



Social and Economic Analysis - I-270 Corridor Improvements Environmental Impact Statement

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Acronyms and Abbreviations

Acronym	Definition
2045 Plan	Commerce City 2045 Comprehensive Plan
ACS	American Community Survey
CDOT	Colorado Department of Transportation
CO	Colorado Highway
Commerce City	City of Commerce City
CSA	Community study area
Denver	City and County of Denver
DOLA	Colorado Department of Local Affairs
DOT	Department of Transportation
EIS	Environmental Impact Statement
EO	Executive Order
FHWA	Federal Highway Administration
I-25	Interstate 25
I-270	Interstate 270
I-70	Interstate 70
I-76	Interstate 76
PWQ	Permanent water quality
CMs	Control measures
RTD	Regional Transportation District
UPS	United Parcel Service
U.S.	United States
U.S.C.	United States Code
US 85	US Highway 85

1.0 Introduction

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](#).

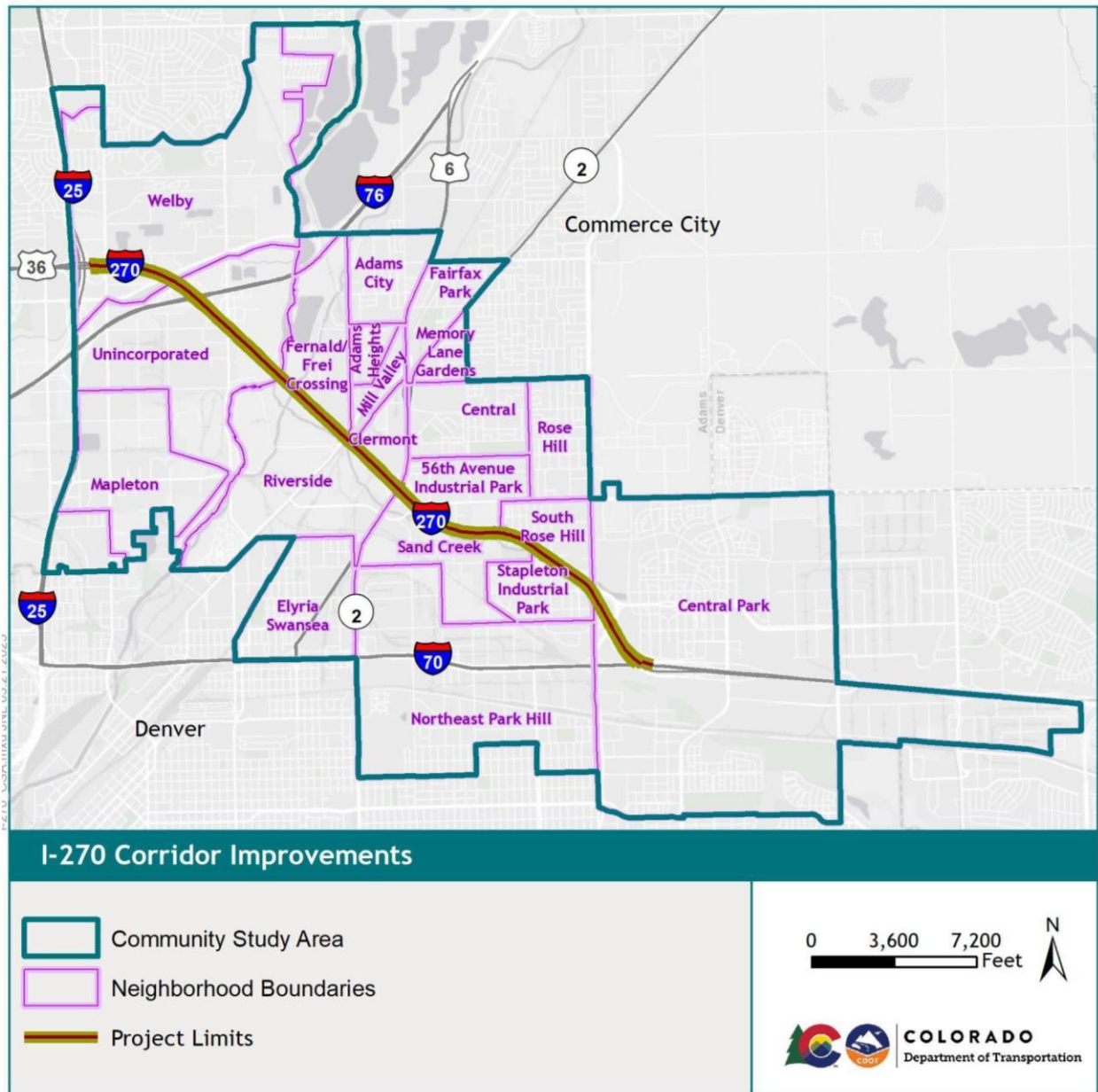
The Federal Highway Administration (FHWA) and Colorado Department of Transportation (CDOT) are preparing an Environmental Impact Statement (EIS) to evaluate potential improvements to the Interstate 270 (I-270) corridor between Interstate 25 (I-25) and Interstate 70 (I-70) in Adams County, the City and County of Denver (Denver), and the City of Commerce City (Commerce City).

Early in project development FHWA and CDOT developed a community study area (CSA) for the project. Shown in Figure 1, the CSA encompasses communities within and around the project site that could be potentially affected by project activities. This memorandum characterizes broad demographic and socioeconomic conditions within and beyond the CSA that are relevant in the context of I-270, as a regional facility that provides connections to locations within and throughout the Denver metropolitan area. It addresses large scale population, housing, development, business, employment, and freight characteristics, and trends that might influence or be influenced by the project. It also addresses how emergency services could be affected on I-270.

The analysis provided in this memorandum is supported by data and information from the following sources:

- The United States (U.S.) Census Bureau American Community Survey (ACS).
- The Colorado Department of Local Affairs (DOLA), State Demography Office.
- Adams County Regional Economic Partnership.
- CDOT's Colorado Freight Plan (CDOT, 2024c).
- Colorado Office of Economic Development and International Trade.
- Adams County, Commerce City and Denver's Comprehensive Plans (Adams County, 2022; Commerce City, 2023a; City and County of Denver, 2019).
- Stakeholder engagement and interviews with emergency service providers and businesses.

Figure 1. Community Study Area and Neighborhoods



2.0 Regulatory Context

Federal and state guidance applicable to socioeconomic analysis includes:

- CDOT's NEPA Manual (CDOT 2024a)
- CDOT's Environmental Stewardship Guide (CDOT 2024b)
- Guidance for Preparing and Processing Environmental and Section 4(f) Documents (FHWA 1987)
- 23 United States Code (USC), Section 109(h) - Federal Aid Highways
- CRS 43-1-128, *Environmental Impacts of Capacity Projects*

On January 20, 2025, President Trump signed Executive Order (EO) 14148 - Initial Rescissions of Harmful Executive Orders and Actions and EO 14154 - Unleashing American Energy. The EOs revoked EO 14096 - Revitalizing Our Nation's Commitment to Environmental Justice for All (April 21, 2023). Subsequently on January 21, 2025, President Trump signed EO 14173 - Ending Illegal Discrimination and Restoring Merit-Based Opportunity. This EO revoked EO 12898 - Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations (February 11, 1994). On February 25, 2025, CEQ published an Interim Final Rule removing the CEQ's NEPA implementing regulations, effective April 11, 2025 (90 *Federal Register* 10610). As a result of these actions, all federal environmental justice requirements are revoked and no longer apply to the federal environmental review process. FHWA, Federal Transit Administration, and Federal Railroad Administration's Joint NEPA regulations (23 CFR part 771) and the agencies' Interim Final Guidance on "Section 139 Environmental Review Process: Efficient Environmental Reviews for Project Decisionmaking and One Federal Decision" (December 17, 2024) do not require an environmental justice analysis. Accordingly, no analysis of environmental justice is included in this memorandum. Any purported environmental justice impacts will not be considered in the federal decision. Social, economic, and community impacts will continue to be disclosed where applicable in accordance with 23 CFR 771.

3.0 Population, Household, and Housing Trends

Residential neighborhoods are interspersed throughout the CSA that rely on and are affected by the interstate. The interior of the corridor and CSA is located primarily within Commerce City. The draft Commerce City 2045 Comprehensive Plan (2045 Plan) establishes thirteen distinct Character Areas that "generally describe the overall character of a place. It includes a typical land use mix, key character features, and other physical and functional elements." These areas serve as the core of the City's long-range planning efforts (Commerce City, 2023a). The 2045 Plan provides an overview and vision for each Character Area providing a current and local perspective on Commerce City's neighborhoods within the CSA. The five Character Areas that are within the CSA include:

- 270 Industrial District: This area represents Commerce City's "established heavy industrial areas" and encompasses neighborhoods adjacent to I-270 (except for South Rose Hill). 56th Avenue Industrial Park, Clermont, Mill Valley, Riverside, Sand Creek, and Stapleton Industrial Park neighborhoods are completely within this area while Adams Heights and

Fernald/Frei Crossing neighborhoods are partially within it. The 2045 Plan strives to maintain existing boundaries and prioritize opportunities to the character area from adjacent land uses buffer (by incorporating commercial or light manufacturing), especially where industrial uses abut existing residential areas.

- **Community Connection District:** This area encompasses most of Adams Heights, Adams City, and Central neighborhoods and a portion of the Fernald/Frei Crossing and Memory Lane Gardens neighborhoods and consists of all types of housing. These areas are generally located near the City's original southern core, with parks and open space, and supporting uses including retail and office typically abutting industrial, employment, and commercial areas to provide a buffer. Opportunities for new development are available around both the 72nd Street Station and the former Mile High Greyhound Park.
- **Fusion District (South Rose Hill):** South Rose Hill is an historic neighborhood surrounded by increasingly industrial areas, resulting in a mix of land uses. It includes a variety of outdoor storage uses and trucking operations, transportation-oriented commercial development such as a truck stop and fueling station, and other commercial uses interspersed with residential pockets.
- **Central Neighborhoods:** This area comprises the Rose Hill neighborhood and portions of Central, Fairfax Park, and Memory Lane Gardens. This character area includes Commerce City's original neighborhoods, nestled in the southwest portion of the Commerce City, mostly south of 80th Avenue, in the areas along both sides of Highway 2, west of the Rocky Mountain Arsenal National Wildlife Refuge. Neighborhoods are primarily single-family detached and attached homes intermixed with public uses, religious institutions, schools, and neighborhood parks. Central Neighborhoods benefit from convenient access to retail, transportation networks, and proximity to amenities such as the 72nd Avenue Regional Transportation District (RTD) Station, the Derby area, and the Rocky Mountain Arsenal National Wildlife Refuge.
- **Northern Business District:** This area encompasses relatively small portions of Adams City and Fairfax Park and consists of a wide variety of commercial service, light industrial, and business park uses. The area plays a key role in the City's employment base.

The 2045 Plan also includes a framework for the I-270 corridor that “aims to enhance the image of this area while promoting quality industrial and commercial development.” One component of the framework is preserving and reinvesting in the South Rose Hill neighborhood including enhancing public infrastructure like curb and gutter, sidewalks, crosswalks, streetlights, and integrated parks and open spaces. Industrial uses should be discouraged and phased out over time, eliminating truck activity within the residential neighborhood (Commerce City, 2023a).

The Central Park neighborhood, in the eastern portion of the CSA within Denver, is the largest neighborhood in the CSA with a population of over 30,000 individuals. This neighborhood was previously the site of the Stapleton International Airport with its origins dating back to 1929. The airport closed in the 1990s, and the area was redeveloped with construction starting in 2001.

Portions of the Elyria and Swansea and Northeast Park Hill neighborhoods within Denver occupy the southern part of the CSA. The I-270 corridor is situated north of both

neighborhoods. The Northeast Park Hill neighborhood is predominantly residential south of 38th Avenue, with single-family residences characterizing the area, while the northern portion includes more industrial and commercial development.

The portion of the Elyria and Swansea neighborhood included in the CSA had a population of approximately 3,800 in 2020. Officially designated as Globeville, and Elyria-Swansea by the city of Denver, these communities are some of the oldest in Denver. The neighborhood has a long history of industrial use.

Error! Reference source not found. presents the existing (2022) population for Adams County, Denver, and Commerce City and projected (2050) population for Adams County and Denver. Statewide population estimates are provided for context and comparison. Data from DOLA indicates that Adams County's population is projected to increase by 47.9 percent between 2022 and 2050. This is substantially higher than what is expected in Colorado (28.3 percent) and Denver (18.9 percent) during the same period.

Table 1. Existing and Projected Population Data

Area	2022	2050	Percent Change
State of Colorado	5,838,736	7,491,888	28.3
Adams County	527,501	780,081	47.9
Denver	712,637	847,915	18.9
Commerce City	63,050	---- ¹	N/A

DOLA, 2023; US Census Bureau, 2018-2022 American Community Survey 5-Year Estimates

¹DOLA does not prepare population forecast data that can be extrapolated for Commerce City.

Although population projections are not available at the city level, Commerce City comprises about a tenth of Adams County's population and is likely to reflect growth trends reported for the county.

Table 2 presents demographic characteristics for Adams County, Denver, and Commerce City. Statewide data is provided for context and comparison.

Table 2. Demographic Characteristics

Race/Ethnicity	State of Colorado	%	Adams County	%	Denver	%	Commerce City	%
Population ¹	5,770,790	NA	520,149	NA	710,800	NA	63,050	NA
Hispanic or Latino	1,273,762	22%	215,119	41%	207,519	29%	30,538	48%
White	3,821,584	66%	247,045	47%	382,813	54%	26,671	42%
Black	221,211	4%	17,428	3%	60,387	8%	2,351	4%
American Indian/ Alaska Native	24,781	<1%	1,876	<1%	2,466	<1%	132	<1%
Asian	181,338		19,984	4%	24,807	3%	1,472	2%
Native Hawaiian/Other Pacific Islander	7,230	<1%	711	<1%	783	<1%	56	<1%
Other Race	21,903	<1%	1,985	<1%	3,158	<1%	127	<1%
Two or more races	218,951	4%	16,001	3%	28,867	4%	1,703	3%

Source: U.S. Census Bureau, 2018-2022 American Community Survey 5-Year Estimates, Table B03002.

¹ Because this table reports population data from the American Community Survey the numbers vary from the projections reported from DOLA in Table 1.

I-270 runs through Commerce City southwest of the South Platte River; the northeastern portion of I-270, which runs through unincorporated Adams County, is industrial and lacks population centers. The ACS 2018-2022 five-year estimates report a total of 20,602 households in Commerce City, with an average household size of 3.04, which is slightly larger than both Adams County (2.85) and Denver (2.15). In Commerce City, approximately 28 percent of residents own their homes and 72 percent rent.

4.0 Economic Conditions

Employment and income statistics for Adams County, Denver, and Commerce City are presented in Table. Based on data from the ACS, labor force participation, employment, and unemployment rates are generally consistent between these three jurisdictions. Employment is highest in Denver (74.0 percent, compared to 68.6 percent in Adams County, and 70.1 percent in Commerce City) and unemployment is the same for all three jurisdictions (4.6 percent). Data from the ACS indicates median household incomes are highest in Commerce City. In Denver and Commerce City, 11.7 percent of individuals with a determined poverty status had incomes below the poverty level in the past 12 months—1.9 percentage points higher than the rate in Adams County (9.8 percent).

Table 3. 2019 Employment and Income Statistics

Variable	Adams County Estimate	Adams County Percent ¹	Denver Estimate	Denver Percent ¹	Commerce City Estimate	Commerce City Percent ¹
Population 16 years and over	402,806	-	591,639	-	46,216	-
In labor force	289,727	71.9	437,532	73.9	33,961	73.5
Employed	276,376	68.6	417,227	74.0	32,416	70.1
Unemployed	13,351	4.6	20,305	4.6	1,545	4.6
Not in labor force	113,079	28.1	154,107	26.1	12,255	26.5
Median household income	\$86,297	-	\$85,853	-	\$96,484	-
Income in the past 12 months below poverty level	49,625	9.6%	81,703	11.7%	7,235	11.7%

Source: US Census Bureau, 2018-2022 American Community Survey 5-Year Estimates, Table DP-03 and Table B17001.

¹Percentages in the table are derived as a percentage of the population 16 years and older.

Commerce City is home to more than 1,400 companies that employ more than 32,000 people. The transportation, warehousing, and utilities sectors are the largest employment sectors in Commerce City, as evidenced by its largest employers (see [Table 1](#)) (Commerce City, 2023b). The city's proximity to I-270, as well as other major transportation infrastructure, is one of its biggest competitive advantages in economic development (Commerce City, 2023a).

Table 4. Largest Private Employers in Commerce City, 2023

Company	Business Line	Employees
United Parcel Service (UPS)	Global Logistics	3,300
Sturgeon Electric	Electrical Service	1,700
FedEx Ground	Global Logistics	1,850
Shamrock Foods	Food Service, Distribution/Warehouse	981
FedEx Freight	Global Logistics	632
Liberty Oilfield Services	Hydraulic Fracking and Engineering Services	700
Q3 Contracting	Construction	485
Suncor Energy USA	Energy Production	500
Old Dominion Freight Line	Global Logistics	370
Hooper Corporation	Electric Utilities	310

Source: Commerce City n.d.

Major private employers near I-270 within the unincorporated Adams County and Denver Amazon Hub/Prime Now, Custom Made Meals, King Soopers Stores, the Nestle Purina Petcare Factory, the PepsiCo Bottling Plant, the National Western Complex, Union Pacific Railroad, the Home Depot, the Shops at Northfield (including Target Stores and Bass Pro) have employment centers along I-70 within the I-270 limits.

In addition to being a large employer in Commerce City, Suncor Energy USA operates the Commerce City Refinery, and it is a major economic contributor in Commerce City, Adams County, and the greater Denver metropolitan region. As Colorado's only major petroleum refinery, it processes approximately 98,000 barrels of crude oil per day. Nearly all (95 percent) of products produced by the refinery are used within the state, including 30 percent of all gasoline and 50 percent of all diesel fuel sold in Colorado, and about a third of jet fuel used at Denver International Airport. Suncor reports that annually it pays approximately \$11 million to Adams County in property taxes and \$4 million to Commerce City in sales and use taxes.

Table shows methods used by people in Adams County, Denver County, and Commerce City for commuting to work from the 2018-2022 ACS. For all three areas, most commuters drive alone. However, the highest percentage of carpoolers (10.9 percent) are in Commerce City. A smaller percentage (1.0 percent) of commuters in Commerce City use public transportation compared with Adams County (2.4 percent) and Denver County (4.9 percent). A smaller percentage of commuters walk to work in Commerce City (1.2 percent) and Adams County (1.3 percent) compared to Denver County (4.2 percent). The mean travel time to work is between approximately 25 and 30 minutes for all three geographic areas, with the highest being in Commerce City. One in 5 workers in Denver County worked from home, which is meaningfully higher than both Commerce City (12.7 percent) and Adams County (11.4 percent). For all three jurisdictions, the percentage of workers that worked from home was more than double the pre-pandemic levels.

Table 5. Commuting Practices

Commuting Practice	Adams County Estimate	Adams County Percent	Denver County Estimate	Denver County Percent	Commerce City Estimate	Commerce City Percent
Workers 16 years and over	271,582	-	409,324	-	31,993	-
Car, truck, or van - drove alone	197,983	72.9%	246,004	60.1%	23,451	73.3%
Car, truck, or van - carpooled	29,059	10.7%	27,015	6.6%	3,487	10.9%
Public transportation (excluding taxicab)	6,518	2.4%	20,057	4.9%	320	1.0%
Walked	3,531	1.3%	17,192	4.2%	384	1.2%
Biked	815	0.3%	7,777	1.9%	0	0.0%
Other means	2,987	1.1%	5,321	1.3%	288	0.9%
Worked from home	30,960	11.4%	85,549	20.9%	4,063	12.7%
Mean travel time to work (minutes)	29.9	-	25.3	-	30	-

* Sums may not total due to rounding.

Source: US Census Bureau 2022: ACS 5-Year (Table S0801)

5.0 Freight Considerations

Colorado's freight network plays a pivotal role in the state's economy, serving as a critical backbone for transportation of goods and commodities. Truck transportation is the prevailing mode for domestic freight movements in the state. I-270 is a critical part of this infrastructure, carrying a large portion of freight truck traffic and playing an outsized role in connecting the main east-west (Interstate 76 [I-76]/I-70) and north-south (I-25) freight corridors in the state. It also directly serves numerous freight companies and rail terminals in Commerce City and it is one of the only designated nuclear and hazardous materials routes through the metro area (CDOT, 2024c). How freight moves on I-270 and through the area has potential safety, travel time, economic, and environmental implications for freight industries, the surrounding community, and Colorado at large.

The current condition and persistent congestion of I-270 negatively impact freight operations in and throughout the area. Westbound I-270 from Central Park Boulevard to US Highway 85 (US 85) is the third worst truck bottleneck area in the Denver metro region, costing an average of \$175,273 in congestion costs for trucks and supply chains each day on that

segment alone (CDOT, 2024a). I-270 and surrounding highways also have higher truck-involved crash rates compared to the rest of the state, adding an additional strain to emergency response systems in the area. High freight volumes and congestion negatively impact air quality in the area and burden the community from drivers diverting onto local roads to avoid I-270 due to congestion or incidents.

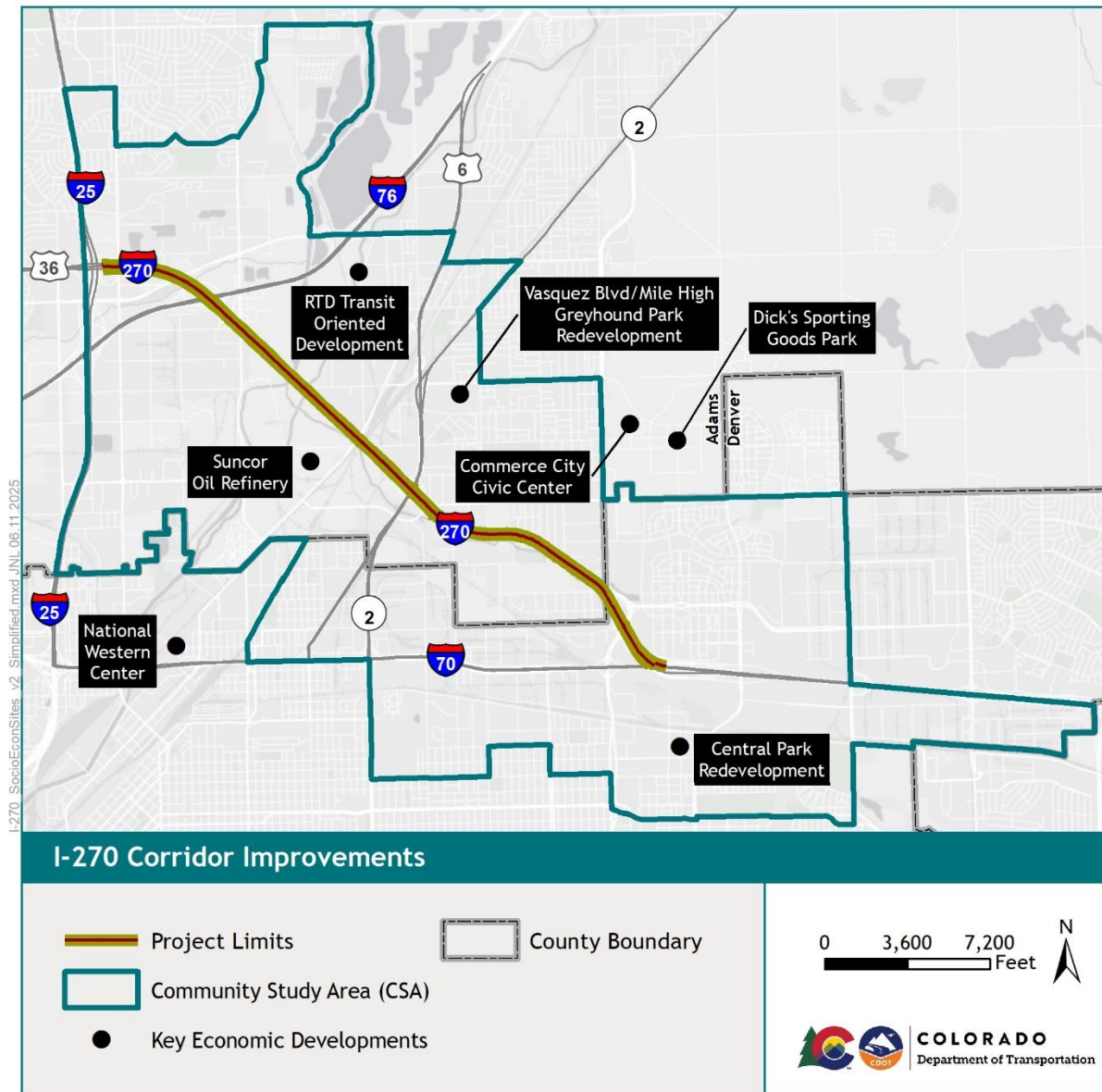
Freight operators' feedback about issues along the corridor supports the need to reduce congestion and improve travel times, reliability, and entrance and exit movements at the interchanges within the corridor. For instance, carriers located on 56th Avenue, such as UPS and Old Dominion, often use local streets, rather than the Vasquez Boulevard interchange (which is closer), to access the Quebec Street interchange because of difficulty maneuvering through the interchange. Freight carriers also noted that interchange and ramp designs, such as the intersection at 56th Avenue at Eudora Street, are challenging to navigate, poorly signed, and confusing. Adding lane capacity, lengthening and reducing curves for on-ramps and off-ramps, and exploring alternate routes for freight travel, particularly freight carrying hazardous materials, in the Denver metro area to reduce reliance on I-270 for through-freight movement are ideas that have been recommended by freight users and advocates.

6.0 Economic Growth and Development

Economic growth within Adams County is likely to occur steadily by about 8 percent annually. Commerce City considers this level of growth related to its own, as it makes up about a tenth of the County's population (Commerce City, 2023a). I-270 is a critical connection for planned developments and economic generators. Notable economic development activities relevant to the project (see Figure 2) include:

- The Mile High Greyhound Park Redevelopment at East 64th Avenue and Colorado Highway (CO) 2. A mixed-use area with residential, retail, commercial, and civic and educational spaces; creating 1,454 jobs adjacent to the I-270 and US 85 interchange, within the Adams County Enterprise Zone.
- Transit Oriented Development at the RTD North Line Station at East 72nd Avenue and Colorado Boulevard. The North Line station will provide a transit option for residents and visitors to the redeveloped Mile High Greyhound Park and mixed-use development adjacent to the station. Commerce City is improving adjacent streets in anticipation of additional vehicle traffic around the station (Commerce City, 2020).
- The National Western Center. Redevelopment of the former National Western Stock show space into a 250-acre National Western Center Campus, which will provide food, entertainment, event and education spaces, and activities. This development is just south of the Adams County Enterprise Zone, adjacent to the South Platte River.
- Central Park Redevelopment. One of the largest urban infill redevelopment projects in the country supports more than 30,000 jobs and 25,000 residents. Commercial and retail developments are likely to continue along major transportation hubs, as the community approaches buildout.

Figure 2. Key Economic Developments



7.0 Emergency Services and Response

Colorado State Patrol as well as Adams County and Denver police, sheriffs, and fire rescue provide emergency services and incident response on I-270 and adjacent areas. There are limited medical facilities and no hospitals along I-270; emergency responders transport patients to Denver or Aurora for emergency and acute care. The unpredictable nature of traffic congestion on I-270 increases safety concerns for emergency response, freight carriers, employers, manufacturers, and business interests in the region, as well as commuters and residents.

Emergency service providers have been engaged throughout project development at public open houses, stakeholder workshops, and in one-on-one discussions and ridealongs. They note that the infrastructure—narrow and inconsistent shoulder widths, limited turnaround locations, and poor pavement conditions—hampers their operations and creates safety concerns for responders. They recommended essential infrastructure upgrades, emergency turnarounds, more lanes, safer ramps, and wider shoulders to enhance safety and efficiency. Users of I-270 observe and recognize the challenges of emergency response, and improving emergency response operations has been consistently identified as one of the critical needs for the project.

8.0 Impact Considerations

Two build alternatives for I-270 improvements are being evaluated in the Draft EIS:

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

The primary difference between the two build alternatives is how the additional lane would operate (as a general-purpose lane versus an Express Lane). Both build alternatives are likely to improve travel time and reliability on I-270. The difference in operational benefits and impacts of the new Express Lanes versus general-purpose lanes cannot be fully assessed until the traffic modeling is completed. However, based on traffic data for other corridors where Express Lanes have been considered or implemented, Express Lanes will likely process a similar volume of trips, as general-purpose lanes, and travel times would be more consistent with managed Express Lanes than the unmanaged general-purpose lanes. Express Lanes provide drivers the choice of a more reliable trip by paying a toll, carpooling, or using transit. By presenting choices, Express Lanes reduce delays, help manage congestion, and keep reliable travel times for motorists using all lanes. On some Express Lanes, tolls can change in price, depending on the congestion. Toll prices are set to manage traffic and have just the right number of vehicles in the lane to provide a reliable, shorter travel time. As traffic increases, the toll price increases to ensure the lane always remains a free-flowing alternative for travelers. Conversely, the toll price will decrease when there is less traffic in the lane. By incentivizing transit and carpooling use, Express Lanes generally decrease single-occupancy vehicle use and provide more trip capacity to move more people in fewer vehicles.

A No Action Alternative (ongoing maintenance) is also being evaluated as a baseline for comparison. Additional information on the alternatives is in the *Alternatives Development Technical Report* (CDOT, 2025).

8.1 No Action Alternative

In the absence of improvements, underlying infrastructure deficiencies and problems throughout the corridor would persist. The following outcomes are anticipated:

- Population would likely continue to increase as forecasted, placing additional demand on the already deficient infrastructure.
- Ongoing transportation problems would hamper planned developments, which could impede positive investments in surrounding communities.
- Deficient infrastructure and congestion would make it more difficult for employees, customers, and freight carriers to reach their destinations. Major employment/mixed-use centers north of I-270 could experience adverse impacts related to growth, if travel on I-270 continues to degrade.
- The transportation, warehousing, and utility sectors—the largest employment sectors in Commerce City—would be particularly impacted by congestion due to their reliance on the efficient movement of materials along I-270 to adjacent interstates.
- Freight transportation would continually experience adverse effects, currently described by carriers that drive the corridor. Use of local streets to avoid congestion and difficult to navigate interchanges would continue and could become exacerbated by truckers venturing further onto local roads not designed to handle such vehicles. This situation would be aggravated as companies in the area grow, or new companies are located in the area that require more freight activity and/or deliveries.
- Safety issues along the corridor would persist, with higher-than-average crashes and challenging incident management. Shoulders would remain narrow and inconsistent in locations; acceleration/deceleration lanes would remain too short for efficient entering or exiting the interstate; safety issues surrounding the Vasquez Boulevard interchange would persist; and opportunities to improve signage, add emergency turnaround areas, add lighting, or implement bicycle and pedestrian enhancements would be lost. In addition, by not addressing the existing safety issues, incidents on I-270 would likely increase along with the increase in traffic, additionally straining emergency service personnel.

In addition, by not fixing transportation problems, the No Action Alternative would not achieve potential regional economic benefits with improving I-270 and would not support industry, freight, employment, and community development plans.

8.2 Build Alternatives

In accordance with 23 USC Section 109(h), resource specific analyses were reviewed and evaluated for impacts with social and economic considerations. The results are summarized below. Details are available in the resource specific technical memoranda, included in the Draft EIS in Attachment E.

8.2.1.1 Air, Noise, and Water - 23 USC Section 109(h)(1)

The air quality analysis performed for the project found that emissions of air pollutants regulated under the Federal Clean Air Act are generally projected to decrease by 2050, driven by stricter emissions standards, improved fuel efficiency, vehicle fleet turnover, and vehicles with internal combustion engines. However, there would be slight increases in particulate matter 10 microns or less in size (PM₁₀) compared to the No Action Alternative due to factors such as road dust and higher traffic volumes. Construction of the project would result in short-term, temporary air quality impacts from equipment emissions and fugitive dust. To minimize these effects, the project will comply with state regulations and CDOT's Standard Specifications. Contractors will be required to take measures such as obtaining necessary permits, monitoring air quality, implementing dust control plans, and ensuring compliance with applicable reporting and regulatory requirements. CDOT will implement additional measures and provide public alerts if monitoring finds air emissions exceed Clean Air Act National Ambient Air Quality Standards (NAAQS) levels. These measures will help minimize air quality impacts during construction and are detailed in the Draft EIS in Chapter 5.0 (Summary of Impacts and Mitigation - Preferred Alternative) under Air Quality.

The traffic noise analysis performed for the project found that some locations already experience traffic noise above noise abatement criteria, and that noise will remain high in the future, especially in areas close to the highway. Both Build Alternatives would impact 38 noise-sensitive locations, including 22 residences, but no area is expected to experience a substantial increase in noise compared to today. CDOT also studied whether noise barriers (walls) could help reduce noise. A noise wall is proposed in the South Rose Hill neighborhood, north of I-270. This wall would help reduce traffic noise by at least 5 decibels for nearby homes. This wall would be built as part of the project if, through a survey of those that would benefit from the wall, the majority of respondents want the wall.

During construction, there will be temporary noise from equipment and trucks. To reduce those impacts, contractors will be required to follow noise control measures, follow all applicable construction noise laws, and use best practices to limit construction-related noise wherever possible. Mitigation for noise impacts are detailed in the Draft EIS in Chapter 5.0 (Summary of Impacts and Mitigation - Preferred Alternative) under Noise.

The Build Alternatives would improve water quality conditions in the CSA through modernization of the corridor's drainage infrastructure and addition of permanent water quality (PWQ) control measures (CMs) in accordance with CDOT's PWQ program requirements.

8.2.1.2 Natural Resources, Aesthetic Values, Community Cohesion, and the Availability of Public Facilities and Services - 23 USC Section 109(h)(2)

Natural areas within the CSA contribute to local aesthetic and scenic values, and support biodiversity that residents value for educational, cultural, or ecological reasons. The project would impact prairie, grassland, and other natural areas by converting them to paved surfaces, resulting in the loss of habitat for wildlife. Riparian vegetation along Clear Creek, Sand Creek, and the South Platte River may also be permanently altered due to infrastructure expansion. The project includes a range of mitigation measures to reduce and offset these impacts, which are detailed in the Draft EIS in Chapter 5.0 (Summary of Impacts and

Mitigation - Preferred Alternative) under Biological Resources. Examples include restoration of riparian and wetland areas, revegetation using native plant species, noxious weed management, and improved drainage systems and permanent water quality treatments to reduce stormwater runoff into adjacent water bodies, which will benefit nearby streams and wildlife habitats.

Both Build Alternatives would result in visual changes to the I-270 corridor, including a wider footprint and the addition of new infrastructure features. While these changes would alter the current view, they would remain generally compatible with the existing visual character, using similar lines, colors, and textures for the new infrastructure, such as retaining walls. Temporary construction-related impacts, such as staging areas and equipment, would also affect visual conditions during the construction period. I-270 Corridor Design Guidelines will be developed prior to final design. These guidelines will ensure cohesive and context-sensitive design, drawing from best practices used on nearby corridors, such as I-70, I-25, US 36, and I-76, as well as the incorporation of input from public and local organizations on design preferences, landscaping, and other opportunities to enhance visual conditions, such as bridges, retaining walls, and the noise wall if built. Landscaping, aesthetic treatments, and consistent design elements will be used to create a more attractive and unified corridor.

The project is not anticipated to adversely affect community cohesion. The highway widening would occur within an existing transportation corridor in a highly developed urban area, where land use patterns and neighborhood boundaries are well established. The project does not involve the displacement of residents, division of neighborhoods, or removal of community gathering spaces. The Build Alternatives include important improvements in bicycle and pedestrian access, lighting, and connectivity along the South Platte River Trail and the Sand Creek Trail, valued community resources. Access between communities would be maintained or improved through updated infrastructure, and no substantial changes to local circulation patterns or connectivity are expected. As such, the project is not expected to disrupt social networks, community identity, or the ability of residents to interact and engage with one another.

Safety improvements would respond to critical needs identified by emergency response providers, including widening shoulders, increasing acceleration/deceleration lanes, redesigning the Vasquez Boulevard interchange, improving signage, and adding emergency turnaround areas. With better roadway and traffic conditions, emergency responders would be able to more safely and efficiently respond to incidents. Although I-270 will remain open, emergency responders and residents would be adversely affected by detours and traffic delays during construction.

8.2.1.3 Employment Effects, Tax, and Property Values - 23 USC Section 109(h)(3)

The project is expected to foster economic growth and investment by improving travel time, reliability, and safety for employees traveling to jobs, customers accessing businesses, and freight carriers. The transportation, warehousing, and utility sector—the largest employer in Commerce City—relies heavily on the efficient movement of materials along I-270 to adjacent interstates, including I-25, I-70, and I-76, as well as major roads, such as Vasquez Boulevard, and would benefit from the improvements proposed under the build alternatives. Without the

project, conditions on I-270 would continue to deteriorate, leading to longer delays, increased crashes, and negative impacts on business operations.

Some adverse impacts would be expected during construction, where lane closures, lower speed limits, and temporary reduction in lane and shoulder widths, lane shifts, changes in access, or other construction phasing and staging needs could affect the travel on the corridor. Employees and business operations would be adversely affected by detours and traffic delays during construction. Businesses may be more difficult to reach, which could result in employment and other economic losses (e.g., delays in receiving and distributing products, decrease in patronage).

Both Build Alternatives would acquire 10.57 acres of land. The conversion of this land to transportation uses is not expected to have a notable impact on community tax base. Land use within the CSA is established and property values are not expected to change because of the project.

Freight benefits from improved interchanges, improved merging, and more efficient, intra-corridor pickups and deliveries—with auxiliary lanes connecting the most frequently used areas along the corridor (i.e., I-76 and Vasquez Boulevard). Although freight can use Express Lanes, they may be disincentivized from doing so because of toll surcharges, difficulty merging and exiting between corridor destinations on the inside (right-hand) lanes and Express Lane operation in the outside (left-hand) lanes, and difficulty getting to and maintaining interstate speeds over the short, 6.5-mile corridor. Project-specific traffic modeling and simulation are necessary to fully characterize freight flow and impacts from the build alternatives.

8.2.1.4 Displacement of People, Businesses, and Farms - 23 USC Section 109(h)(4)

Neither Build Alternative would result in the displacement of any residences, businesses, or farms.

8.2.1.5 Community and Regional Growth - 23 USC Section 109(h)(5)

Investments in critical infrastructure would support the anticipated growth in Commerce City and Adams County—where the population is likely to increase by 47.9 percent by 2050. Improved infrastructure would better accommodate planned development of the area near Vasquez Boulevard and I-270 and Mile High Greyhound Park, as well as improve access to Dick's Sporting Goods Park, Commerce City Civic Center, and Rocky Mountain Arsenal National Wildlife Refuge by alleviating congestion on I-270 and improving interchanges.

By addressing transportation needs on I-270 relating to travel reliability, safety, existing infrastructure, and freight efficiency, the project would support industrial land uses with a more modern and efficient transportation system. As such, the Build Alternatives would be consistent with community goals to ensure strong industry, high quality infrastructure, and growth in employment over time.

9.0 Mitigation

The build alternatives are likely to have beneficial impacts for population, employment, and economic conditions in the project area. However, during construction, adverse effects to employment, businesses, residents, and emergency service providers are likely. The following mitigation measures in Table 6 are proposed to minimize construction-related impacts. Note that if the traffic modeling shows additional impacts to tolling or freight, additional mitigation measures may be required.

Table 6. Summary of Impacts and Mitigation - Build Alternatives

Activity Triggering Mitigation	Location of Activity	Impact	Mitigation	Responsible Branch	Timing/Phase that Mitigation will be Implemented
Lane closures and construction-related travel delays	Communities adjacent to construction areas	Employment and other economic losses due to traffic congestion and delays throughout construction.	CDOT will develop and implement a public information plan and will work with local public information officers to disseminate construction information to the traveling public, in accordance with CDOT Revised Standard Specification Section 626 - Public Information Management. Construction updates will be posted on the CDOT project website. CDOT will solicit input from Adams County, Denver, and Commerce City on the public information plan.	CDOT Engineering and Public Involvement, and Contractor	Pre-Construction, Construction
Lane closures and construction-related travel delays	Communities adjacent to construction areas	Employment and other economic losses due to traffic congestion and delays throughout construction.	Coordinate project construction, closure, and detour information with the Colorado Motor Carriers Association.	CDOT Engineering and Contractor	Pre-Construction and Construction
Lane closures and construction-related travel delays	Communities adjacent to construction areas	Employment and other economic losses due to traffic congestion and delays throughout construction.	The Contractor will notify nearby residents and businesses of upcoming construction work and detour routes, in accordance with CDOT Standard Specification Section 630.10 - Traffic Control Management.	CDOT Engineering and Contractor	Construction
Lane closures and construction-related travel delays	Communities adjacent to construction areas	Employment and other economic losses due to traffic congestion and delays	CDOT will solicit input from Adams County, Denver, and Commerce City on the traffic control plan.	CDOT Engineering and Contractor	Pre-Construction

		throughout construction			
Lane closures and construction-related travel delays	Communities adjacent to construction areas	Employment and other economic losses due to traffic congestion and delays throughout construction	CDOT will provide detailed construction and detour plans to business owners in the project area as far in advance as possible. Construction updates will be posted on the CDOT project website.	CDOT Engineering and Contractor	Pre-Construction and Construction
Lane closures and construction-related travel delays	Throughout construction areas	Increase in emergency response times throughout construction	CDOT will develop an emergency service provider coordination plan that will include procedures for notifying emergency service providers (Colorado State Patrol, sheriffs, police, fire dispatchers, ambulance providers, etc.) of closures or traffic delays and will provide a clear path through the construction zone, when needed.	CDOT Engineering, Public Information, and Traffic Management Center, and Contractor	Pre-Construction and Construction
Lane closures and construction-related travel delays	Throughout construction areas	Increase in emergency response times throughout construction	A traffic control plan will be developed for the project (CDOT Standard Specification 630.10a - Traffic Control Plan). The plan will maintain access for emergency vehicles at all times through the project area.	CDOT Engineering and Contractor	Pre-Construction and Construction

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