



# I-270 Corridor Improvements Project - State Community Analysis Technical Report

CDOT Project No.: STU 2706-046

CDOT Project Code: 25611

October 2025



# Contents

|                                                                                        |                                     |
|----------------------------------------------------------------------------------------|-------------------------------------|
| <b>I-270 Corridor Improvements Project - State Community Analysis Technical Report</b> | <b>1</b>                            |
| <b>Contents</b>                                                                        | <b>i</b>                            |
| <b>Attachments</b>                                                                     | <b>Error! Bookmark not defined.</b> |
| <b>List of Acronyms and Abbreviations</b>                                              | <b>ii</b>                           |
| <b>1.0 Introduction and Regulatory Context</b>                                         | <b>1</b>                            |
| <b>2.0 Approach and Data Sources</b>                                                   | <b>2</b>                            |
| 2.1 Community Study Area                                                               | 2                                   |
| 2.2 DI Community Definition                                                            | 5                                   |
| 2.3 Identification and Characterization of DI Communities within the CSA               | 6                                   |
| <b>3.0 Environmental Burdens and Initiatives for DI Communities</b>                    | <b>1</b>                            |
| <b>4.0 Enhanced Engagement Summary</b>                                                 | <b>4</b>                            |
| 4.1 Listening Sessions                                                                 | 6                                   |
| 4.2 Stakeholder Workshops                                                              | 6                                   |
| 4.3 Community Events and Public Presence                                               | 7                                   |
| 4.4 Public Meetings                                                                    | 7                                   |
| <b>5.0 How Public Input Shaped the Project</b>                                         | <b>7</b>                            |
| 5.1 Request for a full Environmental Impact Statement (EIS)                            | 8                                   |
| 5.2 Expanded Outreach and Engagement                                                   | 8                                   |
| 5.3 Influence on Transportation Priorities and Alternatives                            | 8                                   |
| 5.4 Guidance on Environmental Analysis and Mitigation                                  | 9                                   |
| <b>6.0 Advancing Community Enhancements</b>                                            | <b>9</b>                            |
| <b>7.0 How to Stay Involved</b>                                                        | <b>9</b>                            |
| 7.1 Public hearings                                                                    | 9                                   |
| 7.2 Other Ways to Comment                                                              | 10                                  |
| <b>References</b>                                                                      | <b>10</b>                           |

## List of Acronyms and Abbreviations

| Acronym/Abbreviation | Definition                                                   |
|----------------------|--------------------------------------------------------------|
| ACS                  | American Community Survey                                    |
| BG                   | block group                                                  |
| CCND                 | Commerce City - North Denver                                 |
| CDOT                 | Colorado Department of Transportation                        |
| CDP                  | Census-designated place                                      |
| CDPHE                | Colorado Department of Public Health and Environment         |
| CEJST                | Climate and Economic Justice Screening Tool                  |
| Commerce City        | City of Commerce City                                        |
| CoPIRG               | Colorado Public Interest Research Group                      |
| CRS                  | Colorado Revised Statute                                     |
| CSA                  | Community Study Area                                         |
| Denver               | City and County of Denver                                    |
| DI                   | Disproportionately Impacted                                  |
| DOLA                 | Colorado Department of Local Affairs                         |
| EIS                  | Environmental Impact Statement                               |
| EPA                  | United States Environmental Protection Agency                |
| FHWA                 | Federal Highway Administration                               |
| FIPS                 | Federal Information Processing Series                        |
| GES                  | Globeville, Elyria- Swansea                                  |
| HB                   | House Bill                                                   |
| I-25                 | Interstate 25                                                |
| I-270                | Interstate 270                                               |
| I-70                 | Interstate 70                                                |
| I-76                 | Interstate 76                                                |
| MOU                  | Memorandum of Understanding                                  |
| NEPA                 | National Environmental Policy Act                            |
| NETC                 | Northeast Transportation Coalition                           |
| NPL                  | National Priorities List                                     |
| PIP                  | Public Involvement Plan                                      |
| PM2.5                | fine particulate matter emissions                            |
| project              | I-270 Corridor Improvements Project                          |
| RMP                  | Risk Management Plan                                         |
| RS/TC                | Regionally Significant/Transportation Capacity               |
| SB21-260             | Colorado Senate Bill 21-260                                  |
| SEPs                 | Supplemental Environmental Projects                          |
| STRAHNET             | Primary Highway Freight System and Strategic Highway Network |
| US 36                | United States Highway 36                                     |

## 1.0 Introduction and Regulatory Context

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](mailto: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 Interstate 270 (I-270) Corridor Improvements Project (project) evaluates ways to modernize I-270 to improve 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. Located in northeast City and County of Denver (Denver), unincorporated Adams County, and City of Commerce City (Commerce City), I-270 is a key segment of Colorado's transportation system and part of the Primary Highway Freight System and Strategic Highway Network (STRAHNET), a subset of the National Highway System, which provides critical connections to military installations, industries, and regional resource hubs.

The corridor currently has two through lanes in each direction, with interchanges at Interstate 76 (I-76), York Street, Vasquez Boulevard, and Quebec Street. The project extends across the full 6.5-mile corridor, from the Interstate 25 (I-25)/United States Highway 36 (US 36) interchange to Interstate 70 (I-70) (see Figure 1). Surrounding land uses include a mix of residential neighborhoods, businesses, and industrial development.

The Federal Highway Administration (FHWA) and Colorado Department of Transportation (CDOT) jointly prepared an Environmental Impact Statement (EIS) in compliance with the National Environmental Policy Act (NEPA). The EIS documents the project's purpose and need, alternatives evaluated, potential community and environmental impacts, mitigation strategies to address potential impacts, and agency and public involvement.

In addition to federal NEPA requirements, the project is also subject to state requirements under Colorado Senate Bill 21-260 (SB21-260), *The Sustainability of the Transportation System* (2021), codified as Colorado Revised Statute (CRS) 43-1-128. Because the project qualifies as a Regionally Significant/Transportation Capacity (RS/TC) project under CDOT's 2022 guidelines (CDOT, 2022) and was not exempt from the requirements under CRS 43-1-128(5), CDOT prepared a separate analysis under CRS 43-1-128.

This Technical Report documents CDOT's compliance with CRS 43-1-128 with respect to Disproportionately Impacted (DI) Communities within the Community Study Area (CSA). It outlines the tools and data sources used to define the CSA and assess community characteristics, summarizes the enhanced engagement strategies developed in coordination with CDOT's Environmental Justice and Equity Branch, and highlights key themes from

community input that shaped project decisions, including the decision to advance a full EIS process.

Section 2.0 describes the approach and data used to define the CSA and identify and characterize DI Communities. Section 3.0 summarizes environmental burdens and initiatives. Section 4.0 outlines enhanced engagement. Section 5.0 describes how public input shaped the project. Section 6.0 presents community enhancements. Section 7.0 provides information on commenting on this report and staying engaged with the project. The framework for implementing community enhancements is provided in Attachment A, and Attachment B summarizes the community-recommended actions.

Requirements under CRS 43-1-128 pertaining to air quality analysis and monitoring and greenhouse gas emissions are addressed separately in the *I-270 Corridor Improvements Project Air Quality Technical Report* and *I-270 Corridor Improvements Project Greenhouse Gas Technical Report*, respectively.

## 2.0 Approach and Data Sources

The approach and data used to define the CSA and identify DI Communities follow guidance in CDOT's NEPA Manual (CDOT, 2024a). This analysis relies primarily on demographic data from the US Census Bureau's American Community Survey (ACS) 2018-2022 5-Year Estimates.<sup>1</sup>

### 2.1 Community Study Area

The CSA includes communities located within and adjacent to the I-270 project area that could be affected by the proposed improvements. It includes Census block groups (BGs) located in Denver, unincorporated Adams County, and Commerce City. BGs—typically containing 600 to 3,000 people—are the smallest geographic entity for which ACS estimates are available. To maintain consistency, only entire Census BGs are included in the CSA, resulting in an irregularly shaped area rather than a uniform buffer.

The following considerations helped define the CSA boundary:

- **0.5-mile buffer:** The CSA includes a 0.5-mile buffer around the project limits, representing the area where impacts to the human environment are expected to be most concentrated.
- **1-mile buffer:** A 1-mile buffer was applied to capture potential effects on neighborhood cohesion.
  - The CSA extends beyond 1 mile in some areas due to the size and shape of BGs.
  - In a few cases, the 1-mile buffer intersects small portions of several BGs. Because potential effects at this distance are minor relative to areas closer to the project limits, BGs with only minor overlap were excluded from the analysis. These excluded

---

<sup>1</sup> The 2018-2022 ACS estimates align with the dataset used in the current version of EnviroScreen.

BGs include: 080010090031, 080010090032, 080010090033, 080010088023, 080019887001, 080319801001, 080310041022, and 080310035011.<sup>2</sup>

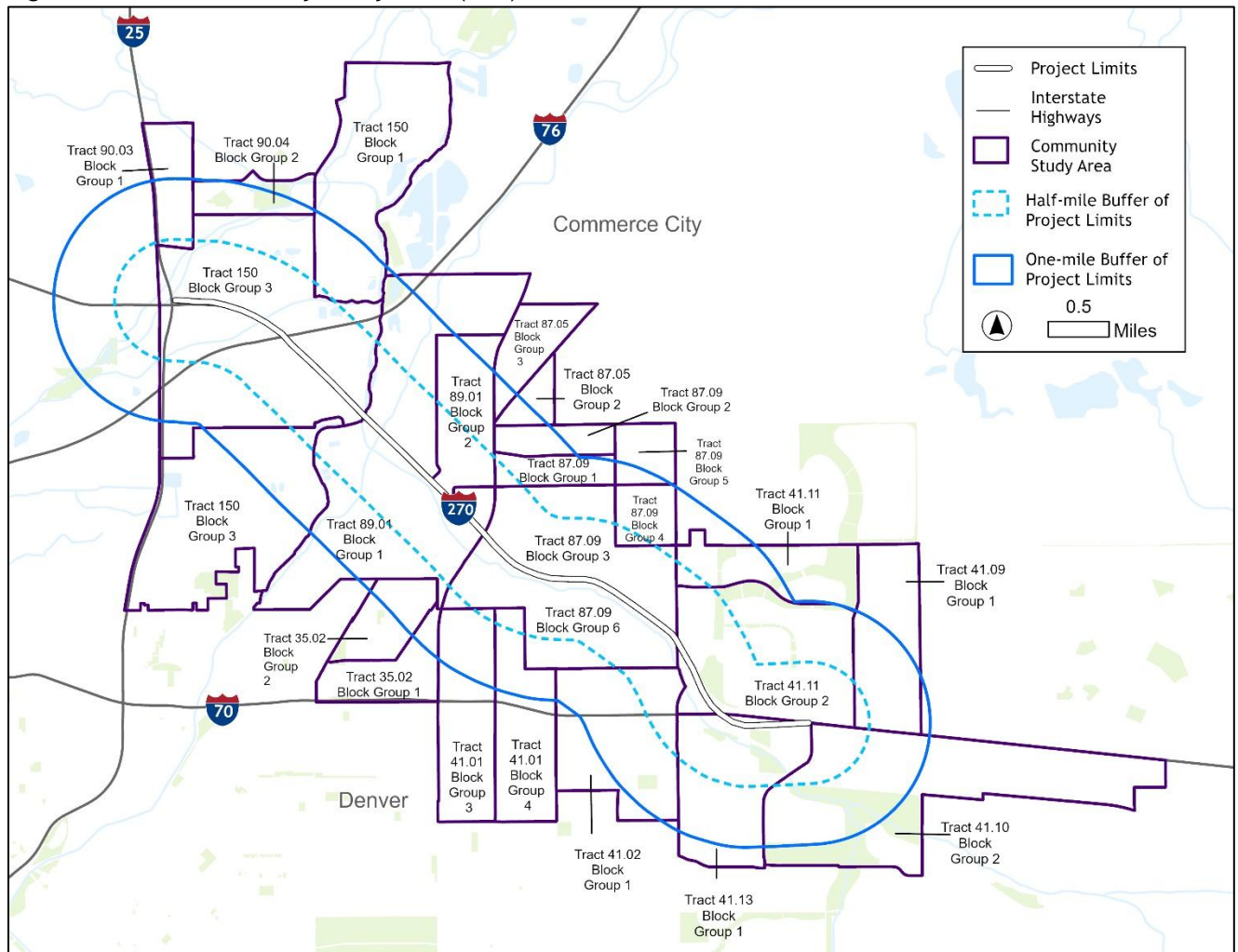
- **Western boundary:** Areas west of I-25 are not included in the CSA because they represent distinct communities that do not share a common history, identity, or development context. I-25 acts as a physical and social boundary, separating neighborhoods with different demographics, land use patterns, and community priorities.

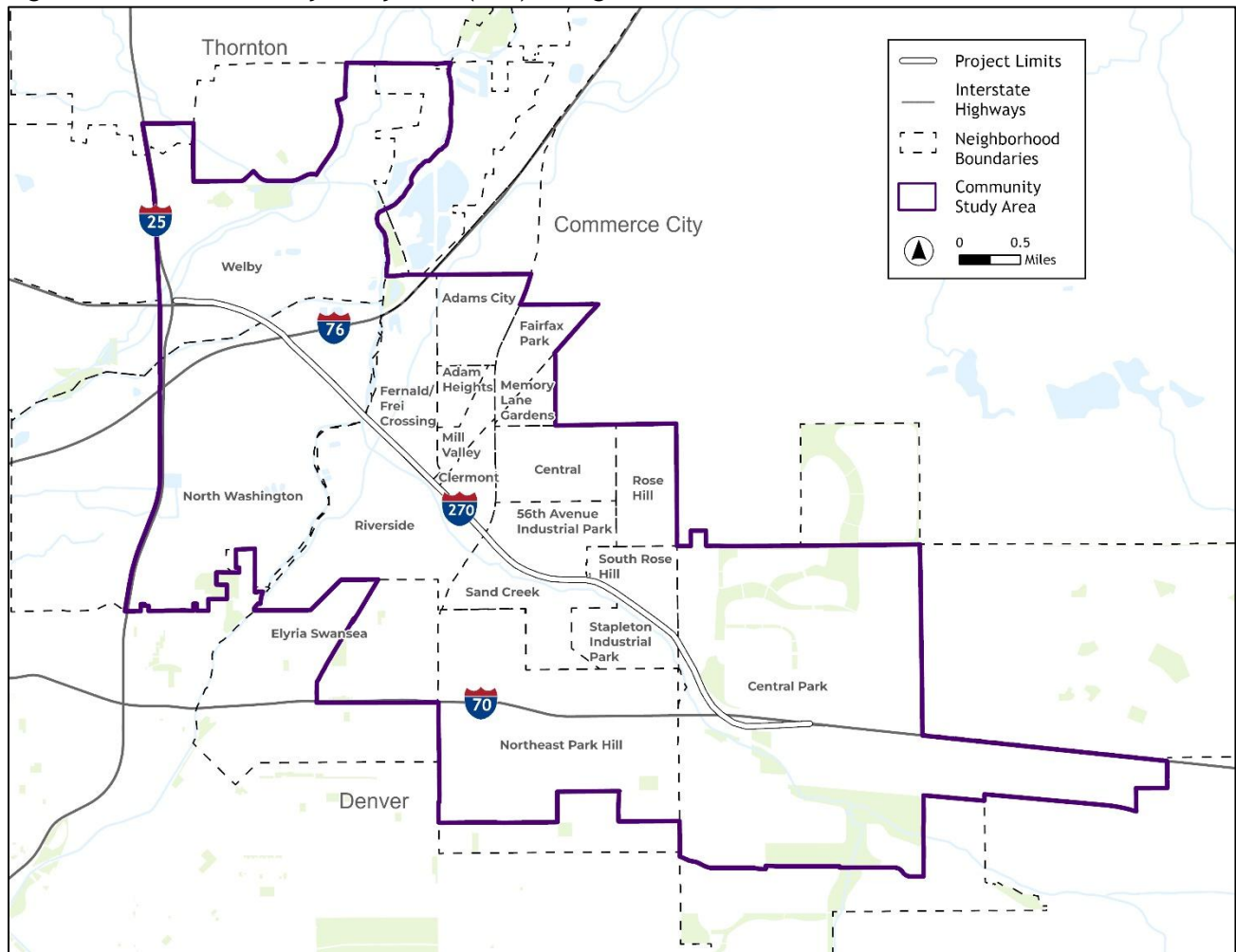
The CSA is illustrated in Figure 1 and Figure 2. Figure 1 identifies the 25 BGs that comprise the CSA and shows the 0.5-mile and 1-mile buffer areas for reference. Figure 2 depicts neighborhoods within the CSA. In some cases, neighborhood boundaries align with one or more BGs, while in others a single BG may encompass several neighborhoods or cross neighborhood boundaries. Neighborhood boundaries are based on spatial data from Denver and Commerce City; for unincorporated Adams County, boundaries follow census-designated place (CDP) definitions.

---

<sup>2</sup> These BG numbers are the unique Federal Information Processing Series (FIPS) codes for each BG. These 12-digit codes reflect the full geography, including state, county, Census Tract, and Census BG. The figures use an abbreviated nomenclature that identifies the Census Tract and BG only.

**Figure 1. Community Study Area (CSA) - BGs**



**Figure 2. Community Study Area (CSA) - Neighborhoods\***


\* Neighborhood boundaries are based on spatial data available from Denver and Commerce City. Unincorporated Adams County neighborhoods are based on CDP boundaries.

## 2.2 DI Community Definition

Following adoption of CRS 43-1-128 and the Environmental Justice Act (House Bill (HB) 21-1266), the Colorado General Assembly established the Environmental Justice Action Task Force to recommend a consistent definition of a DI Community. The legislature adopted this recommendation through HB 23-1233, *Electric Vehicle Charging and Parking Requirements*, which standardized the definition now used by all state agencies.

Under HB 23-1233, DI Communities include:

- **Low-income communities:** Census BGs where more than 40% of households are at or below 200% of the federal poverty line.
- **Communities of color:** Census BGs where more than 40% of the population identify as anything other than non-Hispanic White.
- **Housing cost-burdened communities:** Census BGs where more than 50% of households spend more than 30% of their income on housing costs like rent or mortgage payments.

- **Linguistically isolated communities:** Census BGs where more than 20% of the population live in households where all adults speak a language other than English and speak English less than very well.
- **Historically marginalized communities:** Communities with a history of environmental racism created through redlining or anti-Black, anti-Hispanic, anti-immigrant, or anti-Indigenous laws, policies, or practices that continue to experience present-day environmental health disparities.
- **Cumulatively impacted communities:** Communities where multiple factors, including socioeconomic stressors, vulnerable populations, disproportionate environmental burdens, vulnerability to environmental degradation or climate change, and lack of public participation may act cumulatively to affect health and the environment and may contribute to persistent environmental health disparities. Cumulatively impacted communities can be presumptively identified in one of two ways:
  - They are in a Census BG with a Colorado EnviroScreen score<sup>3</sup> above the 80th percentile; or,
  - They are in a Census tract that was identified as disadvantaged in the former Council on Environmental Quality's Climate and Economic Justice Screening Tool (CEJST).<sup>4</sup>
- **Tribal lands:** The Southern Ute and Ute Mountain Ute Reservations.
- **Mobile Home Communities:** Areas that meet the Colorado Department of Local Affairs' (DOLA) definition of a Mobile Home Park.<sup>5</sup>

Under HB 23-1233, a BG qualifies as a DI Community if it meets or exceeds the established threshold in one or more categories.<sup>6</sup>

The Colorado Department of Public Health and Environment (CDPHE) EnviroScreen Tool serves as the primary data source for identifying DI Communities under these definitions. This tool compiles socioeconomic and environmental data to evaluate community vulnerability and disproportionate impacts. It was used in this analysis to determine the DI Community status of Census BGs within the CSA.

## 2.3 Identification and Characterization of DI Communities within the CSA

As shown in Figure 3, 20 of the 25 BGs within the CSA meet the statutory definition of a DI Community. Table 1 presents detailed EnviroScreen results for each BG. None of the BGs within the CSA fall under tribal jurisdiction.

---

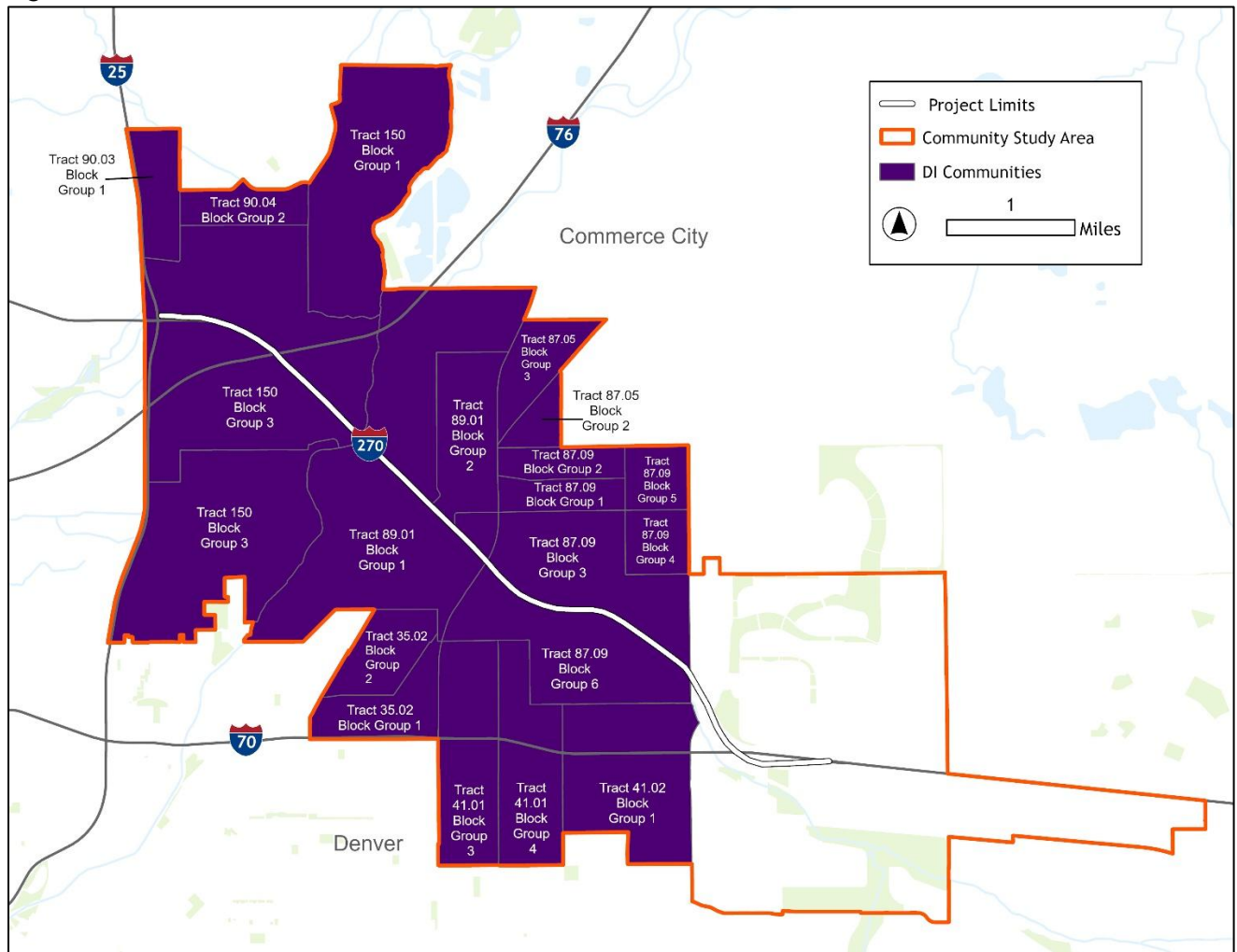
<sup>3</sup> EnviroScreen is an environmental justice mapping tool that uses population and environmental factors to calculate an EnviroScreen Score. A higher EnviroScreen Score means the area is more likely to be affected by environmental inequities. The tool includes scores for each county, Census tract, and Census BG in Colorado.

<sup>4</sup> CEJST is no longer available or suggested for use by the U.S. Council on Environmental Quality. However, the data were incorporated into CDPHE's EnviroScreen and continue to be used as one metric for identifying DI Communities.

<sup>5</sup> DOLA defines a mobile home park as a property that is used for the continuous accommodation of more than five occupied mobile homes.

<sup>6</sup> This definition of DI Communities has been codified at CRS 24-4-109(2)(b)(II).

**Figure 3. DI Communities**



**Table 1. DI Communities and EnviroScreen Scores by Census BG\***

| Census Geography  | Low Income   | People of Color | Linguistically Isolated | Housing Burdened | EnviroScreen Score (percentile) | CEJST Disadvantaged Census Tract** | Contains Mobile Home Community | DI Community |
|-------------------|--------------|-----------------|-------------------------|------------------|---------------------------------|------------------------------------|--------------------------------|--------------|
| Tract 35.02, BG 1 | Yes<br>47.1% | Yes<br>94.6%    | No<br>4.5%              | No<br>43.6%      | Yes<br>91.3                     | Yes                                | No                             | Yes          |
| Tract 35.02, BG 2 | No<br>31.4%  | Yes<br>91.9%    | Yes<br>20.0%            | No<br>27.9%      | Yes<br>88.4                     | Yes                                | Yes                            | Yes          |
| Tract 41.01, BG 3 | No<br>31.3%  | Yes<br>63.7%    | No<br>0.0%              | No<br>34.0%      | Yes<br>95.8                     | Yes                                | No                             | Yes          |
| Tract 41.01, BG 4 | No<br>21.3%  | Yes<br>82.6%    | No<br>0.2%              | No<br>41.6%      | Yes<br>82.4                     | Yes                                | No                             | Yes          |
| Tract 41.02, BG 1 | Yes<br>42.6% | Yes<br>61.1%    | No<br>8.2%              | No<br>38.1%      | Yes<br>97.5                     | Yes                                | No                             | Yes          |
| Tract 41.10 BG 2  | No<br>5.9%   | No<br>19.1%     | No<br>0%                | No<br>20.1%      | No<br>68.5                      | No                                 | No                             | No           |
| Tract 41.11 BG 1  | No<br>22.8%  | No<br>38.8%     | No<br>1.6%              | No<br>29.5%      | No<br>41.5                      | No                                 | No                             | No           |
| Tract 41.11 BG 2  | No<br>9.3%   | No<br>30.8%     | No<br>2.7%              | No<br>32.9%      | No<br>41.3                      | No                                 | No                             | No           |
| Tract 41.13 BG 1  | No<br>5.5%   | No<br>29.9%     | No<br>0.6%              | No<br>16.8%      | No<br>38.6                      | No                                 | No                             | No           |
| Tract 87.05, BG 2 | Yes<br>69.3% | Yes<br>64.0%    | Yes<br>26.2%            | No<br>16.7%      | Yes<br>96.1                     | Yes                                | Yes                            | Yes          |
| Tract 87.05, BG 3 | Yes<br>76.5% | Yes<br>95.2%    | Yes<br>34.0%            | No<br>40.7%      | Yes<br>97.5                     | Yes                                | Yes                            | Yes          |
| Tract 87.09, BG 1 | No<br>3.3%   | Yes<br>57.4%    | No<br>0.0%              | No<br>13.1%      | Yes<br>86.4                     | Yes                                | No                             | Yes          |
| Tract 87.09, BG 2 | Yes<br>63.4% | Yes<br>83.1%    | No<br>0.0%              | Yes<br>70.6%     | Yes<br>99.9                     | Yes                                | Yes                            | Yes          |
| Tract 87.09, BG 3 | Yes<br>76.4% | Yes<br>92.4%    | No<br>0.0%              | Yes<br>57.1%     | Yes<br>99.7                     | Yes                                | No                             | Yes          |
| Tract 87.09, BG 4 | No<br>34.2%  | Yes<br>96.3%    | No<br>15.6%             | No<br>45.7%      | Yes<br>99.9                     | Yes                                | No                             | Yes          |
| Tract 87.09, BG 5 | Yes<br>69.7% | Yes<br>84.4%    | No<br>17.5%             | Yes<br>50.7%     | Yes<br>99.8                     | Yes                                | No                             | Yes          |
| Tract 87.09, BG 6 | Yes<br>84.7% | Yes<br>40.1%    | No<br>0.0%              | No<br>0.0%       | Yes<br>100.0                    | Yes                                | No                             | Yes          |

| Census Geography   | Low Income   | People of Color | Linguistically Isolated | Housing Burdened | EnviroScreen Score (percentile) | CEJST Disadvantaged Census Tract** | Contains Mobile Home Community | DI Community |
|--------------------|--------------|-----------------|-------------------------|------------------|---------------------------------|------------------------------------|--------------------------------|--------------|
| Tract 89.01, BG 1  | No<br>13.0%  | Yes<br>77.7%    | No<br>5.4%              | No<br>18.5%      | Yes<br>87.6                     | Yes                                | No                             | Yes          |
| Tract 89.01, BG 2  | Yes<br>51.5% | Yes<br>79.7%    | No<br>13.5%             | No<br>27.0%      | Yes<br>97.9                     | Yes                                | No                             | Yes          |
| Tract 90.03, BG 1  | No<br>15.8%  | Yes<br>69.4%    | No<br>11.6%             | No<br>41.9%      | Yes<br>92.5                     | No                                 | No                             | Yes          |
| Tract 90.04, BG 2  | No<br>25.8%  | Yes<br>85.2%    | No<br>13.2%             | No<br>44.9%      | Yes<br>85.9                     | No                                 | No                             | Yes          |
| Tract 150.00, BG 1 | No<br>25.3%  | Yes<br>57.1%    | No<br>4.8%              | Yes<br>50.8%     | Yes<br>94.6                     | Yes                                | Yes                            | Yes          |
| Tract 150.00, BG 2 | Yes<br>45.4% | No<br>33.7%     | No<br>0.0%              | Yes<br>50.5%     | Yes<br>99.1                     | Yes                                | Yes                            | Yes          |
| Tract 150.00, BG 3 | Yes<br>65.2% | Yes<br>59.1%    | No<br>18.7%             | No<br>69.1%      | Yes<br>99.9                     | Yes                                | Yes                            | Yes          |

Source: CDPHE, 2024.

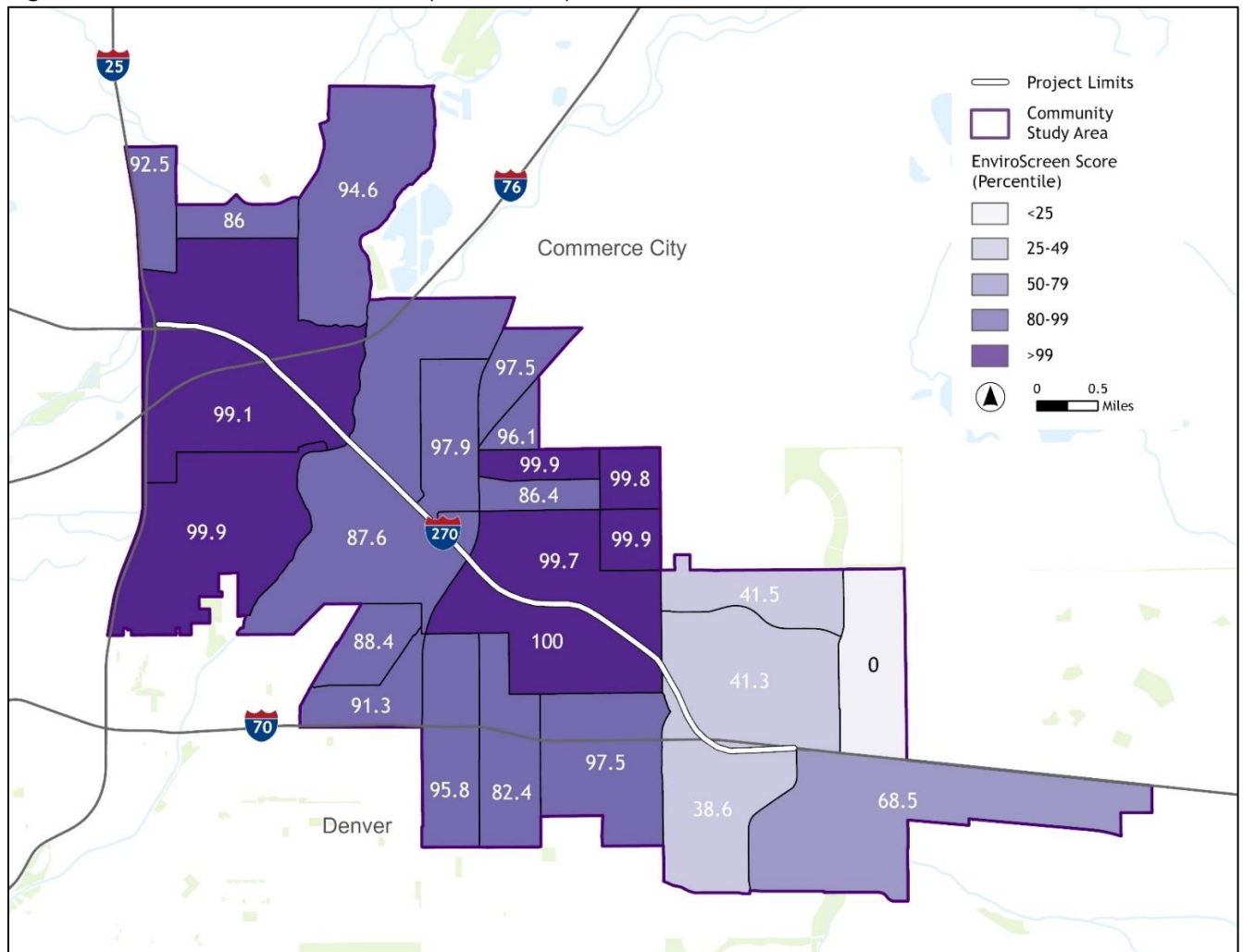
\* Tract 41.09 BG 1 is not included in the table because the 2018-2022 ACS reported that no population resided within this BG.

\*\* CEJST is no longer maintained or recommended for use by the U.S. Council on Environmental Quality. However, its data were integrated into CDPHE's EnviroScreen, where they continue to serve as one of several metrics used to identify DI Communities.

### 3.0 Environmental Burdens and Initiatives for DI Communities

Figure 4 presents the EnviroScreen scores (expressed as percentiles) for all BGs within the CSA. Each percentile indicates the proportion of Colorado's Census BGs with lower scores than the area shown. For example, a BG with an EnviroScreen score of 99 experiences greater cumulative environmental and health burdens than 99% of all BGs in the state. Scores above 80 indicate cumulatively impacted communities, and nearly all the BGs in the CSA exceed this threshold (see Table 1). With the exception of four BGs located in the Central Park neighborhood on the eastern edge of the CSA and one BG that has no residential population, the CSA includes some of the highest EnviroScreen scores in Colorado.

**Figure 4. EnviroScreen Scores (Percentiles)\***



Source: CDPHE, 2024.

\*A BG with a score of zero indicates that there is no residential population within its boundaries (according to the 2018-2022 ACS). Since EnviroScreen evaluates potential environmental and demographic burdens on communities, areas without population are not assigned a score.

The environmental burdens contributing to these high cumulative scores include:

- Environmental exposures, which refer to direct contact with harmful pollutants (such as air pollution, noise, and drinking water contaminants) that can negatively affect human health. Several indicators demonstrate elevated levels of exposure for the disproportionately impacted BGs when compared to BGs statewide. In particular:
  - Emissions of air toxics range from the 72nd to 99th percentile when compared to BGs statewide, with 14 BGs at or above the 90th percentile. These emissions include various hazardous air pollutants that may cause serious health effects.
  - Exposure to fine particulate matter emissions (PM<sub>2.5</sub>) in the CSA BGs ranges from the 88th to 99th percentile compared to BGs statewide, with 19 BGs at or above the 90th percentile. PM<sub>2.5</sub> refers to tiny inhalable particles less than 2.5 microns in diameter that can enter the lungs and bloodstream, contributing to respiratory and cardiovascular issues.
  - Noise exposure ranges from the 51st to 94th percentile, with 7 BGs at or above the 90th percentile. Elevated noise levels, often from highways, railroads, and industrial activities, can contribute to stress, sleep disruption, and adverse cardiovascular outcomes.
- Environmental effects, which represent indirect risks that arise from living near contaminated or degraded environments, such as proximity to hazardous waste facilities, brownfields, or impaired water bodies. Even without direct exposure, these conditions can contribute to long-term environmental and public health issues. In particular:
  - Proximity to hazardous waste facilities ranges from the 88th to 99th percentile compared to BGs statewide, with 22 BGs at or above the 90th percentile. These sites may release pollutants that contaminate soil, water, or air and pose persistent risks to nearby communities.
  - Proximity to Risk Management Plan (RMP) sites ranges from the 89th to 99th percentile compared to BGs statewide, with 23 BGs at or above the 90th percentile. RMP sites are facilities that handle large quantities of hazardous chemicals and are required to submit safety and emergency response plans to the U.S. Environmental Protection Agency (EPA) to prevent chemical accidents.
  - Proximity to National Priorities List (NPL) sites ranges from the 80th to 99th percentile compared to BGs statewide, with 13 BGs at or above the 90th percentile. NPL sites are hazardous waste locations identified by the EPA for long-term cleanup under the Superfund program because they pose a significant risk to human health or the environment.

These results reinforce EPA's characterization that Commerce City - North Denver (CCND)—which includes most of the CSA—as “home to residents overburdened by environmental pollution. Located next to some of the city and state's major highways, large numbers of regulated facilities, and areas with legacy pollution, community members have continued to express concerns about their health, environment, and community” (EPA, 2024).

In March 2022, EPA and CDPHE formalized a strategic partnership through a Memorandum of Understanding (MOU) on *Advancing Environmental Justice through Enforcement and Compliance Assurance in Disproportionately Impacted Communities* (EPA and CDPHE, 2022).

The MOU established a framework for collaboration on enforcement and compliance efforts to reduce pollution in communities overburdened by environmental and public health risks.

Recognizing CCND as an area with DI communities, the study area has become a focal point for environmental justice initiatives in Colorado. Following the MOU, the EPA and CDPHE held community engagement sessions in CCND and Pueblo to:

- Understand environmental issues impacting communities
- Identify ways to improve access to environmental data programs and decision-making
- Inform a work plan to guide implementation of the MOU

The agencies have since published progress reports on Year 1 actions and released a Year 2 work plan in September 2024.

Key accomplishments of the work plan include:

- Providing public education on pollutants, state environmental justice commitments, and environmental conditions in CCND.
- Developing a community health and environment storyboard.
- Launching a data dashboard to improve access to environmental information.

In addition, EPA and CDPHE have promoted the use of Supplemental Environmental Projects (SEPs) in enforcement case settlements that affect DI Communities. They have taken steps to proactively identify SEP opportunities by soliciting input directly from the community. As part of a 2020 settlement between CDPHE and Suncor (CDPHE, 2020), several SEPs were funded, including:

- Two projects were awarded to Cultivando for (1) continuous air monitoring and (2) community-focused education and modeling studies.
- One project was awarded to the Globeville, Elyria-Swansea (GES) Coalition for community stewardship of small parcels of land.

Numerous local organizations remain actively engaged in environmental justice advocacy, education, and mitigation within the CSA. These include:

- **Cultivando.** A local woman-led organization composed of residents from the communities it serves. Its Environmental Justice program “tackles environmental racism and empowers frontline communities to fight for clean air, safe water, and a just transition to a sustainable future” (Cultivando, 2024).
- **GES Coalition.** A coalition of neighborhood leaders and community organizations committed to economic, racial, and environmental justice (GES Coalition, 2024).
- **GreenLatinos.** A national nonprofit focused on environmental issues affecting Latino communities. The Colorado team has been actively involved in the I-270 project and works with groups like Sierra Club, Conservation Colorado, the Southwest Energy Efficiency Project, and the Colorado Public Interest Research Group (CoPIRG).
- **The Gratitude Project.** A collaboration between the Dickinson Lab (Colorado School of Public Health), GreenLatinos, the Wylie Lab (Northeastern University), and GreenRoots Chelsea. Their 2023 report, *Who Bears the Cost?* (Dickinson, K. L., Nyquist, C., Pease, S., & Tafoya, E. T., 2024), documents community concerns about the concentration of

industrial and infrastructure services in CCND that supports the broader Denver metropolitan region. The report highlights:

- A long history of industrial and transportation uses, with environmental violations at 183 facilities over three years and ongoing violations at 94 facilities.
- Inadequate investments in amenities, such as green space and urban trees.
- Regional energy infrastructure, including the Suncor Refinery, Cherokee Generating Station, Metro Wastewater Reclamation District's power generation facility, and petroleum terminals.
- Food production and storage at more than 30 facilities.
- Major roads and rail infrastructure.
- More than 10 solid waste and recycling facilities.

The report concludes that these activities—individually and cumulatively—create a greater environmental health burden for CCND residents, while the associated benefits are often realized in communities that face fewer environmental burdens.

The *I-270 Corridor Improvements Environmental Impact Statement* (CDOT, 2025a) includes a Social and Economic analysis that evaluates how the project alternatives may affect social and economic resources. Topics include:

- Air, noise, and water.
- Natural resources, aesthetic values, community cohesion, and the availability of public facilities and services.
- Employment, tax revenues, and property values.
- Displacement of people, businesses, and farms.
- Community and regional growth.

Given the continued attention to environmental burdens in the CSA—and in compliance with CRS 43-1-128—the project team implemented an engagement strategy to promote transparency, participation, and community confidence in the project's planning process.

## 4.0 Enhanced Engagement Summary

The project team coordinated closely with CDOT's Environmental Justice and Equity Branch, Communications Office, and Region 1's and Environmental Programs Branch's community analyst specialists to evaluate opportunities for enhanced engagement activities.

A Public Involvement Plan (PIP)<sup>7</sup> (CDOT, 2024b) was developed and implemented to define goals and strategies for enhanced outreach. In addition, CDOT's monthly multicultural outreach approach program guided ongoing outreach efforts throughout the project. The *I-270 Corridor Improvements Public Involvement Technical Report* (CDOT, 2025b) provides detailed documentation of these activities and the input received.

Consistent with the intent and requirements of CRS 43-1-128 regarding enhanced engagement with DI Communities, the PIP established procedures to:

---

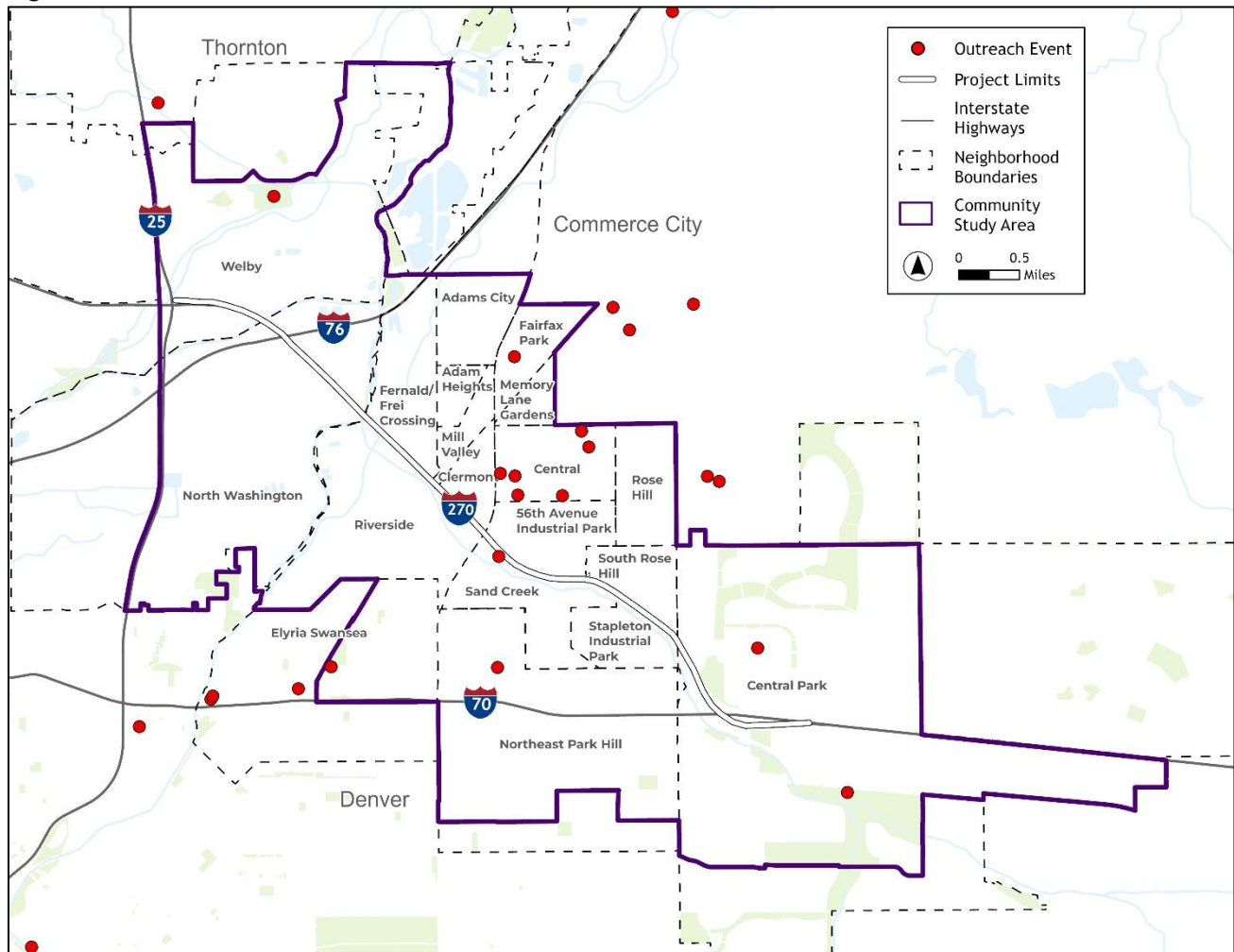
<sup>7</sup> The PIP is available at [https://www.codot.gov/projects/studies/i270study/assets/25611\\_i-270\\_public-involvement-plan\\_rev-4\\_reformatted-remediated.pdf](https://www.codot.gov/projects/studies/i270study/assets/25611_i-270_public-involvement-plan_rev-4_reformatted-remediated.pdf).

- Identify interested stakeholders.
- Provide forums and mechanisms for distributing accurate, easy-to-understand, timely information on issues and activities throughout the process to the general public and interested stakeholders.
- Ensure meaningful opportunities for public participation from low-income and minority populations and other historically underrepresented communities.
- Encourage and solicit agency, stakeholder, and public comments on all aspects of the process, well before key decision points.
- Incorporate comments/feedback received into the process and key decisions.

The PIP was designed as a flexible, adaptive framework that could evolve based on the project needs and community feedback. Engagement approaches were refined over time to ensure sustained participation. For example, extending stakeholder workshops throughout the project planning process provided a consistent forum for informed community engagement and relevant touch points. Many of the outreach strategies were designed to reduce barriers for DI Communities, informed by best practices and recommendations of the Colorado Environmental Justice Task Force, CDPHE, EPA, and community partners.

CDOT's intentional focus on local DI Communities within the CSA is reflected in the breadth of outreach methods, communication tools, and opportunities for public input. These methods were expanded over the course of project development to emphasize in-person engagement and ongoing stakeholder collaboration, ensuring community members were meaningfully represented and had a voice in project decisions. Figure 5 shows the location of public involvement activities conducted within or near the CSA.

**Figure 5. Public Involvement Activities within or near the CSA**



Ensuring that engagement efforts effectively reach and facilitate input from local DI Communities can be challenging. However, the data collected and the direct interactions conducted through these activities indicate the project team has been successful in engaging individuals who live and work within the CSA. Examples of enhanced engagement activities include:

#### 4.1 Listening Sessions

Informal listening sessions were held at well-known community destinations such as Anythink Library and Eagle Pointe Recreation Center. These sessions provided an opportunity for community members to share their thoughts, opinions, and concerns about the I-270 project and related topics in a comfortable, conversational setting. All participants lived or worked in the CSA.

#### 4.2 Stakeholder Workshops

Monthly workshops, hosted at the Eagle Pointe Recreation Center, brought together community residents, local organization representatives, and agency partners, including

CDOT, to discuss key project topics. Invitations were extended to ensure broad, multidisciplinary representation from individuals and organizations with diverse perspectives and expertise. The workshops, facilitated by a third party, focused on topics selected by participants and combined educational topics with collaborative discussion. Subject-matter experts were invited to provide background information on specific topics of interest. The recurring format fostered consistent participation and allowed attendees to build upon prior discussions, deepening their understanding of project issues and potential impacts. The August 2024 workshop, for example, focused specifically on environmental justice.

### 4.3 Community Events and Public Presence

Project team members regularly participated in community events, office hours, festivals, volunteer events, and other meetings serving the CSA. These in-person opportunities helped gather feedback, share educational materials, and build relationships with local residents and organizations.

### 4.4 Public Meetings

Postcard invitations were mailed to residents and businesses within the CSA zip codes to promote public meetings and webinars. Feedback from attendees indicated that postcards were the most effective method of notification, followed by word-of-mouth from other community members and outreach at local events. Additional outreach included Spanish-language radio advertisements, announcements in local newspapers, flyers distributed at community gathering places, emails to the project distribution list, social media posts, and project website updates. Based on public meeting comment forms, at least 60% of participants resided in zip codes within the CSA.

## 5.0 How Public Input Shaped the Project

Public input has guided the project from scoping through alternatives development and environmental analysis. Following the PIP and the enhanced engagement requirements of CRS 43-1-128, CDOT used an iterative process to gather, track, and incorporate feedback from residents, community-based organizations, businesses, freight interests, and local governments. Engagement methods included multilingual public meetings and webinars; small-group listening sessions; recurring stakeholder workshops; office hours and tabling at community events; targeted outreach through local partners; comment forms (online and paper), email, and hotline submissions; and ongoing coordination with advocacy organizations. Materials were prepared for accessibility (plain language, Spanish translation and interpretation, ADA-compliant formats), and events were scheduled and located to reduce participation barriers (varied times/locations and virtual options).

Input was cataloged in a comment database and response-tracking system and was used in four primary ways:

- **Process direction.** Community concerns about cumulative burdens and environmental justice shaped the decision to prepare a full EIS and the approach to ongoing outreach.

- **Enhancements to outreach and engagement.** Feedback on access and transparency led to expanded, more frequent, and more in-person engagement, with plain-language materials and bilingual communications.
- **Technical scope and alternatives.** Comments helped refine the purpose and need, identify key transportation issues, and elevate multimodal priorities for evaluation.
- **Mitigation and enhancements.** Community input guided resource-specific analyses, mitigation development, monitoring concepts, and the framework for non-federally funded community enhancements consistent with CRS 43-1-128.

The subsections below highlight concrete outcomes of this input: the request for—and initiation of—a full EIS (Section 5.1); improvements to engagement and outreach (Section 5.2); changes to transportation priorities and alternatives (Section 5.3); and guidance on environmental analysis and mitigation (Section 5.4).

## 5.1 Request for a full Environmental Impact Statement (EIS)

Given concerns about environmental justice and the cumulative effects of industrial and transportation land uses in an already disproportionately impacted area, community members and local organizations urged CDOT and FHWA to fully study potential impacts before advancing project decisions. In response, CDOT announced in 2023 its intent to prepare an EIS, and in August 2024, issued a formal Notice of Intent to initiate the process. CDOT emphasized that the EIS would include expanded outreach to satisfy the enhanced engagement requirements of CRS 43-1-128, addressing prior limitations on public events during the pandemic period when early project development occurred.

## 5.2 Expanded Outreach and Engagement

Informed by feedback from community and environmental organizations, the project team expanded and diversified engagement to improve access, transparency, and two-way communication. Changes included more frequent and in-person events; multilingual materials and interpretation; plain-language content; multiple venues and times (including virtual options); and simplified comment submittal through online and paper forms, email, and a public hotline. Comments from 2020 to 2022 frequently expressed concerns about limited outreach during the pandemic, whereas comments since 2023 have been increasingly positive, recognizing the project’s improved transparency and accessibility. At the April 2024 public meeting, one commenter said, “Thank you for all the outreach and community engagement you’re doing. Keep it up!”

## 5.3 Influence on Transportation Priorities and Alternatives

Public and stakeholder input provided critical insight into transportation needs such as congestion, safety, freight movement, and local travel impacts. This input complemented technical analyses—including traffic modeling, safety evaluations, and emergency response challenges—and emphasized how deteriorating pavement and bridge conditions affect community mobility and identity. CDOT used this feedback to refine the purpose and need statement and shape alternatives that reflect both agency and community priorities. For example:

- **Elevating multimodal considerations.** Community interest in bicycle, pedestrian, and transit improvements led to inclusion of multimodal improvements in the purpose and need statement, evaluation of new bike and pedestrian connections and facilities, and the consideration of bus stops at Quebec Street.
- **Minimizing impacts.** A project goal to minimize environmental and community impacts was also added to the purpose and need statement in response to public feedback.

## 5.4 Guidance on Environmental Analysis and Mitigation

Community input helped identify the environmental, social, and economic resources of greatest concern and informed the scope and methods used in the EIS. This feedback guided the development of measures to avoid, minimize, or compensate for potential adverse effects, as well as concepts for monitoring and follow-up. Input also contributed to the framework for non-federally funded community enhancements consistent with CRS 43-1-128, ensuring that mitigation and complementary investments respond to locally expressed priorities.

## 6.0 Advancing Community Enhancements

CDOT worked with community members to identify complementary community enhancements that extend beyond the mitigation measures included in the EIS. Grounded in community input, coordinated agency review, and transparent decision-making, this effort is intended to deliver benefits that extend beyond the EIS, producing lasting, positive outcomes for the neighborhoods and people most affected by the project.

The framework for identifying and implementing community enhancements (included in Attachment A) establishes a clear, collaborative process that reflects community values, aligns with the intent of CRS 43-1-128 and CDOT Directive 604.0 *Policy on Non-Discrimination* (2014), and is consistent with CDOT's broader goals and standard practices for community impact assessment and environmental justice. This state-led framework was also developed in response to recent federal policy shifts that de-emphasize issues Colorado considers priorities, ensuring those concerns continue to be addressed. Attachment B presents the specific community-recommended enhancements developed through this process.

## 7.0 How to Stay Involved

The best ways to be involved in project decision making are to learn more by reviewing and commenting on the project documents, including CDOT's proposed community enhancements commitments. The comment period for the State Reports coincides with the Draft EIS comment period, which is open for 60 days. All comments received during this time, regardless of how they are submitted, will be given equal consideration.

### 7.1 Public hearings

CDOT will hold public hearings that include an open house with exhibits about the project and team members available to answer questions about both the Draft EIS and the State Reports. Each hearing will also include a CDOT presentation and a formal opportunity to record

comments, either publicly or privately, with a court reporter. Comments recorded by the court reporter will be included in the official meeting transcripts. Comments submitted through paper or online forms will be given equal consideration.

Information about and materials from the hearings and webinar will be posted on the project website (<https://www.codot.gov/projects/studies/i270study>).

## 7.2 Other Ways to Comment

You can also submit written comments by email, postal mail, telephone hotline, or through the project website.

- E-mail: [cdot\\_i270@state.co.us](mailto:cdot_i270@state.co.us)
- Mail: Colorado Department of Transportation at 4670 Holly Street, Denver, CO 80216 (Attn: David Merenich, PE)
- Hotline: 303-512-4270
- Website: <https://www.codot.gov/projects/studies/i270study>

After the comment period closes, CDOT will review and consider all feedback received. Based on public input, agency coordination, and any new information, CDOT may make corrections, additions, or refinements to this report before releasing a final version to the public.

CDOT will continue to keep the public informed about decisions and future opportunities for input. If you provide your name and email address when submitting a comment, you will be added to the project mailing list to receive regular updates. If you have no comments on this document but would still like to stay informed, you may join the email list by request through the project website, email, or hotline.

## References

Colorado Department of Public Health and Environment (CDPHE). 2024. Colorado EnviroScreen tool. Available at [https://teeo-cdphe.shinyapps.io/COEnviroScreen\\_English/](https://teeo-cdphe.shinyapps.io/COEnviroScreen_English/) [https://teeo-cdphe.shinyapps.io/COEnviroScreen\\_English/](https://teeo-cdphe.shinyapps.io/COEnviroScreen_English/) (English) and [https://teeo-cdphe.shinyapps.io/COEnviroScreen\\_Spanish/](https://teeo-cdphe.shinyapps.io/COEnviroScreen_Spanish/) [https://teeo-cdphe.shinyapps.io/COEnviroScreen\\_Spanish/](https://teeo-cdphe.shinyapps.io/COEnviroScreen_Spanish/) (Spanish). Accessed December 2024.

CDPHE. 2020. <https://cdphe.colorado.gov/press-release/state-health-department-announces-an-historic-9-million-enforcement-package>.

CDOT. 2022. Regionally Significant and Transportation Capacity Interpretation and Examples for CDOT Projects.

<https://www.codot.gov/programs/environmental/greenhousegas/regionally-significant-and-transportation-capacity-definition-final-08312204172023.pdf>. Accessed June 2025.

CDOT. 2024a. CDOT NEPA Manual. <https://www.codot.gov/programs/environmental/nepa-program/nepa-manual>. Accessed September 2024.

CDOT. 2024b. Public Involvement Plan. [https://www.codot.gov/projects/studies/i270study/assets/25611\\_i-270\\_public-involvement-plan\\_rev-4\\_reformatted-remediated.pdf](https://www.codot.gov/projects/studies/i270study/assets/25611_i-270_public-involvement-plan_rev-4_reformatted-remediated.pdf). Accessed June 2025.

CDOT. 2025a. I-270 Corridor Improvements Project Draft Environmental Impact Statement.

CDOT. 2025b. I-270 Corridor Improvements Project Public Involvement Technical Report.

Cultivando. 2024. Our Environmental Justice Program.

<https://www.cultivando.org/environmentaljustice>. Accessed November 2024.

Dickinson, K. L., Nyquist, C., Pease, S., & Tafoya, E. T. (2024). *Who bears the cost? North Denver environmental justice report and data audit* (Report). GreenLatinos.

[https://www.greenlatinos.org/wp-content/uploads/2024/04/N-Denver-Report\\_English\\_Online\\_workinghyperlinks.pdf](https://www.greenlatinos.org/wp-content/uploads/2024/04/N-Denver-Report_English_Online_workinghyperlinks.pdf).

Globeville, Elyria-Swansea Coalition. 2024. Collection Vision. at: <https://www.ges-coalition.org/collective-vision>. Accessed November 2024.

US Census Bureau. 2023. TIGER/Line Shapefiles (machine-readable data files) / prepared by the U.S. Census Bureau. <https://www.census.gov/geographies/mapping-files/time-series/geo/tiger-line-file.2023.html#list-tab-790442341>.

US Environmental Protection Agency (EPA). 2024. Environmental Justice in Commerce City - North Denver. Accessed on February 2025. As of September 16, 2025, no longer available on the EPA website. Similar information available at: <https://coepht.colorado.gov/ccnd>.

EPA and CDPHE. 2022. Memorandum of Understanding on Advancing Environmental Justice through Enforcement and Compliance Assurance Efforts in Disproportionately Impacted Communities the United States Environmental Protection Agency Region 8 and the Colorado Department of Public Health and Environment.

# Attachment A. Community Enhancements Framework

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](mailto: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](#).

## 1.0 Context for Non-Federally Funded Community Enhancements

The I-270 corridor CSA includes some of Colorado’s most disproportionately impacted communities, as identified by CRS 43-1-128 and HB 23-1233. These communities have experienced persistent environmental and infrastructure challenges, including concentration of industrial land uses with associated higher exposure to air and noise pollution, heavy truck traffic, and limited buffers between industrial operations and residential areas. Combined with limited access to safe and reliable transportation options, and ongoing air quality concerns, these factors have heightened concerns about cumulative effects on community health and quality of life. Community members in the CSA have played an active role in past planning efforts and were instrumental in shaping Colorado’s environmental justice policies.

Through the I-270 EIS process, CDOT has implemented a comprehensive public engagement strategy that combines sustained collaboration with a multidisciplinary stakeholder group and broad-based community outreach. These efforts have helped build trust and create a strong foundation for mutual understanding, informed decision-making, and responsiveness to community priorities.

The approach to community enhancements built on this engagement by establishing a structured process to identify and advance locally supported improvements. It reflected the intent of Colorado’s environmental justice legislation and ensured that infrastructure investments align with community values and needs. To demonstrate this commitment, CDOT anticipates dedicating approximately 1.5% to 2% of the total project cost to community enhancements that deliver tangible community benefits.

## 2.0 Community Enhancements Framework

This framework outlines a four-step process for identifying, evaluating, and advancing community enhancements in partnership with residents and local organizations (see Figure A-1). The process began with a review of public and stakeholder recommendations and input received throughout the environmental review, followed by the formation of a representative subcommittee to help refine and prioritize ideas using clear and practical criteria, such as cost, feasibility, equity, and potential community benefit.

Enhancements were initially grouped into four investment types—community, mobility, environment, and partnerships—to align opportunities with project phases, funding strategies, and state policy goals. The subcommittee reviewed and ranked all enhancement suggestions, and then CDOT refined and grouped the suggestions into nine categories. All but two suggestions were accommodated within the project commitments.

Draft recommendations have been incorporated into this State Community Analysis Technical Report. This approach ensures that proposed enhancements are considered alongside the Draft EIS, providing a comprehensive view of project commitments from both federal and state perspectives.

**Figure A-1. Steps Used to Identify Community Enhancements**



## 2.1 Step 1: Review Previous Suggestions

The project team, including CDOT, reviewed enhancement requests collected during earlier engagement activities—public meetings, stakeholder workshops, and other forums—to identify project or program investments with potential community benefits. This review identified which investments were already addressed in the EIS (either through project elements or required mitigation) and which could be considered supplemental enhancements.

Supplemental enhancements go beyond mitigation to address local priorities and reflect the goals of CRS 43-1-128 by meaningfully involving the community in assessing and prioritizing enhancements that reflect state environmental justice and climate goals. These ideas formed the foundation for the next phase of the process: convening a representative subcommittee to refine and prioritize enhancements with community leadership.

## 2.2 Step 2: Convene a Subcommittee

The Community Enhancement Subcommittee, composed of members of the I-270 Stakeholder Working Group, was established to provide geographic representation of neighborhoods within the CSA. The subcommittee’s purpose was to review input and develop a package of community-driven recommendations that would become part of the project’s commitments

and be released for public review. CDOT committed to implement these recommendations as long as they were technically and financially feasible. The subcommittee met three times between August 2025 and September 2025. Its work followed a transparent, collaborative framework to ensure equitable participation and clear decision-making. The process emphasized:

- Building on existing ideas from previous engagement activities
- Inviting new ideas from community networks
- Applying clear criteria—cost, feasibility, equity, and community benefit—to evaluate options
- Developing a prioritized, implementable package of enhancements

The first meeting, held virtually on August 11, 2025, defined the subcommittee’s role, scope, and timeline. Participants discussed enhancement categories and examples—Community, Environment, Mobility, and Partnerships—to guide idea generation and refinement.

- **Community:** livability, safety, and neighborhood identity (e.g., traffic calming, park or art projects).
- **Environment:** air, water, and habitat quality (e.g., tree planting, green infrastructure).
- **Mobility:** safe and efficient access (e.g., microtransit, bike safety, traffic alerts).
- **Partnerships:** collaboration and capacity building (e.g., workforce programs, community grants).

The second meeting, held in-person on August 20, 2025, focused on reviewing, refining, and prioritizing enhancements ideas. The process was community-led, with CDOT resource specialists available to answer questions and provide technical support. Participants expressed strong support for implementing nearly all proposed enhancements, added new ideas, and suggested consolidating overlapping enhancements.

## 2.3 Step 3: Assess and Prioritize

The third subcommittee meeting was used to finalize recommendations for the broader Stakeholder Working Group and prepare materials for public review. Given the support across community enhancements, CDOT reviewed the full list that came out of the second subcommittee workshop to assess the technical feasibility and cost of each potential enhancement. As part of this review, CDOT consolidated the list into nine broad commitments that encompass all feasible ideas and determined that nearly all enhancement ideas were feasible and likely affordable, either in part or in full, using the non-federal funds allocated for community enhancements.

The nine commitments encompass community priorities and provide flexibility to adapt to evolving community needs and priorities. Along with defining these nine commitments, CDOT also proposed a funding allocation across the commitment categories, all of which prioritize implementing through community partnerships.

The nine commitments and associated funding allocations are:

1. Landscaping and Aesthetic Enhancements Outside the Project Limits (7%)
2. Landscaping and Aesthetic Enhancements Within the Project Limits (7%)
3. Enhanced Air Quality Monitoring and State Plan (10%)

4. Support for Community and Environmental Projects (30%)
5. Enhanced Work Zones (15%)
6. Travel Demand Management Services (10%)
7. Freight Efficiency and Community Impact Reduction (10%)
8. Workforce Development and Local Business Support (10%)
9. Tracking and Reporting Enhancement Progress (1%)

Commitment 9 (Tracking and Reporting Enhancement Progress) establishes an ongoing mechanism for community input on funding priorities and implementation progress. The structure for this process is intended to remain community-led, flexible, and adaptable to evolving changing needs, priorities, and circumstances.

Initial allocations from the community enhancement fund have already supported early efforts, including:

- CO-224 multimodal improvements
- Travel Demand Management services prior to construction (in partnership with via the Northeast Transportation Coalition (NETC))
- Enhanced Air Quality Monitoring prior to construction (in partnership with Air Sciences)
- Reconnecting Communities Planning Grant match for the 60th Avenue multimodal connections between Brighton Boulevard and Vasquez Boulevard.

Remaining funds will be directed to the nine commitments, ensuring that community voices, equity principles, and state environmental goals continue to guide enhancement decisions throughout project delivery.

Attachment B provides a detailed description of each commitment and lists potential enhancements that would fall under each commitment.

These commitments were presented to the subcommittee in September 2025. The agreed that the proposed grouping of enhancements captured the scope and intent of the community recommendations, as well as CDOT's plan to make final enhancement decisions at a later stage. Members also expressed strong support for implementing investments through local organizations and community groups to maximize effectiveness and build on the trusted networks working in the CSA. CDOT also presented the proposed commitments to the full Stakeholder Working Group and received positive feedback.

## **2.4 Step 4: Share with Broader Community**

The inclusion of these attachments related to community enhancements in the State Community Analysis Technical Report provides an opportunity to share and solicit feedback from the public concurrently with the public review of the Draft EIS. CDOT will publish the State Community Analysis Technical Report separately from the federal Draft EIS reporting requirements. These State Reports will be published on the I-270 website and open to public review at the same time as the Draft EIS. This coordinated effort will:

- Allow community members and agencies to review and comment on both the Draft EIS and state-proposed enhancements through a unified process
- Ensure that feedback on enhancements is gathered through the same accessible and inclusive public comment channels used for the Draft EIS

- Help finalize a set of commitments (and associated community enhancements) that reflect broad community input and can be implemented with transparency and accountability

### 3.0 Conclusion

This framework has provided a clear and collaborative path for advancing community enhancements that reflect the values of environmental justice and support the goals of CRS 43-1-128. By grounding this process in community input, coordinated review, and transparent decision-making, CDOT can ensure that the I-270 project delivers benefits that go beyond required mitigation, creating lasting, positive outcomes for the people and neighborhoods most affected by the project.

## Attachment B. Community-Recommended Enhancements

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](mailto: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](#).

## 1.0 Introduction

Building on the framework and subcommittee input outlined in Attachment A, CDOT responded to the subcommittee's request to present specific improvement concepts that reflected their ideas and could be effectively evaluated and discussed. Using the list of community-generated enhancements as a foundation, CDOT organized and refined the ideas into tangible improvement packages to help the subcommittee:

- Evaluate the feasibility and cost of enhancement ideas;
- Consolidate them into clear, achievable commitments;
- Maintain flexibility to adapt to evolving technologies and community needs; and
- Ensure transparency and accountability through regular reporting.

CDOT evaluated each proposed enhancement for feasibility and cost-effectiveness, finding that nearly all were practical and achievable within the identified enhancements budget. The ideas were consolidated into nine commitment categories, which CDOT presented to the subcommittee for review. The subcommittee provided additional feedback to clarify types of potential improvements under each category, leading to refinement and endorsement of the commitments. These subcommittee-endorsed commitments were then presented to the full Stakeholder Working Group, which expressed strong support for the commitments, funding allocation among them, and the community-led approach to implementation and monitoring.

## 2.0 Community Enhancement Commitments

As described in the sections that follow, the following commitments were developed in close collaboration with stakeholders and articulate CDOT's intent, corresponding funding allocations, and potential enhancements designed to achieve the desired outcomes. Implementation is intended to be flexible, allowing each commitment to adapt to evolving community needs, changing funding conditions, and emerging partnership opportunities.

### 2.1 Commitment #1: Landscaping and Aesthetic Enhancements Outside the Project Limits

CDOT is committed to improving the landscaping and aesthetics around the I-270 corridor, extending beyond the immediate project limits. In partnerships with local agencies and organizations, the project will help fund and coordinate the installation of landscaping and aesthetic features with local partners managing the implementation and long-term maintenance. CDOT intends to dedicate 7% of the total community enhancement budget to this commitment.

Examples of potential community enhancements that CDOT could implement to support Commitment #1 are listed below:

- Expanding tree planting in neighborhood and parks.
- Installing shade shelters or planting trees to improve walkability.
- Improving greenspaces with drought-tolerant, pollinator-friendly native plants.
- Supporting the Sand Creek Greenway through targeted restoration zones & native planting projects.

- Improving floodplain areas to improve retention capacity and flood mitigation.
- Partnering with Commerce City on citywide tree canopy initiative.
- Coordinating with Commerce City on planting, irrigation/soil amendment, water credit opportunities.
- Partnering with schools and community groups on youth and/or senior programming for tree planting days.
- Installing public art by local artists on transportation infrastructure.
- Constructing visual barriers to screen industrial areas from nearby neighborhoods.
- Incorporating landscaping that helps absorb particulate matter and other pollutants.

## **2.2 Commitment #2: Landscaping and Aesthetic Enhancements Within the Project Limits**

CDOT will integrate enhanced landscape and aesthetic elements—including vegetation, trees, and public art—within the project limits. These elements will be detailed and publicly reviewed as part of the planned I-270 Aesthetic and Landscape Guidelines Plan. CDOT will complete the installations as part of project construction, with long-term maintenance managed through intergovernmental agreements (IGAs) with local agencies. CDOT intends to dedicate 7% of the total community enhancement budget to this commitment.

Examples of potential community enhancements that CDOT could implement to support this commitment include:

- Installing shade shelters or plant trees to improve walkability.
- Improving greenspaces with drought-tolerant, pollinator-friendly native plants.
- Installing public art by local artists on infrastructure.
- Constructing visual barriers to screen industrial areas from nearby neighborhoods.
- Incorporating landscaping that helps absorb particulate matter and other pollutants.

## **2.3 Commitment #3: Enhanced Air Quality Monitoring and State Plan**

CDOT will implement air quality monitoring before, during, and after construction, in coordination with local agencies to ensure consistent data collection and sharing across regional networks. With community input, CDOT will also develop a State Plan to supplement the air quality mitigation measures described in the EIS. CDOT intends to dedicate 10% of the total community enhancement budget to this commitment.

Examples of potential community enhancements that CDOT could implement to support this commitment include:

- Improving public access to AQ info via real-time, mobile-friendly AQ dashboard.
- Partnering with Love My Air to expand air quality monitoring and data access to the public.
- Supporting the Adams County air sensor program.
- Advancing the transition to alternative energy for targeted CDOT maintenance equipment.
- Conducting enhanced street sweeping within the project area.

## **2.4 Commitment #4: Support for Community and Environmental Projects**

CDOT is committed to collaborating with, participating in, and financially supporting local agency and community-led projects outside of the I-270 limits that enhance community well-being. These efforts will promote improved safety, multimodal options, environmental and regional air quality improvements, community development, and alternative energy solutions to benefit those most affected by the project. CDOT intends to dedicate 30% of the total community enhancement budget to this commitment.

Examples of potential community enhancements that CDOT could implement to support this commitment include:

- Extending trail/sidewalk connections to improve safety and accessibility.
- Supporting electric vehicle (EV) infrastructure for both commercial and individual use.
- Partnering with Commerce City to fund greenhouse gas inventories and environmental projects.
- Collaborating on regional or local air quality improvement initiatives.
- Hosting litter cleanup days near greenways, engaging youth and volunteer groups.
- Partnering with schools for environmental education & health workshops in the area.
- Working with agencies to remediate former industrial properties.
- Evaluating and prioritizing use of I-270 to benefit regional transit service.
- Implementing traffic calming measures on local streets near schools and recreation areas.
- Enhancing greenway amenities and partnering with the Sand Creek Regional Greenway Partnership (SCRGP) on priority projects.
- Establishing or expanding pothole repair and local road maintenance programs.
- Partnering with local agencies to develop strategies that discourage unsafe encampments.
- Improving floodplain areas to increase retention capacity and enhance flood mitigation.
- Integrating solar panels into transportation infrastructure.
- Partnering with the Adams 14 School District to expand electric transportation options.

## **2.5 Commitment #5: Enhanced Work Zones**

CDOT is committed to implementing enhanced measures beyond standard practices to improve safety, mobility, and incident response within the work zone during construction.

CDOT intends to dedicate 15% of the total community enhancement budget to this specific commitment.

Examples of potential community enhancements that CDOT could implement to support this commitment include:

- Implementing a tow truck patrol system to quickly clear accidents.
- Installing cameras to enhance monitoring and incident response.
- Increasing enforcement of speed limits on I-270.
- Upgrading freight detour routes in construction by improving pavement quality and signage.
- Using remote enforcement tools such as drones, cameras, and dedicated speed traps.

## 2.6 Commitment #6: Travel Demand Management Services

CDOT will collaborate with Transportation Management Organizations (TMOs), including Northeast Transportation Connections (NETC), to deliver Transportation Demand Management (TDM) services before and during the I-270 project construction. CDOT will also support local agencies in securing long-term funding to sustain these initiatives after project completion. CDOT intends to dedicate 10% of the total community enhancement budget to this commitment.

Examples of potential community enhancements that CDOT could implement to support this commitment include:

- Providing free or subsidized transit passes in the study area during construction.
- Implementing ADA-accessible mobility shuttles during construction.
- Supporting carpool and ridesharing incentives through reward programs and vouchers.
- Implementing micro-transit options through the RTD Partnership Program.
- Launching bicycle education and safety programs for schools and neighborhoods through NETC.
- Providing toll subsidies or discounts for qualifying locals if Express Lane are installed.
- Providing free HOV transponders to qualifying locals.
- Implementing a Mobility Wallet Program.

## 2.7 Commitment #7: Freight Efficiency and Community Impact Reduction

CDOT is committed to working with relevant partners and investing financially in freight improvements that extend beyond the immediate project scope. These contributions will support regional and statewide initiatives aimed at addressing systemic freight challenges along I-270. The goal of freight improvements is to create more efficient and reliable freight operations, which will reduce negative impacts and create a better environment for residents and businesses along I-270. CDOT intends to dedicate 10% of the total community enhancement budget to this commitment.

Examples of potential community enhancements that CDOT could implement to support this commitment include:

- Implementing freight improvements to reduce conflicts between trucks and community travel.
- Exploring formalized, legal truck parking near Quebec and other suitable locations.
- Pursuing grants and funding opportunities for freight program improvements.

## 2.8 Commitment #8: Workforce Development and Local Business Support

CDOT will partner with local organizations and other programs to provide targeted job opportunities and support services, particularly for residents in areas affected by construction. These efforts may include apprenticeships, pre-apprenticeship programs, and specialized training to bridge skill gaps and build a skilled local workforce pipeline. CDOT will also implement programs designed to support local businesses throughout the project's

duration. CDOT intends to dedicate 10% of the total community enhancement budget to this specific enhancement.

Potential community enhancements that CDOT could implement to support this commitment include:

- Offering bilingual workforce development programs for locals & business outreach for contractors.
- Providing coupon programs for construction workers to support local businesses.
- Using locally sourced vendors, services, and workers during construction.
- Implementing a community ambassador program to employ residents in project outreach.

## **2.9 Commitment #9: Tracking and Reporting Enhancement Progress**

CDOT is committed to maintaining ongoing transparency and accountability by publishing regular community enhancement reports. These reports will document the status of each community enhancement commitment and include information on both completed and planned activities for public review. CDOT intends to dedicate 1% of the total community enhancement budget to this specific commitment.

Unlike other commitments, this commitment focuses on process and reporting activities rather than specific enhancement projects. CDOT will ensure that progress tracking and communication remains accessible, clear and responsive to the community through the following actions:

- Providing detailed updates that demonstrate how each enhancement can be implemented and tracked to completion.
- Issuing progress reports at the start of construction, available both online and in printed pamphlet form.
- Sharing information during preconstruction about historical and upcoming community enhancements through project e-blasts.
- Demonstrating how investments are directed to, and benefiting, affected communities.
- Hosting community outreach events to discuss progress and gather input on future enhancement efforts.

## **3.0 Conclusion**

The nine community enhancement commitments outlined in this attachment represent the result of a collaborative, community-driven process that brought together residents, local agencies, and CDOT to identify meaningful, achievable actions that respond to community priorities. Each commitment reflects the shared intent to improve quality of life, enhance environmental conditions, and support equitable outcomes for the communities most affected by the I-270 project.

Through ongoing coordination with interested stakeholders, CDOT will continue to advance these commitments from planning into implementation. Progress will be regularly tracked and reported through public updates and community meetings to ensure transparency and accountability.

As the project moves forward, CDOT is committed to sustaining these efforts beyond construction by supporting partnerships, securing long-term funding where feasible, and aligning future actions with evolving community needs. Together, these commitments form a foundation for lasting community benefits that build upon the project's commitments.