA
CDPHE, Hazardous Materials and Waste Management Division	Demolition Permit (asbestos and lead-based paint)	Construction
CDPHE, Water Quality Control Division	Colorado Discharge Permit System Permit, Construction Dewatering Permit	Construction
CDPHE, Water Quality Control Division	Colorado Discharge Permit System Permit, Stormwater Construction Permit	Final design
CDPHE, Water Quality Control Division	Section 401 Water Quality Certification	NEPA
City and County of Denver	Construction stormwater permit	Construction
City and County of Denver	Floodplain development permit	Construction
City and County of Denver	Noise variance for nighttime construction	Construction
City and County of Denver	Building, survey, grading, or other local construction permits	Construction
Colorado Parks and Wildlife	Senate Bill 40 Wildlife Certification	NEPA
Commerce City	Construction stormwater permit	Construction
Commerce City	Noise variance for nighttime construction	Construction
Commerce City	Noise variance for nighttime construction	Construction
Denver Regional Council of Governments	Regional air quality conformity	NEPA
Environmental Protection Agency	Section 404 permit review and comment	NEPA
Federal Emergency Management Agency	Conditional Letter of Map Revision	Final design

Agency	Permit/Consultation	Phase
Federal Emergency Management Agency	Letter of Map Revision	Project completion
Lead Agencies	Issue NOI	NEPA
Lead Agencies	Agency Coordination Plan	NEPA
FHWA	Section 4(f) applicability, evaluation, and coordination with Officials with Jurisdiction	NEPA
Environmental Protection Agency	Notice of Availability of Draft EIS	NEPA
Lead Agencies	Approval/signature of the Draft EIS	NEPA
Environmental Protection Agency	Notice of Availability of FEIS/ROD	NEPA
Lead Agencies	Approval/signature of the FEIS/ROD	NEPA
State Historic Preservation Office	Section 106 consultation: Area of Potential Effects Determination of Eligibility Determination of Effects Memorandum of Agreement if needed	NEPA
Union Pacific Railroad	Access or right of entry permits	Construction
United States Army Corps of Engineers	Jurisdictional Determination	NEPA
United States Army Corps of Engineers	Pre-Construction Notification and/or Section 404 Permit (individual or nationwide)	Final design

Other environmental permits, approvals, reviews, or consultation not anticipated for the project include:

- United States Fish and Wildlife Service, Section 7
- National Park Service, Section 6(f)
- Department of Interior, Section 4(f)

1.6 Public Involvement

The Lead Agencies have developed a Public Involvement Plan outlining goals, challenges, methods, and tools for meaningfully engaging communities in the project area, I-270 users, and government agencies to ensure coordinated and efficient public outreach. These efforts will promote informed decision making, increase transparency, and reduce the participation burdens among area residents and businesses involved in multiple governmental agency efforts in the project area.

The Public Involvement Plan outlines other strategies for encouraging agency input and involvement in collaboration with public outreach and engagement. Strategies to gather and consider input will complement the agency coordination described in Section 4.0

The lead agencies will continue to collaborate, communicate, and cooperate with all entities involved in the environmental review process, including government agencies, private

businesses, interest groups, residents, and the public. Cooperating and Participating Agencies are expected to share project-related input received from the public in conducting their work in the project area related to their areas of expertise or jurisdiction.

1.6.1 Outreach Conducted to Date

Between 2020 and 2022, CDOT held individual meetings with interested stakeholders, including schools, churches, businesses, and health care providers in the project area, as well as focus group meetings with interest groups, such as freight, water, transit, and pedestrian advocacy groups. Two larger virtual public engagement events were held in summer 2020 and winter 2020. CDOT also conducted surveys and sent email updates about the project's progress to the project email distribution list. Due to the coronavirus pandemic and restrictions on or concerns about public gatherings, CDOT felt engagement was more limited than ideal for a project of this scope.

In October 2023, CDOT held an in-person public meeting at the Eagle Pointe Recreation Center in Commerce City. Eighty people attended the meeting; attendees were highly engaged and provided detailed comments and thoughts. Agencies were briefed on the public meeting and input received at the November 1, 2023 agency coordination meeting. A meeting summary is available on the project website. In December 2023, CDOT hosted community "listening sessions" to gather feedback from area residents. The listening sessions were held at community locations in the study area; all included Spanish and English speaking staff. CDOT has also conducted numerous one-on-one meetings with stakeholders.

1.6.2 Ongoing Outreach

The Lead Agencies are planning an extensive outreach program for the EIS including enhanced outreach to disproportionately impacted communities, as detailed in the Public Involvement Plan. Outreach is expected to employ various methods, such as public meetings, bus tours, stakeholder meetings, elected official meetings, and agency meetings. The agencies also plan to host and attend community events and hold agency coordination meetings to develop community alliances and agency partnerships to share information and gather feedback. Information will be shared through many channels, such as in-person meetings, online meetings, telephone town halls, and other website, email, and printed and video materials.