



Archaeological Resources Technical Report - I-270 Corridor Improvements Environmental Impact Statement

Federal Project No.: STU 2706-046

CDOT Project Code: 25611

Identification Number: FHWA-CO-EIS-24-001

June 2025



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Acronyms and Abbreviations

Acronym	Definition
APE	Area of Potential Effects
BNSF	BNSF Railway
CCR	Code of Colorado Regulations
CDOT	Colorado Department of Transportation
CFR	Code of Federal Regulations
Colorado Register	Colorado Register of Historic Places
CRS	Colorado Revised Statutes
EA	Environmental Assessment
EIS	Environmental Impact Statement
FHWA	Federal Highway Administration
I-25	Interstate 25
I-270	Interstate 270
I-70	Interstate 70
I-76	Interstate 76
ITS	intelligent transportation systems
mph	miles per hour
National Register	National Register of Historic Places
NEPA	National Environmental Policy Act
OAHP	Office of Archaeology and Historic Preservation (an office housed within History Colorado)
Section 106	Section 106 of the National Historic Preservation Act of 1966
SHPO	Colorado State Historic Preservation Office
UPRR	Union Pacific Railroad

1.0 Introduction

The Federal Highway Administration (FHWA) and Colorado Department of Transportation (CDOT) are preparing an Environmental Impact Statement (EIS) to evaluate potential improvements to the Interstate 270 (I-270) corridor. FHWA and CDOT are the lead agencies for this National Environmental Policy Act (NEPA) process, which was initiated in 2020, initially anticipating an Environmental Assessment (EA). Moving into 2023, CDOT determined a more detailed environmental review was needed and requested that an EIS be prepared.

This technical report evaluates and documents potential impacts to and recommended mitigation measures for archaeological resources (historic resources are considered in a separate technical report). It supports the analysis and conclusions in the EIS.

1.1 Project Description

I-270 in Colorado is a controlled-access interstate highway with two through lanes in each direction between Interstate 25 (I-25) and Interstate 70 (I-70) in central Denver and Commerce City (Figure 1). It has a posted speed limit of 55 miles per hour (mph). The project limits include the I-270 interchanges with Interstate 76 (I-76), York Street, Vasquez Boulevard, and Quebec Street. The project will tie into the I-25 and I-70 system interchanges but improvements to these interchanges are part of projects on I-25 and I-70 and will be designed and approved separately.

The 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 project needs are:

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

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

2.0 Alternatives

CDOT developed a range of potential alternatives for I-270 improvements. The alternatives ranged from no improvements to minimal infrastructure improvements without added highway capacity to alternatives that added one or two travel lanes in each direction, which could be operated as transit, general-purpose, or Express Lanes.

A two-level alternatives evaluation process was used to screen the alternatives based on the project's purpose and need and goal, and two build alternatives were carried forward for detailed analysis in the EIS:

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

The No Action Alternative is also fully evaluated as a baseline for comparison.

Additional information on the alternatives development and evaluation process for the build alternatives is included in the Alternatives Development Technical Report.

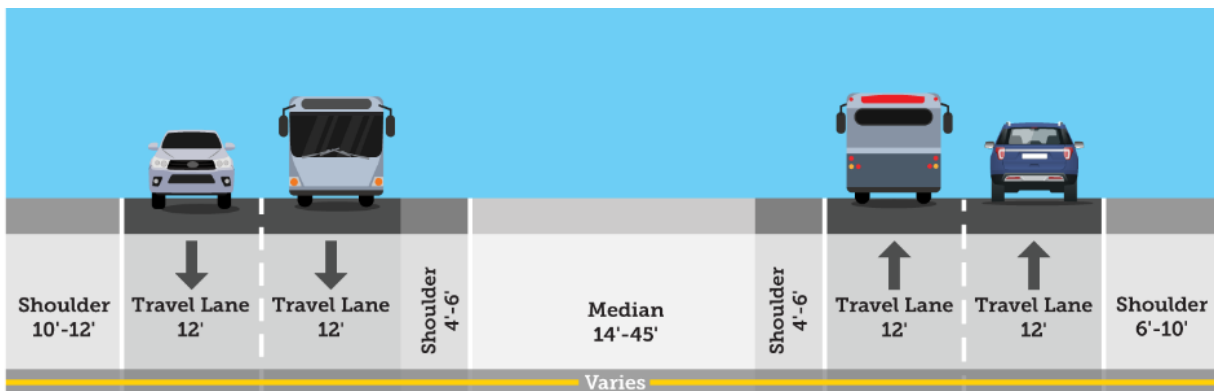
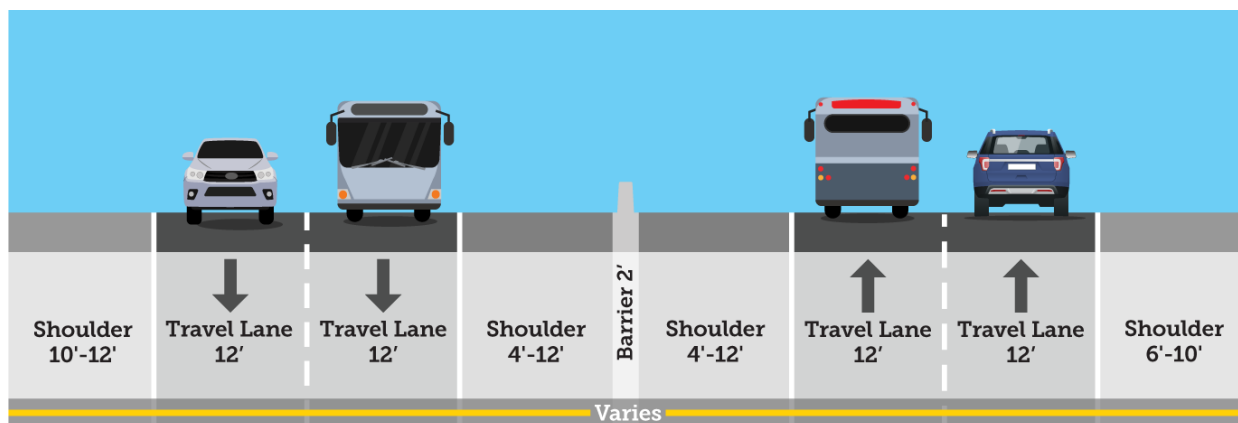
2.1 No Action Alternative

The No Action Alternative evaluates operations of I-270 if a build alternative would not occur along the corridor. It does not address the project Purpose and Need but is carried forward as a baseline for comparison. This alternative would maintain the existing highway configuration of two general-purpose travel lanes in each direction. Bridges and pavement would be maintained and repaired continuously, but underlying infrastructure deficiencies would remain.

The No Action Alternative would include substantial ongoing maintenance and the rehabilitation of 19 existing structures, including seven locations that have structures that are or will be reaching the end of their useful life. The age of the structure, recent bridge inspections, and current ongoing maintenance costs, both planned and emergency maintenance, determine if a structure is or will be reaching the end of its useful life. The seven structure locations along the I-270 corridor that are or will be reaching the end of their useful life are as follows:

- Vasquez Bridge over Sand Creek (E-17-AT)
- York Street Bridge over I-270 (E-17-IC)
- I-270 over South Platte River Eastbound and Westbound Bridges (E-17-IE & E-17-ID)
- I-270 over Burlington Ditch Eastbound and Westbound Bridges (E-17-IG & E-17-IF)
- I-270 over Brighton Boulevard, Union Pacific Railroad (UPRR) and BNSF Railway (BNSF) Eastbound and Westbound Bridges (E-17-II & E-17-IH)
- I-270 over 60th Avenue & BNSF Eastbound and Westbound Bridges (E-17-IK & E-17-IJ)
- I-270 over East 56th Avenue Eastbound and Westbound (E-17-IO & E-17-IN)

The cross section would remain unchanged along I-270 under the No Action Alternative. The No Action Alternative cross sections are shown on Figure 2 and Figure 3.

Figure 2. No Action Alternative (west of Vasquez Boulevard)

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


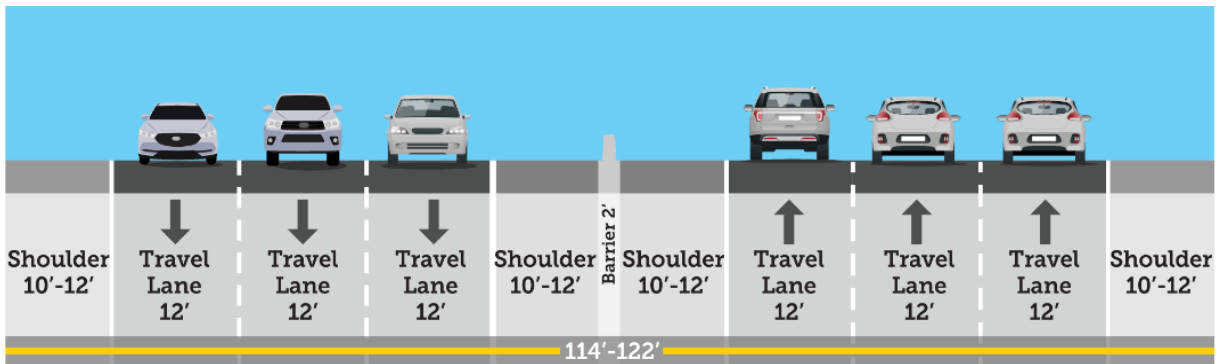
2.2 Build Alternatives

The build alternatives include improving the operational and physical conditions of the I-270 highway; reconfiguring interchanges and ramps; enhancing transit on the corridor; improving bicycle and pedestrian access across I-270; replacing deficient bridges and other infrastructure; and providing modern drainage, water quality, intelligent transportation systems (ITS), and other supporting infrastructure. Both add one new travel lane in each direction and have similar footprints, varying primarily how the additional travel operates.

2.2.1 Three General-Purpose Lanes Alternative

This alternative would reconstruct I-270 to provide three general-purpose lanes in each direction as shown in Figure 4.

Figure 4. Three General-Purpose Lanes Alternative



This alternative includes:

Mainline Improvements

- Providing three general-purpose lanes in each direction
- Widening shoulders to meet current standards
- Restriping of the westbound I-270 to northbound I-25 off-ramp to provide dual-exit lane capacity
- Adding emergency turnouts and turnaround.
- Adding one continuous auxiliary lane in each direction between the I-76 and Vasquez Boulevard on-ramps and off-ramps

Interchange Improvements

- Adding an eastbound collector ramp to consolidate incoming movements from the I-76 on-ramps
- Separating the westbound I-270 York Street and I-76 off-ramps
- Improving the Vasquez Boulevard interchange design with improved westbound on-ramp acceleration lanes and the eastbound off-ramp deceleration lanes
- Improving the Quebec Street interchange ramp acceleration and deceleration lengths

Bridge Improvements

- Reconstructing bridges that are at, or will be reaching, the end of their useful life. Bridges carrying travel lanes on I-270 include widening to accommodate additional lanes
 - Replacing the existing York Street bridge over I-270 to meet current bridge standards, accommodate an additional travel lane in each direction on York Street, include a 10-foot multi-use path and a 5-foot sidewalk, and enhance lighting
 - Replacing the existing I-270 bridges over the South Platte River Trail to meet current bridge standards, accommodate this project's bicycle and pedestrian improvements on the South Platte River Trail, and enhance lighting
 - Replacing the existing I-270 bridges over the Burlington Ditch to meet current bridge standards, accommodate future bicycle and pedestrian improvements, and enhance lighting
 - Replacing the existing I-270 bridges over Brighton Boulevard to meet current bridge standards, accommodate this project's bicycle and pedestrian improvements on

- Brighton Boulevard and future bicycle and pedestrian improvements by others, and enhance lighting
- Replacing the existing I-270 bridges over East 60th Avenue and the BNSF crossing to meet current bridge standards, accommodate future bicycle and pedestrian improvements, and enhance lighting
- Replacing the existing I-270 bridges over East 56th Avenue to meet current bridge standards, accommodate this project's bicycle and pedestrian improvements, and enhance lighting
- Replacing the existing Vasquez Boulevard bridge over Sand Creek to meet current bridge standards and accommodate this project's bicycle and pedestrian improvements

Bicycle and Pedestrian Improvements

- Improving the York Street I-270 ramp terminal intersections with crosswalks, curb ramps, and pedestrian indicators at the ramp terminal traffic signals
- Adding a new 5-foot sidewalk on the west side and reconstructing a 6-foot sidewalk on the east side of Brighton Boulevard under I-270
- Reconstructing East 56th Avenue under I-270 and adding an on-street bicycle lane, a 10-foot multi-use path, and 6-foot sidewalk connecting to existing sidewalks
- Improving the intersection at East 56th Avenue and South Sandcreek Drive to include curb ramps, crosswalks, and lighting that meet current standards
- Improving the intersection at East 56th Avenue and Eudora Street to include curb ramps, crosswalks, and lighting that meet current standards
- Adding attached sidewalks on the west side of South Sandcreek Drive. The new sidewalks would be 8 feet wide from Quebec Street to East 47th Avenue Drive and 6 feet wide from East 47th Avenue Drive to East 49th Avenue, with a pedestrian crosswalk across East 47th Avenue Drive connecting the two segments
- Improving wayfinding at key locations, guiding bicyclists and pedestrians to the nearest RTD bus stops, major road connections, or distances to the next trailhead to avoid out-of-direction travel

Trail Improvements

- Reconfiguring the South Platte River Trail crossing under I-270 to improve bicycle and pedestrian visibility around tight curves and increase vertical clearance from the I-270 overpass
- Improving bicycle and pedestrian visibility on the Sand Creek Trail by straightening out tight curves, adding a center stripe, and enhancing lighting at the Vasquez Boulevard bridge over the Sand Creek Trail
- Adding a multi-use path with bicycle and pedestrian underpasses crossing under two free-flow interchange ramps on the east side of Vasquez Boulevard through the interchange with enhanced lighting
- Adding a multi-use path on the east and west sides of the Vasquez Boulevard bridge over Sand Creek, connecting users from the East 56th Avenue and Vasquez Boulevard intersection to a new connection to the Sand Creek Trail
- Adding a multi-use trail spur, connecting the proposed north-south Vasquez Boulevard multi-use trail to the East 56th Avenue and South Sandcreek Drive intersection

- Adding a multi-use path in the southeast corner of East 56th Avenue and South Sandcreek Drive
- Adding a 10-foot-wide bicycle and pedestrian overpass over I-270 and South Sandcreek Drive approximately halfway between East 56th Avenue and Quebec Street

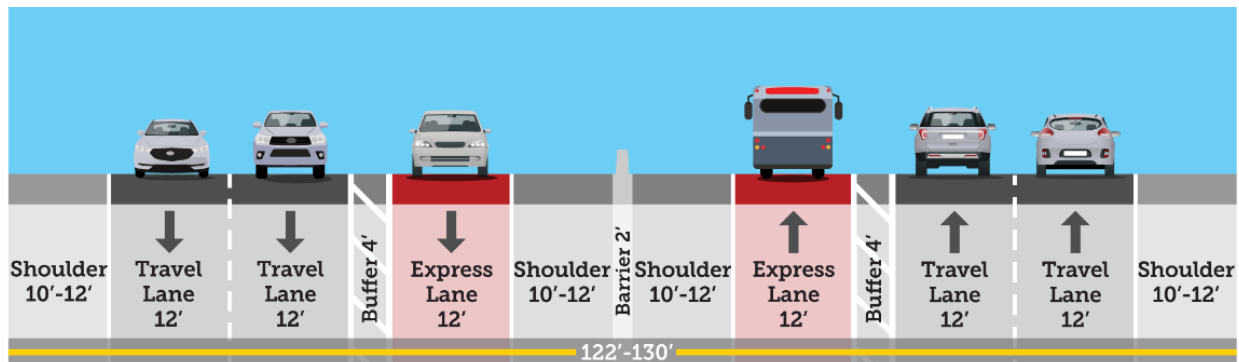
Transit Improvements

- Adding four new bus stops with connecting sidewalks and curb ramps on Quebec Street and South Sandcreek Drive near the I-270/Quebec Street interchange to improve access to RTD routes 88 and 37

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

This alternative would reconstruct I-270 with two general-purpose lanes and one Express Lane in each direction as shown in Figure 5. Transit vehicles and high-occupancy vehicles (three 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 5. Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative



This alternative includes:

Mainline Improvements

- Providing two general-purpose lanes and one Express Lane in each direction that accommodates transit
- Remainder of mainline improvements identified in the Three General-Purpose Lanes Alternative

Interchange Improvements

This alternative includes the same interchange improvements identified in the Three General-Purpose Lanes Alternative.

Bridge Improvements

This alternative includes the same bridge improvements identified in the Three General-Purpose Lanes Alternative.

Bicycle, Pedestrian, Trail, and Transit Improvements

This alternative includes the same bicycle, pedestrian, trail, and transit enhancements identified in the Three General-Purpose Lanes Alternative.

3.0 Regulatory Context

Historic properties include buildings, sites (including archaeological sites), structures, objects and districts that are eligible for listing in, or are listed in the National Register of Historic Places (National Register). Archaeological resources are considered in this technical report, while remaining historic resources are evaluated in a separate technical report. Relevant federal and state regulations and guidance for historic properties, which include archaeological sites, include:

- **Section 106 of the National Historic Preservation Act of 1966 (Section 106) (36 Code of Federal Regulations [CFR] §800)** – Federal agencies, such as FHWA, are required to evaluate effects of planned undertakings, or projects, on historic properties (i.e., National Register eligible/listed properties). To meet obligations of Section 106, the federal agency must consult with the Colorado State Historic Preservation Office (SHPO) and other consulting parties to identify historic properties in the area where the undertaking could have effects, assesses effects of the undertaking on historic properties, and explores alternatives to avoid, minimize, or mitigate adverse effects. In Colorado, CDOT typically completes the Section 106 process on behalf of FHWA. In 2014, CDOT was a signatory to the “Programmatic Agreement Among the FHWA, the Advisory Council on Historic Preservation, the SHPO, and CDOT Regarding Compliance with Section 106 of the National Historic Preservation Act...” (2014 Programmatic Agreement), which provides specific guidance for carrying out the Section 106 process for projects with FHWA’s involvement.
- **Colorado State Register Act (Colorado Revised Statutes [CRS] §24-80.1 and 8 Code of Colorado Regulations [CCR] §1504)** – At the earliest stage of planning a proposed action, the applicable stage agency (including CDOT) shall identify properties within the area of the proposed action 50 years of age or more that may have historical significance. Properties with historical significance are those that are either eligible for or listed in the National Register or the Colorado Register of Historic Places (Colorado Register). Similar to the Section 106 process, CDOT makes eligibility and effect determinations and requests concurrence from the SHPO. For purposes of this technical report, properties determined National Register eligible are assumed to be State Register eligible, and properties determined National Register not eligible are assumed to be State Register not eligible,

unless indicated otherwise. Typically, compliance with the federal Section 106 process implies compliance with the Colorado State Register Act.

4.0 Methods

The study area, or Area of Potential Effects (APE), for archaeological resources is the geographic area within which an undertaking or project may directly or indirectly cause alterations in the character or use of historic properties (36 CFR §800.4 and 36 CFR §800.16). The APE is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking. The APE for this EIS covers the entire 6.5-mile study corridor of I-270, incorporating properties that may be subject to direct or indirect effects caused by proposed transportation improvements. The APE encompasses the following: the footprint of the build alternatives, including anticipated rights-of-way and easements and anticipated locations of planned embankments, noise walls, retaining walls, barriers, water quality sites, and staging areas. See Figure 1 of Attachment A for the APE.

Substantial efforts to identify and evaluate the historic significance of archaeological historic properties occurred in 2019-2021, including an archaeological survey and assessment of the study corridor conducted on behalf of CDOT (Attachment A). This report includes a detailed methodology, a general land use history, and a file search of Office of Archaeology and Historic Preservation (OAHP) records and literature review of information on previously conducted archaeological surveys and previously recorded archaeological sites. The report also documents the results of a pedestrian archaeological survey and subsurface exploratory testing of areas within the APE considered to have the potential for intact subsurface cultural deposits.

Tribal consultation was initiated by FHWA in September 2020 to solicit participation from tribes with a historical or cultural interest in the project location. As documented in Attachment C, a total of 11 tribes were contacted, and two tribes expressed interest in participating in Section 106 consultation on the I-270 project (the Pawnee Nation and the Northern Cheyenne Tribe). None of the 11 tribes contacted identified specific concerns within the APE.

In 2023, CDOT transitioned to an EIS level analysis that considered additional alternatives. Following CDOT's prior established methodology developed to identify archaeological historic properties within the I-270 APE, CDOT studied the APE and build alternatives to determine if additional archaeological survey and documentation work was necessary. As a result of this analysis and field inspection, CDOT determined no further archaeological fieldwork was necessary (at this time) based on the prior effort and extensive prior disturbance within the APE. As the project moves forward under an approved EIS and more specific construction plans and right-of-way information are developed for phased, breakout projects, an additional archaeological review and/or archaeological fieldwork may be necessary to evaluate potential effects of the undertaking on archaeological historic properties, in coordination with the SHPO and consulting tribes.

FHWA re-initiated tribal consultation in July 2023 to solicit participation once again from tribes with a historical or cultural interest in the project location. As documented in Attachment C, a total of 11 tribes were contacted, and no response was received from 9 of

the tribes. The Northern Cheyenne Tribe and Pawnee Nation responded and accepted the invitation to be Section 106 consulting parties and Participating Agencies.

5.0 Existing Conditions

The August 2020 archaeological assessment documented nine previous archaeological surveys conducted within the APE, and no previously documented archaeological sites within the APE. The assessment also documented extensive prior disturbance within the APE and identified no archaeological historic properties during the pedestrian inventory and exploratory testing of the few areas considered to have the potential for subsurface archaeological deposits. In 2024, the CDOT Archaeologist conducted a subsequent desktop and field review of the APE and confirmed these findings.

6.0 Impacts Assessment

CDOT assessed the project's potential for adverse effects on archaeological historic properties based on the build alternatives being considered. The build alternatives propose one additional eastbound and westbound I-270 traffic lane as well as additional buffer areas, widened shoulders, and bridge replacements, with proposed work primarily within existing I-270 rights-of-way and adjacent parcels. Because the archaeological assessment of the APE identified no archaeological historic properties eligible for or listed on the National Register, CDOT determined a finding of "No Historic Properties Affected" was appropriate for the undertaking in June 2021; SHPO concurred with this finding in July 2021. Section 106 correspondence is available in Attachment B. In 2024, the CDOT Archaeologist conducted a subsequent review that confirmed this finding and the SHPO concurred with that finding on December 5, 2024 (Attachment H of the Historic Resources Technical Report).

6.1 No Action Alternative

The No Action Alternative includes ongoing highway and bridge maintenance and isolated pavement reconstruction of I-270. This alternative would have no impact to archaeological historic properties.

6.2 Three General-Purpose Lanes Alternative

There are no known or anticipated archaeological historic properties within the alternative footprint. Consequently, effects to archaeological historic properties are not anticipated with any construction activities for this alternative.

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

There are no known or anticipated archaeological historic properties within the alternative footprint. Consequently, effects to archaeological historic properties are not anticipated with any construction activities for this alternative.

7.0 Mitigation Measures

Table 1 shows a summary of the impacts and mitigations for the build alternatives.

Mitigation measures are not anticipated, given that there are no archaeological historic properties in the APE. Mitigation measures are only required when there is an adverse effect to a historic property, which must be resolved per Section 106. However, if there is a discovery during construction, the CDOT Senior Archaeologist should be contacted to evaluate the discovery.

Table 1. Summary of Impacts and Mitigation - Build Alternatives

Activity Triggering Mitigation	Location of Activity	Impact	Mitigation	Responsible Branch	Timing/Phase that Mitigation will be Implemented
Post-Review Discovery during Project Construction	Project Area	Construction disturbance	If subsurface cultural materials are encountered during project construction, the CDOT Senior Archaeologist shall be contacted immediately to initiate the process for evaluating National Register eligibility and effects per 36 CFR §800.13.	CDOT Engineering and Environmental, Contractor	Construction

8.0 Required Permits and Coordination

Design changes during final design will need to be reviewed to determine if Section 106 effects have changed, and additional consultation with the SHPO is necessary. In addition, as individual construction phases of work move forward, additional evaluations will be needed to determine if effects to historic properties have changed, and whether additional Section 106 coordination and Section 4(f) evaluations are required.

9.0 References

Colorado State Register Act, CRS §24-80.1, CCR §1504 (2025).

Department of Transportation Act, 23 USC §138, 49 USC §303, 23 CFR §774 (1966).

ERO Resources Corporation. 2021. *Archaeological Assessment: Interstate 270 Corridor Improvements, Adams and Denver Counties, Colorado*. Adams and Denver Counties: ERO Resources Corporation.

Hann, J. 2021. *Archaeological Assessment: Interstate 270 Corridor Improvements, Adams and Denver Counties, Colorado*. Adams and Denver Counties: ERO Resources Corporation.

Hann, J. 2021. *Section 106 Eligibility and Effects Determinations Letter (Archaeological Resources) to Mr. Steve Turner on draft I-270 Environmental Assessment*. ERO Resources Corporation.

Hann, J. 2021. *Section 106 Eligibility and Effects Determinations Letter (Archaeological Resources) to Mr. Steve Turner on draft I-270 Environmental Assessment*. N/A: N/A.

National Historic Preservation Act of 1966, 36 CFR §800 (1966).

Norton, D. H. 2021. *Section 106 Response Letter to Jane Hann on draft I-270 Environmental Assessment Section 106 Eligibility and Effects Determinations Letter (Archaeological Resources) HC #79271*. N/A: N/A.

Attachments

CDOT is dedicated to providing an accessible experience for everyone. While we are continuously improving our standards, some complex items in this document, such as certain figures and images, are difficult to create with fully accessible parameters to all users. If you need help understanding any part of this document, we are here to assist and have resources to provide additional accessibility assistance to any requests. Please email us at CDOT_Accessibility@state.co.us to request an accommodation, and a member of our I-270 Engineering Program will schedule a time to review the content with you. To learn more about accessibility at CDOT, please visit the [Accessibility at CDOT webpage on the CDOT Website](#).

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Attachment A: Archaeological Assessment

Archaeological Assessment: Interstate 270 Corridor Improvements, Adams and Denver Counties, Colorado. Prepared by ERO Resources Corporation, Denver, on behalf of Jacobs Engineering Group, and submitted to the Colorado Department of Transportation, Region 1 (ERO Resources Corporation, January 2021)

Attachment B: Section 106 Correspondence

Section 106 Eligibility and Effects Determinations Letter (Archaeological Resources) to Mr. Steve Turner (Jane Hann, June 21, 2021)

Section 106 Response Letter to Jane Hann on Section 106 Eligibility and Effects Determinations Letter (Archaeological Resources) HC # 79271 (Dr. Holly Kathryn Norton, July 1, 2021)

Attachment C: Tribal Consultation

Sample Tribal Solicitation for Section 106 Consultation September 2020

Pawnee and Northern Cheyenne Responses October and November 2020

8/11/22 CDOT to Pawnee Nation THPO

8/11/22 CDOT to Northern Cheyenne THPO

9/6/22 Pawnee Nation THPO to CDOT/FHWA

8/17/22 Northern Cheyenne THPO to CDOT/FHWA

Tribal Solicitations and Responses for Section 106 Consultation July 2023

Attachment A. Archaeological Assessment

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Attachment B. Section 106 Consultation

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Attachment C. Tribal Consultation

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