



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

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Acronyms and Abbreviations

Acronym	Definition
ACHP	Advisory Council on Historic Preservation
APE	Area of Potential Effects
BNSF	BNSF Railway
CCR	Code of Colorado Regulations
CDOT	Colorado Department of Transportation
CFR	Code of Federal Regulations
CRS	Colorado Revised Statutes
EA	Environmental Assessment
EIS	Environmental Impact Statement
FHWA	Federal Highway Administration
Historic Resources Report	Inventory and Determination of Effects and Historic Section 4(f) Report
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)
OWJ	Officials with Jurisdiction
Section 106	Section 106 of the National Historic Preservation Act of 1966
SHPO	Colorado State Historic Preservation Office
State Register	Colorado State Register of Historic Properties
UPRR	Union Pacific Railroad
USC	United States Code

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 historic resources (archaeological 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.

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.

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- 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 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 & I-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)

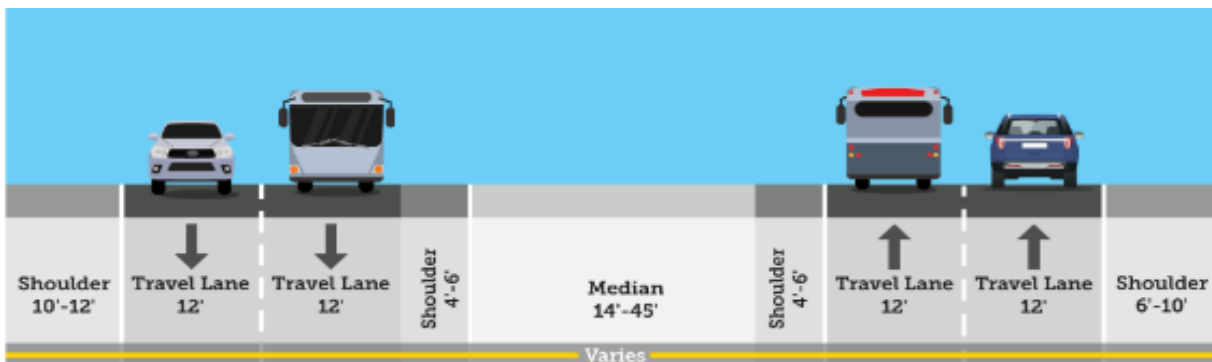
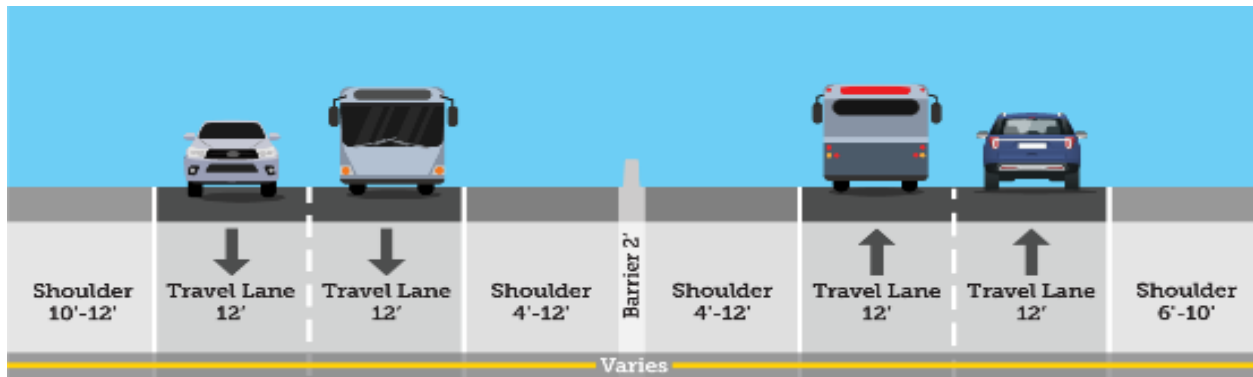


Figure 3. No Action Alternative (east of Vasquez Boulevard)



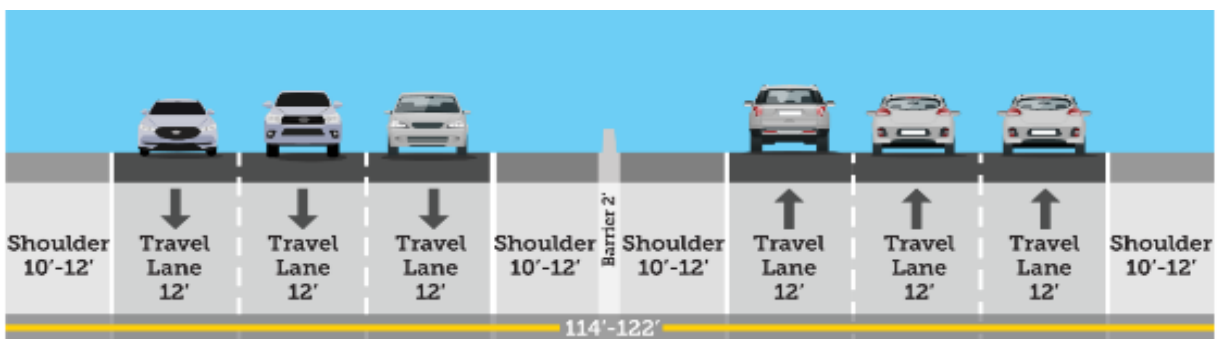
2.2 Build Alternatives

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 by 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 Regional Transportation District (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

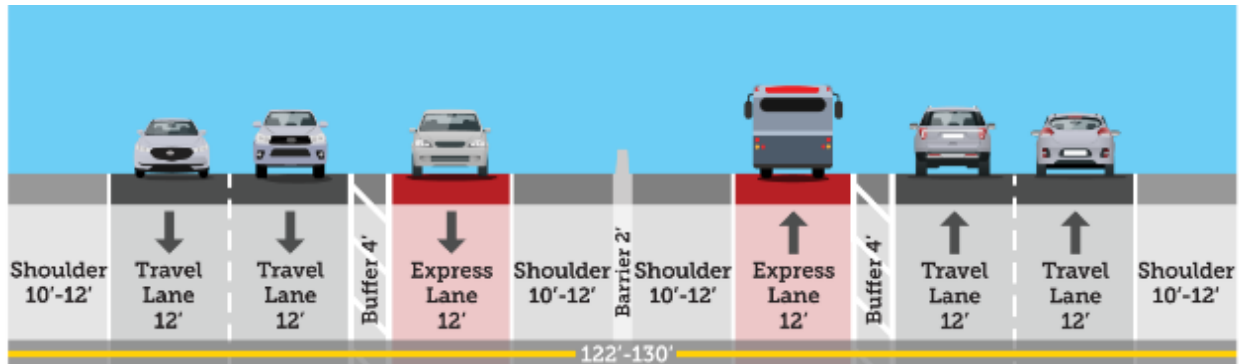
Transit Improvements

- 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
- 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, 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 evaluated in a separate technical report. The relevant federal and state regulations and guidance for historic properties 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 the effects of planned undertakings, or projects, on historic properties (i.e., National Register eligible/listed properties). To meet the obligations of Section 106, the federal agency must consult with the 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 mitigates 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 involvement. For the purposes of this report, federal funding and/or approvals are assumed, as is Section 106 compliance. The 2014 Programmatic Agreement was amended in 2024.
- **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 that may have historical significance. Properties with historical significance are those that are either eligible or listed in the National Register or the Colorado State Register of Historic Places (State Register). Similar to the Section 106 process, CDOT makes determinations of eligibility and effect and consults with SHPO, and if there are adverse effects, mitigation will be identified. For the 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

FHWA and CDOT previously proposed improvements along the I-270 corridor under an anticipated EA in 2020 and 2021. The project proposed widening shoulders and adding a travel lane, express lane, and possibly an additional auxiliary lane in each direction. In 2021, CDOT established an Area of Potential Effects (APE) for the proposed improvements; developed a historic context and detailed methodology; identified 71 properties, dating from 1976 or earlier within the APE; and evaluated significance and effects, consistent with the Section 106 process (CDOT project #23198, and History Colorado #79271). The prior Section 106 coordination, including the January 2021 *Historic Resources Inventory and Determination of Effects and Historic Section 4(f) Report (2021 Historic Resources Report)*, is provided in Attachment A. *2021 Section 106 Consultation on I-270 Draft Environmental Assessment*.

Moving into 2023, CDOT determined a more detailed environmental review was needed and requested that an EIS be prepared. The EIS examined a wider range of alternatives, including No Action Alternatives and is advancing two build alternatives, as discussed in Section 2.0, *Alternatives*. Additional Section 106 coordination is required as part of the EIS, given that several years have passed since the prior coordination occurred, a wider range of alternatives are under consideration, and the preliminary designs developed by the EIS include some

modifications and differences from the 2021 Draft EA design. Based on the alternatives and designs considered under the EIS, this Report presents an amended APE, additional identification efforts and evaluations of National Register eligibility, and updated effect determinations. A summary of these efforts are provided below. For more detailed information on the Section 106 methodology, refer to *Attachment F. Section 106 Effect Determinations for Historic Properties within the APE*.

4.1 Area of Potential Effects

Under the Section 106 process, the APE for historic properties is defined as 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 for this EIS covers the entire 6.5-mile study corridor of I-270 and adjacent properties built in 1980 or earlier that may be subject to direct or indirect effects caused by proposed transportation improvements. CDOT developed an APE in 2021 based on a single alternative. The APE defined by CDOT for this EIS includes two built alternatives, encompassing all areas covered by the 2021 APE, plus some minimal expansion areas where new project elements are anticipated under one or more of the EIS alternatives. The APE encompasses the following: the footprint of the proposed design, including the associated right-of-way of I-270; areas where water quality improvements, embankments, noise walls, retaining walls, barriers, and construction staging are anticipated; full parcels identified as noise receptors under the Traffic Noise Technical Report (CDOT 2024); full parcels where the anticipated design is outside of or on the right-of-way line; and logical segments of linear features more than 45 years of age that intersect I-270, such as roadways, railroads, and ditches. The preliminary project roadway linework for the two build alternatives and associated right-of-way requirements for these alternatives are depicted in *Attachment B*. The APE identified for this EIS is included in *Attachment C. Area of Potential Effects Maps*.

4.2 Identification of Historic Properties

CDOT, acting on behalf of FHWA, identified historic properties within the APE for the EIS, consistent with 36 CFR §800.4. After CDOT made the decision to prepare an EIS for the I-270 Corridor, CDOT historians reexamined the Section 106 efforts completed in 2021 to determine what additional identification efforts would be required. A review of the historic context included in the 2021 Historic Resources Report (included in *Attachment A. 2021 Section 106 Consultation on I-270 Draft Environmental Assessment*) proved sufficient to facilitate National Register eligibility evaluations of newly identified properties since the histories and property types of resources recorded for the EIS in 2024 are similar to those evaluated in 2021.

To transition to the EIS, CDOT performed an updated records search of the APE on August 1, 2024. This included a review of Compass, History Colorado's database of previously recorded historic sites, and other databases, such as the CDOT Historic Sites Viewer. This review revealed the 71 previously recorded properties (this count includes two linear segments of Vasquez Boulevard) previously highlighted in the 2021 Historic Resources Report (included in Appendix A), dating from 1976 or earlier, as well as three (3) previously recorded NRHP not eligible bridges inadvertently omitted from the 2021 EA effort: 5AM.2683, E-17-IN, Dahlia Street Underpass Westbound; 5AM.2691, E-17-IO, Dahlia Street Underpass Eastbound; and

5DV.10970, E-17-HD, CO-35 Bridge over Sand Creek. In terms of previously evaluated National Register eligible properties, 11 properties were identified: eight (8) linear resources, one architectural property, one railroad junction, and one industrial complex. It should be noted that the 74 previously evaluated extant properties are listed in *Attachment D. Previously Recorded Historic Properties within the APE*.

In 2023 and 2024, CDOT transitioned to an EIS-level analysis that considered additional alternatives. To that end, CDOT historians studied the APE and EIS build alternatives to determine if an additional historic property survey and documentation work were needed. As a result of this analysis, CDOT extended the cutoff age for resources to consider for National Register eligibility from 1976 to 1980; this extension was necessary to include properties 45 years of age or older, at the time that the EIS process is anticipated to be completed in 2026 and to provide a five-year construction buffer. As a result, CDOT newly surveyed five properties within the APE: (1) 5AM.4304, 6853 North York Street; (2) 5AM.4305, 7154 North Washington Street; (3) 5AM.4306, 6800 East 52nd Place; (4) 5AM.4307, 4150 East 60th Avenue; and (5) 5AM.4308, 5022 East 60th Avenue. All five properties are located on private property immediately adjacent to I-270 rights-of-way and encompass buildings, dating from 1977 to 1980. In 2024, CDOT performed historical research and evaluated these five newly identified properties using Office of Archaeology and Historic Preservation (OAHP) site forms. Summary information on these resources is included in *Attachment F. Section 106 Effect Determinations for Historic Properties within the APE*; the National Register eligibility evaluation results for these properties are also listed on *Attachment E. Historic Properties Recorded in 2024 for the EIS*.

It should be noted that CDOT's 2014 Programmatic Agreement (amended in 2024) generally allows the agencies to rely on prior eligibility determinations for properties reflected as officially not eligible/non-supporting (i.e., no additional survey or evaluation needed). The Programmatic Agreement calls for re-evaluation of properties previously determined National Register eligible or supporting (if segments of linear resources) if more than five years have passed since their last evaluation. CDOT chose not to reevaluate two previously evaluated properties that were determined individually eligible in 2021, 5AM.4047, Plastics, Inc., and 5AM.4119, Sand Creek Junction, given that they were evaluated less than five (5) years ago. In 2021 under the Draft EA and again in 2024 under the I-270 EIS, CDOT has determined one additional property "treat as eligible," 5AM.4044, Suncor Energy due to access/right-of-entry issues and/or minimal anticipated effects (i.e., property is not individually assessed on an OAHP survey form). Assuming no significant change to these three properties, CDOT plans to assume all three of these properties remain National Register eligible/treat as eligible without additional recordation through 2030.

CDOT follows History Colorado's guidance for linear resources (roads, ditches, railroads, etc.) in addition to CDOT linear resource guidance contained within CDOT's 2014 Programmatic Agreement (amended in 2024). This guidance calls for assuming the entire extent of a long linear resource, such as a road or ditch is National Register eligible, and then recording discrete logical segments of these linear resources and determining whether the studied segment is supporting or non-supporting of the linear resource's overall significance based on the integrity of the recorded segment. CDOT identified 10 segments of eight (8) linear properties in 2021. Six (6) of the recorded segments were found to be supporting of the linear resources overall assumed historical significance and four (4) were determined non-

supporting. Refer to *Attachment D. Previously Recorded Historic Properties within the APE* for additional information. CDOT decided to re-record three previously recorded linear segments: 5AM.2410.2, Brighton Boulevard; 5AM.3924.2, Vasquez Boulevard; and 5AM.465.9, Burlington Ditch on OAHP survey forms in 2024 due to major discrepancies in boundary descriptions and mapping on earlier survey forms. The supporting and non-supporting status of the recorded segments did not change as a result of the National Register eligibility evaluation results for these properties in 2024. For additional information, refer to *Attachment E. Historic Properties Recorded in 2024 for the EIS*.

4.3 Evaluation of Effects

CDOT's coordination with the SHPO and consulting parties in 2021 covered both National Register eligibility of age-eligible properties and potential project effects to historic properties, consistent with the Section 106 process. A project will have an adverse effect on a historic property per 36 CFR §800.5 if it may alter, directly or indirectly, any features that contribute to the property's eligibility for the National Register in a way that would diminish the historic integrity of the property. An adverse effect can include (but is not limited to) physical impacts to a historic property, as well as changes in the setting of a historic property, and/or the introduction of new visual, atmospheric, or audible elements that diminish the integrity of the property's significant features. If the federal agency finds that NRHP eligible properties are not present (i.e., NRHP not eligible properties) or that historic properties are present but will not be affected (at all) by proposed EIS improvements, then the agency may make a "no historic properties affected" finding. CDOT, acting on behalf of FHWA, can find that proposed EIS improvements along the I-270 corridor will also result in an "adverse effect" or "no adverse effect" finding for NRHP eligible properties. A "no adverse effect" occurs when a proposed federal undertaking may cause an affect to a NRHP eligible historic property, but these changes do not adversely affect the characteristics that qualify the property for inclusion in the NRHP.

In 2020-2021, CDOT completed an assessment of effects for properties (45 years of age or more) identified within the APE. These properties were assessed for potential effects based on the preferred alternative considered at that time, including conceptual-level project designs and available preliminary rights-of-way information. No adverse effects were found in 2021, as discussed in the 2021 Historic Resources Report included in *Attachment A. 2021 Section 106 Consultation on I-270 Draft Environmental Assessment*. In 2024, CDOT reassessed the project's effects on historic properties based on modified design information provided for the two build alternatives, including revised ramp configurations, updated bridge designs and right-of-way requirements. The updated effect findings are depicted on *Attachment F. Section 106 Effect Determinations for Historic Properties within the APE*; also refer to Section 6.0, *Section 106 Effect Determinations*.

5.0 Existing Conditions

In 1965, construction began on I-270, initially linking I-70 with I-76 through Commerce City. The section between I-70 and Vasquez Boulevard was completed in 1968-1969 and a second section between US 85 and I-76 opened in 1970. An extension of I-270 between I-76 and I-25 was completed in 2000. Sand Creek Drive was built at the same time as I-270 to serve as a

frontage road and is within the I-270 right-of-way. Sand Creek Drive and I-270 are exempt from Section 106 compliance, given that they are subject to the *Section 106 Exemption Regarding Historic Preservation Review Process for Effects to the Interstate Highway System*, adopted by the Advisory Council on Historic Preservation (ACHP) in 2005.

Numerous bridges, dating from the early construction of I-270, survive along the I-270 corridor. Eleven I-270 bridges, dating from 1968 to 1970, are in poor condition and are slated for replacement under this EIS:

- E-17-IC, 1970, a continuous steel girder underpass of I-270 at York Street
- E-17-ID and E-17-IE, 1969, prestressed concrete girder bridges I-270 over South Platte River
- E-17-IF and E-17-IG, 1969, continuous steel girder bridges I-270 over Burlington Ditch
- E-17-IH and E-17-II, 1969, continuous steel girder bridges I-270 over Brighton Boulevard, East 60th Avenue, and BNSF Railway and UPRR
- E-17-IJ and E-17-IK, 1970, continuous steel girder bridges I-270 over service road and the BNSF Railway (historic Market Street Line)
- E-17-IN and E-17-IO, 1968, continuous tee-beam concrete bridges I-270 over Dahlia Street/56th Avenue connector (previously recorded in Compass as 5AM.2683 and 5AM.2691)

Given that these 11 bridges are components of the interstate system, they are subject to the *Section 106 Exemption Regarding Historic Preservation Review Process for Effects to the Interstate Highway System*. Two of the bridges, 5AM.2683 and 5AM.2691, were previously recorded and were previously determined officially National Register not eligible, as noted above. All 11 interstate bridges slated for replacement are exempt from Section 106 review not only for their interstate associations, but also because they are common bridge types that fall under the ACHP 2012 Program Comment Issued for Streamlining Section 106 Review for Actions Affecting Post-1945 Concrete and Steel Bridges. These 11 interstate bridges, as well as other age-eligible bridges on other roadways and highways within the APE, are shown on Attachment C. Area of Potential Effects Maps. With the exception of the two (2) bridges on the interstate system that were previously recorded in Compass, the interstate system and its associated bridges are not counted as potential historic resources for the I-270 EIS and are not discussed further in this report.

For CDOT's Section 106 evaluation of the I-270 EIS, CDOT identified 78 age-eligible properties within the APE (as shown in Attachment D and Attachment E, discussed previously in this report). This includes:

- 70 previously recorded resources considered by the draft 2021 EA (for the remainder of this report, the two linear segments recorded for Vasquez Boulevard are not counted individually but are regarded as segments of a single resource, 5AM.3924, Vasquez Boulevard). Of these 70 resources, 59 were previously determined National Register not eligible, and 11 are eligible/treat as eligible.
- Three (3) bridges determined National Register not eligible under the 2014 Historic Bridge Inventory that were inadvertently omitted from the 2021 analysis (although these determinations are not reflected in History Colorado's Compass database of previously recorded sites).

- Five (5) properties within the APE, dating from 1976 to 1980, that were newly recorded and evaluated for National Register significance in 2024 (all five are not eligible).

In terms of these 78 potentially historic properties within the APE for the I-270 EIS, only 11 are National Register eligible/treat as eligible. These are the same 11 eligible properties identified in 2021 under the draft I-270 EA (refer to the 2021 Historic Resources Report in *Attachment A. 2021 Section 106 Consultation on I-270 Draft Environmental Assessment*). The 11 National Register eligible properties include eight (8) linear resources, one architectural property, one railroad junction, and one industrial complex. The 59 resources found National Register not eligible in 2021 remain not eligible in 2024, consistent with the *2014 Amended Section 106 Programmatic Agreement* discussed previously in this Report. This includes three (3) properties, dating from 1973 and 1974, that were re-confirmed *not eligible* in 2024 using OAHF Revisitation Forms. The three (3) bridges found not eligible in 2014 remain not eligible without further documentation, consistent with the *2014 Amended Section 106 Programmatic Agreement*. In all, 67 properties are not eligible to the National Register within the APE: 59 properties recorded in 2021, the three (3) bridges (discussed above), and the five (5) newly evaluated properties, dating from 1976-1980, were evaluated in 2024 using OAHF 1403 forms.

Table 1 provides a summary of the 11 National Register eligible properties in the APE. It should be noted that Suncor Energy was not surveyed due its expansive size and was *treated as eligible* for Section 106 review purposes. For more information, refer to the 2024 Historic Resources Report in *Attachment G. 2024 Section 106 Consultation for the I-270 EIS*.

Table 1. Eleven Eligible Properties Summary

Name	Site Number	Eligibility	Property Type
Plastics, Inc.	5AM.4047	Eligible	Architectural
Suncor Energy	5AM.4044	Treat as Eligible	Industrial Complex
Sand Creek (Railroad) Junction	5AM.4119	Eligible	Linear resource
Chicago, Burlington & Quincy, Brush Railroad Line	5AM.464.21	Eligible (Assumed)	Supporting of longer overall eligible linear resource
Burlington Ditch	5AM.465.9	Eligible (Assumed)	Supporting of longer overall eligible linear resource
Denver Pacific Railroad, Greeley Line	5AM.472.41	Eligible (Assumed)	Supporting of longer overall eligible linear resource
Chicago, Burlington & Quincy, Market Street Line	5AM.1298.3	Eligible (Assumed)	Supporting of longer overall eligible linear resource
Brighton Boulevard	5AM.2410.1 5AM.2410.2	Eligible (Assumed)	Supporting of longer overall eligible linear resource Supporting of longer overall eligible linear resource
Gardener's Ditch	5AM.1292.2	Eligible (Assumed)	Non-supporting of longer overall eligible linear resource
York Street	5AM.4101.2	Eligible (Assumed)	Non-supporting of longer overall eligible linear resource

Vasquez Boulevard	5AM.3924.2 5AM.3924.3	Eligible (Assumed)	Non-supporting of longer overall eligible linear resource Non-supporting of longer overall eligible linear resource
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In February 2021, CDOT coordinated the results of its Section 106 eligibility and effect findings with the SHPO and two identified Section 106 consulting parties, Commerce City and Adams County. The SHPO concurred with CDOT’s Section 106 eligibility and effect findings on March 5, 2021; no response was received from the two consulting parties. A copy of the Section 106 correspondence from 2021 is included in *Attachment A. 2021 Section 106 Consultation on I-270 Draft Environmental Assessment*.

In November 2024 after completing its assessment of the two build alternatives proposed under the I-270 EIS, CDOT submitted a revamped Section 106 submittal to the SHPO and the two Section 106 consulting parties. The SHPO concurred with CDOT’s eligibility and effect findings on December 5, 2024 (HC #79271); no response was received from the two consulting parties. A copy of the Section 106 correspondence for the I-270 EIS is located in *Attachment G. 2024 Section 106 Consultation for the I-270 EIS*.

6.0 Section 106 Effect Determinations

All 78 properties (45 years of age or more within the APE) were assessed for effects under the Section 106 process based on review of the conceptual-level project designs for the three EIS design alternatives under consideration: No Action Alternative; Three General-Purpose Lanes Alternative; and Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative. Preliminary construction and right-of-way footprints were developed for the two build options and are included as *Attachment B. Preliminary Build Alternative Footprints and Right-of-Way*. The design team for the I-270 EIS also advanced design work for new bridges proposed to carry I-270 over and/or under roads, ditches, and railroads (under the two build alternatives). The preliminary bridge design information can be found in the 2024 Historic Resources Report in *Attachment G. 2024 Section 106 Consultation for the I-270 EIS*. CDOT historians reviewed the preliminary design and right-of-way schematics, as well as the conceptual bridge designs, in order to assess effects on historic properties within the APE. CDOT’s effect determinations for all 78 age-eligible properties within the APE are summarized in the table included in *Attachment F. Section 106 Effect Determinations for Historic Properties within the APE*.

For the 67 properties within the APE determined National Register not eligible, CDOT made an effect determination of “no historic properties affected.” This determination applies to the No Action Alternative as well as the two build alternatives. These 67 properties lack significance and/or historic integrity. As such, the improvements considered under the build alternatives of the I-270 EIS have no potential to affect historic properties as it relates to these 67 properties since they are not historically significant.

The effects discussion below focuses on the 11 National Register eligible properties within the APE for the I-270 EIS. For these 11 National Register eligible properties, CDOT is required to assess effects caused by the improvements proposed by the I-270 EIS and to study the potential for these effects to “alter the characteristics of a historic property qualifying if for

inclusion in or eligibility for the National Register” (36 CFR 800.16). In compliance with the Section 106 process, CDOT must assess the conceptual project design information to determine whether improvements considered under the EIS will result in “no adverse effect” or a potential “adverse effect” to the salient, character-defining qualities of the 11 historically significant properties. After completing this analysis, CDOT concluded that the EIS alternatives result in “no adverse effect” to the 11 National Register eligible properties within the APE. A comparison of Section 106 Effects between the alternatives is provided in *Attachment F. Section 106 Effect Determinations for Historic Properties Within the Area of Potential Effects (APE)*. While the effects of the I-270 EIS on the 11 significant properties are summarized below, a more detailed analysis is provided in the 2024 Historic Resources Report found in *Attachment G. 2024 Section 106 Consultation for the I-270 EIS*.

6.1 No Action Alternative

The No Action Alternative includes ongoing highway and bridge maintenance and isolated pavement reconstruction of I-270. The 11 National Register eligible properties are the focus of the effects analysis. The maintenance and upkeep work that would occur under this alternative would have no effect on these 11 properties. This includes two privately owned historic industrial complexes located adjacent to (and not intersecting) I-270: 5AM.4047, Plastics, Inc., and 5AM.4044, Suncor Energy. Because this alternative does not change conditions or replace bridges at/over the nine historically significant ditches, roads, and railroads, the No Action Alternative also has little to no potential to affect the remaining nine linear resources and one railroad junction that intersect the existing I-270 rights-of-way. The No Action Alternative results in No Adverse Effect to the 11 National Register eligible properties.

6.2 Three General-Purpose Lanes Alternative

This alternative would reconstruct I-270 to provide three general-purpose lanes in each direction. This would involve widening the I-270 footprint, reconfiguring ramps, new right-of-way and easements, and the replacement of multiple bridge structures traversing under or over I-270. These projected effects to the 11 National Register eligible properties under this alternative are similar to those considered under the Three General-Purpose Lanes Alternative of the 2021 Draft EA. However, there are some design refinements under the EIS that require additional right-of-way and easements than under the similar Draft EA alternative. The bridge designs and/or configurations proposed for this EIS alternative are somewhat different than those considered under the 2021 Draft EA; however, no substantial permanent effects to individually eligible historic resources or supporting segments of linear resources are anticipated by the Three General Purpose Lanes Alternative of the EIS. As such, CDOT has made a “no adverse effect” determination for this EIS alternative as it relates to the 11 National Register eligible properties within the APE; because the footprint of the build alternatives are the same, the effects analysis and determinations are the same within each build alternative. A more detailed analysis of this EIS alternative as it relates to historic properties is provided in the 2024 Historic Resources Report found in *Attachment G. 2024 Section 106 Consultation for the I-270 EIS*.

A brief summary of effects to the 11 National Register eligible properties within the APE for this alternative is delineated below:

- 5AM.4047: Ramp improvements at Vasquez Boulevard are proximal to Plastics, Inc., but introduces little change to the setting of this industrial property and does not require right-of-way or easements.
- 5AM.4044: A temporary easement of 0.27 acre is required from a vacant, previously disturbed area of 5AM.4044, Suncor Energy; a vast industrial complex on the south side of I-270 that is being treated as National Register eligible for purposes of this Section 106 review.
- 5AM.1292: A non-supporting segment of the abandoned 5AM.1292.2, Gardener's Ditch, already crosses under I-270. Proposed improvements at I-270 and York Street will require two permanent easements of 0.01 acre each from this already heavily disturbed section of ditch on both the north and south sides of I-270, for a total of 0.02 acre of permanent easement.
- 5AM.4101: Minor reconfiguration of the I-270 and York Street interchange and replacement of the York Street underpass at I-270 would permanently affect approximately 2.4 acres within the existing right of way of this non-supporting segment of York Street, 5AM.4101.2. The existing York Street underpass will be replaced with a wider underpass at the same location. Approximately 0.24-mile of sidewalk and curb and gutter will be added.
- 5AM.465: Replacement of the I-270 bridge pair over a supporting segment, 5AM.465.9, of the Burlington Ditch/O'Brien Canal will require temporary easements within the historic boundary of the Canal. Five separate temporary easements are required, totaling approximately 1.17 acres. One permanent easement of 0.01 acre is required. The two new bridges will be wider than the current bridge pair but will be single-span, instead of three-span as they are currently. All permanent vertical improvements, such as bridge piers, will be located outside of the canal's historically defined boundary. No permanent change to the ditch's alignment, earthen materials, or ditch rider roads are anticipated.
- 5AM.2410: Replacement of the bridge pair carrying I-270 over two supporting segments of Brighton Boulevard/CO-265, 5AM.2410.1 and 5AM.2410.2, will affect approximately 1.5 acres within the existing right of way of the historic roadway. These effects consist largely of rebuilding the curb and gutter on either side of the roadway under the new bridges, with no widening or other improvements on Brighton Boulevard anticipated. New bridge piers will be located outside of the historically defined boundary of Brighton Boulevard, although the new bridges crossing over Brighton Boulevard will be wider than the prior bridge pair.
- 5AM.464, 5AM.472, and 5AM.4119: Three significant railroad resources in close proximity to one another: 5AM.464.21, CB&Q/BNSF-Brush Line; 5AM.472.41, DP/UP - Greeley Line; and 5AM.4119, Sand Creek Junction will all be affected by the replacement of a pair of I-270 bridges that span over them. A new four-span set of bridges will replace the existing four-span bridge pair that traverses the two supporting railroad segments and the historic railroad junction. While the new bridge pair will be wider than the current pair, all new bridge piers are located outside of the historic boundaries of these resources and in several cases new bridge piers are further removed from the historic railroad resource boundaries than the current bridges. While temporary easements will be needed to implement the bridge replacements, no permanent effects to railroad alignments, ballast, or track are anticipated. Three temporary easements are required from 5AM.464 totaling

0.15 acre; two temporary easements are required from 5AM.472 totaling 0.24 acre, and one temporary easement is required from 5AM.4119 totaling 0.05 acre.

- 5AM.1298: Replacement of the bridge pair spanning over the CB&Q Market Street Line supporting segment, 5AM.1298.3, will result in a wider bridge over the rail line, but all new bridge piers are located at least 14 feet from (outside of) the historic rail line boundary. While a temporary easement of 0.32 acre will be needed to implement the bridge replacements, no permanent effects to railroad alignments, ballast, or track are anticipated.
- 5AM.3924: Two non-supporting segments of Vasquez Boulevard/US 6, 5AM.3924.2 and 5AM.3924.3, will be affected by interchange reconstruction at I-270 and Vasquez Boulevard, including conversion of the roadway from a full cloverleaf to partial cloverleaf, on-ramp and off-ramp reconstruction, addition of a new auxiliary lane on I-270 over Vasquez Boulevard, and replacement of a non-historic bridge on Vasquez Boulevard over Sand Creek. The improvements will permanently affect nearly 9 acres of the existing right of way of Vasquez Boulevard; however, the areas where improvements are anticipated already lack historic integrity due to prior interstate construction and other recent widening and bridge replacement improvements.

6.3 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. This would involve widening the I-270 footprint, reconfiguring ramps, new right-of-way and easements, and the replacement of multiple bridge structures traversing under or over I-270. The effects to historic properties are very similar under this alternative as the Three General-Purpose Lane Alternative discussed in Section 6.2, *Three General-Purpose Lanes Alternative* above. The projected effects to the 11 National Register eligible properties under this alternative are also similar to the effects considered under the singular alternative of the Draft EA. However, there are some refined design elements that require additional right of way and easement impacts under this EIS alternative. The bridge designs and/or configurations proposed for this EIS alternative are also somewhat different than those considered under the draft 2021 EA; however, no substantial permanent effects to individually eligible historic resources or supporting segments of linear resources are anticipated by the Two General-Purpose Lanes and One Express Lane that Accommodates Transit Alternative of the EIS. As such, CDOT has made a “no adverse effect” determination for this alternative as it relates to the 11 National Register eligible properties within the APE; because the footprint of the build alternatives are the same, the effects analysis and determinations are the same within each build alternative. A more detailed analysis of this alternative as it relates to historic properties is provided in the 2024 Historic Resources Report found in *Attachment G. 2024 Section 106 Consultation for the I-270 EIS*.

A brief summary of effects to the 11 National Register eligible properties within the APE for this alternative is delineated below:

- 5AM.4047: Ramp improvements at Vasquez Boulevard are proximal to Plastics, Inc., but introduces little change to this industrial property, and does not require right-of-way or easements.

- 5AM.4044: A temporary easement of 0.27 acre is required from a vacant previously disturbed area of 5AM.4044, Suncor Energy; a vast industrial complex on the south side of I-270 that is being treated as National Register eligible for purposes of this Section 106 review.
- 5AM.1292: A non-supporting segment of the abandoned Gardener's Ditch, 5AM.1292.2, already crosses under I-270. Proposed improvements at I-270 and York Street will require two permanent easements of 0.01 acre each from this already heavily disturbed section of ditch on both the north and south sides of I-270, for a total of 0.02 acre of permanent easement.
- 5AM.4101: Minor reconfiguration of the I-270 and York Street interchange and replacement of the York Street underpass at I-270 would affect approximately 2.4 acres within the existing right of way of this non-supporting segment of York Street, 5AM.4101.2. The existing York Street underpass will be replaced with a wider underpass at the same location. Approximately 0.24-mile of sidewalk and curb and gutter will be added.
- 5AM.465: Replacement of the I-270 bridge pair over a supporting segment of the Burlington Ditch/O'Brien Canal, 5AM.465.9, will require temporary easements within the historic boundary of the Canal. The two new bridges will be wider than the current bridge pair but will be single-span, instead of three-span as they are currently. All new permanent vertical improvements, such as bridge piers, will be located outside of the canal's historically defined boundary. No permanent change to the ditch's alignment, earthen materials, or ditch rider roads are anticipated.
- 5AM.2410: Replacement of the bridge pair carrying I-270 over two supporting segments of Brighton Boulevard/CO-265, 5AM.2410.1 and 5AM.2410.2, will affect approximately 1.5 acres of the existing right of way of the historic roadway. These effects consist largely of rebuilding the curb and gutter on either side of the roadway under the new bridges, with no widening or other improvements on Brighton Boulevard anticipated. All new bridge piers will be located outside of the historically defined boundary of Brighton Boulevard, although the new bridges crossing over Brighton Boulevard will be wider than the prior bridge pair.
- 5AM.464, 5AM.472, and 5AM.4119: Three significant railroad resources in close proximity to one another: 5AM.464.21, CB&Q/BNSF-Brush Line; 5AM.472.41, DP/UP - Greeley Line; and 5AM.4119, Sand Creek Junction will all be affected by the replacement of a pair of I-270 bridges that span over them. A new four-span set of bridges will replace the existing four-span bridge pair that traverses over the two supporting railroad segments and the historic railroad junction. While the new bridge pair will be wider than the current pair, all new bridge piers will be located outside of the historic boundaries of these resources and in several cases new bridge piers are further removed from the historic railroad resource boundaries than the current bridges. While temporary easements will be needed to implement the bridge replacements, no permanent effects to railroad alignments, ballast, or track are anticipated. Three temporary easements are required from 5AM.464 totaling 0.15 acre; two temporary easements are required from 5AM.472 totaling 0.24 acre, and one temporary easement is required from 5AM.4119 totaling 0.05 acre.
- 5AM.1298: Replacement of the bridge pair spanning over the CB&Q-Market Street Line supporting segment, 5AM.1298.3, will result in a wider bridge over the rail line, but all bridge piers are located at least 14 feet from (outside of) the historic rail line boundary.

While a temporary easement of 0.32 acre will be needed to implement the bridge replacements, no permanent effects to railroad alignments, ballast, or track are anticipated.

- 5AM.3924: Two non-supporting segments of Vasquez Boulevard/US 6, 5AM.3924.2 and 5AM.3924.3, will be affected by interchange reconstruction at I-270 and Vasquez Boulevard, including conversion from a full cloverleaf to partial cloverleaf, on-ramp and off-ramp reconstruction, addition of a new auxiliary lane on I-270 over Vasquez Boulevard, and replacement of a non-historic bridge on Vasquez Boulevard over Sand Creek. The improvements will permanently affect nearly 9 acres of the existing right of way of Vasquez Boulevard; however, the areas where improvements are anticipated already lack historic integrity due to prior interstate construction and other recent widening and bridge replacement improvements.

7.0 Mitigation Measures

Based on conceptual designs developed for the two EIS build alternatives, CDOT has made a finding of “no adverse effect” for the 11 identified National Register eligible properties under the Section 106 process. CDOT will need to reassess individual project designs as they move forward under the EIS to ensure that the effects to these historic properties have not increased, and that these designs are not causing new effects to historic properties. Given that the EIS improvements will result in no adverse effect to historic properties under the Section 106 process, CDOT has not identified any mitigation required for historic resources.

8.0 Required Permits and Coordination

Under Section 106, no permits are required for historic resources. Instead, consultation with the SHPO and consulting parties is required for compliance with the Section 106 process.

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 is required.

9.0 References

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Streisfeld, Lisa. Section 106 Evaluation Letter to Ms. Dawn DiPrince on draft I-270 Environmental Impact Statement, November 26, 2024, CDOT #25611.

Attachment A. 2021 Section 106 Consultation on I-270 Draft Environmental Assessment

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Attachment B. Preliminary Build Alternative Footprints and Right-of-Way

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Attachment C. Area of Potential Effects Maps

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Attachment D. Previously Recorded Historic Properties within the APE

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Attachment E. Historic Properties Recorded in 2024 for the EIS

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Attachment F. Section 106 Effect Determinations for Historic Properties within the APE

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Attachment G. 2024 Section 106 Consultation for the I-270 EIS

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